

Submission on Auckland's Plan Change 120: Housing intensification and resilience

19 December 2025

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The New Zealand Infrastructure Commission (Te Waihanga) welcomes the opportunity to submit on *Plan Change 120: Housing Intensification and Resilience*. Our submission focuses on Plan Change 120 provisions that would materially affect the efficient use of infrastructure or the costs of consenting infrastructure activities. This is of national interest given that about 40 percent of New Zealand's infrastructure investment is located in Auckland.

We wish to speak to our submission.

The New Zealand Infrastructure Commission is an autonomous Crown Entity that provides independent advice to the Government about infrastructure. Our purpose is to co-ordinate, develop, and promote an approach to infrastructure that improves the well-being of New Zealanders. We have a legislative responsibility to produce long term national infrastructure strategy reports for the Government's response.

To this end, we recently consulted on a draft National Infrastructure Plan that identifies New Zealand's infrastructure needs over the next 30 years, and how we can get greater return for our significant spend on infrastructure. The National Infrastructure Plan will be provided to the Government for response in February 2026.

Our submission draws on the draft New Zealand Infrastructure Plan

Our submission draws on recommendations in the draft National Infrastructure Plan about Resource Management reforms and about increasing asset maintenance and resilience of existing infrastructure.

Plan Change 120 (PC120) would have greatest impact on the achievement of draft National Infrastructure Plan recommendation 8: *Land-use policies should enable new and existing infrastructure to be used by as many people as possible*.

This draft National Infrastructure Plan highlights the importance of upzoning areas around new public transport infrastructure, to allow more housing and commercial development that will then increase use of the infrastructure. It specifically mentions that zoning around the City Rail Link, one of New Zealand's largest infrastructure investments, is currently too restrictive to enable many new homes to be built near inner-suburban stations like Kingsland and Mount Eden. Without change this zoning would limit the use of the City Rail Link.

We support some aspects of Plan Change 120 and oppose others

The NZ Infrastructure Commission seeks the following overall decision by Auckland Council (Council): *Accept the proposed plan change with amendments outlined in this submission*. The following paragraphs provide an overview of key points in our submission and the key amendments we are seeking to PC120. This is followed by Table 1 which sets out more specifically the decision requests, including the

provisions we request Council to retain, and those that we request Council to remove or amend, and the reasons for these decisions requested.

In summary, NZ Infrastructure Commission requesting the following relief:

- a. PC120 is amended to address the key points in this submission and the more specific decisions requested in Table 1 of this submission.
- b. Any consequential amendments are made to PC120 to address the key points and decisions requested in this submission.

It would be beneficial for economic and other experts to caucus on the matters raised by our submission to inform the hearing. We would be happy to participate in such discussions.

1. Retain provisions enabling greater intensification around rapid transit and centres

We strongly support the greater enablement of development around high demand central urban centres and rapid transit proposed by PC120, relative to the previous Plan Change 78, in line with requirements of the Resource Management (Consenting and Other System Changes) Amendment Act 2025 (RM-COSC)¹. More specifically we support:

- The definition of the Walkable Catchments (15 minutes walk or 1200 metres from the edge of the City Centre zone and 10 minutes walk or 800 meters from other centres and existing and planned rapid transit stops)
- The broadened application of the Terrace Housing and Apartment Buildings (THAB) Zone enabling six storey buildings in much of these catchments
- The Height Variation control to increase heights in the THAB zone to 15 storeys around the Mount Eden, Kingsland, and Morningside Stations and 10 storeys around the Baldwin Avenue and Mount Albert Stations
- The reduced application of Special Character Areas Qualifying Matters in these areas.

We are comfortable that PC120 would also reduce housing capacity in less accessible and/or hazard-prone areas.

It is promising to see Council estimates that the redistribution of intensification opportunities would increase modelled plan-enabled housing capacity by 60 percent in the Albert-Eden Local Board area, 26 percent in the Waitemata Local Board area, and 25 percent in the Maungakiekie-Tāmaki Local Board area. These areas surround parts of the Auckland Rapid Transit Network.

¹ We note that these provisions are proposed to meet RM-COSC requirements that the Plan:

- Provide at least the same amount of total development capacity as was provided under Plan Change 78 (ie “plan-enabled” capacity for 2 million people).
- Enable, within at least a walkable catchment of City Rail Link (CRL) stations, heights and densities that respond to demand and are appropriate given the level of accessibility the CRL will provide to commercial activity and community services in these locations; and in particular enable building heights of at least:
 - 15 storeys within the walkable catchments of the Mount Eden, Kingsland, and Morningside Stations
 - 10 storeys within the walkable catchments of the Baldwin Avenue and Mount Albert Stations.

