Proposed Plan Change 36 To Taupō District Plan:

Summary of Decisions Requested by Submitters

Submitter Number: 1 Submitter: Rob & Deborah Ewen

Point Number 1.1 Category 18-Non RMA issues

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: When my parents (W A & J E Ewen) purchased the first section at the

original auction at Whareroa they were assured by the Vendors that there would be no further subdivisions or developments north west of the river. To go ahead with a further development now is a potential breach of that implied

covenant.

Point Number 1.2 Category 14-Infrastructure

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We are concerned at the added pressure new housing would place on

facilities.

Point Number 1.3 Category 16-Environment

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We are concerned at any adverse impact on the quality of the lake and

stream.

Point Number 1.4 Category 16-Environment

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We are concerned at the impact access roading etc will have on the pristine

environment.

Submitter Number: 2 Submitter: **Edward Lawton Point Number** 2.1 Category 14-Infrastructure Support/Oppose/Neutral: Oppose Retained/Deleted/Amended: Deleted Comments: It has its own sewerage - and water. Risk to stream if flooded. The road is not wide for this increase of sewerage. Could flood the stream. To many cars. **Point Number** 2.2 Category 18-Non RMA issues Support/Oppose/Neutral: Oppose Retained/Deleted/Amended: Deleted Comments: More campervans. Freedom campers

Submitter Number: 3 Submitter: Raenea Lawton

Point Number 3.1 Category 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: In 1996 our purchased land was part of stage 4. Since then stage 5,6 and 7

have been developed, the into and leaving Whareroa settlement remains the

same. The existing roading is not adequate for further usage.

A second road is needed to accommodate the further increase of 160 sections. Together with the existing 22 sections. A further road could be done in the stage 6 development to up behind the tennis courts and then

adjoining Whareroa Rd out of the Whareroa settlement.

Submitter Number:4Submitter:Stephen Sanderson

Point Number 4.1 **Category** 17-General

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: I have always been of the understanding since I purchased my section in

1987 that the area known as Whareroa North would be the final stage in the development of the Village, making the total size of the Village around 350 properties. As I understand the Whareroa water supply and sewage plant

was initially constructed with this in mind.

What I can't understand is why the Council is now putting the applicants to this expense when Council has known all along this was part of future development of Whareroa and would require to be zoned residential. I would have thought that when they did the Structure plan which became operative in 2013 this would have been part of that plan. My belief is, it should have been flagged and zoned Residential by the Council and included in the

Taupo District structures plan review.

Point Number 4.2 Category 11-Access to site

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: The only concerns that I have is with the access to the land. I have in the

past raised this with the developers. I know that the developers have looked at and discussed alternative access and concluded the option across the stream closest to the lake is the best and preferred option. I have been assured and accept that all care will be taken to protect both stream and the bush covered area, and, that the area required for the road and bridge will

have the bare minimum disturbance to the bush and hillside.

Submitter Number: 5 **Submitter:** Maggie Stewart

Point Number 5.1 **Category** 17-General

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: I have been following the proposal for many years and think it has been well

thought out and will add another dimension to people wanting to live at the

southern end of the lake

Submitter Number: 6 **Submitter:** Desarie Drayton

On behalf of: Campbell Harding, Rodney McCoubrie, Angela McCoubrie

Point Number 6.1 **Category** 2-Section 3a: Policy 3a.2.1v

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We also don't agree with the inclusion of the word 'generally' in the above

policy. It allows too much discretion. If future development is allowed, it

should have to be 'in accordance with' the development plan.

Point Number 6.2 Category 4-Section 3a: 3a.5 vi

Anticipated Environmental

Outcomes

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We oppose the proposed rezoning and development of the Residential

Environment at Whareroa North. If it is allowed, we think that any

development should have to be in accordance with the development plan,

not 'generally'.

