

2.36 – Reserve management plans - section 32 evaluation for the Proposed Auckland Unitary Plan

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1 Overview and Purpose

This evaluation should be read in conjunction with Part 1 in order to understand the context and approach for the evaluation and consultation undertaken in the development of the Proposed Auckland Unitary Plan (the Unitary Plan).

1.1 Subject Matter of this Section

This report assesses the relationship between the Unitary Plan and adopted Reserve Management Plans and whether or how the latter should be referenced in the Unitary Plan's Public Open Space zone rules and assessment criteria.

1.2 Resource Management Issue to be Addressed

The resource management issue is how best to manage the use and development of public open space in the Auckland region, given the requirements of the Resource Management Act and the Reserves Act (for public open space that is vested as reserve).

The RMA requires the following matters to be taken into account when preparing a District Plan:

S. 74 - Matters to be considered by territorial authority

(1) A territorial authority shall prepare and change its district plan in accordance with its functions under s.31, the provisions of Part 2, a direction given under s.25A(2), its duty under s.32, and any regulations.

(2) In addition to the requirements of s.75(3) and (4), when preparing or changing a district plan, a territorial authority shall have regard to—

- (a) any—
 - (i) proposed regional policy statement; or
 - (ii) proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4; and
- (b) any—
 - (i) management plans and strategies prepared under other Acts; and
 - *(ii) [Repealed]*
 - (iia) relevant entry in the Historic Places Register; and
 - (iii) regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taia pure, mahinga mataitai, or other non-commercial Māori customary fishing),—
 - to the extent that their content has a bearing on resource management issues of the district; and
- (c) the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.

1.3 Significance of this Subject

Existing Auckland legacy District Plans reference Reserve Management Plans in a variable manner. Some, such as Papakura do not contain any reference to Reserve Management Plans, while others such as Auckland City – Isthmus and North Shore City refer to Reserve Management Plans in the open space zone assessment criteria.

1.4 Auckland Plan

As the subject matter of this s.32 report is a technical matter involving methods only, there is no relevant direct reference in the Auckland Plan. The Auckland Plan does contain a number of priorities and directives in relation to open space and recreation, but these are not considered relevant to this s.32 assessment.

1.5 Current Objectives, Policies, Rules and Methods

There are no specific objectives and policies in the legacy District Plans that provide a link to Reserve Management Plans. The legacy Auckland District Plan approaches to referencing Reserve Management Plans occurs through the methods (activity tables and assessment criteria) and currently are:

Franklin

- Permitted activities in the Recreation Zone include:
 - BUILDINGS in accordance with approved Reserve Management Plans;
 - BUILDINGS not provided for in Reserve Management Plans which do not exceed 50 m² In GROSS FLOOR AREA;
- Assessment Criteria
 - Any relevant Reserve Management Plan provisions;

Papakura

- No reference to Reserve Management Plans in the Activity table
- No reference to Reserve Management Plans in the assessment

Manukau

- No reference to Reserve Management Plans in the Activity table
- No reference to Reserve Management Plans in the assessment criteria (although there is reference to them in the policies as a method of implementation).

Auckland City – Isthmus

- No reference to Reserve Management Plans in the Activity Table
- Reference to a specific Reserve Management Plan in the assessment criteria – e.g. Any development shall be subject to the controls of the District Plan and generally in accordance with the One Tree Hill Domain Management Plan

North Shore

- reference to Reserve Management Plans but only in respect of Temporary activities (as defined in 3.10.3) on land administered by the Department of Conservation and conducted in terms of a conservation management strategy or plan and or the Reserves Act 1977
- reference to Reserve Management Plan in the Assessment Criteria
 - k) Reserve Management PlanIn considering the matters outlined in a) to l) regard shall be had to the extent to which the proposed development and activities comply with an approved management plan prepared under the Reserves Act 1977.

