



Proposed Plan Change 120: Housing Intensification and Resilience (PC120) to the Auckland Unitary Plan (Operative in part)

Section 32 of the Resource Management Act 1991

**CONSULTATION AND ENGAGEMENT ON A PLAN CHANGE TO REPLACE
PROPOSED PLAN CHANGE 78 - INTENSIFICATION**

SUMMARY REPORT

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ATTACHMENTS

Attachment 1 - Letter from Minister Hon Chris Bishop to Mayor Wayne Brown 12 March 2025

Attachment 2 - Auckland Council Policy and Planning Committee extraordinary meeting 21 August 2025 Open Agenda report CP2025/17977

Attachment 3 - Auckland Council Policy and Planning Committee extraordinary meeting 21 August 2025 Open Minutes

Attachment 4 - Auckland Council Policy and Planning Committee extraordinary meeting 24 September 2025 Open Agenda

Attachment 5 - Auckland Council Policy and Planning Committee extraordinary meeting 24 September 2025 Open Minutes

Attachment 6 - Auckland Council local board business meetings 26 August to 4 September 2025 generic report to 19 local boards authorised 15 August 2025

Attachment 7 - Auckland Council Governance and Engagement Department report 'Auckland Unitary Plan - Local board views on the withdrawal in part of Proposed Plan Change - Intensification and draft replacement plan change' September 2025 with resolutions from 19 local board business and extraordinary meetings 26 August to 4 September 2025

Attachment 8 - Summary and themes of local board views (meeting resolutions from business and extraordinary meetings 26 August to 4 September 2025) on the withdrawal in part of Proposed Plan Change - Intensification and draft replacement plan change' September 2025

Attachment 9 - Presentation slides on local board views, delivered by Planning and Resource Consents staff to Policy and Planning Committee workshop on 10 September 2025

Attachment 10 - Letter from Ministry of Education 'Feedback on draft replacement plan change to replace Proposed Plan Change 78' 5 September 2025

1. Preamble

- 1.1 Preparation of a plan change to the Auckland Unitary Plan Operative in part (AUP) to potentially replace Proposed Plan Change 78 – Intensification (Plan Change 78), now known as Proposed Plan Change 120 – Housing Intensification and Resilience, began in March 2025.
- 1.2 The purpose of the replacement plan change is to introduce to the AUP:
 - measures to better manage significant risks from natural hazards region-wide;
 - an amended approach to managing housing growth as a result of no longer incorporating the medium density residential standards (MDRS) but providing for intensification in a way that complies with clause 4 of Schedule 3C of the Resource Management Act 1991 (RMA).
- 1.3 Plan Change 78 and a potential replacement plan change is ultimately in response to the Government’s National Policy Statement on Urban Development 2020 (NPS-UD) and RMA amendments enacted in December 2021 and again in August 2025.
- 1.4 This is a summary report on the limited pre-notification engagement and consultation on a draft replacement plan change during August and September 2025. A more extensive report has been prepared for consultation and engagement since late 2023 on proposals to strengthen the AUP for natural hazards, which has been incorporated into the potential replacement plan change. The report on this process entitled ‘STRENGTHENING THE AUCKLAND UNITARY PLAN FOR NATURAL HAZARDS - CONSULTATION AND ENGAGEMENT FROM 2023 TO 2025 SUMMARY REPORT’ is included with this plan change as a section 32 report attachment.
- 1.5 Related and concurrent consultation and engagement with Māori - mana whenua and mataawaka – is addressed in a companion section 32 report for Plan Change 120 - Housing Intensification and Resilience entitled ‘MĀORI ENGAGEMENT AND CONSULTATION SUMMARY REPORT (Replacement Plan Change including Intensification (PC78), Natural Hazards and Light Rail Corridor)’.

2. Engagement on Plan Change 78

- 2.1 Plan Change 78 was prepared by Auckland Council through 2021 and 2022. The Council publicly consulted on a ‘preliminary response’ to the NPS-UD in April-May 2022, receiving extensive feedback from Aucklanders including mana whenua and other Māori groups community and business stakeholders, and government departments.
- 2.2 That feedback, along with the results of an independent survey of 2000 Aucklanders, was considered by the relevant committee of the Council towards the notification of Plan Change 78 on 18 August 2022. A summary of pre-notification consultation and engagement towards Plan Change 78 was included as an attachment to the overall evaluation s32 report on the Council’s AUP webpages at notification here: [pc-78-overall-evaluation-report-s32-engagement-reports](#)
- 2.3 Hearings on submissions received on Plan Change 78 commenced in March 2023. Hearings were deferred a number of times following two one-year extensions for decisions on the plan change to be confirmed. This was due firstly to destructive impacts from storms in early 2023

and secondly when a new government signalled a change in direction with NPS-UD and growth policy whereby MDRS was made optional.

3. Replacement plan change activity in 2025

- 3.1 In early 2025 the Government and the Council identified potential options for a ‘bespoke’ RMA amendment solution for Auckland. The objective was to enable the potential withdrawal of Plan Change 78 and its replacement, following decisions on city centre topics. A replacement plan change would seek to address natural hazards management, remove MDRS and enable a greater level of housing intensification in more of the right places such as around centres and transit stops.
- 3.2 The responsible government minister, Hon Chris Bishop, wrote to the Council on 12 March 2025 to acknowledge the ‘bespoke’ intention, amend existing directions related to Plan Change 78, and signal the progress of the Resource Management (Consenting and Other System Changes) Amendment Bill (RMA amendment bill) through 2025 to enable a replacement plan change to come forward. The Minister’s letter is shown at [Attachment 1](#). The review work of the Environment Select Committee on the RMA amendment bill was noted as providing ‘further solutions’ for Plan Change 78 and a replacement plan change.
- 3.3 Following this direction from the Government, preparation of a potential replacement plan change proceeded. Options for the scale, location and management of further intensification opportunities under NPS-UD Policy 3 were explored as were potential changes to ‘qualifying matters’ under NPS-UD Policy 4. These were discussed with members of the Council’s Policy and Planning Committee (the committee) in confidential workshops from April to June 2025. The workshops were confidential as the RMA amendment bill process was underway and so, prior to resulting legislation being enacted, there was no statutory framework in place to have these matters open to the public or any draft plan change being more formally considered for decision.
- 3.4 The Environment Select Committee reported its findings and recommendations in June 2025. This provided some clarification and direction for the RMA amendment legislation. However, the continuing lack of legislative ability for the Council to develop or endorse a draft replacement plan change until amended legislation was enacted effectively prevented prior engagement and consultation on options and proposals towards it. There was also no opportunity to engage on options and proposals with a wider audience during this time i.e. Aucklanders and other stakeholders, due to them still being formulated and not being sufficiently progressed to enable such engagement.
- 3.5 The Resource Management (Consenting and Other System Changes) Amendment Act 2025 (RMA amendment act) passed into law on 20 August 2025. This enabled a draft replacement plan change to be endorsed by the committee at an extraordinary meeting on 21 August 2025 for consultation with iwi authorities, government ministries and adjoining councils, and for seeking views of local boards. The committee meeting agenda containing the report (CP2025/17977) and minutes containing the resolution (PEPCC/2025/123) are shown at [Attachments 2 and 3](#).
- 3.6 Part 1 of New Schedule 3C in Schedule 1 of the RMA amendment act required a public notice of the withdrawal of Plan Change 78, should that be a decision of the Council, and supply of a

notice to the Minister for a direction to use the Streamlined Planning Process (SPP) to prepare an 'Auckland housing planning instrument' (a replacement plan change) by 10 October 2025. As a consequence, there was no time available to undertake engagement or consultation with the public of Auckland on the endorsed draft replacement plan change before a committee decision was required, at the latest by late September 2025, to notify a replacement plan change.

- 3.7 The draft replacement plan change was subsequently endorsed for notification at an extraordinary committee meeting on 24 September 2025. The meeting agenda containing the report (CP2025/19613) and minutes containing the resolution (PEPCC/2025/144) are shown at [Attachments 4 and 5](#).

4. Engagement and consultation with Māori

- 4.1 The preparation and delivery of Māori engagement and consultation on a draft replacement plan change for Plan Change 78 is addressed in the section 32 report 'MĀORI ENGAGEMENT AND CONSULTATION SUMMARY REPORT (Replacement Plan Change including Intensification (PC78), Natural Hazards and Light Rail Corridor)'. This includes the feedback received from engagement and consultation with iwi authorities on the draft replacement plan change.

5. Engagement and consultation with local boards

- 5.1 Local board chairs and planning portfolio lead members were invited to attend the seven Policy and Planning Committee confidential workshops held between April and August 2025 on a possible replacement plan change to Plan Change 78.
- 5.2 All local board members were invited to two confidential briefings on the emerging replacement plan change under development. These briefings were organised in conjunction with local board central and local teams. The first briefing on 18 July 2025 provided an update on the development of a plan change to replace Plan Change 78 and an overview of changes to the RMA that had been reported back to Parliament from the Environment Select Committee.
- 5.3 The second briefing on 8 August 2025 informed local board members of proposals towards a plan change that potentially replaced Plan Change 78 to assist them in providing views on it via resolutions at business or special meetings later in August or early September. This briefing included individual local board mapping review sessions where members were shown emerging planning maps for their areas with an explanation by Planning and Resource Consents department staff of the proposals and how they affected or applied to their areas. This highlighted what would change from the AUP and also Plan Change 78 maps.
- 5.4 Questions asked of staff at the briefings were generally responded to directly at the sessions. Questions that were unable to be answered due to time constraints at the briefings received written responses that were distributed to all the local boards after the meetings.
- 5.5 The passing of RMA amendments into law and subsequent endorsement of a draft replacement plan change at the Policy and Planning Committee meeting on the 21 August 2025 enabled a standard (i.e. the same) report to be considered by local boards for their views on withdrawing Plan Change 78 and on the draft replacement plan change. The local boards report is shown at [Attachment 6](#). The report sets out the context and information relating to the 21 August committee report, along with draft text chapters and a series of draft planning maps for each local board area.

- 5.6 Nineteen local board meetings took place from 26 August to 4 September 2025. Twelve of these were standard monthly business meetings where the draft replacement plan change report was on the agenda alongside other items. Seven of the meetings, all in September, were special meetings organised to consider only the replacement plan change report. This was due to the timing of the 21 August committee meeting being later in the same week as these local boards were having their standard August meetings.
- 5.7 Prior to meetings, some local boards organised public meetings in their areas to enable information to be shared about draft plan change proposals and to hear feedback. These were in some cases supported by Council planning staff. Many local boards also had community members in attendance at business and special meetings, with direct engagement about views on proposals being encouraged before elected members considered their views before making resolutions.
- 5.8 All nineteen sets of local board resolutions were collected from meeting minutes and collated into a single document soon after the last meeting ended. This document, shown at [Attachment 7](#), was distributed to all elected members, support staff and planning staff working on a potential replacement plan change.
- 5.9 Staff themed and summarised the resolutions – this table is shown at [Attachment 8](#). This included whether local boards had indicated support or not for the withdrawal of Plan Change 78, whether they supported the draft replacement plan change and what comments they had on it.
- 5.10 In addition, all resolutions that indicated lack of support for parts of the draft replacement plan change or requested changes to it were collected and reviewed and responded to by lead topic planning staff. The responses were guided by criteria prepared to assist the process - possible to make changes in the short amount of time available, whether any shifts in policy positions were involved, and the potential impact of changes on housing capacity. Any actions required of staff responses were also indicated, to be delivered in time for the next round of committee briefing.
- 5.11 A summary presentation of the resolutions incorporating the local board views was given as part of a committee workshop on 10 September 2025. The presentation slides are shown at [Attachment 9](#). Staff also indicated how requests for changes would be considered, in relation to the guidance provided by the criteria noted above.

6. Other engagement activity and consultation responses

- 6.1 Other engagement activity included a media article dated 22 August 2025 about the topic of Plan Change 78 and an article about the potential replacement plan change in 'OurAuckland', the news pages on the Council's website. This was augmented with a link to committee-endorsed draft plan change chapters and planning maps. This was made public as soon after the 21 August committee meeting and enabled community members to view the proposals and potentially discuss them further with elected members.
- 6.2 The Planning and Resource Consents information service - the 'Unitary Plan Inbox' - was available for members of the public to ask questions to be answered by staff and any further information sought about the draft replacement plan change proposals.
- 6.3 Correspondence was received from the Ministry of Education on 5 September regarding the draft replacement plan change and the potential withdrawal of Plan Change 78. The letter is

shown at [Attachment 10](#). No other feedback or correspondence was received from other government departments or adjoining authorities up to the 7 September 2025 engagement end date.

7. Conclusion

- 7.1 Consultation and engagement activity towards a potential plan change to the AUP replacing Plan Change 78 has not involved any formal public-facing activity other than information being provided on the draft replacement plan change after 21 August 2025. This is when the Council's Policy and Planning Committee endorsed a draft plan change for consultation on a limited basis with iwi authorities, adjoining councils, government departments and local boards for their views.
- 7.2 No public consultation or engagement on a pre-draft or pre-notification version of a replacement plan change was undertaken. The reasons were, firstly, that there was no statutory framework in place to enable proposals to be endorsed by the Council for any engagement until the draft plan change was endorsed on 21 August 2025. Secondly, the amount of time required to prepare options and proposals towards a draft plan change prevented the ability to consult upon them earlier, before a draft plan change was endorsed for limited statutory engagement.
- 7.3 Engagement with Māori has occurred primarily on the natural hazards aspects of a replacement plan change but also on the draft plan change since 21 August 2025. This is covered in detail in the related Māori consultation s32 report noted in this report.
- 7.4 Consultation and engagement with local boards on a potential replacement plan change involved briefings in July and August and reporting to meetings in late August and early September 2025. Resolutions from these meetings included feedback on the potential withdrawal of Plan Change 78 and its draft replacement, and requests for changes to it.
- 7.5 These views were collated and reported to a workshop of the committee and were included in the reporting of the draft proposed plan change for committee consideration on 24 September 2025 on whether to withdraw PC78 and notify the replacement plan change. Overall, local boards support or have not expressed a view on the withdrawal of Plan Change 78 and the draft replacement plan change.
- 7.6 Changes requested to the replacement plan change have been considered in relation to criteria that assist determination on whether to accept changes in the limited time available before a decision was made by the committee to endorse the draft plan change for notification.

Hon Chris Bishop

Minister of Housing
Minister for Infrastructure
Minister Responsible for RMA Reform
Minister of Transport
Leader of the House
Associate Minister of Finance
Associate Minister for Sport and Recreation



12 MAR 2025

CB-COR1323

Mayor Wayne Brown
Auckland Council
By email: mayor.wayne.brown@aucklandcouncil.govt.nz

Dear Mayor Brown

Thank you for your letter dated 1 November 2024 and the subsequent conversations we have had on ensuring Auckland is able to grow and develop to be a more productive, prosperous, attractive, and well-functioning city that can lift economic growth and living standards for all New Zealand.

As Minister Responsible for RMA Reform, I appreciate your council working closely with my officials to explore options for updating the Auckland Unitary Plan to better address natural hazards, making progress on the National Policy Statement on Urban Development (NPS-UD) and Medium Density Residential Standards (MDRS).

Amendments to the direction

As a step towards supporting good urban outcomes and increasing development capacity, I am amending the Minister for the Environment's Direction for the Intensification Streamlined Planning Process to Auckland Council (the direction) on the timing and sequencing of decisions on Plan Change 78 (PC78). These changes will provide for early decisions to be made on the city centre components, by bringing forward NPS-UD Policy 3(a) decisions to 30 May 2025. Your council officers have indicated this should be achievable, while also providing impetus for the Independent Hearings Panel and council to prioritise the work required to bring this capacity on stream quickly.

To help enable effort to be focused on this work, I am removing the 'statement of expectations' from the direction, which previously included notifying a plan change to enable intensification within the Auckland Light Rail corridor and address the management of natural hazards by 30 April 2025. This change does not mean that council is not required to do the upzoning work within the Auckland Light Rail corridor, PC78 will still be required to give effect to the NPS-UD and implement the MDRS by 31 March 2026.

I also acknowledge that your council is committed to progressing a plan change to address natural hazard risk as soon as possible.

Resource management reform

In your letter and in our recent conversations, you outlined the need for further solutions for PC78. The Resource Management (Consenting and Other System Changes) Amendment Bill 2024 is intended to provide these solutions. The Bill, which is currently before the Environment Select Committee, provides a pathway forward to withdraw those parts of PC78 that cannot be progressed and to notify a subsequent plan change which would go further on enabling housing intensification and address natural hazards. The Select Committee will be considering workability as part of their process, and I expect an achievable outcome from this.

There are further opportunities ahead through resource management reform. It is my intention to introduce legislation to replace the Resource Management Act 1991 before the end of this year.

I look forward to continuing our discussions on these important issues, and I again thank you for all your work to date. Housing supply is a critical issue for the Government, and I appreciate the work you are doing to advance housing and transport solutions for Auckland.

Yours sincerely



Hon Chris Bishop
Minister Responsible for RMA Reform

I hereby give notice that an extraordinary meeting of the Policy and Planning Committee will be held on:

Date: Thursday, 21 August 2025
Time: 10.00am
Meeting Room: Reception Lounge
Venue: Auckland Town Hall
301-305 Queen Street
Auckland

Te Komiti mō te Kaupapa Here me te Whakamahere / Policy and Planning Committee OPEN AGENDA

MEMBERSHIP

Chairperson	Cr Richard Hills	
Deputy Chairperson	Cr Angela Dalton	
Members	Houkura Member Edward Ashby	Cr Mike Lee
	Cr Andrew Baker	Cr Kerrin Leoni
	Cr Josephine Bartley	Cr Daniel Newman, JP
	Mayor Wayne Brown	Cr Greg Sayers
	Cr Chris Darby	Deputy Mayor Desley Simpson, JP
	Cr Julie Fairey	Cr Sharon Stewart, QSM
	Cr Alf Filipaina, MNZM	Cr Ken Turner
	Cr Christine Fletcher, QSO	Cr Wayne Walker
	Cr Lotu Fuli	Cr John Watson
	Houkura Member Hon Tau Henare	Cr Maurice Williamson
	Cr Shane Henderson	

(Quorum 11 members)

Sandra Gordon
**Kaitohutohu Mana Whakahaere Matua / Senior
Governance Advisor**

18 August 2025

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1 Ngā Tamōtanga | Apologies

2 Te Whakapuaki i te Whai Pānga | Declaration of Interest

3 Ngā Petihana | Petitions

There is no petitions section.

4 Ngā Kōrero a te Marea | Public Input

There is no public input section.

5 Ngā Kōrero a te Poari ā-Rohe Pātata | Local Board Input

There is no local board input section.

6 Ngā Pakihi Autaia | Extraordinary Business

Auckland Unitary Plan - Endorsement of a draft replacement plan change to enable statutory consultation and engagement

File No.: CP2025/17977

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Te take mō te pūrongo

Purpose of the report

1. To endorse a draft replacement plan change for the purposes of consultation with iwi authorities, government ministries, and adjoining councils, and seeking local board views, which will enable a decision in September on whether or not to withdraw in part, Proposed Plan Change 78 - Intensification.

Whakarāpopototanga matua

Executive summary

2. Enabling significant opportunities for development, in particular housing in the right places, is a fundamental aspect of the Auckland Unitary Plan (AUP). Under the previous government, the council was required to make widespread changes to the AUP to enable even greater levels of intensification. The resulting changes to the AUP were included in Proposed Plan Change 78 – Intensification (PC78).
3. Since early 2023, the council has strongly advocated to central government for a better way to enable even more development than the AUP already provides for, while addressing risks from natural hazards such as flooding and coastal erosion/inundation.
4. The Resource Management (Consenting and Other System Changes) Amendment Bill (due for Royal Assent on 18 August 2025) enables the council, if it chooses, to withdraw in part, PC78, provided that the council notifies a replacement plan change that satisfies newly enacted requirements. The council had previously been unable to withdraw PC78 (in whole or in part).
5. A draft replacement plan change is being prepared that meets these newly enacted requirements (see Attachments A to X).
6. Endorsement of a draft replacement plan change is being sought, to enable staff to consult with iwi authorities, government ministries and adjoining councils, and to request local board views on the draft replacement plan change and a corresponding withdrawal of PC78 in part.
7. Consultation with iwi authorities is a legal prerequisite for any plan change. Consultation with adjoining councils and government ministries is also mandatory. The council must consider any views and preferences expressed by a local board, if the decision affects or may affect the responsibilities or operation of the local board or the well-being of communities within its local board area. Consultation results and local board views will be reported at the September meeting.
8. Endorsement is a procedural decision that enables consultation to continue and local board views to be requested on the specific content of the draft replacement plan change and corresponding potential withdrawal of PC78.
9. The council will need to decide in September 2025 whether or not to withdraw from PC78 and, if so, to proceed with the replacement plan change. The endorsement of this draft plan change will enable that decision to be informed by the views of iwi and local boards in particular.

Ngā tūtohunga Recommendation/s

That the Policy and Planning Committee:

- a) ohia / endorse the draft replacement plan change (Attachments A to X to the agenda report) for the purposes of consultation with iwi authorities, adjoining councils and government ministries, and seeking local board views on a draft replacement plan change that would be required if the council makes a decision to withdraw in part, Proposed Plan Change 78 – Intensification
- b) tuhi tīpoka / note that the key differences between Proposed Plan Change 78 - Intensification and the draft replacement plan change are set out in paragraph 25 of the agenda report.

Horopaki Context

Introduction

10. Enabling significant opportunities for development, in particular housing in the right places, is a fundamental aspect of the AUP. Under the previous government, the council was required to make widespread changes to the AUP to enable even greater levels of intensification. The resulting changes to the AUP were included in Proposed Plan Change 78 – Intensification (PC78).
11. Since early 2023, the council has strongly advocated to central government for a better way to enable even more development than the AUP already provides for, while addressing risks from natural hazards such as flooding and coastal erosion/inundation.
12. The Resource Management (Consenting and Other System Changes) Amendment Bill (due for Royal Assent on 18 August 2025) enables the council, if it chooses, to withdraw in part, PC78, provided the council notifies a replacement plan change that satisfies newly enacted requirements. The council had previously been unable to withdraw PC78 (in whole or in part).
13. A draft replacement plan change is being prepared that meets these newly enacted requirements.
14. Endorsement of a draft replacement plan change is being sought, to enable staff to consult with iwi authorities, government ministries and adjoining councils, and to request local board views on the draft replacement plan change and a corresponding withdrawal in part of PC78.

Different plan making context for PC78 and any replacement plan change

15. The statutory settings for PC78 differ from how the council normally undertakes plan changes. Particular legal requirements apply to PC78, for example:
 - Ministerial directions apply
 - the span of the council’s decision-making is constrained compared to the usual plan-making process under the RMA
 - the council cannot fully address significant risks from natural hazards.
16. Consultation remains a mandatory requirement for any replacement plan change.

17. The latest RMA amendments:
 - enable the council to withdraw PC78 (in whole or in part) which would then trigger a mandatory replacement plan change
 - make any replacement plan change subject to different legal requirements, in particular, any replacement plan change **must enable the same of more capacity for development as PC78**
 - constrain the span of the council's decision-making compared to the usual plan-making process under the RMA
 - enable the council to fully address risks from natural hazards.
18. Two key procedural factors of relevance to this report are:
 - the limited window in which the council can decide whether to withdraw PC78: between the day the RMA amendments commence, and 6 October 2025
 - the mandatory requirement to consult on a draft plan change with iwi authorities, government ministries and adjoining councils and to obtain local board views, before deciding whether to approve a proposed plan change for notification (after seeking a direction from the relevant Minister).

Different timing for consultation driven by legislation and timeframes

19. At the time of writing, the Resource Management (Consenting and Other System Changes) Amendment Bill had completed its third reading and was awaiting Royal Assent. This amendment Act provides Auckland Council with specific provisions to withdraw PC78 (in whole or in part) and replace it with a new plan change.
20. Discussions have been underway with the relevant Minister and officials since the flooding in early 2023 to make changes to the law which constrains the council's ability to deal with natural hazards and the imposed Medium Density Residential Standards (MDRS).
21. As part of these discussions, relevant Ministers agreed to extensions of time for the completion of PC78 and, more recently, the relevant Minister advised he would enable the council to withdraw PC78 with certain requirements. These were awaiting Royal Assent at the time of writing.
22. Staff have been unable to formally consult on any replacement plan change until the amendments became law. Given the delays in the Parliamentary process, these amendments have only become law now, but we are required to make a decision on notification of a replacement plan change by 6 October 2025.
23. This means the council has a month from now to consult with iwi, ministries and adjoining councils, and seek the views of local boards, before making a decision on whether or not to withdraw in part PC78 and notify a replacement plan change.

Draft replacement plan change

24. With feedback from the committee, staff have prepared a draft replacement plan change to meet the requirements they understood would be included in amendments to the RMA. It also provides for improved management of development in areas affected by natural hazards. The draft replacement plan change is included in Attachments A to X. Key elements are the omission of some of the MDRS provisions, with compensation for foregone plan enabled capacity through increased Residential - Terrace Housing and Apartment Buildings zoning and allowance for higher building heights in certain locations, resulting in the same or more plan enabled capacity as PC78 but with more targeted intensification.

25. Relative to PC78, in the draft replacement plan change:
- a) there are stronger controls relating to managing risks from flooding, coastal hazards, landslides and wildfires
 - b) there are changes to the zoning (down-zoning) of properties that are at the highest risk from flooding and coastal hazards
 - c) MDRS has been replaced with different/improved standards
 - d) there is an increase in the amount of land zoned for two-storey medium density housing (Residential – Mixed Housing Suburban Zone)
 - e) there is a reduction in the amount of land zoned for three-storey medium density housing (the Residential – Mixed Housing Urban Zone)
 - f) building heights of up to 10 storeys are generally enabled in 23 walkable catchments around Rapid Transit Stops, except where qualifying matters apply
 - g) building heights of up to 15 storeys are generally enabled in 21 walkable catchments around Rapid Transit Stops, except where qualifying matters apply
 - h) outside of walkable catchments, building height controls for most of the Terrace Housing and Apartment Buildings zone are increased to enable buildings of six storeys (up from five storeys), with a more permissive height in relation to boundary control
 - i) the area of land zoned for Terrace Housing and Apartment Buildings zone around 14 town centres is increased (within generally 200 metres to 400 metres of the edge of the town centre)
 - j) the area of land around 11 additional town centres and local centres is zoned for Terrace Housing and Apartments Buildings zone (within generally 200 metres of the edge of the town centre or local centre)
 - k) sites within approximately 200 metres either side of 24 corridors on Auckland Transport's Frequent Transport Network is zoned Terrace Housing and Apartment Buildings zone
 - l) intensification requirements have been applied to the previously excluded Auckland Light Rail Corridor, to give effect to policies 3 and 4 of the Nation Policy Statement on Urban Development (NPS-UD) and the specific intensification requirements set out in the RMA for increased buildings heights in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Ave and Mount Albert; except where qualifying matters apply
 - m) removing additional areas of special character that are currently identified in the Auckland Unitary Plan, in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland and Morningside
 - n) to give effect to the New Zealand Coastal Policy Statement and the Regional Policy Statement, a new qualifying matter has been applied to a small number of walkable catchments and NPS-UD policy 3(d) locations to make the building heights or density requirements less enabling of development.

Tātaritanga me ngā tohutohu Analysis and advice

26. The purpose of this report is limited to seeking endorsement of the draft replacement plan change for the specific purposes of consultation with iwi authorities, adjoining councils and government ministries, and to enable local boards to provide their views on the possible withdrawal of PC78 and the draft replacement plan change.

27. There are two options available:
- **Option A:** endorse the draft replacement plan change for consultation and to obtain local board views (recommended)
 - **Option B:** do not endorse the draft replacement plan change for consultation and to obtain local board views (not recommended).
28. Council decision-makers need to be aware of and consider local board views about decisions that affect the local board areas and communities (sections 48J and 48K Local Government Act 2002). PC78 (and its potential replacement) would change planning provisions across Auckland. Local boards have a role in communicating views and preferences of their communities.
29. An option analysis is provided in Table 1 below. Option A is the recommended option.

Factors	Option A (recommended) Endorse draft replacement plan change for consultation	Option B Do not endorse draft replacement plan change for consultation
<p>Procedurally: enables later decision-making on PC78 potential withdrawal and notification of a replacement plan change</p>	<p>✓✓✓</p> <p>Consultation with iwi authorities is a statutory requirement under the RMA.</p> <p>The council is required to consider local board views and preferences on behalf of their communities. PC78 and any potential replacement plan change affect all local board areas except Aotea/Great Barrier Island and Waiheke Island.</p> <p>Council may choose how to proceed in satisfying its duty to give effect to the National Policy Statement on Urban Development, and whether to undertake the additional RMA requirements.</p>	<p>XXX</p> <p>There is insufficient time available for the council to later decide to withdraw PC78 in part and to proceed with a replacement plan change and still satisfy consultation requirements.</p> <p>The council would be vulnerable to legal challenge.</p> <p>The council would not have discharged its duty to consult with iwi authorities or to obtain local board views.</p>

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Factors	Option A (recommended) Endorse draft replacement plan change for consultation	Option B Do not endorse draft replacement plan change for consultation
<p>Policy-shaping: if the council later decides to progress a replacement plan change it is informed by consultation outcomes</p>	<p>✓✓</p> <p>The draft replacement plan change is still undergoing detailed refinement but is sufficiently complete to enable consultation to occur and to obtain local board views.</p> <p>The role of local boards in expressing views and preference on behalf of communities is amplified in the absence of sufficient time to consult with the wider public.</p> <p>Feedback from mana whenua consultation and local board views would be reported at the September 2025 committee meeting.</p>	<p>X</p> <p>Without consultation outcomes the council cannot (in the limited time available) amend the draft replacement plan change to address any concerns.</p> <p>✓</p> <p>If the council chooses not to withdraw PC78 in part the lack of consultation is irrelevant as there would not be any replacement plan change.</p>
<p>Time, effort and resourcing of mana whenua and local boards avoided if replacement plan change does not proceed</p>	<p>✓</p> <p>Consultation with mana whenua is important and should occur, even though subsequent decisions are yet to be made.</p>	<p>✓</p> <p>Entities are not put to the effort of an exercise that later proves to be redundant.</p>
<p>Related media interest will raise awareness of a potential replacement plan change for the wider public</p>	<p>✓</p> <p>The RMA amendment enabling the potential withdrawal of PC78 in part and requiring a replacement plan change does not provide sufficient time for general public consultation.</p>	<p>XX</p> <p>There is no visibility or public scrutiny of a potential replacement plan change.</p>

Tauākī whakaaweawe āhuarangi Climate impact statement

30. The council's climate goals are set out in Te Tāruke-ā-Tāwiri: Auckland's Climate Plan:

- to reduce greenhouse gas emissions to reach net zero emissions by 2050
- to prepare the region for the adverse effects of climate change.

31. A decision whether to endorse the draft replacement plan change for consultation does not trigger any climate-related matters. Reporting in September 2025 on the merit of substantive decision-making options will include a climate impact statement.

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

32. Views and infrastructure constraints and opportunities have been taken into account. Auckland Urban Development Office, Auckland Transport and Watercare Services Limited staff contributed to confidential workshops in which potential choices, risks and mitigations were discussed. Staff within the council have similarly contributed led by Planning and Resource Consents, but also including Policy, Chief Economist's Office, Legal and Healthy Waters and Flood Resilience.

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

33. One purpose of this report is to obtain the views of local boards on a draft replacement plan change, if the council decides in September to withdraw in part PC78 and proceed with a draft replacement plan change.
34. Local board chairs and portfolio leads were invited to participate in the seven committee workshops regarding development of a potential replacement plan change (held on 9, 16 and 30 April, 14 and 23 May, 25 June, and 6 August 2025).
35. All local board members were briefed on parts of the replacement plan change development at an elected members' briefing on 18 July 2025. Local boards were updated on 8 August on the results of capacity modelling completed for a mid-June version of a draft replacement plan change. The second briefing addressed:
- additional changes required to address capacity for development issues
 - changes to the provisions of a draft replacement plan change to manage the increased levels of intensification
 - application of additional qualifying matters
 - a review of a draft replacement plan change map viewer, which has since been updated further.
36. Local board meetings will take place from 26 August to 4 September 2025 to provide local boards with the opportunity to provide their views on the possible withdrawal of PC78 and its replacement with the notification of a proposed replacement plan change. Their views will be provided at the September meeting.

Tauākī whakaaweawe Māori Māori impact statement

37. Many issues raised by iwi authorities in consultation on PC78, and raised in iwi authorities' PC78 submissions, may remain relevant to any replacement plan change. As the draft replacement plan change would be a new plan change subject to different statutory requirements, it creates new council obligations for consultation with iwi authorities and participation. Iwi authorities may identify new matters. This requires a fresh approach informed by lessons learnt.
38. Consultation with iwi authorities on how the AUP manages natural hazards started with hui in March 2025, progressing to hui on a possible replacement plan change on 21 and 22 July 2025. The consultation process is ongoing, and it is necessary to provide iwi authorities with the draft replacement plan change to enable this to continue.

