



Date: 17 October 2023
To: Hilary Samuel, Taupō District Council
From: Rowan Sapsford, ROAM Consulting
Subject: Taupō District Plan Change 38: Strategic Directions – Response to Minute 20 of the Independent Hearing Panel

Purpose

The purpose of this memo is to respond to questions raised by the independent hearing panel in Minute 20 as they relate to Plan Change 38 – Strategic Directions (PC38) to the Taupō District Plan (TDP).

I have been asked to respond to these queries as the author of the Section 42a report for PC38. I have set out my response below.

Response to Panel Questions

In responding to the questions posed in Minute 20 I have set out the question for context using the minute para reference. I have set out my response for each question following.

Hierarchy of the Strategic Directions in General

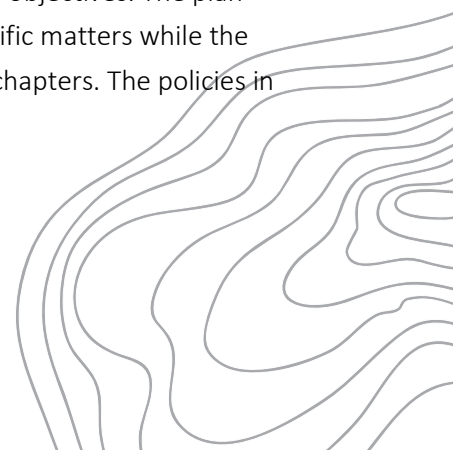
The Panel seeks clarification from the Reporting Officer to further understand firstly the inter-relationship between the objectives and the policies in each Strategic Direction topic and secondly the relationship between the Strategic objective/policies in each topic and the provisions that sit beneath them within the other chapters of the Plan. In particular:

Question 8a: Are the strategic policies intended to implement the strategic objectives?

Yes, they have been developed to directly implement the strategic objectives. They do not implement them exclusively as they are also to be implemented by the wider plan, such as by the General Rural and Rural Lifestyle Chapter which implements several of the strategic directions.

Question 8b: Are the objectives and policies of the individual plan chapters (for example the General Rural and Rural Lifestyle Environment Chapter) required to implement both the strategic objectives and the strategic policies?

The individual plan chapters are required to be consistent with the Strategic Direction objectives and policies. The individual plan chapters are a key means of implementing the strategic objectives. The plan chapters will have a more detailed focus so will no doubt be more focussed on specific matters while the strategic objectives take a higher-level approach which will be relevant to multiple chapters. The policies in the individual chapters will be implementing the objectives in those chapters.



Role of Taupō District 2050 – District Growth Management Strategy 2018

Question 12a: Was TD2050 2006 listed as an externally referenced document when the ODP was notified?

TD2050 was introduced into the TDP via a series of variations (19 -21) which incorporated key relevant aspects of TD2050 2006 into the TDP. TD2050 formed part of the S32 documentation. Reference to TD2050 was introduced into Section 3e of the TDP however only in explanatory text and not statutory provisions. Section 3e does embed the growth framework and structure plan process from TD2050 into the TDP as do wider provisions and zoning introduced via PC 19 – 21.

Question 12b: What are the principal changes in direction between the previous TD2050 2006 and TD2050 2018 version?

TD2050 2018 is considered a refresh rather than a change in the direction or philosophy of the 2006 version. The 2018 edition was a consolidated version that had a tighter focus on growth management but kept the same philosophy. In 2006 growth projections were optimistic with a perpetual growth scenario. The 2006 version of TD2050 was consistent with that optimism and in hindsight over provided for growth. In 2018 (based on 2013 census data) the forecasted growth reached “peak population” in the 2040s. On that basis the growth areas were refined, and some growth areas which were more remote, and therefore anticipated to be more expensive to service were removed.

Although more recent growth projections are more positive than 2013 (but probably less so than 2006) the 2018 version of TD2050 still provides for adequate land for residential growth for at least the next 20 years (as set out by Philip Caruana’s evidence [here](#)).

The key changes and reasoning are set out in section 1.1 (page 6) of TD2050 2018.

Question 12c: Given the current TD2050 version was prepared in 2018, is it still fit for purpose going forward (or alternatively which provision/s in it are no longer current/ relevant or no longer form the policy direction of Council)?

Yes, the philosophy inherent within TD2050 2018 and the areas identified for growth etc, are still considered relevant to the current situation. Those areas zoned and identified for urban land use in TD2050 still, collectively, have sufficient capacity to cater for growth in the District for at least the next 20 years. This is illustrated by the Council not being “in a rush” to update TD2050, with the motivation for the update being to align it with Plan Change One to the RPS, rather than there being any pressure on land for residential growth.

Question 13a Parts of the Strategy, which originated in 2006, are no longer relevant (as discussed in the hearing with Ms Samuel)

Not all aspects of TD2050 were brought through to the 2018 document. The 2018 version focussed more specifically and succinctly on land use planning using a revised growth model. This is succinctly set out on page 5 of TD2050: *TD2050 2006 was developed at a time when Council had a limited set of tools to manage urban growth. Council now has tools like development contributions, financial and infrastructure strategies to support the*

management of growth. This means this version of TD2050 can focus on ensuring there is a sufficient supply of land for the anticipated residential, commercial and industrial growth.

