



GREAT LAKE TAUPŌ
Taupō District Council

Section 32 Evaluation Report
TAUPŌ TOWN CENTRE ENVIRONMENT
Plan Change 40

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1 INTRODUCTION

Proposed Plan Change 40 Town Centre Environment is in three parts, inserting amendments to the Operative Taupō District Plan for the following:

- Providing for increased **building height limits** as associated with Height Limit Overlays for that part of the Taupō Town Centre Pedestrian Precinct associated with the block between Roberts Street, Tongariro Street, Te Heuheu Street and fronting Ruapehu Street.
- Explicitly identifying requirements for **verandas** are not applicable for the many Service Lanes that provide back of house access to commercial premises within the Town Centre.
- Providing for an increased number of **temporary activities** (and associated non-operational days) able to be undertaken within Tongariro Domain (as zoned Taupō Town Centre Environment).

In terms of **building height limits**, the change is to provide greater opportunities for redevelopment and to facilitate a compact town centre within a confined part of the Pedestrian Precinct, as well as acknowledge recent demand (and resource consents) seeking higher buildings in this part of the Taupō Town Centre. The provisions are associated with targeted urban design requirements to ensure that the resultant built form is appropriate in terms of the town centre wider context and materiality.

For **verandas**, the change is to ensure clarity that it is pedestrian frontages and the pedestrian laneway system that are the subject of the veranda requirements, and not those frontages to services lanes.

Lastly, in terms of **Temporary Activities**, Taupō provides a wealth of functions and events that bring people to the district, including the annual IRONMAN New Zealand, Lake Taupō Cycle Challenge, Great Lake Relay and Across the Lake Swim. Hosting these events provides substantial economic and social benefits to Taupō and the district. The supporting facilities and infrastructure (such as marquees, toilet blocks, and temporary public access restrictions within the Tongariro Domain) are considered temporary activities necessary to host such events. The District Plan requires fine tuning to ensure that there is a balance in terms of enabling a reasonable frequency of these events (and their economic benefits) and any associated disruption to the community.

This Section 32 report should be read in conjunction with the plan change document.

2 STATUTORY FRAMEWORK

The preparation of PC40 has been undertaken in accordance with the First Schedule of the Resource Management Act 1991 (RMA).

A summary of the respective statutory requirements in terms of District Plan drafting, referencing *Colonial Vineyards vs Marlborough District Council [204] NZEnvC 55 [17]* is set out below:

- (a) *Provisions in the District Plan are to assist the Taupō District Council in undertaking its functions under the Act*¹. Including the function of seeking to achieve the integrated management of the use, development and protection of land and associated natural and physical resources of the (Taupō) District².

An important physical resource in the district is the Taupō Town Centre. That resource is represented by the agglomeration of private and public investment including buildings, open spaces and services that support services and activities which subsequently promote social and economic wellbeing for the District.

These physical resources require consideration in terms of the integrated management of the use, development, and protection of the natural and physical resources of Taupō District.

That function is to be fulfilled by *objectives, policies and methods within the District Plan, controlling any actual or potential effects of the use, development and protection of land*³.

- (b) *The preparation of the District Plan is to be undertaken in accordance with the provisions of Part 2, and any applicable regulations.*
- (c) National Policy Statements are the RMA legislative tool whereby central government can prescribe objectives and policies to address matters of national significance. *The Council must prepare and change its plan in accordance with a NPS (s74(1)) and must give effect to any relevant NPS (s75(3)(a)).* The only relevant NPS to this this Plan Change is the National Policy Statement on Urban Development (**NPS-UD**).
- (d) *Effect is to be given* to the provisions of the Waikato Regional Policy Statement⁴.
- (e) *Regard shall be had* to any relevant management plan and strategy prepared under other Acts⁵.
- (d) The approach needs to align with the Council's functions under the Act and other relevant instruments.
- i. *That processes (and provisions that drive processes) are timely, efficient and cost effective and proportionate to the functions being performed, and that plan drafting is clear and concise* (Section 18A); and
 - ii. When reaching a conclusion as to which provision is the '*most appropriate*' the requirements of s32, having regard to the *efficiency* and *effectiveness* of the provision is to be considered.

In this context, an evaluation of an objective to be amended or inserted is to be examined in light of whether such is the most appropriate way to achieve the purpose

¹ Section 74(1)(a) and s31

² Section 31(1)(a)

³ Section 31(c)

⁴ Section 75(3)(c)

⁵ Section 74(2)(b)(i)

of the Act⁶.

For an evaluation of provisions (policies and rules) the examination is to consider whether such are the most appropriate to achieve the objectives⁷, considering reasonably practicable alternatives⁸, and the efficiency and effectiveness of the provisions in achieving the objectives⁹.

Sections 74 of the RMA sets out the requirements for changes to district plans, while section 75(3) and section 75(4) sets out the following matters:

- (3) *A district plan must give effect to—*
- (a) *any national policy statement; and*
 - (b) *any New Zealand coastal policy statement; and*
 - (ba) *a national planning standard; and*
 - (c) *any regional policy statement.*
- (4) *A district plan must not be inconsistent with—*
- (a) *a water conservation order; or*
 - (b) *a regional plan for any matter specified in section 30(1).*

These requirements are addressed in the following sections of this report.

Section 74(1) directs that Council must undertake changes to its district plan in accordance with s31, provisions under Part 2 and s32.

PC40 is in accordance with the Council's functions under s31 as relevant to the matters being amended, and the requirements of s32(b)¹⁰.

Building Height: The amendments to plan provisions (Town Centre Environment Pedestrian Precinct – Height Overlay) provide a targeted approach to increasing the scale and capacity of commercial buildings to promote redevelopment and investment in a very visible part of the commercial core fronting Lake Terrace.

The approach will enable increased capacity for a wider range of commercial (including residential accommodation and office) activities, assisting in a consolidated Taupō Town Centre Environment and increased vibrancy.

Verandas: The amendments provide increased certainty as to the requirements associated with verandas within the Town Centre Environment – Pedestrian Precinct and Retail Expansion Precinct, increasing efficiency and effectiveness of the Plan as to confirming a targeted approach to veranda requirements, including reducing compliance costs.

Temporary Activities: Amendments increase the number of temporary activities (events and functions) able to be undertaken within the Tongariro Domain over any six-

⁶ Section 32(1)(a)

⁷ Section 32(1)(b)

⁸ Section 32(1)(b)(i)

⁹ Section 32(1)(b)(ii)

¹⁰ Section 31(a) is not engaged as there are no amendments to Objectives in the Operative Plan.

month period. The changes are necessary, recognising both the economic and social wellbeing benefits provided to the district from hosting such events and that the supporting infrastructure is temporary in nature; as balanced against having regard to the adjoining environment and distance to the Residential Environment.

A full evaluation of PC40 has also been undertaken in accordance with Section 32 of the RMA and is appended to this report.

Clauses 1 to 20A of the First Schedule to the RMA sets out the procedures for a plan change, including consultation and notification requirements.

Clauses 3 and 3B set out the relevant procedures for consultation. Clause 3(1) states that during the preparation of a proposed policy statement or plan, the local authority concerned shall consult with the Minister for the Environment, other Ministers of the Crown who may be affected by the plan change, local authorities who may be so affected, and the Tangata whenua of the area who may be so affected, through iwi authorities.

Clause 3(2) sets out that “a local authority may consult anyone else” in preparing a plan change, subject to Clause 3(4) which requires that such consultation must be undertaken in accordance with Section 82 of the Local Government Act 2002 (‘LGA’). Accordingly, Council must consult with the parties identified in clause 3(1) but retains discretion to consult with anyone else. If Council elects to undertake discretionary consultation, it must do so in accordance with the principles in section 82 of the LGA. Clause 3B relates to consultation with iwi authorities.

Details of the consultation undertaken for PC40 are provided in Section 2.3 of this report with the wider consultation and engagement process set out in the Background and Engagement Report which accompanies this suite of Plan Changes to the District Plan. The consultation meets the requirements of the First Schedule.

Clauses 5 to 11 of the First Schedule set out procedures for notification, receipt of submissions, hearings and notification of decisions in relation to plan changes. In processing the plan change, it will be necessary for compliance to be achieved with the requirements of these provisions.

2.1 Relevant Planning Documents

The relevant planning documents are assessed below¹¹.

2.1.1 National Policy Statement – Urban Development

The following analysis relates to the spatially defined increase in height limits in the Town Centre. Amendments relating to certainty as to the provision of verandas and increasing the number of ‘Temporary Activities’ are not relevant to a consideration under the NPS-UD.

The NPS, in broad terms aims to ensure that New Zealand’s towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities, and in the context of the Proposed Plan Change (noting that the purpose of the Plan Change

¹¹ It is noted that there are a number of other important statutory documents associated with the District, such as the *Vision and Strategy - Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010*, however for the sake of conciseness this Plan Change focuses on the immediately relevant statutory framework as applicable to the proposed Changes.

is not focused on providing appreciable commercial development supply to the district), that there is ‘*sufficient development capacity to meet expected demand for ... for business land over the short term, medium term, and long term*¹²’, in a manner that is integrated with infrastructure planning and funding decisions¹³, and provides well-functioning urban environments¹⁴.

Taupō District is a Tier 3 local authority¹⁵ under the NPS-UD, as the NPS-UD does not identify Taupō District as either a Tier 1 or 2 urban environment. Under clause 1.5 ‘Implementation by tier 3 local authorities’ the Taupō District Council is *strongly encouraged to undertake the functions of Tier 1 and 2 local authorities*, however such actions are not mandated.

In terms of application and interpretation the following is also acknowledged:

- (a) The Taupō township is deemed an ‘*urban environment*¹⁶’ for the purpose of the application of the provisions of the NPS-UD.
- (b) Clause 3.38 precludes the Taupō District Council from containing provisions (including rules) that require car parks to be provided for development(s) and land uses(s), with the exception of accessible car parks.

In terms of the outcomes associated with a consideration of the Proposed Plan Change, the provisions in the District Plan (including those that contribute to ‘business sectors¹⁷’ and business land¹⁸) are to contribute to:

- i. Achieving a well-functioning urban environment that enables people and communities to provide for their social, economic and cultural well-being, now and into the future (**Objective 1**).
- ii. District Plan’s enable more... business and community services to be located in, areas of an urban environment: (a) in or near a centre zone; (b) where an area is well serviced by public transport (**Objective 3**).
- iii. New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations (**Objective 4**).
- iv. Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding; and (b) strategic over the long to medium term (**Objective 6**).
- v. Local authorities are to have robust and frequently updated information about their urban environments and use it to inform planning decision (**Objective 7**).
- vi. New Zealand’s urban environments: (a) support reductions in greenhouse gas emissions... (**Objective 8**).

¹² NPS-UD Policy 2

¹³ NPS-UD Objective 6

¹⁴ NPS-UD Objective 1 and Policy 1

¹⁵ NPS-UD Appendix 2, Table 2, Interpretation ‘Tier 3 Local Authority’.

¹⁶ NPS- UD Section 1.4 Interpretation.

urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

(a) is, or is intended to be, predominantly urban in character; and

(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.

¹⁷ NPS-UD Policy 1(b)

¹⁸ NPS-UD Policy 2

Well-functioning urban environments are defined in **Policy 1**. In relation to the Proposed Plan Change, the relevant elements are:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:..

- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) support reductions in greenhouse gas emissions; and...*

Policy 2 requires:

Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

Policy 3 is **not** mandated to Taupō District Council¹⁹ but requires of Tier 1 urban environments:

In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and...*

Policy 6 sets out the matters to be had particular regard to in terms of decisions that affect urban environments.

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) are not, of themselves, an adverse effect*
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*

¹⁹ Apart from the 'encouragement' of Clause 1.5

- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

The implications for a consideration of the Proposed Plan Change (as it relates to Building Height) in relation to the NPS-UD is that the Taupō District Council is to provide 'at least²⁰' at any one-time sufficient business development capacity for different business sectors, in the short (3 years), medium (10 years) and long terms (30 years).

It is understood that sufficient business development capacity exists in the District Plan. However, the Plan Change will facilitate additional capacity and supply of business land²¹ for commercial purposes (including office and traveller's accommodation) to meet community needs. The economic assessment accompanying this Plan Change²² identifies:

The existing GFA across the identified areas is estimated at 32,000sqm with a status quo building envelope (that is the permitted envelope of floorspace provided by the District Plan) of around 71,000sqm of GFA. The proposed height limit changes would increase the total build envelope GFA to around 103,600sqm. A net increase of around 32,700sqm or 46%.

Accordingly, in terms of the NPS-UD requirements the Plan Change would:

- Provide a meaningful, but proportional, contribution to Taupō performing as a well-functioning urban environment (**Objective 1**), and through supporting intensification within the Town Centre (and compact urban environments compared to dispersal) support reductions in greenhouse gas emissions (**Objective 8(a)**).
- Recognise that whilst the increase in height has consequences in terms of built form and character for this part of the Taupō Town Centre, urban environments including their amenity values are to develop and change over time to provide for their community and future generations (**Objective 4**). Targeted urban design controls included in the Proposed Plan Change are to ensure such built form remains compatible with the context and materiality of this important part of the district's urban environment.
- Facilitate additional commercial development supply capacity, contributing to the 'at least sufficient development to meet expected demand' in **Policy 2**.
- That capacity, through increased height provisions for a spatially defined area within a prime part of the Town Centre, enables the realisation of increased intensification in 'city centre zones' (the non-mandatory **Policy 3(a)**), and contributes to well-functioning urban environments (**Policy 1**) through enabling a variety of sites for different business sectors (clause (b)) and the benefits of good accessibility represented by increasing realisable commercial development within the Taupō Town Centre (sub clause (c)).

²⁰ NPS-UD Policy 2.

²¹ NPS-UD. Section 1.4

²² Attachment A. Property Economics Ltd [pg 8]

2.1.2 National Planning Standards

The National Planning Standards (2019) seek to ensure a consistent approach to plan structure format and content.

Section 17 of the Standards sets out the Implementation Standard (or mandatory requirements) for enacting the Standards.

For District Plans, including the Taupō District Plan, the Standard²³ requires:

- (a) For matters of structure and format that there is a mandatory requirement to implement the National Planning Standards under (i) or (ii) below whichever is sooner:
 - (i). Amendments to the district plan made by **five years from when the planning standards come into effect.**
 - (ii). Notification of a proposed district plan (but not a proposed change or variation) for submissions under clause 5, Schedule 1 RMA after the planning standards come into effect.
- (b) For definitions (Section 14. Definitions) any amendments to the District Plan made by **seven years from when the planning standards come into effect.**

For this Proposed Plan Change, the relevant matters that would need to be considered include:

- The District Spatial Layers Standard (Section 12) – In terms of use of notation to identify the spatial extent of veranda requirements and increased height enablement in the Town Centre Environment.
- The Mapping Standard (Section 13) – In terms of mapping the above.
- The Definitions Standard (Section 14) – In terms of inserting the National Planning Standards required definition of ‘height’ and ‘road’, as below:

Height: means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.

Road: has the same meaning as in section 2 of the RMA (as set out in the box below)

*has the same meaning as in section 315 of the Local Government Act 1974; and includes a motorway as defined in section 2(1) of the Government Roading Powers Act 1989 Section 315 of the Local Government Act 1974 road definition:
....*

As the National Planning Standards were made operative in November 2019, for incremental Plan Changes, the Taupō District Council would need to ensure consistency in terms of requirements for structure and form by November 2024, with consistency with Definitions by November 2026.

