

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of submissions and further submissions on the **PROPOSED WAIKATO DISTRICT PLAN** Topic 2: Plan Structure and All of Plan

STATEMENT OF EVIDENCE OF ADAM WILLIAM CHARLES JELLIE ON BEHALF OF POKENO VILLAGE HOLDINGS LIMITED (SUBMITTER NO. 368 / FURTHER SUBMITTER NO. 1281)

PLANNING

1. INTRODUCTION

Qualifications and experience

- 1.1 My full name is Adam William Charles Jellie. I am a Senior Planner in the consultancy firm of Beca. I have over 10 years' experience in planning.
- 1.2 I hold the qualification of a Bachelor of Planning from the University of Auckland 2011. I am a full member of the New Zealand Planning Institute.
- 1.3 My previous experience includes the following relevant projects:
 - (a) I have assisted with the development of Plan Change 21 to the Waikato District Plan: Franklin Section ("PC21") and the associated Assessment of Effects on the Environment ("AEE") and Section 32 Report on behalf of Pokeno Village Holdings Limited ("PVHL");
 - (b) I have prepared numerous resource consent applications on behalf of PVHL for their developments at Pokeno; and
 - (c) I have assisted the Auckland Unitary Plan Independent Hearings Panel with the preparation of their recommendation reports, and Auckland Council with the plan development of the Proposed Auckland Unitary Plan.

- 1.4 I have been engaged by PVHL to prepare and present this planning evidence to the Hearings Panel in relation to PVHL's submission and further submission points. PVHL is submitter number 368 and further submitter number 1281.
- 1.5 In preparing this evidence I have reviewed the s42A Report and Appendices and submissions relating to Hearing Topic 2.
- 1.6 This statement of evidence addresses:
 - (a) Amendments sought to the PWDP which reflect good planning practice and remove ambiguity; and
 - (b) The implementation of National Planning Standards ("Standards")
- 1.7 Attachment A to this statement of evidence contains two tables:
 - (a) A table setting out the section 42A Reporting Officer's recommendations in relation to the PVHL's submission and further submissions on PVHL's submission points (summarised from Appendix 1 of the section 42A Report); and
 - (b) A table setting out the section 42A Reporting Officer's recommendations in relation to the PVHL further submission (summarised from Appendix 1 of the section 42A Report).

2. **EXPERT WITNESS CODE OF CONDUCT**

- 2.1 I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Consolidated Practice Note (2014) and I agree to comply with it. I can confirm that the issues addressed in this statement are within my area of expertise and that in preparing my evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

3. **SUMMARY OF POKENO VILLAGE HOLDINGS LIMITED SUBMISSION**

- 3.1 The PVHL submission relates to:
 - (a) The approach to plan drafting that underpins the plan review;
 - (b) The adequacy of the section 32 analysis (s32 analysis) that underpins the plan review;
 - (c) The PWDP approach to integrating Plan Changes 24 and 21 to the Waikato District Plan: Franklin Section; and

(d) The zoning of the land located north west of Pokeno township on the western side of Helenslee and Munro Roads and described as “Pokeno West” in the section 32 reports accompanying the PWDP (“Pokeno West”).

3.2 The majority of the matters listed above will be addressed at future hearings and this brief of evidence only addresses matter (a).

4. **AMENDMENTS SOUGHT TO REFLECT GOOD PLAN DRAFTING PRACTICE**

4.1 In summary, PVHL in their original submission sought to amend the PWDP to:

(a) better reflect good plan drafting practice;

(b) remove ambiguities; and

(c) avoid disputes over interpretation.

4.2 I support these submissions, and I consider that district plans should be drafted with a clear structure, in which the cascade from objectives, policies and implementation methods is plainly evident. It is my view that this prevents any ambiguity as to which implementation methods give effect to which objectives and policies.

