



Ministry for the
Environment
Manatū Mō Te Taiao

2M IMPLEMENTATION

Recommendations on Submissions Report for the first set of
National Planning Standards

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Context to this document

This document forms part of the suite of recommendations on submissions reports prepared for the National Planning Standards. It should be read in conjunction with the Overall Introduction and is likely to reference other recommendations on submissions reports listed below. The recommendations on submissions reports are organised as follows:

1. **Overall introduction**

- Explanation of all of the recommendations on submissions reports
- High-level submissions analysis

Detailed recommendation reports

2A. **Regional Policy Statement Structure Standard report**

2B. **Regional Plan Structure Standard report**

2C. **District Plan Structure Standard**

2D. **Combined Plan Structure Standard**

2E. **Chapter Standards report** including

- Introduction and General Provisions Standard
- National Direction
- Tangata Whenua Standard
- Strategic Direction Standard
- District-wide Matters Standard
- Designations Standard
- Schedules, Appendices and Maps Standard

2F. **Format Standard** including

- Chapter Form Standard
- Status of Rules and Other Text and Numbering Form Standard

2G. **Zone Framework Standard**

2H. **Spatial Layers Standards** including

- Regional Spatial Layers Standard
- District Spatial Layers Standard

2I. **Definitions Standard**

2J. **Noise and Vibration Metrics Standard**

2K. **Electronic Accessibility and Functionality Standard** including

- Baseline electronic accessibility
- Online interactive plans

2L. **Mapping Standard**

2M. **Implementation of the Standards**

1 Introduction

This report discusses the submissions received and decisions on recommendations made in regard to the implementation of the National Planning Standards. The following sections cover:

- implementation timeframes
- general implementation support
- general guidance
- submissions analysis of suggestions for future content-based standards.

2 Implementation timeframes

2.1 Background

The default timeframes for the first set of planning standards are set out in section 58I and 58J of the Resource Management Act 1991 (RMA), which states:

58I Local authority recognition of national planning standards

Mandatory directions

- (2) If a national planning standard so directs, a local authority must amend each of its documents—
 - (a) to include specific provisions in the documents; and
 - (b) to ensure that the document is consistent with any constraint or limit placed on the content of the document under section 58C(2)(a) to (c).
- (3) An amendment required by subsection (2) must—
 - (a) be made without using any of the processes set out in Schedule 1; and
 - (b) be made within the time specified in the national planning standard or (in the absence of a specified time) within 1 year after the date of the notification in the Gazette of the approval of the national planning standard; and...

58J Time frames applying under first set of national planning standards

- (1) In the case of the first set of national planning standards, if a process provided by Schedule 1 is required, a local authority must make any amendments required not later than the fifth anniversary of the date on which the first set is notified in the Gazette under section 58K, unless—
 - (a) a different time is specified in the first set; or
 - (b) subsection (3) applies.

Under the RMA, standards and their directions must be identified as either mandatory or discretionary. Whether a direction is mandatory or discretionary dictates the timeframe available for implementation.

Mandatory directions must be implemented without a Schedule 1 process within one year of gazettal. Discretionary directions provide councils with choices on how they are implemented. Accordingly they must proceed through a Schedule 1 process within five years of gazettal.

The only standard proposed that includes discretionary directions is the Zone Framework Standard. Therefore, all of the other standards would need to be implemented within a year.

The draft standards went out for consultation with alternative implementation timeframes agreed by the Minister for the Environment. These timeframes are:

- one year for basic electronic planning (ePlanning) requirements (discussed further below)
- five years for all other standards
- a two-year extension (total of seven years) for councils who have recently reviewed their plans.

Basic ePlanning requirements (one year) were not considered to be overly onerous to implement, would not affect plan content and would not have a significant flow-on effect on plan structure and format. The Ministry for the Environment (the Ministry) expected that most councils would meet these requirements through their existing resources. Therefore, the proposed implementation of these standards was within one year from gazettal of the standards, in April 2020.

An overall timeframe of five years from gazettal was given to most councils to implement all standards (apart from the basic ePlanning standards). A two-year extension (to seven years) was given to councils who have recently completed a plan review.

These timeframes were considered to provide a balance between seeing their benefits sooner and minimising the number of councils required to complete their plan changes faster than their current plan review programmes.

The Ministry considered that most councils would be able to use resources that are already allocated to amend plans, reducing additional cost burdens, as these can be implemented with a full plan review.

2.2 Submissions

Of the 201 submissions on the draft standards, 70 included comments on the implementation timeframes. Of these, 59 submitters thought more time was needed. This view came from councils as well as professional bodies, nationwide companies and interest groups.

Submitters were concerned about:

- the cost of early plan reviews triggered by the standards for plans recently finalised, often after a long process
- the level of external support that some councils will need to implement the standards
- increasing amounts of national direction leading councils to delay the implementation of the standards or other national direction
- the impacts of amending policy statements and plans to implement the standards at once in terms of making it more difficult for councils to maintain a proper plan hierarchy (ie, regional policy statements directing district and regional plans) and to achieve an integrated planning framework
- the efficiencies of implementing some standards, particularly definitions, before a full plan review
- the costs and efficiencies of requiring smaller councils to implement an ePlan within five years.

2.2.1 Some supported the timeframes proposed

Five councils (Christchurch, Nelson, Wellington City, Taupō, Waitomo) and five national plan users (Harrison Grierson, KiwiRail, Retirement Villages Association, Spark and Vodafone) explicitly stated that they are satisfied with the proposed timeframes.

Christchurch City Council supported the proposed seven-year timeframe for implementation as it would allow the planning standards to be integrated into its normal plan review cycle. They also asked for clarification that a plan implementing the standards only needs to be

notified (not operative) within the timeframe and for the following amendment to the directions to implement the planning standards:

~~Documents of the~~ The local authorities listed below must be amended notify plans and/or policy statements in accordance with section 58I of the RMA within 7 years of gazettal of this planning standard.

2.2.2 Some requested shorter timeframes

Survey and Spatial New Zealand requested a shorter implementation timeframe. They believed larger councils should be required to have an ePlan within two years and smaller councils should have a timetable set for these improvements according to their “means and broadband capability” but within five years. They believed this approach “would mean rolling implementation of the ePlan requirement with priority given to areas where benefit realisation is likely to have the greatest impact”.

Taking a similar view, Isovist believed that all councils, even councils that have recently been through a plan review, can put their operative plans into an ePlan format without needing to relitigate their plan content. They stated that ePlanning should not be tied to the implementation timeframes for the other standards as usability and cost savings can be achieved sooner. They also thought that with the draft ePlan timeframes, given the pace of technology development, councils might buy software to meet minimum needs now and then have to purchase further software later to meet higher specifications required.

2.2.3 Costs of ePlanning for small councils

A number of submitters commented on the cost burden of ePlanning on ratepayers, noting that most ratepayers do not interact with the plans and policy statements.

