

Submission from NZPork

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Submitter type*	Individual	<input type="checkbox"/>
	NGO	<input type="checkbox"/>
	Business / Industry	<input checked="" type="checkbox"/>
	Local government	<input type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/>

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* Questions marked with an asterisk are mandatory.

Draft first set of National Planning Standards

1. Do you support the draft first set of National Planning Standards?

Yes

No

While in general support for the development of National Planning Standards, NZPork makes the comment that in regard to the Mandatory Directions, significant time/cost has already been spent/committed to recent and active plan change processes. Plan changes to give effect to the National Planning Standards (particularly definitions) will invariably have significant consequential effects through planning documents that will require organisations like NZPork to again relitigate issues. The most obvious issue being the proposed definitions of Buildings and Structures.

We also note that while the standards proposed a tiered implementation timeframe for different Councils, it is only a 2 year difference so means little in planning timeframes.

2. S-RPS: Regional policy statement structure standard

NZPork supports a framework that proposes a high level of prescription at the front 'administrative' end of the Regional Policy Statement structure and becoming more flexible in the resource 'theme' chapters, where subordinate sections can be created as needed.

The framework could be improved by including a Section 'Integrated Management of Natural and Physical Resources'. Good examples include those equivalent sections from the Bay of Plenty and Northland Regional Policy Statements. The alternative could be to rename the proposed section on 'Cross Boundary Issues' which could then be included in the Section on Integrated Management.

a. Parts 3 and 4 – Core policy statement provisions

NZPork opposes the suggested option for local authorities to consider combining the Theme of Land with Water. Integrated managed of these resources should be considered under a Section on Integrated Management of Natural and Physical Resources' but given the functions, powers and duties of Regional (s30) and territorial authorities (s31), the Themes must remain separate.

b. Part 5 – Evaluation and Monitoring

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3. S-RP: Regional plan structure standard

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a. Parts 3, 4 and 5 – Core plan provisions

NZPork opposes the suggested option for local authorities to consider combining the Theme of Land with Water. Integrated managed of these resources should be considered under a Section on Integrated Management of Natural and Physical Resources' but given the functions, powers and duties of Regional (s30) and territorial authorities (s31), the Themes must remain separate.

b. Part 6 – Evaluation and Monitoring

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4. S-DP: District plan structure standard

NZPork consider that the requirement to have a Strategic Direction should be mandatory within District Plans. It is currently proposed that this only be required where a local authority is including provisions on a significant resource management matter. NZPork considers that it will always be the case that a local authority will need to address significant resource management matters and that a Strategic Direction is necessary for integrated resource management.

NZPork considers the Part 4 District Wide Matter “Natural Environmental Values’ is better termed ‘Natural Resources’.

NZPork would support a new Part 4 District Wide Matter for ‘Rural Growth’ covering rural production outcomes and accommodating people/business.

NZPork supports the proposed zoning regime.

5. S-CP: Combined plan structure standard

Comments above are relevant here.

6. S-IGP: Introduction and general provisions standard – Part 1 of all plans and policy statements

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a. Introduction chapter

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b. How plan works chapter

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c. Interpretation

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d. Plan integration

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e. Formation of standards with tangata whenua

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f. National direction

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7. S-TW: Tangata whenua structure standard – Part 2 of all plans and policy statements

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- a. Recognition of iwi/hapū chapter
[Click here to enter text.](#)
- b. Tangata whenua local-authority relationships chapter
[Click here to enter text.](#)
- c. Iwi and hapū planning documents chapter
[Click here to enter text.](#)
- d. Consultation chapter
[Click here to enter text.](#)
- e. Use of te reo Māori
[Click here to enter text.](#)

8. S-SD: Strategic direction structure standard – Part 3 of District plans

NZPork consider that the requirement to have a Strategic Direction should be mandatory within District Plans. It is proposed that this only be required where a local authority is including provisions on a significant resource management matter. NZPork considers that it will always be the case that a local authority will need to address significant resource management matters and that a Strategic Direction is necessary for integrated resource management.

9. S-DWM: District wide matters standard – Part 4 of District plans

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- a. Natural Environment Values Chapter

NZPork considers the Chapter “Natural Environmental Values’ is better termed ‘Natural Resources’.

