

15 June 2015

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By email: Phill.Reid@aupihp.govt.nz

Dear Phill

REZONING AND PRECINCTS – AUCKLAND COUNCIL RESPONSE TO DIRECTIONS SET OUT IN PROCEDURAL MINUTE NO. 6 AND IHP CONFERENCE OUTCOMES REPORT DATED 24 MARCH 2015

Background

1. On 24 March 2015 the Independent Hearings Panel (**Panel**) held a meeting (the **meeting**) in relation to the rezoning and precinct topics and, in particular, the directions contained in Procedural Minutes No. 6 (dated 5 August 2014) and No. 7 (dated 29 August 2014).
2. The notification letter sent by the Panel in advance of the meeting, dated 6 March 2015, advised that the meeting would “focus on process matters for overall programme management and scheduling”. The Auckland Council (**Council**) attended the conference in accordance with the Panel’s directions.
3. Following the meeting the Panel issued an IHP Conference Outcome Report, dated 24 March 2015 (**Outcome Report**), which recorded: the purpose of the meeting, aspects of the Council’s presentation, the Panel’s response to the Council’s presentation and presentations from other parties. The Outcome Report also directed (at section 7) the Council to provide further analysis by 15 June 2015 on the following matters:
 - a. Identify the ‘thematic groups’ with the related rezoning submission points and the precinct submission points that can go to hearings prior to the completion of the hearing topics for zone provisions.
 - b. Finalise and identify the submission points requesting ‘new precincts’.
 - c. Identify those rezoning and precinct submission points that can proceed together.
 - d. Identify the rezoning and precinct submission points that are errors and can be completed on the papers.
 - e. Identify the rezoning and precinct submission points that could benefit from direct discussion.

- f. Identify the major submitters that could benefit from prehearing meetings to clarify their concerns and to hear from related further submitters.
 - g. The extent of direct discussion and mediation required to progress both rezoning and precinct submission points.
 - h. Estimates of the likely mediation and hearing time for both rezoning and precincts.
4. This letter responds to the Panel's directions set out in the Outcome Report, and provides the information sought by the Panel in paragraphs 19(ii), (iii), (iv) and (v) of Procedural Minute No. 6.

Summary of information provided

5. The following matters are addressed in this letter:
- a. A proposal to restructure the existing precinct and rezoning topics, to create new topics (and sub-topics), and to enable related rezoning and precinct matters to be heard together [responding to the Panel's directions set out at paragraphs 2(a) and (c) of this letter];
 - b. A proposed rezoning and precinct hearing programme, which discusses the proposed sequencing of topics [responding to the Panel's directions set out at paragraphs 2(a) and (c) of this letter];
 - c. The identification of themes (thematic groups) within the proposed new rezoning and precinct topics [responding to the Panel's direction set out at paragraph 2(a) of this letter];
 - d. The identification of submission points seeking new precincts within the proposed new rezoning and precinct topics [responding to the Panel's direction set out at paragraph 2(b) of this letter];
 - e. The Council's estimates of mediation and hearing days for the proposed new rezoning and precinct topics, including the assumptions relied on [responding to the Panel's directions set out at paragraphs 2(g) and (h) of this letter];
 - f. The Council's estimates of time required for pre-hearing meetings [responding to the Panel's directions set out at paragraphs 2(e), (g) and (h) of this letter];
 - g. The identification of the major submitters that could benefit from prehearing meetings to clarify their concerns/issues, and hearing from related further submitters [responding to the Panel's direction set out at paragraph 2(f) of this letter];
 - h. A suggested alternative approach for the exchange of evidence for the proposed new rezoning and precinct topic hearings; and
 - i. Key questions and directions sought from the Panel in relation to the proposed new rezoning and precinct topics.
6. In relation to the rezoning and precinct submission points that are identified as errors and which can be completed on the papers (as per the Panel's direction at paragraph 2(d) of this letter), the Council is undertaking further investigation into these submission points and will provide this information to the Panel by Monday, 31 August 2015.

