



# Draft first set of National Planning Standards

## SUBMISSION FORM

The Government is seeking views on the draft first set of National Planning Standards.

For more information about the Government's proposals read our National planning standards consultation document available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>.

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

## Making a submission

You can provide feedback in three ways:

1. Use the online submission form available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>. This is our preferred way to receive submissions.
2. Complete this submission form and send it to us by email or post.
3. Write your own submission and send it to us by email or post.

## Publishing and releasing submissions

All or part of any written submission (including names of submitters) will be published on the Ministry for the Environment's website [www.mfe.govt.nz](http://www.mfe.govt.nz). Unless you clearly specify otherwise in your submission, we will consider that you have consented both your submission and your name being posted to the Ministry's website.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment. Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions under the Official Information Act.

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# Submission form

The questions below are a guide only and all comments are welcome. You do not have to answer all of the questions. To ensure your point of view is clearly understood, please explain your rationale and provide supporting evidence where appropriate. The structure of this form is in line with the draft first set of national planning standards as shown in the overview section tables 1 and 2.

## Contact information

Name*	[Redacted]	
Organisation (if applicable)	Upper Hutt City Council	
Address	[Redacted]	
Phone	[Redacted]	
Email*	[Redacted]	
Submitter type*	Individual	<input type="checkbox"/>
	NGO	<input type="checkbox"/>
	Business / Industry	<input type="checkbox"/>
	Local government	<input checked="" type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/> <a href="#">Click here to enter text.</a>

\* 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 UHCC is supportive of the broad overall objectives of the National planning standards, these are likely to come at a significant cost – at least in the short term. UHCC is a small-medium sized council. The UHCC planning department has been resourced in staffing and operational budget to maintain the UHDP on a rolling review cycle over a ten year period. The reality of the national planning standards is that the only way for these to be implemented without significantly compromising the integrity of the District Plan is to switch to a full plan review. However, the additional operational budget and staffing levels which would be required to resource a full plan review are, for us, unaffordable and unacceptable for our community. UHCC does not believe it is alone in this challenge.

Given the significant costs and resourcing issues associated with a full plan review, UHCC will, if

necessary, proceed with a rolling review of the UHDP even as the National Planning Standards are implemented. However, while this allows us to manage the financial costs of the implementation largely within UHCC's existing resourcing, it creates other issues with the UHDP. The specific issues are touched on more in the details of our submission, but the reality is that implementing the definitions standard in a plan under a rolling review leads to the risk of broken rules that no longer achieve the outcomes sought by the plan (and the Upper Hutt community), as UHCC will not be able to review all our existing rules to ensure they function with the new set of definitions that are being introduced. UHCC has taken a pragmatic approach to mitigate these risks as best we can by focusing on reviewing the residential and rural chapters of our plan within the prescribed timeframes – as these are the most frequently used sections of our plan. However, that will still leave rules within large sections of our plan which will be out of line with the definitions that will need to be applied. The community will then have to contend with a plan that makes less sense and is less able to achieve the desired outcomes until these issues are resolved through the rolling review cycle. The exercise will result, at least in the short to medium term, in a plan that has significant sections that are less fit for purpose until the full plan has been reviewed within its ten year cycle.

There is a question as to whether the costs for our community and UHCC would truly be outweighed by the benefits of the National Planning Standards. While the benefits of plan clarity and consistency are laudable, and something UHCC certainly strive for throughout our work on the District Plan, those benefits are likely to accrue to a relatively select group of developers and/or infrastructure providers who work on a regional or national basis. However, our ratepayers in general are infrequent users of our District Plan – and even less likely to have to refer to any other District Plans. Many will never need to refer to our plan, and more still may only look to it once or twice while building or renovating their home. As such there is next to no benefit to the vast majority of our community of having consistency across plans in New Zealand. Yet it is UHCC ratepayers who will bear the cost of these changes, whether those costs are financial or in terms of plan quality and our ability to achieve outcomes. This is not an acceptable situation for UHCC. That said, the key area where UHCC does see value for our community is in the shift to e-planning, which is likely to enhance the accessibility of plans even for the infrequent user, and as such this is a part of the package that UHCC supports.

UHCC accepts that in the long term there may be internal benefits that reduce the cost of plan changes through providing a level of plan content that is not able to be further contested or appealed at the local level, however, this benefit seems small and distant when compared to the large up-front costs of implementation. And with the prospect of large-scale RMA reform on the horizon (as proposed by the 2017 Better Urban Planning report by the Productivity Commission), these benefits may never eventuate.

