ISOVIST

DRAFT FIRST SET OF NATIONAL PLANNING STANDARDS:

ISOVIST LTD SUBMISSION

JON RICHARDS

AUGUST 17, 2018

Dear Sir/Madam

Thank you for the opportunity to submit on the Draft First Set of National Planning Standards. Isovist Ltd have engaged in this process as we are the leading e-plan provider in NZ.

The following submission form sets out Isovist Ltd.'s comments on the Draft First Set of National Planning Standards. We have considered the Standards from the perspective of delivering e-plans. Consequently, our submission is based on an examination of the practicalities of implementing the Standards from an e-plan delivery perspective. We have therefore only provided responses to those matters that could relate to e-plan provision/implementation and we have not provided comments on other matters.

Please note that, on this e-planning matter, we will be available to provide further technical input and advice as needed to assist MfE.

Yours Faithfully

Jon Richards
Director

Draft first set of National Planning Standards

SUBMISSION FORM

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Submitter type*	Individual	☐	
	NGO	☐	
	Business / Industry	☒	
	Local government	☐	
	Central government	☐	
	Iwi	☐	
	Other (please specify)	☐	Click here to enter text.

Draft first set of National Planning Standards

1. **Do you support the draft first set of National Planning Standards?**

☒ Yes

☐ No

Isovist generally support the Draft first set of National Planning Standards.

Increased consistency across plans together with the use of e-planning will assist in making the RMA process easier to navigate and more cost effective.

We have reviewed the content of the Standards as notified and have tested the application of these in an e-plan format. To do that we have taken the plan structure and content (including the definitions) and generated a template e-plan for each for each four types of plan set out in the draft Standards. (Through using these online templates, councils will be able to deliver their plans in line with the standards simply, consistently and cost effectively. Please contact Isovist Ltd - www.isovist.co.nz - for access to these e-plan templates).

These e-plan templates are designed to be easily and quickly updated to reflect any further changes to the Standards through to gazettal and for any future alterations that may be required. Consequently, we will be able to test and provide further feedback on future changes to assist MfE.

Whilst Isovist support the introduction of the National Planning Standards we have a few comments based on our review of the draft and from our testing.

2. **S-RPS: Regional policy statement structure standard**

The term "Historic Heritage" is used throughout document but in the "Mapping" Section these are referred to as "Heritage Items". This should be amended to the term "Historic Heritage" for consistency.

S-RPS, S-RP - Part 4 - Themes, Land and Water - The requirement says local authorities must consider whether to combine these chapters but no abbreviation has been given for a combined chapter. Isovist suggest that an abbreviation is created. Isovist suggest "LDW".

3. **S-RP: Regional plan structure standard**

S-RPS, S-RP - Part 4 - Themes, Land and Water - The requirement says local authorities must consider whether to combine these chapters but no abbreviation has been given for a combined chapter. Isovist suggest that an abbreviation is created. Isovist suggest "LDW".
Part 5 - Catchments, Insert name of catchment or freshwater management unit - No abbreviations given. Create abbreviations. Isovist suggest CATCH1 - and FMU1 -

4. **S-DP: District plan structure standard**

S-DP, Table 5 - Heritage sites and areas is referred to as 'Historic heritage' in all other plan types and in section F-6 as the district plan section name. Rename to Historic Heritage. Ensure wording is consistent in both S-DP and F-6

5. **S-CP: Combined plan structure standard**

Part 3 - Regional Policy Statement, Themes and Part 4 - Region Wide Matters   - The requirement says local authorities must consider whether to combine these chapters but no abbreviation has been given for a combined chapter. Create an abbreviation. Isovist suggest PSLDW for Part 3 and LDW for Part 4

Part 3 - Regional Policy Statement, Significant resource management issues for the region, Significant resource management issue and discussion - No abbreviation has been provided for this section". Provide an abbreviation

6. **S-IGP: Introduction and general provisions standard – Part 1 of all plans and policy statements**

   a. **Introduction chapter**

S-INTRO 4 a:

The seal can be provided as part of an e-plan and shown online with the rest of the plan content. Online PDF versions of plans often already do this however; we note that in practice the seal has not always been provided by councils in their online plans.

The role of the seal and its requirement are set out under sections 17(3) and 18(2) of the RMA, however this requirement doesn't reflect the increased functionality provided by online tools. E-plans have the ability to track plan progress and revisions over time. This functionality enables users to select current or earlier versions of the plan, and easily identify the legal status of version they are viewing. Legal status can be shown for the plan version as a whole, specific sections or lines of plan text and plan changes as they progress. The relevant details on operative dates, when the plan was adopted by council etc. are easily and clearly provided as part of the e-plan viewer and links can be provided to committee reports, court decisions etc., can be included for greater transparency if needed. This functionality ensures that the correct version, the legal status and background information on the decision process can all be available on screen and in detail.

   f. **National direction**

S-IGP, S-NDI, Table 13 This section identifies the use tables within tables. This approach is workable but in terms of usability and onscreen clarity this is not always ideal on an online viewer, particularly on smaller, mobile devices. Consider laying out this section by avoiding tables within tables.