39. Outcomes of iwi authorities' consultation on natural hazard matters, including issues of concern, were twice reported to the council before decision making and notification of PC78 in 2022 (Planning Committee reports 30 June 2022 and 4 August 2022).
40. Houkura members and secretariat staff were invited to the confidential workshop series to date on 9, 16 and 30 April, 14 and 23 May, 25 June, and 6 August 2025.

Ngā ritenga ā-pūtea Financial implications

41. Consultation with iwi authorities, government ministries and adjoining local authorities are budgeted activities. Reporting to local boards to obtain views and preferences is also covered by existing budgets. Financial implications of mandatory consultation are low.
42. No consultation with the wider public is proposed: a full information or consultation campaign would have significant cost. These activities are not able to be undertaken because of the timeframes in the RMA Amendment Act.

Ngā raru tūpono me ngā whakamaurutanga Risks and mitigations

43. There is no specific risk associated with endorsing a draft replacement plan change for consultation with iwi authorities, government ministries and adjoining councils and obtaining local board views. Consultation reduces the risk of non-compliance with statutory requirements.
44. Providing the draft replacement plan change for these purposes does not constrain the council's subsequent decision making in September.
45. The draft replacement plan change proposes significant changes to the urban parts of the AUP. A key requirement (set by central government) has been to achieve the same or more capacity for development as PC78. Therefore, both PC78 and the draft replacement plan change both provide significantly more enabled capacity for development than the AUP. The draft replacement plan change is intended to distribute this capacity across Tāmaki Makaurau / Auckland in a more focused way with different implications in different locations. There has been limited time to develop provisions and to test them. Given the timeframes, there is limited time available to undertake consultation with iwi authorities, and there is insufficient time for engagement with the public.
46. The council has previously sought to engage with the public on significant draft plan changes: the absence of wider consultation creates a reputational risk. If a subsequent decision is made to withdraw in part PC78 and notify a replacement plan change, an extended timeframe for making submissions would be recommended when seeking directions from the relevant Minister. It would also be important to undertake a significant communications and engagement campaign to ensure Aucklanders know about the proposed replacement plan change and the opportunity to inform the final outcome by making a submission.

Ngā koringa ā-muri Next steps

47. If the recommendations made in this report are agreed to by the committee, staff will continue to consult with iwi authorities and the Ministry for the Environment and involve local boards. Consultation with adjoining councils and other government ministries will commence. Consultation results will be reported at a September Policy and Planning Committee meeting.

Ngā tāpirihanga Attachments

No.	Title	Page
A	Draft PC78 Replacement Plan Change Chapters_A_B_C_D	
B	Draft PC78 Replacement Plan Change Chapters_E_G	
C	Draft PC78 Replacement Plan Change Chapter H	
D	Draft PC78 Replacement Plan Change Chapter I <i>(Under Separate Cover)</i>	
E	Draft PC78 Replacement Plan Change Chapters_J_K_L_M <i>(Under Separate Cover)</i>	
F	Draft PC78 Replacement Plan Change Albert-Eden Map Series <i>(Under Separate Cover)</i>	
G	Draft PC78 Replacement Plan Change Devonport-Takapuna Map Series <i>(Under Separate Cover)</i>	
H	Draft PC78 Replacement Plan Change Franklin Map Series <i>(Under Separate Cover)</i>	
I	Draft PC78 Replacement Plan Change Henderson-Massey Map Series <i>(Under Separate Cover)</i>	
J	Draft PC78 Replacement Plan Change Hibiscus and Bays Map Series <i>(Under Separate Cover)</i>	
K	Draft PC78 Replacement Plan Change Howick Map Series <i>(Under Separate Cover)</i>	
L	Draft PC78 Replacement Plan Change Kaipātiki Map Series <i>(Under Separate Cover)</i>	
M	Draft PC78 Replacement Plan Change Māngere-Ōtāhuhu Map Series <i>(Under Separate Cover)</i>	
N	Draft PC78 Replacement Plan Change Manurewa Map Series <i>(Under Separate Cover)</i>	
O	Draft PC78 Replacement Plan Change Maungakiekie-Tāmaki Map Series <i>(Under Separate Cover)</i>	
P	Draft PC78 Replacement Plan Change Ōrākei Map Series <i>(Under Separate Cover)</i>	
Q	Draft PC78 Replacement Plan Change Ōtara-Papatoetoe Map Series <i>(Under Separate Cover)</i>	
R	Draft PC78 Replacement Plan Change Papakura Map Series <i>(Under Separate Cover)</i>	
S	Draft PC78 Replacement Plan Change Puketāpapa Map Series <i>(Under Separate Cover)</i>	
T	Draft PC78 Replacement Plan Change Rodney Map Series <i>(Under Separate Cover)</i>	
U	Draft PC78 Replacement Plan Change Upper Harbour Map Series <i>(Under Separate Cover)</i>	
V	Draft PC78 Replacement Plan Change Waitākere Ranges Map Series <i>(Under Separate Cover)</i>	
W	Draft PC78 Replacement Plan Change Waitematā Map Series <i>(Under Separate Cover)</i>	

No.	Title	Page
X⇒	Draft PC78 Replacement Plan Change Whau Map Series (<i>Under Separate Cover</i>)	

Item 7

Ngā kaihaina Signatories

Author	Christopher Turbott - Senior Policy Planner
Authorisers	John Duguid - General Manager Planning and Resource Consents Megan Tyler - Director Policy, Planning and Governance

Te Komiti mō te Kaupapa Here me te Whakamahere / Policy and Planning Committee

OPEN MINUTES

Minutes of an extraordinary meeting of the Policy and Planning Committee held in the Reception Lounge, Auckland Town Hall, 301-305 Queen Street, Auckland on Thursday, 21 August 2025 at 10.05am.

TE HUNGA KUA TAE MAI | PRESENT

Chairperson	Cr Richard Hills	
Deputy Chairperson	Cr Angela Dalton	
Members	Houkura Member Edward Ashby	
	Cr Andrew Baker	
	Cr Josephine Bartley	
	Mayor Wayne Brown	
	Cr Chris Darby	
	Cr Julie Fairey	Via electronic link From 10.08, Item 7
	Cr Alf Filipaina, MNZM	
	Cr Christine Fletcher, QSO	
	Cr Lotu Fuli	
	Houkura Member Hon Tau Henare	Until 12.55pm, Item 7
	Cr Shane Henderson	
	Cr Mike Lee	
	Cr Kerrin Leoni	From 10.11am, Item 7
	Cr Daniel Newman, JP	Via electronic link From 10.08am, Item 7
	Cr Greg Sayers	
	Deputy Mayor Desley Simpson, JP	
	Cr Sharon Stewart, QSM	From 10.07, Item 2
	Cr Ken Turner	
	Cr Wayne Walker	Via electronic link From 11.02am, Item 7
	Cr John Watson	From 10.10am, Item 7
	Cr Maurice Williamson	From 10.07am, Item 2

1 Ngā Tamōtanga | Apologies

Resolution number PEPCC/2025/119

MOVED by Chairperson R Hills, seconded by Deputy Chairperson A Dalton:

That the Policy and Planning Committee:

a) **whakaae / accept the apologies from members:**

Lateness

- Cr S Stewart
- Cr M Williamson

CARRIED

Electronic Attendance

Resolution number PEPCC/2025/120

MOVED by Cr G Sayers, seconded by Cr L Fuli:

That the Policy and Planning Committee:

a) **whakaae / approve electronic attendance under Standing Order 3.3.3 for:**

- Cr J Fairey (SO 3.3.3 b))
- Cr D Newman (SO 3.3.3 a))
- Cr W Walker (SO 3.3.3 b))

CARRIED

Note: An apology was subsequently received from Cr K Leoni for lateness.

Cr S Stewart entered the meeting at 10.07am.

Cr M Williamson entered the meeting at 10.07am.

2 Te Whakapuaki i te Whai Pānga | Declaration of Interest

There were no declarations of interest.

3 Ngā Petihana | Petitions

There were no petitions.

4 Ngā Kōrero a te Marea | Public Input

There was no public input.

5 Ngā Kōrero a te Poari ā-Rohe Pātata | Local Board Input

There was no local board input.

6 Ngā Pakihi Autaia | Extraordinary Business

There was no extraordinary business.

Cr D Newman joined the meeting at 10.08am.

Cr J Fairey joined the meeting at 10.08am.

7 Auckland Unitary Plan - Endorsement of a draft replacement plan change to enable statutory consultation and engagement

A PowerPoint presentation was given and documents were tabled in support of the item. Copies have been placed on the official minutes and are available on the Auckland Council website as minutes attachments.

Note: changes were made to the original recommendation, adding new clause c), as a Chair's recommendation.

Cr J Watson entered the meeting at 10.10am.

Cr K Leoni entered the meeting at 10.11am.

Cr W Williamson left the meeting at 10.15am

Cr G Sayers left the meeting at 10.15am

Cr G Sayers returned to the meeting at 10.34am

MOVED by Chairperson R Hills, seconded by Mayor W Brown:

That the Policy and Planning Committee:

- a) ohia / endorse the draft replacement plan change (Attachments A to X to the agenda report) for the purposes of consultation with iwi authorities, adjoining councils and government ministries, and seeking local board views on a draft replacement plan change that would be required if the council makes a decision to withdraw in part, Proposed Plan Change 78 – Intensification
- b) tuhi tīpoka / note that the key differences between Proposed Plan Change 78 - Intensification and the draft replacement plan change are set out in paragraph 25 of the agenda report.
- c) tuhi tīpoka / note that where any errors in the draft PC78 replacement plan change maps (appended to this report) are identified, that these maps will be updated for local boards and adjustments noted.

Note: questions on the motion commenced.

Note: further changes were made amending clause c) and adding new clauses d) and e), with the agreement of the meeting.

Cr W Williamson returned to the meeting at 10.45am

Cr G Sayers left the meeting at 10.57am.

Cr W Walker joined the meeting at 11.02am.

Cr J Fairey left the meeting at 12.04pm.

Cr J Fairey rejoined the meeting at 12.13pm.

MOVED by Chairperson R Hills, seconded by Mayor W Brown:

That the Policy and Planning Committee:

- a) ohia / endorse the draft replacement plan change (Attachments A to X to the agenda report) for the purposes of consultation with iwi authorities, adjoining councils and government ministries, and seeking local board views on a draft replacement plan change that would be required if the council makes a decision to withdraw in part, Proposed Plan Change 78 – Intensification
- b) tuhi tīpoka / note that the key differences between Proposed Plan Change 78 - Intensification and the draft replacement plan change are set out in paragraph 25 of the agenda report.
- c) tuhi tīpoka / note that where any errors in the draft replacement plan change maps (appended to this report) are identified, that these maps will be updated for local boards and adjustments noted.
- d) tuhi tīpoka / note that the Ministry for the Environment have confirmed that there will be submissions and hearings on the plan change.
- e) tonono / request that the Mayor and Chair of the Policy and Planning Committee seek urgent discussions with the Minister for Resource Management Reform about council's expectations for the public to have their say in submissions and hearings, including an extended submission timeframe and the hearings process.

Cr G Sayers returned to the meeting at 12.32pm.

Houkura Member T Henare retired from the meeting at 12.55pm.

The meeting adjourned at 1.07pm and reconvened at 1.43pm.

Cr K Turner, Cr W Walker and Cr G Sayers were not present.

Electronic Attendance

Resolution number PEPCC/2025/121

MOVED by Chairperson R Hills, seconded by Deputy Chairperson A Dalton:

That the Policy and Planning Committee:

- a) **whakaae / approve electronic attendance under Standing Order 3.3.3 for:**
 - **Cr C Fletcher (SO 3.3.3 b))**

CARRIED

Cr K Turner returned to the meeting at 1.45pm.

Note: debate on the motion commenced.

Note: further changes were made amending clause a), with the agreement of the meeting.

Cr G Sayers returned to the meeting at 1.53pm.

Extension of Meeting Time

Resolution number PEPCC/2025/122

MOVED by Cr C Fletcher, seconded by Cr J Watson:

That the Policy and Planning Committee:

- a) **whakaae / agree to extend Cr Lee's speaking time by three minutes to complete his address**

CARRIED

Cr W Walker rejoined the meeting at 2.08pm.

Resolution number PEPCC/2025/123

MOVED by Chairperson R Hills, seconded by Mayor W Brown:

That the Policy and Planning Committee:

- a) **whakaae / approve the draft replacement plan change (Attachments A to X to the agenda report) for the purposes of consultation with iwi authorities, adjoining councils and government ministries, and seeking local board views on a draft replacement plan change that would be required if the council makes a decision to withdraw in part, Proposed Plan Change 78 – Intensification.**
- b) **tuhi tīpoka / note that the key differences between Proposed Plan Change 78 - Intensification and the draft replacement plan change are set out in paragraph 25 of the agenda report.**
- c) **tuhi tīpoka / note that where any errors in the draft replacement plan change maps (appended to this report) are identified, that these maps will be updated for local boards and adjustments noted.**
- d) **tuhi tīpoka / note that the Ministry for the Environment have confirmed that there will be submissions and hearings on the plan change.**
- e) **tono / request that the Mayor and Chair of the Policy and Planning Committee seek urgent discussions with the Minister for Resource Management Reform about council's expectations for the public to have their say in submissions and hearings, including an extended submission timeframe and the hearings process.**

CARRIED

Note: Under Standing Order 1.8.6, the following councillor's requested that their dissenting vote be recorded:

- Cr M Lee
- Cr J Watson

Attachments

- A 21 August 2025, Policy and Planning Committee, Item 7 - Auckland Unitary Plan - Endorsement of a draft replacement plan change to enable statutory consultation and engagement - presentation

8 Te Whakaaro ki ngā Take Pūtea e Autaia ana | Consideration of Extraordinary Items

There was no consideration of extraordinary items.

2.47pm

The chairperson thanked members for their attendance and attention to business and declared the meeting closed.

CONFIRMED AS A TRUE AND CORRECT RECORD
AT A MEETING OF THE POLICY AND PLANNING
COMMITTEE HELD ON

DATE:.....

CHAIRPERSON:.....

I hereby give notice that an extraordinary meeting of the Policy and Planning Committee will be held on:

Date: **Wednesday, 24 September 2025**
Time: **10.00am**
Meeting Room: **Reception Lounge**
Venue: **Auckland Town Hall**
301-305 Queen Street
Auckland

Te Komiti mō te Kaupapa Here me te Whakamahere / Policy and Planning Committee

OPEN AGENDA

MEMBERSHIP

Chairperson	Cr Richard Hills	
Deputy Chairperson	Cr Angela Dalton	
Members	Houkura Member Edward Ashby	Cr Mike Lee
	Cr Andrew Baker	Cr Kerrin Leoni
	Cr Josephine Bartley	Cr Daniel Newman, JP
	Mayor Wayne Brown	Cr Greg Sayers
	Cr Chris Darby	Deputy Mayor Desley Simpson, JP
	Cr Julie Fairey	Cr Sharon Stewart, QSM
	Cr Alf Filipaina, MNZM	Cr Ken Turner
	Cr Christine Fletcher, QSO	Cr Wayne Walker
	Cr Lotu Fuli	Cr John Watson
	Houkura Member Hon Tau Henare	Cr Maurice Williamson
	Cr Shane Henderson	

(Quorum 11 members)

Sandra Gordon
**Kaitohutohu Mana Whakahaere Matua / Senior
Governance Advisor**

19 September 2025

Contact Telephone: +64 9 890 8150
Email: Sandra.Gordon@aucklandcouncil.govt.nz
Website: www.aucklandcouncil.govt.nz

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1 Ngā Tamōtanga | Apologies

2 Te Whakapuaki i te Whai Pānga | Declaration of Interest

3 Ngā Petihana | Petitions

There is no petitions section.

4 Ngā Kōrero a te Marea | Public Input

There is no public input section.

5 Ngā Kōrero a te Poari ā-Rohe Pātata | Local Board Input

There is no local board input section.

6 Ngā Pakihi Autaia | Extraordinary Business

Decision-making on the withdrawal of Plan Change 78 - Intensification and notification of a replacement plan change

File No.: CP2025/19613

Item 7

Te take mō te pūrongo

Purpose of the report

1. To decide whether to proceed with Plan Change 78 or withdraw Plan Change 78 and progress the draft replacement plan change.

Whakarāpopototanga matua

Executive summary

2. Auckland Council has been raising concerns and requests to be able to withdraw Plan Change 78: Intensification (PC78) since 2022. The concerns included the imposition of the Medium Density Residential Standards (MDRS) throughout the entire urban area of Auckland, the inability to change rules, policies and zones as they relate to natural hazards until after PC78 is complete and design outcomes in the built environment.
3. On 21 August 2025, the Government made amendments to the Resource Management Act 1991 (RMA) that addresses some of these concerns while, at the same time, sets additional legislative requirements in exchange for the ability to withdraw Plan Change 78. Some of the key requirements set by the Government include:
 - enabling at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) was made operative: approximately two million dwellings (2,074,000 dwellings)
 - enabling building heights of at least 15 storeys within (at least) the walkable catchments of the Maungawhau, Kingsland and Morningside stations
 - enabling building heights of at least ten storeys within (at least) the walkable catchments of Baldwin Avenue and Mount Albert stations
 - use the streamlined planning process.
4. This report sets out the two options available to the Policy and Planning Committee: continue with PC78 or withdraw PC78 and replace it with the draft replacement plan change.
5. The draft replacement plan change removes the MDRS from across the region and replaces that plan-enabled housing capacity in other places, in particular around rail/bus stations, along rapid and frequent bus routes and around centres. The spatial distribution of plan-enabled capacity can be summarised as enabling reduced capacity in the outer areas of the urban area of Auckland and greater capacity in the isthmus and central parts of the region.
6. The plan-enabled capacity for housing required is 2.074 million, this being the amount enabled under PC78 which also includes Policy 3 a) to d) of the National Policy Statement on Urban Development 2020 (NPS-UD). As at the last modelling run of 18 September, we have plan-enabled capacity of 2.69M-2.03M. That is 0.2-1.9 per cent short of that requirement.
7. From an infrastructure perspective, plan-enabled capacity does not mean that we need to provide or plan for infrastructure for 2 million additional dwellings. Population projections and Auckland Council's growth model are used to assist in the planning and investment of infrastructure. It is also noted that while this spatial distribution better aligns with existing infrastructure and future infrastructure investment, it does not mean that every area that has been enabled for housing can immediately be developed. Local network capacity may still impact the practicality of development, just as it does now.

8. Overall, it is recommended that the Committee agree to withdraw PC78 and replace it with the draft replacement plan change for public submissions and hearings.

Item 7

Ngā tūtohunga Recommendation/s

That the Policy and Planning Committee:

- a) whakaae / agree to withdraw Plan Change 78: Intensification in part, except as it relates to the Business-Metropolitan Centre zone and related precincts (excluding Westgate and New Lynn precincts) and qualifying matters, for the following reasons:
 - i) natural hazard down-zoning and changes to rules and policies can be achieved more quickly and simply through a single process
 - ii) the Medium Density Residential Standards can be removed
 - iii) the spatial distribution of plan-enabled capacity is more aligned with the compact city approach and infrastructure investment and affordability
 - iv) infrastructure providers have greater ability to plan and prioritise investment with a more targeted spatial distribution.
- b) whakaae / approve the draft replacement plan change for notification as described in Attachments O – AU, subject to the responsible Minister issuing a direction to use the streamlining planning process.
- c) tāpae / delegate authority to the Director Policy, Planning and Governance to correct any errors and anomalies with the draft replacement plan change prior to notification.
- d) tono / request staff to notify the responsible Minister by 10 October 2025, in accordance with clause 75A of Schedule 1 of the RMA, for a direction to use the streamlined planning process to prepare an Auckland Housing Planning Instrument, that seeks:
 - i) approval to notify the replacement plan change in b) above
 - ii) a notification date of 30 October 2025
 - iii) that there be a “friend of submitter” appointed to assist submitters in making submissions
 - iv) a submission period from 3 November to 19 December 2025
 - v) that there be hearings held on submissions.
- e) tono / request staff to prepare the public notice giving public notice of the withdrawal of Plan Change 78: Intensification in part, no later than 10 October 2025.

Horopaki Context

The legislative context is constraining

9. The Resource Management Act 1991 (RMA) requires the council to incorporate the Medium Density Residential Standards (MDRS) into relevant residential zones. The council must give effect to the National Policy Statement on Urban Development 2020 (amended 2022) (NPS-UD).

10. Policy 3 of the NPS-UD and the MDRS must be implemented/incorporated in an Intensification Planning Instrument using the Intensification Streamlined Planning Process. The process for, and content of, Plan Change 78 is constrained in comparison to the usual plan-making process. For example, it has not been possible to:
 - a) downzone in response to significant natural hazards or
 - b) withdraw Plan Change 78 (until [amendments to the RMA](#) came into force on 21 August 2025), or
 - c) remove the Medium Density Residential Standards (MDRS).

The weather events of early 2023 required a planning response

11. Following the 2023 severe weather events the Planning, Environment and Parks Committee directed staff to urgently prepare a scope of works for land use and regulatory changes to the AUP and Plan Change 78 regarding flooding. A meeting with relevant Ministers of the Crown was requested to discuss legislative implications, amongst other matters (resolution PEPCC/2023/6).
12. Strengthening the AUP was identified as a key opportunity to improve the current regulatory and non-regulatory settings for natural hazard risk based on:
 - a) findings and recommendations from the council's draft RMA section 35 monitoring report,
 - b) the drivers behind the 'future coastal hazards plan change' (an already committed work programme activity), and
 - c) the initial analysis of the impacts from the 2023 weather events.
13. The Planning, Environment and Parks Committee endorsed the preparation of changes to strengthen the AUP to manage natural hazards on 29 June 2023 ([PEPCC/2023/82](#)). This formed the basis of the council's draft natural hazard planning response.

The Council has requested action by successive Governments since 2023

14. As well as the issue relating to natural hazards, council was also strongly opposed to the mandatory MDRS provisions throughout the urban area.
15. The current Government has provided legislative change that address some of council's concerns while, at the same time, setting additional legislative requirements in exchange for the ability to withdraw Plan Change 78. Amendments to the RMA came into force on 21 August 2025. Attachment M outlines the RMA criterion for inclusion in a streamlined planning process.
16. A decision to withdraw Plan Change 78:
 - a) is optional
 - b) is limited to those parts of Plan Change 78 yet to be made operative (other than the Business Metropolitan Centre Zone provisions on which decisions on IHP recommendations are yet to be made)
 - c) if taken, requires the council to:
 - i) undertake a replacement plan change which may remove the MDRS
 - ii) use the streamlined planning process (see Attachment M for an explanation of the streamlined planning process)
 - iii) notify the Minister by 10 October 2025 with information about the replacement plan change to enable a direction for the Streamlined Planning Process to be used.
 - iv) issue a public notice of the decisions to withdraw and replace.

17. The key mandatory requirements are:
 - a) Enabling at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) was made operative: approximately two million dwellings (2,074,000 dwellings).
 - b) Enabling building heights of at least 15 storeys within (at least) the walkable catchments of the Maungawhau, Kingsland and Morningside stations.
 - c) Enabling building heights of at least ten storeys within (at least) the walkable catchments of Baldwin Avenue and Mount Albert stations.
 - d) Additional analysis of certain proposed qualifying matters' impact on the provision of housing capacity. The evaluative requirement applies to any provisions not already in the AUP, plus existing AUP provisions that are not specifically listed in the RMA (but may be proposed by the council as an 'other' qualifying matter).
18. Successive Governments have chosen to directly intervene in council's planning role through legislation and National Policy Statements. The MDRS was a bi-partisan requirement that came into force without warning for impacted councils. The recent Resource Management (Consenting and Other Systems) Bill enables Auckland Council to have some greater autonomy on planning decision but still retains very clear parameters and limits around those choices.
19. It is expected that this intervention by governments will continue into the future, including as part of the replacement RMA and new NPS-UD, - this appears to be a new political norm.

Some existing RMA requirements continue at the same time as the new provisions

20. The council's requirement to implement Policy 3 of the NPS-UD continues:
 - a) Policy 3a: City Centre Zone, was made operative on 6 June 2025
 - b) Policy 3b: Metropolitan centres' hearings are completed (excluding New Lynn and Westgate precincts); the council will make decisions on recommendations in the new triennium
 - c) Policy 3c: walkable catchments in which building heights of at least six storeys must be enabled are required around rapid transit stops and the edges of the City Centre Zone and edges of Metropolitan Centre Zones
 - d) Policy 3d: within and adjacent to Town, Local and Neighbourhood Centres, building heights and density of urban form commensurate with the level of commercial activity and community services.
21. The council's requirement to incorporate the MDRS in all relevant residential zones continues if Plan Change 78 is not withdrawn. This includes in the Auckland Light Rail Corridor and some Special Housing Areas.
22. Qualifying matters may be proposed.
23. The council must undertake consultation with mana whenua and entities listed in the RMA in preparing a draft plan change or variation to a plan change. The council must consider the views and preferences of local boards expressed on behalf of communities regarding the content of an Auckland Council plan change ([section 48J Local Government Act 2002](#)).

Some decisions have already been made in relation to Plan Change 78

24. City Centre: The council accepted all the Independent Hearing Panel's (IHP) recommendations on the City Centre; subsequently the City Centre aspects of PC78 were made operative on 6 June 2025.

25. Metropolitan centres: The council requested the IHP to complete hearings on and make recommendations to the council on Business - Metropolitan Centre Zone and related precincts (except New Lynn and Westgate that are affected by natural hazards and whose hearing was deferred pending the power to vary or replace Plan Change 78).
26. Staff will report on IHP Metropolitan Centre Zone recommendations in the next term of council to the appropriate committee. Provisions the council accepts will become operative on public notification; any provisions rejected by the council will be referred to the Minister for a decision.
27. Auckland Light Rail Corridor: To provide certainty and avoid consultation duplication, and also an intensification response proportionate to light rail, the Planning Committee resolved to delay intensification in the Auckland Light Rail Corridor until the route and stations are known ([PLA/2022/86](#)).

Statutory consultation was undertaken August-September 2025

28. Staff undertook statutory consultation on the draft replacement plan change as required through legislation.
29. The themes and feedback from the local boards are covered later in the report and in Attachments C, D and E.
30. Mana whenua engagement results are covered later in the report and in Attachments A, G, H and I.
31. No responses were received from adjoining local authorities. Feedback from the Ministry of Education is included at Attachment B.

Tātaritanga me ngā tohutohu Analysis and advice

Draft Replacement Plan Change

32. In order for the Committee to consider a decision to withdraw PC78, staff have prepared a draft replacement plan change for PC78. Direction was sought from the Committee through a series of workshops and briefings. Proposed text, proposed mapping and supporting section 32 evaluations are included in separate attachments to this report (for administration reasons, due to the volume of attachments).
33. The committee resolved to approve the draft replacement plan change included in the 21 August 2025 agenda for the purposes of mandatory consultation (resolution [PEPCC/2025/123](#)). Feedback from consultation at mana whenua hui, with Ministers of the Crown and views and preferences of local boards is discussed later in this report. See Attachments A, B, C and E. Written feedback from three iwi authorities is included at Attachments G, H, and I.
34. There are three key elements that are discussed in greater detail:
 - i) Housing capacity enabled
 - ii) Natural hazards
 - iii) Amendments made since 21 August.

Housing Capacity

35. A key mandatory requirement of a replacement plan change (and integral to its recommendation and decision-making phases) is the requirement to enable at least the same amount of housing capacity as if Plan Change 78 (as notified) was made operative.

36. Plan-enabled **capacity** is the maximum number of homes that could be built under planning rules. Housing **supply** refers to actual take-up – the number of new homes that have been, or are likely to be built – given demand, infrastructure readiness, planning rules and commercial feasibility.
37. From an economics perspective, a larger amount of capacity relative to demand is prudent given uncertainties over the commercial feasibility and availability of sites for redevelopment. Additionally, abundant capacity helps ease price pressures by increasing competition among landowners. The evidence shows the Auckland Unitary Plan, which increased capacity by allowing more flexible land use, has led to more new homes and better rental affordability than would otherwise have been the case.¹ Attachment L provides additional advice from Auckland Council’s Chief Economist.
38. Housing capacity means the housing that is enabled as a permitted, controlled or restricted discretionary activity. Housing capacity modelling uses spatial data (maps) and relevant proposed and operative planning rules. Each full model run takes at least four weeks. Only one plan change version can be modelled at a time.
39. Modelling is undertaken to the same standard as Plan Enabled Capacity modelling for the council’s Housing and Business Development Capacity Assessment (HBA) required every three years by the NPS-UD. Methodology accords with best practice and as agreed with central government officials. The purpose is to measure:
 - a) a baseline of capacity enabled through Plan Change 78 and
 - b) the effect of changes in the draft replacement plan change on enabled housing capacity.
40. To satisfy the new RMA requirements, the baseline is the notified Plan Change 78’s plan-enabled housing capacity. This excludes rural zones, the Future Urban zone and the Hauraki Gulf Islands, as these areas fall outside the urban environment as defined in the NPS-UD.
41. Capacity modelling for the Auckland Light Rail Corridor and Special Housing Areas was based on operative AUP zoning and rules as at 18 August 2022, the date Plan change 78 was notified. The changed planning inputs into the capacity model are the different zoning extents and rules included in the draft replacement plan change (see Attachment J). More detailed information on housing capacity will be provided ahead of the committee meeting.
42. Elected members provided feedback through a series of workshops on a range of different choices all of which will affect housing capacity numbers and their spatial distribution. For example:
 - a) concentrated / dispersed capacity
 - b) more / less Residential – Mixed Housing Urban Zone
 - c) inclusion / removal of the MDRS
 - d) more / fewer standards in walkable catchments, in Residential – Terrace Housing and Apartment Buildings Zone (and the type and permissiveness of those standards)
 - e) more / fewer walkable catchments with heights exceeding six storeys, and the number of storeys to be enabled
 - f) more / fewer intensification corridors and the depth of the Residential – Terrace Housing and Apartment Buildings Zoning response
 - g) different / homogenised heights in Residential – Terrace Housing and Apartment Buildings Zone outside walkable catchments.

¹ See Ryan Greenaway-McGrevy and Peter C.B. Phillips (2023), “The impact of upzoning on housing construction in Auckland”, *Journal of Urban Economics*, Volume 136; Ryan Greenaway-McGrevy and Yun So (2024), “Can Zoning Reform Reduce Housing Costs? Evidence from Rents in Auckland”, *Economic Policy Centre Working Paper 16*, University of Auckland;

43. Removing the MDRS creates a challenge in ensuring at least the approximate two million plan-enabled housing capacity under Plan Change 78, because the MDRS contributed around half the capacity. Auckland Council’s MHU zone, which is the most similar, has design requirements that create reduced capacity relative to the MDRS, and the MHS zone even less. This has meant an increased focus on intensification in walkable catchments, around centres and rail/busway stations, and along main bus routes.

Housing capacity: Modelling results

44. The capacity modelling of plan-enabled capacity at 18 September is 2.034M dwellings using the THAB Height in Relation to Boundary (HIRB) approach (which is 1.9% under the 2.074M of PC78) and 2.069M dwellings using the THAB Floor Area Ratio (FAR) approach (which is 0.2% under the 2.074M of PC78).
45. A summary of density-based estimates compared to the modelled Baseline results are shown in Table 1 below.

Table 1: Baseline (modelled) vs Replacement Options (estimated) Housing Capacity

	Baseline	THAB HIRB Version 3 (18th September Zoning) – Estimate based on V2.0 (THAB HIRB) density	THAB FAR Version 3 (18th September Zoning) – Estimate based on V2.2 (THAB FAR) density
Dwelling capacity in Business Zones	478,606	573,472*	573,472*
Dwelling capacity in Residential Zones	1,595,340	1,460,787	1,496,231
Total plan-enabled dwelling capacity	2,073,946	2,034,259	2,069,703
Difference from Baseline (dwellings)	-	-39,687	-4,243
Difference from Baseline (%)	-	-1.9%	-0.20%

*Business estimate held constant at Replacement Plan Change Version 2.0 and Version 2.2 – assumes no material change in Business Zone distribution or sensitive zone interface in the Version 3 (18 September) version of zoning.

46. If the council decides to withdraw PC78, a final model run will be completed to be included in the information submitted to the Minister by 10 October.

Natural Hazards

47. The draft replacement plan change integrated two major workstreams. Consultation on the 21 August version was the first opportunity for iwi authorities, local boards and other key entities to comment on the package of draft provisions and mapping. However, consultation on the development of a strengthened AUP natural hazards risk framework has been underway since late 2023.
48. In addition to engagement with iwi authorities and other Māori entities, staff undertook the following activities in developing and testing draft provisions:
- a) a series of workshops with the committee and local board chairs
 - b) a series of workshops with an external technical reference group of leading topic specialists

- c) deliberative democracy participatory exercise with community representatives across Auckland and also storm affected communities
 - d) direct engagement with Ministry for the Environment and Kāinga Ora officials, the Natural Hazards Commission and the insurance, banking, property, public health, network utilities and hazard management sectors
 - e) work across the council group particularly with Healthy Waters and Flood Resilience, and Auckland Recovery Office
 - f) engagement with the council's demographic advisory panels.
49. Responses from all entities has informed development of the strengthened AUP framework in the draft replacement plan change.
50. The strengthened AUP framework can be advanced through both options. However, as previously noted, 'down-zoning' cannot occur if PC78 continues until Plan Change 78 is operative.

