To Whom it may concern,

RE: SUBMISSION ON PLANNING STANDARDS

Thank you for providing us with an opportunity to comment on the draft national planning standards.

We notified our decisions version of our District Plan on the 1 May 2018 and therefore meet the criteria for an extended seven-year implementation timeframe. As such we would be grateful if you could confirm that the seven-year timeframe will apply to us.

We do not intend to respond to all the questions just the ones we feel are most relevant to our District and are most likely to affect our residents.

By way of background Opotiki District Council on average processes less than 40 resource consent applications per annum and much of our District is in rural area with limited, albeit improving, internet connectivity. The number of homes within the District that have a computer or internet connectivity is significantly below the national average.

Q10: Is ‘Level 5’ of the Electronic Accessibility and Functionality Scale an appropriate standard for council ePlans? Should it be more or less ambitious? What would you include/exclude?

The cost, although unknown at this stage, to the Council of obtaining ‘Level 5’ of the Electronic Accessibility and Functionality Scale is going to place a heavy burden on our ratepayers. It is to be noted here that Council spending of $100,000 is the equivalent of a 1% rate increase or a significant increase in the individual costs of resource consents (equates to $2222 per resource consent). For that reasons, we suggest that a less ambitious objective for a Council our size processing a small number of applications would be appropriate.

The aim of the standards is to improve the customer experience making it easier for them to interact and understand plans. We feel that the service we currently provide achieves this aim with customers having direct access to a planner. During the last financial year we received 445 email and phone enquiries and we were able to respond to the majority of them within 1-2 working days and all of them within our 5 working day target. Given our small size we relate and interact with our customers on more personal level than perhaps some of the larger Councils are able to. So whilst ‘Level 5’ may have obvious benefits to a larger Council with greater numbers of residents, we do not feel that we would receive the same level of benefits. Any benefits we experienced would certainly not outweigh the costs to our ratepayers.
We are currently operating at ‘Level 1’ and are moving towards achieving ‘Level 2’ as we feel this is an appropriate level for the way we operate and how our community interacts with us. We suggest that flexibility is incorporated within the planning standards to recognise the uniqueness and difference of each community.

**Q11: For Councils: what type of support would be useful to help you implement the ePlan standard?**

A significant amount of IT support both in terms of implementation and ongoing maintenance of the system. In order to achieve this we would require both a significant upfront and ongoing financial commitment.

If I can be of any further assistance then please do not hesitate to contact me.

Kind regards,

Gerard McCormack  
**PLANNING AND REGULATORY GROUP MANAGER**