

I hereby give notice that a confidential meeting of the Planning Committee will be held on:

Date: Thursday, 6 May 2021
Time: 10.00am
Meeting Room: Reception Lounge
Venue: Auckland Town Hall
301-305 Queen Street
Auckland

Kōmiti Whakarite Mahere / Planning Committee

CONFIDENTIAL AGENDA

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Auckland Unitary Plan - Plan Change 26 - Clarifying the Relationship Between the Special Character Areas Overlay and Underlying Zone Provisions - Appeals

File No.: CP2021/04489

Item C1

Matatapuanga Confidentiality

Reason:	The public conduct of the part of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists under section 7.
Interests:	s7(2)(g) - The withholding of the information is necessary to maintain legal professional privilege. s7(2)(i) - The withholding of the information is necessary to enable the local authority to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations). In particular, the report contains a recommendation on the council's approach to the appeals received on Plan Change 26.
Grounds:	s48(1)(a) The public conduct of the part of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists under section 7.

Te take mō te pūrongo Purpose of the report

1. To update the Planning Committee on the appeals received in relation to Plan Change 26 - Clarifying the Relationship Between the Special Character Areas Overlay and Underlying Zone Provisions.
2. To identify the options for addressing the appeals and the advantages and disadvantages of each option.
3. To seek approval to withdraw Plan Change 26.

Whakarāpopototanga matua Executive summary

4. In 2017, the council encountered challenges to its interpretation and administration of the Special Character Areas (SCA) overlay in relation to the Single House zone. These challenges were in the form of verbal and written complaints, and in one example, an application for judicial review initiated by neighbours to a development site. The appellants claimed the council was incorrectly administering the Auckland Unitary Plan (AUP), which had resulted in them not being considered an affected party. In response to this issue, and an associated declaration by the Environment Court, the council-initiated Plan Change 26 (PC26).

5. PC 26 sought to clarify the relationship between the SCA overlay and the underlying zone provisions that apply to properties within the SCA overlay. In particular, the plan change sought to make it clear that the development standards for certain activities in the SCA overlay “prevail over” or replace the equivalent standards for those activities in the underlying zones. This was in response to the declaration by the Environment Court that all relevant SCA overlay – Residential (SCAR), underlying Single House zone (SHZ) and General Rules (and any relevant objectives and policies), apply to the processing and determination of resource consent applications for any activity, without the SCA overlay rules prevailing or cancelling out other rules.
6. PC26 was publicly notified on 30 May 2019 and was heard by independent hearing commissioners. The decision was publicly notified, and all submitters/further submitters notified on 28 January 2021.
7. In their decision, the commissioners found:
 - There is no obvious conflict between the SCA overlay and SHZ objectives – they manage the same physical resources (land and buildings) but for two different reasons;
 - The AUP is operating as intended, with the SCA overlay and the underlying zone provisions working together in an integrated manner to achieve multiple development aspirations and outcomes;
 - There is no permitted baseline in the SCA overlay because development is not permitted and all relevant rules must be considered on each application;
 - All development activities in the SCA overlay require resource consent, regardless of compliance with the standards in either the SCA overlay or the underlying zone, and there has been a misunderstanding of the role of development standards in assessments; There is therefore no need to recraft the provisions of the AUP in the manner proposed by PC26;
 - Providing some clarity to plan users in relation to the standards is however appropriate and the opportunity provided by PC26 to do that should be used;
 - This is achieved by a simple provision identifying that in cases of different development standards applying to the same activity, those in the SCA overlay “take precedence over” those in the underlying zone in terms of the assessment, although both standards still apply;
 - A different approach to fences is warranted for front fences and corner sites – this is because such sites have two front boundaries presenting two facades to the adjacent streets.
8. The decision significantly strips back much of the notified plan change. What remains is a directive to “give precedence” or greater weight to the SCA overlay in all cases regardless of the context. This differs from how all other overlays in the Auckland Unitary Plan function. It also differs from the intent of PC26 which was more nuanced. In line with the Environment Court declaration, the council’s current approach is to consider resource consent applications under both the SCA overlay and the underlying zone provisions, and to determine the weight given to the SCA overlay versus the underlying zone on a case-by-case basis having regard to the local context. This is proving to be not as onerous as first thought, when the plan change was prepared and publicly notified.
9. Having carefully evaluated the decision, it is considered that the amended version of the plan change provides limited improvements to the AUP, and in some respects could result in poorer outcomes than the pre-plan change provisions.
10. Four appeals were originally received against the decision. One, by Ascot Hospitals and Clinics has subsequently been withdrawn.

