



Ministry for the
Environment
Manatū Mō Te Taiao

2K ELECTRONIC ACCESSIBILITY AND FUNCTIONALITY STANDARD

Recommendations on Submissions Report for the first set
of National Planning Standards

This document may be cited as: Ministry for the Environment. 2019. *2K Electronic Accessibility and Functionality Standard – Recommendations on Submissions Report for the first set of National Planning Standards*. Wellington: Ministry for the Environment.

Published in April 2019 by the
Ministry for the Environment
Manatū Mō Te Taiao
PO Box 10362, Wellington 6143, New Zealand

ISBN: 978-1-98-857910-8 (online)

Publication number: ME 1406

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Context to this document

This document forms part of the suite of recommendations on submissions reports prepared for the National Planning Standards. It should be read in conjunction with the Overall Introduction and is likely to reference other recommendations on submissions reports listed below. The recommendations on submissions reports are organised as follows:

1. **Overall introduction**

- Explanation of all of the recommendations on submissions reports
- High-level submissions analysis

Detailed recommendation reports

2A. **Regional Policy Statement Structure Standard report**

2B. **Regional Plan Structure Standard report**

2C. **District Plan Structure Standard**

2D. **Combined Plan Structure Standard**

2E. **Chapter Standards report** including

- Introduction and General Provisions Standard
- National Direction
- Tangata Whenua Standard
- Strategic Direction Standard
- District-wide Matters Standard
- Designations Standard
- Schedules, Appendices and Maps Standard

2F. **Format Standard** including

- Chapter Form Standard
- Status of Rules and Other Text and Numbering Form Standard

2G. **Zone Framework Standard**

2H. **Spatial Layers Standards** including

- Regional Spatial Layers Standard
- District Spatial Layers Standard

2I. **Definitions Standard**

2J. **Noise and Vibration Metrics Standard**

2K. **Electronic Accessibility and Functionality Standard** including

- Baseline electronic accessibility
- Online interactive plans

2L. **Mapping Standard**

2M. **Implementation of the Standards**

1 Overview

The purpose of this planning standard is to prescribe requirements to improve the electronic accessibility and functionality of policy statements and plans. The draft standard had two main components:

- baseline electronic requirements
- standard for electronic plan (ePlan) requirements.

We received 51 submissions on the standard. About half of submitters acknowledged the need to improve the accessibility and functionality of policy statements and plans. Most of the submissions asked for clearer directions in the standard.

In this report, Section 2 outlines the submissions, analysis and recommendations relating to the draft baseline accessibility and functionality standards. Section 3 outlines submissions, analysis and recommendations relating to the draft requirements relating to the electronic plan requirements.

2 Baseline electronic accessibility and functionality requirements

We received 20 submissions that commented selectively across the instructions in the baseline electronic requirements. The majority of submitters suggested minor amendments to the standard to clarify the direction, but many submitters also expressed significant concern about the ability to successfully implement and maintain the instructions for what they consider to be of little value to the plan user.

2.1 12-month implementation timeframe

Instruction 1 relates to implementation timeframes. Submissions on implementation timeframes are considered in the Implementation report. But we note here that a general theme of submissions on this standard was that implementing the requirements was impractical. The 12-month timeframe contributed to this concern, but was not usually the primary issue.

We do not recommend changing this timeframe. Our approach instead has been to consider each requirement on its merits in light of the submissions received and consider whether the requirement is appropriate, rather than amending the timeframe as such.

2.2 Accessibility of the plan from the local authority website

One purpose of instructions 2 and 3 of draft table 18 was to ensure that planning documents are easy to access from a local authority website with no more than three clicks from the home page. A further purpose was to ensure the web page is labelled under a simple name (eg, District Plan). Most councils already do this, but notably some do not, with the result that plans are difficult to locate on their websites.

2.2.1 Submissions

Manawatu District Council agreed with these instructions. Bay of Plenty Regional Council requested clarification of which plans must be accessible from the home page and whether this is supposed to include all plans prepared since 1991. Te Rūnanga o Ngāi Tahu suggested hosting all plans and policy statements on local authority websites via a commonly named 'District Plan' or 'Regional Policy Statement and Plans' home page, and making them available in hard copy at local libraries and/or council buildings, or on request. The New Zealand Law Society requested a direction to ensure labelling makes policy statements and plans more accessible at each step.

