Submission from NZPork

Contact information

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Submitter type*

- Individual
- NGO
- Business / Industry [X]
- Local government
- Central government
- Iwi
- Other (please specify) [ ]

* 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?
   - [X] 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

Click here to enter text.

3. S-RP: Regional plan structure standard

Click here to enter text.

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
   Click here to enter text.
   a. Introduction chapter
      Click here to enter text.
   b. How plan works chapter
      Click here to enter text.
   c. Interpretation
      Click here to enter text.
   d. Plan integration
      Click here to enter text.
   e. Formation of standards with tangata whenua
      Click here to enter text.
   f. National direction
      Click here to enter text.

7. S-TW: Tangata whenua structure standard – Part 2 of all plans and policy statements
   Click here to enter text.
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
      Click here to enter text.

   c. Community Values Chapter
      Click here to enter text.

   d. Infrastructure and Energy Chapter
      Click here to enter text.

   e. Subdivisions Chapter
      Click here to enter text.

   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

Click here to enter text.

a. Zone framework (individual and range)
   Click here to enter text.

b. Purpose statements
   Click here to enter text.

c. Additional special purpose zones and criteria
   Click here to enter text.

d. Precincts chapter
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e. Development areas chapter
   Click here to enter text.

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
   Click here to enter text.

b. Level 5 requirements
   Click here to enter text.

13. F-2: Mapping standard

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a. Zone colour palette
   Click here to enter text.

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

Click here to enter text.

- **a. Range of tools**
  
  Click here to enter text.

- **b. Zone**
  
  Click here to enter text.

- **c. Overlay**
  
  Click here to enter text.

- **d. Specific control**
  
  Click here to enter text.

- **e. FMU**
  
  Click here to enter text.

- **f. Airshed**
  
  Click here to enter text.

- **g. Area**
  
  Click here to enter text.

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

Click here to enter text.

- **a. Range of tools**
  
  Click here to enter text.

- **b. Zone**
  
  Click here to enter text.

- **c. Overlay**
  
  Click here to enter text.

- **d. Precinct**
  
  Click here to enter text.

- **e. Specific control**
f. Development areas

Click here to enter text.

g. Designation

16. F-5: Chapter Form standard

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a. Chapter form

Click here to enter text.

b. Rules

Click here to enter text.

c. Rule tables

Click here to enter text.

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

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a. Status of rules and other text

Click here to enter text.

b. Numbering

Click here to enter text.

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
Click here to enter text.
   a. Technical support
   Click here to enter text.

20. Implementation
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   a. ePlanning implementation
   Click here to enter text.
   b. Timing
   Click here to enter text.
   c. Support
   Click here to enter text.
   d. District plan structure guidance
   Click here to enter text.
   e. Regional policy statement and regional plan structure guidance
f. District plan spatial planning tools and zone framework guidance

g. Regional plan and policy statement spatial tools guidance

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

i. Additional guidance materials required

21. Future content for standards

   a. Utilities provisions

Other comments

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

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.