

21<sup>st</sup> November 2025

Attn: Sunfield Expert Panel  
c/o Environmental Protection Agency (EPA)

## Sunfield Substantive Application (FTAA-2503-1039) and the Impact of Proposed Plan Change 120

This memorandum responds to the request in Minute 13 for a planning assessment as to the relevance of proposed Plan Change 120 – Housing Intensification and Resilience (**PC120**) notified by Auckland Council on 3 November 2025.

### 1. [Executive Summary](#)

PC120 applies across the Auckland region and seeks to enable housing intensification in existing urban areas and strengthen controls for areas at risk from natural hazards. The Minister's statement of expectation seeks to ensure consideration is given to the appropriate distribution of housing capacity, including enabling greenfield development. In regard to Sunfield and the substantive fast-track application, the following is noted:

- The proposed zoning under PC120 has remained the same as the operative zoning for the Sunfield development site, being Future Urban Zone and Rural – Mixed Rural Zone.
- In regard to the Sunfield proposal, the proposed changes to the provisions relating to natural hazards and flooding (Chapter E36) are most pertinent. The area of the 'flood hazard' has not changed, however, new categories and definitions are introduced and there is a relatively even amount of low, medium, and high hazards. A very high hazard traverses the site from the eastern edge to the north-western portion of the site. The stream and wetland in the south-eastern portion of the site are also classified as very high hazards. The triggers for consent under the PC120 amendments to Chapter E36 are non-complying activities. These rules have immediate legal effect under s86B(3)(f).

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- The application as lodged was for a non-complying activity and under s88A that remains the case.
- The PC120 provisions are relevant to the Panel's assessment under s104(1)(b).
- The Sunfield proposal is considered to meet the proposed objectives of Chapter E36 as amended by PC120 as the subdivision and development will avoid significant flooding risk, with the risk considered to be acceptable. The proposed stormwater management system, using conveyance channels and wetlands, will appropriately manage the risk of the natural hazard.

Overall, proposed PC120 seeks to strengthen the objectives, policies and rules associated with natural hazards and flooding. As outlined within the respective technical reports, the effects associated with flooding can be appropriately mitigated to within acceptable parameters, with the proposed stormwater solutions managing the environmental risk and risk to property and human safety.

## 2. [Background](#)

The Resource Management (Consenting and Other System Changes) Amendment Act 2025 (**the RM Amendment Act**) has introduced a customised process which enabled Auckland Council to withdraw Plan Change 78 - Intensification Planning Instrument (**PC78**) and prepare and notify a new plan change known as the Auckland Housing Planning Instrument (**AHPI**), being PC120.

The AHPI (PC120) allows Auckland Council to withdraw the requirement to implement the Medium Density Residential Standards (**MDRS**). There are certain mandated requirements for PC120, being:

- a) The requirement to provide at least the same housing capacity as provided under PC78 as notified (approximately 2 million dwellings);
- b) Enable at least 15 storeys around Maungawhau (Mt Eden), Kingsland and Morningside rail stations, and at least 10 storeys around Mount Albert and Baldwin Ave rail stations to realise the benefit of the investment into City Rail Link; and
- c) To give effect to the intensification policies of the National Policy Statement on Urban Development (**NPS-UD**).

In accordance with the RM Amendment Act, on 29<sup>th</sup> October 2025 the Minister Responsible for RMA Reform and the Minister of Conservation outlined their expectations in respect of PC120. In regard to these expectations, the following are noted:

- consideration is given to whether Plan Change 120 provisions (including rules and activity status) unduly frustrate development.
- consideration is given to testing the appropriate distribution of housing capacity, including enabling greenfield development.

PC120 was publicly notified on 3<sup>rd</sup> November 2025, with submissions closing on 19<sup>th</sup> December 2025. The outcomes of PC120 seek to:

- a) Change the allocation of residential zoning, and provisions within residential zones to:
  - enable more development within ‘walkable catchments’ of centres and rapid transit stops, through additional building heights and re-zoning.
  - allow additional height outside of the walkable catchments for most of the land zoned Terrace Housing and Apartment Buildings, from five to six storeys.
  - remove special character areas within the walkable catchments of Maungawhau (Mt Eden), Kingsland and Morningside rail stations.
  - have new residential standards, with the MDRS being withdrawn under Plan Change 78.
- b) Identify qualifying matters that restrict and effectively maintain development potential where there is a feature or value that should be protected or avoided.
- c) Have stronger controls and re-zone properties that are at the highest risk from flooding and coastal hazards.

The submission and hearing process will inevitably canvas whether the AHPI can legitimately introduce natural hazard provisions beyond the areas where more development is being enabled.<sup>1</sup> However, for now, the rules have immediate legal effect and the proposed Chapter E36 provisions are relevant to the assessment under s104(1)(b).

### 3. [Legal Context](#)

The Resource Management Act (**RMA**) requires that before a plan change becomes operative, resource consent applications must be considered against the provisions of both the operative plan and any relevant proposed plan change(s).

Under Section 86A and Section 104(1)(b)(vi) of the RMA, consent authorities must have regard to proposed objectives and policies from the time of notification of a plan change. Rules in plan changes have legal effect at different points in time under Section 86B of the RMA. The most common time is when a decision on submissions on the proposed rules is made

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<sup>1</sup> To do so, the provisions must meet at least one of the criteria in subsections 80C(2)(a), (b), (c), (d), (ea) or (f) of the RMA.

and publicly notified, however, exceptions are listed under Section 86B(3) which sets out when rules have immediate legal effect. One such exception is for rules relating to natural hazards.

