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PC120 Submission Analysis: DRAFT Report

Consolidated analysis of 10,550 submissions on Auckland Council's Proposed Plan Change 120 (Housing Intensification and Resilience).

1. Executive Summary

This report consolidates the analysis of **10,550 submissions** on Auckland Council's Proposed Plan Change 120 (PC120): Housing Intensification and Resilience. Of these, 10,500 received full thematic analysis via a multi-stage pipeline (PDF text extraction, regex pre-pass, LLM classification, and vision-based analysis for scanned documents).

Headline position split:

- **Oppose:** 6,840 (64.8%)
- **Amend:** 3,048 (28.9%)
- **Support:** 614 (5.8%)

Top 5 themes by frequency:

- Zoning (Specific): 6,579 (62.7%)
- Density Too High: 6,259 (59.6%)
- Character & Amenity: 5,758 (54.8%)
- Infrastructure Capacity: 5,713 (54.4%)
- Environmental / Natural Hazards: 4,875 (46.4%)

Key Findings (Public Voice)

These findings summarise the dominant concerns and priorities expressed across the submission set, using the report's quantified results to reflect the balance of views and the themes people most often raised.

- **Overall direction:** most submitters opposed PC120 as notified (**6,840**, **64.8%**), but a substantial share sought changes rather than outright rejection (**3,048**, **28.9%**). Only **614** submissions (**5.8%**) expressed support.
- **What people most often talked about:** the most frequently raised issues were **zoning impacts on specific areas** (**6,579**, **62.7%** of analysed), **density perceived as too high** (**6,259**, **59.6%**), **character and amenity** (**5,758**, **54.8%**), **infrastructure capacity** (**5,713**, **54.4%**), and **environmental / natural hazards** (**4,875**, **46.4%**).
- **Intensity of concern where "density too high" was raised:** when submitters flagged density as too high, it was overwhelmingly linked with opposition (**91.2%** oppose; **5,707** submissions).

- **Liveability impacts were a major driver of opposition:** themes with the strongest opposition consensus included **property values** (**94.4%** oppose), **traffic congestion** (**91.0%** oppose; **4,214** mentions), **privacy/sunlight/shading** (**86.0%** oppose), and **character & amenity** (**85.1%** oppose; **5,758** mentions).
- **Infrastructure and services were a widespread, cross-cutting concern:** over half of analysed submissions raised **infrastructure capacity** (**54.4%**; **5,713**). Where raised, most sought to stop or scale back intensification until capacity is addressed (**72.4%** oppose; **24.3%** amend).
- **Hazards and resilience produced a "restrict vs correct" split: 4,875** submissions (**46.4%**) raised environmental/natural hazard issues, with a relatively higher share seeking amendment (**35.6%**) than seen in many other high-frequency themes—consistent with submissions that support the intent of risk-based planning but dispute mapping, thresholds, or site-level application.
- **Where support is most visible:** themes with comparatively higher support were **housing supply & affordability** (**34.5%** support), **density too low** (**26.9%** support), and **public transport** (**21.2%** support). These are also the most "mixed" themes (no single position dominates), indicating a genuine trade-off in public views.
- **Submissions were predominantly from individuals: 7,480** submissions (**70.9%**) were from individuals, **2,523** (**23.9%**) from professional agents, and **540** (**5.1%**) from organisations—meaning the headline results largely reflect individual resident perspectives, with professional and organisational inputs adding technical and policy detail.
- **Geographic coverage was strong: 9,134** of **10,550** submissions (**86.6%**) included a locality, with the largest submission volumes concentrated in a small number of localities (top locality: **Mt Eden** & **Herne Bay**, with **224** & **217** submissions respectively; **2.1%** of all submissions each).

2. Overall Position Analysis

Position Distribution

overall_position	count	%
oppose	6840.0	64.8
amend	3048.0	28.9
support	614.0	5.8
	48.0	0.5

Position by Submitter Type (row %)

submitter_type	amend	oppose	support
individual	0.5	26.9	67.0	5.5
organisation	0.0	55.4	37.0	7.6
professional_agent	0.0	29.1	64.4	6.5

Position by Submission Type (row %)

submission_type	amend	oppose	support
email_attachment	0.4	35.1	63.0	1.4
form5	0.0	52.3	44.4	3.3
other	1.7	48.1	48.4	1.7
standard_form	0.0	21.5	70.9	7.6
withdrawn	100.0	0.0	0.0	0.0
withheld	100.0	0.0	0.0	0.0

Comparison to Synthesis Claims

The LLM synthesis estimated 68–75% opposing, 15–22% seeking amendment, and 5–10% support. Actual figures:

- Oppose: 6,840 (64.8%) — outside claimed range

- Amend: 3,048 (28.9%) — outside claimed range
- Support: 614 (5.8%) — within claimed range

3. Thematic Analysis

Theme Frequency (all 20 themes)

theme	count	% of analysed
Zoning (Specific)	6579.0	62.7
Density Too High	6259.0	59.6
Character & Amenity	5758.0	54.8
Infrastructure Capacity	5713.0	54.4
Environmental / Natural Hazards	4875.0	46.4
Traffic Congestion	4214.0	40.1
Process & Consultation	3735.0	35.6
Building Height	3724.0	35.5
Public Transport	3412.0	32.5
Housing Supply & Affordability	3216.0	30.6
Resilience & Climate	2769.0	26.4
Privacy / Sunlight / Shading	2454.0	23.4
NPS-UD Compliance	2118.0	20.2
Cultural Heritage	2046.0	19.5
Trees & Vegetation	1736.0	16.5
Community Facilities	1644.0	15.7
Property Values	1506.0	14.3
Density Too Low	1063.0	10.1
Natural Environment	957.0	9.1
Construction Impacts	331.0	3.2

Mean themes per submission: 6.1

Top 10 Co-occurring Theme Pairs

	theme_1	theme_2	co_count
0	Character & Amenity	Density Too High	4715
1	Infrastructure Capacity	Density Too High	4505
2	Density Too High	Zoning (Specific)	4188
3	Character & Amenity	Zoning (Specific)	4113
4	Infrastructure Capacity	Character & Amenity	3886
5	Infrastructure Capacity	Zoning (Specific)	3810
6	Environmental / Natural Hazards	Zoning (Specific)	3783
7	Traffic Congestion	Density Too High	3459
8	Infrastructure Capacity	Traffic Congestion	3440
9	Infrastructure Capacity	Environmental / Natural Hazards	3271

Per-Theme Position Breakdown (row %)

	amend	oppose	support
Zoning (Specific)	43.9	49.8	6.2
Density Too High	8.5	91.2	0.3
Character & Amenity	11.2	85.1	3.7
Infrastructure Capacity	24.3	72.4	3.3
Environmental / Natural Hazards	35.6	55.5	8.9
Traffic Congestion	7.6	91.0	1.4
Process & Consultation	23.9	75.2	0.9
Building Height	25.5	70.6	3.9
Public Transport	32.8	46.0	21.2
Housing Supply & Affordability	39.1	26.4	34.5
Resilience & Climate	49.9	41.6	8.5

Privacy / Sunlight / Shading	13.4	86.0	0.7
NPS-UD Compliance	47.6	40.7	11.7
Cultural Heritage	19.5	72.1	8.4
Trees & Vegetation	21.9	73.8	4.3
Community Facilities	25.6	69.1	5.3
Property Values	4.5	94.4	1.1
Density Too Low	39.4	33.7	26.9
Natural Environment	28.7	64.1	7.2
Construction Impacts	17.8	82.2	0.0

Themes with Strongest Opposition Consensus

- Property Values: 94.4% oppose
- Density Too High: 91.2% oppose
- Traffic Congestion: 91.0% oppose
- Privacy / Sunlight / Shading: 86.0% oppose
- Character & Amenity: 85.1% oppose

Themes with Most Support

- Housing Supply & Affordability: 34.5% support
- Density Too Low: 26.9% support
- Public Transport: 21.2% support
- NPS-UD Compliance: 11.7% support
- Environmental / Natural Hazards: 8.9% support

Most Divided Themes (lowest single-position dominance)

- Housing Supply & Affordability: max position 39.1%
- Density Too Low: max position 39.4%
- Public Transport: max position 46.0%

- NPS-UD Compliance: max position 47.6%
- Zoning (Specific): max position 49.8%

4. Thematic Deep-Dives

The following sections combine quantitative data with qualitative narrative from the LLM-generated thematic synthesis.

