

Submission

PROPOSED PLAN CHANGE 120 (AUCKLAND'S FUTURE HOUSING PLAN)

Submitter: Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA)

Submission type: Support in part (support the direction of PC120, with targeted refinements sought)

Wish to be heard: Yes – the Institute wishes to be heard in support of this submission.

Introduction

This submission is made on behalf of Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA), the professional body representing more than 4,000 architects, graduates, students, and affiliated professionals across Aotearoa.

The Institute supports the intent of PC120: enabling housing capacity where it best leverages public investment in rapid transit (including City Rail Link) while better protecting people and property from flooding and other natural hazards. We welcome the move away from blanket three-storey enablement across almost all residential sites, and we recognise the significance of embedding hazard resilience more robustly in the Unitary Plan.

However, delivery will depend on the next layer of planning and design settings: how buildings, public space, trees, sunlight, privacy, outlook, and neighbourhood coherence are achieved as intensification occurs.

Auckland needs smarter density, not just more density – enabled in the right places, supported by infrastructure, and shaped by good design and master planning.

Executive Summary of Our Position

The NZIA:

- Supports PC120's overall direction to focus growth around centres and rapid transit and to strengthen hazard protections.
- Supports a "build-in first" approach that leverages existing infrastructure and reduces the long-term costs of urban sprawl.
- Seeks refinements so intensification results in coherent, liveable neighbourhoods (not a scattergun pattern of isolated developments), including more explicit master planning expectations at suburb/precinct scale.
- Supports a balanced approach to heritage and special character: protect what is genuinely significant but avoid blanket constraints that block homes in the most appropriate locations.

- Encourages a wider mix of feasible housing typologies (apartments, terraces, duplexes, perimeter blocks, adaptive reuse, and incremental infill) and housing models (co-housing or build-to-rent) aligned to context and amenity outcomes.
- Encourages Auckland Council (and central government partners) to pair zoning with practical delivery tools (design guidance, pattern books, and exemplars) so quality is built in and consenting pathways are clearer and faster for good outcomes.

What We Support in PC120

A more targeted, transit-oriented approach to housing capacity

We support the approach of concentrating new homes around centres and rapid transit. Done well, this supports walkable and connected neighbourhoods, shifts more trips to public transport, reduces emissions, and makes better use of major investment like City Rail Link. We also support the move to deliver significant additional housing capacity through increased height and density around key stations.

Stronger natural hazard provisions

We support stronger provisions to reduce exposure to floods and other natural hazards, including updated mapping, more restrictive consenting in high-risk areas, and ensuring development does not worsen risks for others. Given the experience of the 2023 floods and growing climate risks, the Institute supports a shift towards risk-informed urban growth, provided the system is clear, consistent, and proportionate, and supports best-practice design responses (including nature-based solutions and green infrastructure where appropriate).

Matters Sought

From “broad brush” zoning to fine-grained master planning

PC120 provides a framework for where growth is enabled, but it does not by itself resolve the finer-grained factors that determine liveability, such as connections to surrounding infrastructure, sunlight, outlook, privacy, green space and the relationships between buildings.

The Institute’s view is that Auckland now needs to move beyond zoning as a blunt instrument and commit to structured suburb-by-suburb or precinct-level assessment that tests real built form outcomes and supports coherent neighbourhoods. This is not about adding red tape; it is about avoiding the costly cycle we see when blanket rules land without enough place-based testing: piecemeal development, infrastructure pinch points and amenity loss, followed by community backlash, appeals, redesign, retrofits and further plan changes to fix what could have been resolved upfront. Well-prepared precinct and neighbourhood plans reduce that risk by addressing design, infrastructure and urban form issues early, and by giving both communities and developers confidence and certainty in how intensification will unfold.

Decision sought:

That Auckland Council (and the Independent Hearings Panel) strengthen PC120 implementation settings by:

- requiring or enabling precinct/neighbourhood frameworks in key intensification areas (especially around rapid transit and centres), and
- embedding clear expectations for built form outcomes (light, outlook, privacy, trees/green space, and quality communal open space), to complement zoning capacity.

Smarter density: quality outcomes and a mix of typologies

The Institute strongly supports a mix of housing types, models and scales. Apartments have a clear role near transit hubs and centres, while terraces, duplexes and perimeter blocks can provide medium-density options that integrate into existing suburbs.

