

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. 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)	[Redacted]	
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"/>

[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?

- Qualified Yes (if significant resourcing provided)
- No

Rotorua Lakes Council supports the National Planning Standards on the condition that significant resourcing is provided for implementation.

The Council supports the objectives of the standard and is positive about the benefits that could be realised. However, the Council is also cognisant of the enormity of the task of implementing the standards and the drain it will put on planning resources.

Government should consider the national planning standards a project of national significance and resource it as such. The Council also emphasises that the benefits are national with costs unlikely to outweigh benefits in small and regional centres. This reinforces the need for national resourcing.

If sufficient resources cannot be provided to assist local authorities then timeframes should be extended to allow Councils to align substantive changes with plan review and reduce costs.

The Council welcomes the opportunity to be further involved as a test case if resources are provided to assist with implementation of the standards.

2. S-RPS: Regional policy statement structure standard

Rotorua Lakes Council has focused its attention on district plan standards and has no comments on this standard.

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

Rotorua Lakes Council has focused its attention on district plan standards and has no comments on this standard.

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

The Rotorua District Plan, at a high level, has a reasonable level of consistency with the District plan structure standard. That is, it has a section addressing strategic directions; both topic (district wide) and zone chapters; and rules placed in the same chapters as objectives and policies.

However, at the provision level, significant work is needed to address the structure standard, for example:

- relocating topic-based provisions (e.g. hazards, cultural heritage rules) and general controls (e.g. signs) from zone chapters to their own district-wide chapters.
- integrating the Lakes A Zone provisions, which is written differently (effects based) and reads as a separate plan, into the same structure as the rest of the plan.

- shifting provisions from appendices to the core plan (for example earthworks standards and standards to address section 6 of the Act)
- ungrouping policies with relevant objectives
- finding a 'home' for provisions addressing iwi economic resources that do not appear consistent with either zone chapters or the Tangata Whenua Structure Standard.
- integrating the part of our plan that addresses section 6 of the Act into either district-wide matters or Part 3 Strategic Directions.

Given the age of the Rotorua District Plan these changes would occur ahead of the review of the majority of the plan to meet the proposed implementation timeframes. This will add cost to our community and consume a substantial amount of our limited planning resources. Nonetheless, the Council supports the standard, as it recognises that implementing the structure standard would achieve a large increase in national consistency.

In terms of detail, the Council is unclear as to where esplanade reserve provisions should be located. The Council is also unclear as to the process that must be used to undertake the relocation of content into Part 3 that does not sit in a strategic-directions section of a current district plan.

Rotorua Lakes Council seeks:

- Clarification of whether the rehousing and 'elevation' of provisions that currently sit outside our existing strategic directions chapter into Part 3 Strategic Directions would require a Schedule 1 process (discussed further in the Strategic Directions Standard)
- Clarification of where to locate esplanade reserve provisions.

5. S-CP: Combined plan structure standard

Rotorua Lakes Council has focused its attention on district plan standards and has no comments on this standard.

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

Rotorua Lakes Council considers the tangata whenua structures standard should be removed as it provides no environmental benefit, will leave councils open to challenge and requires significant resourcing to populate.

It is noted that the content envisaged is not 'core' plan provisions in terms of section 35(2) (issues, objectives, policies, methods, rules, ERAs, monitoring and information to be included in resource consents that requires a plan change). This raises questions as to whether the development new content and maintenance of content for Part 2 would require a Schedule 1 process – some argue that non-core provisions outside of s75(2) do not require a plan change.

Rotorua Lakes Council is also unclear as to whether existing objectives and policies addressing decision-making can be located in the Tangata Whenua chapter, as there is no mention of objectives and policies.

The Council also notes that the chapter outline is not consistent with instruction 3 of the Chapter Form standard, which instructs the part to follow a more usual chapter outline.

Rotorua Lakes Council seeks:

- removal of the Tangata whenua structure standard (there would, however, need to be a place in the standardised plan for our existing objectives and policies addressing decision making to be located).

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

No specific mention of the use of te reo was found in the standard.

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

The Rotorua District Plan contains a chapter titled 'Matters of National and Strategic Importance', which generally aligns with the Draft Strategic Directions Standard.

However, the Council is unclear as to whether a Schedule 1 process must be used to 'elevate' provisions that do not currently sit within a strategic-direction-type part of a District Plan into Part 3. This is particularly important for those territorial authorities that do not already have such a section in their plan. In the case of Rotorua, the question potentially arises in relation to the

rehousing of objectives and policies from our current Iwi Cultural and Historic Heritage and Economic Resources chapter.

