

**BEFORE THE HEARING PANEL FOR TAUPŌ DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of a submission by Contact Energy Limited on Proposed  
Plan Change 38 to the Taupō District Plan relating to  
Strategic Directions

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**STATEMENT OF EVIDENCE OF MARK BULPITT CHRISP**

**ON BEHALF OF CONTACT ENERGY LIMITED**

**PLANNING**

**9 AUGUST 2023**

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## QUALIFICATIONS AND EXPERIENCE

- 1 My full name is **Mark Bulpitt Chrisp**. I am a Partner and a Principal Planner in the Hamilton Office of Mitchell Daysh Limited, a company which commenced operations on 1 October 2016 following a merger of Mitchell Partnerships Ltd and Environmental Management Services Ltd (of which I was a founding Director when the company was established in 1994 and remained so until the merger in 2016).
- 2 My evidence is given on behalf of Contact Energy Limited (**Contact**) in relation to Proposed Plan Change 38 (**PC38**) to the Taupō District Plan (**TDP**).
- 3 I have the following qualifications and experience relevant to the evidence I shall give:
  - a. I have a Master of Social Sciences degree in Resources and Environmental Planning from the University of Waikato (conferred in 1990) and have more than 33 years' experience as a Resource Management Planning Consultant;
  - b. I am a Certified Commissioner under the Ministry for the Environment's 'Making Good Decisions' course;
  - c. In addition to my professional practice, I am an Honorary Lecturer in the Department of Geography, Tourism and Environmental Planning at the University of Waikato. I am also the Chairman of the Environmental Planning Advisory Board at the University of Waikato, which assists the Environmental Planning Programme in the Faculty of Arts and Social Sciences in understanding the educational, professional and research needs of planners;
  - d. I have appeared as an Expert Planning Witness in numerous Council and Environment Court hearings, as well as several Boards of Inquiry (most recently as the Expert Planning Witness for the Hawke's Bay Regional Investment Company Ltd's proposed Ruataniwha Water Storage Scheme);
  - e. I appeared as an Expert Planning Witness in the Board of Inquiry hearings that led to the granting of the resource consents for the

construction and operation of Te Mihi Power Station and the Tauhara Power Station (and associated steamfield activities);

f. Environmental issues associated with the development, expansion, and on-going operation of industrial activities, particularly within the energy sector, is one of my specialties. I have been a planning advisor for the following industrial / energy projects over the last three decades:

- i. Wairākei Binary Plant (1994 – 1998);
- ii. Te Rapa Dairy Factory Expansion and Co-generation Power Plant (1996 – 1997);
- iii. Ohaaki Geothermal Power Plant Re-consenting (1998 – 1999);
- iv. Tauhara I Geothermal Power Development (now called Te Huka Power Station) (1999 – 2000);
- v. Tongariro Power Scheme Re-consenting – advising the Waikato Regional Council (2000 – 2002);
- vi. Wairākei Geothermal Power Plant Re-consenting (1999 – 2007);
- vii. Resource consents for exploratory drilling on the Wairākei - Tauhara Geothermal System (2007);
- viii. Resource consents for the Te Mihi Geothermal Power Station (2008);
- ix. Resource consents for the Tauhara II Geothermal Project (2010);
- x. Resource consents for the ongoing operation of the Ohaaki Geothermal Power Plant (2013); and
- xi. Resource consents for the ongoing operation of the Wairākei Geothermal Power Scheme (referred to as GeoFuture) (2019 – 2022).

4 I am very familiar with the Taupō District. I have worked for Contact and other clients within the Taupō District over the last 30+ years. Through this work I also have considerable experience with the TDP and other statutory

documentation relating to the management of natural and physical resources within the Taupō District.

- 5 In relation to statutory planning matters, I have been an advisor to Contact in relation to the Waikato Regional Policy Statement, the Waikato Regional Plan, and the TDP as they have evolved over the last three decades. This has included, in particular, the formulation of planning provisions relating to the management of geothermal resources and associated uses of those resources in the Waikato Region and the Taupō District.
- 6 I am a member of the:
  - a. New Zealand Planning Institute (Full Member) (NZPI);
  - b. New Zealand Geothermal Association; and
  - c. Resource Management Law Association.
- 7 I confirm that I have read the 'Code of Conduct' for expert witnesses contained in the Environment Court Practice Note 2023. My evidence has been prepared in compliance with that Code. In particular, unless I state otherwise, this evidence is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

## **BACKGROUND**

- 8 In preparing my evidence, I have:
  - a. Reviewed the notified version of PC38;
  - b. Liaised with other electricity generators that operate within the Taupō District;
  - c. Prepared the submission on PC38 by Contact;
  - d. Participated in meetings with TDC planning personnel in relation to the issues raised in Contact's submission;
  - e. Reviewed the Overarching s.42A report prepared by Ms Hilary Samuel on behalf of TDC covering Plan Changes 38 - 43; and
  - f. Reviewed the s.42A report prepared by Mr Rowan Sapsford on behalf of TDC specifically relating to PC38.

## **SCOPE OF EVIDENCE**

- 9 The purpose of my evidence is to provide the planning rationale for the changes sought to PC38 in Contact's submission, particularly in relation to the changes that are not supported by Mr Sapsford in his s.42A report.

