Property Council New Zealand

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Submission on Plan Change 120: Housing Intensification and Resilience

19 December 2025

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Auckland Council
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Submission on Plan Change 120: Housing Intensification and Resilience

1. Summary

1.1. Property Council New Zealand ("Property Council") welcomes the opportunity to submit on Plan Change 120: Housing Intensification and Resilience ("PC120") to Auckland Council.

1.2. Property Council supports various aspects of PC120, including the broad intensification of Auckland across walkable catchments, town centres and metropolitan areas. More density across the city will lead to greater housing affordability, better urban development, and higher productivity, supporting growth in existing and new communities through meaningful engagement.

1.3. However, we have concerns about some aspects of PC120. As it stands currently, PC120 lacks clarity and detail about how various proposed provisions will be implemented, especially those related to specific urban design requirements, and natural hazard overlays.

1.4. With targeted adjustments, we believe that PC120 can successfully enable more housing in the right places, strengthen resilience, and support the development of vibrant, well-functioning communities across Auckland.

2. Recommendations

2.1. Property Council seeks the following recommendations to PC120:

- Adopt a more targeted and evidence-based approach to minimum height thresholds that enables new development in the right places rather than simply increasing theoretical capacity in low-demand areas;
- Ensure methodologies for height standards be based on accessibility, rather than arbitrary amenity matters such as transitions between zones;
- Publish an updated housing capacity estimate net of qualifying matters and natural hazard constraints;
- Upzone Local Centres to 400 metres – from 200 metres – and to explore extending the 400-metre catchment to more Town Centres;
- Revise the multi-criteria analysis to remove double-counting of centres, improve how accessibility to adjacent centres is assessed, and apply a clear scoring threshold;
- Upzone any Frequent Transit Network ("FTN") corridors that achieve an overall multi-criteria analysis score of six or greater, not just the selected 24 corridors in the FTN;

- Streamline zoning and height standards to ensure consistent application within planned transition frameworks, particularly along key corridors;
- Introduce distinct assessment pathways for apartments and terrace housing within the Terrace Housing and Apartment Buildings ("THAB") zone or clearly differentiate the applicable rules and criteria for each typology;
- Remove any policy or assessment direction that effectively requires slender towers over podiums as the default apartment form;
- Review upper-level setbacks in conjunction with Height in Relation to Boundary rules and replace the current approach with a more flexible, outcome-focused framework;
- Change matters of discretion from a binding regulation to a broad guideline;
- Ensure outcome focused standards can be achieved through a prescriptive criterion;
- Replace subjective and undefined qualitative phrases with clear outcomes and measurable performance criteria;
- Amend PC120 to abide by the new Planning Bill when it passes into law and that urban design provisions are framed in a clear, proportionate, and outcomes-based manner;
- Ensure building heights of apartments have the specific dimensions 4 and 4.5 metres, other floors at 3.25 metres, and roofs between 1 and 2 metres across Town Centre, Local Centre and Mixed-Use zones;
- Exclude screened lift overruns, roof-top plant and building services from roof height allowances, particularly in Town Centre and Mixed-Use zones;
- Review required setbacks in conjunction with HIRB rules;
- Reduce the mandatory 20 metre setback for required outlook space, or change it to a discretionary and assessment-based matter;
- Revert to measuring outlook space from the habitable room window, not the balcony edge;
- Removing all provisions on amended landscaping area rules and revert to the old rules;
- Remove all provisions on amended outlook;
- Allow more flexibility for the 20% glazing rule so it does not apply to pedestrian access and internal access;
- Remove all provisions on deep soil and tree canopy rules;
- Align urban design standards across zones so that comparable building types are assessed consistently;

- Remove the mandatory communal open space requirement for apartments and allowing provision to be determined by market demand and site context;
- Clarify rules so that open space provided as part of a larger development counts for the whole site;
- Separate the assessment criteria for terrace housing and apartments or provide an apartment-specific pathway;
- Examine whether PC120 reduces the supply of industrial or light industrial land and assess the economic and employment implications;
- Apply the risk-based approach through the resource consent process when there is complete information on natural hazards, not at the plan-making stage;
- Strengthen provisions that enable timely technical assessment, early identification of issues, and meaningful engagement with affected landowners;
- Streamline the restricted discretionary consent process, especially for sites with potential flood risk, so developers can understand exactly when they must undergo a specific site assessment;
- Provide permitted or streamlined pathways where natural hazards have been resolved through completed earthworks or confirmed technical certification;
- Update and verify all natural hazard maps, publish the datasets and assumptions, and improve the usability of GeoMaps for hazard identification;
- Separate risk classification from hazard mapping and require that mitigation, land modification, and adaptive responses be considered before assigning risk categories or restricting development;
- Identify the types of projects and sites for which resource consents require site-specific assessments;
- Replace blanket downzoning based on regional-scale and outdated hazard datasets with a risk-proportionate framework that relies on site-specific hazard assessments for partial or low-risk hazards, and enables engineering or design mitigation;
- Provide explicit guidance on resource consent management with clearer definitions for natural hazard areas, and specific evidence requirements;
- Enable redevelopment of hazard-exposed land where risk can be reduced to tolerable or acceptable levels through engineering or adaptive measures;
- Provide full transparency on methodologies, thresholds, and underlying datasets associated with natural hazards;
- Adopt a more balanced approach to natural hazards that combine risk identification with clear, workable mitigation pathways, supported by both private investment and proactive Auckland Council infrastructure management;

- Specify climate and hazard scenarios clearly in plan provisions, apply them proportionately, and ensure alignment with national and international best practices; and
- Revert to the Auckland Unitary Plan approach for natural hazards.

3. Introduction

3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive."

3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, to contribute to the overall prosperity and well-being of New Zealand.

