

Surveyor- General’s response to feedback on draft Guidelines for Addressing In-fill Developments

We received 23 submissions in total. 17 were from Territorial Authorities (‘TAs’), 4 from survey organisations (representative bodies and firms) and 2 from Fire and Emergency.

Submissions from Territorial Authorities	17
Submissions from survey organisations	4
Submissions from emergency services	2
Total number of submissions	23

There was a good spread of TAs from both the north and south islands - from TAs in large cities to TAs covering much smaller populations.

The submissions also varied widely – some were quite brief, but others were detailed with diagrams to illustrate the points being made.

This document records feedback received and the corresponding response of the Surveyor-General.

Does the look and feel of the guideline (layout, fonts, colours) make sense to you?

Feedback:

- “Colours are associated with LINZ so makes perfect sense.”
- “it is easy on the eye and its purpose is explained clearly”
- “Is also clear if printed in black and white”
- “We do encourage each clause to be numbered in a way that facilitates easy reference.”
- “It’s easier if each section is numbered sequentially (much like an address!) for easy reference, as per p15. Early sections just have headings and bullet points.”
- “Give the sub categories numbers as well. Eg. 3.3 Use of Sub-address numbering and 3.3.1 Generic Requirements for sub-address numbering. There is no point having (a), (b), (c) under this subheading (generic requirements for...) when the next one has the same letters again, especially when numbering. The alternative is simply to continue the lettering under 3.3 to be a-h instead of a,b,c,d,e,a,b,a”

Response:

The consultation draft has been re-numbered so that sections and paragraphs are numbered sequentially in the final document. The format has also been changed to make the document more compact.

Please provide any feedback on the Preface.

Feedback:

- "this is fine and I can understand its format while a couple of sentences are quite long."
- "Makes sense, no comments"
- "Looks okay"
- "Seem to be clear and self explanatory."
- "Provides good context"

Response:

Noted with thanks. Some sentences have been updated or simplified.

Foreword

Feedback:

"The 1st paragraph states "Since then LINZ has been working closely with Territorial Authorities to improve the quality of allocated addresses." Do we need to mention roads?"

Response:

This is implied – a road is a component of an address.

Feedback:

"In the Foreword on page 4 of the Guidelines, there is reference to the "primary aim of the Standard, and these Guidelines...". This is very good and should be considered, especially when considering anything that is non-standard.

It can be the reason for exceptions."

Response:

Agreed.

Feedback:

"On page 5, address is defined as "structured information that uniquely identifies a site". A legal description does this better than an address. The definition of address should be extended to say "structured information, including a road name, that uniquely identifies a site."

Response:

This suggestion has not been accepted. An address uniquely distinguishes a site and enables it to be easily identified and physically located, whereas a legal description of land is a reference that describes the land contained in a record of title by reference to a survey plan or appellation.

Introduction

d) improve understanding of addressing requirements.

Feedback:

"...There appears to be variable standards of flexibility throughout region and TA's as to how they manage and control the road naming process.

Although the Guideline includes narrative about road naming requirements, and each TA has their own road naming procedure, the TA is predominantly the sole arbiter of the final road name allocated. Although this has a legislative basis, the Guideline would be enhanced by including some national road naming conventions that TA's could adopt to provide a consistent application of rules."

Response:

AS/NZS 4819: 2011 Rural and urban addressing standard ("Standard") already provides generic guidance for addressing authorities to use for assigning addresses, naming roads and localities; recording and mapping the related information and signage. The Standard should be complied with as much as possible but these guidelines include possible alternatives for creating addresses for in-fill development. They are intended to assist with maintaining the overall integrity and application of the addressing and road naming system when the practical implications on the ground require an exception to the Standard's directives.

(g) Urban v rural developments

Feedback:

"(g) this section is not as clear as it could be, the guidelines state they are for infill but (g) of the preface suggests they apply to rural lifestyle development also."

Response:

The Preface has been amended to clarify where these guidelines could be used for rural as well as urban developments.

Purpose

(d) road naming or renumbering

Feedback:

"...Any road (re)naming or renumbering would require thorough communication and consultation with all affected parties."

Response:

Agreed. This is encouraged in sections 1.3 Planning for In-fill Subdivision, 1.5 TA's authority to allocate addresses, and 3.2 Generic requirements for road naming.

