



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

to the Auckland Unitary Plan (Operative in part)

SECTION 32 THE RESOURCE MANAGEMENT ACT 1991

ECONOMY MATTERS

EVALUATION REPORT

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Executive Summary

1.1 Overview

This is the Section 32 evaluation (**s32**) of Proposed Plan Change 120 – Housing Intensification and Resilience (**PC120**) to the Auckland Unitary Plan Operative in part (**AUP**) - the Auckland housing planning instrument or **AHPI** as defined in clause 1 of Schedule 3C of the Resource Management Act 1991 (**RMA**).

PC120 will enable very substantial housing capacity throughout Auckland, in residential and business zones, to meet the requirements of clause 4(1)(a) of Schedule 3C of the RMA, including to provide at least the same amount of housing capacity as would have been enabled if Proposed Plan Change 78 – Intensification (**PC78**) (as notified, now withdrawn in part) were made operative.

PC120 will introduce zoning changes and modified provisions to enable substantial intensification including greater heights and new Height-In-Relation-to-Boundary (**HIRB**) rules across many areas of urban Auckland, particularly in residential areas around Auckland’s city centre or Central Business District (**CBD**).

That amount of ‘housing capacity’ is not specified in the legislation in terms of numbers of dwellings. It is incumbent on Auckland Council (**Council**) to both estimate the housing capacity that would have been enabled under PC78 and to also ensure that PC120 at least equals that amount of housing capacity. Council’s assessment is that PC78 would have enabled 2,073,946 additional dwellings.

A critical matter is that applying Medium Density Residential Standards (**MDRS**) through PC78 would have resulted in an amount of plan-enabled capacity for housing in Auckland which is substantially greater than the expected scale of housing demand in the very long term. That is because the level of capacity enabled under PC78 was based on the statutory requirement to apply the MDRS provisions across a very large number of residential zoned sites. There was no reference to the level of demand for housing.

Council’s estimate of the plan-enabled capacity under PC120 is for 2,069,708 additional dwellings. This means that:

1. the level of housing capacity enabled under PC120 is very substantial, though 4,238 (0.2%) short of what would be enabled under PC78; and
2. PC120 would provide for an amount of plan-enabled housing capacity which is many times larger than the anticipated level of demand for additional housing in Auckland in the long term (2023-53) and in the very long term (2023-2175)¹.

The large difference between anticipated demand and plan-enabled capacity has important implications for the Auckland housing market and the urban economy more widely, and for this assessment.

1.2 s32 Scope

This s32 assessment addresses the impacts and implications of the level of enablement in PC120.

This is in relation to Policy 3 of the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the objectives of the NPS-UD, to Auckland as a well-functioning urban environment (**WFUE**) and to the benefits of

¹ the NPSUD does not define what constitutes a longer planning horizon than the 30-year long term. On the basis that the amount of plan-enabled capacity is around 6 times the demand anticipated in the long term, the 150+ years of enabled capacity would represent as a minimum the “very, very long term”.

urban development. That Policy 3 assessment applies to most of the area affected directly by PC120, and the balance of the economy.

However, the legislation identifies two paths for assessment. For locations which are affected by Qualifying Matters (QMs), there is a 2-step process, to first identify the effects of any QMs on the development capacity enabled (broadly equating with the numbers of dwellings), relative to the numbers which would be enabled without QMs. That is required by Clause 8 of Schedule 3C. The second step is to then assess the effects of the dwellings which are enabled with QMs in place. This is through a Policy 3 assessment.

The Policy 3 assessment applies to all locations where there are no QMs, as well as to locations potentially affected by QMs. This means the effects of PC120 are examined primarily through a Policy 3 assessment, with the focus on the housing capacity and level of development enabled, as distinct from the level of development not enabled.

While the emphasis of Clause 8 of Schedule 3C is on the difference in the level of development enabled, the RMA does not specify criteria by which any difference in dwelling numbers should be evaluated. The assessment through Clause 8 (2)(b) is on the impact of “*the provision of development capacity*” which focuses on the amount of capacity. The effects of this lesser amount of capacity are to be assessed in terms of “*..the costs and broader impacts of imposing those limits*” which implies a focus on numbers of dwellings. The costs and broader impacts require a more holistic assessment than just dwelling numbers.

This s32 assessment of proposed PC120 is significantly broader than consideration of just the amount of housing capacity and level of development enabled. That is because housing enablement *per se* directly affects the entire Auckland economy and the WFUE. PC120 affects (directly and indirectly) the numbers and types of dwellings able to be developed in every location. That enablement will have effects and impacts according to what is able to be developed, affecting market perceptions and expectations of development opportunity, and more especially from the nature and timing of housing development put in place when there is feasible opportunity to do so. That development will have consequences for housing capacity, and urban growth and form outcomes for Auckland, for both residential capacity and business capacity. The development pattern and growth outcomes will directly influence the efficiency and performance of the urban economy, and affect outcomes for the community, especially but not only in relation to housing needs.

The assessment of the impacts of QMs which may limit the development capacity enabled also needs to be broader than a simple count of the gross dwelling numbers which are potentially affected by QMs. Where and especially when QMs might affect the level of development is important, given that any effects of QMs would arise predominantly at the time when they might affect the housing development which is occurring or is likely to occur. The timing of potential effects is a key consideration, because the level of enablement in PC120 is very large, and most of the capacity which is plan-enabled is not likely to translate to actual housing development until many years into the future.

Total plan-enabled capacity is around 6 times the level of demand for additional dwellings expected over the next 30 years, so that within the NPS-UD long term time frame (2023-53) around only 15-17% of the total plan-enabled capacity is likely to be taken up by the market. As a consequence, only around 15-17% of the potential gross effects of QMs would be material in the long term.

Moreover, under PC120 there would be substantial development opportunity enabled in every local market in Auckland. This means there will be significant opportunity for any limits imposed by QMs on capacity to be directly offset by development occurring instead on other sites in the same market and price bands.

1.3 Plan-enabled Capacity and Housing Demand

The scale of plan-enabled capacity relative to demand for additional dwellings is a key consideration.

The housing capacity for 2,069,708 dwellings enabled by PC120 is very large. It would provide sufficient capacity to provide for future demand for housing out to around the year 2175 to 2225. Over the next 30 years, Auckland's housing market is expected to see demand for another 360,000 dwellings (estimated according to the StatsNZ latest population projections (September 2025). StatsNZ is not due to release its household projections corresponding to the population projections until mid-2026²).

That level of development enabled is comprehensive. There is substantial capacity enabled across multiple locations throughout urban Auckland. It will allow for a full range of dwelling types and sizes, across multiple price bands. PC120 does not extend to the city centre zone or to areas included as Future Urban zone, and potential capacity in those locations is additional to what is enabled in PC120.

