



Proposed Plan Change 120: Housing Intensification and Resilience

to the Auckland Unitary Plan (Operative in part)

**Section 32 and Schedule 3C of the Resource Management Act 1991
qualifying matter:**

Comprehensive Integrated Planning Outcomes

EVALUATION REPORT

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Executive Summary

1. This report evaluates the application of the Comprehensive Integrated Planning Outcomes (**CIPO**) as a qualifying matter under Section 32 and Schedule 3C of the Resource Management Act 1991 (RMA), in the context of Proposed Plan Change 120 (PC120) to the Auckland Unitary Plan (Operative in Part) (**AUP**). The CIPO qualifying matter is intended to safeguard precincts that have undergone significant planning and investment, ensuring that further intensification does not undermine their integrated outcomes.
2. The key objectives of PC120 are contained in Section A of this report, managing significant risk from natural hazards and managing housing growth providing for intensification in a way that complies with clause 4 of Schedule 3C of the RMA. However, in eight identified precincts—Beachlands South, Drury 1, Drury 2, Drury Centre, Flat Bush, Long Bay, Waihoehoe, and Wainui—further intensification is deemed inappropriate due to the presence of complex servicing arrangements, bespoke planning frameworks, and integrated infrastructure delivery mechanisms.
3. The report assesses two options: (1) not applying the CIPO qualifying matter, and (2) applying it in a targeted manner. Option 2 is preferred, as it maintains the integrity of existing precinct planning while aligning with the objectives of the NPS-UD. The impact on development capacity is minor, as most precincts already enable intensification consistent with Policy 3.
4. The application of the CIPO qualifying matter ensures that Auckland's urban growth is managed in a way that respects existing planning investments, supports well-functioning environments, and avoids unintended consequences from blanket intensification.

Introduction

5. 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 (**PC120**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
6. The background to and objectives of PC120 are discussed in the s32 Residential Overview, as is the purpose and required content of section 32 and Schedule 3C evaluations.
7. The report makes up **Section B** of the Combined Precincts Overview Report and discusses the implications of applying the Comprehensive Integrated Planning Outcomes as a qualifying matter to the requirements of clause 4(1)(b) of Schedule 3C of the RMA and the implementation of policy 3 of the NPS-UD. This qualifying matter will not result in the addition of any new provisions as a part of PC120.
8. 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 one or more of the following qualifying matters that are present:
 - (a) a matter listed in section 77I(a) to (i) of the RMA;
 - (b) 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.
9. 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) 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; and
 - (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.
10. 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), 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

11. For the purposes of PC120, evaluation of the Integrated Planning Outcomes 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 below.
12. 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
 - Consideration of each precinct relative to the purpose of the qualifying matter, if further intensification would undermine the integrated planning and significant investment into the precinct and if a Policy 3 location was located within the precinct and therefore qualified for the application of the qualifying matter
 - review of the AUP(OP) to identify all relevant precincts and markup corresponding provisions to integrate the application of this qualifying matter
 - section 32 options analysis for this qualifying matter and related amendments
13. The scale and significance of the issues is assessed to be minor.
14. 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 sec 32 steps	Plus clause 8Schedule 3C steps
Issue Define the problem- provide overview/summary providing an analysis of the qualifying matter	Proposed PC120 will result in widespread zoning changes in addition to significant changes to most zone provisions (objectives, policies, rules), which could have the impact of modifying and conflicting with many of the existing precincts bespoke outcomes. Precincts provide for the recognition of opportunities and constraints of a certain location and can work to better align infrastructure servicing with land use development, often providing a framework for multiple parties to deliver integrated outcomes for communities across complex environments. Some of the precincts across Auckland are large or complex in terms of the planned area, integrated outcomes and intertwined objectives policies and methods for delivery such as infrastructure servicing agreements. As such if the proposed PC120 was applied to these precincts, it would have the effect of undermining the integrated planning and significant investment undertaken in these areas. PC120 therefore proposes to apply the Comprehensive Integrated Planning Outcomes (CIPO) qualifying matter to eight precincts that are located within the Auckland urban environment. The specific precincts are: • Beachlands South • Drury 1 • Drury 2 • Drury Centre • Flat Bush • Long Bay • Waihoehoe • Wainui • Wairaka
Identify and discuss objectives / outcomes	The RPS objectives and policies that are specific to Comprehensive Integrated Planning Outcomes as a qualifying matter are set out in the AUP Chapter B2 and B3. The district- level objectives policies and rules are set out in Chapter I precincts within each individual precinct. The Comprehensive Integrated Planning Outcome as a qualifying matter is identified under section 77O(j) of the RMA, being any

