



Submission of Civic Trust Auckland

Submission on a notified proposal for policy statement or plan change or variation Clause 6 of Schedule 1, Resource Management Act 1991, namely, a submission on PC 120: Housing Intensification and Resilience

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The specific provisions that our submission relates to are heritage and character as qualifying matters, including Special Character Areas. We also comment on: timing, zoning, infrastructure, walkable catchments, the natural environment, and issues for particular Auckland suburbs.

We wish to be heard in support of our submission.

We could not gain an advantage in trade competition through this submission.

1. Introduction to CTA

(a) Civic Trust Auckland (CTA) is a non-profit public interest group, formed in 1968, with activities and interests throughout the greater Auckland region.

(b) The aims of the Trust include:

- Protection of natural landforms
- Preservation of heritage, in all its aspects
- Encouragement of good planning for the city and region.

(c) CTA made submissions on various documents through the formation of Auckland Council as a Unitary Authority including submissions on the Auckland Plan and to the Auckland Unitary Plan Independent Hearings Panel. CTA has been designated by Auckland Council as a regional stakeholder.

2. Introduction to PC120

(a) Auckland Council has been required by legislation to notify an Auckland housing planning instrument to:

1. Give effect to policies 3 and 4 of the National Policy Statement on Urban Development (amended May 2022)
2. Amend the Auckland Unitary Plan so at least the same housing capacity that would have been enabled if Plan Change 78 (as notified) was made operative is provided

3. Enable building heights of at least 15 storeys in walkable catchments of the Maungawhau (Mount Eden), Kingsland and Morningside stations and
4. Enable building heights of at least 10 storeys in walkable catchments of the Baldwin Avenue and Mount Albert stations.

(b) Auckland Council notified Plan Change 120 on 3 November 2025 with the period for making a submission on Plan Change 120 being 3 November 2025 to 19 December 2025.

3. Call to Have A Say

(a) At the Auckland Council information workshop on PC 120 on 1 December 2025 that we attended, Ms Simpson the Deputy Mayor stated that Aucklanders have an important say. She said that PC 120 is “not perfect” and that was a view shared by Council planning staff at that workshop. Manager Central Area Planning, John Duguid stressed that Auckland Council “needs to hear from Aucklanders to get the best plan possible.”

(b) What CTA has to say is informed not only by the views of its own members, but also by others with whom we have communicated about the proposed changes, including views we have heard expressed at the range of public meetings organised at short notice in Devonport, Glendowie, St Heliers, Mission Bay, Mt Eden, Remuera, Parnell and St Marys Bay. We have also taken onboard the tenor of social media commentary on the matter.

(c) We have observed that PC120 has created significant uncertainty for residents and a view seems to prevail that the plan does not provide for the well-functioning urban environment that the community is entitled to expect from its unitary plan. There is widespread uncertainty amongst property owners about the effect on the value of their properties, depending on the plans of adjacent owners. There is also the related significant, and apparently unaddressed, matter of what will happen to Auckland Council's rating base in the face of such levels of upzoning.

4. The Latest Plan - PC120

(a) As a Tier 1 City, Auckland Council is being required by central government to implement various initiatives including fast-track legislation to enhance productivity and growth, and to solve the seemingly intractable problems blamed on the RMA. The just-announced replacement of the RMA by the Planning Bill and the Natural Environment Bill will no doubt have ramifications that would have best been understood before PC120 with all its inherent uncertainty proceeded.

(b) In the push to solve ‘the housing problem’, a bi-partisan agreement was reached between Labour and National which resulted in Plan Change 78, which was publicly notified on August 18, 2022. PC78 was a simplistic plan proposing, most notably, the blanket ability to construct three 3-storey units across almost all Auckland residential sections. The Auckland Anniversary Weekend floods in 2023 made obvious the need to review that plan so as to avoid building where there were obvious natural hazards. After considerable debate and negotiating, Auckland was allowed to withdraw its Plan Change 78 and replace it with Plan Change 120, a plan that would allow the desired potential development but avoid locating it in undesirable locations subject to natural hazards.