11. The three remaining appeals are from:
 - Kāinga Ora (seeking that PC26 be declined and all consequential amendments be made to PC26 or to any other provisions of the Auckland Unitary Plan, including any necessary amendments to any planning maps, to respond to the concerns set out in the notice of appeal or in the attached submissions)
 - St. Mary's Bay Association (seeking an assessment criterion be added to ensure that consideration is given to the space between buildings to ensure that repair, maintenance and painting of the buildings is physically possible)
 - Somersby Trust (seeking that the D18.6.1.3 Yards standard be amended to include a specific requirement for a 10m minimum rear yard setback for those sites within the SCA Overlay: Isthmus B2 which adjoin Cornwall Park and its Open Space zones).
12. In addition, there are seven section 274 notices, with five of these opposing the relief sought by Kāinga Ora.
13. The options available to council to address the appeals are to:
 - Settle some or all of the appeals through mediation and subsequent consent order(s) and proceed to a hearing on any outstanding matters;
 - Seek a strike out of Kāinga Ora's appeal in relation to the extent of the SCA overlay and underlying zoning of land on the basis that it is out of scope;
 - Defend all or part of the plan change decision (subject to the previous two options);
 - Withdraw the plan change. This must occur before an Environment Court hearing commences.
14. There are advantages and disadvantages associated with each option. These have been considered against the following matters:
 - The ability to achieve the outcomes sought by the council in respect of special character values
 - Consistency with the way other overlays in the AUP function
 - The degree of professional support for the decision amongst council planning staff
 - Any potential risks, including reputational risks and risks to the current spatial extent of the SCA overlay and the type of underlying zone.
15. Withdrawing the plan change best achieves the outcomes sought for special character values. It means that the SCA overlay will function in the same manner as all other overlays in the AUP. This approach is supported by the council's resource consents and policy planning staff (as compared to the approach in the decision version of PC 26). It is also more appropriate and efficient to consider the extent of the SCA overlay and the underlying zoning of the land in a comprehensive and integrated way as part of the work programme for implementing the National Policy Statement on Urban Development 2020. The appeal by Kāinga Ora puts this approach at risk.
16. There are some reputational risks involved with the withdrawal, but these can be managed by clear communication of the reasons for the council's decision. There is also the ability for appellants to seek costs on the withdrawal, but that option also exists with an Environment Court hearing and can be managed by withdrawing PC26 at an early stage prior to mediation and before the other parties incur the costs of evidence preparation.

Ngā tūtohunga Recommendation/s

That the Planning Committee:

- a) withdraw Plan Change 26 - Clarifying the Relationship Between the Special Character Areas Overlay and Underlying Zone Provisions under clause 8D of the First Schedule of the Resource Management Act 1991 (RMA) for the following reasons:
 - i) overall, the decision version of Plan Change 26 does not achieve better outcomes than can be achieved without the plan change;
 - ii) the resource consent process efficiencies gained by clarifying which provisions have greater weight are outweighed by the outcomes that could result if greater weight is always afforded to the Special Character Areas overlay provisions;
 - iii) the council's resource consent practice was adjusted after the *Budden* Environment Court declaration and the approach adopted is proving to be not as onerous for both applicants and the council as first thought, when the plan change was prepared and publicly notified;
 - iv) the appeals are unlikely to be resolved without proceeding to a hearing. Costs would be incurred in defending the decision on Plan Change 26, which is an inefficient use of resources given the decision does not achieve better outcomes; and
 - v) Kāinga Ora's appeal raises issues regarding the relevance of the National Policy Statement on Urban Development to the geographical extent of the Special Character Areas overlay. It is far more appropriate to deal with the extent of the Special Character Areas overlay and underlying zones in a comprehensive and integrated manner as part of implementing the National Policy Statement on Urban Development than through the Plan Change 26 appeal process.