4.3 In response to submission point 386.1, and similar points raised by other submitters, the section 42A Reporting Officer has recommended¹:

A degree of appropriate cross-referencing occur now within the PWDP. Rather than attempt to exhaustively list every potentially relevant provision, I recommend that the obvious and most important linkages be clearly set out, and the PWDP be noted that other provisions may also apply. This will also aid in the restructuring of the plan when WDC implements the National Planning Standards.

4.4 I support the intent of the section 42A Reporting Officer’s recommendation, however in my view, inserting a cross reference does not completely address the concerns raised by PVHL in their submission on this point.

4.5 PVHL sought full cross referencing and that the objectives and policies be located with the implementation methods in the same section. I support this approach, and furthermore, I note that the Ministry for the Environment has

¹ Para 121, Section 42A Report: Hearing 2: Plan Structure and All of Plan

prescribed this structure in their first National Planning Standards. I discuss this further in Section 5 and in summary, I consider adopting the National Planning Standards will address PVHL's concerns regarding plan structure and the avoidance of ambiguity.

- 4.6 In response to submission point 386.2, which raised the matter of inconsistent references to 'conditions' and 'standards' related to permitted activities, the section 42A Reporting Officer has recommended² deleting all reference to 'conditions' and replacing any such references with the word 'standards'.
- 4.7 I agree with the Section 42 Reporting Officer's view that 'conditions' should not be associated with permitted activities and that the term could be confused with conditions included within a resource consent.
- 4.8 I agree with and support the section 42A Reporting Officer's recommendation to accept this submission.

5. **NATIONAL PLANNING STANDARDS**

- 5.1 A number of submitters³ have sought that the National Planning Standards ("Standards") be implemented through the current PWDP process. PVHL supports this relief, and submitted on this matter in their submission and further submission.
- 5.2 In response to these submission points, and similar points raised by other submitters, the section 42A Reporting Officer has recommended not to implement the Standards in full through the PWDP process, and instead focus on some "easy wins"⁴.
- 5.3 I understand a potential "easy win" to be the cross referencing recommended by the section 42A Reporting Officer⁵ which is discussed at Paragraph 4.3 above. Other recommended "easy wins" are not readily evident, as no proposed track changes have been supplied with the Section 42A report. In my view, there are likely to be significantly more opportunities for part implementation of the Standards through this review process.
- 5.4 Furthermore, I consider that it is possible to implement the Standards in full through the current PWDP process. From my involvement in the Auckland Unitary Plan process, I note that the Hearings Panel significantly restructured

² Para 121, Section 42A Report: Hearing 2: Plan Structure and All of Plan

³ 559.1 Heritage New Zealand, 644.1 Spark New Zealand Trading Ltd, 646.1 Vodafone New Zealand Ltd, 648.1 Chorus New Zealand Limited, 746.138 The Surveying Company

⁴ Para 35, Section 42A Report: Hearing 2: Plan Structure and All of Plan

⁵ Paragraph 121, Section 42A Report - Hearing 2

the Proposed Auckland Unitary Plan ("PAUP") in their recommendations to Auckland Council. This included grouping objectives and policies with the respective rules as these were split in the notified PAUP, similar to the PWDP.

- 5.5 I consider that the majority of the planning standards relate to plan structure, i.e. where provisions are to be located, naming and numbering conventions. I do agree with the section 42A author that amending the PWDP to implement the Standards in full, could lead to some confusion for the remainder of the hearing process⁶. However, I don't consider this insurmountable, as a table appended to the relevant section 42A report could identify where provisions have been relocated to.
- 5.6 Notwithstanding the above, if the section 42A Reporting Officers recommendation to not implement the Standards in full is to be accepted, I note that the WDC has two mechanisms to implement the Standards following this process, these are:
- (a) amend their "documents" pursuant to section 58I(3) of the RMA in which the changes become operative once publicly notified; or
 - (b) use a Schedule 1 process to notify a proposed plan (and not a variation or change (refer Attachment B)).
- 5.7 I understand that several local authorities in their submissions to the Ministry for the Environment on the Draft National Planning Standards, raised concerns around the implementation of the *14. Definition* Standard ("prescribed definitions"), and the extent of consequential changes required to their plans.⁷ In recognition of these concerns, the Ministry for the Environment extended the timeframe for the implementation of the *14. Definition* Standard to seven years (refer Attachment B) and acknowledged that some local authorities may use a Schedule 1 process to implement the prescribed definitions rather than just amending their plans.⁸
- 5.8 In my view, implementing the Standards, particularly the *14. Definitions* Standard, through a second Schedule 1 process will:
- (a) Result in significant costs to submitters, who have already invested time and resource into the current PWDP process;