Theme 1: Infrastructure Capacity

Frequency: 5,714 submissions (54.4% of analysed)

Position breakdown:

- Oppose: 4,139 (72.4%)
- Amend: 1,388 (24.3%)
- Support: 187 (3.3%)

Description and Relevant Provisions

This is the **single most frequently cited theme** across the entire submission corpus, appearing in some form in the vast majority of substantive submissions. It relates to PC120's general intensification provisions across all residential zones (THAB, MHU, MHS, MDRS), the qualifying matters framework, the walkable catchment methodology, and the plan's deliberate exclusion of infrastructure assessment from its scope. Submitters raise concerns about water supply, wastewater, stormwater, roading, electricity, schools, hospitals, GPs, parks, and emergency services.

Balance of Opinion

- **Oppose or seek amendment:** approximately 85–92% of submissions raising this theme
- **Support (conditionally or unconditionally):** approximately 5–10%
- Even broadly supportive submitters typically attach infrastructure sequencing conditions

Arguments Against (Most Common)

Stormwater and wastewater incapacity: - Existing networks in many areas are already at or beyond capacity, with raw sewage overflows contaminating beaches (Te

Atatu Peninsula, Cockle Bay, Howick, St Heliers, Herne Bay, Freemans Bay, Papatoetoe, Meadowbank), stormwater failures during ordinary rain events, and drainage systems designed for much lower residential densities. - Specific examples cited include: Watercare's November 2024 Network Capacity report identifying wastewater limitations in East Auckland, Three Kings, Cockle Bay, and Te Atatu Peninsula; Army Bay wastewater plant moratorium on new connections until at least 2031 (Whangaparaoa/Gulf Harbour, cited by hundreds of submissions); Cockle Bay Branch sewer upgrade not scheduled until 2037; 395 dry-weather sewage spills per year in Upper Tamaki Estuary; aging combined sewage/stormwater systems in Meola Catchment (Sandringham), St Marys Bay, Herne Bay, and Freemans Bay dating to the 19th century. - The 2023 Auckland Anniversary Weekend floods and Cyclone Gabrielle are repeatedly cited as demonstrating that existing systems cannot manage current demand, let alone intensified demand.

No funded infrastructure plan: - PC120 was deliberately scoped to exclude infrastructure capacity assessment, which submitters characterise as contrary to RMA sections 5–7 and inconsistent with good planning practice. - No funded, committed, or sequenced infrastructure upgrade programme accompanies the rezoning, meaning intensification will proceed ahead of — not alongside — necessary improvements. - Development contributions are described as an inadequate substitute for proactive public infrastructure investment.

Schools, health, and community facilities: - Schools are at or over roll capacity across intensification areas (Cockle Bay, Howick, Massey, Sunnynook, North Shore, East Auckland, and many others), operating from temporary classrooms with no funded expansion plans. - Hospitals, GP surgeries, and urgent-care facilities are under severe pressure in East Auckland, North Shore, South Auckland, and beyond. - Parks, libraries, and community centres are also cited as insufficient.

Roads and emergency access: - Narrow residential streets, cul-de-sacs, and single-access roads physically cannot accommodate the traffic generated by higher-density development. - Emergency vehicle access is already compromised in many areas due to on-street parking overflow, and intensification will worsen this. - Peninsula communities (Te Atatu, Devonport, Bucklands Beach, Whangaparaoa, Northcote Point, Half Moon Bay) present single-access-road constraints as a hard physical barrier to further intensification.

Electricity networks: - Raised as a specific concern in Te Atatu Peninsula and Sunnynook; Counties Energy sought explicit recognition of electricity distribution infrastructure as a qualifying matter.

Arguments in Support

- Concentrating density near existing transit and urban infrastructure is more cost-efficient than greenfield sprawl, which requires entirely new networks.

- Higher population density makes infrastructure investment more viable and cost-effective per dwelling.
- The CRL investment of $5.5 billion and other transit infrastructure represent sunk public costs that should be leveraged through intensification near those corridors.
- Infrastructure investment follows population demand; planning must proceed before demand peaks.
- Auckland's brownfield and infill development saves an estimated $140,000 per lot compared to greenfield infrastructure extension.

Notable Sub-themes and Submitter Distinctions

- **Individual residents** cite personal experience of infrastructure failure (flooding, parking overflow, school waitlists, beach closures).
- **Resident organisations** (Cockle Bay Residents and Ratepayers Association, Te Atatu Rivercare Group, BEBRRA, Chatswood community, Farm Cove/Sunnyhills groups, STET, TEPS) provide more systematic infrastructure analyses.
- **Professional planning and engineering agents** cite specific Watercare capacity documents, stormwater catchment hydrological analyses, and NPS-UD Policy 11 obligations.
- **Certifying tradespeople** (a plumber, a stormwater engineer) provide expert testimony on specific infrastructure inadequacies.
- **Organisations** (Water NZ, CIWEM Aotearoa, Natural Hazards Commission, Insurance Council of NZ) support the plan's risk management intent but seek enforceable provisions with defined damage thresholds.
- **Developer submitters** acknowledge infrastructure as a constraint but frame it as manageable through site-specific engineering solutions and resource consent conditions.
- **Transpower** raises the National Grid as requiring recognition as a qualifying matter.

Consensus Assessment

Near-universal consensus among opposing and amending submitters that infrastructure upgrades must precede or accompany intensification. This is the most broadly and deeply held concern across all submitter types, localities, and zone types. There is essentially no substantive submission from a non-developer source that supports PC120 without qualification and does not mention infrastructure constraints.

Theme 2: Traffic Congestion, Parking, and Road Safety

Frequency: 4,214 submissions (40.1% of analysed)

Position breakdown:

- Oppose: 3,836 (91.0%)
- Amend: 319 (7.6%)
- Support: 60 (1.4%)

Description and Relevant Provisions

Closely linked to infrastructure capacity but focused specifically on road network performance, on-street parking, pedestrian safety, and emergency vehicle access. This theme arises across all intensification provisions but is particularly acute where PC120 removes or reduces minimum parking requirements and enables higher-density development on narrow residential streets.

Balance of Opinion

- **Oppose or seek amendment:** approximately 88–95% of submissions raising this theme
- **Support (transit-oriented density reduces car dependency):** approximately 5–10%
- Some otherwise-supportive submitters seek mandatory minimum parking as an amendment

Arguments Against (Most Common)

On-street parking overflow: The most universally cited specific concern across the entire corpus. Submitters across every part of Auckland describe streets already reduced to effectively one lane by vehicles from new townhouse and apartment developments built without adequate on-site parking. Specific streets cited as particularly dangerous include: Litten Road/Sandspit Road (Cockle Bay), Lake Road (Devonport), Belle Vue Avenue (Northcote Point), Onewa Road (Birkdale), Godden Crescent (Mission Bay), John Shaw Drive (St Johns), Sale Street, Coates Road/Evelyn Road, Heaton Grove, Tranmere Road, Gardner Avenue, and many others.