This should materially grow rail and bus patronage, increasing the benefits of significant public investment on rapid transit – especially the \$5.7 billion capital expenditure on the City Rail Link. Additional development around centres should expand the numbers of people walking to jobs and services there. Both outcomes should take pressure off the road network from other areas. These aspects of PC120 would facilitate a future urban form that is more efficient to service with infrastructure.

Redistributing development opportunities to surround rapid transit and centres should also improve the Council's ability to fund its growth-related infrastructure from growth. Our report *Paying it back: An analysis of the fiscal returns of public infrastructure investment* estimates that only about 45 percent of the "costs of growth" in Auckland have been funded from revenue generated by new residents since 2012. Enabling much more development where there is capacity in existing and new infrastructure can help turn this around. It will increase fare box revenue for rapid transit, as well as development contributions, rates and water rates from the intensifying areas. This would reduce the extent to which such infrastructure needs to be subsidised by people in the rest of the region who don't use it.

2. Amend various provisions to reduce constraints on development around rapid transit and centres

Despite our support for provisions enabling greater intensification, we request Council to go further and (following robust cost-benefit analysis/section 32 evaluation) amend provisions that would constrain the additional development around rapid transit and centres. These constraining provisions would undermine the benefits of the PC120 in maximising use of and revenue for rapid transit and other growth infrastructure in Auckland. The provisions that would restrict the density and heights of residential and business development that we request are amended include:

- The Single House Zone retained within significant parts of the walkable catchments of the City Rail Link stations and the City Centre
- The residential zoning applied in areas within walking distance of the future Te Ara Hauāuru – Northwest Busway
- The "qualifying matters" applied to upzoning in the walkable catchments for:
 - Special Character Areas - Residential
 - Special Character Areas - Business
 - Regional Maunga Viewshafts and Height and Building Sensitive Areas
- Matters of discretion, assessment criteria and rules to manage effects on amenity (such as character, height-in-relation-to-boundary, tower dimension, setbacks and outlook requirements); or matters internal to a site (such as the size of living areas, internal storage, outdoor living space requirements and internal sunlight access).

We request that Council evaluate and amend these provisions in each area "as a bundle" as they often overlay on top of each other. Removing individual constraining provisions while retaining others may not materially increase development capacity and the utilisation of infrastructure.

More specially, we request a reduction of the development constraints from PC120, to further increase:

- **Residential capacity around the City Rail Link.** This is still constrained by the retention in PC120 of much of the Single House Zone within the walkable catchments of Kingsland, Mount Eden, Grafton and Parnell stations. It is also constrained by the retention of the Residential Special Character Areas Qualifying Matter on 11% of land within the walkable catchments of the Kingsland, Mt Eden, Morningside, Baldwin Avenue and Mt Albert train stations, compared to

only 2.5% in all other walkable catchments. The retention of all of the Regional Maunga Viewshafts adds to this especially around the Mt Albert and Mt Eden stations. In addition, provisions to manage effects on amenity will likely require site amalgamation for taller buildings or will affect feasibility, further constraining development.

- **Business capacity around City Rail Link.** PC120 retains the Business Special Character Areas Qualifying Matter across the town centres within the walkable catchments of the Kingsland, Mt Eden and Parnell stations. The Special Character Areas assessment criteria emphasise keeping things as they are, and don't recognise the imperative of providing for growth in employment and services in these centres. Decisions based on these criteria would likely significantly restrict development below the 6 storey heights of the underlying zoning, preventing town centres from becoming destinations as well as origins along the City Rail Link to maximise its use.
- **Residential and business development capacity around other parts of the Auckland Rapid Transit Network including the proposed Te Ara Hauāuru – Northwest Busway.** This is a \$4 billion investment that will provide a 25-minute journey from Brigham Creek to Karanga-a-Hape station, with the capacity to move up to 9,000 people in each direction per hour. PC120 doesn't currently recognise the project, zoning most of the housing within walking distance as Mixed Housing Urban (which restricts density and heights to 3 storeys), when the THAB zone would provide for greater utilisation of the busway.
- **Residential capacity near City Centre.** The retention of the Single Housing Residential zone and the Residential Special Character Qualifying Matter in Freemans Bay, Ponsonby and Grey Lynn (which comprise about half of the residential sites near the CBD) significantly restricts the number of people who will be able to access jobs and services in the City Centre by active modes.

