

SUBMISSION ON

Auckland's Future Housing Plan - Plan Change 120

19 December 2025

To: Auckland Council

Name of Submitter: Horticulture New Zealand

Supported by: Pukekohe Vegetable Growers Association,
Potatoes NZ, Tomatoes NZ

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Executive Summary
- 3 Part 3: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Auckland Council for the opportunity to submit on Plan Change 120 and welcomes any opportunity to continue to work with Auckland Council and to discuss our submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

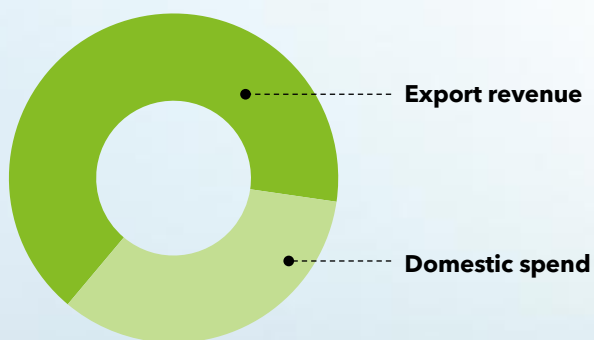
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Industry value \$7.54bn
Farmgate value \$4.89bn
Export revenue \$4.99bn
Domestic spend \$2.55bn

Source: HortNZ Annual Report 2025

HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Executive Summary

Horticulture is a critical component of Auckland's regional economy and New Zealand's national food supply. The Pukekohe growing hub, with its unique soils and favourable climate, supports year-round production of a diverse range of vegetable and fruit crops. The Auckland region contains approximately **7,600 ha of horticultural land**, including **almost 5,000 ha in commercial vegetable production** and **extensive indoor growing facilities**, making it essential for domestic food security. Many operations also function across the Auckland-Waikato boundary, highlighting the integrated nature of the production system.

Nationally, horticulture faces increasing pressure from rising production costs, labour shortages, compliance burdens and weather-related disruptions. Ensuring food security requires strategic planning that protects highly productive land, enables sustainable land use, and acknowledges interactions between housing policy, land availability, and domestic food supply.

Growers are already adapting to climate change through improved water storage, irrigation efficiency and use of Crop Protection Structures (CPSs), which help mitigate extreme weather impacts and support year-round production. Policy settings must allow these adaptation practices to continue.

HortNZ has concerns regarding PC120's hazard framework, addressing flood, coastal and climate-related risks. However, in principle, it supports using a risk management matrix that categorises hazards and activity sensitivity.

HortNZ's concerns regard the reliance on **high-risk climate scenarios (RCP 8.5)** and **coarse flood modelling**, which may not represent the best available information. These inaccuracies increase uncertainty and impose unnecessary costs on growers. HortNZ recommends modelling improvements, including processes to incorporate data from building consents into hazard maps.

HortNZ supports horticulture as a permitted activity in hazard zones but seeks clearer provisions for essential structures such as **Crop Protection Structures** and **Crop Support Structures** (e.g., kiwifruit canopies), which do not impede flood flows and are vital for production.

Finally, HortNZ emphasises the integral importance of **on-site post-harvest facilities**. These facilities ensure food safety and help to achieve supermarket product freshness requirements by minimising time between harvest and processing.

Overly burdensome consent requirements in hazard zones risk undermining growers' ability to maintain efficient operations. A more enabling approach in medium- and low-risk zones would maintain safety while reducing cost and uncertainty.

Submission

1. Horticulture in Auckland

The Auckland region is an important part of the national food production system. The Pukekohe growing hub plays a critical role in the domestic supply of vegetables to support the population of New Zealand.¹

There are approximately 7602ha of horticultural land in the region; of this, 4946ha are in commercial vegetable production and 848,000 m² of indoor greenhouse production.² There is a large degree of diversity in crops produced, with horticultural operations producing onions, potatoes, kiwifruit, avocado, leafy vegetables, brassicas, lettuce, pumpkin and carrots.