Amendments to the draft plan change

51. Relative to the 21 August draft endorsed for consultation, staff have made amendments to section 32 evaluation reports and economic analysis. Changes were also made to draft mapping and draft text to:
- a) Apply qualifying matters
 - b) Increase housing capacity
 - c) Respond to consultation and/or political direction.
 - d) Correct errors.
52. Qualifying matters and key changes are further discussed at Attachment N and F respectively.

Comparison between Plan Change 78 and the Draft Replacement Plan Change

53. There are two options open to the Committee: to continue with PC78 or to withdraw PC78 and replace it with the draft replacement plan change. Legally, these are the only two options available to the council and therefore the report does not evaluate any other alternatives.
54. There are some process implications of continuing with PC78:
- a) The Minister has reiterated the March 2026 decision-making date in his most recent letter to Mayor Brown. Council will need to request another extension to the process as we would be unable to meet this timeframe.
 - b) A variation/s to PC78 will need to be notified to intensify the Auckland Light Rail Corridor. This variation/s will need to 'catch up' with the rest of PC78 so that all decisions are made together, meaning that the overall process will be extended.
 - c) A plan change would be required to strengthen the natural hazard policies, rules and zones in the AUP. A plan change to down-zone would need to be notified only once PC78 has been completed.
 - d) The MDRS will remain in place across the region.
55. Prior to the requirements for a replacement plan change being known, the committee considered the dis-benefits of confusion of process and additional costs of variations and new plan changes outweighed any benefits to ratepayers and submitters from continuing with PC78.

56. The table below considers key elements of process and content that have been under discussion by council since PC78 was notified. It does not seek to rank the comparators or say either option is good or bad – rather it seeks to give a general analysis of how positive (✓) or negative (✗) either option is in achieving the various comparators.

Table 2: Key comparison between Plan Change 78 and the Draft Replacement Plan Change

Comparator	Plan Change 78	Draft Replacement Plan Change
Natural hazard (down zone)	✗	✓✓
Natural hazard (rule / policy)	✗ ²	✓✓
Removal of the MDRS	✗✗	✓✓
ALR Corridor upzoning	✗ ³	✓✓
Enabled capacity (amount)	✓✓	✓✓
Enabled capacity (spatial distribution)	✗	✓
Use of Qualifying Matters	✓✓	✓✓
Pre-draft public engagement	✓✓	✗✗
Complexity of process	✗	-
Time to complete	✗	✓

57. The combination of the removal of the MDRS, the reduced yield of Auckland Council’s MHU Zone (as compared with MDRS), the policy 3 walkable catchments and the legislative 10/15 storey heights around five rail stations have resulted in a more targeted spatial distribution of enabled capacity along key transport corridors, around centres and rail/bus stations. It has resulted in the removal of additional Special Character areas around Kingsland and Maungawhau.
58. In general terms, the draft replacement plan change enables reduced capacity in the outer areas of the region and greater capacity in the isthmus and central parts of the region. This better aligns with existing infrastructure and future infrastructure investment.
59. When comparing the two options, it is considered that the draft replacement plan change has benefits:
- Natural hazard down-zoning and changes to rules and policies can be achieved more quickly and simply through a single process.
 - MDRS can be removed.
 - The spatial distribution of plan-enabled capacity is more aligned with the compact city approach and infrastructure investment and affordability.
 - It enables greater ability for infrastructure providers to plan and prioritise investment with a more targeted spatial distribution.

² This would become **positive** if a policy and rule plan change is initiated as soon as possible.

³ This would become **positive** if a variation is notified for the ALR corridor as soon as possible.

- e) The design outcomes of council's MHU zone are better than the MDRS, although changes have had to be made to achieve the capacity requirement that make the MHU zone and MDRS less distinct.
60. It is also considered that the draft replacement plan change has challenges:
- a) Some communities are concerned with the extent of possible changes in their neighbourhoods. This is particularly prevalent in some of the older suburbs of the central isthmus.
 - b) There is a further reduction in Special Character areas in the Kingsland and Maungawhau areas – this is a concern for some communities.
 - c) The legislative requirement for every site to be able to be developed for 10 or 15 storeys (where applicable) is unrealistic and may result in poor design outcomes on small sites.
 - d) The scale and intensity of development that would be enabled in the THAB Zone across the city will have increased shading and dominance impacts on neighbouring properties compared to the current provisions.
 - e) No ability to engage with Aucklanders prior to developing the draft replacement plan change.
 - f) Concern about the disconnect between infrastructure readiness and enabled capacity in some parts of Auckland.

Tauākī whakaaweawe āhuarangi Climate impact statement

61. Both options enable approximately two million dwellings in Auckland's urban environment. Greenfield development is included only where land has already been live-zoned for urbanisation. Provision of housing capacity in existing urban areas is consistent with the regional policy statement's framework for growth and avoids placing increased reliance on private motor vehicle trips with an expanding urban footprint.
62. Both options enable additional housing capacity in and around centres, and in walkable catchments from existing and planned rapid transit stations on the rail and busway networks. These attributes are positive in terms of supporting movement without increasing carbon emissions. The less dispersed nature of development likely under the replacement plan change compared to Plan Change 78 has benefits in terms of a greater alignment with existing and planned rapid and frequent public transport, with associated reductions in carbon emissions.
63. Strengthening the AUP's framework for significant risk from natural hazards responds to our changing climate. The severity and frequency of significant weather events is increasing, with these experiences reflected in hazard modelling. The strengthened framework includes a policy shift from managing significant risk in the urban area to avoiding significant risk, aligning with the existing greenfields approach.
64. Regardless of option this shift can be implemented through changing:
- a) the regional policy statement
 - b) regional plan, regional coastal plan, and district plan provisions
 - c) zoning of the properties most-affected by significant natural hazard risk to reduce risk to life and property.
65. A key benefit of withdrawing and replacing Plan Change 78 is that the council is able to fully implement these changes in the short-term, rather than waiting for Plan Change 78 to become operative.

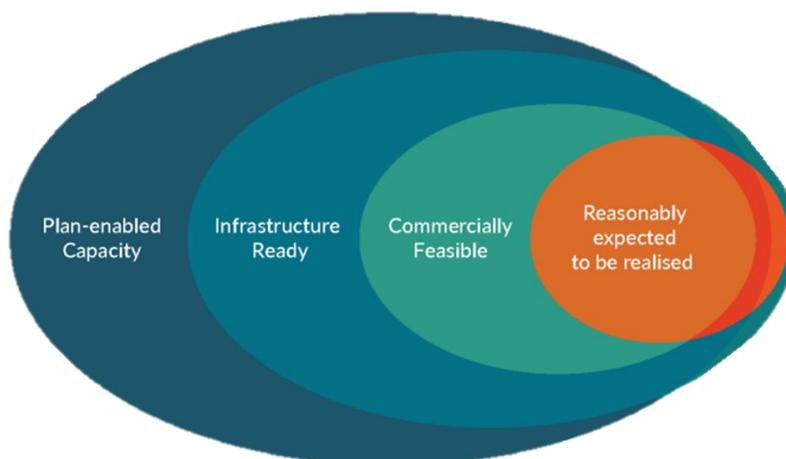
Ngā whakaaweawe me ngā tirohanga a te rōpū Kaunihera Council group impacts and views

66. The same level of housing capacity must be enabled regardless of the option chosen. Two million dwellings' capacity is not the same as the market providing two million additional houses.

Infrastructure

67. What can reasonably be expected to be realised depends on a range of factors including the availability of bulk and network-connecting infrastructure:

Figure 1: Enabled capacity exceeds infrastructure provision

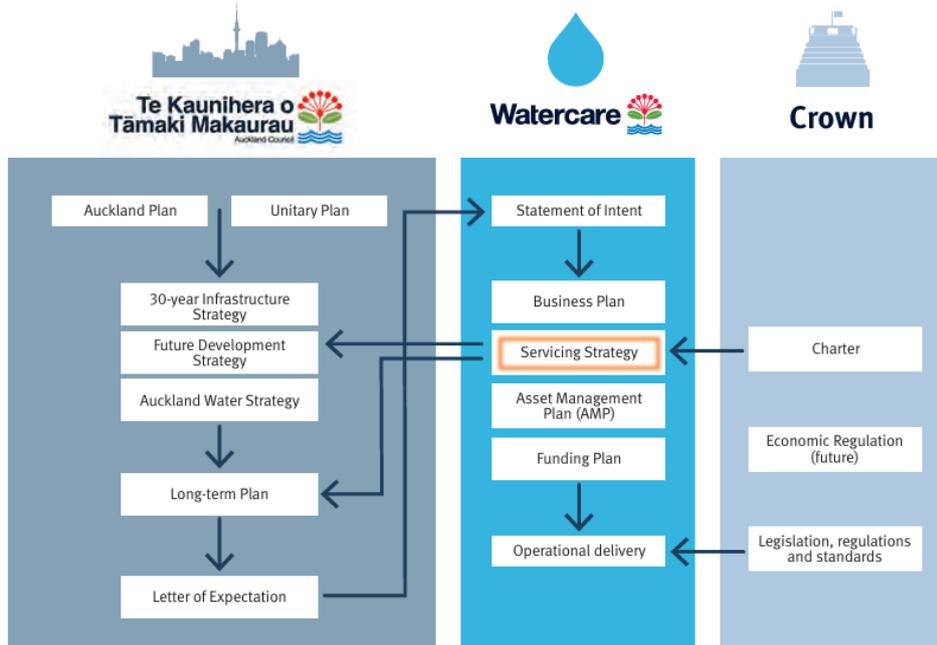


68. There will be an infrastructure deficit between what housing capacity is enabled in the AUP after planning processes are completed and the housing that can be constructed with connections to the water supply and wastewater networks. Similarly roads, roading upgrades, active mode networks and public transport services will not be supplied to match plan-enabled capacity.

Watercare Services Limited and Auckland Transport

69. Watercare and Auckland Transport have been key contributors to the council's development strategies, most recently the Future Development Strategy 2023 and the council's submission on the government's Going for Housing Growth urban development options for RMA replacement legislation. The government has foreshadowed a requirement for providing for 30 years' growth using high growth rates, but acknowledged infrastructure should not be provided on the same trajectory because it simply is not necessary, affordable or feasible.
70. Watercare cannot afford to provide reticulated networks and treatment for water supply and wastewater for two million dwellings in anything other than the very long-term. However, even if Watercare could, it would be completely inefficient to provide more infrastructure than what is actually required, and in locations where housing capacity opportunity is not to be realised. Bulk and network connecting infrastructure must be planned and staged. Watercare is currently developing its Metropolitan Servicing Strategy to achieve infrastructure provision as per the Future Development Strategy (and beyond, taking a 70-year planning horizon).

Figure 4: Watercare Metropolitan Servicing Strategy



Source: Watercare Metropolitan Servicing Strategy documentation www.watercare.co.nz

71. Decisions like where to enable intensification will inform the council's expectations of Watercare and Auckland Transport, and the group's planning and operational delivery. Watercare and Auckland Transport staff have contributed to the development of Plan Change 78 and the draft replacement plan change. Auckland Transport and Watercare staff participated in the 17 September committee workshop and confirmed that, due to the less dispersed nature of plan-enabled capacity, the replacement plan change would be easier to respond to than Plan Change 78.
72. Legislation developed by the government will continue to be critical for the council group to overcome financial and funding shortcomings and provide better tools for fairly apportioning the costs of growth, including the costs borne by growth beneficiaries.

Infrastructure and options under consideration

73. Auckland Transport supports intensification in and around centres and rapid transit stations, and along frequent bus corridors particularly to support the significant investment in the City Rail Link. For this reason, Auckland Transport is supportive of withdrawing plan Change 78 and notifying a replacement plan change.
74. Auckland Transport advises substantial investment in the transport network will be required over the medium to long term, regardless of option, to support Auckland's growing population. Investment is needed primarily in public transport, walking and cycling infrastructure.

Healthy Waters and Flood Resilience

75. Staff have been key contributors to development of the strengthened significant natural hazard framework (which can be implemented by either of the options). Healthy Waters and Flood Resilience staff provided specialised flooding modelling across Auckland's catchments, and provided technical advice regarding flooding depths, velocities and risks to life and property.

Other council departments

76. Work from across the council underpins implementation of the options available to the committee.

Ngā whakaaweawe ā-rohe me ngā tirohanga a te poari ā-rohe

Local impacts and local board views

77. Local boards have a statutory function to express views and preferences on behalf of communities that may be affected, in providing views on Auckland Council plans, including changes to the AUP.
78. Intensification changes to the district plan section of the AUP would not apply to the Hauraki Gulf Islands. Natural hazard content includes regional plan and regional policy statement changes that apply region-wide, including within the boundaries of the Waiheke and Aotea/Great Barrier Island Local Boards.

Natural hazards

79. Local boards support a strengthened framework for managing significant risk from natural hazards. Local board chairs were invited to the natural hazards series of plan development workshops. The draft strengthened framework was included in the 21 August version provided to local boards for their views where most of the regulatory response proposed is with strengthened rules (and policies); the draft replacement plan change proposes down-zoning of the properties at most significant risk from natural hazards.

Intensification

80. Local board chairs and portfolio members were invited to attend seven committee workshops commencing April 2025 as work developed for a draft, potential, plan change pending RMA amendments. All-member local board briefings occurred on 18 July and 8 August 2025 (followed by local board-specific sessions on draft plan change mapping).
81. Local boards' views were mixed between retaining or withdrawing Plan Change 78 (and undertaking a replacement plan change). Nine local boards expressly supported withdrawal while eight local boards were either unclear or did not specify a view. Eight local boards supported the draft replacement plan change and one local board partially supported it.
82. There were a number of requests for amendments which, in almost all cases, reduced housing capacity. There is insufficient time to make these changes and to find alternative areas for increased capacity.
83. Views from local boards were sought on the 21 August draft plan change version following the committee's approval of that version for consultation purposes. A compilation of local board views is included at Attachment C, and themes and responses are included at Attachment D and a summary of local boards' views provided at Attachment E.

Tauākī whakaaweawe Māori

Māori impact statement

84. Plan-making for Plan Change 78 was undertaken involving iwi authorities. Development of natural hazard plan change material which may be used in both of the available options was similarly prepared.

Potential impacts

85. Iwi authorities have had limited ability to actively participate in the draft replacement plan change process due to the short time-frame for consultation and for many iwi authorities a conflicting obligation with the annual Koroneihana. Potential impacts identified primarily through hui include:
- a) impacts on the abilities of people and communities to provide for their cultural well-being and for their health and safety given the amount of intensification being proposed
 - b) uncertainty regarding how values and aspirations of iwi and hapū for urban development have been taken into account and provided for
 - c) whether cultural values, rights and interests within the Auckland Light Rail Corridor have been considered
 - d) impacts of wastewater and stormwater overflows on cultural associations with waterways and the coast in Tāmaki Makaurau. These associations are well documented through statutory acknowledgements in Treaty Settlements.
 - e) impacts of the increased pressure from intensification on the region's natural and physical resources in responding to growth
 - f) limited response to effects on cultural landscapes, including maunga viewshafts and cultural heritage
 - g) limited understanding of how the plan change impacts Treaty settlement lands, areas covered by Statutory Acknowledgement and other mechanisms on individual interests.
86. The council has had limited ability to respond to these concerns and how the identified resource management issues of concern to iwi authorities have been or are to be addressed given the brief window for feedback and the limited time available to consider amendments or additions to the draft replacement plan change prior to the Committee's decision.

Potential mitigations

87. Some matters proposed in the draft replacement plan change have been carried forward from Plan Change 78 to address issues also raised in Plan Change 78 engagement. This includes height and building sensitive controls for the slopes of maunga, and the inclusion of some site and area-specific zoning responses to ensure intensification does not impact some cultural values.
88. Some new matters in the draft replacement plan change accord with feedback from iwi authorities. For example, newly proposed Coastal Environment and Lake Pupuke qualifying matters are proposed to limit intensification in the coastal environment and lake edge where there is known Māori cultural heritage. While some maunga viewshafts were reviewed, no reduction or alteration of viewshafts is proposed.
89. Because there was sufficient time to engage on natural hazards throughout the preparation period, feedback from iwi authorities on natural hazards management has been incorporated into the plan change (see Attachment A). However, site specific matters might still arise as the spatial impact of risk mapping and zoning decisions are better understood by iwi authorities.
90. Iwi authorities might also make detailed submissions seeking amendments that address their issues, which will require a council response.

91. If the committee decides to withdraw and replace Plan Change 78, there are several ways the council can continue to respond to the issues raised. Specific programmes of work on opportunities and constraints include updating the Future Development Strategy, reviewing/replacing the AUP under new legislation once it comes into effect, and a range of infrastructure plans. The council could establish a 'friend of the submitter' service to complement the streamlined planning process, in which case iwi authorities as well as the general public could be assisted to prepare submissions.
92. Specific feedback from three iwi authorities are attached at Attachment G, H and I. Consultation undertaken with iwi authorities and other entities in relation to natural hazards is recorded in Attachment A.

Ngā ritenga ā-pūtea Financial implications

Administration costs

93. Completing Plan Change 78 is a budgeted activity. Undertaking a natural hazards plan change is a budgeted activity. The work programme will be updated to reflect any changed implementation mechanism(s) to implement NPS-UD and/or natural hazards following the committee's decision whether to proceed with, or withdraw, Plan Change 78.
94. Costs relating to each of the options outlined in this paper are expected to be within the overall budget allowed for in the LTP. Future years' budgets will be adjusted to reflect timing changes as appropriate for the option chosen, and this will be completed as part of the normal Annual Planning process for 2026/2027.
95. When a plan change or variation impacts the whole region, the RMA requires a hard copy letter to be sent to all Auckland ratepayers advising of (a) the planning instrument and (b) the time period in which submissions may be lodged. Data management and printing costs are in the order of \$2.5M.
96. Continuing with PC78 is likely to have the higher administrative cost as it is likely to require a major mailout for those affected by an Auckland Light Rail corridor variation and potentially two additional Auckland-wide/large mailouts to address natural hazards (one to strengthen the policies and rules, and one to address zoning issues after Plan Change 78 becomes operative). This cost would be reduced if the council waits until Plan Change 78 is operative until it addresses natural hazard policies, rules and zoning through a single process. Not initiating a variation for the Auckland Light Rail corridor would further reduce costs, but would mean that Plan Change 78 continues to be in breach of the RMA.

Infrastructure costs

97. The likely differences in water and wastewater infrastructure costs between the more dispersed growth (Plan Change 78) versus a more targeted approach (the draft replacement plan change) are discussed in the Council Group impacts section.

Ngā raru tūpono me ngā whakamaurutanga Risks and mitigations

98. Risks have been outlined in the analysis section of this agenda report.

Ngā koringa ā-muri Next steps

99. The council must make decisions on the Independent Hearings Panel Metropolitan Centre Zone related recommendations irrespective of whether it continues with Plan change 78 or withdraws Plan Change 78 in part and proceed with a replacement plan change. Reporting on those recommendations (once received) will occur in the next council term.

100. Actions stemming from decision-making are determined by the option chosen. Under both options, staff must communicate the committee’s decision to the Independent Hearings Panel for Plan Change 78 as the decision will affect the Panel’s responsibilities.

Continue with Plan Change 78

- 101. Should the committee decide to continue with Plan Change 78 and its compulsory MDRS provisions, the committee may wish to request that staff report to the incoming council on a potential variation for the Auckland Light Rail corridor, and options to address natural hazard policies and rules ahead of Plan Change 78 becoming operative.
- 102. Any downzoning for natural hazards would need to be addressed through a separate plan change process after Plan Change 78 becomes operative. The council would also need to seek an extension of time from the Minister for Resource Management Reform, as it would be impossible for the Independent Hearings Panel to hear the remaining submissions on Plan Change 78, make its recommendations to the council and for the council to make its decisions within the current 31 March 2026 deadline.

Withdraw Plan change 78 and replace it with the draft replacement plan change

- 103. Should the committee decide to withdraw and replace Plan Change 78, it will need to record reasons for deciding to withdraw Plan Change 78 in part (the withdrawal including the withdrawal of Business - Metropolitan Centre Zone precincts New Lynn and Westgate but otherwise excluding the Business - Metropolitan Centre Zone and related matters including precincts).
- 104. The committee will also need to request staff to:
 - a) Publicly notify the partial withdrawal of Plan Change 78 by 10 October 2025.
 - b) Finalise the draft notice that must be sent to the Minister for the Environment by 10 October 2025 regarding the draft replacement plan change (clause 75A of Schedule 1).
 - c) Correct any errors or minor amendments to finalise the draft plan change subject to delegated authority approval.
 - d) Publicly notify the draft replacement plan change (noting the Minister’s directions will specify procedural steps and timeframes for the streamline planning process).

**Ngā tāpirihanga
Attachments**

No.	Title	Page
A⇒	Consultation with iwi authorities	
B⇒	Feedback from the Ministry of Education	
C⇒	Compilation of local board views	
D⇒	Thematic grouping of local board views	
E⇒	Summary of local board views on draft replacement plan change	
F⇒	Summary of key changes to draft replacement plan change	
G⇒	Feedback from Ngaati Tamaoho	
H⇒	Feedback from Ngaati-Te-Ata	
I⇒	Feedback from Te Ākitai Waiohua	
J⇒	Housing capacity results for Plan Change 78	
K⇒	Differences between Plan Change 78 and the draft replacement plan change	
L⇒	Plan-enabled capacity and housing supply - Implications	

No.	Title	Page
M⇒	Statutory criteria for inclusion of additional matters	
N⇒	Qualifying matters	
O⇒	Draft Replacement Plan Change 120 Chapters A_B_C_D	
P⇒	Draft Replacement Plan Change 120 Chapters E_G	
Q⇒	Draft Replacement Plan Change 120 Chapter H	
R⇒	Draft Replacement Plan Change 120 Chapter I	
S⇒	Draft Replacement Plan Change 120 Chapters J_K_L_M (<i>Under Separate Cover</i>)	
T⇒	Draft Replacement Plan Change 120 Section 32 Chapters A_C (<i>Under Separate Cover</i>)	
U⇒	Draft Replacement Plan Change 120 Section 32 Chapter D Overlays (<i>Under Separate Cover</i>)	
V⇒	Draft Replacement Plan Change 120 Section 32 Chapter H Zones (<i>Under Separate Cover</i>)	
W⇒	Draft Replacement Plan Change 120 Section 32 Chapter I Precincts (<i>Under Separate Cover</i>)	
X⇒	Draft Replacement Plan Change 120 Section 32 Chapter K Designations (<i>Under Separate Cover</i>)	
Y⇒	Draft Replacement Plan Change 120 Section 32 Consultation General (<i>Under Separate Cover</i>)	
Z⇒	Draft Replacement Plan Change 120 Section 32 Consultation with Māori (<i>Under Separate Cover</i>)	
AA⇒	Draft Replacement Plan Change 120 Section 32 Natural Hazards (<i>Under Separate Cover</i>)	
BB⇒	Draft Replacement Plan Change 120 Section 32 Policy 3 Intensification (<i>Under Separate Cover</i>)	
CC⇒	Draft Replacement Plan Change 120 Maps Albert-Eden (<i>Under Separate Cover</i>)	
DD⇒	Draft Replacement Plan Change 120 Maps Devonport-Takapuna (<i>Under Separate Cover</i>)	
EE⇒	Draft Replacement Plan Change 120 Maps Franklin (<i>Under Separate Cover</i>)	
FF⇒	Draft Replacement Plan Change 120 Maps Henderson-Massey (<i>Under Separate Cover</i>)	
GG⇒	Draft Replacement Plan Change 120 Maps Hibiscus and Bays (<i>Under Separate Cover</i>)	
HH⇒	Draft Replacement Plan Change 120 Maps Howick (<i>Under Separate Cover</i>)	
II⇒	Draft Replacement Plan Change 120 Maps Kaipātiki (<i>Under Separate Cover</i>)	
JJ⇒	Draft Replacement Plan Change 120 Maps Māngere-Ōtāhuhu (<i>Under Separate Cover</i>)	
KK⇒	Draft Replacement Plan Change 120 Maps Manurewa (<i>Under Separate Cover</i>)	
LL⇒	Draft Replacement Plan Change 120 Maps Maungakiekie-Tāmaki (<i>Under Separate Cover</i>)	

Item 7

No.	Title	Page
MM⇒	Draft Replacement Plan Change 120 Maps Ōrākei (<i>Under Separate Cover</i>)	
NN⇒	Draft Replacement Plan Change 120 Maps Ōtara-Papatoetoe (<i>Under Separate Cover</i>)	
OO⇒	Draft Replacement Plan Change 120 Maps Papakura (<i>Under Separate Cover</i>)	
PP⇒	Draft Replacement Plan Change 120 Maps Puketāpapa (<i>Under Separate Cover</i>)	
QQ⇒	Draft Replacement Plan Change 120 Maps Rodney (<i>Under Separate Cover</i>)	
RR⇒	Draft Replacement Plan Change 120 Maps Upper Harbour (<i>Under Separate Cover</i>)	
S⇒S	Draft Replacement Plan Change 120 Maps Waitākere Ranges (<i>Under Separate Cover</i>)	
TT⇒	Draft Replacement Plan Change 120 Maps Waitematā (<i>Under Separate Cover</i>)	
UU⇒	Draft Replacement Plan Change 120 Maps Whau (<i>Under Separate Cover</i>)	

Ngā kaihaina Signatories

Author	Megan Tyler - Director Policy, Planning and Governance
Authoriser	Phil Wilson - Chief Executive

Te Komiti mō te Kaupapa Here me te Whakamahere / Policy and Planning Committee

OPEN MINUTES

Minutes of an extraordinary meeting of the Policy and Planning Committee held in the Reception Lounge, Auckland Town Hall, 301-305 Queen Street, Auckland on Wednesday, 24 September 2025 at 10.06am.

TE HUNGA KUA TAE MAI | PRESENT

Chairperson	Cr Richard Hills	
Deputy Chairperson	Cr Angela Dalton	Via electronic link from 10.08am, Item 6
Members	Houkura Member Edward Ashby	
	Cr Andrew Baker	
	Cr Josephine Bartley	
	Mayor Wayne Brown	
	Cr Chris Darby	
	Cr Julie Fairey	
	Cr Alf Filipaina, MNZM	
	Cr Christine Fletcher, QSO	
	Cr Lotu Fuli	Via electronic link from 10.10am, Item 6
	Houkura Member Hon Tau Henare	
	Cr Shane Henderson	
	Cr Mike Lee	
	Cr Kerrin Leoni	
	Cr Daniel Newman, JP	Via electronic link, from 10.10am, Item 7
	Cr Greg Sayers	
	Deputy Mayor Desley Simpson, JP	
	Cr Sharon Stewart, QSM	
	Cr Ken Turner	
	Cr Wayne Walker	
	Cr John Watson	
	Cr Maurice Williamson	

1 Ngā Tamōtanga | Apologies

There were no apologies.

Electronic Attendance

Resolution number PEPCC/2025/141

MOVED by Chairperson R Hills, seconded by Deputy Mayor D Simpson:

That the Policy and Planning Committee:

a) whakaae / approve electronic attendance under Standing Order 3.3.3 for:

- Deputy Chairperson, Cr A Dalton (SO 3.3.3 b))
- Cr D Newman (SO 3.3.3 b))
- Cr L Fuli (SO 3.3.3.b))

CARRIED

2 Te Whakapuaki i te Whai Pānga | Declaration of Interest

There were no declarations of interest.

3 Ngā Petihana | Petitions

There were no petitions.

4 Ngā Kōrero a te Marea | Public Input

There was no public input.

5 Ngā Kōrero a te Poari ā-Rohe Pātata | Local Board Input

There was no local board input.

6 Ngā Pakihi Autaia | Extraordinary Business

There was no extraordinary business.

Cr A Dalton joined the meeting at 10.08am.

Cr L Fuli joined the meeting at 10.08am.

7 Decision-making on the withdrawal of Plan Change 78 - Intensification and notification of a replacement plan change

Additional documents had been circulated prior to the meeting, as follows:

- Draft Replacement Plan Change 120 s32 Overview Evaluation
- Draft Replacement Plan Change 120 s32 Economic Matters
- Draft Replacement Plan Change Housing Capacity Results

A copy of these documents have been placed on the official minutes and are available on the Auckland Council website as a minutes attachment.

A PowerPoint presentation was given in support of the item. A copy has been placed on the official minutes and is available on the Auckland Council website as a minutes attachment.

Cr D Newman joined the meeting at 10.20am

IMSB Member T Henare left the meeting at 11.35am.

Cr A Filipaina left the meeting at 11.38am.

IMSB Member T Henare returned to the meeting at 11.45pm

Cr A Filipaina returned to the meeting at 11.49am.

Note: changes were made to the original recommendation, adding new clauses f), g), h), i), j) and k), as a Chair's recommendation

Questions on the item commenced.

MOVED by Chairperson R Hills, seconded by Mayor W Brown:

That the Policy and Planning Committee:

- a) whakaae / agree to withdraw Plan Change 78: Intensification in part, except as it relates to the Business-Metropolitan Centre zone and related precincts (excluding Westgate and New Lynn precincts) and qualifying matters, for the following reasons:
 - i) natural hazard down-zoning and changes to rules and policies can be achieved more quickly and simply through a single process
 - ii) the Medium Density Residential Standards can be removed
 - iii) the spatial distribution of plan-enabled capacity is more aligned with the compact city approach and infrastructure investment and affordability
 - iv) infrastructure providers have greater ability to plan and prioritise investment with a more targeted spatial distribution.
- b) whakaae / approve the draft replacement plan change for notification as described in Attachments O – UU, subject to the responsible Minister issuing a direction to use the streamlining planning process.
- c) tāpae / delegate authority to the Director Policy, Planning and Governance to correct any errors and anomalies with the draft replacement plan change prior to notification.
- d) tono / request staff to notify the responsible Minister by 10 October 2025, in accordance with clause 75A of Schedule 1 of the RMA, for a direction to use the streamlined planning process to prepare an Auckland Housing Planning Instrument, that seeks:
 - i) approval to notify the replacement plan change in clause b) above
 - ii) a notification date of 30 October 2025
 - iii) that there be a "friend of submitter" appointed to assist submitters in making submissions
 - iv) a submission period from 3 November to 19 December 2025
 - v) that there be hearings held on submissions in a timeframe that ensures submitters have genuine and adequate opportunity to be heard by the Independent Hearings Panel.

- e) tono / request staff to prepare the public notice giving public notice of the withdrawal of Plan Change 78: Intensification in part, no later than 10 October 2025.
- f) tuhi tīpoka / note that the plan-enabled capacity achieved in the draft replacement plan change is modelled as exceeding 2 million homes.
- g) tuhi tīpoka / note Auckland Council's firm position that the outcomes for Aucklanders are more important than meeting a theoretical housing capacity target and that the Independent Hearing Panel and Auckland Council (as final decision maker) must be able to focus on achieving the best outcomes for Auckland through the final form of plan-enabled housing capacity.
- h) tuhi tīpoka / note that urban design controls and Auckland Council's Urban Design Panel are critical to ensuring the liveability of Auckland as it grows, and the intention for the Urban Design Panel to be adequately resourced to respond to the plan change once operative.
- i) tono / request of the Minister that when determining the expertise of the independent hearings commissioners, that this includes urban design, architecture, planning, infrastructure, economics and law.
- j) tono / request advice in the new term of council on the impacts of the former Government's removal of the ability of councils to include minimum carpark requirements in their planning documents, with a focus on areas without access to good public transport.
- k) tono / request that the Mayor reiterate to Ministers that in relation to greenfields:
 - i) Auckland Council's 2024-2034 Future Development Strategy provides for 15,000 hectares of Future Urban Zoned land over 30 years, of which around one third has already been zoned for urban development
 - ii) only residential and business zoned land is counted towards plan-enabled capacity under the National Policy Statement of Urban Development – this does not include Future Urban Zoned land
 - iii) provision of infrastructure requires planning and sequencing, not just delivery
 - iv) currently, growth does not pay for growth, rather all ratepayers are subsidising the cost of greenfield infrastructure
 - v) it is more efficient to utilise existing infrastructure in urban areas than build new infrastructure in greenfields
 - vi) that Auckland Council looks forward to the Government's promised new funding and financing tools, including Development Levies, that will ensure that growth pays for growth.

Cr G Sayers left the meeting at 12.21pm.

The meeting adjourned at 12.21pm and reconvened at 12.35pm.

Cr C Fletcher was not present.

Electronic Attendance

Resolution number PEPCC/2025/142

MOVED by Cr A Baker, seconded by Cr A Filipaina:

That the Policy and Planning Committee:

- a) **whakaae / approve electronic attendance under Standing Order 3.3.3 for:**
 - **Cr G Sayers (SO 3.3.3 b))**

CARRIED

*Cr C Fletcher returned to the meeting at 12.36pm.
Cr G Sayers joined the meeting via electronic link at 12.40pm.*

Questions on the item continued.