2.2.2 Analysis and recommendations

We agree with the need to clarify which planning documents must be easily accessible from the home page. We suggest that only the operative and proposed plans (as defined in sections 43AA and 43AAC of the Resource Management Act 1991 (RMA)) must be accessible in no more than three clicks from the local authority website.

Though we agree with the New Zealand Law Society's submission on having clearer steps from the home page, we would introduce a potential risk of disrupting local authority's website structure if we further prescribe steps in locating the plan. Current practice on local authority websites of accessing planning documents is adequate and does not require further control than is currently proposed to achieve a consistent approach across all local authorities.

Te Rūnanga o Ngāi Tahu's suggestion is useful in principle for plan users that do not have access to the internet. However, it is already general practice to provide access to plans at libraries and council buildings. Making plans accessible on request is already achievable through the Local Government Official Information and Meetings Act 1987.

We recommend combining instructions 2 and 3 and reading them as meaning that all operative and proposed policy statements and plans must be hosted on a local authority web page that is no more than three clicks (three pages or pop-ups) from the home page of its website.

2.3 Web accessibility and web usability standards

Instruction 4 of draft table 18 stated that all regional policy statements and plans on local authority websites must comply with Department for Internal Affairs' Web Accessibility Standard 1.0 and Web Usability Standard 1.2 or their successors. The New Zealand Government Web Accessibility and Web Usability Standards are mandatory (following a 2003 Cabinet decision) for core central government agencies only.

The intent of this instruction was to ensure that those with disabilities and dependent on keyboard and screen-reader software to read online content are able to do so.

2.3.1 Submissions

Hutt City Council asked for guidance on how plans can comply with this instruction. Christchurch City Council critiqued the wording as having the potential to be misinterpreted as applying to regional councils only.

2.3.2 Analysis and recommendation

The publication of online content in PDF format only remains a significant and difficult accessibility issue to overcome. The PDF format has some shortcomings that make it inaccessible for some users. Even where users can access a PDF, many PDFs are not produced in a way that enables that accessibility.

We acknowledge that even though the specific web accessibility and usability standards referenced in the draft standards are not compulsory for local authorities, it was considered appropriate that these existing standards are applied to policy statements and plans. This was because of the high level of public interest in having these statutory documents freely accessible for all members of the public.

We continued to discuss the applicability of these standards with the Department of Internal Affairs with a view to providing guidance for local authorities in complying with the Web Accessibility and Web Usability Standards. We understand there are already Web Content Accessibility Guidelines (WCAG 2.1) which is required to be used by all local authorities. In light of this, we recommend removing this instruction.

2.4 Linking the plan and notifying the Ministry

Instruction 5 of draft table 18 required local authorities to provide the Ministry for the Environment with hyperlinks to their plans and regional policy statements and inform the Ministry if any hyperlink changes. Its purpose was to keep the Ministry's 'Find a council plan' portal up to date.

2.4.1 Submissions

Hutt City Council submitted that 'hyperlink' is the incorrect term in this context; rather local authorities would provide the Ministry with the 'web address' of their plans. Bay of Plenty Regional Council asked for this instruction to be removed, suggesting that complying with instruction 2 of draft table 18 is sufficient.

2.4.2 Analysis and recommendation

We agree that 'web address' is the accurate term for achieving the intended purpose of this instruction. The Ministry provides a service to access local authority policy statements and plans through a national portal. It is important that these links are updated. Therefore, we recommend local authorities provide web addresses for their policy statements and plans to the Ministry for the Environment and inform the Ministry if any web address changes.

2.5 Information on when a plan was last updated

Instruction 6 of draft table 18 required policy statements and plans to contain information on when they were last updated.

2.5.1 Submission

Allison Tindale expressed concern about this instruction because identifying when each provision in the current plan was last updated could be a very complex and time-consuming task for councils that have followed a rolling process in undertaking a review. In her view, the cost of providing this information retrospectively for existing provisions outweighs its benefits.

