

Submission on notified proposal - Auckland Council Plan Change 120

To: Auckland Council

Name of submitter: St. Lukes Environmental Protection Society Incorporated (STEPS)

This is a submission to Auckland Council on proposed Plan Change 120 to the Auckland Unitary Plan.

We could not gain an advantage in trade competition through this submission.

Introduction to St. Lukes Environmental Protection Society (STEPS)

- STEPS was formed in 2005 to enhance and protect ecological values in the Waitītiko-Meola Creek catchment. The focus of STEPS' work is the health of the community and the environment of Waitītiko-Meola Creek in Auckland.
- STEPS has established a spring-fed wetland; we maintain several lava forest sites, and perform regular water quality monitoring. Four main restoration sites are: MOTAT lava rock forest, and riparian zone opposite Kanuka St and Premier Ave, Point Chevalier; Chamberlain Park rock forest opposite Norgrove Reserve; Roy Clements Treeway including wetland and lava forest behind Mount Albert Grammar School (MAGS); and Watea Stormwater reserve in Sandringham.
- We restore and advocate for, rare and high-value Auckland ecosystems such as lava rock forest and wetlands. We aim to work with Auckland Council (AC), to connect Meola Creek from “mountain to sea,” for the benefit of birds, humans, and the creek's ecosystems. The Auckland Unitary Plan (AUP) recognises both Outstanding Natural Features, and Significant Ecological areas along this creek. Around 80% of Waitītiko-Meola Creek lies within Albert Eden Local Board (LB), and 20% in Waitematā LB.
- STEPS advocates for fresh water policy and standards, and has submitted on fresh water for 20 years. Sadly, spring-fed Meola Creek has become one of NZ's most polluted urban streams, transporting over 1 million cubic meters of stormwater-driven sewage overflows flowing into Waitemata Harbour each year.
- We monitor progress on the Western Isthmus Water Quality Project, and Water Quality across Auckland. We support “renewals” by both Watercare and AC Healthy Waters (ACHW) as having high priority, and are keen to see optimal investment in water quality and flood protection and resilience.
- In following the progress of “Super-tunnel” since 2005, to the near completion of the Central Interceptor, STEPS has experienced the decades of lead time involved in planning and designing \$1 billion water networks, with the benefits to Meola catchment residents yet to be realised.

Specific Provisions

The specific provisions of the proposed plan change that our submission relates to, are all the provisions relating to the zoning of all the properties which are in the:

- ❖ Meola stormwater catchment: the area bounded by Point Chevalier Rd; Carrington Rd; Mt Albert Rd; Mt Eden Road, Western Springs Rd; through reserves to the northern tip of Te Tokaroa Meola Reef. [See map and description in Appendix.]

- ❖ We **oppose** the zoning of all residential properties in the catchment which are zoned other than Residential-Single House Zone, and ask that all properties throughout residential areas in Meola catchment be zoned Residential- Single House zone for now (with no expansion of business / mixed use zones) until adequate stormwater infrastructure is in place throughout Meola catchment.

Our reasons are:

While we support Combined Wastewater Servicing Constraint as a Qualifying Matter, we do not think that assessing one development at a time is sufficient to protect people and property in Meola Catchment.

Plan Change 120 is said by Council to:

- better protect people and property from floods and other natural hazards
- and focus more new homes in safer, well-connected areas close to jobs, shops, services, and fast, frequent public transport.

One aim is to make better use of existing infrastructure. Another aim is to make it harder to get permission to build where there is more than a low-level risk from flooding or other natural hazards.

We do not oppose the concept of intensifying around CRL stations. Intuitively it seems obvious by looking at a road and rail map.

Yet Council proposes to allow for building heights of at least 10 or 15 storeys in walkable catchments around five Western Line train stations:

Mangawhau (Mt Eden) Train Station – 15 storeys (50m)

Kingsland Train Station – 15 storeys (50m)

Morningside Train Station – 15 storeys (50m)

Baldwin Train Station – 10 storeys (34.5m)

Mt Albert Train Station – 10 storeys (34.5m)

All these five stations are situated in Meola catchment, which means that the bulk of rail-centred intensification, risks imposing many times the existing load on to combined sewer overflows, without a stormwater infrastructure throughout Meola catchment.

