

SUBMISSION FROM COCKLE BAY RESIDENTS AND RATEPAYERS ASSOCIATION INC ON PROPOSED PLAN CHANGE 120

Cockle Bay Residents and Ratepayers Association Inc. represents approximately 155 paid-up members or families in Cockle Bay. It has a wider circulation list of about 450 interested parties, and over 760 following us on Facebook. The opinions that follow have been circulated prior to submission to the Panel, and received widespread support. We have included 10 concerns and 1 overarching recommendation in our submission. The sequence to some extent reflects the priorities placed on our proposals. However, a number of issues are inevitably intertwined, and have an equal priority.

1 Zoning – Terrace Housing and Apartments Buildings (THAB) in Cockle Bay.

Rules/Plan Provisions: THAB Zone Cockle Bay / Frequent bus network; wastewater constraints including policy B2.4.2(6); stormwater constraints; Qualifying Matters; Natural Hazards Map PC120

1. The roads zoned for THAB in Cockle Bay include all or part of Granger Road; Litten Roads, Island View Terrace; Cockle Bay Road; Liston Crescent; Coates Road; Evelyn Road; Sandspit Road, Alexander Street; Avoca Road; Trelawn Place; Reydon Place; Lastel Place; Paparoa Road, Bert Wilson Place; Paparoa Road; and Sunnyview Avenue, together with Meadowlands and Millhouse Drives¹.
2. Under the Operative Auckland Unitary Plan what is broadly considered the Cockle Bay area is zoned Single House Zone. Its infrastructure was designed decades ago with this limited capacity in mind. Many houses are connected to soak holes in order to manage stormwater. The zone description in Chapter H.3.1 of the current Auckland Unitary Plan state that:

“The purpose of the Residential – Single House Zone is to maintain and enhance the amenity values of established residential neighbourhoods in a number of locations. The particular amenity values of a neighbourhood may be based on special character informed by the past, spacious sites with some large trees, a coastal setting or other factors such as established neighbourhood character”.

3. It is these characteristics that define the area, and why people are willing to pay a premium to live in the area. This is not NIMBY-ism. It is the amenity and character that people value.
4. It is also why these values translate into higher property prices. However, these prices are then used by Auckland Council as a surrogate for residential desirability, in order to identify areas for intensification. What Council seems to fail to appreciate is that by radically changing the zone description and introducing multistorey apartments they are also destroying the very reason why this area is in high demand. If people wanted to live with such intensification they would choose to live elsewhere, and pay less for their properties.
5. The complaints about in-fill housing where it is permitted are now endless.
6. We question whether the proposed zoning complies with the National Policy Statement on Urban Development 2020 (NPS-UD). This requires development capacity:
 - i) To create a well functioning urban environment². We question whether permitting random high rise apartments along roads that are already overcrowded at school opening and closing peak times, and where there will be insufficient parking, meets this requirement.
 - ii) To be in locations where there is integrated infrastructure planning and funding. Locations are to be infrastructure ready, meaning that there is adequate existing development infrastructure to support the development in the short term³ (within the next 3 years) and, where this does not exist, the required funding is included in the medium

¹ Meadowlands and Millhouse Drives are outside the immediate Cockle Bay area, but contiguous to the THAB zoning

² NPS-UD Objective 1

³ NPS-UD 3.4 (3) (d)

term and long term plans and infrastructure strategy⁴. Infrastructure is to be funded and ready⁵. We question whether the proposal meets these test.

- iii) [the additional infrastructure] in the proposed intensification is likely to be available⁶.
- iv) To reflect the rapid transit requirement of frequent, quick, reliable, high capacity services⁷. The bus service along the Granger/Litten/Sandspit roads fails to meet this requirement.

7. On the “demand” side we have had insufficient time to examine the extent to which Council has completed the required housing demand assessment by location and dwelling type⁸, distinguishing between standalone dwellings and attached dwellings, with demand expressed in terms of the number of dwellings⁹, quantified by short, medium and long term¹⁰, and with an estimate what is feasible and reasonably expected¹¹.

8. We would make the point in terms of the above requirements that we have considerable sympathy with Auckland Council. The time frames, and the targeted number of dwellings, both need to be challenged. It is central government that has failed to reflect the required standards set out in the policy statements. This concern is elaborated on in Section 5 of this document.

9. Our second point of objection is the proposed destruction of local amenity value and standards. Proposed setbacks etc. do not compensate for destroying the intrinsic character of the area. Our other objections below are easier to demonstrate.

10. Our third point is that under Plan Change 78 the area was zoned for a water and/or wastewater qualifying matter. The area does not have sufficient wastewater capacity. A recent (rejected) application for only 70 apartments in Sandspit Road¹² led to a requirement from Watercare for sewage holding tanks for all apartments.

11. In the Plan Change 78 S.32 Report on Water and Wastewater Servicing Constraints¹³ Watercare state that Auckland City has 45,683 properties directly effected¹⁴ by water supply or wastewater constraints. They go on to say that there are “capacity issues in the Howick Interceptor, Bucklands Beach, Mellons Bay Branch and Cockle Bay Branch sewer”. Upgrades are not scheduled until 2037¹⁵. The [potable] “water Howick loop can support additional growth but intensification represents a significant resilience constraint and further intensification represents a greater impact to customer level of service should the performance of the existing infrastructure be compromised”¹⁶.

12. The proposed THAB intensification (and MHS and MHU zoning in Cockle Bay) will not be possible until the sewage network is upgraded. The infrastructure simply does not exist to service the proposed intensification. Watercare have given an assurance that sewage holding tanks will not be used in the future¹⁷. We look to the Panel and Auckland Council to confirm this assurance.