## **ENERGY CHAPTER**

- 10 Contact's submission sought the inclusion of an Energy Chapter in the Taupō District Plan in accordance with the National Planning Standards, either as a result of PC38 or by way of a subsequent Proposed Plan Change in the near future.
- 11 In the Overarching s.42A report, Ms Samuel states that an Energy Chapter is "anticipated to be developed as part of Bundle 2 or potentially additional bundles if necessary".
- 12 In the s.42A report specifically relating to PC38, Mr Sapsford states that "It is anticipated that this chapter will form part of a later stage of the sectional review of the TDP."
- 13 A commitment on the part of TDC that there will be an Energy Chapter proposed as part of the next tranche of plan changes will go a long way to addressing the issues raised by Contact in its submission on PC38. Contact has also provided an indication to TDC that it would be happy to contribute to the drafting of a proposed Energy Chapter. Nevertheless, it is still important that the issues raised by Contact in its submission on PC38 are addressed in the interim to avoid a policy vacuum or inadequate policy coverage. These issues are addressed in the balance of my evidence as follows.

## **STRATEGIC DIRECTION 3 - URBAN FORM AND DEVELOPMENT**

- 14 An important aspect of the urban form of Taupō is the East Taupō Arterial being an 'urban fence' separating urban activities to the west (particularly residential activities) from industrial and rural activities to the east including renewable electricity generation activities. It is important to reinforce this as an enduring objective in the District Plan. To that end, Contact sought that a new objective be added to Section 2.3.2 as follows:

"The East Taupō Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities."

15 Mr Sapsford does not support the addition of this objective on the basis that:

“Higher level guidance is provided through the strategic directions which reference the 2018 District Wide Growth Management Strategy, TD2050.”

16 In my opinion, the part of the Strategic Directions chapter of the TDP focusing on Urban Form and Development is the appropriate place for key aspects of TD2050 to be given some statutory weight by being reflected in the provisions of the TDP. This includes the East Taupō Arterial being identified as an urban fence as discussed in Section 1.1 of TD2050 (reproduced as **Annexure 1** of my evidence). This is the same approach that WRC has taken whereby the key aspects of Future Proof are included in the Waikato Regional Policy Statement (**Waikato RPS**).

17 The separation of incompatible activities is one of the most fundamental principles of sound planning and resource management practice. The ability to utilise the Wairākei-Tauhara Geothermal System for renewable electricity generation purposes, unfettered by the establishment of incompatible activities, is recognised as a matter of both regional and national significance in the Waikato RPS and the National Policy Statement for Renewable Electricity Generation (**NPS-REG**). The District Plan has a role to play in implementing the RPS and the NPS-REG.

18 Under the heading “Incorporating provisions for renewable electricity generation activities into regional policy statements and regional and district plans”, the NPS-REG includes the following policy:

“POLICY E4 - Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for the development, operation, maintenance, and upgrading of new and existing electricity generation activities using geothermal resources to the extent applicable to the region or district.” (emphasis added)

19 The requirement to include objectives, policies, and methods in district plans to address the subject matter of Policy E4 in the NPS-REG is not achieved by simply cross-referencing the higher order (or other) planning instruments as proposed by Mr Sapsford. Part of achieving Policy E4 is ensuring that incompatible activities are not able to establish or expand in, or in close proximity to, areas that have been identified and/or consented for renewable

electricity generation activities using geothermal resources. This is reinforced by another policy in the NPS-REG as follows:

“POLICY D - Decision-makers shall, to the extent reasonably possible, manage activities to avoid reverse sensitivity effects on consented and on existing renewable electricity generation activities.”

20 The Waikato RPS includes the following method (which is to give effect to Policy 9.1 / GEO-P1 in the Waikato RPS<sup>1</sup>):

“9.1.7 Use of land and non-geothermal water within geothermal systems

Regional and district plans shall ensure that:

- a) the development and uses of non-geothermal water; and
  - b) new development and uses of land
- within and adjacent to all geothermal systems are compatible with the purpose for which each geothermal system is classified.”

21 The Wairākei-Tauhara Geothermal System is classified in the Waikato Regional Plan as a Development Geothermal System. Policy 9.3 / GEO-P3 in the Waikato RPS states:

“Development Geothermal Systems shall be managed in a way that enables large-scale use and development of geothermal energy and water ...” (emphasis added)

22 In summary, in my opinion, forming part of a wider suite of planning provisions, the new objective sought by Contact in relation to the East Taupō Arterial being an urban fence seeking to maintain the separation of incompatible activities is

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<sup>1</sup> Policy 9.1 / GEO-P1 in the Waikato RPS is:

Sustainably manage the Regional Geothermal Resource in a way that provides for multiple uses and

the extent and variety of the region’s geothermal features including by:

a) classifying geothermal systems for management based upon:

- i) system size;
- ii) the vulnerability of Significant Geothermal Features to extractive uses;
- and
- iii) existing uses;

b) managing the effects of development and use of land and non-geothermal water on the Regional Geothermal Resource; and

c) allocating some of the Regional Geothermal Resource for protection and some for take, use and discharge.

an entirely appropriate and sensible way of giving effect to the NPS-REG and the Waikato RPS as required by s.75(3) of the RMA.