The Auckland region plays a critical role in the national domestic supply of fruit and vegetables. The unique soils and climate provide an ideal climate for year-round growing. Māori have had a long history of cultivation, with Pukekohe recognised as a key productive area that supported a robust economy with crops being traded with other communities outside the region.³ Auckland still maintains a high degree of crop diversity with a climate that is ideal for growing a wide range of horticultural crops.⁴

There are a large number of cross-boundary interactions with Waikato Region where many Pukekohe vegetable growers also have some of their operations.

2. National issues and Auckland horticulture

2.1. Food security

The Paris Agreement⁵ speaks to a 'fundamental priority of safeguarding food security' and action in a manner that does not threaten food production. Food security is a nationally important issue which needs to be addressed at a strategic level. We have a national food producing system that relies on growing vegetables and fruit in pockets of highly productive land (HPL), with good climate and access to freshwater.

The price of NZ grown fresh fruit and vegetables has been steadily increasing. This can be attributed to labour shortages, increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs.⁶ Enabling policy is needed to minimise regulatory costs and provide food security.⁷ Housing policy needs to consider impacts on food production and security, alongside directives for growth.

¹ [Proposal A4](#)

² [Fresh-Facts-2024---Online-Version.pdf](#)

³ [Heritage resources: Heritage](#)

⁴ [Auckland ClimateWEB.pdf](#)

⁵ [UNTC](#)

⁶ [Fruit and vegetables drive up annual food prices | Stats NZ](#)

⁷ [The cost of eating healthy: NZ fruit and veg prices are going up way faster than processed food](#)

2.2. Building resilience to weather events

Weather events can cause significant disruptions to fruit and vegetable supply, which impacts food security. HortNZ acknowledges the need for Auckland Council, together with Auckland communities, to address the four R's, Reduction, Resilience, Response, and Recovery, in hazard planning to minimise impacts on communities from weather events. Plan Change 120 has an important role in Auckland's hazard management.

It is important that the policy settings for these hazard and activity categories are based on sound science, robust cost-benefit analysis and clear cause and effect relationships between hazards and impacts.

2.3. Climate change

Growers are already implementing measures to adapt to climate change, including greater exposure to extreme and changing weather patterns. These measures include on-site water storage, Crop Protection Structures (CPSs), improving irrigation efficiency and adapting to greater pressures from pests and disease. For example, Crop Protection Structures protect crops from weather events such as hail, high rainfall and extreme heat, reducing damage to crops and maintaining a more even growing climate.⁸ At the same time, they reduce evapotranspiration, which improves water use efficiency. Furthermore, growers must be able to apply other crop protection controls, where the effects are managed through effective reverse sensitivity provisions.

It is critical that use of these climate change adaptation tools and practices is enabled to ensure horticulture operations to adapt and continue to contribute to the Auckland and national economy.

3. Scope of Plan Change

The NPS-HPL has taken effect since the Auckland Unitary Plan (AUP) became operative, and its provisions should be considered alongside implementation of the NPS-UD.

As well as planning for housing growth, Plan Change 120 characterises and maps risk of flooding, landslides, coastal inundation and coastal erosion. This submission does not examine provisions relating to landslides, as they are of limited relevance to horticulture.

4. Approach to risk management

4.1. Risk management matrix

HortNZ supports the use of a risk management matrix to manage risk based on sensitivity of activity and characteristics of the hazard.

The general approach of categorising risk into very high, medium and low risk appears logical, as is the categorisation of activities into:

⁸ http://www.climatecloud.co.nz/CloudLibrary/2012-33-CC-Impacts-Adaptation_SLMACC-Chapter6.pdf

- Activities sensitive to natural hazards
- Activities potentially sensitive to natural hazards
- Activities less sensitive to natural hazards

The categorisation of risks based on sensitivity ratings above and characteristics of the hazard also seems logical. That is, significant, potentially tolerable and acceptable.