(c) Auckland Council was required to notify a replacement plan change that would provide no less than the increase in capacity than would have been provided by. PC78 was deemed to deliver just over 2 million dwellings and so intensification under PC120 was to be re-directed to areas around particular transit stations, and within what Auckland Council have suggested are walkable catchments.

5. Timing

(a) CTA considers that PC120 has been introduced under an unnecessary and unrealistic timeframe. Auckland's population is not currently increasing rapidly, and in any case, the Auckland Unitary Plan was an exhaustively consulted-upon plan to give effect to what was the 2012 Auckland Plan's 'high growth forecast' for how the city would grow over the ensuing 30 years. The original AUP 2016 (reviewable 10 yearly) provided for an extra 900,000 homes, and already being 9 years advanced, was due for review next year in 2026.

(b) The development of the NPS-UD made it quite clear which direction Government's expectations around housing were developing, and no doubt Auckland would have tailored the AUP review in 2026 appropriately. Instead, what has happened is that Council has notified a completely new plan, detached from the planning that has gone before and detached from any realistic projections as to feasibility in terms of supporting demand, finance or the ability to provide the necessary infrastructure.

(c) In our view, under the Unitary Plan, Auckland already has enough capacity for higher density housing. While we appreciate that the 2 million figure is not a target for how many homes will be built, our concern is that enabling this exaggerated potential will result in ad hoc development and the potential loss of amenity and character for a great number of homes.

(d) We would ask that if a decision is made to enable 2 million extra dwellings, that the decision be accompanied by an evidence-based explanation of the requirement for the 2 million.

6. Planning approach

(a) PC120 has not been sufficiently nor accurately prepared, fundamental underlying assumptions have not been critically assessed, there has been inadequate consultation, and it is currently not consistent with sound resource management practice and is not consistent with Part 2 of the Resource Management Act 1991 ("RMA"). Further, it does not promote or achieve the sustainable management purpose and principles of the RMA and will not enable people and communities to provide for their social and economic well-being.

(b) We share the view that density done well can deliver a vibrant, liveable, and affordable city. What we seek is a well-thought out, well-consulted, integrated plan for the growth of Auckland, not blanket arbitrary zoning where 2 million dwellings can be placed, but rather, robust planning for essential elements that make up a liveable city.

(c) Auckland builds only around 15,000 homes per year. At this rate, it would take more than 100 years to reach 2 million dwellings, whereas Christchurch is another Tier 1 City and is only subjected to the task of providing growth for a further 30 years.

(d) Fundamental statutory and other planning processes required for sound plan preparation including structure plans and/or spatial plans to guide appropriate development have not been utilised.

(e) Auckland Council has undertaken no population, household growth, or demand feasibility assessment at the suburb level to justify upzoning throughout Auckland. Without this evidence, Council cannot meet its obligations under Section 32 of the RMA or clauses from the National Policy Statement on Urban Development requiring growth projections, demand analysis, and integrated land-use and infrastructure planning.

(f) In CTA's view, Auckland Council has not fulfilled its obligations under the Auckland Unity Plan ("AUP") Chapter B5 Regional Policy Statement to protect historic heritage. In preparing PC120, the Council has not followed fundamental requirements for plan development, including: AUP Chapter B2 – Regional Policy Statement (requiring integrated management and effects assessment); AUP Appendix 1 – Structure Plan Guidelines; RMA s32 – requiring evaluation of alternatives, costs, benefits, and environmental effects.

(g) The Housing Capacity Modelling Report (page 5) says that "This report and the Capacity for Growth model have assessed housing capacity only. However, other aspects of development capacity, such as infrastructure readiness, commercial feasibility, and the likely uptake, are also important and will require further investigation... These broader aspects of development capacity will be addressed as part of Auckland Council's next Housing and Business Development Capacity Assessment (HBA)." CTA is of the opinion that this further investigation should be done now.

(h) CTA is of the view that we should not, of course, enable building in places where development is inappropriate. This includes areas prone to natural hazards. We support this exclusion, but in our view, exclusions should also include qualifying matters such as Special Character Areas, Ecologically Sensitive Areas, important view shafts, and the parts of Auckland that have rich agricultural land.