Unlike its predecessor Plan Change 78, PC120 is not an Intensification Planning Instrument<sup>2</sup> and the operative provisions in Chapter E36 of the Auckland Unitary Plan: Operative in Part (**AUP**) continue to also apply.<sup>3</sup>

In accordance with Minute 13 of the Expert Panel, a weighting assessment has not been undertaken, however, at a high-level, given PC120 has recently been notified, very limited weight can be given to PC120 with the operative provisions of the AUP having significantly more weight.

Section 88A(1A) states that the application continues to be processed, considered, and decided as an application for the type of activity that it was for, or was treated as being for, at the time the application was first lodged. The application was lodged as a non-complying activity, meaning all relevant matters and effects can be considered.

The below sections provide an overview of the provisions that are proposed to be amended or impact the Sunfield development, and which rules have immediate legal effect pursuant to Section 86B(3).

#### 4. [Zoning](#)

The proposed zoning under PC120 remains the same as the operative zoning for the Sunfield development site, with **Figure 1** below illustrating the AUP zoning and **Figure 2** illustrating the PC120 zoning. The site, therefore, is proposed to remain as Rural – Mixed Rural Zone and Future Urban Zone. The zoning of sites adjoining the Sunfield development remains relatively consistent, with the Single House Zone to the south-east of the subject site proposed to be re-zoned to Residential - Mixed Housing Suburban. Whilst not directly adjoining the Sunfield development, a portion of land to the south-west of the Sunfield development is zoned Residential – Mixed Housing Suburban under the AUP and is proposed to be rezoned Residential – Mixed Housing Suburban under PC120.

The areas surrounding both Takanini and Papakura Rail Stations are both considered ‘walkable catchments’ and are proposed to have increased development and intensity.

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<sup>2</sup> See s80DA

<sup>3</sup> S86BA(2) does not apply

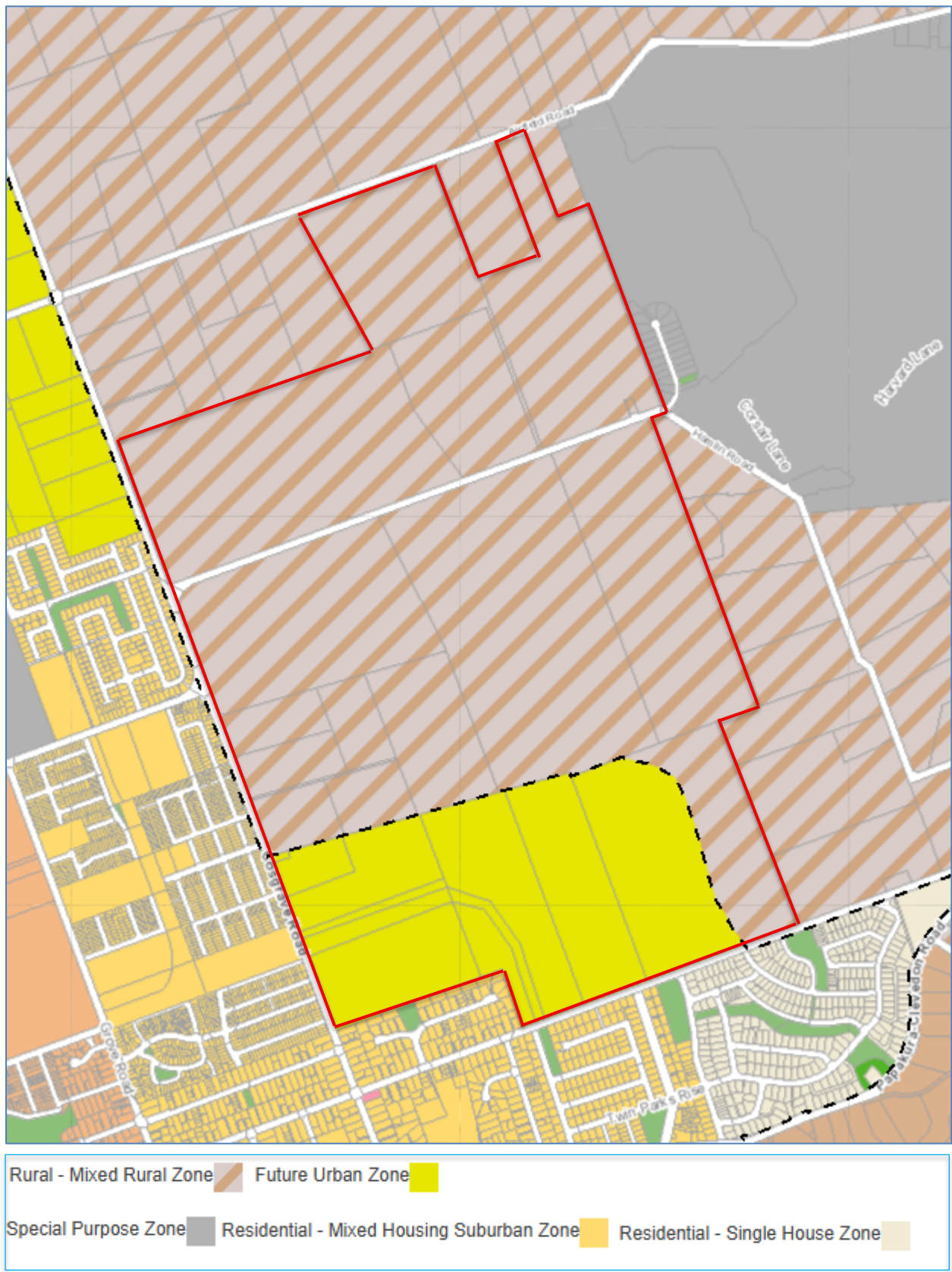


Figure 1: AUP Zoning (Source: Geomaps)