⁶ Para 118, Section 42A Report: Hearing 2: Plan Structure and All of Plan

⁷ Page 23, 2M Implementation, Recommendations on Submissions Report for the first set of National Planning Standards, Ministry for the Environment, April 2019

⁸ Page 23, 2M Implementation, Recommendations on Submissions Report for the first set of National Planning Standards, Ministry for the Environment, April 2019

- (b) Require notification of a new proposed plan, i.e. not simply a variation or change to the PWDP; and
 - (c) Lead to some submitters using a second process as an opportunity to relitigate matters already canvassed in the PWDP process, through implementation of the prescribed definitions.
- 5.9 As discussed above, from my involvement in the Auckland Unitary Plan process, grouping objectives and policies with the respective rules through the hearings process is feasible and beneficial. In this regard, I consider that the opportunity exists to largely implement the Standards through this PWDP process.
- 5.10 With this in mind, I consider that there are two key aspects to implementing the Standards in full through the current PWDP process, these being to:
- (a) Implement the “plan structure” standards progressively by Hearing Topic; and
 - (b) Implement the prescribed definitions, commencing at the Definitions Hearing Topic, and then again when consequential changes to provisions are required at the relevant Hearing Topic.
- 5.11 As discussed at Paragraph 5.7, feedback to the Ministry for the Environment indicates that the implementation of the prescribed definitions will require the most significant changes to plans.
- 5.12 To assist the Panel with considering this approach, I have prepared a table at Attachment C which identifies all of the National Planning Standards definitions against those with a similar definition in the PWDP. I have assessed the level of consistency between the definitions and highlighted these with a traffic light system, of green to red in term of potential change required. In my view the majority of the definitions only require minor changes to make them consistent with the *14. Definition* Standard. Those that do require moderate change can be considered further through the Definitions Hearing.
- 5.13 It is my view that the most efficient and appropriate means to implement the Standards, particularly the prescribed definitions, would be through the current PWDP process.

Adam William Charles Jellie

23 September 2019

Attachment A – Recommendations of the s42A Report

Table 1 – Summary of the Recommendations of the s42A Report in relation to PVHL’s submission points (and further submissions on these submission points)

| Sub point | Summary (taken from s42A Report) | s42a Recommendation |
|------------------|--|----------------------------|
| 386.1 | Amend the Proposed Waikato District Plan to better reflect good plan drafting practice. AND Any further, other or consequential relief necessary | Accept in part |
| <i>FS1377.77</i> | <i>Havelock Village Limited support submission point 386.1</i> | Accept in part |
| 386.2 | Amend the PWDP to remove ambiguities and avoid disputes over interpretation. AND Any further, other or consequential relief necessary. | Accept |
| <i>FS1377.78</i> | <i>Havelock Village Limited support submission point 386.2</i> | Accept |
| 386.8 | Amend the Proposed District Plan's approach to achieving housing variety by: <ul style="list-style-type: none"> - Providing for the full range of housing choice; - Recognising the role of personal choice in housing provision; - Recognising other constraints to achieving higher densities such as physical constraints and the provision of infrastructure; and - Recognising that housing variety is unlikely to be achieved through a single residential zone and density targets. | Reject |
| <i>FS1377.81</i> | <i>Havelock Village Limited support submission point 386.8</i> | Reject |

Table 2 – Summary of the Recommendations of the s42A Report in relation to PVHL’s further submission points

| Sub point | Summary | s42a Recommendation to Further Submission |
|------------------|--------------------------|--|
| FS1281.32 | Support submission 598.1 | Reject |
| FS1281.35 | Support submission 603.1 | Reject |

Attachment B: References from 17. Implementation Standard [Emphasis Added]

....