A. Proposed restructure of the existing rezoning and precinct topics

7. After having reviewed the submissions made on rezonings and precincts, the Council proposes that the existing precinct topics (Topics 69-73) and rezoning topics (Topics 66-68) are replaced with new topics (and sub-topics) to enable related rezoning and precinct matters to be heard together. A copy of the Council's proposed hearing topic structure for the rezoning and precinct submissions is provided as **Attachment 1**.
8. The Council considers that there are benefits and efficiencies gained in bringing the submissions within the rezoning and precinct topics together under the proposed hearing topic structure. The change will allow the Panel and the Council to consider submissions, on both rezoning and precincts, within their related geographic and/or theme or zone-based topic together. The Council considers that the change will provide efficiencies by hearing submitters that have made submissions on both topics, within a geographic and/or theme or zone based topic, together and that it will see an overall reduction in hearing time.
9. The Council proposes that the existing rezoning and precinct topics are replaced with the following hearing topics, as explained in more detail below:
 - Auckland-wide Topic;
 - Auckland-wide Theme-Based Topics;
 - Specific Zone-Based Topics; and
 - Geographical Topics (combined precinct and rezoning).

Auckland-wide Topic

10. The Council respectfully suggests that out of all the rezoning and precinct hearing topics, this topic be heard first by the full Panel, and that the Council provides an overview of its approach to the rezoning and precincts topics. The Council respectfully suggests that the submission points that have Auckland-wide application could be considered at this hearing (e.g. where a submitter is seeking to up-zone all land adjoining key arterial roads across the Auckland region).

Auckland-wide Theme-Based Topics

11. The Council has identified four Auckland-wide Theme-Based topics, where the Council considers that submission points can be grouped, regardless of geographical location. These theme-based topics contain submission points which seek to change the zoning of land that is also subject to overlays. This has a direct impact on the form of development and activities that can occur in the underlying zone. These topics do not contain submission points that relate to the purpose or provisions of the relevant overlay.
12. The four proposed Auckland-wide Theme-Based Topics are:
 - Volcanic Viewshaft Height Sensitive Areas;
 - Electricity Transmission Corridor;
 - Special Character; and
 - Flooding.

Specific Zone-Based Topics

13. The Council considers that submissions on the following rezoning and precinct topics are discrete enough that they can be considered together under their respective proposed zones. The proposed Specific Zone-Based Topics are:
- Public Open Space (which contain five notified zones);
 - Coastal (which contain seven notified zones); and
 - Special Purpose Zones (which contain 11 notified zones and submissions seeking new special purpose zones).

Geographical Topics

14. Finally, the Council respectfully suggests that the majority of submission points which relate to rezoning and precincts be allocated to new Geographical Topics. Within each Geographical Topic, it is proposed that submission points will be grouped into local areas based on their spatial context, themes and issues.
15. The Council suggests that submission points on existing precincts and any requests for new precincts be heard in the Topic to which they geographically relate, or be heard in the specific zone-based Topic to which they relate.
16. The Council considers that the geographical approach will deliver the following advantages:
- Hearing sessions could potentially be based in the location to which the Topic relates, rather than at the Panel's city centre hearing rooms, enabling submitters to attend hearings that address their local area;
 - There is likely to be a greater submitter turnout when hearings are locally-based in their geographic area;
 - Allows local context to be addressed whilst being cognisant of Auckland-wide zoning and precinct issues and themes; and
 - Allows both rezoning and precinct issues to be heard together in the local area, minimising the number of hearing days a submitter needs to attend.
17. The Council has attached maps that show the spatial boundaries of the proposed Geographical Topics as **Attachment 2** to this letter.

B. Proposed Rezoning and Precinct Hearing Programme

18. The Council respectfully suggests that the rezoning and precinct topics should be sequenced so that the hearing topics follow the following order (as discussed further in paragraphs 19-22 of this letter):
- Auckland-wide Topic;
 - Auckland-wide Theme-Based Topics (with the exception of Special Character for the reasons outlined below);
 - Specific Zone-Based Topics, and
 - Geographical Topics.
19. The Council respectfully suggests that the Auckland-wide, Auckland-wide Theme-Based and Specific Zone-Based Topics could be heard in late 2015, followed by the

Geographical Topics in early 2016. The Council considers that there is the potential for the theme-based and specific zone-based topics to be heard simultaneously, as there is minimal duplication of submitters/submissions between these topics.

