Draft first set of National Planning Standards

SUBMISSION FORM

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

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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

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<tr>
<th>Name*</th>
<th>The Chief Executive</th>
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Submitter type*

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

* Questions marked with an asterisk are mandatory.

Draft first set of National Planning Standards

1. Do you support the draft first set of National Planning Standards?
   - [X] Yes
   - [ ] No
Manawatu District Council’s (MDC) submission is focused on those draft Standards applicable to District Plans. MDC has a number of general comments on matters that concern more than one of the draft Standards. These comments are on the following topics:

- Guidance;
- Implementation resourcing;
- Implementation, training and effectiveness monitoring;
- Implementation timeframes
- The need for a cohesive template;
- Mandatory vs. discretionary directions;
- The role of s32 evaluations in plan making;
- Landscape, landforms and natural character;
- Private plan changes;
- The inclusion of locally derived content; and
- Incorporation of National content.

**Guidance:** The consultation document accompanying the Standards notes that ‘guidance alone is not sufficient to address variation problems’. It could also be argued that Standards alone will not be sufficient to address variation problems. Many of the observations in this submission identify specific roles for guidance in order to ensure that Councils are supported to implement the requirements of the draft Standards efficiently and effectively.

**Recommendations:**

- That MfE provide clear and concise guidance prior to or concurrently with the gazettal of the Standards;
- That guidance documents provide clear and concise worked and best practice examples that council planners can adopt and adapt for local circumstances;¹
- That MfE ensure best practice regarding implementation of the Standards is captured on an on-going basis, as Councils implement the standards over the 5-7 year period from gazettal.

**Implementation resourcing:** When considering all the Standards together, it is clear that the implementation of one Standard will result in consequential changes in other parts of a planning document, which will also need to be consistent with the relevant Standard. This will have resource implications, even for those district plans that are currently closely aligned with aspects of the draft Standards, and it may be difficult for Councils to accurately determine or forecast what the draw on resources will be of undertaking the work, until the implementation period commences.

**Recommendations:**

- The guidance documents being prepared by MfE to accompany the Standards should include guidance for Councils on the scheduling or staging of the implementation of Standards to ensure Councils can undertake this work as effectively and efficiently as possible; and
- That case studies or worked examples be included in the guidance documents to show how effective implementation can be achieved.

**Implementation, training and effectiveness monitoring:** MDC considers that proactive implementation, training, and effectiveness monitoring of the implementation of the Standards by

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¹ The National Environmental Standard for Assessing and Managing Contaminants in Soil Users’ Guide, section 5 Case Studies provides very useful worked examples which can be used or adapted by practitioners when determining the status of an activity under the NES.
MfE will be a critical factor to ensure the goals for standardisation are achieved, as set out by the Ministry in the s32 evaluation document (page 8).

Recommendation:

MDC considers there are a number of approaches that MfE should consider to assist Councils with implementation and effectiveness monitoring of the Standards, for example:

- The targeted provision of support to a grouping of smaller Councils within a region to ensure consistent implementation of the Standards, at the sub-regional level;
- Provision of a legal review service, prior to confirming a non-schedule 1 RMA implementation or prior to public notification for the introduction of amendments introduced alongside RMA Schedule 1 plan changes;
- Provision of regular workshops, training and review sessions with practitioners to ensure feedback on and learnings from implementation of the Standards can be captured, analysed and responded to in a timely manner, to benefit all Councils.

Implementation timeframes: As part of preparing this submission, MDC ran parts of the Operative Plan through the draft Standards to gauge the ‘distance’ between current plan content and the Standard. This exercise strongly indicated that the 5 year implementation timeframe will represent a resourcing challenge to MDC in terms time, staff and cost.

MDC is also aware that in some instances changes required to regional planning documents to incorporate the Standards could influence the timing of district plan changes. For example, MDC has a Rural plan change scheduled for notification in mid 2019. However, the One Plan has many ‘rural’ definitions which will require amendment to align with the Standards, with significant consequential changes to regional policy provisions anticipated, and which will have implications for district plans in the Horizons region. It may be more efficient for MDC and the wider community to wait for the One Plan to instigate the changes necessary to align the regional planning documents with the Standards before commencing with its Rural plan change. This could have implications for the MDC’s ability to develop and implement policy and provisions to proactively address issues in the rural environment and ensure the delivery of appropriate environmental outcomes.

Pressure on Council resources to deliver the Standards will be intensified if MfE implementation guidance is incomplete or vague, and if efforts are not made to enable collaboration between Councils to help identify efficiencies and share learnings. MDC also strongly recommends that in considering submissions made on the draft Standards, MfE group and consider them within a regional context in order to identify opportunities to increase the efficiency of Councils within a region to give effect to the Standards.

Furthermore, the period prior to gazettal of the Standards represents significant uncertainty for Councils. Councils, particularly smaller, rural authorities, may consider stalling or halting their district plan review programme prior to gazettal in order to avoid the risk of incurring additional cost to significantly revise recently reviewed plans or parts of plans after 2019. This may have implications for investment in areas where plan changes are necessary to facilitate growth and change.

MDC has appended to this submission its district plan review programme and draft Standards implementation programme to illustrate the potential complexity involved in giving effect to the Standards, and the considerations Councils are likely to face when planning how and when the Standards will be incorporated into planning documents.
Recommendations:

In addition to the recommendations above, MDC recommends the following:

- That MfE group and consider submissions on the draft Standards on a regional basis as well as on a topic or theme basis;
- Implementation guidance be issued prior to or commensurate with the gazettal of the Standards;
- MfE to work with regional and district authorities to identify opportunities to share resources, disseminate learnings and maximise potential efficiencies relating to the implementation of the Standards.

A cohesive and consolidated template: At present, it is not clear how the individual Standards interrelate and function together to form a complete District Plan.

Recommendations:

- That MfE create consolidated planning document templates so that all of the relevant Standards that comprise a planning document can be appreciated and understood as a single cohesive document;
- MDC recommends that this forms part of the guidance and be made available concurrently with the gazetting of the final Standards.