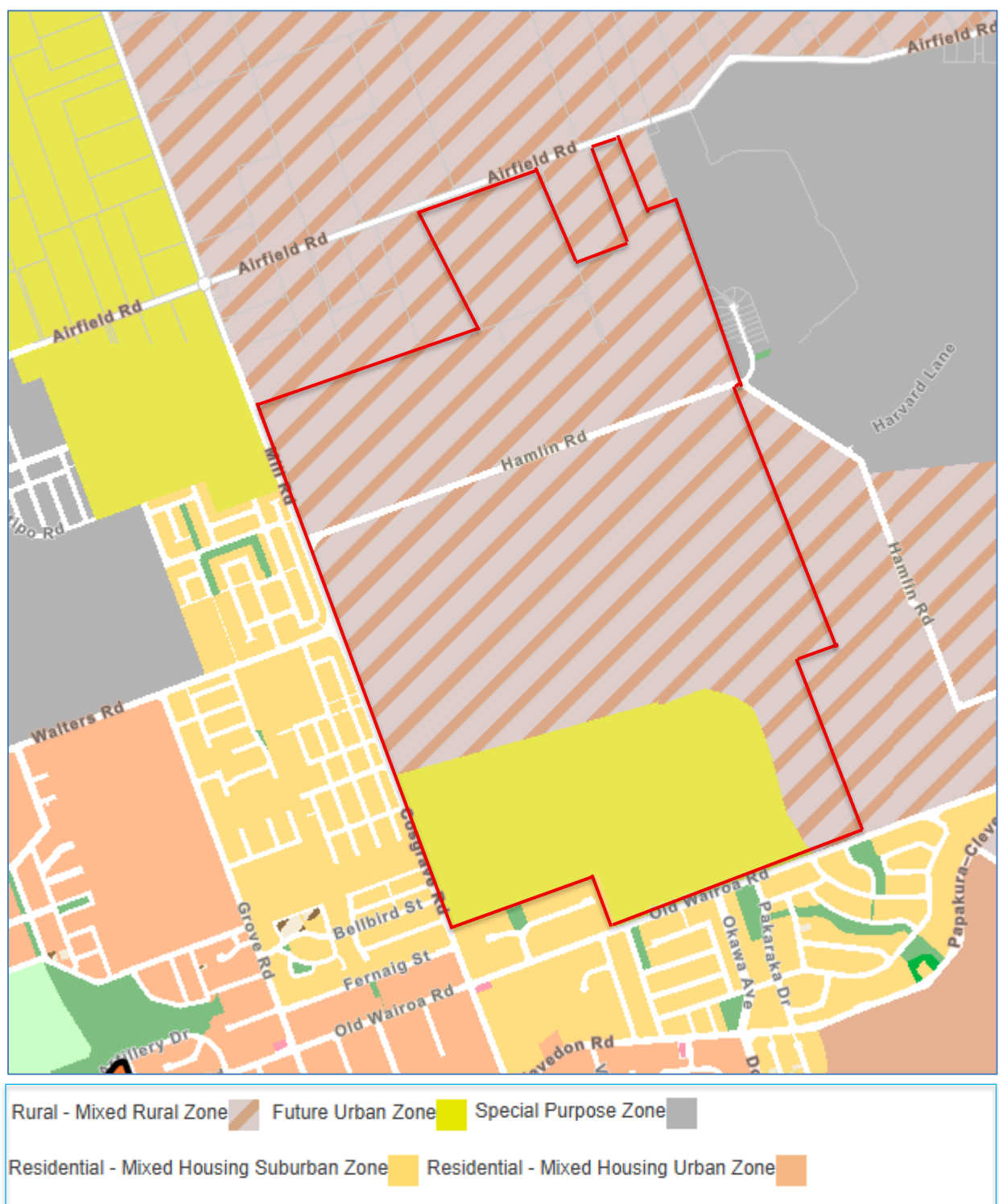


Figure 2: PC120 Zoning (Source: Auckland Council Plan Change 120 Map Viewer)

## 5. [Provisions](#)

This section reviews the relevant chapters of the AUP to determine proposed amendments under PC120 which potentially impact the proposed Sunfield development, and focusses solely on the proposed changes to the AUP provisions.

### 5.1 [Chapter B – Regional Policy Statement](#)

Chapter B contains the Regional Policy Statement, which identifies nine issues of regional significance for resource management in Auckland. These nine issues remain, and the objectives and policies for section B2 - 'Urban growth and form', section B9 - 'Rural environment' and in particular section B10 - 'Environmental risk' have been strengthened regarding the potential impacts of natural hazards and risks. These high-level objectives and policies are re-iterated and aligned to the more detailed provisions of Chapter E36 – Natural Hazards and Flooding, which are addressed in section 5.3 of this memorandum.

Whilst PC120 also addresses intensification and accommodating growth, there are no proposed changes to Chapter B relating to this specific matter.

### 5.2 [Chapter D24 – Aircraft Noise Overlay](#)

The specified noise boundaries surrounding Auckland Airports, including Ardmore Airport, have been identified as qualifying matters in accordance with Schedule 3C Clause 8. There are no proposed changes to the provisions contained within Chapter D24 or the physical extent of the Aircraft Noise Overlay.