TA's authority to allocate addresses

Feedback:

"On page 9 it says that the Act does not explicitly empower a TA to name a private way. Where a name is needed as part of a Council assigned address, the TA needs to be given authority to approve a name (this is not just private ways). At the same time, the legislation needs to be changed to allow a TA to approve a name without the need for a formal resolution. Each TA should be allowed to have a policy that says which names will be approved under delegation and which by resolution of the TA. Formal meetings are usually scheduled, maybe monthly, and this can lead to lengthy delays with an approval that may be only a formality as it is being done in accordance with an approved process. Can LINZ proactively ask for a change to the legislation."

Response:

Noted, but outside the scope of the In-fill Guidelines.

Do you have any specific comments on 'generic requirements for road naming'?

General

Feedback

- "Nothing negative. This is clear and concise."
- "Understandable."

Response:

Noted with thanks.

(c) Ara and Te Ara

Feedback

- "Consistency dictates Maori names have their road type suffix. How else can people determine if it's a place or a road?"
- "Will use of 'Ara' confuse search engines such as Google, Council GeoMaps, etc"
- "p11 c) - I wonder if allowing Maori place names with Ara appearing first might be problematic when searching road names etc. Currently alphabetical listings of roads have the name first and therefore the roads appear in a predictable order, but if Ara or Te Ara appears first, it will make 'alphabetical listings inconsistent"

Response:

The Guidelines refer to current best practice for organisations to use now or when designing system upgrades.

Almost a dozen instances of the correct usage of Ara and Te Ara have already been added to the official record. These are located across the country; from Auckland to Southland.

(d) Appendix A

Feedback:

"except when using the above instance (C)"

Response:

Ara and Te Ara are included in Appendix A: of these guidelines.

(f) one name only

Feedback:

"f) reads a bit oddly"

Response:

This sentence has been re-ordered.

(g) road extension

Feedback:

"i.e. Smith Rd not Smith Rd ext"

Response:

Agreed – sentence amended.

(h) replication of existing road names

Feedback:

- "I don't agree with this comment. TAs need to tell developers to look outside of the box for names as they seem to be selecting from a limited list".
- "(h) this section needs to be quite specific as to what constitutes 'clearly geographically separated' as it is already difficult to enforce the need for uniqueness."
- "(h) - Duplication of street names should be allowed if the road type is different between towns/suburbs rather than an arbitrary as the crow flies distance from a similar name. Eg. Should be allowed to have a Church Street in Tuakau and a Church Road in Pokeno and a Church Parade/Crescent in Huntly and a Church Way/Lane in Ngaruawahia. It is not realistic to assume that a person will be confused thinking that Pokeno is Tuakau because Church (insert different road type) is similar. It is becoming increasingly difficult to assign road names due to the great number of private right of ways being necessarily named. Either this needs to be relaxed a little, or the amount of suffixes allowed should be increased past E (and F in the proposed change)."
- "In the Auckland region the pressure to accept similar or duplicate names is certainly growing. In this respect the idea of duplicates being permitted provided the roads are geographically separated is in the first instance supported.

However with reference to the emergency services, whether or not this is feasible may be influenced by how the call centres in the Auckland region currently operate in the event of an emergency. That is, if such calls were first logged through a central call centre, we think there may still be the potential for the locality of road names to be confused resulting in emergency units responding to the wrong address. In this regard it is noted that there are many existing duplicates of road names in the Auckland region where such confusion can currently occur, even though the duplicate names are located within different suburbs.”

Response:

A wider variety of names should be encouraged to enable addresses to be more readily and uniquely identified. However, flexibility is desirable in order to allow names to be chosen which are meaningful or significant in the locality.

Therefore guidance has been provided which tolerates some duplication, but aims to minimise the risk of confusion for providers of goods and services, emergency services and visitors.

No feedback on this point was received from emergency services.

Feedback:

“Councils require quicker consultation process and developers need to recognise they need to create roads if they have more than 4 houses off an access. Often this can be belated”

Response:

Early consultation and forward planning with a system view are encouraged in the Preface. The guidelines will be available at no cost from the LINZ website and it is hoped that developers will refer to them to get a better understanding of addressing aims and requirements.

The Standard implies that roads with more than 5 primary sites should always be named. The Guidelines offer some alternatives to this in particular circumstances.