The submission of Kawerau District Council is representative of the sentiment of many small councils regarding ePlanning. They noted that the aim of the standards is to improve the customer experience, making it easier for customers to interact with and understand plans. Kawerau District Council stated:

...the service we currently provide achieves this aim with customers having direct access to a person for enquiries and easy reference to documents and maps (which are currently available online) ... We suggest that flexibility is incorporated within the planning standards to recognise the uniqueness and difference of each community.

Central Otago District Council stated that they have fewer than 13,000 ratepayers and it believes that the level of ePlan required would put a significant cost burden on them.

Horowhenua District Council stated that the cost of ePlans is:

...greater for smaller local authorities that generally do not have resources available to oversee the development and then ongoing maintenance of an ePlan but which also have a lower number of users likely to benefit from an ePlan.

It also stated that the ePlanning standards will place a burden on its ratepayers, many of whom will never use an ePlan.

Matamata-Piako District Council noted that many small councils have only a few staff with numerous responsibilities; many roles in these councils are the responsibility of just one

employee. It is these staff who would be expected implement the planning standards as well as carrying out their existing roles. For example, at the Matamata-Piako District Council:

...this applies to GIS, web development, and the policy planning role responsible for the District Plan review. The implementation of the Standards will channel a considerable amount of time and resourcing from these staff members. Consequently, the rolling review of our district plan, which is to ensure we meet our community's needs, will be affected by this additional exercise.

Many councils, whether large or small, recognised the challenges the standards could present to smaller councils.

2.2.4 Significant investment in current plans (especially the Auckland Unitary Plan)

Housing New Zealand Corporation (Housing NZ) requested that Auckland Council and Christchurch City Council be excluded from the seven-year timeframe and be required to implement the standards at the next full plan review. They considered that the processes for both plans have been lengthy and expensive and the plans should not be relitigated in the near future as a result of the standards. Housing NZ believed that having a timeframe of the next plan review will better achieve the standards' objective of reducing the cost of creating plans and policy statements. They also noted that they were involved in a significant number of appeals on the Auckland Unitary Plan (AUP):

...including four judicial review proceedings, 26 High Court appeals and 23 Environment Court appeals. While almost all appeals have been resolved, there are still three Court of Appeal appeals that are outstanding. Meaning that it will have been a five plus year process to make the Unitary Plan fully operative.

Making a similar argument about the AUP, Transpower stated:

The corridor provisions in the Auckland Unitary Plan (Operative in Part) were resolved after both Environment Court and High Court appeals ... we consider that it would be appropriate for the National Planning Standards to provide an exemption for certain plans/provisions. In this regard, we consider that it would be appropriate for the Auckland Unitary Plan corridor overlay to continue to apply, and Auckland be exempted from applying any future content-based standards in relation to policies 10 and 11 of the NPSET [National Policy Statement on Electricity Transmission 2008].

The Resource Management Law Association and Greenwood Roche shared Housing NZ's concerns. They too considered that Auckland Council and Christchurch City Council (as well as other councils who have recently completed a major plan change) should be excluded from the standards or at a minimum have 10 years to implement them.

PSPiB/CPPIB Waiheke Inc, AMP Capital Shopping Centres Pty Limited and Stride Property Limited stated that Auckland Council in particular should be given 10 years to implement the standards. They cited the cost to submitters of being involved in this plan and their belief that the Auckland Unitary Plan represents quality planning outcomes. They considered the AUP was:

...developed using a bespoke and intensive statutory process with the aim of producing an integrated plan across the entire Auckland region. Submitters invested significant time and resources to ensure that the process resulted in quality planning outcomes.

The Property Council New Zealand agreed that Auckland should have 10 years to implement the standards.

Hauraki District Council stated that they will have to bring forward their plan review. Currently it is scheduled to begin in 2024, but under the standards it will be required to have notified the changes by 2024. It stated:

This will put pressure on our staff to bring forward the review and will bring forward the costs associated with the review. It also means the cost of the last District Plan cannot be spread over 10 years as anticipated. We do not have the resources to implement the standards within five years.

Environment Canterbury stated that:

...reviewing, reformatting and updating the Canterbury Natural Resources Regional Plan (NRRP) provisions into the LWRP cost Canterbury ratepayers \$6 million, and this was with no appeals to the Environment Court because of the provisions of the Environment Canterbury (Temporary Commissioners and Improved Water Management) Act 2010. The Council will not have the benefit of these provisions after October 2019.

Federated Farmers of New Zealand also considered that the timeframe for implementing the planning standards should be the next full plan review; however, they believed the change should be made for all councils. They cited practicality and cost implications as their reasons for requesting the change.

Meridian was concerned about the stability and certainty of the planning system. It considered that implementation of the standards is likely to be:

...challenging, and particularly the combining of regional plans where there are currently multiple plans of different vintages, formats, and stages of review and change. Meridian considers that implementation will create an unsettled planning framework. Significant uncertainty would be caused for Meridian who rely on plan stability in order to manage and re-consent its existing assets, and plan and develop new generation capacity.

Other private companies and associations echoed Meridian's sentiments. Meridian requested that all councils be able to implement the standards at their next plan review by giving them 10 years for implementation.

2.2.5 Planning hierarchy: impact of regional policy statements on plans

In their submission, Northland Regional Council noted that it is important to be mindful that changes to regional policy statements (RPSs) from implementing the standards are likely to have flow-on effects for local plans. They stated that "the preference would be to amend the RPS first before territorial authorities amend their plans".

Environment Canterbury noted that, in the existing timeframes, they will have to review the Canterbury Regional Policy Statement and the Land and Water Regional Plan at the same time, which may also occur alongside reviews of district plans. They stated that:

...this will hinder our ability to create an integrated planning framework. Councils are required, when developing a district plan or regional plan, to give effect to regional policy statements. If a regional or district plan is developed before the regional policy statement is settled, Councils will have difficulty in giving effect to that document. This risks regional and district plans being out of step with regional policy statements.

The Poultry Industry Association of New Zealand did not agree with the proposed timeframes for implementation. They believed that the standards should be implemented as quickly as possible, or deferred so that they are integrated into the natural cycle of plan reviews, or phased so that regional policy statements and plans are promulgated first, followed by district plans. They considered the last option would “ensure top down consistency and assist with managing ‘consultation fatigue’”.

Otago Regional Council considered that the Ministry has not taken into account the opportunity costs of the standards. They believed that the standards would require a significant review of its RPS (decision notified in October 2016), which could in turn require changes to the regional and district plans in addition to changes required by the planning standards. They requested that timeframes be aligned with plan reviews (with a maximum timeline of 10 years) or, as a minimum implementation, that timeframes for all of the plans and policy statements within the Otago region be extended to seven years.

Bay of Plenty Regional Council also believed that plans should be able to be amended to implement the standards in a way that recognises the hierarchy of planning documents, with RPSs being reviewed first, then regional plans and finally district plans. They considered this approach is especially important for the definitions, which will have a flow-on effect.

Manawatu District Council (MDC) noted that incorporating the standards required changes to regional planning documents that could influence the timing of district plan changes. They stated:

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.