Rodney

- Permitted Activity in Open Space 1 Zone
 - Activities of the Crown within the boundaries of any area of land held or managed under the Conservation Act 1987, or any other Act specified in the First Schedule to that Act (except on land held for administrative purposes), consistent with the provisions of a Conservation Management Strategy or Plan, that does not have a significant effect beyond the boundary of the land.
- No reference to Reserve Management Plans in the Assessment Criteria

Waitakere

- No reference to Reserve Management Plans in the Activity Table
- Reference to Operative Reserve Management Plans in the Assessment Criteria e.g. 2(e)
 - The extent to which the Parks Buildings, Parks Facilities, Parks Furniture, Parks Infrastructure or Parks Signs are in accordance with the provisions of a relevant

Operative Reserve Management Plan, Parks Concept Plan, current Waitakere City Parks Strategy or current operative Regional Parks Management Plan.

Existing commentary on Reserve Management Plans

The Manukau and Rodney District Plans contain the following commentary on the relationship between the respective District Plans and Reserve Management Plans:

- Rodney
The Reserve Management Plan process is prescribed by the Reserves Act 1977 and the Local Government Act 1974, and involves community consultation to establish objectives and policies relating to the management of particular existing reserves. It is considered that the more detailed issues, for example, the allocation of space and any conflicts between activities on the reserve, are more appropriately addressed through the Reserve Management Plan process than the district plan rules, as specific local circumstances can be taken into account. However, the Open Space zones in the Unitary Plan will guide this process by determining the activities that can occur within each zone.
- Manukau
Reserve Management Plans are required for public open space areas classified as 'reserve' under the Reserves Act 1977. The Manukau Parks Activity of Manukau City Council is responsible for developing and producing Reserve Management Plans for public open space areas administered by this council. The activity actively consults Mana Whenua authorities in the development of Reserve Management Plans. It is envisaged that all major Manukau City administered public open space areas will have a Reserve Management Plan which will provide a comprehensive planning approach to the development of each particular public open space. In some cases a group of public open space areas (e.g. neighbourhood reserves) may be covered by one Reserve Management Plan.

Issues relating to the detailed allocation of space, landscape design, layout, planting and specific uses of each public open space will be handled through the Reserve Management Plan process. The allocation of space within the Passive Outdoor Informal Recreation Zone P.O.S 2 zone, for active recreation (e.g. kilikiti and touch rugby training) is also managed by the Reserve Management Plan process. This is because costs outweigh the benefits of using District Plan rules, and it is considered that the Reserve Management Plan process is a more appropriate way of resolving more detailed issues of conflicts between different users of public open space.

Summary

Franklin is the only former Auckland region legacy district plan that refers to Reserve Management Plans in the activity table for public open space.

Franklin, North Shore and Waitakere district plans refer directly to Reserve Management Plans in the assessment criteria. Auckland City Isthmus District Plan does but only in respect of the One Tree Hill Domain Management Plan.

A large number of parks and reserves in the Auckland region do not have a Reserve Management Plan or the plan is outdated.

1.6 Information and Analysis

An analysis of the existing Auckland region district plan objectives, policies and methods was undertaken. The results of this are summarised in section 1.5 of this report.

An analysis of several District Plans across New Zealand was also undertaken to determine how Reserve Management Plans were referenced in Unitary and District Plans. This

included the following plans which do include a direct reference in either the “open space and recreation zone” (or equivalent) activity table and/or assessment criteria:

- Marlborough Sounds Resource Management Plan
- Napier District Plan
- Nelson Resource Management Plan
- Palmerston North City District Plan
- Wairarapa Combined District Plan

1.7 Consultation Undertaken

There has been both support for and questioning of the approach from council’s internal teams, especially parks, sport and recreation. There was no formal consultation with external stakeholders undertaken in relation to this matter. A meeting was held with the Department of Conservation to discuss a number of Unitary Plan matters. At that meeting they requested that reference be made in the Unitary Plan to Conservation Management Plans and Strategies. Feedback on this matter was also received from the Department of Conservation.

1.8 Decision-Making

This matter has not been to any political decision making forum of the Council. It has been discussed at Unitary Plan management review sessions.

1.9 Proposed Provisions

The provisions in the proposed Unitary Plan are:

4.3.2 Public Open Space zones

The following provisions form part of the district plan.

1. Activity table

The following table specifies the activity status of activities in the Public Open Space zone.