Point Number 6.3 **Category** 5-Section 4a: 4a.3.1A

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We oppose the rezoning for reasons previously stated, but if it is allowed to

go ahead, we would like the word 'generally' to be removed, and we would like future subdivision to have an activity status that is more restrictive than

controlled, and Council to be required to notify us.

Point Number 6.4 **Category** 6-Section 4a:4a.3.1B

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: Activity status should be more restrictive in line with previous comments.

Point Number 6.5 **Category** 17-General

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We oppose this area being rezoned Residential Environment

Point Number 6.6 Category 14-Infrastructure

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We think that the proposed development plan provides for too many new

sections to be created. There has been no consideration of the impact upon the community infrastructure and facilities, such as the boat ramp, the lake

foreshore, or the safety of Whareroa Road. The addition of up to 160

additional dwellings will double the pressure and demand upon the lakefront, jetty and boat ramp. Whareroa Road is narrow and winding with no kerb and

channel, which already creates safety issues as it is used by vehicles,

cyclists and pedestrians.

Point Number 6.7 **Category** 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The proposed position of the access road will have a significant impact upon

two of the parties included in this submission, as it will greatly increase the traffic in the vicinity of their houses, impacting upon their existing amenity

and enjoyment of their properties.

Point Number 6.8 Category 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: This river is also a major trout spawning river and we are concerned about

the impact of constructing the bridge on this. We would prefer that the access

to the marae was used if the development is allowed.

Point Number 6.9 Category 14-Infrastructure

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We oppose the proposed rezoning as 160 new sections will have a huge

impact upon the village and the community facilities and roading.

Submitter Number: 7 Submitter: Dr Ruth & Simon Ewen

Point Number 7.1 Category 14-Infrastructure

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The application states existing waste water facilities will be used. The Taupo

District Council Asset management plan wastewater 2018 states in appendix L re Whareroa scheme that 'The Whareroa north development comprising of

170 potential lots is being proposed, which will require a wastewater

treatment facility' i.e. in addition to the existing facility.

When all the dwellings at Whareroa are occupied the current sewerage ponds get full and are very odorous. We are very concerned if the facility is shared with a new subdivision the potential for spillage into our pristine stream and lake is very high causing degradation of the environment.

Point Number 7.2 Category 14-Infrastructure

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The extra traffic coming into the village is a health and safety risk for village

residents, particularly the children who regularly cycle and walk on the road

Point Number 7.3 Category 18-Non RMA issues

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: My parents purchased one of the first sections in the village years ago and in

the covenants was written no further development would occur. Another subdivision would be a breach of this. The attraction of the village, and why many residents purchased sections in good will from the original Maori trust

owners, is the relatively small unspoilt nature of the subdivision.

Point Number 7.4 **Category** 18-Non RMA issues

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We would like to point out that one of the Whareroa residents has a conflict

of interests being an employee of Baileys real estate and stands to benefit

from commission on sale of sections

Point Number 7.5 Category 9-Geotech

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: Where the proposed road up to the subdivision is planned is likely unstable

ground with evidence of many slips

Point Number 7.6 **Category** 18-Non RMA issues

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: Another 170 residences would place huge pressure on the one boat ramp.

Submitter Number: 8 Submitter: Hokowhituatu Duncan Cormac McKenzie **Point Number** 8.1 Category 2-Section 3a: Policy 3a.2.1v Support/Oppose/Neutral: Support Retained/Deleted/Amended: Retained Comments: Support the Plan Change provisions in full for the reasons set out in the application **Point Number** 3-Section 3a: 3a.2.1 8.2 Category **Explanation Support/Oppose/Neutral:** Support Retained/Deleted/Amended: Retained Comments: Support the Plan Change provisions in full for the reasons set out in the application **Point Number** 4-Section 3a: 3a.5 vi 8.3 Category Anticipated Environmental Outcomes Support/Oppose/Neutral: Support Retained/Deleted/Amended: Retained Comments: Support the Plan Change provisions in full for the reasons set out in the application **Point Number** 8.4 Category 5-Section 4a: 4a.3.1A Support/Oppose/Neutral: Support Retained/Deleted/Amended: Retained Comments: Support the Plan Change provisions in full for the reasons set out in the application **Point Number** 8.5 6-Section 4a:4a.3.1B Category **Support/Oppose/Neutral:** Support