5. Climate change scenarios, local variation and flood modelling

HortNZ notes that the PC120 hazard management framework utilises a risk scenario developed under the National Climate Change Risk Assessment (NCCRA). The scenario chosen is Regional Climate Change Projection (RCP) 8.5, which can be described as a high-risk scenario⁹. NIWA (now Earth Sciences New Zealand) states that RCP 4.5 is a more plausible scenario given international pledges to reduce greenhouse gas emissions.¹⁰ Given that RCP4.5 represents a more plausible scenario, HortNZ considers that applying this scenario would be more appropriate when requiring the community to invest in hazard reduction and resilience.

HortNZ is concerned about the Plan Change's reliance on coarse modelling of floodplains and related flood hazard areas, as displayed on the PC120 Mapviewer and the Geomaps, and the relationship to various resource consent triggers for activities in floodplains. We understand that the information does not represent the best information available to Auckland Council.

Floodplains are defined in the Auckland Unitary Plan (Chapter J) with a note that:

Note: The Council holds publicly available information showing the modelled extent of floodplains affecting specific properties in its GIS viewer for the one per cent annual exceedance probability (AEP) rainfall event (the floodplain maps). The floodplain map is indicative only although Council accepts its accuracy with regard to land shown on the floodplain map as being outside the floodplain. A party may provide the Council with a site specific technical report prepared by a suitably qualified and experienced person to establish the extent, depth and flow characteristics of the floodplain.

....

Council will continually update the floodplain map to reflect the best information available. [emphasis added]

The Resource Management Act 1991 (RMA) requires councils to ensure decisions regarding the identification and management of natural hazards are based on the best available and most accurate information. The ability to provide a site-specific assessment is helpful, but invariably, the display of inaccurate information on the PC120 Mapviewer and the Geomaps loads time/cost and uncertainty onto landowners to continuously prove to multiple parties (e.g. insurers, banks, Council staff) that the modelled data Auckland Council publicly displays is incorrect.

⁹ [Projected regional climate change hazards | Earth Sciences New Zealand | NIWA](#)

¹⁰ *Ibid.*

6. Improving the flood risk model

The Auckland Unitary Plan (AUP) states in the definition of floodplain that Auckland Council will use the best information possible to map floodplains. However, there is a disconnect between property flood risk information submitted as part of the building consent application process and the flood risk model. Additionally, growers have advised us that modelling does not represent flooding modelling by technical experts and accepted as part of their consent application process. HortNZ considers it is unreasonable to require growers to incur costs to provide localised flooding assessments as part of their consent applications given the indicative nature of the floodplain map (see section 5).

HortNZ suggests that Auckland Council develops an automated process where information submitted as part of building consents is provided to the flood hazard modelling team, reviewed and used to improve the model as appropriate. Additionally, that Auckland Council review all localised flood assessments provided to the council as part of consenting processes and update the flood model accordingly.

7. Rule framework

HortNZ is pleased to see the recognition of horticulture under farming activities, and provision for horticulture as a permitted activity in hazard zones. However, HortNZ seeks some amendments to the rule framework to better reflect the intent of the plan. For example, in explicitly providing for Crop Protection Structures and Crop Support Structures as structures ancillary to farming. For example, Crop Support Structures are critical to New Zealand's kiwifruit industry and Auckland kiwifruit orchards. The structures allow kiwifruit to be grown in a canopy which allows more even exposure to light and more favourable harvesting conditions. During floods, water can flow through and underneath these structures, i.e. flood flow is not impeded.

8. An inequitable approach to the use of land and activities outside of existing urbanised areas

Chapter E36 Natural Hazards and Flooding, E36.1 Background, is proposed to be amended through PC120 to state that:

A ~~flexible proportionate~~ risk-based approach has been ~~taken~~ adopted to address the risks associated with natural hazards. A risk ~~management reduction~~ approach applies to land that has been developed for urban use, existing development and infrastructure while a. A risk reduction (including avoidance where appropriate) approach applies to development of greenfield land yet to be urbanised. A risk management approach applies to infrastructure.

The proposed strategy is urban centric. As stated, a risk reduction approach applies to land that has been developed for urban use, and a risk avoidance approach applies to development of land yet to be urbanised.