- The geology of the substrata underlying these rail stations needs confirmation. All five railway stations are on or near the Meola-Western Springs basalt lava flows which are of very low permeability, meaning they are potentially flood-prone. Large parts of the walkable catchments from the five CRL train stations are in areas which routinely flood, and/or are serviced by combined stormwater and wastewater overflows.
- Meola creek delivers half the human waste reaching Waitemata Harbour and its beaches.
- Ngā Ana Wai (watery caves), became “Cabbage Tree Swamp,” an area of wetlands and lava forests before 1930. Development over the past century, has proceeded with either minimal or no provision, for separating stormwater flows from wastewater pipes. Wetlands were “drained” and reduced to Gribblehirst Park and Eden Park. Restoration of wetlands, and more active management of fresh water are much needed as groundwater levels are varying over time.
- The statement that Plan change 120 will provide stronger protections from floods and other hazards, cannot be reconciled with the daily realities of Meola creek overflows. In our neighbourhood, following

medium rainstorms, many manholes release wastewater, personal care products, contraceptives, and human waste on to our parks, and toilet paper hangs on the trees lining Meola creek.

- Our climate is changing. There is no funding, nor a plan to separate stormwater, or deal with expected more frequent occurrences of large floods overflowing into Waitemata Harbour in combination with human waste. PC120 does not show ability to enact the sponge city concepts required for a future focussed liveable city.
- ACHW and Watercare have indicated that the cost of building stormwater infrastructure on or under hard basalt lava in Meola catchment will be around \$1.2 billion. They have inferred that low cost-benefit means the infrastructure will not be built for many decades, because of potential low benefits likely to be achieved for the cost involved. “The aquifer is the [stormwater] pipe” they say.
- Despite Council's good intentions, we envisage that pollution of harbourside beaches will continue to worsen if PC 120 as now drafted is implemented in Meola catchment.
- We also ask that the current map of Watercare capacity in Auckland, should show the 20,000+ properties served by combined sewer network as being distinct from “area with capacity”. Watercare advise they have always treated combined sewer areas differently, and we are concerned that developers should be made aware of their differences and limitations.

Central Interceptor (CI)

- The **CI has been built by Watercare to transport wastewater (sewage)**. Its primary role as wastewater infrastructure will (together with other future interceptors) ultimately enable Watercare to process more waste at Rosedale and less at Māngere Wastewater Treatment Plant (MWTP).
- Haverstock Rd, and Lyon Ave on Meola Creek are the largest combined sewer overflows in Auckland, and in NZ. While **CI is not designed for stormwater removal** as such, after 2028, the CI will provide storage during smaller storms to allow the combined wastewater and stormwater to be processed at MWTP.
- As the population increases, the proportion of stormwater to wastewater the CI can store will decrease. Unless continuous funding and effort are put into building stormwater systems in under-served areas, such as Meola, there will continue to be high numbers of wastewater discharges to the environment, because of the combined sewer network. This will threaten people’s safety, and the ecosystems of creeks, harbours, and beaches.
- In addition, if there is available capacity in the CI for flood water in 2028, it will disappear far more quickly (with more people), as six or 10 or 15 storey buildings are connected into the combined sewer than currently, when many single houses are connected.
- These points strongly indicate the need for increased separation of stormwater to be provided for, over and above that currently included in AC’s current Long-Term Plan.

2023 Storm and Flood Damage in Meola

- The community has experienced first-hand flooding in the Meola catchment during the 2023 flood events. First, serious flooding occurred when it rained. Then for some weeks after when aquifer levels remained high, householders and landowners such as Eden Park tried unsuccessfully to pump out water.
- At least 1000 houses in Meola catchment are identified by modelling to be at risk of flooding. After the 2023 storms, advice is that Meola catchment contained a very large number of badly damaged houses. No map of storm damaged houses by suburb nor by catchment is available, but there are at

least 100 in category 3.¹ Many other householders did not report flood damage, as they feared a reduction of the value of their houses.

- Streets such as Parrish Rd, Mt Eden Rd, Shackleton Rd, and St Leonards Rd, all now contain empty sections where houses have been demolished. Once “bought out” these properties will be owned by Auckland Council.
- AC Future Land Use Policy states that the Council wishes to ensure their land is used effectively to provide homes and maintain strong communities. We request that any land available in Meola catchment should be used to ‘daylight’ creeks, and restore wetlands wherever possible. Further land purchases will be needed, as currently there is insufficient green space available to consider solutions such as that decided upon in Takapuna to mitigate the impact of stormwater flows derived from the Wairau Valley Catchment.

