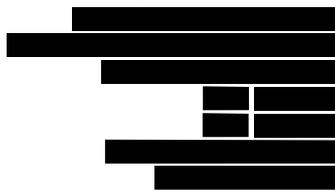


09 August 2018



Planning standards
c/- Ministry for the Environment
P O Box 10-362
WELLINGTON 6143



To whom it may concern

TAUPŌ DISTRICT COUNCIL SUBMISSION ON THE DRAFT NATIONAL PLANNING STANDARDS

General Points

Taupō District Council appreciates the opportunity to make comment on the Draft National Planning Standards. The standards have the potential to make plan development simpler in the long term and may remove some of the contention during plan development around simple matters such as definitions.

For Taupō District Council, implementing the standards is a relatively straight forward process. The District Plan Review is currently in its early planning phase so we will pick up the standards and use the new structure as we develop the plan. For this reason we are supportive of the proposed five year implementation timeframe.

We note that it will not be so simple for many councils who will be trying to reformat their existing plans to be consistent with the Standards. The consequential amendments will be a significant issue for many councils, especially those who are smaller and less well resourced. The financial implications on these councils who do not have a review planned within the next 5 years are likely to be significant and should not be underestimated.

The standards seem to be a strongly driven from plan users who work nation-wide, and a desire that there is some consistency across all plans for these users. It should be noted that these users are usually subject matter experts such as planning consultants, developers and lawyers. It is their job to be able to understand and interpret plans. On the other hand, local plan users, such as the local community who want to protect a certain character in their area for example, are unlikely to require any understanding of how plans outside their local district or city work. The point being that the local functionality of plans should not be compromised for the sake of cross-council plan users who are often subject experts in their field, and are required to understand how plans work.

This submission focuses on parts of the standards where we see difficulties with implementation or where we require clarification. Where possible we have provided examples to give context to these potential issues.

Examples are shown in *italics*. Where Taupō District Council seeks a change or clarification to the standards this is indicated by a text box.

Structure Standards – District Plan, Introduction and General Provisions, Tangata Whenua, Strategic Direction

Taupō District Council supports the Structure Standards that set up the introductory chapters of the District Plan. It makes sense that these chapters are consistent across Plans and the proposed structure seems to make logical sense.

Structure Standards – District Wide Matters

Taupō District Council supports the district wide matters chapter. The Taupō District Plan currently has a district wide chapter and this works well for matters which cut across different zones/environments.

Eplans need to be able to filter correctly to ensure district wide matters are captured. *For example, someone living in the rural zone, with a significant natural area overlay needs to be able to select their property and view both sets of provisions.* Otherwise there is the potential that district wide matters are missed and cause confusion for applicants.

Structure Standard – District Wide Matters

Zone Chapters

Taupō District Council supports the proposed 27 zones, although we do have some questions around the precincts and whether these will be used to create defacto zones (see next section). The purpose statements for the zones should not become so specific that it becomes a problem to have activities in that zone that do not fit neatly within the purpose description. This is especially relevant in the rural zone.

Currently in the Taupō District rural environment there are recreational, industrial and other activities that are difficult to categorise. Examples include a motor sport park, pony clubs, tourist activities and power stations. Although there is the potential that at least some of these activities may be rezoned through the review, new activities will often start operating under a consent and then continue to operate within the rural environment. There is the potential that the purpose statements are used by appellants to prevent activities that do not fit neatly within the description from occurring. This is especially relevant in Taupō where, due to poor soils, primary production is low relative to other areas. In Taupō, alternative uses in the rural environment often need to be found in order to make a living.

It may be helpful to expand the rural zone description beyond primary production to recognise the wide range of activities that occur in the rural environment. Given there is also the Rural Production Zone it seems that the Rural Zone purpose description could be more general.

