

**Title: Auckland Council Feedback on Discussion Documents on the National Planning Standards**

Feedback to Ministry for the Environment

**1 Introduction**

This feedback is from Auckland Council, Private Bag 92300, Auckland 1142.

- 1.1 This feedback is on the following discussion papers: district plan structure, structure of regional plans and policy statements, zones and overlays, formatting plans and policy statements, plan mapping standards, definitions, metrics, electronic functionality and accessibility of plans and general provisions.
- 1.2 This feedback has been endorsed by the council's Planning Committee (a Committee of the Whole).
- 1.3 Council would welcome the opportunity to continue to provide feedback to the Ministry, as required. Contact can be made through Linley Wilkinson, Lead Planner, Plans and Places Department - [linley.wilkinson@aucklandcouncil.govt.nz](mailto:linley.wilkinson@aucklandcouncil.govt.nz)

**2 General Comments**

- 2.1 The Auckland Unitary Plan consists of four statutory formats: eplan, PDFs, HTML, GIS viewer. Any change to text no matter how small (style/layout) will require change in three versions of the text and in GIS (depending on change) – this has time and cost implications.
- 2.2 Some discussion papers overlap and a level of integration will be required before a standard can be delivered. For example a mapping standard will need to reflect the structure of a plan and therefore any standard on either of these topics should be developed together.

## Feedback

For the purpose of our feedback the following assessment has been used:

Low impact	An easy straightforward change required to the Auckland Unitary Plan with no consequential amendments other than possibly a renumbering.
Medium Impact	A significant change is required with no consequential amendments.
High Impact	A significant change is required with consequential amendments throughout the Auckland Unitary Plan.

### 3 Feedback on Discussion Paper B: District plan structure

#### Preferred option

##### Option 2:

Combination zone and topic-based plan with integrated objectives, policies and rules.

In this option, each district wide national significant or district wide amenity and zone based chapter includes all the relevant objectives, policies, rules and performance standards.

- 3.1 The Auckland Unitary Plan's structure closely aligns with the preferred chapter structure for combining objectives, policies and rules for both zone and topic based regional and district plan provisions. Generally this proposed arrangement of provisions would have a low impact on the Plan, however see paragraph 3.3 for where the Plan does not align with this approach.
- 3.2 It is unclear whether the Standard will go further and define the actual chapter headings or organise topics into district wide significant matters or district wide amenity matters. It is also unclear how this content relates to overlays – another spatial tool used in the Auckland Unitary Plan. Moving topics into “other layers” could potentially have a high impact as the referencing of provisions is extensive throughout the layers of the Plan.
- 3.3 The Discussion Paper acknowledges the need for unitary plans that have combined regional and district plans to have a greater level of flexibility. The council fully supports the need for flexibility as the Auckland Unitary Plan structure has been developed in a manner that fully integrates it's regional and district provisions. For example the Plan has topics (eg water quality) where the rules are integrated in other sections of the plan to assist the Plan user. To unpick this level of integration is considered a backward step and would have a high impact of change on the Plan.

- 3.4 Although the Plan aligns with the preferred provision structure with regard to vertical hierarchy, council would still want to retain flexibility in topic headings, what matters are deemed district –wide versus overlays and whether some topics have the objectives and policies separate from the rules.
- 3.5 Any structure/zone change has a significant impact on the functionality of the Unitary Plan GIS viewer.

#### 4 Feedback on Discussion Paper C: Zones and overlays – spatial layers in plans

##### Preferred option

##### Option 3:

Large suite of zones, standardised overlays that relate to nationally significant matters and standardised district wide amenity matters.

This option provides a menu of 27 zones relevant for district plans that reflect the common zones applied in larger provincial and metropolitan centres.

##### Feedback

- 4.1 The Auckland Unitary Plan contains 45 zones and 34 overlays. In addition to zones and overlays the Plan also has other spatial layers including precincts and mapped controls including the height variation control. A significant zone harmonisation exercise took place through the development of the Plan to simplify this zoning framework and to apply the zones in a pattern which achieves the objectives of the Regional Policy Statement which seek a quality compact urban form.
- 4.2 Given the growth pressures facing Auckland the commercial and residential zones provide for significant intensification whilst also ensuring there is housing choice. The objectives, policies and provisions are finely balanced, in each zone, to provide opportunities for intensification whilst still ensuring that character and amenity objectives can also be achieved.
- 4.3 The preferred zones in the discussion paper will fundamentally change the zoning framework in the Plan through the deletion and merger of key zones as well as the potential standardisation of objectives, policies and provisions. More flexibility will be required for combined plans to support the use of a zoning approach for different locations within the coastal marine area.
- 4.4 The table below assesses the impact of the preferred option on the Plan.