Restatement

- b) agree that the agenda report should remain confidential, and that the resolutions remain confidential until all the appeals on Plan Change 26 are resolved.

Horopaki Context

Background

17. In 2017, the council encountered challenges to its interpretation and administration of the Special Character Areas (SCA) overlay in relation to the Single House zone. These challenges were in the form of verbal and written complaints, and in one example, an application for judicial review initiated by neighbours to a development site. The appellants claimed the council was incorrectly administering the Auckland Unitary Plan, which had resulted in them not being considered an affected party.
18. In response to this uncertainty between the council, resource consent applicants and potentially affected parties, council filed an application for declaration with the Environment Court with the intention that the declarations sought would provide useful ongoing guidance to all parties.
19. The Court's decisions on the declaration proceedings determined that the provisions of the SCA overlay did not act as a "replacement package", prevailing over the provisions of the underlying Single House zone zone. Rather, that all provisions (objectives, policies and rules) relevant to an activity must be applied.

Proposed Plan Change 26

20. Plan Change 26 (PC 26) proposed a series of amendments to the AUP, and was, in part, a response to the Environment Court's declarations in respect of *Auckland Council v Budden*¹ regarding the relationship between the SCA overlay and the Single House zone.
21. There are a number of instances where there are equivalent provisions (activities and standards) in both the SCA overlay and the underlying zones, which was resulting in conflict and inconsistency between each set of (zone and overlay) provisions. This was causing uncertainty and unnecessary complexity in terms of processing resource consent applications; and most fundamentally meant the SCA overlay was not achieving its objectives. The council did however respond quickly to the *Budden* declaration and it became accepted practice to assess both the SCA overlay and the underlying zone provisions.
22. PC26 sought to clarify that where there are corresponding provisions (including activities and standards) in the SCA overlay and in the underlying zone, the provision in the SCA overlay will "prevail over" or replace the corresponding provision in the underlying zone. The council was also seeking to refine some of the standards within the SCA overlay, including height in relation to boundary, yards, paved areas and fences.
23. PC26 was publicly notified on 30 May 2019. 274 submissions were received and 23 further submissions. Broadly, there were an equal number of submissions in support and opposition to the proposed plan change. The hearing by independent commissioners took place on 24 and 28 July 2020. Various site visits were undertaken by the commissioners during July 2020 and the decision was released on 28 January 2021.

Decision by the Independent Hearing Commissioners

24. The commissioners found:
 - There is no obvious conflict between the SCA overlay and Single House zone objectives – they manage the same physical resources (land and buildings) but for two different reasons;
 - The AUP is operating as intended, with the SCA overlay and the underlying zone provisions working together in an integrated manner to achieve multiple development aspirations and outcomes;
 - There is no permitted baseline in the SCA overlay because development is not permitted and all relevant rules must be considered on each application;
 - All development activities in the SCA overlay require resource consent, regardless of compliance with the standards in either the SCA overlay or the underlying zone, and there has been a misunderstanding of the role of development standards in assessments; There is therefore no need to recraft the provisions of the AUP in the manner proposed by PC26;
 - Providing some clarity to plan users in relation to the standards is however appropriate and the opportunity provided by PC26 to do that should be used;
 - This is achieved by a simple provision identifying that in cases of different development standards applying to the same activity, those in the SCA overlay take "precedence over" those in the underlying zone in terms of the assessment, although both standards still apply;
 - A different approach to fences is warranted for front fences and corner sites – this is because such sites have two front boundaries presenting two facades to the adjacent streets.

¹ *Auckland Council v Budden* [2017] NZEnvC 209 ('interim decision') issued 19 December 2017. The decision was further clarified in the Court's second interim decision issued on 23 January 2018 as *Auckland Council v Budden* (No 2) [2018] NZEnvC 003 ('second decision') and in the third decision issued on 15 March 2018 *Auckland Council v Budden* (No 3) [2018] NZEnvC 030 ('third decision').

25. As a result of the decision, much of the PC26 proposed wording was rejected.

The Appeals and Section 274 Notices

26. Four appeals were originally received against the decision. One, by Ascot Hospital and Clinics has subsequently been withdrawn.