### 5.3 [Chapter E36 – Natural Hazards and Flooding](#)

The natural hazards and flooding chapter (E36) of the AUP is proposed to have a range of changes, which aim to strengthen the provisions when developing in areas subject to natural hazards and flooding. With regard to the subject site and proposal, stormwater and flooding matters are deemed to be the relevant natural hazard. For the purpose of this exercise, the rules and standards have been considered first, and then the objectives and policies.

#### 5.3.1 [Activities](#)

The activity table of the AUP is proposed to be deleted and replaced with new activity tables, particularly E36.4.1A for the subject application relating to 'flood hazard areas', '1 per cent AEP floodplain and flood prone areas' and 'overland flow paths'. The proposed activity tables and associated definitions have immediate legal effect.

There are a number of new proposed definitions (as outlined within Chapter J1) relating to these natural hazard characteristics. A 'flood hazard area' contains floodplains, flood prone areas and overland flow paths and are categorised in four classifications based on the depth and velocity of the floodwaters being:

- Very high flood hazard area
- High flood hazard area
- Medium flood hazard area
- Low flood hazard area.

The subset definition of 'floodplain' is proposed to remain as currently worded, and the 'overland flow path' is proposed to be amended with the reference to an upstream catchment exceeding 4,000m<sup>2</sup> being removed and adding '*where surface water will flow during rainfall events*'. The reference to a 4,000m<sup>2</sup> catchment is proposed to be contained within the respective rules under the activity table.

A new definition of a 'flood prone area' is proposed being:

*'An area of land within a topographical depression where water will pond in a 1 per cent AEP rainfall event if soakage is restricted or the primary drainage outlet is blocked.'*

The proposed Activity Table E36.4.1A then outlines the activity status based on the proposed activity and which of the four flood hazard categorisations it falls under (very high, high, medium or low). Whilst most of the proposed activities relate to specific proposals e.g. surface parking (A81), reference is also made to activities and its risk setting to natural hazards in accordance with referenced tables. **Figure 3** below provides an extract from PC120 of proposed Table E36.4.1A.



Activity	Activity status		
	<u>Very high flood hazard areas, high flood hazard areas, coastal erosion hazard area 1 and coastal inundation hazard area 1</u>	<u>Medium flood hazard areas, coastal erosion hazard area 2 and coastal inundation hazard area 2</u>	<u>Low flood hazard areas, coastal erosion hazard area 3 and coastal inundation hazard area 3</u>

Qualifying matter as per Sch 3C, cls 8(1)(a) of the RMA

Activities on land in flood hazard areas				
Use – 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	NC	NC	NC
(A79)	Activities where natural hazard risk is potentially tolerable in accordance with Table E36.3.1B.1 in flood hazard areas	N/A	D	RD
(A80)	Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 and	P	P	P

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#### E36 Natural hazards and flooding

Immediate legal effect under s86B(3)(f) RMA

	<u>E36.3.1B.2 in flood hazard areas</u>			
(A81)	<u>Surface parking and above ground parking areas (including vehicle entry and exit points) in flood hazard areas</u>	D	RD	P

Figure 3: Extract of Proposed Activity Table E36.4.1A from PC120

Table E36.3.1B.2 is applicable for Sunfield as it relates to development outside existing urbanised areas. Proposed Table E36.3.1B.2 is contained within the Policy section of Chapter E36 and is shown in **Figure 4** below.

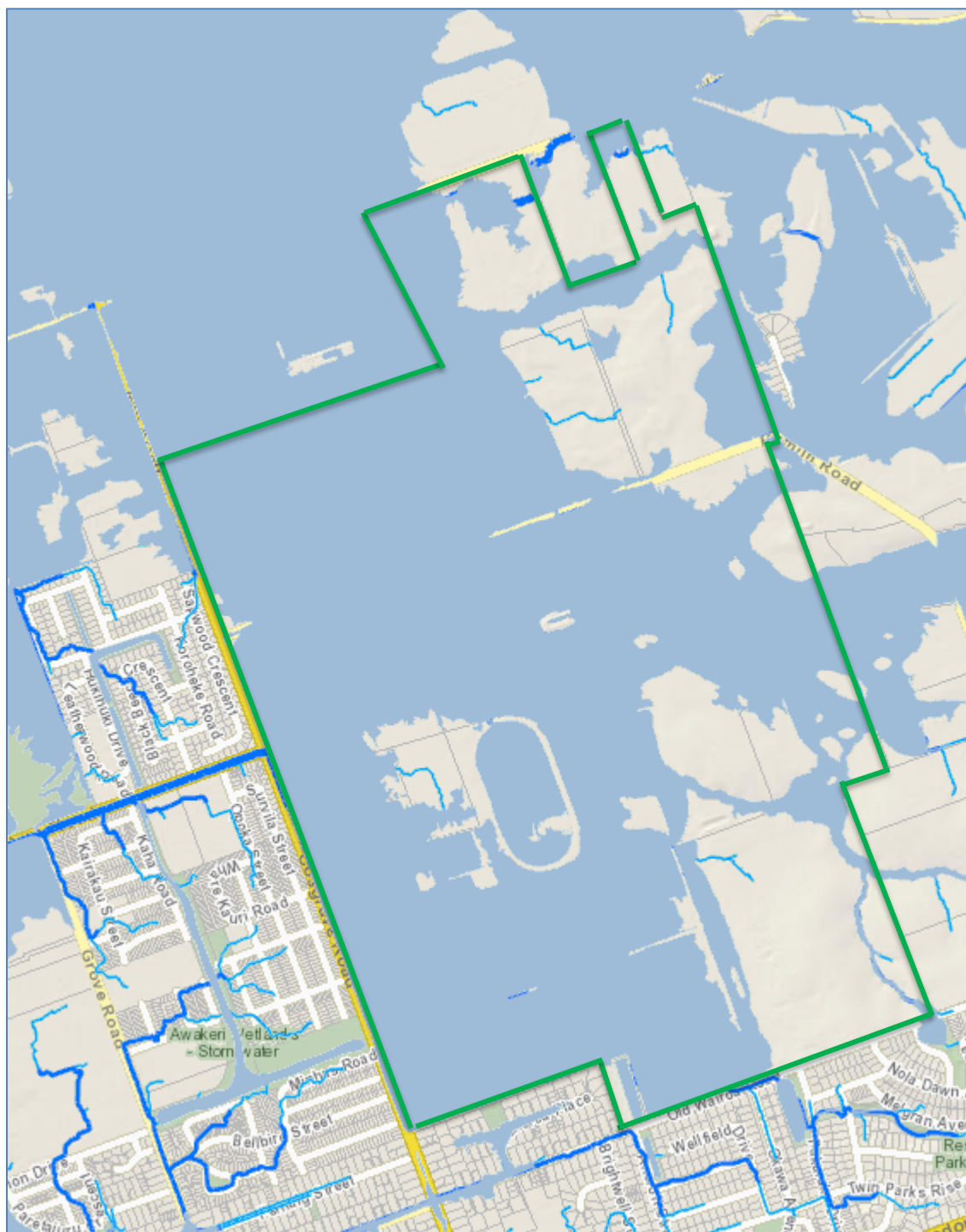
	<u>Activities sensitive to natural hazards</u>	<u>Activities potentially sensitive to natural hazards</u>	<u>Activities less sensitive to natural hazards</u>
<u>Very high flood hazard area, high flood hazard area, coastal erosion hazard area 1 and coastal inundation hazard area 1</u>	<u>Significant</u>	<u>Significant</u>	<u>Acceptable</u>
<u>Medium flood hazard area, coastal erosion hazard area 2 and coastal inundation hazard area 2</u>	<u>Significant</u>	<u>Significant</u>	<u>Acceptable</u>
<u>Low flood hazard, coastal erosion hazard area 3 and coastal inundation hazard area 3</u>	<u>Significant</u>	<u>Significant</u>	<u>Acceptable</u>