(i) CTA is of the opinion that the plan should have continued intensifying the growth locations identified in the Unitary Plan, and with the benefit of recent government directives, provide for further intensification around transit locations and within 'walkable catchments'.

(j) Notwithstanding the pressure to provide additional dwellings, CTA remains mindful of the distortion of land banking activities and ghost houses. We are aware there is land banking in Auckland and also that there are many ghost houses (owned by investors who do not intend to live in them), with an increase in their number since the last census. In CTA's view, it does not make good planning sense to keep building houses when many of them stay empty. We support a tax on 'ghost houses', as has been implemented in many countries, including Australia, Canada, France, Ireland, Japan, and the UK.

(k) A possible solution to the difficulty in managing tenancies in 'ghost houses' may be provided by the Housing First programme, which does not seem to be well known across Auckland. We submit that central government and Auckland Council should provide further support to this programme, both in terms of promoting it to potential landlords and funding more support for tenants who enter the programme.

(l) The review of the AUP scheduled for 2026 could have taken its lead from Schedule 3 of the RMA, and added increased density through a proper Unitary Plan process, rather than by introducing Plan Change 120, based on an unrealistic PC78 capacity provision, and then rushing the consultation and process.

7. Support for intensification

(a) CTA continues to support intensification and considers it can be done well, with quality low-medium-rise design, in the right places, backed by infrastructure, and, in many parts of Auckland, this has already occurred.

(b) CTA is aware that Auckland Council has developed a Future Development Strategy (2023-2053) and the data and recommendations in that document could provide useful information as to logical locations for intensification.

(c) CTA submits that to reduce capacity in certain locations, such intensification could be reallocated elsewhere in order to meet the arbitrary 2 million total required by PC120. This might be done by, for example, allowing THAB in some locations or allowing a variation in the number of floors in an apartment block.

(d) CTA supports intensification along genuine arterial routes where transport capacity, wider road corridors, and existing commercial activity make higher-density development more appropriate and sustainable, and better aligned with national policy direction. In special character areas, like, for example, in and around Dominion Road, intensification could occur but there should be appropriate height provisions to provide for a gentle transition between intensified road corridors and adjacent residential sections, and rules should ensure that development does not undermine the values for which the 'special character' was recognised.

(e) We support greater height allowance in the THAB zone, where infrastructure can support the additional loading, with the need for a master plan delivering a stepped approach to the height limits. There is no planning input for gradual height increases. There is the opportunity to master plan the desired higher density in certain THAB zones to be stepped from a ridge at the highest point to lower heights as you progress down the slope. This significantly increases liveability and desirability, and hence demand, while delivering significant increase in density.

8. Infrastructure

(a) In submitting on Council's Future Development Strategy in 2023, CTA agreed with Council that there was fundamentally no need to create further theoretical capacity beyond the 900,000 potential development sites available under the existing provisions of the Unitary Plan, which were intentionally and logically planned for around infrastructure provision, including along transport corridors.

(b) Auckland cannot rely on the current level of infrastructure to sustain the level of intensification envisaged by PC120. PC 120 fails to assess the limitations of the existing 19th century infrastructure to sustain intensification, and does not account for the residential capacity already enabled in the expanded CBD or that which might be provided in Future Development Zones.

PC 120 provides for no planned infrastructure overlay. PC120 Section 32 and the zoning methodology omit stormwater, wastewater, transport, and coastal hazard capacity.

CTA understands that infrastructure has not been considered in the plan in terms of the modelling, the methodology, or for which areas are being upzoned.

(c) The Supplementary Report states at point 30 that “Infrastructure funding remains a critical issue. The council is waiting for stronger and more effective tools to fund growth and infrastructure.” PC120 needs to include planning for infrastructure, in order to support safe, resilient, and sustainable intensification. This includes schools, hospitals, green space, and transport. Growth should be directed to places where the necessary infrastructure is planned, funded, and deliverable.