27. The three remaining appeals are from:

- Kāinga Ora - seeking that PC26 be declined and all consequential amendments be made to PC26 or to any other provisions of the Auckland Unitary Plan, including any necessary amendments to any planning maps, to respond to the concerns set out in the notice of appeal or in the attached submissions.
- St. Mary's Bay Association - seeking an assessment criterion be added to ensure that consideration is given to the space between buildings to ensure that repair, maintenance and painting of the buildings is physically possible.
- Somersby Trust - seeking that the D18.6.1.3 Yards standard be amended to include a specific requirement for a 10m minimum rear yard setback for those sites within the SCA Overlay: Isthmus B2 which adjoin Cornwall Park and its Open Space zones.

28. There are eight section 274 notices, although one of these is no longer applicable as it relates to the withdrawn Ascot Hospital and Clinics Limited's appeal.

29. The section 274 notices are:

- P. Ng on Kāinga Ora (opposes relief sought)
- Sampson Corporation Ltd and Sterling Nominees Ltd on Kāinga Ora (opposes relief sought)
- South Epsom Planning Group on Kāinga Ora (opposes relief sought)
- K. Vernon on Kāinga Ora (opposes relief sought)
- R.L. Donaldson on Kāinga Ora (opposes relief sought)
- Kāinga Ora on St Mary's Bay Association (opposes relief sought)
- Kāinga Ora on Somersby Trust (opposes relief sought)
- Kāinga Ora on Ascot Hospital and Clinics Limited (this section 274 notice is no longer applicable as the appeal has been withdrawn).

30. The appeals and section 274 notices are available on Auckland Unitary Plan pages of the Auckland Council website (under Auckland Unitary Plan changes, etc – PC 26).

31. The council has indicated to the Environment Court that it is willing to participate in court assisted mediation. That is typically the council's position on appeals. A date for mediation is currently being investigated by the court.

Tātaritanga me ngā tohutohu Analysis and advice

Options Available in Respect of the Appeals

32. The council has the following options available in respect of the appeals:

1. Settle some or all of the appeals through mediation and subsequent consent order(s) and proceed to a hearing on any outstanding matters.
2. Seek a strike out of Kāinga Ora's appeal in relation to the extent of the SCA overlay and the underlying zoning of land on the basis that it is out of scope.
3. Defend all or part of the plan change decision (subject to 1 and 2 above).
4. Withdraw the plan change. Council should have resource management reasons in support of the withdrawal of PC26.

33. Clause 8D of the First Schedule to the RMA enables a council to withdraw a plan change:
- (1) Where a local authority has initiated the preparation of a policy statement or plan, the local authority may withdraw its proposal to prepare, change, or vary the policy statement or plan at any time—*
- (a) if an appeal has not been made to the Environment Court under [clause 14](#), or the appeal has been withdrawn, before the policy statement or plan is approved by the local authority; or*
- (b) if an appeal has been made to the Environment Court, before the Environment Court hearing commences.*
- (2) The local authority shall give public notice of any withdrawal under subclause (1), including the reasons for the withdrawal*
34. The resource management advantages and disadvantages associated with each of the above options are set out in **Attachment A**.
35. The relief sought by Kāinga Ora includes consequential amendments to PC26 or to any other provisions of the AUP, including any necessary amendment to any planning maps to respond to the concerns set out in the appeal. Kāinga Ora's relief could force the council to prematurely reassess the extent of the SCA overlay and the underlying zoning of the land well in advance of its work on the National Policy Statement on Urban Development. A worst-case scenario is that the court could adopt Kāinga Ora's zoning and overlay maps. It is far more appropriate to review the extent of the SCA overlay and underlying zones as part of the work programme for the National Policy Statement on Urban Development and investigating any changes in a comprehensive and integrated manner.
36. Having considered the advantages and disadvantages of each option, including the risk associated with the appeal by Kāinga Ora, it is recommended that option 4 is taken and PC26 is withdrawn ahead of any mediation or Environment Court hearing.
37. While there is a risk of an application for judicial review in the High Court of a decision to withdraw PC26, there are sound resource management grounds for the proposed withdrawal.
38. Lessons learnt from the PC26 process can be factored into the National Policy Statement on Urban Development work, the future review of the SCA overlay and underlying zone and future plan changes in general. The independent commissioners' decision did have useful observations on the preparation of section 32 reports.