We also encourage increased recognition of “lower-disruption” supply: partitioning existing houses, adaptive reuse of underutilised buildings, and well-designed backyard or site infill. These can deliver homes more quickly, with lower embodied carbon and less neighbourhood disruption.

International experience shows that higher-density housing can deliver excellent amenity when the building structure and site layout are carefully managed, such as using mid-rise apartments, perimeter blocks and stepped massing to maintain sunlight, outlook and privacy while achieving significant housing capacity. [Vancouver’s planning framework](#) – often called ‘Vancouverism’ – combines vertical living with adaptive reuse and generous open space. [Carlsberg City in Copenhagen](#) uses a perimeter block housing model with narrow streets and enclosed courtyards that are adjusted to maximise sunlight, airflow and community space. Perimeter block housing has been common in European cities for some time.

These approaches demonstrate that density can be family-friendly, adaptable and compatible with established neighbourhoods, particularly around centres and rapid transit.

Decision sought:

That PC120 (and supporting guidance) more explicitly encourage a diverse typology mix and built form approaches that protect amenity, including mid-rise “family apartment” formats that allow for intergenerational living, co-housing developments, perimeter blocks and courtyard housing, and stepped massing outcomes in appropriate locations.

Heritage and special character: protect what matters, enable where it makes sense

We support heritage protection, but with a balanced lens. Not every pre-1940 villa can or should be preserved untouched; safeguards should focus on what is genuinely significant while still enabling intensification near centres, rapid transit and jobs.

For PC120 to achieve its objectives, enough development capacity must remain feasible in these highly accessible locations. Overly broad or blunt heritage and special character overlays

risk constraining growth where it is most sustainable, pushing development to less connected areas and undermining the intent of the plan.

Decision sought:

That special character and heritage qualifying matters be applied with precision and tested for proportionality, protecting genuine heritage value while ensuring Auckland can accommodate growth in the most infrastructure-efficient locations.

Natural hazards: clarity, proportionality, and design-led resilience

We support stronger hazard controls and updated mapping, including limiting new development in the most vulnerable areas and ensuring development does not worsen risk for others.

At the same time, hazard rules must be practical and clear in application, with consistent risk thresholds and pathways for well-designed mitigation, so the system avoids unnecessary conservatism that can unintentionally reduce housing supply in suitable areas or produce poor built outcomes.

Decision sought:

That hazard provisions and associated guidance:

- provide clear thresholds and evidence expectations for “safe or manageable” risk, and
- encourage mitigation approaches that protect wider catchment outcomes (including floodplains, overland flow paths and green infrastructure) while enabling safe development in appropriate areas.

Capacity distribution and rapid transit planning

We note the Streamlined Planning Process direction includes expectations about testing the appropriate distribution of housing capacity (including greenfield development) and ensuring planned rapid transit stops are identified (including the proposed Northwest busway).

Decision sought:

That Auckland Council’s capacity modelling and mapping transparently demonstrates:

- how capacity is distributed across centres/rapid transit and (where relevant) greenfield areas, and
- how planned rapid transit (including the Northwest busway) is integrated into intensification enablement.

Practical delivery tools (supporting implementation)

Zoning capacity alone will not guarantee good outcomes. The Institute encourages Auckland Council and its partners to invest in tools that make quality easier and faster to deliver, such as:

- pattern books / pre-approved design typologies for terraces and walk-up apartments in appropriate areas,
- clear built form guidance that protects sunlight, outlook, privacy and green space, and



- exemplars that show how intensified living can be spacious, dignified and green.

We also support continued focus on innovation and practical, cost-aware design approaches that improve affordability without sacrificing quality, including incremental intensification models and more adaptable housing formats.

Conclusion

Te Kāhui Whaihanga New Zealand Institute of Architects supports the direction of Proposed Plan Change 120: focusing growth in well-connected locations and strengthening protections from natural hazards.

Auckland's opportunity now is to ensure PC120 leads to well-formed, coherent neighbourhoods, not fragmented, site-by-site outcomes. That will require stronger linkage between zoning and master planning, clear expectations for amenity and built form outcomes, and a balanced approach to heritage and special character.

The Institute is ready to work constructively with Auckland Council, the Independent Hearings Panel, central Government partners, and mana whenua to help translate capacity into liveable, resilient housing and neighbourhoods Aucklanders will be proud of.