Proposed Plan Change 120: Housing Intensification and Resilience (PC120)

to the Auckland Unitary Plan (Operative in part)

SECTION 32 AND SCHEDULE 3C OF THE RESOURCE MNAGEMENT ACT 1991 FOR QUALIFYING MATTER:

COHESIVE ZONING RESPONSE

EVALUATION REPORT

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Executive Summary

1. The following report addresses the evaluation required by Section 32 and Schedule 3C of the Resource Management Act 1991 (**RMA**). It relates to final mapping work undertaken to achieve a '*Cohesive Zoning Response*', as a qualifying matter (**QM**).

2. This is a logical and inherent part of any mapping exercise, to undertake a refinement process following GIS output. The QM is used to justify a more logical and cohesive zone application where intensification responses have upzoned properties and other qualifying matters may require lower intensity residential zone response within area subject to clause 4(1)(b) or (c) of Schedule 3C of the RMA and the implementation of policy 3 of the National Policy Statement on Urban Development (**NPS-UD**). The scale and significance of the issues are assessed as being medium.

3. The reduction in development capacity and potential on identified sites is relatively minimal, affecting less than 1% of properties within Policy 3 areas. Controls are applied only to the extent necessary to accommodate the qualifying matter and is consistent with the NPS-UD and the purpose of the RMA.

4. This Section 32 evaluation report supports the application of the Cohesive Zoning Response as a qualifying matter under Proposed Plan Change 120 (**PC120**) to the Auckland Unitary Plan (Operative in Part). The qualifying matter addresses irregular or fragmented zoning patterns that emerged from initial GIS-based mapping, particularly within areas subject to intensification under clause 4(1)(b), (c) of Schedule 3C of the RMA 1991 and Policy 3 of the NPS-UD.

5. The Cohesive Zoning Response is applied solely through spatial mapping and does not introduce new provisions. It aims to improve the legibility, consistency, and integrity of zoning patterns by reducing the occurrence of ad-hoc or isolated zone outcomes (such as spot zonings) where they conflict with surrounding lower-intensity zones or qualifying matters.

6. Three implementation options were evaluated:

    - Option 1: No mapping refinement following initial GIS outputs (do nothing)
    - Option 2: Mapping refinement applied in a highly restricted manner.
    - Option 3: Mapping refinement applied critically, to remove all anomalies/ad-hoc patterns.

7. Option 3 is preferred for its effectiveness in supporting a well-functioning urban environment, improving plan usability, and enhancing public confidence. While it may result in a small number of sites being downzoned, this is limited to the extent necessary to accommodate the qualifying matter and is consistent with the purpose of the RMA and the objectives of the NPS-UD.

8. The evaluation also considers the risk of acting or not acting under Section 32(2)(c) of the RMA. Not acting poses greater risks to planning coherence and neighbourhood character. Acting through the more comprehensive mapping refinement mitigates these risks and supports better environmental, social, and economic outcomes.

Introduction

9. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the Resource Management Act 1991 (**RMA**) for proposed Plan Change 120: Housing Intensification and Resilience (**PC120**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).

10. The background to and objectives of PC120 are discussed in the overview report, as is the purpose and required content of section 32 and Schedule 3C evaluations.

11. This report discusses the implications of applying a 'cohesive zoning response' as a qualifying matter to the requirements of clause 4(1)(b) and (c) of Schedule 3C of the RMA and the implementation of policy 3 of the National Policy Statement on Urban Development 2020 (**NPS-UD**) (also referred to in this report as "**Clause 4(1)(b), (c) and Policy 3 areas**"). While undertaking a refinement of initial zoning applied through GIS work is a logical and necessary step to the mapping process – this has been included as a QM for transparency of zoning applications within Clause 4(1)(b), (c) and Policy 3 areas.

12. This QM is limited to application of zoning within the plan maps and does not include new provisions.

13. The Council may make the relevant building height or density requirements of clause 4(1)(b) and (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD less enabling of development in relation to an area within any zone in an urban environment only to the extent necessary to accommodate 1 or more of the following qualifying matters that are present:

    (a) a matter listed in section 77I(a) to (i) of the RMA;

    (b) <u>any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the National Policy Statement on Urban Development 2020 (**NPS-UD**), inappropriate in an area but only if subclause (4) of clause 8 of Schedule 3C is satisfied</u>.