Figure 4: Proposed Table E36.3.1B.2 from PC120

A new definition of ‘Activities sensitive to natural hazards’ is proposed under PC120, which is split into two groups – A and B. Group A relates to activities where people are regularly present and often have sleeping arrangements and overnight stays e.g. residential dwellings and hospitals, and Group B which relates to activities which may create health or pollution issues during a natural hazard e.g. industrial laboratory. ‘Activities potentially sensitive to natural hazards’ are defined and are where people are regularly present but would not have an overnight component e.g. offices, retail. Finally, ‘Activities less sensitive to natural hazards’ are also defined and are activities where there is a minimal presence of people e.g. informal recreation and parks.

The Policies of Chapter E36 outline that there are three risk classifications – significant, potentially tolerable and acceptable. Therefore, the consent status is based on the nature of the proposed activity and its sensitivity to natural hazards, and the classification of the flood hazard (very high, high, medium and low). If a resource consent is subsequently required, then a risk assessment is required, as outlined within Policy 3 of Chapter E36, assessing the specific details of the natural hazard and proposal.

In regard to the Sunfield development site and proposal, the flood assessment area remains the same, with **Figure 5** illustrating the 1 per cent AEP floodplain, which the AUP rules are based on, and **Figure 6** illustrating the ‘flood hazard area’ which the PC120 provisions are based on. Figure 6 also illustrates the classification of the flood hazard area.