Whangarei District Council noted that:

The National Policy Statement for Urban Capacity requires a plan change to ensure feasible capacity within 12 months of completing the capacity assessment. The Northland Regional Policy Statement requires plan changes within 2 years of the operative date to implement protection of biodiversity and hazard management. Northland Regional Council have a 7-year timeframe to meet the Standards, there is a risk that the district plan will fall out of step with the regional direction.

2.2.6 Adding particular councils to the seven-year list

West Coast Regional Council noted that it was omitted from the seven-year list as the proposed West Coast RPS will have a decisions version publicly notified by April 2019.

The oil companies¹ noted that the list of councils having seven years for implementation needs to be extended to include Otago Regional Policy Statement, Northland Regional Plan and Palmerston North District Plan.

¹ Mobil Oil New Zealand Limited, Z Energy Limited, BP Oil Limited.

Manawatu District Council noted that they have recently restructured and republished their district plan (without amending the content) and created a new online district plan. Therefore they requested 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”.

Waikato District Council (WDC) stated that they notified a plan review in July 2018. This means that they do not meet the criteria for the two-year extension to allow seven years for the implementation of the standards as they have not notified decisions within the timeframe. The council noted its understanding that they are the only local authority in the country that has notified a proposed plan between the release of the standards and the expected date of gazettal of 18 April 2019. They believed that “in the circumstances, there is no reason why WDC should not be included in the list of other councils who have seven years to implement the Standards”. Although it does not meet the criteria, they notified their proposed plan on 18 July 2018 and expected to have a decisions version of it ready by late 2019 or early 2020. They believed that appeals on the plan will likely take two to three years, giving them effectively only 12 months to implement the standards. They gave several reasons why this timeframe is not ideal, including cost, resourcing, the importance of the district because of its proximity to Auckland and Hamilton, confusion for the public and possible loss of public confidence in the council.

Hauraki District Council pointed out that their district has a high level of socio-economic deprivation and therefore they cannot pass on implementation costs to ratepayers. They suggested increasing the timeframe for implementation to 7–10 years, or that Hauraki District Council “(and other rural councils) be added to the list of councils given 7 years to implement the changes, or that the Ministry provide us (and other rural councils) with financial support to undertake these changes”.

New Plymouth District Council (NPDC) stated that they are ready to adopt the standards as soon as possible. It then noted:

However, there is some risk to NPDC if there are significant changes to the National Planning Standards or the matters identified in this submission are not incorporated. As a precautionary measure NPDC requests that it is provided with a seven year gazettal period, as for recently reviewed District Plans.

Allison Tindale suggested that, given the number of councils that have recently reviewed their plans, consideration should be given to whether a seven-year timeframe for every council is a better approach.

Whakatāne District Council requested that the criteria for implementation extensions be amended to include councils that have made plans operative between April 2016 and April 2019. They considered this appropriate as:

...changes are still being made during the decisions version process, and that the 10 year review starts from when the plan is operative under section 79 of the Resource Management Act, 1991. Whakatāne District Council’s district plan was made operative June 2017 and therefore would be considered under the timeframe extension of 7 years.

Hastings District Council asked that the criterion for seven years to implement the standards be amended to allow “its September 2015 decisions date and that it be granted a two year extension, giving it 7 years to implement any standards”.

As Central Hawke’s Bay District Council is in the process of reviewing its district plan (now and during the introduction and implementation period of the standards), they requested seven years to implement the standards. They stated, “An extension to seven years will provide some financial respite for the Council after meeting the costs incurred in reviewing the Plan.” Alternatively they requested a 10-year timeframe to align with the statutory review of plans under the RMA.

Opotiki District Council stated that they notified the decisions version of its district plan on 1 May 2018 and therefore meets the criteria for an extended seven-year implementation timeframe.

2.2.7 Unique situations of submitters

Buller District Council noted that the Local Government Commission was currently considering whether the three territorial authorities on the West Coast should have a combined plan. The council stated that, if the decision is 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”. They supported more flexibility in this standard and/or the option to request further time to implement if needed.

The Southland Shared Services Chief Executives Subcommittee noted that the councils in Southland and Te Ao Marama Inc are working towards greater integration of RMA plans. The subcommittee is actively considering the option of integrated planning documents. They noted that the standards provide Southland and Gore district councils with five years to implement the standards and Southland Regional Council and Invercargill City Council seven years. To allow the integration work to progress, the subcommittee asked that the timeframes for implementing the standards be aligned across the Southland councils, so that all councils are required to implement the standards within seven years.

With similar sentiments, the Joint Southland Councils' technical submission noted that:

The Southland District Plan decisions were released in October 2014 and several appeals were received on the District Plan. The Court effectively placed the appeal process on hold requiring that the higher order Regional Policy Statement appeals were resolved first. This resulted in a substantial delay in resolving the District Plan appeals with the Southland District Plan not being made operative until January 2018 (after the RPS was made operative).

2.2.8 Commitments to rolling reviews of plans

Queenstown-Lakes District Council (QLDC) supported an extended timeframe for councils that are currently engaged in a plan review process. However, they considered the proposed seven-year deadline would not provide sufficient time for a number of authorities to implement the standards. They stated:

Given the litigious nature of the plan making process in the Queenstown Lakes District, and the staged review approach being adopted, it is unlikely that all appeals will be resolved prior to the standards needing to be implemented. QLDC would then have to embark on a District Plan Review almost immediately after completing one. MfE should amend these timeframes so that the standards are required to be implemented as part of the next plan review process. This would enable a more efficient transition, particularly for Council’s which are undertaking a staged or rolling plan review.

Upper Hutt City Council is committed to a rolling review of its plan. They considered that, for rolling reviews, the standards should allow the following timeframes.

- For chapters that have not been reviewed within the three years before the National Planning Standards are gazetted, the council has seven years to implement the standards.
- For chapters that have been reviewed within the three years before the National Planning Standards are gazetted, the council has 10 years to implement the standards.

The council believed that this timing would bring the implementation of the standards more in line with the RMA 10-year review cycle and would help to address the costs of re-opening recently completed plan changes.

2.2.9 Many submitters requested amending timeframes to next full plan review

Andrew Cave, Central Hawke’s Bay District Council, Kāpiti Coast District Council, Marlborough District Council, Taranaki Regional Council and Waimakariri District Council supported extending the timeframe to implement the standards to align with the next required district plan review (10 years). They considered that this timeframe would enable them to implement the standards in a cost-effective manner that aligns with current RMA timeframes.

Taranaki Regional Council agreed that a 10-year timeframe is appropriate because:

- in their current form, the draft standards will increase litigation risks and costs, not reduce them
- it would allow councils to adopt the planning standards or consider them in the context of other policy changes in a fully integrated way
- it would be more cost-effective for councils by giving them more time and resources to commit to existing priorities rather than diverting resources away from more urgent policy work.

