

AUCKLAND UNITARY PLAN
INDEPENDENT HEARINGS PANEL

Te Paepae Kaiwawao Motuhake o te Mahere Kotahitanga o Tāmaki Makaurau

**Procedural Minute No. 5 by Chairperson of
Independent Hearings Panel**

Procedure in Relation to Further Submissions

18 July 2014

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INDEPENDENT HEARINGS PANEL

Te Paepae Kaiwawao Motuhake o te Mahere Kotahitanga o Tāmaki Makaurau

Proposed Auckland Unitary Plan

Procedure in Relation to Further Submissions

Procedural Minute No. 5 by Chairperson of Independent Hearings Panel

Summary

1. The Auckland Council publicly notified its Summary of Decisions Requested (SDR) report in relation to the Proposed Auckland Unitary Plan (**Proposed Plan**) on 11 June 2014. Pursuant to clause 7(c)(1) of Schedule 1 to the RMA as modified by section 123(8) of the Local Government (Auckland Transitional Provisions) Act 2010, the closing date for further submissions is 30 working days after the day on which that public notice is given, which will be on 22 July 2014.
2. Counsel for Herne Bay Residents Association Incorporated (Submitter #3635) has applied to the Panel seeking an opportunity for a judicial conference to explore opportunities to overcome the difficulties that are addressed in his memorandum dated 9 July 2014 (copy **attached**).
3. To assist in resolving any perceived difficulties, the Panel confirms, in terms of paragraph 15 of that memorandum, that a primary submitter is entitled to be heard on any submission that challenges the relief sought in the primary submission whether that primary submitter has lodged a further submission on that other submission or not.
4. To consider other action that may need to be taken, the Chairperson of the Independent Hearings Panel directs that a conference be held by the Panel in Hearing Room 1, Level 16, Tower One, 205 Queen Street at **2 pm on Friday 1 August 2014** to consider these matters and that the Herne Bay Residents Association Incorporated and the Auckland Council are directed to attend.
5. The other persons served with this minute are invited to attend the conference and are to advise the Panel in writing by **5pm on Monday 28 July 2014**:
 - a. whether they wish to attend the conference;
 - b. whether they seek to raise any matter relating to the procedure for further submissions in addition to those raised by Counsel for Herne Bay Residents Association Incorporated; and
 - c. if they do wish to raise any additional matter, to provide particulars of any specific suggested action that they wish the Panel to consider taking.

Grounds for Application

6. Paul Cavanagh QC, counsel for the Herne Bay Residents Association Incorporated (Submitter #3635), relevantly submits:
 - i. The number of primary submissions on the Proposed Plan creates an unforeseen level of complexity.

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- ii. The Auckland Council's own submission (Submitter #5716) is so large that it raises an inference that the Proposed Plan is inchoate and that the decision to notify it was premature.
- iii. It may be necessary to determine whether the Council's submission should proceed by way of a variation.
- iv. Submitters who based their submissions on the proposed Plan as notified have a reduced opportunity to consider the significant changes sought by the Council's submission and potentially face an unfair outcome as a result of the difficulty in ascertaining the impact of that submission.
- v. The task of dealing with the Council website to establish in what circumstances a further submission may be warranted is cumbersome and unwieldy, resulting in an irrebuttable presumption that nothing worthwhile can be established by the closing date for further submissions.
- vi. People without access to computers or the skills to use a computer face greater difficulties.
- vii. Jurisdictional issues may arise in relation to attempts to exclude persons from participation in major issues because they have not lodged a further submission.
- viii. The sheer number and complexity of the submissions on the Proposed Plan, some of which are very complex, and the formal requirements for further submissions, mean it will be necessary that an intending further submitter has to deal with a significant volume of material to determine what further submission should be made.
- ix. This may not be necessary if it is accepted that a primary submitter is entitled to be heard on any submission that challenges the relief sought in the primary submission.
- x. These concerns justify early consideration of the process to be followed to ensure fair treatment and a full opportunity to be heard in an efficient process.
- xi. Suggested action which could be taken includes:
 - a. Engagement of an independent IT expert and an experienced planner to evaluate the degree of difficulty in dealing with the Council website and identify improvements to access to ensure that the rights of potential further submitters are not unduly compromised;
 - b. Review of the submissions to ascertain key issues that can be the focus for initial mediation;

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- c. Confirmation that the process should not be inhibited by potential for jurisdictional challenges to the right of any affected person to be involved in mediations or hearings;
- d. Appointment of process advisors to assist the public in understanding the process, as has been done in recent consent application processes.