Recharging the Aquifer as a stormwater strategy

- A further, as yet unexplained, environmental change occurred following the 2023 storms. Ground water levels do not appear to have dropped back to pre-2023 levels. We question whether this is related to the cessation of “dewatering”/ pumping at Winstones’ Quarry at Big King, sometime after 2020? Clearly this would increase the size of overflows, and the threats to houses and lives, if floor levels are closer to groundwater than those modelled. It also casts some doubt on the use of the soakage areas to “recharge the aquifer,” posing more potential risks to residents in soakage areas and where springs surface.

Zones in AELB and Meola

- Most of Meola catchment is made up of suburban areas. In the current AUP this is recognised through the use of Residential Mixed Housing – Suburban (MHS). With two storeys and building coverage 40% of net site area, this zoning shows some recognition of special character, and the unsuitability of a basalt area with no stormwater disposal areas available, should further intensification occur.
- PC120 proposes to change zoning in such areas to a mix of Residential Mixed Housing – Urban (MHU), and Terrace Housing and Apartment Block (THAB); (MHU: three storeys, with building coverage 45% of the net site area; and THAB six storeys with building coverage 50% of net site area).
- We do not believe the risks and costs to individual households, from flooding and pollution, have been taken into account sufficiently, in proposing this zoning in Meola Catchment.
- Stormwater accumulates on and is transported across impermeable areas. Meola was 49% impermeable in 2016, with a target of 62.5% in the AUP, a difference of 2 sq km of impermeable surface, and potentially another 1100 Olympic swimming pools of stormwater per year in Meola. What is Auckland Council’s new PC120 stormwater target, given the intended loss of another 10% of permeable area under housing under PC120?
- Albert Eden Local Board land area has low open space areas per head of population by both Auckland and NZ standards. Land use in the catchment comprises 72.2% residential, 8.4% business, 7.4% schools and colleges, and 11.9% open space areas.

¹ <https://ourauckland.aucklandcouncil.govt.nz/news/2025/04/auckland-storm-recovery-moves-into-solution-mode/>

- Social infrastructure: MAGS Headmaster frequently mentions up to 4000 pupils, even before this PC120 intensification. Their land area is constrained; was the 100-year 8 Ha “urban farm” trust missed by central planners? There is no land for new schools.
- Overland flow paths cannot be compromised, as they can cause flooding and extensive water damage to property, infrastructure, and potentially pose a risk to life. There should be no further increase in impermeable area until infrastructure is in place.
- The obvious issues with “pepper potting” tall buildings among bungalows include: reduced privacy, loss of sunlight and natural light, disruption of neighbourhood character, isolation, and strain on infrastructure. These issues pose risks to social cohesion and individual well-being, in an area still recovering from 2023 floods.
- PC120 reinforces the "doughnut city" where much development is focused in an outer ring of the city (Mt Albert, Avondale, Onehunga, Otahuhu etc), rather than closer to the CBD. AC report that the more central urban areas show significant housing capacity increases under PC120, with **Albert-Eden Local Board area (60 per cent increase)**, Waitemata Local Board area (26 per cent) increase.²
- A 60% housing increase in an area with little chance of ever having stormwater infrastructure is unlikely to provide either quality of life, or flood protection. We recommend limiting maximum heights in this catchment to six storeys for all zones, as in dense European cities. This height maintains liveability and important human connections to earth and water at ground level.

Policies and Enforcement

- In the past, local bodies in Auckland have adopted similar policies (to the Combined Wastewater Servicing Constraint), which rely on the Council itself stopping a development. There are large areas of Auckland where “separated” stormwater and wastewater is behaving like Combined sewers. This indicates the ongoing difficulties of achieving compliance when it relies on council bodies enforcing rules. We would support:
 - compliance monitoring which included fines contributing revenue to the separation budget.
 - a continuous improvement clause requiring reducing contaminant discharge into the environment with public reporting every five years. AC HW already has one of these; we believe Watercare should have one too.
 - "net positive" developments (by quantity and quality) whereby water is returned to the environment in a better state than it entered the site.
 - AC focus on reduction of stormwater from roads (generating around 50% of stormwater)
 - AC incenting and actively promoting water sensitive design, and “green” building standards, in sensitive catchments.
 - Broadening awa, and more local methods to reduce/ manage stormwater – by consumers and AC, with law changes as needed, (rather than centralised stormwater systems).