The 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, because there will be substantial capacity available on other sites in the same market and the same value bands as sites affected by QMs. In every local housing market area within Auckland – using the SA2 statistical areas defined by StatsNZ³ to represent 628 local markets within Auckland – there is substantial plan-enabled capacity both on sites unaffected by a QM, and on sites affected by a QM.

A small part of the impact of QMs will arise from the limits on housing capacity on paper, expressed in terms of what is identified as enabled in the Plan. That stated or identified capacity will influence market expectations and planning. However, there are many years' of capacity enabled. That means a large proportion of the enabled capacity is too far away in time for its development opportunity to have much influence on market actions or expectations. Most of the effects of QMs will arise from the level of development which occurs, or can be expected to occur in the short-to-medium term. As a consequence, the large amount of plan-enabled capacity throughout the market means the direct impacts of QMs are expected to be very small.

Only a small share of the maximum potential impacts of QMs would arise in the next 30 years (NPS-UD long term 2023-53) and for impacts potentially arising from limits on development capacity, there is extensive opportunity to develop on other sites instead in the same markets. That substantial opportunity would act to offset the impacts of QMs limiting development. This means the materiality of impacts from QMs is very small, because of the large scale of enablement.

This also means that many of the effects of QMs on limiting development capacity, (whether as potential effects on paper or on actual development opportunity when demand arises), will not accrue until well into the future. These long time frames mean the impacts are further diminished in present value (PV) terms.

1.4 Assessing Effects

Council's capacity modelling identifies plan-enabled capacity at a site level throughout Residential zoned areas, as well as for capacity on Business zoned sites. This s32 assessment has examined the capacity enabled by type

² StatsNZ does not release population projections beyond 30 years at the subnational level.

³ SA2s are Statistical Areas as part of the Statistical Standard for Geographic Areas defined by Stats NZ as "an output geography that provides higher aggregations of population data than can be provided at the statistical area 1 (SA1) level. The SA2 geography aims to reflect communities that interact together socially and economically. <https://datafinder.stats.govt.nz/layer/106728-statistical-area-2-2022-generalised/>

(allowing for zoning and height provisions) and by location. In addition to the overall economy-wide picture, this offers focus on the key locations and areas of significance in the economy and within the WFUE, including places where other provisions of the AUP have effect.

The assessment covers the elements of clause 4(1)(b), (c) and (d) of Schedule 3C of the RMA. It includes locations of interest such as the inner city suburbs close to the CBD⁴, and areas where QM provisions are in place, whether not as defined QMs in walkable catchments (**WCs**) of the areas referred to in clause 4(1)(b) and (c) of Schedule 3C of the RMA and walkable catchments of the areas referred to in policy 3(c) (**WC areas**) and Policy 3(d) areas within and around town and local centres. Outside the WC and Policy 3(d) areas, many sites are identified according to their QM-related aspects - including Special Character, Maunga Viewshafts, height and Height Sensitive Areas, and coastal areas, and overlays – even though they are not QMs. These locations are assessed in relation to Policy 3 and the objectives of the NPS-UD.

1.5 Effects of Qualifying Matters

There is considerable interest in how QM provisions might impact on the levels of development enabled under PC120, especially on areas of the Auckland isthmus and places which are generally closer to the central city.

One focus of the assessment is the levels of plan-enabled capacity in locations with a high incidence of QMs and QM-related aspects. This is important to indicate whether or not QMs would have tangible effects on the level of development enabled under PC120. The modelling has not examined or compared outcomes without and with specific QMs in place.

The QM-related provisions only become a Qualifying Matter if they occur on a site in a WC area and/or a Policy 3(d) area around centres and transport nodes. Otherwise, those same provisions may apply to sites in other locations, but are not assessed as a QM.

Council's modelling identifies the incidence of 22 QMs in a range of locations under PC120. These QMs have been examined individually and in combination, to understand the potential direct effects on the level of development enabled, and wider consequent effects from limiting the level of housing capacity.

Council's capacity modelling for PC120 and the PC78 Baseline allowed for all of the QM-related provisions to be in place. The modelling does not identify what the plan-enabled capacity would be if there were no QMs in place, to compare with all QMs being in place. This means that examination of the effects of any specific QMs is on the basis that all other QMs were also in place. The modelling does not identify the effects of any specific QM by itself.

The impacts of QMs are to be assessed under Clause 8 of Schedule 3C as to whether Council considers the QM "*incompatible*" with the level of development under 4(1)(b) or (c) or Policy 3, with reference to the specific characteristic(s) which make that level of development "*inappropriate*". For existing QMs, Council must identify the location, why the QM applies in that location, specify the alternative heights and densities, give a comparison in general terms, and notify the QM in the AHPI.

The Clause 8 assessment is based on the level of development for housing, and what the costs and broader impacts of allowing a lesser level of development would be, in relation to the significance of urban development and the objectives of the NPS-UD. Matters other than the level of development are referenced indirectly.

⁴ The CBD or central business district is the largest single centre in the Auckland economy, and is defined geographically as the area zoned as City Centre in the AUP OIP.

The substantial difference between plan-enabled capacity and housing demand is very material to this. Because there is a very large amount of plan-enabled capacity relative to demand, QM effects on limiting the level of development will in most instances be minimal.

As a consequence, the costs and broader impacts of imposing limits on capacity through QMs are very small, under clause 8(2)(c). The limits on capacity will be easily offset by the abundant capacity on other sites in the same locality and market. Because of this, the QMs would generate minimal effects in terms of any reduction in the provision of development capacity (clause 8(2)(b)). There is abundant plan-enabled capacity in all locations to offset the effects of QMs on development capacity.

As a consequence, the benefits which are sought from applying QMs can be achieved with minimal cost for the benefits of urban development or the objectives of the NPS-UD. Because their main cost or negative effect would be on the level of development enabled, the abundant plan-enablement will act to offset that, such that the benefits of QMs can be expected to substantially outweigh their costs. The potential benefit from that housing capacity can be realised because there is opportunity for the same levels of housing to arise from alternate sites in the same area and market without impacting the sites with QMs.

Accordingly, the QMs can be expected to deliver positive net benefit for the Auckland economy and community, relative to their “costs” in terms of limiting development capacity. This is especially in Present Value (PV) terms because most of the costs from limited capacity would not be incurred until many years into the future. These conclusions apply generally to the QMs examined, including Special Character, Maunga Viewshafts, Height, height sensitive areas and coastal areas, with the substantial plan-enabled capacity acting to offset potential effects generally across Auckland.

