

Tēnā koutou,

Thank you for the opportunity to be heard today.

1. My name is Angela Bell. I have a masters degree and first class honours in resource and environmental planning. I am a Senior Policy Analyst, having worked in territorial and regional government, as well as central government. I am currently working in the area of natural hazards and climate change. Overall I have worked for 20 years in resource management policy.
2. I am seeking that Plan Change 32 consider the National Policy Statement for Highly Productive Land(NPS-HPL) and that the National Adaptation Plan (NAP) and the Emissions Reduction Plan(ERP) are given regard as required in the 30 November 2022 amendment to the Resource Management Act.
3. I am seeking that the Plan Change 38 (Chapter of the Taupo District Plan) include as a key strategic or significant resource management matter for the district, strategic direction for the rural environment that includes the proposed rural lifestyles environment which sit within the rural environment.

More detail of the changes sought

1. I seek that the National Adaptation Plan and Emissions Reduction Plan direction be incorporated into Plan Change 38, section on Climate Change, and also into other strategic direction where applicable, such as a new section on the Rural Environment. As part of this, I also seek it includes, amongst other things:
 - a. the impacts of both natural hazards and the effects of climate change, which include climate change effects that exacerbate natural hazards and those that have more gradual permanent impacts, such as water security
 - b. nature-based solutions be given priority in line with the both the NAP and ERP and the Waikato Regional Policy Statement direction in UFD-AER15 and UFD-AER16
 - c. that in addition to policy 2.4.3.4, a policy is introduced that subdivision and development in the rural environment is **located** and designed in a manner which considers the need to reduce greenhouse gas emissions associated with development and resulting land use, or similar.
 - d. integrating climate change policy within a rural section in in Chapter 2 to provide direction for the Plan Change 42 rural environment, in particular whether the location and type of subdivision in the rural environment would exacerbate climate change mitigation and led to maladaptation.
 - e. the need to reduce existing and future risks, including cumulative, to natural hazards and the effects of climate change.
2. I seek that the key strategic matters in Plan Change 38 include a section on the rural environment, as well as the relationship with rural residential, to provide strategic direction for the District Plan, in particular Plan Change 42. That this rural section also includes the consideration of the integration and the relationship with other strategic matters within Chapter 2. As part of this section the following content should be included that:

- a. identifies that subdivision should protect the primary production capability and life supporting capacity of air, water, soil, and ecosystems for future generations, or similar, and include the significance of this within the context of climate change,
- b. it acknowledges and addresses the issues exacerbated by the permissive nature of the operative district plan, this includes rural character and the relationship to the proposed rural lifestyle environment and reverse sensitivity,
- c. the ability for vulnerable communities to adapt and respond to natural hazards and the effects of climate change be a consideration for development and activities in the rural environment,
- d. identifies the tension between residential/rural lifestyle development and primary production for the demand for fresh water, and how this will be strategically managed, particularly with climate change, and impact existing use rights. This aligns with NPS- HPL 3.2 and the requirement for a catchment management plan which should be included as part of a growth strategy or structure plan process.
- e. Objective 2.1 and the 2.2 policies, the intention in Part 3: implementation, of the NPS-HPL should be incorporated to provide strategic direction for the rural environment and highly productive land,
- f. 3.13 of the NPS-HPL direction on reverse sensitivity and cumulative effects and including the required consideration of cumulative effects of subdivision on the availability and productive capacity of highly productive land.
- g. a comprehensive growth strategy or structure plan, including an assessment **(that must not take into account the potential economic benefit of using the highly productive land for purposes other than land-based primary production – NPS-HPL)** process, be required for the rezoning of rural land that is not primarily for primary production purposes, such as the proposed rural lifestyle, which is consistent with Taupo District 2050 and Waikato Regional Policy Statement,
- h. 3.7 and the criteria in 3.10 of the NPS-HPL should be applied to an assessment of proposed rural lifestyle environment rezoning of highly productive land.

Planning reports

1. The Taupo District Council Section 42A of the RMA Report BY ROWAN SAPSFORD, dated 3 July, recommends changes to Urban Form and Development to address submitters concerns on the lack of strategic for the rural environment. This is on pages 93-94 of the report. In addition, there recommended changes to the section on climate change.
2. The recommended changes to the section on Urban Form and Development do not adequately provide strategic direction for the rural environment nor do they provide for the strategic direction or relationship and tensions between residential and rural lifestyle subdivision in the rural environment. They also do not provide direction for the unique reverse sensitivity, cumulative effects, consideration of future generations in relation to the productive capacity of rural land and rural environment. Without the strategic intent, including the direction in the NPS-HPL, for the rural environment it will be difficult to implement the objectives and policies in the Urban Form and Development section where they relate to the rural environment and rural lifestyle environment, similar to the Climate Change.