Accordingly, for the purpose of this Plan Change **there is not a mandatory requirement to amend provisions to accord with the requirements of the National Planning Standard.**

²³ National Planning Standard (Section 17(4) and (7) ‘Territorial Authorities’)

To do so risks unintended consequences within the architecture of the District Plan outside a more fulsome or complete review.

However, it is noted that the definition of both 'height' and 'road' in the National Planning Standard to those used in the operative Taupō District Plan are similar in meaning and precision, and that the use of 'Overlays' to denote spatial notations is also similar to that purpose as expressed in the Standards.

2.1.3 Regional Policy Statement

Pursuant to section 75(3)(c) of the RMA, a District Plan must give effect to any operative Regional Policy Statement (**WRPS**). The Regional Policy Statement of relevance to the Taupō Town Centre is the Waikato Regional Policy Statement.

The WRPS was amended in March 2022 to account for the requirements of the NPS-UD. The amendment introduced Objective 3.27 as this related to requirements for housing bottom lines. That amendment does not extend to the Taupō District.

The Waikato Regional Policy Statement was made operative in April 2016.

Waikato Regional Policy Statement

The relevant provisions of the Waikato Regional Policy Statement include:

Objective 3.1: Integrated Management	<i>Natural and physical resources are managed in a way that recognises:</i> <ul style="list-style-type: none">d) <i>the needs of current and future generations;</i>e) <i>the relationships between environmental, social, economic and cultural wellbeing;</i>
Objective 3.10 Sustainable and efficient use of resources	<i>Use and development of natural and physical resources, excluding minerals, occurs in a way and at a rate that is sustainable, and where the use and development of all natural and physical resources is efficient and minimises the generation of waste</i>
Objective 3.12 Built Environment	<i>Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:</i> <ul style="list-style-type: none">g) <i>minimising land use conflicts, including minimising potential for reverse sensitivity; ...</i>k) <i>providing for a range of commercial development to support the social and economic wellbeing of the region.</i>
Objective 3.21 Amenity	<i>The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced.</i>
Policy 6.1 Planned and coordinated subdivision, use and development.	<i>Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:</i> <ul style="list-style-type: none">a) <i>has regard to the principles in section 6A;</i>b) <i>recognises and addresses potential cumulative effects of subdivision, use and development;</i>c) <i>is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and</i>d) <i>has regard to the existing built environment.</i>
Policy 6.3 Co-ordinating growth and infrastructure	<i>Management of the built environment ensures:</i> <ul style="list-style-type: none">a) <i>the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and</i>

operation of transport and other infrastructure....

**Policy 6.11
Implementing
Taupō District 2050**

Growth in the Taupō District will be managed in a way that:

- a) recognises that Taupō District 2050 provides for the management of future growth, including by: ...*
- c) acknowledges that changes to the Taupō District Plan intended to implement Taupō District 2050 must be considered on their merits under the RMA.*

**6A Development
Principles (for the
purpose of Policy
6.1)**

General Development Principles

New development should:

- a) support existing urban areas in preference to creating new ones;*
- c) make use of opportunities for urban intensification and redevelopment to minimise the need for urban development in greenfield areas;*
- e) connect well with existing and planned development and infrastructure;*
- i) promote compact urban form, design and location to:*
 - i) minimise energy and carbon use;*
 - ii) minimise the need for private motor vehicle use;*
 - iii) maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;*
 - iv) encourage walking, cycling and multi-modal transport connections; and*
 - v) maximise opportunities for people to live, work and play within their local area;*
- o) not result in incompatible adjacent land uses (including those that may result in reverse sensitivity effects), such as industry, rural activities and existing or planned infrastructure;*

Certainty in excluding veranda requirements for Service Lanes

Amendments associated with increased certainty for **veranda provisions** in the Taupō Town Centre environment engage with **Objective 3.10** and **Objective 3.21**. In seeking to ensure that building redevelopment in the Town Centre is undertaken *efficiently* in terms of **Objective 3.10** the amenity of service lanes is not assisted through requirements for weather protection in terms of contributions to overall Town Centre amenity (**Objective 3.21**), and in many instances the requirement for such could facilitate conflicts between pedestrians and back of house servicing activities that predominantly utilise these service lanes.

Increase in the frequency of Temporary Activities in Tongariro Domain

Amendments associated with the increase in **temporary activities** to be facilitated at Tongariro Domain engage with **Objective 3.1** in terms of managing the use of that resource in a manner that contributes with recognising the needs of current and future generations, and the economic and social wellbeing benefits accrued to the district through hosting such events.

However, there are limits imposed in terms of the number of days (operation and non-operational) to ensure a balanced approach is undertaken recognising the need to manage amenity expectations, recognizing that such events can be disruptive but are of limited duration and involve temporary structures, facilities and activities – taking into account the proximate (but not adjacent) Residential Environments (**Objective 3.21**).

Increased Height Limits for a defined area of Taupō Town Centre Environment

The Proposed Plan Change increase in height limits for a spatially defined (Overlay) area for the Taupō Town Centre – Pedestrian Precinct engages with a number of the Regional Policy Statement Provisions:

- **Objective 3.1** in terms of integrated management, providing for the needs of future generations (in terms of economic wellbeing and employment).
- **Objective 3.10** in terms of increasing the productive use of the resources represented by this part of the urban environment, and enhancing the efficient use and development of these resources through promoting redevelopment and more intensive land forms.
- **Objective 3.12(g)** in ensuring reverse sensitivity conflicts are mitigated, the Plan already requires that ‘residential and accommodation activity’ is to ensure that habitable spaces does not exceed an interior noise level of 40dBA L_{eq} as confirmed by acoustic engineer²⁴; and **Objective 3.12(k)** in that enablement of feasible development within the Overlay facilitates further opportunities for redevelopment and intensification of the built form to provide for commercial development, in turn supporting the social and economic wellbeing of the region.
- **Objective 3.21** in introducing targeted urban design assessment matters for built form in the Height Overlays taking advantage of increased heights above the operative District Plan three (3) story limits to ensure active engagement with the surrounding context (**Policy 6.1(d)**) including the important landmarks of Lake Taupō and Tongariro Domain, and materiality of the built form.
- **Policy 6.3** in that the increased feasible development is located within the Town Centre which is efficiently and effectively integrated with infrastructure (services) and transport infrastructure and promotes compact urban form and design (**6A Development Principles (e) and (j)**).
- Lastly, in terms of **Policy 6.11** in implementing Taupō District 2050 through providing opportunities for consolidating retail and office activities within the Taupō Town Centre (compared to dispersal), and encouraging more activity and vitality²⁵,

²⁴ Taupo District Plan 4g.1.2

²⁵ TD2050 (2018) Section 3.4

as well as supporting existing urban areas and making use of opportunities for urban intensification and redevelopment (**6A Development Principles (a) and (c)**).

The Proposed Plan Change therefore gives effect to the relevant provisions of the WRPS.

2.1.4 Iwi Management Plans

Pursuant to s74(2A) of the Resource Management Act 1991, a change to the District Plan must *take into account* any relevant planning document recognised by an iwi authority and lodged with the territorial authority, *to the extent that its content has a bearing on the resource management issues* of the district. Take into account means that the matter must be addressed with weight and as a matter of judgement based on the facts and merits of the issue.

At the outset, it is not considered that this narrowly defined Plan Change which relates to focused aspects of built form and usage of the Taupō Town Centre impinges on specific principles within the Iwi Management Plan identified below. Rightly though, that is for iwi to ultimately conclude.

I have considered the relevant *Ngati Tūwharetoa Iwi Management Plan* for the area, and broad matters raised which have bearing on the use of the built form.

Ngati Tūwharetoa Iwi Management Plan (2003)

Exercising kaitiakitanga / Partnership²⁶: In terms of key principles, the Management Plan seeks to ensure active participation as a partner in the resource management decision-making processes.

Consultation with iwi is outlined below, and it is understood that Panel members to hear and consider this Plan Change and submissions received will include Panel members nominated by *Tūwharetoa Māori Trust Board*.

Papatuānuku - Land²⁷: Advocate for the protection of the mauri of land, including involvement from tangata whenua with regard to the management of reserves, recreation areas.

The Proposed plan change will not result in any changes to the management of water quality or discharges, air discharge, use of fisheries, water quality or the management of the geothermal resource.

Subject to inclusivity through consultation and representation and partnership in terms of decision making (through Panel membership), the Plan Change is considered to take into account the matters contained in the iwi management plans in accordance with section 74(2A) of the RMA.

2.1.5 Relevant Management Plans and Strategies

²⁶ *Ngati Tūwharetoa Iwi Management Plan [pages 11 and 18]*

²⁷ *Ngati Tūwharetoa Iwi Management Plan [page 24]*

Regard is to be had to the **TD2050 - Growth Management Strategy (2018) and the Taupō Long Term Plan.**

In the context, 'have regard to' means, giving matters genuine attention and thought, and such weight as is considered to be appropriate. In *Mapara Valley Preservation Society Inc v Taupō District Council* (A083/07), the Environment Court noted that the Taupō District Council Growth Strategy (TD2050) strategy was not a statutory document, it:

*"was publicly notified for consultation with the 2006 – 2016 Long Term Council Community Plan using the special consultative procedures under the Local Government Act 2002. We thus find that the Variations should be given **substantial respect and weight** [when making decisions on a resource consent]".[49]*

and

"Plan Changes 19, 21, 23, 24 and Variation 25 are based on and informed by a comprehensive Growth Management Strategy, the Taupō District 2050 District Growth Management Strategy, a document which has been the result of an extensive period of research, consultation and a participatory process under the Local Government Act". [58]

2.1.5.1 TD2050 - Growth Management Strategy

In terms of commercial areas, the direction in the Strategy is to encourage intensification²⁸, creating a market incentive for building redevelopment and making best use of the infrastructure and investments the community has made²⁹, in contrast to expanding the Taupō Town Centre.

The Strategy also outlines key visions that include:

Charming: *Our district's reputation will be built on the attractiveness of our towns, the diversity of the experiences we offer, and the friendliness of our people.*

Vibrant: *The vibrancy of our district will be created by well connected communities who work together to create a positive, fun environment people want to call home.*

Associated strategic directions seek to design and plan for compact, walkable and adaptable urban areas, and create vibrant and diverse places where people love to live, work, play and invest.

Actions include: maintaining provisions in the District Plan which strengthen the Town Centre Environment's role as the primary business, retail, recreational and entertainment hubs; and buildings are designed to reflect best practice such as the Urban Design Protocol³⁰.

²⁸ TD2050 (2018) [pg 3]

²⁹ TD2050 (2018) [pg 13]

³⁰ TD2050 [Actions 12 and 13].

2.1.5.2 Long Term Plan (LTP) 2021 - 2031

The strategic goals of the LTP³¹ are:

- *Growing resilient economies*
- *Enhancing healthy and sustainable environments, and;*
- *Enabling connected and safe communities.*

Specific identified funding includes 'in-house' functions to support event organisers to run both commercial and community events.

2.1.5.3 Summary

The Proposed Plan Change, in terms of enabling a spatially defined area for increased building height in the Town Centre assists in implementing those aspects of the TD2050 that seek to create conditions for increased intensification and investment in the Town Centre.

Providing more enabling provisions as to hosting events with Tongariro Domain is consistent with the LTP's approach to supporting events in the district.

2.1.6 Regional Plans

In accordance with Section 75(4)(b) of the RMA, an operative plan change must not be inconsistent with a regional plan for any matter under section 31. PC40 is not inconsistent with any regional plan, taking into account that this plan change is limited to changes in percentage of commercial building height, temporary activities and increased plan certainty as to veranda cover in the Town Centre Environment.

³¹ LTP [page 5]

2.2 Taupō District Operative Plan Approach

Increased Height Limits for a defined area of Taupō Town Centre Environment

The Taupō Town Centre is split into three precincts: the Pedestrian Precinct (as managed as the most vibrant part of the Town Centre, is to encourage pedestrian flows and with provisions seeking a higher level of amenity); the Retail Expansion Precinct which provides opportunities for further intensification to the east of the Pedestrian Precinct; and the Commercial Fringe Precinct which provides for opportunities for larger sites to accommodate less pedestrian orientated retail activities (such as large format retail and trade suppliers).

For all the Precincts, the operative Plan Height limits (without requiring resource consent) is set at three (3) floors above ground. This is despite the Pedestrian Precinct representing the 'prime' Town Centre area where increased intensification and a wider range of activities should be anticipated by the Plan.

The relevant operative Objective and Policy is:

OBJECTIVE

3s.2.2 *Maintain and enhance the character and amenity of the Taupō Town Centre Environment.*

POLICY

3s.2.2(i) *Encourage redevelopment of existing properties in a way that consolidates and diversifies the range of activities while maintaining an appropriate scale of development consistent with the character of the Taupō town centre.*

3s.2.2(ii) *Maintain and enhance the character and amenity of the Taupō Town Centre Environment by controlling the bulk, location and nature of activities through:*

a. the provision of maximum allowable heights for given locations or precincts to enable the maximum development of usable floor area to provide a sense of enclosure to the streetscape.

The Performance Standard is:

4g.1.9 *Maximum Building Height* *Total height of three (3) floors above ground level.*

The definition of Height is:

'the vertical distance between the ground level at any point and the highest part of the building at that point, excludes any structure attached to the building that which does not exceed 0.6m in any horizontal dimension, and does not exceed the permitted height by more than 1.5m'.

Certainty in excluding veranda requirements for Service Lanes

The relevant operative Policy is:

3s.2.2(iii) *Enhance the special characteristics of the Pedestrian Precinct of the Town Centre Environment including the continuation of interesting, hospitable and safe pedestrian environments through the retention of verandahs, display window frontage and vehicle access to sites.*

3s.2.2(iv) *Enhance the provision of pedestrian shelter in the Retail Expansion Precinct.*

The Performance Standards are:

4g.1.11 [Pedestrian Precinct] - Verandahs *All buildings must provide a veranda that extends the full length of the site frontage along any road or identified laneway...*

4g.1.15 [Retail Expansion Precinct] - Verandahs *All buildings must provide a veranda that extends the full length of the site frontage along any road ...*

The definition of Road is:

the same meaning as in the Local Government Act 1974. Land shown as road on the planning maps will be managed in accordance with the provisions of the adjoining environment. Where the road has two adjoining Environments the provisions shall extend to the centre line of the road.

Increase in the frequency of Temporary Activities in Tongariro Domain

The relevant operative Objective and Policy is:

OBJECTIVE

3s.2.1 *The Taupō Town Centre Environment will continue to reinforce and strengthen its role and function as the primary commercial, retail, recreational, cultural and entertainment centre for Taupō District.*

POLICY

3s.2.1(iii) *To recognise the important role of the Tongariro Domain and its existing infrastructure and services (including those provided by commercial operators) in providing recreation and commercial opportunities that support the wider town centre environment.*

The Land Use Rules are:

4g.2.2 *Any temporary activity, being an activity of up to a total of three operational days in any one calendar year, which exceeds any performance standard(s), is a **permitted activity**, provided that:*

- i There are no new permanent structures constructed; and*
- ii Once the activity has ceased, the site (including vegetation and the surface of the ground of the site) is retained or re-instated to its condition prior to the activity commencing; and*
- iii An allowance of five non-operational days associated with the activity is not exceeded, during which time any breach of any performance standard(s) shall only be to the extent reasonably necessary to undertake any relevant aspect of the activity.*

4g.2.6 *Any activity that is not a permitted, controlled activity or restricted discretionary activity, is a **discretionary activity***

2.3 Taupō District Proposed Plan Approach – Strategic Directions

The package of Proposed Plan Changes being notified includes Strategic Directions. These provisions have no statutory weight until they are notified. They will also be subject to submissions and necessary amendments subject to the merits of evidence and decisions.