**Figure 5: 1 per cent AEP Floodplain and Overland Flowpaths** (Source: Auckland Council Geomaps)

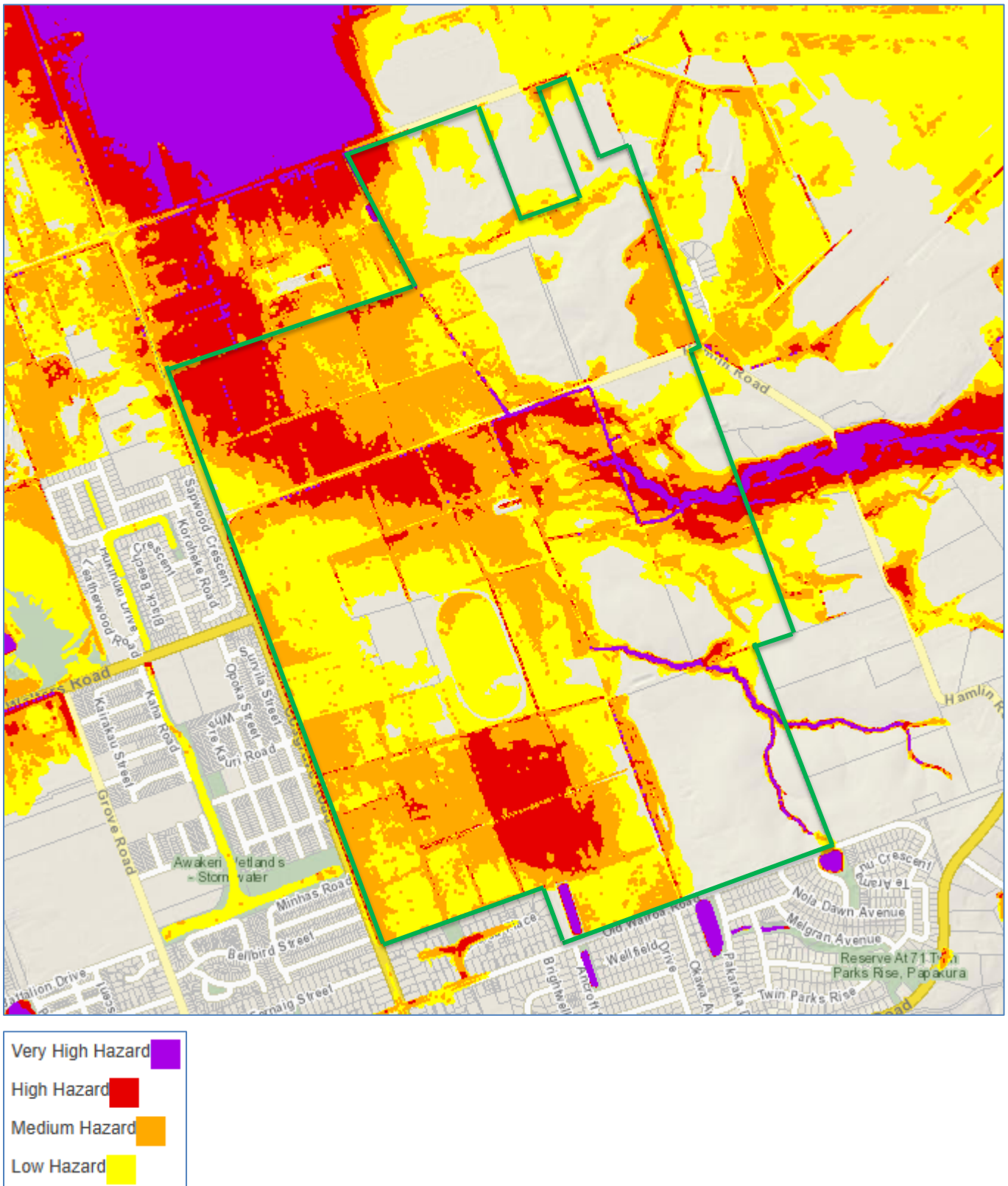


Figure 6: Flood Hazard (Source: Auckland Council Geomaps)

As illustrated by Figure 6, of the flood hazard area which overlays the Sunfield development site, there is a relatively even amount of low, medium, and high hazards. A very high hazard traverses the site from the eastern edge to the north-western

portion of the site, which includes existing farm drains. The stream and wetland in the south-eastern portion of the site are also classified as very high hazard areas.

### 5.3.2 Consent Triggers

Based on the above outline of the natural hazard activity rules, it is considered that the following consent requirements for particular activities as outlined within the risk settings of Table E36.3.1B.2 of PC120 are triggered, as per **Table 1** below.

Activities Sensitive to Natural Hazards	Flood Hazard Area*	Natural Hazard Risk – Table E36.3.1B.2 of PC120	Consent Requirement - Table E36.4.1A of PC120
Residential Dwellings	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Care Centres	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Retirement Village	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Activities Potentially Sensitive to Natural Hazards	Flood Hazard Area*	Natural Hazard Risk	Consent Requirement
Healthcare Facilities (without overnight accommodation)	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Community Facilities	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Entertainment Facilities	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Education Facilities	High	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Rural Industries	Very high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Industrial Activities	Very high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Commercial Services	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Retail	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Rural Commercial Services	Very high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity

Restaurants and Cafes (not specifically listed)	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Storage and Lock up Facilities (on the basis this is located in the 'Industry' nesting table)	Very high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
Offices	Very high/high	Significant	(A78) Activities where natural hazard risk is significant in accordance with E36.3.1B.2 in flood hazard areas – non-complying activity
<b>Activities Less Sensitive to Natural Hazards</b>	<b>Flood Hazard Area*</b>	<b>Natural Hazard Risk</b>	<b>Consent Requirement</b>
Organised Sport and Recreation	High	Acceptable	(A80) Activities where natural hazard risk is acceptable in accordance with E36.3.1B.2 in flood hazard areas – permitted activity

\* Given all flood hazard classifications are identified on the subject site and the proposed activities are in multiple locations, the most restrictive flood hazard area has been identified.

**Table 1**

There are other activity rules under Table E36.4.1A of PC120 that require consideration and assessment, with **Table 2** outlining which rules are infringed.

<b>Activity Table E36.4.1A of PC120</b>	<b>Activity Status</b>
(A81) Surface parking and above ground parking areas (including vehicle entry and exit points) in flood hazard areas	Surface car-parking areas are proposed within very high and high flood hazard areas, which is a discretionary activity.
(A88) Construction of private roads, roads intended to be vested, and accessways in flood hazard areas	Roads are proposed to be constructed in very high and high flood hazard areas, which is a restricted discretionary activity.
(A92) Construction of other land drainage works, stormwater management devices or flood mitigation works in the 1 per cent annual exceedance probability (AEP) floodplain and flood prone areas – <i>Note: If the flood mitigation works or drainage works are to be vested in Council, this is a permitted activity, as per (A91).</i>	It is proposed to vest the flood mitigation and drainage works in Council as a permitted activity, however, Council have indicated that vesting may not be appropriate, hence this restricted activity consent has been listed in the table.
(A98) All other structures and buildings (including retaining walls) in the 1 per cent annual exceedance probability (AEP) floodplain and flood prone areas	Given the buildings are greater than 10m <sup>2</sup> , this restricted discretionary activity consent is required.
(A101) Any buildings or other structures located within an overland flow path with a catchment greater than 4,000m <sup>2</sup>	Consent is required as a restricted discretionary activity.
(A102) Diverting the entry or exit point, piping or reducing the capacity of any part of an overland flow path	Consent is required as a restricted discretionary activity.

