



Proposed Plan Change 120 - Housing Intensification and Resilience (PC120)

to the Auckland Unitary Plan (Operative in part)

SECTION 32

OVERVIEW EVALUATION REPORT

October 2025

Contents

1	Summary	4
2	Introduction	5
2.1	Scope and purpose of the report	5
2.2	Background	6
2.3	Scope of AHPI	7
2.4	AHPI Context	8
2.5	Preparation of AHPI	10
2.6	Capacity modelling	11
3	MDRS: Issues	12
4	Section 32 Requirements	14
4.1	Level of detail	15
4.2	Benefits and costs	15
4.3	Qualifying Matters / Overlays	16
5	Strategic Context	18
5.1	RMA Reforms	18
5.2	Auckland Unitary Plan	20
5.3	Housing Trends	22
5.4	Changing urban form	27
6	Evaluation framework	29
6.1	Infrastructure capacity as a criterion?	30
6.2	Criteria	31
7	Strategic Options	32
7.1	Add to FUZ	33
7.2	Additional and/or larger walkable catchments.	34
7.3	Increase building height in walkable catchments	35
7.4	Corridors	37
7.5	Qualifying Matters	38
7.5.1	Proposed Qualifying Matters	39
7.5.2	Special Character and Maunga viewshafts	41
7.5.3	Water and Wastewater Constraints	42
7.6	Additional QMs	43
7.6.1	Natural Hazards	43
7.6.2	Coastal Environment	44
7.6.3	Lake Pupuke	44
7.6.4	10 or 15 storey built form	45

7.6.5	Cohesive zoning and Precincts	46
7.7	Modified Suburban Growth	46
7.8	Broad assessment	47
7.8.1	More Future Urban Zone	47
7.8.2	Larger, additional walkable catchments	48
7.8.3	Greater height in walkable catchments	49
7.8.4	Corridor Intensification	52
7.8.5	QMs	54
7.8.6	Modified suburban growth	56
7.9	Summary Table	58
7.9.1	Combined effect of proposed changes.	60
7.9.2	Risks and Uncertainties	62
8	Conclusion	64

1 Summary

This report provides an overview of Plan Change 120 - Housing Intensification and Resilience to the Auckland Unitary Plan (also known as the Auckland Housing Planning Instrument, or AHPI), in accordance with section 32 of the RMA. This report should be read alongside the economic assessment prepared by Market Economics and the various section 32 reports prepared for changes to specific AUP chapters.

The AHPI plan change is to replace Plan Change 78. Recent amendments to the RMA allow the Council to withdraw PC 78 (and the associated Medium Density Residential Standards) provided that a replacement plan change provides the same amount of housing capacity that would have been enabled if PC 78 (as notified) were made operative. In addition to overall housing capacity, RMA amendments also require that specific building heights in the walkable catchments of five western line train stations be amended to allow for 10 and 15 storey developments. The AHPI must also continue to give effect to the National Policy Statement on Urban Development 2020 (Updated 2022).

Better management of natural hazard risks (In particular 'down zoning' of properties subject to high risks) is also proposed through the AHPI.

The AHPI proposes a range of modifications to the AUP to ensure that housing capacity does not fall below the approximately 2million dwelling capacity enabled by PC 78 (as notified). Modelling estimates that the AHPI will provide plan-enabled dwelling capacity of 2,069,708 dwellings compared to PC 78's capacity of 2,073,946 dwellings (resulting in a small deficit of 4,200 dwelling capacity between the two model runs).

The AHPI achieves the 2 million plan enabled capacity through:

- Increased building heights (greater than 6 storeys/22m) in 44 walkable catchments
- Greater intensification options in and around town and local centres
- Enabling more intensive use of sites close to selected frequent transit corridors
- Wider application of an amended Residential - Mixed Housing Urban zone (compared to the AUP).

Qualifying matters (QMs) that limit height and/or density continue to apply where applicable, including Maunga viewshafts and Special Character areas (albeit involving the removal of some Special Character areas around Kingsland and Maungawhau stations). A number of new QMs are proposed, responding to the particular effects of taller, more intensive development on natural resources and public amenities. Because there is a very large amount of plan-enabled capacity relative to demand, effects of QMs on limiting levels of development will in most instances be minimal.

Overall, Plan Change 120 relies more on intensification in and around transport nodes and centres than PC 78 to accommodate future growth. PC 78 had more of a focus on suburban intensification (while noting that the AHPI still enables significant infill and redevelopment options in areas outside of walkable catchments).

This revised mix of development options proposed in AHPI should better achieve core outcomes of a quality, compact urban area that provides for a well-functioning urban environment, while maintaining core features of the urban area that contribute to environmental, social and cultural wellbeing.

2 Introduction

2.1 Scope and purpose of the report

The purpose of this report is to provide an overview evaluation of proposed Plan Change 120 (referred to as the Auckland housing planning instrument or AHPI) in accordance with section 32 of the Resource Management Act 1991 (RMA) and clause 8 of Schedule 3C of the RMA as inserted by the Resource Management (Consenting and Other System Changes) Amendment Act 2025 (the Amendment Act).

Proposed Plan Change 120 is a change to the Auckland Unitary Plan Operative in part (AUP) and proposes amendments within the combined plan to:

- The regional policy statement (RPS);
- The regional plan; and
- The district plan.

Plan Change 120 has two key objectives – it proposes:

1. measures to better manage significant risks from natural hazards region-wide; and
2. an amended approach to managing housing growth as a result of no longer incorporating the medium density residential standards (MDRS), while providing for intensification in a way that complies with clause 4 of Schedule 3C of the RMA by:
 - providing at least the same amount of housing capacity as would have been enabled if Plan Change 78: Intensification (PC78), as notified, was made operative, including by providing for additional intensification along selected Frequent Transit corridors and modifying zoning in suburban areas through an amended pattern of Residential - Mixed Housing Urban and Mixed Housing Suburban zones;
 - enabling the building heights and densities specified in clause 4(1)(b) and (c) of Schedule 3C of the RMA within at least the walkable catchments of Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Avenue and Mount Albert train stations;
 - giving effect to Policy 3 (c) and (d) of the National Policy Statement on Urban Development 2020 (NPS-UD) through intensification in other walkable catchments and land within and adjacent to town and local centres;

- enabling less development than that required by clause 4(1)(b) and (c) of Schedule 3C or Policy 3 of the NPS-UD where authorised to do so by clause 8 of schedule 3C.

The purpose of section 32 of the RMA is to ensure all proposed plans, and changes to them are robust, evidence-based and represent the best means to achieve the purpose of the RMA.

This report provides the strategic rationale for the proposals contained in Plan Change 120 and should be read in conjunction with the economic assessment of the plan change set out in the economy matters section 32 evaluation report.

This report is structured as follows:

- Section 2 sets out relevant background and context for the plan change
- Section 3 identifies the issues with the MDRS
- Section 4 describes section 32 evaluation requirements
- Section 5 scans the regional development context
- Section 6 develops an evaluation framework to assess options for replacement of the MDRS
- Section 7 describes realistic options and considers these options against the evaluation framework
- Section 8 provides recommendations as to the content of the AHPI.

2.2 Background

Auckland Council has determined that a comprehensive plan change that responds to recent amendments to the RMA that relate to the future development of Auckland should be prepared. This plan change will replace those parts of PC 78 that have not been the subject of recommendations on submissions and which have been withdrawn under clause 2 of Schedule 3C of the RMA.

PC 78 was prepared in accordance with the NPS-UD and the then requirements of the RMA. These documents required the Council to:

- enable more development in the city centre and metropolitan centres (“Policy 3a and 3b” areas)
- provide for at least six-storey buildings within the walkable catchments of the city centre, metropolitan centres and rapid transit stops (“Policy 3c” areas)
- enable more development in and around neighbourhood, local and town centres (“Policy 3d” areas)
- incorporate MDRS that enable up to three homes of three storeys in most residential areas in urban Auckland.

The NPS-UD and RMA enabled implementation of qualifying matters (or ‘QMs’) to modify the relevant building height and density of development required by the above policies, to

the extent necessary to accommodate a feature or value that meant full intensification was not appropriate.

PC 78 (and related PCs 79, 80, 81, 82 and 83) were notified in August 2022 with a number of hearings held on different topics between 2023 and 2025. A decision on submissions has been issued for PCs 79 to 83. A decision on the Independent Hearings Panel's (IHP) recommendations on submissions for the City Centre components of PC 78 has been made by the Council. Hearing of submissions has been completed in relation to the Metropolitan Centre aspects of PC 78 while noting that submissions on the New Lynn and Westgate Metropolitan centre precincts have not yet been considered. While recommendations on submissions have been issued by the IHP in relation to Metropolitan Centres, the Council has yet to make a decision on those IHP recommendations.

Other than in relation to the City and Metropolitan Centres, PC 78 is to be replaced by the AHPI. As a result, the AHPI will address Policy 3(c) and Policy 3(d) locations (including clause 4(1)(b) and (c) of Schedule 3C of the RMA – covering five Western line train stations) as well as the broader urban environment. The AHPI will also address the Auckland Light Rail Corridor. This corridor was not included in PC 78. A zoning pattern is now proposed for this corridor.

In addition to providing for intensification of Auckland's urban environment, a key policy platform of the plan change is to introduce strengthened provisions to better manage development in areas subject to natural hazards (such as flooding). The natural hazard response involves changes to the Regional Policy Statement, rural and urban subdivision chapters and related provisions. Down zoning of some properties is proposed to lessen risk profiles.

2.3 Scope of AHPI

The AHPI has been prepared in response to the RMA as amended by the Amendment Act.

In August 2025, the Amendment Act was passed. The Amendment Act introduced a new Schedule 3C into the RMA which sets out a bespoke process for Auckland Council to withdraw PC 78 (including the MDRS component). Schedule 3C permits Auckland Council to withdraw PC 78 in full or in part without ministerial approval. If the Council withdraws PC 78, under the requirements in clause 4 of Schedule 3C of the RMA it must notify a new plan change (the AHPI) using the streamlined planning process to:

1(a) provide at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) were made operative; and

1(b) enable, within at least a walkable catchment of the Maungawhau (Mount Eden), Kingsland, and Morningside Stations

*(i) heights and densities commensurate with the greater of
(A) demand for housing and business use in those locations; or
(B) the amount of housing and business use that is appropriate
given the level of accessibility to commercial activity and*

community services in those locations; and
(ii) in all cases, building heights of at least 15 storeys in those locations;
and

1(c) enable, within at least a walkable catchment of the Baldwin Avenue and Mount Albert Stations,

(i) heights and densities commensurate with the greater of
(A) demand for housing and business use in those locations; or
(B) the amount of housing and business use that is appropriate
given the level of accessibility to commercial activity and
community services in those locations; and
(ii) in all cases, building heights of at least 10 storeys in those locations;

And

1(d) give effect to policy 3.

Clause 4(2) of Schedule 3C of the RMA states that Auckland Council may amend the Auckland Unitary Plan to enable less development than that required by subclause (1)(b) and (c), or policy 3 if authorised to do so by clause 8 (qualifying matters).

Schedule 3C of the RMA also reinstates the ability of the Council to 'down zone' specific areas if required to ensure sustainable management. That is, the application of a less intensive zone that is less enabling of development than previously provided for by the AUP (for example to manage high natural hazard risks). The legislation that put in place the framework for PC 78 did not allow Council to reduce development density to a level that was less than that enabled by the AUP.

2.4 AHPI context

PC 78 considerably expanded housing capacity compared to the AUP. Applying the MDRS and the other components of Policy 3 of the NPS-UD increased theoretical "plan enabled" housing capacity by over 1 million additional dwellings, compared to that of the AUP (taking total housing capacity to approximately 2 million dwellings).

Reduction or removal of the MDRS in light of the requirements of clause 4(1)(a) of Schedule 3C of the RMA therefore necessitates a re-calibration of other forms of urban growth enabled by the AUP (such as urban expansion, suburban infill, more nodal or corridor development) to ensure housing capacity is not reduced.

Schedule 3C's requirement for additional development around the identified 5 western line train stations is one component of the possible response to any removal or reduction of the MDRS but is far from a complete answer.

In relation to the five stations listed in clauses 4(1)(b) and (c) of Schedule 3C, PC 78 did not propose walkable catchments around Maungawhau, Kingsland or Morningside stations in accordance with NPS-UD policy 3(c), nor enable six storey heights. These areas were in the then proposed Auckland Light Rail Corridor. PC 78 excluded the Auckland Light Rail Corridor,

anticipating a Variation to PC 78 once the final route / stations configuration of the corridor was known. A Variation was not notified as a result of central government cancelling the Light Rail project.

Irrespective of the recent RMA amendments, Maungawhau, Kingsland and Morningside stations remain covered by Policy 3(c) of the NPS-UD, as are Baldwin Avenue and Mount Albert stations. Policy 3(c)(i) relates to intensification in walkable catchments around planned and existing rapid transit stops, with building heights of at least 6 storeys to be enabled within at least a walkable catchment of these transit stops.

For Maungawhau, Kingsland and Morningside stations, walkable catchments needed to be defined and within these catchments, QMs identified if present. Baldwin Avenue and Mount Albert train stations (lying outside the former light rail corridor) already have walkable catchments defined through PC 78. The edges of these catchments are refined as part of this plan change. Building height limits will need to be lifted to enable at least 10 rather than at least 6 storey development.

For other walkable catchments, the AHPI builds on work undertaken during preparation of PC 78. The AHPI does not fundamentally modify the approach taken by PC 78 to defining walkable catchments around the city centre, metropolitan centres and rapid transit stops (although the opportunity is taken to 'tidy up' some edges to make for more robust and coherent catchments). The walkable catchment distances defined in PC 78 (800m around Metropolitan Centres and rapid transit stops and 1,200m around the City Centre) are proposed to be rolled over into the AHPI, subject to minor adjustments. Walkable catchments are proposed for new rapid transit stops on the Eastern Busway and the southern rail line. In total, there are now 66 rapid transit walkable catchments identified.

Preparation of the AHPI has included consideration of whether building heights of more than 6 storeys should be enabled in some or all walkable catchments, not just the 5 stations identified in clauses 4(1)(b) and (c) of Schedule 3C of the RMA. This would enable more residents to benefit from the large public investment in the City Rail Link (CRL), providing more efficient travel to and from the City Centre and the employment, health, education and leisure facilities along the rail corridors. Overall, the AHPI identifies 44 walkable catchments where heights are to be enabled beyond 6 storeys (22 catchments are enabled for 15 storeys and 22 catchments are enabled for 10 storeys).

PC 78's approach to intensification around town and local centres is proposed to be largely retained and expanded. 13 centres will have increased development potential in adjacent areas. Areas surrounding 14 centres subject to rezoning under PC 78 are proposed to be extended to enable greater density and height.

The potential to extend intensification along key frequent bus corridors (the Frequent Transit Network) is also considered with a number of corridors identified as being appropriate for intensification.

A key issue with any removal of the MDRS is the nature and extent of suburban infill and intensification to be enabled. Suburban areas (that is, residential areas not within walkable

catchments or within corridors or business areas) will still need to accommodate a reasonable proportion of future growth. The following is proposed:

- Outside of walkable catchments the height limit for land zoned Residential - Terrace Housing and Apartment Buildings zone (THAB zone) is proposed to be altered to provide for 6 (rather than 5) storeys;
- The spatial extent of the Residential - Mixed Housing Urban zone is to be expanded from that of the AUP to better reflect accessibility profiles (but cover less area than was the case under PC 78).

Policy 4 of the NPS-UD provides for relaxation of the Policy 3 intensification requirements of the NPS-UD where specified 'qualifying matters' (or QMs) are present, and less enablement of intensification is necessary to accommodate those QMs. Schedule 3C of the RMA also provides the discretion for Auckland Council to modify the requirements (that is, the building heights set out in clause 4(1) of Schedule 3C) for the five western line train stations to be less enabling of development than required in Schedule 3C if authorised to do so by clause 8 of Schedule 3C.

Any reduction in height or density must only be to the extent necessary to accommodate one or more QM.

In policy 3 and clause 4(1)(b) and (c) areas, the qualifying matters identified in PC 78 are to be largely rolled over into the new AHPI plan change with some new QMs added as outlined below. Roll over QMs include Special Character areas (but which are reduced in extent around Maungawhau and Kingsland stations from that contained in the operative AUP as part of the intensification response to the CRL), Maunga viewshafts and combined wastewater/stormwater control areas.

In terms of new or additional QMs, the Council has sought that better management of natural hazards be incorporated into the AHPI (including down zoning where necessary). Also proposed is a coastal QM limiting height and density increases in those parts of the coastal environment that fall within walkable catchments. A number of changes are made to THAB zone provisions to better deal with the amenity and streetscape effects of taller buildings.