Regardless in terms of sections 32(1)(b) and 75(1)(b) and (c), there will be a need to ensure that the provisions introduced through Plan Change 40 achieve and implement relevant Strategic Directions provisions, and therefore achieve vertical alignment between provisions.

As identified in the 'Introduction' to Strategic Directions:

The following chapter provides an outline of the key strategic and significant resource management matters for the Taupō district. This chapter include objectives and policies to guide decision making at a strategic level.

The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes. They are indicative of the matters which are important to the Taupō District community and reflect the intended outcomes to be achieved through the implementation of the District Plan.

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

The relevant Strategic Directions are contained within Section 2.3 – Strategic Direction 3 'Urban Form and Development'. These provisions are:

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. .
3. *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.*

....
5. *The importance of the Town Centre Environment as the primary commercial, retail, recreational, cultural and entertainment centres for Taupō District are recognised in landuse planning and decision making.*

3.3.3 Policy

...

2. *Planning and development in urban environments will positively contribute to well-functioning urban environments.*

4. *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.*

....

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

...

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 form of residential neighbourhoods.*

2.4 Technical Context

2.4.1 Increased Height Limits for a defined area of Taupō Town Centre Environment

The following technical work was commissioned in addition to staff analysis:

- Taupō Town Centre Height Cost Benefit Economic Analysis (Property Economics Limited, 2022): **Attachment A**.
- Taupō Shade Analysis (DCM Urban, 2022). **Attachment B**.

Staff also undertook the following analysis:

- Resource Consent analysis of infringements of the building height rule, including:
 - RM210454 – 29 Tongariro Street
 - RM210265 – 48 Lake Terrace
 - NZEnvC 090 Cypress Capital Limited vs Taupō District Council (Consent Order pursuant to s279 of the RMA1991)
- Consideration of TDC building height rules in the Commercial Zone against other district plans representative of similar scale Town Centres.

2.4.1.1 Taupō Town Centre Height Cost Benefit Economic Analysis (PEL, 2022) – Attachment A

Property Economics Limited have assessed the economic and employment potential associated with the Proposed Plan Change, and have concluded that:

- There are a limited number of properties (within that area subject to the Proposed Plan Change) that are currently utilising the full extent of their development potential as provided by the Operative Plan provisions³², with most buildings being at grade.
- The types of activities anticipated as a consequence of the Proposed Plan Change would be a continuation of the existing activities at grade (that is retail, food and beverage and commercial services), with above grade facilitating a range of residential apartments, professional offices, and commercial enterprises – such as short stay accommodation³³.
- The extent of floorspace (capacity) that would be enabled by the Proposed Plan Change would be an additional 32,700m², being an increase from an Operative Plan building envelope of some 71,000m² to 103,600m² ³⁴.
- There has been a declining commercial service (includes professional offices) count within the prime area of Taupō's Town Centre since 2000 (when data recording commenced). Given that this area is one of the highest amenity locations for modern offices in the District, the Proposed Plan Change would enable greater realisation

³² Attachment A, PEL 2022 [page 7]

³³ Attachment A, PEL 2022 [page 8]

³⁴ Attachment A, PEL 2022 [page 8]

and increased employment density (both retail and commercial services) in this area, increasing economic productivity of this prime town centre land³⁵.

- Other relative **benefits** (as proportional to that area where increased heights are proposed) include:
 - Catalysing development and redevelopment of sites, as returns on investment are higher.
 - Consolidation of higher density development, including residential development where floor levels above grade provides for apartment living.
 - Increases employment opportunities through increasing both density of development and GFA.
 - A stronger sense of connectedness and vitality, through increased residential and commercial density.
 - Greater flexibility for land users and tenants through the provision of additional floor levels.
 - More efficient infrastructure and land use, as the infrastructure to service increased building intensity and GFA is already established (roads, water, wastewater and footpaths).
 - Adds profile as a commercial hub, as uptake and higher profile buildings will provide prominence and legibility to this part of the Taupō Town Centre.
- **Costs** are associated with:
 - the character may change for this part of the Taupō Town Centre with the potential displacement of standalone retail / food and beverage with malls, arcades, offices and apartments. However, this is driven by landowners themselves (market choice) and is already in the process of happening as the Taupō Town Centre matures through continued reinvestment.
 - Disruption of views from certain points, although this is counterbalanced through the provision of new views attributed to enabled development under the Proposed Plan Change.
 - Potential for inappropriate building development. However, in the Proposed Plan Change this cost is reduced / removed through discrete urban design principles to ensure that development is contextually appropriate in the Taupō Town Centre.

³⁵ Attachment A, PEL 2022 [page 9]

2.4.1.2 Taupō Shade Analysis (DCM Urban, 2022) – Attachment B

DC Urban Limited have assessed the consequences in terms of the potential for increased shading that would be enabled by the Proposed Plan Change.

It is important to acknowledge that shading provided by enabled development will not be uniform across the spatial extent of that area subject to the Plan Change. Whilst the Proposed Plan Change will *enable* development in 'block form' as set out in **Figure 1**, the consequences of redevelopment will be specific to every individual site and subject to contextual urban design requirements (and also developed over the long term) providing for a built form more likely as represented in **Figure 2**. The shading analysis is predicated on worst case (**Figure 1**), and identifies that:

- Using the example of shading increases on the southern extent of Robert Street (and also Tūwharetoa Street) which will increase from three storeys to 12m, the experienced reduction in sunlight received will be 8% between the Proposed Plan Change and the Operative Plan.
- Using the example of the western side of Ruapehu Street where there is a combination of 18m and 12m associated with increased height limits under the Proposed Plan the experienced reduction in sunlight received will be 16% between the Proposed Plan Change and the Operative Plan.

Figure 1: Block form 12m and 18m maximum height limits

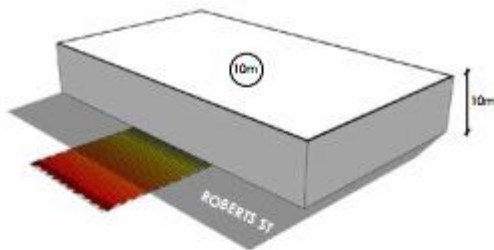


Figure 2: Enabled development at individual site level and with Urban Design controls.



Figure 3: Shading comparison Operative vs Proposed Plan Change

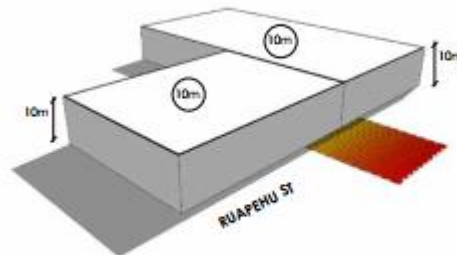
A. CURRENT HEIGHT SCENARIO



The theoretical average number of sunshine hours received on a 20x20m area of Roberts Street, with a 10m maximum height limit is 8131.01 hours. Note that this does not take into account weather conditions or wider topographical features and is simply based on a simple 'bulk and location' model.

1. INDICATIVE 3D MODEL

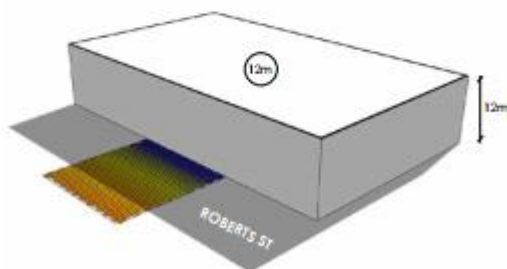
B. CURRENT HEIGHT SCENARIO



The theoretical average number of sunshine hours received on a 20x20m area of Ruapehu Street, with a 10m maximum height limit is 9558.10 hours. Note that this does not take into account weather conditions or wider topographical features and is simply based on a simple 'bulk and location' model.

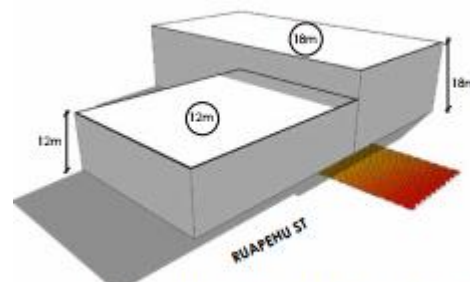
1. INDICATIVE 3D MODEL

B. PROPOSED HEIGHT SCENARIO



With an increase in the maximum height limit to 12m, the average number of sunshine hours received on the grid would reduce to 7481.82 hours. This is a 8% decrease on the number of hours of sunlight received.

C. PROPOSED HEIGHT SCENARIO



With an increase in the maximum height limit to 12m and 18m, the average number of sunshine hours received on the grid would reduce to 8072.31 hours. This is a 16% decrease on the number of hours of sunlight received.

2.4.1.3 Resource Consent analysis of infringements of the building height rule

There has been a handful of resource consents for the Town Centre Environment that have sought to breach the maximum height limit of three (3) stories.

For the proposed hotel development at **29 Tūwharetoa Street**, the initial proposal of seven floors above ground level (including a roof-top bar) was scaled back to a six story hotel and agreed by consent order³⁶ in June 2020, including as supported by expert evidence on matters such as urban design.

For the proposal at **29 Tongariro Street** to provide for 12 apartments over an existing (Cobb & Co) building - (some four storeys at 14.28m RL) with environmental effects including shading and urban design considered to be acceptable in the Town Centre Environment (Figure 4). Consent was issued in February 2022.

At **48 Lake Terrace**, a three-storey visitor accommodation complex, including bar and restaurant was consented in December 2021.

Figure 4: Urban Design context of development consented at 29 Tongariro Street.



The importance of these resource consents to the matter of the Proposed Plan change is two-fold:

- (a) It demonstrates a market desire as associated with this component of the Taupō Town Centre in terms of reinvestment and intensification of built form, this is widely attributed to the vitality and viability of this part of the Taupō Town Centre to facilitate

³⁶ A legal process pursuant to section 279 of the Resource Management Act where Appeals are able to be resolved with the need to attend a Hearing at Environment Court.

reinvestment in combination with its visual and physical connections to the Lake Taupō foreshore.

- (b) As of the date of drafting, these resource consents have not been implemented, nor have been given effect to. However, they demonstrate that:
- i. consents to breach the operative Plan heights can, and have been granted; and
 - ii. when / should these developments occur they will change the Taupō Town Centre environment. That is the context of the skyline will contain larger scale buildings than currently present. This does not impose a duty or obligation on the District Council to ensure that by virtue of that consent, the Council should amend the height limits to provide for and enable the consented the activities but does alter the basis by which height limits should be considered (as is the purpose of this overall s32 assessment).

2.4.1.4 Comparable Height Limits in other District Town Centres

The maximum building coverage requirements of New Plymouth City (New Plymouth Proposed Plan), Levin Town Centre (Horowhenua District Plan), Rotorua City Centre (Rotorua District Plan) and Ashburton Town Centre (Ashburton District Plan) were used for comparative purposes (**Figure 5**).

The comparison table also identifies where Urban Design control discretion is also provided to the Council to consider the built form context of these buildings.

The comparable Town Centres were chosen, given relativities to the Taupō Town Centre Environment in terms of population size. New Plymouth and Rotorua are also of relevance as their Town Centre (zones) are associated with higher-than-average levels of international and domestic tourism and valued adjacent natural outlooks.

Figure 5: Comparative Town and City Centre Height Limits

District Plan	Permitted Maximum Height Limit
New Plymouth	Prime City Centre (Zone)* <ul style="list-style-type: none"> • Area C – 17m • Area D – 22m
Levin	15m (Pedestrian Precinct)
Rotorua	City Centre Zone <ul style="list-style-type: none"> • CCZ1 – 20m* • CCZ2 – No height limit • CCZ3 – 20m
Ashburton	15m

* Also subject to urban design provisions.

The comparable permitted maximum heights in Town Centre (zones) for those District Plans listed exceed those currently provided in the Taupō District Plan (three (3) storeys is assumed to correspond to some 10m of total building height).

Two of the District Plans, New Plymouth and Rotorua, incorporate urban design controls to ensure targeted consideration of built form context and materiality as associated with new or redeveloped buildings.

All of the District Plans also had performance standards as associated with the provision of verandas, extent of glazing, setbacks and signage as similar to those prescribed in the Taupō Town Centre Environment – Pedestrian Precinct.

2.4.2 Certainty in excluding veranda requirements for Service Lanes

No technical work was commissioned in terms of this matter. The necessity for the Proposed Plan Change relates to increased certainty as to the application of provisions, and reducing unnecessary resource consents in the application of the District Plan.

The relevant provision³⁷ seeks to ensure that buildings provide a veranda that extends the full length of the site frontage along any *road*.

Road as defined in the District Plan as having the same meaning as (s315) of the Local Government Act. However, that definition is broadly set and includes:

road means the whole of any land which is within a district, and which—
and includes—
(a) *except where elsewhere provided in this Part, any access way or service lane which before the commencement of this Part was under the control of any council or is laid out or constructed by or vested in any council as an access way or service lane ... (emphasis added)*

Accordingly, an unintended consequence of the operative rule is to require either: the provision of verandas as associated with new building development fronting service lanes; or resource consent being obtained to avoid such.

It is not considered appropriate to require verandas to be established above the Town Centre Environment's service lanes.

Amenity improvements to buildings within the Town Centre Environment should be focused on those pedestrian frontages and shop fronts frequented by the public, not associated with service lanes and back of house 'working areas' associated with commercial enterprises; for similar reasons the public should preferably not be encouraged to traverse through such areas given the use of delivery and heavy vehicles and the potential for **transport conflicts**; lastly, in terms of **economic efficiency**, it is neither prudent nor appropriate to require investment (or resource consent to avoid) in the need to establish verandas on service lanes.

³⁷ Rule 4g.1.11 (Pedestrian Precinct) and Rule 4g.1.15 ((Retail Expansion Precinct).

2.4.3 Increase in the frequency of Temporary Activities in Tongariro Domain

Staff undertook the following analysis:

- Consideration of previous events being undertaken within Tongariro Domain
- Consideration of TDC Temporary Event activity rules against other district plans representative of similar scale Town Centres.
- Consideration of background to events, including registered noise complaints.

2.4.3.1 Consideration of efficiency and effectiveness of the current provisions.

Under the Operative Plan provisions³⁸ any single temporary activity is a permitted activity, even in the event it breaches performance standards (such as noise, parking, loading and access) where (all of the following are conjunctively achieved):

- (a) The event / temporary activity itself does not exceed a total of three operational days in any one calendar year;
- (b) No new permanent structures are constructed;
- (c) The activity is returned to a pre-event condition; and
- (d) The total number of non-event days (that is setting up and decommissioning the site and facilities outside of days associated with operational days).