Proposed Zone Framework	Auckland Unitary Plan Zone Framework	Comment
<b>Residential</b>		
Residential Zone		<p>High Impact – The proposed residential zone structure will result in a high impact change to the Plan. This proposal will result in the merger of the THAB and MHU zones, the merger of MHS and SH zones and the deletion of the Large Lot and Rural and Coastal Settlement zones. It is not clear what zone will be applied to land currently zoned Large Lot or Rural and Coastal Settlement.</p> <p>The proposed zone framework will result in a major policy shift in the approach to zoning urban residential land in Auckland. This structure will not provide for the same transition in density, height and character currently provided through the six residential zones.</p> <p>There will be significant consequential amendments throughout the plan to reference the change in zone name and to ensure any precincts are still compatible with the underlying zone.</p>
Greenfield Residential Zone	Future Urban Zone	
Medium Density Residential Zone	Single House Zone (SH) and Mixed Housing Suburban Zone (MHS)	
High Density Residential Zone	Mixed Housing Urban Zone (MHU) and Terrace Housing and Apartment Building Zone (THAB)	
	Large Lot Zone and Rural and Coastal Settlement Zone	
<b>Commercial</b>		
Commercial Zone	General Business Zone	<p>High Impact – The proposed commercial zone structure will result in a high impact change to the Plan. This proposal will result in the deletion of the Business Park and Metropolitan Centre zones.</p> <p>The proposed zone framework will result in a major policy shift in the centres hierarchy in Auckland which stems from the Auckland Plan. The CBD is at the top of the hierarchy followed closely by Metropolitan centres which are major community, commercial and public transport hubs servicing multiple neighbourhoods. The Metropolitan Centre zone provides for a greater scale and intensity of development than the Town Centre zone. It is unclear whether the metropolitan centres will be zoned City Centre or Town Centre zone.</p>
City Centre Zone	City Centre Zone	
Town Centre Zone	Town Centre Zone	
Mixed Use Zone	Mixed Use Zone	
Local Commercial Zone	Local Centre Zone	
Neighbourhood Commercial Zone	Neighbourhood Centre Zone	
	Business Park Zone and Metropolitan Centre Zone	

		There will be significant consequential amendments throughout the plan to reference the change in zone name and to ensure any precincts are still compatible with the underlying zone.
<b>Industrial</b>		
Industrial Zone		Medium Impact – There will be consequential amendments required throughout the plan to reference the change in zone name.
Light Industrial Zone	Light Industry Zone	
Heavy Industrial Zone	Heavy Industry Zone	
<b>Rural</b>		
Rural Zone		High Impact – The proposed residential zone structure will result in a high impact change to the Plan. The proposed zone framework will result in a major policy shift in the rural zoning strategy under the Plan as it will result in the merger of the Rural Production zone and the Mixed Rural Zones as well as the Countryside Living zone and the Waitakere Foothills zone. It will also completely delete the Waitakere Ranges Zone.  It is not clear what zone will be applied to the Waitakere Foothills. In order for the plan to continue to provide for local variation within the Waitakere Ranges a precinct or sub zone may have to be introduced. It is unclear if this can be inserted as a consequential amendment of a mandatory amendment.  There will be significant consequential amendments throughout the plan to reference the change in zone name and to ensure any precincts are still compatible with the underlying zone.
Rural Residential Zone	Rural Production Zone, Mixed Rural Zone	
Rural Settlement Zone	Countryside Living Zone and Waitakere Foothills zone	
Rural Coastal Zone	Rural Coastal Zone	
Rural Conservation Zone	Rural conservation Zone	
	Waitakere Ranges Zone	
<b>Open Space</b>		
Open Space Zone	Civic Spaces Zone and Community Zone	High Impact – The proposed open space zone structure will result in a high impact change to the Plan. This proposal will result in the merger of the Civic Spaces and Community zones.
Informal Recreation Zone	Informal Recreation Zone	
Sport and Active Recreation Zone	Sport and Active Recreation Zone	
Natural Conservation Zone	Natural Conservation Zone	There will be significant consequential