2.5 Preparation of AHPI

Preparation of the AHPI has occurred over a short period of time, within the context of an evolving statutory framework and the evolution of the Resource Management (Consenting and Other Systems Changes) Amendment Bill into the Amendment Act, including substantial changes shortly before its final reading.

Council staff undertook statutory consultation on the draft replacement plan change as required through legislation over August and September 2025.

There has been limited input from Local Boards and Iwi. Time pressures have precluded extensive public engagement. The Council was able to start consultation on 21 August 2025,

the day on which the Amendment Act came into force. It has had to undertake consultation in the context of having to make a decision on whether to give public notice to withdraw all or part of PC 78 and having to notify the Responsible Minister in accordance with section 75A of Schedule 1 for a direction to use the streamlined planning process to prepare the AHPI, by 10 October 2025.

This time period overlapped with local government elections, further limiting opportunity for engagement and decision-making.

That said many of the intensification principles and policies being applied in the AHPI remain as they were for PC78. On this basis, the extensive engagement undertaken during the development of PC78 along with submissions (and some hearings completed) for that plan change has informed the content of the AHPI. In addition, the streamlined planning process will include consultation including with iwi (if not already undertaken).

As noted, the AHPI has two distinct elements, providing for both urban intensification and a strengthened response to natural hazard risks within Tāmaki Makaurau. These two strands have been developed on different timescales, with the natural hazard related work occurring over a longer timeframe as it was originally conceived as a ‘stand-alone’ plan change.

The natural hazard risk elements of the AHPI represent a significant change in policy from PC78 and the currently operative AUP. Engagement has occurred with iwi authorities, individual marae and marae collectives since late 2023. This has included collective and individual engagement, technical and scenario testing workshops, and the commissioning of cultural values assessments (specific to natural hazard risks). This advice has informed the Council policy position on natural hazard responses. These responses include much stronger recognition of Mana Whenua interests in natural hazard assessments and responses, more active protection of Māori Land, Treaty Settlement Land and culturally significant sites, and bespoke relocation provisions for several identified marae and urupā which are likely to be affected by significant natural hazard risks now and in the near future.

2.6 Capacity modelling

As noted, Clause 4 1(a) of Schedule 3C of the RMA requires that the Council amend the Auckland Unitary Plan to *provide at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) were made operative*. Estimating housing capacity under PC 78 and the AHPI has involved extensive, site-based computer modelling of development potential under the two plan changes, taking into account QMs. This modelling has indicated that there is a difference of 4,000 dwellings between the capacity enabled by PC 78 and the AHPI. This 4,000 difference sits within the context of the 2 million dwellings enabled under both PC 78 and the AHPI. Modelling of capacity can take up to four weeks to input data and assemble results.

The PC 78 scenario is based on PC 78 as notified and includes the Auckland Light Rail Corridor and Special Housing Areas (which were excluded from PC 78).

Model inputs have not included the City Centre (in either of the PC 78 or AHPI scenarios). This is because of insufficient time to model the amended, complex provisions arising from council's decision to adopt the independent hearings panel recommendations on the city centre components of PC 78 (which were made operative in June 2025).

The PC 78 and AHPI scenarios include estimated floorspace capacity in Metropolitan Centre zones. Modelling of the capacity of Metropolitan Centre zones under the AHPI scenario has had to rely upon the notified PC 78 provisions as Council has yet to make a decision on the independent panel's recommendations for Metropolitan Centre provisions. A decision on recommendations is likely in November or December of this year.

The new Drury Metropolitan Centre has been included in the AHPI scenario but not the PC 78 scenario, as this capacity became operative since PC 78 was notified. In addition to Drury, there are a number of private plan changes that have recently become operative, but which are not included in the latest AHPI modelling due to them becoming operative after the latest modelling round commenced.

Precincts are not modelled due to the complexity of the numerous place-based provisions contained in Precincts. Precincts can both increase and decrease the development potential enabled by base zonings.

Refer to the 'Modelling Report' for further detail on the modelling inputs, assumptions and process.

3 MDRS: Issues

A key driver of the AHPI is concerns over the on-the-ground impacts from application of the MDRS. As noted, the Council has been given discretion in legislation to retain, remove or modify the MDRS standards from relevant residential zones.

The MDRS standards are similar to the AUP's Residential - Mixed Housing Urban (MHU) zone but offer a more permissive height in relation to boundary standard, greater building coverage, smaller front yard and less landscaping. Combined these create larger, bulkier buildings with the potential to overshadow and dominate neighbouring sites.

The AUP's MHU was applied to around a quarter of the urban residential area. Under the AUP, 46 per cent of residential land is zoned Residential - Mixed Housing Suburban (MHS), 22 per cent is zoned MHU, and another 22 per cent is zoned Residential - Single House (SHZ). Seven percent of sites are zoned Residential - Terrace House and Apartment Building (THAB), the remaining 4 per cent of residential sites are zoned Residential - Large Lot (LL) and Residential - Rural and Coastal Settlement (RCS)¹.

¹ Housing and Business Development Capacity Assessment for the Auckland Region As required by the National Policy Statement on Urban Development 2020 September 2023 Research and Evaluation Unit (RIMU), page 55.

The AUP's MHU zone was seen as a 'transitional' zone, providing for medium density development around centres and along key corridors, providing an intermediate step in height and density between the taller development in centres and the lower rise, less dense development in surrounding suburban areas.

The MDRS were required by the RMA to be applied to most of urban Auckland². Under PC 78, the MDRS were incorporated into a modified MHU zone of the AUP and the spatial extent of this zone was expanded. As notified, PC78 significantly increased the number of MHU zoned sites to 71 per cent of sites zoned residential, followed by a doubling of the amount of THAB sites (14 per cent). As a result, under PC 78, the MDRS applied to the majority of the urban residential area.

The 2023 Housing and Business Development Capacity Assessment (HBA) for the Auckland Region (as required by the National Policy Statement on Urban Development 2020) estimated total gross plan-enabled capacity under the operative AUP as approximately 1.4 million dwelling units (gross) should all residential sites be redeveloped (or 945,561 net dwelling capacity). The majority of the plan-enabled capacity is provided in MHS (43 per cent) and MHU (30 per cent) zones, with an additional 20 per cent coming from THAB zone.

Under PC 78 as notified, the maximum plan-enabled capacity was increased to approximately 2 million dwelling units should the notified plan be adopted as is. The majority of the additional plan enabled capacity is provided in the expanded MHU zone incorporating the MDRS (67 per cent) and THAB zones (28 per cent).

The widespread application of the MDRS has led to concerns about the long-term implications of the form of intensification enabled, such as out-of-sequence infrastructure demands, traffic congestion and reduced urban amenity. These effects vary across the city.

Some intensification has (or will) occur in areas that have physical or financial constraints to improving transport infrastructure, or where 3 waters infrastructure constraints will take time to be resolved. In other cases, the added density will, over time, lead to stronger demand for passenger transport and a wider range of local services and facilities (albeit with a transitional phase in which traffic increases with no countervailing increase in passenger transport services or local amenities).

Urban amenity concerns have been driven by the extent to which development proposals will maximise the building envelope available under the MDRS (particularly the height in relation to boundary standard and increased coverage). This could lead to developments occupying more of a site and seeing new development built closer to neighbours, in some cases affecting sunlight and daylight access or increasing feelings of visual and physical dominance than was the case with the MHU zone before the application of MDRS through PC 78.

A shift over time to a three storey town house/terrace house format being the 'default' housing typology for Auckland, rather than 2 storey infill type housing, is to be anticipated

² MDRS was required to be incorporated into all relevant residential zones by 77G(1) of the RMA.

and reflects the sheer size of urban Auckland and the region's particular geographic characteristics. However, the process of adjustment from 2 to 3 storeys will take time.

PC 78 sought to introduce some additional measures that alleviated some of the more 'strident' outcomes from application of the MDRS, including stronger standards around landscaping and tree cover and common open space in larger developments. PC 79 attempts to rectify some of the transport related aspects of the more intensive forms of housing that could be enabled by the MDRS, such as inadequate pedestrian access in car free developments, poor safety and lighting of common areas and provision of accessible car parking. Fire and Emergency NZ have participated in the plan change as a submitter and interested party, with the aim of ensuring development is more accessible in the event of an emergency, particularly fire. They also submitted on PC78 in relation to ensuring development did not occur where water supply was constrained and could not deliver required pressure for firefighting.

The Council has decided that the MDRS should not be incorporated into the AUP by way of the part withdrawal of PC78. The alternative of amending the MDRS to better address amenity issues was not supported due to the complexity of tying any amendments to QMs. For example, modifying the MDRS height in relation to boundary control so that it was the same as the equivalent control in the MHU zone would likely spark intense debate as to whether the amended control is a valid "qualifying matter".

As noted, the key issue if Council wishes to reduce the extent of the MDRS and/or propose its removal, is that the AUP will need to be changed through the AHPI to 'make up' the reduced housing capacity.

4 Section 32 Requirements

Section 32 of the RMA requires that before adopting any objective, policy or method the Council must undertake an evaluation which examines:

- a) the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA; and
- b) whether the provisions in the proposal are the most appropriate way to achieve the objectives by:
 - i. identifying other reasonably practicable options for achieving the objectives; and
 - ii. assessing the efficiency and effectiveness of the provisions in achieving the objectives.

The evaluation:

- a) must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.
- b) when assessing the efficiency and effectiveness identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for:

- i. economic growth that are anticipated to be provided or reduced; and
- ii. employment that are anticipated to be provided or reduced; and
- c) if practicable, quantify the benefits and costs referred to in paragraph (b); and
- d) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

4.1 Level of detail

Section 32(1)(c) of the RMA states that the level of detail contained in a section 32 evaluation report must correspond to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

For the purposes of section 32(1)(c):

- Scale refers to the scale or reach of the issue (for example, geographical area), the anticipated size or magnitude of the expected effects from the proposal, or both; and
- Significance relates to the importance or impact of the issue (on the environment and/or on the community) that the proposal is intended to respond to, or the significance of the response itself (on the environment and community) i.e. whether it is at a national, regional or local level.

The scale and significance of the AHPI is considered to be high in that the proposed changes affect most of the urban environment of the Auckland Region, while the matters addressed – including housing supply and choice, as well as management of selected natural and physical resources – are important to overall wellbeing.

The AHPI extends to managing natural hazards on urban and rural land with related changes to the Auckland wide rules (E36- Natural Hazards, E38- Urban Subdivision, E39- Rural subdivision). These issues are pertinent to Auckland's ongoing growth and development by managing the risks of natural hazards balanced against the opportunities for intensification.

4.2 Benefits and costs

The AHPI does not seek to amend core RPS objectives and policies that manage growth, at the regional level. A quality compact urban area that is well functioning remains the primary goal.

New objectives and policies associated with natural hazard management are proposed.

In other cases, zone-based objectives and policies need to be updated to reflect changes to key standards, such as building heights in walkable catchments (if adopted) and a modified approach to suburban development.

Watercare have identified the need for new objectives and policies to recognise that in some suburbs the bulk water and wastewater infrastructure capacity may be limited until the bulk networks are upgraded or in some locations, planned and constructed.

Otherwise, the AHIP concentrates on methods (such as changed zoning patterns) to better implement higher order documents like the RMA, NPS-UD and RPS.

In looking at methods, Section 32 requires consideration of a range of costs and benefits arising from a range of options, with these costs and benefits quantified if possible. The analysis set out in this report provides a strategic level analysis of options to address the identified issues. As such the analysis concentrates on the key environmental, social and economic criteria that shape overall growth management in the Region. Quantification is not possible, given the wide range of tangible and intangible values discussed.

4.3 Qualifying Matters

Zoning capacity may be reduced due to the application of QMs or by way of imposition of overlays and controls.

QMs apply to land covered by NPS-UD Policy 3 areas (that is, the city centre, metropolitan centres, walkable catchments and land adjacent to town and local centres). Outside of these areas, limitations on capacity to that which would otherwise be enabled by zoning is achieved through application of existing AUP techniques of overlays and controls.

Specific matters must be addressed if QMs are to be applied. Auckland Council may modify the requirements of clause 4(1)(b)³ or (c)⁴ of Schedule 3C of the RMA and policy 3 of the NPS-UD to be less enabling of development than provided in that clause or policy only to the extent necessary to accommodate one or more of the following QMs that are present (as set out in clause 8 of schedule 3C):

- a matter specified in section 77I(a) to (i)
- any other matter that makes higher density in the train station walkable catchments specified by clause 4(1)(b) or (c) or policy 3 in general, inappropriate in an area, but only if subclause (4) is satisfied.

The matters required to be addressed in the evaluation report for QMs vary according to whether the QM is:

- An "existing qualifying matter", which is listed in section 77I(a) to (i) of the RMA that is operative in the Auckland Unitary Plan when the AHPI is notified

³ enable, within at least a walkable catchment of the Maungawhau (Mount Eden), Kingsland, and Morningside Stations, heights and densities commensurate with the greater of demand for housing and business use in those locations; or the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations; and in all cases, building heights of at least 15 storeys in those locations.

⁴ enable, within at least a walkable catchment of Baldwin Avenue and Mount Albert Stations, heights and densities commensurate with the greater of demand for housing and business use in those locations; or the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations; and in all cases, building heights of at least 10 storeys in those locations

- A new qualifying matter listed in section 77I(a) to (i) of the RMA
- An “other” qualifying matter.

Existing QM

Under clause 8(5) of Schedule 3C of the RMA, the Council may, when considering existing qualifying matters instead of undertaking the evaluation process described in clause 8(2) do all of the following:

- identify by location (for example, by mapping) where an existing qualifying matter applies
- specify the alternative heights or densities (as relevant) proposed for those areas identified under paragraph (a)
- identify in the evaluation report why the Council considers that one or more existing qualifying matters apply to those areas identified under paragraph (a)
- describe in general terms for a typical site in those areas identified under paragraph (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been provided by clause 4(1)(b) or (c) or policy 3
- notify the existing qualifying matters in the Auckland housing planning instrument.

New listed QM

Under clause 8(2) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must in relation to a proposed amendment to accommodate a new qualifying matter listed in section 77I(a) to (i) of the RMA:

- demonstrate why the Council considers:
 - that the area is subject to a qualifying matter; and
 - that the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) or policy 3 for that area; and
- assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- assess the costs and broader impacts of imposing those limits.

New “Other” QM

In addition to requirements in clause (8)(2) described above, under clause 8(4) of schedule 3C should an ‘other’ qualifying matter under clause 8(1)(b) be proposed that has the effect of limiting the higher densities specified by clause 4(1)(b) or (c) or policy 3, the evaluation report must also:

- identify the specific characteristic that makes the level of development specified by clause 4(1)(b) or (c) or policy 3 inappropriate in the area; and
- justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and
- include a site-specific analysis that:
 - identifies the site to which the matter relates; and

- (ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and
- (iii) evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) or policy 3 while managing the specific characteristics.

For AUP Overlays and Controls, normal RMA provisions apply, such as the requirements of section 32 and for relevant plan provisions to give effect to higher order planning documents.

5 Strategic context

5.1 RMA reforms

Preparation of the AHPI plan change is occurring at a time of significant reform of the RMA and housing policy more generally. Central government's Going For Housing Growth programme (GfHG) - See Box 1 - involves a number of different stages, with 'pillar one' focusing on changes to planning frameworks to increase their flexibility and reduce barriers to increasing housing supply. Pillar one included the announcement that the MDRS of Schedule 3A of the RMA will no longer be required to be applied to all relevant residential zones in the Auckland Region, provided housing capacity enabled by the widespread application of the MDRS is not reduced and the additional intensification requirements in clause 4(1)(b) or (c) of Schedule 3C are applied. Council has a discretion as to whether to retain, modify or remove the MDRS, as well as in what way the AUP will be modified to ensure that housing capacity does not fall below PC 78's modelled development capacity.

Box 1: Going For Housing Growth

Pillar One - Freeing up land for urban development

The proposals are:

- New Housing Growth Targets
 - Councils in our key urban (Tier 1) and provincial (Tier 2) centres will need to allow 30 years of housing growth in their district plans.
- Medium Density Residential Standards (MDRS) optional for councils.
 - The MDRS allows three houses of up to three storeys per site without resource consent. They will become optional for councils, once they show how they will meet their Housing Growth Target.
- Making it easier to build both inside and at the edges of New Zealand's cities.
- Strengthening existing requirements for housing intensification.
 - Urban councils will have to intensify housing along 'strategic transport corridors'. They will also have to offset any reductions in development capacity due to reasons such as 'special character' by providing more capacity in another area.
- Rural-urban boundary lines in council plans will be banned to make it easier for new housing to be built on 'greenfields' land (land that's never been built on or

developed before). Councils can still have rural zoning, but they will not be able to set hard regulatory lines that constrain growth.