The meeting adjourned at 2.06pm and reconvened at 2.37pm

Cr J Bartley, Cr C Darby, Cr A Filipaina, Cr W Walker, Cr J Watson and Cr M Williamson were not present.

*Cr J Bartley returned to the meeting at 2.38pm.
Cr C Darby returned to the meeting at 2.38pm.
Cr W Walker returned to the meeting at 2.38pm.
Cr J Watson returned to the meeting at 2.38pm.
Cr A Filipaina returned to the meeting at 2.44pm.
Cr M Williamson returned to the meeting at 2.44pm.*

Debate on the motion commenced.

MOVED by Deputy Mayor D Simpson, seconded by Cr A Baker:

That the Policy and Planning Committee:

- i) whakaū / confirm the 21 August 2025 package of planning controls for the 10 and 15 storey Terraced Housing and Apartment Building zoned areas, which includes the Height in Relation to Boundary controls.

Note: during questions on the amendment, the meeting agreed to incorporate the amendment into the original motion.

MOVED by Chairperson R Hills, seconded by Mayor W Brown an amendment by way of addition:

That the Policy and Planning Committee:

- a) whakaae / agree to withdraw Plan Change 78: Intensification in part, except as it relates to the Business-Metropolitan Centre zone and related precincts (excluding Westgate and New Lynn precincts) and qualifying matters, for the following reasons:
 - i) natural hazard down-zoning and changes to rules and policies can be achieved more quickly and simply through a single process
 - ii) the Medium Density Residential Standards can be removed
 - iii) the spatial distribution of plan-enabled capacity is more aligned with the compact city approach and infrastructure investment and affordability
 - iv) infrastructure providers have greater ability to plan and prioritise investment with a more targeted spatial distribution.
- b) whakaae / approve the draft replacement plan change for notification as described in Attachments O – UU, subject to the responsible Minister issuing a direction to use the streamlining planning process.
- c) tāpae / delegate authority to the Director Policy, Planning and Governance to correct any errors and anomalies with the draft replacement plan change prior to notification.
- d) tono / request staff to notify the responsible Minister by 10 October 2025, in accordance with clause 75A of Schedule 1 of the RMA, for a direction to use the streamlined planning process to prepare an Auckland Housing Planning Instrument, that seeks:
 - i) approval to notify the replacement plan change in clause b) above
 - ii) a notification date of 30 October 2025

- iii) that there be a “friend of submitter” appointed to assist submitters in making submissions
- iv) a submission period from 3 November to 19 December 2025
- v) that there be hearings held on submissions in a timeframe that ensures submitters have genuine and adequate opportunity to be heard by the Independent Hearings Panel..
- e) tono / request staff to prepare the public notice giving public notice of the withdrawal of Plan Change 78: Intensification in part, no later than 10 October 2025.
- f) tuhi tīpoka / note that the plan-enabled capacity achieved in the draft replacement plan change is modelled as exceeding 2 million homes.
- g) tuhi tīpoka / note Auckland Council’s firm position that the outcomes for Aucklanders are more important than meeting a theoretical housing capacity target and that the Independent Hearing Panel and Auckland Council (as final decision maker) must be able to focus on achieving the best outcomes for Auckland through the final form of plan-enabled housing capacity.
- h) tuhi tīpoka / note that urban design controls and Auckland Council’s Urban Design Panel are critical to ensuring the liveability of Auckland as it grows, and the intention for the Urban Design Panel to be adequately resourced to respond to the plan change once operative.
- i) tono / request of the Minister that when determining the expertise of the independent hearings commissioners, that this includes urban design, architecture, planning, infrastructure, economics and law.
- j) tono / request advice in the new term of council on the impacts of the former Government’s removal of the ability of councils to include minimum carpark requirements in their planning documents, with a focus on areas without access to good public transport.
- k) tono / request that the Mayor reiterate to Ministers that in relation to greenfields:
 - i) Auckland Council’s 2024-2034 Future Development Strategy provides for 15,000 hectares of Future Urban Zoned land over 30 years, of which around one third has already been zoned for urban development
 - ii) only residential and business zoned land is counted towards plan-enabled capacity under the National Policy Statement of Urban Development – this does not include Future Urban Zoned land
 - iii) provision of infrastructure requires planning and sequencing, not just delivery
 - iv) currently, growth does not pay for growth, rather all ratepayers are subsidising the cost of greenfield infrastructure
 - v) it is more efficient to utilise existing infrastructure in urban areas than build new infrastructure in greenfields
 - vi) that Auckland Council looks forward to the Government’s promised new funding and financing tools, including Development Levies, that will ensure that growth pays for growth.
- l) whakaū / confirm the 21 August 2025 package of planning controls for the 10 and 15 storey Terraced Housing and Apartment Building zoned areas, which includes the Height in Relation to Boundary controls.

MOVED by Cr C Fletcher, seconded by Cr M Williamson an amendment by way of replacement:

That the Policy and Planning Committee:

- a) whakaae / agree to withdraw Plan Change 78: Intensification in part, except as it relates to the Business-Metropolitan Centre zone and related precincts (excluding Westgate and New Lynn precincts) and qualifying matters, for the following reasons:
 - i) natural hazard down-zoning and changes to rules and policies can be achieved more quickly and simply through a single process
 - ii) the Medium Density Residential Standards can be removed
 - iii) the spatial distribution of plan-enabled capacity is more aligned with the compact city approach and infrastructure investment and affordability
 - iv) infrastructure providers have greater ability to plan and prioritise investment with a more targeted spatial distribution.
- b) whakaae / approve in principle the draft replacement plan change for notification as described in Attachments O – UU, noting that further changes may occur following further consultation and community engagement prior to notification, subject to the responsible Minister issuing a direction to use the streamlining planning process and the Minister approving further consultation and engagement as part of that process.
- c) tāpae / delegate authority to the Chief Executive to make amendments to the draft replacement plan change as a result of further consultation and community engagement, and to correct any errors and anomalies with the draft replacement plan change, provided the Minister approves further consultation and engagement as part of the streamlined planning process.
- d) tono / request staff to notify the responsible Minister by 10 October 2025, in accordance with clause 75A of Schedule 1 of the RMA, for a direction to use the streamlined planning process to prepare an Auckland Housing Planning Instrument, that seeks:
 - i) three months for further consultation, community engagement and amendments to be made to the draft replacement plan change, and further modelling to be undertaken, noting the requirement for the draft replacement plan change to provide as much housing capacity as would have been enabled if PC78 (as notified) was made operative
 - ii) approval to notify the replacement plan change
 - iii) a notification date of 01 March 2026 for the draft plan change to allow for further consultation, community engagement, amendments to be made to the draft replacement plan change, and further modelling to occur as set out in clause d) i) above.
 - iv) that there be a “friend of submitter” appointed to assist submitters during the consultation period and in making submissions.
 - v) notification date of 01 March 2026 for the plan change followed by a submission period from 01 March to 31 May 2026
 - vi) that there be hearings held on submissions to be held by the Streamlined Planning Process panel (to be appointed).
- e) tono / request staff to prepare the public notice giving public notice of the withdrawal of Plan Change 78: Intensification in part, no later than 10 October 2025

A division was called for, voting on which was as follows:

<u>For</u>	<u>Against</u>	<u>Abstained</u>
Cr C Fletcher	Houkura Member E Ashby	
Cr M Lee	Cr A Baker	
Cr D Newman	Cr J Bartley	
Cr S Stewart	Mayor W Brown	
Cr K Turner	Deputy Chairperson A Dalton	
Cr W Walker	Cr C Darby	
Cr J Watson	Cr J Fairey	
Cr M Williamson	Cr A Filipaina	
	Cr L Fuli	
	Houkura Member T Henare	
	Cr S Henderson	
	Chairperson R Hills	
	Cr K Leoni	
	Cr G Sayers	
	Deputy Mayor D Simpson	

The motion was declared LOST by 8 votes to 15.

Debate on the original motion continued.

At 3.56pm it was:

Extension of Meeting Time

Resolution number PEPCC/2025/143

MOVED by Chairperson R Hills, seconded by Cr W Walker:

That the Policy and Planning Committee:

- a) **whakaae / agree pursuant to standing order 1.1.3 that an extension of time until the business of the agenda is complete be granted.**

CARRIED

Note: further changes were made to the original recommendation, adding clause m), as a Chair's recommendation.

The substantive motion was put.

Resolution number PEPCC/2025/144

MOVED by Chairperson R Hills, seconded by Mayor W Brown:

That the Policy and Planning Committee:

- a) **whakaae / agree to withdraw Plan Change 78: Intensification in part, except as it relates to the Business-Metropolitan Centre zone and related precincts (excluding Westgate and New Lynn precincts) and qualifying matters, for the following reasons:**
 - i) **natural hazard down-zoning and changes to rules and policies can be achieved more quickly and simply through a single process**
 - ii) **the Medium Density Residential Standards can be removed**
 - iii) **the spatial distribution of plan-enabled capacity is more aligned with the compact city approach and infrastructure investment and affordability**
 - iv) **infrastructure providers have greater ability to plan and prioritise investment with a more targeted spatial distribution.**

- b) **whakaae / approve the draft replacement plan change for notification as described in Attachments O – UU, subject to the responsible Minister issuing a direction to use the streamlining planning process.**
- c) **tāpae / delegate authority to the Director Policy, Planning and Governance to correct any errors and anomalies with the draft replacement plan change prior to notification.**
- d) **tono / request staff to notify the responsible Minister by 10 October 2025, in accordance with clause 75A of Schedule 1 of the RMA, for a direction to use the streamlined planning process to prepare an Auckland Housing Planning Instrument, that seeks:**
 - i) **approval to notify the replacement plan change in clause b) above**
 - ii) **a notification date of 30 October 2025**
 - iii) **that there be a “friend of submitter” appointed to assist submitters in making submissions**
 - iv) **a submission period from 3 November to 19 December 2025**
 - v) **that there be hearings held on submissions in a timeframe that ensures submitters have genuine and adequate opportunity to be heard by the Independent Hearings Panel..**
- e) **tono / request staff to prepare the public notice giving public notice of the withdrawal of Plan Change 78: Intensification in part, no later than 10 October 2025.**
- f) **tuhi tīpoka / note that the plan-enabled capacity achieved in the draft replacement plan change is modelled as exceeding 2 million homes.**
- g) **tuhi tīpoka / note Auckland Council’s firm position that the outcomes for Aucklanders are more important than meeting a theoretical housing capacity target and that the Independent Hearing Panel and Auckland Council (as final decision maker) must be able to focus on achieving the best outcomes for Auckland through the final form of plan-enabled housing capacity.**
- h) **tuhi tīpoka / note that urban design controls and Auckland Council’s Urban Design Panel are critical to ensuring the liveability of Auckland as it grows, and the intention for the Urban Design Panel to be adequately resourced to respond to the plan change once operative.**
- i) **tono / request of the Minister that when determining the expertise of the independent hearings commissioners, that this includes urban design, architecture, planning, infrastructure, economics and law.**
- j) **tono / request advice in the new term of council on the impacts of the former Government’s removal of the ability of councils to include minimum carpark requirements in their planning documents, with a focus on areas without access to good public transport.**
- k) **tono / request that the Mayor reiterate to Ministers that in relation to greenfields:**
 - i) **Auckland Council’s 2024-2034 Future Development Strategy provides for 15,000 hectares of Future Urban Zoned land over 30 years, of which around one third has already been zoned for urban development**
 - ii) **only residential and business zoned land is counted towards plan-enabled capacity under the National Policy Statement of Urban Development – this does not include Future Urban Zoned land**
 - iii) **provision of infrastructure requires planning and sequencing, not just delivery**

- iv) currently, growth does not pay for growth, rather all ratepayers are subsidising the cost of greenfield infrastructure
 - v) it is more efficient to utilise existing infrastructure in urban areas than build new infrastructure in greenfields
 - vi) that Auckland Council looks forward to the Government's promised new funding and financing tools, including Development Levies, that will ensure that growth pays for growth.
- l) whakaū / confirm the 21 August 2025 package of planning controls for the 10 and 15 storey Terraced Housing and Apartment Building zoned areas, which includes the Height in Relation to Boundary controls
- m) tāpae / delegate authority to the Chief Executive, to approve a council submission on Plan Change 120 that does not include policy shifts but includes, and is not limited to, addressing any errors and anomalies that are identified following notification.

A division was called for, voting on which was as follows:

<u>For</u>	<u>Against</u>	<u>Abstained</u>
Houkura Member E Ashby	Cr C Fletcher	
Cr A Baker	Cr M Lee	
Cr J Bartley	Cr K Turner	
Mayor W Brown	Cr W Walker	
Deputy Chairperson A Dalton	Cr J Watson	
Cr C Darby		
Cr J Fairey		
Cr A Filipaina		
Cr L Fuli		
Houkura Member T Henare		
Cr S Henderson		
Chairperson R Hills		
Cr K Leoni		
Cr D Newman		
Cr G Sayers		
Deputy Mayor D Simpson		
Cr S Stewart		
Cr M Williamson		

The motion was declared CARRIED by 18 votes to 5.

CARRIED

Note: Under Standing Order 1.8.6, the following members requested that their dissenting votes be recorded as follows:

- Cr C Darby against clause j)
- Cr S Henderson against to l)

Note: Under Standing Order 1.8.6, the following members requested that their votes in support of clause a) be recorded:

- Cr C Fletcher
- Cr M Lee
- Cr K Turner
- Cr W Walker
- Cr J Watson

Attachments

- A 24 September 2025, Policy and Planning Committee, Item 7 - Decision-making on the withdrawal of Plan Change 78 - Intensification and notification of a replacement plan change - Draft Replacement Plan Change 120 s32 Overview Evaluation
- B 24 September 2025, Policy and Planning Committee, Item 7 - Decision-making on the withdrawal of Plan Change 78 - Intensification and notification of a replacement plan change - Draft Replacement Plan Change 120 s32 Economic Matters
- C 24 September 2025, Policy and Planning Committee, Item 7 - Decision-making on the withdrawal of Plan Change 78 - Intensification and notification of a replacement plan change - Draft Replacement Plan Change Housing Capacity Results
- D 24 September 2025, Policy and Planning Committee, Item 7 - Decision-making on the withdrawal of Plan Change 78 - Intensification and notification of a replacement plan change - presentation

8 Te Whakaaro ki ngā Take Pūtea e Autaia ana | Consideration of Extraordinary Items

There was no consideration of extraordinary items.

4.56pm

The chairperson thanked members for their attendance and attention to business and declared the meeting closed.

CONFIRMED AS TRUE AND CORRECT BY THE
CHAIRPERSON AND CHIEF EXECUTIVE UNDER
STANDING ORDER 8.1.4 ON

DATE:.....

CHAIRPERSON:.....

**CHIEF EXECUTIVE OR
NOMINEE:**.....

Auckland Unitary Plan – Local board views on the withdrawal in part of Proposed Plan Change 78 - Intensification and draft replacement plan change

Te take mō te pūrongo

Purpose of the report

1. To enable the local board to provide its views to the Governing Body (via the Policy and Planning Committee) on:
 - a) the withdrawal in part¹ of Proposed Plan Change 78 - Intensification
 - b) the draft replacement plan change included as Attachments A-F.

Whakarāpopototanga matua

Executive summary

2. Enabling significant opportunities for development, in particular housing in the right places, is a fundamental aspect of the Auckland Unitary Plan (AUP). Under the previous government, the council was required to make widespread changes to the AUP to enable even greater levels of intensification. The resulting changes to the AUP were included in Proposed Plan Change 78 – Intensification (PC78) notified in August 2022.
3. Since early 2023, the Policy and Planning Committee (via the Mayor, and the Chair and Deputy Chair of the Policy and Planning Committee) have strongly advocated to central government for a better way to enable even more development than the AUP already provides for, while addressing risks from natural hazards such as flooding and coastal erosion/inundation.
4. The very recently enacted Resource Management (Consenting and Other System Changes) Amendment Act enables the council, if it chooses, to withdraw in part, PC78, provided the council notifies a replacement plan change that satisfies new requirements. The council had previously been unable to withdraw PC78 (in whole or in part).
5. On 21 August 2025 the Policy and Planning Committee endorsed a draft replacement plan change to enable staff to consult on it with iwi authorities, government ministries and adjoining councils, and to request local board views on the draft replacement plan change and a corresponding withdrawal in part of PC78. Due to the timeframes set by central government in the Resource Management (Consenting and Other System Changes) Amendment Act, the council will need to decide in September 2025 whether or not to withdraw from PC78 and, if so, to proceed with a replacement plan change.
6. Consultation feedback and local board views will be reported at a meeting of the Policy and Planning Committee in September 2025.

Ngā tūtohunga

¹ The City Centre zone provisions within PC78 have been heard and decided so can no longer be withdrawn.

Recommendation/s

That the **XX** Local Board:

- a) provides its views on:
 - i) the withdrawal in part of Proposed Plan Change 78 - Intensification
 - ii) the draft replacement plan change included as Attachments A-F.

Horopaki Context

Introduction

7. Enabling significant opportunities for development, in particular housing in the right places, is a fundamental aspect of the AUP. Under the previous government, the council was required to make widespread changes to the AUP to enable even greater levels of intensification. The resulting changes to the AUP were included in Proposed Plan Change 78 – Intensification (PC78) notified in August 2022.
8. Since early 2023, the Policy and Planning Committee (via the Mayor, and the Chair and Deputy Chair of the Policy and Planning Committee) have strongly advocated to central government for a better way to enable even more development than the AUP already provides for, while addressing risks from natural hazards such as flooding and coastal erosion/inundation.
9. The Resource Management (Consenting and Other System Changes) Amendment Act enables the council, if it chooses, to withdraw in part, PC78, provided that the council notifies a replacement plan change that satisfies new requirements. The council had previously been unable to withdraw PC78 (in whole or in part).
10. On 21 August 2025 the Policy and Planning Committee endorsed a draft replacement plan change to enable staff to consult on it with iwi authorities, government ministries and adjoining councils, and to request local board views on the draft replacement plan change and a corresponding withdrawal in part of PC78. Due to the timeframes set by central government in the Resource Management (Consenting and Other System Changes) Amendment Act, the council will need to decide in September 2025 whether or not to withdraw PC78 and, if so, to proceed with a replacement plan change.
11. Consultation with iwi authorities is a legal prerequisite for any plan change. Consultation with adjoining councils and government ministries is also mandatory. The council must consider any views and preferences expressed by a local board, if the decision affects or may affect the responsibilities or operation of the local board or the well-being of communities within its local board area. Consultation feedback and local board views will be reported at a meeting of the Policy and Planning Committee in September 2025.

Different plan making context for PC78 and any replacement plan change

12. The statutory settings for PC78 differ from how the council normally undertakes plan changes. Particular legal requirements apply to PC78, for example:
 - Ministerial directions apply
 - the span of the council's decision-making is constrained compared to the usual plan-making process under the Resource Management Act (RMA)
 - the council cannot fully address significant risks from natural hazards.

13. Consultation remains a mandatory requirement for any replacement plan change.
14. The latest RMA amendments:
 - enable the council to withdraw PC78 (in whole or in part) which would then trigger a mandatory replacement plan change
 - make any replacement plan change subject to different legal requirements, in particular, any replacement plan change **must enable the same or more capacity for development as PC78**
 - constrain the span of the council's decision-making compared to the usual plan-making process under the RMA
 - enable the council to fully address risks from natural hazards.
15. Two key procedural factors of relevance to this report are:
 - the limited window in which the council can decide whether to withdraw PC78: between the day the RMA amendments commence, and 10 October 2025
 - the mandatory requirement to consult on a draft replacement plan change with iwi authorities, government ministries and adjoining councils and to obtain local board views, before deciding whether to approve a proposed replacement plan change for notification (after seeking a direction from the relevant Minister).

Different timing for consultation driven by legislation and timeframes

16. The very recently enacted Resource Management (Consenting and Other System Changes) Amendment Act provides Auckland Council with specific provisions to withdraw PC78 (in whole or in part) and replace it with a new plan change.
17. Staff have been unable to formally consult on any replacement plan change until the RMA amendments became law. Given delays in the Parliamentary process, these amendments have only just become law, but the council is required to make a decision on notification of a replacement plan change by 10 October 2025.
18. This means the Governing Body has very little time to consult with iwi, ministries and adjoining councils, and to seek the views of local boards, before making a decision on whether or not to withdraw in part PC78 and notify a replacement plan change.

Draft replacement plan change

19. With feedback from the Policy and Planning Committee, staff have prepared a draft replacement plan change to meet the requirements they understood would be included in amendments to the RMA. It also provides for improved management of development in areas affected by natural hazards. The draft replacement plan change is included in Attachments A to F. Note that draft replacement plan change planning maps at Attachment F have been provided for your local board area only.
20. Relative to PC78, in the draft replacement plan change:
 - a) there are stronger controls relating to managing risks from flooding, coastal hazards, landslides and wildfires
 - b) there are changes to the zoning (down-zoning) of properties that are at the highest risk from flooding and coastal hazards
 - c) Medium Density Residential Standards (MDRS) have been replaced with different/improved standards
 - d) there is an increase in the amount of land zoned for two-storey medium density housing (the Residential – Mixed Housing Suburban Zone)

- e) there is a reduction in the amount of land zoned for three-storey medium density housing (the Residential – Mixed Housing Urban Zone)
- f) building heights of up to 10 storeys are generally enabled in 23 walkable catchments around Rapid Transit Stops, except where qualifying matters apply
- g) building heights of up to 15 storeys are generally enabled in 21 walkable catchments around Rapid Transit Stops, except where qualifying matters apply
- h) outside of walkable catchments, building height controls for most of the Residential - Terrace Housing and Apartment Buildings Zone are increased to enable buildings of six storeys (up from five storeys), with a more permissive height in relation to boundary control
- i) the area of land zoned for the Terrace Housing and Apartment Buildings zone around 14 town centres is increased (within generally 200 metres to 400 metres of the edge of the Town Centre zone)
- j) the area of land around 11 additional town centres and local centres is zoned for Terrace Housing and Apartments Buildings zone (within generally 200 metres of the edge of the Town Centre zone or Local Centre zone)
- k) sites within approximately 200 metres either side of 24 corridors on Auckland Transport's Frequent Transport Network is zoned Terrace Housing and Apartment Buildings zone
- l) intensification requirements have been applied to the previously excluded Auckland Light Rail Corridor, to give effect to policies 3 and 4 of the National Policy Statement on Urban Development (NPS-UD) and the specific intensification requirements set out in the RMA amendment for increased building heights in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Ave and Mount Albert; except where qualifying matters apply
- m) removing additional areas of special character that are currently identified in the AUP, in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland and Morningside
- n) to give effect to the New Zealand Coastal Policy Statement and the Regional Policy Statement, a new qualifying matter has been applied to a small number of walkable catchments and NPS-UD policy 3(d) locations to make the building heights or density requirements less enabling of development.

Tātaritanga me ngā tohutohu

Analysis and advice

21. The purpose of this report is limited to seeking the local board's views on:
 - a) the withdrawal in part of Proposed Plan Change 78 - Intensification
 - b) the draft replacement plan change included as Attachments A-F.
22. In considering a), it is important to note that:
 - a) should the council not withdraw PC78, it will be required to:
 - i) prepare and notify a variation to PC78 for the missing 'Auckland Light Rail Corridor' between the city centre and Māngere as soon as possible
 - ii) seek an extension of time for the hearings and decision-making on PC78 from the Minister for Resource Management Reform (currently 31 March 2026)

- iii) prepare evidence and, along with the many submitters, attend hearings before the PC78 independent hearings panel
 - iv) consider developing an interim plan change that partially strengthens the rules in the AUP relating to natural hazards
 - v) receive recommendations from the independent hearings panel and make decisions on those recommendations:
 - any recommendations accepted by the council cannot be appealed to the Environment Court
 - any recommendations rejected by the council would be referred to the Minister for Resource Management Reform for a decision.
- b) should the council withdraw PC78
- i) it will be required to make a decision by 10 October 2025 to notify a replacement plan change
 - ii) the replacement plan change must enable the same or more capacity for development as PC78
 - iii) the Minister for Resource Management Reform will determine detailed matters relating to the submissions and hearings process after considering the council's views
 - iv) an independent hearings panel would be appointed jointly by the council and the Minister for Resource Management Reform to hear submissions and make recommendations to the council:
 - any recommendations accepted by the council cannot be appealed to the Environment Court
 - any recommendations rejected by the council can be appealed to the Environment Court.

Tauākī whakaaweawe āhuarangi

Climate impact statement

23. The council's climate goals are set out in Te Tāruke-ā-Tāwiri: Auckland's Climate Plan:
- to reduce greenhouse gas emissions to reach net zero emissions by 2050
 - to prepare the region for the adverse effects of climate change (e.g. increased risk from natural hazards such as flooding and coastal erosion/inundation).
24. The local board may wish to express its views on:
- a) whether withdrawing in part PC78 has a positive, neutral or negative impact in terms of climate-related matters
 - b) climate-related matters associated with the draft replacement plan change.

Ngā whakaaweawe me ngā tirohanga a te rōpū Kaunihera

Council group impacts and views

25. Views and infrastructure constraints and opportunities have been taken into account. Auckland Urban Development Office, Auckland Transport and Watercare Services Limited staff contributed to confidential workshops in which potential choices, risks and

mitigations were discussed. Staff within the council have similarly contributed, led by Planning and Resource Consents, but also including Policy, Chief Economist's Office, Legal and Healthy Waters and Flood Resilience.

Ngā whakaaweawe ā-rohe me ngā tirohanga a te poari ā-rohe

Local impacts and local board views

26. The purpose of this report is to obtain the views of the local board on the draft replacement plan change and associated withdrawal in part of PC78.
27. Local board chairs and portfolio leads were invited to participate in the seven Policy and Planning Committee workshops regarding development of a potential replacement plan change (held on 9, 16 and 30 April, 14 and 23 May, 25 June, and 6 August 2025).
28. All local board members were briefed on the replacement plan change at an elected members' briefing on 18 July 2025. Local boards were updated on 8 August 2025 on the results of capacity modelling completed for a mid-June version of a draft replacement plan change. The second briefing addressed:
 - additional changes required to address issues with capacity for development
 - changes to the provisions of the draft replacement plan change to manage the increased levels of intensification
 - application of additional qualifying matters that limit intensification in some places
 - a review of the draft replacement plan change map viewer for local board areas, which has since been updated further.
29. The views of the local board will be provided at a meeting of the Policy and Planning Committee in September 2025.

Tauākī whakaaweawe Māori

Māori impact statement

30. Many issues raised by iwi authorities in consultation on PC78, and raised in iwi authorities' PC78 submissions, may remain relevant to any replacement plan change. As the replacement plan change would be a new plan change subject to different statutory requirements, it creates new council obligations for consultation with iwi authorities and participation. Iwi authorities may identify new matters. This requires a fresh approach informed by lessons learnt.
31. Consultation with iwi authorities on how the AUP manages natural hazards started with hui in late 2023, progressing to hui on a possible replacement plan change on 21 and 22 July 2025. The consultation process is ongoing, and it is necessary to provide iwi authorities with the draft replacement plan change to enable this to continue.
32. Outcomes of iwi authorities' consultation on natural hazard matters, including issues of concern, were twice reported to the council before decision making and notification of PC78 in 2022 (Planning Committee reports 30 June 2022 and 4 August 2022).
33. Houkura members and secretariat staff were invited to the confidential workshop series to date on 9, 16 and 30 April, 14 and 23 May, 25 June, and 6 August 2025.

Ngā ritenga ā-pūtea

Financial implications

We need to exercise caution with all financial decisions and ensure up-to-date financial advice.

Requirement for all council staff (does not apply to CCO staff)

For any report that have financial implications (including the spend of any money), you must seek input and advice from:

- Commercial Managers for committee reports
- Lead Financial Advisers for local board reports

Elected members have set an expectation that all advice received is coherent (aligned to our strategic direction), coordinated (given in the context of other work across council group) and robust (provides all the information elected members need to know to understand the consequences of the decision they are being asked to make). If this advice is asking for a decision from our elected members, you must notify the relevant Investment Area Lead (details on Kotahi) to support this practise.

Instructions

To author: You must add an internal note here that you have gained agreement from relevant Finance staff on the financial implications of your advice.

To authorisers: Please check that confirmation of agreement from relevant Finance staff is included.

To DA or GA: After compiling the agenda please delete all highlighted text before publishing.

34. There are no financial implications associated with the local board providing its views on the matters discussed in this report.

Ngā raru tūpono me ngā whakamaurutanga

Risks and mitigations

35. The draft replacement plan change proposes significant changes to the urban parts of the AUP. A key requirement (set by central government) has been to achieve the same or more capacity for development as PC78. Therefore, both PC78 and the draft replacement plan change both provide significantly more enabled capacity for development than the AUP.
36. The draft replacement plan change is intended to distribute this capacity across Tāmaki Makaurau / Auckland in a more focused way with different implications in different locations. There has been limited time to develop provisions and to test them. Given the timeframes, there is limited time available to undertake consultation with iwi authorities, and there is insufficient time for engagement with the public.
37. The council has previously sought to engage with the public on significant draft plan changes: the absence of wider consultation creates a reputational risk. If a subsequent decision is made to withdraw in part PC78 and notify a replacement plan change, an extended timeframe for making submissions would be recommended when seeking directions from the Minister for Resource Management Reform. It would also be important to undertake a significant communications and engagement campaign to ensure Aucklanders know about the proposed replacement plan change and the opportunity to inform the final outcome by making a submission.

Ngā koringa ā-muri

Next steps

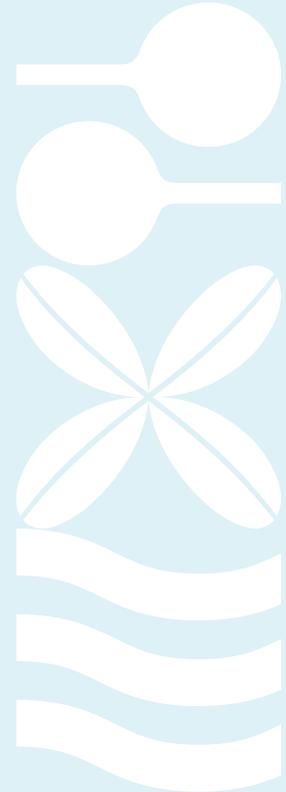
38. The views of local boards, and any feedback from iwi authorities, central government ministries and adjacent councils will be provided at a Policy and Planning Committee

meeting in September 2025. If the committee agrees to withdraw in part and replace PC78, the proposed replacement plan change will be notified for submissions in late October 2025.

39. Once submissions have closed, staff will prepare a summary and report back to the local board so it can express its views to the independent hearings panel.

Ngā tāpirihanga

Attachments



Governance and Engagement Department

E mahi ana mātou i te mahi mō Tāmaki Makaurau

Auckland Unitary Plan – Local board views on the withdrawal in part of Proposed Plan Change 78 - Intensification and draft replacement plan change

September 2025



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Albert-Eden Local Board

Resolution number AE/2025/156

That the Albert-Eden Local Board:

- a) tuku / provide the following views on the withdrawal in part of Proposed Plan Change 78 – Intensification.
- b) agree that there are significant issues with Proposed Plan Change 78 – Intensification including:
 - i) lack of ability to adequately manage natural hazards, which is a significant issue for Albert-Eden relating to flooding
 - ii) the blanket approach to enabling development provided by the Medium Density Residential Standards, which is not strategic or reflective of different local Auckland communities
 - iii) the lack of provisions in the light rail corridor, which needs to be rectified following the cancellation of the light rail project.
- c) tuku / provide the following views on the draft replacement plan change documents contained in the agenda report.

Replacement plan change – process

- d) note concern about the condensed and inadequate timelines for community, staff and elected members to work through this matter.
- e) support the principle of intensified housing adjacent to the City Rail Link and principal stations including Maungawhau, Morningside and Kingsland.
- f) does not support directives which remove the ability for local communities to be involved in discussions, planning and decision-making processes relating to their neighbourhoods and the future of their areas.
- g) request a process of full consultation is undertaken on how to achieve increased development along the strategic transport network, so Aucklanders are able to determine the future of their own city and its development, and pathways to achieve this over time.
- h) note that no provisions were notified within the light rail corridor under Proposed Plan Change 78 – Intensification, so approximately 45,000 homes have not had the opportunity to provide input into that process at all but now have significant changes proposed for that area.
- i) request that any replacement plan change is undertaken through the Auckland Unitary Plan review, a full public consultation is undertaken, and due process is followed.