14. In this case, this qualifying matter is considered an "other" qualifying matter in accordance with Clause 8(1)(b) of Schedule 3C of the RMA, as it is not a matter expressly listed in section 77I(a) to (i) of the RMA.

15. Under clause 8(2) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(a) or (1)(b) of clause 8:

    (a) demonstrate why the Council considers:

        (ii) that the area is subject to a qualifying matter; and

        (iii) <u>that the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) or policy 3 for that area for that area; and</u>

    (b) assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and

(c) assess the costs and broader impacts of imposing those limits.

16. Under clause 8(4) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must, in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(b) (an "other" qualifying matter), must also:

    (a) identify the specific characteristic that makes the level of development specified by clause 4(1)(b) or (c) or policy 3 inappropriate in the area; and

    (b) justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and

    (c) include a site-specific analysis that—

        (i) identifies the site to which the matter relates; and

        (ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and

        (iii) evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) or policy 3 while managing the specific characteristics.

Integrated evaluation for qualifying matters

17. For the purposes of PC120, evaluation of the 'cohesive zoning response' as a qualifying matter has been undertaken in an integrated way that combines section 32 and Schedule 3C of the RMA requirements. The report follows the evaluation approach described in the **Table 1** below.

18. The preparation of this report has involved the following:

    - Assessment of the AUP(OP) to identify any relevant provisions that apply to this qualifying matter
    - Review of the AUP(OP) Maps to assess the spatial application of this qualifying matter
    - Section 32 options analysis for this qualifying matter and related amendments.

19. The scale and significance of the issues is assessed to be medium.

20. This section 32/Schedule 3C evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

Table 1: Integrated approach for any matter specified in section 77I(a) to (i) that is not currently operative in the AUP and any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD, inappropriate in an area.

Standard Section 32 steps	Evaluation steps of Clause 8 of Schedule 3C of RMA
Issue **Define the problem- provide overview/summary providing an analysis of the qualifying matter**	Identify whether an area is subject to a qualifying matter and describe the qualifying matter.
Identify and discuss objectives / outcomes	Identify relevant RPS / district level objectives and policies. Describe why the Council considers that 1 or more qualifying matters apply to the identified areas, and whether the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD for that area. "Other" QM additional requirement: Justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.
Identify and screen response options	Consider a range of reasonably practicable options for achieving the objectives including alternative standards or methods for these areas having considered the particular requirements in clause 4(1)(b) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD and assess the efficiency and effectiveness of the provisions. "Other" QM additional requirement: Site-specific analysis that evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter.
Collect information on the selected option(s)	Assess the impact that limiting development capacity, building heights or density (as relevant) will have on the provision of development capacity. "Other" QM additional requirement: Site-specific analysis that evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause

	4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD while managing the specific characteristics.
Evaluate options – costs for housing capacity	Assess the costs and broader impacts of imposing those limits on development capacity.
Evaluate option(s) - environmental, social, economic, cultural benefits and costs	Provide an assessment of the benefits and costs of the options in the light of the new objectives introduced by the NPS-UD relating to well-functioning urban environments.
Selected method / approach	Describe how the preferred approach to implementing the qualifying manner is limited to only those modifications to the extent necessary to accommodate the qualifying matter; and how the qualifying matter is applied.
Overall judgement as to the better option (taking into account risks of acting or not acting)	Conclusion as to the implications of the qualifying matter for development capacity to be enabled by NPS-UD in the areas where the qualifying matter applies.

Issues

21. Initial GIS mapping of zone changes based on specific 'rules' for the zoning application of other qualifying matters can unintentionally produce ad-hoc or fragmented zoning outcomes due to its data-driven nature and lack of an overall lens. A review or "fix" process is a necessary step of the mapping process, to ensure zoning aligns with planning principles.

22. Within clause 4(1)(b) or (c) or policy 3 intensification areas, these unusual zoning patterns occur at the interface of some sites zoned THAB (modified)[1] and those areas where a qualifying matter (or matters) apply a lower intensity residential zone[2] to all or most sites around it.

