15 August 2018

Planning Standards
Ministry for the Environment
Manatū Mō Te Taiao
PO Box 10362
WELLINGTON 6143

Dear Sir/Madam

Draft National Planning Standards

Whanganui District Council strongly supports the introduction of Draft National Planning Standards. These Standards will provide a consistency in regulation and application of objectives, policies and rules (including methods) throughout the country and will assist councils which have limited budgets for plan development.

In implementing the DNPS, Council recommends that amendments be made to:
• increase the number of definitions for clarity;
• improve aspects of the colour palette to increase usability; and
• include additional zones that are common to territorial authorities.

Detailed comments are included below.

If you require further information please contact Hester den Ouden on

Yours sincerely

[Signature]

Hamish McDouall
Mayor
Whanganui District Council

Kym Fell
Chief Executive
Whanganui District Council
Strong Support
Whanganui District Council strongly supports the introduction of the Draft National Planning Standards.

These Standards will provide a consistency in regulation and application of objectives, policies and rules (including methods) throughout the country and will assist councils which have limited budgets for plan development. This level of guidance has been long overdue and is therefore very welcome.

The detailed amendments which Council trusts are helpful are as follows:

Amendments
The DNPS would benefit from additional matters either for the purpose of clarification, or consistency and it is recommended that the DNPS also cover the following areas:

S-DP and S-ASM Additional Zones

Additional Zones
While additional special zones are proposed in the DNPS Council recommends that the following additional zones should be included. The following text seeks to provide some structure to this view.

Add Coastal Zone

Add Purpose Statement:

The purpose of the Coastal Zone is to provide primarily for management of the sensitive coastal environment

Reason:
Many districts and regions have a coastal environment within their jurisdictions which under the NZ Coastal Policy Statement is required to be carefully managed. The National Planning Standards would benefit from requiring a coastal environment zone to give effect to the NZ Coastal Policy Statement. Therefore inclusion in the DNPS is considered warranted.
Add **Forestry Zone**

**Add Purpose Statement:**

The purpose of the Forestry zone is to primarily provide for production forestry and
associated activities

**Reasons:**

While many definitions of ‘Rural Production’ include forestry, Plantation Forestry is now of
sufficient significance that a National Environmental Standard was promulgated in 2017.
Forestry can have serious adverse effects on the environment as shown by recent flooding in,
for instance, Tolaga Bay the activity would benefit from specificity that a specific zone would
provide.

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Add **Historic Heritage Zone or Overlay**

**Add Purpose Statement:**

The purpose of the Historic Heritage zone is to provide primarily for the retention,
preservation and restoration of historic heritage within the District.

**Reasons:**

Whanganui District like many other provincial cities and towns has notable areas, and in our case
sizable areas, that contain historic buildings and other heritage items. A specific objectives,
policies and rule section would achieve the standardisation that the Ministry seeks. While an
Overlay approach could be used, it is considered that because of the significance of historic
heritage areas to Whanganui District, along with a number of other councils and the Ministry’s
desire to standardize District Plan provisions, that the provisions of a zone could be useful to
achieving recognise and provide for s 6(f) historic heritage which is a matter of national
importance.

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Add a **Mining Zone**

**Add Purpose Statement:**

The purpose of the Mining zone to provide primarily for mining activities and control over
any adverse effects on the environment that may be generated by mining activities

**Reasons:**

Almost all TLAs have quarrying or mining activities within their districts. A standardised approach
to objectives, policies, rules and other methods (if any) would greatly assist in standardisation
across the provisions of District Plans. Adverse effects on the environment from mining activities are very similar in terms of noise, blasting –vibration, dust and transportation, therefore these could be standardized throughout the country.

**Add Overlays**

Overlays provide a very useful tool which defines a set of matters that will in addition to the base zoning such as the provision for the ability to use Overlays notating eg Historic Heritage. It is noted that overlays are contained in the Draft Spatial Planning Tools Section which is supported. However a definition and purpose needs to support the use of Overlays within the body of the Draft National Planning Standards

**S-DWM District Wide Matters**

**Subdivisions and Roading including Parking**

Subdivision and Roading including parking can be a significant part of council’s regulatory workload. There are numerous design and infrastructure standards required of subdivisions and roading design that would be universal to most if not all councils. The application of such commonly used standards in the DNPS would be a practical advantage and also reduce variations between plans. It would also provide certainty to the community about matters such as parking standards that cannot be re-litigated as they are part of a National Planning Standard.