Procedural Point

- 7. On a preliminary point of procedure, the application was not commenced properly. The memorandum on behalf of the Herne Bay Residents Association Incorporated is addressed to both the Panel and the Auckland Council. It was received by the Panel on 9 July 2014 via e-mail, which is an appropriate method for lodging material with the Panel. I am advised however that notwithstanding the fact that the application is addressed to the Council, it was not delivered to it and that it only came to the Council's attention via one of the lawyers to whom Mr Cavanagh had provided a copy.
- 8. It therefore appears that the application was not served on a directly affected party. It would normally follow that the application should not be considered until service has occurred and the persons served have had adequate opportunity to consider and respond to the application. I am forced to make an exception in this case.
- 9. It is essential that any party who makes any form of application to the Panel serves a copy of that application on those persons who are directly affected by it. That would likely include in most (if not all) cases the Auckland Council. The Panel and its staff cannot be expected to act as the agents for submitters in relation to applications of this kind.
- 10. In the present case I have made sure that the Council is aware of the Panel's procedure in dealing with the application and explained why I will not require formal service on this occasion. I have done this because time is short and the issue raised in the application needs to be dealt with as expeditiously as possible. All submitters and all professional advisors assisting submitters should from now on take care to ensure that any application to the Panel is properly served on affected persons.

Discussion

- 11. The Panel acknowledges that the large number of submissions, involving a larger number of points of submission, entails a high level of complexity in dealing with the process for hearing submissions on the Proposed Plan. This has been foreseen and is unavoidable. As a preliminary comment on which parties might wish to reflect, the Panel considers that the sheer number of points of submission is not the real problem. When one reviews the points of submission according to the issues raised in terms of the themes, topics and sub-topics into which the Summary of Decisions Requested pivot table has been organised, one can see that the issues to be addressed are not as staggering as the overall total number of submission points might suggest.

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12. At this stage the real complexity arises in dealing with a fully unitary planning document, where the inter-relationships of regional policy and regional and district planning issues all having to be dealt with at once. But that is a matter that is the subject of clear statutory requirements which we cannot alter by any procedural direction.
13. The Panel wishes to draw attention to the method of using the coding framework for submissions to navigate and understand the Summary of Decisions Requested. As well as the large pivot table (in .xls format) containing the entire summary, the Summary of Decisions Requested is also available on the Council website as series of separate documents (in .pdf format) based on the coding framework. These documents are available by topic or sub-topic (as applicable) and are searchable. The topics and sub-topics indicate the part of the Proposed Plan and the plan provision reference number (where relevant) that the summary relates to. The Council website also has a reader's guide to using the Summary of Decisions Requested. The Panel recommends that all persons using the Summary of Decisions Requested or advising people in relation to its contents consider the contents of that guide carefully.
14. The size of the Council's submission does raise a number of questions. At this stage that submission stands in no different position to any other submission (unlike the position that it would have were it to be the content of a variation to the Proposed Plan). The Panel expects to consider it on the same basis as other submissions and in light of any further submissions (whether general or specific) that may be made in relation to it.
15. From the very limited preliminary consideration of the Council's submission that we have undertaken, it appears to consist in the main of a large number of amendments to the detail of the Proposed Plan, mostly at a site specific level, rather than changes to objectives, policies or general rules. If that description is accurate then the key issues in dealing with the Council's submission would appear to be:
 - a. the facility that any person may have to identify and locate any detailed submission which affects them directly; and
 - b. whether the time limit for lodging further submissions reduces that facility.
16. In regard to the first issue, we are advised that the Council sent letters to owners of properties affected by a proposed spatial change such as a change in zoning or altering an overlay or precinct provision and to properties affected by the section of the Council's submission dealing with the views of Local Boards. In terms of the ability of other persons with specific interests who wish to track down and understand the effect of the Council's submission, we note that as well as being summarised in the Summary of Decisions Requested report and therefore searchable by means of the pivot table, the Council's submission is available online in sections corresponding to the coding framework for submissions with searchable tables (in .pdf format) to assist persons in dealing with the Council's submissions in relation to those interests.
17. In regard to the second issue, in response to the postulate in paragraph 15 of the memorandum of counsel dated 9 July 2014 and in relation to all primary submissions, the Panel confirms that that a primary submitter is entitled to be