The background of Chapter E36 Natural Hazards and Flooding provides no statement on the approach to be taken to rural land that is not identified for future urbanisation and in particular the approach taken to risk associated with natural hazards and primary production systems.

There is no section 32 that considers PC120 relative to primary production and whether the provisions of PC120 are effective or efficient in this context.

The inequitable approach to the use of land and activities inside versus outside existing urbanised areas is expressed through E63.3 Policies which uses the hazard (flood, coastal erosion or inundation), the location of the activity (inside vs outside an existing urbanised area), and the sensitivity of the activity to natural hazards to determine the default level of risk, as per Tables E36.3.1B.1 and E36.3.1B.2.

Table E36.3.1B.1 Subdivision, use and development within existing urbanised areas

| | Activities sensitive to natural hazards | Activities potentially sensitive to natural hazards | Activities less sensitive to natural hazards |
|--|--|--|---|
| Very high flood hazard area, high flood hazard area, coastal erosion hazard area 1 and coastal inundation hazard area 1 | Significant | Significant | Acceptable |
| Medium flood hazard area, coastal erosion hazard area 2 and coastal inundation hazard area 2 | Potentially tolerable | Potentially tolerable | Acceptable |
| Low flood hazard, coastal erosion hazard area 3 and coastal inundation hazard area 3 | Potentially tolerable | Potentially tolerable | Acceptable |

Table E36.3.1B.2 Subdivision, use and development outside of existing urbanised areas

| | Activities sensitive to natural hazards | Activities potentially sensitive to natural hazards | Activities less sensitive to natural hazards |
|--|--|--|---|
| Very high flood hazard area, high flood hazard area, coastal erosion hazard area 1 and coastal inundation hazard area 1 | Significant | Significant | Acceptable |
| Medium flood hazard area, coastal erosion hazard area 2 and coastal inundation hazard area 2 | Significant | Significant | Acceptable |

| | | | |
|---|-------------|-------------|------------|
| Low flood hazard, coastal erosion hazard area 3 and coastal inundation hazard area 3 | Significant | Significant | Acceptable |
|---|-------------|-------------|------------|

As a result, the policy of a risk avoidance approach to development of land yet to be urbanised, thereby applies to all rural land, irrespective of whether the future use might be urban or remain rural and support primary production.

The primary difference between Table E36.3.1B.1 and E36.3.1B.2 is that PC120 considers low, medium, high and very high natural hazard risks should have the same weighting for subdivision, use and development outside existing urbanised areas (Table E36.3.1B).

The implication for example is that a new Post-Harvest Facility in a low hazard area in an existing urban has a Potentially Tolerable risk but in a rural area has a Significant risk.

There is no reasonable basis for adopting this approach.

Activities sensitive, potentially sensitive and less sensitive to natural hazards are defined. Those definitions all relate to a) activities where people are regularly present and b) activities which, if damaged, may create a significant public health or pollution issue during and/or after a natural hazard event.

'Rural activities', except those that are listed as 'Activities Potentially Sensitive to Natural Hazards' are identified as 'Activities Less Sensitive to Natural Hazards'. There is no definition in Chapter J of 'Rural activities' so we assume the reference is to Nesting Table J1.3.6. This is as follows:

Table J1.3.6 Rural

| | |
|------------------------------------|------------------------------------|
| <i>Rural commercial services</i> | <i>Animal breeding or boarding</i> |
| <i>Farming</i> | <i>Horticulture</i> |
| | <i>Free-range poultry farming</i> |
| | <i>Poultry hatcheries</i> |
| | <i>Conservation planting</i> |
| <i>Produce sales</i> | |
| <i>Intensive farming</i> | <i>Intensive poultry farming</i> |
| <i>Forestry</i> | |
| <i>Quarries - farm or forestry</i> | |
| <i>Equestrian centres</i> | |

| | |
|--|--|
| <i>Rural industries</i> | |
| <i>On-site primary produce manufacturing</i> | |
| <i>Post-harvest facilities</i> | |

Horticulture itself is defined as an activity:

Horticulture

Production of flowers, fruit, vegetables, and grains.