2.5.2 Analysis and recommendation

We disagree that this task is complex. Local authorities are already required to provide information on when their plans were last updated, although we accept that this information may not be located within the plan itself. The reason for including it in the plan was to ensure plan users could find the information quickly.

We note that Auckland Council has a higher enquiry rate on this information than any other council. This would justify making this information publicly accessible. For smaller councils, this is likely to be an unnecessary task.

On reflection, taking into consideration general submissions that seek to reduce the amount of information contained within the plan itself, we accept that, provided a council supplies the information on its website, this requirement could be removed. Therefore, we recommend removing this information as a direction and providing guidance instead that clarifies expectations on where this information is located on the council website.

This recommendation aligns closely with a recommendation elsewhere to remove ‘plan update tables’ from the Introduction and General Provisions Standard and locate these on council websites instead.

2.6 Providing a note and link to another plan

Instruction 7 of draft table 18 required local authorities to provide a ‘note’ within any district or regional plan rule (and hyperlink to relevant plan) that clarifies an activity may also require consent from another plan.

The purpose of this instruction was to alert the plan user to any activities that may have rules or other provisions in both district and regional plans. This practice is common for matters such as earthworks where a resource consent may require a resource consent from another plan that the plan user may not be aware of.

2.6.1 Submissions

All 20 submitters on this requirement expressed concern over the feasibility of successfully implementing this requirement. In particular, they were concerned about the additional costs and time required to monitor and analyse these connections and maintain hundreds of hyperlinks to documents that other organisations maintain. Both documents are regularly being changed and updated, and the other document may not be in a format that will allow for direct hyperlinks to the specific provisions in question. The risk of having dead links when councils are not aware of a change reduces the quality of the plan.

2.6.2 Analysis and recommendation

We agree that the level of work required to keep links up to date and accurate is potentially more than it is worth to plan users. In practice, it may lead to a significant amount of ‘notes’ covering the plan when activities intersect. We accept that, in practice, local authorities would struggle to implement and maintain this standard in its current form.

There is benefit in notifying plan users that certain activities may require consent from another plan. This point will be included as guidance to councils for when they are doing activity-based queries in an ePlan. Therefore we recommend removing this instruction and providing further detail on activity-based searches in ePlans. We also note an expectation that ePlan software developers will continue to work towards a future state for ePlans that have the ability for plan queries across multiple plans. This would help to achieve the outcome that this original instruction was seeking.

2.7 Hyperlinking within PDF plans

Instruction 8 of draft table 18 required links to be provided between significant planning provisions (eg, hyperlinks within the policy statement or plan, tabulation or bookmarking). This instruction is required only for local authorities that use PDFs to represent their policy statements or plans. Its purpose is to improve referencing within basic PDF plan documents to reduce time searching between related plan provisions.

2.7.1 Submissions

The Horticultural Society of New Zealand requested that definitions are hyperlinked where they are referred to in plan provisions. Hutt City Council and Bay of Plenty Regional Council commented that it is unclear what qualifies as a significant provision that requires a link. Horizons Regional Council asked for clarification of whether this standard applies to ePlans that provide the function to download sections of the plan in PDF format.

Whangarei District Council submitted that standard baseline requirements are generally supported. However, it saw the use of embedded hyperlinks within PDF documents suggested in instruction 8 as counter-intuitive. These are not universally compatible and there is no practical way to monitor the health of these hyperlinks, which may reduce accessibility and functionality. The council argued that the use of embedded hyperlinks should be discouraged in PDF plans.

2.7.2 Analysis and recommendation

We accept that the term 'significant' is ambiguous and, if we were to continue to implement the direction, we would have to describe what provisions must be hyperlinked. We also agree with Whangarei District Council's concerns about the use of hyperlinking for PDF-based plans.

There is benefit in linking provisions but we acknowledge that PDF is a format that does not realise this ability effectively. This is another reason for transitioning to ePlans – a format that is significantly better at achieving this direction.

Therefore we recommend removing this instruction and making it a requirement to include the ability to link between plan provisions, including definitions of terms, when viewing them in an ePlan.