3.3. Property is Auckland's largest industry. There are around $997.8 billion in property assets across Auckland, with property providing a direct contribution to GDP of $13 billion and employment for 87,080 Auckland residents.[1]

3.4. Property Council is the collective voice of the property industry. We connect property professionals and represent the interests of 449 Auckland based member companies across the private, public and charitable sectors.

3.5. Property Council's submission provides feedback on PC120. Comments and recommendations are provided on issues relevant to Property Council's members. Property Council also intends to present an oral submission and may expand on, clarify, or refine our recommendations through the hearing process.

4. General comments

4.1. Property Council is in favour of several elements of PC120, particularly the broad intensification of Auckland within walkable catchments, town centres, and metropolitan areas of the city. Further intensification will enhance housing affordability, improve urban development, and boost productivity. We also understand the reasons for opting out of PC78. Adapting the planning system to climate resilience is essential, especially considering recent flooding across the region.

4.2. Property Council's previous submission on Plan Change 78: Intensification ("PC78") supported the broad objectives of urban intensification. We endorsed Auckland Council's approach to enabling greater upzoning, reducing urban sprawl, improving transport efficiency, and meeting Auckland's urgent housing and growth demands. We also advocated for several elements of the PC78 to undergo further refinements and

[1] Property Council, *New Zealand Property Industry Impact Report 2024*, https://www.propertynz.co.nz/wp-content/uploads/2024/09/PCNZ-Property-Industry-Impact-Report-2024.pdf

changes to specific regulations, such as rules on THAB zones, infrastructure sequencing, and walkable catchments. We have been consistent in our advocacy for robust, effective, and consistent rules for property development.

4.3. Property Council is concerned that parts of PC120 are unclear. Specifically, rules on natural hazards and urban design are difficult to interpret, and their impact on development processes and housing outcomes is uncertain.

4.4. The notified set of rules, especially for natural hazards and urban design, lacks clear guidance and transparent assessment thresholds. Revising these provisions is essential to provide actionable decision-making frameworks and clarify real-world impacts. The sector needs predictable, clear rules for development decisions.

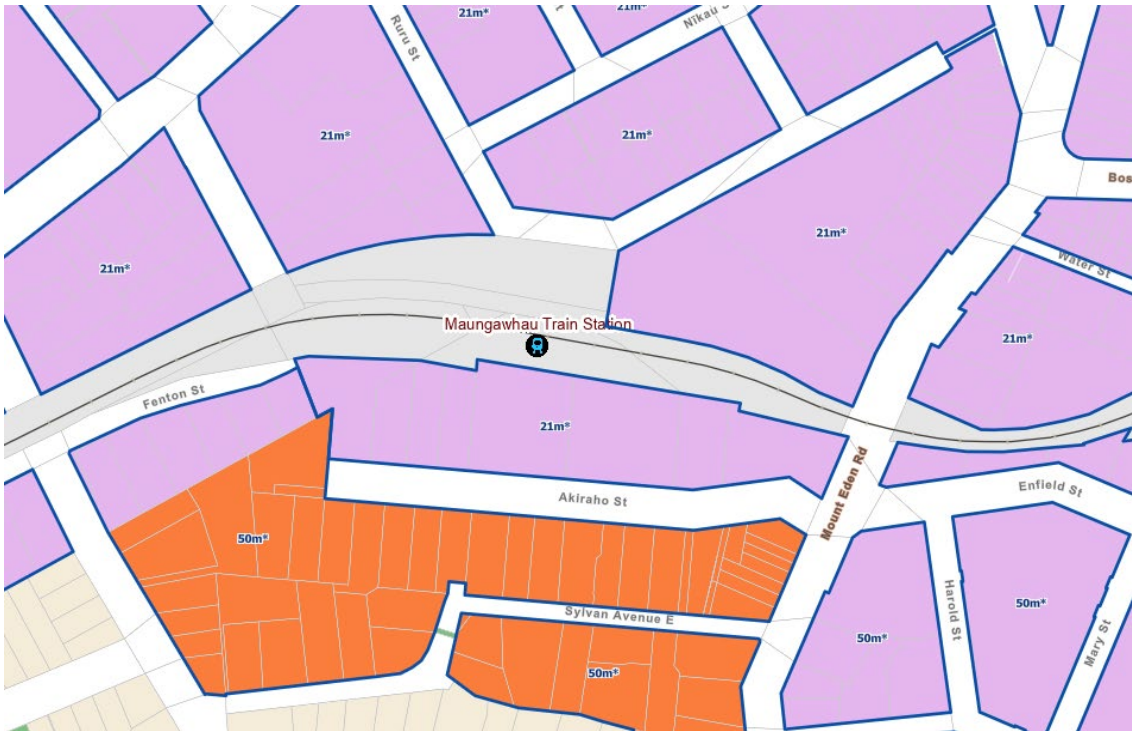
5. Proposed approach to housing intensification

Minimum height thresholds standards within walkable catchments

5.1. We broadly support intensification in PC120 but are concerned by the lack of clear logic in how the 10- and 15- storey height bands are distributed. Some small-town centres are categorised as 15- storeys, while several metropolitan centres with greater transit access are downzoned to lower heights. Consistency across walkable catchments through refinement on individual areas would provide more certainty.

5.2. For example, as shown in Figure 1, the same area near Maungawhau Train Station has some areas with mixed-use zones at 6- storeys near the main road, others at 15- storeys, and some at single-house zones within the same transit corridors.

Figure 1: Plan Change 120 map viewer – Maungawhau Train Station.



5.3. Although PC120 enables substantial height in walkable catchments, inconsistencies in how height is applied across walkable catchments can materially affect development feasibility and yield. Without a transparent and standardised methodology, similar sites can produce different development outcomes, reduce investment confidence and make the system overly complex. We broadly prefer more standardised planning that encourages density through transparent methodologies. Zoning changes alone do not guarantee development.

