

Submission on Plan Change 120 and proposed amendments to Plan Change 120

Schedule 3C Clause 10E(2) of Schedule 1, Resource Management Act 1991



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 16, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

My details

Full name of person making submission

Organisation name (optional)

Agent full name (optional)

Address for service

Email is the primary contact. Record your email address, or the agent's email address if an agent is acting on your behalf. Provide your postal address here if you do not have an email.

Contact phone number

Postal address

You may wish to provide your postal address if your email address is the address for service

Submission details

This is a submission to:

Plan Change Number PC 120, including proposed amendments

Plan Change Name Housing Intensification and Resilience

My submission relates to

Choose Option 1 or Option 2

(Option 1) This is my only submission on PC 120

☐

Or

(Option 2) This is an additional submission on PC 120 because I want different or additional decisions made on PC 120 to the decisions I requested in my first submission. I am not repeating my first submission.

☐

My first submission number is: _____

To find your submission number, visit Auckland Council PC 120 website and scroll down to click on View the plan change submission or [Find my plan change submission](#)

I understand

- the council may not record any decisions I request in this submission repeated from my first submission
- that different or additional decisions I now request may conflict with the decisions I requested in my first submission, and this does not invalidate any submission.

My submission is

I seek the following decision from the Council on the plan change and the proposed amendments

Tell us the maps and words in PC120 you would like to keep, amend or delete. If your submission is about a specific property, tell us the address. Don't tell us your reasons here. For guidance on making an effective submission visit Auckland Council PC 120 website or [PC 120 website](#)

My Submission

This submission relates to the Flood Plain and Coastal Inundation hazard overlays applied to Gulf Harbour under PC120, and the consequential natural hazard and zone changes and Land Information Memorandum (LIM) notations arising from those overlays. The submitter's overarching concern is that the hazard overlays currently rely on regional, non-site-specific modelling for the Flood Plain, rather than site-specific analysis that reflects Gulf Harbour's as built environment and, in the case of Coastal Inundation, an internally inconsistent climate change and sea level rise.

Submission Point 1: Flood Plain – Gulf Harbour

Decision sought

Amend the Flood Plain overlay as it applies to Gulf Harbour by requiring that the extent and classification of the Flood Plain be verified through detailed, site-specific hydrologic and hydraulic modelling.

Pending completion of that assessment:

1. Amend PC120 to identify the Gulf Harbour Flood Plain overlay as requiring further site-specific verification; and
2. Review and, where necessary, amend the Flood Plain overlay and associated natural hazard provisions for Gulf Harbour following completion of that verification.

Reasons

- The Flood Plain extent is derived from the Rural Rapid Flood Hazard Assessment (RRFHA), applied to the 1% annual exceedance probability (AEP) event. The RRFHA is, by design, a rapid, regional screening-level method intended to identify areas warranting further investigation – it is not a site-specific hydraulic model and is not intended to be a final determinant of flood extent, depth or hazard classification at an individual-property scale.
- As a screening tool, the RRFHA relies on simplified catchment and conveyance assumptions. In Gulf Harbour's case, it does not appear to account for the performance of the existing, purpose-built Gulf Harbour stormwater system, which was specifically engineered to manage catchment runoff for this development. Omitting the performance of established stormwater infrastructure from the hazard model is likely to materially overstate both the extent and depth of flooding modelled for the area
- The Council's own RRFHA methodology documentation states: *This model uses a rain on grid approach and no detailed hydrological modelling has been conducted. As a result, there may be discrepancies in modelled results compared to detailed hydraulic and hydrological models and observed storm events. Therefore it is recommended to verify the results of this model against manual calculations or a detailed model when assessing flood risks at specific areas of concern.*
- Because RRFHA outputs are now being applied under E36 to determine activity status, hazard classification, zone changes and LIM notations for individual Gulf Harbour properties – consequences well beyond the tool's original screening purpose – the level of technical rigour applied to the underlying model should be proportionate to those consequences. A regional

screening tool is not, on its own, an adequate basis for property-specific regulatory outcomes of this significance.

- The rainfall inputs to the RRFHA reflect Auckland Council's standardised climate change guidance (GD15, under Te Tāruke-ā-Tāwhiri), which directs projects to adopt a statistically downscaled projection of 3.8°C warming (RCP8.5 at 2110).