District plans⁹

4. Territorial authorities not listed in direction 5, and unitary authorities with separate district plans, must comply with the following planning standards: 1. *Foundation*, 4. *District plan structure*, 6. *Introduction and general provisions*, 7. *District-wide matters*, 8. *Zone framework*, 9. *Designations*, 10. *Format*, 12. *District spatial layers*, 13. *Mapping*, 15. *Noise and vibration metrics*, through either a) or b) **whichever is sooner:**

- (a) **Amendments to the district plan made by five years** from when the planning standards come into effect.
- (b) Notification of a **proposed district plan (but not a proposed change or variation) for submissions under clause 5, Schedule 1 RMA** after the planning standards come into effect.

...

6. Territorial authorities, and unitary authorities with separate district plans, must comply with 14. Definitions Standard through either a), b) or c) **whichever is sooner:**

- (a) **Amendments to the district plan of a territorial authority in direction 4** above or of a unitary authority made by **seven years** from when the planning standards come into effect.
- (b) Amendments to the district plan of a territorial authority in direction 5 above made by nine years from when the planning standards come into effect.
- (c) **Notification of a proposed district plan (but not a proposed change or variation)** for submissions under clause 5, Schedule 1 RMA after the planning standards come into effect.

⁹ Page 69, Implementation Standard, National Planning Standards, April 2019

Attachment C – Comparison of National Planning Standard Definitions Against the Proposed Waikato District Plan