Taupō District Council submits that the rural zone purpose description be expanded to recognise the wide range of activities that occur in the rural environment;

Precincts

Our key concern with this standard is the precincts. There is the potential for these to become defacto zones and the limitation of plans to fit within the 27 zones becomes irrelevant because plans address variation with a multitude of precincts. The difficulty with precincts is there is the potential for confusion over whether the zone or precinct rules preside.

Currently within the Taupō District Plan we have areas which vary from the zone by only one policy provision. *An example of this is the Height Restricted Area in the Taupō District Plan. These areas have been established through previous planning processes and aim to reduce bulky or visually obtrusive development and protect the interface between land and water, to preserve the natural character of the district's lakes and rivers and their margins.* We are unclear how this type of situation would be addressed under the standards as proposed.

Taupō District Council submits that further thought be given to the role of the precincts and whether they will become defacto zones and make plans more complicated to use.

We seek clarification on how it will be possible to address scenarios where only one provision differs from the standard underlying zoning.

Development Areas

Development areas are supported and make sense. The Taupō District Plan currently has growth areas which are identified to undergo a structure planning process, or have undergone the structure plan process which is then incorporated into the District Plan Once a development area has been fully subdivided the intention seems to be to uplift the development area status. It is unclear what zoning the land would revert to and how any planning provisions specific to that area might be retained.

An example of this would be the Kinloch structure plan in Taupō, where there are 5 different sets of provisions which affect provisions such as height, density and setbacks. If the development area/structure plan was to be removed, these areas would all need to become separate precincts. As submitted above multiple precincts have the potential to make plans more confusing and complicated than they currently are, as at least with zones there is clarity over which rules preside where.

Taupō District Council seeks clarification on how provisions developed through the Structure Plan process will be implemented once the development area is removed.

F1 Electronic Accessibility and Functionality

Taupō District Council has recently converted its District Plan to Eplan format, which would meet the current standards as they are proposed. The requirements for electronic accessibility may place a significant burden on smaller Councils who have not budgeted for this conversion.

Clauses 11 and 12 on Table 18 of the draft standards are cause for concern. Clause 11 states that all versions of the current operative and proposed plan must be available on the website. This is a huge amount of work

for very little gain. *Taupō District Council has approximately 45 versions of the current plan (variations, plan changes, clause 20a changes and a reformat). These versions are all broken into 50 separate PDFs with one for each chapter. To meet the requirements we would need to stitch 50 different documents together for each of the 45 versions. We have concerns over the size of the documents this would result in. The same would then need to be done for 120 maps. In order to have documents of a manageable downloadable size, we estimate it would result in approximately 420 documents on the website for the current plan only (not counting transitional RMA plans).*

Aside from the sheer volume of work to do this, this proposal has the potential to create significant confusion for the (small number of) users who would like to access older versions of the plan. Also little value is seen in providing the entire plan. Usually if an applicant requires a previous version of the plan they only want one or two sections. This request comes through to our planners as a service request and the correct section/s is supplied to them. This is likely to be a much quicker and simpler process for the applicant than them trying to wade through 420 documents on our website.

We also note that the provisions of the Local Government Official Information and Meetings Act provide a mechanism, process and set timeframes for councils to provide information.

Taupō District Council strongly submits clause 11 and 12 of Table 18 are removed from the proposed standard and a requirement be inserted which simply states the previous versions of the plan must be made available to members of the public who request them. A timeframe for supplying the information could be inserted if this is a concern.

F2 Draft Mapping Standard

Taupō District Council has concerns over the similarity of the colours proposed by the draft mapping standard.

The proposed colours that seem too similar are:

- Low density residential and medium density residential
- Rural residential, rural settlement and local commercial
- Open space, sport and active recreation and conservation

It is unclear why sites of significance to Maori has been included within the symbology table, given that this will vary between districts as a result of consultation with iwi.