2.8 Word search functionality

Instruction 9 of draft table 18 required plans and regional policy statements to support key word search functionality. This requirement applies only to local authorities that use PDFs to present their policy statements or plans. Its purpose is to improve functionality in the minority of councils still presenting their plans in static documents that do not provide word search functionality.

2.8.1 Submissions, analysis and recommendation

Manawatu District Council and Hutt City Council supported this instruction. Genesis Energy suggested that providing this functionality for individual chapters. Hutt City Council suggested making the instruction a requirement for digital plans as well as those in PDF format.

This instruction would still require key word search functionality for individual chapters of plans. Therefore, we suggest no changes are needed to clarify this. We agree and recommend that this feature should be included for all plans, including ePlans.

2.9 Legal status of provisions

Instructions 10 and 15 of draft table 18 required the legal status of provisions to be displayed (including in downloaded or printed format) and to make a clear differentiation between proposed, decisions made, appealed and operative provision within the plan. The purpose of these instructions is to help plan users identify the legal status of provisions and rules in plans. They were similar to those set out in the draft format standard.

2.9.1 Submission

The New Zealand Law Society and Manawatu District Council supported these instructions. The New Zealand Law Society stated that the Environment Court had recently commented on the need to make clear the legal status of provisions at each stage of the process and the legitimacy and certification of the provision. This includes noting where provisions are made operative, treated as operative or of legal effect. Hutt City Council requested clarification of how the instructions apply to proposed plans and policy statements. Bay of Plenty Regional Council does not envisage that there would be proposed, decisions made, appealed and operative provisions shown within the plan; rather, the web or ePlan would show both the operative and proposed changes at various stages in their process as they currently do.

2.9.2 Analysis and recommendation

Identifying the legal status of provisions is already a requirement under the RMA (section 86E), but an explicit reference to this in plans was considered necessary to help achieve more consistent interpretation of plans. This issue is also addressed in the recommendations report on the Format Standards. All submissions analysis is set out in that report but we note here that the recommended outcome is to remove any instructions on this matter from this particular standard.

2.10 Versions of plans available on the local authority website

Instructions 12 and 13 of draft table 18 required that all versions of the current plan since that plan first became operative must be available from the local authority website. In addition, a copy of all previous plans under the RMA, both the version at the time it first became operative and the final version before it was superseded by the replacement plan, must be available from the local authority website (in PDF format).

The purpose of these requirements was to make previous plan content instantly accessible to plan users (ie, 24 hours a day, 7 days a week) and to significantly reduce public enquiries to council staff. It was considered this would ensure continued progress in digital record-keeping and reduce the need for paper file storage.

2.10.1 Submissions

CivilPlan Consultants Limited is the only submitter to directly support both requirements.

Most submitters on both instructions were from local government. All local government submitters opposed the requirements because of the volume of information that will need to

be made publicly available within 12 months of gazettal. The main concern revolved around their experience that public enquiries are not a significant burden to the extent that it justifies the time and costs involved in implementing these instructions.

Taupō District Council noted that the Local Government Official Information and Meetings Act 1987 provides a mechanism, process and set timeframes for councils to supply information. It considered the instructions represent a huge amount of work for very little gain, noting it has approximately 45 versions of the current plan (variations, plan changes, clause 20a changes and a reformat). These versions are all broken into 50 separate PDFs, one for each chapter. To meet the requirements, it would need to stitch 50 different documents together for each of the 45 versions. The council expressed concern over the size of the documents this process would produce. The same would then need to be done for 120 maps. To keep documents to a manageable downloadable size, the council estimated it would need to provide about 420 documents on the website for the current plan alone (not counting transitional RMA plans).

Hutt City Council (HCC) stated that:

... if someone is interested in what provisions applied for a property in the past, they are able to contact HCC and ask us to investigate it for them. If it is necessary to show all previous versions of a current operative plan on the website so that plan users can investigate what provisions previously applied to a property at a particular point in time, by the same logic it would also be necessary to show all previous versions of previous operative plans.

Ten submissions expressed concern that having previous plan information readily available online may confuse plan users and lead them to use the wrong plan version. Wellington City Council considered it unnecessary to place a whole previously operative plan online. Its experience is that users requesting previous plan versions generally only enquire about specific chapters, parts or sections.