Mandatory vs discretionary directions: Section C (Recognition in Plans) in each of the Standards sets out the mandatory and discretionary directions. Our understanding is that mandatory components must be done without following the Schedule 1 process in the RMA and that the public must be notified of the amendments made. The Standards also advise, “consequential amendments to any plan that are needed to avoid duplication or conflict with amendments as required by paragraph 3 must also be made without using an RMA Schedule 1 process. And further, if consequential amendments go beyond the scope of amendments authorised by section 58I (3)(d) of the RMA, a RMA Schedule 1 process will need to be used”.

MDC requires clarification as to how the question of ‘scope’ will be managed. Who will adjudicate on whether proposed amendments are within scope? How will the adjudication process be managed? And what are the implications for an error in judgement regarding scope (for example, would the declarations process through the Environment Court be available)? Without clear guidance on this matter the process efficiencies sought by the introduction of the Standards may be eroded or undermined as submitters use either the Schedule 1 Hearings process (where the implementation of the Standards are coupled with Schedule 1 plan change processes) or other legal tools to challenge a Council’s use of its discretionary powers. MDC is also interested to understand how the Streamlined Planning Process (SPP) under Part 5 of the RMA may interact with the implementation of Standards where consequential amendments go beyond the scope of amendments authorised by section 58I (3)(d) of the RMA.

Recommendations:

- That MfE guidance include examples and case studies exploring the application of discretion and scope within the mandatory directions to assist Council planners and the wider community interpret this aspect of implementing the Standards;
- That MfE provide direction as to whether SPP could play a role in enabling Councils (either individually or grouped) to implement consequential amendments that go beyond scope.
**Section 32 evaluations:** Several aspects of the Standards direct Councils to detail information in District Plans that should instead be provided in s32 evaluations which are prepared to guide and record the plan development process.

**Recommendation:**

- MDC considers there is an opportunity to make District Plans shorter and more concise and relevant by ensuring they include reference to s32 evaluations to avoid repetition, and require Councils to make s32 evaluations easily available from Council websites (using the 3 clicks rule).

**Landscape, landforms and natural character sections:** MDC notes that natural character is included in the same theme as landscape and landforms in the draft Standards. Natural character is specifically provided for in s6(a) of the RMA, and is a concept separate from outstanding natural features and landscapes, which are provided for in s6(b). Policy 13(2) of the New Zealand Coastal Policy Statement (NZCPS) directs that it be recognised that “natural character is not the same as natural features and landscapes or amenity values”, and goes on to identify the matters that may be included in the concept of ‘natural character’. While the Standards do not preclude Regional Plans, RPS and District Plans from providing for natural character as distinct from landscape and natural features within the ‘landscape, landforms and natural character’ theme, it does not encourage Councils (or the wider community) to apply best planning practice when identifying areas with high or outstanding natural character and developing provisions and methods to manage outcomes in respect of natural character.

**Recommendation:**

- That Part 4 Themes for each statutory planning document provide for natural character separately from natural features and landscapes so as to ensure outcomes that are consistent with s6(a) of the RMA and to give effect to the NZCPS.

**Private plan changes:** It is unclear how private plan changes are be managed under the Standards system. MDC assumes that private plan changes must adhere to the Standards once they have been gazetted, however this is not explicit in either the draft Standards or the s32 evaluation.

One of the benefits of the private plan change process is that the proposer – not the Council – sets the agenda and start time, often with a desired time for the conclusion or resolution of the private plan change in mind. Therefore, Councils could be in the position where they are obliged to process private plan changes ahead of Council-led plan review processes intended to implement the Standards. This could place a strain on Council resources and increase the administrative cost of processing private plan changes.

**Recommendations:**

- That the draft Standards be amended to clarify the relationship between private plan changes and the Standards;
- That guidance be issued either prior to or concurrently with the gazettal of the Standards that explicitly references private plan changes and provides advice as to how Councils can best manage the sequencing of plan development and review, and support private plan changes effectively and efficiently;
- That MfE commit to providing on-the-ground support to Councils and planning practitioners preparing or processing private plan changes to ensure that the efficiency benefits anticipated by the introduction of the Standards are realised.
The inclusion of locally derived content: MDC supports the opportunity the Standards provide to include locally derived content into District Planning documents. It is important for communities to be able to craft planning documents that reflect local circumstances, values and aspirations. The message from the Ministers of Environment and Conservation is that the Standards “are intended to enable local councils and plan users to focus their time and resources on the local content important to them”. However, in light of the reflections made earlier in this submission regarding the challenges of implementation, these benefits may not be realised for several years by some Councils. Similarly, developers and landowners operating within more than one jurisdiction may not experience the benefits of the Standards at a regional or national level for a considerable period. In the intervening period the legibility of individual plans and consistency between plans may even worsen as different Councils proceed at different paces and prioritise different aspects of their plans for transition to the Standards. Creating and supporting regional or sub-regional Council working groups convened to help Councils navigate the transition could be invaluable to minimise disruption and ensuring the process is run as efficiently as possible.

The Ministers also note that the Standards “will help plans be more concise, with less formal, elaborate explanations needed”. It is imperative therefore that locally-derived content also meet these tests in order that planning documents are accessible, reasonably concise and meaningful. MDC would also like to refer MfE to additional comments later in this submission on the ability to include localised content within the context of the Definitions standard.

Recommendations:

- That the Standards be amended to provide direction as to how to locally derived content should be crafted so as to ensure that these aspects of planning documents are concise and accessible for plan users;
- MfE consider creating and supporting regional Council working groups to help Councils navigate transition to the Standards effectively and efficiently.