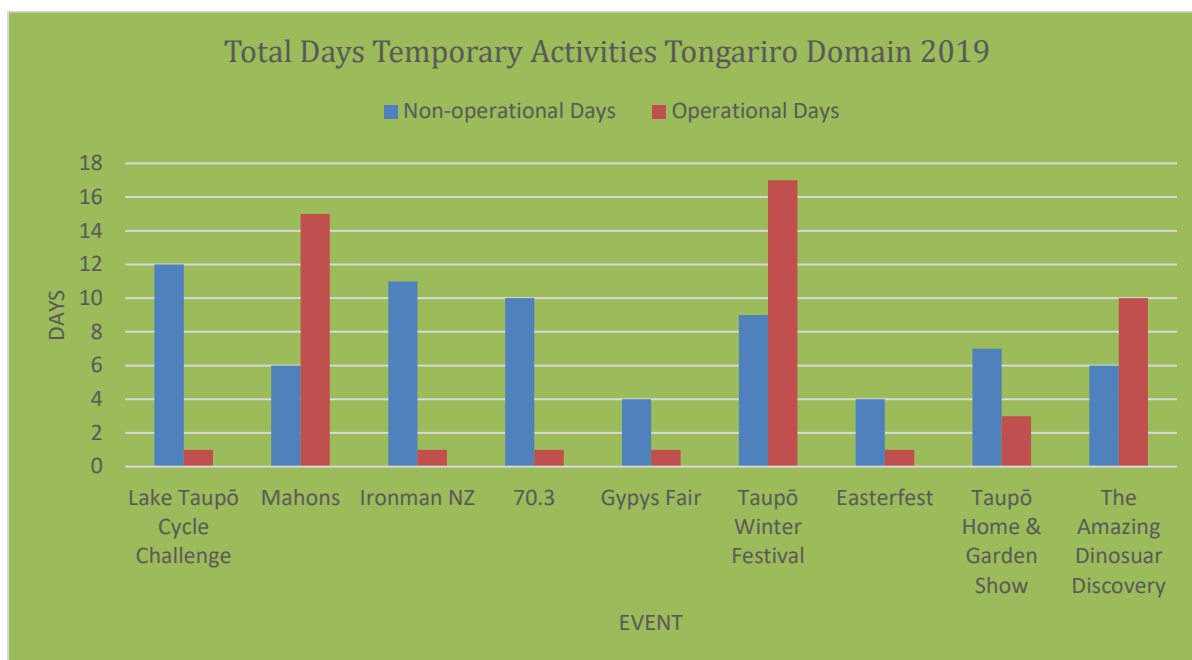
The total number of days (Operational and Non-Operational) for events undertaken in Tongariro Domain (using 2019 as a base year) is shown in **Figure 6**. As can be seen, the Operative Plan provisions do not provide for the frequency and duration of events undertaken on Tongariro Domain.

It is not considered that the operative provisions for Temporary Activities as associated with Tongariro Domain are either:

- *efficient* in recognising and providing for the extent and scale of events which result in substantial social, cultural and economic wellbeing to the district, nor
- *effective* given the misalignment with the number of events the Operative Plan seeks to facilitate, and the actual number of events undertaken.

³⁸ Rule 4g.2.2

Figure 6: Total number of Days – Temporary Activities Tongariro Domain



2.4.3.2 Comparable controls on Temporary Activities in other Districts

The maximum Temporary Activity provisions of the New Plymouth Proposed Plan, Christchurch District Plan, Rotorua District Plan and Queenstown District Plan were used for comparative purposes (**Figure 5**). These districts were chosen given they are locations associated with higher-than-average levels of international and domestic tourism.

District	Event Days	Additional Requirements
Christchurch City	(i) Four consecutive weeks; or (ii) Six Weekends in any one year; or (iii) 12 non-consecutive days in any one year.	Location dependent, including maximum number of days, hours of operation and noise levels received at the nearest residential boundary.
	Specific Purpose (Ōtākaro Avon River Corridor) Zone until 01 July 2024. (i) No restrictions subject to criteria (distance to residences) and undertaken by Crown, Regional Council or the City Council.	By way of example: Hagley Park – 30 days per year, 9am to 22:30pm, 85 L _{max} and 50 L _{Aeq} .
New Plymouth District	Commercial and Open Space Zones: (i) Duration of event (excluding non-operational days) does not exceed 3 consecutive days.	Hours of operation 8am to 10:30pm. Compliance with Temporary Noise Standards (NOISE-S1) at sensitive zone boundaries).

		Maximum capacity – 5,000 people.
Queenstown Proposed Plan (Decisions Version)	Open Space and Recreational Zones (Permitted).	Sanitation Where the night-time noise levels of the relevant zone are in effect (except New Years Eve) – that is 10pm to 8am.
Rotorua District Plan	City Centre 1 and 2 Zones, Reserve Zones – Permitted.	Amplified music shall not occur between 8am and 10:30pm (Sun to Thursday) or 11pm (Friday and Sat).

The comparable District Plan examples all explicitly provide for Temporary Activities, in a manner that provides exemptions to the application of performance standards in the respective zones. There is no standardised set of principles applied to the provision of Temporary Activities and Events across the four comparison Districts.

Christchurch District and New Plymouth District are relatively directive seeking to link the frequency of events with operating hours, with the former being specific to locations and application of noise levels.

Queenstown and Rotorua are relatively permissive, providing for events without frequency limitations but imposing application of noise limits, as generally associated with night-time noise levels.

2.4.3.3 Consideration of background to events, including registered noise complaints

A review of the Taupō District Council complaint register for recent events undertaken at Tongariro Domain reveals only one (1) noise complaint³⁹. That complaint is as associated with the 2019 Summer Concert at Tongariro Domain and was recorded from the ISITE adjacent to the concert. It is noted that there were noise complaints in 2008 which led to the preparation, hearing and decision of RM090195 (2010).

The main site for undertaking concert events is the Taupō amphitheatre as used for a number of different styles of concerts, festivals and events. The site is a large grass bowl with a temporary stage erected as required. There are sealed public pathways and amenity trees and planting around the site. Vehicle access is gained via Redoubt Street. Events within the amphitheatre are subject to the conditions associated with RM090195A (2015) which provides for the Summer Concert series. These requirements include (Conditions 4 and 5):

4. The consent holder shall ensure that concerts or events held at the Taupo Amphitheatre do not exceed the following limits at the closest residential boundary:

<i>Event Category</i>	<i>Maximum Number of Events</i>	<i>Hours of Operation (Noise)</i>	<i>Noise Limits dBA Leq (5 minutes)</i>

³⁹ Complaint ID# 1901788

A1	1	Up to 7 hours between 10am and 10.30pm	80
A2	3	Up to 4.5 hours between 10am and 10.30pm	80
B	3	10am- 10pm	65
1 – New Years Eve	Up to 7 hours between 10am and 12.30am	65	
C	8	10am – 10pm	60

- i. *The noise from any music shall not exceed the above levels by more than 13dB at 63Hz and 10dB at 125Hz.*
 - ii. *The noise shall be measured in accordance with the requirements of NZS 6801:2008 Acoustics – Measurement of Environmental Sound and assessed in accordance with the requirements of NZS 6802: Acoustics – Environmental Noise except that Clause 6.3 of NZS6802 shall not apply.*
5. *The consent holder shall ensure that testing of the sound system does not exceed a maximum of two hours total duration prior to an event and that testing occurs between the hours of 10.00 am and 6.00pm on the day of OR the day prior to an event. The consent holder shall, no later than 3 working days before the event, advise Taupo District Council when the noise testing is to occur.*

Sound monitoring has been undertaken for the Summer Series which has included concerts from Gin Wigmore (2021), Billy Idol (2020), Supertramp (2019) and Heart (2015). Whilst these concerts were all held during daytime hours (that is ceasing prior to 10pm, testing has identified that noise levels received at the nearest Residential Environment boundary did not exceed 80dBA Leq (5 minutes).

2.5 Engagement

Section 3 of the RMA sets out the consultation requirements as below:

- 3(1) *During the preparation of a proposed policy statement or plan, the local authority concerned shall consult –*
- (a) *the Minister for the Environment; and*
 - (b) *those other Ministers of the Crown who may be affected by the policy statement or plan; and*
 - (c) *local authorities who may be so affected; and*
 - (d) *the tangata whenua of the area who may be so affected, through iwi authorities; and*
 - (e) *any customary marine title group in the area.*
- 3(2) *A local authority may consult anyone else during the preparation of a proposed policy statement or plan*

Section 3(1) above is mandatory while Section 3(2) is at the discretion of the Council. In this instance, Council undertook discretionary consultation in relation to this amendment.

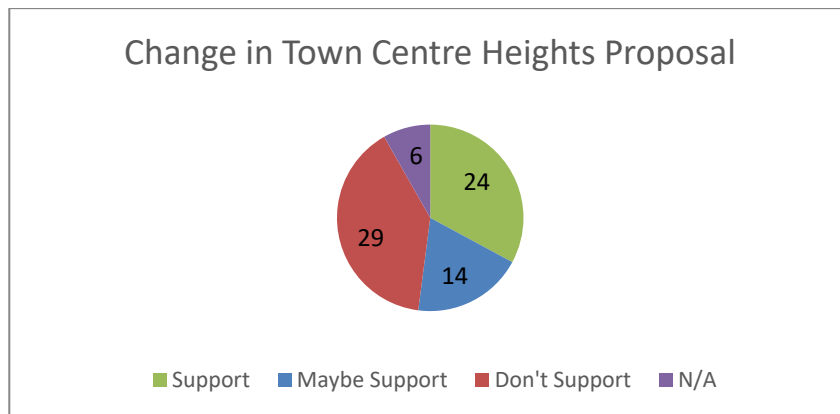
Community consultation was undertaken in May and June of 2022, closing Monday 13 June 2022. The Background and Engagement Summary Report which accompanies the suite of

Plan Changes provides a more detailed description and register of all consultation undertaken with the Plan Change.

2.5.1 Consultation - Increased Height Limits for a defined area of Taupō Town Centre Environment

There was a total of 73 feedback points received on building heights. Of these feedback points 24 (33%) were in support, 29 (40%) were in opposition, 14 (19%) said maybe and 6 did not state a position.

Figure 7: Consultation feedback on changes to Building Heights



Of the feedback that **opposed** the draft concept the following reasons were given:

- 11 submitters were concerned about shading.
- 8 submitters raised concerns regarding building scale.
- 5 submitters were concerned that views would be obstructed.
- 6 submitters gave no reason for their opposition.

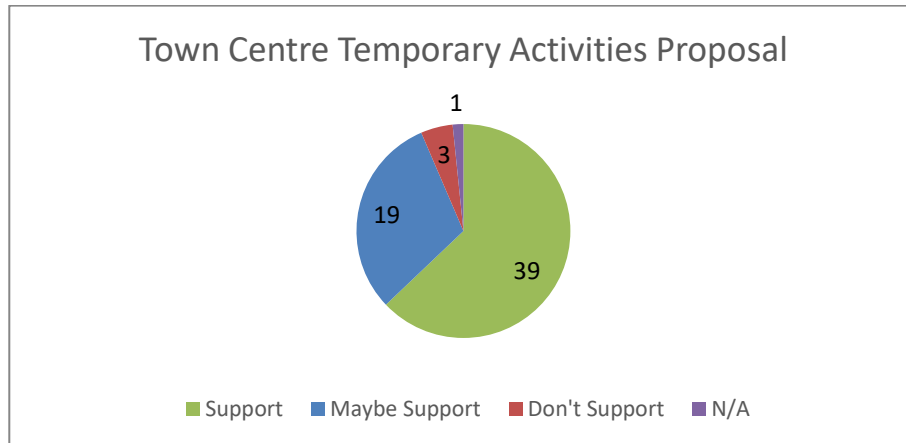
Feedback in **support** of the changes in Building Heights included:

- That the proposal would assist in modernising and improve the town.
- Having tiered developments adjacent to the Lake Front would allow for increased views from these developments over the Lake.
- Would improve the number of people and vitality of the Town Centre, especially after dark.
- It will allow for better resources, particularly towards hospitality and tourism and will bring more spend to the district.
- Changes relating to the urban environment should be aligned with the National Policy Statement on Urban Development 2020 and Chapter 6 of the WRPS.

2.5.2 Consultation - Increase in the frequency of Temporary Activities in Tongariro Domain

There were 62 feedback points received on the temporary activity proposal. Of these 39 (63%) were in support of the changes. 19 (30%) said they might support subject to activity. 3 submitters opposed the proposal.

Figure 8: Consultation feedback on changes to Temporary Activities



Of the submissions that opposed the draft proposal, they either gave no reason or stated that it was three times longer than the current timeframe and therefore seemed excessive.

Feedback in **support** of the changes increasing the number of Temporary Activities able to be conducted in the Tongariro Domain included:

- That the changes would help improve the Town.
- We want to continue to be a vibrant town that makes it attractive to events and other activities.
- The events are part of what defines the Town, and we need to accommodate the temporary structures that come with these events.
- Should be dependent on the activity.

2.5.3 Iwi Authority Consultation

Clause 3 of Schedule 1 of the RMA sets out the requirements for local authorities to consult with tangata whenua through and iwi authorities.

The Background and Engagement Summary Report which accompanies the suite of Plan Changes provides a more detailed description and register of consultation undertaken with iwi in terms of the preparation and issues raised by mana whenua as associated with the Plan Change.

Section 2.1 of the Background and Engagement Summary Report sets out the relevant iwi authorities in the Taupō District, with Table 3 of that Report setting out the key milestones in terms of engagement dating back to June 2019, noting that that engagement was substantially broader than the specific matters associated with Plan Change 40.

Specifically in terms of PC40 a pre-consultation phase (May to June 2022) involved the 'package' of the Town Centre Plan Change – concept of increasing height in the town centre

and adjusting temporary activity rules, being issued to relevant Iwi partners for consideration and feedback. It should be acknowledged that the pre-consultation phase (May 2022) on the draft plan changes no feedback was received from iwi authorities in relation to the Town Centre changes.

3 SECTION 32 EVALUATION

3.1 Key Resource Management Issues

The key resource management issues associated with the provisions are as follows:

- Town Centre Environment – Pedestrian Precinct, **Building Height:** *The manner in which physical resources represented by commercial properties in the Town Centre can be utilised to increase intensification of investment, redevelopment of building stock, and greater productivity and employment. However, if not managed can disperse investment and can also result in increased shading, dominance and poor urban design outcomes.*
- Town Centre Environment – Pedestrian Precinct / Retail Expansion Precinct, **Verandas:** *The requirement of verandas on key pedestrian roads and lanes can improve weather protection and amenity for intensively used pedestrian areas of the Town Centre. Clarity as to application of requirements is important to ensure investment in weather protection is targeted, and to avoid encouraging pedestrians into service lanes which may conflict with back of house activities.*
- Town Centre Environment – Pedestrian Precinct, **Temporary Activities:** *The extent of Temporary Activities provided for in the District Plan for Tongariro Domain is regularly exceeded by the frequency of events being undertaken. More effective plan provisions are required to recognise the extent and frequency of events and temporary activities, as well as non-operational days (which in themselves are relatively benign in terms of environmental effects) associated with these activities.*

3.2 Scale and Significance

The proposed amendments are minor - moderate and while being restricted to the Taupō Town Centre - Environment will have a degree of significance on landowners who are:

- Enabled by the increase opportunities provided by changes in building height;
- Clarity as to the application of veranda requirements; and
- Certainty as to the number of Temporary Activities provided for.

The proposed amendments will enable landowners in the Building Height Spatial overlay to a moderate degree, and the wider community to a lesser extent, to provide for their economic, social and culture wellbeing through increased building and redevelopment opportunities.

Clarity associated with Temporary Activities will increase community social and culture wellbeing as to the frequency of events and hosting opportunities available.

3.3 Evaluation of the Objectives

There are no proposed objectives or amendments to objectives and thus an assessment of the objectives against the Purpose of the Act is not required.

3.4 Assessment of the Provisions

Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

Section 32(1)(c) requires a consideration of the scale and significance associated with the implementation of the Proposal. **Attachment C** sets this analysis out for changes associated with Building Height and Temporary Activities.

