

Additional submission on Plan Change 120

Housing intensification and resilience

The Cabbage Tree Swamp 2025 Inc

To Auckland Council | 24 September 2026

1 Purpose and position

The Cabbage Tree Swamp 2025 Inc (the Society) seeks lower residential development intensity in the Cabbage Tree Swamp area, protection of land needed for flood management, and coordinated stormwater and wastewater planning across the Waitītiko/Meola catchment. This additional submission supplements, and does not replace, the Society's earlier PC120 submission.

The Society supports PC120's stronger natural-hazard provisions and the recognition of infrastructure constraints. It opposes additional residential intensification in Cabbage Tree Swamp where the cumulative flood risk and servicing effects have not been adequately assessed and addressed. Its preferred zoning outcome is Residential – Single House Zone for residential land within the local submission area, to the extent that this is within PC120's scope, lawful and supported by the evidence.

The Society acknowledges the revised PC120 proposals and partial withdrawal of some proposed changes. Existing submissions continue to stand unless withdrawn. The relief below distinguishes between zoning changes that remain before the hearings process and matters requiring separate Council action. [1, 2]

2 Geographic scope

The local focus is the low-lying Cabbage Tree Swamp area around Gribblehirst Park and adjoining streets, principally east of Sandringham Road and extending toward Dominion Road, including Parrish Road, Gribblehirst Road, Cambourne Road and St Albans Avenue. Map 1 shows the Society's approximate area of submission, Council's supplied flood-hazard layers and the surrounding street and parcel pattern. The red outline is indicative only; it is not an official flood, catchment, zoning or cadastral boundary.

The local submission area is distinct from the wider Waitītiko/Meola catchment. The Society's request for catchment assessment extends upstream and downstream beyond Map 1 because development and infrastructure elsewhere can affect flooding within Cabbage Tree Swamp.

Map 1 does not depict current PC120 zoning, withdrawal status, qualifying matters or land ownership. Those matters are governed by the Council's notified and proposed planning maps and the relevant property information. Withdrawal of a proposed zoning change should not be treated as removing any Auckland-wide natural-hazard or other provisions that continue to apply. [1]

3 Flooding and cumulative development effects

Cabbage Tree Swamp contains interconnected low-lying land, mapped floodplains, flood prone areas and overland flow paths. Residents' experience of the January 2023 floods, together with the historical Meola modelling and Council mapping, demonstrates the need to consider the drainage system across property boundaries. Historical modelling is relevant background, but current decisions should use updated information and be checked against the observed 2023 flooding. [6, 7]

The Society is concerned that redevelopment across the contributing catchment can increase runoff, alter surface-flow routes, reduce available flood storage and expose more people to flooding. The outcome depends on the development footprint, imperviousness, ground conditions and effectiveness of mitigation. Building height alone is not a measure of stormwater effects; the location and form of development, occupancy and safe access also matter.

Site-specific controls remain necessary, but they should sit within an assessment of cumulative catchment effects. That assessment should address changes in runoff volume and timing, local and downstream capacity, floodwater displacement, blockage and exceedance conditions, and the performance of mitigation during prolonged or intense rainfall.

The Society asks that Council investigate apparent gaps in road drainage, including the approximately 300-metre lengths of Parrish Road and Gribblehirst Road from their Sandringham Road ends previously identified by residents. This is an observation requiring verification against asset records and site inspection, not a confirmed inventory of missing catchpits.

4 Natural hazards and residential zoning

The Society supports PC120's stronger E36 controls applying to flood hazard areas, including floodplains, flood prone areas and overland flow paths. Development should preserve necessary flood storage and conveyance, avoid unacceptable risk to occupants, provide appropriate access and emergency arrangements, and avoid increasing flood risk on other properties. [9]

The Society seeks Residential – Single House Zone as its primary relief for residential land within the local submission area where a zoning amendment remains within PC120's scope. It considers that a coherent reduction in intensity should be assessed against the interconnected flooding and infrastructure constraints, rather than relying only on the deepest mapped flooding on individual sites.

The Society recognises statutory intensification requirements and the need for evidence to justify qualifying matters. Where the full Single House outcome cannot lawfully be applied or is not supported for particular land, it seeks the greatest reduction in height, density and development intensity justified by the applicable constraints. The zoning request is accompanied by the hazard and servicing controls below; zoning alone does not eliminate flood risk.

Where the relevant zoning changes have been withdrawn from PC120, the Society supports retention of the operative zoning without an additional zoning uplift through this plan change. If further downzoning or land protection is required outside PC120's remaining scope, the Society asks Council to pursue the appropriate separate planning process.