5.4. It is important that intensification is aligned with both economic realities and the funding that makes development viable. Infrastructure funding and sequencing should be used to support and unlock development in areas identified for growth. We support planned and committed infrastructure investment, which will increase development certainty, improve feasibility, and help ensure that the capacity enabled by PC120 translates into actual housing development.

5.5. Auckland Council should set height thresholds based on clear, measurable factors, such as station usage, infrastructure funding, travel-time benefits, project economic viability, and the market's ability to absorb new development. We recommend using a more targeted, evidence-driven approach to minimum height thresholds that enables new development in the right places rather than simply increasing theoretical capacity in low-demand areas.

5.6. Auckland Council applied its own methodology in developing the proposed height standards, but this is not clear in Section 32 or the zone provisions. The policies of the affected zones should explicitly reference and give effect to this methodology. We recommend that the methodology for height standards be based on accessibility and not arbitrary amenity matters such as transitions between zones. Setting out this methodology clearly in the policies would provide a framework for future resource consent applications.

5.7. PC120's enabling of 6-, 10-, and 15- storey heights within walkable catchments and centres are moderated by qualifying matters. Members are concerned about the feasibility of realising the housing capacity figures modelled at 2 million dwellings when qualifying matters are considered. We recommend Auckland Council to publish an updated housing capacity estimate net of qualifying matters and natural hazard constraints.

Proposed intensification around Town, Local and Neighbourhood Centres

5.8. Building on PC78, Auckland Council's PC120 proposes to expand the modified THAB zoning to areas surrounding Neighbourhood Centres, extending 200 metres around larger Local Centres and 400 metres around larger Town Centres. We recognise the strategic reasoning behind selecting the 57 centres for adjacent intensification, and we support applying the 400-metre zone to large Town Centres.

5.9. Restricting intensification to the 57 centres limits housing supply in areas with good access to amenities, services, and public transport outside Auckland Council's boundaries. Even across some of the 57 centres identified, the THAB zoning is not consistent across Town Centres. Across various Town Centre areas in Auckland, some sites are zoned for 15- storeys, while others are zoned for medium density or single housing zone, despite there being no overlays or methodology to justify this.

5.10. We are also sceptical of the 200-metre catchment for Local Centres, even across areas not on Frequent Transit Networks areas. Many Local Centres still have the scale, services, transit options, and amenities to support higher density.

5.11. For example, the Eastern Bays from Okahu Bay to St Heliers should have higher upzoning. The rationale behind the different categorisation between Local Centres and Town Centres is inconsistent.

5.12. Extending the catchment for Local Centres to 400 metres is suitable, where it is supported by accessibility and amenity. This would better support the goals in the National Policy Statement on Urban Development of increasing housing near small-scale amenities.

5.13. There should be some flexibility in the criteria and assessment for height and density infringements. For example, if there is land suitable for terrace housing but just outside the 400 zone by 10 metres, there should be exemptions to allow high-density development in that area, given the development's context.

5.14. We recommend Auckland Council to upzone Local Centres to 400 metres – from 200 metres – and to explore extending the 400-metre catchment to more Town Centres across the city.

Proposed intensification around Frequent Transit Network (FTN) routes

5.15. Property Council supports an amenity and transit-focused intensification strategy. We support prioritising rapid transit stations and FTN routes as the main hubs for growth. Adopting a city-wide network approach strengthens alignment with Auckland's goals for a dense, transit-friendly, and adaptable urban environment.

5.16. Intensification should be supported around amenity-rich areas, including town centres, employment hubs, and key service locations. Planning should account for varied travel patterns and lifestyle choices across all local precincts. All residents do not always commute to the city centre.

5.17. Despite the intent to create FTN Corridor Intensification Areas, there are notable issues with how these areas have been identified based on the 2031 Frequent Transit Network.[2] Out of 69 corridors evaluated, only 24 were chosen. While the Section 32

[2] As included in the Regional Public Transport Plan 2023-2031.

Evaluation Report indicates that a multi-criteria analysis ("MCA") was undertaken, including factors such as access scores and residential land demand, it fails to clarify the rationale for the exclusion of the remaining corridors, nor how thresholds were applied to determine which corridors were considered "best suitable for intensification." [3]

5.18. For example, the MCA appears to double count the presence of existing centres along corridors, inflating scores for routes with relatively low public transport service levels, while undervaluing corridors with strong existing bus frequency and patronage.

5.19. We recommend revising the MCA to remove double counting of centres, improve how accessibility to adjacent centres is assessed, and apply a clear scoring threshold.

5.20. We recommend any FTN corridors achieving an overall MCA score of six or greater to be upzoned for inclusion as Corridor Intensification Areas, not just the selected 24 corridors in the FTN.

Density and height distribution queries in the Mixed Housing Urban and Suburban zones

5.21. The Mixed Housing Urban zone allows for development up to approximately three storeys, while the Mixed Housing Suburban zone generally enables development up to two storeys. Both zones allow up to three dwellings as a permitted activity. We welcome both zoning thresholds to increase housing capacity and choice across Auckland's neighbourhoods, covering most of the area zoned across the city.

5.22. However, there are inconsistencies between different land areas across suburban zones. For example, Figure 3 displays Arthur Street where one end of the road is zoned Mixed Housing Urban, while further down the same road is zoned Mixed Housing Suburban or Single House.

5.23. Zoning differences across a street may be appropriate and intentional when they support focused intensification, create clear transitions, or protect the outlook and amenity of higher-density developments. Our main concern is zoning inconsistencies on the same side of a street or within a single development area.