3.4.1 S32A - Increased Height Limits for a defined area of Taupō Town Centre Environment

3.4.1.1 Policies

No policies are sought to be amended in terms of this aspect of the Proposed Plan Change.

Pursuant to s75(1)(c) of the Resource Management Act 1991:

's75(1) A district plan must state – (c) the rules (if any) to implement the policies'

The provisions (rules) to be considered for the purposes of s32(1)(b) are to be considered in terms of being the 'more appropriate' to achieve and implement the relevant provisions as identified in Section 2.2 of this report, in addition as outlined in Section 2.3 there is a need to consider whether the provisions achieve the Strategic Objectives and Policies. Specifically, to be considered is the extent to which the provisions will implement:

Policy 3s.2.2(ii) *Maintain and enhance the character and amenity of the Taupō Town Centre Environment by controlling the bulk, location and nature of activities through:*

- a. *the provision of maximum allowable heights for given locations or precincts to enable the maximum development of usable floor area to provide a sense of enclosure to the streetscape. (emphasis added)*

3.4.1.2 Rules

Identification of Provision Options

Option 1: Status quo

Option 2: Insert a spatial overlay providing for tiered heights of 12m and 18m **without** urban design controls.

Option 3: Insert a spatial overlay providing for tiered heights of 12m and 18m **with** urban design controls.

Option 4: Provide for an increase in heights (18m) across the entire Taupō Town Centre – Pedestrian Precinct.

Table 1: Assessment of Provision Options– How effective are the provisions in achieving the objective

Option	Source	Relevance	Recommendation
Option 1: Status quo	Current Performance Standards	<p>Meets the objective in maintain and enhancing the amenity values.</p> <p>Manages the bulk and dominance of buildings across the three Town Centre Environment Precincts.</p> <p>Development pressure through granted consents identify demand for increased opportunities for height and intensification in this prime part of the Town Centre Environment.</p> <p>Reduced certainty in terms of consenting and administration of the Plan as to metrics associated with a three (3) story maximum height limit as expressed in the District Plan.</p>	<p>Discard.</p> <p>Approach does not distinguish between those areas of the Town Centre environment where there is greater pressure and market demand for increased height and intensification.</p> <p>Height limit of three (3) storeys is less than a number of comparable District Plan standards for Town Centre environments, potentially reducing investment certainty and redevelopment opportunities.</p>
Option 2: Spatial overlay for increased heights without Urban Design controls.	Approach consulted on (May / June 2022).	<p>Provides for increased certainty of redevelopment opportunities and fostering a compact Town Centre.</p> <p>Concerns expressed in the consultation feedback as to contextual 'fit' of new higher buildings in this location.</p>	<p>Discard.</p> <p>Approach is not the more appropriate to achieve and implement Objective 3s.2.2 to maintain and enhance the character of the Taupō Town Centre Environment.</p>
Option 3: Spatial overlay for increased heights with Urban Design controls	<p>Feedback from consultation.</p> <p>Analysis of other district plans.</p>	<p>Provides for increased certainty of redevelopment opportunities and fostering a compact Town Centre, in conjunction with ensuring targeted urban design controls on context and materiality.</p>	<p>Considered the more appropriate to achieve Objective 3s.2.1 and 3s.2.1, as well as implement Policy 3s.2.1(i), (ii) and Policy 3s.2.2(i) and (ii).</p>
Option 4: Increase in heights (18m)	Represents a considerable 'up zone' of the	Enables substantial increases in development	Discard

across the entire Taupō Town Centre – Pedestrian Precinct.	Taupō Town Centre Environment in a manner provided for (but not mandated) through Clause 1.5 and Policy 3 of the NPS-UD 2020.	capacity within the Taupō Town Centre Environment. Given demand (as a function of household growth) would likely disperse redevelopment across a disparate number of sites rather than consolidate redevelopment.	Does not provide for a compact and coordinated approach to redevelopment and reinvestment in the Taupō Town Centre Environment.
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Preferred Provision Option – Option 3

The basis of this evaluation is founded with Section 2.4.1 of this Report.

Option 3: Spatial overlay for increased heights with Urban Design controls	
Benefits and Costs of Effects (s32(2)(a))	
Benefits	Costs
Environmental	
<ul style="list-style-type: none"> Enabled ability to increase intensification and the efficient use and development of the land resource. Catalyses private development and redevelopment of sites (in conjunction with recent Phase 3 and 4 Tongariro Street public realm upgrades). Adds profile and legibility to commercial hub. Increases (relative) in efficiency between land use and infrastructure provision. Change in Character - Increases in more prominent buildings on this part of the Town Centre fronting Lake Terrace (tempered by urban design controls). 	<ul style="list-style-type: none"> Increased shading (8% to 16%) on public areas at grade dependent on whether adjoining a 12m high or 18m high structure. Change in Character - Increases in more prominent buildings on this part of the Town Centre fronting Lake Terrace (tempered by urban design controls). Disruption in some existing (mainly) private views, (although counterbalanced by the enablement of new views through enabled development).
Economic	
<ul style="list-style-type: none"> Increases development prospects as returns on investment are higher. Increases employment opportunities and density (agglomeration benefits) through increased built form density. Greater flexibility for land users and tenants through the provision of additional floor levels. Provision of a net increase in 32,700m² of developable floorspace. Investment certainty as to appropriate height limits in this part of the Town Centre Environment. 	<ul style="list-style-type: none"> Increased (marginal) compliance costs associated with urban design / architectural evaluation.

Social	
<ul style="list-style-type: none"> • Provides for diversified opportunities above grade for a range of activities (including commercial offices, residential or travellers accommodation). • Stronger sense of connectedness and vitality through increased residential and commercial density as a key focal point within the Taupō Town Centre. 	<ul style="list-style-type: none"> • No material social costs.
Cultural	
<ul style="list-style-type: none"> • No material cultural benefits 	<ul style="list-style-type: none"> • No material cultural costs
Economic Growth and Employment Opportunities (s32(2)(a)(i)(ii))	
<p>The proposed change enables an additional 32,700m² of potential built environment (business development capacity) and provides for the encouragement of increased employment density and additional commercial and retail sector employment.</p> <p>These gains are material, but are relative (minor - moderate) in the context of the overall extent of developable area in the Taupō Town Centre Environment.</p>	
The efficiency and effectiveness of provisions (s 32(1)(b)(ii))	
<p><i>'Efficiency' to be the measure of whether the provisions will be likely to achieve the objectives at the lowest total cost to all members of society, or achieves the highest net benefit to all of society</i></p> <p><i>'Effectiveness' is considered as the measure of contribution new provisions make towards achieving the objectives of the plan, and how successful they are likely to be in solving the problem they were designed to address⁴⁰</i></p>	
<p>Efficiency:</p> <p>The environmental, economic and social benefits of this option (Option 3) to both individuals (landowners) and the community as a whole significantly outweigh the costs. Costs as they are, are associated with shading and changes in character – however these are also tempered through the application of discrete urban design considerations.</p>	
<p>Effectiveness: The proposed change will be effective in achieving the Operative Plan objectives which seek that character and amenity of the Taupō Town Centre is maintained and enhanced, and reinforced and strengthened in terms of its primacy within the District. The (Proposed) Strategic Objectives seek to provide for well-functioning urban environments.</p>	
Risk of acting or not acting if there is uncertain or insufficient information (s32(2)(c)):	
<p>There is no uncertainty or insufficient information.</p>	
Appropriateness:	
<p>The amendment is appropriate as it achieves Objective 3s.2.1 and 3s.2.2. The amendment will also achieve Proposed Strategic Objective 2.3.2.1 and 2.3.2.5</p>	
Reasons for deciding on the provisions (s32(1)(b)(iii))	
<p>The proposed increase in buildable height from three storeys (circa 10m) to 12m or 18m as delineated within the spatial overlay will facilitate additional development capacity and reinvestment within a prime area of the Taupō Town Centre Environment – Pedestrian Precinct. In addition, the proposed amendments are associated with discrete urban design considerations to ensure that</p>	

⁴⁰ Mfe.govt.nz Guide to Section 32 of the Resource Management Amendment Act, pg 18

resultant built form maintains and enhances the Taupō Town Centre character and amenity, whilst providing for greater intensification and employment opportunities.

The proposed amendment will assist the Council in achieving its functions under s31 of the RMA1991 and the purpose of the Act by enabling people and communities to provide for their social, economic, and cultural well-being and for their health and safety.

3.4.2 S32A - Increase the frequency of Temporary Activities in Tongariro Domain

3.4.2.1 Policies and Rules

Provisions have been bundled where they are expected to work together to achieve the objective(s). For efficiency, this evaluation focuses on the approach and the policies and rules which implement that approach as a package.

Identification of Provision Options

Option 1: Status quo

Option 2: Amend **Policy 3s.2.1(iii)** to be explicit as to the enablement of Temporary Activities within Tongariro Domain

Amend Rule 4g.2.2 to increase the frequency of operational and non-operational days associated with a (single) event from 3 to 4 (operational days) and 5 to 14 (non operational days) within any six month period..

Option 3: Amend **Policy 3s.2.1(iii)** to be explicit as to the enablement of Temporary Activities within Tongariro Domain.

Amend Rule 4g.2.2 to insert a frequency / scale / noise scale limitations for events within Tongariro Domain (similar to Christchurch City).

Table 2: Assessment of Provision Options– How effective are the provisions in achieving the objective

Option	Source	Relevance	Recommendation
Option 1: Status quo	Current Performance Standards	Not providing for the current volume and frequency of events (operational and non-operational days) being undertaken within Tongariro Domain. Strict compliance would either be less appropriate in terms of achieving Objective 3s.2.1 in terms of strengthening the recreational, cultural and entertainment role and	Discard. Approach does not provide for current nature of Temporary Activities, and would impact on social, economic and cultural wellbeing.

		function of the Taupō Town Centre, and / or increase compliance costs.	
<p>Option 2:</p> <p>Amend Policy 3s.2.1(iii) to be explicit as to the enablement of Temporary Activities within Tongariro Domain</p> <p>Amend Rule 4g.2.2 to increase the frequency of operational and non-operational days associated with a (single) event from 3 to 4 (operational days) and 5 to 14 (non-operational days) within any six month period.</p>	<p>Approach consulted on (May / June 2022).</p>	<p>Provides for increased certainty of Temporary Events associated with the use of Tongariro Domain.</p> <p>Predicated on continued reliance on RM090195A for Summer Series events to ensure appropriate controls of amplified music.</p>	<p>Considered the more appropriate to achieve Objective 3s.2.1. For the purposes of s74(1)(c), the amendments in Policy 3s.2.1(iii) would explicitly provide for Temporary Activities within the District Plan Framework.</p>
<p>Option 3:</p> <p>Amend Policy 3s.2.1(iii) to be explicit as to the enablement of Temporary Activities within Tongariro Domain</p> <p>Amend Rule 4g.2.2 to insert a sliding scale of frequency / scale / noise metrics as limitation for events within Tongariro Domain (similar to Christchurch City).</p>	<p>Analysis of other district plans.</p>	<p>Provides for increased certainty of Temporary Activities, but tempered with increased rules as to the scale, size, hours of operation and noise effects associated with each individual event. Whilst these considerations can manage potential amenity effects associated with events, the approach provides a very prescriptive approach which may deter events and increase compliance costs.</p>	<p>Discard.</p> <p>Approach is not the more appropriate to achieve and implement Objective 3s.2.1 to strengthen and reinforce its role.</p>

Preferred Provision Option – Option 2

The basis of this evaluation is founded with Section 2.5.1 of this Report.

Option 2: Increasing the frequency of operational and non-operational days for Temporary Activities	
Benefits and Costs of Effects (s32(2)(a))	
Benefits	Costs
Environmental	

<ul style="list-style-type: none"> Increases efficiency in terms of the utilisation of Tongariro Domain to facilitate events and hosting opportunities. Adds profile to Taupō District as an event destination, and certainty in terms of hosting events. Including trading off the natural values and character provided by Tongariro Domain in terms of hosting events. Change in Character - Increases density of people and activity in Tongariro Domain. 	<ul style="list-style-type: none"> Provisions are enabling, can result in increases in noise levels received at adjoining zone boundaries (noting Residential Environment is between 50m to 500m from parts of the Domain), and associated Traffic Management Issues (noting that for larger events Taupō District Council facilitates Transport Management Plans with event organisers and reliance on controls in RM090195A). Change in Character - Increases density of people and activity in Tongariro Domain, and on operational days will restrict public access in some parts of the Domain.
Economic	
<ul style="list-style-type: none"> Increases hosting and events able to be undertaken in Taupō District including indirect benefits (accommodation, spend at food and beverage facilities, tourist facilities, and repeat non-event visitation). Increase in economic wellbeing to the Taupō District. 	<ul style="list-style-type: none"> No material economic costs.
Social	
<ul style="list-style-type: none"> Provides for diversified opportunities above grade for a range of Temporary Activities (ranging from elite events to wider public events). Increase in legibility for Taupō township. Increase in social wellbeing to the Taupō District 	<ul style="list-style-type: none"> Potential for increased annoyance and disturbance for those proximate to Tongariro Domain. Limited restrictions for public access in the Domain during events.
Cultural	
<ul style="list-style-type: none"> Opportunities for cultural events to be undertaken at Tongariro Domain. 	<ul style="list-style-type: none"> No material cultural costs
Economic Growth and Employment Opportunities (s32(2)(a)(i)(ii))	
<p>The proposed change provides increased certainty as events and temporary activities are able to be undertaken within Tongariro Domain, with resultant economic benefits to the district.</p> <p>These gains are both material and of substance.</p>	
The efficiency and effectiveness of provisions (s 32(1)(b)(ii))	
<p><u>Efficiency:</u></p> <p>The environmental, economic and social benefits of this option (Option 2) to the community outweighs costs. There will however be the potential for limited social and environmental costs to individuals as associated with noise emissions and reduced access through the Domain during events.</p>	
<p><u>Effectiveness:</u> The proposed change will be effective in achieving the Operative Plan objectives that seek to reinforce and strengthen the role and function of the Taupō Town Centre in terms of its recreational, cultural and entertainment focus.</p>	
Risk of acting or not acting if there is uncertain or insufficient information (s32(2)(c)):	

There is no uncertainty or insufficient information.
Appropriateness:
The amendment is appropriate as it achieves Objective 3s.2.1. The amendment will also achieve Proposed Strategic Objective 2.3.2.1 and 2.3.2.5
Reasons for deciding on the provisions (s32(1)(b)(iii))
The proposed increase in the number and frequency of events and temporary activities being undertaken in Tongariro Domain provides for greater economic and social wellbeing benefits to the Taupō District.

3.4.3 S32A – Certainty for excluding veranda requirements for service lanes

3.4.3.1 Scale and Significance

The scale and significance of this matter⁴¹ is narrow. Accordingly, a truncated s32A assessment is considered below.