1.6 Main Findings

The main findings from the s32 assessment include:

1. PC120 can be expected to deliver substantial benefit to Auckland generally, by enabling housing capacity in broadly efficient locations and by providing substantial opportunity for housing development to meet the preferences of the Auckland community.
2. The enablement of housing capacity will generally support business growth, and growth in the economy at large, by providing for additional population in locations which will support business activity through household demand, and accessibility to the labour force, both of which relate directly to the distribution of population.
3. The expected urban form outcomes are to some degree different from those expected under PC78. There is greater potential for housing development to occur in Auckland’s more central areas, including across the central isthmus, and in locations in and around centres (including Walkable Catchments) and which are close to stations and transport corridors. That pattern may be seen as enabling a more efficient urban form than would have been the case under PC78, where the MDRS provisions would have resulted in enablement of housing in a more dispersed and generally less efficient pattern.
4. However, the housing capacity enabled under PC120 is considerably greater than the long term level of demand, in the same way as it would have been under PC78. That provides scope for new housing development to occur in many locations, throughout Auckland. New housing development is influenced by a number of factors, including available capacity, demography, consumer preferences for dwelling types and sizes, preferences for locations and the urban living environment, and households’ ability to

pay. The commercial development sector seeks generally to operate profitably by satisfying consumer demand for new housing at prices which purchasers can afford. That sees new development occurring in a wide variety of locations, including where new housing is at prices lower than those in more central areas or in suburbs with the highest property and land costs. The pattern of new housing development in Auckland and most other markets, shows a mix of dwelling typologies, sizes and prices, and differing market positions to cater for the combination of demand from many market segments, with new housing in locations with low, medium and high mean land and property values.

5. The pattern of housing enablement can be expected to support Auckland's established form and function as a multi-nodal city, with its strong CBD complemented by the network of metropolitan, town and local centres. The city exhibits a characteristic 'central place' development structure and urban form, with the CBD as the largest single centre but accounting for a progressively smaller share of growth in economic activity over time as increasing city size means other locations are more efficient for many commercial and public sector activities. These dynamics mean that the CBD will continue to grow and intensify, remaining as the largest centre even as its share of the regional total reduces, and as a strong focus for residential development in adjacent and surrounding residential areas. PC120's enabled capacity can be expected to support intensification in those residential areas and in the CBD itself.
6. The housing capacity and residential intensification enabled in the Walkable Catchments is expected to support Auckland's network of commercial centres including the CBD, and deliver a relatively efficient pattern of housing including through the focus on more central areas of the city. Similarly, the residential development and intensification enabled in the Policy 3(c) and 3(d) areas is expected to support Auckland's network of commercial centres at all levels of the centres hierarchy, and help deliver a relatively efficient pattern of housing.
7. The s32 assessment shows that QMs can be expected to have very little impact on the levels of development, and the realisation of benefits from PC120's enablement of capacity. That is because the substantial amount of capacity will act to largely offset potential effects of QMs on enablement, into the very long term.
8. The wider assessment of places not subject to QMs relates to Policy 3 and NPS-UD objectives. That framework applies to 63% of enabled capacity in Residential zones, and 19% of capacity in Business zones, or 51% of plan-enabled capacity in total. Moreover, because the assessment shows that QMs are unlikely to have material effects, then almost all of the sites initially subject to Clause 8 will in the final assessment be examined in terms of Policy 3 and NPS-UD objectives.

1.7 Caveats

9. These findings are based on modelling of total and plan-enabled capacity undertaken in October 2025. The development of PC120 has been focused on achieving enough plan-enabled housing capacity to satisfy Schedule 3C clause 4(1)(a), and match the PC78 (as notified) housing capacity as the predominant consideration. That capacity has been found through a combination of re-zoning, changes to height limits and HIRB, site coverage and other development provisions.
10. The focus on providing enough enabled capacity has afforded limited time for detailed assessment of the potential effects which may arise from intensification of the living environment. – such as developing to greater heights and allowing potentially less space between buildings' – to examine potential dis-benefits as well as benefits of enabling more development capacity. Such assessment is important – for example,

an assessment of the environmental and social costs associated with increasing built density was a key part of the cost and benefit analysis for the MDRS provisions when identified in 2022.

11. The scale, timing and location of adding plan-enabled capacity are key matters. The timing of implementing new provisions to enable more intensification, relative to when that additional capacity may be taken up, is important if potential dis-benefits from enabling the intensification arise before the benefits from greater growth and density are realised. Similarly, there has been limited consideration of wider implications, including the effects of enabling substantially higher population densities in and around central Auckland, and how those densities may affect the functioning of the CBD and inner city suburbs in terms of people interactions and movement and travel.
12. Such matters are expected to be part of the wider assessment of PC120 in the future.

2 S32 Assessment

2.1 Objective

The purpose of this Report is to provide an economic evaluation of the proposed Auckland housing planning instrument (PC120) in accordance with section 32 and Schedule 3C of the RMA, and the objectives of the NPS-UD.

Section 32 of the RMA requires that before adopting any objective, policy, rule or other method, the Council shall carry out an evaluation to examine:

- The extent to which each objective is the most appropriate way to achieve the purpose of the RMA, and
- Whether, having regard to their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objective.

The evaluation must also take into account:

- The benefits and costs of policies, rules, or other methods; and
- The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.

2.1.1 Context

PC120 is required if the Council withdraws all or part of PC78 under clause 3 of Schedule 3C of the RMA. PC78 was required to comply with sections 77G and 80E of the RMA, which includes a requirement to incorporate the medium density residential standards (MDRS) into relevant residential zones and to give effect to Policy 3 and 4 of the National Policy Statement on Urban Development 2020 (NPS-UD⁵). In contrast, PC120 is not required to comply with section 80E of the RMA, and must instead comply with clause 4 of Schedule 3C and may include provisions of the kind permitted under clause 5(2) of Schedule 3C of the RMA.

PC120 is required to give effect to the NPS-UD and the Regional Policy Statement (**RPS**) by implementing their objectives and policies. Objective 1 of the NPS-UD states *'New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety, now and into the future.'* All the other objectives and policy directions in the NPS-UD cascade from this concept. The core premise is that changes to the urban environment should:

- improve housing affordability;
- support competitive land and development markets;
- respect qualifying matters;
- respond to the diverse and changing needs of people and communities;
- enable housing choice that meets the needs of different households; and
- enable urban intensification in areas well served by existing or planned public transport.

⁵ As updated May 2022.

The concept of ‘well-functioning urban environment’ (WFUE) should be applied and understood at a refined geographic level having regard to how the city functions, the operation of the land and housing markets, and the implications for people and communities.

The RPS in the AUP was amended through Plan Change 80 : RPS Well-functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters (PC80, now operative) to expand on the concept and apply it to the following chapters: urban growth and form, natural resources, the coastal environment, qualifying matters, and environmental risk. RPS Objective 2.2.1 provides:

(1A) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety, now and into the future.

(1) A well-functioning urban environment with a quality compact urban form that enables all of the following:

(a) A higher-quality urban environment;

(b) Greater productivity and economic growth;

(c) Better use of existing infrastructure and efficient provision of new infrastructure;

(d) Good accessibility for all people, including by improved and more efficient public or active transport;

(e) Greater social and cultural vitality;

(f) Better maintenance of rural character and rural productivity;

(g) Reduced adverse environmental effects; and

(h) Improved resilience to the effects of climate change...”