The Canterbury Mayoral Forum² believed that the implementation timeframes will cause issues for councils while they are reviewing their district plans. They named Timaru, Selwyn, Mackenzie and Waimakariri district councils as examples of councils that have started their district plan reviews. The forum stated that these councils are to notify their proposed district plans around 2020–2021. They believed that any plan implementing the standards must be fully operative to meet the requirements of the standards and, therefore, requested amending the timeframe to 10 years.

Dunedin City Council believed that the standards should be implemented in the following way:

- Stage 1: A pilot programme testing the standards with a range of plans and policy statements (by volunteering local authorities) and funded by the MFE, to ensure the Standards deliver the desired outcomes.
- Stage 2: Review of pilot testing
- Stage 3: Revision and improvement of the Draft Standards
- Stage 4: Consultation on the revised Draft Standards and amendment pre-gazetting

² The Canterbury Mayor Forum includes representatives from Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki district councils, Christchurch City Council and Canterbury Regional Council.

- Stage 5: Implementation commencing within 10 years at the next review (if the Standards are compulsory).

With a similar view, Local Government New Zealand recommended:

- (1) Focus on district plans;
- (2) Pare back the Standards as they relate to regional planning instruments;
- (3) Increase the length of time that local authorities have to implement the Standard to 10 years;
- (4) Align the mandatory requirements with the plan review cycle, allowing integration of changes that require the Schedule 1 process with the plan review cycle. Consequential amendments can be made separately;
- (5) Reconsider the definition of “consequential amendment” in the next set of amendments to the RMA.

2.2.10 Councils will have to prioritise competing national direction requirements

Auckland Council believed it is questionable whether it is in the national interest for the council to meet the timeframes for implementing the standards:

...given that this would reduce the capacity of Auckland to undertake other necessary planning work during this time. Specifically at risk would be the incorporation of the Hauraki Gulf Island district plan provisions into the Unitary Plan, the implementation of the national policy statement and national environmental standards programme and plan changes needed to provide for growth across greenfield and brownfield locations.

Auckland Council requested 10 years to implement the standards.

Sharing similar concerns, Tauranga City Council stated that they are preparing two plan changes for new urban growth areas so that they can notify those changes in 2019:

...after two years of intensive planning work in partnership with landowners and affected persons. As a Council that is facing high growth demands, it is a priority that these plan changes be progressed as soon as possible and that they be in a format that is consistent with the current plan so that development can commence.

The council then stated that if the implementation of the planning standards is required shortly after these plan changes, this could impact on the development of these urban growth areas. They believed that if the standards could be implemented as part of the review of the Operative Tauranga City Plan, it “would allow for growth pressures to be addressed in the short term ahead of the National Planning Standard related changes”.

Local Government New Zealand reiterated this view, noting that “Councils have advised they will be forced to make a choice as to whether they implement the Standard or give effect to other national instruments.”

Waipa District Council noted that the scheduled timing for gazettal and implementation of the standards:

...should be considered together with other nationally led changes to the local council planning realm. These include currently for this Council, the National Policy Statement for Urban Development Capacity, National Environment Standard for Telecommunications

and Plan Change 2 to the Waikato Regional Plan under the National Planning Standard for Freshwater Management. Any long term financial benefit of having National Planning Standards to local councils is rather intangible at this stage.

Greater Wellington Regional Council (GWRC) considered that, if the standards are implemented in the form consulted on and:

...at the stage GWRC is at in the regional plan development, we will be forced to make a choice when implementing national direction; the national planning standards or the National Policy Statement for Freshwater Management (NPS-FM) obligations to maintain and improve water quality. A substantial increase in work load and costs and a subsequent resourcing shortfall leads to the inevitability that we may no longer be able to meet the deadline of 2025 for implementing the NPS-FM.

2.2.11 Possibility of needing a Schedule 1 process for definitions

A number of councils assumed that changes to rules required as a result of the definitions would be outside the scope of consequential amendments so they would need to use the Schedule 1 process to implement them. They expressed concern about the prospect of opening up their plans to further litigation and associated risk and cost.

The Canterbury Mayoral Forum considered that the:

...inclusion of definitions in the Planning Standards will mean that in many cases, details of rules and their activity status will need to be reviewed and adapted to reflect the new definitions. Further, the RMA limits consequential amendments only to those that avoid duplication and conflict with the mandatory amendment. As this exemption is relatively narrow in scope, and as many rules are likely to require significant amendments to reflect the amended definitions while retaining the original intention of affected rules, Canterbury Councils anticipate having to use Schedule 1 RMA processes as an invariable consequence of implementing much of the Planning Standards.

Some councils and businesses (Northland Regional Council, Tauranga City Council and Greenwood Roche) asked for more time to implement the definitions so the changes could be synchronised with a plan review. This would enable councils to consider the definitions and any changes to rules in context of a full review and reduce time and cost. Conversely, Thames Environmental Consultancy thought the timeframes were too long and requested the definitions be implemented immediately on gazettal of the standards so that users benefit from having consistent definitions across plans more quickly.

Some submitters (Dunedin City Council, Canterbury Mayoral Forum, Bay of Plenty Regional Council) asked for more testing and review, or a transitional period, before implementation to refine the definitions or iron out unintended consequences and effects on plans.

2.2.12 Support critical to effective implementation

Many submitters noted that councils would need a lot of support from the Ministry to implement the standards, especially in regard to ePlans. For example, Central Otago District Council highlighted that the development of an ePlan is new and different from normal work for many councils and will require significant additional expertise and resource. They asked for “financial and technical support to implement these changes, as it is an unfair burden on an already stretched ratepayer base”.

Rotorua Lakes District Council gave 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.

2.2.13 Other submissions

Horticulture New Zealand asked for more moderate timing for implementing the standards. As they lack the resourcing to be involved in planning processes around the country, they were concerned that they will not be able to handle the volume of plan changes occurring. They requested that the implementation occur region by region, “reducing travel (and cost) to multiple locations across the country within short timeframes”. They also asked the Ministry for the Environment to provide “an anticipated timeline showing in which year each council anticipates public engagement on their planning documents over the 7 year period. This would allow HortNZ and others to plan budgets, staffing and consultancy support”.

Te Rūnanga o Ngāti Awa requested that Whakatāne District Council is not added to the seven-year list as its newly operative district plan does not include important tangata whenua matters that the draft standards list. They considered that the requirement for the district council to amend its plan to include these important matters would have great benefits for the Whakatāne district community.

Gisborne District Council asked for the ability to extend the timeframes in exceptional circumstances. They gave as an example “where notification of a significant plan change or new proposed plan that will implement the planning standards is imminent. These circumstances could be described in the planning standards.”

Greater Wellington Regional Council believed that there “is a more compelling argument for the planning standards to guide district plans only. The planning standards have recognised that there are fewer district plans available, with less cross boundary issues, and an integral difference in the way the RMA is addressed”. They then stated that they cannot see how the standards benefit regional planning.

2.3 Analysis

We have grouped the submissions on implementation timeframes into several topic themes. We address each theme in turn below.