**Table 2**

The activities listed within Table E36.4.1A of PC120 have a variety of amended standards and assessment criteria which largely relate to permitted and restricted discretionary activities, noting that the proposal is considered a non-complying activity under PC120, meaning all effects can be considered.

### 5.3.3 Objectives and Policies

New objectives are proposed, with a number proposed to be deleted. Additional objectives (3B) and (3C) are particularly pertinent as they relate to subdivision, use and development, and are outlined below with a respective comment.

*(3B) New subdivision, use and development avoids significant risk and only occurs when the risk from natural hazards to people, property, infrastructure and the environment is assessed as being tolerable or acceptable.*

The proposed subdivision and development will avoid significant flooding risk, with the risk considered to be acceptable. This has been addressed previously under a range of reports and documentation, with the stormwater management system using conveyance channels and wetlands to appropriately managing the risk of the natural hazard.

*(3C) Subdivision, use and development is managed in a way that avoids creating or exacerbating natural hazard risks on other properties, infrastructure and the environment.*

The proposed subdivision and development will ensure that the diversion and storage of stormwater is managed, which avoids exacerbating natural hazards on neighbouring properties. This includes those properties to the north which have limited existing capacity with the Sunfield development reducing post-development flow rates below pre-development levels for the 2-year, 10-year, and 100-year ARI events (24-hour duration).

The policies under Chapter E36 have been heavily amended to reflect the rules under the Activity Tables as outlined above, which specify the risk classifications and the subsequent risk assessment requirements if a resource consent is deemed necessary.

The specific policies relating to flooding have been re-categorised with new sub-headings for 'Flooding – general'; 'Flooding – within existing urbanised areas'; and 'Flooding – outside existing urbanised areas'. The 'Flooding – general' policies have amended the current policies, and of particular note relate to:

- flood risks on other sites not being created or exacerbated (Policies 21, 23 and 24), in line with objective 3C above, which is considered to be the case with the Sunfield proposal; and
- Policy 26 and public roads which are to be vested and parking areas in flood hazard areas to reduce the flood hazard risks to as low as reasonably practicable. As outlined within the various previously submitted reports, the flooding of proposed roads and car-parking areas (and the overall site) will be appropriately managed through the proposed stormwater management system and offered conditions of consent.

The 'Flooding – outside existing urbanised areas' has one new policy (30H), which is outlined below.



*(30H) Avoid new subdivision, use and development outside existing urbanised areas that gives rise to significant flood hazard risk in accordance with Table E36.3.1B.2.*

This is a noteworthy policy, in that Table E36.3.1B.2 is used to determine the activity status of a consent, much like a rule, and provides a risk setting (significant or acceptable) based on an interpretation of a definition and how a proposal fits into such a definition. The policy then sets an extremely high threshold by use of the word ‘avoid’ which applies to proposals that give rise to ‘significant’ flood hazard as per Table E36.3.1B.2 which is the most prevalent risk setting (see Figure 4 above) and includes ‘Activities potentially sensitive to natural hazards’ in ‘low flood hazard areas’. This therefore limits the case-by-case consideration of a site and proposal, which is a key function of the resource consent process and when this policy is ultimately considered.

Based purely on the wording, the proposal is considered to be inconsistent with this individual policy given the relatively crude assessment process which does not factor in any proposed mitigation techniques addressing the effect. However, when looking at the proposal in its entirety and the proposed stormwater management system with the conveyance channels and wetlands to manage diversion and storage, the proposal appropriately manages the risk of the natural hazard in accordance with proposed objectives (3B) and (3C).