2.1.2 Scope of this Report

This Report provides the economic assessment of PC120. It adheres to the s32 framework required by the RMA to consider the benefits and the costs of a proposal.

PC120 will apply to almost all of urban Auckland, and will have far-reaching implications for the Auckland economy and community.

Housing development is a critical component of the Auckland urban economy and WFUE, and the patterns of development enabled and arising will directly and indirectly affect fundamental aspects of the Auckland urban economy and community, into the long term.

A detailed and thorough assessment is required, and this s32 Report presents a wide-ranging evaluation of the overall effects of the changes contained in PC120. These changes include those which enable additional levels of development for housing, and those that limit or qualify additional levels of development, compared to the baseline⁶ of providing the same amount of housing capacity that would have been enabled if PC78 (as notified) were made operative.

It is intended to be read alongside the s32 Overview Evaluation Report.

⁶ This is referred to as the Baseline scenario for the capacity modelling

2.1.3 Baseline for Assessing PC120

A comprehensive s32 of the economic effects and implications of PC78 was prepared in August 2022. Like PC120, PC78 was intended to enable substantial intensification of urban Auckland, through provisions to allow for increased housing intensity and more development height in residential zoned areas and in business areas - Policy 3 relates to City Centre zone, Metropolitan Centre zone, walkable catchments and intensification in and around town and local centres.

Also like PC78, PC120 will enable greater capacity for housing than the operative AUP, through changed plan provisions.

There are important differences from proposed PC78, including the spatial patterns of enablement, and this s32 assessment is not an edited version of that for PC78. That said, to a considerable degree, the issues and the nature of effects which would have arisen from PC78 can also be expected to arise from PC120. This is especially because of the commonality in the underlying economic processes in the urban economy. The effects on local areas, and the wider market, will arise from the greater opportunity to develop sites, enable housing and enable more intensive development.

PC78 would have plan-enabled a very large amount of development capacity for housing, considerably greater than the expected level of demand for additional housing in Auckland, and that difference *per se* would have been an important driver of effects. The s32 assessment of PC78 concluded that it would deliver a range of benefits compared with the AUP, would contribute positively to the WFUE and to the wider benefits of urban development. These same broad criteria also set the assessment benchmark for PC120.

There is an overall requirement that PC120 must provide at least the same amount of housing capacity that would have been enabled if PC78 (as notified) was made operative. However, it is not a question of comparing the PC120 outcome with what was reported for PC78 in 2022. The equivalent enablement to PC78 applied for this high-level comparison is not the same as that estimated for PC78 as notified. Instead, a new Baseline has been estimated to reflect what would have been the case if PC78 were applied to the Auckland market of 2024, with an updated land base and cadastral structure, allowance for changes in zoned areas post 2022, and taking account of the modified enablement post 2022 especially in relation to managing flooding risk.

This assessment is able to focus on the outcomes of PC120, in relation to the WFUE and the benefits of urban development *per se*, and also as compared with the Baseline (PC78) because PC120 will not include the MDRS. Both the Baseline and PC120 modelling include QMs.

Key areas of assessment are the overall plan-enabled dwelling capacity, the nature of that enabled capacity, and the location of capacity in the context of the WFUE and the objectives of the NPS-UD including the benefits of urban development.

PC120 is assessed here as a complete package which applies the Policy 3 provisions, and also incorporates QMs. The PC120 capacities take into account changes in zoning, including greater heights in many locations, and increasing the extent of “high demand” areas around town and other centres (relating to Policy 3(d)) and along some Frequent Transport Network (FTN) corridors.

Although there is basic similarity in the nature of effects, and in the likely outcomes for many locations, the differences are substantial enough that a marginal assessment to cover the differences from PC78 will not be adequate for this s32 Report. PC120, like PC78, represents a substantial change from the operative AUP, and it is important to evaluate PC120 on that basis, especially because of differences in the location of plan-enabled

capacity, and the consequent differences in the likely urban growth outcomes, which will directly affect Auckland's WFUE and the benefits of urban development.

The core requirement is to examine the impacts of housing enablement *per se* across Auckland, including for the WFUE, and the benefits of urban development. This is to address the big picture outcomes of where housing capacity is enabled, where and when the enabled growth can be expected to occur, and to understand the implications for urban development.

The broad conclusion is that PC120 will provide for plenty of housing capacity, and generate a number of "costs and broader impacts" for the WFUE and the benefits of urban development.

The residential development capacity enabled will have significant direct effects on the scale and patterns of housing development into the very long term, and will have direct and flow on effects on all other parts of the economy. A particular effect will be on the scale, nature and location of business activity serving the population, and drawing from it their workforce needs.

2.2 Approach

The approach and methodology are driven by the requirements of the RMA and the NPS-UD.

A key matter is that there are two paths for assessment. The RMA sets out that QM-provisions in areas within WCs and where Policy 3(d) applies are deemed to be QMs and subject to assessment under Schedule 3C and Clause 8. Other residential zoned areas are subject to assessment in relation to NPS-UD Policy 3, though not Schedule 3C.

There is an important distinction between QM-provisions and QMs. QM-provisions are provisions in the AUP which would enable a lesser level of development than would occur if Clause 4(1) of Schedule 3C were to apply. These include provisions relating to special character, maunga view shafts and so on. The QM-provisions become QMs *per se* if they apply to a site within a WC or Policy 3(d) area, and they are assessed under Clause 8 of Schedule 3C. However, if those same QM-provisions apply to a site which is outside a WC area or a Policy 3(d) area, they are not subject to assessment under Clause 8.

There are two paths for assessment, as follows:

1. Path 1 - areas subject to QM assessment in terms of Clause 8 of RMA Schedule 3C. These are areas within walkable catchments (WCs) (under Policy 3(c) of the NPS-UD or clause 4(1)(b) or (c) of Schedule 3C) and Policy 3(d). In these locations, the primary focus is on any difference in the level of development enabled, which must be assessed in terms of Clause 8 (2) to (4), or (5). Those effects are to be assessed in terms of the "*costs and broader impacts of imposing those limits*" (on development capacity). These provisions apply to 24.7% of the total net additional capacity enabled on residential land under PC120. That is, just under one-quarter of the additional capacity for housing is subject to Clause 8;
2. Path 2 - other areas which are not subject to Schedule 3C Clause 8 because they are outside WC or Policy 3(d) locations. In these locations, the focus is on the level of development enabled under PC120 as proposed, with assessment in relation to the NPS-UD, including all WFUE matters relating to the NPS-UD objectives and RPS Objective 2.2.1. Of the total net additional capacity enabled under PC120, 47.9% is on these residential zoned sites subject to Policy 3 assessment (a further 27.4% of plan-enabled capacity is in Business zones).

However, in the final analysis all areas must be assessed within the Policy 3 framework, and with regard to the objectives of the NPS-UD and the benefits of urban development. That applies to sites initially assessed as QMs.