3. The objectives and policies in the Plan Change 42, do not adequately provide this strategic direction and do not provide for the relationship with NPS-HPL, the NAP and ERP, nor Taupo 2050. It also treats rural lifestyle environment as distinct from the requirements for urban or residential land use and therefore the link to the strategic direction for in Plan Change 38 for Urban Form and Development and Climate Change in the strategic direction is not made in Plan Change 42. The criteria used for urban or residential development in the rural environment found elsewhere such as the NAP, ERP, NPS-HPL, WRPS, and Taupo District 2050 are also not well applied to Plan Change 42, and in particular the rural lifestyle environment, leaving a gap in the District plan for this direction.
4. The proposed plan changes continue to treat the rural environment as distinct from the rural lifestyle environment, including in character, without acknowledging the intrinsic relationship between them both as the fragmented rural lifestyle environment sits within the rural environment. This is evident particularly due to the intention for the rural lifestyle environment to be self sufficient and not to connected to reticulated waste or drinking water and the sharing of infrastructure for power and roads.
5. The recommended amendments in Plan Change 38 in the section on climate change do not specifically consider the NAP or ERP. The policy 2.4.2.4 does not include that subdivision and development in the rural environment needs to consider reduction in greenhouse gases. The policies don't include prioritisation of nature-based solutions. Policies do not reflect the need to reduce existing and future risks, including cumulative, to natural hazards and the effects of climate change.

SUPPORTING EVIDENCE

6. The vast majority of Taupo District is zoned rural and supports a thriving primary sector contributing to the district and national economy. The primary sector is the largest contributor to the Taupo economy besides tourism prior to covid and significant employer ¹. It was the mainstay for the local economy during covid.
7. The rural environment is also the main location for natural values and landscapes and supports the vast majority of indigenous biodiversity. There a numerous resource management issues facing the rural environment, including those identified as other strategic resource management matters in Plan Change 38. For example, urban form and development and climate change. Yet only the infrastructure section directly mentions the rural environment and the vital relationship of infrastructure to its function.
8. The lack of recognition and protection for the rural environment in Plan Change 38, particularly from inappropriate subdivision and development, which has a range of cumulative effects and restricts the opportunities for future generations, risks exacerbating the issues identified that are caused by existing permissive District Plan. There is a need for good strategic planning for the rural environment to ensure that existing issues are not perpetuated and that the District Plan is future focused and provides resilience to the big issues like climate change.

¹ Geothermal is the solution: How a small town in New Zealand (Taupo) is growing the prosperity of its people using geothermal resources, K. Hawker-Green, A. Blair and M. McCaw, Proceedings World Geothermal Congr4ess 2020.

9. Climate change is progressively an issue for the district and has multiple cross cutting impacts. The RMA now requires that the National Adaptation Plan (NAP) and Emissions Reduction Plan (ERP) are given regard. The NAP provides direction for existing and new development to adapt and reduce risks to natural hazards and the effects of climate change. Similarly, the ERP to mitigate greenhouse gas emissions.
10. Highly productive land is a finite resource and it is recognised that non-primary production uses such as residential/rural lifestyle permanently reduces the ability of the land to be used for primary production and can also impede the activities and resources used for primary production. The National Policy Statement – Highly Productive Land also recognises that in certain circumstances that land other than LUC 1, 2, or 3 can be classified as highly productive.
11. The following content of this evidence brings together supporting information for the changes sought to Plan Change 38 and consequently also Plan Change 42. My original submission is in Appendix 1.