3. Amend or remove Combined Wastewater Servicing Constraint Qualifying Matter

PC120 proposes the Combined Wastewater Servicing Constraint Qualifying Matter to "signal" to developers where there *may* be real constraints in central Auckland's wastewater and stormwater capacity. It is a tool for Watercare and Council to manage risk that considerable development across a range of sites in the short term might exceed capacity and increase risks of overflows in wet weather events.

We request that Council amend the geographic application of this provision or remove it, after undertaking rigorous work to assess whether it is needed, and to quantify its impact on development capacity. On the face of it, the qualifying matter creates uncertainty for developers and would likely have a chilling effect on development (constraining the benefits of and funding for rapid transit). Additionally, we are concerned that:

- The Council hasn't provided sufficient evidence about the scale, location, duration or cost to fix constraints in central Auckland's wastewater and stormwater infrastructure. Watercare's central interceptor will be completed in 2026 before PC120 becomes operative, and Council has control over how fast it can deliver the supporting Western Isthmus Water Quality Improvement programme.
- A resource management regulation may not be the best way to manage infrastructure funding issues (by limiting growth). We also made this point in our submission on Plan Change 78, which opposed the then proposed Combined Wastewater Network Control. That submission highlighted how these controls may result in unintended consequences, restricting the very

growth that could help fund the infrastructure. It quoted a City Rail Link report on the CRL precincts public works implementation plan, which showed that transport, social, stormwater and water costs per household in the Mount Eden Station precinct would fall with increasing density.

- Watercare already has the power to decline connections, enabling it to control development risks to its network.

In addition, we recommend that Watercare review its pricing policies and Council explore infrastructure growth charges, development contributions and targeted rates to better align demand for and supply of wastewater and stormwater infrastructure to support growth.

4. Undertake rigorous cost benefit analysis of proposed regulatory constraints to intensification around rapid transit and centres

The Council's modelling provides very useful information about how much additional plan enabled capacity would be provided by PC120 compared with Plan Change 78. However, the modelling does not quantify how much additional capacity is foregone in walkable catchments around rapid transit and centres as a result of applying the Single House Zone; the Residential and Business Special Character Areas, Regional Maunga Viewshafts and Height and Building Sensitive Areas and Combined Wastewater Servicing Constraint Qualifying Matters; and the objectives, policies and standards that seek to manage amenity and internal effects in the Terrace Housing and Apartment Buildings Zone.

Section 32 evaluation reports have been prepared to justify various PC120 provisions. We do not consider these fully meet the requirements of the RM-COSC that the Council justify its proposed qualifying matters, including evaluating their wider impacts and costs.

We request that Council commission a more robust cost benefit analysis of the qualifying matters and other provisions that constrain development in PC120, which quantifies:

- The foregone residential and business development in centres and around rapid transit
- The foregone rapid transit ridership to and from these areas as origins and destinations
- The foregone numbers of people accessing the City Centre via active modes
- The foregone Development Contributions and fare box revenue that would help fund the rapid transit; and therefore the amount Council would need to subsidise from region-wide rates
- Using New Zealand Transport Agency's manual, the additional time and cost of people instead having to travel from other areas to the City Centre and other centres.

These costs should then be compared with the benefits of the qualifying matters and other development constraints identified by the Council.

We consider that the Council should also do further work to quantify the benefits of:

- Individual Maunga Viewshafts. We note that over time, trees, structures and buildings have obscured parts of some specific viewshafts, undermining the original rationale for their placement and their associated benefits.
- The Combined Wastewater and Stormwater Qualifying Matter. This should identify the scale, location, duration and cost to fix constraints in central Auckland's wastewater and stormwater infrastructure to support likely growth around rapid transit and centres as a result of PC120. It should consider the costs of delivering the Western Isthmus Water Quality Improvement programme on a faster timeframe to support this growth.

A full evaluation of the wider impacts and costs of Council's proposed qualifying matters would also quantify their impact on productivity benefits associated with agglomeration in centres, and equitable access to jobs and services in centres.

It would be beneficial for economic and other experts to caucus on this analysis to inform the hearing. We would be happy to participate in such discussions.