		amendments throughout the plan to reference the change in zone name and to ensure any precincts are still compatible with the underlying zone.
<b>Special Purpose</b>		
Airport Zone	Airport Zone	High Impact – The proposed special purpose zone structure will result in a high impact change to the Plan. This proposal will result in the merger of the School and Tertiary Education zones. It will completely delete the Cemetery Zone Major Recreation Zone Maori Purpose Zone and Quarry Zones and it is not clear what zone will be applied to properties currently within these zones.  There will be significant consequential amendments throughout the plan to reference the change in zone name and to ensure any precincts are still compatible with the underlying zone.
Port Zone	Port Zone	
Hospital Zone	Hospital Zone	
Tertiary Education Zone	Tertiary Education Zone, School Zone	
Stadium Zone	Stadium Zone	
	Cemetery Zone Major Recreation Zone Maori Purpose Zone and Quarry Zone	

## 5 Feedback on Discussion Paper D: Structure of regional plans and policy statements

### Preferred Option

#### Option 2:

High level chapters based on subject, whether by theme, catchment, environmental domain or outcome. Subserving chapters are then issues based, and the methods, objectives and other matters for that issue are placed within the same sub-chapter.

The regional policy statement, regional plans and regional coastal plans are combined into one document, but as separate chapters.

#### Feedback

- 5.1 The preferred option for structuring regional plans is largely consistent with the regional plan component of the Auckland Unitary Plan which follows the topic based approach and objectives, policies and rules are located with each topic/issue – generally (see paragraph 3.3 and 5.2 for when this is not the approach).
- 5.2 However, the Auckland Unitary Plan consolidates a number of overlay, zone and Auckland-wide rules that are likely to relate to a particular topic, into one sub-chapter

(e.g. Infrastructure). This means that overlay rules for example, are identified in the activity tables where they are located in sections of the Plan dealing with Auckland-wide rules, rather than with the overlay itself. For example Land disturbance – Regional contains rules relating to the Significant Ecological Areas overlay. Further, many of the E26 Infrastructure activities relate to particular overlays or Auckland wide provisions i.e. see Table E26.1.1.1 Structure.

- 5.3 The Discussion Paper acknowledges that any national planning standard relating to plan structure will need to have a greater level of flexibility to work within the context of combined (unitary) plans. Council supports the need for flexibility in order to retain a fully integrated unitary plan.
- 5.4 The Auckland Unitary Plan is consistent with the preferred options as it already combines the regional policy statement, regional plans and the regional coastal plan. However, the regional plans and the regional coastal plan are not contained as discrete chapters and there would be a high impact on incorporating this approach. Creating a discrete regional coastal plan chapter would create duplication and potential inconsistencies as provisions such as noise controls would need to get repeated in both the “region-wide” section and the regional coastal plan.

## 6 Feedback on Discussion Paper E: Formatting plans and policy statements

### Preferred Options

#### Options:

Table based format for objectives and policies.

Text-table hybrid that summarises the components of the rule provisions but separates out the performance standards.

#### Feedback

- 6.1 The table below provides an overview of how the Auckland Unitary Plan will need to be amended to achieve consistency with the proposed format outlined in the Discussion Paper.

Formatting topic	Preferred approach in the Discussion Paper	Auckland Unitary Plan approach	Degree of Change and Implications for the Plan and Comments
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Objectives and policies	Table based format to show what policies linked to the objective.	Text based approach that groups objectives separately from the policies.	<p>Medium impact. Disagree with this approach as policies will be duplicated where they implement more than 1 objective. Tables also don't work when there are lengthy policies – more likely to be the case given the approach to have minimal use of assessment criteria and relying on policies instead. Also formatting within a table is often fraught.</p> <p>An option not considered is grouping objectives separately from policies. Potential criticism of this approach is the lack of clear linkage but this can be overcome by a small reference at end of the policy. Or (which is more important) it is clear in the wording of both the objective and policy of the link.</p>
Rule formats	Text –table hybrid in option 2. The activity table includes the matters of discretion for discretionary activities (set up as an infringement of standards). Standards are in a separate section within the chapter or form a separate chapter.	Auckland Unitary Plan activity tables are a mixed bag now – with many variations. However the matters of discretion for infringement of standards sit with the other matters in a separate section – not within the activity table.	<p>High Impact. However given that the Plan is now so inconsistent maybe it would be a good to have to conform to a standardised approach. Although it would need to be flexible to enable an Auckland wide/overlay vs a zone.</p> <p>The option 2 in the Discussion Paper is repetitive by stating the activity status three times (heading, description and in the activity status). This</p>