13. Fourthly, lack of supporting infrastructure does not stop with sewage. Many of the single dwellings in the proposed THAB zone are dependent on soak holes for stormwater. Increased coverage of permeable areas will exacerbate stormwater problems and flooding risks. Groundwater infiltration into the sewer system is likely to increase beyond the existing levels, resulting in un-swimmable beaches. The costs of the required infrastructure upgrades, required

⁴ NPS-UD 3.4 (3) e and 3.4.(3) (f)

⁵ NPS-UD Objective 6; clauses 3.25 (1) c and 3.4 (3)

⁶ NPS-UD 3.5

⁷ NPS-UD Policy 3.c.(i)

⁸ NPS-UD 3.24 (1)

⁹ NPD-UD 3.24 (3) and (4)

¹⁰ NPS-UD 3.25

¹¹ NPS-UD 3.26

¹² The so-called Quarterdeck Fast Track application for apartments at 30 – 40 Sandspit Road

¹³ PC78 S.32 and Section 77J and 77L Water and Wastewater Servicing Constraints

¹⁴ Ibid page 4

¹⁵ Ibid page 41

¹⁶ Ibid page 41

¹⁷ Watercare email from A. Deutschie, Head of Wastewater Planning to Ms R Francois 19 November 2025

to service potential but unproven demand, will be significant. We have touched on this in more detail in Section 4 of this submission.

14. Fifthly, we assume that Council staff have not looked at their hazard maps carefully enough. The arcgis maps clearly show that the area proposed for THAB bounded by Litten Road, Evelyn Road and Bert Wilson Place is a high risk area for land susceptibility, as shown in Figure 1. Council needs to reconsider the proposed zoning in the light of the updated Natural Hazards rulings.
15. The Auckland Landslide Susceptibility Study of May 2025 states that "Auckland has a lot of soil creep but this has been excluded from the study because it is usually shallow and slow, and can be controlled with normal engineering". The Cockle Bay area as a whole demonstrates soil creep, and surface slumping. Numerous small springs occur along the ridgeline at times of high rainfall, many of which do not appear on the Plan Change 120 Flood Plains overlay or on Geomaps. Our concern is that permitting high level THAB dwellings will reduce permeable areas and exacerbate the risks of slumping and of stream erosion – a problem that is already evident in a number of locations.

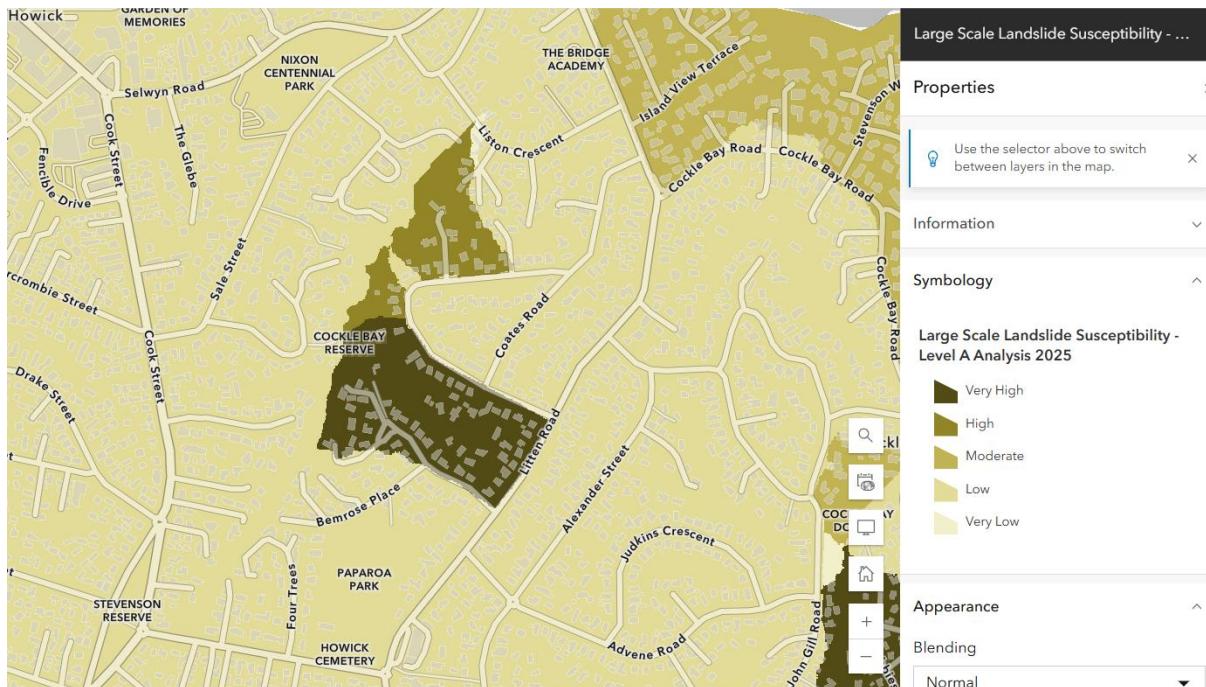


Figure 1 Landslip Susceptibility Litten Road¹⁸

16. These concerns are elaborated on in Section 8 of this submission.
17. Sixthly, we believe that THAB will significantly exacerbate traffic problems and introduce impossible demands for parking. We must assume that Council staff are not familiar with the roads identified, especially at school opening and closing times. Traffic congestion is endemic. The roads are often effectively reduced to a single line - one-way only. Buses for Howick college must park some considerable distance away in Somerville Road, and wait to be called up to collect pupils. Parking for parents is always an issue, with many parents arriving 30 - 60 minutes ahead of pick up time. The situation will become much worse with lack of sufficient garage parking for the proposed THAB dwellings. Council simply needs to look at the government statistics for car ownership per dwelling in the area to realize the scale of on-road parking that will occur under the proposal. Expecting people to cycle or walk (or even use not-frequent public transport) is to live in a world of delusion.