Therefore further work on the National Planning Standards in these areas is considered necessary to give better guidance and standardisation across the country in the matters of common objectives, policies and rules.

The following is submitted as an example:

**CAR PARKING**

**Purpose**

- To ensure that car parking is provided in accordance with National Planning Standards Framework.
Objectives

- To ensure the provision of an appropriate number of car parking spaces, having regard to the demand likely to be generated by the activities on site and the nature of the locality.
- To promote the efficient use of car parking spaces through the consolidation of car parking facilities.
- To ensure that car parking does not adversely affect the amenity of the locality.
- To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.

Notification of Resource Consents

Council suggests that a chapter be required that clarified which activities, while requiring a resource consent, need not be publicly notified, similar to the Victoria State of Australia’s VICSMART PLANNING. Such a set of provisions would make the non-notification process clearer to the general public. This approach would be consistent with s 87AAC RMA, and to would be extremely useful to have this standardised.

CM-1 Definitions

The Definitions section of the DNPS contains both specific (helpful) and some less specific definitions where it is considered that alternative definitions text would be of use. Thirdly there are a number of areas where additional definitions would be useful, helpful for interpretation or for reasons of consistency. The following are recommended for inclusion in the Definitions Standard.

Definition for Ancestral land:

- means
  1. Maori land as defined under Te Ture Whenua Maori Land Act 1993 or
  2. Land returned via Treaty Settlement Claims process.

Definition for Archaeological Site:

has the same meaning as in section 6 of the Heritage New Zealand Pouhere Taonga Act 2014 (as set out in the box below)

- means
(a) any place in New Zealand, including any building or structure (or part of a building or structure), that—
   (i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and
   (ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and

(b) includes a site for which a declaration is made under section 43(1)

Definition for *Aquaculture activities* has the same meaning as in section 2 of the RMA (as set out in the box below)

(a) means any activity described in section 12 done for the purpose of the Breeding, hatching, cultivating, rearing, or ongrowing of fish, aquatic life, or seaweed for harvest if the breeding, hatching, cultivating, rearing, or ongrowing involves the occupation of a coastal marine area; and

(b) includes the taking of harvestable spat if the taking involves the occupation of a coastal marine area; but

(c) does not include an activity specified in paragraph (a) if the fish, aquatic life, or seaweed—
   (i) are not in the exclusive and continuous possession or control of the person undertaking the activity; or
   (ii) cannot be distinguished or kept separate from naturally occurring fish, aquatic life, or seaweed; and

(d) does not include an activity specified in paragraph (a) or (b) if the activity is carried out solely for the purpose of monitoring the environment coastal marine area place in the correct alphabetical order ie before ‘community activity’

Definition for *Dwelling*

has the same meaning as in section 2 of the RMA (as set out in the box below)

means any building, whether permanent or temporary, that is occupied, in whole or in part, as a residence; and includes any structure or outdoor living area that is accessory to, and used wholly or principally for the purposes of, the residence; but does not include the land upon which the residence is sited
Definition for **Forestry:**
has the same meaning as in section 3 of the RMA and National Environmental Standards for Plantation Forestry Regulations 2017 (as set out in the box below)

(a) means planting and growing plantation forestry trees on land where there is no plantation forestry and where plantation forestry harvesting has not occurred within the last 5 years; but

(b) does not include vegetation clearance from the land before planting

Definition for **GIS**
means geographical information system - an electronic system of information storage, retrieval and presentation used by a Council.