23. An example of this issue occurs within the walkable catchment of four eastern Rapid Bus Stations shown in **Figure 1** below, where the presence of multiple QMs with varying zone response results in spot zoning and ad-hoc zone patterns within the catchment area. Figure 1 illustrates multiple instances of small pockets of 10-storey THAB surrounded by Single House Zone; Mixed Housing Suburban Zone or Mixed Housing Urban Zone, as well as other zone interface issue.

[1] A modified THAB zone is proposed as part of PC120. THAB is the principal zone applied to relevant residential land within clause 4(1)(b) or (c) or policy 3 areas (unless modified by QMs). Height Variation controls (HVCs) indicate where height is varied from standard provisions. In clause 4(1)(b), (c) or policy 3 areas, heights of 50m and 34.5m are enabled through HVC's. The operative 5-storey expectation of the zone is replaced with a standard 6-storey (22m) height enablement across the zone (unless HVC apply). This is a major change.
[2] Being Single House Zone; Mixed Housing Suburban Zone or Mixed Housing Urban Zone.

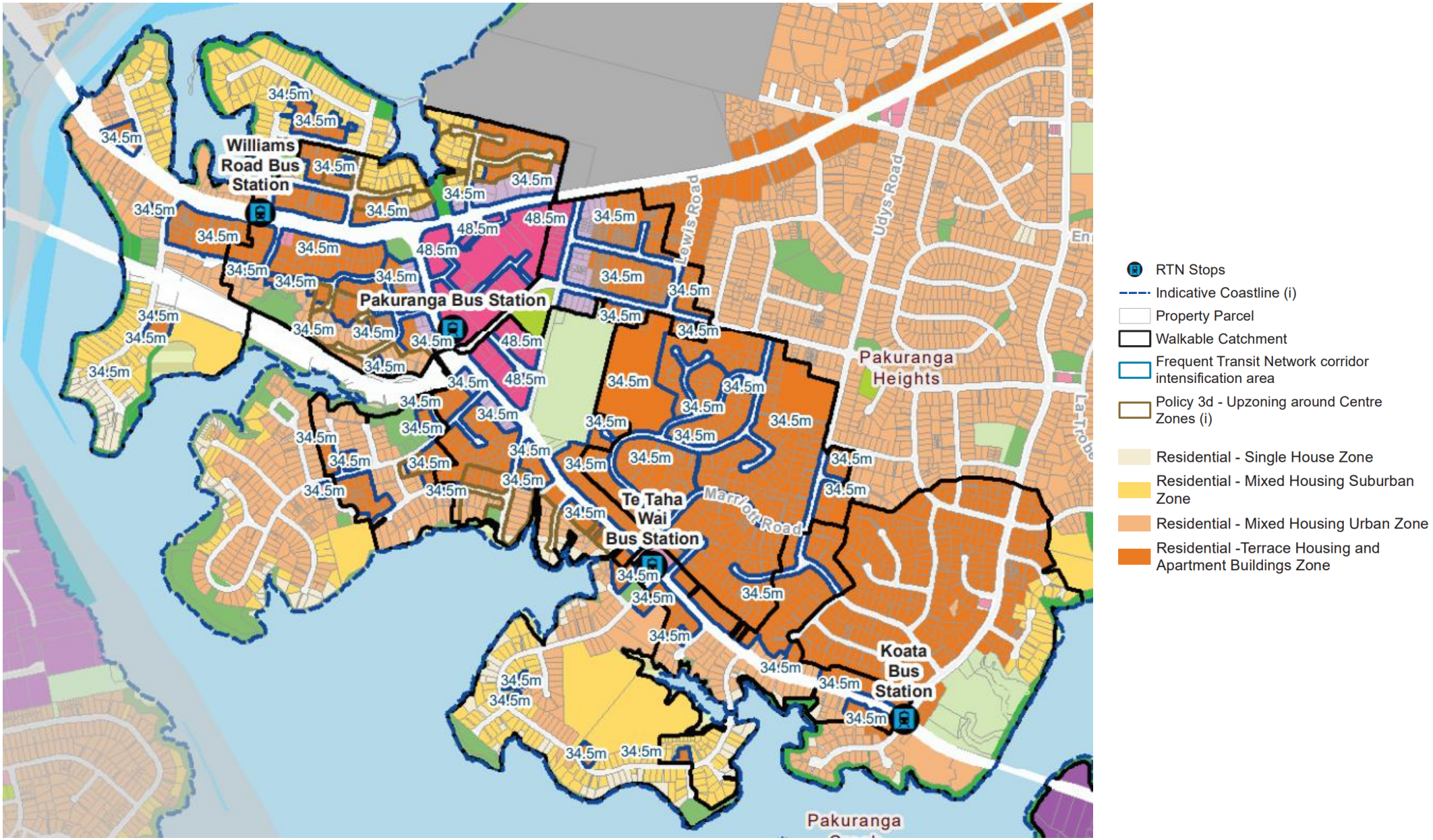

Figure 1. Illustration of fragmented zoning - Walkable Catchments of Williams Road; Pakuranga; Te Taha Wai and Koata Bus stations along Tamaki River Coastline, Mapping as of 21 August 2025.

24. Mapping work to consolidate zoning patterns and address ad-hoc or fragmented zoning will be less enabling of heights and densities otherwise required by clause 4(1)(b), (c) or (d). As this may affect required capacity enablement in certain areas and therefore is evaluated as a qualifying matter.

25. This zoning refinement is limited to spatial mapping and does not affect text of the AUP(OP). This process would apply to all areas subject to minimum requirements for residential height and density enablement (as specified by clause 4(1)(b), (c) and (d) of Schedule 3C of the RMA).

26. This cohesive zoning issue applies across the region; however, this evaluation report is limited to clause 4(1)(b), (c) and Policy 3 areas. Cohesive zoning work undertaken outside of these areas are described further in the Section 32 evaluation Report on "Implementation of intensification directions from Resource Management Amendment Act (2025) and Policy 3 of the National Policy Statement – Urban Development."

27. This matter is not expressly provided for in section 77I(a) to (i) of the RMA and is an "other" qualifying matter in accordance with Clause 8(1)(b) of Schedule 3C of the RMA.

Why is a cohesive zoning pattern necessary?