Retained/Deleted/Amended: Retained

Comments: Support the Plan Change provisions in full for the reasons set out in the

application

Point Number 8.6 Category 7-Appendix 8

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: Support the Plan Change provisions in full for the reasons set out in the

application

Point Number 8.7 **Category** 17-General

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: Support the Plan Change provisions in full for the reasons set out in the

application.

Submitter Number: 9 **Submitter:** lan Sutcliffe

Point Number 9.1 Category 12-Impacts on the

significant natural areas and

landscape

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The extent of land proposed to be rezoned and the related access to the

land across Whareroa Stream will result in unacceptable and

inappropriate adverse environmental effects on the ecology, and natural

characteristics of the environment.

Point Number 9.2 **Category** 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The development intended would be better served by access via the land

to the south, from State Highway 32; The location and alignment for the proposed road connecting Whareroa North to Whareroa village has not been sufficiently analysed as to the effects on the amenity of the existing

village, and the resultant traffic implications.

Point Number 9.3 Category 12-Impacts on the significant natural areas and

landscape

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The extent to which the development requires removal of native vegetation

and the reliance on mitigation is yet to be identified.

Point Number 9.4 **Category** 14-Infrastructure

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The proposal contains insufficient information outlining the capacity and

capability of using the existing sewage system for Whareroa North.

Point Number 9.5 **Category** 8-Residential demand

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: It is incumbent on the applicant to demonstrate through this plan change

process that the effects generated can be satisfactorily mitigated and that there are suitable triggers and thresholds in place for when such mitigation

will occur; who will be responsible for it and that there will be no corresponding costs to the ratepayers of Whareroa village.

Point Number 9.6 **Category** 17-General

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: We find that there is insufficient information contained in the application to

be conclusive as to the effects of the proposed zoning changes to land

use, notably:

1. The Geotech is reliant on future analysis;

2. The location and alignment for the road connecting Whareroa North to Whareroa village has not been sufficiently analysed as to the capacity to

accommodate the proposed intensification;

3. The extent to which the development requires removal of native vegetation and the reliance on mitigation is yet to be identified; and

4. There is insufficient information outlining the capacity and capability of

using the existing sewage system for Whareroa North.

Point Number 9.7 Category 9-Geotech

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The proposal contains insufficient information concerning the potential

geotechnical effects to confirm or otherwise that the land on which the proposal is intended is stable, and will not result in land slip or subsidence, which in turn will adversely implicate the ecology of the Whareroa Stream.

Point Number 9.8 Category 8-Residential demand

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: After reading the Economic Cost Benefit Report, I cannot support a

submission that requires incremental funding from existing ratepayers to fund

the planned development which has no apparent up-side to the village.

Submitter Number: 10 Submitter: Cory Skipper

On behalf of: The whanau

Point Number 10.1 Category 12-Impacts on the

significant natural areas and

landscape

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: I oppose the plan because of the impact it will have on the immediate and

surrounding environment. Such development would be detrimental to the habitat of many endemic creatures of New Zealand . The native trees and shrubs are very necessary to the birds and many other creatures and to make separate Whareroa village to Poukura Marae. If the Whareroa block was to become residential it would be a major negative impact on many many Levels. It does not belong there. The land and bush is very special we need to look after what little we have left. These are but a few reasons why I

oppose the plan.

Submitter Number: 11 Submitter: Kia Paranihi

Point Number 11.1 Category 17-General

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: The "Southern Settlements Structure Plan" (SSSP) was adopted by Taupo

District Council (TDC) in May 2013 and provides for the northside

development at Whareroa. The SSSP clarifies that TDC will not undertake the rezoning process but instead private landowners will determine when the market is ready and their investment in that process should be made. The Proprietors of Hauhungaroa No 6 have accepted that directive and embarked

on a Private Plan Change process to secure the appropriate District.