(d) CTA is not reassured by John Duguid stating at the 12 December workshop that, “Infrastructure upgrades will happen in step with demand.” In our view, it is poor planning to rely on potential legislation and/or private investment for future infrastructure. We know that some parts of the city have been waiting years for appropriate infrastructure and we know that the availability of funding for such work is not increasing. CTA considers that development should not be enabled where infrastructure is not practicably able to be provided. As an aside, the inability to provide infrastructure, should, for reasons of bureaucratic efficiency, be dealt with as a qualifying matter under the Act, even if under 771(j).

9. Zoning

(a) PC 120 makes such vast changes compared to the AUP that it would significantly change the zoning rules for most Auckland properties. These changes could impact almost every street and neighbourhood in the city, over time.

(b) CTA supports high-rise around railway stations, and we support plans to build in sensible places: along main roads, along transport corridors, and in under-utilised industrial areas such as Morningside that could develop into vibrant mixed-use communities.

(c) CTA sees the plan as introducing unnecessary as well as harmful changes to existing zoning, including being destructive of Auckland’s heritage, character, and other amenity values. Zoning a 15-storey tower block too close to a Special Character Area is inappropriate. The dominance of such a building has a potential negative impact on the other dwellings in the neighbourhood, changing to a great extent the nature of a suburb, introducing visual dominance, potentially blocking views and sunlight, and building too close, and intruding on privacy.

(d) CTA doesn’t see that enabling certain desirable places to live, such as the northern slopes of Parnell and St Marys Bay, will meet the housing needs of such people as first-home buyers, those who are currently homeless or new immigrants. Rather it would simply provide additional housing options for those who can already afford these expensive areas. Given the unlikelihood that high-rise development in Parnell and St Marys Bay will contribute in a meaningful way to the underlying for more affordable housing, CTA considers it important to avoid the potential to destroy the character of those areas of the city that are valued not just by the people who live in them (some, for many years) but others who enjoy visiting them, including tourists.

(e) We submit that the rezoning of dwellings in Special Character Areas from Single House to THAB zone and the special height variation control to allow 15-storey apartment buildings (50 metres) would lead to an unacceptable loss of character, unacceptable in terms of the effect on those people currently living in this area as well as the effect on those who do not live in the area but value its character and spend time there.

10. Special Character Areas

(a) CTA supports the appropriate recognition and protection of the historic heritage and special character of Auckland as it is currently protected under the Auckland Unitary Plan. Auckland's SCA's are not just of value to Aucklanders; they are of international significance, being a collection of documented and protected timber architecture from the 19th and 20th centuries unique in the world in terms of scale and quality. The loss of protection for a huge number of properties could lead to the reduction and eventual degradation of those areas through inappropriate development and permanent loss of neighbourhood identity.

(b) SCAs have been protected from demolition for many years and there is now an accepted community expectation that they deserve protection and that their protection will be retained. There is no need to destroy Auckland's Special Character Areas to provide more housing. SCAs cover only 3.6% of land zoned residential in the AUP. That leaves plenty of other land available for intensification. Comparatively large characterless insertions within existing 'special character areas' will have a negative effect on contributing character properties within that area. The economic value of that harm does not appear to have been considered by Council in its section 32 analyses.

(c) In CTA's view, PC 120 fails to adequately provide for the historic heritage and special character of Auckland, which requires protection under s6 & s7 of the RMA. While some of the SCAs may, in fact, merit recognition as historic heritage, for the purpose of PC 120, CTA considers the removal of properties from the Special Character overlay would have an adverse effect on the cohesiveness and values of the SCAs, and the amenity and features of the area which are enjoyed by those who own and/or live in properties within it, and the wider Auckland public and tourists.

(d) Therefore, we object to the Special Character Area overlays being reduced across Auckland, including in some heritage suburbs, reducing the number of properties in the SCAs from about 21,000 to 15,357. We note from Council's own evidence in the Special Character and Pre-1944 Demolition hearings that the number of unassessed character dwellings in the isthmus was estimated to be approximately 63,000.

(e) Some of the areas most affected include Kingsland, Mt Eden, Sandringham, Mt Albert, Freemans Bay, Parnell Remuera and Devonport, in effect, some of Auckland's oldest suburbs, and an integral part of Auckland's history, heritage and character.