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heard on any submission that challenges the relief sought in the primary submission whether that primary submitter has lodged a further submission on that other submission or not. If necessary (and the Panel is not sure that it is required), the basis for such a hearing can be a waiver of the time for lodging a further submission pursuant to section 165(c) of the Local Government (Auckland Transitional Provisions) Act 2010.

18. Further, the Panel wishes to draw attention to its intention to produce “parties and issues” reports (as set out in detail on its website at <http://www.aupihp.govt.nz/procedures/>) which are intended to gather in a single document references to all relevant submissions affecting a hearing topic in terms of the coding framework for the Proposed Plan. The Panel hopes that these parties and issues reports will facilitate the comprehensive understanding of all submissions relating to each topic for which such a report is prepared.
19. This material is intended to supplement the material already available on the Council’s website in relation to the Summary of Decisions Requested.
20. At this stage, and without prejudice to any decisions that may be made at the conference which the Panel will convene in response to the request by counsel, we would offer the following comments on the suggested actions in paragraph 18 of counsel’s memorandum:
 - a. We doubt that either we or other submitters would gain much benefit from the engagement of an independent IT expert and an experienced planner to evaluate the degree of difficulty in dealing with the Council website. The designers of the website appear to have assumed that users will have a moderate level of facility with computers, which may be consistent with the nature of the intended audience. Submitters or other people without any access to computers or who lack the skills needed to manipulate information on computers will require special assistance which the Council or, if necessary, the Panel may provide. Leaving the issue of scale aside (which no amount of technical commentary will reduce) the material on the website is arranged in a way that enables a submitter with particular interests to locate other relevant submissions at the levels of theme, topic and sub-topic in the coding framework. If that is insufficient to ensure that the rights of potential further submitters are not unduly compromised, then our direction that a primary submitter is entitled to be heard on any submission that challenges the relief sought in the primary submission should do so.
 - b. The Panel and its staff are reviewing the submissions to ascertain key issues that can be the focus for initial mediation and will be convening pre-hearing meetings to arrange for conferencing of experts (where applicable) and mediation.
 - c. Our direction that a primary submitter is entitled to be heard on any submission that challenges the relief sought in the primary submission should be sufficient confirmation that the process will not be inhibited by potential for jurisdictional challenges to the right of any affected person to be involved in mediations or hearings.

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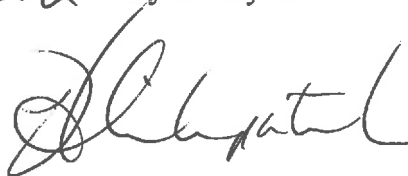
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- d. The Panel has engaged 15 experienced and respected practitioners in a range of disciplines to be facilitators of expert conferences and mediators. We have considered the possibility of also engaging process advisors to assist the public in understanding the process, as has been done in recent consent application processes, but do not consider that to be appropriate in the context of a plan review process or necessary in light of the availability of the facilitators and mediators who may, as part of their roles assisting the Panel in the identification and resolution of issues, provide incidental assistance to submitters who lack experience in these processes.