In March 2025, the Government announced its intention that Pillar 1 of GfHG (apart from optional removal of the MDRS) would be implemented in Phase Three of its resource management reforms when the RMA is repealed and replaced by two new Acts. In-line with this approach, the government announced a ban on new plan changes or reviews, except for Auckland and Christchurch. The RMA Amendment Act enables Auckland Council to propose a plan change that sets out its approach to retention or removal of the MDRS.

Expanding upon the GfHG agenda, a Housing and Urban Development (HUD) June 2025 discussion document⁵ sought feedback on possible significant changes to planning frameworks as part of Phase Three work. In particular, the GfHG document sought feedback on:

- Spatial planning replacing future development strategies. Spatial planning will have strong weight in the formulation of land use plans so strategic decisions made through spatial planning flow through to regulatory decisions.
- A requirement for Councils to enable enough feasible and realistic development capacity to meet 30 years of demand based on high household projections, plus a 20 percent contingency margin, in their district plan.
- Councils being unable to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment.
- Requiring intensification across two new categories of current or planned 'key public transport corridors' as only Auckland and Wellington have rapid transit meaning NPD-UD's walkable catchments have limited application:
 - Category 1 –enable at least six storeys within a walking catchment of key public transport corridors', defined broadly in line with the New Zealand Transport Agency's One Network Framework classification of 'spine' corridors. Spine corridors would be strategically significant corridors where many frequent services operate and many public transport services merge together to create very high frequencies and overall passenger movement.
 - Category 2 –enable at least three storeys within a walking catchment of 'One Network Framework classification of 'primary' corridors. Primary corridors are strategic corridors where frequent public transport services operate, providing regular services across most of the day, seven days a week.

⁵ Going for Housing Growth: Providing for urban development in the new resource management system.

- Set minimum intensification catchment sizes around city and metropolitan centre zones (or equivalent zones in the new resource management system), rapid transit stops and key transit corridors.
- Investigate whether the requirement to enable at least six storeys in specific areas should be increased (for example, to eight or ten storeys) to make more medium-to-high density developments feasible in intensification areas.
- In suburban areas (i.e. outside of walkable catchments), Councils to enable heights and densities commensurate with the greater of the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services or relative demand for housing and business use in that location.
- A requirement that capacity lost as a result of departure from standardised zones and overlays to be redistributed within a different part of the same intensification area or catchment. This could be done by requiring a more intensive standardised zone to be used. Alternatively, Councils could be required to redistribute capacity to an area with an equivalent land value per square metre (plus or minus 10 percent). This is on the basis that land value is a proxy for areas with similar demand and development feasibility, and therefore likely to support similar types of development outcomes.

It must be noted that the above HUD discussion proposals are not in legislation and are subject to feedback and further development. Council does not agree with all of the options put forward in the HUD June 2025 discussion document as reflected in the feedback it has provided.

5.2 Auckland Unitary Plan

The 2016 AUP Operative in Part promotes a quality, compact form of urban growth that provided sufficient commercially feasible development capacity to accommodate 410,000 additional dwellings. The AUP was prepared prior to the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC) but shares many of the main planks of that Statement, including adopting a 30-year planning horizon and ensuring zoning provides sufficient plan-enabled capacity to generate a large enough pool of commercially feasible development opportunities to meet the next 30 years of estimated housing growth.

In making decisions on submissions to the proposed Auckland Unitary Plan, the Independent Hearings Panel enabled significant rezoning compared to legacy plans, with increased residential intensification around centres and transport nodes, and along transport corridors (including in greenfield developments where Future Urban Zone land was rezoned to a "live" urban zone). Objectives, policies, and rules in residential, commercial, and industrial zones were modified to be more enabling of capacity increases (e.g. removing density rules in the residential zones and providing for greater height in some of the centres).

At the same time the Panel recommended that the plan be more explicit as to the areas and values to be protected and maintained by the Auckland Unitary Plan (e.g. viewshafts, special character, significant ecological areas, outstanding natural landscapes, and so forth) and otherwise enable development capacity and consequential change.

This balance between enablement, protection and maintenance essentially reflects the need for the quality of urban environments to be improved as urban density increases, as captured by the “quality, compact” direction of the AUP. In simple terms, less on-site amenity (such as smaller gardens and fewer trees) has to be replaced with greater ‘public’ amenity.

The essential elements of a quality, compact and well function urban environment⁶ approach to urban development incorporated into the AUP are:

- Promoting most growth through intensification within the urban area, while enabling some growth within greenfield areas within the Rural Urban Boundary, towns that act as rural nodes, and rural and coastal towns and villages
- Avoiding urbanisation outside these areas
- Enabling higher density residential intensification in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space
- Providing for medium residential intensities in areas that are within moderate walking distance to centres, public transport, social facilities and open space
- Providing for lower residential intensity in areas:
 - that are not close to centres and public transport;
 - that are subject to high environmental constraints;
 - where there are natural and physical resources that have been scheduled in the Auckland Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, and special character; and
 - where there is a suburban area with an existing neighbourhood character.

Within this overall approach, the AUP (Regional Policy Statement (RPS) Policy B2.4.2(5)) avoids intensification in areas:

- (a) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character; or*
- (b) that are subject to significant natural hazard risks;*

⁶ Introduced into the Auckland Unitary Plan through Plan Change 80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters.

where such intensification is inconsistent with the protection of the scheduled natural or physical resources or with the avoidance or mitigation of the natural hazard risks.

This RPS policy is proposed to be amended by the natural hazards component of the AHPI- changing reference in Policy B2.4.2(5) to the avoidance of the risk from natural hazards where the risk is significant or is necessary to give effect to identified qualifying matters.

Other qualifiers to urban intensification in B2.4.2 are the following RPS policies:

(6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.

(7) Manage adverse reverse sensitivity effects from urban intensification on land with existing incompatible activities.

On the issue of the quality of built environments, the Panel pointed to the challenges of promoting quality in a complex and diverse urban environment such as Auckland through a resource management planning document and recommended a more ‘functional’ approach to urban design and urban amenity.

As expressed in the RPS (Policy B2.3.2(1)), quality development involves managing:

..... the form and design of subdivision, use and development so that it does all of the following:

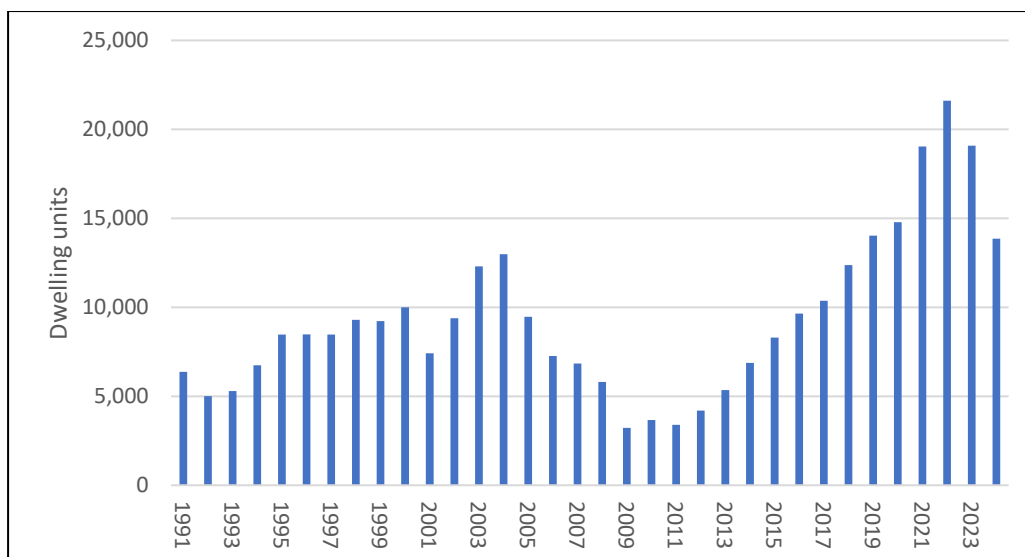
- (a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;*
- (b) contributes to the safety of the site, street and neighbourhood;*
- (c) develops street networks and block patterns that provide good access and enable a range of travel options;*
- (d) achieves a high level of amenity and safety for pedestrians and cyclists;*
- (e) meets the functional, and operational needs of the intended use; and*
- (f) allows for change and enables innovative design and adaptive re-use.*

5.3 Housing trends

Decisions as to how to replace the MDRS need to take into account current trends in terms of housing needs. This is to align with the NPS-UD’s focus on well-functioning urban environments that meet people’s housing needs.

In terms of overall housing production, the Region has accommodated a substantial upswing in housing consents with the AUP in place. See Figure 1. In other words, there is no evidence that, overall, the AUP is constraining housing production.

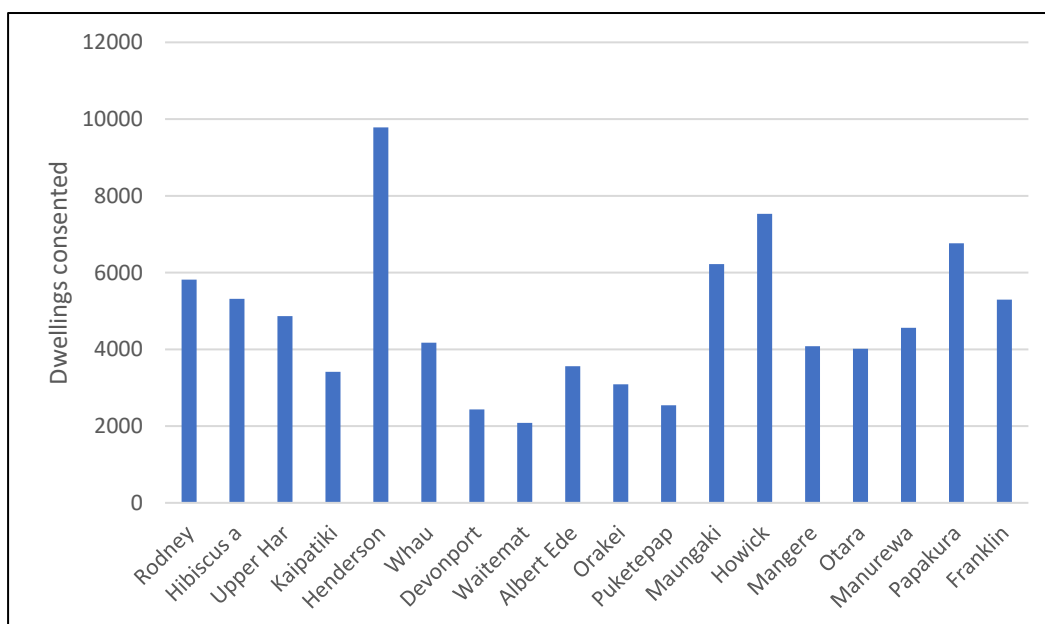
Figure 1: Building consents for residential units 2010 to 2024 (June years)



Source: Stats NZ

Looking at the spatial distribution of dwelling consents over the past 5 years by Local Board area (excluding the non-urban Board areas of Waitakere, Waiheke and Aotea / Great Barrier) shows a pattern of growth in the middle and outer suburbs of the city, with modest growth in central areas. Figure 2 arranges the local board areas along a roughly north-south axis.

Figure 2: Dwelling consents by urban Local Board, 2020 to 2025



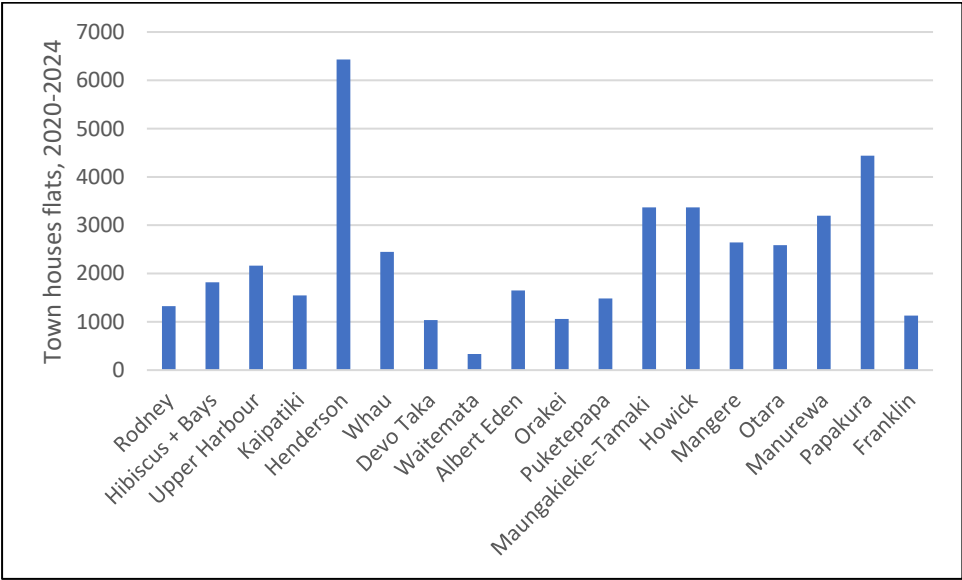
Source: Stats NZ

The emphasis on the middle and outer suburbs may be driven by demand for more affordable housing as well as planning constraints present in the central areas.

In terms of housing types, since 2017 town houses, flats and apartments (the types of housing most closely aligned with the MDRS) have come to dominate the types of housing

consented in Auckland. In terms of spatial patterns, most town houses and flats have been consented in west and south Auckland. See Figure 3.

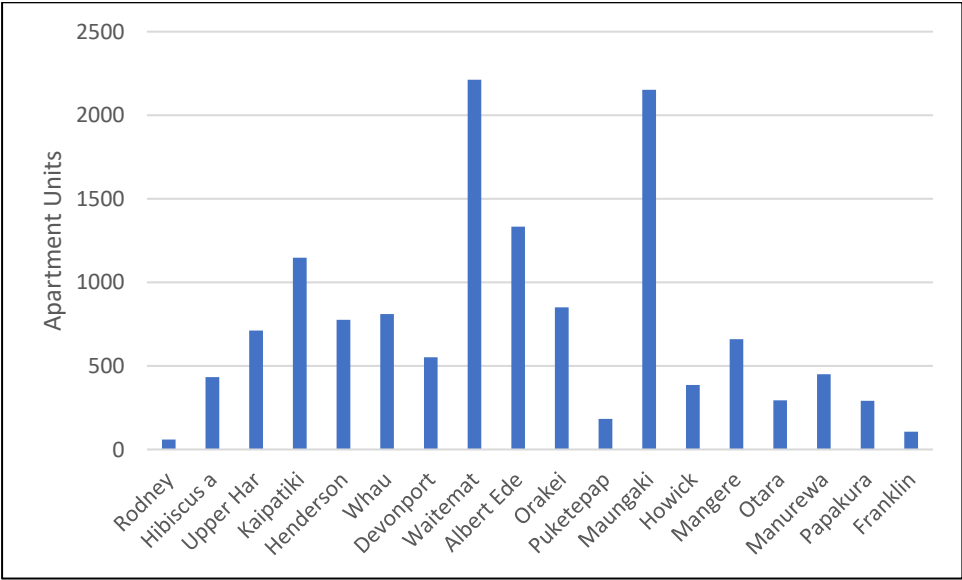
Figure 3: Consents for town houses, flats and units 2020 to 2024, by Local Board



Source: Stats NZ

Apartment developments are most common in the central suburbs, with the Waitemata Local Board area the most popular area. See Figure 4. Apartment developments (including retirement homes) represent about 20% of building consents issued.

Figure 4: Building consents for apartments 2020-2024

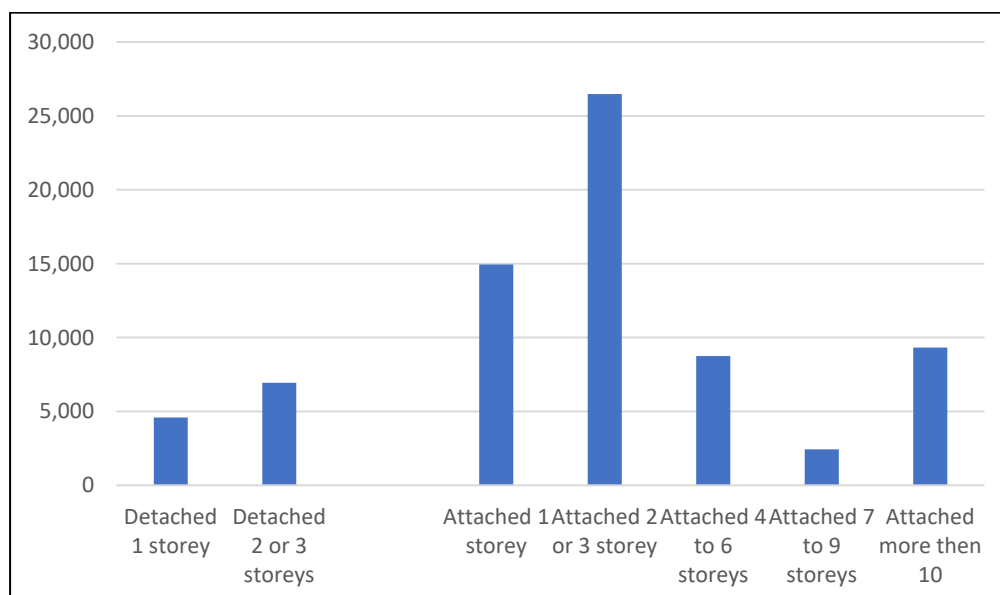


Source Stats NZ

The large number of apartments in the Maungakiekie and Kaipatiki Local Board areas may reflect the (now stalled) urban redevelopment work of Kainga Ora.