Replacement plan change – level of development provided

- j) does not support the intention to provide for a further 2 million houses over the next 30 years, noting that the current Auckland Unitary Plan provides for 900,000 houses during that period, and this is considered sufficient to cater for Auckland's future growth.
- k) does not support the level of intensification to 15 storeys around rapid transit stations, for example, Maungawhau, Morningside, Kingsland, Greenlane station.
- l) does not support the level of intensification to 10 storeys around rapid transit stations, for example, Mount Albert and Baldwin station.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- m) support including qualifying matters in any replacement plan change, including:
 - i) built heritage and character, including historic heritage and special character areas
 - ii) hazards, including coastal erosion and flood plains
 - iii) infrastructure, including combined wastewater network
 - iv) natural heritage and resource, including significant ecological areas, regional maunga viewshafts and height and building sensitive areas, notable trees and ridgeline protection.
- n) note particular concern about 400-metre Terrace Housing Apartment Building (THAB) zones along all arterial roads, in addition the largest zoning outside of THAB is Mixed Housing Urban, which carries significant implications for density, infrastructure and neighbourhood character.
- o) request confirmation from Healthy Waters, Watercare and Auckland Transport regarding infrastructure capacity and funding before any plan change is endorsed.
- p) support staff recommendation for an extended timeframe for making submissions and a significant communications and engagement campaign to ensure Aucklanders know about the proposed replacement plan change and the opportunity to inform the final outcome by making a submission.
- q) request that all special character areas and historic heritage areas in the Auckland Unitary Plan are retained in any replacement plan change and that the local board encourages the community to share their views on retention or removal of these protections through the submission process.
- r) request the retention of the special character area and the introduction of a historic heritage overlay for the area known as the 'Bellwood estate', as outlined in the tabled submission, being the area surrounding Bellwood Avenue, Mount Eden.
- s) request any replacement plan change has improved controls to manage the interface between high density (for example, 10 or 15 storey areas) and lower density (for example, Special Character, Single House, Residential Mixed-Housing Suburban zones), which is a particular issue around Mount Albert, Kingsland and Maungawhau stations.
- t) request additional controls to manage shading and over-bearing of low density from any high density zones.
- u) request a stronger approach is taken to limit development in flood prone areas, to ensure property and people are protected from developing in known areas of risk.
- v) request the following points identified during the Proposed Plan Change 94 (Private): Wairaka Precinct hearing process are added to any replacement plan change:
 - i) request that the south-eastern corner of the Unitec site is mapped and protected by an overlay for Significant Ecological Area and Significant Natural Area as supported in the Addendum Hearings Report for Private Plan Change 94 (pp 171-174) (Terrestrial Ecology)
 - ii) updating the notable trees to reflect any trees already removed as approved via fast-track consents and include additional trees as referenced in the Auckland Council Arborist report prepared for Private Plan Change 94
 - iii) scheduling Penman House and three other heritage buildings as identified in the Build Heritage Review report prepared for Private Plan Change 94 for historic heritage protection.
- w) request Chapter B.2.3.i includes a new objective for a well-functioning urban environment that requires the provision of adequate open space.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- x) request Murray Halberg Park and the other land ownership swaps and changes between Kāinga Ora and Auckland Council in Ōwairaka are rectified and zoned Open Space – Sport and Recreation Zone and Terrace Housing and Apartment Building (THAB) respectively which were previously raised in Plan Change 96: Open Space and Other Rezoning Matters (2024).
- y) note that the rail crossings removal programme as a result of the City Rail Link may change what can be considered a walkable catchment around train stations, and that this should be considered in both the plan change process and the development of options for the rail crossings removal programme.
- z) request that council again provide a 'Friend of the Submitter' service to assist people with the process of submitting to the notified plan change, noting that only matters raised in a submission can be considered by the Independent Hearings Panel.
- aa) request that the board's resolutions are circulated to all other local boards for their information and consideration.
- bb) write to Prime Minister Rt Hon. Chris Luxon, Rt Hon. Chris Bishop, Minister of Housing, Rt Hon. Simeon Brown, Minister for Auckland, Rt Hon. David Seymour, Deputy Prime Minister and MP for Epsom, Helen White MP for Mt Albert, and Carlos Cheung MP for Mt Roskill, outlining the local board's concerns and requesting that these be addressed in the current planning and housing policy framework.
- cc) thank Celia Davison - Manager Planning - Central/South, and Noel Reardon - Manager Heritage, for their advice and attendance online via Microsoft Teams.

Devonport-Takapuna Local Board

Resolution number DT/2025/181

That the Devonport-Takapuna Local Board:

- a) tautoko / support the withdrawal of Proposed Plan Change 78 - Intensification with a draft replacement plan change as outlined in Attachments A-F of the agenda report, with the following feedback:
 - a) tautoko / support the stronger requirements included in the replacement PC78 which seek to mitigate the risks of natural hazards. This is welcomed by our community who were affected by severe flooding in the January 2023 flooding event.
 - b) tautoko / support downzoning areas impacted by coastal erosion/inundation and encourage that housing development in risky coastal environments are avoided, noting that the Devonport Takapuna Local Board comprises of 26km of coastline.
 - c) tautoko / support the removal of MDRS from the PC78 replacement
 - d) tautoko / support an increase in land zoned for two story medium density housing
 - e) tautoko / support building heights of up to 10 stories in 23 walkable catchments around Rapid Transit Stops, except in flood zones or areas susceptible to coastal erosion, such as Sunnynook. Walkable catchments within the Devonport-Takapuna Local Board area are Sunnynook, Smales Farm, and Takapuna.
 - f) tono / request additional consideration to increase capacity around Smales Farm and limit capacity around Sunnynook
 - g) tautoko / support building heights of 15 stories in 20 of the 21 walkable catchments around Rapid Transit Stops, excluding Sunnynook due to the area being a flood zone
 - h) tuhi tīpoka / note that the walkable catchments within the Devonport-Takapuna Local Board area are Sunnynook, Smales Farm, and Takapuna.
 - i) strongly support the New 'Coastal Character Qualifying Matter' in residential areas approximately 100m back from the coast inside walkable catchments, where Residential – Terrace Housing and Apartment Buildings Zone has been changed to either Mixed Housing Suburban or Mixed Housing Urban zone. This will prevent tall buildings being built hard up against our coast and will prevent inappropriate development in coastal inundation zones
 - j) tono / request that the replacement PC78 is reviewed to put in place better management tools such as height boundaries and set back rules between Terrace Housing and Apartment Buildings Zones (15 storey) and neighbouring single housing zones.
 - k) tono / request set back rules are put in place for buildings greater than 4 storeys in all zones
 - l) tautoko / support the FAR mechanism is used providing there is a setback control for the adjoining buildings
 - m) tono / request a percentage of the development contributions is returned back to the local board area
 - n) tūtohu / recommend extending Belmont town centre zone to include the western side
 - o) tono / request extending the upzoning to 6 storey in Hauraki corner
 - p) tautoko / support a New 'Lake Pupuke Lakeside Qualifying Matter' in Devonport-Takapuna area (zoning change and removal of some additional height in Height Variation Control areas) to recognize the landscape qualities around the lake. This will prevent tall buildings right up against the lake.
 - q) tūtohu / recommend that the Lake Pupuke Lakeside Qualifying Matter be extended to include the properties between The Promenade to Henderson Park to ensure consistency along Lake Pupuke

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- r) tūtohu / recommend properties between Lake Pupuke and the coastline along Hurstmere Rd from Eric Price Ave to the southern end of Henderson Park be single house zone. Intensification should not be enabled here due the narrow land mass, risk of coastal erosion and potential threat to the critical roading infrastructure
- s) tautoko / support Heritage listed buildings, objects, natural features and sites of significance to Māori all remain protected within the Devonport Takapuna Area, this is one of the Government Listed qualifying matters
- t) āhukahuka / acknowledge Devonport is NOT categorised as a walkable catchment near a rapid transit zone or a metropolitan centre and therefore special character homes and buildings in the area receive stronger protection under the new plan change compared to PC78 as the MDRS is no longer applied to all properties as the underlying zone
- u) tuhi tīpoka / note that under PC78 properties where special character did not apply or where single house zone applies under the new plan change, these properties all reverted to MDRS (3 storey, 3 houses with no requirement for resource consent)
- v) tūtohu / recommend that the urban design panel is strengthened to provide confidence to our communities that we are ensuring building designs achieve quality design features
- w) tūtohu / recommend creating an Architecture Design Review panel to ensure architecture design and quality in acceptance with new developments and do not detract from the surrounding areas
- x) āhukahuka / acknowledge there are no changes to the maunga viewshafts in the proposed plan change
- y) tuhi tīpoka / note that Devonport-Takapuna Local Board has 160 homes categorised as Category 3 and offered buyouts. 138 of those homes are in Milford. These are not just houses. Each resident has their own unique experience of the Jan 2023 flooding event and recovery experience over the last 2.5 years.
- z) āhukahuka / acknowledge in this tight housing market, the stress of finding alternative accommodation by the buyout homeowners is affecting the health of those residents.
- aa) tuhi tīpoka / note families and elderly people with Category 3 home buyouts in Milford and Sunnynook are seeking extensions on their settlement dates as they are struggling to find suitable alternative homes.
- bb) āhukahuka / acknowledge that 6042 homes across the North Shore flooded and were assessed by Auckland Council and issued a white, yellow or red sticker as a result of the Anniversary weekend flood event.
- cc) tuhi tīpoka / note the position of the Insurance Council of New Zealand to Devonport Takapuna Local Board (May 2025, letter attached) who caution housing intensification in flood zones. “From an insurance perspective, greater density of housing means more risk for insurers to take on. Higher density in flood-prone locations leads to a higher aggregation of risk to be borne by the insurance industry and may lead to increased premiums.”
- dd) tuhi tīpoka / note the Devonport Takapuna Local Board community members feel frustrated at the limited time for public consultation to input into the proposed PC78 replacement
- ee) ohia / endorse the extended notification period as requested at the extraordinary Policy and Planning Committee meeting on 21 August 2025 (Resolution number PEPCC/2025/123).
- ff) tono / request the Auckland Council Flood Viewer tool is used to determine the flood plain so the public can make decisions about where to purchase and build homes.
<https://experience.arcgis.com/experience/cbde7f2134404f4d90adce5396a0a630>
- gg) tūtohu / recommend the language used to potential consent applicants for development in natural hazard zones is DO NOT build here, rather than AVOID building here.
- hh) tautoko / support sites within approximately 200m either side of the road corridors on Auckland Transport’s Frequent Transport Network is zoned Terraced Housing and Apartment building zone, except in flood plains. Corridors within the Devonport-Takapuna Local Board area are;
 - a. Smales Farm – Takapuna – Milford

E mahi ana mātou i te mahi mō Tāmaki Makaurau

b. Northcote – Takapuna (via Akoranga)

- ii) āhukahuka / acknowledge the work and advocacy the Policy and Planning Committee have achieved since January 2023 for this work to legislatively prevent building homes in flood zones.
- jj) tautoko / support higher controls in the replacement PC 78 that that will be implemented for all resource consents
 - c. tūtohu / recommend consent applications neighbouring or within a flood plain are publicly notifiable
 - d. tūtohu / recommend subdivision development in flood prone areas are avoided.
 - e. tūtohu / recommend that irrespective of whether the development meets the rules of the zone that if they are proposing greater than 75 per cent utilisation of height allowed, they must apply for a resource consent and notify their neighbours
- kk) tūtohu / recommend that the areas impacted by the buy outs in Milford and Sunnynook that suffered significantly by the January 2023 storm be reviewed and downzoned including but not limited to, Stratford Avenue, Seine Rd, Alma Rd, and Nile Road.

Franklin Local Board

Resolution number FR/2025/1

That the Franklin Local Board:

- a) provide the following feedback on the withdrawal in part of Proposed Plan Change 78 – Intensification, and the draft replacement plan change included as Attachments A-F
- b) support changes to Proposed Plan Change 78 to enable further intensification, particularly around transport nodes and metropolitan centres
- c) support the principle of housing intensification around frequent transport nodes, including current train stations and future stations at Drury, Paerata and Ngakaroa
- d) support enabling mixed housing in Waiuku and Pukekohe, however question the areas suggested for Waiuku, noting that areas indicated do not reflect the local context and alternative areas close to the Town Centre may be more appropriate for this level of intensification
- e) recommend that intended intensification in Pukekohe, consider the longstanding request of the board/community for height restrictions on the northern side of King Street to mitigate impact on town centre streetscapes from shade
- f) support the exclusion of Beachlands from further intensification on the basis that the area has specific development limitations including reticulated water supply, waste water treatment options and transport limitations.

Henderson-Massey Local Board

Resolution number HM/2025/130

That the Henderson-Massey Local Board:

- a) whakahei / welcome this opportunity to give feedback on the withdrawal in part of Proposed Plan Change 78 and the draft replacement plan change.
- b) tautoko / support the proposed alternative plan change which will align more closely with the Auckland Unitary Plan.
- c) tuhi tīpoka / note that the proposal aligns closely with several key outcomes in the Henderson-Massey Local Board Plan 2023–2025, particularly around building resilient communities, supporting well-planned housing and urban growth, and preparing for climate change. The proposal also responds directly to concerns raised by our local communities following recent severe weather events, particularly the January 2023 floods.

Support for Natural Hazard Protections

- d) tuhi tīpoka / note that the Henderson-Massey area has been significantly impacted by natural hazards in recent years, especially in Henderson, Rānui, Sunnyvale, and Te Atatū, all of which experienced widespread flooding in 2023.
- e) tautoko / support:
 - i) the proposed more restrictive consenting rules in areas vulnerable to flooding, erosion, and inundation
 - ii) the use of updated natural hazard maps to guide decisions
 - iii) the downzoning of the most at-risk areas to single-house zones, where appropriate
 - iv) the requirement for tighter risk assessments before allowing further development.
- f) tuhi tīpoka / note that the proposal reflects the objectives in our Local Board Plan, particularly Outcome 5: A resilient community and environment, that “people in Henderson-Massey are more resilient to the effects of climate change and natural hazards.”
- g) āhukahuka / acknowledge the community’s concern through various engagements, including feedback from flood recovery hui, climate workshops, and neighbourhood drop-ins, that climate resilience must be central to Auckland’s planning decisions, which is reflected in the proposal.

Support for Focused Housing Growth in the Right Places

- h) tautoko / support intensification of growth in the town centres, particularly around Auckland Central, Metropolitan Centres and inner-city suburbs along the City Rail Link which is essential to enable a more compact city.
- i) tuhi tīpoka / note that Henderson-Massey is one of Auckland’s fastest-growing areas, with the Redhills development and supports growth that is well-integrated, connected to transport, jobs, schools, and services.
- j) tuhi tīpoka / note that the proposal enables this by allowing mid- and high-rise housing (6 to 15 storeys) around the Henderson Metropolitan Centre, train stations like Sturges Road and Sunnyvale, and frequent bus routes such as Lincoln Road and Great North Road.
- k) tautoko / support increased intensification along the frequent transit network corridor only where adequate supporting transport infrastructure can be installed.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- l) tautoko / support growth near existing and future transport infrastructure, aligned with the Western Line and the northwestern rapid transit corridor, but considers the increase of the walkable catchments in Henderson and Rānui too wide.
- m) tuhi tīpoka / note that the proposal supports key aspirations from our Local Board Plan, including Outcome 2: Well-planned neighbourhoods and places, that “everyone has access to quality housing, services, and facilities. New development is well planned and connected to public transport.”
- n) tuhi tīpoka / note that well-planned density will also help deliver thriving, walkable centres and improve outcomes for our younger, more diverse population, many of whom rely on public and active transport.
- o) ātete / opposes further intensification in the unique geographical area of the Te Atatū Peninsula town centre which is constrained by limited transport infrastructure.
- p) āhukahuka / acknowledge that Te Atatū Peninsula has already taken on significant intensification at a disproportionate rate to other areas of the city, so intensification should be focused around Auckland inner suburbs.

Support for Smarter, Targeted Housing Capacity

- q) tautoko / support Auckland Council’s ability to opt out of blanket application of the Medium Density Residential Standards (MDRS) if overall housing capacity requirements are still met.
- r) tuhi tīpoka / note that the proposed plan ensures that Auckland will still provide the same or greater housing capacity as under current rules (approximately 2 million potential homes), and that intensification is targeted, rather than indiscriminate, avoiding growth in hazard-prone or infrastructure-limited areas.
- s) āhukahuka / acknowledge that the Henderson-Massey Local Board has consistently advocated for place-based planning, and this plan is a move in that direction.

Infrastructure

- t) āhukahuka / acknowledge the current infrastructure deficit for development, and that this must be addressed prior to any development proceeding.
- u) tuhi tīpoka / note that plan-enabled capacity needs to be determined to support growth and enable planning and prioritisation of infrastructure to support those growth areas.

Hibiscus and Bays Local Board

Resolution number HB/2025/119

That the Hibiscus and Bays Local Board:

- a) tuku / provide the following feedback to the Governing Body (via the Policy and Planning Committee) on the Auckland Unitary Plan: Withdrawal in part of Proposed Plan Change 78 – intensification and draft replacement plan change:
 - a. do not support any upzoning in intensification anywhere on the Hibiscus Coast subdivision of the Hibiscus and Bays Local Board area noting:
 - i. up-zoning is entirely inappropriate in the current environment where no new developments can connect to the wastewater system due to the Watercare Army Bay wastewater pump station being near capacity and awaiting a renewal
 - ii. any up-zoning, even where development is not actually realisable like this specific situation, will still result in valuations increasing in the next assessment – meaning residents in the up-zoned areas proposed will be paying more in rates for gains that are not able to be realised, which is unduly unfair
 - iii. the plan change proposal for the Hibiscus Coast would result in 5,500 Single House Zone dwellings moving to Mixed Housing Suburban Zone; 6925 Single House Zone dwellings moving to Mixed Housing Urban Zone; and 766 Mixed Housing Suburban Zone dwellings moving to Mixed Housing Urban Zone
 - iv. a more appropriate step forward would be for explicit staging triggers (e.g. network capacity thresholds, project milestones) before any zoning upgrades take effect in these extremely constrained catchments
 - b. do not support any upzoning in intensification in Browns Bay or Mairangi Bay (Mixed Housing Urban Zone to Residential – Terrace Housing and Apartment Buildings Zone (THAB) noting that:
 - i. further intensification areas, as proposed, immediately surround these two low-lying coastal town centres that were devastated in the 2023 Auckland Anniversary floods (which would have been a greater disaster had it been high tide)
 - ii. further intensification presents an unacceptable risk to life and increased infrastructure damage in such a flooding event, by intensifying in areas that would reduce saturation and block flow paths
 - iii. neither of these small coastal towns have direct or rapid transport to central Auckland and instead have ‘feeder buses’ to transport hubs, which we would argue doesn’t meet the standard required for THAB zoning
 - iv. steep gullies, discontinuous and poor paths for all-abilities, and constrained corridors reduce practical walkability to the town centres amenities and transport for some of the proposed THAB zones
 - v. at least one of the proposed THAB zones in Mairangi Bay is within a flood zone which we find entirely inappropriate, even with planning overlays

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- c. note that the coastal settlements noted above (Ōrewa, Whangaparāoa, Browns Bay and Mairangi Bay) are contending with active erosion and coastal hazard management. Enabling more height and density in hazard-prone coastal fringes is inconsistent with risk-reduction and adaptation objectives
 - d. the Hibiscus and Bays Local Board areas have seen housing growth outpacing local employment growth. Up-zoning without a commensurate jobs/transport strategy (including committed corridor capacity) risks longer commutes and greater congestion on already stressed corridors
- b) tuhi tīpoka / note that the local board only received the updated draft replacement plan change planning maps for our local board area at 7:30pm the evening before this 26 August 2025 business meeting
- c) tuhi tīpoka / note, for the public record, that the National Policy Statement on Urban Development (NPS-UD) is the government policy setting that directs councils to remove 'restrictive' planning rules and plan for growth, both up and out. The Auckland Unitary Plan (AUP) guides land development based on this policy setting and Plan Change 78 is Auckland Council's intensification planning instrument to update the AUP as per updates to the NPS-UD. Whilst intensification is not the desire of this local board, the direction comes from government via the NPS-UD.

Howick Local Board

Resolution number HW/2025/169

That the Howick Local Board:

- a) oppose Plan Change 78 (PC78) and the replacement plan change (RPC).
 - i) these plans impose inappropriate, high-intensity zoning in areas that lack supporting infrastructure, threaten the heritage and character of communities of interest, and undermine the wellbeing of existing communities.
 - ii) the Board formally request that Auckland Council initiate a full and transparent review of PC78. The process and outcomes proposed are not acceptable for Aucklanders and our local suburbs.
- b) tuhi tīpoka / note that the Howick Local Board are not the decision-makers on zoning or planning matters and appreciate the opportunity to provide input on this important matter, requesting that our views and those of the communities we serve be considered in full as part of the Policy and Planning Committee's decision-making process.
- c) whakamihi / thank local residents and community organisations who have provided feedback into this process in a short space of time, both in written input and via public forum, as noted in minutes Attachment B.
- d) tuku / provide the following feedback on the withdrawal in Part of Proposed Plan Change 78 – Intensification and the draft plan change as included in Agenda Attachments A to F:
 - i) in regard to the timeline and process used to create the replacement plan change, the Board:
 - A) note that this is the result of legislation and Auckland Council does not get to choose if there is housing intensification or how much, only where:
 - 1) legislation requires Auckland Council to provide the same or higher capacity than Plan Change 78 – there can be no net reduction.
 - 2) legislation allows only two options – continue with Plan Change 78 or replace it with another plan providing the same capacity.
 - B) note that the legislation requires Auckland Council to publicly notify the replacement plan change by 10 October or proceed with Plan Change 78.
 - 1) given that the Act only received Royal Assent on 20 August, this creates an extraordinarily short time frame to develop, consider, and notify a significant change for Auckland's key planning tool.
 - C) note with concern the lack of time for wider public consultation prior to notification and that many local residents will still be unaware of the discussion.
 - D) note that the proximity to the local government elections (as required by legislation) has constrained elected members ability to engage with the community as required by legislation.
 - ii) in regard to the lack of balanced planning, the Board:
 - A) note that the revised plan attempts to meet government housing targets without due regard for environmental, social, and community impacts. Auckland has available

greenfield development opportunities where appropriate infrastructure, including transport, schools, healthcare, and utilities, can be planned and delivered in a coordinated manner. We believe these options have not been adequately explored. The Board also note the following concerns:

- 1) Environmental and community impact: Intensifying existing suburbs without necessary infrastructure (when the infrastructure is already broken or under pressure) puts undue strain on communities, reduces livability, and risks the unique character that makes Auckland attractive. New Zealand is not obliged to replicate international urban models. Our strength lies in our green spaces and lifestyle living, which are highly valued and should be protected.
 - 2) Process concerns: The consultation to date has lacked clarity, transparency and meaningful community engagement & feedback. Residents and stakeholders expect genuine transparency in decision-making, with open communication about options and impacts that affect people's lives.
 - 3) Social infrastructure: healthcare, educational facilities, and other amenities are at capacity
- iii) the Board urge Auckland Council to:
- A) halt further progression of the draft PC78 in its current form
 - B) reconsider growth strategies that better balance housing demand with infrastructure delivery in available greenfield expansion areas
 - C) prioritise protecting the environmental, social, and community values of Auckland's suburbs, not decimating them by focusing on an unrealistic government-driven housing target of 2 million new dwellings.
 - D) re-examine the plan; it is not fit for purpose.
 - E) make the Auckland Unitary plan, as operative, work. The Board support in principle the focus of intensification around existing infrastructure like rapid transit and town centres in line with previous Board feedback.
- iv) in regard to the replacement plan change itself, the Board:
- A) support the removal of Medium Density Residential Standard (MDRS) which has allowed uncontrolled intensification across the city by enabling three homes of up to three storeys high to be built on most residential sites without a resource consent.
 - B) support the return of Single House Zones, particularly around the coastal areas which are under highest risk from flooding and coastal hazards.
 - C) support the strengthening of controls to manage risks from flooding, coastal hazards, landslides and wildfires, giving council greater ability to avoid developments that may create risk.
- v) in regard to the upzoning of Howick Village to a "Business – Town Centre Zone", the Board:
- A) oppose the proposal to upzone Howick Village to a "Business – Town Centre Zone".
 - B) note that on Stockade Hill the existing view shaft protections remain (D20A), but there are some increases around the area which may negatively impact amenity and views to

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the North, South and West. The Board and community still support protection of the 360 degree views.

C) note that the Special Character Business Overlay for Howick remains, providing some protection for properties on Picton St, Fencible Drive, and the top of Uxbridge Road and Wellington Street.

D) note that Howick Village, Howick Beach, Uxbridge Road, Picton Street and Stockade Hill are all notable locations depicting the arrival of Fencible settlers to the area which occurred in 1847. These locations still house significant buildings from this era – Shamrock Cottage and All Saints Church, with graveyards at All Saints, and Star of the Sea Catholic Church. The Howick community values and celebrates its history. Māori still retain strong spiritual and emotional links with Howick and Cockle Bay.

E) note that for many years Howick has successfully retained its “village” persona. The main street shopping strip is popular and profitable for business owners and loved by the locals, with many people have moved to or returned to Howick because of the “village atmosphere.” Its proximity and access to the historic buildings continues to make it a valuable tourist destination. It is popular with tourists, many of whom return to Howick to enjoy this location and is actively promoted by those in the tourism industry.

vi) in regard to the Howick to Botany Frequent Transit Network (FTN) corridor upzoning to Terrace Housing and Apartment Buildings (THAB), the Board:

A) oppose the upzoning of housing along the corridor.

B) note concern that the corridor includes Cockle Bay (including Sandspit Road) which was previously under an infrastructure qualifying matter. Removal of infrastructure constraint impact on Cockle Bay assumes that infrastructure will be upgraded.

C) note that Litten and Sandspit Roads are on a ridgeline which means the visual impact that upzoning will have on the surrounding neighborhood will be higher.

D) note the concern around the lack of data to support upzoning along this corridor between Howick and Botany.

1) The Board understand that this corridor was marginal in terms of its inclusion in the top 26.

E) note that the Howick Beach area is known to have an aging infrastructure. Houses changed from septic tanks to a sewerage system in 1960. Since then, there has been an extreme amount of sub-dividing; the addition of tacked on units, and an assortment of infill housing and multi- unit blocks.

1) the Howick Local Board has dealt with numerous inadequacies around stormwater and flooded creeks causing damage to properties in the area.

2) we are well aware of the flooding issues that lie in the Cockle Bay area (below Sandspit Road/John Gill/Litten – with constant concerns brought to this board and council over many years; and highlighted during applications to build a development in Sandspit Road.

3) the Board note concerns around sewage pollution in waterways, the huge reduction in biomass, and threats to the ecosystem from the soil lost from local streams due to increased water flow and the resulting silt in the ocean.

vii) in regard to Bucklands Beach Peninsula, the Board:

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A) note its concerns about the impact of more housing in the peninsula will have on the already struggling transport network with the only one road in/out of the area already heavily congested.

B) note its concerns that the irregular upzoning in some areas (like Bucklands Beach) may have unintended consequences and suggest that zoning should be more concentrated.

viii) in regard to possible upzoning, the Board suggest the following locations when considering upzoning:

A) along Te Irirangi Drive to acknowledge Airport to Botany rapid transit project.

B) around Botany, Ormiston and Pakuranga Town Centres

C) large Residential – Large Lot Zone around Gracechurch and Chateau Rise to Mixed Housing Suburban Zone as requested by local residents.

ix) in regard to general feedback, the Board:

A) note that parking is already a serious concern of many local residents, with an increasing number of vehicles left on the street. We note that the previous Government removed the parking minimums and the current Government has made no move to return them, leaving council limited powers to influence the provision of car parking.

B) request that the government return the ability of Councils to require off-street parking to reduce a congestion on the roads and allow people to be able to charge electric vehicles.

Kaipātiki Local Board

Resolution number KT/2025/460 That the Kaipātiki Local Board:

- a) express frustration and disappointment that central government is requiring the following:
 - xiii) only allowing the exemption of Medium Density Residential Standard (MDRS) rules and withdrawal of Plan Change 78 (PC78) if an additional 2,000,000 houses are enabled through a new plan change;
 - xiii) limiting Auckland Council’s decision-making ability compared to under the RMA;
 - xiii) setting an incredibly tight timeframe that restricts normal consultation processes;
 - xiii) requiring the Streamlined Planning Process (SPP) to be used.
- s) tuhi tīpoka / note that while PC78 is currently only operative in the central city, the MDRS rules do apply to any parcel in Auckland that does not have a qualifying matter (approximately 27,000 parcels). For most parcels, the “Auckland Unitary Plan Operative in part” (AUPOP) currently applies, however developers/planners have been able to argue to allow MDRS to apply to other parcels.
- s) tuhi tīpoka / note that the legislation requires Auckland Council to either proceed with PC78 or publicly notify a replacement plan change by 10 October 2025. Given that the Act only received Royal Assent on 20 August 2025, this creates an extraordinarily short time frame to develop, consider, and notify a significant change for Auckland’s key planning tool.
- s) tuhi tīpoka / note that the Kaipātiki Local Board are not the decision-makers on zoning or planning matters, and appreciate the opportunity to provide input on this important matter, requesting that our views and those of the communities we serve be considered in full as part of the Policy and Planning Committee’s decision-making process.
- s) tuhi tīpoka / note with concern the lack of time for wider public consultation prior to notification, and that many local residents will still be unaware of the discussion.
- s) tuhi tīpoka / note that the proximity to the local government elections (as required by legislation) has constrained elected members’ ability to engage with the community as required by legislation.
- s) tono / request that local boards have a further opportunity to provide feedback on the selected plan change, and the ability to feedback on specific parcels.

Supporting Withdrawing PC78

- s) tautoko / support the withdrawal of “Proposed Plan Change 78 - Intensification” that formally applies MDRS rules to all parcels, as it imposes a blanket approach to planning, with inappropriate, high-intensity zoning in areas that lack supporting infrastructure; are subject to coastal erosion; are in flood plains; contain significant ecology; and reduces special character areas.

Supporting replacement PC

- s) reluctantly support the proposed replacement plan change as included in Attachments A-F of the agenda report as, on the whole, it is better for the community and for town and infrastructure planning than the alternative PC78, noting that it:
 - xiii) does not include the MDRS rules which could allow uncontrolled intensification across the city by enabling three homes of up to three-storeys high to be built on most residential sites (without qualifying matters) without a resource consent.
 - xiii) keeps the Residential - Single House Zone, particularly around the coastal areas which are under highest risk from flooding and coastal hazards.
 - xiii) strengthens controls for managing the risk of flooding, coastal hazards, landsides and wildfires, giving council greater ability to avoid developments that may create risk.
 - xiii) downzones areas that may be impacted by coastal erosion/inundation, thereby minimising housing development in these risky coastal areas.

Feedback on replacement PC

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- s) tuku / provide the following feedback on the proposed replacement plan change:
- xiii) support the removal of MDRS rules.
 - xiii) request a greater set-back requirement for properties that border properties with a special character overlay as a way to help protect and limit impact on the special character of the area.
 - xiii) request the retention of the existing Special Character Area overlays as they appear in the AUPOP.
 - xiii) request set back rules are put in place for buildings greater than four-storey in all zones.
 - xiii) support heritage-listed buildings, objects, natural features and sites of significance to Māori all remain protected within the Kaipātiki Local Board area, this being one of the Government Listed qualifying matters.
 - xiii) request that land stability is investigated for in-land properties that are at risk of landslip other than due to coastal erosion, and that these properties are appropriately down-zoned.
 - xiii) request that the replacement plan change resolves the anomaly where town centres, such as Northcote, would have surrounding properties with a greater height allowance than the town centre itself, due to existing Height Variation Control (HVC) limits that were originally intended to enable greater density within town centres.
 - xiii) endorse properties within a Significant Ecological Area (SEA) being zoned as Residential - Single House Zone.
 - xiii) request that existing infrastructure constraints, such as water and wastewater, are suitably referenced and reflected in the replacement plan change.
 - xiii) recommend the language used to potential consent applicants for development in natural hazard zones is “DO NOT” build here, rather than “AVOID” building here.
 - xiii) request further investigation into ways to improve the Beach Haven Local Centre, focusing on transport and design quality perspective, in response to the proposed upzoning for much of the area.
 - xiii) request that conditions made under Plan Change 99 continue to apply and are not overridden by provisions in the replacement plan change.
 - xiii) request the following higher controls in the replacement plan change for all resource consents:
 - C) that consent applications neighbouring or within a flood plain are publicly notified,
 - C) that subdivision development in flood prone areas are not allowed,
 - C) that irrespective of whether the development meets the rules of the zone, that if they are proposing greater than 75% utilisation of allowed height, they must apply for a resource consent and notify their neighbours.
- s) tono / request that the public feedback timeframe is increased from 4 to 7 weeks as requested at the extraordinary Policy and Planning Committee meeting on 21 August 2025 (resolution number PEPCC/2025/123).

Reiterate previous feedback on special character areas

- l) reiterate the following feedback that was provided by the Kaipātiki Local Board at their January 2023 business meeting on plan changes 78-83, much of which is pertinent to the proposed replacement plan change:

Submission and feedback endorsements

- x) endorse and support the thorough feedback provided by the Ōrākei Local Board to plan changes 78-83, much of which also applies to the Kaipātiki Local Board area, including their concern that council has not taken a precautionary response to zone changes.
- x) endorse and support submission 2191 from Graham and Sarah Hughes, of Northcote Point. The board acknowledges the considerable detail provided in this comprehensive submission. In particular, the local board supports consideration be given to applying the 'Residential - Low Density Residential Zone' to sub-block 8.7, and that this area be given an overlay of

'Special Character Areas Overlay Residential and Business'. Sub-block 8.7 is defined as the block bordered by Queen Street, Princes Street, Duke Street and Beach Road, being the odd numbered properties on Queen Street from 55 through to 83 inclusive, and even numbered properties on Princes Street with numbers 56 through to 72 inclusive.