	Option 1 – Status Quo	Option 2 – Exclude Service Lanes
Environmental	<p><i>Costs</i></p> <ul style="list-style-type: none"> Creates potential for pedestrian conflicts with back of house activities including deliveries. Creates amenity expectations as associated with weather protection and more ‘working’ areas of commercial businesses. <p><i>Benefits</i></p> <ul style="list-style-type: none"> There are no material benefits. 	<p><i>Costs</i></p> <ul style="list-style-type: none"> There are no material costs. <p><i>Benefits</i></p> <ul style="list-style-type: none"> Increases certainty as to pedestrian focused areas of the Town Centre Environment.
Economic	<p><i>Costs</i></p> <ul style="list-style-type: none"> Either building costs associated with redevelopment, and / or compliance costs for seeking resource consent to not provide weather protection. <p><i>Benefits</i></p> <ul style="list-style-type: none"> There are no material benefits. 	<p><i>Costs</i></p> <ul style="list-style-type: none"> There are no material costs. <p><i>Benefits</i></p> <ul style="list-style-type: none"> Increased certainty as to requirements where sites adjoining service lanes are redeveloped.
Social	<ul style="list-style-type: none"> There are no material costs or benefits. 	<p><i>Costs</i></p> <ul style="list-style-type: none"> There are no material costs. <p><i>Benefits</i></p>

⁴¹ Section 32(1)(c)

		<ul style="list-style-type: none"> Increased public certainty as to pedestrian focused areas of the Town Centre Environment.
Cultural	<ul style="list-style-type: none"> There are no material costs or benefits. 	<ul style="list-style-type: none"> There are no material costs or benefits.

The Proposed Change is considered the more *efficient* and *effective* in that the benefits of the change outweigh any costs, and the change is effective in achieving **Objective 3s.2.2** in so far as providing a focused approach to ensuring weather protection (and amenity improvements) for those parts of the Town Centre where pedestrians are to be encouraged.

There is no uncertainty or insufficient information.

The Proposed Change is the more appropriate in achieving the Plan Objectives.

4 CONCLUSION

The conclusions below are predicated on each of the three amendments proposed through Proposed Plan Change 40 as follows:

Increase in Building Heights in the Taupō Town Centre Zone

The Proposed Plan Change seeks to spatially identify a compact core component of the Taupō Town Centre Environment – Pedestrian Precinct and facilitate increased building heights, and consequently opportunities for redevelopment, reinvestment and employment intensification in this part of Taupō Township. Whilst the Proposed Plan Change may lead to increased building heights, and consequential increases in shading and some changes in urban character, these are considered to be appropriate, with additional urban design controls to consider context and materiality.

The changes are considered to be proportionate to the growth and intensification of the Town Centre and are similar to height limits for comparable Town Centres in New Zealand.

The changes will assist the Council in terms of achieving its functions under the Act, and the purpose of the Act.

Increase in Temporary Activities within Tongariro Domain

This aspect of Proposed Change 40 provides greater alignment between the actual frequency and number of events being undertaken within Tongariro Domain, and the provisions of the District Plan. The economic and social benefits to the district associated with hosting events, and increased profile to Taupō District are material and of substance. Whilst there is the potential for some increased disturbance to proximate sensitive activities this is managed through the total frequency of events, and proximity to residential areas.

The changes will assist the Council in terms of achieving its functions under the Act, and the purpose of the Act.

Certainty for excluding veranda requirements for service lanes

The Proposed Change rectifies an unintended consequence in the drafting of the District Plan which would (without resource consent) require investment in weather protection over

the Town Centre service lanes which would be a less appropriate outcome in terms of amenity and economic wellbeing.

The changes will assist the Council in terms of achieving its functions under the Act, and the purpose of the Act.

**APPENDIX A - TAUPŌ TOWN CENTRE HEIGHT COST BENEFIT
ECONOMIC ANALYSIS (PROPERTY ECONOMICS,
2022)**

PROPERTY **E**ECONOMICS



TAUPŌ TOWN CENTRE

HEIGHT COST BENEFIT

ECONOMIC ASSESSMENT

Client: Taupō District Council

Project No: 52167

Date: June 2022



SCHEDULE

Code	Date	Information / Comments	Project Leader
52167.3	June 2022	Report	Tim Heath / Phil Osborne

DISCLAIMER

This document has been completed, and services rendered at the request of, and for the purposes of Taupō District Council only.

Property Economics has taken every care to ensure the correctness and reliability of all the information, forecasts and opinions contained in this report. All data utilised in this report has been obtained by what Property Economics consider to be credible sources, and Property Economics has no reason to doubt its accuracy.

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1. INTRODUCTION

Property Economics has been engaged by Taupō District Council (TDC) to undertake a high level economic cost benefit analysis of a proposed plan change to increase the building height in a defined area of the Taupō Town Centre.

The analysis in this report is intended to provide Council with a robust economic basis of the appropriateness of the proposed plan change to increase building heights in certain blocks of the Taupō's Town Centre based on an assessment of the economic costs and benefits of the proposed changes.

This report outlines the most pertinent economic costs and benefits for Council to consider when developing the plan change and assist in s32 reporting.

1.1. OBJECTIVES

Key objectives in this assessment are:

- Identify the town centre areas / blocks subject to the proposed change in height and summarise the proposed changes within the broader context of the (re)development / regeneration of Taupō's Town Centre and lakefront area.
- Identify the underlying zone, existing land uses and potential future land uses of the town centre blocks subject to the proposed plan change .
- Identify the associated economic costs and benefits, including positive and negative externalities generated, of the proposed changes in height.

1.2. DATA SOURCES

Information has been obtained from a variety of reputable data sources and publications available to Property Economics, including :

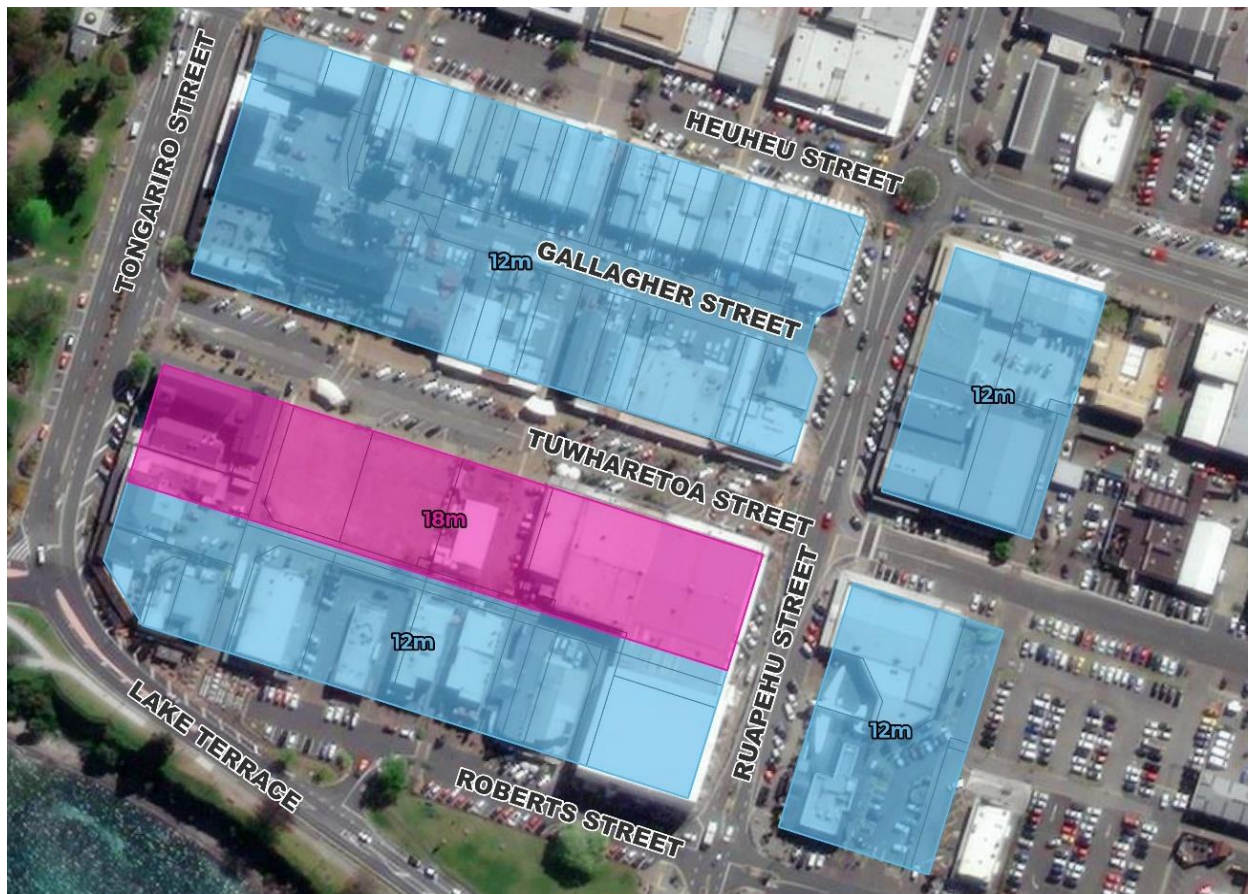
- Business Demography Data – Stats NZ
- Geographic Boundaries – Stats NZ
- Primary Land Parcels – LINZ
- Map – Bing
- Taupō District Plan – Taupō District Council
- National Road Centre Lines – NZTA
- Proposed Town Centre Heights – Taupo District Council

2. BLOCKS SUBJECT TO PROPOSED CHANGE IN HEIGHT

The area / town centre blocks subject to the proposed change in heights is identified in the figure below. This area is in the southwestern area of Taupō's Town Centre, closest to Lake Taupō in the Taupō Town Centre Pedestrian Precinct. The blocks subject to height limit changes are indicative only and based on underlying land parcels.

The proposed height limits change the status quo, of up to 3 storeys, to a maximum height of 12m (blue) in some areas and 18m (pink) as indicated geospatially in the figure below. In practical terms, a 12m height limit is a maximum of 4 storey development and an 18m height limit is a maximum of around 6 storeys.

FIGURE 1: LOCATION OF BLOCKS SUBJECT TO PROPOSED CHANGE IN HEIGHT



Source: Taupō District Council, Bing, LINZ, NZTA.

There are a limited number of properties that currently utilise the full breadth of their vertical potential with most buildings being solely at-grade (ground level) or at-grade with one additional storey. The most notable exception to this is the Base backpackers building which is at-grade with three additional storeys on the western side of the area identified as having a proposed height of 18m.

At-grade we would anticipate a similar mix of activities that are currently in place: Retail, food and beverage outlets (cafés, restaurants and fast food) and commercial services. The increase in height is unlikely to impact the potential for these activities.

The types of activity we would anticipate occurring above grade, in prime Town Centre areas such as this, are residential apartments, professional offices and other commercial enterprises such as short stay accommodation. These activities can utilise above grade space efficiently, and even benefit from being above grade, whereas activities such as a retail on a second level tend not to be sustainable in small provincial centre such as Taupo.

Retail activities generally do not prefer above grade space unless in a highly populated City Centre location or if in a unique high amenity setting as the diminished profile and limited access reduce the viability of these activities.

There may, as a result of increased height limits, reduce the overall at-grade GFA for activities as some multi-storey activities particularly residential apartments, short stay accommodation (hotels, motels, hostels) and office buildings sometimes use the ground floor as a lobby / greeting area. This loss is anticipated to be negligible for three reasons:

1. The total enablement of additional activity outweighs this increase, i.e., the net impact in overall activity is positive as there are more floors of activity enabled,
2. This loss occurs in the identified area, currently, with less benefit as the total level of enabled activity is lower with lower height limits; and
3. It is considered highly unlikely all new multi-storey development would remove at grade commercial opportunities as it typically contributes positively to development feasibility and would be a highly pedestrianised area (Taupō context) suitable for at grade commercial premises.

The existing GFA across the identified areas is estimated at 32,200sqm¹ with a total status quo building envelope of around 71,000sqm of GFA. The proposed height limit changes would increase the total build envelope GFA to around 103,600sqm. A net increase of around 32,700sqm or 46%.

More important to the increase GFA capacity is the increased height improves development potential and feasibility, with the increased height increasing the likelihood of multi-storey development relative to the status quo.

¹ Building footprint x 1.5 storeys (average) x 80% (remove 20% for stairways, lifts, thoroughfares, etc.)

3. TAUPŌ TOWN CENTRE EMPLOYMENT

The following figure shows the employment counts by broad sector of the blocks subject to the increase in heights. This employment count data is measured at the meshblock² level which does not perfectly align with proposed height change areas but represents a 'best fit'. The extent of the meshblock area is identified in Appendix 1.

The employment count provides a high-level understanding of the activity mix and land uses within the area. While it does not identify all activity, such as residential, religious, cultural or community, it provides some understanding of the productive use of the land.

Retail, which includes Accommodation and Food Services, has been the predominant sector within the identified height change areas since 2000. The sector has seen little movement overall and has generally accounted for 500 to 600 employees (557 average) over the 2000 – 2021 period.

The commercial sector in this area has been on the decline since the recording of business demography data began (2000). There were 294 Commercial sector employees in the identified area in 2000, there are now just 170. This represents a decline of 125 net commercial sector employees.

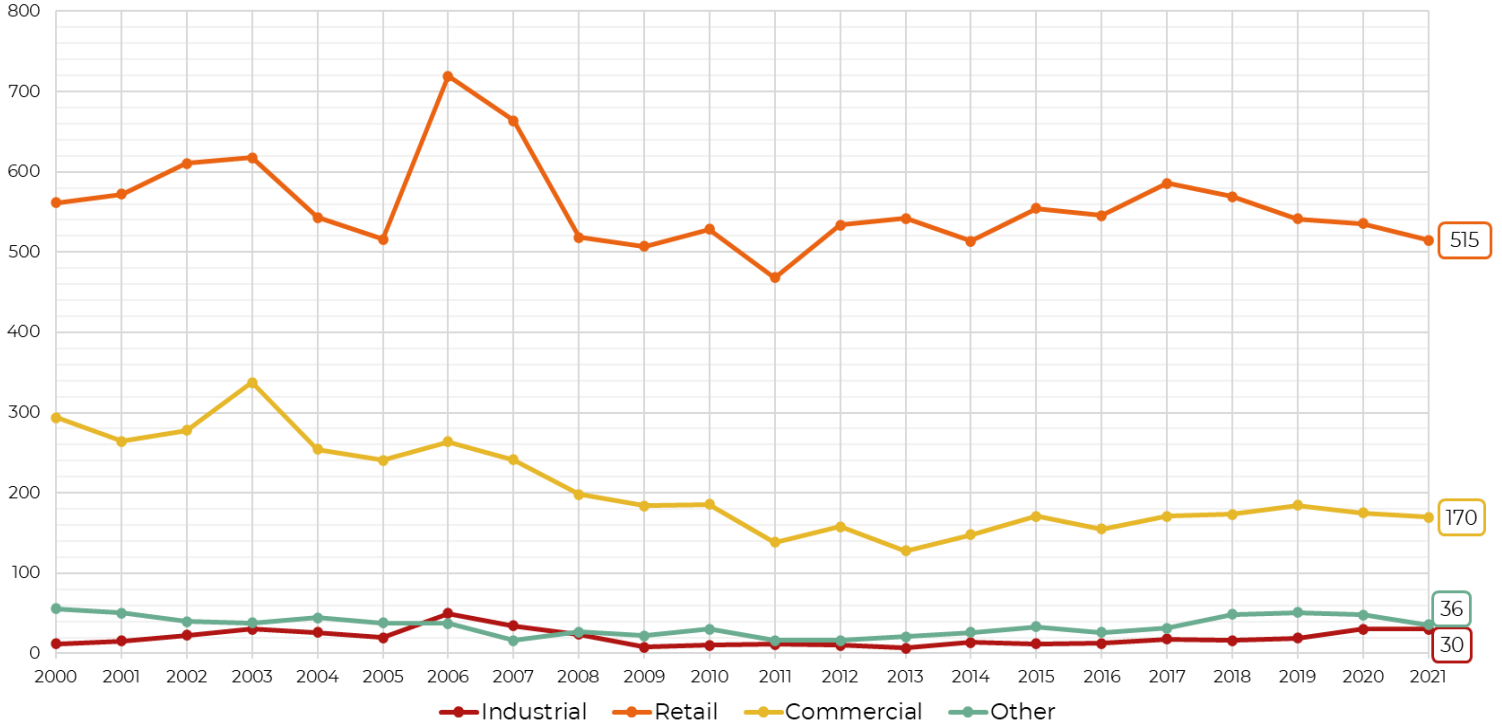
Alternatively, the Commercial sector employment in this area accounted for 32% of all employment in the area, and now represents just 23% of the same area's total employment base. This decline in commercial sector representation is happening in an area that is losing employment overall, which means that the commercial sector is losing employees at a faster rate than other sectors in this area.