(Application to Change the Taupo District Plan Pursuant to Section 73(2) of

the Resource Management Act 1991)

Point Number 11.2 Category 15-Maori values

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: The owners and trustees are tangata whenua of the land and they

themselves are Ngati Parekaawa o Poukura and have a presence on

Poukura Marae.

The proposed Plan Change as presented in the application retains the

relationship of Ngati Parekaawa to our culture and traditions

around ancestral lands, water, sites, waahi tapu and other taonga.

Point Number 11.3 Category 9-Geotech

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: Outcomes of hapu hui have largely been worries about a raw scarp area

> above the stream which erodes at times of medium to heavy rainfall and also, the structure and placement of the bridge crossing of the stream.

The scarp can erode, resulting in silt and pumice sand slipping into the stream and causing change to its outfall and nature. At the lakeside crossing of the stream it is possible cross it at ankle depth one day and above knee depth the next. This is a shock if you are unaware and there was a concern

that the problem would increase with the development. While we

acknowledge that this is a naturally and regularly occurring event every now and then given the pumice nature of the lakeside soil structure, we conveyed to the development consultants our wish to have this minimised to achieve stabilisation of the land as we are not far away. The developers response as outlined in the application is more than satisfactory and we are assured of

ongoing consultation on the matter.

Point Number 11.4 Category 11-Access to site

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: The bridge was the other concern raised. Not being engineers, we

> considered this to represent quite a feat of creative engineering imagination to achieve stream crossing in an environment of surrounding unstable earth

that is common around the lake.

The Trust Board has specifications for bridges built close to the lake which are acceptable to Tuwharetoa and we are informed that there is an

agreement in principle from the Tuwharetoa Maori Trust Board to the bridging of the Whareroa Stream. Ngati Parekaawa is confident of the bridge

being being appropriately designed, constructed and placed to our

satisfaction.

Point Number 11.5 **Category** 15-Maori values

Support/Oppose/Neutral: Support

Retained/Deleted/Amended: Retained

Comments: Since the late 1950s, Whareroa owners have thought about and planned for

a residential development at Whareroa. Over the years, there has been consultation with the Council and other relevant bodies to achieve this as they have positively engaged in staged aspects of council planning which has not been as consistent as the owners intentions and activities.

Whareroa owners have given over large tracts of lakeside land for public use as reserves in order to both assist the process of development and contribute to the health of Ngati Tuwharetoa taonga waters, Te Kopu a Kanapanapa,

The glistening belly (of the motu), Lake Taupo.

Not enough can be said about the land swaps for and gifting of lakeside real

estate and the value of it to the nation.

Submitter Number: 12 Submitter: Michael Ewen

Point Number 12.1 Category 17-General

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: My brother Robert F Ewen has submitted his submission opposing the entire

submission. I support his submissions and am totally opposed to the

proposal.

Submitter Number: 13 Submitter: Robert & Jo Colman **Point Number** 13.1 Category 8-Residential demand Support/Oppose/Neutral: Oppose Retained/Deleted/Amended: Deleted Comments: Population growth in the Taupo area is in Taupo itself. The area of Whareroa, for the years 2013 to 2018, indicates very clearly a deficit in population growth **Point Number** 13.2 Category 12-Impacts on the significant natural areas and landscape Support/Oppose/Neutral: Oppose Retained/Deleted/Amended: Deleted Comments: The existing users of the Whareroa village have chosen the area for the word 'village'. It is an area with minimal population, it is an area with a community spirit. It comes with native bush and birdlife as its neighbours. If we wanted to live in developed areas such as Taupo or the Coromandel then we would live there. Developments such as the proposed will impact hugely on the area's existing character and not in a positive manner. Whareroa is special, it is an area of outstanding natural beauty, we urge that it be left as is. **Point Number** 13.3 Category 8-Residential demand Support/Oppose/Neutral: Oppose Retained/Deleted/Amended: Deleted Comments: Ratepayers will be left to fund community changes yet the community is very small and based upon growth figures the growth is stagnant **Point Number** 13.4 14-Infrastructure Category Support/Oppose/Neutral: Oppose Retained/Deleted/Amended: Deleted Comments: Current services such as the waste water already struggle to cope in the summer months