## 2. S-RPS: Regional policy statement structure standard

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- a. Parts 3 and 4 – Core policy statement provisions

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- b. Part 5 – Evaluation and Monitoring

[Click here to enter text.](#)

### 3. S-RP: Regional plan structure standard

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

[Click here to enter text.](#)

- b. Part 6 – Evaluation and Monitoring

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### 4. S-DP: District plan structure standard

The Upper Hutt City Council (UHCC) generally supports the proposed District Plan Structure Standard, with the following minor amendments.

**Location of definitions:** The proposal to locate the definitions within the Interpretation chapter could make interpreting the plan more difficult. While an e-plan format will make definitions easy to link to within the document, there may be instances where definitions need to be accessed independent of a hyperlink and a stand-alone chapter would make this easier.

**Relief Sought:** Amend position of Definitions to form a stand-alone chapter in Part 1.

**Order of District-Wide Matters:** While UHCC support the grouping of topics (e.g. Natural Environment Values and Community Values), it would be more logical to have the values chapters located together, rather than separated by the Environmental Risk chapter.

**Relief sought:** Amend the order of the chapters so that the Environmental Risk chapter is located either before the Natural Environment Values chapter or after the Community Values chapter.

### 5. S-CP: Combined plan structure standard

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

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

UHCC generally supports the overall proposed structure of the District Wide Matters standard, with the following amendment that the Natural Environment Values and the Community Values chapters are located together.

Relief Sought: Reorder chapter positions so that Natural Environment Values chapter and the Community Values chapter are located sequentially.

a. Natural Environment Values Chapter

There is no requirement within the S-NEV to cross reference to the schedules chapter, where there is a list of the specific location of areas and sites of significance. There are similar cross-referencing requirements in the Community Values chapter. It seems like a similar requirement would be useful for the S-NEV and would be a consistent approach across chapters.

Relief Sought: Insert a requirement into the Natural Environment Values Chapter (S-NEV) that where a schedule is used then there is an appropriate cross reference to the schedules chapter.

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

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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

UHCC supports the flexibility to include Special Purposes Zones. However, it is not clear whether all or only one of the three criteria (7a-c) must be met. The Upper Hutt District Plan (UHDP) has a number of special purpose zones. It is important that there are clear requirements to assist UHCC in determining whether additional special purpose zones can be utilised, or whether an alternative method needs to be considered.

Relief sought: Clarify the requirements for the establishment of Special Purposes Zones.

d. Precincts chapter

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e. Development areas chapter

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f. Designations chapter

The proposed Designations Table 16 includes a row for conditions. However, there is also a requirement to include designation conditions as a schedule. This would result in duplication of content.

Relief Sought: Amend the proposed Designations chapter (S-DES) requirements to specify designations conditions are required to be laid out either in the table or in the schedule, not both.

11. S-SAM: Schedules, appendices and maps standard – Part 6 – Regional policy statements, Part 7 – Regional plans, Part 8 – District plans, Part 9 – Combined plans

UHCC supports the standardisation of schedules, but suggests that an additional column identifying the related Planning Map number would help with plan navigation, noting that this would be particularly useful in an e-plan format. The UHDP contains map reference information in schedules. Examples are the schedules for Notable Trees and Urban Tree

Groups. Flexibility to add additional columns to allow relevant information to be included in an easy to read way could also avoid a lot of information potentially being combined into the Site Type/Description of Values column, which could make it harder to interpret.

Relief Sought: Include an additional 'Related maps' column, and increase flexibility to add additional columns where required.

## 12. F-1: Electronic accessibility and functionality standard

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### a. Standard baseline requirements

Standards 11 & 12: The compiling of historic District Plan documentation is anticipated to be a time-consuming and resource-intensive exercise, with no real benefit to the plan user. For those councils conducting a rolling review of District Plan content, like UHCC, it will be difficult to resource given the already high workload of District Plan review and National Planning Standards implementation. Any historical information is able to be provided to individual users, on request.

Relief Sought: Provide greater clarity in requirements to provide historical District Plan documentation, restricting the scope to not include every previous Plan or Scheme. The requirement should also be updated allow 5 years to implement.

### b. Level 5 requirements

E-Plan Functionality Scale: The scale intervals accurately reflect the different types of plans currently in use and set an achievable level of functionality.

Relief Sought: None.

