

# 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.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

## 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)	Synlait Milk Ltd
Address	[REDACTED]
Phone	[REDACTED]
Email*	[REDACTED]

Submitter type*	Individual	<input type="checkbox"/>
	NGO	<input type="checkbox"/>
	Business / Industry	<input checked="" type="checkbox"/>
	Local government	<input type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/>

[Click here to enter text.](#)

\* 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

[Click here to enter text.](#)

2. S-RPS: Regional policy statement structure standard

[Click here to enter text.](#)

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

[Click here to enter text.](#)

- 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**

[Click here to enter text.](#)

- b. **Part 6 – Evaluation and Monitoring**

[Click here to enter text.](#)

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

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

[Click here to enter text.](#)

**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

[Click here to enter text.](#)

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

[Click here to enter text.](#)

- a. Natural Environment Values Chapter  
[Click here to enter text.](#)
- 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  
[Click here to enter text.](#)

10. S-ASM: Draft area specific matters standard – Part 5 of District plans, Part 6 – Combined plans

- a. Zone framework (individual and range)

Rural Zones

Synlait Milk is concerned that the zone options identified in the Draft National

Planning Standards for the rural area are too broadly defined. In particular:  
There are only two options for rural zones. These are:

Rural Zone: The purpose of the Rural Zone is to provide primarily for primary production activities. The zone may also provide for a limited range of activities which support rural production.

The term “a limited range of activities which support rural production” is ambiguous. It is unclear what land uses would fall within a “limited range of activities” and if this may include rural industrial activities.

Rural industry is defined to mean “an industrial activity where the principal function supports primary production or aquaculture activities” and on this basis it is assumed that dairy processing activities would fall within the purpose of the Rural Zone as they support rural production. Dairy processing plants are however typically large-scaled industrial sites and the lack of guidance within the zone description creates uncertainty.

The Rural Production Zone is to prioritise primary production activities that rely on the productive nature of the soils, intensive primary production, and also providing for associated rural industry.

It is unclear how the Rural Production Zone is to be distinguished from the Rural Zone as all primary industry activities rely on the productive characteristics of the soil to some degree. The term “primary production” is used in both the Rural and Rural Production Zones and is defined as being:

- a) agricultural, pastoral, horticultural, forestry or aquaculture activities for the purpose of commercial gain or exchange.
- b) land and auxiliary buildings used for the production of products that result from the listed activities; but
- c) does not include processing of these products.

The definition of Rural Production Zone requires that the Zone prioritise primary production but may also provide for associated rural industry. It is unclear however if this Zone is intended to be used for rural industries which are often at a very large scale, highly industrial in appearance and occupy sites where there is no or limited primary production being undertaken.

Experience over a period of many decades has demonstrated that sites, such as dairy processing plants, require objectives, policies and rules which are distinctive from the general rural area to enable the scale and intensity of processing activity required for export, and to protect significant capital investment from reverse sensitivity effects. It is also appropriate to acknowledge that some rural industries require a rural location, due to the extent of land required (including for management of air and wastewater discharges), the need to be close to rural suppliers and to limit transportation costs and inefficiencies in any processing.

The appropriate level of environmental management for a dairy processing plant is therefore potentially ineffective without a higher level of specificity in the zone options.

For this reason, Synlait supports the creation of a Rural Industry Zone. This would link

to the definition of Rural Industry already provided for within the National Planning Standards. It also creates the opportunity for the development of provisions which are more effective at managing the scale and range of effects that are associated with large-scale rural activity, and which experience has demonstrated is of such significance that separate provisions from a general rural zone are required.

Synlait would like to suggest that a working group is set up, partnering MfE with nationally significant and large scaled rural industries to develop provisions for a Rural Industry Zone. Synlait would welcome the opportunity to contribute to this forum.

In summary, the Draft National Planning Standards only provide for two rural zone options, both of which lack specificity with respect to rural industry and potentially limit the effectiveness of planning provisions to effectively enable and manage rural processing industries across New Zealand.

Synlait seeks the addition of a Rural Industrial Zone to provide an appropriate method for identifying, managing and protecting the significant physical resources associated with dairying and other similar scaled rural industries.

b. Purpose statements

[Click here to enter text.](#)

c. Additional special purpose zones and criteria

Special Purpose Education Zones

The Special Purpose Education Zone provides for educational facilities. This is defined to mean:

- (a) the use of land or building for the primary purpose of regular teaching or training in accordance with a pre-set syllabus by suitably qualified or experienced instructors, but
- (b) but does not include any industrial activity.