Includes:

- *greenhouses;*
- *plant nurseries; and*
- *orchards. Excludes:*
- *forestry;*
- *garden centres; and*
- *intensive farming.*

This definition is nested within the Rural nesting table.

We support 'Horticulture' as a 'rural activity', being deemed less sensitive to natural hazards, however PC120 still brings down permitted activity standards, development controls, controls on structures and buildings, controls on the storage of goods and materials, controls on fencing and earth bunds.

The section 32 provides no assessment on the necessity, effectiveness, efficiency or alternatives to this regulatory approach as it relates to primary production.

9. Integral nature of post-harvest facilities to horticulture operations

Post-harvest facilities are used to wash, process, pack and store fresh fruit and vegetables prior to being distributed for sale. Food safety regulations are stringent and require high standards of hygiene for the sale of fresh fruit and vegetables. Supermarkets also have very stringent requirements for freshness, determined by factors such as time between harvesting, chilling and reaching supermarket shelves. Having post-harvest facilities on site allows growers to minimise the time between harvest and processing, which helps growers achieve the food safety and supermarket requirements. It also provides flexibility to the grower who may be supplying to various markets for business reasons and needs to meet multiple packaging requirements across these markets.

Creating onerous consent requirements could impede growers' ability to construct new post-harvest facilities on site or make it very expensive to do so. Having a less onerous regime in medium and low risk zones will still allow risk to be assessed and mitigated, but with more certainty and less cost to growers.

Submission on Plan Change 120

Without limiting the generality of the above, HortNZ seeks the following decisions on Plan Change 120, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|---|
| Overall approach/scope of plan change | | | |
| Approach to Highly Productive Land | Support in part | <p>HortNZ supports the overall intent of Plan Change 120 to concentrate further housing development near existing centres and key transport routes.</p> <p>This approach should go hand in hand with protecting the productive capacity of Auckland's rural and semi-rural areas.</p> <p>HortNZ notes clause NPS-HPL (3.4), which states, <i>Mapping highly productive land, (2) Land that, at the commencement date, is identified for future urban development must not be mapped as highly productive land.</i></p> | Retain plan change, except for amendments sought below. |
| Definitions | | | |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|---|
| New definition: Crop Support Structure | | A definition is needed to provide clarity that structures have a clear permitted pathway. | Insert new definition Means an open structure on which plants are grown. |
| New definition: Sensitive Activity | | | Insert new definition: A sensitive activity means: <ul style="list-style-type: none"> - Dwellings - Education facilities - Marae and papakāinga - Hospitals and aged care facilities. - Public spaces. |
| Activities less sensitive to natural hazards | Support in part | <p>There is no definition of 'rural activities' but there is a nesting Table J1.3.6 Rural. We assume the intent of the proposed reference to rural activities in the proposed definition is to identify that any rural activities listed in Table J1.3.6 Rural are Activities less sensitive to natural hazards.</p> <p>ACPS and CPS ('horticulture') should be clearly identified as a permitted activity in E36 Natural Hazards and Flooding</p> | <p>Amend the definition of activities less sensitive to natural hazards to identify those activities listed in Table J1.3.6 Rural that are activities less sensitive to natural hazards.</p> <p>ACPS and CPS ('horticulture') should be clearly identified as a permitted activity in E36 Natural Hazards and Flooding. This should be made explicit by amending the definition of Horticulture and/or including permitted activity listings in</p> |

| Provision | Support/ oppose | Reason | Decision sought |
|---|-----------------|--|---|
| | | Transport and post-harvest infrastructure needs to be enabled and provided for in plans as there is still | E36 Natural Hazards and Flooding as an activity less sensitive to natural hazards. |
| Activities potentially sensitive to natural hazards | Oppose | Definition including post-harvest facilities is not appropriate, given its classification into 'significant' risk in Table E36.3.1B.2. | Re-define 'post-harvest facilities' to 'Activities less sensitive to natural hazards'. |
| Activities sensitive to natural hazards | Oppose in part | Delete rural dwellings and workers' accommodation from definition and move to 'Activities less sensitive to natural hazards'. | Amend Activities sensitive to natural hazards [A] are activities where people are regularly present and often in a vulnerable state because they sleep there, require medical treatment, or require extra assistance to evacuate. These include: <ul style="list-style-type: none"> • healthcare facilities with overnight accommodation • care centres • hospital • correction facilities • residential dwellings and associated activities (including conversion of one dwelling into two or more dwellings and excluding working from home that do not involve additional people on-site) • marae |

