

File No: 25 12 00  
Document No: 26967621  
Enquiries to: Dawn Pritchard



14 August 2023

Taupō District Council  
Private Bag 2005  
**Taupō 3352**

Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240  
New Zealand

[waikatoregion.govt.nz](http://waikatoregion.govt.nz)  
0800 800 401

Email: [districtplan@taupo.govt.nz](mailto:districtplan@taupo.govt.nz)

## **Waikato Regional Council – Letter to be Tabled for Plan Change 42, General Rural and Rural Lifestyle Environments**

**To:** Hearing Panel for Plan Change 42, General Rural and Rural Lifestyle Environments, Taupō District Council Proposed District Plan

**Name of submitter:** Waikato Regional Council

1. This is a letter to be tabled for the hearing on Plan Change 42, General Rural and Rural Lifestyle Environments, Taupō District Council Proposed District Plan.
2. Waikato Regional Council (WRC) lodged a submission on Plan Change 42 (PC42) to the proposed Taupō District Plan. Through its submission, WRC opposed the proposed rezoning of areas to Rural Lifestyle Environment.
3. WRC opposed the rezoning on the basis of:
  - a) continued rural land fragmentation
  - b) potential losses of productive land including losses of highly productive land, and
  - c) concerns re impacts on gully systems.
4. Since lodging the submission, WRC, through its agent, has had multiple conversations with Taupō District Council staff and has reviewed the S42A report including appended evidence. Following these further conversations and review, the purpose of this letter is to modify WRC's position on PC42 and to generally support the proposed PC42 as amended through the s42A report. WRC does continue to request a specific amendment to address potential effects on gully systems and natural wetlands.

### **Zoning of land Rural Lifestyle Environment**

5. WRC's submission opposed the zoning of land as rural lifestyle environment. Further discussions with Taupō District Council staff and review of the s42A report have assisted in greater understanding of the provisions and the background to their identification.
6. We understand that the proposed Rural Lifestyle areas have been identified to implement Taupō 2050 and largely encapsulate areas already subject to fragmentation. WRC is supportive of this approach. The Waikato Regional Policy Statement places significant emphasis on forward planning

He taiao mauriora ▲ **Healthy environment**

He hapori hihiri ▲ **Vibrant communities**

He ōhanga pakari ▲ **Strong economy**

for development and specifically provides for rural residential style development where it is consistent with a council-adopted growth strategy.<sup>1</sup>

7. WRC supports the rezoning of the areas identified through PC42 subject to the points raised in the remainder of this letter.

### **Protection of Gully Systems and Natural Wetlands**

8. The WRC submission recommended that the gully systems within the rural environment must be identified and mapped within the proposed plan change and that development within and adjacent to gullies should be avoided. This change was requested to allow for the management of development effects on gully systems, particularly from increased stormwater flows.
9. Pumice geology is a specific characteristic of the Taupō District and gully systems, with pumice geology having a higher risk of erosion. This can be exacerbated by increased hard surfaces and the resulting increased stormwater runoff and velocity.
10. WRC notes recent experiences within the Taupō District where developers have sought to use highly erodible gully systems for stormwater management and infrastructure. In many cases, this will exacerbate erosion, creating risks to both the development in question and downstream infrastructure and property.
11. Following conversations with Taupō District Council staff and review of the section 42A report, WRC accepts the section 42A report response that comprehensive gully mapping across the rural and rural lifestyle environments could be inefficient. However, WRC requests that consideration is given to ensuring that impacts of rural lifestyle development on gully systems are considered through future consent processes and as such provides alternative relief to address the identified concern.
12. The WRC submission sought that PC42 included a reference to natural wetlands in the matters of control and discretion for the proposed controlled and restricted discretionary activity rules. This recommendation was based on implementation of the National Policy Statement for Freshwater Management and the National Environmental Standards for Fresh Water. These policy documents include ensuring that the loss of extent of natural wetlands is avoided, their values are protected, and their restoration is promoted.
13. WRC continues to seek amendments to provide for recognition of natural wetlands and suggests that this can be combined with requested relief to address potential effects on gully systems.
14. For the reasons provided in our primary submission and those given in this letter, WRC requests the following (or words to like effect) is added to the following provision:

‘For the purposes of Rules 4b.5.1.i, 4b.5.2.i, ~~and~~ 4b.5.3.i, 4b.5.Xi and 4b.5.4j, the matters over which the Council reserves control for the purpose of assessment are:

- aa) Any actual or potential effects on gully systems and natural wetlands including through the disposal of stormwater.

---

<sup>1</sup> UFD-M7, LF-M41

## **Additional Requests for Rural Lifestyle Environment Zoning**

15. It is noted that there are a significant number of submissions to PC42 that request rezoning of lands from General Rural Environment to Rural Lifestyle Environment. WRC further submitted in opposition to a number of these submissions.<sup>2</sup> In general, WRC remains concerned that ad hoc rezoning outside that considered to implement Taupō 2050 - Taupō District Council's adopted growth strategy - is contrary to the Waikato Regional Policy Statement and has the potential to create a range of issues including land fragmentation, loss of productive capacity of rural land, increase in greenhouse gas emissions and issues associated with transport and infrastructure.
16. WRC continues to be opposed to further rezoning that is not considered to implement Taupō District Council's Growth Strategy.

## **Conclusion**

17. WRC would like to modify its position in relation to PC42. WRC opposed the plan change based on concerns regarding continued rural land fragmentation, potential losses of productive land including losses of highly productive land and concerns regarding impacts on gully systems.
18. Based on further consideration since the lodging of this submission, WRC is no longer in opposition to the proposed zoning.
19. Given that WRC is in general support of the planners' recommendations, WRC does not consider it necessary to be heard at the hearing.
20. Should the hearings panel require clarification or wish to discuss the above matter further, please contact WRC via the address for service below.

Please note that should the Section 42A author for Taupō District Council change their position or recommendations on the above, WRC's position outlined in this letter may be subject to change.

Should you have any queries regarding the content of this letter please contact Dawn Pritchard, Senior Policy Advisor, Policy Implementation on (07) 949 5153 or by email [dawn.pritchard@waikatoregion.govt.nz](mailto:dawn.pritchard@waikatoregion.govt.nz).

Yours sincerely



**Lisette Balsom**  
**Manager, Strategic Policy Implementation**

Address for Service:  
Megan Kettle  
GMD Consultants  
1 Karl Michael Crescent  
Flagstaff  
Hamilton (3210)

Email: [Megan@GMDconsultants.co.nz](mailto:Megan@GMDconsultants.co.nz)

---

<sup>2</sup> WRC further submission on rezoning included: OS4.1, OS5.1, OS33.1, OS34.1, OD61.1, OS73.1, OS74.3, OS77.1, OS80.1, OS80.2, OS81.1, OS82.1, OS92.1, OS116.1