Point Number 13.5 Category 18-Non RMA issues

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments:

The only people who will benefit from this proposal is those who sell the land. It has come to our attention that a local real estate agent has commented 'I speak on behalf of all Whareroa residents in supporting this

development'. This is incorrect.

Point Number 13.6 Category 9-Geotech

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The land to which a bridge is proposed to be built upon is very unstable.

Point Number 13.7 Category 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: The stream that the proposed bridge is to cover is a spawning stream for

brown trout.

Point Number 13.8 Category 8-Residential demand

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

Comments: Around the lake there are numerous vacant lots, around 5,700 in fact, with

more than enough available to cope with projected growth in both medium and high growth areas. Whareroa is not in either of these categories.

It is clear the servicing of new residential sites is unnecessary, is not based on housing needs, and a proposal such as this is completely out of line with the expected growth in the area as outlined in the 'Whareroa North Economic

Cost Benefit Assessment, Nov 2019'.

Submitter Number:	14	Submitter:	Michael Townson Miller
Point Number	14.1	Category	12-Impacts on the significant natural areas and landscape
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	Fragile ecological area.		
Point Number	14.2	Category	9-Geotech
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	Unstable geological area.		
Point Number	14.3	Category	14-Infrastructure
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	Overcrowding of Whareroa fa pressure on infrastructure.	acilities. Increased	road traffic. Increased
Point Number	14.4	Category	14-Infrastructure
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	If it goes ahead where would road access be? Sewerage plant, Water supply?		

Submitter Number: 15 Submitter: Alec Duncan

On behalf of: Ministry of Education Organisation: Beca Ltd

Point Number 15.1 Category 14-Infrastructure

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: Consideration of the need for safe transport routes and access to and from

schools including infrastructure to support the schools will need to be taken into account. This is to ensure that TDC provide a transport network that is accessible and safe as development of this settlement progresses in order to

meet their objective under TD2050.

The Ministry also requests that TDC and the Applicant engage early with the Ministry in terms of the staging and timeline of this development to keep them up to date on this plan change to help understand the potential impact on the school network and associated school sites. the Ministry is concerned about the implications for schooling provision, which are likely to arise from significant residential development and growth. Given the current rural nature of Whareroa North, the Ministry has not anticipated substantial residential development (i.e., an additional 160 dwellings) in the southern settlements of the Taupo District, including Whareroa.

There is one school (Kuratau School) located approximately 9km from the development site. The next schools are located in Turangi - approximately 30min drive from Whareroa. These local schools are limited in their capacity and additional development over and above that already provided for under the current rural zoning and in accordance with the Ministry's current network strategy may result in negative outcomes for the future Whareroa North community.

Submitter Number: 16 **Submitter:** Carolyn McAlley

Organisation: Heritage New Zealand Pouhere Taonga

Point Number 16.1 Category 10-Historic heritage

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: A new archaeological assessment is undertaken The Resource Management

Act requires that the protection of historic heritage should be recognised and

provided for as a Matter of National Importance (Section 6(f). As the

earthworks have the potential to destroy historic heritage, it is important that

before the subdivision design is finalised that a new archaeological

assessment is undertaken to inform the subdivision design to ensure that any future any earthworks do not adversely affect archaeology.