The overall declining employment count within the prime area of Taupō's Town Centre is of concern, especially given the land is among one of the highest amenity locations for modern offices in the district and would lend itself well to increased employment density and additional commercial and retail sector employment. Instead, the retail sector has remained relatively stagnant over the past 21-years, and even declined slightly, while commercial sector employment has almost halved in size. This represents a loss of economic productivity of prime town centre land.

The proposed height changes may encourage additional employment as the area is (re)developed to greater scale. The increase in heights enables more intense commercial office employment (more floors → more offices → more employees) and any investment in the built form or increase in foot traffic of the area will encourage further retail activity and employment.

² Meshblocks are the smallest geographical area that Stats NZ publish geostatistical data at. They are roughly the size of a city block but increase in size in more rural areas.

FIGURE 2: PROPOSED HEIGHT CHANGE AREA EMPLOYMENT COUNT BY BROAD SECTOR



Source: Stats NZ.

4. ECONOMIC COSTS AND BENEFITS

The following outlines the high-level economic costs and benefits associated with the increase in heights for the identified areas. There may be other relevant costs and benefits associated with increasing building heights in the fields of social, cultural, planning, etc. that are not identified here.

BENEFITS

- **Catalyses development:** liberalising of land use rights has historically been proven to increase development of associated land. The increase in height limits brings the (re)development timeframe of affected properties forward in time as the return on development is higher (more rents are now achievable).

There is a second order effect also because development encourages more development. As one parcel is (re)developed, neighbouring properties benefit off the improvement in amenity and are encouraged to (re)develop themselves to maximise returns. Such development catalyses other development.
- **Increases the Impetus for higher (re)development:** the ability to build up to a higher level generates an impetus for developers to maximise their build envelope.
- **Consolidation of high-density residential activity:** the increased height limit creates an impetus for higher density residential (apartment) use above grade. This increases the chance of the zone meeting its policy objectives of the Town Centre Environment under the Taupō District Plan to “encourage redevelopment of existing properties in a way that consolidates and diversifies the range of activities...” and also help meet the capacity objectives under the National Policy Statement on Urban Development – including the provision for a diverse range of dwelling typologies.
- **Enhanced housing affordability:** restrictions on building vertical growth can be a contributor that can cause a housing shortage. More permissive building height restrictions, therefore, may have positive consequences for affordable housing where the construction of apartments and other higher density dwellings become more feasible within the height change area. This would further reduce the upward pressure on housing prices within the identified area.
- **Increases employment opportunities:** greater height limits mean more employment GFA opportunities. As the level of commercial floorspace increases more people will be employed in the identified area.
- **A stronger sense of connectedness and vitality:** the increased residential and commercial activity density mean that people are in closer contact with each other. This would enhance the connectedness and vitality of the key location within the Taupō Town Centre.

- **Potential for less land / green space take-up:** a higher density of agglomeration of business activity means that a greater quantity of activity can take place within the identified area. This would suggest that more efficient use of land for commercial space leaves more green space for other uses, such as parks, which the local community can enjoy.
- **More efficient land use:** taller buildings mean land is being used more efficiently as the vertical space is being used more effectively. While premium retail / food and beverage space will likely remain at-grade, a broader range of commercial and residential options are unlocked through the increased building height limits.
- **More flexibility for land users and building tenants:** flexibility is often an attractive part of taller buildings. With the increase of height limits, tenants would be able to expand to other floors within the same building, or sub-let floorspace as needed, with relative ease.
- **More efficient infrastructure use:** The existing and future infrastructure that is put in place to service Taupō residents in and around the town centre is used by a larger number of people. This includes road / footpath network, community facilities – libraries, halls, parks – power and telecommunications, three waters. The larger number of people come in the form of both increased employees using these resources on the way to work and increased residents / tourists living in apartments in the town centre.
- **Increased internalisation of retail spend, and centre spend:** The (re)development of properties will encourage increased foot traffic to the area through employment, local residents and tourists attracted by the amenity.

The area is already an accommodation and food services hotspot for Taupō, because of the proximity to the lakefront, Tongariro Domain and the existing retail / food and beverage, the area will likely develop further in a retail and food and beverage direction but will also have increased expansion potential, upward, for commercial and residential units to accommodate more people.

- **Reduces transport costs and associated emissions:** the increased density enabled by increased building heights will reduce transport costs as a greater number of locals will be able to access the benefits of the Town Centre. This has secondary benefits of lower fuel emissions, and possibly a greater reliance on public transport as more employment options will be collocated on a public transit route.
- **Adds profile as a commercial hub:** development and height create a general feel of commercial professionalism that attracts high tier commercial tenants and main brands to the town centre.

- ⊕ **Generation of new views and enhanced building profile:** a broader range of views from buildings at differing heights are attractive to commercial tenants that want a good view for their office. This can attract high tier commercial tenants for regional / head offices. Meanwhile, for practical floorspace reasons, and sometimes for image reasons, taller buildings are more attractive to large corporations by providing a high-profile space. This is reflected in a prestige factor.
- ⊕ **Market certainty and Simpler planning process and lower Transaction Costs:** as greater heights are allowable within the area already but require a resource consent, this will remove the increased cost and wait time for the resource consent process up to 12m and 18m in the respective areas, and increase market certainty – a critical element to investment in a market. This is particularly relevant given that Property Economics understands a consent for a six-storey hotel was recently approved, albeit it endured a costly and lengthy consenting process.
- ⊕ **Higher level of specialisation and productivity:** as levels of economic activity increase in the same footprint, so does the ability of businesses to specialise and increase efficiency, due to increased competition. This would also increase the prevalence of knowledge spillovers, increasing innovation density allows businesses to have access to larger markets of suppliers (especially labour supply) and consumers, allowing competition to enhance the quality of inputs and outputs.
- ⊕ **Potential to safeguard productive land:** a large proportion of urban centres are currently surrounded by the most productive, or versatile, soils, across the country. As urban centres expand into these productive areas there has been a concern that productive land is not being adequately protected. As such, more floorspace being built within the same footprint will ensure the district has somewhere for its growing population to live and work– mitigating effects on its productive land.

COSTS

- ⊖ **Change in built form and character of Taupō's Town Centre:** The character nature of Taupō's Town Centre may change as buildings get taller within the centre and as the displacement of standalone retail / food and beverage for malls, arcades, offices, and apartments occurs.

This is likely to occur overtime, regardless, as a necessary function of the township transitioning into a city and more room for economic activity is needed. It is also preferable that, as this does occur, the economic centres are managed as much as possible to encourage the most efficient use of land. Whilst potentially viewed as a cost, this could also be viewed as a benefit.

Additionally the recently consented six-storey hotel is likely to change the built form and character of the subject blocks, so a benchmark is already *'in play'*.

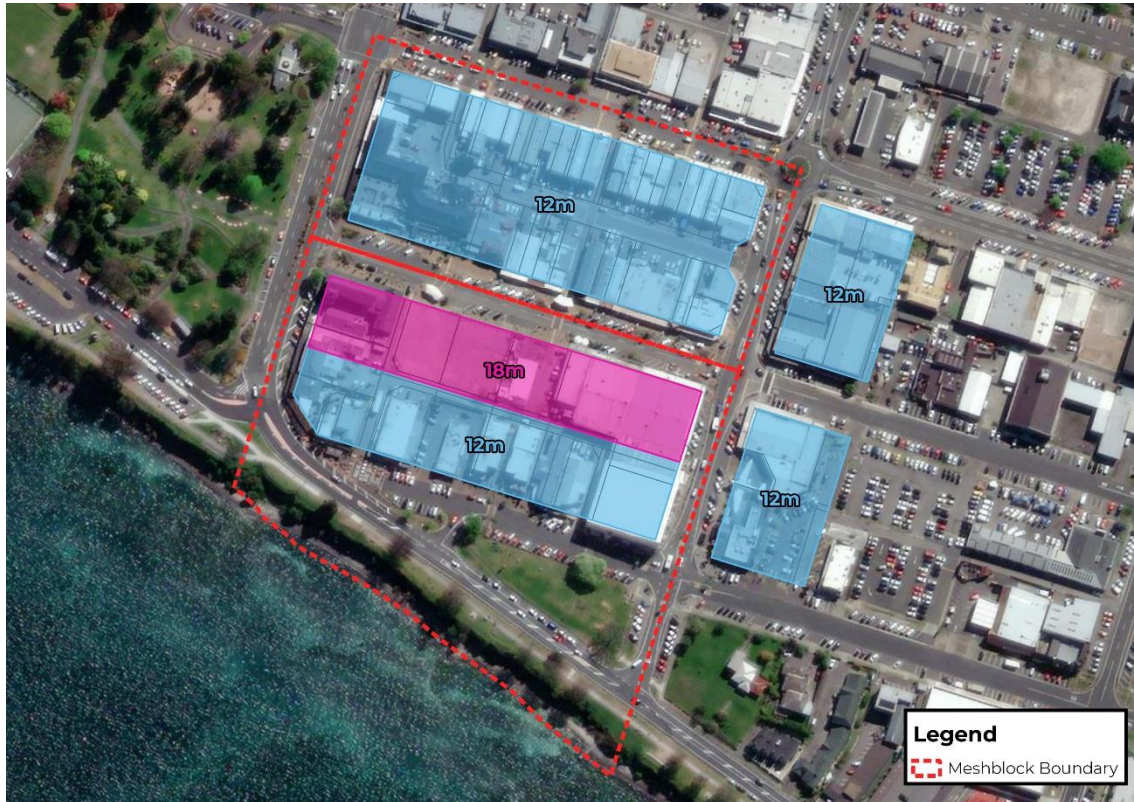
- ➊ **Disruption of views from certain points:** There may be some properties that have their views disrupted by taller buildings. Though it is unlikely that many buildings behind (to the north of) the identified increase in height limit area have significantly appreciable views currently. Again, this could also generate new views that may make it a more attractive proposition to locate business activity within the town centre.
- ➋ **Increased congestion or generation of disbenefits associated with density (crime, noise, pollution, etc.):** Increased density can generate negative externalities, with the most pertinent being increased congestion. The greater level of foot traffic generated through increased development, increased employment and increased high density residential activity may impact the road network and parking space availability in the Town Centre. The increase in disbenefits, including congestion, is unlikely to be immediately appreciable, so traffic flow mitigation will likely be possible with sufficient planning. At this stage, this “cost” is unlikely to materially impact the role and unction of Taupō town centre.
- ➌ **Potential for inappropriate building development:** The proposed building height limit change enables relatively taller buildings within the identified area which may lead to inappropriate building development if managed inefficiently. This would further reduce the amenity value of the identified area and higher maintenance cost to developers / land users.
- ➍ **Potential for property price fluctuations in adjacent areas:** The changed build form within the identified area may impact the current amenity value, business and living environment quality of the adjacent areas. These changes would further influence the attractiveness and, therefore, property prices within the neighbouring areas.

SUMMARY

Having undertaken the high-level economic cost and benefit analysis, the potential economic benefits associated with the proposed plan change of height limits over the subject blocks are considered to significantly outweigh any potential economic costs, particularly when combined with the increasing demand for higher density development within the district. As such, Property Economics supports the proposed building height changes from an economic perspective.

APPENDIX 1: EMPLOYMENT MESHBLOCK BOUNDARIES

The area used to delineate the employment zone of the change in height limit area is made up of two meshblocks. Part of the change in height limit area is outside of these meshblocks but are part of a significantly larger meshblock that includes other activity. The two meshblocks were chosen as broadly representative of the whole employment area.



APPENDIX B - TAUPŌ SHADE ANALYSIS (DCM URBAN, 2022)



A. LOCATION PLAN (NTS)

CLIENT/Project name: TAUPO DISTRICT COUNCIL / Sunshine Analysis
 Drawing name: **LOCATION PLAN**
 Designed by: DAVE COMPTON-MOEN
 Drawn by: DAVE COMPTON-MOEN
 Original issue date: 28 JULY 2022
 Scales: NTS

Revision no:
 A
 B

Amendment:
 Draft Issue for comment
 Final

Approved
 DCM
 DCM

Date
 28.06.2022
 28.07.2022



REGISTERED
 LANDSCAPE
 ARCHITECT



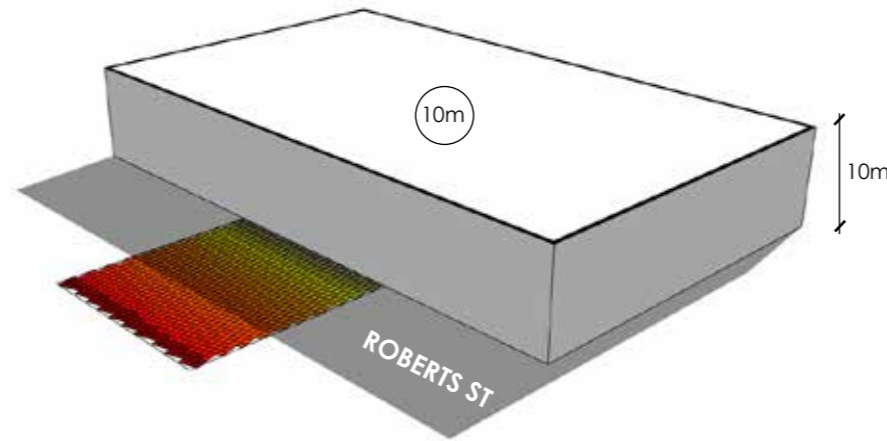
DCM URBAN DESIGN LIMITED
 10/254 ST. ASAPH STREET
 CHRISTCHURCH 8011
 WWW.DCMURBAN.COM

Project no / drawing no: 2022_135 / 001

Revision: B

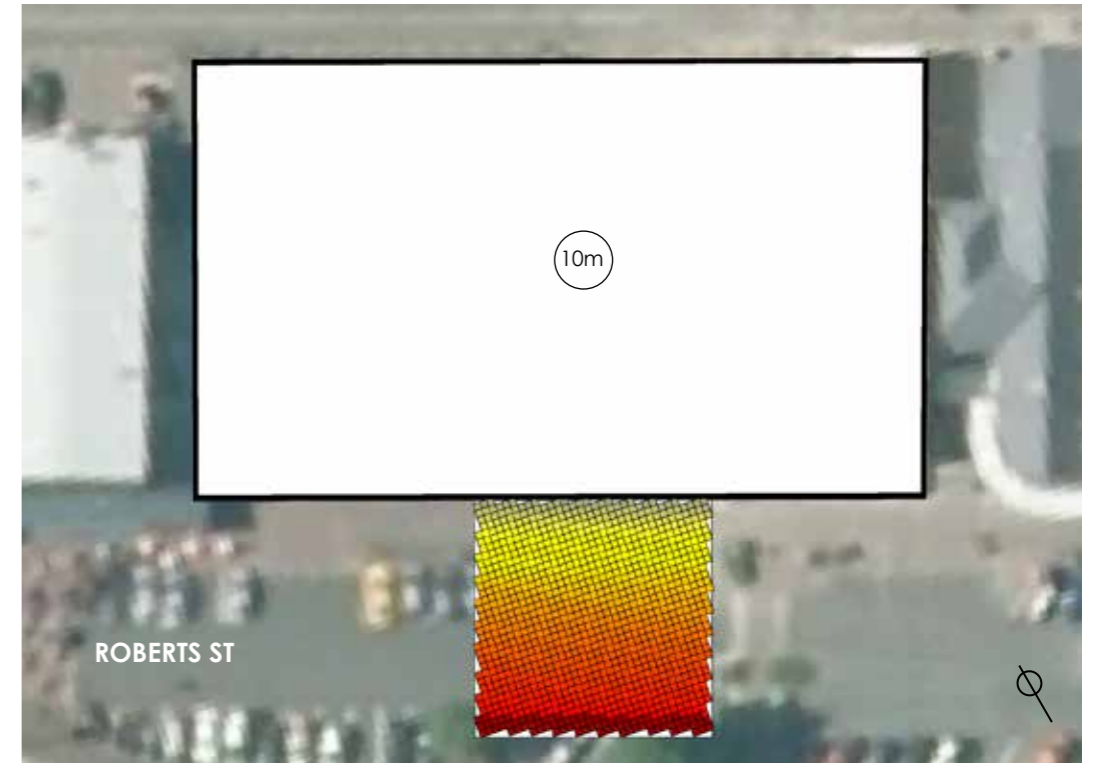
A LOCATION A - ROBERTS STREET

A. CURRENT HEIGHT SCENARIO



The theoretical average number of sunshine hours received on a 20x20m area of Roberts Street, with a 10m maximum height limit is **8131.01 hours**. Note that this does not take into account weather conditions or wider typographical features and is simply based on a simple 'bulk and location' model.