	other matter that makes higher density as provided for by Policy 3 inappropriate in an area (but only if RMA section 77L is satisfied). The qualifying matter is not spatially represented on the planning maps but will simply be applied to certain precincts. This will have the effect of not applying any further intensification through the proposed PC120. Each precinct has been assessed relative to the level of development that it currently provides and the effect of not applying the intensification of the proposed PC120.
Identify and screen response options	A range of reasonably practicable options for achieving the objectives have been identified and evaluated for this qualifying matter. • Option 1- do nothing, do not apply the CIPO qualifying matter, • Option 2- apply the CIPO qualifying matter in a reduced manner (based on a precinct level analysis). Option 2 would also include downzoning within precincts impacted by natural hazards. Refer to the national hazards s32 for further detail. A high-level analysis of each precinct has been undertaken which evaluates the level of intensification under the AUP relative to that which might be enabled through proposed PC120. The details of this are contained within Section A.
Collect information on the selected option(s)	The qualifying matter is not always compatible with the level of development provided by clause 4(1)(b) or Policy 3. The level of incompatibility depends on the location of the precinct. A comprehensive list of precincts subject Policy 3 (c) areas and analysis are provided in Appendix A. A summary is provided as follows. <i>Walkable catchment of Drury metropolitan centre and Drury train station (Policy 3 (c))</i> • Analysis completed for these walkable catchments (refer s32 Intensification) did not identify this location for additional height beyond 6 storeys. Intensification is consistent with Policy 3 (c) is already enabled in this location.

	<i>Areas within Policy 3(d) locations – heights and densities commensurate with the level of business activity and community services</i> • There are six precincts that contain town or local centres, these centres have been considered as a part of the analysis for intensification around town or local centres, however none of the centres contained within the precincts qualified for additional intensification beyond what they already provide for. For further detail on intensification adjacent to centres refer to s32 Intensification. • In many instances the centres within the precincts contain zoning or height variation controls (HVCs) around the centres that enable a level of intensification that aligns with the minimum 6 storeys or 22m of Policy 3 (c). In addition to the CIPO qualifying matter some of the precincts will also be subject to down zoning as a result of natural hazards, the specific locations for this have also been noted in Appendix A. The detailed rationale for the application of the down zoning is contained within the s32 Natural Hazards.
Evaluate options – costs for housing capacity	The cost of imposing limits on housing capacity by identifying the CIPO as a qualifying matter is minor. As has been outlined many of the precincts that contain Policy 3 areas already contain intensification that aligns with the minimum 6 storeys or 22m of Policy 3. In any case none of the centres or walkable catchments were identified for intensification beyond that which is already enabled in the precinct.
Evaluate option(s) - environmental, social, economic, cultural benefits and costs	Identifying the CIPO as a qualifying matter provides both costs and benefits, which vary across the two options identified above. Each option has costs, with Option 2 having the lowest overall costs for the introduction of the qualifying matter. Refer to Table 2 for more details. The intent of the introduction and application of the qualifying matter is to recognise those locations across Auckland that have undergone significant planning and investment and already contain objectives policies and methods that provide for the creation of a well-functioning environment. As such there is a need for the creation of this qualifying matter to ensure these locations are not impacted and unintended consequences created as a result of the application of further intensification through proposed PC120 in these locations.