Tauākī whakaaweawe āhuarangi Climate impact statement

39. The resolution of any appeals and/or the withdrawal of the plan change is neutral in terms of climate impacts.
40. It is also noted that at present s70A of the Resource Management Act 1991 (RMA) specifically prohibits Auckland Council from making rules in the Auckland Unitary Plan regarding or considering the climate change effects of any greenhouse gas emissions.
41. The RMA Amendment Act 2020 will alter assessments of environmental effects for applications considered after 31 December 2021. This is the date from which s70A of the RMA shall be repealed, requiring a consideration of climate change effects from the discharges of greenhouse gases.
42. As this matter has been decided on prior to 31 December 2021, s70A still applies and therefore the Auckland Unitary Plan cannot contain rules considering the climate change effects from any greenhouse gas emissions.

Ngā whakaaweawe me ngā tirohanga a te rōpū Kaunihera Council group impacts and views

43. Staff within the council's Resource Consents department have been consulted on the options for resolving the PC26 appeals. They support the withdrawal of PC26. Resource consents staff already assess proposals under both the SCA overlay and the underlying zone. The weighting afforded to either the overlay or the underlying zone is assessed on a case-by-case basis having regard to the context. This is proving to be not as onerous as first thought, when the plan change was prepared and publicly notified.
44. PC 26 does not affect the functions and responsibilities of the Council Controlled Organisations.

Ngā whakaaweawe ā-rohe me ngā tirohanga a te poari ā-rohe Local impacts and local board views

45. Local board views were obtained on PC26 during its preparation. These views formed part of the Section 42a hearing report. Given the time constraints, local board views have not been sought on the options for addressing the appeals and the recommended option. However, nothing in the feedback from local boards to date would suggest a preference for any of the alternative options to withdrawing the plan change.

Tauākī whakaaweawe Māori Māori impact statement

46. All iwi were consulted during the preparation of the plan change. No submissions were received from iwi on the plan change. The technical changes sought through the PC 26 appeals are neutral in terms of their impact on Māori.
47. Reviewing the geographic extent of the SCA overlay and underlying zones (as sought by Kāinga Ora) will be of strong interest to Māori. However, the opportunity for Māori to be involved in any such review does not exist as part of the PC 26 appeals process. The opportunity will exist through the council's work on the National Policy Statement on Urban Development.

Ngā ritenga ā-pūtea Financial implications

48. Withdrawal of PC26 at this stage will reduce any further costs associated with the plan change. If the council was to proceed to mediation and an Environment Court hearing, additional costs would be incurred. These would include the costs of expert witnesses and legal representation. Successful appellants could also possibly seek costs (although the Environment Court's Practice Note 2014 indicates that costs are not normally awarded to any party in respect of plan appeals that proceed to a hearing).
49. As a result of the withdrawal of the plan change, appellants may seek costs. The most significant issues have been raised by Kāinga Ora. The primary relief sought by Kāinga Ora is that PC26 be declined. The withdrawal of the plan change effectively meets this relief.
50. If an early decision is made to withdraw the plan change, appellants and the council would not have gone through the expense of attending mediation and preparing evidence.

Ngā raru tūpono me ngā whakamaurutanga Risks and mitigations

51. There is no risk to achieving the outcomes sought by the SCA overlay if the option to withdraw the plan change is chosen. The council already assesses proposals under both the SCA overlay and the underlying zone. The weighting afforded to either the overlay or the underlying zone is assessed on a case-by-case basis having regard to the context.
52. A greater risk is reputational and the perception that council has “given up” on the management of special character values. This may arise as a result of the community not fully understanding what outcomes will result from the decision versus the situation prior to the plan change. This risk can be mitigated by good communications at the time of the withdrawal of the plan change.
53. By proceeding with the Plan Change, there is a risk of an unfavourable decision from the Environment Court. This is particularly significant in respect of Kāinga Ora’s appeal.

Ngā koringa ā-muri Next steps

54. The process for withdrawing the plan change is set out in clause 8D of the First schedule of the RMA. Under that section, “*the local authority shall give public notice of any withdrawal under subclause (1), including the reasons for the withdrawal*”.
55. If the council resolves to withdraw the plan change, council’s legal advisors will immediately advise the court, the appellants and section 274 parties of its decision to do so.