			<p>does not seem to accommodate an activity that goes across multiple zones or overlays (eg Auckland-wide). Is inaccurate by listing matters of discretion for a discretionary activity. By including matters of discretion for an infringement inside the activity table means that “matters” are now in two places – confusing.</p> <p>Also need to think how an e-planning ‘line of inquiry’ can be done on this.</p>
Tables of content	Likely to specify a format for table of contents. Eplans should include links to the content.	Table of Contents for both the Pdf and eplan version – but links are only to definitions.	<p>Low impact. Disagree that this is necessary for the eplan version of the Auckland Unitary Plan.</p> <p>An eplan table of contents is redundant when you have a tree setting out the layers on the page. Adding hyperlinks is possible but will need to be maintained manually whereas the tree approach automatically updates itself when content is updated.</p>
Numbering	Distinguishes between the different elements – objective, policy, rule. Maximum of four levels – Rule 11.2(a)(ii). Alpha-numeric system and resilient to plan changes.	AUP uses “Table H3.4.1 Activity table”.  Rule C1.13(4)  Policy H3.3(2)	<p><b>High Impact.</b> Any change to numbering has a <b>significant impact</b> on the reporting done by resource consents. This is a standard that is best done at plan review – not in the middle of a plan’s life.</p> <p>Adding a name is useful and is mostly done in the</p>

			<p>Auckland Unitary Plan when referencing (only) another part of the plan internally. I suspect it is also done “informally” when referencing the plan rather than is written in the text. Do not agree if the name is included when it is already in that section.</p> <p>Four levels is aspirational but will not accommodate a complex plan.</p>
Headings	No preference provided other than headings and subheadings could be standardised.		Medium impact as the whole plan would need to be changed manually.
Legible text	Choice of options given – prescribed font size and style or parameters to conform with.		Option 2 is our preference to minimise change. Changing font style and size is doable in e-plan software but the whole plan would need to be checked to ensure no errors have been made.
Illustrations	No preferred option given.	Auckland Unitary Plan already uses illustrations where possible.	
Colour	No preferred option other than indicate that eplanning may see a move towards using colour.	Auckland Unitary Plan uses colour in the plan’s front “banner” to distinguish between the different versions of the plan.	Low to medium depending on the standard.
Page layout	Preference portrait layout.	Auckland Unitary Plan uses portrait. Icon cannot accommodate landscape.	No impact if the standard only specifies portrait. Note that an eplan software can often control this.
Eplanning	No preference. Questions the key formatting elements in an eplan context.		Not sure whether different eplan software providers can accommodate one specified style/format/layout.

			Maintenance of eplans from an IT side needs to be considered if the “plan” has to go off line for a few days.
Plain English	Preference to use Plain English	The notified Plan and recommended version from the Independent Hearings Panel had a Plain English review.	No impact. Fully support use of plain English.

**7 Feedback on Discussion Paper F: Plan mapping standards**

**Preferred Approach**

**Approach:**  
 Standardise the visual display of information on maps including colour, symbols, designs, terminology and conventions of mapping.

**Feedback**

- 7.1 The council supports the standardisation of the delivery mechanism, structure and cartographic representation of a plan for the following reasons:
- Ability to easily use and interpret a plan no matter what region of the country you are making an enquiry,
  - A cartographic standard New Zealand wide would provide a live depiction and interrogation of the topographical/geographical/demographic makeup of the country  
 The Auckland Plan is cartographically complex, and it is accepted that other regions may need a simpler palette. If there was an agreed GIS data format, attributes / scheme for zones and overlays etc, there would be the ability to apply an agreed country wide colour scheme for a ‘group zone’ attribute thus allowing councils to use any nuances of that colour that may be specific for them using ‘zone’ SCHEMA,
  - Opportunity to use an agreed software platform for maps and text would be helpful for users of the plan and to minimise expensive information technology development  
 A GIS Viewer has the advantage of being able to integrate with corporate property data, easier to update content and utilise LINZ weekly update service.