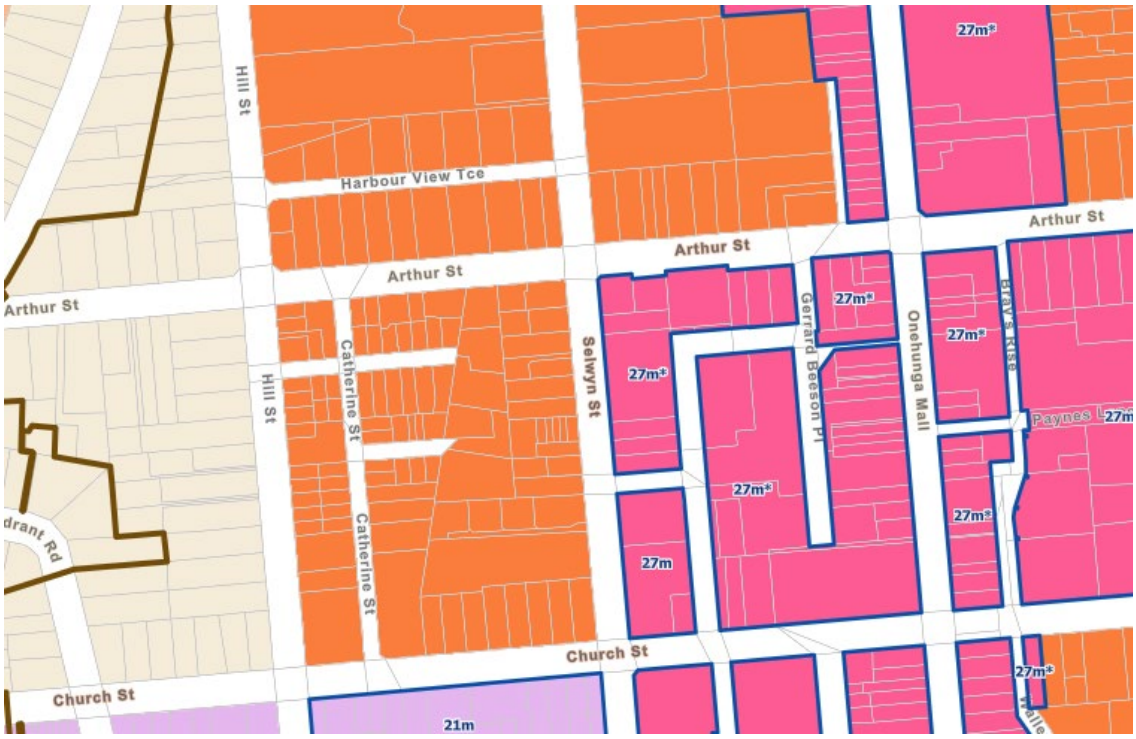
5.24. Applying different zones in these cases without a clear planning rationale creates uncertainty for landowners and developers and hinders efficient development.

5.25. Auckland's former zoning framework provided a gradual transition in density, so that high rise Business town centre zones – as in Figure 3 – were generally surrounded by THAB and slowly transitioned into Mixed Housing Urban or Suburban, and then to Single House zones.

[3] Auckland Council, *Proposed Plan Change 120 – Housing Intensification and Resilience (PC120) to the Auckland Unitary Plan (Operative in part) Section 32: Evaluation Report* (2025), https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/unitary/pc-120/72-pc120-s32-policy-3.pdf, 13

5.26. This approach supports density and urban centres by creating communities where people can live, work, play and shop. Under PC120, the graduated structure has weakened or disappeared in some areas, leading to inconsistent zoning across adjacent sites. Clear reform is needed to ensure lower-density zoning is applied strategically as part of a planned transition, rather than inconsistently within single developments.

Figure 3: Plan Change 120 map viewer – Arthur Street



5.27. Inconsistent zoning across similar sites creates practical challenges for landowners, developers, and planning practitioners by increasing uncertainty about development expectations and consent processes. This also places additional pressure on Auckland Council planners to interpret intent on a case-by-case basis, leading to inconsistent assessments and outcomes. For the effective implementation of PC120, zoning patterns should be clear, coherent, and grounded in a well-defined strategic narrative reflected in the plan provisions and supporting documents.

5.28. We recommend that Auckland Council streamline zoning and height standards to ensure consistent application within planned transition frameworks, particularly along key corridors where achieving intended density depends on site aggregation.

6. Terrace housing and apartment building ("THAB") zone

6.1. Property Council has reservations about the uncertainty of how the new urban design requirements on THAB zones will operate in practice. While clear guidance is essential, the proposed provisions for THAB zones provide both prescriptive controls with subjective criteria. This may lead to inconsistent interpretation among planners, especially as expectations of "quality" change over time.

6.2. We support objective, prescriptive standards for quantifiable matters such as building height, setbacks, building envelopes, and minimum internal layout requirements. Objective standards offer certainty and support early feasibility assessments. However, when assessing design quality, discretion should be limited, constrained, and focused on outcomes, with clear performance criteria that allow for multiple solutions.

6.3. The Government's "Going for Housing Growth" Pillar 1 objectives include provisions that "prohibit councils from setting minimum floor area and balcony requirements."[4] The objectives of Pillar 1 were to remove unnecessary planning barriers and increase the supply of new housing. Although PC120 frees up more developable land, we have reservations about whether the THAB provisions in PC120 unintentionally create additional barriers to development.

6.4. Property Council is concerned that the current zoning definition for THAB is flawed. Two different development types are consolidated into a single zone. Apartment developments usually include corporate bodies with strata-style governance arrangements, whereas terraced housing tends to be 2-3 storey townhouses without distinct governance arrangements and with simpler property rights across different owners of areas developed through subdivision.

6.5. Apartment developments and terraced housing differ not only in-built form, but also in ownership structure, governance, and subdivision outcomes, which affect how planning rules are applied and interpreted. This requires clear definitions of what constitutes an apartment development versus terrace housing, so that each can be assessed against criteria that reflect their respective development characteristics.