20. The Council respectfully suggests that the Special Character (Auckland-wide Theme-Based Topic) is heard after the completion of the Topic 079 - Special Character hearings. Submissions identified in this topic are reliant on the evidence presented, and hearing discussion, for Topic 079.
21. As stated in previous correspondence to the Panel, and at the 24 March 2015 meeting, the Council considers that the Specific Zone-Based topics such as Public Open Space, Coastal and Special Purpose Zones can be heard in advance of the Geographical Topics in late 2015.
22. The Council considers that there is potential for a number of the Geographical Topics to be heard simultaneously, although the Council acknowledges that multiple hearings may create resourcing issues for parties in terms of their legal representation and expert witnesses.
23. The Council has attached to this letter, as **Attachment 3**, the following information for each of its proposed new rezoning and precinct hearing topics:
 - Total number of submission points;
 - Number of primary submitters;
 - Number of major submitters (definition of 'major submitter' is described in paragraph 29(e) below);
 - Number of primary submitters who wish to be heard;
 - Number of further submitters;
 - Number of further submitters who wish to be heard;
 - Complex submission points and submitters (definition of 'complex' is described in paragraph 29(g) below);
 - Number of submission points seeking to retain the Proposed Auckland Unitary Plan (**PAUP**) zoning for a property (or properties) that are not challenged/opposed by another submission; and
 - The list of existing precincts and requests for new precincts that sit within each topic.

C. Identification of themes (thematic groups)

24. The Council has also identified a range of themes throughout the various submissions, which impacts on the allocation of submission points to the relevant topics above. This only applies to rezoning submissions. A list of the themes and theme descriptions is set out in **Attachment 4** to this letter.
25. Four themes in the list provided in **Attachment 4** have been grouped under the Auckland-wide Theme-Based Topics (which are discussed further in paragraphs 11 and 12 above).
26. The remaining themes identified go into more detail than the previously identified themes of: (a) general upzoning; (b) general downzoning; (c) amend notified zoning; and (d) retain notified zoning. These themes are associated with either a specific zone or relief sought, and will be addressed within each geographical based topic.

27. The Council considers that the themes identified in **Attachment 4** will provide a useful basis against which to structure the Council's overarching evidence and report in the Auckland-wide Topic, and that the identified themes will further to assist with the subsequent Geographical Topics.

D. Identification of submission points seeking new precincts

28. Submission points requesting new precincts were originally coded to a general category: 'new precinct request'. The Council has now completed categorising these requests by identifying the area they relate to and the hearing topic that they should be heard under. This information is attached to this letter at **Attachment 5**.

E. Estimates of mediation and hearing days for the proposed new rezoning and precinct topics, including the assumptions relied on

29. The Council has made the following assumptions in estimating the days required for pre-hearing meetings, mediations and hearings:

Programming and submitter numbers

- a. Programming is based on those submitters who indicated in their submission that they "wish to be heard" and/or who indicated that "if others make a similar submission, I will consider presenting a joint case with them at a hearing".
- b. Based on this, the Council has developed three scenarios of attendance at an 80%, 60% and 50% turn-out of primary submitters at hearings. The Council considers that submitter attendance may be higher at the rezoning and precinct hearings than previous PAUP hearings as these hearings are about private property, submitters homes, the potential to subdivide and/or develop, and neighbourhood communities. The Council recognises that pre-hearing meetings or mediation could result in issues being narrowed and/or resolved, which may reduce the hearing time required.
- c. Programming has also taken into account further submitters wishing to be heard and their likely attendance. The Council estimates a 20% attendance by further submitters who are not primary submitters within a topic. The 20% attendance has been added to each scenario to give a total estimate of hearing time per topic.
- d. The number of submitters is adjusted by removing duplication of rezoning and precinct submitters within a hearing topic.

Major Submitters

- e. The Council has identified 75 submitters, out of the approximately 2000 submitters on rezoning and precincts, who are considered 'major submitters'. This list is not exclusive but recognises submitters who:
 - o Have made submissions in all three existing topics (Rural Urban Boundary, Rezoning and Precinct Topics), or
 - o Have landholdings throughout Auckland, or
 - o Are a landowner who owns large areas of land or land that is in strategic locations, or
 - o Are a submitter that has submitted in multiple geographical areas and/or on multiple precincts (both existing and new).