| Provision | Support/ oppose | Reason | Decision sought |
|---|-----------------|---|--|
| | | | <ul style="list-style-type: none"> • visitor accommodation including boarding houses • retirement villages • camping grounds • educational facilities with overnight accommodation • supported residential care |
| E36.Natural Hazards and Flooding | | | |
| Climate Change Scenarios | Oppose | HortNZ opposes use of the RPC 8.5 scenario and seeks the application of RPC 4.5 as representing a more plausible climate change scenario. | Revise hazard modelling based on RPC 4.5 and revise rule framework based on the revised scenario. |
| E36.1 Background | Support | <p>Support the use of a hazard sensitivity and risk category matrix to determine potential consequences of natural hazards. Hazard sensitivity:</p> <ul style="list-style-type: none"> • activities sensitive to natural hazards • activities potentially sensitive to natural hazards • activities less sensitive to natural hazards. | Retain |

| Provision | Support/ oppose | Reason | Decision sought |
|-------------------------|-----------------|--|--|
| E36.2 Objectives | | | |
| E36.2 Objective 3A | Support in part | While it is preferable to reduce risks to existing use and development arising from natural hazards, it is not always possible to do so, without significant cost. These costs may not outweigh the benefits of reducing risk. | Amend: (3A) The risk from natural hazards to people, property, infrastructure and the environment resulting from existing use and development across the region is <u>maintained or reduced</u> over time to a tolerable or acceptable level. |
| E36.2 Objective 3B | Support | Support the need for new subdivision, use and development to avoid significant risk. | Retain |
| E36.2 Objective 3C | Support | Support the avoidance of creating or exacerbating natural hazard risks on other properties | Retain |
| E36.2 Objective 4 | Support | Support allowance for infrastructure where it has a functional need, whilst avoiding creation or creation of risks. | Retain |
| E36.2 Objective 5 | Support in part | Support maintenance and enhancement of flow paths where practicable | Amend Where appropriate, Natural features and buffers are used <u>where practicable and nature-based solutions are used</u> in preference to hard protection structures to manage <u>risk from</u> natural hazards <u>where these nature-based solutions</u> |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|---|
| | | | <u>provide an acceptable level of risk management.</u> |
| E36.2 Objective 8 | Oppose | Hazard modelling will always be uncertain and/or incomplete. Unclear what a precautionary approach means in practice. | Delete objective |
| E36.3 Policies | | | |
| Risk classifications | Support | Support the use of risk classifications 'significant', 'potentially tolerable' and 'acceptable' for subdivision, use and development. | Retain |
| Risk settings and management methodology | Support | The management methodology is supported, in principle. | Retain |
| Table E36.3.1B.2 Subdivision, use and development in flood hazard areas, coastal erosion and coastal inundation areas outside of existing urbanised areas. | Oppose in part | The risk rating for activities 'potentially sensitive' should be 'potentially significant', as it may not be significant for every activity. | Amend Activities potentially sensitive to natural hazards to ' <u>Potentially significant</u> '. |
| Risk assessment requirements | Oppose in part | HortNZ understands the potential effects of climate change are already included in the hazard classification for flood and coastal risk zones. | Amend Consider all of the following, as part of a <u>Where a resource consent is necessary, require proposals to subdivide, use or develop land that is subject to natural</u> |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|--|
| | | Requiring a precautionary approach is highly uncertain and we expect hazard information would inherently be uncertain or incomplete as it is based on modelling. | <u>hazards to prepare a risk assessment of proposals to subdivide, use or develop land that is subject to natural hazards that considers all of the following, taking into account the potential effects of climate change and adopting a precautionary approach where information is uncertain or incomplete:</u> |
| Management of risk for existing use and development (4C) Enable adaptation of existing activities and/or the continued use of existing buildings and infrastructure in natural hazard areas where risk is maintained at, or reduced as far as reasonably practicable to, a tolerable or acceptable level, including by: | Support | Support the use of the terms 'maintained at, or reduced as far as reasonably practicable' | Retain |
| Flooding - general (21) | Support | Support not creating or exacerbating flood risk on other sites through development. | Retain |
| Flooding - general (24) | Support | Support the planting and retention of vegetation cover providing flood risk on other sites is not created or exacerbated. | Retain |