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|---|--------------------|---|-------------------------------------|
| abrasive blasting | means the cleaning, smoothing, roughening, cutting or removal of part of the surface of any article by the use, as an abrasive, of a jet of sand, metal, shot or grit or other material propelled by a blast of compressed air or steam or water or by a wheel. | | | No exact definition in PWDP |
| accessory building | means a detached building, the use of which is ancillary to the use of any building, buildings or activity that is or could be lawfully established on the same site, but does not include any minor residential unit. | Accessory building | Means a building, the use of which is incidental to the use of the principal land use or building on that site. A garage that is integrated into and forms part of a dwelling is not an accessory building. | Almost Consistent |
| allotment | has the same meaning as in section 218 of the RMA (as set out in the box below) | Allotment | Has the meaning in section 218 of the Resource Management Act 1991. | Consistent |
| amenity values | | | | No definition in PWDP |
| ancillary activity | | | | No definition in PWDP |
| aquifer | | | | No definition in PWDP |
| bed | has the same meaning as in section 2 of the RMA (as set out in the box below) | | Has the meaning in section 3 of the Resource Management Act 1991. | Consistent (apart from the mistake) |
| best practicable option | | | | No definition in PWDP |
| bore | | | | No definition in PWDP |
| boundary adjustment | | | | No definition in PWDP |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|--|-----------------|---|--------------|
| building | means a temporary or permanent movable or immovable physical construction that is: a. partially or fully roofed, and b. is fixed or located on or in land, but c. excludes any motorised vehicle or other mode of transport that could be moved under its own power. | Building | Has the meaning in the Building Act 2004, excluding: (a) a pergola, not roofed or enclosed, less than 3 metres in height; or a swimming pool, ornamental pool, deck; or (b) other structure not roofed or enclosed, less than 1.5 metre in height; or a fence, or a wall other than a retaining wall, less than 2 metres in height; or public or cultural art in a public place less than 3 metres in height; or (c) a retaining wall or retaining structure less than 1.5 metres in height, provided that where a fence or non-retaining wall is placed at the top of the retaining wall, the combined height is less than 2 metres; or (d) a tank with a total capacity of no more than 35,000 litres, provided that no part of the tank protrudes more than 1 metre above natural ground level; or (e) a structure that is permeable and less than 4 metres in height to protect crops for agricultural use. | Inconsistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|--|-----------------|---|-----------------------------|
| building coverage | means the percentage of the net site area covered by the building footprint. | | Means the proportion of the net site area which is covered by any building. It includes: (a) overhanging or cantilevered parts of buildings or structures; (b) covered decks. It excludes: (a) eaves of a building that projects less than 750mm horizontally from the exterior wall of the building; (b) fences, terraces, and retaining walls; (c) uncovered decks less than 1m above ground level; and (d) uncovered swimming pools. | Almost Consistent |
| building footprint | means, in relation to building coverage, the total area of buildings at ground floor level together with the area of any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground. | | | No exact definition in PWDP |
| cleanfill area | | | | No definition in PWDP |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|--|---------------------|---|-----------------------|
| cleanfill material | <p>means virgin excavated natural materials including clay, gravel, sand, soil and rock that are free of:</p> <ul style="list-style-type: none"> a. combustible, putrescible, degradable or leachable components; b. hazardous substances and materials; c. products and materials derived from hazardous waste treatment, stabilisation or disposal practices; d. medical and veterinary wastes, asbestos, and radioactive substances; e. contaminated soil and other contaminated materials; and f. liquid wastes. | Cleanfill | <p>Means inert material such as concrete, brick or demolition products (excluding asphalt) and other inorganic materials which may be mixed with materials of natural origin, such as clay, soil, sand, aggregate (rock). When buried will have no adverse effect on people or the environment, and is free of:</p> <ul style="list-style-type: none"> (a) combustible, decaying, putrescible, degradable or leachable components; (b) contamination from hazardous substances; (c) materials likely to create leachate by biological or chemical breakdown; (d) products or materials derived from the treatment, disposal or stabilisation of hazardous waste; (e) materials that may present a risk to human or animal health such as medical and veterinary materials; and/or (f) liquid waste. | Almost Consistent |
| coastal water | | | | No definition in PWDP |
| commercial activity | <p>means any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices).</p> | Commercial Activity | <p>Means activities involving the sale or distribution of goods and services.</p> | Almost Consistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|-----------------------------------|---|------------------------|--|-----------------------------|