- f. The list of major submitters identified by the Council is attached to this letter at **Attachment 6**.
- g. The Council considers that submitter participation is likely to be higher where the submitter is defined as “major” or the matters raised by submissions are complex. Complex is defined by the relief sought from the submitter and/or level of supporting information provided in the submission.
- h. In most hearing topics, major submitters have made a primary submission on rezoning and existing or new precincts, and have also made further submissions in relation to the submissions of others. It is anticipated that major submitters will wish to participate more than other submitters. Given the complexity of their submission points, they may require additional time to present their case.
- i. Based on this, the Council estimates that major submitters will require an average of 30 minutes to present their case, and estimates that up to 2 hours will be required for a submitter where they have complex submissions or a large amount of submission points in a topic.
- j. Housing New Zealand Corporation (**Housing NZ**) has been identified by the Council as a major submitter, given that their nearly 9000 submission points seek changes to the zoning (and in some cases the introduction of new precincts) on properties throughout the Auckland Region. The Council anticipates that Housing NZ will have the opportunity to present its case on a particular geographical or theme-based topic along with general submitters who have also submitted in that geographical or theme-based topic.
- k. The Council also anticipates that Housing NZ will have the opportunity to present their overall case on rezoning and precincts at the Auckland-Wide Topic hearing.
- l. There are a large number of further submitters in relation to Housing NZ's submission. The Council anticipates a 20% attendance of these further submitters in each hearing topic.

General Submitters

- m. The Council has anticipated that general submitters will receive the same 10 minute allocation that has applied to submitters to date on other PAUP hearing topics. All submitters have the option of applying for additional speaking time.
- n. It is anticipated that some community groups will seek more than 10 minutes, so a buffer of half a day has been added to each topic to factor in such requests.

Precincts

- o. The Council anticipates that all submitters for complex precincts will seek additional time, so an additional 10 minutes per submitter has been allocated where the submission relates to a complex precinct.

Programme and process

- p. It is anticipated that complex, comprehensive and contentious submissions on precincts will trigger greater participation and require additional time. The Council has factored additional time into each hearing topic to address such submissions.
- q. All estimates are based on a 6.5 hour hearing day.
- r. A buffer of 0.5 day is added to each topic to factor any variables or requests for additional time by submitters in that topic.

- s. Time has been added to each topic for the Council to present its case on rezoning and precinct submissions in each topic.

Estimates of the hearing time required

30. Based on the assumptions set out above, the total hearing days required on rezoning and precincts are detailed on page 9 of this letter.
31. See **Attachment 3** to this letter for a breakdown of estimated hearing time by topic.
32. In preparing these estimates the Council has:
- Considered all submitters who stated on their submission that they wish to be heard for rezoning and precinct submissions;
 - Factored additional time required for major submitters and complex submissions;
 - Removed duplicates among submitters with submissions on rezoning and precinct matters;
 - Accounted for further submitters to the Topic; and
 - Provided adequate time for precinct submissions to be heard.
33. Looking at the range of hearing scenarios envisaged, the 60% turn-out is the most likely scenario and is therefore considered to be the most appropriate to use in programming the hearing days for the rezoning and precinct topics. A 60% turn-out is thought to be most likely as the Council considers there will be a higher level of submitter interest in the rezoning and precinct topics, as reflected in the proportion of submitters who have advised that they wish to be heard.
34. The Council recognises that there are significant time and resource pressures involved in hearing submissions on the PAUP, and that the rezoning and precinct topics account for a significant proportion of submissions. The Council respectfully suggests that there would be merit in the Panel exploring the following options in an effort to enable the most efficient use of hearing time, and shorten the hearing days beyond that shown on page 9 of this letter:
- Running a greater number of hearings, potentially simultaneously (noting that the LGATPA¹ currently provides for two hearings to take place at any one time);
 - Further refining the Public Open Space and Special Purpose zone-based topics;
 - Further refining the Central and North geographical hearing topics;
 - A more targeted approach to addressing Housing NZ's submissions and the related further submissions;
 - Encouraging submitters to present joint cases where possible;
 - Setting aside one hearing day for the Public Open Space submissions from the Council which have a large number of further submissions in opposition;
 - Reducing hearing time for matters that have been or can be addressed in previous hearings;
 - Identifying submissions concerning particular errors and corrections that could be dealt with on the papers where there is no opposition to such an approach; and
 - Identifying submissions where the Council and all relevant submitters (and further submitters) have reached agreement on the papers.