Directions

21. A primary submitter is entitled to be heard on any submission that challenges the relief sought in the primary submission, whether that primary submitter has lodged a further submission on that other submission or not.
22. To consider any other action that may need to be taken to assist in enabling submitters to make further submissions adequately and appropriately, a conference will be held by the Panel in Hearing Room 1, Level 16, Tower One, 205 Queen Street at **2 pm on Friday 1 August 2014**.
23. The conference will be a pre-hearing meeting for the purposes of sections 131 and 132 of the Local Government (Auckland Transitional Provisions) Act 2010.
24. The Herne Bay Residents Association Incorporated and the Auckland Council are directed to attend the conference.
25. The other persons served with this minute (being persons on whom counsel for the Herne Bay Residents Association Incorporated served his memorandum and other Auckland-based lawyers specialising in resource management) are invited to attend the conference and must advise the Panel in writing by **5pm on Monday 28 July 2014**:
 - a. whether they wish to attend the conference;
 - b. whether they will seek to raise any matter relating to the procedure for further submissions in addition to those raised by Counsel for Herne Bay Residents Association Incorporated;
 - c. if they do wish to raise any additional matter, to provide particulars of any specific suggested action that they wish the Panel to consider taking.

Dated at Auckland this 18th day of July 2014.



David Kirkpatrick
Chairperson, Hearings Panel for
proposed Auckland Unitary Plan

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To: Paul Cavanagh QC as counsel for Herne Bay Residents Association
Incorporated

And to: Auckland Council

And to those persons served by the applicant:

Matthew Casey QC	< matt@casey.co.nz >,
Russell Bartlett QC	< bartlett@shortlandchambers.co.nz >,
Douglas Allan	< Dallan@ellisgould.co.nz >,
Asher Davidson	< asher@casey.co.nz >,
Gerald Lanning	< Gerald.Lanning@simpsongrierson.com >,
Malcolm MacLean	< malcolm.maclean@glaister.co.nz >,
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Brandon Watts	< Brandon.Watts@meredithconnell.co.nz >,
Brian Putt	< brian@metroplanning.co.nz >

And to other Auckland-based lawyers specialising in resource management:

Helen Andrews	Chancery Green
Heather Ash	Simpson Grierson
Helen Atkins	Atkins Holm Majurey
Marija Batistich	Bell Gully
Simon Berry	Berry Simons
Richard Brabant	Barrister
Jeremy Brabant	Barrister
Paula Brosnahan	Chapman Tripp
Anne Buchanan	DLA Phillips Fox
John Burns	Carter Kirkland Morrison
Jennifer Caldwell	Buddle Findlay
Janette Campbell	Meredith Connell
Bronwyn Carruthers	Russell McVeagh
Gillian Chappell	Barrister
Daniel Clay	Minter Ellison
Ian Cowper	Meredith Connell
Rachel Devine	Minter Ellison
Melinda Dickey	Brookfields
Alan Dormer	Barrister
Robert Enright	Barrister
Andrew Green	Brookfields
Mike Holm	Atkins Holm Majurey
Suzanne Janissen	Chapman Tripp
Claire Kirman	Ellis Gould
Kitt Littlejohn	Banister
Bill Loutit	Simpson Grierson

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Padraig McNamara

Paul Majurey

Bal Matheson

Patrick Mulligan

Linda O'Reilly

Karen Price

Vernon Rive

Stuart Ryan

Catherine Somerville

Alan Webb

Jason Welsh

John Young

Simpson Grierson

Atkins Holm Majurey

Russell McVeagh

Buddle Findlay

Brookfields

Chancery Green

Barrister

Barrister

Chapman Tripp

Barrister

Chancery Green

Brookfields

IN THE MATTER: Of the Resource Management Act 1991

AND

In the matter of the Local Government (Auckland Transitional Provisions) Act 2013

AND

In the matter of the Proposed Auckland Unitary plan and procedures established under relevant legislation to address the submissions and further submissions processes in relation to that plan following notification of it by the Auckland Council

To the Auckland Unitary Plan Independent Hearings Panel (The Panel)

AND TO

The Auckland Council

Memorandum of Counsel for Herne bay Residents Association Incorporated, a submitter to the Proposed Auckland Unitary Plan (PAUP) and the further submitters referred to in the schedule to this memorandum.