The reason is that for sites affected by QMs and subject to assessment under Clause 8 there is in effect a 2-step evaluation – first to examine the effects of limiting development, and second to examine the effects that such limits on development are expected to have. The first step requires analysis of the effects of limiting development capacity. However, once that is done the second step is to examine the effects of enabling that remaining capacity. That implies a comparison of differences between development capacity with QMs, and capacity without QMs, which would arise from any differences in the level of development enabled.

For all sites, whether or not subject to assessment under Clause 8, the focus is on the levels of housing development which may be expected from implementing PC120, and the effects of that development. That is in terms of Policy 3 and implications for the WFUE, with regard to the objectives of the NPS-UD, and the benefits of urban development. For areas where there is not a requirement to examine and contrast the effects arising without and with QMs, it is in effect a one-step assessment, to consider the likely effects arising from the scale and nature of housing development in the next 30 years (the NPS-UD long term).

Beyond that initially different path for the WC and Policy 3(d) locations, for both routes the assessment is sheeted to the effects in relation to the WFUE, and the wider objectives of the NPS-UD, in the context of the benefits of urban development.

Those benefits are more broad-ranging than the effects of housing capacity *per se*, and relate to all aspects of the housing development which is enabled, and which is likely to arise from that enablement. Although the focus under clause 4(1)(a) is the development capacity enabled, other provisions mandate urban form outcomes – notably building heights – and the requirement to enable a total amount of housing capacity within Auckland brings into play aggregate and cumulative effects across residential zoned areas, including specified locations such as the WC and Policy 3(d) areas.

The NPS-UD Policy 3 provisions mandate enabling development to a height of at least 6 storeys in ‘walkable catchments’ from the edge of the City Centre zone, the edge of the Metropolitan centre zones, and from existing and planned rapid transit stops across Auckland, as well as in areas adjacent to other high demand centres. Clause 4(1)(b) and (c) of Schedule 3C of the RMA also require the Council to enable building heights of at least 15 storeys within at least a walkable catchment of the Maungawhau (Mt Eden), Kingsland and Morningside Stations and at least ten storeys within at least a walkable catchment of the Baldwin Avenue and Mount Albert Stations.

These provisions will affect much of urban Auckland. *A priori*, they would provide for plan-enabled housing capacity which is several times greater than Auckland’s projected housing demand, into the long term. They will directly affect the development potential and growth patterns throughout the city.

The broad range of direct and indirect effects of enabling capacity highlights the importance of a wide-ranging assessment, to satisfy the requirements of the NPS-UD in terms of the WFUE, and the benefits of urban development.

The RMA requires that proposed plan changes are evaluated under s32 of the RMA. The established approach in s32 evaluation is to consider the proposed plan change, including any variations, in comparison with the appropriate counter factual(s). Section 32 requires assessment of the benefits (positive effects) and the costs (negative effects).

Importantly, although the specifics of Schedule 3C are structured around the effects of limiting the level of development enabled, the direct and indirect effects relate to quite standard and established approaches to assessment of the implications of alternate patterns of urban development and urban form outcomes. Beyond the direct consideration of any effects of limiting development, the focus is on the outcomes for Auckland.

Accordingly, this s32 assessment is to consider the benefits and the costs of PC120, arising from the additional plan-enabled capacity for housing. The analysis includes the effects of QMs, showing the likely benefits and the costs from the Policy 3 and Schedule 3C provisions with the proposed QMs in place.

The starting point is the levels of housing development enabled in PC120. The implications of the Policy 3 (and Schedule 3C) provisions are not limited to their direct effects in housing enablement. The indirect and flow-on effects are critical, because the additional capacity and intensification will affect most aspects of the urban community and economy. There are three main considerations:

- a. The level of housing development enabled.
- b. the direct and wider effects for the housing market, including the delivery of housing supply, and consequences for housing values and the property market, and housing costs and affordability. These effects relate more broadly to the outcomes for the Auckland urban living environment, because the higher enabled housing densities and the different distribution of capacity will have a mix of outcomes, as both benefits for and costs to households and the community.
- c. The direct and wider effects of the housing enablement on the Auckland spatial economy, especially the broader urban growth and development outcomes. These have implications for Auckland's urban form and efficiency, including energy and resource use in travel and interactions, and urban infrastructure. These matters have flow on implications for matters of sustainability and consequences for climate change.

These effects will arise as a consequence of the additional housing capacity which would be enabled by PC120 and Policy 3 and Schedule 3C provisions. They will be directly influenced as well by any QMs which affect the level of development enabled in any location.

Importantly, not all effects will arise at once. Some effects will arise once the new provisions are implemented, including on initial perceptions of the housing market and development opportunity. However, many other effects will arise in the future, especially as ongoing growth in demand for housing sees the outcomes of the provisions manifest 'on the ground'.

2.2.1 Capacity Terms

There are several terms in Schedule 3C of the RMA which differ slightly, though all relate to the concepts of housing capacity and development:

- a. Clause 4(1)(a) refers to "*housing capacity*". This is the only reference to the term: "*housing capacity, in relation to the Auckland Unitary Plan or Christchurch district plan, means the housing that the plan enables as a permitted activity, controlled activity, or restricted discretionary activity.*" For the purposes of this s32 assessment, "housing capacity" has been interpreted here as the number of dwellings enabled, drawing on the relevant definition.
- b. However, Clause 4(1)(b)(i)(B) and 4(1)(c)(i)(B) refer more obliquely to capacity in terms of heights and densities commensurate with "*the amount of housing and business use that is appropriate*".

- c. Schedule 3C Clause 8(2)(a)(ii) interprets the terms in Clause 4(1)(b) and (c) as referring to a *“level of development”*.
- d. Subsequently, Clause 8(2)(b) refers to limiting *“development capacity”*. However, that appears to be only part of the development enabled because the full reference in Clause 8(2)(b) is to *“limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity.”*

The terminology is important, because key parts of this s32 are to address Clause 8(2)(b) to *“assess the impact”* of both *“limiting development capacity”* and *“the provision of development capacity”* as well as to *“assess the costs and broader impacts”* of *“imposing those limits”*.

All of those terms relate in some way to ‘housing capacity’ but there is not clarity about whether the other terms may also be expressed as the number of dwellings, in the same manner as the *“housing capacity”* term has been applied here in regard to the Council’s capacity modelling for the Baseline and PC120.

For this assessment:

- a. Clause 4(1)(a) of Schedule 3C is taken as a basic reference point which specifies that PC120 is to provide at least the same amount of housing capacity (number of dwellings) that would have been enabled if PC78 (as notified) were made operative;
- b. the term ‘development capacity’ is taken to also represent numbers of dwellings and on this basis be consistent with housing capacity.

Although that comparability is not confirmed within the RMA terminology, it is important to be able to compare numbers of dwellings on a like for like basis. Otherwise it is not possible to assess or compare different outcomes and effects.