The Council is also unclear as to the effect of the last bullet point in instruction 3. Would it require all objectives and policies relating to implementation of Maori resource management provisions in Part 2 of the RMA to be located in the strategic direction chapter? For example, would it require wahi tapu objectives and policies (but not rules) to be located in the strategic direction chapter, as opposed to the Community Values chapter (as these provisions give effect to section 6 (f))? This appears inconsistent with the District Wide Matters Standard.

Rotorua Lakes Council seeks:

- Clarification of the process used to 'elevate' provisions that do not currently sit within a strategic-direction-type part of a District Plan.
- Clarification of the last bullet point in instruction 3.

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

Rotorua Lakes Council's submission on the District Wide Matters Standard is similar to that for the District Plan Structure Standard. That is, the Council notes it will need to undertake significant work to align the District Plan with the standard. The Council is supportive for the reasons of national consistency, provided that significant assistance is provided.

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

[Click here to enter text.](#)

a. Zone framework (individual and range)

The Rotorua District Plan, no doubt like many other district plans, would require a consolidation of zones combined with the creation of new precincts and overlays to retain the intent of the current plan while achieving consistency with the draft zone

framework. This will be a complex process and must be undertaken ahead of review of the majority of the plan (which is not due to commence until 2026).

The Council also notes the complexity it will face integrating the effects-based Lakes A zone provisions with the remainder of the Rotorua District Plan to achieve the required district plan structure and limited number of zones. The national planning standards are likely to drive a reduction in the uniqueness of provisions for this special environment.

The Council remains positive about the task ahead but questions whether the direction to align zones to a standard set needs to be drafted as a discretionary direction. The Schedule 1 process will add significant costs and may raise expectations of stakeholders for substantive review of zones. Independent peer review is suggested as an option to provide confidence to the Council and stakeholders that the alignment has occurred correctly where no Schedule 1 process is used.

The Council is also unclear, from the text of the standards and legislation, the process that must be used to create the additional precincts and overlays to retain plan intent in the situation that changes to implement the standard are made ahead of plan review. The wording of 581(4)(d) (consequential changes) does not appear broad enough to encompass this work.

Rotorua Lakes Council seeks:

- Redrafting of the national planning standards to avoid the Schedule 1 process for aligning zones – at least where the original intent of the plan is retained.
- Consideration of a non-statutory central government peer review of whether changes are consistent with the original intent and standards (where Schedule 1 process is avoided).
- Clarification of the process used to create precincts and overlays to retain plan intent while aligning zones.

b. Purpose statements

Rotorua Lakes Council notes an issue with the purpose statement for the Mixed-use zone. The current wording can be read as requiring that the zone provide for all of residential, commercial, light industrial, recreational and community activities; but our mixed-use type zones do not provide for light industrial activities.

Rotorua Lakes Council seeks review of the purpose statement for the Mixed-use zone.

c. Additional special purpose zones and criteria

The Rotorua District Plan will require a special purpose zone for water. The Council notes special local context of Te Arawa ownership of the lakebeds and high recreational values.

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

[Click here to enter text.](#)

12. F-1: Electronic accessibility and functionality standard

[Click here to enter text.](#)

a. Standard baseline requirements

Rotorua Lakes Council supports some of the requirements and considers they provide clarity around fundamental expectations (such as key word search functionality, tabulation (bookmarking) of sections for easier navigation and distinguishing plan-types in combined plans).

However, the Council opposes instructions 7 and 11.

Instruction 7 – It would be a large task to identify all rules in the plan that require notes to refer to other plans; and it would be difficult to keep this information up-to-date. Limited planning resources are better spent on other tasks.

Instruction 11 – The requirement to provide all versions of the current plan since first becoming operative on the website (while also fulfilling the requirement to show the legal status of provisions) would mean at least 6 versions of a plan must be available for every plan change: notification version, post-submissions version showing rules treated operative because there are no submissions, post-decisions version showing changes made in response to submissions, post-appeal period version showing further provisions treated as operative, post-consent order/Environment Court decisions (perhaps several) and operative version. If plan changes overlap in time this creates further complexity and plan versions. It is impractical for Councils using pdf files to provide all these versions on their website.

The Council also believes instructions 10 and 15 overlap in relation to the legal status of provisions.

Rotorua Lakes Council seeks:

- removal of requirement 7
- delay of the requirement to display all versions of the current plan until implementation of an e-Plan
- review of instructions 10 and 15.

b. Level 5 requirements

Rotorua Lakes Council suggests consideration is given to what record keeping and functionality is required in relation to the historic map changes for e-Plans.

13. F-2: Mapping standard

Rotorua Lakes Council has had limited time to consider the draft mapping standard. In principle, it supports the concept of standardised mapping colours and symbology but considers that further work is needed.

a. Zone colour palette

The bold colours of the draft colour scheme are not appropriate for hard-copy maps. Hard copy maps layer zones and overlays on top of each other, potentially with underlying aerial photography or topographic maps for context. Pastel colours with transparency work better.

b. Symbology

One type of polygon is not appropriate for hazards. There is a need to show different types (and potentially overlapping) hazard overlays.