(k) Length of road names

Feedback:

- Is there more definition around what might be considered to be a long name?
- Many TA’s have conventions that short street should have short names; and longer streets may have longer names. This convention is useful and sensible and needs to be widely enshrined within guidelines.

Response:

This is covered in the Standard. As in-fill developments typically only create short roads, the focus is on keeping the name short.

(q) "The"

Feedback:

"The' shall not be used for the first part of an English name eg The Avenue. Road name instead of English name?"

Response:

Explained in (c) re Ara and Te Ara.

(s) Characters to be used

Feedback:

- "On page 13 section (s), Where is says that "Macrons must be used...", can this be "Macrons should be used..."• . This recognises that it is easy to show a macron on a street sign, but if macrons are used in databases, it can make it very difficult to find an address. Some organisations may need to do significant changes to their software to avoid the problems experiences when system users may or may not be using macrons. Changes must be made, but in accordance with an achievable project plan for the changes."
- "how will searching functions in Landonline/Google/etc cope with road names which include special characters such as macrons. Most keyboards do not have these characters as standard, so a type A would need to be searched as equivalent to an Ā, etc."

Response:

The sentence has been reworded. The Guidelines refer to current best practice for organisations to use now or when planning system upgrades.

Feedback:

"macrons cant be used for other languages? i.e. René."

Response:

The macron is the only diacritical mark allowed by the Standard. Māori was recognised as an official language of New Zealand under the Maori Language Act 1987.

(t) Prefixes and suffixes

Feedback:

"another example? i.e. Maxwell Avenue West"

Response:

Accepted – sentence amended.

Feedback:

"On page 13, section 2, part (t), where it says "A road name should not include a prefix or suffix such as a qualifier or direction, eg Upper, New, North, South.", this should be

extended with "except as a temporary name while waiting for a segment of road to be constructed". As an example, McLintock Street North in Wellington. This will soon be physically connected to McLintock Street, so numbers allocated in anticipation of the two roads being joined. Without the "North", emergency service, etc, have a very long drive, if they go to the wrong segment. It allows minimal disruption when construction completed, as residential only need to stop using "North" and they will still be found if not updated immediately."

Response:

This suggestion has not been accepted. The situation described is relatively rare and should not be normalised in the Guidelines. In terms of the Standard, removal of 'North' from the name in the example would have to be considered as a change in name, which is not a trivial exercise.

Feedback

- "Potentially, the qualifier examples noted can be useful in differentiating between sections of roads/streets. eg: Upper High Street identifies the portion of a street at the higher end of the street. (Although it is acknowledged that this type of differentiation can be arbitrary.)"
- "In addition, there are existing examples of other prefix's in use, and road naming conventions that may be required to be continued. eg: In Akaroa, the prefix "Rue" ("street" in French) is widely used for the street naming to reflect the French heritage of the town."

Response:

These comments are out of scope i.e. not specifically related to in-fill.

Do you agree with all the proposed guidance on 'deciding whether to name a road'?

(c) – (e) roads with less than 6 primary sites

Feedback:

- "Page 13 part (c) Suggesting that roads that have more than five sites, should have names, is too restrictive. This should be changed to say more than 12 sites. Leave it to the Council to decide what needs a name, but they must always consider the primary aim of the addressing standard and the guidelines. There is nothing wrong with using any single letter as a suffix, provided they are assigned in a sequence and provided I, L and O are not used. They do not have to start at A, as it may need A reserved for a future development. Any single letter can be missed if needed later."
- "(c) - If there is the ability to assign F then the number of primary sites before a road should be named could be 6. Currently you can assign 2, 2A, 2B, 2C, 2D and 2E to properties (6 different numbers for 6 different sites). Allowing F may even allow for a 7th site."
- "In Scenario 2 (please refer to pic2a), we look at using conventional numbering and new road names. This doesn't work well as we need two road names, due to there

being two centrelines. Which then leads to numbers that do not follow a logical sequence from the perspective of the person on the ground, where what they see is that number 1 is next to number 4.”