- 23 Along similar lines, Contact sought that Objective 2.3.2.3 be amended as follows:

“Subdivision, use and development of land in appropriate locations which will have demonstrable social and cultural benefits to the District’s community will be supported.”

- 24 Mr Sapsford recommends that the addition of the words “in appropriate locations” not be added to the objective. In my opinion, the current wording of the objective is too absolute and problematic. It could facilitate outcomes that are contrary to the NPS-REG and Waikato RPS (discussed above). As currently worded, the objective commits TDC to support any proposal that will have demonstrable social and cultural benefits to the District’s community irrespective of the nature and magnitude of any adverse effects the proposal will create. As an example, a country club style retirement village located in the Rural Environment will have demonstrable social and cultural benefits to the District’s community, but it should not be supported if it is inappropriately located, e.g. on a Development Geothermal System beyond the urban limits.

#### **STRATEGIC DIRECTION 4 - CLIMATE CHANGE**

- 25 Contact sought changes to the introductory text of Strategic Direction 4 and an additional objective and two additional policies.
- 26 Mr Sapsford supports the changes proposed to the introductory text but does not support the additional objective and two additional policies on the basis that he considers the subject matter is already covered by other policies.
- 27 The subject matter of the objective and policies sought by Contact are only addressed at a high level of generality in the proposed version of PC38. Now is the opportunity to provide some strategic guidance as to desired tangible outcomes. By way of example, Objective 2.4.2 nebulously refers to “positive climate change outcomes”. This puts a cycle path in the same category as a geothermal power station and provides little strategic guidance in terms of the outcomes sought to be achieved. Contact is seeking an objective which specifies a well-defined outcome as follows:

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



28 The objective proposed above is particularly appropriate and relevant to the Taupō District which currently has 25 renewable electricity generation power stations within its boundaries (which will increase to 27 when Tauhara Power Station and Unit 3 at Te Huka Power Station are commissioned) and, as noted later in the s.42A report<sup>2</sup>, supplies about 27% of the country's total electricity demand. As noted in the evidence of Mr Stevens, the existing 25 renewable electricity generation power stations within the Taupō District generate up to 1,900 MW which is the equivalent of being able to provide electricity to approximately 1.9 million homes and businesses. I think it is fair to say that renewable electricity generation is one of the most significant and important industries in the Taupō District.

29 Similarly, and flowing on from the objective discussed above, instead of relying on a policy that talks about positive climate change outcomes being “supported and encouraged”, Contact is seeking stronger policies that “recognise and provide for” and “enable” specified outcomes as follows:

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

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

- adaptation required to mitigate risks from climate change
- provides for increased electricity output, or greater efficiency
- continued safe, efficient and secure operation.”

30 The additional policies sought by Contact seek to move the position from mere support and encouragement (akin to supporting your sports team from the sideline) to actually doing something tangible to achieve or at least facilitate the desired outcomes.

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<sup>2</sup> At para 215.

## **STRATEGIC DIRECTION 5 - SIGNIFICANT AND LOCAL INFRASTRUCTURE**

31 Contact proposed a change to Objective 2.5.2.2 as follows:

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

32 Mr Sapsford has proposed that the final words of the objective read: “... are recognised and ~~encouraged~~ provided for.”

33 That alternative amendment is acceptable in my opinion. Rather than just ‘sideline support’ (to use my sports analogy above), it now requires some affirmative action.

34 In contrast to the above, Mr Sapsford does not support the following change to Policy 2.5.3.2 sought by Contact:

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

35 I acknowledge Mr Sapsford’s point that Policy 2.5.3.2 covers nationally and regionally significant infrastructure beyond that which is the subject of, and has the benefit of, national policy instruments. He is correct that not all infrastructure enjoys the same level of support from higher order statutory documents. However, that is not a sufficient reason in my opinion to reject the change sought by Contact. From a planning perspective, why would a territorial authority not want to provide for nationally and regionally significant infrastructure?

36 Recognition is merely a cognitive process. In my opinion, the policy needs to take the next step and actually do something about that recognition, in this case, provide for the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.

## **STRATEGIC DIRECTION 6 - NATURAL ENVIRONMENT VALUES**

37 Contact’s submission sought an additional policy in relation to offsetting and compensation as a means to address the effects of renewable electricity generation developments on aspects of the natural environment as follows:

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

38 I acknowledge Mr Sapsford’s point about this matter being more comprehensively addressed as part of future plan changes, including the implementation of the recently released National Policy Statement for Indigenous Biodiversity. However, the interim policy position as set out in Strategic Direction 6 is heavily focused on protection, enhancement and restoration. There is no recognition of the reality that it is mostly impossible to develop large scale renewable electricity generation activities without causing some degree of adverse environmental effect. Nor is there any acknowledgement of the legitimate ability to address those effects by way of offsetting and compensation. The end result therefore lacks any strategic direction beyond protection, enhancement and restoration. Including the policy sought by Contact provides some balance in a manner which is consistent with Policy C2 in the NPS-REG which states:

“POLICY C2 - When considering any residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected.”

39 The inclusion of the policy sought by Contact is also consistent with Policy E4 in the NPS-REG and Method 9.1.7 in the Waikato RPS discussed above.