5. Amend natural hazards provisions to remove unnecessary constraints and consenting costs for infrastructure activities

The draft National Infrastructure Plan highlights the importance of infrastructure resilience. Our research *Invest or insure? Preparing infrastructure for natural hazards* emphasises New Zealand's vulnerability to natural hazards and identifies a range of approaches to provide for infrastructure resilience in the face of this. Which one is most appropriate depends on the likelihood and consequence of hazards and the cost of the approach. The report highlights the importance of quantifying risk and/or pricing it, to clarify the optimal risk management approach for infrastructure assets.

We support the intention of the PC120 to better respond to the level of risk to human life and property associated with natural hazards. We support the Council spatially identifying hazards and making this information public. We also support new objectives and policies in the urban residential zones to align with the hazards risk framework, and the proposed selective downzoning or application of a qualifying matter overlay as a method to limit significant natural hazard risk. The protection of human life and property where risk is significant appears to be an appropriate reason to constrain building height or density requirements.

We also support provisions that more clearly enable infrastructure activities with a functional or operational need to locate in a natural hazard area. These include rules that provide permitted activity status for the following infrastructure activities:

- the construction, operation, maintenance, renewal and repair of transport and underground utilities in all flood and coastal hazard areas; and of transport in all landslide susceptibility assessment areas
- activities associated with existing other infrastructure, subject to meeting standards.

These provisions recognise that when it comes to managing natural hazard risk, network infrastructure activities differ from other development or use of land. This infrastructure is often essential and cannot avoid natural hazard areas. The consequences of natural hazards on this infrastructure can generally be categorised as a loss of service, rather than a loss of life or serious damage to property. The infrastructure providers are enduring operators and stewards of their assets, with incentives, legal obligations and the best technical expertise to manage the consequence of natural hazards on these assets. The best approach to managing risk may be to focus on a fast response to a hazard event (restoration of services) rather than avoiding or relocating from natural hazard areas. Resource management regulations may simply create uncertainty and administrative burden for infrastructure activities without delivering better outcomes.

In line with this, we request amendments to specific PC120 provisions that create additional consenting costs and delays for infrastructure activities but no additional benefit. The amendments we request are to:

- The definition of “Activities less sensitive to natural hazards”. PC120 currently does not include infrastructure² in any of its three Hazard Sensitivity Ratings, creating uncertainty and potentially the expectation that it should be subject to the most demanding assessment requirements. We request infrastructure (other than social infrastructure)³ be defined as “less sensitive to natural hazards: activities where there is a minimal presence of people and buildings and which will not create public health or pollution issues in a natural hazard event”.
- The natural hazards objectives to make clearer that the Plan will manage the third-party effects of or on infrastructure in natural hazard areas, and NOT protect the infrastructure from consequences of its own activities.
- The standard that some permitted activities⁴ should meet. The required Standard E36.6.1.13 includes many detailed and restrictive bulk and location requirements that seem to have nothing to do with managing hazard risk.
- The classification of some infrastructure activities⁵ as restricted discretionary activities requiring a resource consent, and the accompanying requirements for:
 - An assessment of the functional and/or operational need to locate within the hazard and the benefits of the infrastructure, alongside the risk of adverse effects to other people, property and the environment
 - A hazard risk assessment covering a wide range of matters
 - A landslide risk assessment and a geotechnical report (for activities requiring resource consent in landslide hazard area).

We understand that the provisions, which came into effect with notification of the Plan Change, are already creating disproportionate costs and delays for infrastructure projects (including resilience projects) that would have negligible effect on natural hazards, people or property. Infrastructure providers tell us that the landslide assessment requirements are putting considerable pressure on scarce geotechnical expertise. Our report on *The cost of Consenting infrastructure projects in New Zealand* identified the requirement to seek expert assessment as the main driver of our high and increasing costs of consenting.

PC120 must be consistent with the *National Policy Statement on Infrastructure 2025* gazetted on 18 December 2025, which requires resource management decision-makers to (among other matters):

² We note that PC120 defines “infrastructure” as having the same meaning as in the Resource Management Act 1991 with the addition of gas and petroleum storage, landfills, defence facilities and air quality and meteorological services facilities. Social infrastructure is excluded from this definition, with education, healthcare etc being listed separately in the Hazard Sensitivity Ratings.

³ We support the proposal that education, healthcare etc be defined as “potentially sensitive to natural hazards”, and that where these activities include overnight accommodation they be defined as “sensitive to natural hazards”.