Emergency vehicle access: Multiple submitters specifically raise the risk that ambulances and fire trucks cannot navigate congested residential streets, with specific crash incidents cited as evidence.

Cul-de-sac and no-exit streets: Consistently raised as physically incapable of absorbing THAB-level intensification: Appleyard Crescent (Meadowbank), Cotswold Lane, Kanono Way, Kerria Place, Mappin Place, Trelawny Place, Keith Avenue (Remuera),

Sefton Avenue, John Gill Road, Maybeck Road, Indus Place, and many others. These streets were never designed to serve as intensification corridors.

Peninsula and single-access communities: Te Atatu Peninsula (one road in/out), Devonport Peninsula (Lake Road), Bucklands Beach, Half Moon Bay, Northcote Point, Golflands, Gulf Harbour, Whangaparaoa Peninsula, and Chatswood (three road access points) generate the most acute traffic concern. Physical geography creates hard constraints on road duplication.

School-zone congestion: School drop-off and pick-up times create already-dangerous conditions near intensification areas: Cockle Bay schools (four in proximity), Northcote College (Birkdale), Sandspit Road schools (Howick), Kelvin Road (Remuera), Meadowbank Primary, Mt Albert Grammar, and many others.

Public transport cannot substitute for cars: Many submitters explicitly reject the assumption that residents of intensified areas will shift to public transport, citing Auckland's geography, dispersed employment, family transport needs with multiple vehicles and children at different schools, and the inadequacy of existing services.

Removal of parking minimums: Identified as the key policy driver of the overflow problem. Multiple submitters note this is partly a consequence of the NPS-UD rather than PC120 alone, but frame their lived experience of its cumulative impacts as grounds for amendment.

Arguments in Support

- Transit-oriented intensification reduces car dependency and vehicle kilometres travelled over time.
- Concentrating density near public transport creates the patronage needed to fund improved services — a virtuous cycle.
- Prior sprawl to fringe suburbs has worsened motorway congestion; central intensification redirects demand to walkable neighbourhoods.

Amendment Requests

- Mandatory minimum off-street parking scaled by bedroom count (typically 1–2 spaces per unit), funded by developers.
- Narrow Street qualifying matter for streets below a specified width.
- Public transport subsidies funded from parking permit revenue.
- Prohibition on intensification on no-exit and cul-de-sac streets.

Notable Sub-themes

- Removal of parking minimums is frequently cited as a pre-existing change predating PC120 (from the NPS-UD) whose consequences are now being attributed to PC120, reflecting cumulative intensification experience.
- A transport engineer submitted professional evidence that PC120 would generate *fewer* car trips than PC78 for equivalent residential growth by concentrating density near transit, one of very few technical counter-arguments.

Consensus Assessment

Very strong consensus among opposing submitters. Parking overflow and traffic congestion are among the most viscerally experienced concerns, with submitters describing conditions they personally navigate daily.

Theme 3: Building Height

Frequency: 3,724 submissions (35.5% of analysed)

Position breakdown:

- Oppose: 2,637 (70.6%)
- Amend: 952 (25.5%)
- Support: 146 (3.9%)

Description and Relevant Provisions

Building height is one of the most specifically targeted technical concerns, relating directly to zone-specific height limits in the THAB zone (typically 22m/6 storeys as standard, up to 34.5m/10 storeys near some rapid transit stops, and 50m/15 storeys in walkable catchments of major rapid transit and the city centre), height variation controls, height-in-relation-to-boundary (HIRB) rules, and specific height provisions for individual localities.

Balance of Opinion

- **Oppose (heights too high):** approximately 72–85% of submissions on this theme
- **Seek amendment (accept some height with lower limits or graduated transitions):** approximately 12–20%
- **Support or seek greater height:** approximately 3–10% (primarily developer/landowner submissions)

Arguments Against (Most Common)

Scale incompatibility: Heights of 6–15 storeys are described as grossly incompatible with surrounding 1–2 storey residential development across virtually every suburban context. The jump from single-storey heritage bungalows or villas to 10–15 storey apartment towers is characterised as an extreme, disproportionate, and irreversible step change.

Specific height provisions attracting concentrated opposition: - **50m Special Height Variation** (approximately 15 storeys): The most consistently opposed single provision in the corpus. Applied near the city centre edge and Ponsonby Road Town Centre, this is opposed by organised clusters from St Marys Bay, Freemans Bay, Herne Bay, Parnell, and adjacent suburbs. Specific streets cited: Arthur Street (Freemans Bay), Franklin Road vicinity, Lawrence/Wallace Streets (Herne Bay), Walters Road, Jervois Road, Domain Drive (Parnell). - **34.5m near rapid transit stations** (approximately 10 storeys): Heavily contested at Baldwin Avenue and Mt Albert stations (added at the final legislative stage without Select Committee scrutiny — a specific procedural objection raised by multiple detailed submissions), Kingsland/Morningside, Meadowbank, and East Coast Road/Browns Bay. - **22m standard THAB height** (6 storeys): Contested in outer suburbs and heritage areas as still excessive relative to local context.

Sunlight and shading: Loss of sunlight and daylight access is raised in over 200 individual submissions as the most quantifiable personal harm from height increases, with documented impacts on passive solar heating, vitamin D, health and wellbeing, solar panel generation, and garden productivity. One submission provides detailed technical modelling of solar panel generation losses. The HIRB rule change from the MHS standard (3m+45° recession plane) to the THAB standard (20m vertical then 60° angle) is specifically identified as dramatically worsening shading for neighbours.

Privacy and overlooking: Overlooking from upper-floor apartment windows into private gardens, pools, living areas, and bedrooms is consistently raised alongside height concerns.

Viewshafts: Volcanic cone viewshafts (to Maungawhau/Mt Eden, Maungakiekie/One Tree Hill, Maungarei/Mt Wellington, Māngere Mountain, Puketāpapa) are raised as heritage and cultural values at risk from height increases, with specific concerns about the Tūpuna Maunga Authority's statutory role.

Heritage context: Heights of 50m in narrow 19th-century streets (Arthur Street, Franklin Road, Parnell Road) are described as incompatible with the physical fabric of historic areas and inconsistent with international heritage management practice.

Fire safety: References to FENZ capacity constraints and the Grenfell Tower fire are raised by some submitters in connection with high-rise residential construction.

Arguments in Support / Seeking Greater Height

- Heights up to 15 storeys near major rapid transit stations are rational given transit catchment logic and NPS-UD Policy 3 obligations.
- Taller buildings with smaller footprints allow more green space at ground level.
- Heights near CRL stations, Northern Busway, and key rail corridors are internationally standard practice.
- Several developer submitters argue that upper floor setback and outlook space standards for buildings above 22m unnecessarily reduce feasible development capacity without adequate s.32 justification.

Amendment Requests (Widespread)

- A graduated/tapered height approach: tallest buildings immediately adjacent to station cores, stepping down progressively with distance (the most common amendment position across both opponents and moderate supporters).
- Maximum of 3–6 storeys on residential side streets; greater heights only on arterials immediately adjacent to stations.
- Mandatory height transition zones between high-density and single-house zones.
- Height limits tied to street width rather than blanket zone rules.
- A registered architect specifically advocates for 5–8 storey medium-density as more liveable, affordable, and sustainable than towers or dispersed suburban infill.