## **CONCLUSION**

40 The Taupō District has an abundance of natural and physical resources that are used, or planned to be used to a greater extent, for renewable electricity generation activities. The further development of renewable electricity generation activities is critical to decarbonising the economy and addressing climate change.

41 Until such a time as an Energy Chapter has been introduced into the TDP, it is important that the issues raised by Contact in its submission on PC38 are addressed in the interim to avoid a policy vacuum or inadequate policy coverage.

- 42 A key theme running through my evidence is the need for the objectives and policies in the Strategic Directions section of the TDP to move from a position of recognition and support for high level non-specific outcomes (which I have likened to sideline support as a sports spectator) to actually specifying some tangible desired outcomes and actions to achieve or at least facilitate specific outcomes.
- 43 The changes sought by Contact to PC38 are consistent with the requirements of the NPS-REG and the Waikato RPS. Furthermore, they promote sound resource management and planning practice including the separation of incompatible activities.
- 44 As requested by the Hearing Panel in paragraph 8 of Minute 5, attached to my evidence are two appendices as follows:
- Appendix A provides an evaluation of the changes sought by Contact in accordance with s.32AA of the RMA; and
  - Appendix B sets out a strike-through of the changes sought by Contact.

## Annexure 1 – Section 1.1 of TD2050



### 1.1 Background

Taupō District 2050 (TD2050) is a growth management strategy which outlines where Taupō District Council (Council) anticipates future urban growth to occur and the nature and scale of such growth.

TD2050 is a review of the original version of TD2050 (TD2050 (2006)) created in 2006. It has been more than ten years since TD2050 2006 was developed and there have been some significant shifts within the planning framework and in the population and demographic projections for the Taupō District, the region and New Zealand.

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.

**In the early 2000's Taupō was facing three key issues that drove the direction of TD2050 2006:**

- Council needed to change the way the District Plan managed the effects of urban growth. The Proposed District Plan had created an ad hoc approach to development of residential living opportunities in the rural areas. The case by case consideration of subdivisions made it difficult to take into consideration cumulative effects of new developments. There was also growing pressure on Council to extend the town's infrastructure but no certainty about where future development would take place.

- The ongoing use of the Wairākei Tauhara geothermal field by Contact Energy was creating tensions with the growth of Taupō town. The use of the geothermal field to generate electricity was resulting in some areas of subsidence. Council wanted to ensure the town could continue to grow without being adversely affected by that subsidence, while Contact Energy wanted to protect their rights to continued use of the resource.

- The funding for the East Taupō Arterial was in question due to concerns about the Council's management of urban growth. Council required a significant investment for the New Zealand Transport Agency (NZTA) to build the road, however NZTA was concerned uncontrolled urban expansion might undermine the investment.

To address these issues TD2050 2006 established a long-term vision and strategy for land use and development. This included identification of land to be rezoned for future urban growth and a requirement for detailed structure planning for the remaining future growth areas. This was supported by a clear signal that urban development in the rural areas would not be permitted to avoid the cumulative effects of uncontrolled growth. The strategy also identified the East Taupō Arterial as the "urban fence" to the east of Taupō town, to help secure funding for the new road and to reduce the impacts on the town's growth on the geothermal field.

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(yellow highlighting added).

## Appendix A – Section 32AA Evaluation of Changes Sought by Contact

In accordance with paragraph 8 of Minute 5, the following provides an evaluation of the changes sought by Contact in accordance with s.32AA of the RMA. In doing so, for the sake of consistency, I have followed the same format as presented in the s.42A report prepared by Mr Rowan Sapsford described<sup>3</sup> as follows:

*The s32AA further evaluation is done for each Strategic Direction and considers:*

- *Whether the amended objectives are the best way to achieve the purpose of the RMA.*
- *The reasonably practicable options for achieving those objectives.*
- *The environmental, social, economic, and cultural benefits and costs of the amended provisions.*
- *The efficiency and effectiveness of the provisions for achieving the objectives.*
- *The risk of acting or not acting where there is uncertain or insufficient information about the provisions.*

Like Mr Sapsford's evaluation, I have not included any analysis in relation to minor wording changes (such as the changes sought by Contact to the Introduction and Strategic Direction 1 – Tangata Whenua, 2.2 Strategic Direction 2 - Freshwater Quality / Te Mana O Te Wai) which are mostly correcting typos and grammar and/or minor wording changes. Nor have I provided any additional evaluation where the changes sought by Contact have been recommended for acceptance by Mr Sapsford and which are the subject of a s.32AA evaluation in his s.42A report.

### 2.3 STRATEGIC DIRECTION 3 URBAN FORM AND DEVELOPMENT

#### ***Whether the amended objectives are the best way to achieve the purpose of the RMA.***

The absence of an objective relating to the ETA as an urban fence, as proposed by Contact, leaves a policy vacuum and is not in accordance with the requirements of the NPS-REG. It therefore does not achieve the purpose of chapter (to provide strategic direction) nor the purpose of the RMA.

The proposed amendment to Objective 2.3.2.3 is necessary to achieve the purpose of chapter (to provide strategic direction) and the purpose of the RMA. In the absence of the wording proposed by Contact, perverse outcomes are likely to arise.

#### ***The reasonably practicable options for achieving those objectives.***

The option of including objective and the amended wording proposed by Contact will assist in the achievement of the outcome sought, whereas the absence of those provisions will not.