On that basis, the terms level of development and development capacity in Clause 8 have been taken here to be numbers of dwellings, and the capacity modelling expressed as numbers of dwellings is assumed to have the same meaning as a level of development and development capacity.

2.2.2 Qualifying Matters - Schedule 3C and Clause 8 Assessment

For enabled capacity which is subject to a QM, Clause 8 of Schedule 3C specifies a number of evaluation requirements, for the enabling policies *per se*, and for QMs. Key aspects are:

- i. the outcomes to be assessed are to be identified as a *‘level of development’*⁷. Clause 8(1) sets out that a QM may be *“less enabling of development”* than clause 4(1)(b) and (c) including for any other matter *“that makes higher density inappropriate in an area”*, provided the specific characteristics that makes the level of development inappropriate is identified (Subclause (4)).
- ii. Assessment is required where a QM would provide for a different *‘level of development’* from the default provisions⁸.
- iii. outcomes from QM are to be assessed in terms of incompatibility or inappropriateness. The level of development provided by clause 4(1)(b) or (c) of Schedule 3C or policy 3 of the NPS-UD needs to be shown as being *“incompatible”* with a QM listed under s77I(a)-(i).

⁷ Under clause (2)(a)(ii), (4)(a)-(b) and (5)(d) of Schedule 3C of the RMA.

⁸ Under Clause 8(2)(a)(ii) and (4)(a) and (b) of Schedule 3C of the RMA.

- iv. Any level of development, including any lesser level of development enabled under a QM, must be assessed to take account of the costs and broader impacts, including potential benefits.
- v. For other QMs not specifically identified in s771(a)-(i), the Council must establish that a specific characteristic makes the level of development specified by clause 4(1)(b) or (c) of Schedule 3C or policy 3 *'inappropriate'*.
- vi. For other QMs not specifically identified in s771(a)-(i), Council must take account of the national significance of urban development, and the objectives of the NPS-UD.
- vii. For existing QMs (a QM listed under s771(a)-(i) that is operative in the AUP when PC120 is notified) there are lesser requirements, but which still require assessment for a different *'level of development'* from the default provisions.

The framework for assessing plan-enablement and QMs is accordingly wide-ranging, requiring consideration of *"costs and broader impacts"* and examining inappropriateness in relation to urban development *per se*, and the NPS-UD objectives which encompass the core aspects of the urban environment. Clause 8 of Schedule 3C of the RMA requires broad, multi-faceted and long-term evaluation of the effects of the likely *'level of development'*.

To a substantial degree, this mandated broad and long-term assessment fits well with the provisions of s32 of the RMA. That said, there are challenges from the requirements to assess a *'level of development'* and show that level to be *'incompatible'* or *'inappropriate'* within the broad frameworks offered by urban development *per se*, and the objectives of the NPS-UD.

The assessment of QMs is focused on the numbers of dwellings which would be enabled, so as to show the effects of QMs in terms of any differences in or limits to the numbers enabled.

Clause 8(2) of Schedule 3C of the RMA sets out that the evaluation report must *"in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(a) or (b),*

(a) demonstrate why Auckland Council considers—

(i) that the area is subject to a qualifying matter; and

(ii) 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

(b) assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and

(c) assess the costs and broader impacts of imposing those limits.

This requires that the location be identified as appropriate to the QM, and also that the QM is incompatible with the level of development provided by clause 4(1)(b) or (c) or policy 3. In relation to assessing the impacts, this involves an evaluation of the net benefits of the level of development otherwise enabled, and the net benefits of the outcomes sought by the QM which that level of development would affect or eliminate.

Under clause 8(4) of Schedule 3C of the RMA, in relation to a proposed amendment to accommodate an "other matter" QM under subclause (1)(b), an evaluation report must also:

(a) 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

(b) 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

(c) include a site-specific analysis that

(i) 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.

Importantly, beyond the first step to show how a QM might limit the numbers of dwellings enabled, the overarching requirement in relation to Clause 8 of Schedule 3C is to assess impacts relative to Policy 3 and the objectives of the NPS-UD, in the context of the WFUE and benefits of urban development.

These effects arise from the effects of enabling capacity, and any effects of limiting capacity. The wider attention in the legislation is on the consequences of providing for and limiting development capacity, having first examined how QMs may affect the amount of capacity enabled. It is accordingly important to track through those consequences when evaluating the impacts of QMs in relation to Clause 8(2), Clause 8(4), as well as alternatively under Clause 8(5) for existing QMs.

2.2.3 QMs in Walkable Catchments and Policy 3(d) Areas

QMs are provisions which make the level of development less enabling than otherwise provided for by clause 4(1)(b), (c) or Policy 3 which are applied to sites in WC areas and policy 3(d) areas. Where these same Plan provisions are applied to sites which are not in WC areas or Policy 3(d) areas, they are not categorised as QMs, and assessment of their impacts is in terms of the wider provisions of the NPS-UD.

The primary or first-round assessment of effects of QMs relates to the difference or limits to development capacity. However, the second-round effects are then assessed in terms of the wider provisions including Policy 3 and NPS-UD objectives, and more in relation to a standard s32 analysis to consider the benefits and costs. That places the emphasis on the effects of the levels of housing development which are enabled – with a QM in place – once the effects of limiting development (as per Clauses 8(2) and 8(4) and 8(5)) have been addressed.

Both analyses consider the effects in terms of capacity enabled, with focus on differences in capacity enabled, as distinct from the process or mechanism through which that difference arises. For example, if plan-enabled capacity is for 100 additional dwellings without a QM, and for 80 additional dwellings with a QM in place, the appropriate analysis is to examine the effects of enabling 100 more dwellings compared with enabling 80 more dwellings – in relation to Policy 3 and NPS-UD objectives – as distinct from not enabling the other 20 dwellings – or the impact of the QM on the level of development.

Table 2-1 shows the plan-enabled capacity of sites which are subject to QMs.

