

Proposed National Planning Standard	Support / Oppose / Neutral	Buller District Council Response
S-DP: Draft District Plan Structure		
<p>Standard 1 and Standard 2</p> <p>Except as provided in direction 2 below, local authorities must amend their documents in accordance with section 58I of the RMA within 5 years of gazettal of this planning standard.</p>	Partly oppose	<p>Our Council does not meet the criteria in the Consultation Document to implement the Standards for district plan structure within seven years of gazettal of the Standards (April 2027). This means that we must implement the structure Standard within five years, by April 2025. We are uncertain if this time frame can be met.</p> <p>The Local Government Commission is currently going through a process of considering whether the three territorial authorities on the West Coast should have a Combined District Plan. Should the decision be made to proceed with a Combined District Plan, it may be unrealistic to expect the three West Coast territorial authorities to implement the Standards whilst going through the Combined District Plan development process within the five-year timeframe.</p> <p>Alternatively, if the Local Government Commission’s decision is to not proceed with a Combined District Plan, then we will continue with our rolling review of the Buller District Plan. We are a small council with limited resources therefore, again, it may be unrealistic to expect us to both implement the Standards within the five-year timeframe and continue with our Plan review.</p> <p>We support more flexibility in this Standard and/or the option to request further time to implement if needed. Other smaller councils may be in the same position. We note that in the supporting documents, MFE refer to smaller councils needing more support and possibly individual assistance with implementation. It would be useful to get this confirmed in writing at an early stage (i.e. now) to the individual councils most likely to be affected.</p>
<p>Standard 3</p> <p>All district plans must contain mandatory headings (i.e. part, chapter or section headings)...</p>	Support	

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Table 5: Part 1 Introduction and General Provisions	Support	We generally support the 'Introduction and General Provisions' requirements. However, in our experience plan users very rarely refer to the Introduction section of our District Plan therefore the mandatory matters should be kept to a minimum.
Table 5: Part 2 – Tangata Whenua	Neutral	
Table 5: Part 3 – Strategic Direction	Strongly Support	The flexibility to include strategic direction is strongly supported as it will enable Councils to focus on significant resource management matters for their district where needed. For our council, this includes appropriate utilisation of mineral resources.
<p>Table 5: Part 4 - District Wide Matters</p> <p>If the local authority has mining activities that require management, it must provide a <i>Mining</i> section in the location identified.</p>	Partly Oppose	<p>We note that all the objectives, policies and rules are required to be grouped together under the respective topics. We support this approach and agree with the Discussion Document that it will provide a clear 'line of sight' between objectives, policies and rules.</p> <p>However, we disagree with the inclusion of mining in the 'General district-wide matters' chapter. For our district, mining is a significant activity and hence economic driver, and this is reflected in our Plan.</p> <p>We request that the Standard include flexibility to have 'Mining' as a standalone topic to reflect its significance to our District.</p>
Table 5: Part 6 – Schedules, Appendices and Maps	Neutral	

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S-IGP: Introduction and General Provisions Standard		
<p>Standards 4 - 10</p> <p>4. If the following matters are addressed in the policy statement/plan, they must be included in the <i>Purpose</i> section: ...</p> <p>5. If the following matters are addressed in the policy statement/plan, they must be included in the <i>Region and its Resources, or Description of Region or Description of the District</i> (as relevant for the policy statement or plan) section: ...</p> <p>Similar wording is repeated for the other sections mentioned in Standards 6-10.</p>	Strongly Support	The option to include the matters listed in the various Introduction sections, or to not include them, is strongly supported. This will enable councils to include information in the Introduction, or not, as appropriate for their district.
<p>Standard 22</p> <p>22. All policy statements and plans must include a national direction instruments chapter as set out in Table 13: National direction instruments below.</p>	Oppose	<p>We are not convinced that including a list of national direction instruments and how they are being given effect to will add value to planning documents. Such a list may become extremely lengthy and this seems to go against the simplifying and streamlining principle of previous RMA amendments.</p> <p>National policies and standards are reviewed and changed by central government, which could create further work for councils to list implementation of the changed national policies and standards in plans. The implementation information in planning documents would potentially be outdated every year as councils progressively implement the national direction, creating more work to keep the planning documents up to date. RMA planning documents are not the best document to record implementation of national direction. Councils can instead make this information publicly available on their websites. We seek that Standard 22 be either removed from the Standards or be made optional.</p>