Incorporation of national direction: One of the intended outcomes identified in the Consultation Document is that National Direction will be consistently incorporated in plans, resulting in better implementation on the ground. MDC is not entirely certain that this will be the outcome. The current suite of Standards allows for the implementation of National Direction to be consistently recorded in planning documents. However, this does not guarantee that the National Direction will been implemented in a way that is consistent with the intention or purpose of the National Direction. The appropriate and consistent implementation of any specific National Direction requires focused training, guidance and effectiveness monitoring by MfE. MDC notes that the Standards for specific provisions, e.g. objectives and policies, may form part of future sets of Planning Standards, and could be formulated to assist Councils to consistently and effectively implement National Direction. For example, through the development of model provisions for District Plans.

Recommendation:

- That consideration be given to the role of specific guidance, training and development of best practice in the consistent and effective implementation of National Policy Statements (NPS) and National Environmental Standards (NES) documents.

2. S-RPS: Regional policy statement structure Standard N/A

   a. Parts 3 and 4 – Core policy statement provisions

   b. Part 5 – Evaluation and Monitoring
3. **S-RP: Regional plan structure Standard N/A**

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

   b. Part 6 – Evaluation and Monitoring

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

   MDC supports the purpose of having a Structure Standard for district plans, allowing for a prescribed name, order of key parts, chapters and sections of district plans. This would allow district plan users to pick up any plan and know approximately where information is contained.

   The Structure Standard would appear to group content into either general topics which are district wide matters, and then individual zoning provisions. It makes more sense that all schedules, appendices and maps are contained within the chapter to which they relate. For end users, it makes sense that all content is connected with the provisions to which they relate – as a one stop shop. There may be some schedules, appendices and maps that relate to district wide matters, in which case it would make sense that those sections be contained at the end of the District Wide section of the new structure as opposed to at the end of the whole plan.

   MDC also supports that the Structure Standard of the plan makes it more difficult for district plans to have a ‘catch all’ rule for activities not anticipated by a plan. At present, the MDC district plan has a ‘Non-Complying’ catch all rule sitting in the front end of the plan. This rule does not link into any topic or zoning chapters, and thus for non-familiar users of the plan it is often not caught or used, and has caused issues for the regulatory planners when advising agents or applicants that in fact their activity is non-complying. MDC’s understanding is that the new structure would in practice would not allow for this.

   MDC also supports in principle the need to adopt the structure proposed as soon as possible. Whilst this places a burden on the Councils resourcing to make this happen, as soon as the structure is imposed then the quicker end users will adapt to the structure and build familiarity with how the structure will work. This way, as further plan changes progress, those plan changes will be as per the structure and slot more efficiently into everyday use, particularly for regulatory planners in Councils or consultancies.

   However, implementing the Standards within parts of the Plan that have recently been reviewed will undoubtedly involve a considerable amount of re-work and additional costs. For example, Plan Change 46 – Feilding Town Centre (operative 2015) introduced an inner and outer business zone, for which there is no direct Zone equivalent in Standard D-ASM. Amending recently reviewed aspects of District Plans to reflect the proposed Zones and other elements required by the Standards, is likely to cause confusion and require Council to engage extensively with the community to explain the changes and the reasons for them.

   **Recommendations:**

   - That support and guidance be made available to Councils during the transitional phase to ensure that implementation can be achieved as effectively and efficiently as possible;
   - That smaller Councils are appropriately supported as they will incur the largest proportional cost per capita.
5. S-CP: Combined plan structure Standard N/A

   a. Introduction chapter

   MDC support the following aspects of S-INTRO:

   The requirement to record updates to the Plan, maps, designations and other statutory mechanisms, as required in Tables 7-9. This will give all plan users greater confidence that they are using and applying the correct and most up-to-date plan or mechanism. The tables provide an easy-to-use method of recording this information.

   The standardisation of contents pages, as provided for in Table 10 of S-IGP.

   MDC considers the following aspects of S-IGP need reconsideration or amendment:

   MDC does not consider the matters in clause 5 of S-IGP are necessary or will contribute to efficient plan-making. For example, recording how RMA Part 2 Matters have been taken into account, recognised or provided for in the development of a Plan will yield perfunctory and unhelpful statements that do not add to the interpretation and implementation of the document. MDC submits that a more useful mandatory direction would be to ensure that all District Plans refer to the s32 evaluation documents, in which an assessment of a Council’s preferred policy approach against the requirements of Part 2 of the RMA, are set out in detail.

   MDC is also concerned that some aspects of S-INTRO are also covered in other draft Standards, which could result in information being duplicated or plans being overly detailed and discursive. For example, a Council may address the local strategic scene under clause 4 of S-INTRO and provide similar information in response to S-SD clause 3 (please also refer to MDC comments under S-SD).

   **Recommendations:**

   - That the draft S-IGP Standards be amended to remove the requirements under clause 5, and replaced with a requirement to refer to the s32 evaluations accompanying the plan’s development;
   - That the direction to address local strategic scene setting be removed and S-SD be the only location in which strategic matters are raised.

   b. How plan works chapter

   The matters listed in clause 7 a, b, and c in S-HPW are typically matters included in s32 evaluations. There is a significant risk that Councils that choose to address these matters in planning documents will duplicate material and information that should be readily available to the public. There is an opportunity to ensure all plans are as efficiently written as possible by recognising that much of the background information which informs a plan review or plan change is provided for in s32 evaluations and supporting technical documents.

   From a plan users’ perspective, it might be worth identifying the important role and function of Planning Maps in this chapter as for most plan users, they first need to
define their sites zoning and any district plan features, before moving into the part of
the plan that their activity relates to.

c. Interpretation
MDC supports the following aspects of S-INTER:

The requirement for Definitions, and the standardisation of the presentation of
definitions, abbreviations and a glossary of te reo Māori terms.

MDC’s comments on the proposed definitions is included below under CM-1.

d. Plan integration

It is unclear from the consultation documents what this refers to.

e. Formation of standards with tangata whenua

See comments on S-TW below.

f. National direction

MDC supports the following aspects of S-NDI:

The format of Table 14 – NPS and Table 15 – NES, and the requirement to provide a
link to the RMA regulations. The tables provide easy-to-use pro forma for recording
key information regarding giving effect to NPS and NES.

