Your submission to Draft first set of National Planning Standards

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Reference no: 25

Clause
Overarching comment
Notes
In my opinion these definitions should become mandatory on all Councils on the date that the Standard comes into force, not up to 7 years later, by which time the RMA would be 34 years old. Having nationwide definition standards is necessary now not gradually. To let these come into force gradually will tend to thwart the reasoning behind the standards. I agree that Plan structure and methods outlined in other parts of the proposed Standard could come in as Plans are renotified, however it seems simple to require by statute that Councils introduce these definitions in place of those they have. There will still be other definitions peculiar to each Plan that are not affected by the National changes.

Clause
Individual definition
Notes
Accessory Building: I support this proposed definition Gross Floor Area: The wording does not make it clear whether stairwells, service shafts and the like would be regarded as just one "area" for all levels, or counted multiply for each level. Clarification is needed. Land disturbance and Earthworks: It is unclear why there needs to be two definitions. I note that earthworks is proposed to only apply if the finished level is different to the pre-works level. Maybe this is important but it needs further clarification in my opinion. Site: b) What does the work "administered" mean in this definition? Does it refer to the case of amalgamated titles, or other situations as well. These need to be clarified. Visitor Accommodation: Please clarify that this includes temporary spaces such as camping.

Clause
Additional definitions
Notes
Indigenous vegetation: It is my view that national definitions are needed for. Clearance of indigenous vegetation: It is my view that national definitions are needed for. These definitions need to include specifications for groups of trees, single specimen trees, including minimum definitions of height, girth and other parameters that define vegetation by age or context. The risk of a broad definition is that saplings in private gardens could be regarded as vegetation. The significance of the vegetation must be clear. At present there is a plethora of definitions and application of those definitions.