20 August 2018

Ministry for the Environment
Via email

Submission to Draft National Planning Standards (NPS) Consultation Document

1. The Central Otago District Council understands that there may be some benefits in having consistency in district plans across the country. The value gained by national direction, however, may be countered by an inflexible one-size fits all approach that stifles innovation and the ability for a plan to truly reflect the desired outcomes of a community. And the time and cost of complying with the NPS should not be underestimated.

2. Central Otago is part way through a full review of the district plan. Council’s approach is now to delay the plan review until the NPS is gazetted, and a National Policy Statement on Biodiversity developed, to avoid re-writing the district plan at significant cost to the community. Central Otago is in a period of strong growth so provision of appropriately zoned land will be addressed in the interim by the development of spatial frameworks and plan changes to the operative district plan.

3. The Draft Electronic Accessibility and Functionality Standard requires that a note and hyperlink be contained within a district plan rule to a relevant regional plan rule. The Central Otago District Council considers this too onerous. Identification of all the rules to be linked in the various plans would be a challenging, costly and risky undertaking. Failure to cross-reference correctly may put Councils into legal challenges.

4. 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. Not only is this inequitable, the costs are grossly underestimated. Central Otago has less than 13,000 ratepayers so the estimated cost for E-plan development at approximately $440,000 is totally unrealistic. Central Otago is a large geographic area facing significant challenges in a period of high growth, and there are many complex issues to be addressed. The development of an E-plan for the district is anticipated to be in excess of $1,000,000. This will result in a rate increase of approximately 4% for all Central Otago ratepayers.

5. The development of an E-plan is new and different from normal work of the Council and will require significant additional expertise and resource. The Council therefore requests financial...
and technical support to implement these changes, as it is an unfair burden on an already stretched ratepayer base.

We would welcome further discussion on any of the above matters.

Yours sincerely

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