Ngā tāpirihanga Attachments

No.	Title	Page
A	Plan Change 26 - Appeal Options	13

Ngā kaihaina Signatories

Author	Tony Reidy - Team Leader Planning
Authorisers	John Duguid - General Manager - Plans and Places Megan Tyler - Chief of Strategy

Plan Change 26 – Appeal Options

Option	Advantages	Disadvantages
1 – Mediation and potential settlement	The issues in contention can be narrowed, reducing the length and cost of any hearing.	<p>Auckland Council officers and Kāinga Ora representatives have a fundamental philosophical difference on the interrelationship between the SCA overlay and underlying zone which is unlikely to be resolved through mediation. Kāinga Ora’s relief could force the council to prematurely reassess the extent of the SCA overlay and the underlying zoning of the land well in advance of the work programme for the NPS: UD.</p> <p>Council officers do not support the relief sought by the Somersby Trust. There is no rationale for a 10m rear yard adjacent to Cornwall Park. A yard of this depth did not apply under the legacy Auckland City Isthmus District Plan.</p> <p>The relief sought by St. Marys Bay Association is already addressed in a general sense in the existing matters of discretion and assessment criteria. These include the effects on the streetscape and special character context. The space between building when viewed from the street is part of the streetscape.</p>

Item C1

Attachment A

		Time and costs would be incurred for mediation which may not be successful.
2 – Seek a strike out of KO’s appeal in relation to the extent of the SCAR Overlay and underlying zoning of land	If successful, a strike out would remove a potential threat to the current spatial extent of the SCAR overlay and the type of underlying zone and council’s work on the NPS: UD.	Council’s legal advice is that the court may want to hear all the evidence before ruling on any strike out/issues of scope. There is a risk a strike out application would be unsuccessful and unnecessary costs may have been incurred.
3 - Defend all or part of the plan change decision (subject to 1 and 2 above);	Enhances council’s reputation as a “defender” of special character values.	<p>Council officers do not support the independent hearing commissioners decision.</p> <p>Costs could be incurred in defending a decision that does not achieve better outcomes than would be achieved without the plan change, which is an inefficient use of resources.</p> <p>By proceeding to an Environment Court hearing, there is a risk of an unfavourable decision in respect of any of the relief sought, including pre-empting outcomes of the work programme for the implementation of the NPS: UD. It is far more appropriate to deal with the extent of the SCA overlay and underlying zones in a comprehensive and integrated manner as part of the NPS: UD workstream.</p>
4 - Withdraw the plan change	Council officers do not support the independent hearing commissioners’	Reputational risk – this may arise as a result of the community not fully

	<p>decision which has effectively stripped the majority of the proposed changes out of the plan change.</p> <p>The decision does not achieve better outcomes than would be achieved without the plan change. It places greater weight on the SCA overlay in all cases regardless of the context. This differs from how all other overlays in the AUP(OP) function. It also differs from the intent of PC26.</p> <p>The resource consent process efficiencies gained by clarifying which provisions have greater weight are outweighed by the perverse outcomes that could result.</p> <p>Resource consents already assess proposals under both the SCA overlay and the underlying zone. The weighting afforded to either the overlay or the underlying zone is assessed on a case-by-case basis having regard to the context. This is proving to be not as onerous as first thought, when the plan change was prepared and publicly notified.</p> <p>There is a risk that proceeding with PC26 could pre-empt council's implementation of the NPS: UD. Given the current status of that work programme it is</p>	<p>understanding what outcomes will result from the decision v the situation prior to the plan change.</p> <p>Application for costs (particularly if the plan change is withdrawn after the parties start to incur costs for evidence preparation).</p> <p>There is a risk that the council's decision to withdraw the plan change could be the subject of an application for judicial review in the High Court. However, the risks of litigation can be mitigated by ensuring the council has resource management reasons for the withdrawal. Council officers also consider Kāinga Ora would be the party most likely to bring an application for judicial review and Kāinga Ora seeks that the plan change is declined so the withdrawal effectively grants the relief it seeks.</p>
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Item C1

Attachment A

	more appropriate and efficient to consider the extent of the SCA overlay and the underlying zoning of the land in a comprehensive and integrated way as part of the implementation of the NPS: UD.	
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