- 7.2 However to restructure the Auckland Unitary Plan geospatial data as specified in a planning standard would require change to not just the data but also the Unitary Plan GIS viewer, where there has been substantial costly technical development to produce the added value of a 'Property Report' which is also used for Land Information Memorandums and where there is integration with the text.
- 7.3 The discussion paper has an extensive discussion about online pdf maps which is not a practical option for a Unitary Plan. When the Auckland Unitary Plan was notified in 2013 there was a requirement to produce pdf's as well as a GIS Viewer, this resulted in a map series of over 750 pdf's. The complexity of the cartographic representations required for a Unitary Plan is challenging and the pdf output was soon identified as burdensome. A GIS Viewer, was accepted as the best solution, however the ability to identify which of the over 50 layers of information was relevant to a property was still difficult and it was concluded there was a need to include a property report as part the statutory deliverable.

## 8 Feedback on Discussion Paper G: Definitions

### Preferred Approach

#### Approach:

Standardise definitions for 87 terms as a mandatory requirement as well as standardise formatting and display of definitions.

#### Feedback

- 8.1 The Auckland Unitary Plan contains approximately 52 of the 87 definitions which are proposed to be standardised. The introduction of these standardised definitions will have a high impact on the Auckland Unitary Plan because significant consequential changes to the plan provisions are likely to be required to ensure the integrity of the whole plan is maintained.
- 8.2 The standardising of definitions will also have a high impact on the resource consents department and the ongoing interpretation of plan provisions. The resource consents department may struggle to achieve the outcomes anticipated by the Auckland Unitary Plan if the standardised definitions have not been tested within the context of the plan provisions.

- 8.3 The proposal to format the definitions within a table also has particular issues for the Auckland Unitary Plan as the definitions contain a lot of indenting and bullet points which can be problematic within a table.
- 8.4 Standardising definitions has a potential impact on the heritage management approach in the Auckland Unitary Plan. The discussion paper proposes definitions for alteration, demolition, repairs and maintenance, and modification/minor works.
- 8.5 The Plan’s approach to heritage management is “place based” – this is considered international good practice. This holistic approach involves the identification of an extent of place to which the values, and therefore the rules in the plan, relate. Additionally, the Schedule of Historic Heritage includes a variety of places including archaeological sites, gardens, shipwrecks, maunga, settlements, and streetscapes. This approach requires many terms to be defined differently than a “building” or “items” based approach, as used in other plans. For example, within the Plan demolition is considered as ‘demolition and destruction’ so archaeological sites are also captured. It is noted the discussion paper takes a building/item based approach.
- 8.6 How terms are defined, and the level of detail in this definition, is often driven by the activity status in the plan. The Auckland Unitary Plan identifies demolition greater than 70% of primary feature within a Category A historic heritage place as a prohibited activity. The use of this activity status has required a detailed and precise definition of this activity. The prohibited status gives a clear signal of the great importance of our Category A places to Aucklanders. The use of a lesser activity status, as used in other plans, would not require such detail in the definition.
- 8.7 The full impact of standardising definitions on the integrity of the Auckland Unitary Plan provisions will require an in depth assessment. The table below is a preliminary analysis of the complexity of the Plans definitions which are proposed to be standardised.

	Low Complexity	Medium Complexity	High Complexity
<b>Antenna</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Archaeological site</b>	Under the Plan this term has the same meaning as in Heritage New		

	Zealand Pouhere Taonga Act 2014.		
<b>Boundary adjustment</b>			This defined term relates to an activity. Any amendment to this term will result in consequential amendments to ensure the provisions still function as intended. There have been complex interpretation queries in relation to this definition.
<b>Building</b>			This defined term has a complex definition with inclusions and exclusions. It is used to ensure there is a settled meaning extensively throughout the plan. Any change to this definition would have significant consequential amendments. Resource consents have some issues with the current Plan defined term.
<b>Building coverage</b>			This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function. There have been complex interpretation queries in relation to this definition. Any change to the definition will impact how the provisions are applied changing outcomes on the ground.
<b>Carriage Way</b>	Simple definition with no includes or excludes section.		