## 13. F-2: Mapping standard

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### a. Zone colour palette

The tone of yellow between low, medium, and residential zoning is too similar and could easily be confused. The same could also be said for the Open Space/Sport and activity recreation/conservation zones.

Relief Sought: Either use a different colour, or use hatching over a colour to differentiate between low to medium density areas, for example.

### b. Symbology

Overall, there are too many blue areas used across symbols - increasing the risk of areas being confused with one-another.

Relief Sought: Diversify the colours and fill of geometry polygons used.

Protected tree group symbol: This would be difficult to implement for District Plans with larger tree groups. UHCC undertook a Plan Change in 2016 which introduced

several hundred Urban Tree Groups to the District Plan, implemented as a polygon on District Plan Maps and Schedules (see Chapter 27A). This allowed for clear identification of protected areas. Proposed Standards provide no clear ability for Councils to choose otherwise. This could result in removal of some tree groups, by proxy, with individual symbols unable to correctly identify the complete extent of tree protection. This could re-litigate recently established planning provisions for UHCC and other councils.

Relief Sought: Symbol needs to be a polygon and a symbol to properly identify the complete extent. This could be a hatched overlay as not to confuse with zoning.

Heritage Area and heritage item symbols: The heritage area symbol is limiting in nature by not being able to distinguish between heritage areas and heritage orders. The colour used could also easily blend into any underlying aerial image. Similarly, the use of a single symbol only for a heritage item would limit the identification of the extent of a heritage item (and where relevant any identified heritage setting /surrounding to the heritage item).

Relief Sought: Add a hatched version of the polygon for heritage orders. Colour should be updated to be more vivid to stand out from any underlay, and once again could be hatched to avoid confusion. Provide for the use of a symbol and/or polygons for identifying heritage items and heritage settings.

Natural Hazard Polygon: The combination of four distinct natural hazards in one polygon does not allow communities, business, and/or insurers to evaluate the level of risks they may be exposed to. This combination could also result in the associated rule structure to be quite long and impractical. Hazards should be defined in line with GNS, MCDEM, and FENZ. RMA s6(h) & s106 require hazards to be evaluated, including the scale of the effect, therefore there should be an ability to map this graphically. Plan Change 42 to the UHDP recently introduced flood hazard extents and distinguished the various levels of hazard on hazard maps using different colours and/or treatments. The agglomeration of these levels of hazards would remove the ability to show hazard types and have significant implications on the planning policy tied to each hazard level and type. Proposed standards would therefore necessitate revisiting this plan change at a significant cost, based on the historic costs UHCC has already included for this plan change.

Relief Sought: Assign a different polygon type for each hazard, representative of standards set by GNS, MCDEM, and FENZ. Different colours/treatments should be available to denote the level of risk and show scale, and there should be a level of local discretion permissible to reflect localised hazard types.

Faultline Hazard: Faultlines are inherently difficult to define and have a tendency to influence a wide area either side of a faultline. Modern District Plans have responded to this by creating bands of varying widths, reflecting the level of certainty of location of the particular faultline. This is in line with practice standards from GNS and the recently-notified Kapiti Coast District Plan is an example of this. Using a single line does not allow for the nature of faultlines to be mapped in a manner which reflects the severity and extent of hazard.

Relief Sought: Change the line to a band with different colours to show how well

defined a fault may be. Should reflect best-practice standards from GNS.

Missing Mapping Tools: There is no description for how the likes of precincts or development areas would be mapped, or what symbology should be used.

Relief Sought: Extend mapping labels to provide direction on precincts and development areas.

Zoning names: Zones detailed in S-ASM do not align with those covered in F-2. Zones excluded are: Airport; Port; Hospital; Education; Stadium; Future urban; and, Maori Culture. The label used for 'Special Activity Zone' does not allow for multiple zones, being one colour.

Relief Sought: Extend labels to include missing zones and allow TA discretion for the labelling of Special Activity Zones.

#### 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**

[Click here to enter text.](#)

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**

The proposed National Planning Standards seeks to provide a standardised set of conditions for District Plans across the country. While the majority of these definitions appear to be

appropriate, several of the definitions would result in unintended consequences, including:

- a) triggering the need for unnecessary resource contents;
- b) the establishment of out of zone activities; and
- c) changes to established rule structures within District Plans.

Such outcomes would result in additional costs to the community (from triggering the need for resource consent applications), and costs to Council to have to undertake plan change reviews to stop the establishment of activities that are not appropriate in certain zones (but may become permitted activities as a result of some of the definition changes). The definitions that potentially create issues are identified below, along with a description of the issue and the relief sought.