¹ Local Government (Auckland Transitional Provisions) Act 2010

Three Scenarios for programming hearing days (in total)						
	80% PS attendance + 20% FS attendance + Council case presentation time	Buffer added to 80% attendance	60% PS attendance + 20% FS attendance + Council case presentation time	Buffer added to 60% attendance	50% PS attendance + 20% FS attendance + Council case presentation time	Buffer added to 50% attendance
Proposed Hearing topics						
Auckland-wide						
Zone-based						
Auckland-wide	8	8.5	7	7.5	7	7.5
Public Open Space	23	23.5	17	17.5	15	15.5
Coastal	4	4.5	4	4.5	4	4.5
Special Purpose zones (12 sub-topics)	15	21.0	13	19.0	12	18.0
Theme-based						
Volcanic Viewshaft Height Sensitive Area	2	2.5	2	2.5	2	2.5
Flood Plains	6	6.5	5	5.5	4	4.5
Special Character	6	6.5	5	5.5	4	4.5
Electricity Transmission Corridor	2	2.5	1	1.5	1	1.5
Geographical						
Central	46	48.0	37	39.0	32	34.0
South	23	22.5	19	21.5	17	19.5
West	10	13.0	9	12.0	8	11.0
North Shore	45	48.0	36	39.0	31	34.0
Rodney	26	31.0	22	27.0	20	25.0
Days in Total*	215	238	177	202	159	183

*All numbers rounded up to the nearest whole number.
PS = Primary Submitter
FS = Further Submitter

F. Estimates of time required for pre-hearing meetings

Rezoning submissions

35. Due to the amount of submission points and further submission points the Council recognises that there are limitations in holding pre-hearing meetings for rezoning submissions.
36. However, the Council considers that there would be merit in scheduling a pre-hearing meeting for all major submitters, so that: the submitters can clarify their issues, the Panel can hear from further submitters, and all parties can identify witnesses they will be calling for the hearing.
37. In addition, the Council considers that there would be benefit in having pre-hearing discussions with all other submitters, potentially using a series of open days at which submitters could discuss their submission with Council officers directly. A set number of open days could possibly be held for each hearing topic.
38. The Council anticipates that the open day process would be useful in order to seek clarification in relation to submission points, and a better understanding of key issues for each submission. It is not expected that this process will necessarily result in sign-off or resolution of a submission.
39. The Council proposes to run the open days in October 2015, post completion of hearings on the Residential zone provisions. Open days on specific zones, such as Public Open Space could potentially be held earlier. It is expected that this process would take approximately two to three weeks to complete and that the open days could take place in various locations around the Auckland region.
40. In developing the detail of these open days, the Council would welcome any input or directions from the Panel.
41. Those who have made submissions on precincts would be invited to attend the open days, in accordance with the process set out at paragraphs 36-39 above.
42. The Council respectfully suggests that a pre-hearing meeting could be scheduled for the Public Open Space, Coastal and Special Purpose Topics, which could be targeted as follows:
 - For Public Open Space, two days could be scheduled comprising of a half day per geographical area (Central, North, South and West). At the commencement of each session the Council could present information on its own submission on the PAUP, explaining that the majority of submission points seek to correct zoning errors. It is anticipated that this approach may satisfy further submitters and therefore reduce the hearing time required.
 - For the Coastal and Special Purpose Topics, a pre-hearing meeting would be useful for identifying the issues that may have been addressed in previous hearings, and to discuss whether mediation would be beneficial for the outstanding issues. Time could be set aside to have pre-hearing discussions structured around each Coastal and Special Purpose zone.

Precinct submissions

43. The Council considers that mediation may be useful for the submissions on existing precincts and requests for new precincts. This is because the precinct submissions address the site specific provisions that apply within the boundaries of the precinct, as well as its spatial boundaries. Furthermore, the Council's experience with mediation for

the precinct provisions in Topic 050 - City Centre was extremely positive as it resolved many issues and significantly narrowed the scope of issues still in contention for the hearing.

44. The Council does not anticipate mediation would occur for all precincts (existing and new precinct requests). A list of existing and new precincts that would benefit from mediation can be provided to the Panel by Monday, 31 August 2015. The Council is currently in the process of carrying out a detailed analysis of the relief sought by submitters on these existing and new precinct submissions. The Council will be able to confirm with the Panel by Monday, 31 August 2015 the precincts it considers would benefit from mediation.
45. For precincts, the Council respectfully suggests that three hours of mediation be allocated where mediation may be appropriate. A breakdown of the estimated time required for mediation on the precincts (broken down by topic) is set out in **Attachment 3** of this letter.