<b>Commercial Activity</b>	Simple definition with no includes or excludes section. Links to a nesting table.		
<b>Corner Site</b>	Simple definition with no includes or excludes section.		
<b>Demolition</b>	Simple definition with no includes or excludes section.		
<b>Dripline</b>		This is a technical definition with diagrams. Any simplification of this definition could impact how associated rules function.	
<b>Dwelling</b>			This defined term has a complex definition with inclusions and exclusions. It is used to ensure there is a settled meaning extensively throughout the plan. Any change to this definition would have significant consequential amendments. Resource consents have some issues with the current Plan defined term.
<b>Earthworks</b>			This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function. Any change to this definition will have major implications on how the standards are applied.
<b>Education Activity and/or Facility</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	

<b>Emergency Service</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Front site</b>	Simple definition with no inclusions and exclusions.		
<b>Gross Floor Area</b>			Our definition is very complex and needs to be for the standards to work, particularly within the City Centre.
<b>Ground Level</b>		This definition is specific to the Auckland context with dates that relate to the notification of the Plan. Any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Habitable Room</b>		The definition refers to other defined terms. The impact of any amendments to these other defined will need to be assessed.	
<b>Hazardous Facility</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Healthcare Facility</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Net Site Area</b>		This definition underpins many standards across the Plan. Any amendment to this definition will impact on how rules that rely on this definition function.	

<b>Network Utility</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Noise Sensitive Activity</b>		This definition lists specific activities. Any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Notional Boundary</b>		This definition includes specific dimensions. Any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Office</b>		This defined term relates to an activity. Any amendment to this term will result in consequential amendments to ensure the provisions still function as intended.	
<b>Outdoor Living Space</b>			We would need to make sure the key components of this definition are included as changes to the definition could affect outcomes on the ground.
<b>Rear Site</b>		This definition includes specific dimensions. Any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Service Station</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Sign</b>		This definition has inclusions and exclusions so any amendment to this	

		definition will impact on how rules that rely on this definition function.	
<b>Site</b>			This defined term has a complex definition. It is used to ensure there is a settled meaning extensively throughout the plan. Any change to this definition would have significant consequential amendments.
<b>Supermarket</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Vehicle Crossing</b>	Simple definition with no inclusions and exclusions.		
<b>Visitor Accommodation</b>			We would need to make sure the key components of this definition are included as changes to the definition could affect outcomes on the ground.
<b>Yard</b>		This definition has inclusions and exclusions so any amendment to this definition will impact on how rules that rely on this definition function.	
<b>Community Facility</b>		This definition has an exclusion section so there may be a medium impact on how the rule functions if this definition is amended.	
<b>Height</b>			This defined term has a complex definition with inclusions and exclusions. It is used to ensure there is a settled meaning extensively throughout the plan. Any change to this

			definition would have significant consequential amendments.
<b>Height in Relation to Boundary</b>	Simple definition with no inclusions and exclusions.		
<b>Home Occupation</b>		This definition has inclusions and exclusions so there may be a medium impact on how the rule functions if this definition is amended.	
<b>Minor Dwelling</b>	Simple definition with no inclusions and exclusions.		
<b>Restaurant</b>	Simple definition with no inclusions and exclusions.		
<b>Retail Activity</b>	Simple definition with no inclusions and exclusions		

## 9 Feedback on Discussion Paper H: Electronic functionality and accessibility of plans and policy statements

### Preferred Approach

#### Approach:

Standard to include a minimum functionality, mapping standards, and elements of data and information transfer standards including:

- Searchability and date of last update
- Differentiate between proposed, operative and appealed provisions
- Accessing plan within a set number of clicks from homepage
- All plans and policy statements hosted on a common named area on council website
- Hyperlinking provided

## Feedback

- 9.1 Auckland Unitary Plan currently has text presented as PDF format and a GIS viewer for spatial elements. The Plan text is now being entered into an e-plan and we are waiting decisions on the degree of both the interactive text/maps and planning enquiry. The GIS Viewer returns a list of all information pertinent to the property selected and also identifies spatially any modifications. A link is provided to the list of modifications on the website for added information. There is the ability in Unitary Plan GIS viewer to link to diagrams in the text.
- 9.2 Submission database and management – Online submission forms are available. The legacy database (FSMS) is requiring an upgrade and is currently unusable so we are using Microsoft excel for database submission management.
- 9.3 The following table sets out the level of impact for the Council in the transition to edelivery maturity as set out in the discussion paper.