| community corrections activity | | | | No exact definition in PWDP |
| community facility | means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility. | Community activity | Means the construction and use of public land and buildings which provides for individual or community health, welfare, care, safety, recreation, cultural, ceremonial, spiritual, art and craft purposes and includes cemeteries. | Almost Consistent |
| contaminant | | | | No definition in PWDP |
| contaminated land | has the same meaning as in section 2 of the RMA (as set out in the box below) | Contaminated Land | Has the same meaning as that in the Resource Management Act 1991. | Consistent |
| cultivation | | | | No definition in PWDP |
| discharge | | | | No definition in PWDP |
| drain | | | | No definition in PWDP |
| drinking water | | | | No definition in PWDP |
| dry abrasive blasting | | | | No definition in PWDP |
| dust | | | | No definition in PWDP |
| earthworks | means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and | Earthworks | Means modification of land surfaces by blading, contouring, ripping, moving, removing, placing or replacing soil or earth, or by excavation, or by cutting or filling operations. | Almost Consistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|---|-----------------|---|-----------------------|
| | disturbance of land for the installation of fence posts. | | | |
| educational facility | means land or buildings used for teaching or training by child care services, schools, and tertiary education services, including any ancillary activities. | | Means premises where groups of people are given tuition and training on a formal basis and includes childcare facilities, schools, tertiary education institutions and specialised training facilities, and their ancillary administrative, cultural and health facilities. | Almost Consistent |
| effect | | | | No definition in PWDP |
| environment | | | | No definition in PWDP |
| esplanade reserve | | | | No definition in PWDP |
| esplanade strip | | | | No definition in PWDP |
| fertiliser | | | | No definition in PWDP |
| fresh water | | | | No definition in PWDP |
| functional need | means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment. | Functional Need | Means for Chapter 14 Infrastructure and Energy, the need for a proposal or activity to traverse, locate or operate in a particular environment because it can only occur in that environment. | Consistent |
| green infrastructure | | | | No definition in PWDP |
| greywater | | | | No definition in PWDP |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|---|---|------------------------|---|-----------------------------|
| gross floor area | means the sum of the total area of all floors of a building or buildings (including any void area in each of those floors, such as service shafts, liftwells or stairwells), i. where there are exterior walls, measured from the exterior faces of those exterior walls ii. where there are walls separating two buildings, measured from the centre lines of the walls separating the two buildings iii. where a wall or walls are lacking (for example, a mezzanine floor) and the edge of the floor is discernible, measured from the edge of the floor. | Gross Floor Area | Means the sum of the gross area of all floors of a building, measured either from the exterior faces of the exterior walls, or from the centre line of walls separating two tenancies, as circumstances may require | Almost Consistent |
| ground level (for the purposes of district plans and the district plan component of combined plans) | | | | No exact definition in PWDP |
| groundwater | | | | No definition in PWDP |
| habitable room | | | | No definition in PWDP |
| hazardous substance | has the same meaning as in section 2 of the RMA (as set out in the box below) | Hazardous Substance | Means any substance with hazardous properties, including radioactivity, high BOD (Biological Oxygen Demand) and those properties defined as hazardous for the purpose of the Hazardous Substances and New Organisms Act 1996. | Inconsistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|--------------------------------|--|----------------------|---|-------------------|
| height | means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point. | Height | Means, in relation to a structure, the vertical distance between any part of the structure and natural ground level immediately below that part of the structure. In determining the height of any building, no account shall be taken of chimneys (not exceeding 1 metre in width) or finials, provided these do not exceed the maximum height for the zone by more than 2 metres. | Inconsistent |
| height in relation to boundary | means the height of a structure, building or feature, relative to its distance from either the boundary boundary of a: a. site, or b. other specified reference point. | Height control plane | Means a surface through which no part of a building other than chimneys, flues and similar projections not exceeding 2 metres in height and 1 square metre in area may protrude. It is defined by drawing height control lines from all points on the boundaries of an allotment or unit site area. Such lines commence at a specified vertical distance above the natural ground level at the boundary, point into the site at right angles to the boundary, and rise at an angle of 37 degrees. | Inconsistent |
| historic heritage | has the same meaning as in section 2 of the RMA (as set out in the box below) | Historic Heritage | Has the meaning in s2 of the Resource Management Act 1991. | Consistent |