Selected method / approach	The extent of the qualifying matter would apply only to those identified precincts. As such the qualifying matter would be limited to the spatially represented extent of the precinct boundaries already mapped and contained within the AUP.
Overall judgement as to the better option (taking into account risks of acting or not acting)	The implications of the qualifying matter on the development capacity to be enabled by Policy 3 in the areas where the qualifying matter applies are minor. By virtue of the implementation of the CIOP qualifying matter this safeguards those precincts that have already undergone comprehensive planning and contain integrated objectives, policies and methods to be delivered by complex servicing agreements. The precincts already contain appropriate levels of intensification and are designed to deliver well-functioning environments with infrastructure integrated throughout. Without this qualifying matter, the intent and outcomes sought in these locations may be in conflict with any further changes through the proposed PC120. The characteristics of the CIOP qualifying matter make the level of development sought by Policy 3 in appropriate in the light of the national significant of urban development and the objectives of the NPS-UD.

Issues

15. The qualifying matter being evaluated is for Comprehensive Integrated Planning Outcomes (CIPO). The purpose of which is to limit changes within specific precincts that have already undergone comprehensive planning and have planned density that relies on complex servicing arrangements for triggering and integrating infrastructure contributing to integrated outcomes across the precinct(s).
16. The use of precincts as a planning tool within the AUP is widespread across the Auckland region. Precincts have been implemented to better define and direct bespoke outcomes for a certain location.
17. Precincts provide for the recognition of opportunities and constraints of a certain location and can work to better align infrastructure servicing with land use development, often providing a framework for multiple parties to deliver integrated outcomes for communities across complex environments.
18. Proposed PC120 will result in widespread zoning changes in addition to significant changes to most zone provisions (objectives, policies, rules), which could have the impact of modifying and potentially conflicting with many of the existing precincts bespoke outcomes.
19. The changes in zoning and addition of intensification in these locations may result in unintended consequences and a disconnect between the intent of the precincts and the outcomes that may eventuate.
20. The CIPO as a qualifying matter is identified under section 77O(j) of the RMA, being any other matter that makes higher density as provided for by Policy 3 inappropriate in an area (but only if RMA section 77L is satisfied). The qualifying matter is proposed to apply to the entirety of selected precincts and so is not limited to residential zoned land. A comprehensive list of precincts that the qualifying matter would apply to has been included in **Section A**.
21. By virtue of the implementation of the CIPO qualifying matter this safeguards those precincts that have already undergone comprehensive planning and contain integrated objectives, policies and methods to be delivered by complex servicing agreements. The precincts already contain appropriate levels of intensification and are designed to deliver well-functioning urban environments with infrastructure integrated throughout. Without this qualifying matter, the intent and outcomes sought in these locations may be in conflict with any further changes through the proposed PC120. The characteristics of the CIPO qualifying matter make the level of development sought by policy 3 inappropriate in the light of the national significance of urban development and the objectives of the NPS-UD.

Objectives and Policies (existing)

The relevant AUP objectives and policies, that support the Comprehensive Integrated Planning Outcomes qualifying matter are as shown below in table 2:

Table 2 Relevant AUP Objectives and Policies

AUP Chapter	Objective / Policy	Summary of matter addressed
Chapter B Regional Policy Statement	Urban Growth and Form Objectives B2.2.1 (1, 1A, 2, 4, 5) Policies B2.2.2 (4)	The relevant urban growth and form objectives and policies focus on the creation of a well-functioning urban environment with a quality compact urban form that primarily concentrates urban growth within the urban area ¹ , town and rural and coastal towns and villages.
Chapter B Regional Policy Statement	Residential Growth Objectives B2.4.1 (1, 1A, 3, 4) Policies B2.4.2 (1, 3, 4, 5 (c), 8)	The relevant residential growth objectives and policies focus intensification that contributes to a well-functioning environment and support quality compact urban form, providing for limitations of intensification where qualifying matters provide justification for this. Intensification is to be focussed in those areas with access to quality public transport, close to centres and large social and educational facilities and in those locations appropriate for the residential character of the area. Housing capacity and a range of housing choices is to be increased through maintaining a range of residential zones across the region. Infrastructure is to be integrated and sequenced with growth. To achieve this place- based planning tools are recognised as the method by which existing and planned neighbourhood character is provided for and assist with delivering well-functioning environments.
Chapter I Precincts	Refer to each precinct contained within Section A for the place-based Objectives and Policies.	