⁴ The operation, maintenance, renewal, repair and minor upgrading of existing infrastructure in natural hazard areas are defined as permitted activities subject to meeting standard E36.6.1.13 (except that transport and underground utilities in flood and coastal hazard zones and transport in landslide susceptibility assessment areas do not have to meet this standard).

⁵ Construction and major upgrades of infrastructure (other than transport and underground utilities in flood and coastal hazard zones; and other than transport in landslide susceptibility assessment areas) must get a restricted discretionary resource consent.

- Recognise that infrastructure may have an operational or functional need to operate, be located in, or traverse particular environments, and that this includes the need to:
 - locate in areas at risk to natural hazards; and
 - manage risks from natural hazards
- Recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity
- Enable the efficient and timely operation and delivery of infrastructure activities, including enabling upgrading where this will improve the resilience of infrastructure to the risks from natural hazards.

Table 1: Decisions requested in submissions.

| Provisions | Position | Reasons | Decisions requested |
|---|----------|--|---------------------|
| <p>Plan-wide provisions</p> <p>Chapter H Residential Zones</p> <ul style="list-style-type: none"> • Broader geographic application of the Terrace Housing and Apartment Buildings (THAB) Zone in walkable catchments around rapid transit and centres • The increased building heights in the THAB zone to 15 storeys around the Mount Eden, Kingsland, and Morningside Stations and 10 storeys around the Baldwin Avenue and Mount Albert Stations. <p>Chapter H Business Zones</p> <ul style="list-style-type: none"> • The increased building heights to 15 storeys around the Mount Eden, Kingsland, and Morningside Stations and 10 storeys around the Baldwin Avenue and Mount Albert Stations. | Support | <ul style="list-style-type: none"> • The greater development around centres and rapid transit enabled by these provisions relative to the previous Plan Change 78 is in line with requirements of the Resource Management (Consenting and Other System Changes) Amendment Act 2025. • Greater enablement of development around rapid transit should materially grow rail and bus patronage, increasing the benefits of significant public investment on rapid transit – especially the \$5.7 billion capital expenditure on the City Rail Link. • Additional development around centres should expand the numbers of people walking to jobs and services there. • Both outcomes should take pressure off the road network from other areas. This would facilitate a future urban form that is more efficient to service with infrastructure. • Redistributing development opportunities to surround rapid transit and centres should also improve the Council's ability to fund its growth-related infrastructure from growth. Our report <i>Paying it back: An analysis of the fiscal returns of public infrastructure investment</i> estimates that only about 45 percent of the "costs of growth" in Auckland have been funded from revenue generated by new residents since 2012. Enabling much more development where there is capacity in existing and new infrastructure can help turn this around. It will increase fare box revenue for rapid transit, as well as development contributions, rates and water rates from the intensifying areas. This would reduce the extent to which such infrastructure needs to be subsidised by people in the rest of the region who don't use it. | Retain as notified |

| Provisions | Position | Reasons | Decisions requested |
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| <p>Plan-wide provisions</p> <p>Chapter H Residential Zones</p> <ul style="list-style-type: none"> The retention of the Single House Zone in significant parts of the walkable catchments around rapid transit and centres Terrace Housing and Apartment Buildings Zone objectives, policies, matters of discretion, assessment criteria and standards to manage effects on amenity (including character, height-in-relation-to-boundary, tower dimension, setbacks and outlook requirements) Terrace Housing and Apartment Buildings Zone objectives, policies, matters of discretion, assessment criteria and standards to manage matters internal to a site (including the size of living areas, internal storage, outdoor living space requirements and internal sunlight access). | Oppose | <ul style="list-style-type: none"> These provisions individually and collectively constrain development around rapid transit and centres and reduce the benefits of Plan Change 120. PC120 retains much of the Single House Zone within the walkable catchments of Kingsland, Mount Eden, Grafton and Parnell rail stations. It also retains much of the Single Housing Residential zoning in Freemans Bay, Herne Bay, Ponsonby and Grey Lynn, which comprise about half of the residential sites within the walkable catchment of the City Centre. PC120 introduces Terrace Housing and Apartment Buildings Zone objectives, policies, matters of discretion, assessment criteria and standards to manage effects on amenity that will likely require site amalgamation for taller buildings. Its provisions to manage internal effects could reduce development feasibility. PC120 retains the Special Character Areas – Residential Overlay as qualifying matter on 11% of land within the walkable catchments of the Kingsland, Mt Eden, Morningside, Baldwin Avenue and Mt Albert train stations, compared to only 2.5% in all other walkable catchments. It also retains the Special Character Areas – Residential Overlay as qualifying matter in the walkable catchment of the City Centre. It retains most of the Business Special Character Areas Qualifying Matter across the town centres within the walkable catchments of the Kingsland, Mt Eden and Parnell stations. The Special Character Areas assessment criteria emphasise keeping things as they are, and don't recognise the imperative of providing for growth in employment and services in these centres. Decisions based on these criteria would likely significantly restrict development below the 6 storey heights of the underlying zoning, preventing town centres | <p>Amend to reduce the extent of constraints on housing and business development capacity around rapid transit and centres. This should be informed by a more rigorous cost benefit analysis which quantifies the impact of the provisions individually and collectively on:</p> <ul style="list-style-type: none"> The foregone residential and business development in centres and around rapid transit The foregone rapid transit ridership to and from these areas as origins and destinations The foregone numbers of people accessing the City Centre via active modes The foregone Development Contributions and fare box revenue that would help fund the rapid transit; and |