| Provision | Support/ oppose | Reason | Decision sought |
|---|-----------------|---|---|
| Flooding -outside existing urbanised areas | Support | Support the avoidance of subdivision, use and development that gives rise to significant flood risk. | Retain |
| Table E36.4.1A Activity Table Activities on land in coastal hazard areas (A57) Activities where natural hazard risk is significant in accordance with Table E36.3.1B.1 and E36.3.1B.2 in coastal hazard areas | Oppose | Activity status across high, medium and low hazard areas should be differentiated according to the risk status of the hazard area. Consider new Planning Bill and aligning with proposed consent activity statuses (remove non-complying). If we know what effects might be then the activity shouldn't be classified as non-complying. | Amend Very high: discretionary Medium: restricted discretionary Low: permitted |
| Table E36.4.1A Activity Table Activities on land in coastal hazard areas (A58) Activities where natural hazard risk is potentially tolerable in accordance with Table E36.3.1B.1 in coastal hazard areas | Support in part | Activity status across high, medium and low hazard areas should be differentiated according to the risk status of the hazard area. | Amend Very high: restricted discretionary Medium: permitted Low: permitted |
| Table E36.4.1A Activity Table Activities on land in coastal hazard areas (A74) New structures and buildings (excluding dwellings) ancillary to farming activities with a gross floor area of up to 100m2 in coastal hazard areas | Support in part | Support activity status for this activity. Crop Protection Structures and Crop Support Structures are commonly used as part of horticultural activities. Amend to clarify that structures include CPSs and CSSs. | Amend <u>New structures (including crop protection structures and crop support structures) and</u> |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|---|
| | | | buildings (excluding dwellings) ancillary to farming activities with a gross floor area of up to 100m ² in coastal hazard areas. |
| Table E36.4.1A Activity Table Activities on land in flood hazard areas (A78) Activities where natural hazard risk is significant in accordance with Table E36.3.1B.1 and E36.3.1B.2 in flood hazard areas | Oppose in part | Activity status across high, medium and low hazard areas should be differentiated according to the risk status of the hazard area. Non-complying status is proposed to disappear under the new planning bill. | Amend Very high: discretionary Medium: restricted discretionary Low: permitted. |
| Table E36.4.1A Activity Table Activities on land in flood hazard areas (A80) Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 and E36.3.1B.2 in flood hazard areas | Support | Support permitted status where natural hazard risk is acceptable. | Retain |
| Table E36.4.1A Activity Table Activities on land in flood hazard areas (A83) Storage of goods and materials in flood hazard areas | Support | Permitted activity status is appropriate given low level of risk posed by activity. | Retain |
| Table E36.4.1A Activity Table Activities on land in flood hazard areas | Oppose in part | Support RD status in high and medium risk areas, but not in low-risk flood areas | Amend rule status for medium and low risk areas to permitted. |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|---|
| (A84) Storage of hazardous substances in flood hazard areas | | | |
| A86: Re-building of materially damaged or destroyed buildings in flood hazard areas | Oppose in part | Support RD status in high to medium risk areas and controlled status for low-risk areas. | Amend Medium risk to 'Permitted' |
| A99: Flood mitigation works within an overland flow path required to reduce the risk to existing buildings from flooding hazards | Support | | Retain |
| A100: Any buildings or other structures located within an overland flow path with a catchment less than 4,000m ² | Support | Support permitted activity status | Retain |
| Table E36.4.1A Activity Table (A101) Any buildings or other structures located within an overland flow path with a catchment greater than 4,000m ² | Oppose | Unclear why buildings in larger catchments should have stronger consenting requirements. Proportionally, buildings would have less effect on catchment. | Amend All hazard areas: Permitted |
| Flooding - outside existing urbanised areas (30H) | Oppose in part | Support the need to avoid subdivision, use and development where that leads to significant flood hazard, providing Table E36.3.1B.2, Activities 'potentially sensitive' risk is amended to 'Potentially sensitive' | Retain, subject to amendment to Table E36.3.1B.2. |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|---|--|
| Chapter E - Auckland Wide - Subdivision | | | |
| E38.2. Objectives | Oppose in part | <p>We note that infrastructure is to appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.</p> <p>There is also a broad objective to avoid, where possible, and otherwise mitigates, adverse effects associated with subdivision for infrastructure or existing urban land uses;</p> <p>Given the significant intensification proposed by PC120 and the continued promotion of greenfield land through Future Urban Zones on and adjacent to highly provide land, a specific objective is required that sets out the environment outcome for the rural-urban interface as affected by PC120.</p> | <u>Add new objective</u> that sets out the environment outcome for the rural-urban interface. |
| E38.3. Policies | Oppose in part | <u>A new objective should be supported by a new policy</u> that sets out how environment outcomes for the rural- | <u>Add new policy</u> that sets out how environment outcomes for the rural-urban interface will be achieved. |