Point Number 16.2 Category 10-Historic heritage

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: New archaeological assessment should be provided The Plan Change

application has included an Archaeological Survey and Assessment of Effects, prepared for Proprietors Hauhungaroa No 6 by Don Prince, August 2005. This is discussed in the Assessment of Effects for Plan Change 36 1, however this assessment is considered inadequate for the purposes of informing the Plan Change in relation to archaeology for the following

reasons:

• The archaeological assessment is dated 2005, making it at least 14 years old. The subject site may have changed since that time and therefore reassessment is required. The new archaeological assessment should include a direct response to proposed Plan Change 36, including the mitigation package outlined in the Plan Change application, which includes replanting, and also the walkways through indigenous vegetation. 2

• The application includes a Cultural Impact Assessment-Whareroa North Structure Plan and Whareroa Bridge Crossing, from Tina Porou Consultants Limited, 2008, Authored by: Tina Porou. This assessment has indicated 3 that a review of the 2005 archaeological assessment was part of the process for preparing the Cultural Impact Assessment report. Therefore a revised archaeological assessment should be provided to the applicant to inform the Cultural Impact assessment as required.

Point Number 16.3 Category 10-Historic heritage

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: A new archaeological assessment must clearly relate to Plan Change 36

HNZPT requires clarification regarding the area of the assessment, as the copy of this assessment has been provided in a black and white copy that does not show the "red" in Figure 14 that was the area of study, therefore HNZPT is unclear if the area of study relates to the area proposed for the Plan Change 36. In the reassessment the study area must clearly relate to

Plan Change 36.

Point Number 16.4 **Category** 10-Historic heritage

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: If the bush block area is to be developed at any stage HNZPT recommends

that appropriate vegetation clearance and archaeological inspection occur as part of the archaeological reassessment. The assessment clearly advises that areas within the assessment area had "ground surface visibility that ranged from good (pasture block) to restrictive (bush block)" 5. The Recommendation section 6 advises that "following vegetation clearance in

the bush block and prior to the commencement of earthworks an

archaeologist inspects the area so as to determine whether archaeological deposits exist". If the bush block area is to be developed at any stage

HNZPT recommends that appropriate vegetation clearance and

archaeological inspection occur as part of the archaeological reassessment.

Point Number 16.5 **Category** 10-Historic heritage

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Amended

Comments: A new archaeological assessment is required We consider that for the

purposes of an assessment against s6 (f) of the RMA archaeological matters have not been sufficiently assessed, therefore HNZPT cannot support the conclusion in the Assessment of Effects that Historic Heritage will not be

adversely impacted.

Submitter Number: 17 **Submitter:** Michelle Flay

Organisation: Waikato Regional Council

Point Number 17.1 Category 8-Residential demand

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Amended

Comments: The proposal to develop Whareroa North is not supported until further

evidence confirms there is sufficient demand to support additional urban land within the Taupo district at this time, so as to not compromise

coordinated and strategic growth within the Taupo District.

The timing of rezoning this growth area will have implications beyond the Whareroa locality for infrastructure funding and the land supply of vacant

land. Therefore, further rezoning within the Taupo district should be

considered through a district- wide lens.

Policy 6A Development Principles refers to new development and states:

- (a) support existing urban areas in preference to creating new ones;
- (c) make use of opportunities for urban intensification and redevelopment to minimize the need for urban development in greenfield areas

Further information is required to justify the proposal is consistent with the WRPS and will not compromise the existing Taupo district urban land supply.

Point Number 17.2 Category 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Amended

Comments:

The development is contingent on road access therefore options should be proposed and considered through this private plan change application. Providing policy direction at the outset of the development would be preferable to relying on a staged resource consent process and would enable a coordinated approach to biodiversity offsetting for the development as a whole.

Given the potential impact the access will have on the SNA, ONF and the Whareroa Stream it would be preferable that alternative access route options are investigated, including access from the north of Whareroa Stream. There are already small pockets of residential development, and forestry roads located to the north of the subject site which have not been presented as alternative options. These options should be considered as alternatives.

