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Planning Standards
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Submission by Kawerau District Council (KDC)

Draft National Planning Standards

Thank you for providing us with an opportunity to comment on the draft National Planning Standards.

KDC’s primary concerns relate to the requirements for electronic accessibility and functionality and the level of support that would be available from MfE to transition to the e-standards. This submission therefore deals specifically with the questions relevant to these issues.

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 to KDC to achieve ‘Level 5’ of the Electronic Accessibility and Functionality Scale is unknown at this stage. However, given the known status of KDC’s e-capability (including mapping), it is anticipated that there would be considerable expenditure required to achieve this level, particularly given that there is no indication that a national platform will be developed and made available for the transition.

KDC’s District Plan was made operative on 1 May 2012.
During the subsequent period, KDC has processed the following yearly numbers of resource consents (includes Certificates of Compliance):

2017/18 – 13
2016/17 – 12
2015/16 – 6
2014/15 – 7
2013/14 – 12
2012/13 – 6 (part-year from 1 May)

KDC responded to 205 service requests in the 2017/18 year for District Plan/Resource Consent related issues.

1% of KDC rates spending is the equivalent of $100,000.

At a cost of $60,000 (a conservative estimate) to achieve the proposed standard, transition to the system would equate to:

- On the basis of 15 resource consents per annum over 5 years, an equivalent of an additional $800 per consent (an average residential consent would be $350 currently).

- On the basis of 200 service request enquiries per annum over 5 years, an average of $60 additional per enquiry.

The cost of compliance appears very high relative to the benefits that would be obtained.

A less ambitious objective for KDC would appear to be appropriate.

The aim of the standards is to improve the customer experience making it easier for them to interact and understand plans. We consider that the service we currently provide achieves this aim with customers having direct access to a person for enquiries and easy reference to documents and maps (which are currently available online).

‘Level 2’ accessibility and functionality would seem an appropriate level for KDC activities and community interaction. 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 would be required. In order to achieve this we would require both a significant upfront and ongoing financial commitment.

It is understood that MfE is considering the development of a software option that smaller councils could access and utilise for the transition.
In the event that a variable standard relative to the size and structure of territorial communities and the associated number of resource consent applications and enquiries (and mode of response to these) is not made available, it is submitted that a common package capable of deployment within the existing IT platform made available at no cost to relevant Councils for implementation would be of significant benefit.

**General**

KDC has been party to discussions on the draft standards with the other local authorities comprised in the Bay of Plenty Region and supports the individual submissions made by these authorities.

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

Yours sincerely

Chris Jensen

**Manager, Planning, Compliance & Capability**

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