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<sup>3</sup> At para 24 of the s.42A report.

***The environmental, social, economic, and cultural benefits and costs of the amended provisions.***

The environmental and economic benefits of avoiding incompatible land uses on and in the vicinity of a geothermal resource of national significance which is classified as a Development Geothermal System to be used for renewable electricity generation are significant. In contrast, the costs of not protecting the resource and associated renewable electricity generation activities would be significant. This is particularly the case in the circumstances that existing and additional renewable electricity generation activities are required to decarbonize the economy in order to address climate change.

***The efficiency and effectiveness of the provisions for achieving the objectives.***

The additional objective and the amended wording proposed by Contact will increase the effectiveness of a key aspect of TD2050 by giving it some 'statutory teeth'.

***The risk of acting or not acting where there is uncertain or insufficient information about the provisions.***

There is no uncertainty or insufficiency of information. However, the risk of not acting in the manner proposed by Contact is that the absence of strong policy guidance will result in a greater chance of incompatible activities establishing or expanding in inappropriate locations.

## **2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE**

***Whether the amended objectives are the best way to achieve the purpose of the RMA.***

In a chapter of the TDP that is purporting to provide strategic guidance, it is better to clearly articulate the outcomes sought to be achieved rather than nebulous generalities. On that basis the new objective and two policies sought by Contact are a better way of achieving the purpose of the chapter and the RMA.

***The reasonably practicable options for achieving those objectives.***

Again, the inclusion of the provisions proposed by Contact are practicable options for achieving the objectives.

***The environmental, social, economic, and cultural benefits and costs of the amended provisions.***

The environmental, social, economic, and cultural costs of not addressing climate change in a tangible way will be significant. That is a key reason why the policy guidance to move the position from mere support and encouragement (akin to supporting your sports team from the sideline) to actually doing something tangible to achieve or at least facilitate the desired outcomes.

***The efficiency and effectiveness of the provisions for achieving the objectives.***

The greater level of specificity in the objective and policies proposed by Contact will more efficiently and effectively achieve the objectives.

***The risk of acting or not acting where there is uncertain or insufficient information about the provisions.***

There is no uncertainty or insufficiency of information. However, as noted above in relation to the issue of costs, the risk of not acting could result in significant adverse effects (i.e. if climate change is not addressed).

## **2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE**

***Whether the amended objectives are the best way to achieve the purpose of the RMA.***

The change to Policy 2.5.3.2 proposed by Contact seeks to better achieve the purpose of the objectives by moving the position from one of mere 'recognition' to take the next step and actually do something about that recognition, in this case, provide for the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.

***The reasonably practicable options for achieving those objectives.***

The important point here is that recognition does not achieve any tangible outcome. As noted above, the policy can only achieve the objective if it seeks to do something – in this case provide for the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.

***The environmental, social, economic, and cultural benefits and costs of the amended provisions.***

Environmental, social, and economic benefits will arise from actually achieving a specified outcome (i.e. by providing for them) rather than merely recognizing the functional and operational needs of infrastructure.

***The efficiency and effectiveness of the provisions for achieving the objectives.***

The amendment sought by Contact will be more efficient and effective as it seeks to achieve something rather than just recognise it.

***The risk of acting or not acting where there is uncertain or insufficient information about the provisions.***

There is no uncertainty or insufficiency of information. However, the risk of not acting in the manner proposed by Contact is that less, or nothing, is achieved.

## **2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES**

***Whether the amended objectives are the best way to achieve the purpose of the RMA.***

Staying silent on an important aspect of resource management is not the best way to achieve the objectives of the chapter or the RMA.



***The reasonably practicable options for achieving those objectives.***

The inclusion of the policy sought by Contact is a practical option to help achieve the objectives of the chapter or the RMA. Silence on that matter is not a practical option.

***The environmental, social, economic, and cultural benefits and costs of the amended provisions.***

Policy direction that provides pathways through a policy regime that is dominated by protection, enhancement and restoration will result in environmental, social, economic and cultural benefits by assisting with the consenting and re-consenting of renewable electricity generation activities.

***The efficiency and effectiveness of the provisions for achieving the objectives.***

The ability to address environmental effects by way of offsetting and compensation is an efficient and effective way of achieving the objectives of the chapter and the RMA.

***The risk of acting or not acting where there is uncertain or insufficient information about the provisions.***

There is no uncertainty or insufficiency of information. However, the risk of not acting in the manner proposed by Contact is that the policy regime lacks balance and some renewable electricity generation activities may be foreclosed or curtailed.

## Appendix B – Strike-through of Changes Sought by Contact

In accordance with paragraph 8 of Minute 5, the following sets out a strike-through of the changes sought by Contact.