WRPS Policy 6.1 requires that subdivision, use and development of the built environment, including transport, occurs in a planned and coordinated manner which has regard to the principles in section 6A. New development should be directed away from natural hazard areas (6A(h)) and should promote positive indigenous biodiversity outcomes and protect significant indigenous vegetation and significant habitats of indigenous fauna (6A(k)). The indicative access does not fulfil either of these principles.

The principles in section 6A are not absolutes and it is recognised that in some cases, certain principles may need to be traded off against others. The RPS notes that 'It is important however, that all principles are appropriately considered when councils are managing the built environment.'

Consideration of the practicalities of accessing the proposed subdivision should form part of the planned and coordinated plan change process. Given the subdivision is contingent on road access it would be inappropriate to not consider the access options via this plan change, rather than a resource consent.

The applicant has not demonstrated that access can be provided to the proposed subdivision. An indicative route up the steep slope on the northern side of the Whareroa Stream has been provided, but this route does not currently form part of the plan change under consideration.

Point Number 17.3 Category 12-Impacts on the significant natural areas and

landscape

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Amended

Comments: Any further fragmentation or vegetation removal within the existing SNA

needs to be undertaken with due regard to ecological connections which exist beyond the subject site and 'At Risk' species that rely on functional corridors. Additional fragmentation of these connections must be avoided.

An assessment of the biodiversity of the subject site was included as part of the proposal. However, this assessment does not adequately consider the wider locality, in particular the possible ecological connections which exist along the western shores of lake Taupo and span towards Hauhangaroa Ranges to the west.

As outlined in the access section above, the indicative access route goes through a Taupo District Plan Significant Natural Area – SNA 062 Te Kokomiko Point, Poukara Pa Bush, Whareroa Stream (Figure 4). SNA 062 meets criterion 3 (habitat for threatened species) due to the presence of NZ falcon and long-tailed cuckoo. Long-tailed cuckoo (or koekoea), an 'At Risk' naturally uncommon endemic species, relies upon whitehead (popokatea), its 'At Risk' declining North Island host. Whitehead are found in the SNAs along the western shores of Taupo, particularly where strong connections exist to the Hauhangaroa Ranges to the west.

If formed, the access at this site would contribute to the cumulative fragmentation of the functional corridor that connects the bulk of this SNA to the western ranges. Clearance of the vegetation that forms this important habitat would be required. WRPS Development Principle 6A(k) states that new development should "promote positive indigenous biodiversity outcomes and protect significant indigenous vegetation and significant habitats of indigenous fauna".

Point Number 17.4 Category 12-Impacts on the significant natural areas and

landscape

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Amended

Comments: The development is contingent on road access therefore this should be

included in this private plan change application. The WRPS stipulates the requirement to avoid adverse effects on outstanding natural character. Alternative access options, such as access to the north of Whareroa Stream, may be more appropriately considered through the plan change process

rather than through a resource consent.

Additional information is required to be able to establish the scale of the effects anticipated as a result of the earthworks to create access to the

development.

WRPS Policy 12.2 ensures the natural character of lakes, rivers and their margins are preserved. Where natural character is deemed to be 'outstanding', the policy stipulates activities should avoid adverse effects on natural character. In the case of Whareroa the distinctive cliffs and elevation of the settlement offer spectacular views and a high level of uniqueness and

natural character.

The indicative access route would require removal of vegetation within the SNA and OLA and it is likely that earthworks would be required to substantially cut into the very steep slope on erodible pumice substrate. The existing erosion apparent on the slope, and the presence of underground hydrological features creates uncertainty as to the extent of the cut required and hence the scale of the impact this might have on the OLA.

The landscape assessment confirms that the road and the associated vegetation clearance across the plateau will be visible from the Whareroa

settlement and areas on Lake Taupo.

The WRPS requirement to avoid adverse effects on outstanding natural features would also suggest that alternative access routes be considered, particularly as there are existing dwellings and forestry tracks to the north of the proposed residential development.