Limited information is available on the height of recent housing developments. Figure 5 uses census data on the increase in the number of dwellings by type of dwelling and number of storeys, for the period 2018 to 2023. The most common dwelling type added is 2 to 3 storey attached housing. There is a noticeable increase in the number of attached dwellings in buildings greater than 10 storeys, with a much smaller number in the 7 to 9 storey range.

Figure 5: Change in dwellings by residential building type, 2018 to 2023



Source: Census

Looking at affordability, in terms of build costs (not including land), flats and units are the more affordable typology, based on Building Consent data. This reflects their modest size (floor area).

Table 1: Build costs by type of dwelling, 2020 and 2025

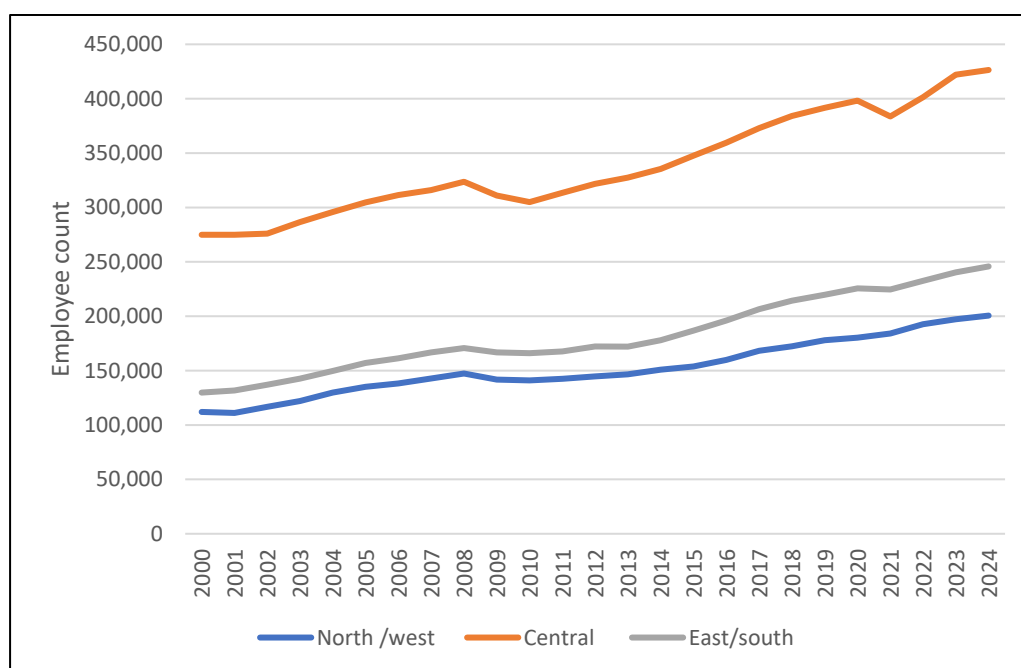
Year	Average floor area (sqm)	Average build cost \$/sqm	Average build cost
<i>Houses</i>			
2020	202	\$ 2,243	\$ 451,910
2025	201	\$ 3,206	\$ 644,748
<i>Flats</i>			
2020	114	\$ 2,260	\$ 256,709
2025	114	\$ 2,919	\$ 332,612
<i>Apartments</i>			
2020	107	\$ 3,327	\$ 355,008
2025	96	\$ 6,377	\$ 614,365

Source: Infoshare

In particular, the costs of apartment developments has increased significantly, with apartments less expensive on a per square metre basis in 2020 than houses, but by 2025, apartment build costs are running at over \$6,000 per square metre.

Turning to employment, Figure 6 shows growth in employment by broad urban sector. The central urban area (covering the Isthmus area) is the dominant location. This is the central business district, as well as areas like Penrose and Mt Wellington.

Figure 6 Employment by urban sector



Source: Stats NZ

Employment has been growing relatively more quickly in the eastern/southern sector, with this area now accounting for 28% of total regional employment, up from 25% in 2000. See Table 2.

Table 2: Share of regional employment, by urban sector

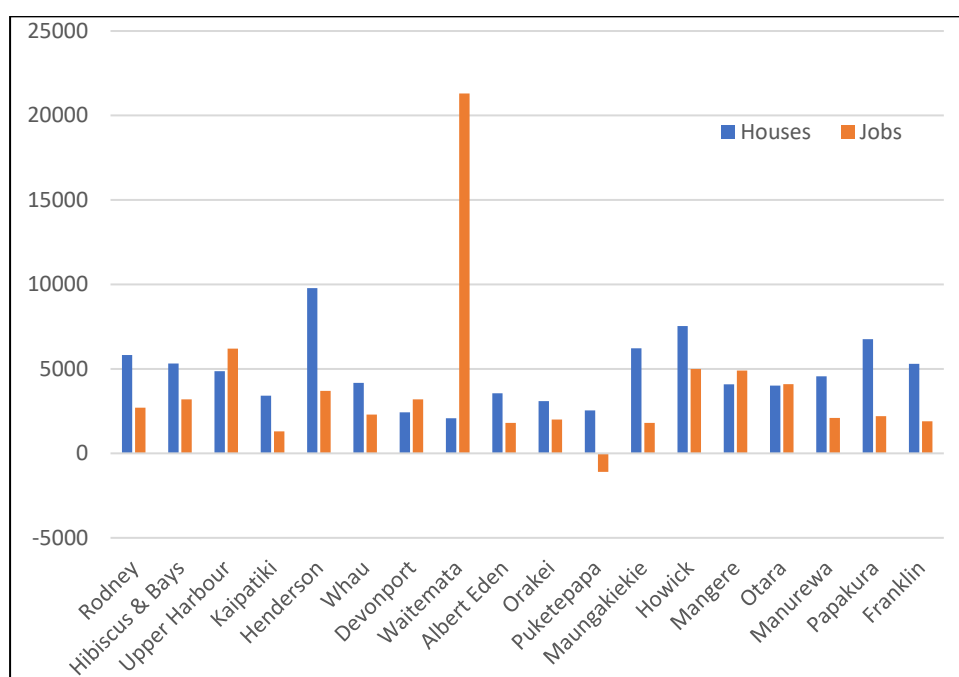
Year	North /west	Central	East/south
2000	22%	53%	25%
2024	23%	49%	28%

Source: Stats NZ

Looking at employment growth⁷ for the five years 2020 to 2024, by Local Board area relative to housing growth, Figure 7 highlights Auckland's complex growth pattern. Areas like Howick and Upper Harbour have seen both strong housing and employment growth. The central Waitemata Local Board area has registered substantial employment growth, but slower housing growth. The 'edge' Local Boards of Rodney, Hibiscus and Bays, Papakura and Franklin have seen housing growth, but more limited employment growth.

⁷ Based on Stats NZ Business Demography data

Figure 7: Growth in jobs/houses by Local Board Area 2020-2024



Source: Stats NZ

Some of the growth in employment in the central Waitemata Local Board area will be a growing cohort of people who work from home for all or part of the week. Census data indicates that up to 20% of residents in the Waitemata Local Board area who are employed worked from home at census day, up from 9% of residents in 2018.

Overall, recent trends in housing and employment suggest the following implications:

- Suburban located intensification of 2 to 3 storeys (town houses, terrace housing) is an important source of housing supply, with the western and southern urban areas being important locations.
- Apartments are concentrated in the Isthmus area, with increasing demand for buildings of greater than 6 storeys. Demand is around 20% of the market, although some demand may be suppressed due to limited supply.
- The region's employment "centre of gravity" is gradually shifting south. While the central Waitemata Local Board area has seen a substantial lift in employment, hybrid work patterns are potentially moderating many traditional travel patterns.

5.4 Changing urban form

The latest high growth population projections released by Statistics NZ⁸ indicate that between 2023 and 2053 Auckland can expect another 950,000 people and perhaps a further 360,000 dwellings.

⁸ September 2025

To accommodate this growth, the AUP adopted a nodal pattern of growth – selected areas across the city were enabled to redevelop to higher densities, particularly around metropolitan centres and rapid transit stops, while suburban areas remained relatively lower density. This pattern sought to address the transport (congestion) effects of significant infill and redevelopment across suburban areas by locating households close to public transport, supporting the viability of the region’s fledgling rail and busway network. The AUP zoned most residential land as MHS, with a similar density enabled across the broad swath of the urban area.

In response to high house prices and perceived slow housing supply responses, the NPS-UD and associated MDRS have sought to modify this pattern by increasing the relative importance of suburban areas in terms of housing capacity and choice.

The NPS-UD and MDRS were conceived as part of an economic view of a city’s urban form. In economic terms the city can be conceived as a series of density rings emanating from the city centre. In simple terms (based on one Australian study⁹):

- Inner ring: include central business districts and neighbouring suburbs. They are typically characterised by pre-war suburbs of distinctive character with good access to employment, public transport and amenity. Central and local government have invested heavily in public transport in these areas. Actual density of housing is often less than would otherwise be supported by high land values.
- Middle ring: typically exhibit less density than inner city areas but often have high density precincts around public transport hubs. Access to employment, public transport and amenity is often more limited than in inner city areas. Many middle ring suburbs are seeing considerable redevelopment as the original housing stock ages (housing from the 1950s and 1960s). Middle ring suburbs have seen considerable infill type development over the 1980s and 1990s.
- Outer ring: are the outermost areas of a city, typically including both established urban suburbs, newly developing greenfield suburbs and surrounding rural areas. They are often characterised by less access to infrastructure, public transport and services, and high dependency on other areas for jobs.

Overlaid on this pattern are the spikes in density around rapid transit stops and metropolitan centres that are a key feature of the AUP (and as reinforced by the NPS-UD’s concept of walkable catchments).

There is no official or commonly accepted definitions of the spatial extent of the above rings. Typically the inner ring may extend up to 5kms from the city centre (as the crow flies), with the middle ring extending from 5kms to 20kms.

⁹ <https://www.infrastructure.gov.au/sites/default/files/documents/bcarr-ring-classification-for-5-largest-capital-cities-in-2021-march-2025.pdf>

While the MDRS were designed to expand housing capacity across the city, Auckland's middle ring suburbs, particularly in the western and southern urban areas, have accommodated a substantial proportion of growth under the AUP. The concentration of growth in the middle ring is not unexpected given the more limited capacity of the inner rings and the transport costs of locating in outer areas.

Inner ring suburbs can accommodate more housing through increased height in areas that lie outside special character areas. This can include former industrial areas (brownfield sites), as well as along the main transport corridors that feed into the central area, like Great North Road.

Options to replace the reduced housing capacity from removing the MDRS need to take into account the relative importance of providing adequate housing choices in the middle ring. But in doing so, growth needs to add to sustainable urban outcomes including avoiding natural hazard areas and strengthening access to, and range of, local services and activities while managing growth related transport impacts such as traffic congestion and parking issues. The availability and capacity of water and wastewater services (and the timing of necessary upgrades) will need to be considered at the "development" stage.

6 Evaluation framework

In relation to accommodating housing growth, the AHPI does not propose to amend any RPS urban growth and form objectives or policies, with its focus being on methods (zoning) and rules that best give effect to the direction set out in the RPS, the NPS-UD and Schedule 3C of the RMA.

Amendments to RPS provisions are proposed as part of the natural hazards response.

Section 32 requires consideration of a range of options to implement objectives, with these options assessed against an evaluation framework which draws its criteria from outcomes set out in the RMA, National Policy Statements and the AUP's RPS.

At a high level, the NPS-UD seeks well-functioning urban environments where zoning supports housing supply and choice so as to provide for peoples' and community's social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Policy 1 of the NPS-UD expands upon the notion of well-functioning urban environments, as follows:

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (a) *have or enable a variety of homes that:*
 - (i) *meet the needs, in terms of type, price, and location, of different households;*
and
 - (ii) *enable Māori to express their cultural traditions and norms; and*

- (a) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (b) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (c) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (d) *support reductions in greenhouse gas emissions; and*
- (e) *are resilient to the likely current and future effects of climate change.*

The AUP RPS operationalises these outcomes as a quality, compact urban form where housing and non-residential development options are tempered by the need to protect and retain valued regional features like Maunga viewshafts, Special Character areas and specified natural resources. There is also a strong focus on locating growth in areas of relatively greater access to public transport.

In essence, the AUP RPS (developed in 2016) seeks to enable heights and densities commensurate with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services. The 2022 NPS-UD brings in a greater focus on meeting relative demand for housing and business uses in most locations.

There can be tension between these two outcomes. Accessibility helps shape demand patterns but is far from the only driver of demand. For example greenfields areas can be in high demand, but have restricted access to public transport, commercial activities and community services (at least in their early stages of development). Opportunities to build housing near suburban hubs and along passenger transport corridors compete with demands to build in quieter residential areas with views, proximity to water or access to open space.

The evaluation criteria reflect this tension, with consideration needed of demand for a particular form of growth, as well as the overall affordability of that option, including likely transport costs, and associated environmental constraints.

The analysis below of options concentrates on a few key criteria, rather than being an exhaustive, detailed analysis. By necessity, the analysis is qualitative in nature, reflecting the strategic issues and limited data. The aim is to highlight the key trade-offs involved.

6.1 Infrastructure capacity as a criterion?

A particular issue is whether infrastructure capacity (physical and/or social infrastructure) should be a separate evaluation criterion. As the AHPI plan change has to deliver the same level of housing capacity as PC 78, overall infrastructure capacity issues will be present in all growth options. The key issue is whether one form of growth or one spatial pattern may generate greater demands on infrastructure than others.

At the time of preparation of this plan change, a detailed assessment of water supply and wastewater infrastructure capacity across the urban area has not been undertaken. Any assessment would need to address a range of contextual factors. For example, in greenfields areas, developers may suggest on-site ‘package’ wastewater systems which are funded by users, but which raise long term maintenance and renewal issues. In brownfields areas, taller buildings may have unique water and wastewater requirements, including the need to ensure adequate water supply and water pressure for firefighting to meet the applicable NZ standards and additional measures due to the volume of wastewater generated by the number of occupants.

As existing water and wastewater infrastructure comes under increasing pressure, careful management of demand, capacity and levels of service is required. In some areas, connections to the bulk water and wastewater infrastructure network may be limited until the networks or treatment facilities are upgraded, or in other locations, planned and constructed. Expanding water infrastructure is not a quick fix, with long lead times and significant investment often required.

Watercare has signalled that objectives, policies and related provisions should be included in all residential zones to require consideration of water or wastewater capacity as part of development assessments, prior to Watercare being approached to approve a future connection. To facilitate early awareness Watercare has published a capacity map showing areas across Auckland where there are limitations on capacity, and the potential timing of upgrades.

Local transport infrastructure can be incrementally expanded as development intensity increases (such as roll out of bus priority measures and better walking and cycling facilities). The overall approach of the AUP is to provide locational choices so households can select locations based on their transport preferences, with a particular focus on increasing housing choices around rapid and frequent transit networks.

Social infrastructure like schools and community centres generally ‘follow’ growth than precede it. This is because of the need for such infrastructure to respond to the particular demographic profile of the growth, such as whether apartment developments are mostly occupied by ‘empty nesters’, rather than school aged children.

6.2 Criteria

Drawing on the above discussion of the RMA, NPS-UD and AUP RPS, Table 3 sets out four key criteria that are used to assess options as to how the AUP should be modified to respond to the withdrawal of PC 78 and removal of the MDRS.

Table 3: Evaluation criteria

Criterion	Discussion
Supports flexible housing supply, can respond to demand signals	NPS -UD, RPS outcome. The combined options must accommodate next 30 years anticipated growth. This is a given. The focus of this criterion is the extent to which the option supports a range of housing choices across the region.
Overall affordability of urban living (transport, housing, infrastructure upgrade costs versus benefits of amenity, range of jobs, higher productivity)	NPS-UD outcome. Option should help to improve urban efficiency by reducing cost pressures and improving urban productivity (which should lead into higher incomes and better affordability).
Quality urban environments	RPS outcome. The 'liveability' of the city and its neighbourhoods is important to the long-term success of the city as a place to live, work and play. As the density of the urban area increases, the quality of the built and natural environment should increase.
Supports / does not undermine recognised qualifying matters	NPS-UD and RPS outcome – key natural and physical resources that support the unique character and identity of the Auckland region should be protected and maintained.