- x) endorse and support submission 2064 from Pest Free Kaipātiki Restoration Society. In particular, the local board supports consideration being given to reducing the amount of allowable impermeable site coverage on sites that have a Significant Ecological Area – Terrestrial (SEA-T) overlay from 60 per cent of the site to less than 50 per cent; and that the minimum amount of SEA-T coverage on a site to qualify for SEA-T protection be reduced from 30 per cent to 20 per cent in order to prevent fragmentation and cumulative loss and harm from development.
- x) endorse and support submission 1404 from Birkenhead Residents Association. The board acknowledges the consultation undertaken by the Association during the pre-consultation phase and believes their submission reflects the feedback of the wider community, specifically around the impact on Special Character Areas. In particular, the local board supports consideration being given to the following points:
 - 1. The relatively narrow extent of the SCA Overlay in Birkenhead means that: (a) many individual properties scored by council as having high character value will lose the protection of the SCA Overlay and may be replaced with non-character buildings (with limited design controls to protect the local amenity) – this will erode the area's connection to its distinctive built heritage; and (b) even in areas of Birkenhead that under PC78 would retain the SCA Overlay, these areas are surrounded by areas of only slightly lesser special character but that are proposed to lose the SCA Overlay. This means that properties that are actively detrimental to the area's special character may be built in close proximity to properties of high character value.
 - 2. Support the inclusion of infrastructure constraints relating to water and wastewater as a qualifying matter in PC78. Our particular concern in relation to water and wastewater is that Wai Manawa / Little Shoal Bay and Le Roys Bush are already badly affected by freshwater flooding and sewage overflows after heavy rainfall. Increased intensification will only make that worse, because more building site coverage means more stormwater runoff. The area does not have the stormwater infrastructure to manage that – it is a sensitive ecological area that would be badly harmed by increased silting and runoff. Auckland Council is already responding to these issues through its work on a Mini Shoreline Adaptation Plan for Wai Manawa / Little Shoal Bay. It would be counterproductive to allow increased intensification in the hydrological catchment of Wai Manawa at the same time as Council is already trying to mitigate the effects of existing stormwater runoff in the same area.
- x) tautoko / support submissions encouraging the provision of sufficient open space across the city.

Walkable Catchments

- x) we request that all walkable catchments be conditional on:
 - 1. whether adequate infrastructure can be provided.
 - 2. the retention of existing levels of public spaces, parks, and reserves, and the provision of additional public spaces, parks and reserves commensurate with the expected increase in population.
 - 3. the adoption of a 'sunlight admission control' which protects sunlight and daylight in public spaces including parks, reserves, lakes, foreshore, and beaches, and

- height controls to ensure the same are not dominated by the surrounding built environment.
- 4. including pedestrian infrastructure, such as seating and mature trees.
- 5. including minimum parking spaces and appropriate spread of disabled parking and loading zones.
- x) we do not support walkable catchments where they will adversely affect Special Character areas.
- x) we do not support walkable catchments being applied to ferry terminals. The Kaipātiki Local Board area has three ferry terminals within its catchment: Northcote Point, Birkenhead Point and Beach Haven. The majority of land surrounding the ferry terminals currently has an overlay of, special character, coastal instability, or protected tree schedules. The three ferry terminals within the Kaipātiki area all have historical significance. Both Northcote and Birkenhead ferry terminals have historical walks that encompass the wharf area and the surrounding streets. Northcote Point Ferry Terminal do not provide all weather service. The ferry is often unable to provide a service, and so it is therefore disingenuous to provide intensive housing based on transport connectivity.

Special Character Areas

- x) tautoko / support Special Character Areas (SCAs), both residential and business as a qualifying matter.
- x) we request the retention of the existing Special Character Areas and boundaries, as identified in the Auckland Unitary Plan Chapter D18 Special Character Areas Overlay (including Birkenhead Point and Northcote Point). Our particular concern is that the change creates a bias towards further erosion of the SCA Overlay, by:
 - 1. undermining the SCA Overlay, even in areas where PC78 currently leaves it intact; and
 - 2. authorising the destruction of properties of high character value, where PC78 removes the SCA Overlay.

Those two impacts would be a great loss to the city, but with only a minimal effect on overall housing capacity. We seek an amendment to PC78 that modifies the application of Council's scoring system for identifying where to retain the SCA Overlay. Our proposal is that a 50 per cent threshold (still a majority of character-supporting buildings) should be sufficient, with properties scoring 4, 5 or 6 counting towards this percentage. Council's own materials refer to properties scoring 4 as "character-supporting" – such properties should count towards inclusion in the SCA Overlay, not towards removal. This approach would result in materially greater coverage of Birkenhead as a Special Character Area, which we believe is an accurate reflection of the area's distinctive character value and heritage.

Other feedback

- s) tūtohu / recommend that the Urban Design panel is strengthened to provide confidence to our communities that we are ensuring building designs achieve quality design features.
- s) tūtohu / recommend creating an Architecture Design Review panel to ensure architecture design and quality in new developments and that they do not detract from the surrounding areas.
- s) tono / request the Auckland Council Flood Viewer tool is used to determine the flood plain so the public can make decisions about where to purchase and build homes.
<https://experience.arcgis.com/experience/cbde7f2134404f4d90adce5396a0a630>
- s) āhukahuka / acknowledge the work and advocacy the Policy and Planning Committee have achieved since January 2023 for this work to legislatively prevent building homes in flood-prone and erosion-prone areas.
- s) tuhi tīpoka / note that parking is already a serious concern of many local residents, with an increasing number of vehicles left on the street. We note that the previous Government removed

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the parking minimums and the current Government has made no move to return them, leaving council with limited powers to influence the provision of car parking.

- s) tono / request that the government return the ability of Councils to require off-street parking to reduce a congestion on the roads and allow people to be able to charge electric vehicles.
- s) tono / request that references to Integrated Residential Development (IRD) are removed or changed to “Prohibited” for the Residential – Single House Zone, due to the incompatibility of such developments from the intention of the zone.

Māngere-Ōtāhuhu Local Board

Resolution number MO/2025/139

That the Māngere-Ōtāhuhu Local Board:

- a) tuku / provides its views on:
 - i) the withdrawal in part of Proposed Plan Change (PC) 78 - Intensification
 - ii) the draft replacement plan change documents below:
 - Chapters A, B, C, D, E, G and H
 - Chapter I
 - Chapters J, K, L, M and Māngere-Ōtāhuhu Map Series.
- b) tuku / provides the following input to the Auckland Unitary Plan – Plan Change 78:
 - i) General
 1. The local board acknowledges PC78 can increase housing stock, support affordability, and encourage growth near town centres and transport hubs. However, zoning alone won't ensure affordability; targeted infrastructure upgrades and government-backed affordable housing are needed.
 2. Additional support required - without complementary measures, such as, rent controls, shared ownership schemes, or government-backed affordable housing intensification risks pricing out existing residents rather than providing genuine local housing solutions.
 3. Qualifying matters - to minimise extreme natural implications - flood risks, environment sensitivities, protect heritage and cultural elements are vital to ensure growth is balanced, community safety, and preserving important assets i.e. open spaces, and ensuring community wellbeing. Readers are referred to the local board's previous resolutions (MO/2022/166, MO/2022/92, MO/2022/93) for guidance on consistent application of qualifying matters.
 4. Community engagement - is essential and is a priority, to get it right! Especially where flooding overlays affect existing properties, neighbouring properties, and planned development to ensure PC78 apply local knowledge, uphold cultural values, and community priorities while guiding planned intensification and protecting our environment.
 - ii) Engagement
 1. Local network - note the critical importance of community, iwi, and stakeholder engagement in informing the local board's feedback on PC78. The local board calls for effective engagement ensures that local knowledge, lived experiences, and cultural considerations shape how intensification is implemented in Māngere-Ōtāhuhu.
 2. Local board support - that PC78 is being considered at pace, with limited community input. The complexity of the information and maps, even with subject matter experts available, makes it challenging for the board to fully understand implications. This quick approach risks decisions being made without meaningful local insights, particularly given the potential impact on local neighbourhoods.
 3. Property value - acknowledge that engagement is particularly important for sensitive areas, such as flood-prone zones, where the board wants to support risk mitigation

measures while balancing the rights and development potential of property owners. Limiting development in these areas under PC78 may reduce flood risk but could also constrain housing supply or affect neighbouring properties i.e. property value, creating potential tensions, that require careful management.

4. Flood response - request that government and Council provide clear information on how flood management, PC78 provisions, and neighbouring property impacts will be addressed, including potential mitigation measures such as design controls, infrastructure upgrades, or compensatory planning measures.
 5. Cultural engagement - Māngere-Ōtāhuhu is one of Auckland's most ethnically diverse communities, with many residents for whom English is a second language. Engagement on PC78 has been rushed and complex. To build trust and ensure fair outcomes, Council must invest in genuine engagement through local providers, in community languages, and in formats that are accessible to residents with limited resources or digital access.
 6. Local accountability - urge that engagement outcomes must be presented to the local board before final feedback is adopted, ensuring that the board's decisions reflect the community's priorities, protect sensitive areas, and allow sustainable intensification while minimising unintended consequences.
- iii) Town Centres
1. Note that targeted intensification around Māngere Town Centre, Ōtāhuhu Town Centre, Māngere East, and Māngere Bridge villages is expected to support local businesses, retail growth, employment opportunities, and mixed-use development.
 2. Request that Council ensures infrastructure, public amenities, and community facilities are upgraded and coordinated with growth, so higher population densities do not compromise wellbeing or local streetscapes.
 3. Acknowledge that intensification can improve access to public services, transport, and housing choice, but caution that areas with historically lower access to open space and amenities may experience strain without additional investment.
- iv) Transport Hubs
1. Support walkable catchments - around Ōtāhuhu and Middlemore train stations, and the Māngere Town Centre bus interchange, are intended to encourage public transport use, reduce car dependency, and support the economic viability of rapid transit infrastructure.
 2. Request forecasting information from Auckland Transport to its assessment of potential congestion, parking pressure, and safety risks, and implements mitigation measures such as enhanced feeder services, safer pedestrian/cyclist connections, and park-and-ride options.
 3. Recognise that if intensification is dispersed too widely under this proposal, to isolated areas (where land is available) public transport patronage may be lower than projected, reducing the benefits of significant public investment, such as the City Rail Link and future Light Rail lines.
 4. Ōtāhuhu train station - allowing development up to 50 metres / 15 storey's in the Ōtāhuhu walkable catchment would go beyond the modest intensification expected, overshadowing the town centre and conflicting with nearby heritage areas:
 - A) Noting, misalignment with previously modest intensification and would be detrimental to supporting a sense of community through built environment. This portion of the suburb would be, oddly, higher than the town centre. The local board

believe it is out of line with proposals for Papatoetoe and Middlemore train stations, with such heights being more appropriate for Papatoetoe.

- B) Compounding this matter, parking, traffic, trucks, and industrial and commercial business activities are already cheek by jowl with schools and ECEs, for example. Putting more families and children into this area could be quite unsafe. The proposed change, under which very high buildings might be placed in this area, is also widely out of character while just a street or two away from a heritage overlay area, which would potentially be overshadowed by large apartment blocks.
- C) Ōtāhuhu is already driven by a railway line and State Highway, has light industrial and commercial patches at various points, including part of the walkable catchment, which already make enjoyment of life as a coherent community difficult. The board further expresses concern that such large-scale towers, alongside existing challenges such as the railway line, State Highway, and light industrial activity near schools and early childhood centres, could increase risks and weaken community character.
- D) Note, more modest heights of dwellings might not produce quite the population of the larger developments, but would achieve the benefits of intensification, increased use of public transport, less use of cars is envisaged by this approach while still keeping with the wellbeing of the community.
- E) While acknowledging that higher densities may be more appropriate in places such as Middlemore, where the hospital and transport hub naturally support more intense development, the local board supports a balanced approach to intensification in Ōtāhuhu, preferring lower building heights that better reflect the local environment and community needs.

v) Affordability and Economic Opportunities

1. Note that the policy aims to attract investment and stimulate economic activity in Māngere-Ōtāhuhu during financially challenging periods for residents.
2. Unaffordable - highlighting the local board's adopted position to central government's National Direction package 4 - Going for Housing Growth Pillar 1: 'freeing up land for urban development and removing unnecessary planning barriers. And, calling government for improved affordability in home ownership by addressing the fiscal gaps our community faces in securing local housing, such as low household budgets, through low wages, high unemployment, high interest rates and cost of goods and services.
3. Fiscal support needed - while PC78 allows more intensive housing, zoning alone will not make homes affordable for our community. Māngere-Ōtāhuhu has a high proportion of low-income households already struggling with housing costs. Without complementary measures such as government-backed affordable housing, rent controls, or shared ownership schemes and intensification risks pricing out existing residents rather than providing genuine local housing solutions:
 - A) request complementary fiscal and regulatory measures to support affordable housing delivery, rental stability, and mixed housing types, so growth benefits are accessible to households below the Auckland average income
 - B) request council and central government develop and implement targeted local initiatives and incentives that ensure employment and retail opportunities from intensification benefit all residents, particularly financially vulnerable households,

preventing exclusion from local economic growth. Noting Qualifying Matters paragraph 10. in this feedback.

vi) Qualifying Matters

1. Note that applying these qualifying matters may limit some property owners' ability to fully utilise PC78 development rights, such as building to three storeys or higher. This creates tension between enabling housing supply and managing risks. Engagement is therefore critical to test whether communities understand, accept, or oppose these trade-offs particularly in flood-prone areas, like, Māngere East, Māngere, Māngere Bridge, and Ōtāhuhu coastal areas, where restrictions may apply unevenly across neighbouring sites.
2. Request that PC78 must continue to recognise and protect Qualifying Matters, which are essential to maintain the unique environmental, cultural, and historical character of Māngere-Ōtāhuhu. The board emphasises that these areas require careful planning controls to balance intensification with protection of sensitive sites.
3. Heritage and Special Character Areas - protect areas with significant heritage or architectural value, including Rosella Road, Tioro Lane, Teo Lane, Middlemore, and the Ōtāhuhu Train Station neighbouring residential precincts. Development in these areas must be carefully managed to retain historical character, maintain streetscape integrity, and prevent overshadowing or overdevelopment.
4. Volcanic Height-Sensitive Areas & Outstanding Natural Features - safeguard volcanic view shafts and outstanding natural features, including Māngere Mountain, Mount Richmond, Ōtāhuhu, Kuranui Place, Māngere Road, and Ihumātao Quarry Road. Ensure that new development respects height-sensitive limits, protects sightlines, and maintains public access to culturally significant landscapes.
5. Infrastructure Constraints - acknowledge limitations in stormwater and transport networks around our local board area due population growth and dated pipes and drains, and transport networks i.e. road corridors. Growth in these areas should be matched with infrastructure upgrades and design solutions that mitigate flooding, congestion, and safety risks for residents.
6. Aircraft Noise Areas - retain Single House zoning and restrict sensitive development in areas affected by high cumulative aircraft noise, such as Jaylo Place and Shah Place. Development must comply with the Aircraft Noise Overlay and prevent adverse health or amenity impacts for residents.
7. Walkable Catchments - maintain walkable catchments as a qualifying matter to ensure new development occurs within 1,200 m of city centres, 800 m of metropolitan centres, and 800 m around rapid transit stops. These catchments support sustainable transport, accessibility, and community integration, preventing dispersed, ad hoc development.
8. Education facilities – support schools and colleges being recognised as a qualifying matter, noting their role as vital community infrastructure. Multi-storey developments beside schools can create safety, access, shading and compounding traffic issues. Protection is needed to ensure intensification supports, not undermines, children's learning and wellbeing. For example, feedback from local students highlights real concerns about oversurveillance and privacy, such as high-rises overlooking schools. PC78 must include stronger protections around sensitive sites: schools, parks, and cultural landmark so intensification does not compromise safety, privacy, or mana of local spaces.

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9. Light Rail Corridor - provide clarity on the proposed Light Rail corridor in Māngere, including stop locations, zoning implications, and potential intensification impacts. Ensure that development along this corridor aligns with future transport infrastructure, supports public transport uptake, and does not adversely affect neighbouring communities.
 10. Environmental and Cultural Considerations - protect areas of ecological, environmental, and cultural significance, including waterways, wetlands, and green spaces, ensuring that intensification does not compromise biodiversity, flood management, or cultural heritage.
- vii) Housing Stock and Land
1. Integration - request that government through Kāinga Ora (KO), Auckland Council through Eke Panuku, and private developers coordinate to deliver housing that meets demand, provides social and affordable options, and complements local infrastructure such as schools, parks, and stormwater networks.
 2. The local board request that central government complete its planned local social housing builds as a priority to ensure low-income families and individuals are provided with affordable and much need housing.
 3. Note that dispersed development under the blanket proposed intensification including the Medium Density Residential Standards approach may increase infrastructure costs, reduce efficiency, and challenge the intended outcomes of a compact city.
- viii) Infrastructure and Community Safety
1. Our area already experiences pressure on infrastructure (stormwater, transport corridors, schools, health services). Intensification under PC78 will exacerbate these strains unless upgrades are prioritised. We urge Council and central government to coordinate investment in infrastructure, green spaces, and community amenities to ensure intensification supports wellbeing rather than undermining it.
- c) tāpae / delegate authority to the Chairperson to make minor changes to this input.

Manurewa Local Board

Resolution number MR/2025/127

That the Manurewa Local Board:

- a) tuku / provides its views on the withdrawal in part of Proposed Plan Change 78 - Intensification and draft replacement plan change:
 - i) The Manurewa Local Board is pleased that the special character area in Hillpark will remain as it is in the proposed changes. However, the board are not supportive of other areas of the proposal
 - ii) While there is a need for housing and accommodation close to main transit lines, the introduction of 16 storey apartments along with the upgrade in the zoning changing to urban zoning, creates significant pressures on antiquated infrastructure along with the pressure on public play spaces and local schools. Our ageing infrastructure is not equipped to handle the amount of intensification that is proposed
 - iii) The proposed changes will increase intensification across areas of high deprivation through Manurewa Central, Clendon Park, and Weymouth, and put a strain on communities like Wattle Downs, which traditionally have only been medium land lot sizes. We are growing too quickly and our existing infrastructure is not equipped to deal with the amount of intensive development that will come with the zoning changes
 - iv) School rolls will increase but the school footprint will not. This is a direct byproduct of increasing intensification, and we are not aware of any intentions to be building more schools in Manurewa. We do not want to see local schools needing to build prefab classrooms on their fields and play areas to accommodate the increasing number of students. There needs to be a discussion between the Ministry of Housing and the Ministry of Education to ensure that our schools can manage the growth and provide the best education possible while also maintaining areas for the children to play
 - v) Communities will increase in population, but the funding for more parks, playgrounds and better play infrastructure will be little, if at all
 - vi) Manurewa contains no greenfields with which to expand, and as an area, we are almost completely developed so we are unable to grow outwards. That means we must grow upwards. Increasing intensification won't be hard in Manurewa because land is cheap, but we are not attracting any significant developer contributions. We have had a significant increase in social housing, and almost zero investment in our playgrounds and sports fields from these contributions
 - vii) Council tells us that we are already growing faster than our sports fields can manage so the lack of planning or visibility around planned funding does not allow us to adapt to future growth
 - viii) Zoning changes do not initially come with any plans. They allow the same guidelines to rollout across the same zones and unless there is a plan for increasing our stormwater and wastewater infrastructure, we are recommending that urban areas stay as suburban zoning. We request that if the plan change proceeds, that there is updated hazard mapping and investment in stormwater infrastructure, especially post-2023 Auckland Anniversary floods
 - ix) We are concerned with the effect this plan change will have on our community and that areas of high deprivation will suffer.

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Maungakiekie-Tāmaki Local Board

Resolution number MT/2025/133

That the Maungakiekie-Tāmaki Local Board:

- a) tautoko / support the principle of intensification and transport-oriented development, particularly around CRL stations, provided it is aligned with infrastructure delivery, urban design, and community wellbeing outcomes.
- b) ātete / oppose blanket requirements for 15-storey buildings in established residential neighbourhoods and recommend a more balanced approach of 6–8 storeys in such areas, noting risks of loss of amenity, character, green space, and pressure on existing infrastructure.
- c) tautoko / support further intensification and mixed-use development in principle, but not prescriptive government directions that:
 - i) mandate building heights or catchment sizes without local discretion;
 - ii) require offsetting for qualifying matters;
 - iii) undermine existing locally enabled capacity.
- d) tūtohu / recommend that the replacement plan change retain strong local decision-making to identify appropriate corridors, intensification areas, and to uphold qualifying matters without offsetting.
- e) tautoko / support integration of the replacement plan change with regional spatial plans and transport strategies, including sequencing and coordinated land release, and identification of 'no development' zones such as natural hazard or high ecological value areas.
- f) tūtohu / recommend that intensification under the replacement plan change focus on medium-density housing in suburban areas, particularly:
 - i) areas adjacent to frequent public transport corridors
 - ii) local and town centres
 - iii) underdeveloped areas within the existing urban core
- g) tautoko / support housing growth targets under the replacement plan change in principle but oppose reliance on high-growth projections as the default basis and recommend use of mid-range projections with infrastructure capacity as a key input to defining feasible and realistic development capacity.
- h) acknowledge inclusion of light rail corridors through Onehunga for intensification noting changes for properties under special character provisions
- i) tautoko/support full public notification of the replacement plan change to enable community input into the process.

Ōrākei Local Board

Resolution number OR/2025/115

That the Ōrākei Local Board:

- a) provides the tabled views on:
 - i) the withdrawal in part of Proposed Plan Change 78 - Intensification
 - ii) the draft replacement plan change documents below:
 - Chapters A, B, C, D, E, G and H
 - Chapter I
 - Chapters J, K, L, M and Ōrākei Map Series.
- b) reserve the right to speak to the tabled feedback at an upcoming Policy and Planning Committee meeting.

Ōrākei Local Board feedback on withdrawal of proposed Plan Change 78 intensification and the replacement plan change settings

“Well-designed urban environments, with efficient transport systems, integrated with housing and functional infrastructure, is the key to creating a place where people want to live.”

- Quote from Hon. Chris Bishop’s speech on National Urbanist’s Plan, February 2025

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1. Withdrawal in part of Proposed Plan Change 78 - intensification

Contextual challenge:

Central government has forced an intensification change to meet an excessive 2m capacity target that must proceed in October, an inadequate time frame relative to the scale of change and impact on Aucklanders' future:

- Either PC 78 continues to reflect the mandated policy 3 (and policy 4) NPS-UD with MDRS **OR**
- The replacement plan change (RPC) proceeds without MDRS but more targeted intensification - a requirement under the Resource Management (Consenting and Other System Changes) Amendment Act 2025 (centres, corridors, and walkable catchments), along with improved responses to natural hazards.

Introductory comment: best process

Infrastructure-led development delivers superior outcomes to capacity-led development. Objective six of the NPS-UD requires infrastructure alignment to support any densification mandated under Objective 3.

Council advisors have confirmed there has been no alignment with the replacement plan proposal or even with the original PC78 and have confirmed by proceeding under the current central government rushed process, the local board are being forced to perpetuate urban design outcomes and enable a 2m capacity that will create greater economic burdens than benefits for Auckland and have significant environmental effects.

Auckland Council cannot achieve the 2m capacity without government funding an infrastructure approach.

- For example, when CRL opens, we understand a further \$6.7bn will be needed to upgrade signalling and road separation alone. To create a true loop requires the Avondale to Southdown link to be constructed (we understand conservatively another \$6bn) to have the sort of corridor and network infrastructure under-pinning the excessive capacity mandated; and this is before investing in the majority of Auckland water and wastewater infrastructure.
- There is a significant need for integrating transport and land use planning before enabling extra capacity. The GPS 2024 proposes to increase revenue by 34% over 2024-2026 compared to the previous cycle of 2021-2023. This suggests expenditure will increase from \$15.5 billion to \$20.8 billion, with the goal of enabling better maintenance of roads and services. The intensification of Auckland requires a commitment to an integrated transport plan with multi-modal planning first, and then the housing capacity re-assessment.

Ōrākei strongly recommends the best and more appropriate process for achieving the equivalent of this withdrawal would be for Central government to use its powers to amend RMA laws so to enable Auckland Council to conduct more considered, location savvy and infrastructure-aligned planning through a full unitary plan review.

Ōrākei notes no one is prejudiced by that approach as the current AUP operative in part enables capacity for developers to build density development and home seekers ample opportunity to live in areas proximate to transport routes.

Systemic pros of a partial withdrawal

- Stronger hazard protections and deterring higher density from flood-prone areas.
- Higher density near transport hubs as opposed to in a blanket way across all residential zones.

- Some potential for down-zoning is recognised with sustained qualifying matters, recognising character areas, and ensuring greater housing choice for all ranges of people, including limiting development in some desirable areas.
- Provision for public notice and public submissions
- Withdrawal allows most SCAs, viewshafts and historic buildings to remain as qualifying matters.

Systemic cons of a partial withdrawal

- Unnecessary complexity and uncertainty for landowners and residents generated by reconciling part plans
- More site-by-site assessment given a range of nuanced rules and standards leading to cumulatively fragmented urban landscapes.

2. Upzoning, downzoning and off-setting

The proposed replacement plan contains several zone changes by area that will lead to poor planning outcomes, but these and others can be improved. Some of these are detailed below under the heading **'Specific locational changes needed'**.

Due to time pressures, we have not been able to examine every corner of our ward area on the maps and documents as much as we would have liked. For every downzoning change requested, we refer to other areas or ways of upzoning to absorb any lost capacity.

We do not agree that we or the Governing Body should dismiss the operative AUP zonings and rules from consideration. Those settings had the benefit of extensive professional input providing the foundation for zoning lay outs that PC78 and the proposed plan change now seek to modify.

Ōrākei rejects the blanket imposing of MHU across previously MHS area and prefers all MHS to be reinstated.

Ōrākei notes it is also critical for some areas of traditional inner city high value land areas to remain downzoned to attract high net worth executive investment. Most global cities have blue chip areas that attract executive investment which in turn helps generate economic growth. It is a positive planning outcome to ensure some generous catchments of MHS remain within known high land value areas of the inner city. Larger house lots also contribute permeable surfaces for stormwater absorption.

Ōrākei supports retention of all overlays protecting heritage, ecological values, special character, volcanic viewshafts and other qualifying matters such as infrastructure readiness and hazard constraints.

Ōrākei questions advice there is less enabled capacity across most of Ōrākei under the RPC than under PC78 (which incorporates MDRS). It seems inconceivable that changing existing MHS to MHU results in less enabled capacity.

Example of principles applied when proposing adjustments to the proposed plan:

- Increase intensification along more main road networks around the Ōrākei Ward (see Figure 1 below), pushing them up to a longer, narrower Terrace Housing and Apartment Zone, in exchange reducing some of the MHU in parts of our suburbs back to MHS.
- Increase intensification where able closer to Tāmaki Drive, as this has a good transport link into the city.

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- Push MHS back into areas where stormwater catchments are already at full capacity and where there is no rapid transport links.
- Areas with narrow streets unable to take two freely passing cars and road parking both sides of a street should be identified as unsuitable for MHU.
- Flat land areas are better for apartment zoning, and apartments deliver true, more affordable, density from dwellings per site. *“Townhouses, when pushed into leafy suburbs do not deliver meaningful density or character, they erode garden streets without solving housing supply at scale” – local developer*



Figure 1

For example, to off-set proposed down-zoning of areas outline above and in the rest of this submission ,(including Remuera walkable catchment from 15 down to 6 story, reduce Remuera Town centre THAB from 400m to 200m, down-zoning of larger tracts of proposed MHU back to MHS across some of our suburbs), the arterial routes marked in black could be added to up-zoning for Ōrākei. This would deliver a more coherent suburban environment away from the arterials, and a more coherent high-density environment along more arterials.

Any downzoned capacity from adjustments proposed in this feedback could be made up by, including but not limited to, implementing the below:

- Extended, narrower lower height THAB zoning along arterials in black, in Figure 1 above, and/or

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- Around Morrin and College Rd and up into the entire Swainston / Strong / Felton catchment areas that are all close to Glen Innes station and sporting facilities, and/or
- Around the south side of Greenlane train station and around Ascot hospital area, and/or
- Enabling 5 story THAB in some areas close to Tāmaki Drive (which appear to have been re-zoned as SHZ when most sites already have at least MHU or THAB intensity on them), only where developers are able to manage stormwaters and flood risks onsite to a standard that can cope with tropical downpour levels of water, without needing to be connected to public systems – for example around Speight and Melanesia Road in Kohimarama, and around Tagalad and Atking Ave in Mission Bay – all close to very good public bus services, and/or
- Enabling some THAB around Ngahue Drive, southern Norman Lesser Drive and Panapa Drive internal catchment, and/or
- Activating the “Selwyn” train station between Meadowbank and Glen Innes, with enabled walkable catchment to that (see below)



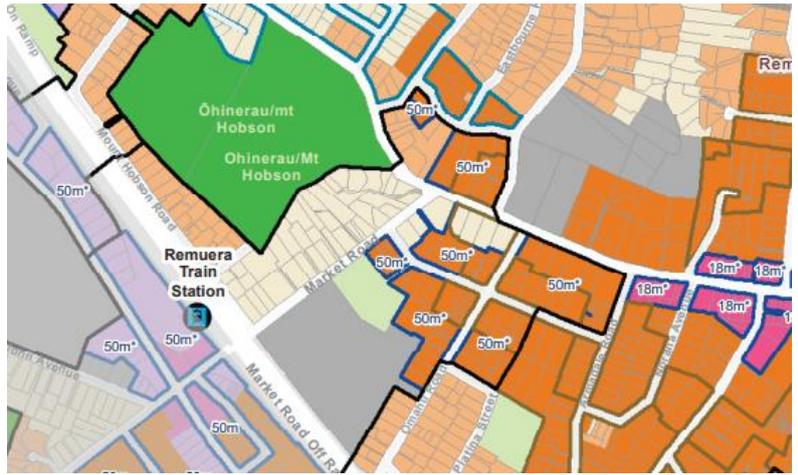
3. Specific locational changes needed

Ōrākei rejects the blanket imposing of MHU across previously MHS area and prefers all MHS to be reinstated.

a) Remuera Walkable Catchment

Ōrākei rejects a 15-story walkable catchment setting for Remuera walkable catchment areas around Mount Hobson and rejects the accuracy of the 800m catchment boundary encroaching across the north side of Remuera Road.

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Hobson landscape integrity / recreational amenity values will all be adversely affected by any sporadic fifteen story development in this prominent location outside volcanic viewshaft controls. The lower 5-6 story level of THAB height is recommended.

An 800m walk is closer to the south side of the Remuera and Market Rd intersection.

By ending the catchment on the south side, there is a better residential design coherence for that area of the arterial abutted by a mix of SCA, single house zones and very highly renovated character homes, thereby creating a genuine neighbourhood precinct.

It would be inappropriate to that coherence, proximate to natural volcanic landscape, to enable 50m + towers on the north side of that area of Remuera Rd.

b) Remuera town Centre THAB - reduce from 400m to 200m.

Ōrākei rejects a 400m THAB extension from the Remuera town centre down Victoria Avenue and says 200m is more appropriate on the northern side.

Ōrākei also rejects the imposing of THAB for Garden Place on its west side, and north side running to Te Kowhai Ave.

These are small areas where lower density estates meet a demand and provide a choice for the very high end of the market, which is fair.

Extending THAB down past Te Kowhai Ave results in incoherence with proximate retained SCA and SHZ starting from Tirohanga Ave on the east side of Victoria Ave.



It is a poor urban planning outcome to have six story THAB height density directly beside SHZ with SCA overlay (SCA overlay not shown above).

It is a poor planning outcome to enable high density on both sides of Te Kowhai Avenue which is a very narrow Cul de sac already unable to manage transport and parking effects.

These properties should be rezoned Residential Single House to protect amenity and public health and safety, in the absence of infrastructure capacity. The properties also drain on to a flood plain and are unsuitable for higher density.

Ōrākei rejects the removal of Special Character Area and loss of Single House zoning across all ROW properties on the Eastern side of Seaview Road, excluding 117 and 119 at the northern end and calls for those to be reinserted.

It is also inaccurate to interpret special character areas as if only a visual streetscape is relevant. Case law on assessing special character includes criteria regarding vegetated spaces and unbuilt sight lines through properties, into areas behind or below, which benefit pedestrian and visitors sense of place as much as local owners.

The new plan shows the removal of Special Character for ROW properties and the loss of Single House zoning in the northern end of the street. The densification of these sites will undermine the integrity and amenity values of the special character of adjoining properties and the street in general.

e) Hanene Street vicinity and around Vellonoweth Green

Determine what the blue shading for the bottom of Long Drive in St. Heliers where it intersects with Hanene Street and extends up Hanene Street (see red circle).

The colour suggests it could be a 'Coastal Defence Zone'. It may be an overland flow path. Either way, it seems an odd feature for Hanene Street at the bottom of Long Drive.