<i>Activity</i>	<i>Conservation</i>	<i>Informal Recreation</i>	<i>Sport and Active Recreation</i>	<i>Civic Spaces</i>	<i>Community</i>
<i>Any activity in accordance with an incorporated precinct plan or adopted reserve management plan, conservation management strategy or conservation management plan</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>

<i>Activity</i>	<i>Conservation</i>	<i>Informal Recreation</i>	<i>Sport and Active Recreation</i>	<i>Civic Spaces</i>	<i>Community</i>
<i>Any activity identified in an incorporated precinct plan or adopted reserve management plan, conservation management strategy or conservation management plan but not in the location specified on that plan</i>	<i>RD</i>	<i>RD</i>	<i>RD</i>	<i>RD</i>	<i>RD</i>

4. Assessment

4.1 Restricted discretionary activities

4.1.1 Matters of discretion

The council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the activity table.

<i>Activity/matters of discretion</i>	<i>Intensity and scale</i>	<i>Traffic and access</i>	<i>Site layout, landscaping and design</i>	<i>Effects on the natural environment</i>	<i>Incorporated precinct plan and adopted Reserve Management Plans</i>
<i>Any activity or building identified in an incorporated precinct plan or adopted reserve management plan, conservation management strategy or conservation management plan but not in the location specified on that plan</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>

5.2 Assessment Criteria

6. Incorporated precinct plan/adopted reserve management plans

a. The proposal should be consistent with the outcomes sought in any relevant incorporated precinct plan or adopted reserve management plan for the public open space.

1.10 Reference to other Evaluations

Refer to the Section 32 Topic Matrix for reference to related s.32 evaluations.

These include:

- 2.11 Biodiversity
- 2.12 Pre-1944 Demolition
- 2.13 Historic Heritage
- 2.14 Treaty settlements
- 2.15 Mana Whenua cultural heritage
- 2.16 Māori development
- 2.18 Māori and natural resource management
- 2.19 Landscapes
- 2.31 Earthworks

2 Objectives, Policies and Rules

2.1 Objective

There are no specific objectives referring directly to incorporated precinct plans, Reserve Management Plans, Conservation Management Plans or Strategies. With the exception of incorporated precinct plans, these are all non RMA methods that can be used to give effect to the Public Open Space objectives and policies.

2.1.1 Policies

There are no specific policies referring directly to incorporated precinct plans, Reserve Management Plans, Conservation Management Plans or Strategies. With the exception of incorporated precinct plans, these are all non RMA methods that can be used to give effect to the Public Open Space policies.

2.1.2 Rules and other methods

The following is an evaluation of the appropriateness of the methods in achieving the purpose of the RMA and the Bill and is made in the context of the identified issue.

The methods in the proposed Unitary Plan include:

- reference to precinct plans, Reserve Management Plans or Conservation Management Plans or Strategies in the public open space activity table
- reference to precinct plans, Reserve Management Plans or Conservation Management Plans or Strategies in the public open space assessment criteria

Relevance

The purpose of the rule and assessment criteria is to provide a direct link between the Unitary Plan provisions relating to the use of public open space and adopted Reserve Management Plans. The reference in the assessment criteria to these plans enables the consideration of whether a proposal is in accordance with what the relevant plan seeks to achieve.

Usefulness

The relationship of the Reserves Act to the RMA is a complementary one. Together, the acts operate a dual mechanism for protecting and managing land classified as reserve land under the Reserves Act. The RMA sets the legal basis for the Unitary Plan in managing the effects on the environment of activities taking place on public open space zones.

While the Reserves Act ultimately determines the types of uses appropriate for those public open space areas that are classified under the Act, the purpose and principles of the RMA

must guide all environmental policy and management. However, in doing so consideration must be given to any management plans and strategies prepared under other acts (RMA, s. 74(2)(b)).

A rule linking the Unitary Plan with adopted Reserve Management Plans, Conservation Management Plans and Strategies is useful, given the complementary functions of both acts and plans.

Achievability

S.74 of the Resource Management Act outlines the matters to be considered by territorial authorities when preparing district plans. Regard must be had to management plans and strategies prepared under other Acts, to the extent that their content has a bearing on resource management issues of the district .

The Act therefore envisages a relationship between the Unitary Plan and Reserve Management Plans.