¹⁸ Source: <https://www.arcgis.com/home/item.html?id=0d83cc4836f04620b77c31e802114288>

18. Next, we must point out that the local schools are at, close to, or beyond, capacity. The headmaster of at least one of the schools has spoken against the proposed intensification.
19. Our eighth point is that Council appears to have made no provision for additional green space for active and passive enjoyment by the increased population. This surely infringes the principles of a “liveable city”.
20. Finally, we believe that the proposed THAB zoning is contrary to proposed policies for ridgeline protection.
21. We question whether it is ethical or misrepresentation to propose a zoning which cannot then be implemented in the area because of infrastructure capacity constraints.
22. We suggest that in the absence of sufficient infrastructure capacity it is equivalent to misrepresentation to re-zone much of Cockle Bay for intensification until adequate infrastructure is available. In order to provide developers with some certainty that assists in their planning, they should be given a time line when infrastructure upgrades will be completed.
23. **Relief Sought:** Based on all of the above, we submit that:
 - i) The proposed THAB zoning in the Cockle Bay area is not fit for purpose. It should be removed and revert to Single House Zone, or, at worst, Mixed Housing Suburban. Section 6 of this submission proposes alternative locations for intensification.
 - ii) Increases in infrastructure capacity should be completed before the zoning becomes operative. This will ensure compliance with the NPS-UD. Until then, both wastewater and stormwater should be included as qualifying matters because the infrastructure does not currently have sufficient capacity to service the areas. This will alert prospective developers to the fact that any zoning other than replacement of one dwelling by another single dwelling cannot be accommodated because of multiple infrastructure constraints. Until the infrastructure constraint is removed by the completion of capital works sufficient to service all prospective properties in the zone, no proposed constructions should be permitted.
 - iii) Council reaffirms the policy that there will be no sewage holding tanks for new developments in the Cockle Bay area, thus removing the risk of overflows, and operating error if control of holding tanks is left to inexperienced body corporates, and worse still, slippage of sewer tanks occurs in areas of soil instability
 - iv) Land identified as having high risks of landslides be removed from the proposed zoning, and annotated in the LIM.
24. The benefits from these proposed changes are that Council can better plan its infrastructure investment program in an affordable manner; that it will not need to introduce third world infrastructure such as sewage holding tanks; that it avoids intense development in areas where there is an identified hazard risk; and that in the short to medium term it retains the amenity value of this part of Auckland City.

2 Zoning - Mixed Housing Suburban Zone (MHS) – Cockle Bay

Rules/Plan Provisions: Zoning: MHS Cockle Bay; Wastewater Constraints including policy B2.4.2(6);; Stormwater Constraints; Qualifying Matters; Natural Hazards

Map: PC120 Cockle Bay

25. A substantial number of our objections to the proposed MHS zoning are similar to those for the THAB zone. In particular:
 - i) The area was previously considered subject to the water/wastewater constraint. The proposed MHS zoning effectively triples the network capacity if 3 dwellings are permitted without a resource consent. Even though this number is unlikely to be reached in practice, the NPS-UD requires the area to be infrastructure ready.
 - ii) What we would describe as the intrinsic character of the area, which is what people value, will be sacrificed to intensification.

- iii) Stormwater infrastructure constraints also apply.
- iv) Part of the area has had significant flooding in the past. A number of properties are shown as being on flood plains. Although the severity of potential flooding is known, the risks do not appear to be reflected in the zoning designations. Figure 2 below highlights the potential high flooding risk areas. Figure 3 shows the number of streams in the area. As discussed later in this submission many streams and springs are not shown as they appear intermittently when rainfall and the water table are high.