7. **S-TW: Tangata whenua structure standard – Part 2 of all plans and policy statements**

8. **S-SD: Strategic direction structure standard – Part 3 of District plans**

9. **S-DWM: District wide matters standard – Part 4 of District plans**

   Natural Environment Values Chapter:

   S-DWM, S-NEV, Instruction 6 a "identification of the coastal environment, either by mapping or narrative" Where features are spatial with rules that relate to that feature e.g. coastal environment these should be mapped rather than provided solely by narrative. Amend as follows: "identification of the coastal environment, spatially with narrative if required".

10. **S-ASM: Draft area specific matters standard – Part 5 of District plans, Part 6 – Combined plans**

11. **S-SAM: Schedules, appendices and maps standard – Part 6 – Regional policy statements, Part 7 – Regional plans, Part 6 – District plans, Part 8 – Combined plans**

12. **F-1: Electronic accessibility and functionality standard**

    F-1, Table 19, Instruction 2:

    The Standards indicate that the implementation of e-plans is tied to the delivery of the required plan layout, definitions and other matters around creating consistent plan formats. However, many of the councils are already providing plans on a level 5 e-plan platform as this offers significant benefits which can be reaped regardless of the introduction of the Standards

    The Section 32 analysis for the Standards identifies major benefits in terms of improved ease of access to key information for users (especially for public users seeking to make simple enquiries around whether they need to apply for resource consent) and overall cost savings. In particular, it is noted that the s.32 and the accompanying cost benefit analysis considers that the Electronic Functionality Standard has the greatest overall benefit at 1.74. These savings can be made now with operative plans.

    The draft sets out a list of Councils that are proposed to have an extended time frame post Gazettal of 7 years. Whilst we recognise that these councils' plans are recent and there is practical and financially realistic element to them having additional time before redrafting and relitigating their plan content, we maintain that this should not be a reason for delaying putting their current plans online until 2026. That is a considerable delay in delivering the benefits of e-plans.

    Furthermore, delivery of e-planning matches overall govt direction on the delivery of greater service delivery through the use of technology now without the need to wait artificially until the plans are reviewed. This approach appears to run contrary to the DIA ICT Strategy "Easier Access to Access Digital Services" which seeks delivery of easier access to digital services for individuals, and ensuring technology-enabled services for business.

    Isovist therefore contend that e-delivery should not be wholly tied to the timeframes for the introduction of the Standards plan format and definitions as the benefits extoled around public access, usability and cost saving can be achieved now rather than waiting until that point.

    Moreover, the timeframes as set out and the requirements attached to each can reduce the potential for innovation. Considering the pace that technology moves onwards, the lengthy 5 or 7 year periods identified are likely to be quickly out of step with technological advances. For example, our company products now meet the requirements of Level 6 on the MfE scale and are already heading into level 7 to meet councils' needs and their desire to provide better customer service.

There is also a practical matter that needs to be considered in the stepped approach. Firstly, councils may waste money on buying software to meet minimum needs now and then will have to purchase further software later to meet the higher specification required. Secondly, with those purchasing software for their plan reviews, they need to consider the lead in times. We strongly recommend that councils obtain the software ready for drafting their plan reviews.

13. **F-2: Mapping standard**

   a. **Zone colour palette**

Planning maps contain a significant amount of GIS layers and symbology, making it incredibly difficult to find colour schemes that work for all features. Therefore, we would suggest subduing (as they were in previous drafts) the zone colour palette table for the following reasons:

- Additional boundary symbology would be difficult to see, example Heritage Area around City Centre would be almost indistinguishable.

- Symbols such as heritage items, trees etc would again be difficult to see on the darker zone colours.

   b. **Symbology**

F-2, Table 22 It is noted that some of the earlier drafts of symbology proposals have been dropped. Many of them related to spatial representations of features that are referenced in the plan rules such as state highways. Utilising WorkSafe NZ has also been dropped, the standardisation objective of the Standards is not assisted by allowing all Councils to represent utilities such as water and gas in a variety of ways. Consider providing symbology for such State Highways and the Work Safe utilities

14. **F-3: Spatial planning tools (Regional) standard**

15. **F-4: Spatial planning tools (District) standard**

16. **F-5: Chapter Form standard**

F-5, Part D, Instruction 3 - Instruction states Part 2 Tangata Whenua in plans must use the headings in order – including objectives, policies, rules if relevant etc. but no direction given in S-TW. Provide instructions in S-TW for local authorities to give consideration to whether objectives, policies, rules are required for Part 2 – Tangata Whenua, or remove from F-5, Part D, Instruction 3 if not

F-5, Table 26 We have put this Table format into our e-plan templates created using the draft standards. Please note that the number of columns indicated in the Standards is workable on an e-plan platform but we would advise against the use of more than three columns where substantive text is involved. Multi column text based tables can result in increased need for online scrolling and therefore reduced ease of use.