G. Identification of Major Submitters and sufficiency of supporting information provided

46. The Council has undertaken a review of all major submitters' submissions to identify the level and sufficiency of information provided to support their submission. The assessment is based on a rating of 1-3:
 - 1 = no supporting information provided
 - 2 = some supporting information provided
 - 3 = extensive supporting information provided
47. The rating of supporting information provided by each major submitter is identified in **Attachment 6** of this letter.
48. The Council considers that there would be merit in scheduling a pre-hearing meeting for all major submitters, so that the submitters can clarify their issues, the Panel can hear from further submitters, and all parties can identify the witnesses they will be calling at the hearing.

H. Proposed alternative approach to Council evidence and reporting to Panel

49. The current evidence exchange directions from the Panel generally require the Council to circulate amended track-change provisions for a topic in advance of mediation (in which case the submitters are 'on notice' of the Council's position), and for the Council to file its evidence first, with submitters filing evidence in response. Following submitter evidence exchange, the Council can filing rebuttal evidence with the Panel.
50. The Council considers that there are opportunities to reduce the need for evidence, and to make the hearings more efficient for the rezoning and precinct topics. The Council respectfully suggests that it prepares evidence that takes the form of a section 42A (of the Resource Management Act 1991) report for the rezoning and precinct hearings.
51. The Council considers that the section 42A report (or report(s)) approach could: (a) summarise the relevant submissions; (b) clearly identify the issues in dispute; (c) attach memoranda from each of the Council's technical experts setting out their opinions on accepting or rejecting proposed changes; (d) attach any joint memoranda; (e) provide a Council position on each of the issues in dispute; (f) attach any expert witness statements; and (g) attach a track-change version of the provisions and/or maps.

52. The Council considers that it would of assistance to the Panel, and submitters, for such a report to be prepared for each of the proposed Auckland-wide theme-based, specific zone-based and geographical area topics identified in this letter, in place of the Council filing multiple briefs of evidence. The Council considers that submitters should then have the opportunity to file evidence in relation to their submission, with reference back to the Council's report (if required), and that the Council should have the opportunity to file evidence in rebuttal.
53. The Council also acknowledges that, unlike other PAUP topics, rezoning submissions seek changes to the zoning maps rather than changes to text (although some submitters seeking to rezone are also seeking changes to the zone provisions). The Council intends, in its evidence, to produce three versions of the maps per topic for the PAUP: (a) the PAUP zones as notified; (b) the zoning changes proposed by submitters; and (c) the zoning changes proposed by the Council.
54. The Council proposes to prepare evidence on the Council approach to rezoning and precincts that will be filed in advance of the first hearing, and which can be cross-referenced throughout the various rezoning and precinct hearings. The Council would use the standard evidence template to present the Auckland-wide Topic.

I. Key questions and directions sought from the Panel

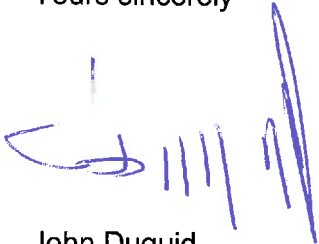
55. In light of the above matters, the Council respectfully requests clarification and direction from the Panel on the following matters:
 - While the Council acknowledges that there is no requirement to provide supporting information with a submission, the Council has difficulties considering the merits of a submission where they are seeking a new precinct and/or made a complex rezoning request. In the absence of such information, the Council respectfully requests that the Panel ask submitters to provide their supporting information 12 weeks in advance of the scheduled hearing for which the submission relates; and
 - To assist the Council's consideration of submissions where insufficient information has been provided by submitters, the Council respectfully requests that the Panel direct submitters to advise the Panel at the Pre-Hearing Conference of any expert evidence they intend to call in support of their submission/s.

Conclusion

56. Following the receipt of this letter, we respectfully request that the Panel:
 - Confirm that the existing precinct and rezoning topics be replaced with the Council's proposed topics as set out in **Attachment 1**;
 - Agree that the approach and assumptions be discussed with the Council and submitters at a pre-hearing conference meeting, to be scheduled in July 2015, and that the proposed programme be adjusted, as required, as a result of that meeting;
 - Schedule pre-hearing meetings for the major submitters on the rezoning and precinct topics;
 - Provide direction on the Council's proposal for open days;
 - Provide direction on the Council's request to ask submitters to provide supporting information and any expert evidence they intend to call in support of their submission/s; and
 - Provide direction on the Council's proposed approach to evidence and reporting.

If you have any queries, please do not hesitate to contact Celia Davison, Team Leader Unitary Plan or myself.

Yours sincerely



John Duguid

Unitary Plan Manager