Wellington City Council suggested that councils should only be required to provide copies of completed plan changes, not every version of the entire plan. Marlborough District Council suggested removing these instructions from the standards and encouraging councils to hold all plan versions digitally as good practice, especially as there are already legislative mechanisms for providing this information.

Waipa District Council, New Zealand Planning Institute, Waitomo District Council, Hutt City Council and Porirua City Council suggested making previous plan versions available on request.

The Joint Southland Councils' technical submission recommended making clear that superseded versions of operative plans could be located in an archive rather than on that plan's home page. Its reasoning was that providing older versions of a plan on that plan's home page may generate confusion.

2.10.2 Analysis and recommendation

These two instructions generated significant discussion during the roadshow and in submissions. Their purpose was to reduce front-counter workload for councils responding to enquiries from plan users and consent applications about older plans. In light of submissions on these two instructions, we accept that in practice there is likely minimal benefit from requiring all previous plans and versions of current plans to be instantly accessible from the local authority website within 12 months of gazettal if enquiries are

infrequent. We also accept that this would create significant work for local authorities within the proposed 12-month timeframe.

Though some submitters suggested revising the instructions to allow local authorities to provide previous plan information on request, the Local Government Official Information and Meetings Act 1987 already provides the process, so it is not necessary to repeat this existing statutory obligation in the standard.

Therefore, we recommend removing instructions 11 and 12 and instead producing guidance to set expectations around what version of plans should be made available on council websites.

2.11 Open data uploaded to data.govt.nz in standardised datum and projections

Instructions 13 and 14 of draft table 18 required local authorities to upload publicly accessible, existing digital plan data such as plotted features, polypoints and polygons to data.govt.nz in machine-readable format in accordance with OpenData principles. These data will be required to be uploaded in the following standardised projection and datums: New Zealand Transverse Mercator 2000 (NZTM2000), New Zealand Geodetic Datum (NZGD2000) and New Zealand Vertical Datum 2016 (NZVD2016).

The purpose of these instructions is to allow interested plan users to gain free and easily accessible geospatial information in a consistent format.

2.11.1 Submissions

We received 10 submissions on these instructions. Eight submitters supported in principle the benefits of the instructions, with minor adjustments to the wording to improve interpretation. Bay of Plenty Regional Council submitted that having plan information freely accessible will improve policy analysis across its region. Trustpower Limited commented that it will gain huge efficiencies in being able to include existing council GIS information along with its own GIS information. New Zealand Planning Institute and Waitomo District Council opposed these instructions as they were unsure of any benefits of open data, expressing concern over how it would be kept up to date.

Regarding the datum requirement, Land Information New Zealand (LINZ) supported the use of the projection and datum requirements. It stated that LINZ has the functionality to support local authorities and others to transform their data sets and offer a number of tools that can assist with data conversions to assist local authorities within the 12-month timeframe.

The Joint Southland Councils' technical submission considered that all geospatial information would be required to use NZVD2016 when its data do not commonly require one. It requested clarification of the context in which it would be used. Tauranga City Council requested that it continue to be able to use its Moturiki Datum.

2.11.2 Analysis and recommendation

We agree that open data offers benefits across all sectors, which supports the Government's expectations on open data. Many local authorities already provide planning map data in portals other than data.govt.nz. In this instance, local authorities should only be required to list

the information and provide data.govt.nz with a link to the relevant information so that the central portal can direct users to this information.

We agree on the need to clarify how often data sets should be updated. We understand costs are involved, which vary depending on the size of storage, if the local authority is required to maintain older records in open data. The ability to download data that is out of date for the purpose of analysis offers little benefit to a plan user. Therefore, on balance, we consider that data sets uploaded to open data should be updated once they form part of an operative or 'treated as operative' plan.

We acknowledge specific context is necessary to establish when a vertical datum must be used. We discussed with LINZ again the issue of converting local datums to NZVD2016. We acknowledge that some councils may find it difficult to adjust to using a geodetic datum; however, LINZ has submitted that it will support local authorities with data conversion. We do not consider it necessary to convert current plan information but we recommend requiring that any new plan information using a vertical datum must be compliant with NZVD2016.