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

Rotorua Lakes Council has focused its attention on district plan standards and has no comments on this standard.

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

The term precinct has an urban connotation. Consideration could be given to an alternative term that also encompasses other types of environment.

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

The Rotorua District Plan contains substantial sections in each chapter on methods of assessment of discretionary and non-complying activities (that is, assessment criteria for such activities). The Council seeks clarification of whether the intended effect of the Chapter Form standard is to preclude this content (the standard states that chapters within Part 2 – Tangata Whenua, Part 3 – District-Wide Matters and Part 4- Area-Specific Matters must use the order of headings below but arguably it could be possible to include assessment criteria under the Rules heading). The Council is also unclear as to whether a Schedule 1 plan change would be required to delete the assessment criteria.

The Council also notes that instruction 3, which instructs the headings for chapters within Part 2, is not consistent with the content of the chapters identified in the Tangata Whenua Structure Standard. The Council is unclear as to whether the effect of both standards is to allow objectives, policies and rules in the Tangata Whenua Structure Standard, or not.

Rotorua Council seeks:

- Clarification of whether assessment criteria for discretionary and non-complying

activities must be deleted the process to delete these if required.

- Review of the Tangata Whenua Structure Standard.

b. Rules

[Click here to enter text.](#)

c. Rule tables

Rotorua Lakes Council understands that to achieve the objective of increased national consistency rules are critical. It is often the rules that are the focus of plan users. However, the Council questions whether sufficient testing has occurred to ensure the draft format provides an appropriate level of prescriptiveness versus adaptability to different types of rules.

The Council has only briefly considered the draft format but considers it would increase repetition because a row does not allow for different activity status in different zones (refer to Appendix One for a comparison of the Rotorua District Plan current rule tables and the proposed format). The proposed format appears most suited to rules grouped by individual zone or other spatial planning tool.

The Council supports a standard rule format (even if it might result in repetition) if the rule format has been extensively tested and the Ministry is confident of the layout. The Ministry should not rely merely on feedback received through this submission process, as it is considered unlikely that submitters have had time to test the format extensively.

The Council also suggests that retrofitting a standard rule format in plans that have not been written for this format may create unforeseen issues and greater difficulties for users. Implementation of standard rule formats is therefore one area that could be delayed by several years to allow local authorities greater opportunities to align with plan review (and to therefore write rules for the standard format from the start and avoid retrofitting).

Note – it is unclear from the rule table whether matters of control or discretion can be listed underneath the table (similar to the option provided for rule requirements).

Rotorua Lakes Council seeks:

- Extensive testing by the Ministry before any standard rule format is adopted
- Clarification of whether matters of control or discretion can be listed or put in a table below the rules to avoid repetition.

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

Rotorua Lakes Council has not had time to consider this standard and has no comments at this stage.

a. Status of rules and other text

[Click here to enter text.](#)

b. Numbering

[Click here to enter text.](#)

18. CM-1: Definitions standard

Due to resourcing constraints, Rotorua Lakes Council cannot provide comments on the detail of the proposed definitions.

The Council does note that clarity is needed around the process for aligning definitions. The legislation appears to allow a local authority to merely adopt a definition without dealing with the fact that the meaning of the plan has changed and without a Schedule 1 process. Changes to rules or performance standards to retain the original intent of the plan appear optional and require a Schedule 1 process because they are not strictly needed to avoid duplication or conflict with the amendments required (in terms of section 58(3)).

However, this is the opposite to how some planners interpret the standards and legislation (or perhaps consider these should read). That is, consequential changes to retain the original plan intent should be made without Schedule 1 but changing the intent of the plan requires a Schedule 1 process.

Rotorua Lakes Council seeks:

- Clarification of the process to align definitions.

a. Individual definition

[Click here to enter text.](#)

b. Additional definitions

[Click here to enter text.](#)

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

Rotorua Lakes Council gives qualified support to the timeframes in the draft national planning standards. That is, on the proviso that the government provides significant support to local authorities to enable their implementation within five years.

This is not to say that the five year timeframe is convenient for this Council. Indeed,

review of the majority of the Rotorua District Plan is not due to commence until 2026. Notification of changes is not expected until later; well outside the five-year implementation timeframe in the standards. Costs for the Council are likely to be less (as acknowledged in the cost –benefit study) if more of the changes could be aligned with the review cycle.