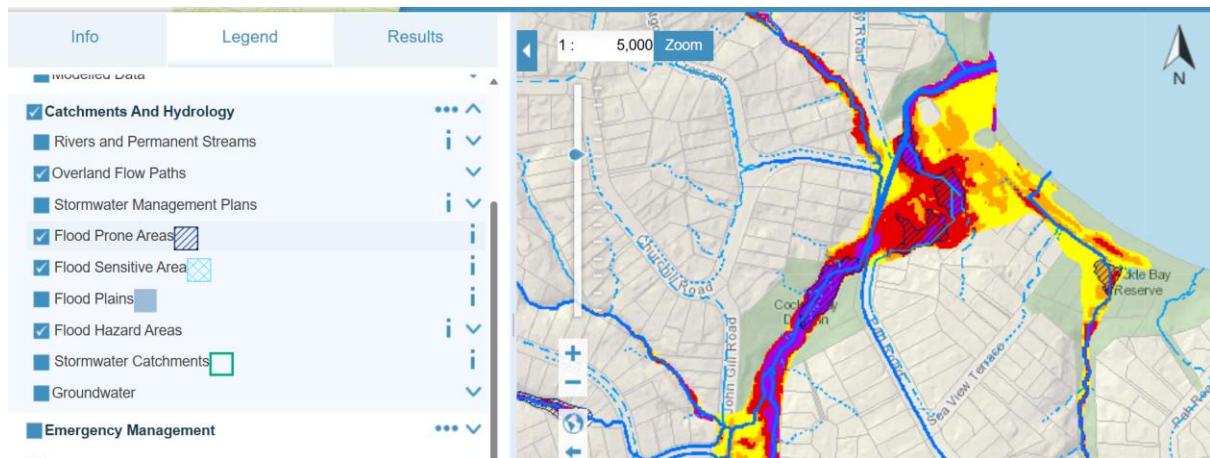


Figure 2 Natural Hazards - Flooding¹⁹

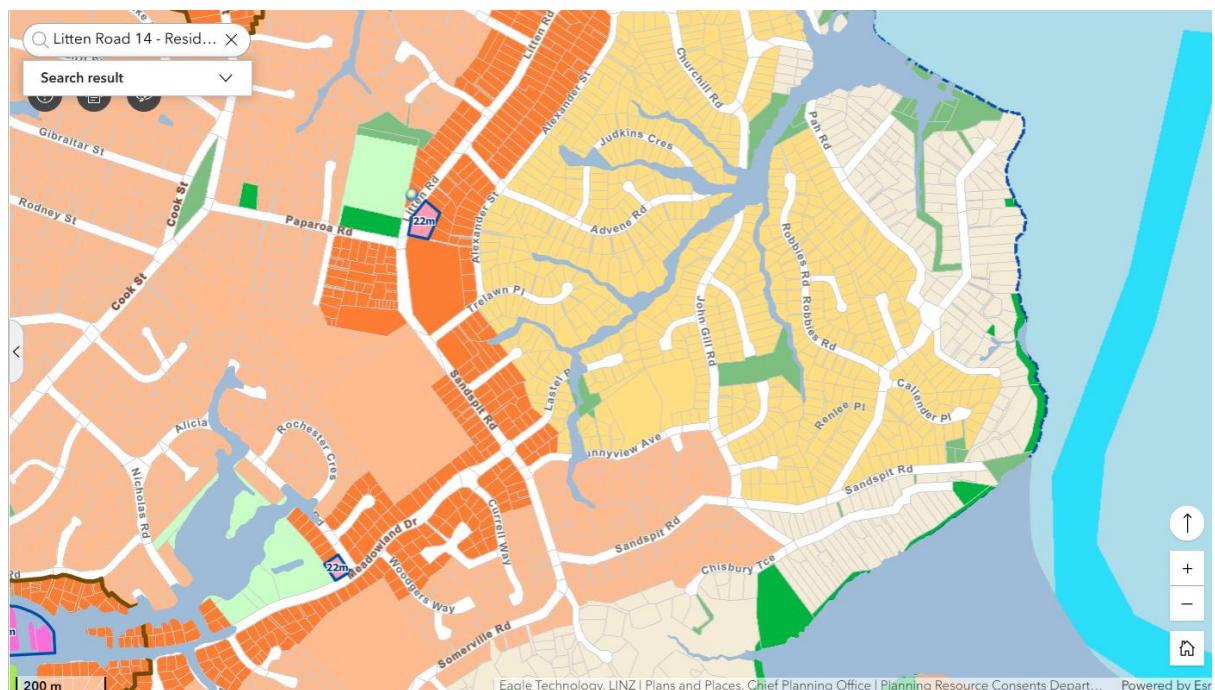


Figure 3 Local Streams Identified by Council

- v) The landslide susceptibility maps in Figure 4 below, show the area very approximately from Cockle Bay domain down to Sandspit Road, and bordered approximately in the west by John Gill Road, and in the east by Pounamu Place, as a high risk area. We question the wisdom of zoning this for any intensification.

¹⁹ Source: <https://geomapspublic.aucklandcouncil.govt.nz/viewer/index.html>



Figure 2 Landslide Susceptibility MHS²⁰

- vi) As with the THAB zoning, the local streets simply do not have the capacity for extensive on-street parking to be expected if three dwellings are constructed on a site where there was previously only 1 house – which would have had adequate off-road parking.
- vii) Local schools will not have the capacity for increased enrolments.
- viii) There is no additional green space for active and passive recreation.

26. We seriously question whether the zoning is appropriate, or has simply been made to achieve a growth target.

27. **Relief Sought:** We request that:

- i) Both wastewater and stormwater are identified as qualifying matters, thus placing limitations on the potential for development.
- ii) The current SHZ status is retained, and is offset by higher levels of intensification elsewhere, where there is sufficient infrastructure capacity.
- iii) If point "ii" above is not possible, and despite the fact that the plan revisions propose allowing approval without for a resource consent for compliant developments in the MHS and MHU zones, we request the Panel to direct Auckland Council to refuse all developments that cannot be immediately connected to (i) the wastewater network, without the need for sewage holding tanks or increased risks of sewage overflows; (ii) the stormwater network, after making provision for stormwater holding tanks; (iii) the potable water supply network if similar supply constraints emerge in the future.
- iv) Land identified as having high risks of landslides and flooding be removed from the proposed zoning, and annotated in the LIM, including an indication or risk severity.

28. The benefits from these proposals are identical to those listed for removal of the THAB zoning.

3 Zoning - Mixed Housing Urban (MHU) – Cockle Bay

Rules/Plan Provisions: Zoning: MHU Cockle Bay; Wastewater Constraints including policy B2.4.2(6);; Stormwater Constraints; Qualifying Matters; Natural Hazards

Map: PC120 Cockle Bay

²⁰ Source: <https://www.arcgis.com/apps/mapviewer/index.html?layers=0d83cc4836f04620b77c31e802114288>

- 29. Similar arguments and recommendations apply to this zoning as those presented in Section 2 of this submission.
- 30. **Relief Sought and Benefits:** The relief sought and benefits from the proposal match those for the MHS zone.