Resource Management Act 1991

12. Providing a section in Chapter 2 Strategic Directions for the rural environment to recognise and protect for future generations, the productive capacity of rural land is consistent with the RMA s5 and s7. The rural environment, particularly the life supporting capacity of soils, access to water, should be protected from inappropriate subdivision and its cumulative effects, for the benefit of current and future generations.
13. The purpose of the RMA (s5) includes the protection of natural and physical resources in a way and rate that enables people and communities to provide for their well-being, while –
 - (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*
14. In addition, s7 requires particular regard to any finite characteristics of natural and physical resources.
15. The identified rationale for the proposed expansive rural lifestyle environment as identified in the Plan Change 42, is primarily demand for rural lifestyle living within the Rural Environment. It appears to be driven to encourage economic development as opposed to realistically market driven. The Taupo Rural Lifestyle Assessment 2019 by Property Economics, supporting the S32 report, concluded that there was enough rural lifestyle choice to accommodate growth over the next 30 years and that *“the council should not develop a policy framework that may fuel lifestyle growth.”*
16. The proposed rural lifestyle environment will restrict future generations from accessing the right to use soils and water for primary production and may contribute to limiting the life-supporting capacity of water and soils through cumulative effects, such as those from wastewater and access to fresh water. These restraints are increasingly important as the effects of climate change escalate. Wastewater and

access to quality fresh water are already an issue in the district outside of reticulated systems.

17. I seek that strategic direction be included for the rural environment in proposed Chapter 2 Strategic Directions, that identifies that subdivision and development should protect the primary production capability and life supporting capacity of air, water, soil, and ecosystems for future generations, or similar, and include the significance of this within the context of climate change. That exceptions to this should be limited through a structure or strategy and in line with the criteria in the NPS-HPL.

Disconnect with the rural environment at the proposed strategic directions

18. Providing strategic direction for Taupo District's rural environment in Plan Change 38 would better integrate the other significant resource matters covered in chapter 2 and provide a more cohesive direction for Plan Change 42 with these matters. Currently there is a disconnect with many of the objectives and policies in Plan Change 38 and the objectives, policies, and rules in Plan Change 42.

For example,

Objective 2.4.2.1

"Subdivision, use and development of land in Taupo District will result in positive climate change outcomes",

and

2.4.3 Policy

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

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

3. Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.

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

19. These policies are not considered in the preamble or the objectives, policies, or rules of Plan Change 42, yet the rural environment and rural lifestyle environment are not immune to the effects of climate change. Land use activities and development, particularly rural lifestyle, will also have implications for climate change mitigation.
20. I seek that the key strategic matters in Plan Change 38 include a section on the rural environment, as well as the relationship with rural residential, to provide strategic direction for the District Plan, in particular Plan Change 42. That this rural section also includes the consideration of the integration and the relationship with other strategic matters within Chapter 2.

District Plan Monitoring Report and Issues identified 2020

21. Taupo District Council 'District Plan Monitoring Report and Issues Identified -2020' page 24 identifies the rural environment as a strategic issue and that:

"The permissive framework in the operative District Plan has resulted in different character and in different parts of the rural area as a result of the development of a range of activities" as well as "areas of conflict between land uses that can reduce the amenity value of the rural area". This has resulted in "those not actively working in the rural areas are likely to be less tolerant of productive activities like forestry operations, stock odour or the spraying of wastewater on paddocks within the immediate vicinity of their residence."

22. Given the permissive nature of the current operative plan, particularly in relation to subdivision in the rural environment, and the tension and range of resource management issues that are exacerbated as a result, the operative Taupo District Plan, would benefit from better strategic direction for the rural environment in Chapter 2, Strategic Directions. This would support integration of issues and policy direction for the rural environment in other chapters and provide strategic direction for the rural chapter. A new rural environment section in proposed Chapter 2 should also acknowledge and address the issues exacerbated by the permissive nature of the operative district plan, this includes the relationship of rural character with that of rural lifestyle character as currently the policies in Plan Change 42, view them as discrete (Objective 3b.2.2, and 3b.3.1) and reverse sensitivity.

National Adaptation Plan and Emissions Reduction Plan

23. The RMA was amended on 30 November 2022 to require territorial authorities to have regard to the National Adaptation Plan (August 2022) (NAP) and the Emissions Reduction Plan (May 2022) (ERP). Although the RMA was not amended until November 2022 to include this requirement, both documents were available prior to the Plan Change 32 notification, as was the RMA Amendment Act 2020. Although there is no legal effect, it would be effective and efficient to align plan change 38 and subsequently plan change 42 with the direction in the NAP and ERP.
24. Both the ERP and NAP identify issues and priorities, including those that directly impact the rural environment. Although the exacerbation of natural hazards and their consequences is an effect of climate change, there are other impacts. For example, *food and fibre businesses and rural communities are especially vulnerable to both acute climate events and more gradual climate change impacts that affect water availability and security* (NAP pg103).
25. I seek that the impacts of both natural hazards and the effects of climate change (which includes climate change effects that exacerbate natural hazards and those that have more gradual permanent impacts, such as water security) be considered within Plan Change 38, including within an additional rural environment matter.
26. I also seek that nature-based solutions be given priority in line with the both the NAP and ERP in the objectives and policies in Plan Change 38. This is consistent with the

Waikato Regional Policy Statement direction in UFD-AER15 and UFD-AER16 which seeks increased adoption of low-impact stormwater design and increased examples of green/sustainable technologies in the Waikato region.