We remain positive about the changes and creating a more user friendly document in the shorter term if support is provided to ensure this can happen. If significant support cannot be provided then Council seeks that timeframes for the more substantive standards and ePlan are extended. Eight years is suggested. This extended timeframe is still not sufficient to allow all changes to be made with plan review, without bringing review forward. However, it does provide a greater window for each local authority to plan and stage the changes.

Rotorua Lakes Council seeks:

- Adoption of the proposed timeframes on the proviso that significant resourcing is provided for implementation.

Alternatively, extension of the implementation timeframes for the following standards/requirements to eight years:

- Area Specific Matters Standard (zones component)
- Mapping standard
- Presentation of plans in a level 5 eplan format.
- Rule table component of the Chapter Form Standard
- Definitions standard

c. Support

Rotorua Lakes Council is positive about, but also daunted by, the national planning standards. The economic evaluation (Castalia Feb 2018) acknowledges implementation will require a large investment of 0.3 – 2.5 FTE over the 5-year implementation period. This comes at a time when the Council is trying to:

- enable growth in line with the National Policy Statement for Urban Development Capacity and the Rotorua Housing Accord through plan changes and special housing areas;
- carry out its own plan reviews for an area with significant values (Lakes A); and
- make changes required by other national direction (such as the National Environmental Standards for Plantation Forestry).

It is agreed that small councils require targeted support. However, assistance must also be extended to the regions, consistent with the government's regional development focus.

The Council employs just 1.6 FTEs and has modest operating budgets for its resource management policy (and this resourcing is now locked in for three years under the Long Term Plan). Government must find ways of reducing the council implementation costs if the standards are to be successful.

The Council also considers that the benefits of national consistency are unlikely to outweigh the costs when the Rotorua District is considered separately – this reinforces the need for national support.

Centralised support will also promote consistent implementation; the very purpose of the national standards.

Rotorua Lakes Council seeks that the following support is provided to all local authorities, with a greater level of support for provincial New Zealand:

- Grants for the start-up consultancy costs involved with developing ePlans.
- Grants for staff/consultancy costs developing the changes.
- Procurement of dedicated legal, planning, GIS and ePlanning services to provide free advice to each local authority (x hours per month per council).
- Optional peer review of changes drafted to give effect to the national planning standards
- Facilitation of peer networking to aid the sharing of knowledge and experience (e.g. with local events)
- That other options to reduce the costs and improve the efficiency of the transition to ePlans are explored and implemented. These may include, but are not limited to:
 - design specifications
 - assistance with joint procurement
 - research and development

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 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.

Appendix One:

Current Rotorua District Plan Rule Table Format (Zones Chapters)

	Zone a	Zone b	Zone c
General			
Catchall rule referring to permitted activities not meeting performance standards	RD	RD	RD
Generic heading 1 (e.g. Tourism and Recreation)			
Rule title w (e.g. Bed and Breakfast)	P	P	C
Rule title x (e.g. Holiday Parks)	D	D	NC
Generic heading 2 (e.g. Temporary Activities)			
Rule title y (e.g. temporary events)	P	P	P
Rule title z (e.g. motorised sporting events)	C	D	NC

Performance standards (for permitted and controlled activities)

[written as numbered text after table]

Controlled Activities: Methods of assessment

[numbered generic matters of control and matters of control for specific activities]

Restricted Discretionary Activities: Methods of assessment

[generic matters of control and matters of discretion for specific activities]

RDP Rules Reformatted to draft national planning standards:

Zone		
a and b zones	Rule title w Bed and Breakfast	
	Activity Status: P [Reference to rule requirements below]	Activity status when compliance not achieved: RD
c zone	Rule title w Bed and Breakfast	
	Activity Status: P [Reference to rule requirements below]	Activity status when compliance not achieved: RD
a and b zones	Rule title x Holiday Parks	
	Activity Status: D	
c zone	Rule title x Holiday Parks	
	Activity Status: NC	
a, b and c zones	Rule title y Temporary Events	
	Activity Status: P [Reference to rule requirements below]	Activity status when compliance not achieved: RD
a zone	Rule title z Motorised Sporting Events	
	Activity Status: C [Reference to rule requirements below]	Activity status when compliance not achieved: RD; Matters over which control reserved [reference to below?]
b zone	Rule title z Motorised Sporting Events	
	Activity Status: D [Reference to rule requirements below]	
c zone	Rule title z Motorised Sporting Events	
	Activity Status: NC [Reference to rule requirements below]	

Performance standards (for permitted and controlled activities)

[written as numbered text after table]

Controlled Activities: Methods of assessment

[generic matters of control and matters of control for specific activities]

Restricted Discretionary Activities: Methods of assessment

[generic matters of control and matters of discretion for specific activities]

Comments:

- Creates additional rows with repeated rules. This will look clumsy. Will look better without obvious repetition if group rules by zone, but this will create even more rows.