

27 May 2020



**GREAT LAKE TAUPŌ**

Taupō District Council

OFFICE OF THE MAYOR/CHIEF EXECUTIVE OFFICER

46 Horomatangi Street, Taupō 3330

Private Bag 2005, Taupo Mail Centre

Taupō 3352, New Zealand

T 07 376 0633

F 07 377 3583

E [cbruckner@taupo.govt.nz](mailto:cbruckner@taupo.govt.nz)

[www.taupo.govt.nz](http://www.taupo.govt.nz)

Waikato Regional Council  
Private Bag 3038  
**WAIKATO MAIL CENTRE 3240**

**TAUPŌ DISTRICT COUNCIL SUBMISSION: PROPOSED WAIKATO REGIONAL PLAN CHANGE 2:  
TAUPŌ OVERSEER VERSION**

Thank you for the opportunity to comment on the Proposed Waikato Regional Plan Change 2: Taupō Overseer Version. Taupō District Council supports the intent of the Proposed Plan Change and recognises the significant work that has been done to date to protect the water quality of Lake Taupo.

Council's submission is included below:

Name of Submitter (individual/organisation):	Taupo District Council
Contact Person (if applicable):	Tanya Wood
Agent (if applicable):	N/A
Email Address for Service:	<a href="mailto:twood@taupo.govt.nz">twood@taupo.govt.nz</a>
Postal Address:	Private Bag 2005, Taupo 3352
Phone Number/s	(07) 376 0899

**TRADE COMPETITION AND ADVERSE EFFECTS**

I **could not** gain an advantage in trade competition through this submission. [Refer to guide below for further information]

I **am not** directly affected by an effect of the subject matter of the submission that:

- (a) adversely effects the environment, and
- (b) does not relate to the trade competition or the effects of trade competition.

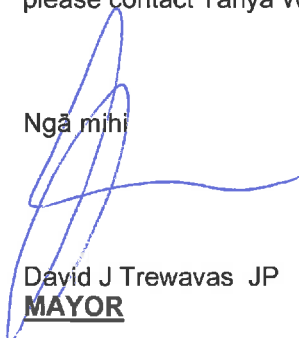
Provision	Support / Oppose	Submission	Decision sought
Rule 3.10.5.1	Oppose	<p>We are opposed to the proposed increase of the Permitted Activity nitrogen leaching limits from 8kg to 12kg via this plan change process.</p> <p>We recognise and support that there are valid reasons to amend the figures in Table 3.10.5.1, however we are opposed to the increase of the Nitrogen Discharge Allowance from 8 to 12 kg per</p>	We seek that Rule 3.10.5.1 stays as per the wording in the Operative Regional Plan.

	<p>hectare per year because of the potential implications that it will have for undeveloped land.</p> <p>The proposed change will directly impact on the capacity for conversion of permitted activity residential development/subdivision. We have used the scenario of a landowner who wishes to develop their 100ha farm for residential sections to outline the potential impacts.</p> <p>Under the status quo rules, 100ha of land operating as a Permitted Activity could be leaching up to 8kg of nitrogen/per hectare/per year from the farming operation. In order to create five new properties, retirement of 3.6ha would be required to offset the additional 17.5kg/nitrogen/year from new advanced wastewater systems (5x3.5kg).</p> <p>Under the proposed plan change, this then becomes 100ha of land leaching 12kg of nitrogen/per hectare/per year. The landowner would only need to retire 2ha of land to achieve 5 residential house sites.</p> <p>We are concerned that when amending this rule, consideration has not been given to the implications of trading nitrogen and converting to permitted activities (farming or non-farming) under this rule.</p> <p>We believe that this issue would be better dealt with as part of the wider review of the Waikato Regional Plan and a 17.5kg of N.</p>	
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In addition, we have identified another matter that is outside the scope of this plan change, that we would like you to consider as you progress the review of the Waikato Regional Plan. Currently in Chapter 3.10, there is no simple mechanism for the transfer of nitrogen another to entity (for example Taupo District Council) for utilisation where a landowner is no longer farming and will connect to one of Council's reticulated wastewater schemes. We would like Waikato Regional Council to consider through the review of the Regional Plan whether there is a possibility for a simple mechanism to be developed which would enable nitrogen to be transferred in such situations.

We thank you for the opportunity to provide you with our submission. For matters relating to this submission, please contact Tanya Wood - Policy Advisor, by email [twood@taupo.govt.nz](mailto:twood@taupo.govt.nz) or ph. (07) 376 0899.

Ngā mihi



David J Trewavas JP  
**MAYOR**