| home business | means a commercial activity that is: a. undertaken or operated by at least one resident of the site; and b. is incidental to the use of the site for a residential activity. | Home occupation | Means an occupation, or trade/craft, or profession, excluding panel beating or car wrecking, where the principal use of the site is for residential activities and the principal operator of the home occupation is a permanent resident on-site. | Almost consistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|-------------------------------------|---|---------------------|---|-----------------------------|
| industrial activity | means an activity that manufactures, fabricates, processes, packages, distributes, repairs, stores, or disposes of materials (including raw, processed, or partly processed materials) or goods. It includes any ancillary activity to the industrial activity. | Industrial Activity | Means the production, processing, bulk moving or storage in bulk of any materials, goods or products: Production includes: (a) manufacturing; and (b) assembly from components. Processing includes: (a) repair; (b) servicing; (c) maintenance; and (d) assembly of materials, goods or product. Bulk storage includes: (a) warehousing. | Almost consistent |
| industrial and trade waste | | | | No definition in PWDP |
| intensive indoor primary production | | | | No exact definition in PWDP |
| LA90 | | | | No definition in PWDP |
| LAeq | | | | No definition in PWDP |
| LAF(max) | | | | No definition in PWDP |
| lake | | | | No definition in PWDP |
| land | | | | No definition in PWDP |
| land disturbance | | | | No definition in PWDP |
| landfill | | | | No definition in PWDP |
| Ldn | | | | No definition in PWDP |
| Lpeak | | | | No definition in PWDP |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|-----------------------------------|--|--------------------------|--|-----------------------------|
| minor residential unit | means a self-contained residential unit that is ancillary to the principal residential unit, and is held in common ownership with the principal residential unit on the same site. | Minor dwelling | Means a second dwelling independent of the principal dwelling(s) on the same site | Almost consistent |
| natural and physical resources | | | | No definition in PWDP |
| natural hazard | | | | No definition in PWDP |
| net floor area | | | | No exact definition in PWDP |
| net site area | means the total area of the site, but excludes: a. any part of the site that provides legal access to another site; b. any part of a rear site that provides legal access to that site; c. any part of the site used for access to the site; d. any part of the site subject to a designation that may be taken or acquired under the Public Works Act 1981. | Net site area | Means the area of a site, or the area of an allotment in the context of a subdivision, excluding: (a) any access or access leg less than 6 metres wide; and (b) any land subject to a right of way to any other allotment. | Inconsistent |
| network utility operator | has the same meaning as in s166 of the RMA (as set out in the box below) | Network utility operator | Has the same meaning as in s166 of the Resource Management Act 1991. | Consistent |
| noise | | | | No definition in PWDP |
| noise rating level | | | | No definition in PWDP |
| notional boundary | means a line 20 metres from any side of a residential unit or other building used for a noise sensitive activity, or the legal boundary where this is closer to such a building. | Notional boundary | Means a line measured 20 metres, and parallel to any side of a residential unit or a building occupied by a sensitive land use, or the site boundary | Consistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|--|-----------------|--|-----------------------|
| | | | where this is closer to the residential unit or sensitive land use. | |
| official sign | | | | No definition in PWDP |
| operational need | means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints. | | Means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical or operational characteristics or constraints. | Consistent |
| outdoor living space | means an area of open space for the use of the occupants of the residential unit or units to which the space is allocated. | Living court | Means an area of outdoor space directly related to the living area of a household unit, and for the household's exclusive use. It does not include parking, manoeuvring areas and buildings, but does include swimming pools, pergolas and similar open-framed structures. | Inconsistent |
| peak particle velocity | | | | No definition in PWDP |
| primary production | | | | No definition in PWDP |
| quarry | | | | No definition in PWDP |
| quarrying activities | | | | No definition in PWDP |
| raft | | | | No definition in PWDP |
| reclamation | | | | No definition in PWDP |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|-----------------------------------|--|------------------------|--|--------------------|
| residential activity | means the use of land and building(s) for people's living accommodation. | Residential activity | Means the use of land and buildings by people for living accommodation in a household unit, where the occupants will generally refer to the site as their home and permanent address. For the purpose of this definition, includes emergency and refuge accommodation, or accommodation for supervision staff and residents, where residents are subject to care or supervision (e.g. homes for people with disabilities). Residential activity includes home detention (as defined in the Criminal Justice Act 1985), but not prisons or other places where residents are subject to detention. | Inconsistent |