| Provision | Support/ oppose | Reason | Decision sought |
|--|-----------------|--|---|
| | | urban interface will be achieved as affected by PC120. | |
| E38. Matters of Control and Matters of Discretion | Oppose in part | Matters of Control and Matters of Discretion are required to consider the effects of urban subdivision at the rural-urban interface. | <p>Add Matters of Control and Matters of Discretion are required to consider the effects of urban subdivision at the rural-urban interface.</p> <p>This should include a consideration of how urban subdivision avoids or minimises the opportunity for reverse sensitivity effects from urban activities on agriculture, horticulture, mineral extraction activities, rural industry.</p> |
| E39.6.5.2 Subdivision in the Rural-Countryside Living Zone | Support in part | Mitigations are needed to manage reverse sensitivity effects that can arise where RCLZs are adjacent to Rural Zones | <p>E39.6.5.2 Subdivision in the Rural Countryside Living Zone</p> <p><u>(1)(e) where the site abuts a Rural Zone, a landscaped buffer strip three metres in width and at least two metres in height shall be installed to mitigate potential reverse sensitivity effects.</u></p> <p><u>Any new sensitive activity constructed on a property adjacent to a Rural Zone must be setback 30m from the zone boundary.</u></p> |
| Chapter H Zones - Rural | | | |

| Provision | Support/ oppose | Reason | Decision sought |
|---|--------------------|--|---|
| <p>H19.10 Rural Zone Standards New Standard: Housing development in Rural Countryside Living Zone:</p> <p>H19.10.x Noise insulation</p> | | <p>In terms of reverse sensitivity, the NPS HPL should be considered as a qualifying matter that impacts intensification. Plan Change 120 provides an opportunity to re-consider activity controls to appropriately manage reverse sensitivity effects from development adjacent to Highly Productive Land (3.13(1)(b) NPS-HPL).</p> <p>The objectives and policies of the Rural Zones provide strong direction around protecting soils and rural production activities from adverse effects of subdivision, use and development, including reverse sensitivity. There is an opportunity to amend the rules in the Rural Zone to better reflect the NPS-HPL and the intent of these objectives and policies.</p> | <p>Insert new standard as follows:</p> <p><u>Any new sensitive activity constructed on a property adjacent to a Rural Zone must be setback 30m from the zone boundary.</u></p> <p><u>Any new dwelling constructed on a property adjacent to a Rural Zone must be designed and constructed so that the internal noise level does not exceed 40 dB LAeq(24h) in bedrooms and 45 dB LAeq(24h) in other habitable rooms, with windows closed.</u></p> |