Relief Sought
<p>Amend the introduction to Chapter 2 Strategic Directions to read as follows:</p> <p><b>Chapter 2 Strategic Directions</b></p> <p>The following chapter provides an outline of the key strategic and significant resource management matters for the Taupō <del>D</del>istrict. This chapter includes objectives and policie<del>s</del>y to guide decision making at a strategic level.</p> <p>The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes. They are indicative of the matters which are important to the Taupō District community and reflect the intended outcomes to be achieved through the implementation of the District Plan.</p> <p>The strategic directions will be particularly relevant for any future changes to the Plan and any significant resource consent applications where there is a requirement to consider District Plan policy.</p> <p>This chapter should be read as a whole and applied across the district and all zonings unless the provisions relate to a specific zoning or part of the District.</p> <p>This chapter does not include rules. Relevant rules can instead be found in the chapters under the District Wide and Area Specific headings of the Plan.</p> <p>The key strategic or significant resource management matters <del>for the district</del> for the Taupō District are:</p> <ol style="list-style-type: none"><li>1. Tāngata Whenua</li><li>2. Fresh Water Quality</li><li>3. Urban Form and Development</li><li>4. Climate Change</li><li>5. Strategic Infrastructure</li><li>6. Natural Values and Landscapes</li></ol>
<p>Amend to read as follows:</p> <p>2.1 STRATEGIC DIRECTION 1 TANGATA WHENUA</p> <p>The Council, through the District Plan, is required to take into account the <del>P</del>principles of <del>the</del> te Tiriti o Waitangi. This is to be done at all levels of planning and decision making under the Plan.</p> <p>A comparatively high proportion of the district is Māori freehold or multiple-owned land. There is a strong desire for Māori to return to their ancestral land, with a range of aspirations for changed land use, land development and settlement, whilst exercising kaitiakitanga and protecting sites of cultural significance. The <del>d</del>istrict <del>p</del>lan has an important role to play in supporting mana whenua in achieving these aspirations.</p> <p>The Council is also required to, in partnership with mana whenua, recognise and provide for the <del>m</del>Māori values in resource management and decision making. These include the important relationship of <del>m</del>Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga and to have particular regard to kaitiakitanga.</p> <p>This is to happen not just through recognition and incorporation of these matters into the <del>p</del>lan but also the wider decision making and plan implementation process. These values should not be considered as a separate matter to the wider plan but are expected to be applied throughout all aspects of planning and decision making within the Taupō District.</p>
<p>Amend to read as follows:</p> <p>2.1.2 Objective<del>s</del></p>

## Relief Sought

1. The values, rights and interests of Taupō District mana whenua are recognised and protected.
2. Mana whenua are a partner in District Plan planning and decision making.
3. Resource management planning and decision making reflects tikanga, mana whakahaere, kaitiakitanga, manaakitanga, whakapapa, mautaranga m-Māori and te whanake.
4. Support development on Māori land that meet the needs of those landowners and respects the exercise of kaitiakitanga, self-determination and the relationship of tāngata whenua with their land, water, significant sites and Wāhi tapu.
5. Māori are supported to develop their ancestral lands for their social, economic and cultural wellbeing.
6. The principles of te tiriti o Waitangi are taken into account through District Plan planning and decision making.

Amend to read as follows:

### 2.1.3 Policy ~~iesy~~

1. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu (sacred sites), and other taonga (treasures).
2. Provide for development on Māori land that enables tāngata whenua:
  - a. to act in a way that is consistent with their culture and traditions
  - b. to fulfil cultural, economic and social aspirations of those owners
  - c. enhance their ability to exercise kaitiakitanga
  - d. strengthens their relationships with land, water, significant sites and Wāhi tapu.
3. Recognise the importance of mātauranga Māori, kaitiakitanga and tikanga Māori in land use planning and decision making.
4. Recognise and support opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki.
5. Recognise the wider constraints on the utilisation and development of m-Māori land as different from land in freehold title.
6. Enable development of Māori Land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners.
7. Provide opportunities for Māori involvement in decision-making and monitoring of the District Plan, resource consents, designations and heritage orders including in relation to sites of significance to Māori and issues of cultural significance.
8. Recognise, in decision making, the importance of iwi environmental management plans in providing important guidance and direction on the sustainable use and development of the environment and natural resources.
9. Recognise and support the incorporation of mātauranga Māori principles into the design, development and/or operation of land use activities.

Amend to read as follows:

### 2.2 STRATEGIC DIRECTION 2 FRESHWATER QUALITY/ TE MANA O TE WAI

The health and wellbeing of the lakes and rivers in the district have been degraded both directly and indirectly over recent decades. This degradation includes declining water quality, loss of indigenous biodiversity, loss of access and declining water availability and is the result of activities both on land and in the water bodies themselves. Waterways continue to face increasing demands for use, such as takes for irrigation and drinking water, hydro power generation, and assimilation of discharges from towns, agriculture and other industry; as well as pressures arising from land management practices, land use change and intensification. Holistic and integrated management of land and water resources is critical to reversing declining trends.

The Taupō District Plan has a ~~responsibility role to assist with to the~~ management of the adverse effects on the environment that may arise from subdivision and land use in the District. Managing the adverse effects

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on waterways resulting from subdivision and land use forms part of that responsibility and there are clear benefits from doing this. The state of the Districts freshwater resources is of significant interest to the Taupō District community, and it is important that positive freshwater outcomes are achieved through the ~~application im plem entation~~ of the Plan.

### 2.2.2 Objective

1. 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.

### 2.2.3 Policy

1. Recognise the importance of waterbodies to tāngata whenua and the wider community.
2. Decisions, policy and planning reflect an integrated land management or ki uta ki tai approach to resource management/landuse 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 fresh water 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 and all other waterways.
6. The relationship of tāngata whenua as kaitiaki with waterbodies is respected, enhanced and supported.