17. **F-6: Status of rules and other text and numbering form standard**

   Numbering:

F-6, Table 28, District Plan Sections, HH - Historic Heritage Called 'Heritage sites and areas' in the S-DP Table 5. Retain this wording if amending in S-DP Table 5. Ensure wording is consistent in both S-DP and F-6

18. **CM-1: Definitions standard**

19. **CM-2: Draft noise and vibration metrics standard**

20. **Implementation**

    a. **ePlanning implementation**

It is noted from previous discussions on e-plan requirements, that some smaller councils have been concerned over the need to fund and resource GIS expertise. It is noted that some may not have the in-house GIS resources and expertise required to deliver and update plan mapping, and this requirement would involve additional cost. We also note that councils in similar positions have already managed this approach with minimal cost by working with neighbouring councils through shared service arrangements to deliver this in a cost-effective manner.

Additionally, we also note that through the development of the standards, consideration has been given to centrally hosting some elements for those unable to deliver and maintain e-plans.

    b. **Timing**

Please see our comments on the F1 Electronic accessibility and functionality standard above. Isovist content that e-delivery should not be tied to the introduction of the Standards plan format as the benefits extoled around public access, usability and cost saving can be achieved now rather than waiting until that point.

As stated above under F1 as a practical matter, those purchasing software for their plan reviews, need to consider the lead in times. We strongly recommend that councils obtain the software at the point no later than they are ready to start drafting their plan reviews.

21. **Future content for standards**

Other comments

22. **Do you have any further comments you wish to make about the Government's proposal?**

Further suggested minor amendments:

In reviewing the notified documents and through our testing of the standards (through the creation of e-plan templates discussed above), we have identified a number of minor consistency matters for MfE's consideration and comments for improved ease of use in e-plans. These are in addition to the main comments given above and are provided in the following table:

Section Ref	MfE Page Ref (Word doc)	Planning Standard requirement	Question/ Comment	Isovist suggested solution
F-2, F-3, F-4	54, 58, 60		Inconsistent/ inaccurate language between sections F-2 (planning maps) and F-3 and F-4 (spatial planning tools). Consider that the latter is more appropriate.	Replace references to 'planning maps' with 'spatial planning tools'.
F-6, Numbering Form	70	Instructions: 1	Spelling error 'Part 1 – Introduction and general rovisions'	Amend

F-6, Numbering Form	71	Instructions: 14 and 15	Inconsistencies with following examples compared to Instructions: 12 and 13 examples TEMP-P1 and NH-O1: RR - R1 (gaps), RR – REQ1 (long dash and gaps)	Fix inconsistencies
F-6, Table 28	74	District Plan Sections, SD - Strategic Direction	SD - Strategic Direction should be in the Chapter row	Move from Sections row to Chapter row
CM-1, Table 29	79	Access Strip and Allotment	the definitions of access strip and allotment are inconsistent with the rest of the definitions (as set out in box below) vs. (as set out in <u>the</u> box below)	Fix inconsistency
CM-1, Table 29	81	Coastal Marine Area	Incorrect alphabetisation	Move to below the definition of Cleanfill
CM-1, Table 29	81	Coastal Water	Incorrect alphabetisation	Move to above the definition of Commercial Activity
CM-1, Table 29	85	Definitions relating to Noise Standards	Incorrect alphabetisation. Understand the grouping because of topic though!	Order below the definition of Kaitiakitanga: L_{A90}, L_{Aeq}, $L_{AF (max)}$, Lake, Land, Land Disturbance, Landfill, L_{dn}, L_{peak}
CM-1, Table 29	86	Net Site Area	Inconsistent definition highlighting	Highlight the rest of the land and site links and remove over-colouring from the first line
CM-1, Table 29	90	Swale	Inconsistent definition highlighting	Highlight land and stormwater
CM-1, Table 29	91	Water Sensitive Design	Inconsistent definition highlighting and linking	Highlight and link stormwater
CM-1, Table 29	91	Wet Abrasive Blasting	Inconsistent definition highlighting and linking	Highlight and link water
CM-1, Table 29		All definitions	In an e-plan, definition terms get automatically identified regardless of context. Alternatives (e.g. plurals) and exceptions (e.g. 'legal <u>effect</u>')	Local Authorities will not be able to edit Standard definitions, so the MfE will need to provide (and maintain if necessary) the

			need to be identified to retain correct context.	alternatives and exceptions
General			In an e-plan, a concise label is required in order to identify those parts of a plan that are linked to the Standards and therefore potentially not open to Schedule 1 processes, e.g. definitions. Ideally this would be an abbreviation of 'National Planning Standard', however using "NPS" or "Standard" as labels can be confused with other instruments.	Provide an appropriate abbreviation

Releasing submissions

Please check this box if you would like your name, address, and any personal details withheld. ☐