Volcanic character

- Auckland is a city of volcanoes, maunga, lava flows and caves, aquifers, and crater lakes. The ability to see these precious taonga and tipuna, and connections, are important to Auckland's greater identity. View shafts to Maunga need protection. “Mountain to sea” corridors along awa need encouragement, and funding.
- We strongly suggest that awa and wetlands be shown as natural heritage on maps and treated as equal taonga which complement maunga. “Protecting outstanding natural features and landscapes and the natural character of ... **wetlands, lakes and rivers from inappropriate subdivision, use and**

² (<https://knowledgeauckland.org.nz/media/a0znca4y/housing-capacity-modelling-report-auckland-council-technical-report-pc120-october-2025.pdf>)

development³. We ask AC to keep to that commitment in their PC120 decisions. Historically, the evolution of “villages” in Auckland recognised volcanic features. When a flat map is viewed, these features are not apparent. (Echoes of British colonial maps over Albert Park?) The virtual erasure of Mount Albert as a community/ former borough from Ōwairaka to Eden Park, is just one example. Auckland’s planners should view and manage intensification differently. Auckland is not a flat, green fields, rectangular, alluvial area; nor is it New York with an economy and hinterland hundreds of times larger.

Conclusions

- Before any further intensification occurs in the Meola Catchment, there is the need for a major investment in additional infrastructure. More specifically, there is an urgent need first to mitigate- and then to solve- the serious water management and flooding problems.
- The current approach adopted by Council in the Draft Plan identifies some (but not all) of the infrastructure issues involved. PC120 proposes that the need for improved infrastructure be identified as a "Qualifying Matter" that will trigger the requirement for Planning Consent to be granted prior to any further development. This represents an insufficient Council response to the magnitude of the problem, and is unlikely either to manage or solve the problem. We see it as urgent that PC120 address current wastewater and stormwater management issues on a Catchment-by-Catchment basis, in a planned and staged manner. Perform pilot projects in selected areas to test methods and impacts.
- There is therefore an urgent need for Council to adopt a "Whole of Catchment" approach to evaluate impacts of proposed developments/ intensification in the Meola Catchment. There is also an urgent need first to mitigate and then to find a solution to the current unsatisfactory and unsafe flooding conditions. Overall, the problem will require a much better-defined Catchment Management Strategy to be adopted.
- Alternatives include: building stormwater systems in Meola catchment, preferably broadening the area through "blue green networks"; and/ or to apply immediately a more manageable plan of Single house zones throughout Meola catchment.
- Until such a *Strategy* and an *Implementation Plan* is developed for the Meola, significant further intensification should become a *Prohibited Activity*, not merely a '*Qualifying Matter*' to be considered when Council receives an application for a Planning Consent.

³ AUP Natural Heritage B4

Decision sought:

We seek the following decision from Council:

1. Defer any further intensification in the sensitive and vulnerable Meola catchment, until such time as Council has carried out sufficient flood modelling work, to identify technical locations where limited development might occur.
2. Zone all the properties on residential zoned land in Meola Catchment as Residential: Single House zones.
3. Remove THAB zoning in Meola Catchment other than as included in the Operative AUP.
4. Apply Combined Wastewater Servicing Constraint Qualifying Matter, Significant Ecological Areas (SEA) Overlays, and Viewshaft Qualifying Matters across Meola catchment.
5. Revert to a 30-year planning horizon of feasible capacity to allow appropriate intensification where infrastructure is planned and rapid transport is activated.
6. Avoid high-intensity zoning in heritage and Special Character Areas
7. Engage meaningfully with directly affected residents who reside in areas prone to flooding.
8. Any other changes needed to the proposed Plan Change 120 to give effect to the issues identified in this submission. These include the potential use of category 3 buyout land to broaden streams to increase their capacity to act as overland flow paths and perhaps enable them to form part of the *Blue Green Network initiative*.

*We wish to be heard in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

We support the submission of SASOC (Stop all Sewage Overflows Coalition), South Epsom Planning Group, Cabbage Tree Swamp Incorporated Society (CTSI), Fergusson Ave Neighbourhood Group. Also, Herne Bay Residents Association, St Marys Bay Residents Association, Balmoral Residents Association,

