

Attachment C: Proposed Plan Change 36 To Taupo District Plan:

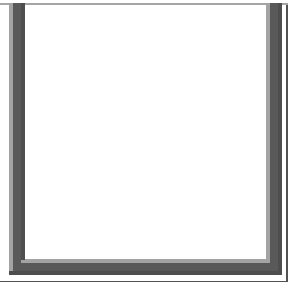
Summary of Decisions Requested by Submitters

Submitter Number: 1		Submitter: Rob & Deborah Ewen		Recommendation
Point Number	1.1	Category	18-Non RMA issues	Reject
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	Accept in part
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	Reject
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	Accept
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	Recommendation
Point Number	2.1	Category	14-Infrastructure	Reject
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Deleted			
Comments:	<p>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.</p>			
Point Number	2.2	Category	18-Non RMA issues	Reject
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Deleted			
Comments:	<p>More campervans. Freedom campers</p>			

Submitter Number:	3	Submitter:	Raenea Lawton	Recommendation
Point Number	3.1	Category	11-Access to site	Reject
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Deleted			
Comments:	<p>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.</p> <p>A second road is needed to accommodate the further</p>			

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:	6	Submitter:	Desarie Drayton	Recommendation
On behalf of:	Campbell Harding, Rodney McCoubrie, Angela McCoubrie			
Point Number	6.1	Category	2-Section 3a: Policy 3a.2.1v	Accept
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	Accept
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.

Accept

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.

Accept

Point Number 6.5 **Category** 17-General
Support/Oppose/Neutral: Oppose
Retained/Deleted/Amended: Deleted
Comments: We oppose this area being rezoned Residential Environment

Accept

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.

Accept in part

Point Number	6.7	Category	11-Access to site	Reject
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.			
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Point Number	6.8	Category	11-Access to site	Accept in part
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.			
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Point Number	6.9	Category	14-Infrastructure	Reject
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.			
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Submitter Number:	7	Submitter:	Dr Ruth & Simon Ewen	Recommendation
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Point Number	7.1	Category	14-Infrastructure	Reject
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

Reject

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.

Reject

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

Reject

Point Number	7.5	Category	9-Geotech	Accept in part
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			
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Point Number	7.6	Category	18-Non RMA issues	Reject
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Deleted			
Comments:	Another 170 residences would place huge pressure on the one boat ramp.			
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Submitter Number:	8	Submitter:	Hokowhituatu Duncan Cormac McKenzie	Recommendation
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Point Number	8.1	Category	2-Section 3a: Policy 3a.2.1v	Reject
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	Support the Plan Change provisions in full for the reasons set out in the application			
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Point Number	8.2	Category	3-Section 3a: 3a.2.1 Explanation	Reject
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	Support the Plan Change provisions in full for the reasons set out in the application			
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Point Number	8.3	Category	4-Section 3a: 3a.5 vi Anticipated Environmental Outcomes	Reject
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	Reject
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	Category	6-Section 4a:4a.3.1B	Reject
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	Reject
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	Reject
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	Support the Plan Change provisions in full for the reasons set out in the application.			

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Submitter Number:	9	Submitter:	Ian Sutcliffe	Recommendation
Point Number	9.1	Category	12-Impacts on the significant natural areas and landscape	Reject
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.

Reject

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.

Accept

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.

Reject

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.

Accept in part

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.

Accept

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.

Accept

Point Number 9.8 **Category** 8-Residential demand

Support/Oppose/Neutral: Oppose

Retained/Deleted/Amended: Deleted

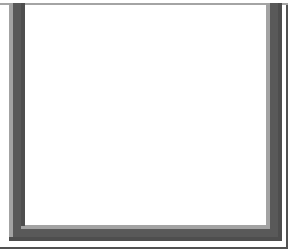
Comments: After reading the Economic Cost Benefit Report, I cannot support a submission that requires incremental funding from existing ratepayers to fund the planned development which has no apparent up-side to the village.

Accept

Submitter Number:	10	Submitter:	Cory Skipper	Recommendation
On behalf of:	The whanau			Accept
Point Number	10.1	Category	12-Impacts on the significant natural areas and landscape	
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Deleted			
Comments:	<p>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.</p>			

Submitter Number:	11	Submitter:	Kia Paranihi	Recommendation
Point Number	11.1	Category	17-General	Reject
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	<p>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</p>			

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	Accept
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	<p>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.</p> <p>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.</p>			
Point Number	11.3	Category	9-Geotech	Accept in part
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	<p>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.</p> <p>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.</p>			
Point Number	11.4	Category	11-Access to site	Reject
Support/Oppose/Neutral:	Support			
Retained/Deleted/Amended:	Retained			
Comments:	<p>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</p>			

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.

Accept

Submitter Number: 12 **Submitter:** Michael Ewen

Recommendation

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

Accept

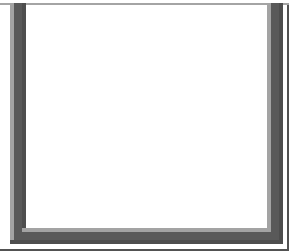
his submissions and am totally opposed to the proposal.



			Recommendation
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		Accept
Point Number	13.2	Category	12-Impacts on the significant natural areas and landscape
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	<p>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.</p> <p>Whareroa is special, it is an area of outstanding natural beauty, we urge that it be left as is.</p>		Accept
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		Accept
Point Number	13.4	Category	14-Infrastructure
Support/Oppose/Neutral:	Oppose		
			Reject

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	Reject
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	Accept in part
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	Accept in part
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	Accept
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Deleted			
Comments:	<p>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.</p> <p>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' .</p>			



			Recommendation
Submitter Number:	14	Submitter: Michael Townson Miller	
Point Number	14.1	Category 12-Impacts on the significant natural areas and landscape	Accept
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	Fragile ecological area.		
Point Number	14.2	Category 9-Geotech	Accept
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	Unstable geological area.		
Point Number	14.3	Category 14-Infrastructure	Accept
Support/Oppose/Neutral:	Oppose		
Retained/Deleted/Amended:	Deleted		
Comments:	Overcrowding of Whareroa facilities. Increased road traffic. Increased pressure on infrastructure.		
Point Number	14.4	Category 14-Infrastructure	Reject
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	Recommendation
On behalf of:	Ministry of Education	Organisation:	Beca Ltd	Accept in part
Point Number	15.1	Category	14-Infrastructure	
Support/Oppose/Neutral:	Neutral			
Retained/Deleted/Amended:	Amended			
Comments:	<p>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.</p> <p>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.</p> <p>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.</p>			

Submitter Number:	16	Submitter:	Carolyn McAlley	Recommendation
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.

Accept in part

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.

Accept in part

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.

Accept in part

Point Number	16.4	Category	10-Historic heritage	Accept
Support/Oppose/Neutral:	Neutral			
Retained/Deleted/Amended:	Amended			
Comments:	<p>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.</p>			
Point Number	16.5	Category	10-Historic heritage	Accept
Support/Oppose/Neutral:	Oppose			
Retained/Deleted/Amended:	Amended			
Comments:	<p>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.</p>			

Submitter Number:	17	Submitter:	Michelle Flay	Recommendation
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.

Accept

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

Accept in part

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".

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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

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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

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the steep slope on the northern side of the Whareroa Stream can be given appropriate consideration.

Point Number 17.6 **Category** 13-Natural Hazards

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 pre-development hydrology as possible. The stormwater management systems will also need to be designed to avoid or mitigate adverse

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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.

Accept