Consensus Assessment

Strong consensus against the highest height provisions (50m, 34.5m) in established residential suburban contexts. Near-universal agreement — including among many moderate supporters — that graduated height controls reflecting proximity to transit and existing built character would produce better outcomes than the current flat-catchment approach.

Theme 4: Scale of Intensification / Density Too High

Frequency: 6,259 submissions (59.6% of analysed)

Position breakdown:

- Oppose: 5,707 (91.2%)
- Amend: 531 (8.5%)
- Support: 21 (0.3%)

Description and Relevant Provisions

This theme captures broad opposition to PC120's overall quantum and geographic extent of intensification — the scale of upzoning from Single House to MHU or THAB, the geographic breadth of walkable catchments, and the two-million-dwelling housing capacity target — distinct from (though overlapping with) specific infrastructure or character concerns.

Balance of Opinion

- **Oppose (density too high):** approximately 70–80% of submissions raising this theme
- **Seek amendment (targeted approach):** approximately 13–18%
- **Support or seek greater density:** approximately 5–8%

Arguments Against (Most Common)

The two-million-dwelling capacity target: This is the most technically contested single planning parameter in the entire corpus. Hundreds of submissions — particularly from inner-city suburbs — argue that: - The target misinterprets Schedule 3C of the RMA and represents 130–200 years of theoretical capacity, not a 30-year feasible planning horizon. - Auckland Council's own 30-year demand projection of approximately 241,000 additional dwellings makes the target grotesquely disproportionate. - The existing AUP already provides approximately 900,000 dwellings of unbuilt capacity, making PC120's additional provision unjustified. - CBD and Future Urban Zone capacity has not been counted, inflating the apparent shortfall. - Auckland Council's own s.32 analysis reportedly acknowledged the theoretical horizon extends well beyond 30 years. - Jan Gehl's consultancy had recommended maximum 800m walkable catchments; PC120 uses 1200m without adequate justification.

Blanket application without local assessment: The "one-size-fits-all" application of density rules to diverse localities is widely criticised. Specifically: - THAB density applied to small lots, cul-de-sacs, back-land parcels, or streets not near genuine rapid transit is characterised as spatially inappropriate. - Density increases in outer suburbs (Howick, Flat Bush, Pakuranga, East Auckland, Whangaparaoa, Waiuku, Warkworth, Glenbrook, Gulf Harbour, Red Beach) are described as mismatched with available infrastructure and public transport. - Recently built master-planned communities (Pinehill, Stonefields, Northpark, Millwater, The Gardens) are being upzoned despite high-quality existing housing stock that will not be demolished. - Rural towns (Waiuku, Warkworth, Glenbrook) are being treated identically to urban centres despite lacking any urban-scale infrastructure or transit.

Existing capacity not exhausted: Multiple submitters argue market and construction constraints — not zoning — are the real barriers to housing delivery, and that enabling 2 million additional dwellings is disconnected from commercial feasibility.

Rollback of PC78/MDRS: The rollback of the blanket three-storey MDRS provisions while simultaneously proposing selective high-density zoning is characterised by some submitters as reducing overall housing supply certainty.

Arguments in Support / Seeking Greater Density

- Auckland faces a genuine and severe housing crisis; intensification near transit is economically, socially, and environmentally necessary.
- The CRL investment requires supporting residential density to be economically justified.
- Outer suburbs like Pakuranga and Howick should not escape intensification while inner suburbs bear the burden.
- Half-measures will not resolve supply shortfalls; bold action is overdue.
- Building "up not out" preserves productive rural land and reduces carbon emissions from sprawl.

Notable Sub-themes

- **Downzoning opposition:** A distinct sub-group opposes PC120 because it *reduces* their existing zoning (e.g., Herald Island reverting from PC78 MHS to Single House Zone; Massey reverting from MHU to MHS; Totara Heights from MHS to Single House Zone). These submitters argue the downzoning is internally inconsistent with PC120's own intensification objectives.
- **Covenant conflicts:** Several submitters argue intensification conflicts with registered title covenants and reasonable expectations at purchase.
- **Density too low (upzoning seekers):** A distinct minority of developer/landowner submissions argue their properties have been unjustifiably excluded from intensification zones or retained at lower-density classifications, seeking THAB or higher-density zoning on well-located sites.

Consensus Assessment

Strong consensus among opposing submitters that the overall scale of intensification is excessive and its geographic application is insufficiently targeted. Even many submitters who support housing intensification in principle (including transit-oriented advocates) oppose the blanket catchment approach and the two-million-dwelling target methodology.

Theme 5: Neighbourhood Character and Amenity

Frequency: 5,758 submissions (54.8% of analysed)

Position breakdown:

- Oppose: 4,904 (85.1%)
- Amend: 645 (11.2%)
- Support: 213 (3.7%)

Description and Relevant Provisions

Character and amenity concerns are raised across virtually all geographic areas, spanning suburban residential character, heritage streetscapes, coastal and village identities, and family-friendly neighbourhood qualities. These relate to PC120's intensification rules for all residential zones, the absence of mandatory design quality requirements, and the reduction of qualifying matter protections for established character areas.

Balance of Opinion

- **Oppose:** approximately 80–90% of submissions raising this theme
- **Seek amendment (accept growth with design standards):** approximately 8–15%
- **Support or neutral:** approximately 2–5%

Arguments Against (Most Common)

Irreversible character transformation: High-density development is replacing low-rise, spacious, family-oriented suburban environments with crowded multi-unit developments of poor design quality. The language used by submitters is emotionally charged: "concrete wastelands," "slums," "rabbit hutches," "noddy houses," "sausage apartments," "matchbox alleys," "cookie-cutter," "soulless." Once established character is lost, it cannot be recovered.

Aesthetic concerns about existing intensification: Many submitters cite visible examples of recent intensification (flat-façade terrace houses, full-site coverage developments, minimal landscaping) as evidence of what PC120 will produce at greater scale. Several architects and urban designers provide more technically grounded versions of this argument.

Family-friendly environment: Loss of private gardens, outdoor play spaces, and safe streets for children; loss of community cohesion from transient apartment populations.

Lifestyle expectation: Residents who deliberately chose outer suburban or coastal locations specifically to avoid urban density argue PC120 retroactively undermines their investment decisions without adequate justification.

Cultural dimensions: A distinctive submission from an Ōtara community group argues that high-density apartment living is culturally incompatible with multi-generational Pacific family living patterns that require spacious standalone homes with yards — an equity and cultural diversity concern within the character debate.

Small towns and rural areas: Waiuku, Warkworth, Glenbrook, Edgewater, and similar settlements generate particularly emotionally charged submissions framing intensification as an existential threat to community identity and rural character.

Arguments in Support

- Vibrant, dense neighbourhoods support local businesses, markets, cultural activity, and the "15-minute city."
- Current low-density suburbs create poor amenity through car dependency, social isolation, and unaffordability.
- Character concerns are used to protect privilege and restrict access to well-amenitied suburbs.
- Auckland's density is too low by international standards to support world-class urban life.

Notable Sub-themes

Special Character Areas (also covered as Theme 6): Heritage suburbs generate the most detailed and legally sophisticated character arguments, distinguishing formal heritage assessment from general amenity preferences.

Village and coastal identity: Cockle Bay, Gulf Harbour, Torbay, Wattle Downs, East Coast Bays, Howick, Mangere Bridge, Devonport, Birkenhead, Milford, and Waiuku generate submissions specifically framing their communities as coastal lifestyle or rural villages fundamentally incompatible with metropolitan-scale intensification.