MDC recommends that the tables be expanded to provide an additional column in
which the hyperlink to the NPS/NESS can be provided.

7. S-TW: Tangata whenua structure Standard – Part 2 of all plans and policy statements

MDC welcomes the opportunity S-TW provides to ensure that tangata whenua provisions are
consistently located in planning documents, and that the location is prominent within plans.
MDC considers the elements to be included in S-TW chapters are comprehensive. MDC agrees
with the Consultation Document that councils will need to “work with tangata whenua on the
local input under these headings, in partnership through planning processes” (p.17). However,
the Treaty Settlement landscape is extremely complex in Manawatu district, with several key Iwi
stakeholders at different stages in the Settlement process and with variable access to resources
to facilitate engagement in plan making processes. Whilst MDC can support the purpose of the
chapter and its sub-headings in principle, it is too early to comment on the implications of
implementing this Standard at the local level.

Recommendations:

• The implementation guidance could provide a useful opportunity to highlight good
practice case studies where local councils have worked collaboratively and positively
with tangata whenua to ensure local planning documents represent tangata whenua
values, aspirations and provisions;
• That Iwi and Councils be supported and resourced to develop productive partnerships so
that the S-TW Standard can be implemented meaningfully and effectively.
a. Recognition of iwi/hapū chapter

As noted above, the Treaty Settlement landscape in the Manawatu District is complex and it is too early to comment on the efficiency and effectiveness, of this element of the Structure Standard.

b. Tangata whenua local-authority relationships chapter

Too early to comment.

c. Iwi and hapū planning documents chapter

Too early to comment.

d. Consultation chapter

Too early to comment.

e. Use of te reo Māori

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

MDC are concerned that some aspects of S-INTRO are also covered in other draft Standards, which could result in information being duplicated or plans being overly detailed and discursive. For example, a Council may describe the local strategic scene under clause 4 of S-INTRO and provide similar information in response to S-SD clause 3 (please also refer to MDC comments under S-SD).

Recommendation:

- That the direction to address local strategic scene-setting be removed and S-SD be the only location in which strategic matters are raised.


MDC have recently completed a review of the district wide matters in the Manawatu District Plan, which is now partially operative (16 August 2018). This Plan Change has required Council to republish its District Plan and create a new online District Plan. Consequently, the 5 year implementation timeframe will be extremely challenging for MDC to meet and will put a considerable strain on the Council’s resources (staff, time and cost). MDC encourages MfE to consider providing for more flexible implementation programmes that allow Councils to consider implementation of the Standards holistically and comprehensively.

Recommendations:

- That all Councils that have recently reviewed planning documents, or republished their plan within the last 12 months, have access to the 7 year implementation timeframe;
- That MfE consider alternative approaches to facilitate effective staged implementation. The progressive implementation programmes provided for in Policy E1 of the National Policy Statement for Freshwater Management (NPSFM) is a good example of how staged implementation can be transparently recorded and managed.
a. Natural Environment Values Chapter

MDC’s concerns regarding conflating natural character with landscapes and landforms is recorded earlier in this submission. Item 7 under S-NEV of S-DWM similarly considers natural character alongside other matters, which is problematic.

Recommendation:

- That natural character be provided for separately from landforms and landscapes in all of the draft Standards.

b. Environmental Risks Chapter

The environmental risks provided in S-ER appear appropriate. MDC welcomes the opportunity this Standard provides to include other matters in this section that are not provided for in other parts of a Plan. However, the ability to adapt a Plan to local circumstances or requirements runs the risk of increasing variability between plans across the country, and thereby potentially undermine the outcomes sought by the introduction of the Standards.

c. Community Values Chapter

The community values provided in the Standards appear to be appropriate. MDC welcomes the opportunity this Standard provides to include other matters in this section that are not provided for in other parts of a Plan. However, the ability to adapt a Plan to local circumstances or requirements runs the risk of increasing variability between plans across the country, and thereby potentially undermine the outcomes sought by the introduction of the Standards.

d. Infrastructure and Energy Chapter

MDC notes that MfE has been working with industry and other groups on the standardisation of network utilities provisions. As noted in 9. above, MDC have recently completed a review of the district wide matters, which addressed amongst other matters Network Utilities within the Manawatu District Plan (some provisions are still the subject of Environment Court appeals). It is extremely concerning therefore to read that MfE might include a future Standard to cover Network Utilities. If MfE decides to progress this standard, it will impose more cost and additional work for Council on a planning matter which Council is attempting to resolve under direction of the Environment Court in 2018/19. It is noted that Network Utilities are Requiring Authorities with specific powers under the Act to designate land for public works. These enabling provisions in the Act should be acknowledged in weighing up the merits of a future Standard relating to Network Utilities.

Recommendations:

- That clarity be provided as to how Councils will effectively and efficiently manage the incorporation and implementation of future Standards in District Plans;
- That MfE recognise the enabling provisions for Requiring Authorities (Network Utilities operators) in the RMA and that many Councils have already reviewed their Network Utility provisions. A future, ill-timed Standard will create unhelpful churn in the resource management system.
e. Subdivisions Chapter

The basic structure provided for in S-SUB appears appropriate. The ability for planning documents to reference other documents used for the management of subdivision, for example, codes of practice, may result in variation amongst plans, which should be acknowledged and considered by MfE. Guidance or amendment to the Standard may be necessary to ensure that how Codes of Practice are to be referenced in S-SUB chapters.

f. General District Wide Matters Chapter

The general district wide matters provided in the Standards appear to be appropriate. MDC refers MfE to earlier comments made on the risk to the coherency and consistency between plans as a result of providing for variation (see b. and c. above).