Table 2-1 : Plan-Enabled Capacity for Sites subject to QM Assessment

QUALIFYING MATTER	Plan-enabled Capacity on Sites subject to QM			Plan-enabled Capacity on All Sites with QM-related Provisions					
	HIRv3 Residential	HIRv3 Business	HIRv3 Total	IIPC Residential	IIPC Business	IIPC Total	IIPC Residential %	IIPC Business %	IIPC Total %
_policy_3d_count	26,674	5,917	32,591	225,459	174,701	400,160	15%	30%	19%
HIR_DRAFT_AirspaceRestrictionDesignations	212,478	13,620	226,098	868,062	338,240	1,206,302	58%	58%	58%
HIR_DRAFT_HistoricHeritageExtentOfPlaceOverlay	4,506	854	5,360	27,081	37,455	64,536	2%	6%	3%
HIR_DRAFT_HistoricHeritagePlaceOverlay	56	4	60	1,012	117	1,129	0%	0%	0%
HIR_DRAFT_LocalPublicViewsOverlay	1	6	7	116	71	187	0%	0%	0%
HIR_DRAFT_NationalGridCorridorOverlay	4,677	660	5,337	31,303	31,658	62,961	2%	5%	3%
HIR_DRAFT_NotableGroupofTrees	350	26	376	3,100	3,898	6,998	0%	1%	0%
HIR_DRAFT_NotableTreesOverlay	1,862	216	2,078	21,198	17,724	38,922	1%	3%	2%
HIR_DRAFT_OutstandingNaturalFeaturesOverlay	2,213	160	2,373	8,009	4,544	12,553	1%	1%	1%
HIR_DRAFT_OutstandingNaturalLandscapeOverlay	1,061	3	1,064	2,652	11	2,663	0%	0%	0%
HIR_DRAFT_SignificantEcologicalAreasOverlay	14,775	290	15,065	35,772	31,228	67,000	2%	5%	3%
HIR_DRAFT_SitesAndPlacesOfSignificanceToManaWhenua	599	78	677	3,029	1,276	4,305	0%	0%	0%
HIR_DRAFT_SpecialCharacterOverlay	16,047	1,325	17,372	14,991	16,765	31,756	1%	3%	2%
HIR_DRAFT_WaitakereRangesHeritageAreaOverlay	5,692	30	5,722	2,201	516	2,717	0%	0%	0%
PC120_HIR_DRAFT_CoastalEnvironment	3,440	236	3,676	15,613	6,648	22,261	1%	1%	1%
PC120_HIR_DRAFT_CohesiveZoningResponse	1,084	29	1,113	3,277	423	3,700	0%	0%	0%
PC120_HIR_DRAFT_CombinedWastewaterNetworkControl	14,574	457	15,031	57,462	8,363	65,825	4%	1%	3%
PC120_HIR_DRAFT_ComprehensiveIntegratedPlanningOu	13,468	356	13,824	49,856	53,244	103,100	3%	9%	5%
PC120_HIR_DRAFT_LakesideSetback	274	3	277	1,753	250	2,003	0%	0%	0%
PC120_HIR_DRAFT_StrategicTransportCorridorZone	3,276	1,412	4,688	35,728	85,792	121,520	2%	15%	6%
In Walkable Catchment (Yes-No)	42,156	8,068	50,224	401,418	392,867	794,285	27%	68%	38%
In Walkable Catchment OR Policy 3(d)	60,890	11,126	72,016	547,664	468,609	1,016,273	37%	81%	49%

2.2.4 NPS-UD Assessment

Sites which are not subject to a QM are assessed in relation to the NPS-UD.

The Policy 3 provisions emphasise the importance of urban form and function outcomes, and capacity outcomes. The requirements that regional policy statements and district plans enable building heights and densities in the City Centre Zone, in the Metropolitan Centre zones, in walkable catchments from the edge of the City Centre zone, the edge of the Metropolitan Centre zones and from existing and rapid transit stops, and within and adjacent to and town, local and neighbourhood centres commensurate with the level of commercial activity and community services are important in supporting and achieving a WFUE.

However, the assessment is not limited to those matters in Policy 3a-d of the NPS-UD. Direct effects by providing for capacity in the city centre and other centres and business areas in a city have wider implications for an urban economy. As a consequence, assessment in relation to Policy 3 has to be one part of the wider suite of NPS-UD objectives, which cast the framework more broadly than urban form and function. The specific urban form and function and capacity provisions of Policy 3 a-d need to be examined in their wider urban context, as well as in and of themselves.

This brings in the wider objectives of the NPS-UD as part of the evaluation framework, and it includes the implications for the WFUE, as well as the benefits of urban development. That wider frame ties back directly to Clause 8 of Schedule 3C, and the requirements of an evaluation report clause 8(2)(c) which must “*assess the costs and broader impacts of imposing those limits*”. Those costs and broader impacts go well beyond the detail of the amount of a limit on development capacity, to consider the “*level of development*” in relation to “*the national significance of urban development and the objectives of the NPS-UD*” (8(4)(b).

This simply means that the effect of a QM must be assessed in those wider terms, and it follows that any assessment of a different level of development needs to be in the same terms. That draws the examination of

PC120 to be in relation to Policy 3, NPS-UD objectives and the WFUE, and the benefits of urban development as an assessment framework. That applies to development capacity not affected by a QM and also to capacity which is affected by a QM once the direct impacts of a lesser level of development are allowed for.

Policy 3 is critical within the NPS-UD because it defines (in combination with other policies) the urban form and function characteristics which the NPS seeks to achieve and support in cities:

- a. a strong central city or CBD
- b. a centres hierarchy which supports the CBD, with a network of metropolitan centres, town centres, local centres and neighbourhood centres at the lowest scale
- c. the multi-nodal city as the most efficient urban form (as distinct from the notion of a 'mono-centric' city)
- d. the urban centres hierarchy supported by well-located areas of industrial and other business activity (a network or hierarchy of business areas)
- e. residential activity in a range of locations to meet the needs of market segments and groups within the community
- f. commercial, industrial and residential activity in an efficient urban pattern and supported by appropriately located recreation and open space.

Policy 3 is important also because more widely it links the provision and location of capacity for economic activity with the efficient functioning of an urban economy, especially in relation to agglomeration benefits, the need for economic activity to be feasible - for example, in a city centre to have "*as much development capacity as possible*" (emphasis added) - and specifies areas for residential intensification in and around centres to support those efficiencies. In particular, it supports the roles of centres throughout the hierarchy as the foci of economic activity and residential development⁹.

A further key aspect of Policy 3 is the attention to the service areas and catchments of centres, where the provision of development capacity is calibrated to both location *per se*, and to the size (geographical extent) of catchments and service areas which they can efficiently serve. This tuning of the networks of centres and business areas to the size of the economy and localised sub-economies is a key aspect of the WFUE, and the benefits of efficient urban spatial economies.

Analysis of the distribution of housing capacity in relation to the network of centres and business areas is an important part of examining PC120 for its contribution to Policy 3.

⁹ 3(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys;

3(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.

3(c) building heights of at least 6 storeys within at least a walkable catchment of the following:

- o (i) existing and planned rapid transit stops
- o (ii) the edge of city centre zones
- o (iii) the edge of metropolitan centre zones;

2.2.5 Assessment Context

The modelling framework underpinning this report is deliberately conservative. It measures plan-enabled capacity, which is the statutory test under Clause 4(1)(a), not market feasibility. All inputs are derived from the same geospatial datasets used in the earlier PC78 assessment, ensuring internal consistency. The assessment recognises that the over-enablement of capacity relative to expected demand does not in itself generate market distortion. It extends choice and flexibility across Auckland's housing markets, consistent with NPS-UD objectives.