Design quality as a separate concern: Several submitters (including registered architects and urban designers) support intensification in principle but argue PC120 lacks adequate urban design standards, mandatory setbacks, landscaping requirements, or façade controls to ensure quality outcomes. The MHUD (Medium High-rise Urban Design) diagrams are specifically criticised as producing street-facing units oriented side-on, generating flat facades and poor street activation.

Consensus Assessment

Strong consensus among residential submitters that character and amenity must be protected, though the proposed mechanism varies significantly between those who oppose any intensification and those who accept density but demand design controls and transition zones.

Theme 6: Cultural Heritage and Special Character Areas

Frequency: 2,046 submissions (19.5% of analysed)

Position breakdown:

- Oppose: 1,481 (72.1%)
- Amend: 401 (19.5%)
- Support: 173 (8.4%)

Description and Relevant Provisions

This theme relates specifically to PC120's reduction of the Special Character Area (SCA) overlay — removing approximately 15,000–25,000 properties from formal heritage protection depending on measurement method — and the treatment of Historic Heritage Overlays, scheduled buildings, and Māori cultural values. Relevant provisions include Chapter D18 (Special Character Areas Overlay), Schedule 14 and 15 of the AUP, qualifying matters provisions, and PC120's relationship with Treaty of Waitangi obligations.

Balance of Opinion

- **Oppose removal of SCA protections:** approximately 85–95% of submissions directly engaging this theme
- **Support SCA protection while accepting broader intensification:** the majority position
- **Support SCA removal to enable intensification:** approximately 2–5% (primarily developers and landowners with site-specific interests)

Arguments Against SCA Removal (Dominant)

Irreplaceability: Auckland's SCAs contain an internationally significant, globally rare collection of 19th and early 20th century timber architecture (Victorian and Edwardian villas, bungalows, Arts and Crafts, Californian bungalows) built from kauri, rimu, and other native timbers. Once demolished, these buildings and their materials cannot be recreated. Multiple submitters describe this architecture as a taonga of global uniqueness.

Proportionality: SCA properties represent less than 1–3% of Auckland's housing land area. Their intensification would have negligible impact on overall housing capacity given PC120's enormous scale, while causing irreversible heritage harm. This argument — accepted even by some submitters broadly supportive of intensification — is among the most persuasive in the corpus.

Survey methodology deficiency: The desktop heritage survey (relying primarily on Google Street View) used to justify SCA removals is widely criticised as technically

deficient. It is said to focus on individual building integrity rather than streetscape character, produce inconsistent results, and fail to capture spatial, contextual, ecological, and historical values. Multiple localities argue the survey contains factual errors that have been incorporated into planning decisions.

Absence of s.32 justification: Multiple legally sophisticated submissions argue that no adequate RMA s.32 analysis has been provided for the specific removal of individual streets or properties from the SCA overlay, making the decisions procedurally defective.

Broken planning covenant: Residents who have invested substantially in heritage restoration — sometimes over $1 million — in good-faith reliance on SCA protections argue their removal represents a betrayal of planning trust and an inequitable taking of value.

Cohesiveness: The collective streetscape value of SCAs depends on all properties being subject to the overlay. Partial removal — even of a minority of properties — destroys the integrity that gives the whole area its character and planning rationale.

Treaty and ecological significance: Herne Bay, Freemans Bay, and St Marys Bay submissions raise the ecological and spiritual significance of kauri-built dwellings as remnants of Te Ara Hauāuru and Waitakere ancient forests, invoking Treaty of Waitangi obligations under RMA s.6(f) and s.8. This is a non-conventional but recurring argument in coordinated inner-city submissions.

Specific localities generating concentrated opposition: St Marys Bay (multiple coordinated submissions), Freemans Bay (multiple coordinated submissions), Herne Bay (multiple coordinated submissions), Parnell, Kingsland, Balmoral, Mt Eden, Mt Albert (Kitenui Avenue — the largest single-street cluster with 11+ near-identical submissions), Devonport, Birkenhead Point (Chelsea Sugar Refinery workers' cottages), Eden Terrace, Ponsonby, Grey Lynn, Northcote Point, Remuera, Epsom, and Sandringham.

Walkable catchment methodology challenge: Multiple inner-city submissions challenge whether their suburbs genuinely qualify for the walkable catchments that trigger SCA removal, arguing the 1200m catchment from the city centre edge is measured from inaccessible or non-pedestrian starting points (such as Westhaven boat ramp or the Strand port area) and does not reflect actual walking conditions.

Arguments in Support of SCA Removal

- SCA overlays suppress density in the areas with the best public transport access, pushing housing to poorly connected outer suburbs — an equity and planning efficiency argument made most forcefully by NZTA and HUD submissions.
- Heritage-motivated intensification can achieve good outcomes near transit.
- Some properties within SCAs have been substantially altered and have limited residual heritage value justifying the protection overhead.

- Character protections have been weaponised to prevent housing in the most accessible and infrastructure-rich parts of the city.

Māori Cultural Heritage

- Te Ākitai Waiohua seeks stronger SSMW protections, recognition of s.6(e) RMA as a qualifying matter, and inter-maunga viewshaft protections.
- Ngāti Whātua Ōrākei seeks recognition of ahi-kā status in central Tāmaki for consultation purposes.
- Te Poari o Kaipātiki ki Kaipara opposes natural hazard provisions as inconsistently applying cultural redress obligations.
- Tūpuna Maunga Authority supports viewshaft qualifying matters and seeks amendment to extend protection to maunga-to-maunga views.
- Ngāti Tamaoho argues hazard datasets for the Manukau Harbour are outdated and that overlays risk disproportionate impacts on marae, urupā, and Treaty settlement land.
- Waikato-Tainui seeks explicit Cultural Values Assessments where intensification occurs in areas of cultural significance.
- An Ōtara/Manukau submission raises cultural insensitivity of the intensification approach to Pacific and Māori communities.

Consensus Assessment

Near-unanimous opposition among heritage area residents and community groups to SCA reduction. The proportion of affected submitters opposing SCA removal is higher than for almost any other specific provision in PC120. The key planning division is between heritage advocacy (supported by the vast majority of affected residents) and housing supply imperatives (supported by development organisations and some policy advocates).

Theme 7: Environmental and Natural Hazards / Flood Risk

Frequency: 4,875 submissions (46.4% of analysed)

Position breakdown:

- Oppose: 2,714 (55.5%)
- Amend: 1,741 (35.6%)
- Support: 437 (8.9%)

Description and Relevant Provisions

PC120's resilience workstream generates two distinct and sometimes contradictory streams of submission: - **(a) Opposition to intensification in hazard areas:** Submitters argue PC120 insufficiently protects flood-prone, coastal, and erosion-prone land from intensification, or that intensification will worsen flood risk by increasing impervious surfaces. - **(b) Opposition to specific hazard mapping:** Submitters dispute the accuracy, methodology, or proportionality of flood, coastal inundation, coastal erosion, landslide, and overland flow path designations applied to their specific properties.

Relevant provisions include Chapter E36 (Natural Hazards and Flooding), ASCIE/CEHA/CIHA coastal erosion and inundation overlays, Appendix 24 (landslide hazard risk assessment methodology), flood plain qualifying matters with immediate legal effect under s.86B RMA, and climate modelling using the RCP 8.5/SSP5-8.5 scenario.