28. Zoning is the foundation of planning systems in many developed countries and has been used in New Zealand since 1926. Zoning is a planning tool used to organise activities or manage environmental effects in a defined spatial area.

29. The basic purpose of the zoning mechanism is to provide for the grouping or co-location of compatible uses and for the separation of incompatible uses. Zoning is a relatively blunt tool that works best over larger areas and areas where values can be clearly defined.

30. Where two different zonings adjoin each other, it is referred to as a zone boundary. The exact location of a zone boundary can be difficult to determine with certainty, as the boundary is a sharp cut-off and does not take into account any gradual variation in values that may exist. Therefore, zones tend to be applied relatively broadly to a contiguous area of sites that can be a neighbourhood or suburb, and generally at least align to a road edge or a block boundary.

31. Fundamentally, zoning is not a method intended to be applied on a site-by-site basis but rather applied to larger cohesive areas.

32. Where a zone of a specific property differs from those of the surrounding area, it is referred to as a 'spot zoning'. Generally, spot zonings are discouraged as they can lead to inconsistent or haphazard development, disrupting the intended order and balance of the zoning method[3].

[3] It is noted that there are types of '*spot zoning*' that are generally accepted in the New Zealand planning system. However, these do not actually change the zoning of the site itself. Rather, the zoning can be overridden by tools such as site-specific precincts and designations of sites for public works.

Guidance on zoning during the hearings for the Unitary Plan stated that a 'best practice' approach to zoning included the following:

- Zone boundaries need to be clearly defensible e.g. follow roads where possible or other boundaries consistent with the purpose of the zone.
- Zone boundaries should follow property boundaries.
- Generally, no "spot zoning" (i.e. a single site zoned on its own)[4]

Objectives and Policies (existing)

33. The AUP(OP) contains various mechanisms to manage land use, development and subdivision. Under the AUP(OP) zones manage how areas are used, developed, or protected, including what can be built and how high. The spatial application of zones is intended to identify where similar uses and activities are anticipated. Zones are applied in conjunction with overlays and precincts, which may modify or override zone rules. Designations are another form of enabling certain development rights outside of zoning.