(f) Council has not justified the removal of SCA overlays other than through an untested and unreviewed methodology which sought to differentiate individual contributions without due weight being attributed to the SCA as a whole.. The NPS-UD does not require the reduction of Special Character Areas.

(g) CTA supports Jeremy Salmond's opinion (dated 28 November 2022) on the SCA Assessment Criteria, which states that the recognition of identified historic forms and patterns of subdivision, buildings and patterns of streetscape has resulted in the inclusion of those areas as SCAs in the Unitary Plan, and these are required to be protected. He states: "A focus on buildings alone ignores other important urban design matters which are fundamental to an understanding of character, and will result in too few areas being assessed as 'qualifying matters ...' [and] the presence of (an often quite high proportion of) non-qualifying buildings within an SCA does not necessarily diminish the values for which it has been defined."

(h) CTA acknowledges the work done to date by Council's heritage unit that will underpin the IPI process that will ultimately determine the extent of SCAs. We do not accept the robustness of the methodology used in relation to the effective dissection of the SCAs.

(i) Auckland Council's task from Government was not, in the case of Special Character Areas, to verify what it had already identified and might be available for intensification. It was to identify qualifying matters which should exempt those areas from the intensification envisaged under the MDRS and NPS-UD. The MDRS is not progressing, but, in any case, the NPS-UD did not require any particular reduction of SCAs.

(j) The Unitary Plan process identified that there was unidentified heritage and character outside what ended up recognised by the SCA overlays. By Council's own account, according to its own evidence in the Unitary Plan hearings, the extent of that residential 'Special Character Areas' comprised some 84,000 dwellings. CTA is not looking to litigate the likely special character status of those unassessed 63,000 dwellings, but we do object to the reduction of the remainder by a further quarter.

(k) There are ways to build up and out without losing the character of our suburbs. We should be preserving our relatively new built heritage, not getting rid of it.

(l) The Housing Capacity Modelling Report says on page 3 that the housing capacity increase in certain named areas "reflects a clear shift toward greater enablement of intensification in well-connected, high-demand locations." However, some of these high-demand locations are Special Character Areas. While we agree with reducing capacity in less suitable, less accessible, and/or hazard-prone areas, we don't see a problem with increasing housing in lower demand areas.

(m) Given the huge increase in residential capacity proposed by PC 120, the removal of properties from the Special Character overlays will have little effect on the availability of Auckland dwellings, as the properties proposed for removal are less than 1% of that capacity.

(n) In general, people who live in parts of Auckland that still have elements of history and character want to retain these buildings, landscapes, and features.

(o) Now that Auckland Council has greater discretion over where housing capacity is located, this should mean that it is more enabled to consider the parts of the city that need protecting. CTA submits that the Special Character Area overlays remain in place, as they are in the Auckland Unitary Plan. We support the retention of all properties in the SCA overlays and oppose the removal of any of those properties from the overlay. We support the inclusion of those properties in the single house zone and oppose any zoning of them other than as single house zone.

11. Walkable catchments

(a) CTA recognises walkable catchments as an operative planning device for intensifying development, and understands that they are based on relatively short distances. 500-800 metres has been accepted as an international standard as the furthest walking catchment likely to be used in association with a city centre, taking accessibility, gradient and pedestrian safety into account. We observe that within PC 120, Auckland Council has increased this distance to 1200 metres on terrain, which, within these catchments, is by no means flat. In our view, the shorter and comfortably

walkable distances should have been used. In this way, CTA believes that walkability can become habitual, which, surely, is part of the aim, for many reasons.

(b) Further, any walkable catchment needs to be supported by a destination capable of providing some benefit or purpose to the residents.

12. Natural environment

(a) The plan does not constructively deal with the need to achieve attractive and safe streets and the additional services and safe public open spaces that will be generated by excessive intensification.