- “(c) pg. 13. The proposed use of sub-addressing now provides greater clarity in being able to advise developers what the fall back position may be, if naming an existing private way in accordance with the standard, becomes problematic if there are existing owners / users. However it is noted that there may be some demand for this option recognising that the standard requires that a private road with six or more lots be named and that the use of letters up to only ‘F’ will only provide for the sixth lot.”
- “(e) pg. 13. While it may be desirable to still name roads with five or fewer primary sites because there is further development potential, there is currently no standard to trigger this requirement. The matter then becomes discretionary for both the TA and LINZ. The TA is in a position if it so desires, to impose a condition on the subdivision consent which would require a road name in this situation and this would provide some certainty to the developer as to what is or is not required to obtain titles.”
- “p13 e) - this all sounds quite discretionary (‘may need to be named’), which could leave to complaints or problems”

Response:

The paragraph remains as drafted but a new section relating to a T-shaped cul-de-sac has been inserted into the Guidelines. This guidance is to provide more flexibility, *recognising that decisions must be made on a case by case basis.*

Following the Standard or these Guidelines should enable addresses to be added to the official record without undue delay, as well as avoiding or minimising the need for renaming roads or renumbering sites in the future.

Do you agree with all the proposed guidance on 'road naming requirement in consents'?

Feedback:

“We understand that currently it is not possible to include in a resource consent that addressing requirements be met as one of the resource consent conditions. The process for both the developer and the council may be better served if this was not the case, and addressing conditions were able to be included in the consent. This is outside the scope of the Guidelines, however it is a point worth further debate.”

Response:

Outside the scope of the In-fill Guidelines, but this has been noted.

Feedback:

- “...a document that can be handed out to developers that clearly states what the addressing process is and clearly states what the responsibilities of both the developer and the council are for a successful addressing outcome. It would be very beneficial if this was included in the guidelines, and made accessible to the public and all councils. In this way consistency of advice would be achieved across all councils...”

definitely keen to see an "Addressing and Road Naming Advice to Developers" document be made available nationally."

- "It is acknowledged that this aspect may be outside of the scope of this consultation, however, a national guide or general standard for road naming would be potentially useful."

Response:

Noted. However, such a document is outside the scope of these guidelines, which are limited to in-fill development.

This work may be considered in the future. Until then, TAs are free to produce such a document for developers to access, using the *AS/NZS 4819: 2011 Rural and urban addressing* standard and their own policies. Several TAs have already done so, either by posting guidance on their own websites, or by providing notes with resource consents.

Please provide any additional feedback you have on Section 2 - Road Naming.

Feedback:

- "Once again thanks for undertaking to amend the guidelines in response to our concerns particularly around the naming of existing private roads."
- "Nice that it's clear where the guidance deviates from the Standard"

Response:

Noted with thanks.

Do you agree with all the proposed guidance in Section 3.2 - Use of suffixes?

Requirements for alphabetical suffixes

(a)

Feedback:

- "(a) We should make it crystal clear if we will allow past suffix F or not."
- "Suffixes should never exceed E"
- "Page 17 (a) as mentioned earlier, use any letter from A to Z except I, L and O."
- "(a) If there is no leniency for allowing more duplicate road naming, then a greater number of suffixes should be allowed. Eg to G"
- "That suffixes be allowed to extend from A to Z. In Scenario 3 (please refer to pic3) we look at using Suffixes to number the Subdivision. Under the proposed guidelines we would have to stop at 240F, however there are only 5 houses numbered by the time we have to stop at F, which leaves 4 houses unnumbered. Much better then to be able to go to 240J if required."

- "p17 a) - another example of a contradictory rule. "...suffixes ...should not extend beyond E." then "there may be circumstances where F would be reasonable". Why not just make it 'F' as a general rule then?"
- "As an aside, the numbering of the passages in this section is confusing: [see attached pic]
Section 3.1.e.iii states that numbers should "start with base numbers, before moving to alphabetical suffixes or sub-addressing", which I would take to mean that you would address with the base number as the first number in sequence, like so: [diagram included]
Section 3.2.a reinforces this earlier point, yet the diagrams that follow for points B and C seem to not follow this guideline (although b. does say that this could be used, which implies that the numbering officer should use their discretion):
Potentially this needs to be re-diagrammed or re-worded?"

Response:

Although the Standard should still be complied with as much as possible when allocating addresses for in-fill developments, the guidelines provide possible alternatives when the practical implications on the ground require an exception; *recognising that decisions must be made on a case by case basis.*

A new section relating to a T-shaped cul-de-sac has been inserted into the Guidelines, which will also provide an alternative option in some situations.