34. As the principals that support a cohesive zoning response sit within best planning practice on the application of zones there are no specific objectives and policies of the AUP to be referred to. However, the objectives and policies for all zones rely on the logical spatial application of the zone to ensure the planned outcomes can be realised.

35. With regard to the Regional Policy Statement (**RPS**), zoning must give effect to the RPS, including objectives for urban form, infrastructure integration, and hazard management. Logical application of zoning is critical to facilitate a well-functioning urban environment, a key outcome of the RPS and NPS-UD.

Development of Options

36. Section 32 of the RMA requires an examination of the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA.

37. The overall objective (purpose of the proposal) of PC120 is to ensure the intensification responses are applied in the most efficient manner, managing the interface with qualifying incompatible with the level of development provided by. Section 32 requires a range of options to be considered.

38. In addition, as the cohesive zoning response is a qualifying matter that is "any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3" inappropriate, a site-specific analysis is required that evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD, while managing the specific characteristics.

39. In this case, a team of planners have reviewed the application of different zoning responses and the resulting GIS zone outputs across the region and within areas subject to clause 4(1)(b) or (c) or Policy 3. This initial review observed varying levels of zoning fragmentation and

[4] Independent Hearings Panel, *Interim Guidance - Best practice approaches to re-zoning, precincts and changes to the Rural Urban Boundary (RUB),* 31 July 2015

identified different options for mapping refinement – centred around key principles for the cohesive zoning response.

40. As a result, the three options that have been evaluated in the section 32 and Schedule 3C assessment of the cohesive zoning response qualifying matter are:

    - **Option 1: No mapping refinement following initial GIS outputs (Do nothing)**

      Retain the GIS-generated zoning patterns without adjustment, including any irregular or fragmented outcomes (e.g. isolated high-density zones surrounded by lower-density areas as illustrated in **Figure 1** above).

    - **Option 2: Mapping refinement applied in a highly restricted manner**

      Apply refinement only where zoning irregularities are most pronounced and clearly undermine plan readability or administrative coherence, such as a single isolated THAB-zoned sites within a larger area of Single House zoning.

    - **Option 3: Mapping refinement applied critically, to remove most anomalies/ad-hoc patterns**

      Implement a methodical review of GIS outputs to identify and correct most zoning anomalies across the plan area, ensuring zoning patterns are spatially coherent and aligned with planning principles. This approach recognises there are some properties that may retain a “spot” zoning, to maintain the integrity of zoning applied through qualifying matters (e.g., flooding). This would require a team of planners to review mapping across the region, overlapping to ensure consistency in the approach.

41. Another option considered to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or Policy 3 of the NPS-UD was to identify specific locations where zoning irregularities are most pronounced and assess whether adjustments to the other qualifying matters that led to this outcome could be made to better align the zoning outputs. This approach was highly complex, introduced significant uncertainty, and risked undermining the integrity of the assessments undertaken for each other qualifying matter. This approach carried uncertainty and did not guarantee improved zoning coherence. For these reasons, final mapping refinement is undertaken following application of all zone responses and other qualifying matters through the GIS-based zoning process.

Evaluation of options

42. To determine the most appropriate method to implement the cohesive zoning response as a qualifying matter, each of the options needs to be evaluated in the context of the objectives and policy 3 of the NPS-UD. This is included in **Table 2**.