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

a. Zone framework (individual and range)

MDC has made comments on the difficulties presented by the Zone framework for MDC’s plan, and highlighted matters MDC and its community may need to consider in order to resolve variance between the current Plan and the requirements of the Standards.

b. Purpose statements

The purpose statements are very brief, compared to the descriptions of Zones in some planning documents. Understanding how a current plan’s zones fit with the purpose of the zone framework in the Standards will take time and resources, and in some instances consultation and discussion with the wider community or specific groups, e.g. developers, tangata whenua, special interest groups. MDC notes that some Councils may rely on the ability in the Standards to identify ‘additional special purpose’ zones to create a locally specific zone framework. This may be a more efficient route for some Councils, but could result in considerable variation between plans.

c. Additional special purpose zones and criteria

MDC welcomes the ability to provide for additional special purpose zones, in particular for nationally and internationally iconic facilities, like Manfeild Park. However, MDC refers MfE to earlier comments made in the submission about the risk to the overall anticipated outcomes of the Standards by providing for local circumstances.

d. Precincts chapter

MDC has made comments on the difficulties presented by the Zone and precinct framework for MDC’s plan, and highlighted matters MDC and its community may need to consider in order to resolve variance between the current Plan and the requirements of the Standards.
e. Development areas chapter

See comments for a. and d. above.

f. Designations chapter

MDC would like clarification as to whether MfE Councils will be required to display Table 16 in plans exactly in the manner prescribed, or whether it could be displayed horizontally instead of vertically – see MDC’s example attached. A horizontal table would, in MDC’s consideration, be more efficient in terms of space and layout, in particular in instances where supporting information needs to be identified, like conditions attached to a Designation.

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

MDC submits that it may be more practical and sensible for all schedules, appendices and maps to be contained within the chapter to which they relate. For end users, it makes sense that all related content is connected with the provisions and sit together – a ‘one stop shop’ approach. For PC46 (operative 2015), PC52 (operative 2017) and PC60 (soon to be operative) MDC made an intentional decision to enhance the end user experience and engagement with the District Plan, in this way. This change has been well received by plan users. There may be some schedules, appendices and maps that relate to district wide matters – in which case it may sensible that this information is contained at the end of the District Wide section of the new structure, as opposed to at the end of the whole plan.

Recommendation:

- That MfE consider an alternative approach to S-SAM to facilitate effective integrated content as provided in the MDC District Plan and many other 2nd generation District Plans.

12. F-1: Electronic accessibility and functionality Standard

a. Standard baseline requirements

**Timeframes:** MDC considers the timeframes are acceptable for its GIS team and other related services, to achieve baseline accessibility and functionality. MDC envisages that the work to achieve the baseline can be done ‘in-house’ and within existing budgets.

**Plan accessibility and functionality:** MDC agrees with Instructions 2-5 and 8-11, and considers that Instructions 13-14 can be achieved within existing time and financial resources.

Instruction 7 could result in unnecessary duplication and additional content to a planning document.

Instruction 12 could add an additional time and cost burden on Councils. Many older plans are not in a format that can be readily digitised, and hosting the documents on individual Council websites could result in storage issues for smaller councils, and downloading issues for customers and plan users in rural locations with poor internet access. MDC consider that this aspect of F-1 does not, in its current form, contribute to improving consistency of plan making or make plans more user friendly.
Recommendations:

- That Instruction 7 be amended to require a general note to be provided, as part of S-IGP, alerting plan users that activities provided for in a Plan may require consent from another Plan;
- That MfE consider providing a central portal from which all older, non-operative Plans from all Councils are available, and that Councils be offered financial or other assistance to ensure that the digitisation of older documents does not become a time and financial burden for smaller, less resourced Councils.

Plan Text: MDC agrees with the goal of improving consistency and legibility of language in plans.

Recommendations:

- That a standard for Plan Text as described in Instruction 15 should be developed as part of the National Planning Standards;
- That a nationally applicable protocol for identifying the type of provision (e.g. under s62, s63 etc.) could also be developed and included in the Standards.

b. Level 5 requirements

MDC considers the 5 year timeframe is acceptable for its GIS team and other related services to achieve Level 5 requirements.

Recommendation:

- That in order for this aspect of the Standards to contribute to the Ministry’s aims to make plans easier to prepare and consistent, a comprehensive and thorough process or methodology for e-plan development be issued as guidance, either prior to or simultaneously with the gazettal of the Standards in April 2019.

F-2: Mapping Standard

c. Zone colour palette

MDC supports the introduction of standardised colour palettes and symbology. However, MDC notes that there appears to be a high degree of similarity between the zone colours within the Residential zones, and similarly the open space, active recreation and conservation zones. This could be problematic, particularly for those who have colour blindness or are sight impaired.

Recommendations:

- MDC would welcome greater variation of colour shades or tones within colour groups; and
- The use of hatching could also assist in providing variation between zones;
d. Symbology

MDC considers that the blue outline demarcation for Designations could be confused with water-related symbology, including those not currently identified in the Standards, for example waterbodies.

MDC also considers that there is likely to be other symbols used by Councils that could also be helpfully incorporated within the Standard symbology, for example significant waterbodies, geological sites, outstanding landscapes and outstanding natural features, railway lines and contaminated sites.

MDC is also concerned that there are insufficient standardised symbols in the Standards at present. This could lead to the proliferation of non-Standard symbols across the country, which will undermine the goal of achieving consistency across all plans.

Recommendations:

- That the Designation symbology be reviewed so that it cannot be confused with water-related symbols;
- That MfE work with Councils to identify additional planning matters for which common symbols and icons could be developed;
- That through proactive effectiveness monitoring of the implementation of the Standards by MfE will ensure that the emergence of consistency within other symbology can be identified and communicated to all Councils.

13. F-3: Spatial planning tools (Regional) Standard N/A

a. Range of tools

b. Zone

c. Overlay

d. Specific control

e. FMU

f. Airshed

g. Area
14. F-4: Spatial planning tools (District) Standard

a. Range of tools

Implementing this Standard will require MDC to reorganise some aspects of the Plan, for example, the tools have implications for MDC’s identified Flood Channels 1 and 2 Zones in the District Plan. MDC’s understanding of F-4 is that Flood Channels will need to be expressed as ‘overlays’. The re-organisation will not be limited to the implementation of F-4, as there will be consequential changes required in other parts of the Plan.