4 Infrastructure Availability and Costs

Rules/Plan Provisions: Infrastructure costs

Map: Plan Change 120 overall

- 31. As mentioned in paragraph 10, under proposed Plan Change 78 the Cockle Bay area was subject to a qualifying matter for water and wastewater. A proposed non-compliant block of 70 apartments was required by Watercare to provide sewage holding tanks in order to overcome the capacity constraint.
- 32. The sewage network throughout Cockle Bay dates back for decades, and would have been designed for single houses only.
- 33. Nevertheless, Plan Change 120 proposes to:
 - i) replace what was single house zone with THAB dwellings along Litten and Sandspit Roads and some adjacent roads;
 - ii) replace the majority of the former SHZ with Mixed Housing Urban or Mixed Housing Suburban zoning.
- 34. This effectively is at least a trebling of the potential demand for a sewage network. It will greatly exceed design capacity. In addition, as mentioned in paragraphs 13, 25 (iv) and Section 8 of this submission, additional infrastructure will be required to provide the necessary stormwater infrastructure.
- 35. Watercare have given an assurance that sewage holding tanks will not be a future requirement. They state: "Watercare no longer supports wastewater tankering or storage with off-peak discharge as interim solutions for developments in areas where infrastructure is unavailable, limited, or still being developed. Accordingly, there are no wastewater detention tanks approved or proposed within the Cockle Bay/Howick area for new housing developments"²¹.
- 36. City growth on the scale specified by government will require a wide range of additional infrastructure, extending well beyond wastewater networks. For instance, we have identified infrastructure requirements not only for local wastewater networks but also bulk sewage networks; sewage treatment; dams and water storage; potable water distribution, including for firefighting; landfill; additional transport equipment, and Council provided community services such as libraries; swimming pools, sports fields and passive recreation spaces. Plus, of course, associated debt servicing. Auckland Council have confirmed that none of the associated costs (or offsetting revenue from rates and developer contributions) or associated cash flows and cost benefits had been considered at the time of our enquiry²². No revisions have been made to the Annual Plan 2025 /26 or the Long Term Plan 2024 – 2034.
- 37. This does not constitute prudent financial management for the city or ratepayers. Central government's decision to require up-zoning is effectively forcing Council into an unsustainable financial position.
- 38. Similarly, central government has made no costings or cost estimates for essential government funded infrastructure such as schools, hospitals and medical facilities, prisons, or private sector public good services such as power supplies and telecommunications²³. Given the probable random nature of intensification spread across the city as a whole, based on potential developer

²¹ Watercare email from A. Deutschle, Head of Wastewater Planning to Ms R Francois 19 November 2025

²² Auckland Council letter 16 October 2026 from Ms J Kearney to CBRRA OIA 8140017276

²³ Ministry of Environment letter 22 October 2025 (responding because the Minister of Finance had no information)

profits, this means that government will always be reacting to demand, rather than proactively planning for the provision of essential services.

39. We submit that it is not acceptable to say that “the Plan Change is a planning tool only” nor that it is good enough to say that despite the proposed zoning developments will require “engineering approval via a separate process” and that this “will not be granted unless there is sufficient capacity”²⁴. To use the old euphemism this is talking with forked tongue. If it is known in advance that “engineering approval” will not be granted because of insufficient infrastructure capacity then the area should not be zoned for intensification.
40. We also note that some areas of the city, such as Flat Bush, which have been developed in relatively recent periods, still lack essential infrastructure and community facilities. It is not good enough to say these will follow in the future, and be funded by developer contributions. A liveable city requires them in advance of development.

41. **Relief Sought:**

- i) The Panel recommend to Council that Council request central government to agree to a phased, targeted, time-bound intensification plan, as outlined in Section 11 of this submission.
- ii) The Panel recommend to Council that Council request central government to provide sufficient time before finalizing revised zonings to complete a full financial projection of infrastructure costs and affordability, together with a comprehensive cost benefit analysis, to be incorporated into updated short and medium term financial projection and infrastructure plans.

5 Proposed Target for Additional Dwellings

Rules/Plan Provisions: Other; Housing Capacity Modelling; NPS-UD; infrastructure costs
Map: Plan Change 120 overall

42. We understand that the figure of 2 million homes was based on the level of intensification that would have occurred under the “one size fits all” Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The Act, supported by both Labour and National Parties, required Councils’ to amend planning rules to allow for 3 dwellings without resource consent throughout many residential areas. This proposed intensification generated the potential number of new dwellings (2 million) which was then incorporated as a benchmark minimum into the latest “intensification legislation”. It is disingenuous for central government to claim this is a local decision. In effect it is the number mandated by central government, but without any evidence-based long term population projections.
43. We submit that the figure is flawed and needs to be challenged by Council. Estimates suggest that it will be the turn of the century before this requirement is reached. The target also places Council in the position of failing to comply with requirements in the NPS-UD, as well as facing an unaffordable financial burden in terms of immediate infrastructure investments.
44. Not only is the benchmark flawed but it ignores the requirement for evidence-based decision making, (Sub part 3 of NPS-UD) including evidence based monitoring of the supply and demand for housing. The latest legislation effectively overrules the quite rational requirements of the NPS-UD.²⁵ The Policy Statement requires a quantified demand and supply assessment broken down by stand-alone and attached dwellings²⁶. The plan-enabled supply must be infrastructure-ready²⁷ meaning that in the short term there is adequate existing infrastructure to support development, or, for the medium term, there is funding for developments.²⁸ We submit that these conditions have not been met for the Cockle Bay area.

²⁴ Email message from unitaryplan@aucklandcouncil.govt.nz to John Reynolds 19 November 2025 para 4

²⁵ NPS-UD 3.9 and 3.10

²⁶ NPS-UD 3.24

²⁷ NPS-UD 3.25 (1) (b)

²⁸ NPS-UD 3.4 (3) d and e.

45. Furthermore, national policies require any lesser capacity to be assessed in terms of costs and the broader impact of changes²⁹. As stated elsewhere, neither central government nor Auckland Council have included any costings when specifying the requirement for intensification or the practical infrastructure needs and associated costs.

46. We do not blame Council for this. Rather it is central government that has approached the issue from a supply side only, without considering the short term realities of infrastructure availability and the costs of providing the required infrastructure in a non-targeted manner across the city as whole, in all areas where infrastructure capacity is insufficient to meet projected long term supply (intensification) requirements.

47. For all of the reasons in the following paragraph we suggest that the intensification target requirement resembles the phrase of being “a solution in search of a problem”.