May it please the Panel,

1. Counsel submits that the overwhelming raft of primary submissions that have been made in relation to the PAUP has created a level of complexity that those responsible for the drafting of relevant legislations had clearly not foreseen.
2. The Auckland Council (AC) has conceded that there have been approximately 9,400 primary submissions which on analysis of them, individually disclosed that there are approximately 93,600 unique requests which seek changes to the notified plan.
3. AC itself, has made a massive submission to its own plan, embracing 5,000 pages of text and maps which are contained within 8 ½ Eastlight folders of material. This is larger than many of the constituent district plans in their entirety. This material has been presented in a form that is difficult to systematically integrate with the notified PAUP. The fact that the Council felt the need to introduce such a multiplicity of changes to the notified version of the plan, it is submitted raises an inevitable inference that the decision to notify this inchoate document was both premature and unwise. Questions that could be raised may eventually have be put to the panel when the AC submission is reviewed by it. It may be necessary to determine whether AC should have elected instead to proceed with a variation to its plan. Certainly

if the panel finds that significant changes to the PAUP are contemplated, resulting from the AC submission this process will then have to be reviewed against the background of reduced opportunity available for further submissions to the plan, a qualification that does not apply to the plan when it was originally notified or in relation to consideration of any variation subsequently made to it.

It is accepted that section 124 & 125 Local Government (Auckland transitional provisions) amended Act 2013 specify the only ways of which the Auckland combined plan may be amended or varied before Auckland Council publicly notifies its decisions on the recommendations of the hearing panel under section 148 (h)(a).

However, a real concern regarding the AC submission relates to its size and complexity and the potential for an unfair outcome arising from the fact that many submitters had based their primary submissions on the document as notified and now face the difficult task of ascertaining the impact of this submission on it.

4. However, it is the cumbersome unwieldy task inflicted upon those interpreting the AC website in any endeavour to establish where and in what circumstances a further submission is warranted, that creates an imponderable problem. The staggering task faced in any attempt to review the many submissions that have been lodged with AC raises as an irrebuttable presumption that nothing worthwhile can be established in the limited time available for the lodgement of further submissions to the plan.
5. If professional advisers, lawyers and planners face this difficulty what is the position of an affected submitter who is unable to access the plan via the AC website. This could be because he or she lacks computer equipment or the skills to enable this to be done.
6. A real concern arises with the prospect of future debates over jurisdictional issues, involving attempts to exclude persons from participation in major issues likely to arise once an initial mediation process commences, it is assumed sometime next year. The Council appears to have presented its public with a hurdle that cannot be overcome.
7. In filing this memorandum Counsel does not claim the expertise that other qualified individuals will have to enable a responsible analysis of difficulties faced with any attempt to effectively analyse the submissions received so that the panel can be confident that all issues of concern have been adequately addressed.
8. Put simply, begin the task of reviewing the submissions to assess whether or not any should be opposed or supported, the search can be undertaken either by "submitter" or by "theme". If we take the example of residential zones, taking the theme option and just the mixed housing suburban/urban residential zone, there are nine separate sections. One of these – development controls alone has attracted just under 1500 submissions and it is likely that similar numbers apply to all nine sections involving, it is estimated a review of roughly 13,500 + pages of text.