Definition for **Local authority**
has the same meaning as in section 2 of the RMA (as set out in the box below).
means a regional council or territorial authority

Definitions from the National Policy Statement on **Urban Development Capacity**;
Business Land, decision-maker, demand, development capacity, development infrastructure, Feasibility etc,

Definitions from the National Policy Statement on **Electricity Transmission** such as:
Electricity Transmission network, Electricity Transmission and transmission activities/assets / infrastructure / resources system, National environmental Standard, National grid, Sensitive activities etc

Definitions from **National Environment Standards** as per:
- Production Forestry,
- Drinking Water,
- Telecommunications,
- Electricity Standards, and
- Assessing and Managing Contaminants in Soil to protect Human Health.

Amend definition of **Net site area:**“...site, but does not include” “but does not include” need not be highlighted in blue.

Amend Definition of **Noise:**
The definition of noise while being a direct quote from the Act does not actually define - noise. We suggest reference to the Noise Standards NZS 6801: 2008, 6802: 2008, 6803:

**Notional boundary** “…boundary, if it” the “if it” does not need a highlight

**Definition of Plan**

has the same meaning as in section 43AA of the RMA (as set out in the box below)
means a regional plan or a district plan

**district plan—**

(a) means an operative plan approved by a territorial authority under Schedule 1; and

(b) includes all operative changes to the plan (whether arising from a review or otherwise)

**Definition for Regional plan**

has the meaning given in section 43AA of the RMA (as set out in the box below)

regional plan—

(a) means an operative plan approved by a regional council under Schedule 1 (including all operative changes to the plan (whether arising from a review or otherwise)); and

(b) includes a regional coastal plan

**Definition for Policy Statement**

has the same meaning as in section 43AA of the RMA (as set out in the box below)

means a regional policy statement

**Definition for Parking Space** – this would be universal eg

means land on a site set aside for the parking of motor vehicles.

**Definition for Permeability**

means: eg

a. With regard to Roads: The extent to which connections are provided between roads within the roading network.
b. With regard to fences or boundary structures: The degree to which space is provided that is visually unobstructed from one side to the other.

c. With regard to ground surfaces, the degree to which water is able to infiltrate through it to ground

Definition for Place of Assembly - if retirement villages have a definition so should these facilities means any land and/or building used in whole or in part for the assembly of people for community, social, cultural or religious purposes but excludes commercial activities (including places of entertainment such as cinemas).

Definition for Primary Production:

means

a) means any agricultural, pastoral, horticultural, forestry or aquaculture activities for the purpose of commercial gain or exchange; and

b) includes any land and auxiliary buildings used for the production of the products that result from the listed activities; but

c) does not include processing of those products.

Definition for Residential care facilities:

means a building or buildings, which provide care for people who require ongoing health care or supervision provided by paid staff in, and includes any private or public restrooms boarding school hostel or other similar places and having accommodation for five or more persons excluding staff.

Definition for Retail activity

means an activity which entails the use of a building or buildings for the direct sale of goods to the public. This definition shall not include service stations or fast food restaurants.

Definition for Reticulated infrastructure:

means networks of infrastructure services including for the provision of water, wastewater, and stormwater services including pipes, associated pumping stations, treatment works, swales, detention areas, and other ancillary equipment, structure or facilities.
Definition for **Reverse sensitivity**:  
means the conflict between incompatible land uses where a newly established activity complains about the effects on amenity (environmental qualities i.e. levels of noise) from a legally established pre-existing activity.

Definition for **Riparian Margin**:  
means the strip of land along the edge of a waterbody including streams, lakes and wetlands. The riparian margin starts at the mean high spring water level and extends inland 20 metres.

Definition for **Secondary flow**:  
means the estimated surface water runoff in excess of the primary design flow of the stormwater network.

Definition for **Secondary flow path**:  
means the path taken by stormwater runoff in excess of the primary design flow of the stormwater network.

Definition for **Segregation strips**:  
means a piece of land, or restrictive covenant, or easement, other means by which prevent land being accessing legal road.

Definition for **Sensitive activities**:  
means the following activities:  
a) Residential activities  
b) Farm stays and other buildings used for visitor or tourist accommodation  
c) The accommodation or care for people including hospitals  
d) Educational facilities including childcare facilities, kohanga reo, primary, intermediate and secondary schools.