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| <p>Chapter D Overlays - Historic Heritage and Special Character</p> <ul style="list-style-type: none"> Special Character Areas – Residential Overlay applied as qualifying matter in the walkable catchments around rapid transit and centres Special Character Areas – Business Overlay applied as qualifying matter in the walkable catchments around rapid transit and centres <p>Chapter D Overlays - Natural Heritage</p> <ul style="list-style-type: none"> Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay applied as a qualifying matter in walkable catchments around rapid transit and centres | | <p>from becoming destinations as well as origins along the City Rail Link to maximise its use.</p> <ul style="list-style-type: none"> The retention of all of the Regional Maunga Viewshafts compounds these constraints especially around the Mt Albert and Mt Eden stations. We note that over time, trees, structures and buildings have obscured parts of some specific Viewshafts, undermining the original rationale for their placement and their associated benefits. Some of these provisions overlay on top of each other. Removing individual constraining provisions while retaining others may not materially affect development capacity and the utilisation of and funding for infrastructure. By constraining development in walkable catchments around rapid transit these provisions will dampen growth in rail and bus patronage and the benefits of significant public investment on rapid transit – especially the \$5.7 billion capital expenditure on the City Rail Link. By constraining development in walkable catchments around centres they will limit growth in the numbers of people walking to jobs and services there. Both outcomes will lead to more pressure on the road network from other areas than would otherwise happen, and a future growth pattern that is more costly to service with infrastructure. They will also constrain the Council’s ability to fund its growth-related infrastructure from growth. Our report Paying it back: An analysis of the fiscal returns of public infrastructure investment estimates that only about 45 percent of the “costs of growth” in Auckland have been funded from revenue generated by new residents since 2012. Constraining development where there is capacity in existing and new infrastructure will also constrain growth in fare box revenue for rapid transit, as well as development contributions, rates and water rates from the intensifying areas. This | <p>therefore the amount that the Council would need to subsidise from region-wide rates revenue</p> <ul style="list-style-type: none"> Using New Zealand Transport Agency’s manual, the additional time/cost of people instead having to travel from other areas to the City Centre and other centres. |

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| | | <p>means such infrastructure will need to be subsidised by people in the rest of the region who don't use it.</p> <ul style="list-style-type: none"> • The Council has not sufficiently justified the provisions, particularly the qualifying matters as required by the Resource Management (Consenting and Other System Changes) Amendment Act 2025. It has not quantified their wider impacts and costs individually and collectively, in reducing development around rapid transit and centres and therefore: <ul style="list-style-type: none"> ○ The foregone rapid transit ridership to and from these areas ○ The foregone numbers of people accessing the City Centre via active modes ○ The foregone funding for rapid transit from this development and the amount that the Council would need to subsidise from region-wide rates revenue ○ The costs associated with development being pushed outside these areas. | |
| <p>Chapter H Residential Zones</p> <ul style="list-style-type: none"> • Mixed Housing Urban Zone applied within walking distance of rapid transit (the future Te Ara Hauāuru – Northwest Busway) | Oppose | <ul style="list-style-type: none"> • The future Te Ara Hauāuru – Northwest Busway is a \$4 billion investment that will provide a 25-minute journey from Brigham Creek to Karanga-a-Hape station, with the capacity to move up to 9,000 people in each direction per hour. PC120 fails to recognise the project is rapid transit as defined under the National Policy Statement on Urban Development. It zones most of the housing within walking distance of the future Northwest Busway as Mixed Housing Urban (which restricts density and heights to three storeys), when the Terrace Housing and Apartment Buildings Zone would provide for greater utilisation of and funding for the busway. | Replace the Mixed Housing Urban zone with the Terrace Housing and Apartment Buildings Zone in areas within walking distance of the future Te Ara Hauāuru – Northwest Busway. |
| <p>Chapter H Residential Zones</p> <ul style="list-style-type: none"> • Combined Wastewater Network Control layer applied as a qualifying matter in walkable | Oppose | <ul style="list-style-type: none"> • The qualifying matter creates uncertainty for developers and would likely have a chilling effect on development (constraining the benefits of and funding for rapid transit). • The Council hasn't provided sufficient evidence about the scale, location, duration or cost to fix constraints in central Auckland's | Amend the geographic application of the Combined Wastewater Network Control qualifying matter or |