2.3.1 Greater national direction may delay implementation

Many submissions noted the increasing impact of implementing multiple forms of national direction, including:

- National Policy Statements on Freshwater Management and Urban Development Capacity
- National Environmental Standard for Plantation Forestry

- upcoming national direction on marine aquaculture, tyres, biodiversity, versatile soils and high-class land, and updated freshwater
- RMA review and reform
- Urban Development Authority projects
- three-waters review and management changes.

Submitters considered that the national direction above has on-the-ground positive effects on the built and natural environment, whereas the standards make using and making plans more efficient. Councils indicated they may have to prioritise implementation of other national direction over implementing the standards.

We agree that councils face a lot of pressures from central government. Therefore, we recommend reconsidering the implementation timeframes to make them more nuanced and giving councils more flexibility about how they cope with these pressures.

2.3.2 Recognising the hierarchy of planning documents

As noted in the submission analysis (section 2.2), councils like Northland Regional Council and Environment Canterbury would prefer an approach that aligns RPSs with the standards before district plans implement them. We agree that it would be beneficial for regional and district plans to reflect the way the relevant RPS provisions incorporate the standards, particularly the definitions.

We consider that one way to try to ensure that lower-level planning documents reflect RPSs is to require regional councils to amend their RPSs first within a shorter timeframe. We consider that councils implementing the standards for RPSs within three years would then need a longer timeframe for all regional plans to give effect to the standards. Therefore we propose a 10-year timeframe for implementing the standards in regional plans.

We consider that this timeframe recognises that many regional plans have highly variable structures and will need considerable changes to reach national alignment and that many councils will be combining multiple regional plans into one plan. The timeframe also recognises that regional plans must give effect to extensive national direction, both now and in the near future.

2.3.3 Complex issues for unitary councils

Several submissions from AUP contributors were consistent in wanting the AUP to 'rest' for a while before being changed significantly.

Allowing Auckland Council 10 years to implement the standards recognises that the AUP is the largest and most complex RMA plan in the country. A 10-year timeframe also recognises the high growth and planning pressures on Auckland Council. From discussions with Auckland Council staff, we expect that some of the standards will be incorporated into the AUP earlier than 10 years as they progress various plan changes.

As unitary councils are required to prepare RPSs and regional and district plans, they have the benefit that reviews are undertaken in a logical way that takes into account the requirements of the RMA. However, these councils also have complex plans that cover the whole suite of RMA plans and they are required to implement all forms of national direction.

We accept this situation and recommend allowing a 10-year timeframe for all unitary councils to implement the standards.

The proposed 10-year implementation timeframe does not change the existing requirements that section 79 of the RMA places on councils. That is, all councils are still obliged to review their plans within 10 years. The standards do not amend that requirement.

2.3.4 Inefficiency of implementing some standards, particularly the Definitions Standard, before a full plan review

The costs of implementing the standards outside of a full plan review were a main theme in submissions.

Although they can carry out consequential amendments to plans to take account of the standards, many councils believe that the new Definitions Standard, will require an RMA Schedule 1 plan change process. This could open up established plan provisions to new challenges.

We agree that the Definitions Standard will have a significant effect on existing plan provisions. Implementing this standard and identifying all of the flow-on amendments to the plan will be time consuming and would be more efficient if carried out through a full plan review. Our economic analysis reflects this, identifying the cost:benefit ratio of the Definitions standard as 1:1.2 with three- and five-year implementation timeframes, which increases to 1:2.9 with a 10-year timeframe.

Councils considered that their ability to make consequential amendments under the RMA without a Schedule 1 process is reasonably narrow, making a Schedule 1 process necessary. We will prepare guidance on this issue to help councils make the appropriate decisions about consequential amendments.

For these reasons, we recommend giving district councils an extra two years to implement the Definitions Standard. In this way, their implementation of the Definitions Standard would align better with existing plan reviews.

2.3.5 Small councils implementing ePlans within five years could be costly and inefficient

As noted in section 2.2, submitters highlighted the inefficiency of implementing ePlans, particularly for smaller councils (some with low development, low-income ratepayers and/or low growth rates). The proportional upfront and ongoing costs on ratepayers in smaller councils are much higher, while their smaller populations – who are often rural and elderly – are less likely to use ePlans. A number of these councils considered the baseline e-delivery requirements are satisfactory for their ratepayers to interact with local RMA plans.

The upfront costs of ePlans vary depending on the level of customer support required, but can range from \$40,000 to over \$100,000. Annual maintenance costs can range from \$7,000 to \$35,000 per council. The exact cost depends on support requirements and the complexity of ensuring the plan is up to date and secure. One council staff member's time is generally dedicated to the ePlan for the first three to six months, before efficiencies start to reduce this time requirement. For a small council, this cost can equate to a rates increase of 1 to 2 per cent.

Councils expressed concern about the costs of implementation competing with other increasing demands on revenue collected through rates, such as ageing infrastructure replacement, climate change adaptation, earthquake resilience, three waters costs, etc.

We accept these arguments in favour of a more flexible ePlan requirement for smaller councils with a small base and low levels of plan interaction. Our economic analysis supports these arguments. We recommend giving small councils (with fewer than 15,000 residential ratepayers) 10 years to implement the ePlan standards. In total, 23 councils³ currently meet this criterion.

We also recommend exempting the Outer, Subantarctic and Chatham Islands⁴ from the ePlan standards. This exemption recognises their very small populations (Outer Islands about 37 permanent residents, Chatham Islands about 640 permanent residents, Subantarctic 0), and the very small level of plan use relative to ePlan costs.

2.3.6 Longer processes for combined district plans

Since Buller District Council made its submission, the Local Government Commission has decided that a combined district plan for the West Coast region will be prepared under the guidance of a joint committee.⁵ Buller District Council expressed concerns about having to implement the standards while this combined district plan is being prepared.

We support combined plans as an efficient way to standardise planning provisions and share costs across smaller councils with common interests. To provide more flexibility to facilitate combined plans, we recommend allowing seven years to implement the standards for councils that will notify a combined district plan (i.e. notification between April 2019 and April 2026).

2.3.7 Issues that do not require changes to implementation

As noted in section 2.2, Waikato District Council asked for seven years to implement the standards as it notified a new proposed district plan in July 2018. We consider that the standards have been signalled for a number of years, particularly since April 2017 when the Resource Legislation Amendment Act 2017 was passed and discussion documents were released for public comment.

We consider that most councils due to notify a proposed plan during 2018 or 2019 chose to align the notification to soon after gazettal of the standards. Many councils have also been preparing their plans to reflect the draft proposed standards.

³ Central Hawke's Bay District, Central Otago District, Clutha District, Gore District, Hauraki District, Hurunui District, Kaikoura District, Kawerau District, Mackenzie District, Manawatu District, Matamata-Piako District, Opotiki District, Otorohanga District, Rangitikei District, Ruapehu District, South Waikato District, South Taranaki District, Waimate District, Stratford District, Tararua District, Wairoa District, Waitaki District and Waitomo District.