7 Strategic options

This part of the report discusses the strategic options available to address the requirement to provide at least the same amount of housing capacity that would have been enabled if PC 78 (as notified) were made operative. Options broadly cover:

1. Additional Future Urban zone – more urban expansion
2. Additional / larger walkable catchments – more widespread intensification
3. Greater height in walkable catchments – more intense intensification
4. Additional corridors – linear intensification
5. Fewer Qualifying Matters / constraints
6. Modified suburban growth – amended MHU zone.

These options are not discrete, nor mutually exclusive. They overlap and the preferred approach will be a mix, with the main issue being the proportion of each component.

Table 4: Summary Description of Options

Option	Description
Additional Future Urban zoned land (FUZ)	Further urban expansion areas with a Future Urban zoning are identified in addition to those already in the AUP.
Larger, extra nodes	Increase the size and number of walkable catchments, such as larger catchments around metropolitan centres and introduce defined catchments around town centres.
More height in selected walkable catchments	For example, PC 78's '6 storeys' height standard could be increased to 10/15 storeys in selected areas. Some of these areas (Kingsland, Baldwin Ave, Morningside) already have more height mandated in Schedule 3C of the RMA.
Fewer constraints	AUP provisions affecting capacity across the urban area could be reduced, e.g. fewer maunga viewshafts, removal of all or part of special character areas. Note: constraints may be extended, such as better management of natural hazards or a new QM added to manage the amenity/landscape impacts of development in the coastal environment.
Corridors	Additional development potential for areas adjacent to parts of the frequent transit network (i.e. main bus routes not covered by the rapid transit network) through rezoning land to accommodate apartment developments.
Modified suburban growth	MDRS could be replaced with a modified MHU zone that reduces neighbour impacts, such as a more restrictive height in relation to boundary standard. The modified MHU could be applied to a much wider area than the AUP version of the zone, but less than PC 78.

These options are further discussed as follows.

7.1 Add to FUZ

The stock of Future Urban zoned land could be expanded to provide the necessary 'relief valve' to the loss of MDRS capacity, or the conversion of Future Urban land to 'live' zonings could be accelerated.

The AUP identified over 15,000 hectares of rural land for future urban development. Since 2016 about 1/3rd of this stock has been rezoned to enable development.

The RPS recognises the potential for the AUP Rural-Urban Boundary to be modified, subject to a range of criteria being considered, as set out in RPS Policy B2.2.2 (2).

Even if the RUB was extended (or even removed), constraints to expansion like highly productive soils, significant landscapes and ecological areas will remain. Work undertaken as part of the preparation of the proposed AUP evaluated a wide range of greenfields

expansion options. The Future Urban zone land incorporated into the AUP was the land with the fewer constraints. Since the AUP was prepared, more detailed work suggests that approximately 800ha of land should be removed from the Future Urban zone due to natural hazards.

Transport issues arising from further urban expansion are significant – to be sustainable, any further expansion needs to be confined to high-capacity rapid transit corridors (essentially south or west along the rail lines or north along the bus way).

Extending wastewater and water capacity is also problematical due to the delivery of required fixed bulk infrastructure and transmission assets requiring long lead-in times, substantial investment and certainty from the market providing housing in those locations. Currently, growth is not paying for growth, due to the significant cost of the expansion of the bulk networks. Effectively water users across the region are subsidising infrastructure for housing expansion into greenfields areas.

Expanding local employment options is also vital to help moderate commuting and outward travel.

Housing capacity enabled through live zoning of FUZ land can be modest, in the range of 10 to 15 dwellings per ha gross. Up to 50% of FUZ areas can be ‘taken up’ by streams, wetlands, open spaces etc. Net housing densities tend to be in the 20 to 30 dwellings per ha range, most often a mix of standalone, duplex and town house type configurations. Zoning can allow for taller development (apartments) close to proposed centres and future rapid transit stops, but demand profiles may not be sufficiently strong to make apartment development viable in the short to medium term.

7.2 Additional and/or larger walkable catchments.

The alternative to urban expansion is to further support targeted intensification around centres and rapid transit stops, such as through larger walkable catchments and their application to a larger set of centres. Within these catchments, residential land would be rezoned to THAB and a range of building heights applied (as discussed in the next option), unless specific QMs are present (such as Special Character). Business Mixed Use zones in the walkable catchments would be subject to the same height limits as the THAB areas. Other business-zoned land in the catchments such as Local and Town Centre zones could also see height limits lifted above 6 storeys (22m), unless heights are moderated due to qualifying matters like Maunga viewshafts and/or Special Character Business areas.

The RPS supports a network of centres forming a hierarchy. It recognises that this network will adjust over time as the city intensifies and demand patterns change. Policy B2.5.2 (4) provides for new metropolitan, town and local centres which contribute to a well-functioning urban environment.

PC 78 investigated a range of options for the 'size' of walkable catchments, such as 800m or 1200m radius, measured from the transit stop entrances or the edge of Metropolitan Centres, respectively.

PC 78 proposed a 'middle-of-the-road' approach to defining walkable catchments, based on transport and urban form considerations. Too large and walkable catchments could dilute transport benefits of intensification from close access to rapid transit, jobs and services. Equally too extensive and long-term urban form benefits of a concentrated 'cluster' of taller buildings could be replaced by a more 'pepper potted' approach within a larger catchment, with taller buildings intermixed with lower rise buildings. On the other side of the coin, too tightly defined and walkable catchments may stymie redevelopment potential through encouraging land banking.

In addition to, or instead of, increasing the size of the walkable catchments PC78 identified, additional catchments could be defined. PC 78 identified catchments around the City Centre, Metropolitan Centres and Rapid Transit stops. PC 78 also identified up zoning of land adjacent to town and local centres (but did not define walkable catchments around these centres). Land adjacent to 46 town and local centres was identified for intensification under Policy 3(d), 28 of which had land within 200m of a centre rezoned and 18 had 400m rezoned.

A more standardised approach to zoning could be applied to land around all town and larger local centres. For example, all centres (except for a few exceptions) could be subject of re zoning of residential land within 400m metres of the centre.

7.3 Increase building height in walkable catchments

PC 78 lifted 'base' building heights to 6 storeys, or 22m across walkable catchments, to give effect to Policy 3 of the NPS-UD. Submissions to PC 78 sought additional height, for example in the central isthmus and in and around metro centres. The Amendment Act has resulted in a requirement for at least 15 storey buildings being enabled around three inner city train stations and at least 10 storeys being enabled within the walkable catchment of two other train stations on the western line.

In these five catchments, building heights and densities are to be commensurate with the greater of:

- a) demand for housing and business use in those locations; or
- b) the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations.

Consideration of these factors may lead to building heights that are greater than 10 or 15 storeys.

For other walkable catchments (policy 3(c) areas), building heights of at least 6 storeys must continue to be enabled, but there is no specific requirement in the NPS-UD to consider demand or accessibility levels to determine whether greater height should be enabled. However, demand and accessibility are useful matters to inform where additional height could be considered.

The RPS provides general guidance on building heights through reference to a hierarchy of centres that contributes to a well-functioning urban environment and which supports a quality compact urban form.

The hierarchy is described at a regional level through the city centre, metropolitan centres and town centres which function as commercial, cultural and social focal points for the region or sub-regions; and at a local level through local and neighbourhood centres that provide for a range of activities to support and serve as focal points for their local communities.

The AUP generally adopts an approach of building heights stepping up from lower rise suburban areas to higher rise centres in a series of transitions (or steps), rather than abrupt changes. That is, appropriate building heights are a matter of relativity with heights based on the wider context of the area and whether the area is adjacent to lower or higher rise development. While there is no set ratios to guide the size of each step, increments of height in the order of 1.5 help to manage transitions (that is the height difference between each 'band' in the hierarchy should be roughly 1.5; i.e. 6 storeys stepping up to 10 storeys).

At a strategic level and consistent with the principle of a hierarchy of centres, building heights in THAB/ Mixed Use zones in some walkable catchments (not just those catchments listed in the RMA amendment) could be lifted to 10 storeys (34.5m) and 15 storeys (50m), in selected areas, for example.

The concept of a hierarchy of centres lends support to greater heights in walkable catchments that are close to the City Centre (e.g. within the inner ring), as well as around Metropolitan Centres with rapid transit stations (that is, areas in the middle ring with good access to rapid transport). These catchments could be candidates for 15 storey buildings, with the 50m height sitting below the 72m height of Metropolitan Centres and the fringes of the City Centre, maintaining a sense of a physical hierarchy.

Other rapid transit stops in middle ring areas could have a 10-storey building height limit in their walkable catchments, with heights graduated out to 6 storeys for rapid transit catchments in outer ring suburbs.

Local circumstances may modify this general approach.

Heights in town centre zones are governed by Height Variation Controls (HVCs) that set specific heights for each centre. Many of these heights limits enable buildings in the range of 4 to 6 storeys, with some centres having lower height limits due to the presence of particular values such as Business Special Character areas.

The benefit of additional height is to further strengthen the transport and urban form outcomes of concentrated intensification. Extra capacity is likely to be most beneficial in central areas, close to the City Centre and the rapid transit network, reflecting areas of high demand as evidenced by high land values.

The extra housing capacity that may be provided by additional height is hard to judge, given that to realise the additional height, site amalgamation may be required. As noted, apartment developments are expensive to build and the final product is not necessarily 'affordable' to households on median incomes. However, the extra capacity would assist in the delivery of a greater range of housing choices.

As noted above, the impact of additional housing capacity resulting from an increase in building height on water and wastewater infrastructure it connects to has not been assessed. Generally, the inner Isthmus area has fewer constraints than middle and outer areas (due in part to the Central Interceptor) and therefore is more able to accommodate higher densities.

In terms of the built environment outcomes, 6 storey buildings are generally considered to create liveable urban residential environments. Their height creates a 1 to 1 ratio with the width of many streets, allowing for reasonable daylight and sunlight access to streets and public places. Building mass can blend into urban landscapes, with larger trees being of similar height.

Taller buildings do increase potential 'spill over effects' at zone boundaries and in relation to interrelationships with public resources like open spaces, streets and town centres. Above 9 or 10 storeys, a tower form of development becomes the most common form, sometimes with a ground level podium of 2 to 3 storeys. Encouraging 'slender' towers can assist with moderating impacts.

Experience with the AUP is that buildings taller than those enabled by zone standards can be inserted into centres and their catchments provided that heights are tailored to the local context. In other words, the AUP already provides scope for buildings of greater height than zone-based standards to be tested on a site-by-site basis through resource consent processes. Height modulation (either up or down) can also be achieved through Precinct planning, resulting in place specific plan changes and consideration of more detailed guidance as to the appropriate location for taller buildings when resource consent is sought.

Additional building height for some walkable catchments (e.g. 10 or 15 storeys) identified via Height Variation Controls will help to signal to developers and the community areas where taller buildings are likely to be more appropriate at a strategy level, facilitating easier take up of development opportunities. The design of buildings within the height limit is still subject to resource consent.

7.4 Corridors

Corridors are linear forms of development that line the route of a road. They are not a nodal form of development based around a circular walkable catchment. Corridors may, however, overlap with walkable catchments around centres and stations.

The AUP recognises a role for corridors with RPS Policy B2.2.2.(5) seeking to enable higher residential intensification along identified corridors.

To this end, the AUP already identifies a number of corridors (arterial roads) with land adjacent to the road having a MHU, THAB or Mixed Use zoning. This zoning allows for multi storey buildings along the 'edges' of the road corridor. This can provide for housing choices, as well as mixed uses at ground floor.

The number of main road corridors with adjacent land having more intensive zoning could be extended. In Auckland's case, the Frequent Transit Network¹⁰ provides a starting point for selecting additional corridors. In terms of urban form outcomes, important strategic level principles for selecting corridors include:

- Ensuring a reasonable spread of corridor opportunities across the urban area to enable housing choice and variety;
- Avoiding corridors overlapping with other corridors, effectively creating a large spatial extent of apartment development, rather than a linear form;
- Focusing on corridors in the middle ring, where public transport service levels are high and existing urban form already supports a degree of mixed use, mixed density corridors (essentially the former tram routes). However, corridors in the inner and outer rings are also viable options and have been identified.

In general existing corridors in the AUP with more intensive zoning of adjacent land extend one property deep either side of the road. There will be situations where the corridor zoning (such as THAB) would be best extended to be a block depth (such as 200m back from the main road) to better enable redevelopment and improve options for vehicle access that does not require access from an arterial road. Side road access is necessary to ensure that arterial corridors are retained for movement as opposed to direct vehicle access.

7.5 Qualifying Matters

RPS Policy B2.4.2 (4) recognises that lower residential intensity should be provided in areas where natural and physical resources have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment and special character; or where there is a suburban area with an existing neighbourhood character.

PC 78 utilised the option of identifying many scheduled natural resources as QMs. Many of the qualifying matters that were proposed to be included in PC 78 are ones that were rolled over from the AUP, as covered by section 77K of the RMA. Their impact on housing choices is minimal (with the exception of Special Character areas and height controls associated with Maunga viewshafts).

¹⁰ Auckland's Frequent Transit Network (FTN) is a public transport system of bus, train, and ferry services that operate at least every 15 minutes from 7 am to 7 pm, seven days a week, allowing passengers to "turn up and go" without needing to consult a timetable. The FTN includes both Rapid Transit routes, which are physically separated from general traffic (like rail and busways), and other frequently-running services that often utilize traffic priority measures such as bus lanes.

7.5.1 Proposed qualifying matters

The RMA requires that QMs be utilised if Council seeks to modify the requirements of clause 4(1)(b) and (c) of Schedule 3C and policy 3 of the NPSUD to be less enabling of development. In suburban areas, outside of the areas to which these requirements apply (such as land not in Policy 3(c) walkable catchments and Policy 3(d) areas), qualifying matters do not apply. Heights and density of development is a matter for the AUP to address and justify as need be within the context of the NPS-UD and RPS.

Implementation of QMs generally involves application of a resource specific “overlay”. These overlays generally trump the underlying zoning, such as by way of modified (more restrictive) activity status or development standards. In some situations implementation of QMs involves area specific Precinct-based standards.

In some cases a ‘zoning approach’ is taken to implement the QM. A zoning approach involves selecting an underlying zone that best ‘fits’ the intended outcome of the overlying QM. This is to ensure a strong degree of alignment between the outcome sought by the QM and the outcome sought by the underlying zone.

QMs incorporated in PC 78 are largely carried over into PC 120. Table 5 identifies existing QMs (apart from precincts) that merit a zoning response, while Table 6 sets out existing QMs that are implemented by way of controls and standards. A number of new QMs are proposed in the AHPI and these are discussed in the next section.

Table 5: Qualifying Matters – Zoning Response

QM	Zoning Response	Discussion
Special Character Residential	Single House Zone (SHZ)	SHZ reduces development pressures and helps to retain current amenity. AHPI reduces extent of SHZ based on review of the special character values and to respond to planned intensification/government direction particularly within the Maungawhau (Mount Eden), Kingsland and Morningside walkable catchments
Special Character Business	Neighbourhood/Local/Town/Metropolitan Centre Zones	Base zoning remains unmodified but a Height Variation Control is applied to limit height in some Special Character Business areas e.g. 13m, 18m. The plan change reduces the extent of lower heights based on review of the special character values of an area and to respond to government direction in walkable catchments and in business centre zones.
Stockade Hill Viewshaft	Residential Mixed Housing Urban (MHU)	QM limits height, with zoning selected that is compatible with overlay outcome
Height Sensitive Areas (HAS)	Mainly central Auckland,	HSA areas to be downzoned from THAB to MHU (where THAB is located in the HSA areas)

QM	Zoning Response	Discussion
Aircraft Noise Overlay	Mixed Housing Suburban (MHS), Mixed Housing Urban (MHU), Terrace Housing and Apartment Building (THAB)	Manages reverse sensitivity effects, human health effects from noise. MHU, MHS in High Aircraft Noise Area. Some THAB in Flat Bush (in Moderate Aircraft Noise Area)
Sites of significance to mana whenua	Single house zone	Two urban urupa are being responded to by maintaining SHZ over these sites.