5 Combined wastewater servicing and Central Interceptor

The Society supports retention of the Combined Wastewater Servicing Constraint qualifying matter and the associated Infrastructure - Combined Wastewater Network Control wherever the mapped servicing constraint remains. The notified section 32 evaluation identifies the control as a means of requiring additional assessment where development is served by the combined network and local servicing constraints remain. Additional development should be supported by demonstrated wastewater capacity and an appropriate stormwater servicing solution. [10]

Flooding and combined-network performance need coordinated assessment. Surface-water inflows, network surcharge and overflow arrangements can interact during wet weather, while development can increase wastewater demand. The assessment should identify the local constraints and the capacity available under the relevant development and rainfall scenarios.

The Society acknowledges Watercare's July 2026 announcement that the Central Interceptor is fully operational. It receives flows from the combined wastewater network and substantially reduces wet-weather wastewater and stormwater overflows, while providing the backbone for further network improvements. [3]

Those benefits do not, by themselves, demonstrate that additional development in Cabbage Tree Swamp can be accommodated safely. The Society seeks evidence of the actual benefit to local flood behaviour, together with assessment of the remaining surface drainage, overland-flow, storage and local-network requirements. It does not assume that the Central Interceptor has no stormwater function, or that its operation resolves every local constraint.

6 Vacant land and opportunities for mitigation

Council-owned vacant and flood-acquired land should be assessed for flood storage, surface-water conveyance, stormwater management, ecological restoration and compatible public recreation. Strategically useful sites should be retained and protected before disposal or redevelopment removes those opportunities.

Where a site's intended function supports it, the Society seeks Open Space – Informal Recreation Zone. That zone provides for informal recreation and generally limited buildings and structures. Other sites may require a different open-space zone, hazard protection or an infrastructure mechanism suited to their function. A designation, acquisition or reserve decision may require its own statutory process. [4]

Vacancy or flood-buyout status alone does not establish suitability for a detention basin or public park. Suitability should consider topography, hydraulic connectivity, contamination, public safety, access, maintenance and the effect on other properties. Privately owned land requires separate consideration of ownership and any justified acquisition; an open-space zoning request does not itself create public ownership or access.

Elizabeth Walker's notes of the September 2026 Watea Reserve discussion record preliminary testing of a bund and constraints associated with road levels, existing storage and combined sewers. The Society supports further investigation, including local rainfall and saturated-ground scenarios, but does not rely on the preliminary results as an approved design, a committed project or proof that intensification is safe. [5]

Watea Reserve, Taumata Reserve, Gribblehirst Park, existing school detention facilities and suitable vacant sites should be considered within a coordinated programme. Options may include detention, improved drainage and surface conveyance, creek restoration or daylighting, and distributed retention. Infiltration measures should be assessed against local geology, groundwater and site testing rather than assumed to work uniformly across the catchment.

The 2018 Waititiko - Meola Creek Enhancement Plan, prepared by AECOM for Watercare's Central Interceptor project, provides useful context for this broader approach. It identified ecological and riparian enhancement works at Roy Clements Treeway, Norwood Reserve, the Mt Albert Grammar School farm and Te Kura Kaupapa Maori O Nga Maungarongo, and was developed with community and other stakeholders. The Society does not rely on that plan as a flood-management or hydraulic-capacity assessment; rather, it demonstrates an established history of coordinated creek enhancement and community involvement in the Waititiko/Meola system. [8]

7 Catchment assessment and delivery

The Society asks Council and Watercare to prepare an updated, funded Waititiko/Meola catchment stormwater and flood-management programme before relying on additional development capacity in Cabbage Tree Swamp. It should build on existing studies and infrastructure, identify remaining gaps and involve affected communities and mana whenua.

The assessment should:

- Use current terrain, rainfall and climate-change information, assess the 2023 flood observations, and explain model limitations and uncertainty.
- Compare existing conditions with realistic future development scenarios, including changes in effective imperviousness, occupied floor area and the number of people exposed to flooding.
- Assess the interaction of stormwater, combined wastewater, groundwater and surface flooding, including blocked or surcharged systems and events exceeding design capacity.
- Verify road drainage, catchpits, culverts and other outlets, and identify the flood storage and flow routes that must be maintained.
- Assess mitigation options together, including existing detention assets, reserve storage, strategically important vacant land, daylighting and distributed measures.
- Set out costs, funding, responsibilities, land requirements, timing and maintenance, and show when necessary infrastructure will be available to serve development.