Table 2: Evaluation of options to implement mapping refinements through

Qualifying matter	Option 1 – No mapping refinement following initial GIS outputs (Do nothing)	Option 2 - Mapping refinement applied in a highly restricted manner	Option 3 – Mapping refinement applied critically, to remove most anomalies/ad-hoc patterns
Costs			
Costs of applying QM – housing supply / capacity	None – No potential for further downzoning because of this QM.	Limited effect on housing capacity – downzoning may only be applied to most pronounced examples that clearly undermine plan readability.	Greater effect on capacity of the three options, however, still results in only a small number of required changes - not wholesale downzoning as a result of a more coherent approach to zoning.
Costs: Social	High – spot-zoning and ad-hoc zone patterns undermine planned character across an area, this has potential to affect cohesion within a neighbourhood, with varying and potentially incompatible forms of development. Ad-hoc zoning patterns could undermine public confidence in AUP.	Limited refinement may leave some communities with inconsistent or unclear zoning outcomes.	Potential public concern over perceived changes to zoning entitlements.
Costs: Economic (not otherwise covered by housing capacity issues)	Moderate – fragmented zoning patterns can lead to uncertainty of zone outcomes and unintended consequences on land values.	Potentially increasing long-term costs for council and developers due to misaligned zoning patterns relative to the planned outcome of the zone.	Some may consider a lost development opportunity as a cost. However, in most cases the upzoning was never actually applied – but rather simply one step in a process to develop he most appropriate zoning outcomes.
Costs: Environmental	Inconsistent zoning outcomes have poor integration with planned outcomes, affecting compatibility of land uses, adverse bulk and location effects between incompatible zones.	Benefits may be unevenly realised, as limited refinement could leave some fragmented zoning patterns intact.	Less environmental costs compared to benefits.
Benefits			
Benefits of applying the QM - social	Minimal social benefit gained – may preserve perceived development entitlements on isolated sites or groups of sites.	Improving zoning clarity in areas where anomalies are most visible, helps to reduce confusion for communities and build public confidence in the AUP.	Zoning patterns are clear, consistent, and predictable across the plan area, which improves public understanding of the AUP. Supports equitable treatment of properties, and enhances community confidence in the planning framework

Qualifying matter	Option 1 – No mapping refinement following initial GIS outputs (Do nothing)	Option 2 - Mapping refinement applied in a highly restricted manner	Option 3 – Mapping refinement applied critically, to remove most anomalies/ad-hoc patterns
Benefits - economic	No staff resourcing required for refinement process. Might have some level of additional development enablement in "spots" of higher intensity zoning. However, there would be uncertainty through the consenting process due to predominance of lower intensity zone in immediate surrounding environment.	Supports moderate economic benefits by improving zoning coherence in key areas with less staff resourcing and time compared to option 3.	Improved integrity of zone outcomes providing more certainty to developers/and residents/and consenting staff administering the plan.
Benefits – environmental	Limited – theoretically supports compact development as this QM focuses on Clause 4 and Policy 3 areas, where an isolated THAB parcel might develop.	Moderate environmental outcomes, by focusing on the most significant contrast of zone "islands" to achieve better zone cohesion.	Best environmental outcomes, with more comprehensive way to uphold integrity of relevant zones through improved zone boundaries.

Analysis

43. Three options were assessed for refining zoning patterns following GIS outputs. Option 1 (no refinement) is the least effective, leading to fragmented zoning and reduced plan coherence. Option 2 (targeted refinement) improves clarity in key areas but leaves some inconsistencies. Option 3 (systematic refinement to remove most zone anomalies) provides the most balanced and effective outcome, supporting clear zoning, better environmental integration, and greater certainty for communities and developers. Option 3 is the preferred approach as it best supports the plan's objectives for a well-functioning urban environment.

Risks of acting or not acting.

44. Under Section 32(2)(c) of the RMA, the evaluation considers the risks associated with acting or not acting in the face of uncertain or insufficient information. While some uncertainty exists in applying the cohesive zoning response, the risk of not acting – leaving fragmented or ad-hoc zoning patterns poses greater threats to plan coherence, neighbourhood character, and public confidence in the AUP(OP). The preferred approach (systematic refinement) mitigates these risks by improving zoning clarity and consistency.

Effectiveness and efficiency

45. Option 3 which attempts to address most zoning anomalies within Clause 4(1)(b), (c) and Policy 3 areas is assessed as the most effective and efficient method. It delivers the highest net benefit by supporting a well-functioning urban environment, enhancing zoning legibility, and providing more certainty for communities and developers. While this option may involve

a small level of downzoning, this is justified by the improved integrity and usability of the planning maps.

Description of how the qualifying matter is to be implemented

46. The qualifying matter is implemented through a spatial mapping exercise to improve readability of the planning maps and zone cohesion. Mapping refinement is to be undertaken as a separate and final step following the GIS-based zoning process. This allows for the integration of multiple qualifying matters and the application of a consistent, plan-wide approach (referred to as the cohesive zoning response) to support a well-functioning urban environment.