MDC does not consider that there are sufficient tools in F-4 to illustrate the complexity of planning matters in coastal environments.

MDC considers that a smaller unit is required after ‘precinct’, for example, ‘area’.

Recommendations:

- That MfE review the spatial tools and symbology to ensure that Councils can illustrate the complexity of coastal environments consistently.
- That a smaller area below ‘precinct’ be considered, such as ‘area’.
- That sufficient advice and guidance be provided to enable Councils to transition to the new tools as efficiently as possible.

b. Zone

Please refer to general comments above.

c. Overlay

Please refer to general comments above.

d. Precinct

Please refer to general comments above.

e. Specific control

Please refer to general comments above.

f. Development areas

Please refer to general comments above.

g. Designation

Please refer to general comments above.

15. F-5: Chapter Form standard

Please refer to general comments above.
a. Chapter form

b. Rules

c. Rule tables

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

Please refer to general comments above.

a. Status of rules and other text

b. Numbering

17. CM-1: Definitions standard

MDC supports the introduction of mandatory definitions in principle, particularly if those mandatory definitions build consistency between legislation, for example the definition of a building under the RMA and the Building Act, or the definition of a natural hazard. However, the Standards still allow for localised content, and MDC is concerned that this will generate the need for non-standard definitions that could potentially undermine the purpose and function of standard definitions.

Some of the definitions proposed are more limiting or overly broad and generalised compared to MDC’s existing definitions, many of which have been introduced via recent plan changes. For example the Industrial Zone Plan change recently introduced specific definitions for types of industry, for example, ‘agricultural industry’. MDC is concerned that this is not provided for in the industrial activity definition. MDC would need to consider how to address specific activity definitions in either a rules framework or more specific definitions. The flow on effect will be further plan changes, with timeframes of a plan change to update the district plan, and undoubtedly have an impact on Council resources.

Plan changes have a significant impact on the workload of regulatory planners. District Plans become increasingly difficult to navigate, particularly where a Council has adopted a rolling review approach. If experienced regulatory planners struggle in such spaces, then it can be expected that other end users of a district plan will turn to Council staff for explanation and navigation of the plan. This has the potential to undermine the purpose of the draft Standards, to make plan making and plan using more efficient and effective.

a. Individual definitions

Earthworks – MDC is concerned with the use of the term ‘the existing ground contour or ground level’. How does one determine what was the existing ground contour? Is it in the ground’s original state, prior to earthworks, prior to built development, prior to subdivision development, or is it post subdivision development?

b. Additional definitions

Identifying additional definitions at this stage is a time-intensive process. MDC would also like MfE to refer to comments made in the submission regarding the impact of the regional plan making and review process on the identification of additional definitions.
Trimming or Pruning of Trees: Section 76 of the RMA gives Councils the ability to restrict the felling or trimming of trees, and MDC considers a definition of 'trimming' should therefore be included in the definitions section of the National Planning Standards. Not having this term defined has the potential to cause disagreement between plan users and arborists and result in a lack of consistency across District Plans. A standard definition would provide an opportunity to ensure that there is a consistent understanding of the term 'trimming' nationally.

18. CM-2: Draft noise and vibration metrics standard

MDC supports the introduction of mandatory noise and vibration standards through plans. It could eliminate a lot of debate between practitioners, which will lead to more efficiency in the plan making and consenting processes.

a. Technical support

19. Implementation

Comments on Implementation have been provided throughout this submission. Specific comments on e-planning implementation, timing and support are provided below.

a. ePlanning implementation

MDC agrees that enhanced online accessibility will help big business/consultancies in the short term however, it may not assist the large majority of customers in the MDC community. In the MDC context, there are few big businesses who engage with the District Plan on a regular basis. Most RMA customers are individuals working on an a proposal that affects a specific property. MDC’s subdivision consent profile over the last 5 years shows that the majority of subdivisions have been infill residential or rural subdivisions, by ‘mums and dads’ and not experienced developers. Typical land use consents are for boundary encroachments or non-compliances with other performance standards linked to the establishment of dwellings on properties. The RMA customers in the District are one-off visitors and users of the District Plan, who have no pre-existing knowledge of planning, the District Plan or the consenting requirements. These customers also do not always know how to interpret the provisions of the District Plan or how to ascertain whether a resource consent is needed.

A good, interactive and responsive eplan could help individuals navigate a district plan, but MDC anticipates that in the short to medium term an e-plan is unlikely to lead to a significant change in the way people engage with planning. For some rural Councils, or Councils with a significant rural area, the availability of good quality broadband is also a limiting factor to people engaging with planning processes. These factors need to be recognised and considered in determining appropriate timelines for e-planning implementation.

MDC submits that the implementation of Planning Standards will not alter the need for Council’s to provide a duty planner service. As noted, the large majority of MDC’s customers are not “RMA literate” and do not engage a professional planner to assist them in an RMA process. They will have difficulty accessing and navigating an e-plan, without individualised support.
b. Timing

As part of this submission, MDC has provided a draft Standards Implementation programme which seeks to highlight the challenges and considerations involved in implementing the Standards from 2019 onwards. In addition to the comments and questions raised in that table, MDC would like to add the following comments. The implementation of the Planning Standards will have an adverse impact on the Work Programme for the District Plan review because:

- It will potentially delay the current programme of plan changes which are crucial to maintain and enhance the legibility and functionality of the operative District Plan.
- The requirement to insert a new set of Definitions will add further confusion and difficulty for customers and end users in interpreting the operative District Plan.
- It is likely to divert scarce funds and resources away from the completing proposed plan changes to advance extra “administrative” plan changes, to implement the standards;
- Significant time and effort will be required by Council staff, RMA professionals and end users to adapt and learn new definitions and zoning names, with knock-on effects in terms of the consequential changes required within the District Plan;
- Considerable resources will be required to inform and educate the public and end users:
  - On the plan making process due to the mandatory requirements
  - On the delays on progressing other planning/topic based issues
  - On how to navigate the new plan and provisions.

c. Support

MDC strongly supports the proposal to target MfE resources and funding to smaller rural Councils.

d. District plan structure guidance

See earlier comments in this submission.

e. Regional policy statement and regional plan structure guidance N/A

f. District plan spatial planning tools and zone framework guidance

See earlier comments in this submission.

g. Regional plan and policy statement spatial tools guidance N/A

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

See earlier comments in this submission.

i. Additional guidance materials required

See earlier comments in this submission.
20. Future content for standards

See earlier comments in this submission.

a. Utilities provisions

Comments on the future utilities provisions and particular concerns for MDC have been made earlier in this submission.

