



CLUTHA DISTRICT COUNCIL

Address all correspondence to:
The Chief Executive

Our Reference
196321

7 August 2018

Ministry for the Environment
Via email

Dear Sir/Madam

Submission to Draft National Planning Standards Consultation Document

1. In general, the Clutha District Council (CDC) is in support of the initiative to move to an electronic plan format with some consistency around plan contents.
2. The CDC's district plan is part way through a rolling review, largely to manage the workload and financial constraints. In addition, there has not been the pressure from growth and development to implement a full review and the rolling review has enabled us to be more flexible to respond to pressure points. Our proposed approach to implement the first set of planning standards is to use a mix of internal and external resources. This would be attempted within the timeframes set out, however may not be achieved if consultant availability is limited.
3. CDC supports the proposed structure of a district plan, which largely reflects our current plan structure.
4. The Draft Electronic Accessibility and Functionality Standard requires (under Table 18, number 7) that a note and hyperlink are contained within a district plan rule to a relevant regional plan rule. The CDC considers that this is onerous and also creates an expectation that all rules are identified, which may not be the case. Furthermore, it will also require a huge undertaking of work to go through all district and regional plans to carry out this cross referencing exercise. If provisions then change later, there is no guarantee that they will be updated through the notes or hyperlinks in other documents.
5. The CDC District Plan does not have a commercial zone, rather it uses a Service Retail Frontage along the edge of the Urban Resource Area to indicate more relaxed rules for non-residential activities. The proposed commercial zones in the DNPS will require a significant change from this approach, however there appears to be a Mixed-use and/or Town Centre zone that can provide some options for us.

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6. The Draft Mapping Standard has merits, however we wonder how other zones or layers are to be represented. For example:
 - The CDC district plan includes a Transitional Zone that defaults to rural unless it is serviced.
 - The plan identifies rivers where esplanade strips/reserves currently exist as well as where public access is required. In terms of the mapping symbology description, there needs to be identifier fields for the point location features, such as heritage items, so that the item can be found in the plan, or at least provide for a description of what it is.
 - The flood hazard layer in the CDC district plan contains further refinement based on the type of flood risk, with associated rules for each risk area. Only having one hazard layer will limit our ability to do this, unless other layers can be superimposed over it.
7. The Draft Spatial Planning Tools provide a good range of tools to use, however there is no corresponding mapping standard for these. It would be useful if national consistency is applied to these if that is the overall desired outcome of the NPS.
8. Further guidance will be needed on how to implement the mandatory provisions compared to provisions that are subject to the Schedule 1 process. Is it anticipated that there could be a 'test' plan prior to the changes being made? Guidance will also be needed for councillors and commissioners making decisions on submissions as well as submitters so that they understand what can and can't be changed.
9. CDC, as a small, rural council, has limited resources and the cost per ratepayer to implement is disproportionate to the benefits of the NPS. The economic analysis carried out for the DNPS showed that rural councils would be facing a \$34 per capita cost, compared to \$12 for provincial and \$5 for metro councils. CDC seeks support to implement these changes as it is an unfair burden on an already stretched ratepayer base. Support could be in the form of financial or expertise.

We welcome further discussion on any of the above matters.

Yours faithfully



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