1. INDICATIVE 3D MODEL



2. SHADING ANALYSIS PLAN 1:750 @ A3

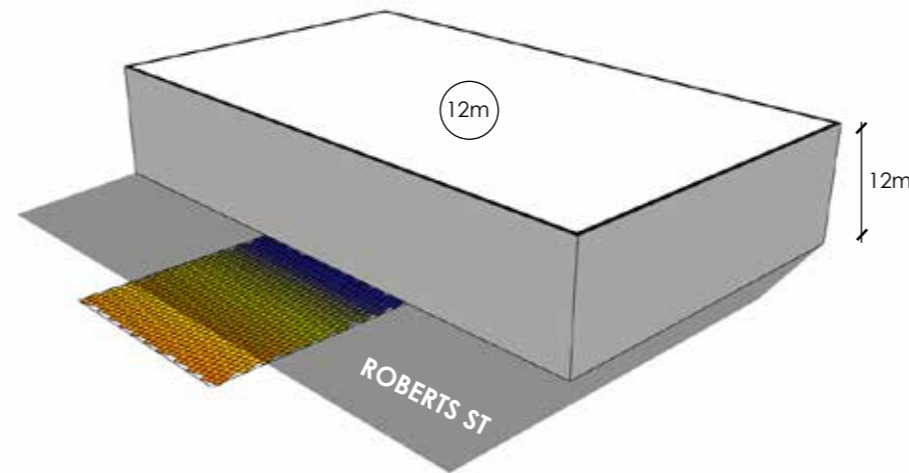
A. 'SUN-HOURS' METHODOLOGY

The coloured grids shown on these drawings represent a 20x20m area, used to show a representative change resulting from changes to the permitted maximum height limit.

The effects on the total number of sun hours received were then assessed for each scenario using a Sketchup plug-in called 'Sun Hours'. The plug-in uses the geo-referenced model and shadow tool in SketchUp to calculate the number of sunshine hours each 0.25m² grid square (0.5m x 0.5m) of a rear yard (assumed to be the outdoor living space) would receive. The colours generated show the areas where less than 3hours of direct sunlight (coloured blue and some yellow). The plug-in also exports an excel spreadsheet which lists the number of sunlight hours each grid intersection receives which makes it possible to determine the amount of sunlight received.

Using this information it was then possible to quantify the total change resulting from the rule change.

B. PROPOSED HEIGHT SCENARIO



With an increase in the maximum height limit to 12m, the average number of sunshine hours received on the grid would reduce to **7481.82 hours**. This is a **8%** decrease on the number of hours of sunlight received.

1. INDICATIVE 3D MODEL



2. SHADING ANALYSIS PLAN 1:750 @ A3

NOTE:

Buildings are indicative only and do not take into account site coverage or other restrictions such as service areas or on-site carparking.

CLIENT/Project name: TAUPO DISTRICT COUNCIL / Sunshine Analysis
 Drawing name: **SUNSHINE ANALYSIS LOCATION A - ROBERTS ST**
 Designed by: DAVE COMPTON-MOEN
 Drawn by: DAVE COMPTON-MOEN
 Original issue date: 28 JULY 2022
 Scales: NTS

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Project no / drawing no: 2022_135 / 002

Revision:B

B LOCATION B - RUAPEHU STREET

B. CURRENT HEIGHT SCENARIO

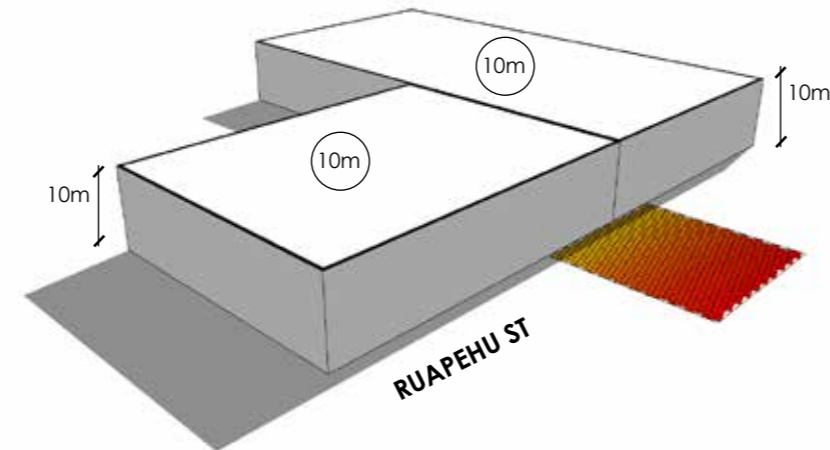
A. 'SUN-HOURS' METHODOLOGY

The coloured grids shown on these drawings represent a 20x20m area, used to show a representative change resulting from changes to the permitted maximum height limit.

The effects on the total number of sun hours received were then assessed for each scenario using a Sketchup plug-in called 'Sun Hours'. The plug-in uses the geo-referenced model and shadow tool in SketchUp to calculate the number of sunshine hours each 0.25m² grid square (0.5m x 0.5m) of a rear yard (assumed to be the outdoor living space) would receive. The colours generated show the areas where less than 3hours of direct sunlight (coloured blue and some yellow). The plug-in also exports an excel spreadsheet which lists the number of sunlight hours each grid intersection receives which makes it possible to determine the amount of sunlight received.

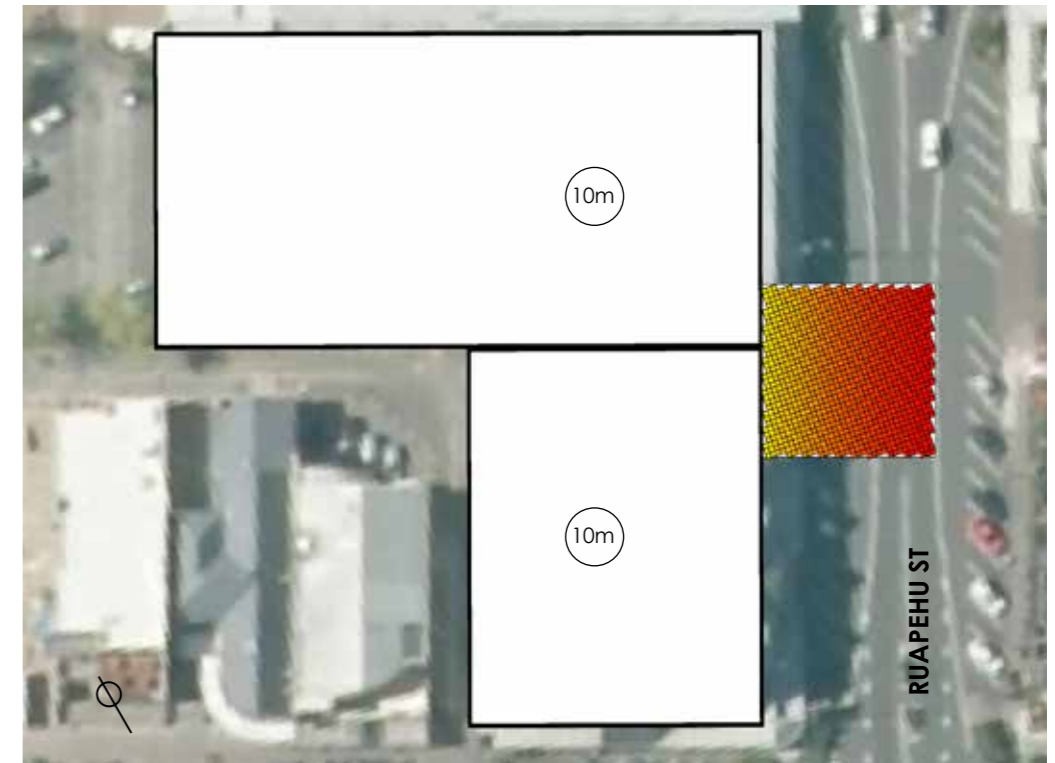
Using this information it was then possible to quantify the total change resulting from the rule change.

NOTE:
Buildings are indicative only and do not take into account site coverage or other restrictions such as service areas or on-site carparking.



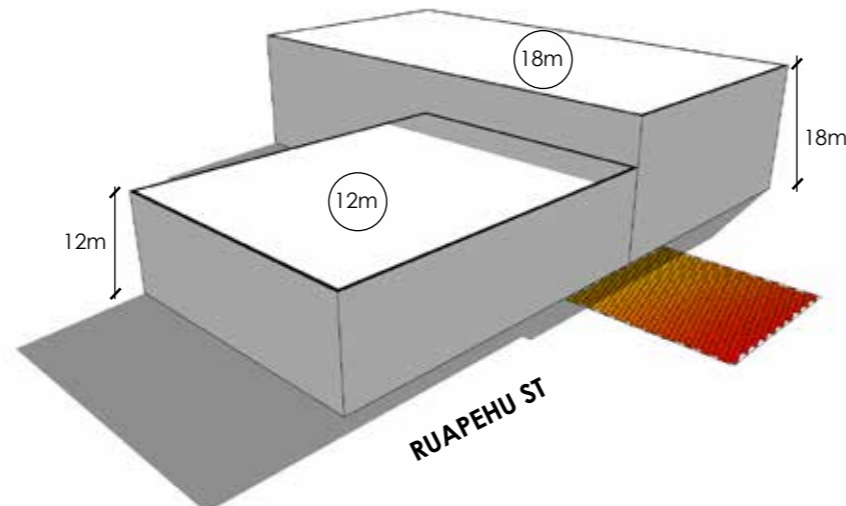
The theoretical average number of sunshine hours received on a 20x20m area of Ruapehu Street, with a 10m maximum height limit is **9558.10 hours**. Note that this does not take into account weather conditions or wider typographical features and is simply based on a simple 'bulk and location' model.

1. INDICATIVE 3D MODEL



2. SHADING ANALYSIS PLAN 1:750 @ A3

C. PROPOSED HEIGHT SCENARIO



With an increase in the maximum height limit to 12m and 18m, the average number of sunshine hours received on the grid would reduce to **8072.31 hours**. This is a **16%** decrease on the number of hours of sunlight received.

1. INDICATIVE 3D MODEL



2. SHADING ANALYSIS PLAN 1:750 @ A3

CLIENT/Project name: TAUPO DISTRICT COUNCIL / Sunshine Analysis
 Drawing name: **SUNSHINE ANALYSIS LOCATION B - RUAPEHU ST**
 Designed by: DAVE COMPTON-MOEN
 Drawn by: DAVE COMPTON-MOEN
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Revision no:	Amendment:	Approved	Date
A	Draft Issue for comment	DCM	28.06.2022
B	Final	DCM	28.07.2022



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Project no / drawing no: 2022_135 / 003

Revision:B

APPENDIX C - SIGNIFICANCE OF THE EFFECTS

Pursuant to section 32(1)(c), an evaluation report must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal (section 32(1)(c)). This means that the scale and significance of the effects of the Proposal is the key factor influencing the level of detail required for a section 32 evaluation.

Considerations and criteria for determining scale and significance		Ranking High/Medium/Low
1. Reasons for the change	<p><i>Building Height</i></p> <p>Increasing the building height from three (3) storeys to 12m and 18m as shown within the Spatial Overlays reflects the reality of demand for increased building height and intensification in the core part of the Taupō Town Centre. It enables optimising use of each respective business site and encourages redevelopment and assessment.</p>	<ul style="list-style-type: none"> • Medium
	<p><i>Temporary Activities</i></p> <p>Reflects the actual use and frequency of Tongariro Domain for hosting events and Temporary activities.</p>	<ul style="list-style-type: none"> • Low
2. Degree of shift from the status quo (status quo defined as the current approach)	<p><i>Building Height</i></p> <p>A material gain in potential height, but not at a scale that is substantially different from the receiving environment. Urban Design controls are provided to ensure context and design is accounted for.</p>	<ul style="list-style-type: none"> • Low - Medium
	<p><i>Temporary Activities</i></p> <p>Effectively a doubling of permitted activities.</p>	<ul style="list-style-type: none"> • Medium
3.Environmental effects	<p><i>Building Height</i></p> <p>There will be observable changes in building bulk and prominence, as well as minor changes in character. Urban Design controls are provided to ensure context and design is accounted for.</p>	<ul style="list-style-type: none"> • Low - Medium
	<p>Will be an increase in events (and potential noise and disruption) compared to the permitted Operative Plan provisions, however not the actual number of events being undertaken.</p>	<ul style="list-style-type: none"> • Low - Medium

4. Economic effects	<i>Building Height</i> Substantial economic benefits to individual landowners, an increase in commercial diversity and agglomeration benefits associated with the Town Centre environment (vitality and reinvestment) in terms of wider community economic benefits.	• Medium
	<i>Temporary Activities</i> Substantial economic wellbeing benefits to the wider community from hosting events (including indirect benefits)	• High
5. Cultural effects	Neither aspect of the Proposed Plan Change will result in material cultural costs.	• Low – Negligible
6. Social effects	<i>Building Height</i> Increase vitality in terms of wider community social benefits.	• Low
	<i>Temporary Activities</i> District is able to support a wide range of temporary activities and events which will facilitate and enable social wellbeing within the District.	• High
7. Who and how many will be affected?	<i>Building Height</i> Any landowner or occupier in that area subject to the Height Overlays.	• Low – Medium
	<i>Temporary Activities</i> Community as a whole and those that reside proximate to Tongariro Domain.	• Medium
8. Degree of impact on, or interest from iwi/Māori	Neither aspect of the Proposed Plan Change will result in material impacts on iwi/Māori values.	• Low – Negligible