Following the Standard or these Guidelines should enable addresses to be added to the official record without undue delay, as well as avoiding or minimising the need for renaming roads or renumbering sites in the future.

(b)

Feedback:

- "Page 17 (b) This says that sub-addressing is preferred to using suffixes. This is wrong. First preference should always be whole numbers except when several separate tenancies all share the same door. In this case, displaying the whole number at the door is ideal and then have sub-addresses inside the building. Second preference should be a whole number plus a suffix. In the example, it would be better to have 17 and 17A rather than 17A and 17B. Third, if suffixes cannot be used, then consider sub-addresses."
- "The diagram is ambiguous. Appears to show 2 lots."
- "Item (b) page 17 Amend to:-

Alphabetical suffixes can be used for in-fill duplex/terraced units that are located on a primary site (see figure), although sub-addressing is preferred (see section 3.3). This is a variation to s 5.10.1 in the Standard, which implies that only sub-addressing may be used.

Reason

Better defines intent that this is for infill cases where there are multiple sites, within a primary addressable site."

Response:

Some of the suggested amendments have been included.

(d)

Feedback:

- "Appendix A: Road types for use within in-fill developments

I think it is great that we are giving the full road types list."

- "Appendix A: Road types for use within in-fill developments

- Show GLADE as being able to be used for also naming an open-ended roadway
- Add in RIDGE -

Reasons

Aligns these road types with the addressing standard section New Zealand applicable road types list. Glade may have been a mistake. Ridge could be very appropriate within some development sites."

Response:

The road types in Appendix A in the In-fill Guidelines are a subset of the road types available for New Zealand in the Standard. However, Ara and Te Ara have also been included as Māori is recognised as an official language of New Zealand under the Maori Language Act 1987. 'Ridge' is only available for Australia in the Standard. The error relating to 'Glade' has been corrected.

(e), (f)

Feedback:

- "We currently have issues where an existing address is changed. Homeowners are reluctant to change, and often just don't. There is also an issue with service providers who won't or seem unable to update their addresses. If the addresses are allowed to be out of order, could the front unit retain its existing address and the rear unit become A?"
- "3.2 (e) should have the option that the existing dwellings retains their current address and the in-fill dwellings are numbered 25A and 27A, it is always better to not re-number an existing dwelling if possible as it causes upheaval for the resident having to change their mailing address with a number of organizations like banks, insurance, phone, power, council and anywhere where they may have an account etc."
- "3.2 (f) figure 2 the back dwelling should be 27A and front 27B this would retain the sequence It is always better to keep numbers in sequence than jump backwards and forwards."
- "Page 18 (f) Where there is a site behind another, then it is wrong to suggest the one at the back should be B and the front one A. Ideally, numbers should be in sequence, sometimes an exception can be made for an old existing house, but leave

it to the discretion of the Council, after then consider the aim of the addressing standard.”

- “(f) I disagree that that the rear site should always be called B regardless of where the access is located. I think it is better to keep the numbers sequential where possible. In addition to this it is not uncommon to have further development and for example need to allocate the number 27C with the driveway located on the opposite side of 27A which would mean the sequence of numbers would be 27B, 27A, 27C in that order.”
- “(f) When people are driving down a dark road they are looking for numbers rather than houses (especially in a rural setting). They expect to see the numbers and prefixes to continue to ascend, the further along the road they get. Seeing an entranceway for 758B pop up before a 758A will create a lot more confusion with people thinking they must have passed it, or that 758A somehow shares the same entranceway as 758B. This is especially they case in situations where the next entranceway is a distance away from the first. In every other circumstance the first entranceway is numbered with the lowest number and first prefix. The next entranceways are then to be numbered in ascending order. Why have this one exception?”
- “Item (f) page 18
We disagree with this approach to varying the standard. This approach goes against the formats of:-
“Generic requirements for address numbering” (c) page 15
“Signage for site numbers” (a) on page 16

Reasons

This approach would lead to confusion as to what rules must be applied when the development proposal increases beyond just two sites to being addressed, as up to and including using F as an alphabetical suffixes are ok, as per (a) page 17.