27. I seek that in addition to policy 2.4.3.4, a policy is introduced that subdivision and development in the rural environment is **located** and designed in a manner which considers the need to reduce greenhouse gas emissions associated with development and resulting land use, or similar.
28. I seek that the ability for vulnerable communities to adapt and respond to natural hazards and the effects of climate change be a consideration for development and activities in the rural environment.
29. Considering the ability of vulnerable communities to cope and respond to natural hazards and the effects of climate change and not increasing risk to such events are key considerations in the NAP and the National Disaster Resilience Strategy. This is also part of the work in response to the severe weather earlier this year (cyclone Hale and Gabrielle). Consideration should be given to the type, location, and vulnerability of development and activities in the rural environment, particularly rural lifestyle.
30. I worked as the National Rural Support Trust Coordinator, helping to establish the Trusts and supporting their work in natural disasters, including earthquake, flood, wildfire, and drought. The lifestyle community was always the most vulnerable in the rural environment. With neither the council's or Ministry for Primary Industries with the capacity or understanding of how to support them.
31. Mark Barton Doctorate Thesis (Disaster risk management in rural New Zealand), 2020, identified lifestyle block owner/occupiers as a vulnerable community. Lifestyle blocks occupiers "*have varying capacities, resources, and equipment able to respond to the impacts of natural hazards*" (page 198) and were found to have different values and priorities to other rural populations, including higher expectations for external help following a disaster. "*That while lifestyle block residents may reside in rural areas, they are not necessarily involved in or connected to local industries or social networks. This presents a unique challenge to rural response and recovery operations*" (page 71).
32. In disaster events lifestyle block owners generally struggle with mental and physical health (being isolated, not having access to services, including medical services), property reinstatement (fixing fences, drinking (including for stock), waste, and storm water services, tracks) and animal welfare. My husband and I farm sheep, beef, and dairy. My husband is regularly called upon by lifestyle block owners for advice and to actually attend to farm maintenance and animal welfare. In drought conditions lifestyle blocks are one of the main concerns for animal welfare and we have noticed the increase in help he is asked to provide during these events to lifestyle block owners that use stock to keep grass growth under control.
33. Expansion of rural lifestyle development will increase the demand and competition for water, with rural lifestyle (mainly non-primary production) having priority for human drinking water, over primary production. This tension will likely increase if not strategically managed, particularly with climate change, and will impact existing use

rights. This is an issue that could be identified and addressed through including a section for the rural environment in the Strategic Directions Chapter of the District Plan.

34. The ERP includes reduction of greenhouse gas emissions by considering land use planning, and related transport and infrastructure needs for development. The Plan Change 42 has not adequately considered the context of climate change mitigation nor adaptation in the rural and rural lifestyle environment, including the relationship between the two environments. Climate change, including the proposed Climate Change objectives and policies in Plan Change 38, did not form part of the criteria used to form the proposed new rural lifestyle environment zone.
35. Fragmentation of residential development in the rural area, such as that proposed by the zone for the rural lifestyle environment, will increase greenhouse gas emissions, adding to the rural environment and districts profile, increase infrastructure requirements and costs for the district.
36. The rural lifestyle environment, will be largely residential in nature due to the lot size and the accommodation of two dwellings. Residents will likely work off property to support their income as the land size proposed has limited primary production capability, and families will commute to town for schooling and activities. Public transport options will be limited due to the fragmented nature of the proposed development. They will contribute to the congestion in town, likely require domestic waste transportation, wider roads for safety, and other amenities that residential and more urban communities expect, increasing greenhouse gas emissions and contributing to the effects of climate by inefficient land use. This is an important consideration for Taupo, given most of the rural lifestyle environment proposed is on the congested western side of town and the most amenities that residents need to access are located in town.
37. Greenhouse gas emissions will become increasingly important in the future, especially if targets are set at a district and regional level.
38. Integrating climate change policy within a rural section in in Chapter 2 would provide direction for decision makers within the rural chapter and in particular whether the location and type of subdivision in the rural environment, including rural lifestyle, would exacerbate climate change mitigation and led to maladaptation.
39. The consideration of the NAP and the ERP in the strategic direction is particularly important when considering new development that will be particularly vulnerable to the effects of climate change, including increasing risk of natural hazards, and the exacerbate greenhouse gas emissions.
40. I seek that strategic direction proposed Chapter 2 of the District Plan has regard to the ERP and NAP, including within a new rural environment section, would assist in proactively addressing the effects of climate change for the district and reduce greenhouse gas emissions.