Within the symbology table there are some symbols which only give one symbol or colour when there can be multiple categories of that item. *For example:*

- *Protected tree – Taupō District Council has notable and amenity trees within the protected tree category. Only having one symbol would mean plan users would need to reference the Plan Schedule to find out if it was Notable or Amenity.*
- *Hazards – Taupō District Council has 3 levels of flood risk (a methodology set out by the Regional Policy Statement) which are currently shown as three colours on the planning maps. The planning standards propose one colour for all Hazards represented by a polygon (flood, volcanic, coastal and*

fault). Once again this means the plan user will need to refer to a schedule to find out the hazard type. This does not seem helpful or intuitive for a plan user.

Taupō District Council submits that advice be sought from experts, for example graphic designers, to establish a palette of colours which ensures enough variation between zone map colours, and

Further work be done on the symbology table to give additional options where there are multiple categories required.

F5 Chapter Form Standard

Advice from our Eplan providers has been that filtering from tables is more difficult than from free text. This needs to be clarified to ensure there is not difficulties filtering rules from rule tables. *For example, if an applicant searches the residential environment there may be issues bringing through all the rules from the rule table.* Tables provided an easier format for users of a paper based plan, however with the move to Eplans and their ability to filter provisions it may make more sense to utilise free text.

Taupō District Council submits that clarification be sought from Eplan providers as to whether filtering is easier via provisions in a text format or a table format.

F7 Definitions

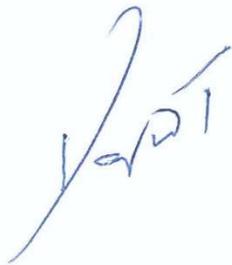
Please refer to the specific submissions on definitions below:

Definition	Comment	Submission
Visitor Accommodation	Currently the Taupō District Plan corresponding definition includes associated functions (such as restaurants and conference facilities) within this definition. The proposed National Planning Standard definition and the use of "primarily" does not provide clarity on this.	Clarity be provided within this definition as to whether associated functions are included.
Building	This definition could currently exclude a carport but include a gazebo or tent. Also the definitions for building and structure are cyclical i.e. a building is a structure and a structure is a building.	Further work be done to refine this definition. Could this definition be aligned with the Building Act?
Setback	The Taupō District Plan currently also defines the front boundary setback.	Consideration be given to also defining the front boundary setback or clarification that a separate definition for this would be permitted.
Educational facility	The inclusion of the term pre-set syllabus within the definition may exclude some educational facilities which do not have a pre-set syllabus for example after school care or holiday facilities.	Consideration be given to whether the use of the term "pre-set syllabus" is necessary within this definition.
Gross floor area	We interpret this definition to include areas which don't have floor space, for example a high studded building with half a mezzanine floor would be calculated to have double the actual ground floor. This seems to be more about building bulk than ground floor area.	Consider removing void areas from the definition.

Height	The Taupo District Plan excludes structures from this definition, so that chimneys, masts or antenna (less than 0.6m) do not impact on overall building height.	Consideration be given to exclude chimneys, masts or antenna from this definition.
Height in relation to boundary	The Taupō District Plan definition excludes chimney, mast or antenna from this definition so that these factors do not influence where a building can be positioned. This reflects the primary concern for the related provisions which tends to be building bulk.	Consideration be given to exclude chimneys, masts or antenna from this definition.
Industrial activity	The Taupō District Plan includes office activities associated with the industrial activity and many will include offices within the facility.	Consideration be given to include the offices associated with industrial activities within the definition.
Signs	The Taupō District Plan excludes election signage from the definition of signs, as otherwise all election signage would require a consent.	Consideration be given to exclude election signage from the definition of signage.
Stormwater	In Taupō most stormwater does not make it to a water body, instead going to ground soakage. Also Taupō does not have a Coastal Marine Area.	Add ground soakage to the definition as follows " <i>a waterbody, ground soakage or the coastal marine area</i> ". Also, to save confusion, local authority areas without a Coastal Marine Area should be able to exclude this term.

Thank you for the opportunity to submit on the draft National Planning Standards. If you require any clarification on our submission please contact [REDACTED] or [REDACTED]

Yours sincerely



David J Trewavas JP

MAYOR