The following existing QMs do not affect urban zoning, but can affect the density and form of development:

Figure 8: Existing Qualifying Matters

QM	Spatial Extent	Comment
Local Public Views	Various	Acts same way as overlay
Auckland War Memorial Museum Viewshaft	Part of the city centre	Affects heights of buildings on eastern edge of the central area.
Waitakere Ranges	Waitakere Ranges	Controls development within WRHAA
Historic Heritage	Auckland wide	Historic heritage places are identified in a schedule and their spatial extent (Historic Heritage Overlay Extent of Place) is defined in planning maps . Development of historic heritage places is considered in accordance with its historic heritage values.
Maunga Viewshafts	Mainly central Auckland, but includes some maunga in Mangere	Overlay restricts building height but does not down-zone sites
Designations	Auckland wide	Generally does not affect underlying zones e.g. most MoE schools have residential zones applied
Significant Ecological Areas	Auckland wide	Restricts building/vegetation clearance within SEA
Outstanding Natural Features and Landscapes Overlay	Auckland wide	Controls development within identified features
Open Space	Auckland wide	Applies statutory QM
Notable Trees	Auckland wide	Protects specific trees, requires consent if modification or removal of tree(s) proposed.
National Grid	Auckland wide	Manages reverse sensitivity effects from the electricity distribution network

QM	Spatial Extent	Comment
Combined wastewater network control	MHS ,MHU, THAB, SHZ	Does not affect zoning but requires additional consideration at the time of development/subdivision. Applicants must be able to connect to an existing separated local stormwater pipe that is part of the public stormwater network and WSL needs to confirm that there is sufficient capacity available in the combined network to service the proposal.
Strategic Transport Corridor zone	Various	Provides for state highway and railway corridors
Business Light Industry		Maintains a 22m height limit in Policy 3 areas

PC 78 assessed the overall impact of the above QMs on housing capacity and found that they have a noticeable, but not large effect on capacity. The PC 78 Section 32 report suggested that additional housing capacity (total capacity less existing dwellings) drops from 2.4 million to 2 million dwelling units with QMs implemented. This is a 20% reduction, with MDRS in place.

The economic assessment for PC 120 comes to the same conclusion as was the case for PC 78 with regards to impacts on housing capacity from QMs. The economic assessment concludes that the very large amount of plan-enabled capacity in all locations means there is abundant opportunity for the effects of QMs on enabled capacity to be offset by the capacity available on other sites in the same market and the same value bands as sites affected by QMs. This is because in every local housing market within Auckland (628 local SA2-level markets are identified) there is substantial enabled capacity both on sites unaffected by a QM, and on sites affected by a QM.

7.5.2 Special Character and Maunga viewshafts

The Single House zoning of Special Character areas and limitations on building heights set out in the Maunga Viewshafts and Height Sensitive Areas overlay (or Maunga viewshafts for short) will likely be a particular focus of debate once the AHPI is notified. It is expected that the number of Maunga viewshafts and extent of Special Character will be a focus of submissions, including reducing their spatial extent and associated impact on housing capacity. Being concentrated in the inner ring, these constraints may be seen to have a particular impact on housing capacity.

Special Character is an 'other' QM, being a QM not listed in section 771(a) to (i). The Special Character QM included in PC 78 (and as to be rolled over into the AHPI) was subject to site-specific analysis and evaluation of broader costs and benefits. That analysis remains relevant to the AHPI. PC 78 proposed a reduced area of Special Character compared to the AUP. For

the AHPI, Council is proposing to further reduce the area of Special Character in the three train station catchments identified in Schedule 3C of the RMA for additional height of at least 15 storeys. This is in response to these catchments gaining specific attention due to the substantial accessibility benefits of the City Rail Link.

For Maunga viewshafts, this QM is a matter specified in Section 77I and their inclusion into PC 78 was based in the viewshafts being an existing QM in the AUP. As such there was no need for extensive site-specific assessment of the impact of the QM. Clause 8(5) of schedule 3C retains the ability for this QM to be rolled over without the need for a fundamental reassessment.

7.5.3 Water and wastewater constraints

The adequacy of existing 3 waters infrastructure and the cost and affordability of upgrading this infrastructure to cope with additional growth and intensification is an issue faced by the AUP, the AHPI and PC 78.

Despite RPS policy B2.2.2.1(5)(a) and B2.4.2 (6) generally noting the need to ensure development is adequately serviced with infrastructure prior to or at the same time as residential intensification, the AUP did not put in place any specific mechanism to match housing demand with infrastructure supply (although various techniques are contained in specific precincts).

PC 78 identified a number of areas where density increases were constrained (the MDRS should not be taken up) due to the timing of bulk water and wastewater infrastructure upgrades as identified in Watercare's asset management plans.

In addition to these control areas, PC 78 also identified an Infrastructure – Combined Wastewater Network control area. This applied to residential sites connected to the combined stormwater and wastewater network managed by Watercare that receives stormwater from sites (and in some cases roads). The PC 78 controls recognised that combined wastewater networks currently have capacity constraints and that these networks are in discrete areas across Auckland. In these areas, there is generally no ability for individual sites to connect to an existing separated local stormwater pipe that is part of the public stormwater network. Enabling development which facilitates intensification on these sites has the potential to cause the relevant combined wastewater network to become overloaded, resulting in increased wastewater overflow events, often at times of heavy rain events, when areas are also flooded.

For the AHPI, Watercare have sought that the combined wastewater control of PC 78 continues to apply as a QM to sites in areas with combined wastewater networks (i.e. parts of the inner Isthmus). This control requires an assessment of the effect that intensifying development on a site will have on the network's capacity. The QM recognises that stormwater separation / sewer connections to the Central Interceptor may be in place in the future, at the time of development of some sites, but that this requires assessment closer to the time when the development of the site is proposed.

Instead of including a QM to apply to other sites where there are wastewater capacity issues, Watercare has sought that as part of the AHPI, residential zone objectives and policies are amended, and new provisions included to ensure that assessment of water and wastewater capacity is part of any resource consent process. Watercare are looking to place more emphasis on developers being aware that Watercare is constantly updating information about capacity as new development connects to its infrastructure and places pressure on areas subject to constraints and is encouraging early dialogue with developers to this end. For example, to facilitate this early awareness Watercare have published a map showing areas across Auckland with constraints and potential timing of upgrades¹¹.

7.6 Additional QMs

The AHPI contains a number of new QMs. Four areas where the AHPI is proposing to take a significantly different approach to QMs than PC 78 relate to coastal environments, natural hazards, Lake Pupuke and built form in high rise areas.

In particular, the AHPI proposes a number of 'built form' QMs for the five western line train stations where building heights must be at least 10 or 15 storeys. One set of QMs will manage the zone interface between 10 and 15 storey development in THAB and relevant Business zones and lower intensity residential zones. Other QMs address building form and massing.

7.6.1 Natural hazards

A natural hazards QM that covers flooding, coastal erosion, coastal inundation and landslides is proposed. Similar QMs were proposed in PC78, but the approach to these QMs has changed in the context of PC120. Management of natural hazards including flooding is likely to involve an expanded set of constraints, such as down zoning of areas subject to the greatest risk from flood and coastal hazards and strengthening of AUP provisions for assessing risk profiles of development in hazard areas.

The AUP contains existing objectives and policies which set the direction for the management of natural hazard risk. The AHPI introduces amendments to the Regional Policy Statement as well as changes to Chapter E36 of the AUP. There are supporting changes to other parts of Chapter E Auckland-wide rule, Chapter J Definitions and Chapter M Appendices of the AUP. The key amendments proposed are:

- introduce a new risk management framework that differentiates risk based on likelihood and consequence and applies different policy approaches that are proportionate to the level of risk present;
- updates how areas that are subject to natural hazard risk are identified and ensures that the plan provisions reflect the latest information on sea level rise and climate change;

¹¹ <https://www.watercare.co.nz/builders-and-developers/consultation/network-capacity-in-auckland>

- ensure that land at greatest risk of flooding has a zoning that minimises exposure to risks, such as the Residential Single House zone being applied to sites which would experience very high risks (while noting that Council has ‘bought out’ a number of properties that were severely affected by the 2023 floods).

The above methods will apply both within and outside Policy 3 areas.

7.6.2 Coastal environment

A new coastal environment QM is proposed to help moderate the impact of increased residential densities and taller buildings on coastal landscapes within and adjoining the coastal environment. This QM has been developed in response to the provisions in the New Zealand Coastal Policy Statement 2010 (NZCPS), the Hauraki Gulf Marine Park Act 2000 and the RPS – Chapter B8 objectives and policies that relate to the management and protection of natural character, landscape, amenity and cultural values in the coastal environment.

Apart from outstanding natural character and high natural character areas, the AUP does not spatially define a coastal environment within which specific management policies apply. Rather the plan refers more generally to the characteristics and qualities that contribute to the natural character of the coastal environment (Chapters E18 and E19 of the AUP). Case law, including High Court decisions have said that the approach the AUP currently takes is that the extent of the coastal environment in any particular location is to be established on a case-by-case basis.

AUP Policy B8.3.2 (2) refers to avoiding sporadic or sprawling development in coastal areas by concentrating subdivision, use and development within areas already characterised by development and where natural character values are already compromised.

While this policy supports more development in already developed coastal areas, this approach must be tempered by policies that also refer to preserving the remaining characteristics and qualities that contribute to the natural character of the coastal environment (Objective B8.2.1(2) and Policy B8.2.2(4)), and setting back development from the coastal marine area, where practicable, to protect the natural character and amenity values of the coastal environment (Policy B8.3.2 (7)).

The coastal environment QM will apply to policy 3(c) areas – walkable catchments – and policy 3(d) areas that are proximate to the coastal area. Proposed corridors that are within the same distance of the coastline would also be affected by the new overlay. In these areas, development capacity would be maintained as already provided for in the operative AUP. That is, in these areas, development heights would remain as they were under the AUP. Approximately 1,300 properties across 19 areas are affected by this QM.

7.6.3 Lake Pupuke

A new Lake Pupuke QM is proposed to help moderate the impact of intensification around Lake Pupuke, responding to the Lake’s geological, ecological and landscape significance, as

well as its cultural and amenity value recognised in the AUP. The new measure will operate as QM within policy 3 areas and as an updated AUP constraint outside these areas.

Lake Pupuke is the only lake in the urban environment without an open space buffer on its edge and is subject to intensification through the application of Policy 3 areas around Takapuna Metropolitan Centre and Milford Town Centre.

The Lake is part of the volcanic landscape of the isthmus, being a maar (explosion crater). AUP Objective B4.2.1 (3) requires that the visual and physical integrity and the historic, archaeological and cultural values of volcanic features are protected or enhanced. Policy B4.2.2 (6) and (8) reinforce this objective.

More broadly, Objective B2.3.1 (1) describes a well-functioning urban environment as one which responds to the intrinsic qualities and physical characteristics of the site, including its landscape and heritage.

The extent of the QM is informed by the topographical characteristics of the crater to ensure a built form which is responsive to the natural landform. The QM retains lower intensity zoning of properties which would otherwise be intensified to MHU or THAB on the lake edge.

7.6.4 10 or 15 storey built form

As noted in the discussion on extra height in walkable catchments, 10 and 15 storey development can create a range of “spill-over effects”. Where adjoining boundaries with lower intensity residential zones, particular effects like building dominance, shading, and overlooking of development in the lower intensity zone can occur. The AHPI proposes a specific set back rule where 10 and 15 storey development would otherwise abut lower intensity zones. This standard requires buildings elements above 6 storeys to be set back 18m from the lower intensity zone boundary. The standard provides a degree of protection of the amenity of adjoining sites that are in a different zone.

This standard is identified as a qualifying matter in Schedule 3C Clause 4(1)(b) and (c) locations in that it reduces the extent to which relevant sites can attain the development potential offered by the 10 or 15 storey height limit. In other 10 or 15 storey policy 3 walkable catchments, the standard acts as an AUP constraint, as 6 storey development is still enabled in these catchments.

10 and 15 storey developments can also impact upon the quality of public areas like streets and open spaces. Specific built form standards are proposed that include height in relation to boundary controls, upper floor setbacks, maximum tower dimension and outlook space standards. These standards in combination seek to generate a human scaled podium to the street front and slender tower above that allows light and air in-and-around buildings above 6-storeys, while also helping to manage overspill effects on privacy and overlooking. These built form standards are also proposed in the RMA Schedule 3C, clause 4(1)(b) and (c) locations and will be less enabling of the height and density enabled. Consequently these built form standards have also been identified as qualifying matters that are necessary to

moderate development to achieve a quality, compact built form outcome. Whilst there is a capacity impact from the QMs, the built form standards affect sites in differing ways and the loss of capacity to be enabled is offset taking into account the wider intensification response of PC120.

See the Residential and Business Intensification section 32 report for more detail.

7.6.5 Cohesive zoning and Precincts

Preparation of the AHPI has identified the need for two “administrative-type” qualifying matters to be implemented. These relate to cohesive zoning patterns within policy 3 areas and precinct specific standards that limit development capacity in Precincts that sit within policy 3 areas.

A proposed cohesive zoning QM is to be applied to some Policy 3(c) and 3(d) areas to achieve logical zone boundaries, generally involving single or isolated groups of sites zoned to match the zoning of adjoining areas.

A comprehensive integrated planning QM is applied to limit changes to specific precincts where changes in intensification and zoning patterns specified by Policy 3 of the NPS-UD have the potential to undermine the comprehensive planning and bespoke outcomes sought in these locations.

7.7 Modified suburban growth

As noted in the introductory sections, the bulk of suburban areas (areas outside policy 3 areas) were zoned ‘2 storey’ MHS in the AUP, with MHU covering about 25% of residential areas. PC 78 and the MDRS replaced this with a near city-wide 3 storey format of greater building bulk than the AUP’s MHU.

The AHPI does not include the MDRS. In its place, the former MHS and MHU zones of the AUP could be returned as they were in the AUP, or the MHU zone could be modified to enable greater building bulk and applied to a larger area than was the case under the AUP.

To provide necessary housing capacity (at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) were made operative) , the spatial extent between the two zones (MHS and MHU) needs to be adjusted from that of the AUP. That is, in broad terms, the modified MHU will need to be applied to a wider area than was the case under the AUP. This would also reflect the importance of town houses and terrace house formats in meeting housing demands and reduce the extent to which other capacity options – such as larger, taller nodes or new corridors - are needed to ‘off-set’ lost capacity.

The RPS (Policy B2.2.2 (5) and Objective B2.4.1(3)) foresees greater residential intensification:

(a) in and around centres;

(b) along identified corridors; and
(c) close to public transport, social facilities (including open space) and employment opportunities.

Clause (c) of Policy B2.2.2(5) provides direction as to intensification in suburban areas (i.e. not around a centre or along a corridor). The clause recognises that in suburban areas, access to resources like open space and social facilities is important.

RPS Policy B2.4.2 (3) provides for medium residential intensities in areas that are within moderate walking distance to centres, public transport, social facilities and open space.

A modified MHU zone could 'ease' inter boundary effects (height-in-relation to boundary) compared to the MDRS. The MDRS provided more development capacity to that of the AUP MHU zone as it enabled 3 storeys on a 'typical site' through the height in relation to boundary control of 4m +60 degrees and reduced outlook from a principal living room (from 6mx4m to 4mx4m). A similar capacity outcome can be enabled through the application of the operative AUP Mixed Housing Urban zone's alternative Height in Relation to Boundary control on all boundaries, and a reduction in outlook on the ground floor from 6m to 5m.

7.8 Broad assessment

The following tables provide a broad assessment of the options against the evaluation criteria.

7.8.1 More Future Urban zone

Criteria / Option	Comments – more Future Urban Zones
Supports flexible housing supply	- Increasing diversity of product delivered in new urban areas which is positive for housing supply. - FUZ land can be subject to land banking which can restrict supply options
Affordability of urban living	- Can create high commuting costs, offsetting any housing cost benefits and dampening demand - Infrastructure costs are significant and end user is expected to pay a high contribution. - Needs new and better funding tools to be in place before FUZ is extended
Quality urban environments	Quality of eventual environment dependent upon spatial planning and detailed structure planning and provision of new bulk and transmission infrastructure to service development
Supports / does not undermine recognised qualifying matters	- May put pressure on highly productive land, ecologically sensitive and coastal environments to be identified as future urban - Needs a framework from an updated spatial plan/future development strategy to avoid short term, ad hoc extensions

Identification of additional Future Urban zoned land is a complex process that must be based on updated spatial planning and detailed infrastructure assessments including funding tools. Any housing capacity is contingent upon detailed structure planning and rezoning plan changes being progressed.

The proposed Planning Act may contain measures to strengthen spatial planning and to better co-ordinate expansion with infrastructure capacity. Until these tools are known, it would be unwise to expand the pool of Future Urban land.

This is not a recommended option.