Large parts of Kohi and The Parade in St. Heliers are designated 'Residential Single House Zone.'

This ignores the fact that the areas illustrated are already multi-story/multi-residences.

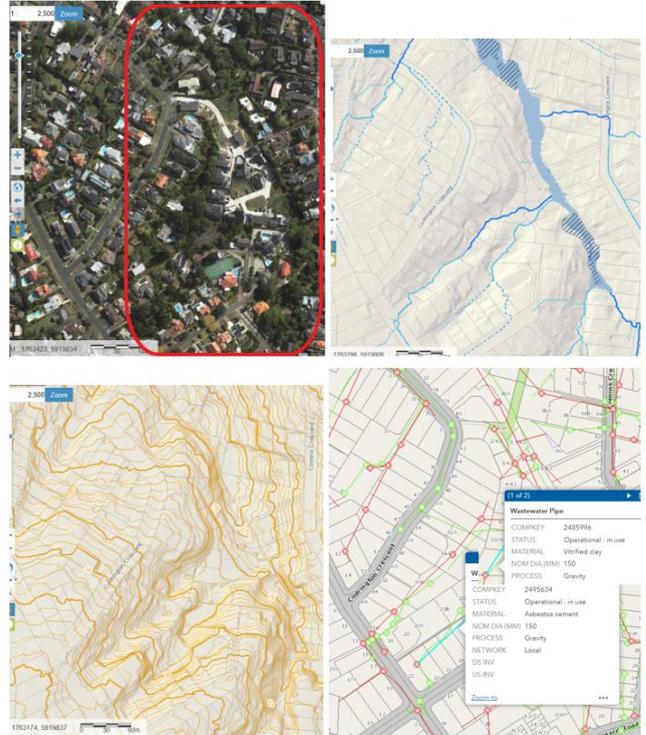
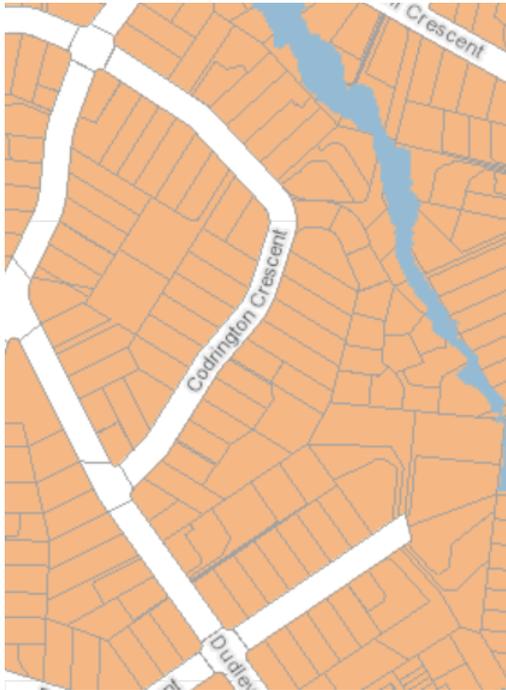
Ōrākei rejects the proposed plan accurately accommodates impermeable surface areas in a meaningful way in the Vellonoweth catchment.

Upzoning the immediate surrounding hill areas of Vellonoweth Green will result in little remaining permeable surface and accelerate water runoff, worsening flood risks to that flood plain area.

- f) Palmer. Codrington, Dudley sloped precinct** – all the SHZ zone currently in this precinct should be reinstated for this catchment as most sites sit on steep sloped land with numerous overland flow paths (see figure below).

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Density and impermeable surface effects greater than SHZ on these sites exacerbate flood plain effects lower down. Watercare GIS for this area (see figure below) shows pipe infrastructure of 1940 heritage, mixed clay pie and cement with no imminent upgrade. Any off-set density can be recouped as described in a) above.

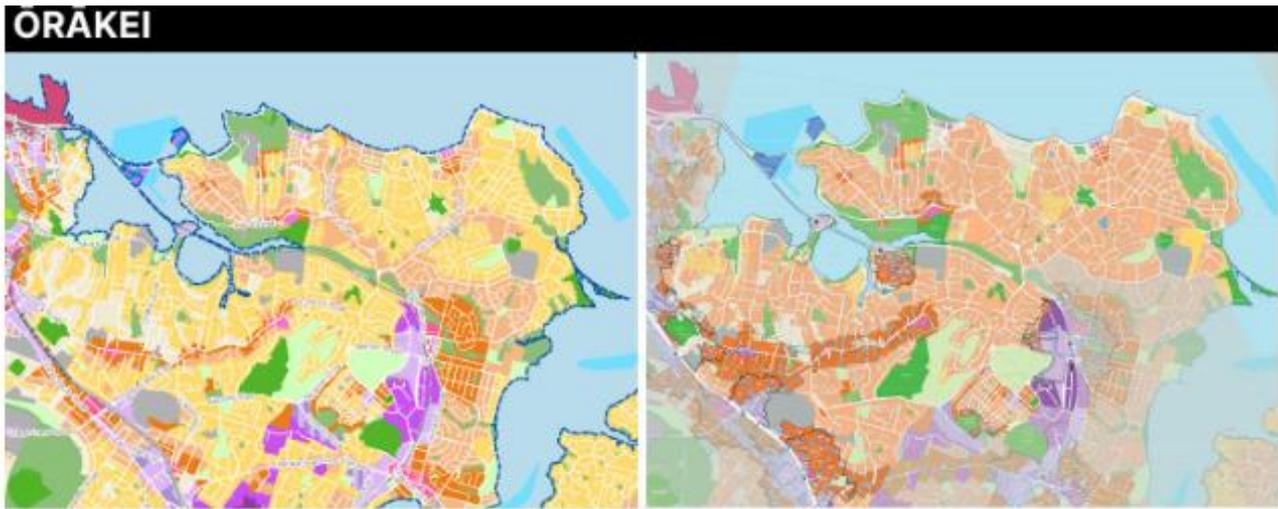


g) Further re-balancing of MHS and MHU across Ōrākei - Victoria Ave, Arney Road, Rangitoto Ave East, Dingle Dell & Fern Glen Road, Cliff Road, Selwyn Road, Allum St valley from Pamela Place, Remuera Road East between Pukeora and Waitarua, Upland Road to Benson Road, Ōrākei Basin north of Upland, Paratai Drive and Tuhaere, Amy St to Michaels Ave Reserve, Meadowbank Road, and Temple Street

Ōrākei rejects the blanket imposing of MHU across previously MHS area and prefers all MHS to be reinstated.

Ōrākei acknowledges some new MHU with adjusted standards is a more likely to deliver a better outcome than blanket MDRS regionally.

Ōrākei recommends greater housing choice and better integrated planning by not having the extent of blanket application of new MHU across all areas of Ōrākei as proposed (see map comparison below).



Ōrākei recommends re-inserting areas of MHS (and some SHZ) across our Ōrākei suburbs in strategic locations – which can be achieved without losing capacity when coupled with off-setting ideas to upzone.

The following neighbourhoods are also **recommended** for reverting from proposed MHU back to MHS or other setting:

Along Victoria Avenue - frontage sections either side, from Tirohanga and Te Kowhai Avenues north, in vicinity of existing SCA pockets, and reconnecting to MHS at the northern end - to sustain a coherent sense of established built-form, character and suburban neighbourhood housing choice.



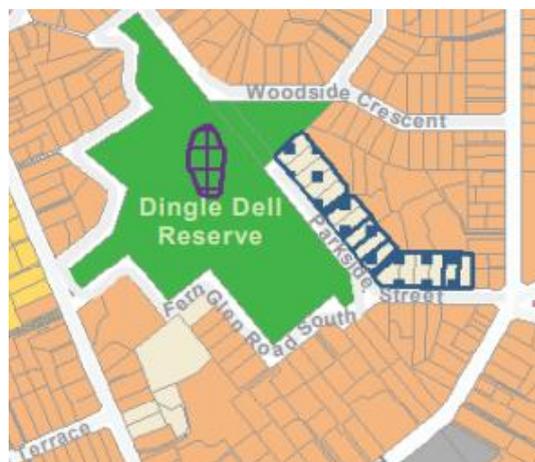
Arney Road - street front sections either side from the existing SCA through to Shore Rd to sustain a coherent sense of established built-form, character, and suburban neighbourhood housing choice.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

Rangitoto Avenue East – re-inserting a small area of at least MHS as indicated below, ideally SHZ to provide a more coherent transition from Rangitoto West SHZ and SCA (not shown on extract below), and into MHU. Extending a small area of SHZ appears a better outcome here given the indicated sites are also in a flood plain unsuited for greater density housing.



Dingle Dell and Fern Glen Rd – noting flooding issues in the lower Dingle Dell catchment, it is inappropriate to blanket MHU around this reserve. Re-insert a small area of at SHZ and MHS around the entire reserve, enabling coherence with existing SHZ, some SCA and enhancing the amenity of the reserve’s passive recreation and ecological values.



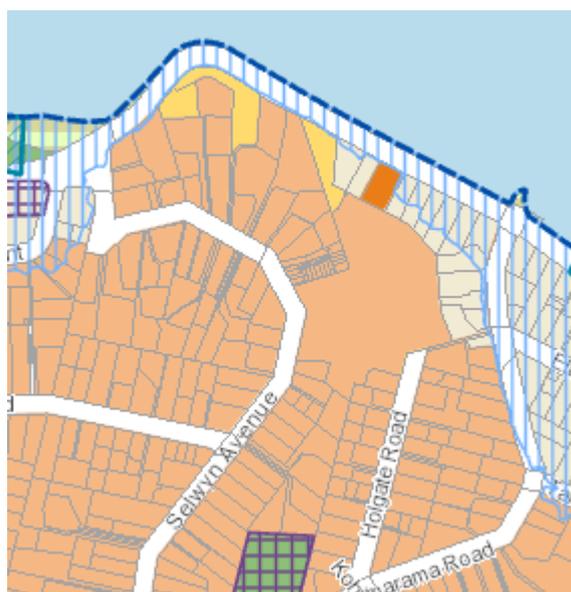
E mahi ana mātou i te mahi mō Tāmaki Makaurau

Cliff Road – noting coastal margin erosion overlay and stability risks, there should be consistent SHZ inserted along the western side between the four current depicted SHZ sites.



Selwyn Ave – the proposed upzone removes THAB and inserts SHZ in all but one Tamaki Drive property below Selwyn Ave but retains a few sporadic MHS.

This northern corner of Selwyn Ave adjacent to the single THAB site and west to the junction of Selwyn and Tāmaki should revert to MHS delivering more coherent outcomes in a prominent cliff side coastal location.

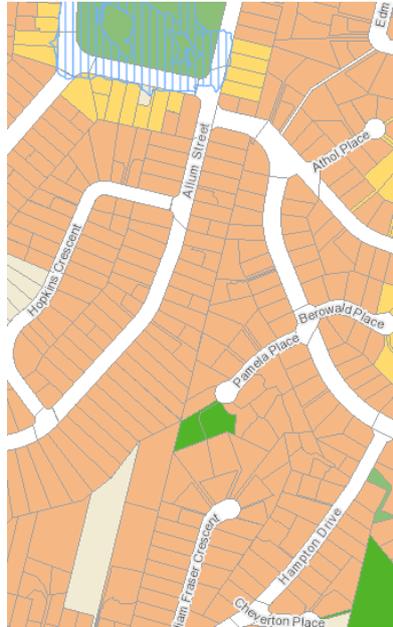


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Allum Street east valley from Pamela Place

This area has strategic significance as a reserve acquisition running from Pamela Place down the valley to the north intersection with Grampian and Baddeley, going some way to assuring sustainable ecological values for the region.

The sites around Allum and Pamela should have a 'proposed recreational reserve' overlay and have underlying zoning re-instated as MHS.



Remuera Rd East between Pukeora and Waitarua

The reintroduction of SCA is supported. However, it is a poor design outcome to enable THAB on the north side of that SHZ with SCA overlay. The THAB in this vicinity should be narrowed, so not to exist on the immediate north side of any such SHZ / SCA property.



Upland Road to Benson Road

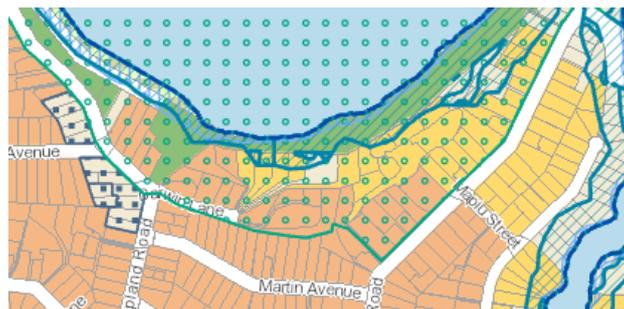
This area has already demonstrated successful upzoning development from MHS settings. MHS should be reinstated along both sides of this road from Benson Rd village, proximate Little Rangitoto Park and connecting to the retained SCA on SHA near Ventnor

E mahi ana mātou i te mahi mō Tāmaki Makaurau



Ōrākei Basin – north side surrounds

Noting pockets of retained SHZ / SCA and MHS, greater urban design coherence suited in this volcanic basin area is achieved if all the northern sides of Upland, Dilworth Lane, and Lucerne are consistently MHS.



Paratai Dr and Tuhaere Street precinct

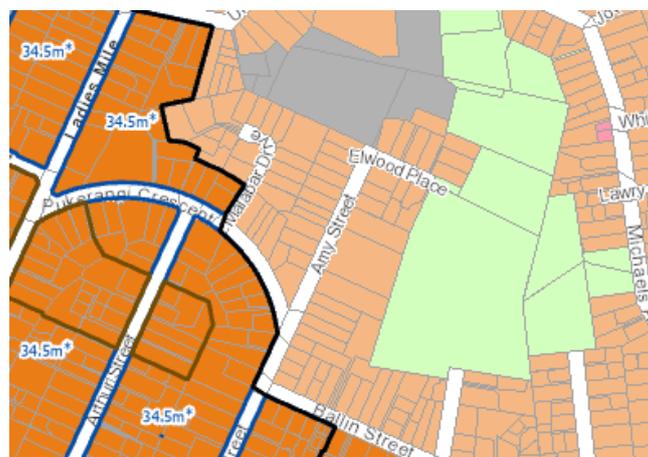
Medium density is being achieved adequately in this prominent coastal ridge area under existing MHS settings. MHS should be reinstated for the area depicted below, from the Coates Ave walkway and across Felton inclusive.

E mahi ana mātou i te mahi mō Tāmaki Makaurau



Amy Street - Surrounds to Michaels Ave Park

Given the impact of extended 34m walkable catchment across much of Ellerslie, **Orakei recommends** MHS is reinstated for the residential areas surrounding Michaels Ave Park from Amy Street west side, Ratlin Street north side and Elwood Place to provide a balanced housing choice and a lower density neighbourhood for better integration to the open space reserve.



Meadowbank Road and Temple Street

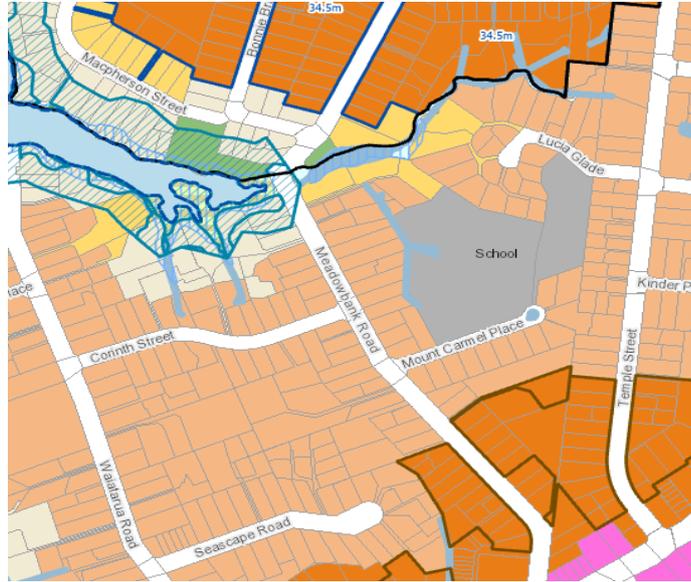
The northern Meadowbank area within a train station walkable catchment is only accessible by two narrow feeder roads: Meadowbank Road and a speed-humped Temple Street.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

Meadowbank Rd and Temple Street provide a main feeder route for local schools and help distribute the density foreseeable in this enclosed north catchment area.

Imposing THAB density in this catchment location will only be better served if both sides of these two feeder streets are reinstated as MHS, not MHU, helping enable better connectivity and access to housing, nearby shops, schooling, and the train station itself.

“Townhouses, when pushed into leafy suburbs do not deliver meaningful density or character, they



erode garden streets without solving housing supply at scale. Reducing some MHU back to SHZ and MHS in Orakei would be supported.”

– reputed Ōrākei developer of quality high end, medium density

4. Plan technical matters: MHS v proposed new MHU (MHS – 9m, 40% current MHU – 12m, 60%).

Ōrākei is advised that more capacity is provided than the (*operative*) 2016 MHU, particularly on smaller sites, but buildings are not packed as closely together horizontally as they would be under the MDRS. Spatially we are advised there is less MHU, but more THAB and more MHS than PC 78 (*across the whole city*).

Looking at the maps, we fail to see how there is less MHU in Ōrākei. Ōrākei has been blanketed with MHU where MHS once was but has managed to exceed medium capacity supply annually over the last term under current plan settings.

That is why Ōrākei strongly recommends reinstating some pockets of MHS (or SHZ) as detailed above, to enable better design integration and housing choice.

Key differences between the new MHU zone and the MDRS are said to be better quality outcomes rather than a significant difference in capacity.

A significant main change to the standards is the use of the AUP alternative HIRB as a permitted activity along an entire site length.

Ōrākei acknowledges this is not quite as much as the MDRS HIRB but may allow more effective 3-Storeys on some sites.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

Ōrākei recommends standards are changed so to revert to the main HIRB rule and not confuse people with an 'alternative HIRB' rule becoming the default setting.

We note many other technical changes that allegedly improve the quality of the outcome but do not necessarily affect calculated nominal capacity much, such as an 'all standards apply' approach.

We have simply had insufficient time to analyse the five hundred pages or so of technical standards information.

28 August 2025

Member Troy Churton

Planning Portfolio Lead, Ōrākei Local Board

Chapters of the proposed plan the local board had insufficient time to analyse appropriately:

A: Introduction

B: Regional policy; Urban Growth & Form

C: General Rules

D: Overlay

E: Region wide rules - Infrastructure - incentivize infrastructure lead development and design Subdivision

F:

G: RUB, Walkable Catchments, Height controls

H: Zones

I: Precincts

J: Definitions

K: Designations

L: Schedules

M: Appendices

Ōtara-Papatoetoe Local Board

Resolution number OP/2025/105

That the Ōtara-Papatoetoe Local Board:

- a) tuhi tīpoka / note that the Local Board are not the decision-makers on zoning or planning matters and appreciate the opportunity to provide input on this important matter, requesting that our views and those of the communities we serve be considered in full as part of the Policy and Planning Committee’s decision-making process.
- b) tuhi tīpoka / provide the following feedback on the withdrawal in Part of Proposed Plan Change 78 – Intensification and the draft plan change:
 - i) tautoko/ support the withdrawal in part of Plan Change 78 – Intensification
 - ii) tautoko/ support the draft replacement plan change documents below:
 - [Chapters A, B, C, D, E, G and H](#)
 - [Chapter I](#)
 - [Chapters J, K, L, M and Ōtara -Papatoetoe Map Series.](#)
- c) tuhi tīpoka / note in regard to the timeline and process used to create the replacement plan change, the Board:
 - i) tuhi tīpoka / note that this is the result of legislation and Auckland Council does not get to choose if there is housing intensification or how much, only where. Legislation requires Auckland Council to provide the same or higher capacity than Plan Change 78 – there can be no net reduction.
 - ii) tuhi tīpoka / note legislation allows only two options – continue with Plan Change 78 or replace it with another plan providing the same capacity.
 - iii) tuhi tīpoka / note that the legislation requires Auckland Council to publicly notify the replacement plan change by 10 October 2025 or proceed with Plan Change 78.
 - iv) tuhi tīpoka / note given that the Act only received Royal Assent on 20 August 2025, this creates an extraordinarily short time frame to develop, consider, and notify a significant change for Auckland’s key planning tool.
- d) tuhi tīpoka / note with concern the lack of time for wider public consultation prior to notification and that many local residents will still be unaware of the discussion.
- e) tuhi tīpoka / note that the proximity to the Local government elections (as required by legislation) has constrained elected members ability to engage with the community.
- f) tuhi tīpoka / note in regard to the replacement plan change itself:
 - i. tautoko/ support the targeted application of density on transport corridors and town centres providing access to jobs, education and services enabling equitable livability outcomes.
 - ii. tautoko/ support the targeted approach which ensures growth is appropriately constrained in areas subject to hazards and highly productive land.
 - iii. tautoko/ support design standards and controls such as height-to-boundary rules, privacy, setbacks, active frontages, and sunlight protections to ensure high quality urban outcomes and mitigate impact on neighbouring properties. Note the concern that a reliance on the market without sufficient standards will result in poor equity and housing outcomes in the lower value areas of the city.

- iv. tautoko/ support the inclusion of infrastructure as a qualifying matter. Infrastructure constraints should be recognized to stage or limit growth and infrastructure provided prior to, and support, any increased density. The limitations and uncertainty over funding responsibilities for infrastructure provision need to be taken into account in any development proposals.
 - v. tono / request that the consideration of infrastructure as a qualifying matter includes education to ensure local schools can support increased population, particularly relevant if any education sites are redeveloped for housing.
 - vi. tono / request a reconsideration of parking provision requirements in areas proposed to be upzoned as Intensification without targeted parking requirements is causing on-street congestion and can restrict access by emergency vehicles.
 - vii. tautoko/ support capping building heights at six storeys near Middlemore Station due to congestion and hospital proximity.
- g) tuhi tīpoka / note further to previous Board resolution (resolution OP/2022/179), any planning should consider the Ōtara-Papatoetoe Local Board Plan 2023 and the community aspiration for the transformative changes for the regeneration of the Ōtara Town Centre. The old Manukau Institute of Technology site if redeveloped offers the opportunity for integrated planning to deliver quality intensive housing, accessible public amenities, and much needed commercial and retail offering in Ōtara.
- h) tono / request strongly that staff work with the Ministry for Housing and Urban Development (MHUD) to withdraw its application under PC78 or any replacement plan change, and for MHUD to start a new private plan change, as it should have done previously, so that the Ōtara-Papatoetoe Local Board and Ōtara-Papatoetoe community can be fully publicly consulted on, via a private plan change, rather than hidden under a city-wide plan change brought about by central government demands for more intensification.

Papakura Local Board

Resolution number PPK/2025/136

That the Papakura Local Board:

- a) provide the following feedback on the withdrawal in part of Proposed Plan Change 78 – Intensification, and the draft replacement as outlined in the maps tabled:
 - 1) tautoko / support in principle the changes to Proposed Plan Change 78 to enable further intensification, particularly around transport nodes and metropolitan centres.
 - 2) The board strongly supports policy changes that generate good community outcomes that ensure infrastructure is close by for community cohesion such as: shops, parks and reserves, medical centres and schools.
 - 3) The board is concerned the plan change will result in a ‘concrete jungle’. Green space is very important as the city intensifies.
 - 4) Adequate road widths in new developments and off street parking are critical to accommodate utility and emergency vehicles and ease of traffic flows.
 - 5) the provision of public transport to support this plan change is critical including innovative approaches to alternatives to public transport, such as: city hop cars, e-scooters, on demand AT Local services.
 - 6) The cumulative effects of developments on any given street/area needs to be taken into consideration when accessing the applications.

Puketāpapa Local Board

Resolution number PKTPP/2025/56

That the Puketāpapa Local Board:

- a) support full public notification of the replacement plan change.
- b) tuku / provide the following views on the withdrawal in part of Proposed Plan Change 78 – Intensification.
- c) agree that there are significant issues with Proposed Plan Change 78 – Intensification including:
 - i) lack of ability to adequately manage natural hazards, which is a significant issue for Puketāpapa relating to flooding
 - ii) the blanket approach to enabling development provided by the Medium Density Residential Standards, which is not strategic or reflective of different local communities in Auckland
 - iii) the lack of provisions in the light rail corridor, which needs to be rectified following the cancellation of the light rail project
- d) tuku / provide the following views on the draft replacement plan change documents contained in the agenda report.

Replacement plan change – feasibility concerns

- e) note that the Independent Hearings Panel, after extensive expert analysis, established 900,000 dwellings as a defensible 30-year supply target, which central areas including Puketāpapa have been successfully delivering
- f) express serious concern that the proposed 2 million dwelling capacity target appears to have no infrastructure modelling, funding commitments, or delivery sequencing aligned to it
- g) note that infrastructure-led development, as successfully demonstrated in Singapore and the United Kingdom where land is only released with infrastructure in place, delivers superior outcomes to capacity-led development
- h) note the Board has significant concern with under provisioning of social infrastructure including parks and recreational facilities particularly given our current and anticipated shortfall with forecast population growth within our suburb. This situation will be significantly worsened with the intensification indicated in the suburbs surrounding us who already rely on our parks and recreational spaces.
- i) note the proposed plan does not provide for additional recreational space required to support the population growth enabled by the intensification indicated in the replacement plan change. This should be done as part of the infrastructure-led development approach as otherwise this may price the Council out of its ability to provision in the future.
- j) note that little appears to have been considered to increase the provision for business and light industrial zones that would be needed to support the increased population level.

Replacement plan change – process

- k) do not support central government directives which remove the ability for local communities to be involved in discussions, planning and decision-making processes relating to their neighbourhoods

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- l) request a process of full consultation through the plan change process, with adequate time for communities to understand and respond to proposals affecting their areas
- m) note that no zone proposals were notified within the light rail corridor under PC78, meaning those 45,000 affected property owners have had no opportunity for input
- n) request confirmation from Watercare and Auckland Transport regarding infrastructure capacity and funding before any plan change is endorsed.

CARRIED

Resolution number PKTPP/2025/57

That the Puketāpapa Local Board:

Replacement plan change – level of development

- o) do not support the proposed capacity for 2 million dwellings over 30 years, noting this would require infrastructure for a city of 6+ million people without identified funding sources
- p) oppose intensification to 15 storeys around rapid transit stations for example Maungawhau, Morningside, Kingsland and Greenlane Stations without demonstrated infrastructure capacity
- q) oppose intensification to 10 storeys around stations for example Mt Albert and Baldwins stations given existing infrastructure constraints
- r) note particular concern about 400-metre THAB zones along arterial roads where bus services are already at capacity (e.g., Dominion Road with 25-29 buses hourly).

CARRIED

Note: Pursuant with Standing Order 1.9.7 Member J Turner and Member B Shen requested that their dissenting votes be recorded.

Resolution number PKTPP/2025/58

That the Puketāpapa Local Board:

s) support retention of all qualifying matters including:

- i) built heritage and character, including historic heritage and special character areas
- ii) hazards, including coastal erosion and flood plains
- iii) infrastructure constraints, including combined wastewater networks requiring replacement
- iv) natural heritage including significant ecological areas, maunga viewshafts, notable trees and ridgeline protection
- t) request improved controls to manage interfaces between high-density and low-density zones
- u) request stronger approaches to limit development in flood-prone areas given the devastation from 2023 and 2025 flooding events. The Board is concerned that flood prone sites are still allowing for intensification. There are examples of new houses built within the last few years that have been significantly affected by flooding including but not limited to Christie Street and Penney Avenue.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- v) request the council advocate to government that any intensification targets must be accompanied by funded infrastructure plans, noting that CRL completion alone requires \$6.7bn additional investment
- w) express concern that accepting unrealistic targets without infrastructure planning creates an enormous economic burden for future generations.
- x) request future investigation on the classification of Donald Crescent as a “special character area” given this prevents intensification provisions along the Dominion Road corridor and does not seem correctly classified.
- y) support the removal of the ‘Special Character Areas Overlay – General: Foch Avenue and Haig Avenue’ following the onsite investigation of the overlay’s suitability by council staff, their recommendation that the overlay is not appropriate for this area, and that a specific instance of heritage is being added via a Historic Heritage Overlay. Noting most sites are cross leased with modern houses already built on each lot and some of the fencing and other built features are deviating from the special character provisions, so doesn't reflect the historical 1920s subdivision that is referred to in the Special Character Areas Overlay description any longer.
- z) whakamihi / thank Tian Liu for his attendance on-line via MS Teams.

Rodney Local Board

Resolution number RD/2025/2

That the Rodney Local Board:

- a) tuku / provide the following views on the withdrawal in part of Proposed Plan Change 78 - Intensification and draft replacement plan change:
 - i) express concern that briefings for the development of the replacement Plan Change 78 were held on Rodney Local Board meeting days, with no recorded information available, which has impacted the local board's ability to formulate effective feedback
 - ii) express concern at the time restriction for the local board views needed for the proposed plan, and the resulting impact to consultation for community and iwi in the revised plan change process
 - iii) support an extended period of public consultation for the proposed revised Plan Change 78 plan version (if approved), due to the complexities involved
 - iv) request clarity around what modes and frequency of public transport provision qualifies as a 'Frequent Transport Network Corridor Intensification Area' and 'Strategic Transport Corridor Zone'
 - v) request that the effects and benefits of the proposed plan change to specific community areas are identified and clearly communicated to consultation participants
 - vi) express concern the effects of proposed Resource Management Act changes to eliminate the rural urban boundary are not able to be addressed or considered through this review process
 - vii) strongly support the stronger controls relating to managing risks from flooding, coastal hazards, landslides and wildfires
 - viii) express concern that the proposed zoning responses for dealing with land that is subject to significant natural hazards only applies to urban residential zones and does not include sites within the rural zone that are subject to severe natural hazards (i.e. countryside living, future urban and mixed rural zones) therefore request that the plan change is amended so that rural properties that are of the highest risk of flooding, land instability and coastal hazards are downzoned to restrict the level of future development and prevent people from being exposed to these risks
 - ix) express concern that not more areas in Kumeū subjected to regular flooding have been downzoned including future urban areas
 - x) support that there is no upzoning proposed in the Plan Change 78 replacement plan change for Kumeū and Huapai
 - xi) support the proposed downzoning of 40 sections in Kumeū from Mixed Housing Urban to single house zone due to flood hazards
 - xii) support the proposed downzoning of five sections in Huapai from Mixed Housing Urban to single house zone due to flood hazards
 - xiii) support the proposed downzoning of 99 sections in Snells Beach from mixed housing suburban to single house zones due to coastal inundation
 - xiv) support the removal of the special character overlay for 34, 46, 48, 50 and 50A Commercial Road, Helensville that do not meet the criteria to be included
 - xv) support the proposed removal of three-storey medium density residential housing zone in Warkworth township and Milldale areas that was imposed as part of Plan Change 78

E mahi ana mātou i te mahi mō Tāmaki Makaurau

- xvi) support that the Plan Change 78 replacement plan would not include any upzoning at Milldale and Warkworth
- xvii) note that that the zoning pattern around Te Honohono ki Tai Road is not proposed to change as part of the Plan Change 78 replacement plan change, and that the medium density around this area is the current zoning in the unitary plan as result of Private Plan Change 40 that was made operative in June 2021
- xviii) note the proposed Plan Change 78 replacement plan change does not include zoning changes at Wellsford, Omaha, Point Wells, or Matakana
- xix) express concern that the changes proposed to the of the height to boundary ratios in areas that have been upzoned in the Rodney Local Board area will adversely affect the sunlight and privacy of the adjacent areas that have not be upzoned and request that the plan is amended so any adverse effects are mitigated in properties bordering the new upzoned areas and suggest the following:
 - larger setbacks from boundaries are required on land parcels adjacent to a zone change area
 - where possible green zones are used to separate land parcels adjacent to high intensity areas, or where there are significant zone changes with activities with direct or reverse sensitivity amenity and nuisance affects
- b) tono / request that the J1 definition of activities sensitive to natural hazard if damaged, that may create a significant public health or pollution issue during / after a natural hazard event be expanded to include the rural storage yards for portaloos, scaffolding, containers and pallets.