47. The refinement process is to be critically applied to ensure only a small amount of land is downzoned within these Policy 3 areas. The cohesive zoning response involves downzoning isolated or small groups of a higher intensity residential zone (THAB, MHU or MHS) to match the surrounding lower intensity zoning (exampled in **Figures 2** and **3**, below). This ensures a more consistent and legible zoning pattern, supporting effective plan implementation.

Figure 2. Example of the downzoning of THAB sites surrounded by Single House sites.

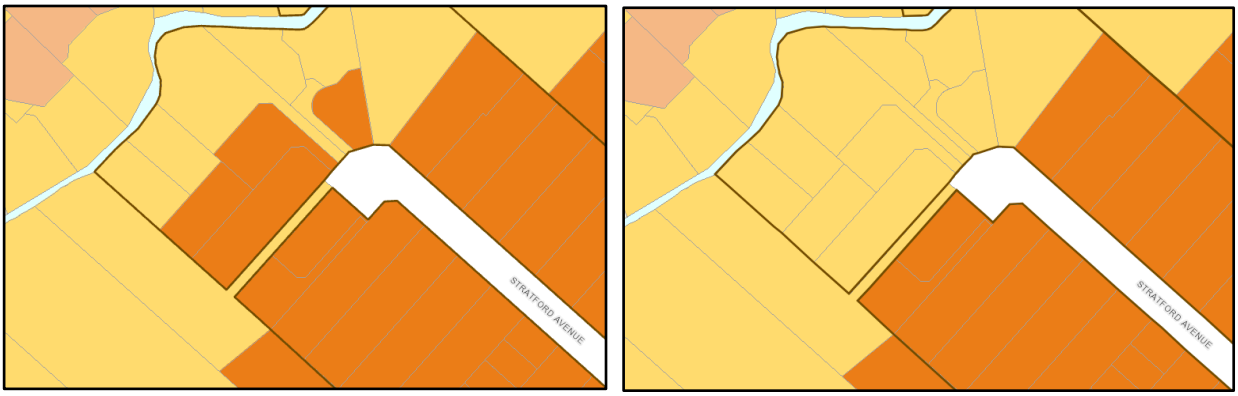

Figure 3. Example of the downzoning of THAB sites surrounded by Mixed Housing Suburban Zone.

48. Importantly, this response does not override the application of other qualifying matters. Sites that have been downzoned due to a constraint are not upzoned through this process.[5] Consequently, in instances where a constraint applies to only one site (and not to adjacent properties), the resulting zoning pattern may remain inconsistent. An example of this is illustrated in **Figure 4**, showing where individual or small pockets of single house zone remain due to a flooding constraint. To achieve a uniform zoning pattern in these types of cases would require either the upzoning of properties affected by the flooding qualifying matter, or a large amount of downzoning of the surrounding area. Neither option is supported by the cohesive zoning Option 3 (Mapping refinement applied critically, to remove most anomalies/ad-hoc patterns). Therefore, irregular zoning outcomes such as this can remain in some areas, despite the cohesive zoning response.