The request for funding, land retention and infrastructure delivery is addressed to Council and Watercare through their relevant programmes. Within PC120, the Society seeks zoning, policies and controls that respond to the identified risks and align development with demonstrated servicing capacity and enforceable delivery of necessary mitigation.

8 Decisions sought through PC120

Subject to the remaining scope of PC120 and the evidence for the affected land, the Society seeks the following decisions:

- a Residential zoning.** Apply Residential – Single House Zone to residential land within the Cabbage Tree Swamp submission area. Where that outcome is not lawful or justified for particular land, reduce the enabled height, density and intensity to the extent supported by the relevant natural-hazard and infrastructure qualifying matters.
- b Zoning changes withdrawn from PC120.** Retain the operative zoning where the proposed zoning uplift has been withdrawn, without introducing additional intensification through the withdrawn component. Continue to apply any relevant Auckland-wide provisions that remain within PC120.
- c Flood hazard provisions.** Retain and, where the evidence supports it, strengthen the natural-hazard objectives, policies, rules and mapping. Protect flood-storage and conveyance functions, address cumulative effects and residual risk, and prevent development from increasing flood risk to other properties.
- d Combined wastewater servicing.** Retain the Combined Wastewater Servicing Constraint qualifying matter and Infrastructure – Combined Wastewater Network Control where the constraint remains. Any relaxation should follow evidence that the relevant servicing constraint has been resolved, using the applicable planning process.
- e Strategic land protection.** Protect identified vacant or flood-acquired land needed for flood management or a connected blue-green network. Apply Open Space – Informal Recreation Zone where appropriate, or another suitable planning mechanism. Seek a site-specific outcome based on the intended function and evidence, with private ownership addressed separately.
- f Infrastructure and development.** Amend relevant policies and controls so that additional development is assessed against cumulative catchment effects and demonstrated stormwater and wastewater capacity, including the delivery and maintenance of mitigation on which it relies.

g Alternative and consequential relief. Make consequential amendments to the relevant maps, zones, overlays, controls, objectives, policies and rules. If the primary zoning request is not accepted, adopt alternative provisions that achieve substantially the same protection of people, flood-management functions and infrastructure capacity.

9 Related requests to Council and Watercare

In addition to the PC120 decisions above, the Society requests an updated and funded catchment programme as described in section 7; retention of strategically useful public land pending that assessment; investigation of justified acquisition and permanent protection; and appropriate separate planning action where necessary measures fall outside PC120's remaining scope.