6.6. We recommend that Auckland Council either introduce distinct typology-specific assessment pathways for apartments and terrace housing within the THAB zone or clearly differentiate the applicable rules and criteria for each typology.

6.7. Several assessment criteria seem tailored to townhouse outcomes and may not suit apartment typologies. This could lead to apartment designs that mimic townhouse expectations, resulting in inefficient layouts and weaker built outcomes. At a minimum, Council should clarify which criteria apply to apartments and provide worked examples to ensure consistent interpretation.

6.8. We recommend that Council separate assessment criteria for terrace housing and apartments or provide an apartment-specific pathway. The criteria should address apartment-specific features such as podium parking, building services, lift cores, and common circulation.

[4] Ministry of Housing and Urban Development, *Going for Housing Growth: Discussion Paper* (2025), https://www.hud.govt.nz/assets/Uploads/Documents/Going-for-Housing-Growth/Discussion-document/GfHG-Phase-3-discussion-document.pdf, 7

6.9. We have concerns about consistency across multiple zones. Other zones (such as Mixed Housing Urban) do not carry the same burdens as THAB zones. THAB is a transitional zone by design. The policy intent is that these areas will change over time as Auckland grows "up" rather than "out". Although policies on THAB zones are also supposed to encourage higher building across streets, they impose onerous requirements including large setbacks, upper-level recessions, and outlook separations. Many of the requirements are not appropriate for all sites, disproportionately affecting smaller and irregularly developed areas.

6.10. We are concerned that the THAB provisions implicitly favour a particular built form – slender towers above podiums. THAB should enable multiple workable typologies so the market can deliver quality outcomes across different site conditions. Current rules will have major consequences for the feasibility of more intensive development. THAB zones should allow multiple design methods, not a single preferred prescriptive form. We recommend removing any policy or assessment direction that effectively requires slender towers over podiums as the default apartment form.

6.11. We have issues with the following requirements for building forms for THAB zones:

New building set back at upper floors

6.12. Upper-floor setback requirements are generally effective within walkable catchments. Outside these areas, the main constraint is the interaction with Height in Relation to Boundary (HIRB) controls. The stepped HIRB plane, starting at approximately 21.5 metres, often limits the building envelope more than the upper-level setback itself and significantly affects development capacity.

6.13. Mandatory upper-level setbacks combined with HIRB significantly limit viable floor area for mid-rise apartments, disadvantaging early projects and reducing usable space within permitted heights. These controls suit very tall buildings better than mid-rise forms. We recommend reviewing upper-level setbacks considering HIRB rules and adopting a more flexible, outcome-focused framework.

New maximum tower dimension

6.14. Site-specific variation is essential for high-quality development outcomes and improves on the previous floor-area ratio method. we are concerned about the efficiency and effectiveness of a fixed maximum tower dimension.

Matters of discretion

6.15. Although the "matters of discretion" for THAB zones are helpful as a broad guideline, we have concerns that the breadth of these provisions may result in a high degree of discretion for processing planners in Auckland Council. We recommend that matters of discretion changed from a binding regulation to a broad guideline.

6.16. Developers need clear, objective, and consistently applied policy direction, supported by examples or criteria, to ensure guidance shapes development outcomes without allowing excessive discretion or affecting feasibility.

6.17. The constant references to "visual dominance," "character," and "overlooking and privacy effects" places disproportionate prioritisation on protecting the perceived visual character of existing properties at the expense of enabling urgently needed housing intensification across the city.[5] Given the THAB zone's role as a transitional zone, managing visual and character effects should not be the primary planning outcome. We recommend outcome focused standards that can be achieved through a prescriptive criterion. For example, privacy and amenity outcomes could be demonstrated through compliance with specified separation distances, window-to-window standards, screening requirements, or minimum sill heights, rather than through open-ended qualitative assessment.

6.18. We recommend that subjective and undefined qualitative phrases be replaced with clearly articulated outcomes and measurable performance criteria. This would retain a strong emphasis on good design while ensuring provisions are applied consistently, proportionately, and in a manner that supports feasibility and housing delivery.

6.19. We recommend replacing subjective and undefined qualitative phrases (such as "attractive", "healthy", "safe", "appropriate character", "complements the area's streetscape and skyline") with clear outcomes and measurable performance criteria. This approach maintains a focus on good design while ensuring consistent, proportionate, and feasible application that supports housing delivery.

7. Urban design requirements

7.1. Property Council members have significant concerns about the negative implications of the proposed design rules for development projects across multiple zones including THAB zone, Mixed-Use zones, Town Centre zones, Local Centre zones and Neighbourhood Centre zones. The following comments relate to system-wide urban design rules that apply across multiple zones. Several objectives in this section are considered subjective and susceptible to inconsistent interpretation.

7.2. Under the new Planning Bill 2025, the replacement of the Resource Management Act 1991 ("RMA"), introduces a higher regulatory threshold, especially for subjective matters involving activities with less than minor effects. These activities typically require consideration only if they contribute to cumulative effects.[6] These changes increase the

[5] Auckland Council, *PC120: Chapter H – Residential* (2025). https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/unitary/pc-120/55-pc120-chapter-h-residential.pdf

[6] New Zealand Parliament, *Planning Bill* (2025). https://www.legislation.govt.nz/bill/government/2025/0235/latest/096be8ed81fedd98.pdf

threshold for regulation, particularly around subjective matters. Criteria for non-consideration includes visual amenity, character of an area, private views and landscape effects.

7.3. We recommend that Auckland Council amends PC120 to abide by the new Planning Bill when it passes into law and that urban design provisions are framed in a clear, proportionate, and outcomes-based manner, rather than relying on broad discretionary assessments.