Definition for **Service Station**:  
means a site where the principal activity is the sale of motor vehicle fuels (including petrol, CNG, LPG and diesel) and may include ancillary and incidental activities like car wash, mechanical repair, eg service and inspection of motor vehicles (but excludes panel beating) and the sale of motor car accessories and other goods for the convenience of the travelling public.
Definition for **Site coverage:**

means the portion of the net site area, expressed in percentage terms, which is covered by buildings and storage space, and includes eaves, and excluding:

a. uncovered swimming pools
b. eaves not exceeding 1 meter in width.
c. Balconies, decks and terraces not exceeding 2.4 meters above ground level.
d. Any retaining wall less than 1.5m in height measured from the lowest adjoining ground level.
e. Any fence or wall (other than a retaining wall) less than 1.8 meters in height measured from the lowest adjoining ground level within 1 metre of a property boundary.
f. Any pool or tank which is less than 1.0m in height measured from the lowest adjoining ground level.
g. Play equipment and letterboxes.

Definition for **Vegetation Clearance:**

means the destruction of vegetation by any means, including cutting, burning, clearing or spraying; and

Excludes: clearance of agricultural or horticultural crops, pasture, forest thinnings or coppicing, or any plant defined as a plant pest; or clearance of tracks for the use of foot traffic only; or any clearance for the purposes of a recognised river control scheme or any clearance for the normal maintenance of roads, railway lines and public utility networks; and includes clear felling of forest; and line clearance by bulldozer or similar machine for fences or planting. (Note: Maintenance of roads, railway lines and public utility networks includes the trimming of adjacent vegetation; but does not include vegetation clearance for new installation, roads, or access ways).

**Formatting in Definitions Chapter:**

- reclamation **“lake”** needs to be highlighted in **blue** as it is defined,
- retirement village complex — **“... buildings”** needs to be in **blue**, 
- **rural industry & aquaculture activities** need to be defined,  
- stormwater — **“water”** needs to be in **blue**, 

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- **wetland** needs blue highlighting to be consistent: as follows:
  includes permanently or intermittently wet areas, shallow **water**, and **land water** margins that support a natural ecosystem of plants and animals that are adapted to wet conditions.

**F-5 Draft Chapter Form Standard**

**Lettering and Numbering:**

**The use of NPS**

The abbreviation NPS is already in use in the resource management arena as it refers to National Policy Statements. Therefore the re-use of NPS in terms of the National Planning Standards will cause confusion rather than the clarity that the DNPS seek to achieve the following are suggested for consideration:

- "NWNPS" - Nation Wide Planning Standards, or
- "PS" - Planning Standards,
- "PSNZ - Planning Standards New Zealand
- "UNC" - Universal National Code,
- "NPR" - National Planning Requirements, or
- "NPM" - National Planning Model.

**The use of "P" and other single letter usage**

"P" for Permitted. This could also be confused with "P" for Port zone and even "P" for Prohibited. We suggest using a four letter nomenclature to be clear about which each "P" stands for so that we have for instance:

<table>
<thead>
<tr>
<th>Perm</th>
<th>Permitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Port</td>
<td>Port</td>
</tr>
<tr>
<td>ProH</td>
<td>Prohibited</td>
</tr>
</tbody>
</table>

The same comment applies to the use of other single letters.
F-2: Draft Mapping Standard

The proposed Colour Palette presents some issues:

- The Yellow colouring proposed for the “Low-density Residential zone”, “Residential zone”, Rural Residential zone” and “Rural settlement” are too close in colour to easily distinguish each zone.
- Some colours will fade into the background.
- The use of only one grey colour for the range of Special Zones would also confuse rather than clearly identify each Special zone for anyone using the plan.
- Any changes to the colour palette should avoid the use of different intensities of stippling as such would also confuse.
- If a Mining zone is to be included perhaps this could be a brown colour.
- If a Forestry zone is to be included perhaps this could be of a dark Lincoln green colour.
- If a Coastal; Zone is provided the corresponding colour palette should be deep blue.
- The Symbology Table proposes to show designations with a medium blue outline. This colour would be impractical as it would fade into a digital background. Also a blue colour is usually associated with water / the coast so that its use to delineate designations could lead to confusion.
- Has the colour palette been reviewed to avoid difficulties for colour blindness?