Reasonableness

The proposed Unitary Plan public open space zones' activity table enables activities identified in Reserve Management Plans as a permitted activity. All permitted activities are required to comply with the permitted activity performance standards. Those activities identified in Reserve Management Plans, but are proposed to be undertaken in locations not in accordance with the plan are proposed to be a restricted discretionary activity.

If an activity (i.e. the use of land) is identified in a Reserve Management Plan, that has been through a public process, it is reasonable that the Unitary Plan should afford some recognition to this. The need for a resource consent may be triggered by non compliance with any of the permitted activity performance standards, including the gross floor area threshold.

Likewise when assessing the appropriateness of a land use activity or development, it is reasonable to consider the provisions of a more detailed Reserve Management Plan.

Legacy Issues

The majority of the Auckland City legacy District Plans do not contain a direct link from the public open space zones (or equivalent) activity table to Reserve Management Plans.

Note: There is direct reference to activities in Reserve Management Plans in many District Plans throughout the country, as discussed in section 1.6.

2.1.3 Costs and Benefits of Proposed Rules

The costs and benefits of the proposed Unitary Plan's Public open space zones containing a direct reference to Reserve Management Plans, Conservation Management Plans and Strategies is contained in section 3 of this report.

2.1.4 Adequacy of Information and Risk of Not Acting

It is considered that there sufficient information on which to base the proposed methods.

3 Alternatives

The proposed preferred alternative is discussed in 2.0 above. The status quo alternative is outlined in 1.5 above.

Alternatives are

1. Alternative 1 - Status quo - Unitary Plan is silent on Reserve Management Plans;

2. Preferred Alternative 2 - Unitary Plan has direct reference to Reserve Management Plans in the Public Open Space Activity Table and Assessment Criteria;
3. Alternative 3 - Unitary Plan has reference to Reserve Management Plan in the Public Open Space Assessment Criteria only;
4. Alternative Four – Unitary Plan incorporates adopted Reserve Management Plans (i.e. an Incorporated Document)