(b) “Planned built character” in the Residential Objectives and Policies of PC120 suggests that existing character of suburbs can be replaced by a new, more intensive character defined by future development, rather than by the community’s longstanding environment and neighbourhood identity. Residents value certain features of their suburbs and do not want to lose them. These include landscape values such as leafy, green streets, green public spaces (in some places, due to extensive parks and maunga, even a rural feel) and human-scale low-rise housing. Peaceful, attractive environments are valued by residents and contribute to community wellbeing. Satisfied citizens manifest as satisfied constituents which

(c) Higher-density redevelopment typically leads to the removal of mature trees, larger building footprints, and reduced permeable surfaces, which causes a decline in greenery, increased stormwater runoff, and the loss of the spacious, leafy suburban qualities that residents value.

(d) There are no plan controls in PC120 — and very few in the existing Mixed Housing Suburban zone — that protect trees, require permeable surfaces, or prevent full-site clearance, deep gravel layering (200–300 mm), and installation of artificial turf. As a result, both MHS and MHU already enable developments that remove vegetation entirely and replace natural ground with impermeable materials, leaving nothing or very little to be able to grow. Significant loss of mature trees and vegetation, reduces shade, biodiversity, and local character. ...

(e) In the plan, there is no allocation of increase in shared green spaces or master planned and design attractive density. The plan does not constructively deal with the need to achieve attractive and safe streets and the additional services and safe public open spaces that will be generated by excessive intensification. [repetition?]

(f) PC 120 does not allow for sensitive integration between new development and the existing homes, streetscape, or the wider landscape. Good planning should require that new development respects, responds to, and complements established characteristics.

(g) CTA supports provisions that treat notable trees as qualifying matters.

(h) CTA supports the viewshafts from and between the maunga across Auckland being retained, as well as the viewshaft from the museum to the harbour, namely, the Auckland War Memorial Museum Viewshaft..

13. Issues for particular Auckland suburbs

CTA is aware that the issues outlined in this section may well apply to other suburbs across Auckland.

Mission Bay and Kohimarama

(a) Enabling unlimited units per site and up to 4 storeys on the flat in Mission Bay would appear to be a mistake for construction of habitable development, as this is a flood prone area.

(b) Eastridge in Mission Bay zoned as a large local centre enables 6-8 storey development capability through small local streets, which is inappropriate.

(c) Mission Bay and Kohimarama are far away from any town centres, train stations or rapid busways, so do not fit the key criteria for intensification in the NPS-UD. These suburbs already experience frequent flooding on the lower-lying streets and areas, frequent wastewater overflows at Mission Bay and Kohimarama beaches after rain (beaches which are popular for all of Auckland), aging and undersized wastewater and stormwater pipes, coastal inundation and land instability, narrow, constrained transport links constrained by sea, cliffs and unstable land that cannot support significant additional traffic.

Glendowie

(a) In Glendowie, upzoning has not taken into account coastal inundation risk along the estuary edge. MHU zoning has been applied to properties already subject to ponding and overloaded stormwater networks, for example, Roberta Avenue and Crossfield Road. Glendowie has some narrow, winding streets, cul-de-sacs, and single-entry neighbourhoods, for example, Granada Place, Karaka Park Place, Cranbrook Place, Roxy Terrace, and parts of Riddell Road.

(b) Glendowie does not meet key NPS-UD criteria for these reasons:

- It is not within a walkable catchment of a metropolitan or town centre.
- It is not within a rapid transit catchment, and has no rapid transit routes.
- Bus frequency is limited, and the suburb has narrow, constrained local roads not designed for higher-density development.
- The suburb is serviced by a single loop road — Riddell Road — which is the main internal route. There are no arterial roads connecting Glendowie to neighbouring areas.
- Glendowie's infrastructure constraint prevents further intensification:
 - Stormwater catchments are already at full capacity, with flooding occurring across several locations and along stream corridors.
 - Ageing wastewater networks are under pressure, contributing to system overflows.
- Parts of Glendowie face coastal inundation and climate-related hazards.

(c) Glendowie cannot safely or sensibly absorb more density. Residents are already subjected to the consequences of failing networks.