⁴ Outer Islands planning documents are prepared by Department of Internal Affairs and Department of Conservation. The Department of Conservation is responsible for planning in the Subantarctic. Chatham Islands Council is responsible for the Chatham Island Resource Management Document, which Environment Canterbury staff prepare.

⁵ Local Government Commission. 2018. Final proposal for a combined West Coast District Plan. Wellington: Local Government Commission. Retrieved from <http://www.lgc.govt.nz/the-reorganisation-process/final-proposal-for-a-combined-west-coast-district-plan/> (26 January 2019).

We do not recommend amended timeframes for Waikato District Council. However, our recommendation to allow a further two years to implement the Definitions Standard should give this council the flexibility it needs. We will work with council staff to explore options for implementing the standards alongside or soon after their current proposed plan process.

District councils undertaking rolling reviews may also find implementing the standards difficult. A number of councils such as Upper Hutt City Council are committed to rolling reviews of their district plans so that ongoing updates continue to be affordable even though this may result in somewhat disjointed and less integrated plans for a period of time.

We recommend no change to the timeframes in this instance. Instead, we recommend that the Ministry continues to work with councils that have rolling plan reviews to establish which standards can be implemented earlier and which are better done as a separate plan review.

We have amended the list of district councils who have seven years to implement the standards to reflect submissions where councils meet the criteria.

2.3.8 Other submission points

Several submitters are mistaken in their assumption that any plan or policy statement that implements the standards must be operative to be considered as having implemented the standards. A plan only needs to be notified to have implemented the standards. This means that the plans that the Canterbury Mayoral Forum identified in its submission will meet the criteria for the timeframes given. This also means that the amendments to the direction wording that Christchurch City Council suggested are not necessary.

We do not agree with Manawatu District Council's request to include councils that have republished their plans in the seven-year timeframe. Republishing a plan is not an RMA concept and is not defined by the RMA or best practice; therefore, we consider it would be inappropriate to link a timeframe to such a term.

While Transpower argued that it would be appropriate for the standards to provide an exemption for certain plans and provisions, we consider this is unnecessary for the current standards as provisions such as those Transpower mentioned should not be substantially affected by the changes proposed. However, it may be considered appropriate if future content standards are promulgated.

We do not agree with Horticulture New Zealand's suggestion to implement the standards region by region. In some regions, this approach would trigger plan reviews long before they are due. We consider that the proposed timeframes are appropriate.

In regard to Horticulture New Zealand's request for an anticipated timeline showing the year in which each council anticipates public engagement on its planning documents, we will look into the feasibility of such a list once the standards are gazetted.

Te Rūnanga o Ngāti Awa requested that Whakatāne District Council is not added to the seven-year list. As Whakatāne District Council does not meet the criteria for the seven-year timeframe, we are not recommending adding this council to the list.

2.4 Recommendations

We recommend that the following implementation timeframes previously consulted on remain unchanged:

- five years for most district councils and seven years for district councils that have recently completed a plan review to implement most of the standards
- one year for all councils to implement the baseline e-accessibility standards.

This is because we consider that a lot can be achieved by more nuanced changes to the timeframes for district plans as addressed below. We have also significantly amended the baseline e-accessibility standards so that they are easier to achieve within the one-year timeframe.

We also recommend amendments to the timeframes to address specific issues and opportunities as follows.

- We recommend providing an opportunity to manage the workload of regional and unitary councils by requiring that RPSs be implemented within three years (ie, bring the RPSs forward), but providing a longer timeframe (10 years) for all other regional plans and for unitary councils preparing unitary plans. With RPSs amended first, some plans will implement the standards in a shorter timeframe, while the longer timeframe for regional plans provides councils with greater flexibility to decide how to implement the standards alongside the multiple plan changes anticipated to reflect other national direction.
- We specifically recommend giving Auckland Council 10 years to implement the standards, irrespective of decisions made for other unitary councils. Multiple submitters noted that, because of the significant investment involved in developing the AUP, plan users should be allowed to benefit from the certainty it provided for at least 10 years.
- District councils considered that the definitions will require further changes to many parts of their plans (these often cannot be considered consequential). We recommend retaining the five- and seven-year implementation timeframes for all other standards for district councils, but recommend providing flexibility with a further two years for implementing the Definitions Standard.
- We recommend giving councils that are collaborating on a combined district plan seven years to implement the standards. This timeframe recognises the efficiencies gained along with the longer initial inception period of combined district plan processes.
- Smaller councils noted the cost of implementing an ePlan. We recommend a longer implementation timeframe (10 years) for ePlans for councils with fewer than 15,000 ratepayers. We also recommend exceptions from the ePlan requirements for plans prepared for the Chatham Islands, Outer Islands and Subantarctic Islands, which all have very small populations.

We also recommend creating an Implementation Standard. This standard sets out the timeframes above and has been created as the last of the standards. This was considered more efficient than having the implementation timeframes for each standard at the beginning the standard as in many cases this was unnecessarily repetitive.

Figure 1: Recommended implementation timeframes

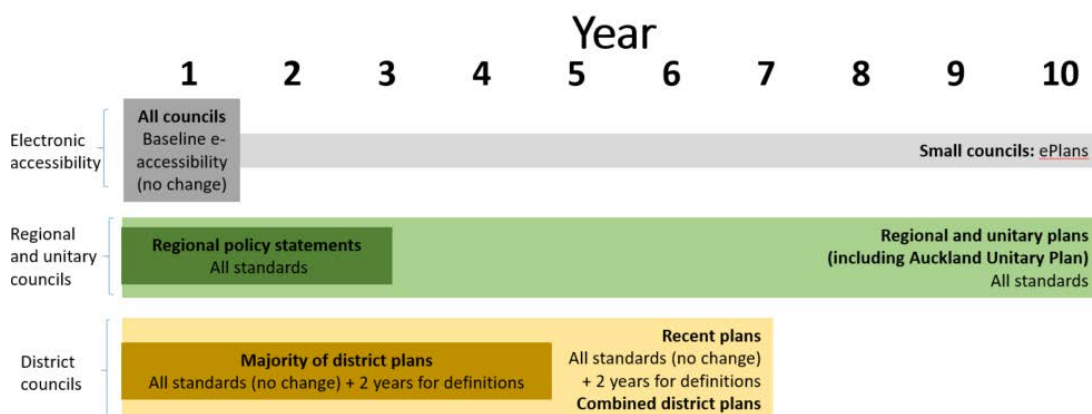


Table 1: Summary of recommended changes to implementation timeframes and the reasons for them