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| catchments around rapid transit and centres | | <p>wastewater and stormwater infrastructure, to justify the qualifying matter. Watercare's central interceptor will be completed in 2026 before the Plan Change becomes operative, and Council has control over how fast it can deliver the supporting Western Isthmus Water Quality Improvement programme.</p> <ul style="list-style-type: none"> The qualifying matter may result in unintended consequences, restricting the very growth that could help fund the infrastructure. A City Rail Link report on the CRL precincts public works implementation plan shows that transport, social, stormwater and water costs per household in the Mount Eden Station precinct would fall with increasing density. A resource management regulation may not be the best way to manage infrastructure funding issues (by limiting growth). Watercare already has the power to decline connections, enabling it to control development risks to its network. In addition, Watercare's pricing policies and Council's infrastructure growth charges, development contributions and targeted rates may better align demand for and supply of wastewater and stormwater infrastructure to support growth. | remove it from PC120. This should be informed by a rigorous work to assess whether it is needed, and to quantify its impact on development capacity (and therefore the use of and funding for rapid transit). This work should identify the scale, location, duration and cost to fix constraints in central Auckland's wastewater and stormwater infrastructure to support likely growth around rapid transit and centres as a result of PC120. It should consider the costs of delivering the Western Isthmus Water Quality Improvement programme on a faster timeframe to support this growth. |
| Chapter E Auckland-Wide - Natural Hazards and Flooding | Support in part | <ul style="list-style-type: none"> We support the intention of the PC120 to better respond to the level of risk to human life and property associated with natural hazards. We support the Council spatially identifying hazards and making this information public. We also support new objectives and policies in the urban residential zones to align with the hazards risk framework, and the proposed selective downzoning or application of a qualifying matter overlay as a method to limit | Retain subject to specific amendments to provisions relating to infrastructure and natural hazards as set out below |

| Provisions | Position | Reasons | Decisions requested |
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| | | <p>significant natural hazard risk. The protection of human life and property where risk is significant appears to be an appropriate reason to constrain building height or density requirements.</p> <ul style="list-style-type: none"> • We also support provisions that more clearly enable infrastructure activities with a functional or operational need to locate in a natural hazard area. These include rules that automatically provide infrastructure with permitted activity status: <ul style="list-style-type: none"> ○ the construction, operation, maintenance, renewal and repair of transport and underground utilities in all flood and coastal hazard areas; and of transport in all landslide susceptibility assessment areas ○ activities associated with existing other infrastructure, subject to meeting standards. • These provisions recognise that when it comes to managing natural hazard risk, network infrastructure activities differ from other development or use of land. This infrastructure is often essential and cannot avoid natural hazard areas. The consequences of natural hazards on this infrastructure can generally be categorised as a loss of service, rather than a loss of life or serious damage to property. The infrastructure providers are enduring operators and stewards of their assets, with incentives, legal obligations and the best technical expertise to manage the consequence of natural hazards on these assets. The best approach to managing risk may be to focus on a fast response to a hazard event (restoration of services) rather than avoiding or relocating from natural hazard areas. Resource management regulations may simply create uncertainty and administrative burden for infrastructure activities without delivering better outcomes. | |