Point Number 17.5 Category 11-Access to site

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: Amendments to the proposed application are sought to include the access

and bridge aspects of the development to ensure that potential hazards associated with the proposal are considered through the plan change process. WRPS Development Principles 6A(e) and (h) requires that new development connect well with existing and planned development and infrastructure and be directed away from natural hazard areas. Therefore, access to the proposed subdivision, and in particular, any constraints to access should form a key consideration in the plan change process.

WRC submits that the practicalities of accessing the proposed development should be assessed through the plan change process so that the indicative route up the steep slope on the northern side of the Whareroa Stream can be

given appropriate consideration.

Point Number 17.6 13-Natural Hazards Category

Support/Oppose/Neutral: Neutral

Retained/Deleted/Amended: Amended

Comments: Insufficient information has been provided in order to complete a thorough

assessment against the WRPS. WRC submits that additional geotechnical

investigation is required to fully understand the cause, extent and

subsequent implications this geological feature may have on the safety to future persons and property and on the design of the stormwater system.

The proposed development area contains a potential erosion feature, the 'bowl' that does not appear to have been sufficiently addressed in the geotechnical reporting. Housing is proposed within close proximity to the 'bowl' feature. However, information provided by the applicant is not sufficient to confirm whether or not the bowl comprises a primary hazard zone and therefore an intolerable risk.

WRPS Section 6A(h) directs new development away from natural hazards. In addition, WRPS Policy 13.1(c)states that the creation of new intolerable risk

is to be avoided. District Plans shall incorporate a risk-based approach into the management of subdivision, use and development in relation to natural hazards and shall ensure that new development is managed so that natural hazard risks do not exceed acceptable levels (Section 13.1.1(a)). An intolerable natural hazard risk is defined in the WRPS as 'risk which cannot be justified and risk reduction is essential e.g. residential housing being developed in a primary hazard zone'. A primary hazard zone is 'an area in which the risk to life, property or the environment from natural hazards is intolerable'.

The geotechnical reporting indicates the erosion and scouring is being caused by underground processes. However, the investigation was limited to publicly available information and a surface inspection. The limitations of this approach and the possibility of other problems being present were noted by the proponents consultant.

The 'bowl' feature, and escarpment substrate may also have implications for the design of stormwater infrastructure required to service the proposed development. The stormwater management systems will need to be designed to ensure post- development hydrology remains as close to predevelopment hydrology as possible. The stormwater management systems will also need to be designed to avoid or mitigate adverse effects on the receiving environment including the Whareroa Stream. Further information is therefore required, beyond the boundaries of the subdivision, to understand how the new development will meet the principles of WRPS 6A (e) and (h) to connect well with existing infrastructure and direct development away from hazard areas.

Point Number 17.7 Category 11-Access to site

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Amended

Comments:

Amendments to the proposed application are sought to include the integral roading and bridge aspects of the development. Should the access infringe upon the SNA and ONFL it may need to be addressed through policy direction e.g. biodiversity offsetting. WRPS Policy 6.1 c) requires that the development of the built environment is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development. This is supported by Method 6.1.8 b) which requires an appropriate level of information on the location, type, scale, funding and staging of infrastructure required to service the area.

A road and bridge across the Whareroa stream will be required to connect the proposed development to the existing Whareroa settlement. These works will encroach upon the Outstanding Landscape Area 60 (OLA60) and Significant Natural Area (SNA062) and will potentially have significant implications for these areas of high value and would require careful consideration.

WRPS Policy 11.2.2 requires that SNAs are protected and that activities avoid loss in preference to remediation or mitigation. The WRPS then considers employing a hierarchy of remediation, mitigation and then applying biodiversity offsets for residual adverse effects that cannot be avoided, remedied or mitigated. It would be useful to know and understand as part of the plan change process how and where within the applicant's site adverse effects on SNAs are to be avoided, and how and where to employ mitigation and offsetting measures.

It is important that the impacts on the high value local ecology and outstanding landscape are considered alongside the other merits of the proposed plan change.