Therefore we recommend publicly accessible digital data sets used in the preparation of policy statements and plans, available under Creative Commons attribution CC BY 4.0 licensing, must be listed or uploaded to data.govt.nz in machine-readable, non-proprietary format. Any amended planning map digital data sets must be uploaded or listed once they become operative to data.govt.nz in machine-readable, non-proprietary format.

Datums and projections must be compliant with NZGD2000 and NZTM2000. New plan information using a vertical datum must be compliant with NZVD2016.

2.12 Identifying provision types

Instruction 16 of draft table 18 required policy statements or plans to identify whether the provisions are regional policy statement provisions (section 62, RMA), regional plan provisions (section 63), regional coastal plan provisions (section 64) or district plan provisions (section 72). In an ePlan, these provisions must be searchable and able to be compiled.

2.12.1 Submissions

Hutt City Council requested that this instruction be removed for stand-alone district plans. It also raised the concern that councils would not be able to achieve this requirement with their current electronic capabilities. CivilPlan Consultants Limited and West Coast Regional Council supported this instruction. West Coast Regional Council stated it will implement the instruction when it combines its plan, which is likely to be after the 12-month timeframe.

Northland Regional Council stated the instruction requires regional coastal plan provisions to be identified (section 64, RMA). While it is a minor issue, the council does not support this because it is not a legal requirement of the RMA and the council is not aware of any benefit to plan users. Identifying the coastal marine area provisions for the purposes of the Minister of Conservation's sign-off is an administrative issue that can be addressed outside the plan. If it is to be retained, then the council suggests amending the reference to "the parts that relate to the coastal marine area" to reflect the wording of section 64(3) of the RMA.

2.12.2 Analysis and recommendation

In accordance with recommendations made in various reports relating to how coastal provisions are structured within plans, we no longer consider it necessary to impose this requirement through the standards. Section 80(8)(a) of the RMA sets out provisions in combined plans must be clearly identified, and the Format standard explains how this should be done.

3 Standard for online, interactive plans (ePlan)

3.1 Background

The draft standard proposed that all plans transition to an electronic plan (ePlan) because ePlans provide a significantly improved user experience for people unfamiliar with RMA plans. For example, a homeowner can easily find out if a resource consent is required for a proposed new garage by doing a property or activity search query on the ePlan. In contrast, navigating through traditional paper-based plans is often overwhelming for these plan users. Professional plan users can still read the plan online as if it were a hard-copy document. Twenty-two per cent of councils already have an ePlan or are currently developing one.

The draft standard required ePlans to be at Level 5 on the Electronic Accessibility and Functionality Scale in the planning standard. The Ministry for the Environment developed this scale to show the different levels of electronic accessibility that currently exist and what they might be in future. Level 1 represented a paper-based plan, accessible on a website as a 'static' PDF. Level 5 was described as an 'ePlan that is spatially integrated with GIS system, allowing click to drill through different map layers and specific rules that apply to particular properties of activities and infrastructure services'.

About half of the 51 submitters directly supported the transition to ePlans.

Four key points that submitters raised were: general concerns around the clarity of the standard; a request for a national software platform; restrictions on internet access; and printing online maps.

Submitters also raised concerns about the implementation of this standard. For example, Opotiki District Council and Kawerau District Council opposed this standard on the basis that the level of enquiry and processed resourced consents is low and that they can fulfil their customer experience with access to a planner in-house. This issue is addressed in the Implementation Report.

3.2 Clarity of the standard – use of the ePlan scale

3.2.1 Submission, analysis and recommendation

About half of submitters requested clarification of the directions to make it easier to understand the expected requirements of an ePlan. It was evident that the use of the ePlan scale (figure 1 in the draft standard) and the additional description of the different levels, as set out in table 20 in the draft standard, were confusing for submitters.

We accept this feedback and recommend removing the 'ePlan scale' from the standard (but moving it to guidance for reference). We also recommend redrafting the requirements based more closely on the descriptive text originally set out in table 20, noting the recommendations below related to specific issues identified in submissions.