Balance of Opinion

On intensification in hazard areas (opposing further development): - Support for restricting intensification: approximately 45–55% of hazard-related submissions - Opposing intensification in hazard areas: strong majority position among residents in genuinely flood-affected areas

On specific hazard mapping (opposing designations): - Oppose/seek amendment to specific overlays: approximately 60–75% of submissions directly addressing mapping accuracy - Support hazard restrictions without qualification: approximately 10–15% - Accept principle but dispute application: approximately 20–25%

Arguments Supporting Hazard Restrictions

- The 2023 Auckland Anniversary Weekend floods and Cyclone Gabrielle demonstrated real and catastrophic consequences of development in hazard-prone areas.
- Intensification of flood-prone streets and catchments (Celtic Crescent, Dexter Avenue, Argo Drive, Harding Avenue, Pullum Street, Sandringham/Meola Catchment) will worsen already-severe flooding by increasing impermeable surfaces and stormwater runoff.
- PC120's own resilience objectives are internally contradicted when the highest-density zoning is applied to the most flood-prone corridors.
- Managed retreat from highest-risk areas is supported by multiple submitters who have experienced flooding.
- The Insurance Council of New Zealand (IAG, Suncorp, Westpac) strongly support hazard-based downzoning as reducing financial system exposure.

5. Geographic Analysis

Submissions with locality: 9,134 / 10,550 (86.6%)

Top 30 Localities by Submission Count

locality	count	%
Mt Eden	224.0	2.1
Herne Bay	217.0	2.1
St Marys Bay	210.0	2.0
Mt Albert	197	1.8
Remuera	186.0	1.8
Parnell	176.0	1.7
Epsom	165.0	1.6
Cockle Bay	155.0	1.5
Freemans Bay	154.0	1.5
Howick	150.0	1.4
Sandringham	107.0	1.0
Milford	105.0	1.0
Pukekohe	91.0	0.9
Takapuna	87.0	0.8
Waiuku	80.0	0.8
Birkenhead	77.0	0.7
Henderson	76.0	0.7
Ponsonby	68.0	0.6
Devonport	67.0	0.6
Glen Eden	61.0	0.6
Meadowbank	60.0	0.6
Papatoetoe	59.0	0.6
Point Wells	59.0	0.6
Te Atatu Peninsula	58.0	0.5
Chatswood	57.0	0.5
Bucklands Beach	53.0	0.5
Grey Lynn	52.0	0.5
St Mary's Bay	52.0	0.5

Position Distribution by Top 15 Localities (row %)

locality	amend	oppose	support
Herne Bay	5.1	93.1	1.8
St Marys Bay	1.9	97.6	0.5
Remuera	32.3	59.1	8.6
Parnell	41.5	55.7	2.8
Epsom	25.5	65.5	9.1
Mt Eden	24.4	70.5	5.1
Cockle Bay	13.5	85.2	1.3
Freemans Bay	9.7	90.3	0.0
Howick	12.0	85.3	2.7
Mt Albert	23.2	75.4	1.4
Sandringham	42.1	55.1	2.8
Milford	26.7	70.5	2.9
Pukekohe	33.0	60.4	6.6
Takapuna	28.7	67.8	3.4
Waiuku	10.0	87.5	2.5

Theme Profile by Top 10 Localities (% mentioning theme)

locality	Infrastructure Capacity	Traffic Congestion	Public Transport	Character & Amenity	Privacy / Sunlight / Shading	Building Height	Density Too High	Density Too Low	Environmental / Natural Hazards	Trees & Vegetation	Housing Supply & Affordability	Property Values	Community Facilities	Zoning (Specific)	NPS-UD Compliance	Process & Consultation	Natural Environment	Cultural Heritage	Resilience & Climate	Construction Impacts
Herne Bay	89.9	5.1	39.6	94.0	9.2	59.4	93.1	2.8	73.7	11.5	21.7	2.8	2.8	96.3	35.5	89.4	11.5	87.1	13.8	0.0
St Marys Bay	91.9	19.5	41.4	97.1	19.5	82.9	94.8	0.5	88.6	11.9	20.0	1.9	3.3	93.8	31.9	92.9	16.7	92.4	16.7	0.5
Remuera	54.8	38.7	38.7	62.4	30.6	44.6	66.7	20.4	43.5	21.5	47.8	15.6	15.6	72.6	29.6	36.0	9.7	19.9	17.7	4.3
Parnell	53.4	25.0	42.6	86.4	46.6	72.2	75.6	9.1	46.6	35.2	51.1	10.2	11.4	81.8	46.0	39.2	14.2	64.8	23.3	1.1
Epsom	52.7	41.8	35.2	81.2	29.1	40.6	64.8	13.9	30.3	32.1	38.8	13.9	21.8	73.9	27.9	22.4	17.0	33.3	14.5	2.4
Mt Eden	61.5	35.3	30.1	80.8	42.3	53.8	71.2	5.8	44.2	23.7	44.2	10.3	30.1	71.8	19.9	34.0	5.8	57.1	22.4	6.4
Cockle Bay	80.6	76.1	52.3	72.9	24.5	32.3	78.7	2.6	51.6	18.7	25.8	27.7	25.8	72.9	32.9	34.2	11.6	12.3	28.4	1.9
Freemans Bay	79.9	27.3	42.9	92.2	11.7	84.4	87.7	4.5	22.1	18.2	39.6	1.3	1.3	93.5	57.8	86.4	9.7	88.3	19.5	0.6
Howick	80.7	73.3	43.3	72.7	28.0	30.0	74.7	1.3	42.7	12.7	22.0	13.3	30.0	50.7	12.0	26.0	6.0	21.3	17.3	5.3
Mt Albert	43.0	45.8	34.5	83.1	50.0	67.6	77.5	2.1	27.5	39.4	36.6	23.9	27.5	81.7	39.4	31.0	5.6	47.9	15.5	7.0

6. Submitter Type Analysis

Count by Submitter Type

submitter_type	count	%
individual	7480.0	70.9
professional_agent	2523.0	23.9
organisation	540.0	5.1

Position Distribution by Submitter Type (row %)

submitter_type	amend	oppose	support
individual	0.5	26.9	67.0	5.5
organisation	0.0	55.4	37.0	7.6
professional_agent	0.0	29.1	64.4	6.5

Theme Emphasis by Submitter Type (% mentioning)

submitter_type	Infrastructure Capacity	Traffic Congestion	Public Transport	Character & Amenity	Privacy / Sunlight / Shading	Building Height	Density Too High	Density Too Low	Environmental / Natural Hazards	Trees & Vegetation	Housing Supply & Affordability	Property Values	Community Facilities	Zoning (Specific)	NPS-UD Compliance	Process & Consultation	Natural Environment	Cultural Heritage	Resilience & Climate	Construction Impacts
individual	55.6	40.8	31.6	56.7	24.5	35.9	61.8	7.0	45.1	16.1	27.6	14.4	15.2	60.0	16.8	34.8	9.1	21.3	24.0	3.2
organisation	44.3	19.8	33.0	39.3	14.3	37.4	36.9	29.6	64.1	18.9	52.2	11.3	14.3	80.0	52.4	52.4	13.9	18.1	50.4	3.1
professional_agent	52.0	41.9	34.5	51.8	21.7	33.3	57.0	15.0	45.9	17.0	34.4	14.6	16.9	65.8	23.1	33.7	8.0	14.1	27.9	3.0

7. Strategic Implications

Drawn from the executive briefing on submission directionality.