- b. Environmental Risks Chapter

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- c. Community Values Chapter

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- d. Infrastructure and Energy Chapter

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- e. Subdivisions Chapter

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- f. General District Wide Matters Chapter

NZPork would support a new Chapter for ‘Rural Growth’ covering rural production outcomes and accommodating people/business.

10. S-ASM: Draft area specific matters standard – Part 5 of District plans, Part 6 – Combined plans

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a. Zone framework (individual and range)

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b. Purpose statements

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c. Additional special purpose zones and criteria

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d. Precincts chapter

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e. Development areas chapter

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f. Designations chapter

[Click here to enter text.](#)

11. S-SAM: Schedules, appendices and maps standard – Part 6 – Regional policy statements, Part 7 – Regional plans, Part 6 – District plans, Part 8 – Combined plans

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12. F-1: Electronic accessibility and functionality standard

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a. Standard baseline requirements

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b. Level 5 requirements

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13. F-2: Mapping standard

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a. Zone colour palette

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b. Symbology

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14. F-3: Spatial planning tools (Regional) standard

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a. **Range of tools**

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b. **Zone**

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c. **Overlay**

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d. **Specific control**

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e. **FMU**

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f. **Airshed**

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g. **Area**

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15. F-4: Spatial planning tools (District) standard

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a. **Range of tools**

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b. **Zone**

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c. **Overlay**

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d. **Precinct**

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e. **Specific control**

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f. Development areas

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g. Designation

16. F-5: Chapter Form standard

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a. Chapter form

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b. Rules

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c. Rule tables

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17. F-6: Status of rules and other text and numbering form standard

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a. Status of rules and other text

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b. Numbering

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18. CM-1: Definitions standard

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a. Individual definition

NZPork queries the relevance of including definitions that have the same meaning as in section 2 of the RMA.

NZPork has concerns that the majority of the proposed definitions are urban focused but with some rural references, e.g Intensive Primary Production, Primary Production, Rural Industry. In the absence of considering a broader reach of National Planning Standards for rural activities, the definitions are isolated and will require considerable work to incorporate into many existing planning frameworks.

Building

NZPork sees significant issues with this definition and the associated definition of structure which differs from the existing definition in the RMA. As proposed this would require exclusions to be assessed and listed in rule. For NZPork this will likely

mean significant time and cost required to pursue exclusions and an appropriate planning response for rural buildings and structures associated with pork production e.g moveable pig shelters, farrow hut, ecobarns.

Intensive primary production

The standards propose a definition for Intensive Primary Production. In the absence of a full package that deals with setbacks/reverse sensitivity/structures/etc the definition is isolated and will again require significant time and cost to pursue exclusions and an appropriate planning response.

Residential Unit / Minor Residential Unit

The definitions do not extend to cover farm workers accommodation a common and necessary component of many rural production activities.

Primary Production – or Rural Production?

The terms are inconsistently used through the standards and will create confusion.

Reverse sensitivity

NZPork supports the definition of reverse sensitivity to provide a consistent understanding across all planning documents.

b. Additional definitions

19. CM-2: Draft noise and vibration metrics standard

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a. Technical support

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20. Implementation

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a. ePlanning implementation

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b. Timing

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c. Support

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d. District plan structure guidance

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e. Regional policy statement and regional plan structure guidance

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- f. District plan spatial planning tools and zone framework guidance

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- g. Regional plan and policy statement spatial tools guidance

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- h. Chapter form and status of rule and other text numbering guidance

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- i. Additional guidance materials required

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21. Future content for standards

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- a. Utilities provisions

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Other comments

22. Do you have any further comments you wish to make about the Government's proposal?

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Releasing submissions

Your submission may be released under the Official Information Act 1982 and will be published on the Ministry's website. Unless you clearly specify otherwise in your submission, we will consider that you have consented to both your submission and your name being posted on the Ministry's website.

Please check this box if you would like your name, address, and any personal details withheld.

Note that the name, email, and submitter type fields are mandatory for you to make your submission.

When your submission is complete

If you are emailing your submission, send it to PlanningStandards@mfe.govt.nz as a:

- PDF
- Microsoft Word document.

If you are posting your submission, send it to National Planning Standards, Ministry for the Environment, PO Box 10362, Wellington 6143.

Submissions close at 5:00 pm on Friday 17 August 2018.