We are already having complaints from owner at 1018C [redacted] Road where building supplier delivery vehicles are looking for 1018C down the driveway servicing 1018B, which is out of sequence as below, thus creating an issue due to previous non-conformity. [diagram attached]

This variance to a having a standard approach, just seems to be catering for a few developers not wanting to change their address, though they must deal with legal descriptions, titles, mortgages etc being changed. After all the developer has instituted the development event, generally to make a profit.”

- “(f) Figure 2 - where the back lot is ‘B’ but comes before the front lot which is ‘A’ - it is out of sequence! and I find this change difficult - when even other case is in sequence”

Response:

The feedback indicated a strong preference for sequential numbering. Therefore the wording in the Standard has been retained with minor amendments. An existing site

already using a base number on its own will be able to retain that number without a suffix provided it is in order.

Do you agree with all the proposed guidance in Section 3.3 - Use of sub-address numbering?

3.3 Use of Sub-address Numbering

Feedback:

- "That prefixes be allowed to be used for regular address numbering, ie: allow prefixes for sequentially numbering buildings that are located on separate parcels. And not just for unit numbers for numbering buildings on the same parcel.

In Scenario 1, (please refer to pic1a) we look at using Prefixes to number the subdivision. This works well as no new private road needs to be created, and the numbers are logically arranged and unambiguous, so anyone can understand the sequence. However it does not meet the current standard as prefixes are not allowed on separate parcels and clockwise numbering is not allowed. "

- "Sub-addressing for existing sites (a) - this will be beyond confusing. It would be much better to either allow a greater number of prefixes or allow a unit style of numbering to occur in these instances (when a private right of way or access way is being utilised). This will allow in-fill development to only change the numbers of the houses behind them. The first house to be known as 1/5, then 2/5 then 3/5. If 3/5 was to be split there are two options available - either to name the right of way or renumber the existing houses behind to be 5/5 and 6/5. Unit style numbering is effectively utilised in many other parts of the world. Unit style numbering makes even greater sense when the houses are small/sharing walls etc. Absolutely do not bring in the 1/5C option. This will be unbelievably confusing."
- "Page 20 (b) With terraced units, sub-addressing is only one option. It may be better to have whole addresses or use suffixes. Provided it works and they are easy to find. 27A is much easier to use rather than 1/27. 27A does not need any qualifier like unit or flat, etc. It is less likely to be wrongly read by machines."

Response

Although the Standard should still be complied with as much as possible when allocating addresses for in-fill developments, the guidelines provide possible alternatives when the practical implications on the ground require an exception; recognising that decisions must be made on a case by case basis.

Feedback:

- "3.3 Use of Sub-address numbering

Item (a) page 19

Amend to

The address number format for a sub-addressed site, shall consist of a numerical prefix, followed by the primary site number, and may also include a "purpose type" element prefix to further define the addressed site.

The address of Unit 1, 27 Sunset Lane (the first apartment at 27 Sunset Lane) may be formatted to any of the following schema using the full number, the sub-address number, and possibly the purpose type element as:-

- 1/27 Sunset Lane or
 - Apartment 1, 27 Sunset Lane
- "When to use sub-address numbering

Item (b) page 20

Amend to

Sub-addressing should also be used for duplex or terraced units (see figure below), that are not on separate primary location sites.

Reason

Clarification that primary site location addressing is different to sub- addressing within a primary site."

- "Item (c) page 19

Amend to

A sub-address shall not co-exist with a separate primary site that uses the same base number, i.e. a primary site allocated 21, cannot exist with a separate site allocated 1/21 being a subset of a different primary site.

Reason

To clarify that two separate primary sites are involved. "

Response

The suggested amendments have informed the changes that have been made.

Do you agree with all the proposed guidance in Section 3.4 - In-fill on multi-level developments?

Feedback:

- "Is there any merit in having the address and RCS2010 unique parcel identifier for Unit Title developments align?"

Response:

Out of scope. This is more relevant to the requirements for unit appellations in the Rules for Cadastral Survey. During the review of the Rules it has been proposed that unique parcel identifier formats for a unit provide for unit appellations to be consistent with unit addresses.