7.8.2 Larger, additional walkable catchments

Criteria / Option	Comments – larger / more walkable catchments
Supports flexible housing supply	• Supports greater housing choices, wider range of housing typologies in walkable catchments, but response can be slow due to need to amalgamate sites • Some extra capacity likely to be taken up by medium density forms of development that do not require site amalgamation but can take advantage of greater building envelope enabled.
Affordability of urban living	• May help with delivery of wider range of housing products that could assist with managing housing/rent costs • May require additional investment in 3 waters infrastructure to provide capacity.
Quality urban environments	• May see a more 'pepper potted' approach to taller buildings dispersed across larger catchments, compared to a more clustered form with smaller catchments.
Supports / does not undermine recognised qualifying matters	• Likely to increase tension between increasing capacity and maintaining QMs.

The NPS-UD specifies that Tier 1 Councils must enable building heights of at least six storeys within the walkable catchments of city and metropolitan centre zones, and existing and planned rapid transit stops (Policy 3(c) areas).

PC 78 undertook significant investigations into how to define these walkable catchments. Walkable catchments around metropolitan centres and train stations were set at a 10 min/800m walk, with 15 minute / 1200m for the city centre.

Larger walkable catchments may not necessarily expand realisable housing capacity, if the expansion is into suburban areas where small lot sizes mean there is a need to amalgamate sites to provide for appropriate building platforms. It is possible that a '3 storey' town house typology will remain the preferred intensification option for many sites around town centres, despite the increased height offered by expansion of THAB zoning. On the other hand, expansion of walkable catchments into mixed use areas may generate more capacity due to larger sites being available.

As an alternative to larger catchments to enable additional capacity, the concept of walkable catchments could be extended to more centres, such as all town centres, for example, (not just the City Centre and Metropolitan Centres). PC 78 expanded THAB zones into land adjacent to some town and local centres. A set walkable catchment was not defined, with rezoning generally being applied up to 200 to 400m distance for the relevant centre, depending upon the local context. Not all town and local centres saw up-zoning of adjacent land, with the relative size of the centre being relevant to those that did see additional THAB zoning. To further expand capacity all town and local centres could see THAB zoning applied to adjacent land within a set distance, such as land within 400m of town centres and 200m of local centres.

The AHPI proposes to add a further 13 town and local centres that will be subject to adjacent intensification. Greater intensification options around more suburban centres will add to housing options 'across the board' and will strengthen urban form and efficiency outcomes at the local level, including raising the 5 Storey height of THAB outside walkable catchments to 6 storeys.

7.8.3 Greater height in walkable catchments

Criteria / Option	Comments – greater height in walkable catchments
Supports flexible housing supply	- Added housing supply options - Demand may be limited to inner city areas - Potential limited take up due to need for site amalgamation
Affordability of urban living	- Proximity to services, retail, amenities and open space can help off-set the added costs of apartment living - May require additional investment in 3 waters infrastructure to provide capacity.
Quality urban environments	Taller buildings need specific design guidance. They are more visible in the urban landscape while particular design attention needs to be paid to interface with streets.
Supports / does not undermine recognised qualifying matters	- Potential conflict with Maunga viewshafts in central areas (where demand for taller buildings will be greatest) - Interfaces with lower height Special Character Areas in inner Isthmus areas needs specific attention.

Greater height in some or all walkable catchments is an alternative to larger catchments and is an option more in line with the Regional Policy Statement's support for targeted intensification.

The AUP already identifies areas where additional height (i.e. more than 22m) is enabled in some catchments through the height variation control. For example, in the Upper Queen Street Business Mixed Use zone, the AUP provides for 32.5m tall buildings. Pakuranga Plaza has a 48.5 m height variation control. These height standards were retained in PC78. PC 78

lifted building heights in all walkable catchments to a minimum of 6 storeys in-line with the NPS-UD requirements.

Any further increase in base heights in walkable catchments (i.e. greater than 6 storeys) would be most effectively directed to catchments where there is demand for taller buildings, such as in inner city areas and land close to metropolitan centres with good accessibility. In these areas tall buildings are more feasible due to the high land values present, as well as providing the opportunity for taller buildings to blend into the city's skyline. That is, the extra height can sit against the backdrop of the taller built forms of the central area or Metropolitan centres (as is emerging around the western fringes of Takapuna, for example). These characteristics accord with the requirement in clause 4 of schedule 3c for heights and densities to be commensurate with the greater of demand or accessibility profiles.

This approach is consistent with the government identifying Maungawhau, Kingsland and Morningside stations' walkable catchments as being appropriate for building heights of at least 15 storeys, with Baldwin Avenue and Mt Albert stations' walkable catchments being appropriate for building heights of at least 10 storeys. This pattern of height decreasing away from the centre could be replicated on the central and eastern train lines, for example Newmarket, Remuera and Greenlane stations' catchments being identified for 15 storey buildings, and Ellerslie and Penrose, 10 storeys. On the eastern line, Glen Innes already has scope for 10 storey buildings.

It is noted that Clause 4 of Schedule 3C refers to building heights *of at least* 10 or 15 storeys. Introducing a 10 and 15 storey height option maintains a stepped approach to building heights, with increases in heights between height bands roughly following a ratio of a 1.5 increase between the bands. See Table 6.

Table 6: Building height steps

Storeys	Building Height (Ms)	Ratio of increase / step between bands
2	8m	
3	11m	1.4
6	22m	2.0
10	34.5m	1.6
15	50m	1.4
22	72m	1.4

This helps to moderate the wider urban form effects of taller buildings. Note, the 11m to 22m 'jump' between 3 and 6 storey formats arises from the requirements of the NPS-UD (for building heights of at least 6 storeys in walkable catchments).

Table 7 lists the walkable catchments selected for 10 and 15 storey development. See the section 32 report addressing the implementation of intensification directions from the Resource Management Amendment Act (2025) and Policy 3 of the National Policy Statement – urban development for more detail on the selection walkable catchments for additional height.

Table 7 10 and 15 storey walkable catchments

15 Storeys	10 Storeys
City Centre	Ellerslie Train Station
Karanga-a-Hape Train Station	Orakei Train Station
Te Waihorotiu Train Station	New Lynn Metropolitan Centre
Waitemata Train Station	New Lynn Train Station
Maungawhau Train Station*	Albany Metropolitan Centre
Parnell Train Station	Penrose Train Station
Newmarket Metropolitan Centre	Smales Farm Bus Station
Grafton Train Station	Puhinui Train Station
Newmarket Train Station	Sylvia Park Metropolitan Centre
Panmure Train Station	Mt Albert Train Station **
Glen Innes Train Station	Sunnynook Bus Station
Manukau Metropolitan Centre	Pakuranga Bus Station
Greenlane Train Station	Baldwin Ave Train Station**
Remuera Train Station	Avondale Train Station
Otahuhu Train Station	Akoranga Bus Station
Kingsland Train Station*	Sylvia Park Train Station
Manukau Train Station	Westgate Metropolitan Centre
Albany Bus Station	Papatoetoe Train Station
Takapuna Metropolitan Centre	Constellation Bus Station
Henderson Metropolitan Centre	Meadowbank Train Station
Morningside Train Station*	Te Taha Wai Bus Station (Edgewater Bus Station)
Henderson Train Station	Williams Ave Bus Station

Current building design criteria and bulk and location standards in relevant zones (such as THAB and BMU zones) need to be adjusted to reflect the particular issues arising from taller buildings. This includes separation distances between towers, daylight and sunlight access 'around buildings' to streets, outlook from the towers and management of the visual 'skyline' issues from taller buildings that will be visible across the city.

The types of measures required to manage the impact of taller towers might include:

Floor Plate Size: The AUPs Business Mixed Use zone controls the size of towers with the maximum dimension of that part of the building above 27m not exceeding 55m. This helps to prevent overly massive towers and ensure a more slender profile, contributing to better light and air circulation.

Massing Controls: Regulations often address tower separations, setbacks, site size, and podium heights to shape the overall form of buildings, such as.

- The minimum distance between towers
- The minimum frontage for a site that can be considered for a tower
- In locations where podiums are supported, a minimum and maximum height of the podium
- The minimum distance between a tower and a property line.

Floor Area Ratio controls: Building mass can also be controlled through Floor Area Ratios (FAR). For example, an FAR of 5.0 allows for 10,000m² of building floorspace over a 2,000m² site. This 10,000 m² floor area can be amassed in a number of ways, such as a five storey building over the 2,000m² site or a 10 story building over a 1,000m² footprint (i.e. 50% of the site).

The AUP used Floor Area Ratio controls in the central area to manage building mass, as well as to assist with the delivery of a range of public benefits (through bonus provisions). PC 78 removed the FAR controls in the City Centre, with the exception of some City Centre precincts due to their effect of limiting building mass in an area where the NPS-UD sought building heights and density of urban form that maximise the benefits of intensification.

The AHPI proposes a revised set of standards for THAB zones, reflecting the different urban form issues associated with different building heights (i.e. 6, 10 and 15 storeys).

In particular, interface standards will set back building elements greater than 6 storeys in height on sites adjoining a lower intensity residential zone at the walkable catchment edge. This new standard is a qualifying matter in Schedule 3C clause 4 areas (the five western line train stations with legislated minimum building heights). The QM helps to provide a stepped profile between the taller buildings in the walkable catchment and the lower building heights in the lower intensity zones.

7.8.4 Corridor intensification

Criteria / Option	Comments – additional corridors
Supports flexible housing supply	• More housing supply options outside of walkable catchments • Limited additional supply added if corridors relatively 'narrow' (i.e. generally one property deep) • Building costs may be higher (e.g. sound insulation, air quality control).
Affordability of urban living	• Focus on FTN corridors helps encourage bus use, walking and cycling if infrastructure upgraded • Support mixed uses which should benefit residents in the wider area being able to access more local services and jobs • May require additional investment in 3 waters infrastructure to provide capacity.
Quality urban environments	• Liveability, health issues living adjacent to busy arterial roads need to be addressed (noise, air pollution etc) through building design. • Proliferation of vehicle access along arterial roads undermining movement function.

Criteria / Option	Comments – additional corridors
	Taller buildings along corridors can help to block noise and other effects experienced by dwellings that occupy side streets
Supports / does not undermine recognised qualifying matters	Can work in with QMs due to linear nature of corridors.

The option of additional corridors (i.e. intensification along some Frequent Transit Network – FTN - routes) has some advantages in terms of additional housing supply and choice. However, demand for such locations is likely to be tempered by environmental and amenity conditions. Added density could see the proliferation of vehicle accesses onto the arterial which could undermine the corridor’s movement function.

The option of ‘corridor living’ is proposed to be extended to a number of FTN corridors through the plan change.

Corridors have been selected using the following criteria:

- Residential land value (as a measure of demand)
- Accessibility based on the Council’s Framework for Urban Access model
- The number and size of centres which occur along the length of a corridor.
- Bus frequency along each corridor.

The selected corridors are listed in Table 8. See the section 32 report addressing the implementation of intensification directions from the Resource Management Amendment Act (2025) and Policy 3 of the National Policy Statement – urban development for more detail on the selection of the identified corridors.

Rezoning along corridors will affect land zoned Single House zone, and Mixed Housing Suburban and Mixed Housing Urban zones. These zones will be rezoned to THAB (6 storeys), subject to any qualifying matters.

The depth of the corridor should be limited to accentuate the linear urban form, and to limit the spread of taller development down side streets (where the corridor is not within a town centre or walkable catchment) while still enabling side street access.

Table 6: List of corridors

Onehunga - Newmarket (Manukau Rd)
St Johns - Remuera - Newmarket
College Hill and Ponsonby Road
Ellerslie - Greenlane
Great North Road (Ponsonby to Motat)
Greenlane - Newmarket (GSR)
St Lukes to Great North Rd (via Morningside and Kingsland)
Great North Road (Pt Chev, Avondale, New Lynn)
Panmure - Ellerslie
Sandringham Rd (Newton to Sandringham)
Smales Farm – Takapuna – Milford
Dominion Road (Mt Eden to Mt Roskill)
Mt Eden to Three Kings (Mt Eden Rd)
New Lynn to Henderson
Greenlane - Western Springs (Via Balmoral)
Greenlane East (Remuera Rd to Greenlane)
Mt Eden to Sandringham Rd via Valley Rd Shops
New North Road (Morningside to Avondale)
Northcote – Takapuna
Panmure - Mt Wellington - Sylvia Park
Botany to Manukau (via Ormiston)
Glenfield - Birkenhead
Howick to Botany (via Meadowlands, Botany Rd)
Papatoetoe - Otahuhu - Sylvia Park
St Marys Bay to Ponsonby
Verrans Corner to Onewa Road

7.8.5 QMs

Criteria / Option	Comments – Fewer QMs
Supports flexible housing supply	- Fewer QMs likely to increase housing and business supply options in central, inner-city areas - New QMs like coastal environment and flooding are region wide and therefore impacts on sub regional housing capacities will be muted (i.e. impacts are not concentrated in one area).
Affordability of urban living	- Increased supply options from fewer QMs may help to moderate housing price increases in central areas, but a less 'characterful' urban area needs to be balanced against impacts on economically agile residents who may shift out of Auckland if the urban area becomes less attractive - May require significant investment in 3 waters infrastructure to provide capacity and avoid overflows.

Criteria / Option	Comments – Fewer QMs
Quality urban environments	Fewer QMs will over time lead to a lessening of distinctive features of the Auckland urban area which may reduce Auckland's comparative advantages over other cities.
Supports / does not undermine recognised qualifying matters	- Could lessen the overall weight to be given to QMs if their role on shaping urban form is substantially reduced through their reduction. - Loss of critical mass and gradual erosion of values.

The option of fewer qualifying matters is often raised as a means to assist with adding housing capacity. The most often cited candidates are reduced areas of Residential Special Character and removal of selected Maunga viewshafts.

Removal or reduction of QMs, particularly in central areas where their impact on capacity is visible in the urban form of the area is, on the surface, an attractive 'easy win' for housing capacity. However, there are long term costs to the region's cultural heritage values, character and identity from doing so.

As identified by the government's GfHG programme, the alternative to reducing the extent of QMs is to ensure that there is some compensating capacity created elsewhere in the general area. For example, the economic assessment notes that there is sufficient capacity in inner areas to accommodate growth demands, even with Maunga viewshafts in place.

Removal of Maunga viewshafts is not supported on several grounds:

- Irreversible loss of heritage and landscape values
- removal of Maunga viewshafts would be contrary to Auckland's co-governance arrangements it has in place with the Tupuna Maunga o Tamaki Makaurau Authority.
- It may breach Crown and Council obligations following the 2014 Treaty of Waitangi Settlement¹².
- The PC 78 Independent Hearings Panel accepted the identification of the Maunga Viewshafts Overlay as a QM under ss 77O(a) (s6 matters of national importance) and s77O(h) (iwi participation).

In regard to the value of the retention of viewshafts, it is noted that Maunga viewshafts are strongly supported by Regional Policy Statement provisions and link intimately to stated Iwi values. Viewshafts are a longstanding policy that seek to retain one of the more distinctive features of the region's urban environment.

The economy matters section 32 evaluation report identifies that with Maunga viewshafts in place, there is a potential to increase built capacity in the neighbourhoods affected by viewshafts to 325% above the current level of development. The analysis identifies that the impacts on limiting development capacity will be very marginal in areas with a high

¹² Nga Mana Whenua o Tamaki Makaurau Collective Redress Act 2014

incidence of Maunga viewshafts. Projected growth in dwellings would see around 18% of the remaining plan-enabled capacity taken up by 2055, and 38% by 2085.

Special Character areas seek to retain and manage the special character values of specific residential and business areas identified as having collective and cohesive values. The physical attributes that define, contribute to, or support the special character of the area include:

- (a) built form, design and architectural values of buildings and their contexts;
- (b) streetscape qualities and cohesiveness, including historical form of subdivision and patterns of streets and roads; and
- (c) the relationship of built form to landscape qualities and/or natural features including topography, vegetation, trees, and open spaces.

The economy matters section 32 evaluation report identifies that in walkable catchments and Policy 3d areas affected by Special Character areas, there are 41,298 existing dwellings, and net additional capacity for a further 109,883 dwellings. Built capacity can therefore be increased by 266% above the current level of development in these areas. Projected housing growth would see around 21% of the remaining plan-enabled capacity taken up by 2055, and 43% by 2085. In other words the implications of limiting development capacity will be very small in areas with Special Character.

7.8.6 Modified suburban growth

Criteria / Option	Comments – modified suburban growth
Supports flexible housing supply	Assists with supply of medium density developments, a type of development that is popular and affordable.
Affordability of urban living	- Assists with moderating housing costs. Transport costs / effects can be managed by focusing on areas with accessibility to a range of services and activities - Likely require additional investment in 3 waters infrastructure to provide capacity.
Quality urban environments	- Will see a continual change in neighbourhood character as sites are redeveloped for 3 storey developments - Increased growth-related transport impacts such as traffic congestion and parking issues.
Supports / does not undermine recognised qualifying matters	- Could increase pressure on some natural resource, such as sites that border significant ecological areas - Natural hazards need specific response through zoning and policy frameworks.