The purpose of this zone is too narrow and fails to account for the much broader role and function of tertiary institutions who are involved in research and development. Synlait seeks that the Special Purpose Education Zone is amended to include the broad range of functions and activities associated with tertiary education providers, and in particular include research and development for industry and commercial purposes.

d. Precincts chapter

[Click here to enter text.](#)

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**

Synlait submits that it is administratively inefficient to locate all appendices in an Appendices Chapter and that appendices are more conveniently located at the end of each chapter to which they apply.

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

[Click here to enter text.](#)

**a. Standard baseline requirements**

[Click here to enter text.](#)

**b. Level 5 requirements**

[Click here to enter text.](#)

**13. F-2: Mapping standard**

[Click here to enter text.](#)

**a. Zone colour palette**

[Click here to enter text.](#)

**b. Symbology**

[Click here to enter text.](#)

**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

The spatial planning tools available for district plans are too limited with respect to rural industrial activities as noted below:

Zones: As discussed above, there are only two options available for rural environments, being the Rural Zone and the Rural Production Zone, neither of which provide an appropriate level of recognition for rural industrial activities, such as dairy processing.

Overlays are more appropriate to district wide matters such as landscape or natural hazards, and not to rural industrial sites.

Precincts are an urban construct which do not “fit” a rural environment and large, scale rural industrial activities.

Specific controls are not intended to apply to a rural industrial activity which requires its own objectives, policies and rules.

Development areas appear to be intended for urban expansion.

Synlait submits that the lack of appropriate options for spatial planning tools for dairy processing activities within rural zones further supports the need to add a Rural Industrial Zone.

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**

[Click here to enter text.](#)

f. **Development areas**

[Click here to enter text.](#)

g. **Designation**



## 16. F-5: Chapter Form standard

Click here to enter text.

### 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

Click here to enter text.

### a. Status of rules and other text

Click here to enter text.

### b. Numbering

Click here to enter text.

## 18. CM-1: Definitions standard

Synlait supports and/or seeks amendments to the following definitions.

### a. Functional Need: Support

### b. Habitable Room: Support

### c. Notional Boundary: Support

### d. Reverse Sensitivity: Support

### e. Rural Industry: Support

### f. Earthworks:

The definition of earthworks has minimal content and cross-references to the fuller definition of land disturbance. This cross-referencing to a less commonly used term is confusing and does not accord with the intent of the Draft Planning Standards to encourage easily navigated provisions. It would seem more appropriate to use the definition of Earthworks as the primary explanation of the activity, noting that the Draft Planning Standards require an Earthworks Chapter.

### g. Educational Facility:

The proposed definition is limited and does not provide for the broad range of functions and activities associated with tertiary education providers, such as research and development.

- h. Primary production: Replace with word “auxillary” with “accessory”. It is unclear what “auxillary buildings” include and to what scale.
- i. Sewage : The definition of sewage includes water from industrial or commercial processes. Whilst technically correct, water from industrial or commercial processes is more commonly referred to throughout New Zealand as trade wastewater. This includes within district and regional plans, and in Local Government processes such as building consents. The reference to trade wastewater under sewage lacks easy identification and is not consistent with the intent of the Draft Planning Standards to have easily navigated provisions. The preference would be to include “trade wastewater” under the definition of wastewater.

j. Additional definitions

Sensitive Activity: Synlait seeks the addition of a definition for “sensitive activity” to provide certainty for all parties as to the types of activities that are vulnerable to noise, air discharge or other environmental effects. This definition would complement the definition of reverse sensitivity, providing more effective management of reverse sensitivity effects.

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

[Click here to enter text.](#)

a. Technical support

[Click here to enter text.](#)

## 20. Implementation

[Click here to enter text.](#)

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

[Click here to enter text.](#)

f. District plan spatial planning tools and zone framework guidance

Click here to enter text.

- g. Regional plan and policy statement spatial tools guidance

Click here to enter text.

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

Click here to enter text.

- i. Additional guidance materials required

Click here to enter text.

## 21. Future content for standards

Click here to enter text.

- a. Utilities provisions

Click here to enter text.

## Other comments

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

Click here to enter text.

## 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.**