(d) Parts of the suburb are located along the Tāmaki Estuary and the eastern coastline, where sea-level rise, storm surge, and coastal inundation are recognised risks. Additional hard-surface development increases runoff to these sensitive coastal environments, further affecting ecological health and sedimentation.

(e) The proposed Mixed Housing Urban (MHU) zoning across large areas of Glendowie will accelerate the loss of tree canopy, landscaped areas, and permeable

surfaces, fundamentally altering the suburb's environmental character and worsening existing flooding and stormwater issues.

(f) Despite these limitations, there are no funded or planned infrastructure upgrades to support the scale of intensification proposed under PC120. Retaining lower-intensity zoning — remaining at MHS — is essential for this suburb.

St Marys Bay

(a) The dwelling survey for St Marys Bay, as for other suburbs, is inaccurate and should not be used as the basis for planning. It incorrectly focused on individual dwellings and not the spatial context and identifiable areas of Special Character.

(b) The Single House Residential Zone is the appropriate zone for all parts of St Marys Bay where a Special Character Area overlay has been placed. The THAB Zone is inappropriate as the underlying zone for such overlays and should be restricted to sites where redevelopment is not contrary to the purpose of the overlays and where QM infrastructure capacity is available.

(c) The walkable catchment of 1200 metres, which has been drawn from the western edge of the City Centre Zone, does not fit with international planning advice. Jacob's Ladder and the pathway to Point Erin adjacent to the Northern Motorway, cannot be included in walkability assessments due to accessibility and safety issues.

(d) Ponsonby Road and part of Jervois Road should not be classified as a Town Centre for walkable catchment purposes. Like Parnell Road, it is a strip, classified as a City Fringe Centre, as distinct from a Town Centre.

(e) PC120 has mistakenly upzoned areas of St Marys Bay which were not covered by the Operative Special Character Area Overlay. These areas should revert to the operative AUP zones. The current wastewater/stormwater network that serves St Marys Bay is inadequate, and led to the contaminated flooding of around 40 properties during the 2023 Auckland floods. PC120 does not take into account the limitations of the 19th century public road network of this suburb.

(f) The Coastal Context line depicted across St Marys Bay in the Coastal Environment Qualifying Matter s32 report should be the appropriate boundary for the limitation of intensification expansion across St Marys Bay. The Special Character Area Overlay in St Marys Bay under the Operative AUP should be retained.

Parnell

(a) Parnell is Auckland's oldest suburb and includes many historical heritage and special character elements. St Stephens Avenue, for example, is one of Auckland's most iconic streets.

(b) The walkable catchments for Parnell and the distances that they are based on do not reflect actual walkability. Steep topography, busy arterial roads, and safety for pedestrians needs to be taken into account.

(c) The main intensification in this suburb should be around the Parnell train station and the Newmarket train station.

(d) CTA supports the identification of a Coastal Environment Area for Parnell.

14. Supplementary Report

The Supplementary Report reveals shortcomings of PC120 as follows. (Numbering is from the report.)

17. The modelling is a measure of plan enablement, that informs long-term planning. However, it does not: a) consider how the Policy directions of the NPS-UD have been achieved b) assess PC120's consistency with the FDS c) evaluate site feasibility (based on infrastructure readiness, parcel size and certificates of record, consent conditions, geophysical conditions, or hazard risk d) consider health, education, safety and infrastructure investment as pre-cursors to growth e) consider funding and financing/infrastructure investment f) predict actual development take-up.

18. Yield estimates reported by the modelling are limited by the necessary simplifications of complex real-world systems.

20. PC120 is required to give effect to the NPS-UD and the RPS by implementing their objectives and policies. Objective 1 of the NPS-UD states 'New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety, now and into the future.'

21. All the other objectives and policy directions in the NPS-UD cascade from this concept. The core premise is that changes to the urban environment should: a) improve housing affordability b) support competitive land and development markets c) respect qualifying matters d) respond to the diverse and changing needs of people and communities e) enable housing choice that meets the needs of different households; and f) enable urban intensification in areas well served by existing or planned public transport.