Building forms

7.4. We have concerns with the following requirements for building forms and site location, outlook rules, deep soil requirements, and communal amenity:

- *Building heights:* Members with apartment developments have outlined a broad standardised height threshold for specifically Town Centre, Local Centre and Mixed-Use zones. When there are dimensions for both an occupiable building height and a roof height, they may conflict with each other, because mixed-use commercial developments require higher ground-floor ceilings for retail spaces compared to tower apartments.

  We recommend that:

  - Buildings across these zones have the following dimensions: Ground level between 4 and 4.5 metres, other floors at 3.25 metres, and roofs between 1 and 2 metres; these floor-to-floor dimensions should be used to set building heights in areas depending on the number of floors.
  - We also recommend excluding lift overruns, screened rooftop plant and building services from roof height allowances, particularly in Town Centre and Mixed-Use zones. Treating rooftop plant as part of the roof height can unintentionally constrain viable floor-to-floor heights and force inefficient design outcomes.

- *New building setback at upper floors for sites outside walkable catchments*: Fixed setback distances are blunt instruments that reduce feasible floorplates and restrict development across zones that are not in THAB zones. We recommend a review of required setbacks in conjunction with Height in Relation to Boundary (HIRB) rules.

- *Required outlook space for developments*: Section 2A of PC120 explicitly requires a 20m setback for the outlook distance. In its current form, the rule is completely unworkable, and it should be scaled back. Furthermore, outlook space is now measured from the outer edge of balconies, which complicates the development process because of different measurements.

- We recommend reducing the mandatory 20 metre setback for outlook space, or changing it to a discretionary, assessment-based matter.
- We recommend reverting to measuring outlook space from the habitable room window, not the balcony edge.

- *Amended landscaped area:* The rules on deep soil rules and minimum size of deep soil areas are not workable. We recommend removing all provisions on landscaping rules and revert to the old landscaping rules.
- *Amended outlook:* The outlook standard is an important and justified requirement. However, we do not support the proposed amendment that would restrict the ability to provide outlook over common parking areas or vehicle accessways. This change could significantly decrease the number of feasible development options and constrain how sites are arranged, potentially leading to fewer new homes being built. We recommend the removal of all provisions on amended outlook.
- *New windows to street and private vehicle and pedestrian accessways:* A rigid rule on windows to streets could restrict innovative design and make some developments less viable. Using discretion would encourage high-quality design solutions without imposing a one-size-fits-all standard. We recommend that the 20% glazing rules do not apply to pedestrian access and internal access as currently proposed.
- *New deep soil and canopy tree:* Although we support increasing tree cover in urban areas, we have major issues with the provision. This provision will be unworkable, especially if the development includes basement car parking. We recommend removing these provisions.

7.5. Urban design issues arise not only in THAB but also in Town Centre, Local Centre, Neighbourhood Centre and Mixed-Use zones. THAB zones should not be disproportionately burdened compared to Mixed Housing Urban or commercial centre zones. We recommend aligning these standards across zones so that comparable building types are assessed consistently.

Open Space

7.6. The current communal outdoor living space requirements for dense apartments and terrace housing are complex and unclear, causing developer confusion about management, access, and ownership. These requirements are not easily applied to standalone dwellings.

7.7. Different building typologies exist in this zone, but open-space rules for smaller, stand-alone THAB buildings and developments create design inefficiencies and financial burdens. This makes mass-scale THAB projects harder to complete.

7.8. Sometimes, residents in high-rise apartments prefer walking a few minutes to nearby amenities, such as large public parks and cafes. We caution against a blanket imposition of open space in developments in these situations, which will lead to several disjointed smaller open spaces. Small open spaces could be a 'nice-to-have' in many projects.

7.9. Auckland Council already addresses open space needs through its existing open space provision policies. Across many locations, amenity is provided by surrounding public spaces. It should be market-led rather than prescribed from Auckland Council.

7.10. We recommend removing the mandatory communal open space requirement for apartments and allowing provision to be determined by market demand and site context.

7.11. There is limited guidance on how open space requirements apply to frequent subdivision, joint ownership, or staged development. This uncertainty creates challenges for developers, practitioners, and Auckland Council planners, particularly when multiple consenting pathways are required. Lack of clear guidance on open space requirements for staged subdivisions, joint-ownership, or multiple consenting pathways creates uncertainty for developers and practitioners and adds unnecessary interpretive pressure on Auckland Council planners.

7.12. We recommend clearer rules so that open space provided as part of a larger development counts for the whole site, rather than being required again for each subdivision or development stage. Uncertainty about duplicating open space across titles or development stages leads to confusion and unnecessary negotiation during the consent process.

8. Industrial Areas

8.1. Property Council acknowledges that PC120 prioritises residential and mixed-use intensification, which we broadly support. However, some members are concerned that rezoning and centre expansions under PC120 may reduce the overall supply and composition of industrial and light industrial land in Auckland. Industrial land is essential to Auckland's economy, supporting manufacturing, logistics, trades, and employment which depend on proximity to urban areas.

8.2. We recommend that Auckland Council examine whether PC120 reduces the supply of industrial or light industrial land and assess the economic and employment implications. If significant impacts are found, Auckland Council should consider policy responses to maintain a sufficient industrial land base to support Auckland's productivity and functionality.

9. Natural hazard provisions – Risk-adjusted thresholds

9.1. Property Council recognises that under Section 86B of the RMA, rules relating to natural hazards have had immediate effect since 3 November 2025, which is why the rules

relating to flooding and natural hazards are different from other sections of PC120. Auckland Council's determined risk levels are divided into significant, tolerable (medium), and acceptable (low).

9.2. In principle, we support a risk-based approach. However, we have major reservations about the provisions due to a lack of clarity, transparency and proportionality from Auckland Council. The three levels of risk assessment lack clear criteria for developers. The publicly available data is regional, often outdated, and the landslide mapping does not align with the proposed rules. It is inappropriate to use this mapping to classify risk at the site-specific level linked to activity status.