Question 13b: The Strategy is currently going through a further ‘refresh’ being over 5 years old and it is not clear what changes in direction are proposed; and

TD2050 2018 is to be reviewed to ensure that it is consistent with Waikato Regional Policy Statement Change 1 (WRPSPC1). At this time, it is not anticipated that there will be a change in the current philosophy that underpins TD2050, however the detail of some parts of the strategy may change to reflect the WRPSPC1 and any significant changes in growth projections. It is anticipated that the TDP will be changed, via a plan change, to ensure that it reflects the revised strategy. Any such a change will need to include updating any references in the TDP to the most up to date version of TD2050.

Question 15: On the above basis, the Panel wishes to understand whether:

- a) Urban Form and Development Objective 2 and Policy 3 can be appropriately recast without specific reference to TD2050 2018; and/or
- b) Are there spatial or specific matters within TD2050 2018 that could be referred to in Objective 2 and example might be the reference to the East Taupō Arterial in its role in the spatial aspect of Urban Form and Development. Policy 3 (within the scope of the Plan Change and submissions) that better deliver the outcomes sought by TD2050 2018; rather than referring to TD2050 2018 in its totality? A (non-exclusive)

As noted in the minute, TD2050 2018 is referred to twice within PC38 provisions as follows:¹

Objective 2.3.2.2 - *Subdivision, use and development of land will be consistent with TD2050 2018 to protect the effective functioning of the General Rural Environment, maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of cost effective infrastructure.*

Policy 2.3.3.3 - *Avoid the subdivision, use and development of land that is not be consistent with TD2050 2018.*

These provisions refer to guidance on the patterns of land use and development which are set out in TD2050 2018. This future development pattern is set out in Section 3 of TD2050 2018.

Reference to TD2050 2018 is an integral part of the provisions in question. The references provide specific recognition of the land use and development pattern identified in section 3 of TD2050 2018 within the TDP.

In response to the questions posed by the panel, the ability to either remove the reference to TD2050 2018 or provide more specific reference, are related to the scope required of these references. As noted above, it is my view that Section 3 of the strategy contains the relevant direction required for the two provisions.

There is no functional need to refer to the wider strategy. Section 3 of the strategy implements the Vision and Direction contained in Section 2. The TDP is one tool which, in turn, implements section 3.

The guidance in section 3 is in map form in 3.1 which shows the development pattern for the Taupō District, and the actions. Both contain direction relevant to land use planning. The importance of the guidance within

¹ Provisions from Right of Reply version of PC38.

section 3.6 Tangata Whenua and Multiply-owned Māori Land, is discussed in my S42A report in response to submissions by the Rangatira Block Trusts.

To respond to Question 15a, yes, the provisions could be recast. However, to retain the required direction, Section 3 of TD2050 2018 would potentially have to be brought into the TDP as an appendix, with the provisions referring directly to that Appendix. The other option (which responds to Question 15b of the minute) would be to revise the provisions to include reference to ‘Section 3 of the TD2050 2018’ or the ‘TD2050 2018 Future Development Pattern’.

I note that both options would anchor the direction in TD2050 relating to land use on the eastern side of the ETA with reference to Map 1-Northern Growth Areas and Action 2 – Maintain clear limits to the outer extent of all urban areas.

Infrastructure

Question 19: For example, Objectives 1 and 3 and Policies 1 and 2 of Strategic Direction 5 include the terms ‘Nationally and Regionally Significant Infrastructure’. That is consistent with the title of Strategic Direction 5. However, Objective 4 refers to ‘Local and national transport infrastructure’, and Policies 3, 4 and 5 only refers to ‘infrastructure’. Are those objectives and policies therefore relevant to ‘Nationally and Regionally Significant Infrastructure’?

As noted in the question the provisions as well as the introduction, of 2.5 refer to a range of infrastructure including nationally, regionally, and locally important infrastructure. I consider the revised heading to be misleading as it only refers to nationally and regionally significant infrastructure. Reverting to ‘Significant and Local infrastructure’ would be a more accurate heading.

Question 20i: Clarification of the hierarchy of the infrastructure terms and definitions

There are a range of different types of infrastructure which are referred to in Section 2.5 of PC38. These reflect the range of infrastructure types now referred to in national and regional policy. The types of infrastructure referred to in 2.5 are set out in the table below.

Statutory Level	Term
Resource Management Act	Infrastructure – (RMA s2)
National Policy Statement	Nationally Significant Infrastructure (NPSUD 2020) Additional Infrastructure (NPSUD 2020) Development Infrastructure (NPSUD 2020) Development Infrastructure (NPSUD 2020)
Regional Policy Statement	Regionally Significant Infrastructure (Consistent with Waikato and Bay of Plenty Regional Policy Statements)

Question 20 ii: Is there a hierarchy of objectives and policies where differing ‘infrastructure’ terms are used?

There is no stated hierarchy of objectives and policies in section 2.3. There is however a hierarchy of infrastructure on the basis of how it is referred to within those provisions, i.e. recognise and provide. Recognise, consider etc and its basis in higher level policy such as an NPS.

Question 20 iii: A wiring diagram between the objectives and policies within Strategic Direction 5 to determine alignment and implementation of the objectives and policies.

The following table sets out the relationship between the objectives and policies within section 2.5. it should also be noted that there are links between objectives in the wider chapter and these policies.

Objectives	Policies
2.5.2.1	2.5.3.1, 2.5.3.5
2.5.2.2	2.5.3.1, 2.5.3.2,
2.5.2.3	2.5.3.3, 2.5.3.4
2.5.2.4	2.5.3.2, 2.5.3.3