Recommended changes	Explanation	Reasons
No change for most councils to previously agreed timeframes	<p>1 year for baseline e-accessibility standard.</p> <p>5 years for most district councils to implement the standards. 7 years for district councils that have recently completed a plan review.</p>	<p>This was the option consulted on in the draft standards.</p> <p>This option presents greater efficiencies than those achieved with the default timeframes in the RMA as it brings most councils closer to scheduled plan reviews and allows integrated implementation of all standards.</p>
Regional councils change RPS first Then regional plans and unitary plans⁶ up to 10 years	<p>Regional councils have 3 years to amend their RPS to implement the Standards.</p> <p>Regional and unitary councils must implement the standards in any new plans or within 10 years (whichever is earlier).</p>	<p>District and regional plans must give effect to RPSs. This is easier if the RPSs are already aligned with standards (especially the definitions).</p> <p>RPSs can be amended more quickly than other plans as they tend to be less complex and do not include rules.</p> <p>Regional and unitary plans face significant changes from national direction and central government policy.</p> <p>There are a wide variety, range and number of regional and unitary plans. Some of them will need to change significantly to comply with the standards.</p> <p>This option was tested with regional council policy managers in October 2018, and no wholesale disagreement was noted.</p>
Definitions in district plans have an extra 2 years	The Definitions Standard must be implemented in a new proposed plan.	Most councils are risk averse and consider that they will need to follow a full Schedule 1 process to implement the Definitions Standard (because they consider their ability to carry out consequential amendments to be narrow). All other standards and their consequential changes either will not need a Schedule 1 process or the scope of the process will be limited (eg, zones).

⁶ 'Unitary plans' are combined regional and district documents that unitary authorities prepare.

Recommended changes	Explanation	Reasons
<p>7 years for councils developing a combined district plan</p>	<p>7 years from gazettal for councils that develop a combined district plan (ie, there is a council resolution, memorandum of understanding and/or similar statutory obligation) combined plans under RMA s80(3)–(6).</p>	<p>Councils have stated that implementing the Definitions Standard will be the most time-consuming of all the standards as identifying all of the flow-on effects from a change to a definition will be resource intensive.</p> <p>Regional councils already have 10 years to incorporate definitions into a plan review (as per recommendation above).</p> <p>Requiring new plans to incorporate the new definitions ensures early implementation where this is efficient.</p> <p>Councils going through joint council processes to merge multiple RMA plans generally need more time.</p> <p>This timeframe promotes the long-term efficiency of combined plans.</p> <p>It currently applies to the Wairarapa and West Coast councils.</p>
<p>10 years for small councils to develop an ePlan</p>	<p>Gives district and unitary councils with plans serving fewer than 15,000⁷ residential ratepayers (Appendix 2) 10 years to implement level 5 ePlan requirements, excluding councils preparing combined district plans.</p>	<p>These councils have low ratepayer bases and often do not have ePlanning and GIS expertise available, and their ratepayers have low RMA plan.</p> <p>Allows more time for broadband-speed uptake in rural areas and small communities.</p> <p>Gives these councils more time to fund ePlans.</p>
<p>Exemptions from ePlans for plans serving very few residents</p>	<p>Exempts the Outer Islands (managed by the Department of Internal Affairs and Department of Conservation), Subantarctic Islands (managed by Department of Conservation) and Chatham Islands from the ePlan level 5 standard.</p>	<p>Recognises the very small populations (Outer Islands 37, Chatham Islands 640 and Subantarctic Islands 0) and limited plan use in these areas.</p> <p>The level 5 standard is not justified by the amount of use the plans get.</p> <p>These plans can be quickly read and understood.</p>

⁷ Both the Wairarapa and West Coast councils are preparing or have a combined plan. These councils serve more than 15,000 ratepayers. The cost of these ePlans will be shared across the councils, so these councils would be excluded from this extension.

3 General implementation

3.1 Background

In the consultation document, we asked stakeholders to submit their views on other implementation matters.

3.2 Submissions

We received a total of 19 submissions from a range of stakeholders who gave their views on the implementation process of the National Planning Standards.

3.2.1 Suggested provisions

Stakeholders requested the following support in implementing the standards:

- extensive communication between the Ministry and relevant stakeholders, including the general public
- implementation training
- specific training for iwi and hapū (Matamata-Piako District Council)
- regular workshops (Manawatu District Council, Perception Planning Ltd, Resource Management Law Association)
- on-the-ground or one-on-one support (Resource Management Law Association)
- planning review service (Manawatu District Council, Resource Management Law Association, Rotorua Lakes Council, Tauranga City Council)
- legal review service (Manawatu District Council, Perception Planning Ltd)
- financial support (Clutha District Council, Hauraki Council, Rotorua Lakes Council, Queenstown-Lakes District Council)
- incentives (Property Council New Zealand)
- pilot testing on smaller councils (Dunedin City Council)
- dedicated contactable team (Tauranga City Council)
- peer networking and collaboration (Kāpiti Coast District Council, Manawatu District Council, Perception Planning Ltd, Rotorua Lakes Council)
- support for communicating with the public (Auckland Council)
- consideration around when and how Schedule 1 should be used.

3.2.2 Support for smaller councils

Nine of the 19 submissions outlined specific targeting for smaller councils and the extra financial and logistical support they would require. Dunedin City Council suggested pilot testing the standards on several smaller councils to establish the extent of the support they will require before implementing the standards across all councils.

3.3 Analysis

We are working on an implementation package for the standards. This will include guidance as noted in section 4, one-on-one support and training, as well as other methods. The Ministry will continue to have staff with the job of helping councils to implement the National Planning Standards.

We recommend considering all of the suggestions above when deciding on the implementation package.

4 General guidance

4.1 Background

In the consultation document, we asked stakeholders to submit their views on additional guidance required to support the National Planning Standards.

4.2 Submissions

We received a total of 14 submissions with requests and opinions on additional guidance required to support the National Planning Standards. This guidance is not related to specific standards. The report on each standard analyses guidance requests related to that standard.

Many of the views presented overlapped with the submissions on implementation. The key themes and ideas relating specifically to guidance are presented below.

4.2.1 General opinion

The overall view of the submissions received, especially those from councils, is that there is a definite need for a comprehensive set of guidance materials to be released before and/or concurrently with the gazettal of the standards to ensure councils are properly equipped to begin implementation. Nine of the 14 submitters mentioned this in their submissions.

4.2.2 Specifically requested materials

Submitters asked for the following specific documents or information:

- a 'road map' of where plan sections have moved to (Heritage New Zealand Pouhere Taonga)
- guidance material on community and industry input (Fulton Hogan Limited)
- document identifying how councils and tangata whenua will work together towards resource consent processes (Horticulture New Zealand)
- RMA plan development guidance for councils (Property Council Limited)
- template showing how all standards look when brought together (Resource Management Law Association)
- guidance on scheduling or staging (Resource Management Law Association, Manawatu District Council)
- guidance for district councils currently undertaking plan reviews (Whangarei District Council)
- information on how to align digital and printed mapping information needs (Joint Southland Councils' technical submission)
- best-practice examples or worked examples (Manawatu District Council)
- clear information on the relationship between private plan changes and the standards (Manawatu District Council)

- clear information on how to evaluate resource consent applications (Porirua City Council)
- information distinguishing between changes that the public can have a say on and the changes that they cannot (Allison Tindale)
- guidance on non-mandatory text (Allison Tindale)
- guidance during decision-making processes (Porirua City Council)
- guidance on how to implement the standards through a rolling review (Upper Hutt City Council, Whangarei District Council).