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S-TW: Tangata Whenua Structure Standard		
<p>Standard 3 – 6</p> <p>3. If the following matters are addressed in policy statements and plans, they must be located in the <i>Recognition of iwi/hapū</i> chapter: ...</p> <p>4. If the following matters are addressed in policy statements and plans, they must be located in the <i>Tangata whenua-local authority relationships</i> chapter: ...</p> <p>5. If the following matters are addressed in policy statements and plans, they must be located in the <i>Iwi and hapū planning documents</i> chapter: ...</p> <p>6. If the following matters are addressed in policy statements and plans, they must be located in the <i>Consultation</i> chapter: ...</p>	Partly Oppose	<p>We understand that the requirement to have different chapters for the matters listed may be necessary for districts/regions where there are a number of iwi and/or hapu. However, in the West Coast region, there are fewer iwi and Rūnanga, therefore having four separate chapters in our District Plan for recognition of iwi/hapu, tangata whenua-local authority relationships, iwi and hapu planning documents, and consultation, is considered unnecessary.</p> <p>We seek that Standards 3-6 provide the option to include these matters as parts, sections or sub-headings within a chapter.</p>
S-DWM: Draft District Wide Matters Standard		
<p>Standard 3</p> <p>This chapter and any section in this chapter must include objectives, policies and <u>methods</u>, including rules (if any).</p>	Partly Oppose	<p>We do not see the necessity for requiring mandatory inclusion of ‘methods’ for every topic. We do not consider that they add value to a plan and in our experience, these are merely statements of intent that may, or may not be implemented.</p> <p>We request the Standard be amended so that inclusion of ‘methods’ is not a mandatory requirement and is left to Council discretion.</p>

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The requirement for methods is also repeated in the following Standards: 6(b), 7(b), 10, 15,17(a), 18(a) 19(a), 23(a), 26(b), 28, 30(a), 31(a)		
S-ASM: Draft Area Specific Matters Standard		
<p>Standard 4</p> <p>Where a zone is to be used, each zone must include objectives, policies and methods including rules (if any) in accordance with ...</p>	Oppose	<p>We do not see the necessity for requiring mandatory inclusion of ‘methods’ for every zone. We do not consider that they add value to a plan as in our experience, these are merely statements of intent that may, or may not be, implemented.</p> <p>We request the Standard be amended so that inclusion of ‘methods’ is not a mandatory requirement and is left to Council discretion.</p>
<p>Standard 8</p> <p>The local authority must choose at least one of the following zones to use in their Plans. Each zone option contains a purpose statement which the zone provisions must fulfil.</p> <p>Definition of Rural Zone – The purpose of the Rural Zone is to provide primarily for primary production activities. The zone may also provide for a <u>limited</u> range of activities which support rural production.</p>	Partly Oppose	<p>The one issue we have is with the definition of Rural Zone. We object to the inclusion of the word ‘limited’ as this implies a level of restriction on what supporting activities are considered acceptable within the Rural Zone. We regard our Rural Zone as a productive working environment where a whole range of rural support activities can take place.</p> <p>We request that ‘limited’ be removed from the definition of Standard 8.</p>
S-SAM: Schedules, Appendices and Maps Standard		
Standard 3 – 11	Support	

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F-1: Electronic Accessibility and Functionality Standard		
<p>Table 18: Standard for baseline accessibility and functionality requirements</p> <p>Timeframes – 1. This baseline accessibility and functionality requirements part of the planning standard must be implemented within 12 months of the gazettal of this national planning standard.</p>	Partly Oppose	<p>Although we generally support these standards, our Council has limited resources so only offers basic on-line access to the District Plan i.e. Pdfs of the respective chapters and zone maps, there are no interactive elements to the service.</p> <p>We are concerned with our ability to meet the baseline accessibility and functionality within the 12 months of gazettal timeframe.</p> <p>Our preference would be to have no timeframe.</p>
F-2: Mapping Standard		
Standards 1 – 5	Support	
F-4: Draft Spatial Planning Tools (District) Standard		
Standards 1 -4	Neutral	
F-5: Chapter Form Standard		
Table 26: Rule Table	Neutral	

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F-6: Status of Rules and Other Text and Numbering Form Standard		
Table 28: Numbering table	Neutral	
CM-1: Definitions Standard		
Numerous definitions from the RMA are included in the Standards.	Partly Oppose	Some of the definitions within the definition Standards are the same terms as in the RMA, and we consider there is little value in duplicating these in regional and district plans. We request that any RMA definition be removed from the Standards definitions.
CM-2: Draft Noise and Vibration Metrics Standard		
Standards 1 - 4	Support	