Other comments

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

Thank you for this opportunity. Preparing this submission has taken considerable time and resources and input from a number of staff at MDC. MDC would welcome any opportunity to continue the discussion with MfE on the matters raised in this submission, particularly within a regional or sub-regional context.

As part of its submission, MDC appends the following:

- Appendix 1 - The Council’s district plan review programme;
- Appendix 2 – A draft Standard implementation programme; and
- Appendix 3 - An excerpt of the Designations Schedule from the Council’s Operative Plan.

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.
### District Plan Proposed Work Programme (Updated August 2018)

**Review (technical assessments, consultation, Council workshops)**

- Hearing (hold hearings, deliberations and prepare Decision Report)
- Decision (Public notification of Decisions on Submissions on Proposed Plan Change, District Plan Updates/Reprints)
- Operative Date of Plan Change

### Project A

<table>
<thead>
<tr>
<th>Subject Matter/Topic</th>
<th>PC No</th>
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<tr>
<td><strong>Industrial Zone, Industrial Subdivision Precinct 5</strong></td>
<td>52</td>
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<tr>
<td>Designations (except Horizons stopbanks)</td>
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</tr>
<tr>
<td>Noise and District-wide rules incl. Network Utilities; Transport; Noise; Earthworks; Signage; Temporary Activities &amp; Relocated Buildings incl. relevant appendices</td>
<td>55</td>
</tr>
<tr>
<td>Significant landscapes incl. appendix 1A, 1B &amp; 1C</td>
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### Project B

- Boarding, Breeding and Training Kennels
- Rural Zone and Rural Subdivision incl. rural and flood channel zones; Rural Lifestyle/nodal subdivision, Earthworks (rural), Renewable Energy, water use, and air quality
- Coastal Environment
- Natural hazards (rural) incl. Coastal & Esplanade Management incl. relevant appendices

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<th>Year</th>
<th>Y1 Budget - $500K</th>
<th>Y2 Budget - $600K</th>
<th>Y3 Budget - $600K</th>
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<td></td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td></td>
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</tr>
<tr>
<td>2019</td>
<td></td>
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Appendix 1 - the Council’s district plan review programme

District Plan Proposed Work Programme (Updated August 2018)

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Designation – Horizons (on hold) New: Ohakea / MDC</td>
<td>60A</td>
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<td>Feilding Growth (Precinct 4) (Urban Hazards)</td>
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<td>Feilding Growth (Precinct 1-3) (Deferred Residential Zoning Change to Residential)</td>
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<td>Residential, Villages (and Residential subdivision) &amp; Business zones (outside PC 46)</td>
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<tr>
<td>Recreation &amp; Activities on surface of rivers and lakes</td>
<td>58</td>
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<td>Hazardous Substances &amp; Contaminated Land</td>
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<td>Heritage trees and heritage (remainder of District)</td>
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<td>Tangata Whenua Maori Land and Marae</td>
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<td>Cross-boundary Issues</td>
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<tr>
<td>Land Use Effects - General (4.1,4.2)</td>
<td>Not assigned</td>
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<td>Subdivision (General) (washup)</td>
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<tr>
<td>Financial Contributions</td>
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</table>
| Appeals/Environment Court Hearings | TBC | | | | | *
| District Plan Reprint and Maps | TBC/PC53? | | | | | **

*Note: Update to incorp. PC55
**Note: Update to implement National Planning Standards

PAGE | 2
## District Plan Proposed Work Programme (Updated August 2018)

**Review** (technical assessments, consultation, Council workshops)

**Revise/Prepare** (drafting Plan Change documents, consultation, Council Workshops)

**Notification** (Plan Change documents finalised, Council Report, prepare for notification, public notice)

**Submissions** (submission period, summary of submissions, further submissions, prepare Section 42A(office) Report)

**Hearing** (hold hearings, deliberations and prepare Decision Report)

**Decision** (Public notification of Decisions on Submissions on Proposed Plan Change, District Plan Updates/Reprints)

**Operative Date of Plan Change**

### Progress to Date

#### PROJECT D – National Planning Standards

<table>
<thead>
<tr>
<th>Year</th>
<th>Subject Matter/Topic</th>
<th>PC Number</th>
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<tbody>
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<td>2017</td>
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<td>2018</td>
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<tr>
<td>2019</td>
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</tbody>
</table>
## Appendix 2