Not incorporating the MDRS (as per PC 78) and reverting back to the spatial extent of the AUP's MHU zone generates a large capacity shortfall with respect to the requirement in clause 4(1)(a) of Schedule 3C for the AHPI to provide at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) were made operative. Adjustments to building heights in walkable catchments and extension of corridor typologies

go some way to rectifying this capacity shortfall. However significant capacity will still need to be provided in suburban areas to off-set the loss of capacity from removal of the MDRS.

Adjusting the building standards that apply to the AUP's MHU zone (such as utilising the more generous height in relation to boundary control provided by the alternative height in relation to boundary standard) will enable some more capacity compared to the AUP, but less than PC 78.

Making up the shortfall with removal of MDRS requires the wider spatial application of the MHU than as contained in the AUP. That is, the MHU zone (which enables 3 storey dwellings) needs to be extended over a larger area and the MHS zone reduced in area, compared to the AUP.

At a conceptual level, the AUP conceived the MHU zone to be a transitional zone that stepped development down from taller development in centres and associated THAB / BMU zones to lower development in the predominant MHS zone. The above analysis shows that the MHU zone needs to take on a wider role than just as a transitional zone. The MHU zone needs to be seen as the zone that is most appropriate for the 'middle ring' of suburbs. That is, outside of the walkable catchments around centres and rapid transit stops and in areas where AUP Overlays do not need a zoning response (such as Special Character or high risk flood areas), the MHU zoning should be the default zone for a large part of the urban area.

To help determine the spatial extent of the MHU zone, Council has utilised a spatial analysis tool that helps rank the relative accessibility of suburban areas to a range of common social, work and community activities by a range of modes¹³. Areas with relatively good access are identified as being appropriate for MHU zoning, while areas of relatively lower accessibility are zoned MHS. In general, middle ring suburbs having relatively good accessibility, while outer ring have somewhat lower accessibility. See the section 32 report addressing the implementation of intensification directions from the Resource Management Amendment Act (2025) and Policy 3 of the National Policy Statement – urban development for more detail on the accessibility tool.

Further capacity in suburban areas is enabled through adjusting the '5 Storey' height of THAB outside walkable catchments to 6 storeys. Where a town, local or neighbourhood centre is surrounded by 6 storey THAB, then the relevant Height Variation Control for these centres is increased to 22m to match the THAB height (unless a QM suppresses heights, such as Special Character Business notation).

In conjunction with expanded opportunities for extra density around town and local centres, the MHU zone has the potential to improve the sustainability of many suburban areas through supporting greater housing diversity and affordability and improving the range of local services and activities.

A cohesive zoning type approach has been applied to suburban areas (outside of Policy 3 areas) to ensure logical boundaries where there are planning constraints that leave isolated

¹³ Framework for Urban Access

zonings (particularly around the coastal edge and in gully areas). This creates more coherent areas of MHU, MHS and THAB zones.

7.9 Summary table

Table 9 sets out a very simple rating of each option against the evaluation criteria. The relatively simplistic approach reflects the strategic nature of the choices and the need to identify and consider key trade-offs. The table uses the following rating framework:

	Supports criterion
	Limited effect / benefit
	Does not support criterion

Table 7: Summary Analysis

	More FUZ	Bigger walkable catchments	Extra height in catchments	More corridors	Fewer QMs	Mixed suburban growth
Supports flexible housing supply						
Affordability of urban living						
Quality urban environments						
Supports / does not undermine recognised qualifying matters						

As noted above, infrastructure capacity issues have not been taken into account in the evaluation.

The more favourable options to respond to the removal of the MDRS and continue to implement the NPS-UD are extra height in some walkable catchments; more corridors and a modified approach to suburban development. Secondary benefits will come from extending intensification opportunities around town and local centres.

Expansion of the urban area by increasing the amount of land zoned Future Urban (i.e., more 'FUZ') is not supported. Neither is the widespread reduction of QMs. Some new QMs are proposed, such as flood hazard management. These reduce capacity to an extent. Retaining and adding QMs is justified on the basis of maintaining liveability and protecting health and safety as the urban area intensifies. Additional height in walkable catchments is preferred to expanding walkable catchments.

The 'three pronged' approach to capacity of greater height, more corridors and modified suburban growth accords with and is in alignment with the broad direction set by the NPS-UD and RPS.

As noted, at a strategic level the NPS-UD seeks to enable heights and densities commensurate with the greater of either:

- a. the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services
- b. relative demand for housing and business use in that location.

The AHPI (and the AUP) finds a balance between these two outcomes (demand and accessibility) through a mixed approach to growth:

- The plan change provides for some additional capacity where the two outcomes – good accessibility and high demand - overlap, such as inner-city areas. This can be achieved through increasing building heights for multi storey developments in selected areas, while retaining valued features (like Special Character areas and viewshafts).
- In areas where there is moderate demand and less accessibility (such as many "edge" or outer suburban areas), housing supply is moderated to an extent to match accessibility. These are the areas where MHS zoning is to be reinstated, for example, while no further urban expansion is proposed.
- In areas where there is relatively good accessibility and/or accessibility is being improved and demand is growing, the AHPI puts in place a framework that assists with enabling a range of development options in these areas. For example, in 'middle ring' suburbs, PC 78's approach to walkable catchments around train stations will remain. Corridor forms of growth and some expansion of density around town and local centres will add to development options. A modified MHU zoning applied over a larger area than that contained in the AUP will strengthen housing options and provide necessary capacity.

Under this approach, suburban areas (areas outside walkable catchments) will still accommodate a significant proportion of future growth. This is through the modified MHU zone which is applied to a larger area under the AUP, but a smaller area than under PC 78.

The need to provide for capacity in suburban areas reflects demand to locate in such areas; the relatively more affordable housing product that can be delivered as well as the uncertainties around demand to live in more intensive higher rise environments in walkable catchments and along corridors. Long term displacement (relocation) of demand away from

natural hazards and the constraints on development generated by qualifying matters like Maunga viewshafts and Special Character areas will also see demand increase for 'suburban' areas that are relatively free of constraints.

In contrast to PC 78, the amended MHU will better address these pressures. Capacity will be located in areas accessible to a range of services and activities, while the development standards will help to moderate the nature of change to be experienced in neighbourhoods as they transition from a 2 to 3 storey format.

7.9.1 Combined effect of proposed changes

October 2025 modelling of the combined effect of the above adjustments to zoning and development standards sees housing capacity almost the same as that which was enabled by PC 78.

As set out in the economy matters section 32 evaluation report, the total additional plan-enabled dwelling capacity is estimated at 2,073,946 dwellings under the PC 78 baseline scenario, and 2,069,708 under the PC120 scenario.

Modelling indicates that net dwelling capacity in residential zones decreases from 1.59 m units to 1.48 m dwelling units. This is a 6.7% reduction as a result of the removal of the MDRS and introduction of a modified MHU and expanded capacity (i.e. extra height) in THAB zones. In business zones, dwelling capacity increases from 478,606 to 581,878. This lift in capacity does not fully off-set the reduction in residential zone capacity. Overall, there is a small, modelled shortfall between the PC 78 baseline and the proposed AHPI (of 4,000 dwellings).

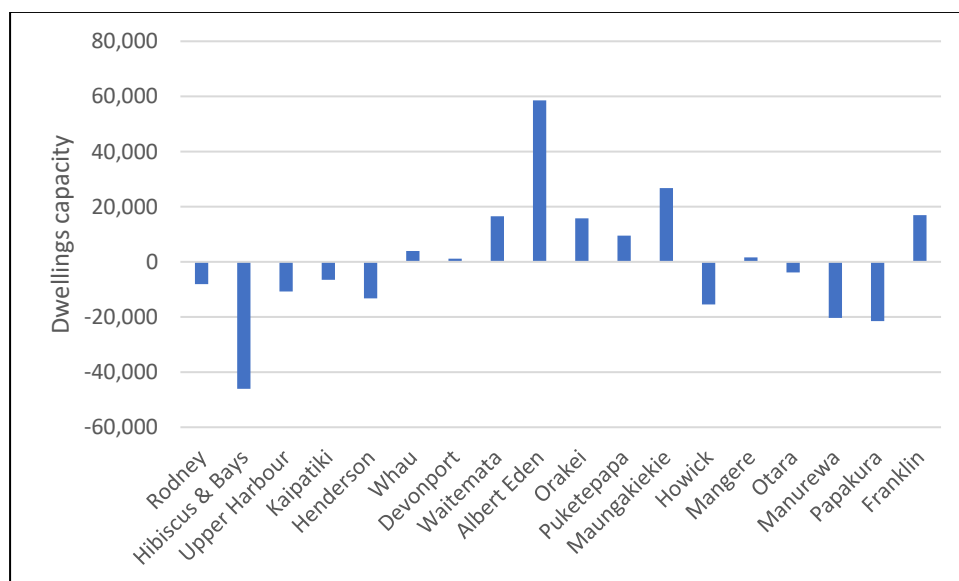
The small shortfall in capacity between the PC 78 baseline and the AHPI is not considered to be material in terms of the requirements of clause 4 of Schedule 3c of the RMA, given that the modelling does not take into account capacity in the city centre; metropolitan centre zones capacity is based on notified PC 78 parameters (as a result of the relevant decisions on PC 78 provisions for metropolitan centres recently being issued by the hearings panel, but not yet confirmed by council); as well as a number of private plan changes recently becoming operative but which are not included in AHPI modelling due to time constraints.

In built form terms, the business zones see substantial change, with net plan enabled floor space growing by 28 million square metres when the AHPI is compared to PC 78 (not including the central city). Assumptions about the proportion of this additional floor space that will be taken-up by residential units and the average floor area of these units moderate the extent to which this additional business floor area will flow into extra housing capacity. Different assumptions (such as a greater proportion of the extra business floorspace in high rise development going to residential units and smaller average dwelling unit sizes) could see housing capacity increase, further closing the gap between housing capacity under PC 78 and the AHPI.

In spatial terms, compared to PC 78, housing capacity has been increased in the central local board areas of Waitemata, Albert-Eden, Orākei and Maungakiekie-Tāmaki, with the

Waitematā local board area seeing an 16,500 increase in plan-enabled (gross) housing capacity and 58,500 in Albert Eden, across residential and business areas. Maungakiekie-Tāmaki sees a 27,000 increase in capacity. There are corresponding decreases in capacity in the peripheral local board areas like Upper Harbour (-11,000), Hibiscus and Bays (-46,000); Howick (-15,000); and Papakura (-21,000). See Figure 9. This pattern of greater enablement closer to the centre of the city and less capacity on the fringes is positive for urban efficiency but occurs within the context of substantial housing capacity across all local board areas.

Figure 9: Difference in housing capacity by Local Board area, PC 78 baseline versus AHPI



Source: Auckland Council capacity modelling

For example, while the Henderson-Massey Local Board area sees a reduction of capacity of 15,000 dwellings when PC 78 is compared to the AHPI, the total capacity in the local board area is estimated at 201,602 dwellings under the AHPI scenario.

In terms of housing choices in residential areas, the AHPI significantly expands capacity in the THAB zone by way of extra height and the wider application of the zone along corridors. Compared to PC 78, THAB zone capacity grows from 27% of residential capacity to 48%. MHU type development provides 39% of capacity, down from 69% under PC 78 baseline. See Table 10.

Table 10: Share of residential capacity, AHPI and PC 78

Residential zone	AHPI	PC 78 Baseline
Terrace Housing and Apartment zone	48.1%	27.1%
Mixed Housing Urban	39.3%	68.9%
Mixed Housing Suburban	10.7%	1.7%
Single House zone	1.7%	2.0%
Large Lot / Rural and Coastal	0.3%	0.3%

Of the housing options in THAB zones, 15 storey areas contribute 6% of total housing capacity, with up to 6 storey areas contributing 31%.

7.9.2 Risks and uncertainties

Section 32 requires assessment of the risks of acting or not acting. In the case of the AHPI, Council must act and notify a plan change in accordance with the requirements of Schedule 3C of the RMA if it wishes to withdraw PC 78 (which would have incorporated the MDRS into the AUP).

Key risks arising from the preferred approach set out above relate to:

- Over reliance on THAB/Business zones for added capacity
- Insufficient capacity added to central Isthmus (inner ring)
- Misalignment with infrastructure capacity.

These risks are discussed in the following table.

Risk / Uncertainty	Comment
Over reliance on THAB/Business zones for added capacity	To compensate for the removal of the suburban housing capacity generated by the MDRS, the AHPI plan change considerably expands housing capacity offered by apartment type developments (such as in THAB and Business Mixed Use zones). The capacity provided may significantly exceed actual demand, with resulting limited/patchy take up of these development options. This may result in greater demand for greenfields and/or suburban development options compared to that proposed in the plan change. This risk is managed by a number of actions: The large 'gap' between expected overall demand (around 350,000 dwellings) over the next 30 years, and plan enabled capacity of over 2 million dwellings. This gap means that there should be ample choices for households to select housing options that meet their needs without having to significantly adjust zoning patterns, even if demand for some options is understated. Over the next 20 to 30 year, demographics and economics suggest growing demand for apartment living. Ensuring good urban design of development within walkable catchments and along corridors through appropriate standards and assessment criteria.

Risk / Uncertainty	Comment
Insufficient housing capacity added to central Isthmus (inner ring)	Standard urban economics generally predicts the greatest density of housing will be in inner ring suburbs, but in Auckland's case, the inner isthmus contains a variety of qualifying matters that reduce capacity. This may see some housing growth 'displaced' to middle and outer ring suburbs, pushing up overall land and house prices in these areas. The AHPI does see additional housing capacity close to the central area, compared to PC 78. While the added capacity is modest, capacity is well in excess of estimated demand. This risk is also managed by the AHPI continuing to support and reinforce the development of a network of Metropolitan and Town Centres (which support a multi-nodal pattern of growth with sub regional access to jobs and activities and a lesser reliance on the central area).
Misalignment with infrastructure capacity	The AHPI maintains the AUP's encouragement of housing growth around centres and along transport routes, helping to address pressures on transport networks from intensive development. Nevertheless, on-going growth in the suburbs will exacerbate some existing traffic congestion and other transport related issues. The AHPI plan change proposes a stronger role for corridors based on the frequent transit network to help address this. With regard to water and wastewater infrastructure, any mix of urban form options will raise a similar range of issues as to infrastructure capacity. Maintaining a focus on infill and redevelopment rather than urban expansion helps to manage cost pressures associated with extending networks into greenfields areas. Within the existing urban area, greater density helps to spread upgrade costs over a larger base, but programming upgrades can be complex due to the wide range of development options enabled. As sequencing of development in the areas where the AHPI proposes increased capacity is unable to be predicted it is possible that water and wastewater infrastructure capacity in some areas will remain constrained. This may mean that some development that is otherwise enabled, is unable to connect to water supply or wastewater networks until capacity is available. Watercare are managing this risk by retaining a QM for the combined stormwater and wastewater network and seeking to have appropriate objectives and policies in residential zones and chapter E38 (urban subdivision) to ensure consideration of effects of development on its infrastructure capacity. Watercare are also enhancing

Risk / Uncertainty	Comment
	information on where capacity constraints exist and encouraging early dialogue with developers. This should help to address redevelopment pressures in areas of known capacity constraints.

8 Conclusion

Section 32 requires an assessment of whether the proposed objectives of the AHPI are the most appropriate way to achieve the purpose of the RMA, and whether the proposed provisions are effective and efficient means of achieving the objectives, having considered options and their costs and benefits and the risks of acting or not acting.

In the context of policies 3 and 4 of the NPS-UD and recent RMA amendments (including new Schedule 3C), which set out specific intensification objectives and additional assessment requirements where qualifying matters are proposed, the above evaluation has concentrated on the efficiency and effectiveness of the proposed methods. The analysis concludes that the proposed plan change provides an appropriate means to provide the same housing capacity as PC 78, while enabling an urban form that is consistent with the quality compact, well-functioning urban environment outcome advanced by the AUP.

The AHPI retains protections of key qualities and natural resources that add to Auckland's liveability and better manages the adverse impacts from natural hazards on people and property. At the same time housing capacity is expanded compared to the AUP (to a level equivalent to that of PC 78), and a wider range of housing options are proposed to assist with a more responsive housing market.

Retention of qualifying matters such as Special Character areas and Maunga viewshafts, plus the inclusion of new provisions in the AHPI to better manage significant risks from natural hazards do impact upon housing capacity, particularly in the inner Isthmus. The impact of this reduction on economic and social outcomes is moderated by the substantial local and region-wide housing capacity still provided by the plan change – which is well above expected demand - as well as the contribution that such QMs make to the liveability and character of the region.