

FROM THE
OFFICE OF THE MAYOR



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Hon David Parker
Minister for the Environment
Planning standards
c/- Ministry for the Environment
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By email: planningstandards@mfe.govt.nz

Dear David

Submission – Draft National Planning Standards

Thank you for the opportunity to submit on the draft national planning standards. Council appreciates that these changes represent a shift to an alignment of structure form and e-delivery of RMA plans which has been envisioned for a number of years.

Electronic Accessibility and ePlan Requirement

Council can see the benefits of the electronic accessibility and functionality standard. As technology advances, systems will become available that can save our community time and effort; Council appreciates that there is an expectation from the public that local government ought to keep up with such advancements. However, Council is also aware that new systems come with a cost for implementation.

Rangitikei District Council currently uses, and has invested considerably, in Intramaps for GIS web applications. Intramaps is fully configurable which makes it an appropriate tool for creation and implementation of an ePlan in the future, which Council is supportive of. This system would allow Council to link from the mapping system directly to PDF documents of the relevant sections of the plan. At present the standards are not clear about whether linking an HTML display of the District Plan is required or if a PDF would suffice. This is of concern to Council as substantial changes that would require significant resourcing would be needed to upgrade the website and enable an HTML display. Rangitikei District Council is a small organisation with limited funding and resources, and are therefore wary about the significant costs involved with creating an ePlan that is fully integrated with a HTML system. The cost to fully integrate the e-plan to an interactive HTML and embedded GIS system has been estimated at approximately \$75,000. The cost to provide an interactive GIS viewer with the ability to drill through layers that are hyperlinked to the District Plan in PDF format has been estimated significantly lower at approximately \$10,000. Council is of the view that, as our current system can achieve a comparable output of information, a requirement for HTML display of data would be unnecessary and cost prohibitive.

With reference to the requirement for previous district plans to be made available online, Council has concerns this could also have implications for us in terms of resourcing. Our first generation District Plan went through over 20 plan changes during the time it was operative. Very few of these documents are currently in an electronic format. It is recommended that this standard is amended so that only versions of the operative plan are available electronically.

Making this place home.

Spatial planning tools

Council can understand the reasoning behind the standardisation of colours for zoning on maps. Council acknowledges that having different visual representations for different layers and features between different local authorities could be confusing for some plan users. In light of the fact that standardisation of zone colours is attempting to alleviate confusion and simplify things, we request that more attention be given to ensuring the colours for each are easily distinguishable, particularly where there are similar zones (for example the colours for low-density residential and medium-density residential will be hard to distinguish in practice). We also ask that that consideration be given to the colour vision impaired and the effect of multi overlays of colour which when overlaid can cause distortions.

Content and metric standards

Council appreciates that standardisation of definitions could reduce the time spent debating the details of certain definitions. However, some of the new definitions set for implementation will require our rules to be altered to retain the existing meaning. While there is provision for consequential amendments not requiring a Schedule 1 process, given some of the changes which will be required to the rules, Council would be likely to amend the definitions alongside a district plan review/change process. The proposed timeframe for the initial roll out of definitions will allow this to occur. We request that, if the Ministry adds to the mandatory definitions, this occurs within the next five years, or an implementation timeframe is provided to allow for the incorporation of the definitions in the next district plan review process. We also request that the Ministry will provide comprehensive guidance for organisations about what constitutes as a consequential amendment, and hopes that the Ministry will be well equipped to adequately respond to queries from Councils for plan specific matters.

Structure standards

Council accepts that making plans easier to follow for the layperson is desirable, but whether uniformity across statement structure and formatting will achieve that is not yet proven. In any case, we do not see how it would be of advantage to those who work with a single district plan. The operative Rangitikei District Plan is currently simple and easy to use, and we are concerned the tables set to be introduced may complicate the way our plan reads. We also sense that the Ministry may be underestimating the amount of work involved for councils with this 'cutting and pasting exercise', to implement this structure standard, particular for smaller authorities such as our own. We therefore hope that there will be sufficient guidance from the Ministry to assist with implementation – including plan specific examples and a point of contact at the Ministry to answer questions.

In summary, Council requests the following:

- The Ministry does not implement a mandatory national ePlan mode of delivery.
- The Government underwrites costs of implementing hyperlinked electronics standards
- The timeframe for including hyperlinks to regional plans within existing district plans is increased from 12 months to 5 years.
- Due to the significant cost difference of implementing the e-plan in PDF versus HTML, that the Ministry *does not* require HTML data delivery as part of the e-plan requirements.
Should HTML data delivery be made mandatory as part of the standards, appropriate funding be allocated to local authorities to cover the significant cost of implementation
- The requirement for providing PDFs of all past plans is amended so that only versions of the operative plan are required to be available electronically.
- More attention be given to ensuring the colours for each are easily distinguishable.
- Consideration be given to the colour vision impaired and the effect of multi overlays of colour which when overlaid can cause distortions.
- If the Ministry adds to the mandatory definitions this occurs within the next five years, or provides an implementation timeframe to allow for the incorporation in the next district plan review process.

- The Ministry will provide comprehensive guidance for organisation about what constitutes as a consequential amendment regarding the implementation of standardised definitions, and provides resourcing to respond to queries from councils.
- The Ministry provides guidance to assist with implementation of the structure standards – including plan specific examples and a point of contact at the Ministry to answer questions.

I hope these comments are useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Watson', with a stylized, cursive script.

Andy Watson

Mayor of Rangitikei