48. We believe the Panel is in a position to recommend that Auckland Councillors approach central government in order to stress that:

- i) There is no rational requirement to plan for intensification through to 2175 – 2225. It is almost impossible to think of any organization that plans this far ahead.
- ii) The existing Auckland Unitary Plan (AUP) has adequate capacity for the medium term.
- iii) Statistics New Zealand suggests that the 30 year demand for residential housing is 360,000 dwellings
- iv) Based on current projections, over the next 30 years only 15% - 17% of total enabled plan capacity will be required³⁰.
- v) There is therefore no need to plan for 6 times the level of demand over the next 30 years.
- vi) We agree with the government’s statement that actual intensification will occur progressively. However, infrastructure upgrades cannot occur progressively. They must have adequate capacity to service all potential properties within the proposed zoning. This will require immediate capital expenditure in order to upgrade capacity. It will impose an enormous burden on ratepayers since the costs will precede any developer contributions.
- vii) Auckland Council’s financial planning and capital investment plans will need to reflect this growth framework. To provide infrastructure-ready capacity to service untargeted intensification across the whole of Auckland city is likely to be unaffordable.
- viii) Auckland Council will also need to incorporate the necessary social infrastructure (parks and reserves; dams and potable water storage; swimming pools and libraries etc. into its plans, in order to create a liveable city.
- ix) Adopting a more incremental approach will better enable (i) Auckland Council to plan and fund local infrastructure, while at the same time (ii) central government can also plan its own major infrastructure investments in infrastructure such as schools, hospitals and medical facilities based on demand (prioritized locations). Both parties will know where future growth is targeted to occur, rather than locations being driven by developers having a choice across the city as a whole. This does not mean that growth targets are removed.
- x) In order to develop an appropriate plan, Council also requires an indication from central government on locations for additional space for schools, hospitals and medical facilities and any other central government provided infrastructure. It is not good enough to say this will reflect demand. The current nature of all-embracing intensification targets from central government mean that the location of demand cannot be predicted.

49. **Relief Sought:** In view of all the above points, but still in the spirit of meeting the legislative requirement for 2 million homes, the Minister for RMA Reform and Housing should update his very generalized Statement of Expectations by stating that he will accept that he will accept a phased, targeted, time bound, costed, intensification plan that incorporates the central government target but does so in an affordable manner that reflects the availability of infrastructure. This reflects the Minister’s statement dated 19 September stating in paragraph 4

²⁹ Schedule 3C.8 and S32 RMA 1991 Economy Matters Evaluation Report

³⁰ Ibid

that “Council can once again decide how **AND WHEN** growth happens”³¹ (Our capitalization, italics and bold).

50. The benefits of this proposal is that Council will be placed in a position where it can manage its future investments in infrastructure in a professional, accountable and responsible manner, and that it will not be forced into unaffordable debt.

6 Intensification along major transport corridors

Rules/Plan Provisions: Zoning; Intensification; Frequent Transit Bus Network;
Map: PC120 Howick/Pakuranga

51. We support intensification along high volume, high frequency transportation corridors. The proposed THAB zoning in Cockle Bay does not meet this definition. If the central government-imposed need to provide for 2 million dwellings is to be met (and we dispute that this number is evidence-based) and the Cockle Bay THAB, MHS and MHU zones are removed or reduced, it then becomes necessary to identify alternative locations for additional capacity. This is covered in the following paragraphs.

52. Relief Sought:

- i) Botany bus station has not yet been “designated” and is therefore zoned for only 6 storeys³² (22 metres) - the same as the total of only 8 neighbourhood shops at Litten Road! The Botany bus station should be designated immediately, thus justifying a height limits of at least 10 storeys, as already applied to Pakuranga and other bus stations along the Eastern busway.
- ii) Pakuranga Town Centre is currently zoned for 10 storeys³³. This could be increased to 15 storeys, (50 metres) thus reducing demand for intensification in some other residential areas. (Botany Town Centre would have a similar height limit).
- iii) Similarly, the height limits at Edgewater (Te Taha Wai), Burswood (Pohatu) and Gossamer (Koata) (and Botany) should all be increased to 15 storeys because of their locations on a rapid transport route.
- iv) Ferry services have not been included by central government in their requirements³⁴. However, we should point out that the ferry from Pine Harbour into the city takes about 35 minutes. The public transport journey from or to Howick at peak times is closer to 1.5 hours. Consideration should be given to re-zoning walkable catchments around ferry terminals such as the one at Pine Harbour where the journey time compares favourably with bus transport.

53. The benefits of these suggested changes are that they reduce the need to intensify in other suburban areas, thus enabling them to retain their existing character and amenity value. It will also reduce the need for immediate major and costly infrastructure upgrades which will otherwise be required to service this intensification.

7 Howick-Specific Concerns

a) Howick Village

Rules/Plan Provisions: RMA Schedule 3c 8(1)(b) and standards; Chapter D
Map: Plan Change 120 – Howick area

54. We support the retention of the height limits in the Howick Village³⁵, which we still believe deserves the title of village, despite attempts to upgrade it in order to justify further future changes.

³¹ Hon. Chris Bishop Minister for RMA Reform 19 September Further detail on Auckland plan change, forwarded by Mikaela Bossley Clark

³² Information Sheet 5, page 5

³³ Ibid

³⁴ Information Sheet 4 Walkable Catchments page 4

³⁵ Howick Village centre itself has height limits ranging from 7 to 13 metres, so retains its character. The THAB zone borders this, and provides for housing of 6 storeys or more.

55. **Relief Sought:** The Panel recommends to Council that the height restrictions in the Howick Village are confirmed.

b) Viewshafts from Stockade Hill

Rules/Plan Provisions: S 32 and RMA Schedule 3c Stockade Hill Viewshaft Overlay
Map: Plan Change 120 – Howick area and overlay

56. Stockade Hill currently has a protected viewshaft, providing for views over the Hauraki Gulf and islands. The visual integrity of the viewshaft is an important part of the heritage of the area, and a welcome sight as travelers emerge over the brow of the Ridge Road hill and approach the village. Any wider application of the THAB zoning or intrusion into the area designated for the viewshaft would adversely effect the values managed by this overlay. The proposed Plan Change provides for its retention, but we wish to be sure this proposal is implemented.