The table below discusses each alternative compared to the Preferred Alternative

	Alternative 1 - Unitary Plan is silent on Reserve Management Plans (effectively the Status Quo)	Preferred Option Alternative 2 - Unitary Plan has direct reference to Reserve Management Plans in the Public Open Space Activity Table and Assessment Criteria	Alternative 3 - Unitary Plan has reference to Reserve Management Plan in the Public Open Space Zone Assessment Criteria only	Alternative Four – Unitary Plan incorporates adopted Reserve Management Plans (i.e. an Incorporated Document)
Appropriateness	<ul style="list-style-type: none"> Many of the current legacy Auckland District Plans adopt this approach. It is effectively the status quo option. 	<ul style="list-style-type: none"> Approach is not currently used in the legacy Auckland District Plan, but is widely used throughout many parts of the country. Legality of the approach could be challenged. 	<ul style="list-style-type: none"> This option provides a much looser link to adopted Reserve Management Plans. They become only one of many matters to take into account on whether consent should be granted. 	<ul style="list-style-type: none"> Would not be appropriate to incorporate adopted Reserve Management Plans in their entirety into the Unitary Plan. Would significantly add to the complexity of the Unitary Plan. There are more appropriate ways of distinguishing between the land ownership/stewardship/ management role with the regulatory functions (of the Unitary Plan).
Effectiveness	<ul style="list-style-type: none"> The land ownership/stewardship/ management role is clearly separated from the regulatory functions of the Unitary Plan. There may be some doubling up or conflicts with other activities in the activity table e.g. organised sports and recreation not being a permitted activity in the conservation and informal recreation zones. 	<ul style="list-style-type: none"> Some adopted Reserve Management Plans might not be sufficiently certain to allow for clear application and understanding of permitted activity thresholds – this is particularly so in terms of development, as opposed to land use. 	<ul style="list-style-type: none"> Provides a link between the Unitary Plan and adopted Reserve Management Plans via the assessment criteria. 	<ul style="list-style-type: none"> Questionable whether there is a need to incorporate all Reserve Management Plans. Confuses the land ownership/stewardship/ management role with the regulatory functions (of the Unitary Plan).
Efficiency	<ul style="list-style-type: none"> The land ownership/stewardship/ management role is clearly separated from the regulatory functions of the Unitary Plan. There may be some doubling up or conflicts with other activities in the activity table e.g. organised sports and recreation not being a permitted activity in the conservation and informal recreation zones. 	<ul style="list-style-type: none"> Is an efficient approach as there is direct reference to adopted Reserve Management Plans (which are more detailed and location specific). There may be some doubling up or conflicts with other activities in the activity table e.g. organised sports and recreation not being a permitted activity in the conservation and informal recreation zones. 	<ul style="list-style-type: none"> Represents an efficient method of providing a link between the Unitary Plan and adopted Reserve Management Plans. 	<ul style="list-style-type: none"> Does not represent an efficient process – especially where adopted Reserve Management Plans are changed or updated – a subsequent plan change or variation would be required.
Costs	<ul style="list-style-type: none"> In terms of land use the approach is cost neutral. The Reserves Act and Reserve Management Plans ultimately determine the types of activities able to be undertaken on public open space. The absence of any reference in the assessment criteria to an adopted Reserve Management Plan does mean that such documents could be overlooked in determining resource consents. 	<ul style="list-style-type: none"> May confuse the land ownership/stewardship/management role with the regulatory functions of the Unitary Plan. There may be activities identified in adopted Reserve Management Plans which are inconsistent with the outcomes sought in the Unitary Plan for public open space, although these would be subject to the performance standards for permitted activities. Some adopted Reserve Management Plans might not be sufficiently certain to allow for clear application and understanding of permitted activities. 	<ul style="list-style-type: none"> There is only a looser link between the Unitary Plan and adopted Reserve Management Plans (in comparison to alternative 2) Adopted Reserve Management Plans are only able to influence activities that require a consent. They are unable to determine permitted activities. 	<ul style="list-style-type: none"> All adopted operative Reserve Management Plans become part of the Unitary Plan as an incorporated document. Any change to a Reserve Management Plan would require a change to the Unitary Plan.
Benefits	<ul style="list-style-type: none"> The land ownership/stewardship/management role is clearly separated from the regulatory functions of the Unitary Plan. Adopted Reserve Management Plans can be referred to under s. 104(1)(c). This could negate the need for them to be directly referred to in the assessment criteria. 	<ul style="list-style-type: none"> There is a direct linkage between the Unitary Plan and adopted Reserve Management Plans so that where a land use is identified in an adopted Reserve Management Plan it is a permitted activity under the Unitary Plan. (Note: permitted activities are still required to comply with the relevant performance standards) 	<ul style="list-style-type: none"> Establishes a relationship between the Unitary Plan and adopted Reserve Management Plans but only in respect of activities where a consent is required. Avoids doubling up or conflicts with other activities in the activity table e.g. organised sports and recreation not being a permitted activity in the conservation and informal recreation zones. 	<ul style="list-style-type: none"> The contents of adopted Reserve Management Plans can be referred to directly by the Unitary Plan. Consistency between the Unitary Plan and adopted Reserve Management Plans.

Risks	<ul style="list-style-type: none"> There is no overt relationship between the Unitary Plan and adopted Reserve Management Plans, although such plans can be referred to under s. 104(1)(c) (1) When considering an application for a resource consent and any submissions received, the consent authority must, subject to Part 2, have regard to– (c) any other matter the consent authority considers relevant and reasonably necessary to determine the application. 	<ul style="list-style-type: none"> There may be activities identified in adopted Reserve Management Plans which are inconsistent with the outcomes sought in the Unitary Plan for public open space. Some adopted Reserve Management Plans are outdated. Some adopted Reserve Management Plans might require updating to meet current best practice in terms of matters such as urban design and crime prevention through environmental design (CPTED) issues. Some adopted Reserve Management Plans might not be sufficiently certain to allow for clear application and understanding of permitted activities. 	<ul style="list-style-type: none"> There are few risks associated with this approach. Could confuse the management roles of the Reserve Management Plan with the regulatory role of the Unitary Plan. 	<ul style="list-style-type: none"> There may be activities identified in adopted Reserve Management Plans which are inconsistent with the outcomes sought in the Unitary Plan for public open space. Some adopted Reserve Management Plans are outdated. Some adopted Reserve Management Plans might require updating to meet current best practice in terms of urban design and CPTED issues. Some adopted Reserve Management Plans might not be sufficiently certain to allow for clear application and understanding of permitted activity thresholds – this is particularly so in terms of development (as opposed to land use).
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4 Conclusion