This assumption is not without controversy at the national level. In his July 2026 letter to mayors and council chief executives, the Minister for Local Government and Climate Change, Simon Watts, criticised councils for defaulting to high-end, "retired" scenarios such as RCP8.5, stating that they should not automatically be treated as the central or most likely planning assumption, given the costs this imposes on ratepayers.

This submission does not ask the panel to resolve that wider policy debate. It is raised only to establish that the 3.8°C input is a contestable planning assumption, not a fixed scientific fact — which matters because the narrower issue before the panel is how that already-contestable output is then applied. Specifically, this submission is confined to the fitness of the RRFHA methodology for the site-specific, property-level regulatory purpose to which it is now being put — in particular, its exclusion of existing stormwater infrastructure.

Submission Point 2: Coastal Inundation – Gulf Harbour

Decision sought

Amend PC120 and its supporting documentation to:

1. Clearly identify the climate change scenario, sea level rise assumption and forecast year.
2. Publicly explain and reconcile differences between the Coastal Inundation mapping shown in PC120 and the Auckland Council Flood Viewer.
3. Ensure the Coastal Inundation overlay is supported by clear and consistent documentation regarding assumptions, methodology and forecast period.

Reasons

- The PC 120 Map Viewer identifies all properties in the 1 per cent annual exceedance probability (AEP) plus 2m sea level rise area as Coastal Inundation (i). The Auckland Council Flood Viewer, which maps the coastal inundation for the same area uses a 1% AEP plus 1m sea level rise. Two Council-facing tools showing materially different inundation extents for the same location, without a clear public explanation of why the bases differ, undermines confidence in which figure is intended to be the operative planning basis and makes it difficult for affected property owners to understand their actual risk exposure.
- It is possible that the two figures serve legitimately different purposes – for example, a lower, more frequent design-standard figure for stormwater infrastructure purposes versus a higher, precautionary figure for a long-lived hazard overlay. If so, that rationale is not evident from the publicly available PC120 material and should be explicitly stated in the plan change documentation, consistent with the request in Submission Point 3.

- The Ministry for the Environment's 2024 Coastal Hazards and Climate Change Guidance updated national practice from the previous RCP-based scenario framework to five scenarios derived from the IPCC's Sixth Assessment Report (SSP1-2.6M, SSP2-4.5M, SSP3-7.0M, SSP5-8.5M and SSP5-8.5H+), and incorporates the NZ SeaRise programme's localised sea level rise projections, which account for vertical land movement specific to each stretch of coastline rather than relying on a generic global curve.

Submission Point 3: Natural Hazard and Zone Changes of Gulf Harbour Properties

Decision sought

Following the reassessment sought in Submission Points 1 and 2:

1. Review the Flood Plain and Coastal Inundation overlays applying to Gulf Harbour.
2. Review any associated natural hazard classifications.
3. Review any consequential zoning, precinct, overlay or planning map provisions.
4. Amend PC120 maps and provisions as necessary.

Reason

- To ensure the final documentation supporting both assessments clearly states: the climate change scenario adopted (by name – e.g. RCP8.5 or the relevant SSP pathway); the associated sea level rise and/or rainfall uplift figures; and the forecast year(s) to which those figures apply – so the basis is transparent and consistent across all Council hazard-mapping tools, including the Flood Viewer and PC120 GeoMaps layers.
- Where hazard overlays form the basis for zoning or development restrictions, any material change to those overlays should be reflected in the associated planning maps and provisions to ensure that regulatory controls remain proportionate to the identified hazard."

I request PC 120 (and/or proposed amendments) is

- ☐ Approved
- ☐ Approved with the changes I requested
- ☐ Declined

Attend a hearing

- ☐ I wish to be heard in support of my submission
- ☐ I do not wish to be heard in support of my submission
- ☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing

Declaration

I declare I could/could not gain an advantage in trade competition through my submission

- ☐ Could
- ☐ Could not

Are you directly affected by an effect discussed in this submission

- Are you directly affected by an effect discussed in this submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

- ☐ Yes
- ☐ No

- I acknowledge by taking part in this public submission process that my submission **(personal details including names and addresses will be made public)** as required by law
- I acknowledge that the council may use AI to assist with reviewing and summarising submissions

Signed: _____

Date: _____