57. **Relief Sought:** We also strongly support the retention of the viewshaft from Stockade Hill, and request that the Panel recommend to Auckland Council that the viewshaft be retained.

c) Viewshafts from The Glebe

58. This viewshaft is from the junction of The Glebe and Selwyn Road, on the corner of All Saints Anglican church. Together with the Stockade Hill viewshaft, it forms part of the character and amenity of the early Howick Village and the images early settlers would have had. Together, they were described in a report on Plan Change 78 commissioned by Auckland Council from Ms. M. Absolum, a qualified landscape architect, as reflecting the relationship of Howick to the inner gulf islands, and being a valuable local view³⁶.

59. The viewshaft from The Glebe had been retained in the Plan Change 78 proposal. It has now been sacrificed in the name of intensification. We call for its reinstatement. It is an integral part of the vista surrounding Howick as a whole, and more specifically the historic All Saints Church, and its more modern replacement. It is part of “what Howick is”. It is part of the irreplaceable heritage of the area. Council cannot let its desire to identify areas for high rise developments to sacrifice so much of the character and things that citizens – who are also ratepayers – value.

60. **Relief Sought:** The Panel recommends to Auckland Council that the viewshaft from The Glebe be reinstated on the grounds that it provides an important visual connection and value linking the historical origins of Howick into the benefits of its location in the 21st century.

61. The benefit of each of the above proposals is that Auckland Council is recognizing, valuing and preserving local heritage characteristics that help define the history of the area and the very things that people enjoy about living in the area. The loss of these features in the name of intensification will be an indictment on the forethought of decision makers.

8 Constraints on construction in flood plains³⁷

Rules/Plan Provisions: Natural Hazards (Information Sheet 8); stormwater; qualifying matters
Map: PC120 Cockle Bay area; Geomaps Catchments and Hydrology Flood Hazard Areas

62. We support restrictions on construction in flood plains and the associated risk assessment. (However, we have failed so far in our initial attempts to see this translated into specific risk assessments within the flood prone areas close to Cockle Bay beach).

63. Although Council states that flood plains and overland flow paths will be maintained³⁸ and that the SHZ will be used for residential properties exposed to the highest levels of flooding and coastal hazards, our examination of the maps suggests that much more intense zoning has been applied in a number of areas identified as flood plains. This is illustrated in Figures 2 and 3 provided earlier in this submission.

³⁶ Preliminary Report to Independent Hearing Panel on behalf of Melean Jill Absolum – Landscape Evidence of Local Public Views Overlay 19 February 2024

³⁷ Technical information has been provided by a qualified water engineer Mr Yuva Adhikary

³⁸ Information Sheet 8

64. We accept the broad risk classification of “significant, potentially tolerable and acceptable”³⁹, but we have been unable to see how this has been translated in practice into specific locations within our local area of interest. This includes locations at high risk of flooding and of continued stream erosion.

65. Whilst supporting the principles of the new risk-based approach, we are concerned about the detail. In particular:

- i) As mentioned earlier, a number of properties in the proposed THAB zone rely on soak holes for stormwater management, raising concerns about future infrastructure capacity
- ii) The stormwater network in Cockle Bay was constructed in the 1960s and 1970s. Climate change and atmospheric rivers were not concerns at that time.
- iii) Since the update of Council’s Design Standards in July 2025 the new design standards have increased by 28% for a 10% Annual Exceedance Probability (AEP) and 95% for a 1% AEP compared to earlier standards. Stormwater infrastructure is no longer appropriate for currently perceived risks, let alone the proposed level of intensification.
- iv) The Code of Practice now requires a 17% increase in 24 hour design rainfall depth for a 2.1° centigrade temperature increase and a 32.7% increase for a temperature rise of 3.8° centigrade.
- v) Floodplains have expanded by up to 30%; ponding depths have risen by as much as 500mm and flow velocities by 40%.
- vi) The proposed zonings will substantially increase impervious surfaces and run off volumes, exacerbating flood depths and flow volumes, and requiring significant capacity increases.
- vii) Because of changed standards the stormwater pipes and overland flow paths are under-capacity for proposed developments.
- viii) There is no evidence that these risks have been taken into consideration when setting THAB, MHS and MHU zoning in Cockle Bay.
- ix) We believe that the new approach will create insurance cover problems for both existing and new property owners in at risk areas.

66. **Relief Sought:** Before any re-zoning is adopted Council upgrades the stormwater infrastructure to the latest AEP standards, if necessary further increasing the baseline to reflect current climate change predictions

67. The benefits from this approach are that Council is upgrading areas and reducing risk in areas which fail to meet current design standards, but doing so in an planned and affordable manner.

9 Compliance with New Zealand Coastal Policy Statements

Rules/Plan Provisions: Chapter H Zones; S.32 Coastal Environment Evaluation Report; Information Sheet 15 Coastal Environment as a Qualifying Matter
Map: Plan Change 120

68. The Cockle Bay catchment drains directly down to the sea, including direct discharges from streams in the area. The New Zealand Coastal Policy Statement 2010 (NZPCS) therefore has a particularly strong relevance, and must be considered as part of the required plan changes. As a national policy, it is required to be incorporated into the planning proposals.

69. Of particular relevance in the NZCPS are: objectives 2, 5, and 6, and policies 3, 4, 6, 7, 22, 23, 25, 27 and 28, together with the need for baselines to measure outcomes.