3.3 National ePlan software platform

3.3.1 Submission, analysis and recommendation

Harrison Grierson Ltd believes that having a consistent national GIS platform would be important to ensure that users have a consistent experience across the country, regardless of the software they are using. Waitomo District Council, Tauranga City Council and Tasman District Council also suggested that using a nationally consistent software provider to implement ePlans.

We have previously evaluated this as an option in the Section 32 report, which was published alongside the standards at the consultation stage. Though we accept having a consistent platform brings benefits, our analysis of both the costs and benefits of that approach alongside other options led to the conclusion that it was not the preferred option. We do not recommend taking this approach at this time.

3.4 Internet access

3.4.1 Submissions, analysis and recommendation

Opotiki District Council and MidCentral Public Health Service expressed concern that some areas in New Zealand do not have sufficient internet connectivity to support ePlans. 2degrees, Vodafone New Zealand Limited, Spark Trading New Zealand Limited and Telecommunications Forum Inc submitted that 97 per cent of New Zealanders have the ability to access electronic planning documents. Mobile and fixed-line access via the rural broadband and ultra-fast fibre projects will lead to connectivity almost anywhere in New Zealand. Access is continually being improved by the roll-out of new technology and networks, the next being 5G.

We disagree that internet limitations in some areas justifies a decision not to pursue the benefits of an ePlan. Based on submissions from the telecommunications industry, most people in the country have internet access that allows them to access electronic planning documents. Few members of the public currently keep a copy of the district plan at home so, in reality, the 3 per cent of people who cannot currently access a plan online when they need to would have to visit a council or library to access it and they could continue to do so.

We also note the implementation report's recommendation to extend timeframes for meeting ePlan requirements to 10 years for councils with small ratepayer bases (below 15,000). These are commonly rural local authorities so we expect internet access will have improved by the time these local authorities implement this instruction.

Therefore, we do not recommend any changes to this instruction.

3.5 Printable maps with a GIS viewer

3.5.1 Submissions

Spark, Vodafone New Zealand Limited and 2degrees separately submitted that the requirement to have printed maps should be discretionary because an ePlan provides the ability to print the material relevant to a particular project, including the plans. For councils that continue to use and search PDF documents, the requirement to have printed plans and maps is important.

New Plymouth District Council submitted that it:

... does not agree that planning maps must be completely printable and question what the intended purpose of this is. This implies that the National Planning Standards still require Councils to have a paper based plan which is contrary to the key purposes of an e-plan. E-plans have the functionality to compare maps online. Making planning maps printable and in particular for the whole Plan would be a step backwards for GIS data maintenance and may run the risk of losing 'one source of the truth' for GIS data at that point in time. Every time the planning map is updated, Council will still need to maintain the paper based version, which is doubling up. New Plymouth's e-plan does include printable property reports that include a property based planning map and aerial snapshot.

Hutt City Council submitted that:

... it needs to be clear whether this needs to be through the electronic plan or whether it can be elsewhere on the website. While you can download and print any chapter or section of the HCC District Plan through the HCC ePlan, it is a bit awkward to download and print the entire plan. For the District Plan to be downloaded or printed through the ePlan, the ePlan needs to create a PDF of the entire District Plan, and this can be constrained by computing power and network speeds. This is only a problem when printing the entire plan or large chapters, and is not a problem when printing smaller sub-chapters or specific provisions.

It is also awkward to try to download or print the District Plan maps through our District Plan GIS viewer. It would be preferable to be able to ... enable the full District Plan (including maps) to be downloaded or printed on the Council website but not from within the ePlan.

3.5.2 Analysis and recommendation

The intent of this requirement was not that all plan maps continue to be printed, but that the ePlan functionality existed on the GIS viewer to enable users to print part of a plan map. However, in light of submissions on this matter, it is clear that the instruction as drafted could be interpreted to mean councils have to maintain paper copies of planning maps.

We agree that requiring ePlans to have the ability to print the entire plan map would lead to an excessive amount of duplication and use of paper. The online GIS viewer of a map should be the current source of truth of planning maps. All electronic devices have the ability to capture an image of what is displayed on the screen. We recommend removing that specific requirement, but that guidance continues to make it clear that plan users should be able to capture images of online GIS map viewers to help them prepare resource consent applications, for example.