## 2.3 STRATEGIC DIRECTION 3 URBAN FORM AND DEVELOPMENT

The Taupō ~~District District's~~ diverse and growing population has led to increased demand for housing and demand for new commercial and industrial areas. Urban development also generates further demand for infrastructure services, particularly development infrastructure such as three waters and transportation services. The District Plan provides a framework for ensuring that urban development, subdivision and changes in land use occurs in a planned and efficient manner and is adequately serviced by infrastructure (including development ~~and of~~ additional infrastructure).

The strategic directions for urban development establish the approach for urban form and development within the Plan as identified through the 2018 District wide growth management strategy, Taupō District 2050. This approach reflects ~~the~~ an efficient and effective urban form which will develop in a manner that is appropriately serviced by infrastructure reflects the important values and communities within the District.

As well as green field development, the plan provides important guidance about the protection of existing urban areas, including Town Centres, to enable them to continue to function effectively in a manner that best serves the wider District.

### 2.3.2 Objectives

1. The district develops in a cohesive, compact and structured way that:
  - a. contributes to well-functioning and compact urban forms that provide for connected liveable communities;
  - b. enables greater social and cultural vitality and wellbeing, including through recognising the relationship of tāngata whenua with their culture, traditions, and taonga;
  - c. ensures infrastructure is efficiently and effectively integrated with land use; and
  - d. meets the community's short, medium and long-term housing and business needs.
2. Subdivision, use and development of land will be consistent with TD2050 2018 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of cost effective infrastructure.

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3. Subdivision, use and development of land in appropriate locations which will have demonstrable social and cultural benefits to the District's community will be supported.
4. Development is serviced by an appropriate level of infrastructure that effectively meets the needs of that development.
5. The Town Centre Environment is strengthened and reinforced as the primary commercial, retail, recreational, cultural and entertainment centre s for Taupō District.
6. Subdivision, use and development will not detract from the planned urban built form and effective functioning of the environment which it is located.
7. Subdivision is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner that protects or enhances the important natural values of the environment where it is located.
8. The East Taupō Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.

Amend to read as follows:

### 2.3.3 Policies

1. Identify and zone appropriate areas of land for urban purposes to guide the future provision of infrastructure within the Taupō District.
2. Planning and development in urban environments will positively contribute to well-functioning urban environments.
3. Subdivision, use and development of land will be consistent with TD2050 to maximise the efficient use of zoned and serviced urban land and is co-ordinated with the provision of effective infrastructure.
4. Avoid fragmented development that results in inefficiencies in the provision of infrastructure and land use.
5. Require urban subdivision and land development to be efficiently and effectively serviced by infrastructure (including development and of additional infrastructure), according to the capacity limitations of that infrastructure.
6. Provide for subdivision, use and development of land that will lead to demonstrable beneficial social and cultural outcomes for the District's community.
7. Provide for the development of Papakāinga on m-Māori land to facilitate m-Māori occupation on their ancestral lands.
8. Maintain strong boundaries to the town centre to consolidate and intensify retail, commercial and office activities within the city centre and protect the planned urban built form of residential neighbourhoods.
9. Restrict the location and development of retail and commercial activities within non-commercial areas of the district to ensure that the town centre continues to be the district district's pre-eminent retail, commercial and mixed-use centres.
10. Manage subdivision use and development of land to ensure that it will not:
  - a. have an adverse effect on the functioning of the environment where it is located,
  - b. unduly conflict with existing activities on adjoining properties and the surrounding areas,
  - c. compromise development consistent with the intent and planned urban built form of the environment where it is located
  - d. give rise to reverse sensitivity effects from existing uses
11. Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of risk to life, property and the environment.
12. Do not support subdivision and development which will inappropriately affect heritage sites or areas of important natural and landscape values.

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13. Ensure that new urban subdivision and land development is designed in a manner that enables effective and logical multi modal transportation links to the surrounding, including planned, urban areas.

### 2.4 STRATEGIC DIRECTION 4 CLIMATE CHANGE

Climate change has been identified as an issue which is important globally and within the Taupō District. A warming environment, longer and drier droughts and increased intensity of storm events are anticipated. It is important that the District and its communities ~~are able to~~ adapt to the effects of climate change to be resilient and safe.

For environmental management and planning purposes there are two separate, but important aspects of climate change:

1. Effects on climate change – which refers to activities that may lead to an increase in greenhouse gases and those which may result in a reduction of greenhouse gases ~~from discharged to~~ the atmosphere or help to facilitate efforts towards decarbonisation, including the electrification of home heating, transport and industry.

2. Effects of climate change – which are the effects caused by climate change such as more frequent flooding, droughts or intensive weather events which can endanger communities, assets and infrastructure.

It is important to consider both of these aspects of climate change to effectively enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety. Supporting positive climate change outcomes and ensuring that the effects of climate change are recognised and provided for will assist in planning for a district which helps avoid, does not contribute to, and is resilient to, climate change. The Strategic Directions for climate change are consistent with the Government's obligations to achieve net zero carbon emissions by 2050, and accords with the target for 100% renewable electricity generation by 2030.