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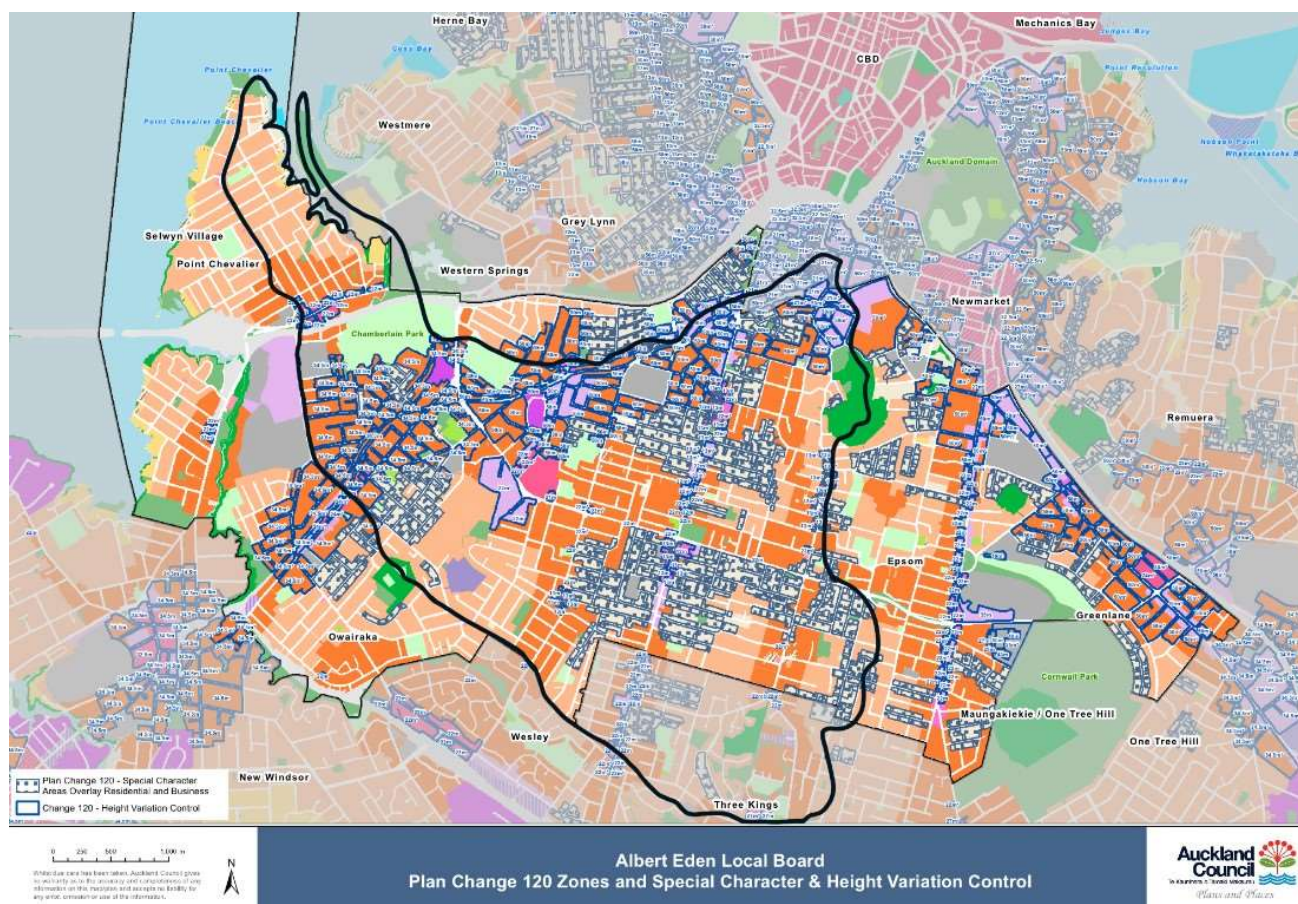
Signature of submitter

Date 19 December 2025

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Appendix:

Map of Meola Catchment and Albert Eden Local Board



This map shows the close alignment of the Albert Eden Local Board boundaries, with Meola Catchment

Meola Catchment

- Meola catchment is the largest catchment on Auckland isthmus, just over 15 sq km. Approximately 100,000 people live here in the suburbs of Mt Eden, Sandringham, Morningside, Balmoral, Epsom, and parts of Mt Albert as per the catchment map.
- Meola catchment is unique in the following ways:
 - Much of its area is a basalt lava flow, and thus very hard and expensive to lay pipes in
 - At least 4000 houses are built to use a “combined sewer system”, meaning the relatively small wastewater pipes have been used to transport combined stormwater and wastewater for a century, and are designed to overflow into Meola creek, up to 200 times a year.
 - Although only 5-7 km long, Meola Creek now transports approximately half the wastewater which reaches Waitemata Harbour, causing creek and beach pollution.
 - There are two main areas where Meola Creek and its tributaries have been buried. One is around Gribblehirst Park, the former Cabbage Tree Swamp. The second is a pipe running from MAGS in Alberton Ave, north to Chamberlain Park behind AIS. Both areas appear in the Auckland Flood viewer as flood prone and on a flood plain.