70. Chapter H of PC120 specifies that up to 3 dwellings may be developed as of right in both MHS and MHU zones, subject to compliance with the required standards. Despite consent being available as of right, nowhere in that Chapter can we find any reference to the NZPCS, even though it is a qualifying matter (QM), as is the Hauraki Gulf Marine Park Act 2020 (s 771d).

³⁹ Chapter E36 page 2

71. Although it can be argued that the procedures in place will ensure that full consideration will be given to NZPCS, we question whether this will work in practice. For instance, Information Sheet 15⁴⁰ refers to an earlier broad rollout of Height Variation Controls, and its failure to take into account the local context, such as the sensitive local environment. It seems to us that there is a risk of history repeating itself. If no consent is required there is a danger that compliance with other national standards will become overlooked or waived as not being material.
72. When reviewing the spatially identified QM on the planning map it is hard to identify the geographic extent to which this QM is applicable. Two small properties on Beach Road and Granger Road do appear. There is also information on coastal erosion and coastal inundation. Apart from that, as amateur observers, we have been unable to find more specific information on risk levels allocated to individual properties.
73. **Relief Sought:** Although the proposed Chapter H makes references to coastal yard protection, it omits any reference to NZPCS. We request that the operative version be required to incorporate a reference to the applicability of the NZCPS for each applicable zoning.
74. The benefit will be the avoidance of any ambiguity or omission, similar to the problems described in Information Sheet 15 in paragraph 71 above.

10 Bus Routes targeted for intensification

Rules/Plan Provisions: Walkable Catchments
Map: Plan Change 120 – Howick area

75. Our understanding is that the THAB zone around Howick and the Litten Road/Sandspit Road corridor has been based on⁴¹:
 - v) Residential land demand
 - vi) “access score”
 - vii) Walkable catchments of 1.2 km in 15 minutes
 - viii) the number and hierarchy of centres along the corridor (neighbourhood, local, town and metropolitan – with Howick identified as a town centre)
 - ix) strategic connections
 - x) bus frequency
76. Our first point is that land demand is a consequence of the intrinsic amenity values of the area, not the availability of public transport. High rise apartment blocks will destroy the very thing that people are prepared to pay a premium for. It cannot be used as a surrogate for determining demand in the long term – although we agree that early developers will be able to capitalize - and profit from - the benefits of the location, which will be progressively eroded as more 6 storey tower blocks appear. It is perhaps a paradox that in using high price land as a determinant for housing demand the Council is also favouring those least likely to use public transport (those with higher disposable incomes) whilst at the same time using the public transport network to justify apartment blocks.
77. Our second point is that despite the criteria described in paragraph 75 we find it hard to understand the logic of how the intensification criteria have been applied in practice. The proposed THAB zoning for Litten and Sandspit Roads is effectively “two sections deep” and includes properties on parallel feeder roads. It services one small shopping centre –a butcher, a baker; a fishmonger; a takeaway; a hairdresser, a corner dairy, a “dollar shop” and a small Thai restaurant. This presumably qualifies as a “neighbourhood” centre. But, in contrast, there is a lower level of proposed intensification along Ridge Road between the much larger Howick and Highland Park shopping areas, and along parts of Pakuranga Road towards the Pakuranga shopping plaza. This appears to be an inconsistency.

⁴⁰ Information Sheet 15 Coastal Environment Qualifying Matter

⁴¹ Email from unitaryplan@aucklandcouncil.govt.nz to jpreynolds 19 Nov 2025, referring to pages 448 – 459 of the 547 page S 32 Evaluation Report on NPS-UD dated October 2025.

78. Our third point is that a bus service at 15 minute frequency (at peak times) does not reflect our definition of a rapid transport network. We are sure that regular commuters will agree with these sentiments – and most likely comment on the number of largely empty buses. This reflects the myth that people are prepared to walk a fairly brisk 1.2 km, often uphill, in order to reach a bus route.
79. The scoring allocated when considering the factors determining bus routes is somewhat sensitive. We are mindful of the comments from Council staff that the proposed route along Litten and Sandspit Roads was almost at the bottom of the threshold used to identify applicable routes for the THAB zoning. It must, therefore, be considered a marginal option for intensification.
80. **Relief Sought:** On the assumption that planning for a population several decades before the target numbers will be reached, we call for a more equitable application of the screening criteria that have been used.

11 Overall Conclusion

81. We submit that the Panel should advocate that Auckland Council indicate to the Minister that:

“Central government’s ambitious aspiration of planning for an additional 2 million dwellings can be met by providing a phased, targeted, time-bound, fully costed, intensification plan that commences with intensification around existing rapid transport corridors where there is sufficient infrastructure capacity. It then expands intensification to areas where there is also sufficient infrastructure capacity to service the current population. During this time, remaining areas where there is insufficient infrastructure can be targeted for upgrades in a phased, affordable, manner based on a capital investment plan that reflects affordability and a realistic population projection”.
82. This approach has the benefits of:
 - i) Reflecting the Minister’s statement that he requires an indication of “how and when growth happens”⁴²
 - ii) Enabling Council to better direct its investments in infrastructure to areas where they will produce the greatest benefits.
 - iii) Allow Council to develop a targeted, phased, affordable plan long term plan for increasing infrastructure capacity to service growth.
 - iv) Allowing sufficient time to develop a sustainable infrastructure investment plan.
 - v) Enabling central government to target investment in central government funded infrastructure, such as schools, hospitals and medical facilities in areas where population growth, and therefore demand for services, is most likely to occur.
 - vi) Providing 3rd party public good infrastructure providers, such as power and internet suppliers, with a clearly identified priority areas for future investments, in order to maximise their return on investments.
83. For all the reasons given above this is preferable to Plan Change 120

⁴² Hon. Chris Bishop Minister for RMA Reform 19 September Further detail on Auckland plan change, forwarded by Mikaela Bossley Clark