Upper Harbour Local Board

Resolution number UH/2025/114

That the Upper Harbour Local Board:

Views on the overall proposal

- a) tautoko / support the withdrawal in part of the Proposed Plan Change 78 as it has allowed inappropriate development (e.g in low lying and flood prone areas) noting that many residents did not support Plan Change 78 so do not support using it as a base to compare the new replacement plan change to
- b) express disappointment with the below actions of central government:
 - i) the Government is only allowing the withdrawal of Plan Change 78 if an additional 2,000,000 houses are enabled
 - ii) councils decision making ability is limited compared to under the normal RMA
 - iii) incredibly tight time frames restrict normal consultation processes
- c) tono / request that robust community consultation is held if this plan change replacement progresses and that council provide information sessions to explain the process and to help the community with submissions
- d) is of the view that generally increasing density around rapid transit and town centres is a good idea
- e) is of the view that the timeframe is too tight and restricts our ability to provide meaningful consideration and feedback and to have studied the maps and supporting documentation
- f) tuhi tīpoka / note that many residents are extremely concerned about the lack of infrastructure planning, there is no infrastructure plan with this new replacement plan

Views on the proposal for the Upper Harbour area

- g) tono / request that the entire property at 56 Fairview Road is all included in the walkable catchment as it is under Plan Change 78
- h) tono / request Herald Island is not upzoned from single house, the infrastructure is not suitable. For example there are swales for stormwater drainage and footpath only on one side of the road. This is not a well-functioning urban environment that should be intensified
- i) tuhi tīpoka / note that many parts of Greenhithe (e.g Olwyn Place) have no footpaths and swales for drainage. Again, that is not a well-functioning urban environment and should not be intensified
- j) express concern about the increase in zoning around the Hobsonville Town Centre. There are many dangerous intersections off Hobsonville Road (e.g Trig Road, Brigham Creek Road and Wisely Road) and there are no funded plans to address these, and consider that allowing intensification ahead of plans to fix these intersections is an unsafe option
- k) express concern around the new walkable catchments in Albany around the Constellation and Oteha Valley Stations. Housing is currently zoned much lower and suddenly it is planned to be enabled to 10 stories, request that there is appropriate step downs from the 35M zone to the residential zones

E mahi ana mātou i te mahi mō Tāmaki Makaurau

l) acknowledge that there are ongoing discussions and negotiations with Auckland Council, Kainga Ora and Te Kawerau a Maki for the land at Te Onekiritea / Bomb Point and the community desire for this land to remain public open space

m) tono / request there be a zoning response, or a single house zone alongside the Rural Urban Boundary.

Waitākere Ranges Local Board

Resolution number WTK/2025/111

That the Waitākere Ranges Local Board:

a) tautoko / support the withdrawal in part of proposed Plan Change 78.

b) tuku / provide the following feedback on the draft replacement Plan Change:

i) as a general principle, support housing intensification in the right places that contributes to a quality urban environment. We do not believe all of the proposed housing intensification in our area is in the right place.

Terraced Housing and Apartment Building Zone

ii) support the Terraced Housing and Apartment Building zoning in a walkable catchment around Glen Eden Train Station to support development of an exemplar compact town centre, subject to strengthening the requirements in the Unitary Plan to create a quality urban environment.

iii) support the Terraced Housing and Apartment Building zoning in a walkable catchment around Sunnyvale Train Station, given its access to public transport, parks and facilities, walking and cycling connections, as well as being reasonably near to shops and services in Henderson.

iv) do not support Terraced Housing and Apartment Building zoning around Swanson Train Station at this time, noting that Swanson sits on the edge of the Heritage Area and Rural Urban boundary.

v) support the Redwood Park Golf Course, in Swanson village, remaining as open space zone following the recent private plan change.

vi) would like to see a mechanism to sequence housing intensification in existing urban areas around employment and education access and transport hubs.

Mixed Housing Zone

vii) recommend the Glen Eden suburban area, west of Rosier Road, remain as Single House Zone or, if it is to be up-zoned to increase housing capacity, that it is Mixed Housing Suburban Zone only. This recognises it is on the edge of the urban area, borders the Waitakere Ranges Heritage Area, and has fairly low access to public transport (a bus every 30 minutes). And recommends the same approach for the area south of Glengarry Road, Glen Eden and Kaurilands.

viii) do not support the proposed Plan Change to upzone the Rosier Road area as Mixed Housing Urban. It is a relatively car dependent area. Intensification in the wrong places is creating road safety issues with the conflict between on-street parking demand and increased traffic movement with no council investment to address the problem.

ix) consider that there is a lack of coherence in suburban areas where post-war housing is being demolished and replaced with barrack-like housing on long narrow single sections with little street frontage.

Parking and access

x) on-street car parking and traffic impacts is a significant issue in areas where housing is intensifying without the accompanying benefit of transport investment to upgrade roads and public transport services.

E mahi ana mātou i te mahi mō Tāmaki Makaurau

xi) safe pedestrian access, as well as access for fire and emergency, and waste services are essential standards for development with multiple dwellings.

xii) accessible parking on-site for new residential developments is an important lifeline for residents with disabilities and their support services and contributes to Auckland being an age-friendly city.

Design standards and outdoor space

xiii) note that the largest change in travel behaviour shown in the 2023 census is the rise in those working from home rather than travelling to work. The trend supports the need for quality homes, placemaking, and more emphasis on creating a quality urban environment in local areas.

xiv) strongly support having mandatory design standards for housing development to improve housing quality, particularly in relation to:

- A) outdoor living spaces
 - B) building form and appearance
 - C) preserving special character with new development
 - D) permeability of sites for connectivity, eg greenways connections.
- xv) recommend that open space provision be a requirement for larger developments.
- xvi) recommend avoiding upzoning land with Significant Ecological Areas or Notable Trees as it otherwise risks inviting developers to strip the land.

Waitematā Local Board

Resolution number WTM/2025/140

That the Waitematā Local Board:

- a) appreciate the opportunity to provide input, request it be considered as part of the Policy and Planning Committee's decision-making process and further request the right to speak at any meeting of that committee considering this matter.
- b) note with concern the undue haste of the process (which has meant the local board's expectations of quality advice has not been fully met), the lack of time for wider public consultation prior to notification (many local residents will still be unaware of the changes proposed) and the uncertainty of the process going forward.
- c) recommend that the Governing Body formally request an extension of time (perhaps six months) in which to consider various options and the views, interests and needs of our communities now and in the future. In addition, propose that council support the initiation or refresh of local masterplans in which the community can be involved.
- d) note that the proximity to the local government elections has constrained elected members' ability to engage with the community on these matter
- e) agree that there are significant issues with Proposed Plan Change 78 – Intensification noting in particular:
 - i) the lack of ability to adequately manage natural hazards, which is a significant issue in the Waitematā Local Board area in relating to flooding
 - ii) the blanket development enabled by the Medium Density Residential Standards would be an inefficient way to develop Auckland given the deficit of both planning and funding for the necessary infrastructure associated with intensification, and it would also be an irreversible disaster in terms urban design
- f) oppose Plan Change 78 (PC78) as a whole because these plans impose inappropriate, high-intensity zoning in areas that lack supporting infrastructure, threaten the heritage and character of communities of interest, and undermine the wellbeing of existing communities.
- g) note with concern the lack of clarity around the logic for providing for a capacity of 2,070,000 dwellings in Auckland.
- h) note with concern the lack of clarity on how capacity is measured under different zoning rules and this constrains the local board to give meaningful feedback on balancing capacity provision in a way that may deliver better urban outcomes.
- i) recommend that good urban design outcomes are front of mind in developing the replacement plan change that will lead to the actual delivery of homes that people will want to live in, in locations where they want to be.
- j) recommend that access to sites of ancestral significance to iwi and hapu is retained.
- k) support the removal of Medium Density Residential Standard (MDRS) which enables three homes of up to three storeys high on most residential sites without resource consent. Replacement plan change
- l) support PC78 replacement plan change (RPC) at a high level but oppose in terms of its proposed scale in certain locations, as indicated by the various residents' groups who have consulted with the

Board on the RPC, and which is referred to in the body of our feedback as well in their direct correspondence on the matter as attached to this feedback.

m) accept the RPC's rationale of intensification around transport nodes, and walking catchments, although the methodology for walkable catchments remains a matter for contention.

n) note that the intensification enabled will require extra amenity and infrastructure (inc utilities, schools, healthcare, community and recreational facilities) that at this stage is generally unplanned and unfunded and this needs to be addressed as and when development is realised.

o) support the strengthening of controls to manage risks from flooding, coastal hazards, landsides and wildfires, giving council greater ability to avoid developments that may create risk, and request sufficiently strong approaches to limit development in floodprone areas and across overland flow paths.

p) urge more consideration when planning, of changes in weather, heat and more intense rainfall, by enabling more trees and planting to cool streets, retain and manage stormwater, provide shade and connection to nature and encourage water retention, and by providing for more on-site energy generation.

q) support rules on deep soil provision and we recommend landscaping minimums of 40-50% on all sites, including urban and mixed-use zones, though some landscaping may be on roofs, walls and balconies as well as the ground.

r) support retention of all qualifying matters including SCA's and infrastructure. constraints as notified for in PC78 as originally notified.

s) support THAB zones being upzoned to enable six storey development.

t) support THAB standards enabling perimeter blocks both within and outside of walkable catchments.

u) request improved controls to manage interfaces between high-density and lowdensity zones.

v) urge less use of 50m zoning where inappropriate and more enabling of six-storey housing across the isthmus (eg. we do not support enabling towers in the middle of SCAs, or historic low-rise areas where the topography is difficult, for example, the parts of St Mary' Bay accessible via Jacob's Ladder).

w) we note that once a site has been upzoned it is almost impossible to downzone. An incremental approach at this stage would provide more flexibility to take a precinct approach in future that would likely enable more housing that is feasible and deliverable.

x) note that the local market for expensive high-rise apartments is small, but these can suck up infrastructure capacity and the possibility of a dominant tower may have an unintended effect of disincentivising mid-rise development that is more desirable.

y) reiterate our feedback on PC78 on 13 December, 2022, as it still applies: • Resolution number WTM/2022/222, paragraphs b) v)-xliv) • Resolution numbers WTM/2022/223, WTM/2022/224, WTM/2022/225 and WTM/2022/226 regarding Walkable Catchments, • Resolution number WTM/2022/227 regarding Council's SCA assessment methodology.

z) Support a full consultation process submissions, further submissions and hearings.

Recommended options to add capacity in lieu of some 50m buildings proposed

aa) enabling perimeter block developments as a permitted activity in THAB zones, mixed housing urban and suburban housing urban zones to create high quality flood resilient family housing. This may be most appropriate in areas where there is a grid (eg. Grey Lynn/Westmere), by making an exception to height to boundary rules (eg, as per Christchurch Plan 14A.5.2.6.b.v).

bb) recommend measures be explored that encourage perimeter blocks and respond to long narrow sites, our climate and the kiwi desire for greenspace. In residential areas this might look like a four-meter front yard setback, no side yard setbacks, an exemption to height to boundary rules for 20m and a backyard setback of at least 10m. This could deliver 12 apartments, or 8 apartments and two family duplexes, where there is currently one single house, a front yard with 50% landscaping, and usable contiguous green space at the back.

cc) recommend council be proactive in encouraging and enabling good urban form by developing form codes, design guidelines, pattern books, multi-proof consents, officer advice (including expert peer review that enables and encourages smart innovation), packaging up projects with consents attached, working with architects, developers and design experts to communicate what the future of the city could look like, and use any other means available to encourage quality development at scale.

dd) recommend that half of the mixed housing urban zones in Waitemata are rezoned THAB to make up capacity, on or close to arterial routes.

ee) recommend more bus corridors are upzoned to 4-6 storeys across the isthmus.

ff) recommend upzoning the area around any rail station including those to the East, and the South as well as the Centre and West.

gg) recommend that any large land parcel in the Auckland region within a walkable catchment to an existing or planned rail station or regular reliable bus route (i.e. not necessarily an existing centre) might be significantly upzoned and master planned to support dense development that would include amenities, shopping, parks, early childhood centres (as is common in Vienna).

hh) a precinct masterplan around the Grey Lynn shops to support mixed use development might be considered and consulted upon.

ii) encourage development in Newmarket which is a logical place to be intensified due to its amenity and excellent accessible transport.

jj) continue to encourage the adaptive reuse of heritage buildings, office buildings, and special character homes to expand housing provision.

Feedback on particular suburbs

Recommend changes are made to the replacement plan change in response to the following concerns from various quarters of the community that have provided feedback in the narrow window of time provided since legislation made withdrawal of PC78 possible (emailed correspondence is attached).

Herne Bay

- Herne Bay Residents Association (HBRA) think Special Character Areas (SCAs) in Herne Bay that are outside the designated walkable catchment and which are accepted by Council as a Qualifying Matter and are inappropriate areas in which to have to have the higher density Policy 3d areas as mapped.
- There is a zoning anomaly under 'Management Layers' with 'Policy 3d - Upzoning around Centre zones' applied incorrectly over the Historic Heritage Overlay Extent of Place applicable to AUP Schedule 14.1 ID 02516: Ardmore Road, Wanganui Avenue, Albany Road and Trinity Street Historic Heritage Area, noting that Map 14.2.1.1 includes the shops on Jervois Road at the northern end of Ardmore Road, Wanganui Avenue and Albany Road.
- HBRA do not support new THAB projecting into Salisbury Reserve.
- Between Wallace and Curran Streets where there are SCAs and the rules say 6 storeys or more, HBRA would like some certainty about the height for THAB,

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- Until they know the final status of RMA and the NPS-UD, HBRA call for an extended period for submissions and further submissions along with hearings
- Like others in the community, HBRA question the Logic and necessity of a 2 million capacity in Auckland right now There has been little planning for infrastructure and a quality urban outcome.

St Mary's Bay

- Infrastructure is the overriding concern in St Mary's Bay. Watercare has declared it seriously inadequate, a fact reflected in the restrictive Qualifying Matter (QM). St Mary's Bay Association (SMBA) believe that council acknowledged (by signing the Environment Court Consent Order resolving the appeal by SMBA and other had against the St Mary's Bay Tunnel in 2022 that Saint Marys Bay infrastructure is not fit for purpose and as such the order should remain.
- Notwithstanding a strip of single house zone along cliff edge, the THAB upzoning behind that will result in a 50% increase in hard surface will by 50%. Separation of Saint Mary's Bay will not be considered before 2035 and so SMBA considers until stormwater separation is achieved, the whole area should retain Infrastructure as Qualifying Matter as per PC78 QM along with the same operative AUP zones and Special Character Area overlay in place.
- SMBA had major issues about the concept of walkable catchments and how they impact on Saint Mary's Bay, and the fact that those walkable catchments take insufficient accounts of topography. They consider that the walkable catchments should be based not on walkability to the edge of the city centre but rather to align with actual City Centre destinations.
- SMBA dispute the methodology on special character.
- SMBA identified that there are access issues/safety issues not properly taken account of (e.g. Jacob's Ladder, about which Auckland Council wrote to SMBA in 2022 advising them not to use these steps at night because they were dangerous), and Reason as well as the 60 steps, SMBA thinks Jacobs Ladder shouldn't be considered for the purposes of walkable catchment calculations. It urges Council to follow the international expert advice of its consultants Gehl and Associates (2010) and remove Jacobs Ladder from the calculations of walkable catchments as this route is often inaccessible.

Freeman's Bay

- Freemans Bay Residents Association (FBRA) seek full reinstatement of the Operative Special Character Area Overlay across Freemans Bay and in particular the inclusion of 1a-29 and 18-28 Ireland Street, 32 England Street, 9 Middle Street, 40-82 Franklin Road, 2-8 Ryle Street, 32-34 Wood Street and all of Arthur Street (both sides). They also dispute the SCA methodology used in PC78.
- They consider the 50m zoning in Arthur Street and Ireland Street have non-complying road widths and present a major obstacle to development.
- FBRA recommend that area adjacent to SCA be sensitive to it. 50m is too high when in the middle of SCA, or surrounding SCA.
- FRBA consider the 50m across Freeman's Bay should be reduced to be 22.5m and seek in particular that the 50m in Spring Street should be removed on the basis that there was a Consent Order limiting on that site with a setback.
- FBRA request that the publicly notified plan change have the usual submission and further submission process with hearings so that the public many of whom have spent a lot of money preparing for PC78 may have a say.

Parnell

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- PC78 and its section 32 report noted walkable distances were mapped as a desktop exercise and not ground-truthed due to Covid restrictions. The distances did not adequately take account of topography and the Port edge should not be used as part of the access to the City Centre
- Parnell faces similar infrastructure limitations to Saint Marys Bay and with many aged pipes, and with little having been done two separate wastewater and stormwater, the lack of adequate infrastructure should be a relevant qualifying matter to limit intense development of the scale anticipated.
- Parnell Heritage considers that special character areas should be maintained as notified in the AUP 2016 and they question the SCA methodology.

Newmarket

- This is a logical place to intensify, and should be encouraged by officers working with developers perhaps in lieu of some of the higher intensification proposed in Parnell.

Ponsonby

- Do not support 50m zoning on Vermont St or Arthur St, both of which are in the middle of the SCA. It is uncertain how Arthur St would be serviced or assisted during an emergency.

Grey Lynn

- There is support for the replacement plan change proposal, including the retention of SCAs and the densification of the Great North Road ridge though there are some concerns about shading on the Arch Hill side.

Whau Local Board

Resolution number WH/2025/93

That the Whau Local Board:

- a) welcome this opportunity to give feedback on the withdrawal in part of Proposed Plan Change 78 and the draft replacement plan change.
- a) tautoko / support the proposed alternative plan change which will align more closely with the Auckland Unitary Plan.
- b) tuhi tīpoka / note concerns with the limited consultation period for the proposed alternative plan change due to central government timelines.
- c) tuhi tīpoka / note its consistent support for intensification that is supported with adequate infrastructure.
- d) tautoko / support 800 metre walkable catchments and associated increased building heights of metropolitan centre zones and rapid transit network stops, noting that this designation includes Avondale, Fruitvale and New Lynn.
- e) tuhi tīpoka / note the congestion on roads with railway level crossings, particularly on St Jude Street and Fruitvale Road, hinders the success of intensification in those areas
- f) tautoko / support more intensive development within 200 metres of either side of the Great North Road corridor, noting that a high proportion of this corridor would be in the Whau local board area.
- g) tautoko / support opting out of the blanket Medium Density Residential Standards, which would result in a reduction in the amount of land zoned for three storey standards for residential Mixed Housing Urban zone.
- h) tautoko / support an increase in the amount of land zoned Mixed Housing Suburban which enables two-storey medium density housing.
- i) tautoko / support qualifying matters around inadequate infrastructure, noting that the proposal acknowledges parts of Blockhouse Bay as needing improved wastewater infrastructure.
- j) tautoko / support stronger controls to manage the risk in areas of natural hazards including the down-zoning of properties that are at the highest risk from flooding and coastal hazards.
- k) tuhi tīpoka / note the level of storm damage to coastal properties bordering the Manukau Harbour in Green Bay and Blockhouse Bay in early 2023.
- l) tuhi tīpoka / note particular concerns over the high proportion of flood plains and overland flow paths across the Whau local board area and welcome moves to have greater control over the nature of development in properties subject to those hazards.
- m) oppose the removal of any maunga view shafts, noting viewshafts in New Windsor and Avondale.
- n) note the proposal to remove the only heritage area in the Whau local board area, between Rosebank Road and Walsall Street, Avondale, and request that the shops within this heritage area at 19 and 25 Rosebank Road be given heritage status.
- o) note that the Avondale Racecourse land is currently zoned as special purpose for recreational, and understand that the proposed replacement plan change does not alter this.

Auckland Unitary Plan - Plan Change 78 and Draft Replacement Plan Change

Summary and themes from Local Board business and extraordinary meeting resolutions 26 August to 4 September 2025

A. Local board views – headline resolutions

Withdrawal of Plan Change 78

Nine local boards support withdrawal of Plan Change 78:

Devonport-Takapuna, Upper Harbour, Waitākere Ranges, Whau, Waitematā, Maungakiekie-Tāmaki, Papakura, Kaipātiki, Ōtara-Papatoetoe

Two local boards oppose or raised significant issues with Plan Change 78:

Howick, Albert-Eden

Eight local boards unstated or unclear on withdrawal of Plan Change 78:

Franklin, Hibiscus & Bays, Puketāpapa, Ōrākei, Rodney, Manurewa, Henderson-Massey, Māngere-Ōtāhuhu

No local boards support Plan Change 78

Draft replacement plan change

Eight local boards support draft replacement plan change:

Devonport-Takapuna, Franklin, Puketāpapa, Whau, Henderson-Massey, Papakura, Kaipātiki, Ōtara-Papatoetoe

One local board supports draft plan replacement change in part:

Maungakiekie-Tāmaki

Nine local boards unstated or unclear on supporting draft replacement plan change:

Hibiscus & Bays, Ōrākei, Rodney, Upper Harbour, Waitākere Ranges, Albert-Eden, Manurewa, Waitematā, Māngere-Ōtāhuhu

One local board opposes draft replacement plan change:

Howick

B. Themes expressed by local boards in support of replacement plan change

Natural Hazard Protections

- Support stronger requirements for flooding, coastal erosion, inundation, landslides, wildfires.
- Support downzoning of high-risk areas.
- Support updated hazard maps.
- Support council ability to avoid unsafe development.

Housing Density and Zoning

- Support targeted intensification: 2-storey housing.
- Support 10–15 storey buildings near rapid transit.
- Support intensification near CRL stations and bus corridors.
- Support removal of blanket MDRS.
- Support Single House Zone in sensitive areas.

Qualifying Matters and Heritage

- Support retaining heritage protections, Māori sites, volcanic viewshafts, ecological areas, and new historic heritage areas.
- Support new qualifying matters: Coastal Character, Lake Pupuke, Aircraft Noise, Education facilities, Environmental & Cultural features.

Urban Design and Housing Quality

- Support mandatory design standards (outdoor space, form, privacy, permeability, special character integration).
- Support placemaking.
- Support open space provision in large developments.
- Support THAB Zone perimeter block standards.

Transport and Infrastructure Integration

- Support intensification where infrastructure is adequate.
- Support sequencing growth around jobs, education, transport hubs.
- Support defined walkable catchments.
- Support alignment with transport strategies.
- Support standards for parking, pedestrian, and disability access.

Community and Environment Outcomes

- Support compact, climate-resilient growth.
- Support open space retention (e.g. Redwood Park, Avondale Racecourse, Te Onekiritea).
- Support recognition of community flood concerns.
- Support improvements to affordability and equity in intensification outcomes.

Process and Consultation

- Support full public notification, extended consultation and hearings.
- Support acknowledgement of community and iwi/hapū voices.
- Support council opt-out of MDRS while meeting housing capacity targets.

C. Themes expressed by local boards not supportive of replacement plan change and what they want to change about it

Infrastructure & Funding Constraints

- Concerns about inadequate wastewater, stormwater, transport, schools, and parks infrastructure to support intensification.
- Requests for staged growth aligned with infrastructure delivery.
- Lack of funding transparency and need for central government investment in social infrastructure.

Flooding, Natural Hazards & Environmental Risks

- Opposition to intensification in floodplains, coastal erosion areas, and unstable land.
- Calls for stronger hazard protections after 2023/2025 weather events.
- Requests for downzoning in high-risk areas.
- Concerns over stormwater management and climate resilience.

Height, Density & Zoning Objections

- Opposition to blanket zoning of 15 storeys in walkable catchments and 10 storeys near stations.
- Requests for height caps (e.g., Middlemore Station at 6 storeys).
- Concerns about THAB zoning in smaller towns (e.g. Snells Beach, Warkworth).
- Opposition to blanket MHU zone replacing MHS zone.
- Desire for transitional 'step-down' zones between higher and lower density areas.

Special Character, Heritage & Amenity Protection

- Requests to retain special character overlays, heritage protections, volcanic viewshafts, and neighbourhood identity.
- Concerns about loss of amenity, shading, and inappropriate high-rise near heritage areas (e.g. Howick Village, Grey Lynn ridge, Arch Hill side).

Urban Design, Setbacks & Quality Controls

- Concerns about poor design outcomes from unregulated intensification.
- Requests for setbacks for tall buildings, urban design panels, stronger interface management, sunlight/privacy protections, and permeable surface requirements.
- Desire for higher quality standards to ensure equitable housing outcomes.

Consultation, Process & Legislative Concerns

- Concerns about short timeframes, limited public input, and central government directives removing local discretion.
- Requests for full public notification, extended consultation, and recognition of local board/community input.
- Opposition to central government overriding local decision-making.

Location-Specific Requests/Downzoning

- Specific objections to intensification in sensitive areas e.g. exclusion of Beachlands.
- Downzoning needed in Sunnynook, Remuera, Glen Eden, Milford, Browns Bay, Mairangi Bay, Herne Bay, Parnell, St Mary's Bay.
- Requests to retain open space zoning at Te Onekiritea / Bomb Point and other key community areas.

R Moffatt

September 2025

Plan Change 78 and possible replacement plan change – Consultation & updates

Policy and Planning Committee Workshop

10 September 2025





Purpose of workshop (across two sessions)

Streamlined planning process explained

Consultation results and responses

Updates since 21 August

Economic assessments



Draft Replacement Plan Change – Local board views and responses

Engagement with local boards on PC78 and possible replacement plan change

- Chairs and portfolio members invited to attend seven committee workshops since April 2025
- All local board members briefings on 18 July and 8 August 2025 (with local board-specific session on draft plan change mapping)
- Report to business and extraordinary meetings 26 August to 4 September 2025 including draft plan change text and maps

Recommendations:

That XX local board provides its views on:

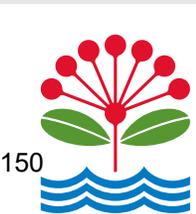
- i) the withdrawal in part of Proposed Plan Change 78 - Intensification
- ii) the draft replacement plan change included as Attachments

Local boards' views on draft plan change

 Support or endorsement for:	 Opposition or changes to:
<p>Housing growth in the right places – around rapid transit, frequent bus routes, and town centres.</p>	<p>Blanket 15-storey walkable catchments – especially in flood-prone or coastal areas.</p>
<p>Balanced intensification – with step-downs to protect nearby single house zones and special character.</p>	<p>Overly ambitious capacity targets (2M dwellings) – lack of infrastructure modelling, sequencing, and funding makes this unrealistic.</p>
<p>Infrastructure upgrades first – water, wastewater, stormwater, transport, schools, parks, and healthcare must be planned and funded alongside growth.</p>	<p>Infrastructure deficit – concerns that growth will overwhelm already struggling roads, schools, healthcare, stormwater and wastewater systems.</p>
<p>Retention of Qualifying Matters – heritage, special character, ecological areas, coastal and flood hazard protections, and infrastructure constraints.</p>	<p>Loss of character and heritage areas – strong opposition to rezoning special character and heritage areas.</p>

Local boards' views on draft plan change

 Support or endorsement for:	 Opposition or changes to:
<p>Urban design quality – stronger requirements for design review panels, setbacks, and landscaping to ensure liveable, attractive developments.</p>	<p>One-size-fits-all zoning – calls for staged or conditional upzoning linked to infrastructure delivery; more nuanced local approaches instead of blanket MHU/THAB.</p>
<p>Flood risk management – clearer rules, stronger language (“do not build” in high-risk areas), and public notification of developments in floodplains.</p>	<p>Natural hazard risks – opposition to intensification in flood zones, coastal erosion areas, or unstable land; calls for downzoning in these locations.</p>
<p>Community involvement – robust consultation, longer feedback periods, and genuine local input into where intensification happens.</p>	<p>Limited consultation timeframe – frustration at government-imposed deadlines reducing meaningful community engagement.</p>



Local boards' views – proposed response

Criteria for responding to local board requests for changes:

- ✓ Is neutral or minimal in terms of its effect on capacity i.e. capacity neutrality; and
- ✓ Does not result in (major) policy shifts; and
- ✓ Can be done within the time available.

Local boards' views – proposed response

Natural Hazards and Flooding

- **Boards wanted:** More downzoning, bigger setbacks, mandatory avoidance, and public notification in hazard areas.
- **Proposed response:** Accept in part – downzoning only in most severe flood zones; elsewhere rely on strengthened AUP hazard rules. Further downzoning/setbacks rejected (would cut capacity, conflict with NPS-UD).

MDRS, Zoning and Density

- **Boards wanted:** Remove MDRS, reinstate Single House zones, reduce heights in walkable catchments.
- **Proposed response:** Removal of MDRS noted; broad downzoning/height reductions not supported (breaches NPS-UD, must retain PC78 capacity).



Local boards' views – proposed response

Special Character and Heritage

- **Boards wanted:** Retain/expand overlays in some areas, remove overlays elsewhere.
- **Proposed response:** Overlays kept only where evidence supports “high quality” character; removals accepted where experts agree.

Height & Density Controls

- **Boards wanted:** Lower height limits, extra setbacks, perimeter blocks, form-based codes, stricter rules near schools/hospitals.
- **Proposed response:** Height reductions not supported (would undermine capacity, inconsistent with NPS-UD). Some design standards already included, looking into others.



Local boards' views – proposed response

Infrastructure & Social Services

- **Boards wanted:** Intensification sequenced with infrastructure, more parks, stormwater capacity, reinstated minimum parking, higher landscaped areas.
- **Proposed response:** Acknowledged, will be discussed at 17 September workshop. Minimum parking reinstatement not supported (prohibited under NPS-UD). Large landscaped % not supported (too restrictive).

Process & Consultation

- **Boards wanted:** Longer consultation, more local say, or delay/withdrawal of PC78.
- **Proposed response:** Requests for extended consultation constrained by RMA Amendment Act (tight deadlines).



5/09/2025

Unitary Plan Enquiries Team
Auckland Council

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Tēnā koutou

Feedback on draft replacement plan change to replace Proposed Plan Change 78

The Ministry of Education (the Ministry) thanks Auckland Council for the opportunity to provide early feedback to the Draft Replacement Plan Change to replace Proposed Plan Change 78 (draft plan change). We acknowledge the process for preparing and consulting with stakeholders on the draft plan change has been expedited, given it will be considered by the full Council on 24 September 2025.

This letter provides the Ministry's initial feedback on the draft plan change, and outlines two key changes the Ministry would like to see made to the draft plan change before it is released for public consultation. These changes will enable the Ministry to respond more effectively to the growth proposed. It also highlights the matters that are important to the Ministry as an infrastructure provider.

Due to the constrained timeframe available for preparing this feedback, it does not address any area or site-specific matters that may be raised in a future submission from the Ministry under the Streamlined Planning Process. An evaluation of potential implications on our longer-term network planning and property interests will be undertaken following notification of the Plan Change and, if necessary, reflected in a subsequent submission.

Background

The Ministry holds several key roles as Crown Agency, landowner and provider/developer of social infrastructure in the form of education facilities. To plan for future education requirements and to support well-functioning urban environments, the Ministry needs to understand the likely location, quantum, timing and type of growth that may occur.

Changes requested – prior to considering the Draft Plan Change for Public Notification

The Ministry requests that the following changes are made to the draft plan change before it is notified:

1. That all Minister of Education designations are removed from any qualifying matter mapping before it is released.
2. That in the residential zones, educational facilities are either a permitted or restricted discretionary activity.

Reasons for change

The residential intensification proposed in parts of the Auckland region will increase demand on the education network. Some Ministry sites are currently constrained in their ability to respond to that demand due to restrictive designation conditions or the increased education infrastructure not being anticipated and enabled in the residential zones that they support. These constraints limit the Ministry's ability to use its sites effectively and efficiently to accommodate growing student populations.

Across Auckland, our designated sites are subject to a range of conditions, including height in relation to boundary controls. The RMA Amendment Act 2022 (New Housing Supply Standards) which introduced provision 77M, allows the Minister of Education to apply the underlying zone's density provisions (where modified by a plan change to incorporate the MDRS provisions) where they are more enabling than the designation conditions.

However, the draft plan change identifies Ministry designations as a qualifying matter, meaning section 77M cannot be used until the plan change becomes operative. We request that all Minister of Education designations be excluded as qualifying matters in the draft plan change. This would enable the Ministry to use section 77M provisions now, supporting timely and effective planning for growth.

In addition, many sites have bespoke designation conditions that constrain the ability to maximise the use of our designated sites to accommodate growth. In areas identified for intensification, the planning framework should recognise the need for education facilities to be located and enabled in these areas.

We therefore request that education facilities be enabled as permitted or restricted discretionary activities in residential zones, with development controls aligned with surrounding residential activities. This would support the delivery of education infrastructure in areas where population growth is anticipated and ensure schools can meet future demand for student places.

Matters important to the Ministry as an Infrastructure Provider

As noted above, the Ministry provides essential social infrastructure in response to anticipated population growth across the Auckland region.

Crown agencies and Ministries have been working collaboratively with Auckland Council departments and organisations in the joint Crown and Council priority development areas such as Drury and the North West. These areas involve urbanising greenfield locations and require significant new infrastructure investment. The Ministry would support this collaborative approach being extended to established urban areas indicated for residential intensification under the draft plan change.

While the draft plan change enables capacity for up to two million additional dwellings, this represents "plan-enabled capacity" prior to consideration of supporting infrastructure that will be needed. Coordinated planning between public infrastructure providers is therefore useful to ensure growth can be sustainably managed over time and we welcome further engagement with Council on how this can be achieved.

The Ministry also notes that the draft plan change proposes stronger controls in the Auckland Unitary Plan to manage risks from flooding, coastal hazards, and landslides—particularly in existing urban areas. A number of school sites fall within natural hazard overlays and in the future may need to be expanded or redeveloped to accommodate



anticipated population growth. We would welcome the opportunity to work with Council staff to better understand any updated modelling or natural hazard information, to ensure we can manage and develop our sites appropriately.

The Ministry hopes the feedback we have provided will assist your process for finalising the draft plan change for consideration by the full Council Committee. We look forward to working collaboratively with Auckland Council as we have outlined in our feedback.

Nāku noa, nā

A handwritten signature in blue ink that reads "Blair Firmston".

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