Based on the above discussion, the following conclusions are drawn:

Alternative 2 - Unitary Plan has direct reference to Reserve Management Plans in the Public Open Space Activity Table and Assessment Criteria is the **preferred option** and has a number of benefits over the other options. These are:

- Approach is not currently used in the legacy Auckland District Plan, but is widely used throughout many parts of the country.
- Represents an efficient approach as there is direct reference to adopted Reserve Management Plans
- Any activity identified in adopted Reserve Management Plans which is inconsistent with the outcomes sought in the Unitary Plan for public open space would still be subject to the performance standards for permitted activities e.g. noise, lighting, yards, height, gross floor area threshold.
- There is a direct linkage between the Unitary Plan and adopted Reserve Management Plans so that where a land use is identified in an adopted Reserve Management Plan it is a permitted activity under the Unitary Plan (if it is in the location identified in the reserve management plan, otherwise it is a restricted discretionary activity. (Note: permitted activities are still required to comply with the relevant performance standards)

The disadvantages associated with the approach are:

- There may be activities identified in adopted Reserve Management Plans which are inconsistent with the outcomes sought in the Unitary Plan for public open space.
- Some adopted Reserve Management Plans are outdated.
- Some adopted Reserve Management Plans might require updating to meet current best practice in terms of matters such as urban design and crime prevention through environmental design (CPTED) issues.
- Some adopted Reserve Management Plans might not be sufficiently certain to allow for clear application and understanding of permitted activities.

Consequently, the following objectives and policies are recommended (with changes highlighted):

The provisions in the proposed Unitary Plan are:

4.3.2 Public Open Space zones

The following provisions form part of the district plan.

1. Activity table

The following table specifies the activity status of activities in the Public Open Space zone.

Activity	Conservation	Informal Recreation	Sport and Active Recreation	Civic Spaces	Community
<i>Any activity in accordance with an incorporated concept or precinct plan or adopted reserve management plan, <u>conservation management strategy or conservation management plan</u></i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>	<i>P</i>
<i>Any activity identified in an incorporated concept or precinct plan or adopted reserve management plan, <u>conservation management strategy or conservation management plan</u> but not in the location specified on that plan</i>	<i>RD</i>	<i>RD</i>	<i>RD</i>	<i>RD</i>	<i>RD</i>

4. Assessment

4.1 Restricted discretionary activities

4.1.1 Matters of discretion

The council will restrict its discretion to the matters below for the activities listed as restricted discretionary in the activity table.

Activity/matters of discretion	Intensity and scale	Traffic and access	Site layout, landscaping and design	Effects on the natural environment	Incorporated concept or precinct plan and adopted Reserve Management Plans
<i>Any activity or building identified in an incorporated concept or precinct plan or adopted reserve management plan, <u>conservation management strategy or conservation management plan</u> but not in the location specified on that plan</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>

5.2 Assessment Criteria

6. Incorporated precinct plan/adopted reserve management plans

a. The proposal should be consistent with the outcomes sought in any relevant incorporated concept or precinct plan or adopted reserve management plan for the public open space.

5 Record of Development of Provisions

5.1 Information and Analysis

- Resource Management Act 1991

- *Assessment of existing objectives and policies and methods in the Auckland region legacy District Plans*
- *Assessment of District Plan provisions (i.e. the relationship between the public open space section, or equivalent and Reserve Management Plans) throughout the country.*

5.2 Consultation Undertaken

There has been support for the approach of including reference to reserve management plans in the public open space zone activity table and assessment criteria from Auckland Council's internal teams, especially parks, sport and recreation.

No specific external consultation on this matter has occurred, with the exception of discussions with the Department of Conservation who requested that Conservation Management Plans and Strategies be included in the activity table. This also formed part of their feedback.

No specific feedback was received on the draft Unitary Plan in respect of this matter, except for the feedback from the Department of Conservation as described above.

5.3 Decision Making

There was no direct political decision making associated with this topic. It has been discussed at Unitary Plan management review sessions.