9.3. If hazard exposure prevents effective mitigation, restricting sensitive uses or development may be appropriate. This action should be based on a robust, site-specific risk assessment and only after considering whether the hazard can be reasonably resolved, improved, or avoided through development processes.

9.4. We oppose using regional-scale hazard mapping as an automatic trigger for risk classification or activity status. Risk should not be assigned without first assessing whether hazards have been, or can be, effectively mitigated through development design, engineering, landform modification, or adaptive measures. Across Auckland, comprehensive redevelopment of both Brownfield and Greenfield sites has often successfully avoided or reduced flood hazards. These interventions have frequently led to improved outcomes. Assigning risk classifications before evaluating mitigation options is unnecessarily rigid and inconsistent with adaptive, effects-based planning.

9.5. Numerous projects are already well advanced in their design or pre-lodgement phases, with substantial feasibility studies, engineering evaluations, and financial analyses in progress. If there is no clarity on flood overlays, these efforts and investments may be lost, delayed, or require a fresh start for vital housing and infrastructure developments.

9.6. In practice, resource consents have become significantly more complex and costly. Geotechnical Completion reports have expanded from a few pages to over 100 pages. Even minor overland flow paths or marginal hazard risks trigger full-scale assessments, costing over $5,000 on small sites. Additional testing requests further raise costs and delay projects. Developers cannot conduct proper due diligence or assess market feasibility in advance. This creates uncertainty, leaving applicants unsure how to proceed and obscuring the actual approval steps. Greater clarity is needed.

9.7. Auckland Council has stated that assessments on projects "can be verified by site-specific assessment, as per the current procedure under the operative Auckland Unitary Plan." However, the provisions of PC120 do not clearly give effect to this assurance. It remains unclear how site-specific assessments interact with mapped risk classifications and activity status under the new framework.

9.8. There are clear issues, particularly with landslide risk. PC120 does not adequately recognise that completed earthworks, slope stabilisation, or landform modification can significantly reduce or eliminate landslide susceptibility. When these steps are confirmed by a professional after construction, as in a Geotechnical Completion report, checking the area repeatedly using old or regional maps becomes wasteful, expensive, and unnecessary. Rules should be based on the current, specific conditions of the site rather than outdated ideas about risks.

9.9. We recommend applying the risk-based approach through the resource consent process when there is complete information, not at the plan-making stage.

9.10. We recommend clearer and more practical provisions that support timely technical assessments, early identification of mapping or boundary issues, and meaningful engagement with affected landowners.

9.11. We also recommend that Auckland Council streamline the restricted discretionary consent process, especially for sites with potential flood risk, so developers can understand exactly when they must undergo a specific site assessment.

9.12. We recommend that Auckland Council provide permitted or streamlined pathways where natural hazards have been resolved through completed earthworks or confirmed technical certification, including Geotechnical Completion reports.

10. Natural hazard flood maps

10.1. In the PC120 Info Sheet on natural hazards, it says that "Council must use the most up-to-date information when assessing risks from natural hazards. International and national improvements in natural hazards data means that we can now better predict natural hazards and their impacts." [7] Insufficient notice and the lack of transparency have caused immense problems for the sector.

10.2. PC120 identifies hazards using definitions, appendices, and non-statutory mapping layers on GeoMaps. These layers are developed at a regional or catchment scale and often rely on model inputs that may not reflect site-specific conditions or recent landform changes. Publicly available models may lack current information and omit key features such as overland flow paths. These gaps can impact activity status, consent requirements, and confidence in the planning framework.

10.3. Furthermore, according to our members, the released map is not accurate and does not reflect recent changes to ground level through earthworks. This is not consistent with Auckland Council's own requirements to have "most up-to-date information" on assessing risks from natural hazards or inform the resource consent process.

[7] Auckland Council, *Proposed Plan Change 120 Information Sheet #8 (2025),* https://new.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/unitary/pc-120/09-pc120-info-sheet-8-natural-hazards.pdf

10.4. Even with the new PC120 map viewer, navigating GeoMaps is still challenging. GeoMaps shows specific locations of land with major natural hazard risks. To view their land, the public must search for 'Catchments and Hydrology' to find Flood Hazard areas. These areas are categorized as 'very high hazard,' 'high hazard,' 'medium hazard,' and 'low hazard.' Publishing hazard maps with risk information on GeoMaps is useful. However, assessing comprehensive flood risk for properties based on multiple factors remains challenging.

10.5. Natural hazard susceptibility areas must be easily identifiable by non-technical users. Unfortunately, the current use of multiple hazard categories, sub-categories, and physical characteristics creates uncertainty about where rules apply and when assessment is needed.

10.6. Certain parts of the map from GeoMaps have very little utility for developers and other stakeholders in the property sector.[8] It is unclear how hazard areas were identified, what data were used, and what assumptions underpin the modelling. For example, landslide maps appear as scattered risk "dots" with insufficient detail or explanation, undermining confidence in their specific landslide risk consents.

10.7. We recommend that Auckland Council update and verify all natural hazard maps, publish the datasets and assumptions behind them, improve the usability of GeoMaps for hazard identification, and ensure maps are released early enough to allow meaningful industry engagement.

10.8. We recommend separating risk classification from hazard mapping and require that mitigation, land modification, and adaptive responses be considered before assigning risk categories or restricting development.

Downzoning to Single House zones from flood risks

10.9. Property Council believes that blanket downzoning reduces housing capacity even where development is still safe and financially feasible. PC120 may hinder efficient outcomes by classifying low-lying land as high risk without considering how development can avoid or reduce hazard exposure. Applying blanket downzoning to Single House zones across most flood-prone and hazard-identified sites is problematic.