| residential unit | means a building(s) or part of a building that is used for a residential activity exclusively by one household, and must include sleeping, cooking, bathing and toilet facilities. | Residential unit | Means a building or group of buildings, or part of a building or group of buildings that is: (a) used, or intended to be used, only or mainly for residential activities; (b) occupied, or intended to be occupied, exclusively as the home or residence of not more than one household. | Almost consistent |
| retirement village | means a managed comprehensive residential complex or facilities used to provide residential accommodation for people who are retired and any spouses or partners of such people. It may also include any of the following for residents within the complex: recreation, leisure, supported residential care, welfare and medical facilities (inclusive of hospital care) and other non-residential activities. | Rest home | Means buildings, services and facilities that provide residential-based health care with on-site support to residents requiring nursing care or significant support with the activities of daily living. This may include respite care and rest home-based hospital specialist geriatric care, but excludes people who require nursing or hospice support in a dwelling. | Almost consistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|----------------------------|--|-----------------|--|-----------------------|
| river | | | | No definition in PWDP |
| road | | | | No definition in PWDP |
| rural industry | means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production. | | Means an industry that involves the direct handling or processing to the first stage of manufacture of any raw produce harvested from farming, rural contractors' depots, or any other land-related agricultural activity, but excludes waste disposal, extractive industries and electricity generation | Inconsistent |
| sewage | | | | No definition in PWDP |
| sign | means any device, character, graphic or electronic display, whether temporary or permanent; which a. is for the purposes of— i. identification of or provision of information about any activity, property or structure or an aspect of public safety; ii. providing directions; or iii. promoting goods, services or events; and b. is projected onto, or fixed or attached to, any, structure or natural object; and c. includes the frame, supporting device and any ancillary equipment whose function is to support the message or notice. | Sign | Means any device, graphic or display of whatever nature that is visible from a public place, for the purposes of: (a) providing information to the general public; (b) identifying and providing information about any activity, site or building; (c) providing directions; or (d) promoting goods, services or forthcoming events. | Almost consistent |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|--|--|-----------------|--|-----------------------------|
| site (for district plans and the district plan component of combined plans) | means: a. an area of land comprised in a single record of title as per Land Transfer Act 2017; or component of combined plans) b. an area of land which comprises two or more adjoining legally defined allotments in such a way that the allotments cannot be dealt with separately without the prior consent of the council; or c. the land comprised in a single allotment or balance area on an approved survey plan of subdivision for which a separate record of title as per Land Transfer Act 2017 could be issued without further consent of the Council; or d. except that in relation to each of sub clauses (a) to (c), in the case of land subdivided under the Unit Title Act 1972 or 2010 or a cross lease system, a site is the whole of the land subject to the unit development or cross lease. | Site | Means: (a) any area of land comprised in one Record of Title, or two or more Records of Title linked pursuant to s37 of the Building Act 1991, or s75 of the Building Act 2004, or s220 of the Resource Management Act 1991; (b) in the case of land developed under the Unit Titles Act 2010, the area comprised in a principal unit or accessory unit excluding any common property; (c) in the case of cross-leases, the area for exclusive use comprised within the cross-lease, excluding any common property. | Almost consistent |
| special audible characteristic | | | | No definition in PWDP |
| stormwater | | | | No definition in PWDP |
| structure | | | | No exact definition in PWDP |
| subdivision | has the same meaning as “subdivision of land” in section 218 of the RMA (as set out in the box below) | | Has the meaning in section 218 of the Resource Management Act 1991. | Consistent |
| sustainable management | | | | No definition in PWDP |

| National Planning Standard | Definition | PWDP Definition | Definition | Consistent? |
|--------------------------------------|---|------------------------|---|-----------------------|
| temporary military training activity | | | | No definition in PWDP |
| territorial authority | | | | No definition in PWDP |
| visitor accommodation | | | | No definition in PWDP |
| wastewater | | | | No definition in PWDP |
| water | | | | No definition in PWDP |
| waterbody | | | | No definition in PWDP |
| wet abrasive blasting | | | | No definition in PWDP |
| wetland | has the same meaning as in section 2 of the RMA (as set out in the box below) | | Has the meaning in the Resource Management Act 1991 | Consistent |