National Policy Statement for Highly Productive Land (NPS-HPL)

41. The NPS-HPL was approved on the 12 September 2022. Although the proposed plan changes were notified slightly beforehand, the NPS-HPL is relevant to the content of the proposed changes, particularly Plan Changes 38 and 42 and therefore should be taken into account to avoid the need for further plan changes to accommodate NPS-HPL direction.
42. Although not all land in Taupo District is identified as highly productive, much of the land in the rural environment and proposed rural lifestyle environment has productive value with LUC class 6-4 supporting a thriving dairy and dry stock sector. [Land Use Capability » Maps » Our Environment \(scinfo.org.nz\)](#). The smaller rural blocks around Taupo township provide dairy grazing, calf rearing, dry stock grazing, and deer farming, which contributes to the primary sector. In addition, there are range of rural contracting businesses that support the primary sector located in the peri-urban rural environment.
43. It is considered that Rural lifestyle would satisfy the definition of urban in the NPS-HPL and the WRPS, as low density residential or large lot residential as the primary land use is for residential purposes.
44. 3.2 of the NPS-HPL includes managing the effects of subdivision by considering how land-based primary production interacts with freshwater management at a catchment level, and taking a long-term strategic approach to protecting and managing highly productive lands. Taupo District 2050 and the WRPS both support this approach, whereby a structure plan or similar is required for rural lifestyle development, including infrastructure and freshwater management should be considerations supporting the direction in the NPS-HPL.
45. 3.4 of the NPS-HPL states that Regional councils may map land that is in a general rural zone or a rural production zone, but is not LUC 1, 2, or 3 land, as highly productive land if the land is, or has the potential to be (based on current uses of similar land in the region), highly productive for land-based primary production in that region, having regard to the soil type, physical characteristics of the land and soil, and climate of the area. This may also include small, discrete areas of land that are not LUC 1, 2, or 3 land, but are within a large and geographically cohesive area of LUC 1, 2, or 3 land, may be included. Plan Change 42 and the rezoning of rural land to rural lifestyle may restrict the ability of the regional council to comply with the intentions of the NPS-HPL and identification and mapping of LUC 1, 2, or 3, land that is has the potential to be (based on current uses of similar land in the region), highly productive for land-based primary production, and land that supports LUC 1, 2, or 3, including small areas of land.
46. 3.6 provides for particular circumstances for urban subdivision of highly productive land for Tier 1 and 2 councils as identified in the National Policy Statement for Urban Development (NPS-UD). Taupo District is not a Tier 1 or 2 council. 3.7 of the NPS-HPL states that territorial authorities must avoid rezoning land as rural lifestyle, unless 3.10 is met. A key consideration is that any evaluation of options "**must not take into account the potential economic benefit of using the highly productive land for purposes other than land-based primary production**". 3.7 and the

criteria in 3.10 of the NPS-HPL should be applied to the proposed rural lifestyle environment rezoning of highly productive land and ideally form part of the policies in Plan Change 32 through the inclusion of a section on the rural environment.

47. 3.13 provides direction on reverse sensitivity and cumulative effects and includes the required consideration of cumulative effects of subdivision on the availability and productive capacity of highly productive land. Given the fragmented and expansive nature of the proposed rural lifestyle environment, the cumulative effects should be considered collectively rather than on each location. This type of assessment should ideally be part of a comprehensive structure or strategic plan process which I seek to be included in as part of a new section for the rural environment in Plan Change 2.
48. It's sought that Objective 2.1 and the 2.2 policies, the intention in Part 3: implementation, of the NPS-HPL should be incorporated into a Plan Change 38, as part of providing strategic direction for the rural environment and highly productive land.