Feedback:

- “Page 22 – add (h) for a single building with one entrance, but two or more separate towers off one podium. “If one entrance to a single podium with 2 or more towers, then assign an address to the entrance. Assign numbers for each unit using the hotel-style numbering with unique numbers within each tower, but the numbers may be qualified with a prefix like E or W for east or west tower, if this makes it easier to locate units”.

Response:

Out of scope.

Feedback:

- Page 23 (c) Dual keys scenarios. The example should be changed to say 206/35 and 206A/35 or 206A/35 and 206B/35, depending on what will work best for the particular case. In many cases, there is a main unit that the investor may occupy and a smaller one that may be rented or used with the main one. They are likely to be a single rating unit and need a single address as the property address ie in this case 2016/35. The letterbox for the smaller unit, may not be used and may not be installed. The developer may insist that the main and smaller unit must share the same letterbox. (Wellington City is currently dealing with a case like this in Victoria St) It can be very confusing if they are assigned addresses on the assumption that they will always be used separately. It is easier if the whole number can be the default that can represent the two parts.”
- “Ground, Levels Parking can be identified with prefix e.g Level 1 unit 1 23 main st
L2/1 23 main

Response

Some of the suggested amendments have informed the changes that have been made.

Please provide any additional feedback you have on Section 3 - Address Numbering.

Feedback:

- “All proposals appear sound”
- “Generally OK”

Response:

Noted with thanks.

3.1(a)

Feedback:

“p15 a) - would it make more sense here to refer to titles rather than ‘separately owned or occupied’? Almost implies that if one person owns several adjacent properties they don’t need individual numbers. Could the word parcels be used?”

Response:

Suggestion not accepted. Several separately occupied sites on one title would all be numbered.

3.1(b)

Feedback:

" b) - for a through road it's not clear which is the entrance or beginning of the road, ditto for h) re odd/even numbers"

Response:

Through roads are unlikely to be common in an in-fill development.

3.1(c)

Feedback:

"Clarification of, or a definition of "point of access" would be useful as this is not clear. Does point of access mean the current physical access? Proposed access? Legal access/frontage?"

Also, what is meant by "seen from the road". It is possible that this the point where the property is first seen changes over time as landscape planting etc changes. "Seen" is subjective."

Response

Accepted – paragraph amended.

3.1(d)

Feedback:

- "This form is missing Section 3.1. Our comment for 3.1 is - On page 15 (d), where it says "main vehicular access point", the word vehicular should be removed. It is just the main access point, especially for emergency services. It does not have to be suitable for vehicles. It is likely to be the one used by visitors, mail delivery, etc."
- "Clause 3.1: addresses should be from the primary vehicular access where there are two or more frontages. In medium density developments we are seeing the front door facing the Street being only for pedestrian access and the vehicle access being by way of a rear lane. We believe in this case the address should be from the Street, not the Lane. People navigate according to the street name rather than the service lane."
- "Section 3.1 (d) page 15

Change the existing

"A site that has access from two roads should be given a number on the road where the main vehicular access point is located (e.g. for emergency service purposes)."

To

A site that has access from two roads should be given a main address number on the road where the primary property access is located. This usually is the front door and serves the purpose of emergency services first responder access, principle visitor and general delivery access. In addition to this main address, a primary site may be allocated one or more alternative addresses where it has more than one access point – including for onsite vehicle parking access.”

- “No question about 3.1? Signage for site numbers (d) sentence needs to be all together not spread over 2 pages.”

Response:

The suggested amendments have been included or have informed the changes that have been made.

3.1(g)

Feedback:

“Section 3.1 (g) page 15

Include a pragmatic solution as to how the following roadway form like Godwit Lane (the full “tee” area as per the included snip) type of roadway should be a named, and then have location addresses allocated. Currently we have these addressed with all odd up the straight section and to the left, and even up the right hand section and to the right, both ending opposite the lead in roadway section. We have an increasing number of these cases being presented for us to work with. [Diagram attached]”

Response:

A new section relating to a T-shaped cul-de-sac has been inserted into the Guidelines.

Feedback:

“Section 3.1 (g) & (h)

- That clockwise numbering be allowed for single entrance subdivisions.

In Scenario 5 (please refer to pic5) we look at an urban subdivision with 42 sections on it, that was built in two sections several years apart. This uses clockwise numbering with rear sections numbered sequentially. It is logical and unambiguous and has worked very well. It is however against the current rules to number clockwise, and with both odd and even numbers on the same side of the street.