Additionally, draft Standards are unclear on how resource consent applications should be evaluated once the final Standards have been released and District Plans have yet to give effect to Standards. It is likely that many councils in a rolling review cycle will be in this position and additional guidance from the Ministry should therefore be provided to assist decision making.

a. Individual definition

**Accessory Building:** The definition of accessory building requires the construction of the principal building first. However, it is not uncommon for accessory buildings such as garages to be constructed on vacant allotments to provide storage before the building of the principal building. Under this definition these garages would not be considered to be an accessory building, thereby triggering the need for consent.

**Relief Sought:** Amend the definition of an accessory building as follows: "means a detached building, the use of which is ancillary to the use of the principal buildings or activity on the same site, including any future principal building, but does not include any minor residential unit."

**Building:** The definition of building is very broad and captures structures such as dog kennels, play houses, and sheds from hardware stores. Most bulk and location rules in the District Plan relate to buildings, rather than structures. Given the broad definition of building, these bulk and location rules will now apply to structures that have no perceivable effect on the environment.

**Relief Sought:** Amend the definition so that there is a height and size requirement for structures to be considered buildings (for example they need to be greater than 10sq meters and over 2m in height to be considered a building). This limit should relate to a threshold where buildings have an effect on the environment.

**Commercial Activity:** The definition of commercial activities is very broad and includes the trading of goods. Traditionally, many District Plans limit commercial activities to the provision of services. The purpose of this limitation is to allow for commercial activities to establish in business/industrial areas, without unintentionally allowing for retail activities to be established, which may undermine the CBD, or detract from commercial areas. The proposed definition would allow for the establishment of retail activities in these business/industrial areas, thereby resulting in unintended planning outcomes.

**Relief Sought:** Remove the term trading of goods from the definition of commercial

activities, and/or add a new definition for retail activities which does not overlap with the definition of commercial activities.

**Community Activity:** The definition of a community activity is very broad, but is reliant on the activity being a 'non-profit facility'. Many councils provide a number of community venues through council owned enterprises (e.g. museums, swimming pools, community halls, etc.). These facilities are often commercial in nature, requiring a charge for use or services provided, but are heavily subsidised by councils themselves. While their main purpose is not profit-driven, there may be instances where a profit is made. The draft definition for Community Activity would therefore exclude such activities from being a community activity, resulting in adverse planning outcomes.

**Relief Sought:** Either remove the "non-profit" component from the definition of Community Activities, or provide a definition for community activities that do generate profits (for example using the term Places of Assembly).

**Footprint:** The definition of footprint links back to the definition of structures. Under many District Plans, the footprint of a building is used to determine the site coverage of a structure. However, District Plans often exclude eaves that are less than 0.6m in depth as they do not result in building bulk.

Under the proposed definition, eaves would not be excluded from the calculation of a building footprint (as the definition of structures includes roofs), thereby changing significantly how site coverage is calculated (and potentially resulting in an increase in consent applications as a result. Established practice for many councils would be changed and this would take time to move through the industry, thereby meaning that many dwellings would be designed to a site coverage based on the footprint of a building, excluding eaves).

**Relief Sought:** Either amend the definition of footprint so that eaves less than 0.6m in depth are excluded from the calculation, or amend the definition of structures so that eaves less than 0.6m deep are excluded.

**Ground Level:** The definition of ground level is broken up into three tests. In terms of the first test, it is common for the ground level of the site to be determined by the level of the ground at the time of subdivision. However, the first test takes this further and excludes any excavation or filling associated with the construction of dwellings. This component of the test overly complicates the definition, especially in relation to flood hazard areas. If a party was to apply for a subdivision and land use together, then ground level would be determined by what activity was undertaken first. For example, if the applicant was to undertake a subdivision first, and was to fill the site to ensure the ground level was above the flood level, then the ground level at the time of the title would be the filled level. However, if the applicant constructed a dwelling on a filled platform, and then subdivided the site, the fill level would not represent ground level (even though the outcome is the same and is related to the timing of the subdivision). This creates a difficulty with the definition and could result in unintended internal non-compliances and complications when trying to determine the ground level of a site.

**Relief Sought:** Simplify the first test of the definition by removing the following: "...but excludes any excavation or filling associated with the construction or

alteration of a building". This change would mean that the ground level would simply be the level of the site when section 224C approval is obtained. This would also make the determination of heights and recession planes simpler for future dwelling constructions.