#### *5.3.4 Chapter E36 Summary*

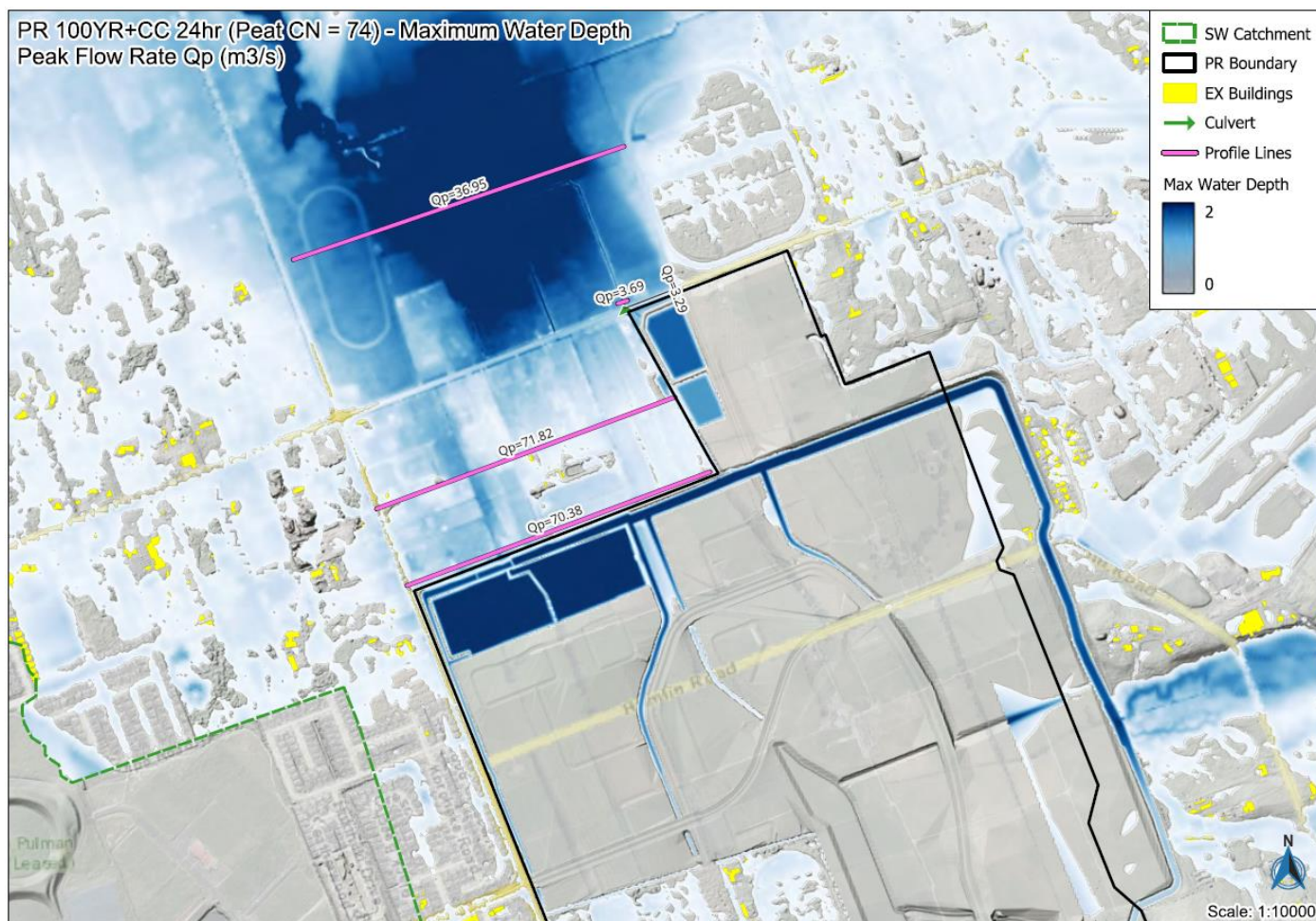
The relevant operative rules and provisions of Chapter E36 were considered and assessed under the lodged substantive application, recognising that these consent triggers are restricted discretionary activities, and the matters of discretion are restricted to the effects of and from flooding and stormwater flows. PC120 proposes to strengthen these provisions, with these rules proposed to become non-complying activities. The consent as originally lodged was overall deemed a non-complying activity, meaning all relevant matters could, and were, taken into account and considered. Therefore, the current assessment is still relevant and deemed to be appropriate as it factors in all pertinent matters.

PC120 does not propose prohibited activities (which can still be considered under the Fast-track Approvals Act), meaning a consenting path is still envisaged in the right circumstances with an appropriate proposal and acceptable mitigation. As outlined under section 5.2.3 of the Section 55 Planning Response Report regarding the section 85(3) assessment for flooding and stormwater:

*‘There are potential adverse effects arising from stormwater and flooding on the proposed development. However, in recognition of the proposed stormwater management solutions including the stormwater channels and basins outlined within the original application and within the additional information provided as part of the s55 response documentation, including proposed conditions, it is considered that these effects can be appropriately mitigated. The proposed stormwater solutions are considered to appropriately manage environmental risk and the risk to property and human safety. Accordingly, this is not deemed to be an adverse impact in the context of the FTAA.’*



PC120 does not alter the ability to mitigate these effects from a stormwater and flooding perspective, with **Attachment A** illustrating the 100-year event (including climate change) post development, which is taken from the Stormwater Modelling Report. **Figure 7** below illustrates the 100-year event (including climate change) post development for the northern portion of the Sunfield.



**Figure 7: The 100-year event (including climate change) post development for the northern portion of the Sunfield (Source: Stormwater Modelling Report - Maven)**

#### 5.4 Chapter E39 – Subdivision - Rural

The objectives and policies of Chapter E39 – Subdivision – Rural are proposed to be amended under PC120 regarding natural hazards and flooding, with Chapter E36 – Natural Hazards and Flooding cross referenced in the proposed policies. The Activity Table (E39.4.2) for Rural Subdivision has minor amendments to reflect the new terminology and definitions of PC120, although an amended standard (E39.6.4.2) is proposed for subdivision activities which are a restricted discretionary activity to ensure buildings, access and infrastructure can be located away from high-risk natural hazards. These changes therefore do not affect the assessment or consent triggers, recognising the originally lodged consent was overall deemed a non-complying activity, meaning all relevant matters could, and were, taken into account and considered.

## 5.5 Chapter K – Designations

The notified version of PC120 outlines that *‘Some designations are a qualifying matter in accordance with Schedule 3C cls.8(1)(a) of the RMA’* within Chapter K, however, the schedule of designations is not provided in the notified version on the Council website. The PC120 GIS Map Viewer, however, identifies the relevant designations as qualifying matters which have been addressed within the originally submitted application:

- Designation 1102 – Auckland Airport – Obstacle Limitation, Runway Protection and Ground Light Restriction.
- Designation 200 – Ardmore Airport Limited - Airport purposes.
- Designation 623 – Auckland Council – Takanini Stormwater Conveyance Corridor (Awakeri Wetlands).
- Designation 9104 – First Gas Limited – Gas transmission pipeline.

## 6. [Summary and Conclusion](#)

Overall, proposed PC120 seeks to strengthen the objectives, policies and rules associated with natural hazards and flooding. As outlined within the respective technical reports as part of the lodged substantive fast-track application and Section 55 Response, the effects associated with flooding can be appropriately mitigated to within acceptable parameters, with the proposed stormwater solutions managing the environmental risk and risk to property and human safety.

Yours faithfully



Ian Smallburn – **Planning Consultant, Tattico Limited**