Factors to be considered	Consequence to P&P	Impact
By 2020+		
Search plan in its entirety and see when information was last updated	Unitary Plan GIS Viewer – geospatial data has workflow management which records update.	Low impact – Can search the whole plan in ePlan format which is being prioritised at the moment.
	Unitary Plan GIS Viewer last updated – exists	Medium impact - Need to commence asap tagging of text [last updated dd/mm/yy]
	Text - ICON e-Plan searchable Plan last updated not within text separate PDF	Unitary Plan GIS Viewer will show where & when there is a plan.
Access plan within x clicks from homepage	2 clicks in from Auckland Council website 1 click to home page then 1 further click to text / maps	No impact – already accessible
Plans and policy statements are hosted on a commonly	Council undergoing web refresh will need to look at	Low impact

Factors to be considered	Consequence to P&P	Impact
named area on council website	having links from UP website to other policy statements / centre and structure plans	
Links provided between various planning provisions	Unitary Plan GIS viewer has been built to link to ICON bookmarking	Medium impact if not done as part of ePlan go live
	<b>Text</b> – Text needs to be in ICON before this linkage work to commence	Development for Unitary Plan GIS viewer and Icon to be integrated as per proposed unitary plan.
Single website portal managed by Ministry for the Environment		
By 2024+		
e-Plan text presented in HTML and full linkages	HTML available once ePlan available If standards on formatting are different to what Auckland Council already delivers this impacts rewriting of the HTML code.	Medium impact
Interactive GIS	Work required to integrate textual and spatial data	Medium impact
Transitioning		
eDelivery – cannot be changed overnight. Systems evolve	Standards to be released in 2018 and depending on how these changes align with ICON / Unitary Plan GIS viewer will affect impact	Could range from No impact to High impact
Available resources	Invested time and money into system to produce ePlan  Land Information Memorandums integrated	

Factors to be considered	Consequence to P&P	Impact
	<p>with Geospatial data</p> <p>How can we make sure eDelivery is cohesive</p> <p>What has New Core / is Resource consents doing</p> <p>Don't want to duplicate work i.e. planning enquiry / consenting made easy</p>	
Priority/demand for planning services	<p>Can current system cope with Auckland growth</p> <p>Need submission management system – looking at this now</p>	
Standardise structure and format of plan - text		High impact
Standardise structure and format of plan - Geomaps		High impact
Costing	<p>Considerable \$ input into UP ePlan already</p> <p>Ability to upgrade Geospatial and text</p>	
Expectations		
e-Planning future considerations		
Online consent applications (submission and tracking)		
Online submissions on plan changes		
Online forms and fee payment for all services	Lodgement for Notices of Requirement and Private Plan Changes unclear	

## 10 Feedback on Discussion Paper I: Metrics (how things are measured)

### Preferred Approach

#### Approach:

Standardised metrics for earthworks, noise, light spill and building bulk and location.

#### Feedback

10.1 The Auckland Unitary Plan has specific measurements and thresholds for all of the identified themes (earthworks, noise, light spill and building bulk and location). There is a significant difference between standardisation of the way a metric is measured and the thresholds relating to that metric. The standardisation of the metrics will require changes across many parts of the Auckland Unitary Plan, and in some cases will require a specialist or consultant to recalculate the thresholds, if necessary.

10.2 An initial assessment of the impact of standardising metrics is provided in the table below.

Metric Theme	Metric used in AUP?	Relevant section of Auckland Unitary Plan	Degree of Change/Implications of Auckland Unitary Plan
Earthworks	Yes – thresholds for area and volume.	E11: Land Disturbance – Regional E12: Land Disturbance – District E38 & E39 Subdivision Various Precincts Chapter F Coastal Definitions	Medium Impact: would have to align all metrics/provisions with NPS standard metrics.  Most provisions should be contained within specified chapters however Precincts may be affected.  There is some benefit in a standardised approach. However recalculation and amendment may be required through many parts of the plan.

