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FEEDBACK SUBMISSION::

Guidelines for Addressing In-fill Developments

To: ln-fill@linz.co.nz

This submission is on behalf of the *Institute of Cadastral Surveying (ICS)*.

The ICS is an organisation whose membership is actively engaged in cadastral surveying.

This response represents the views of ICS Members who have provided feedback to the ICS Secretary. The feedback is based on the experience and wisdom of our members whom are involved in the development of land. It is also submitted in the best interests of landowners and the public - our clients.

The feedback summary references the sections within the proposed Guideline document draft dated 14-May-2019.

- Where a consensus view was specifically noted by ICS members, this has been reported as “**ICS agree**”.
- Where there was no specific ICS member feedback for an item, this does not necessarily mean non-agreement – but is tacit approval.
- Where there was a specific ICS member comment or concern about an item, this has been reported as “**ICS comment**”.

In general, the ICS views the proposed Guideline as a useful tool for TA’s and Developers particularly, but will also be useful for Survey Consultants when advising Clients and Landowners of the legislation and standards applicable to Addressing.

We thank you for the opportunity to provide feedback on the Guidelines.

Institute of Cadastral Surveying

Brent George

Secretary

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Terms and definitions	
may	ICS agree with the clear definition of these terms
shall	
should	
multi-level building	ICS comment: Needs additional clarification - Is this intended to be "2 or more" OR more than 2 (=3+) levels?

Preface	
Introduction	
<p>d) These guidelines will also help developers better understand the addressing requirements. They may also be helpful for developers where the TA allows them to propose addresses and/or road names.</p>	<p>ICS Comment: Some members have specific issues with allocation of road names by Territorial Authorities (TA). There appears to be variable standards of flexibility throughout region and TA's as to how they manage and control the road naming process.</p> <p>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.</p>
<p>(e) The allocation of property numbers is dependent on, and required to be in terms of an associated road name. Therefore they are both included in these guidelines.</p>	ICS agree.
Purpose	
<p>(d) Some existing addresses inhibit the allocation of addresses for related in-fill developments due to historical reasons and/or because future development was not anticipated. In these situations, road naming or renumbering in existing address schemes may be required to enable official recognition of new in-fill development addresses.</p>	<p>ICS Comment: Any road (re)naming or renumbering would require thorough communication and consultation with all affected parties.</p>
Planning for In-fill Subdivision	
<p>(f) The process for numbering and naming should be commenced as early</p>	ICS agree.

<p>as possible, as this can take significant time if new road naming or renumbering is necessary. Consultation with third parties such as the TA, owners of neighbouring sites, or iwi is often required.</p>	
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1. Address Information	
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<p>What is an address?</p>	<p>ICS agree that address information should be well structured, accurate, and consistent.</p>
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2. Road Naming	
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Generic requirements for road naming	
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<p>(h) The name of a road for a new development should not replicate an existing name in the territorial authority district. However where the district has few unique names still available, a name may be duplicated provided the roads are clearly geographically separated (eg Mangere from North Shore). This is a deliberate variation to the provision in s 4.4.7 of the Standard which does not allow duplicate names within a TA.</p>	<p>ICS agree.</p>
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<p>(i) Road names should not be duplicated and distinguished only by type eg a Smith Lane that connects to a Smith Street is not acceptable.</p>	<p>ICS agree.</p>
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<p>(k) Road names should not be long.</p>	<p>ICS agree. 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.</p>
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<p>(t) A road name should not include a prefix or suffix such as a qualifier or direction, eg Upper, New, North, South.</p>	<p>ICS comments: 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</p>
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	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.
Deciding whether to name a road	
(a) Generally speaking, formed roads that are open to the public or to emergency and public utility services should be named.	ICS agree.
(b) TAs have the power to name roads, including private roads that are intended for the use of the public generally (see TA’s authority to allocate addresses above).	ICS Comment: We have noted above member comments regarding issues with TA road naming processes. 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.
Road name signage	
(d) Signage for road names on private land does not mean that the TA is claiming ownership of or accepting responsibility for that road. Adding the term ‘private road’ to road signage may be useful in this case.	ICS agree with the adding of the term “private road” to road signage.

3. Address Numbering	
3.1 Generic address numbering requirements	
Generic requirements for address numbering	
(c) Address numbers should be allocated according to the location of the point of access to the site; i.e. numbering should start at the point where the site is first seen from the road.	ICS Comments: 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 be “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.
(f) (iv) allocated out of sequence or in any other illogical or ambiguous manner, in order to satisfy the preferences of a developer or address holder (eg for reasons of superstition or prestige).	ICS agree.

(i) Numbering should follow the prevailing direction of existing numbering.	ICS agree.
(j) It is helpful for locating sites if odd numbers fall roughly opposite similar even numbers, ie number 5 should be roughly opposite number 6. Numbers may be skipped to achieve this alignment.	ICS agree.
Reserving numbers for future developments	
(a) Where there are no sites on a part of a road, including the start of the road, then numbers may be skipped. This allows for the possibility of future in-fill and can also help ensure numbers on opposite sides of the road are roughly similar.	ICS agree.
Signage for site numbers	
(a) An allocated property number shall be placed and displayed to plainly identify the applicable site, so that the number is unambiguous and clearly legible from where the site would normally be accessed.	ICS 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.
3.2 Use of Suffixes	
Requirements for alphabetical suffixes	
(c) The physical order of suffixes should be in the same direction as the base numbering on the road	ICS agree.
(d) The suffixes shall be allocated to every site that uses the base number (see figure below). However, an existing site already using the base number on its own may retain that number provided it is in order.	ICS agree.
(e) Where the base number is out of order a suffix shall be allocated. In the figure below suffix B is added to existing 27.	ICS agree.
(f) Where there is a front and rear site, the front site should be allocated A,	ICS agree.

<p>and the rear site B. The rear site should be allocated B even though this may be out of sequence using the access points on the road frontage (see figure 2 below). This is a variation to s 5.4.8 in the Standard.</p>	
<p>3.3 Use of Sub-address Numbering</p>	
<p>Generic Requirements for sub-address numbering</p>	
<p>(a) The address number for a sub-address site shall consist of a numerical prefix, followed by the primary site number separated by a '/' symbol, eg 1/27 Sunset Lane (the first apartment at 27 Sunset Lane) or 2/21B Smith Street.</p>	<p>ICS agree.</p>
<p>(c) A sub-address should not co-exist with a separate primary site that uses the same base number, ie. A site allocated 21 cannot exist with a separate site allocated 1/21.</p>	<p>ICS agree.</p>
<p>When to use sub-address numbering</p>	
<p>(a) Sub-address numbering should be used where a site is contained within a larger primary site (eg dwellings or offices contained within a larger building).</p>	<p>ICS agree.</p>
<p>(b) Sub-addressing should also be used for duplex or terraced units.</p>	<p>ICS agree.</p>
<p>Sub-addressing for existing sites</p>	
<p>(a) Sub-addressing numbering may also be used in conjunction with alphabetical suffixes when all available primary site numbers and allowable alphabetical suffixes have been allocated. Sub-addressing must only be used in this situation if there is no possibility of further in-fill that would result in conflict with the addressing guidelines.</p>	<p>ICS agree.</p>
<p>3.4 In-fill on Multi-level Developments</p>	
<p>Generic requirements for numbering multi-level building</p>	

(e) The full address of the unit should consist of the sub-address number (eg 206) and the primary address (eg 35 Pounamu Drive) – 206/35 Pounamu Drive.

ICS agree.

End.