| Provisions | Position | Reasons | Decisions requested |
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| <p>Chapter J Definitions</p> <ul style="list-style-type: none"> Activities less sensitive to natural hazards <p>Chapter E Auckland-Wide - Natural Hazards and Flooding</p> <ul style="list-style-type: none"> Objectives Table E36.4.1A Activity table Standard E36.6.1.13 Table E36.4.1C Activity Table E 36.6 Standards E36.8 Assessment – Restricted Discretionary Activities E36.9 Special information requirements | <p>Oppose</p> | <ul style="list-style-type: none"> Specific PC120 provisions create additional consenting costs and delays for infrastructure activities (other than transport) in natural hazard areas, despite these activities having negligible impacts on hazards, people or property. When it comes to managing natural hazard risk, network infrastructure activities differ from other development or use of land. This infrastructure is often essential and cannot avoid natural hazard areas. The consequences of natural hazards on this infrastructure can generally be categorised as a loss of service, rather than a loss of life or serious damage to property. The infrastructure providers are enduring operators and stewards of their assets, with incentives, legal obligations and the best technical expertise to manage the consequence of natural hazards on these assets. The best approach to managing risk may be to focus on a fast response to a hazard event (restoration of services) rather than avoiding or relocating from natural hazard areas. Resource management regulations may simply create uncertainty and administrative burden for infrastructure activities without delivering better outcomes. PC120 currently does not include infrastructure in any of its three definitions of sensitivity to natural hazards, creating uncertainty and potentially the expectation that it should be subject to the most demanding assessment requirements. Given that the consequences associated with infrastructure in a natural hazard event are more about loss of service than loss of life or damage to property, infrastructure should be included in the definition of "Activities less sensitive to natural hazards". PC120 treats the activities of transport, underground utilities, and all other infrastructure in natural hazard areas differently and it is not clear why. | <p>Amend the definition of "Activities less sensitive to natural hazards: activities where there is a minimal presence of people and buildings and which will not create public health or pollution issues in a natural hazard event", to include infrastructure.</p> <p>Amend Chapter E Auckland-Wide -Natural Hazards and Flooding objectives to make clearer that the Plan will manage the third-party effects of or on infrastructure in natural hazard areas, and NOT protect the infrastructure from consequences of its own activities.</p> <p>Amend Chapter E Auckland-Wide -Natural Hazards and Flooding provisions relating to infrastructure to minimise the consenting and assessment requirements of infrastructure located in</p> |

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| | | <ul style="list-style-type: none"> • It defines the operation, maintenance, renewal, repair and minor upgrading of existing infrastructure (except for transport, and except for underground utilities in flood and coastal hazard zones) as permitted activities subject to meeting standard E36.6.1.13. This standard includes many detailed and restrictive bulk and location requirements that seem to have nothing to do with managing hazard risk. • PC120 defines the construction and major upgrades of infrastructure (except for transport, and except for underground utilities in flood and coastal hazard zones) as restricted discretionary activities requiring a resource consent. It requires the benefits of these activities and their functional and operational need to locate in hazard areas to be assessed. It also requires the project applicant to undertake detailed hazard risk assessments and mitigations, particularly in areas of landslide risk. • These provisions, which came into effect with notification of the Plan Change, are already creating disproportionate costs and delays for infrastructure projects (including resilience projects) that would have negligible effect on natural hazards, people or property. The landslide assessment requirements are putting considerable pressure on scarce geotechnical expertise. Our report on The cost of Consenting infrastructure projects in New Zealand identified the requirement to seek expert assessment as the main driver of our high and increasing costs of consenting. • In addition, these PC120 provisions need to be revised to ensure these are consistent with, and give effect to, the National Policy Statement on Infrastructure gazetted on 18 December 2025, which requires resource management decision-makers to (among other matters): | <p>all natural hazards areas where these would have negligible impacts on hazards, people or property.</p> <p>Make any other consequential amendments to the PC120 provisions relating to infrastructure and natural hazards to achieve the relief sought in this submission.</p> |



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| | | <ul style="list-style-type: none"> ○ Recognise that infrastructure may have an operational or functional need to operate, be located in, or traverse particular environments, and that this includes the need to: <ul style="list-style-type: none"> ▪ locate in areas at risk to natural hazards; and ▪ manage risks from natural hazards • Recognise it is the role of the <u>infrastructure provider</u> to identify the preferred location for the infrastructure activity • Enable the efficient and timely operation and delivery of infrastructure activities, including enabling upgrading where this will improve the resilience of infrastructure to the risks from natural hazards. | |