Light Spill	Yes - Various lux thresholds.	E24 Lighting  Various Precincts  Definitions	Medium Impact: would have to align all lighting metrics/provisions with National Planning Standards  Most provisions should be contained within specified chapters however Precincts may be affected.  Some benefit to this approach. Would have to consult with lighting expert in terms of amendment or conversion of metrics.  Many thresholds are zone, precinct or overlay specific. Do not consider that a standardised process could provide for site specific scenarios.
Noise	Yes – various thresholds for measurement of noise levels and frequency (dB, LAeq, LAFmax)	E25 Noise and Vibration  Various Precincts  Auckland Wide Rules – Temporary activities  Definitions	Medium Impact: would have to align all noise provisions with NPS.  Most provisions should be contained within specified chapters however Precincts may be affected.  There is some benefit to this approach. Would have to consult with noise expert in terms of amendment or conversion of metrics.
Building bulk and location.	Yes – various thresholds within each of the zones,	Chapter H Residential Zones Open Spaces Zones	Wider scale changes required especially to residential zones.

Including: height, sunlight access, site coverage, setback and outdoor living area	precincts, and definitions.	Business Zones Rural Zones Special Purpose Zones Coastal Zones? Definitions	Consequential changes may also be required, e.g. to definitions. There is some benefit to this approach.
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## 11 Feedback on Discussion Paper J: General provisions

### Preferred Approach

#### Approach:

Standardising location and some content of general provisions

#### Feedback

11.1 The discussion paper does not address a combined plan or state whether additional material will be allowed. A combined plan should have the flexibility to locate its general provisions depending on what plans and/or policy statements are combined. For example, cross boundary provisions, monitoring and articulating Tangata Whenua values in the Auckland Unitary Plan are only located within the Regional Policy Statement.

11.2 The proposed approach identified in the discussion paper has been assessed in the table below. Generally any changes deemed to have a low impact is still likely to require a renumbering of sections in a chapter. This will potentially cause issues for resource consents report writing and ongoing referencing (as well as their templates)

Type of Plan Content	Suggested to remain in the Plan	Auckland Unitary Plan location	Comment – key to impact description under table
User guidance on RMA	No	Chapter A – 1 page	Low impact other than renumbering. However, it removes the context for the plan and if the plan is to refer to national direction then this would be without the “parent”. The Discussion Paper suggests putting it on the website which means it can be adjusted without a plan change. This could possibly work.
Links to other regulatory docs (NPS, NES, RPS)	Yes	Chapter A references other	Low impact. Chapter A in the Plan does not currently identify specific national directions such as the NPS or NES. This

		strategic council docs.	will need to be added. However if council is required to identify the plan provisions that implement the national direction then this could be problematic because of the integration and complexity of the unitary plan. Also this could be legally challenged if not all provisions are identified.
Tangata Whenua values	Yes	Multiple places but mainly in the Regional Policy Statement.	Low impact. The Regional Policy Statement has a discrete section on Mana Whenua values – developed in conjunction with iwi. Any additional or moving content should be done in consultation with iwi.
Guidance on how to use plan and structure	No	Chapter A	Low impact – but disagree as putting this outside of the plan isn't user friendly particularly if information on activity status is still contained in the Plan. This sort of information doesn't normally get changed much and possibly could be done under cl20A of the First Schedule anyway.
How to apply for resource consent	No	N/A	No impact – already been removed from the plan. Agree it should not be in the Plan.
Information requirements for a resource consent	No	Chapter C – 1 page	Low impact other than renumbering. Agree it should not be in the Plan.
Activity status information	Yes, brief	Chapter A	No impact unless it was required to be moved to Chapter C. Also contains plan user guidance for activity tables so contradicts above on user guide.
Notification	Yes	Chapter C	No impact unless it was required to be moved to Chapter A.
Rules that have legal effect	Yes	Missing as Plan now mostly operative.	Low impact – this is only relevant for plan changes now.
Designations	Yes	Separate chapter	No impact
Cross boundary provisions	Yes	RPS	No impact unless it was required to be located elsewhere. Note this is not mandatory (other than for RPS) so inconsistent with general principle of reducing content.
Financial contributions	No	Precinct provision	Low impact. Will need to delete it anyway as per RMA amendments.
Monitoring strategies	No, reference only	RPS	No impact unless it was required to be located elsewhere. Note this is not mandatory (other than for RPS) so inconsistent with general principle of reducing content.