TDC 2050 and the Regional Policy Statement

49. The District Growth Management Strategy, Taupo District 2050, identifies objectives:
- Prevent the urbanisation of the rural environment
 - Protect the functional activities within the rural environment
50. Actions include:
8. Maintaining the policy approach of controlling fragmentation of the rural environment below 10ha
51. Although the current proposed plan changes intentions are to tighten subdivision of rural environment land, the permissive nature of the current operative plan (refer to *District Plan Monitoring Report and Issues identified 2020*), has already led to fragmentation of the rural environment through proliferation of lifestyle subdivision. The proposed rural lifestyle environment exacerbates the rural environment fragmentation by using existing smaller lots formed by operative district plan as criteria to inform the location of the zone. Given that the proposed rural residential environment will largely be residential in nature (non-productive 2 dwellings/2 hectares) this will urbanise and impede on the functional activities of the rural environment, such as transport routes which can't be mitigated through the provision of land use buffers as proposed.
52. The definition of rural lifestyle is consistent with urban in the Waikato Regional Policy Statement (WRPS).
53. UFD-F8 identifies that future growth is managed in a way that recognises Taupo District 2050 by ensuring that patterns of urban growth are consistent with the strategic direction and avoiding urban development in the rural environment outside of the urban growth areas to prevent a dispersed pattern of settlement and the resulting inefficiencies in managing resources. Taupo District 2050, also includes ensuring that urban development of an identified urban area occurs by way of a Taupo District 2050 structure plan process and associated plan change process.

54. In areas where significant growth is occurring or anticipated, UFD-M6 of the WRPS, identifies that territorial authorities should develop and maintain growth strategies which identify a spatial pattern of land use and infrastructure development and staging for at least 30 years.

55. UFD-M5 of the WRPS identifies that district plan shall ensure that rural residential development is directed away from natural hazard areas, regionally significant industry, high-class soils, primary production activities on those high class soils, electricity transmission, locations identified as likely renewable energy generation sites and from identified significant mineral resources and their identified access routes.

56. As a consequence of the direction for urban development in the WRPS there are a number of anticipated environmental results, including that:

UFD-AER1	New development is not subject to intolerable levels of risk from natural hazards
UFD-AER3	Vehicle kilometres travelled per capita are reduced
UFD-AER5	Indigenous biodiversity in urban (including rural-residential) areas is improved
UFD-AER6	Most rural-residential development occurs in identified areas
UFD-AER8	Fragmentation of high-class soils is reduced

57. The rural lifestyle development is inconsistent with the areas identified for growth in Taupo District 2050 and has not gone through a structure plan process as identified in this document and the WRPS. The significant amount of rural land that is proposed to be rezoned as rural lifestyle should be managed in a strategic manner consistent with this direction given the impacts, including to infrastructure. loss of primary production soils and greenhouse gas emissions.

58. Including a rural section in proposed Chapter 2 of the district plan would provide objectives and policies with strategic direction/intent for the rural environment and the proposed rural lifestyle environment which sits within it. Currently the objectives and policies in plan change 42 do not have this strategic component and more or less treat the rural lifestyle environment as something that is distinctly separate to the rural environment which surrounds it. Ideally a comprehensive growth strategy or structure plan process would be followed given the significant size and fragmented location of the proposed rural lifestyle environment. Providing such direction in a rural environment section of proposed chapter 2 of the district plan would direct a more comprehensive approach rather than an ad hoc approach based on mainly on section size and perceived demand, as is taken currently.

Appendix 1: Original Submission

Plan Change 38 to the Taupo District Council Plan Strategic Directions
Oppose
The plan change does not provide strategic direction on the rural environment or rural-residential zoning. Primary production and the rural environment is facing a range of significant resource pressures many of which are cross cutting with the strategic matters covered in Plan Change 38, yet these sections appear to only consider the urban environment.
Reference to the National Policy Statement for Highly Productive Land is not considered.
Reference to the National Adaptation Plan and outcomes, including natural hazards is inconsistent.
Plan Change 42 to the Taupo District Plan General Rural and Rural Lifestyle Environments Including Rural Lifestyle maps
Oppose
The plan change does not adequately protect the rural environment from the effects of subdivision, including but not limited to, consideration of infrastructure, reverse sensitivity, climate change and natural hazards, impacts on character, ability for primary production
The plan change is inconsistent with Taupo 2050 and the Regional Policy Statement
The plan change is inconsistent or doesn't adequately take into account with the National Adaptation Plan and Emissions Reduction Plan or other applicable national direction
The plan change is inconsistent with Taupo 2050
The plan change is inconsistent with Waikato Regional Policy Statement
The plan change does not consider adequately the constraints of areas considered for rural residential zoning