Response:

The suggestion has not been accepted as it varies too far from the Standard, which should be complied with as much as possible when allocating addresses.

Feedback:

3.1 (l) "Some Auckland cul-de-sac's are named. We need to understand the length measurement 'very short'. should small cul-de-sacs have a new road name if we are able to allocate enough addresses with alpha's"

Response:

These questions have informed the changes that have been made.

Signage for site numbers (p16)

Feedback:

- "(a) agree. However, the enforcement of legible numbering and subsequent responsibility for maintenance of site numbering becomes an issue.

The flexibility for individual numbering styles and flair should not be overly restricted. This will become a local (TA) issue."

- "(c) Amend to:-

In the case of a sub-address site, the purpose type and the full number, consisting of both the sub-address number and the primary address number, should be displayed to avoid confusion between the two, e.g. Unit 26, 35 Main St should be displayed as "Unit 26, 35" or "Unit 26, 35 Main St", or "26/35" depending on the location of the sign and the available space."

Response:

The suggested amendments have informed the changes that have been made.

Do you have any further feedback that has not been covered by the previous questions?

Feedback

"Terms and definitions

Add in at least three more terms:-

Urban address – An area where the roadway speed limit is 60 kph maximum or lessor

Rural address – An area where the roadway speed limit exceeds 60 kph

Dual key - Dual key offices or apartments usually have a self-contained space, accessed by a separate lockable door, inside the main unit. A single common door provides access to the main unit from a common hallway.

Redefine the term for "In-fill subdivision" to along the lines of - To increase the density within existing urban developed areas."

Response

The definitions of 'dual key' and 'in-fill subdivision' have been informed by these suggestions. 'Urban' and 'rural' have not been defined as the Standard allows for flexibility.

Feedback

- "Feedback from my team has been positive on this."
- "Will address many of the initial concerns."
- "This is all academic and will in no way help councils and developers issues.

Developers could submit address layout to council during 223 and LINZ provide 224c approval to numbering as well as Council approving infrastructure?

This assumes LINZ and Councils have concept plans for the whole stage. Piecemeal numbering has caused issues. These addresses can be entered into the LDS the same time titles are issued. Councils can then just number corner addresses after access is known.

This would improve timeliness and quality."

- "A very good document that suits the standards expected by Fire and Emergency NZ"
- "Will be more helpful if LINZ make the changes we have recommended"
- "In general Some of the points are a bit vague or subjective - does there need to be a differentiation across the whole document between fixed/compulsory points and those that are looser and open to subjective assessment by the TA? (eg rule vs guideline, or guideline vs tip)"
- "having the final Guidelines available on the Linz website sounds like an excellent idea."
- "In principle, our strong preference is [to] have a standard that is fit for purpose. Any issues or local variances should be accommodated within the standard rather than the publication of guidance that may be perceived as at variance with the standard. That is, if there is a problem with the standard, fix the standard.

However, we do appreciate that there are real problems existing which are likely to continue as our urban centres respond to growth pressures. To resolve some of those issues we support the proposed guidance both in intent and detail noting the following feedback. [recorded in other questions]

In summary, we are of the view that the guidelines will be very helpful. We also note that the cost to maintain a full suite of standards is very expensive especially for small businesses. We encourage making standards and guidelines as accessible as practicable."

- "Tauranga City Council supports a unified approach to property location addressing, and these guidelines help with setting a base point all involved can use. Tauranga is one of the country's fastest developing areas and we are experiencing many of the

location addressing issues that this document provides guidance on. The document reinforces the overall approach that we as a Council have been following in recent times, so as a council we are in full support of this being finalised and released as early as possible.”

- “Firstly, great job on the new set of standards – they are very welcome! Keep up the good work, it is really appreciated by those of us in addressing!”
- “The document looks good. Napier City Council has already adopted these policies, but it’s still good to have them written.”
- “I have had a read through the document and don’t have any specific feedback. Nice to see you looking at those issues we are seeing more of with so much development throughout the country. I know here in Central Otago I am spending a lot of time on road naming reports and RAPID number requests.”
- “As I carry out all the address allocations I found the document very helpful. It is easy to read and understand, and the guidelines make sense. It also helps me for other departments to have this available and understand the issues.”