¹ Urban Area 2016 defined in appendix 1A of Chapter B of the AUP

22. The Comprehensive Integrated Planning Outcomes qualifying matter aligns with the objectives and policies of the Regional Policy Statement, limiting further intensification in locations and directing intensification in the most appropriate locations supporting a well-functioning urban environment. Another aspect of a well-functioning environment is the sequencing and integration of infrastructure with growth. The objectives and policies recognise the use of place-based tools in the AUP to provide for existing and planned neighbourhood character, while also providing a framework to sequence and deliver growth in line with infrastructure provision. The CIPO qualifying matter will also maintain a range of residential zones across the region in so far as a large portion of these precincts contain lower intensity zones while PC120 responds to intensification through greater areas of higher intensity zones.
23. Generally, this qualifying matter has been applied to precincts where comprehensive integrated planning has been undertaken. The precincts contain complex and integrated objective, policies and methods that are tied to existing density controls and infrastructure servicing arrangements or triggers. As such the exclusion of these precincts through the application of the qualifying matter making these locations 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 maintains the integrity and bespoke outcomes sought in these locations. A precinct-by-precinct approach and detailed rationale for why the qualifying matter applies to each precinct is contained within **Section A**.

Development of Options

24. 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. The overall objective (purpose of the proposal) of PC120 is contained within the overall s32. Section 32 requires a range of options to be considered.
25. In addition, as the Comprehensive Integrated Planning Outcomes qualifying matter 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", 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.
26. Each precinct proposed to have the qualifying matter applied has been outlined in Appendix A, this includes overview and analysis of the characteristics and bespoke outcome sought from each precinct and the implications of applying proposed PC120.
27. The two options that have been evaluated in the section 32 and Schedule 3C assessment of the Comprehensive Integrated Planning Outcomes qualifying matter are:

- **Option 1:** do nothing, do not apply the CIPO qualifying matter
- **Option 2:** apply the CIPO qualifying matter in a reduced manner (based on a precinct level analysis).

Consequences for development capacity

28. The consequences for the provision of development capacity by accommodating the CIPO qualifying matter are minor. As is outlined in Appendix A, many of the precincts that contain Policy 3 areas already contain intensification that aligns with the minimum 6 storeys or 22m of Policy 3. In any case none of the centres or walkable catchments were identified for intensification beyond that which is already enabled in the precinct.

Evaluation of options

29. To determine the most appropriate response for CIPO 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.

Table 3 Evaluation of options

Qualifying matter	Option 1	Option–2
Costs		
Costs of applying QM – housing supply / capacity	Undermines the comprehensive planning and bespoke outcomes sought from the locations. Undermines the specific servicing arrangements to deliver the precincts based on specific density controls for the areas.	No discernible cost to capacity given majority of the precincts already enables the minimum required by Policy 3. Impact of wider zoning principles on residual land unlikely to make a discernible change from AUP zoning within precincts.
Costs: Social	Potentially provides for housing in unsustainable locations. Reduces housing choice across Auckland through reducing areas of mixes in higher and lower intensity zones.	Missed opportunity for precincts excluded to respond to changes in community needs.
Costs: Economic (not otherwise covered by housing capacity issues)	Undermines the significant investment already taken place in these locations and the complex servicing arrangements often involving third parties. Potential to result in misalignment of infrastructure provision. Significant investment of time and resource to 'unpick' each complex precinct.	Missed opportunity to reassess zoning and housing provision within precincts to test and respond to shifts in local demand.
Costs: Environmental	Inappropriate levels and locations of intensification might occur in locations that already include complex environmental controls to drive environment outcomes.	Missed opportunity to better respond to environmental considerations within each precinct where not aligning with current outcomes of the precinct.