10.10. Since the 2023 Auckland flooding and Cyclone Gabrielle, stakeholders across the property market have already internalised natural hazard risk through powerful market-based constraints and mechanisms. For example, engineered solutions such as floodplain modification, raised land, and controlled conveyance were effective during the 2023 Auckland Anniversary Floods. These mechanisms include:

[8] Auckland Council GeoMaps (accessed 4 December, 2025). https://new.aucklandcouncil.govt.nz/en/geospatial/geomaps.html

- Insurance risk adjustments – companies now price flood, landslide, and coastal hazards with extraordinary granularity.
- Business banking assessments – banks conduct their own hazard assessments and will not finance uninsurable projects.
- Engineering assessment – developers typically commission consultants that specialise in Geotech, flood modellers and civil engineers to ensure security.

10.11. Given all these built-in market safeguards, blanket downzoning produces perverse outcomes for all stakeholders. Blanket downzoning applies a precautionary response twice. First, through conservative hazard modelling and then through zoning reduction without adequately considering site-specific mitigation or adaptive adjustments. Developers, commercial banks, insurance companies, and homebuyers are all highly sensitive to natural hazard risk. Downzoning should be used only as a last resort if Auckland Council is not confident in its region-wide natural hazard provisions.

10.12. Currently, it is not possible to determine applicable resource consent requirements without site-specific assessments. Site-specific assessments should be limited to providing the required support for those consent applications. We recommend that Auckland Council explicitly identify the types of projects and sites for which resource consent requires site-specific assessments. This change would improve transparency and make the process more efficient.

10.13. Auckland Council's hazard maps need to be accurate, contemporary, and proportionate. The current rules restrict development capacity, even in areas with low risk. For example, if only a quarter of a site faces a minor flood path or low-depth hazard, that area cannot be adjusted accordingly.

10.14. In several cases, sites have no identified flooding risk, or only minor and manageable hazard constraints, yet are subject to the same restrictive zoning response as higher-risk sites. This lack of differentiation does not clearly link actual risk to the proposed planning response. Penalising sites without demonstrable exposure to hazards is neither proportionate nor evidence-based and does not reflect good planning practice.

10.15. The solution should not be blanket downzoning across entire zones. For example, where site-specific engineering assessments demonstrate that risk can be reduced to tolerable or acceptable levels, Auckland Council should rely on those assessments and apply risk-proportionate thresholds. When hazard mapping affects only part of a site, immediately downzoning the entire property is an overly broad approach that may unnecessarily restrict development on suitable land. More flexible exemptions restrict genuinely unsafe development, while also allowing feasible and safe projects to proceed.

10.16. Blanket downzoning reduces certainty for plan users by imposing retrospective changes unrelated to specific site conditions. This practice may discourage investment, delay development decisions, and increase disputes during consenting and plan interpretation. Landowners and developers depend on predictable and transparent signals. Reducing zoning intensity without strong, site-specific justification undermines confidence in the long-term integrity of the Auckland planning framework.

10.17. We recommend replacing blanket downzoning based on regional-scale and outdated hazard datasets with a risk-proportionate framework that relies on site-specific hazard assessments for partial or low-risk hazards and enabling taking into feasible mitigation measures such as engineering or design mitigation before restricting development capacity.

10.18. We recommend that Auckland Council provide explicit guidance on resource consent management, clearer definitions for hazard areas, and clear procedural pathways including specific evidence requirements.

10.19. We recommend that Auckland Council enables redevelopment of hazard-exposed land where risk can be reduced to tolerable or acceptable levels through engineering or adaptive measures.

10.20. We also recommend that Auckland Council provide full transparency on methodologies, thresholds, and the underlying datasets associated with natural hazards, to provide certainty to industry.

11. General comments on natural hazards

11.1. PC120 identifies climate change risks over 50 to 150 years with strong reliance on a high-end 3.8 degrees of warming projection. This significantly exceeds standard landowner and investment timeframes. Using it as a single baseline results in overly conservative and inconsistent assessments. The risk forecasts are uncertain, but costs are immediate. Land values have already dropped, development is constrained, and loanable funds are limited. No clear or practical mitigation pathways exist for private or public actors.

11.2. Property Council members recognise and commend Auckland Council's proactive attempts to identify major natural hazard risks. However, they have not explained in sufficient terms how the development community can reduce or manage that risk. Alternative methods for mitigating risks include active engineering of waterways, improved stormwater systems with updated engineered coastal protection, and water infrastructure investments.

11.3. We recommend a more balanced approach that combine risk identification with clear, workable mitigation pathways, supported by both private investment and proactive Council infrastructure management.

11.4. We recommend that climate and hazard scenarios be clearly specified in plan provisions, applied proportionately, and aligned with national and international best practice.

11.5. We also recommend Auckland Council revert largely to the AUP approach on natural hazard regulations.

12. Conclusion

12.1. We support the intent of PC120 enabling housing intensification and climate resilience across Auckland. We support the extension of walkable catchments, allowing greater building heights near rapid transit corridors and focusing density growth across Frequent Transit Networks. We also welcome medium density zoning for many areas across suburban and urban areas in the city.

12.2. However, we caution Auckland Council on onerous rules across two critical areas of PC120 – the urban design requirements in THAB zones and natural hazard provisions. These rules could lead to unintended consequences. We understand the intent and objectives of many of the proposed provisions, but they currently lack clarity and need specific changes.

12.3. We remain committed to working with Auckland Council to refine PC120. With targeted adjustments, PC120 can successfully enable more housing in the right places, strengthen resilience, and support the development of vibrant, well-functioning communities across Auckland.

12.4. Property Council members invest, own, and develop property across New Zealand. We thank Auckland Council for the opportunity to submit our views on PC120 and **wish to speak to our submission.**

12.5. For further enquiries, please do not hesitate to contact Leonard Hong, Senior Advocacy Advisor, via email: leonard@propertynz.co.nz

Yours Sincerely,

Martin Cooper

Auckland Regional Chair, Property Council New Zealand