9. Submitters are therefore faced with an impossible task requiring them to respond to the sheer number and complexity of submissions on the plan. There is a risk that if they wish to respond with any confidence that they will be heard, there is at least a significant risk that that may not occur because they will be excluded not having filed a relevant further submission.
10. What we are dealing with in relation to the PAUP is a model that simply cannot work when its applied to a Super City the size of the Auckland region. The attempt to mould nine plans into one to expect that this could be accomplished with little difficulty is to say the least naive.
11. There are just under 50 sections to the PAUP covering everything from sustainable development through to designations, future urban industrial and residential zones, so at this stage one can only guess at the size and volume of written material that has to be encountered.
12. Difficulties highlighted in this memorandum are readily apparent from a perusal of Form 3 (further submissions in support of, or in opposition 2, submission on proposed Auckland combined plan or on variation to proposed Auckland combined plan)) SS 123 & 125 Local Government (Auckland transitional provisions) Act 2010, clause 8 of Schedule, Reserve Management Act 1991.
13. This form follows the wording set out in Form 6, Resource Management (forms, fees and procedure) regulations 2003. Paragraphs 3, 4 & 5 in this form are apposite. In summary they require a further submitter to refer to a specific submission and submission number (if available); the particular part or parts of the submission supported or approved and specified the reasons for support or opposition.
14. It is therefore necessary that the further submitter is able to demonstrate a careful understanding of the detail of the submission that is to be the subject of a further submission to justify any involvement in the process. Counsel is aware that there are a number of very complex submissions that will have to be carefully reviewed to determine what response should be made.
15. This may not be necessary if it is accepted that a primary submitter is entitled to be heard on any submission that challenges the relief sought in his or her primary submission.
16. It is therefore submitted that the nature of the concerns that have been expressed in this memorandum if widely supported justifies early consideration by the panel of the process to be followed now, to ensure that all participants are treated fairly and have full opportunity to be heard, albeit that the panel will be properly concerned to adopt a process that is efficient with all participants obliged to demonstrate a willingness to cooperate in achieving that outcome.
17. It is conceded that the implementation of the Auckland Unitary Plan involves a matter of significant public interest. It is therefore imperative that Counsel seek to work with the panel to establish a procedure that will support the process and not seek to embark upon the destructive path of criticism and rejection. The following are.

Suggested Action Which Could Be Taken

18.

- That the panel engage both an independent IT expert and an experienced planner to advise the panel by evaluating the degree of difficulty faced by persons endeavouring to interrogate the AC website to establish whether they need to submit a further submission to AC. If the criticism that Counsel has made of the existing processes is sustained, can these experts suggest any improvement to access to a degree whereby the panel can be assured that having regard to the principle of fairness the rights of individual potential adversely affected individuals and potential further submitters are not unduly compromised
- That the panel explore the possibility for AC to review the submissions received in an endeavour to ascertain whether there are key issues that are evident on this analysis that can be the focus for an initial process of mediation
- That the panel confirm that this important process should not be inhibited by any potential for jurisdictional challenges to the right of any affected person to be fully involved in any mediation or hearing process
- That the panel appoint process advisors who can assist members of the public to achieve an appropriate understanding of the process that they may wish to engage in, in relation to mediation and hearings regarding submissions. The precedent for this step is appointments made by Board of Inquiry addressing the NZTA Waterview connection appeals and the Environment Court's response to a direct referral involving the proposed Matiatia Marina project at Waheke.

Counsel therefore requests an opportunity for a judicial conference conducted by the panel to explore opportunities to overcome the difficulties that have been addressed in this memorandum.



Paul Cavanagh QC
9 July 2014

*Supporting Submissions**Dillon Interests*

1. Johns Creek Holdings Limited: Jack Hawken Lane
2. Rahopara Farms Limited, SH16 Limited, Dillon Sawmilling Limited, Forest Habitats Limited, Rauhori Forests Limited, Monowai Properties Limited, Karepiro Investments, M Sullivan and M A Nelson: Silverdale West, Rahopara Farms Limited and Cabra Rural Developments Limited: 1502 Weranui Road

Nakhle Interests

1. D E Nakhle Investment Trust, Senior Tour Limited & Windross Investment Trust: Ardmore/Takanini
2. Karaka Estate Limited & Kingseat Farms Limited (Puhitahi): Kingseat
3. Bianconi Investments Limited: Oruarangi Road, Mangere
4. Byerley Park Limited and Karaka Estates Limited: Byerley Park, Karaka
5. Cazadora Holdings Limited: 49-71 Mill Road and 275 Hill Road
6. Dalkara GP Limited (Te Mahia Village): Takanini
7. D E Nakhle Investment Trust: 166 Porchester Road
8. Darley Investments Limited and Carhart Investments Limited: 881 & 899 Papakura/Clevedon Road, Papakura
9. Nakhle Investment Partnership: 310 Mill Road, Papakura

Ellett Interests

1. Ernest Ellett Ryegrass Trust, T R Ellett, Scoria Sales Limited and Johnson Trust Quarry: Ihumatao Road Properties and Maungataketake



Paul Cavanagh QC
9 July 2014