4.2.3 Other comments and concerns

Outside of specific materials, the submitters also made several comments with their concerns or thoughts about guidance material.

Far North District Council was concerned that lack of substantial support for councils could result in poor environmental and economic outcomes.

Manawatu District Council stressed its concern over private plan changes. The council felt it could be put in a position of processing private plan changes ahead of the standards being implemented, which would put more strain on costing and resourcing. For this reason, it asked for guidance on the matter.

Marlborough District Council requested proper communication support to all councils on standards content and reasoning for implementation.

Many expressed concern over the funding of implementation. They considered that having comprehensive guidance before councils implemented the standards was important to ensure proper distribution of resources once implementation begins.

4.3 Analysis

We will work towards creating a comprehensive package of guidance for implementing the standards. Some of this guidance will be available at the time of gazettal, while some will be prepared as soon as possible after gazettal. We will take all of the suggestions above into consideration when deciding on what guidance to produce.

5 Future standards

5.1 Background

In the consultation document, we asked stakeholders to submit their thoughts and suggestions on what they would like to see in future planning standards. The consultation document asked the following question:

Q2: What topics or matters should be investigated for future planning standards?

5.2 Submissions

We received a total of 55 submissions from a range of stakeholders, mostly business and industry groups, on future planning standards. The general consensus of the submissions was that there is a lot of potential to develop the standards further and in greater detail. Most of the submissions received focused strongly on creating future standards that were specific to their business, group or industry. Council submissions provided more general and diverse suggestions for future standards. The main submission topics are summarised below.

5.2.1 Opposition

A group of six submitters did not support future national planning standards and asked that standards dealing with substantive matters such as the content of rules not be introduced.

Christchurch International Airport Limited opposed any standardisation of objectives, policies and rules in the Airport Zone.

5.2.2 Utilities

The largest amount of feedback was about model network utilities provisions that infrastructure providers were preparing. Of the 55 submissions received on future submissions, 18 specifically addressed this work. Twelve of them supported further development of these provisions into a National Planning Standard.

The main view among the submitters was the need for a consistent framework that is flexible to geographical variation, such as areas of outstanding natural landscape. Submissions received from businesses and industry groups, such as Vodafone, 2degrees and Spark, strongly supported a utilities standard, believing that the standard would allow for better future industrial development throughout the country.

Most of the opposition to the utilities standard came from councils, who were concerned about the extra cost and level of work required to implement it. Manawatu District Council considered that the benefit of such a standard may not outweigh the work required as it had recently reviewed its utility provisions.

Far North and Tauranga district councils were concerned that there had not yet been enough consultation or testing on the topic.

5.2.3 Noise

The topic that was next most frequently mentioned related to noise standards. Most submitters believed that, while the current noise standards are a suitable starting point, going forward they should be further standardised nationwide. Almost all noise-related submissions considered a noise limits standard is needed. Christchurch International Airport Limited specifically outlined its need for noise-sensitive provisions and zoning within the immediate area of the airport to minimise any possible negative impact that could come from a detailed noise standard.

5.2.4 Tangata whenua

Two submissions were received on tangata whenua provisions for future standards. The main feedback was a request for councils to integrate tangata whenua more explicitly throughout the planning processes. Examples of suggestions from the Papa Pounamu and Taranaki Whānui submission are to integrate an indigenous urban landscape framework into plans, and to include a te reo Maori chapter and a chapter on Te Mana o Te Wai.

5.2.5 Landscapes

Several submissions noted the need for planning standards that better define and identify significant outstanding natural landscapes, significant natural areas, significant areas of heritage and areas of landscape that require protection as a matter of national importance.

5.2.6 Other

Some of the other points in the submissions related to implementation. Some councils (Tasman District Council, Matamata-Piako District Council) expressed concern over future standards being implemented not long after the first set is introduced.

Waimakariri District Council noted a lack of focus on sustainability throughout the standards. It strongly supported more direction towards future standards that deal with sustainability.

Fulton Hogan Limited, Winstone Aggregates and J Swap Contractors Limited all supported the development of comprehensive standards for quarries and their associated activities.

Morphum Environmental Ltd proposed the introduction of 'exception clauses' to deal with uncertainty over the applicability of a standard nationwide.

The Retirement Villages Association of New Zealand suggested a bespoke framework for retirement villages.

The New Zealand Defence Force would like specific provisions for temporary military training activities to be included in a future version of the planning standards. The Joint Southland Councils' technical submission supported this suggestion.

Bunnings Limited and Woolworths New Zealand Limited supported future standards that provide zone content addressing common core planning issues in a consistent manner such as:

- district-wide activities, for example, parking, traffic and signs
- district-wide amenity matters, for example, landscaping and screening required around trade suppliers and supermarkets.

Contact Energy, New Zealand Wind Energy Association and Mercury New Zealand Limited noted New Zealand's move towards a decarbonised economy and an increased need for renewable energy. They all considered that future planning standards in this area would be useful.

The Property Council of New Zealand believed that option three within the Regulatory Impact Summary for the standards should be considered in the future. It suggested including as many metrics as possible along with priority zone objectives and policies.

Other suggestions for future standards included:

- earthworks (Harrison Grierson Ltd)
- reverse sensitivity (ACI Operations New Zealand Limited)
- air quality (ACI Operations New Zealand Limited)
- transportation (Fonterra)
- hazardous substances (Fonterra and Joint Southland Councils' technical submission)
- stormwater (Fonterra)
- high-class soils (Horticulture New Zealand)
- consistency in the way resource consents are issued (Trustpower)
- farming (Poultry Industry Association of New Zealand)
- carparking (Whanganui District Council)
- provision of three-waters infrastructure (Woolworths New Zealand Limited)
- contaminated land (Joint Southland Councils' technical submission)
- avoiding and/or mitigating flooding (Morphum Environmental Ltd)
- water-sensitive design (Morphum Environmental Ltd)
- wastewater networks and discharges from these networks (Morphum Environmental Ltd)
- climate change adaptation including sea-level rise and managed retreat (Joint Southland Councils' technical submission)
- coastal inundation (in response to sea-level rise or climate change) (Morphum Environmental Ltd)
- activities within national parks or Department of Conservation-controlled land – and clarification of the approvals under Conservation Act or RMA (Joint Southland Councils' technical submission)
- RMA section 6 matters, such as consistent methodology and provisions relating to outstanding natural features and landscapes, biodiversity and the coastal environment (Dunedin City Council, Hauraki District Council, Joint Southland Councils' technical submission)
- report structure layouts, particularly sections 32 and 42A, right of reply and decision reporting (Queenstown-Lakes District Council)
- development of a standard submissions database, linked to the notified version of the ePlan (Dunedin City Council).

5.3 Analysis

All of the suggestions received are valuable and the Ministry will use them when considering what future standards to pursue. It is likely that any future National Planning Standards will be linked to stated government priorities in the first instance.