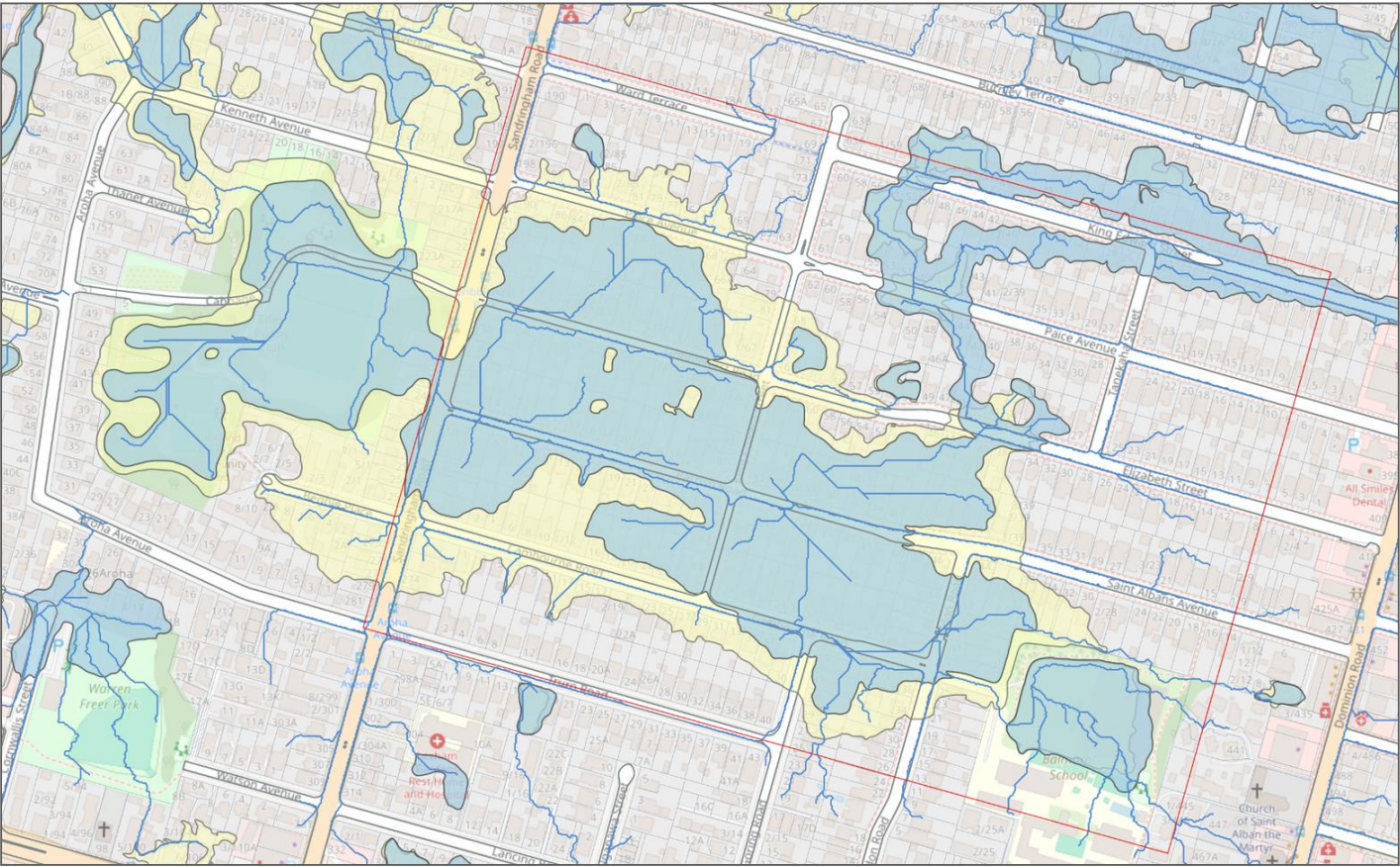
These requests recognise that plan provisions, infrastructure investment and land-management decisions need to work together. Future development decisions should be supported by evidence of acceptable flood risk and adequate servicing, with necessary works delivered at the appropriate time.

10 Supporting material

The following material supports the matters discussed above. Historical modelling and the supplied GIS exports provide context and should be considered alongside current Council mapping, the notified PC120 provisions and subsequent technical evidence.

- 1 Auckland Council, Auckland's Future Housing Plan – Plan Change 120, September 2026 submission information and explanation of the revised proposals. [Source](#)
- 2 Auckland Council, Aucklanders to have their say on proposed changes to Plan Change 120, 22 July 2026. [Source](#)
- 3 Watercare, Central Interceptor fully live, delivering a cleaner future for Auckland, 20 July 2026. [Source](#)
- 4 Auckland Unitary Plan, H7 Open Space zones, particularly H7.5 Open Space – Informal Recreation Zone. [Source](#)
- 5 Liz Walker, Watea Bund Meeting 2026, community meeting notes supplied in September 2026. Preliminary discussion, not a final engineering design or Council commitment.
- 6 Auckland Council GIS exports supplied in August 2026: parcels, floodplains, flood prone areas, overland flow paths, kerblines and stormwater catchments. Map 1 reproduces the selected layers in NZTM2000.
- 7 URS, Meola Catchment Modelling System Performance Assessment, prepared for Auckland Council, 11 December 2014, including the floodplain maps and modelled performance assessment.
- 8 AECOM New Zealand Limited, Waititiko - Meola Creek Enhancement Plan, Revision D, 10 December 2018, prepared for Watercare Services Limited's Central Interceptor project.
- 9 Auckland Council, Plan Change 120, Chapter E36 Natural hazards and flooding (notified provisions). [Source](#)
- 10 Auckland Council, Plan Change 120 section 32 evaluation: Combined Wastewater Servicing Constraint. [Source](#)

Map 1 Cabbage Tree Swamp locality and mapped flood hazards



Legend

- Approximate area of submission
- Council floodplain layer
- Council flood prone area layer
- Council overland flow paths
- Parcel boundaries
- Kerblines / road edges

Note

The red outline shows the Society's approximate area of submission and is indicative only. It is not an official flood, catchment, zoning or property boundary.

Map coverage

This map identifies the Society's local area of submission. The requested Waititiko/Meola catchment assessment extends beyond the area shown.

Source: Auckland Council / LINZ layers exported from QGIS. Hazard mapping is reproduced as supplied. The red outline is approximate and is included only to identify the local focus of this submission.