22. The concept of 'well-functioning urban environment' should be applied and understood at a refined geographic level having regard to how the city functions, the operation of the land and housing markets, and the implications for people and communities. The RPS was amended through PC80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters (now operative) to expand on the concept and apply it to the following chapters: urban growth and form, natural resources, the coastal environment, qualifying matters, and environmental risk. Objective 2.2.1 provides: "(1A) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety, now and into the future.

(1) A well-functioning urban environment with a quality compact urban form that enables all of the following: (a) A higher-quality urban environment; (b) Greater productivity and economic growth; (c) Better use of existing infrastructure and efficient provision of new infrastructure; (d) Good accessibility for all people, including by improved and more efficient public or active transport; (e) Greater social and cultural vitality; (f) Better maintenance of rural character and rural productivity; (g) Reduced adverse environmental effects; and (h) Improved resilience to the effects of climate change..."

92. Land use policy is a key lever for delivering more housing. While creating more capacity has clear benefits, there are trade-offs, as with all policy options. Some neighbourhoods in good locations will change significantly and intensification will impact existing residents. Modelling helps to understand residential and business

plan-enabled capacity but cannot account for real world factors such as how those opportunities will be taken up by the market, or how quickly intensification may occur.

15. Decisions sought

CTA seeks the following decision by Council:

Accept the proposed plan with amendments as outlined below:

- (a)** Revise PC120 to align with best-practice planning expectations under the AUP and RMA, and undertake a fuller, more accessible consultation process.
- (b)** Retain all properties that are in the Special Character Area overlays in the Auckland Unitary Plan (Operative 2016) within those overlays.
- (c)** Zone all properties in the Special Character Area overlays in the Unitary Plan as single house zone.
- (d)** Retain the lower end of the walkable distance spectrums being sought by the average walker.
- (e)** Impose the qualifying matter for Combined Wastewater/Stormwater infrastructure across all of St Marys Bay, limiting development to that permitted under the Single House Residential Zone or through existing use rights.
- (f)** Impose the Coastal Context line from the QM Coastal Environment s32 report as an AUP constraint preventing intensification.
- (g)** Complete proper stormwater, wastewater, transport, and coastal hazard assessments that show that infrastructure can support higher density before applying upzoning.
- (h)** Undertake a detailed population and housing demand feasibility assessment before applying upzoning.
- (i)** Link intensification to identified and funded infrastructure upgrades in the Long-Term Plan.
- (j)** Remove the term “planned built character” from Residential Objectives and Policies and require new development to integrate with existing neighbourhood character.
- (k)** Introduce new plan controls for both MHS and MHU requiring minimum permeable surface standards and meaningful landscaped areas.
- (l)** Retain the viewshafts from and between the maunga across Auckland, and retain the Auckland War Memorial Museum Viewshaft.
- (m)** Require retention of mature trees where practicable and introduce incentives or rules to protect canopy cover.
- (n)** Prohibit full-site clearance, deep gravel layering, and artificial turf installations that eliminate permeability across entire sites.

- (o)** Avoid upzoning in coastal inundation and erosion-prone locations and apply a Qualifying Matter overlay to manage risk.
- (p)** Correct any inaccurate flood or coastal hazard mapping before applying zoning changes to affected properties. (We understand many owners are submitting details of their properties.)
- (q)** Do not upzone sites adjacent to narrow roads or within cul-de-sacs that cannot safely support additional traffic, parking, or emergency access.
- (r)** Revert to a realistic 30-year “feasible” planning horizon (as used in the AUP and applied to Christchurch’s intensification) to allow appropriate intensification, and prioritise development along rapid transit corridors supported by infrastructure planning.
- (s)** Make use of the data and recommendations in Council’s Future Development Strategy 2023 to 2053.
- (t)** Seek opportunities to accommodate the Housing First programme in intensification initiatives.
- (u)** Change the unlimited number of dwellings per site proposed in the MHU zone to include a maximum dwelling per site limit.
- (v)** Consider betterment charges as part of the upzoning associated with PC 120.

Date of submission: 19 December 2025

Signature:



A handwritten signature in black ink, which appears to read "Audrey van Ryn".

Audrey van Ryn
Secretary, Civic Trust Auckland