#### 2.4.2 Objectives

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

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

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

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

#### 2.4.3 Policies

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

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

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

- adaptation required to mitigate risks from climate change
- provides for increased electricity output, or greater efficiency
- continued safe, efficient and secure operation.

~~4.~~ Land use activities which will ~~unduly~~ accelerate the effects of climate change will be discouraged.

~~5.~~ 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.

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

### 2.5 STRATEGIC DIRECTION 5 SIGNIFICANT AND LOCAL INFRASTRUCTURE

Infrastructure, as defined in the Resource Management Act generally encompasses physical services and facilities which enable society to function, such as the three waters network, transport, communications, ~~energy- electricity~~ generation, transmission and distribution networks, and any other network utilities undertaken by network utility operators.

Infrastructure is critical to the social and economic wellbeing of people and communities, including providing for their health and safety, and has national, regional and local benefits. However, inappropriately located or designed land use activities can adversely affect the safe and effective functioning of significant and locally important infrastructure ~~and the natural resources on which they rely on to operate.~~

The Taupō District plays an important role in the location and provision of nationally significant infrastructure'. Its central location and natural resources means that Taupō is home to:

- State highways (1, 5, 32, 41 and 47).
- the national grid electricity transmission network
- renewable electricity generation facilities ~~that connect with the national grid~~, accounting for up to 20% of New Zealand's total electricity demand
- Airports used for regular air transport services by aeroplanes

The Taupō District is also home to Regionally Significant Infrastructure including municipal waste water systems, the telecommunications and electricity networks.

In addition to nationally and regionally significant infrastructure, local roads and other infrastructure (including development and additional infrastructure) is vital for the ongoing functioning of the ~~District District's~~ urban and rural communities.

Retain the following Objectives:

#### 2.5.2 Objectives

1. The wider benefits and strategic importance of nationally and regionally significant infrastructure to the District and wider, including the economic, cultural and social wellbeing of people and communities and for their health and safety, are recognised ~~and protected~~ in decision making and land use planning.
2. The local and national benefits of the sustainable development, operation, maintenance and upgrading of electricity transmission and renewable electricity generation resources and activities are recognised and ~~encouraged provided for~~.
3. Land use in the District will not adversely affect the capacity and the safe and effective functioning of nationally and regionally significant and local infrastructure required to service existing and future communities.
4. Local and national transport infrastructure located in the Taupō District operates in a safe and effective manner.

Amend to read as follows:

#### 2.5.3 Policy

1. Recognise and provide for the national, regional and local benefits of renewable ~~energy-electricity~~ generation activities and resources, and transmission activities, in relation to climate change, security of supply, and social, and economic wellbeing of people and communities and for their health and safety.
2. Recognise ~~and provide for~~ the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.
3. Subdivision, land use and development will not adversely affect (including reverse sensitivity effects) the effective and safe functioning of infrastructure.
4. Planning and development of infrastructure will consider the needs and the wellbeing of current and future communities.

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5. Recognise that infrastructure can have important environmental, economic, cultural and social effects.

Amend to read as follows:

### 2.6 STRATEGIC DIRECTION 6 NATURAL ENVIRONMENT VALUES

The Taupō ~~d~~District is characterised by important landscapes and natural areas. These areas are a strong part of the identity to the district and are valued by the local communities and also hold importance nationally. As well as being an important part of the ~~District~~ District's identity, these areas also have a range of important social, cultural and environmental (including intrinsic) values.

The effects of human activities such as built development, vegetation clearance and land development ~~ete~~ can significantly alter the character of the environment resulting in the loss of these areas and their values. While parts of the District have been significantly modified by human activity, vast areas of the natural landscape remain.

These areas are on a range of public (reserve, forest and national parks) and private ~~tenure~~ land. There is also a high proportion of these areas on ~~m~~Māori land throughout the District which can impact the ability of ~~m~~Māori landowners in undertaking development on their ancestral lands.

#### 2.6.2 Objectives

1. Recognise the importance of the ~~District~~ District's natural values and landscapes and their significance to the Taupō ~~District~~ District's communities and identity.
2. The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of inappropriate development.
3. Activities which will lead to the enhancement of indigenous biodiversity values will be recognised and provided for.
4. Recognition of the extent of indigenous vegetation and habitat ~~under on~~ Māori land ~~tenure~~, and the need to provide for the important relationship of Māori and their culture and traditions with their ancestral lands and waahi tapu.
5. The protection of outstanding landscape areas from inappropriate land use and development which may adversely affect their landscape attributes.
6. Recognition of the relationship of tāngata whenua with the natural values of their ancestral lands, waterbodies, sites, cultural landscapes, and other natural taonga of significance.
7. The natural character of riparian margins are preserved, and enhanced where appropriate, and protected from inappropriate subdivision, use and development.

Amend to read as follows:

#### 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.
3. Recognise and provide for tāngata whenua in their role as kaitiaki of the natural values on their lands and the wider district.
4. Activities must recognise and maintain the attributes of identified outstanding natural features and landscapes and not have any more than minor adverse effects on them.
5. Encourage the protection, enhancement and restoration of natural landscape value areas, including by supporting opportunities for tāngata whenua to exercise their customary responsibilities as mana whenua and kaitiaki in restoring, protecting and enhancing these areas.
6. Recognise the contribution made by landowners to the protection and enhancement of areas of natural values and landscapes.



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