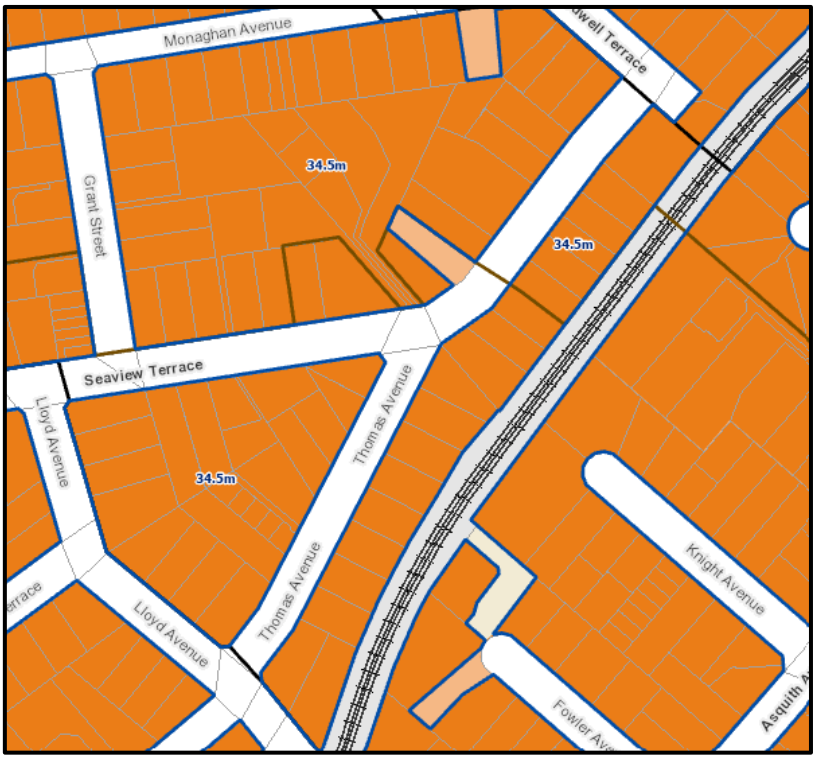

Figure 4. Mixed Housing Urban and Single House Zone remains within Policy 3 areas due to a flooding constraint.

Consequences for development capacity

49. The application of the cohesive zoning response as a qualifying matter may result in a reduction in development capacity in certain areas, notably where fragmented or ad-hoc zoning patterns are refined to improve spatial coherence. This involves downzoning isolated or small clusters of higher-intensity residential zones (e.g. THAB, MHU, MHS) to match surrounding lower-intensity zones (that are impacted by other qualifying matters).

50. While this may limit building height or density in specific locations, the impact on overall development capacity is considered appropriate and proportionate. The refinement is applied only to the extent necessary to accommodate existing qualifying matters and does not override

[5] Note that the cohesive zoning response can further downzone a property already impacted by another qualifying matter (e.g. from Mixed Housing Suburban to Single House).

them. Following the cohesive zoning approach of the preferred option (Option 3), the zoning of approximately 761 properties has been adjusted within policy 3 areas. This represents less than 1% of all properties within Policy 3 areas. Importantly, the approach does not result in wholesale downzoning, and the integrity of capacity enablement under clause 4(1)(b), (c) of Schedule 3C and Policy 3 of the NPS-UD is maintained.

Overall conclusion

51. The application of the cohesive zoning response as a qualifying matter addresses irregular and fragmented zoning outcomes that result from site-specific constraints and initial GIS-based mapping. The specific 'rules' for the zoning application of other qualifying matters can unintentionally produce ad-hoc or fragmented zoning outcomes due to its data-driven nature and lack of an overall lens. These anomalies, such as isolated pockets of higher-intensity zoning surrounded by lower intensity zones, can undermine the integrity and legibility of the planning framework.

52. By implementing a more critical mapping refinement process, the Council will improve the legibility, consistency, and integrity of zoning patterns by reducing the occurrence of ad-hoc or isolated zone outcomes (such as spot zonings) where they conflict with surrounding lower-intensity zones or qualifying matters. The zoning patterns will be more spatially coherent, defensible, and aligned with best practice planning principles. This approach supports a well-functioning urban environment, improves plan usability, and enhances public confidence in the zoning framework.

53. The zone refinement from the cohesive zoning response is limited to the extent necessary to accommodate qualifying matters and does not undermine their application. It is consistent with the purpose of the RMA and the objectives of the NPS-UD and is assessed to be the most appropriate method to achieve the intended planning outcomes.

Information Used

Name of document, report, plan	How did it inform the development of the plan change
AUP maps	Identifies the extent of zoning
GIS Analysis	For implementation of initial zoning response and identification of property numbers.

Consultation summary

1. The First Schedule to the RMA sets out the relevant consultation requirements

Limited consultation on PC 120 has been undertaken, and this is detailed in the Auckland Council September 2025 reports entitled:

> CONSULTATION AND ENGAGEMENT ON A PROPOSED PLAN CHANGE POTENTIALLY REPLACING PROPOSED PLAN CHANGE 78 – INTENSIFICATION SUMMARY REPORT
>
> MĀORI ENGAGEMENT CONSULTATION SUMMARY REPORT