**Home Business:** The proposed definition of home business is broad and allows for the establishment of a wide range of activities. Many District Plans require an occupant of the dwelling to be employed in the business, in order for the activity to fall under the definition of a home business (this requirement prevents the proliferation of non-residential activities in the residential zone). While it is acknowledged that this requirement could be a Permitted Activity Standard, it would be simpler if the definition of a home business included the requirement for the resident(s) of the dwelling to be the business operator.

**Relief Sought:** Amend the definition of home business to as follows: "means an occupation, craft, service or profession, which is secondary to the use of the site for a residential activity, where a resident of the dwelling is the business operator."

**Minor Residential Unit:** It seems the definition of Minor Residential Unit is intended to provide for housing extended families. The definition however is broad and would allow for additional houses to be established on a site under the pretence of it being a minor residential unit. If the intent is to provide this housing choice for family members, then the definition should reflect this.

**Relief Sought:** Amend the definition so that it directly references that this housing typology is intended to house family members on the same site.

**Quarry:** The definition of a quarry is overly broad and captures all areas of excavation. As a result, all earthworks that involve excavation could accidentally be considered to be a quarrying activity, thereby created unnecessary consents. This issue could be addressed through a small change to the definition.

**Relief Sought:** Amend the definition of quarrying as follows: "means an area of land where the excavation, with or without the processing of minerals and other solid natural substances, is intended to generate a profit."

**Structure:** The definition of a structure is broad and would capture items such as trailers, fences, low level retaining walls, boats, and caravans. As a result, if one of these items is located too close to the boundary, technically there would be a structure within a yard setback (such as the 1.5m side yard setback requirement that UHDP has). The resulting unintended outcome could be the need for resource consent applications to ensure that these activities meet yard setback requirements. Many District Plans specifically exclude items of this nature (or set height limits) to ensure that these items do not trigger the need for resource consent.

**Relief Sought:** Amend the definition to ensure that items that could reasonably be expected to be located on or close to a boundary are not captured by the proposed definition of a structure.

b. Additional definitions

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

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### a. Technical support

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## 20. Implementation

UHCC reviews its District Plan on a rolling review cycle. A shift to a full plan review is not feasible for UHCC as the costs and resourcing requirements would be prohibitive. However, the requirement to update all definitions as part of the initial roll-out of the National Planning Standards will create significant issues for our plan and the functioning of the rules in sections that have not yet been reviewed. While UHCC plan to review the most significant sections of our plan in time to accommodate these new definitions (e.g. our residential and rural chapters) we will still be left with significant sections of the plan that will either: a) have broken rules that will not function as intended as a result of changes to the definitions, or b) have to maintain the old definitions for these sections of our plan until such time as the outstanding chapters can be reviewed. Obviously neither of these situations is desirable and both outcomes reduce the usability of the District Plan by our community and have the potential to create significant confusions, complications and possible costs to the Council and the community.

Relief Sought: UHCC seek further direction from MFE on how the standards can best be implemented within a rolling review cycle. UHCC appreciate that a full plan review may be the simplest way to implement the National Planning Standards; however this is not a feasible option for us.

### a. ePlanning implementation

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### b. Timing

The National Planning Standards set a timeframe of 5 years for UHCC to implement the standards. This timeframe is going to put significant strain on the Council as the policy team is small and is in the process of undertaking a rolling review of the plan. Due to the changes proposed under the National Planning Standards, there is going to need to be a significant rewrite of existing objectives, policies and rules to make sure that the proposed changes do not result in unintended consequences. Such changes may be challenged by the public, thereby slowing the implementation process. Furthermore, UHCC has been undertaking its rolling review for several years. If UHCC was to implement the proposed National Planning Standards, it possibly would be reopening recent contentious plan changes to re-litigation before the ten year review period as stipulated in the Act (for example the recent Plan Change 42 for Flood Hazards). Such an outcome would result in undue costs on UHCC, and uncertainty for plan users and the community.

To address these issues, UHCC proposes the following split timeframe.

- For Chapters that have not been reviewed within the 3 years prior to the

National Planning Standards being gazetted, then the Council has 7 years to implement the standards

- For Chapters that have been reviewed within the 3 years prior to the National Planning Standards being gazetted, then the Council has 10 years to implement the standards

This timing would bring the implementation of the standards more in line with the RMA 10 year review cycle and would assist with addressing the costs of reopening recently completed plan changes.

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](mailto: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.**