Part 1: Provisions Attracting The Most Opposition And Most Commonly Requested Changes

1.1 The 50-Metre Special Height Variation — Most Opposed Single Provision

The 50-metre (approximately 15-storey) height variation applicable near the city centre fringe and Ponsonby Road is the **most consistently and intensely opposed single provision** in the corpus. Opposition is concentrated in St Marys Bay, Freemans Bay, and Herne Bay, where coordinated community submissions reflect near-unanimous neighbourhood rejection. The concerns compound: extreme height incompatibility with 19th-century street fabric; sunlight and shading impacts quantified at the individual property level; heritage streetscape destruction in kauri-built Victorian and Edwardian precincts; and walkable catchment methodology challenges questioning whether these suburbs genuinely qualify for the transit proximity that triggers the provision.

Commonly requested change: Removal of the 50m variation or reduction to a maximum of 22–28 metres with mandatory step-down controls calibrated to street width and proximity to station core.

1.2 The 34.5-Metre Rapid Transit Height Provision — Procedural and Technical Challenge

The 34.5-metre (approximately 10-storey) height limit near specified rapid transit stations, particularly the Baldwin Avenue and Mt Albert stations added at the final legislative stage, attracts a specific and pointed objection: these stations were added **without Select Committee scrutiny**, and submitters argue this amounts to a procedural defect undermining the s.32 evaluation. This is likely to be taken seriously by the Panel as a matter of process integrity.

Commonly requested change: Independent assessment of these station catchments with public notification; height reduction to 6–8 storeys pending that assessment.

1.3 The Two-Million-Dwelling Capacity Target — Most Technically Contested Parameter

Hundreds of submissions — particularly from technically sophisticated inner-city submitters — challenge the validity of the two-million-dwelling target as the foundational justification for the scale of upzoning. The core arguments are:

- The target represents **130–200 years of theoretical capacity**, not a 30-year planning horizon
- Auckland's own 30-year demand projection of approximately 241,000 additional dwellings renders the target grossly disproportionate

- Existing AUP unbuilt capacity of approximately 900,000 dwellings has not been adequately credited
- The target misinterprets the Schedule 3C RMA obligation

If the Panel finds merit in these arguments, it would undercut the evidential foundation for the **geographic extent and intensity of upzoning** across the plan change as a whole — making this the highest-risk single point of legal vulnerability in PC120.

Commonly requested change: Recalibrate the target to a 30-year demand-responsive horizon; reduce walkable catchments from 1,200m to 800m (as recommended by Jan Gehl consultancy) or apply graduated catchment methodology.

1.4 Removal of Special Character Area Protections — Near-Unanimous Opposition Among Affected Residents

The reduction of Special Character Area (SCA) overlays — removing approximately 15,000–25,000 properties from heritage protection — generates the **highest rate of opposition relative to the number of directly affected submitters** of any specific provision in the corpus. The arguments extend beyond amenity preference to include:

- Alleged methodological deficiency in the desktop heritage survey (Google Street View reliance; focus on individual buildings over streetscape cohesiveness)
- Absence of adequate s.32 justification for specific removals
- Procedural breach of planning trust toward residents who invested in heritage restoration
- Treaty-related arguments invoking the ecological significance of kauri-built structures

The proportionality argument is particularly persuasive: SCA properties constitute 1–3% of residential land. Their protection would have **negligible impact on overall housing capacity** while preventing irreversible heritage loss.

Commonly requested change: Reinstatement of removed SCA properties; recommission the heritage survey using on-site methodology with streetscape assessment criteria; establish a transition provision for properties where individual integrity is lower but streetscape contribution remains significant.

1.5 Infrastructure Provisions — Most Broadly Held Concern

Infrastructure capacity is raised in **the majority of all substantive submissions** and is the most broadly held concern across every locality, zone type, and submitter category. Specific provisions that lack infrastructure assessment requirements attract direct criticism under RMA ss.5–7 grounds. The Army Bay/Whangaparaoa moratorium on new wastewater connections until at least 2031, Watercare's documented network

limitations, and the absence of a funded infrastructure upgrade programme are cited as making the plan change's implementation sequence fundamentally defective.

Commonly requested change: Either (a) infrastructure assessments as a precondition to rezoning taking effect (infrastructure triggers or sequencing provisions), or (b) explicit qualifying matter status for infrastructure capacity limitations with defined thresholds, or (c) staging provisions tying density increases to demonstrated network capacity upgrades.

Part 2: Provisions Attracting Broad Support — Retain As Drafted

The submission record reveals limited unconditional support, but several dimensions of PC120 are endorsed even by many submitters who oppose other aspects. Provisions that should be retained as drafted or strengthened include:

2.1 The Resilience/Natural Hazard Framework — Principle Broadly Endorsed

The **underlying principle** of restricting intensification in flood plains, coastal inundation zones, and landslide-susceptible areas attracts support from a majority of submitters engaging the resilience workstream, reinforced by the Insurance Council of New Zealand, the Natural Hazards Commission, and water-sector organisations. The 2023 Anniversary Weekend floods and Cyclone Gabrielle function as a powerful empirical anchor for this support. The **concept** of hazard-sensitive planning is not seriously contested; the disputes are about methodology, mapping accuracy, and the specific climate scenario (RCP 8.5) applied.

2.2 Transit-Oriented Intensification — Principle Supported by Significant Minority

The principle of concentrating density near rapid transit stations and frequent transit corridors is accepted by a meaningful minority of submitters — including housing advocates, developer submitters, professional planning agents, and some community organisations. The CRL investment rationale is accepted even by many who oppose specific height limits or geographic extent. This principle should be retained as the organising framework; the dispute is about implementation parameters, not the underlying transit-oriented rationale.

2.3 Walkable Catchment Methodology — Principle Accepted, Parameters Disputed

The use of walkable catchment distance as the trigger for higher-density zoning is accepted in principle by a wider set of submitters than the specific 1,200m distance or the measurement methodology. Retaining the catchment framework while recalibrating its parameters (distance, gradient adjustment, pedestrian accessibility) would address the most technically grounded objections without abandoning the policy logic.

2.4 Hazard Restrictions as Qualifying Matters with Immediate Effect

The use of s.86B to give immediate legal force to flood plain qualifying matters is supported by hazard-risk submitters, insurers, and infrastructure agencies. This mechanism — rather than leaving hazard restrictions subject to consent-based override — should be retained. The disputes about specific mapping boundaries do not undermine the appropriateness of the mechanism itself.

Part 3: Genuine Tensions And Trade-Offs In The Submission Record

The Panel will need to make explicit value judgements about several irreconcilable tensions that cannot be resolved by technical amendment alone.

3.1 Housing Capacity versus Natural Hazard Risk

PC120's own resilience objectives are internally in tension with its intensification objectives. Several submissions specifically identify streets and catchments where THAB or MHU zoning overlaps with flood plain or overland flow path overlays, producing a direct internal contradiction: the plan enables the most intensive development in some of the most hazard-prone corridors. This is not a fringe concern — it goes to the coherence of the plan change as a whole.

The trade-off is sharpened by the climate scenario: the RCP 8.5 scenario used for coastal inundation modelling represents a high-end emissions pathway, and applying it to downzone properties — with immediate legal effect — while simultaneously upzoning adjacent properties generates material equity and proportionality concerns. The Panel will need to determine whether the hazard restriction methodology is appropriately calibrated or whether it creates an inconsistent regulatory framework that unreasonably limits property rights on one side of a street while enabling tower development on the other.

3.2 Housing Supply versus Heritage Preservation

This is the plan change's most politically charged trade-off and the one least amenable to technical resolution. The strongest version of the supply argument — that SCA protections suppress density in Auckland's most transit-accessible, infrastructure-rich, and walkable suburbs, effectively using heritage designation as a tool of exclusion — has genuine planning merit. The strongest version of the heritage argument — that SCA properties are globally rare, collectively irreplaceable, constitute 1–3% of residential land, and their intensification would contribute negligibly to overall housing supply — also has genuine planning merit.