Qualifying matter	Option 1	Option–2
	Broadens scope of the plan change.	
Benefits		
Benefits of applying the QM - social	Delivers intensity Auckland wide providing for more residences, however the extent is indiscernible to option 2.	Maintains the integrity of the precincts within the AUP framework while still responding to the creation of a well-functioning urban environment. Maintains consistency with the Regional Policy Statement providing for housing choice across Auckland, while concentrating intensification in the most sustainable locations.
Benefits - economic	Where increased intensification occurs, possibly more efficient use of infrastructure.	Maintains the integrity of existing servicing and third-party agreements to deliver integrated infrastructure precinct wide. Continues to align intensification with existing significant investment within the precincts.
Benefits – environmental	Possible to better align environmental controls and outcomes within the precinct where increased intensification occurs.	Allows for a targeted approach to consideration of specific precincts, particularly where comprehensive planning related to environmental outcomes has occurred.

Analysis

30. Overall **option 2** to apply the Comprehensive Integrated Planning Outcomes qualifying matter to a selection of precincts is preferred. While this option may result in some missed opportunities to make changes within the precincts to respond to changes since they became operative, there are significant benefits to preserving the areas in their current form and maintaining the outcomes initially sought.
31. While option 1 provides opportunity to respond and make change, there are significant disbenefits in the implementation of proposed PC120 in the precincts that the qualifying matter would apply to.

Risks or acting or not acting.

32. The risks of not applying the CIPO qualifying matter and proposed PC120 applying to these areas is that changes in the underlying zoning may result in unintended consequences and a misalignment between the intended outcomes of each precinct outcomes (implemented through objectives, policies, methods). This includes misalignment with infrastructure, both planned and delivered.

Effectiveness and efficiency

- 33. Option 2 provides for a proportionate response, avoiding time and resource ‘unpicking’ complex precincts, many of which the objectives policies and methods are all reliant on one another to deliver broader social, economic and environmental outcomes. This option also minimises the scale and scope of change within proposed PC120.
- 34. Option 1 would successfully respond to the need to deliver intensification across Auckland; however, it would be a timely exercise to apply proposed PC120 across all the precincts.

Description of how the qualifying matter is to be implemented

- 35. The qualifying matter will be implemented by excluding those precincts that it would apply to in entirety from proposed PC120. The qualifying matter will not be represented spatially on the maps; its exclusion will be delineated by the precincts boundaries that already exist under the AUP and intensification proposed through PC120 zoning would not be applied. This would also include any changes in zoning patterns that may occur through the implementation of the wider Auckland zoning principles for residual land. Down zoning would however be applied wherever natural hazards impacted the precincts.

Overall conclusion

- 36. The evaluation undertaken for the Comprehensive Integrated Planning Outcomes (CIPO) qualifying matter demonstrates that its application is both necessary and appropriate to safeguard the integrity of precincts that have undergone significant planning and investment. These precincts contain bespoke objectives, policies, and infrastructure servicing arrangements that are designed to deliver well-functioning urban environments.
- 37. Applying the CIPO qualifying matter ensures that further intensification proposed under (PC120) does not undermine the integrated and bespoke outcomes of each precinct. The analysis contained in Appendix A confirms that the level of development already enabled within the identified precincts aligns with the minimum requirements of Policy 3 of the National Policy Statement on Urban Development (NPS-UD).
- 38. Option 2—applying the qualifying matter in a targeted, precinct-specific manner—is the preferred approach. It provides a proportionate and efficient response that maintains the integrity of existing planning frameworks while still supporting Auckland’s broader urban development goals. This approach also avoids the risks associated with misalignment of infrastructure and unintended planning outcomes that could arise from applying PC120 without consideration of the precincts’ unique contexts.
- 39. In conclusion, the implementation of the CIPO qualifying matter is justified under Section 32 and Schedule 3C of the Resource Management Act 1991 and supports the delivery of a coherent, sustainable, and well-integrated urban form across Auckland.

Information Used

Name of document, report, plan	How did it inform the development of the plan change
AUP maps	Identifies the extent of each precinct
AUP Precinct text	Detailing the exact objectives, policies and methods associated with each precinct
GIS Analysis	To determine extent of Policy 3 areas and any underlying zone change

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