**MDC Working Draft - Proposed approach to implementing National Planning Standards and indicative timeline**

<table>
<thead>
<tr>
<th>Year</th>
<th>Implementation Task</th>
<th>Questions and Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018-2020</td>
<td>• August 2018-Feb 2019 – MFE Workshops with submitters to discuss possible changes to Draft Standards</td>
<td>MDC considers opportunities exist to support Councils in the delivery of this information, either at regional or national scale.</td>
</tr>
<tr>
<td></td>
<td>• Develop and deliver education/awareness-raising for wider community on implications of Standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Focus on achieving baseline District Plan Functionality and Accessibility Standard – largely minor changes to how planning information is shown and accessed on our website</td>
<td>MDC considers opportunities exist to support Councils in the delivery of this information, either at regional or national scale.</td>
</tr>
<tr>
<td></td>
<td>• Commence planning for e-plan delivery (potentially work with other councils)</td>
<td>The Horizons One Plan has many ‘rural’ definitions which will require amendment to align with the Standards (there will be significant consequential changes to regional policy provisions). It may be more efficient for MDC and the wider community to wait for the One Plan to instigate the changes necessary to align the regional planning documents with the Standards before commencing with its Rural plan change. This could have implications for the Council’s implementation programme and ability to develop and implement policy and provisions to address issues in the rural environment and ensure the delivery of appropriate environmental outcomes.</td>
</tr>
<tr>
<td></td>
<td>• Consider future requirement for District Plan to include hyperlinks to regional and national provisions</td>
<td>The period prior to gazetral of the Standards represents significant uncertainty for Councils. Councils, particularly smaller, rural authorities, may consider stalling or halting their district plan review programme in order to avoid the risk of incurring additional cost to significantly revise recently reviewed plans or parts of plans. This may have implications for investment in areas where plan changes are necessary to facilitate growth and change.</td>
</tr>
<tr>
<td>2018-2019</td>
<td>• Continue to advance District Plan Work Programme to April 2019, particularly proposed Precinct 4 and ONFL Plan Changes</td>
<td>The period prior to gazetral of the Standards represents significant uncertainty for Councils. Councils, particularly smaller, rural authorities, may consider stalling or halting their district plan review programme in order to avoid the risk of incurring additional cost to significantly revise recently reviewed plans or parts of plans. This may have implications for investment in areas where plan changes are necessary to facilitate growth and change.</td>
</tr>
<tr>
<td></td>
<td>• Re-schedule Rural Plan Change to ensure changes required to One Plan can be efficiently reflected in district plan.</td>
<td>The Horizons One Plan has many ‘rural’ definitions which will require amendment to align with the Standards (there will be significant consequential changes to regional policy provisions). It may be more efficient for MDC and the wider community to wait for the One Plan to instigate the changes necessary to align the regional planning documents with the Standards before commencing with its Rural plan change. This could have implications for the Council’s implementation programme and ability to develop and implement policy and provisions to address issues in the rural environment and ensure the delivery of appropriate environmental outcomes.</td>
</tr>
</tbody>
</table>
### Appendix 2

#### MDC Working Draft - Proposed approach to implementing National Planning Standards and indicative timeline

<table>
<thead>
<tr>
<th>2019 onwards</th>
<th>Commence implementation of gazetted Standards, including:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• “Mandatory” Plan Change required to introduce ‘straight forward definitions’, i.e. those that will not result inconsequential changes to the District Plan and can be done outside of Schedule 1 process required</td>
</tr>
<tr>
<td></td>
<td>• Plan Change required to establish new District Plan Structure and zoning framework, i.e. the application of new Zone names and key planning techniques / spatial planning tools.</td>
</tr>
<tr>
<td></td>
<td>• Incorporate the balance of the Standards Definitions (adjusted definitions) package via plan changes, as currently programmed within 5 years: rural; residential/villages; Town Centre</td>
</tr>
</tbody>
</table>

- Consider implications of Standards on proposed review of Feilding Town Centre and re-schedule accordingly

The proposed review of the Feilding Town Centre provisions could benefit from waiting for the outcome of the mandatory and Discretionary DP Structure & Zoning framework Plan Change, that way the zone name and planning tools are settled. However, need to consider and manage the implications of any delay, e.g. impact on resources, impact on future growth and development in Feilding Town Centre.

- See comments in main submission regarding Definitions standard.

Likely to require Schedule 1 process, which will impact on the time and cost of delivery of Standards. Other considerations include:

- Current Villages Zone possibly re-zoned to Rural Settlement Zone. But is this suitable for MDC’s coastal villages?
- There are several options for Inner and Outer Business Zones, e.g. Town Centre Zone could align with Precinct A and B; Town Centre Zone + Commercial Zone, or Local Commercial Zone?
- The draft Standards do not support zones like Manfeild Park and the Special Development Zone. Is Special Purpose Zone appropriate? Stadium Zone?

See comments in main submission regarding Definitions standard.
An outline plan must show the physical features of the work, its location and relationship to the site and any other matters to avoid remedy or mitigate any adverse effects on the environment. The outline plan procedure enables Council to better ascertain the effects of future development and ensure they are controlled.

An outline plan is not required if the work has otherwise been approved under the Resource Management Act 1991, or if details of the work have been incorporated into the designation or if the Council waives the requirement.

### 9.3 Appendix 7A

Appendix 7A contains the Schedule of Designations within the Manawatu District. This schedule includes details of the designating authority and the location and legal description of the designated site.

**Appendix 7A – Schedule of Designations**

<table>
<thead>
<tr>
<th>No</th>
<th>Requiring Authority</th>
<th>Designation Site</th>
<th>Designated purpose</th>
<th>Underlying Zoning</th>
<th>Legal Description</th>
<th>Further Details</th>
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</thead>
<tbody>
<tr>
<td>D1</td>
<td>NZ Transport Agency</td>
<td>State Highway 1</td>
<td>To undertake maintenance, operation and use of, and improvements to the State Highway network</td>
<td>Various</td>
<td>Various</td>
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<tr>
<td>D2</td>
<td>NZ Transport Agency</td>
<td>State Highway 3</td>
<td>To undertake maintenance, operation and use of, and improvements to the State Highway network</td>
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<tr>
<td>D3</td>
<td>NZ Transport Agency</td>
<td>State Highway 54</td>
<td>To undertake maintenance, operation and use of, and improvements to the State Highway network</td>
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<td>D4</td>
<td>NZ Transport Agency</td>
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<td>D5</td>
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<td>D6A</td>
<td>KiwiRail Holdings Limited</td>
<td>N.Island Main Trunk Railway</td>
<td>Railway Purposes</td>
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<td>D6B</td>
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<td>P.North – Gisborne Railway</td>
<td>Railway Purposes</td>
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<td>D7</td>
<td>Manawatu District Council</td>
<td>Highfield Reservoir</td>
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<td>Rural 2</td>
<td>Lot 1 DP 18077 Blk XIV Oroua SD</td>
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