The submission record suggests a potential resolution space: **retaining SCA overlays on properties with verified streetscape contribution while enabling greater density on SCA-adjacent properties and within SCAs on demonstrably compromised sites** — but this requires a higher-quality heritage survey than the

desktop methodology used to justify current SCA removals. Whether the Panel will direct a supplementary survey or make decisions on available evidence is a significant process question.

3.3 Infrastructure Timing versus Housing Urgency

The infrastructure timing tension is the most practically consequential trade-off in the plan change. Two legitimate but contradictory propositions both have empirical support:

- **Infrastructure must precede intensification:** Existing networks cannot manage current demand; intensifying ahead of infrastructure upgrades will produce environmental harm (sewage overflows, flooding) and human safety risks (emergency access failure, school overcrowding) with costs borne disproportionately by existing residents.
- **Infrastructure investment follows population concentration:** Infrastructure agencies invest where population already exists or is projected to grow; without upzoning, the population signals that justify network investment will not arise; rezoning must lead, not follow.

PC120's deliberate exclusion of infrastructure assessment from its scope is its greatest process vulnerability. The Panel cannot resolve this tension through plan provisions alone, but it can recommend infrastructure staging conditions, qualifying matter thresholds, and sequencing obligations that create a more defensible implementation framework.

3.4 Urban Density Benefits versus Peripheral Community Constraints

The plan's application of intensification rules to outer suburban and rural communities — Waiuku, Warkworth, Gulf Harbour, Whangaparaoa, Glenbrook, Red Beach — where public transport is minimal, infrastructure is constrained, and the transit-oriented rationale simply does not apply, represents a distinct tension from the inner-city debates. These communities generate opposition that is less about heritage or character and more about **the fundamental mismatch between the plan's transit-catchment logic and the physical reality of their locations**. If the plan's justification for intensification is transit accessibility, applying it to areas with no meaningful transit service requires a separate and distinct justification that the plan change currently does not provide.

STRATEGIC SUMMARY FOR ADVISORS

Area	**Submission Direction**	**Implied Action**
50m height variation	Near-unanimous opposition	Reduce or remove; graduated controls
34.5m station heights (Baldwin/Mt Albert)	Strong opposition + procedural challenge	Sever for additional evidence
Two-million-dwelling target	Widespread technical challenge	Commission independent review; may require recalibration
SCA removals	Near-unanimous opposition from affected residents	Pause pending supplementary survey
Infrastructure sequencing	Virtually universal concern	Staging or qualifying matter thresholds
Hazard mapping accuracy	Widespread but site-specific disputes	Directed mediation; systemic climate scenario review
Transit-oriented density principle	Broad in-principle acceptance	Retain framework; amend parameters
Hazard restriction principle	Broad support	Retain; strengthen enforceability

The overall directionality of feedback is not simply "anti-development." It is a demand for a **more targeted, evidence-based, infrastructure-sequenced, and heritage-sensitive plan** that retains the transit-oriented intensification framework while abandoning the blanket geographic application, the unsupported capacity target, and the inadequately justified heritage survey outcomes that currently define PC120's most contested provisions.

This briefing is based on synthesised submission themes and positions. It does not constitute legal advice. Specific provisions should be reviewed against s.32 evaluations and applicable NPS-UD and RMA requirements before any amendment decisions are made.

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8. Synthesis Verification

Cross-checking major claims from the LLM-generated synthesis and executive briefing against computed statistics.

Claim: "68–75% opposing, 15–22% amendment, 5–10% support"

- Oppose: 6,840 (64.8%) — **OUTSIDE** claimed range
- Amend: 3,048 (28.9%) — **OUTSIDE** claimed range
- Support: 614 (5.8%) — **WITHIN** claimed range

Verdict: The synthesis significantly overstated opposition (64.8% vs claimed 68–75%) and understated amendment-seeking (28.9% vs claimed 15–22%). This likely reflects the LLM conflating "amend" submissions with outright opposition.

Claim: "SCA removals: near-unanimous opposition from affected residents"

- cultural_heritage theme mentions: 2,055
    - oppose: 1,481 (72.1%)
    - amend: 401 (19.5%)
    - support: 173 (8.4%)

Verdict: Opposition rate 72.1% — weaker than claimed with "near-unanimous". Combined oppose + amend = 91.6%.

Claim: "Infrastructure: most broadly held concern"

- infrastructure_capacity rank: #4 of 20 themes
- Count: 5,713 (54.4% of analysed)
- Top theme: zoning_specific (6,579)

Verdict: Ranked #4 — top 5 but not #1. Broadly consistent, though zoning_specific and density_too_high rank higher.

Claim: "50m height: most consistently opposed single provision"

- building_height theme mentions: 3,735
    - oppose: 2,637 (70.6%)
    - amend: 952 (25.5%)

    - support: 146 (3.9%)
- Submissions mentioning '50m' in specific_provisions: 522
    - oppose: 397 (76.1%)
    - amend: 114 (21.8%)
    - support: 11 (2.1%)

Verdict: Among submissions specifically mentioning 50m, 76.1% oppose. Consistent with claim of concentrated opposition.

Claim: "Transit-oriented principle: broad in-principle acceptance"

- public_transport theme mentions: 3,413
    - oppose: 1,570 (46.0%)
    - amend: 1,119 (32.8%)
    - support: 724 (21.2%)

Verdict: Support + amend = 54.0% — consistent with "broad acceptance".

9. Appendix: Data Sources & Methodology

Available upon request.

File	**Description**
output/datasets/submissions.csv	Tidy submission-level dataset (one row per submission)
output/datasets/themes.csv	Tidy theme-level dataset (one row per submission-theme pair)
output/pc120_analysis.csv	Raw LLM analysis output
output/pc120_prepass.csv	Regex pre-pass extraction results
output/pc120_submissions.csv	Original submission metadata from council
output/pc120_synthesis.md	LLM-generated qualitative thematic synthesis
output/pc120_directions.md	LLM-generated executive briefing
output/pc120_stats_report.md	Statistical EDA report with full tables
output/pc120_final_report.md	This consolidated report

Data & Methodology

Pipeline

The analysis followed a four-stage pipeline:

1. **PDF text extraction** — pdftotext -layout converted 10,559 submission PDFs to plain text
2. **Regex pre-pass** — pattern matching extracted structured fields (position, submitter type, address, decision sought) from standard-form submissions
3. **LLM analysis** — Claude classified themes, positions, and extracted metadata for each submission using tailored prompts (with regex-extracted fields where available)
4. **Vision analysis** — scanned/image-based PDFs were processed via multimodal vision

Analysis Source Breakdown

analysis_source	count	%
regex+llm	7240.0	68.6
llm	2665.0	25.3
vision	595.0	5.6
regex_only	43.0	0.4
skipped	7.0	0.1

Submission Type Breakdown

submission_type	count	%
standard_form	7311.0	69.3
other	2209.0	20.9
email_attachment	690.0	6.5
form5	333.0	3.2
withheld	4.0	0.0
withdrawn	3.0	0.0

Missing Data Rates

field	empty	%
overall_position	48.0	0.5
summary	50.0	0.5
submitter_type	7.0	0.1
locality	1416.0	13.4
specific_provisions	2538.0	24.1
decision_sought	873.0	8.3
wishes_to_be_heard	7.0	0.1
property_address	3028.0	28.7

Text Length Distribution

- Min: 0
- 25th percentile: 2425
- Median: 3420
- 75th percentile: 6711
- Max: 17965617
- Mean: 15982