Concerns that QMs may materially constrain capacity are not supported by the evidence. The modelling incorporates all QMs simultaneously and demonstrates that even under upper-bound assumptions, any capacity reduction is negligible relative to total supply. In nearly all SA2 markets, there is abundant residual capacity on unaffected sites within identical price bands, meaning that local substitution effects should offset nominal losses. Of course, there are limitations to modelling these effects in aggregate, but such simplifications have been necessary under the time and data constraints. Furthermore, given that much of the plan-enabled capacity will not be realised for many decades, the present-value impact of any constraint is extremely small.

There is no analysis of the potential environmental or amenity costs of intensification. These matters are acknowledged but should be assessed in detail within other specialist reports. The economic evaluation's statutory focus is on efficiency and effectiveness, i.e., whether the proposed provisions achieve the objectives of the RMA and NPS-UD in a cost-effective manner. Within that scope, the report's conclusions remain sound and proportionate: the benefits of PC120, including improved spatial efficiency and alignment with Auckland's multi-nodal urban structure, outweigh any residual costs.

2.3 Potential Benefits and Costs

The legislation seeks to provide a high degree of plan-enablement for housing throughout the urban economy, in order to facilitate housing supply. Potential direct effects include increases in housing supply and in housing diversity and choice, and downward pressure on housing and land prices.

The potential benefits and costs for assessment in s32 terms are reasonably straightforward. Increasing the level of housing enabled in the economy is generally seen as positive for the community and economy, although the outcomes would generate both costs and benefits.

Potential consequent effects include higher levels of dwelling ownership, and lower housing costs within household living costs. These outcomes are generally considered to be beneficial for the community and economy, and a share of the effects represent benefits to the community at large, including through positive effects on community cohesion.

There are also potential benefits from QMs. The QM-provisions are intended predominantly to retain established conditions and values in the urban environment, which would be lost or diminished if the level of development enabled by Clause 4(1)(b), (c) and Policy 3 were fully implemented in the relevant locations. That loss or diminution represents a loss of benefit (a cost) to the affected community.

These established conditions and values as defined through the RMA process¹⁰ relate to the natural environment (Outstanding Natural Landscapes (**ONLs**), Outstanding Natural Features (**ONFs**), Significant Ecological Areas (**SEAs**), Maunga Viewshafts and Height Sensitive Areas, High Natural Character areas (**HNC** areas)), health and safety and costs (inundation, flooding and erosion), and the built environment (Special Character Areas or **SCAs**). The QMs applying to water and wastewater infrastructure relate to additional costs to the community to fund additional capacity.

The broad weighing up of benefits and costs in s32 terms relates to how the benefits of retaining the conditions and values through implementing the QMs (costs avoided) compare with the benefits foregone if Clause 4(1)(b), (c) and Policy 3 are not fully implemented.

Importantly, the assessment requires more than a simple comparison of dwelling numbers. While numerical analysis is one key aspect of this s32, both the benefits and costs will arise directly and indirectly over time, through a range of urban processes. That is recognised explicitly in the evaluation framework mandated in the legislation, to assess broader impacts including costs and benefits, and in relation to the benefits of urban development and the objectives of the NPS-UD.

That highlights the needs to understand how, when and where the potential benefits and costs of enablement are likely to arise in the Auckland economy. It requires sound understanding of the economy and its housing and property markets, supported by a robust evidence base to examine the relevant matters. Those tasks are core aspects of this s32 assessment. Also relevant is that the spatial distribution of benefits and costs of QM-provisions and housing capacity is not identical. For some QMs such as viewshafts and special character, many of the benefits of protecting / maintaining them are site or locality specific, whereas their effects on housing capacity are generally more spread. That is especially because of the potential for capacity in other sites in the same market to offset limits on capacity on a specific site, and because demand for housing is generally directed to markets rather than specific sites.

2.3.1 Assessment Structure

The effects of PC120 relate directly to the economic processes through which the enabled housing development would occur, and generate costs and benefits. The overall question is the economic, social, cultural and environmental effects which PC120 would generate, including direct and flow-on effects.

In broad terms, housing development generates a range of costs and benefits, and is generally considered to deliver net benefit to the economy and community. A basic consideration is that PC120 will directly affect land use outcomes across a large integrated urban economy and environment. It follows that in addition to effects which arise directly, many other effects will arise indirectly and consequentially from changes in how the Auckland economy will function. This is particularly relevant to the requirements to assess matters in relation to urban development *per se*, and the wide-ranging objectives of the NPS-UD, including the WFUE.

The two broad sets of effects may be expected from urban development, those arising for the Auckland economy and property markets, and those arising for the Auckland living environment, and including:

- a. The direct effects of the provisions on the level of development enabled, including development capacity.

¹⁰ As provisions settled through the statutory planning process including community consultation.

- b. The likely effects of this greater enablement on the Auckland housing market, and the wider land and property markets.
- c. The likely housing and development outcomes for Auckland, from the interactions of the housing development enabled with demand for housing, arising from population and household growth and change.
- d. The likely urban development and growth outcomes for Auckland, arising from the combination of housing growth and other components of urban growth including provision of infrastructure, business activity, and provision of public and private sector services.
- e. At the higher level, the likely impacts through the economy on housing markets and households, particularly dwelling supply and housing value and price implications.
- f. At the economy-wide level, the likely effects from urban form and growth outcomes on the functioning of the economy, including travel and transactions, and agglomeration effects, which affect wider efficiency and sustainability matters.
- g. the differences between PC78 and PC120 in terms of how intensification provisions are distributed geographically. The intensification enabled under PC120 is more centrally located, and is expected to generate higher agglomeration effects as the intensification is located where services and facilities are highly accessible.
- h. in addition, there is likely to be a strong location-specific or site-specific effect from the legislated intensification to take advantage of and support the investment in the City Rail Link (CRL) station locations.

These are broadly the ‘economy performance’ outcomes, affected directly and consequentially by the new housing enablement provisions.

The matters relating to the living environment for the community are:

- a. The direct effects of PC120 and NPS-UD on the living environment, in terms of the development enabled, and the potential development response.
- b. The consequent effects on owners and occupants of the residential living environment.

These are broadly the ‘living environment outcomes’ as affected directly and consequently by the new housing enablement provisions.

At issue is the extent to which the levels of housing development enabled by PC120, and subsequently taken up by the market, are likely to generate adverse effects or costs, in relation to impacts on aspects of the built and natural environment which QM-provisions in the Plan seek to protect or preserve. At the micro-level, such effects may be modelled and analysed by projecting or tracking housing development, and monitoring or estimating the gross and net effects. That is a standard approach for forward-looking assessment of likely or potential outcomes.

In Auckland’s case, the level of development enabled under policy 4(1) in any location may be modelled, and the effects on QM-provisions simulated or estimated.

2.3.2 Plan-enabled Capacity and Demand for Housing

However, the special circumstances in the Auckland market mean that the level of housing development required to provide the additional capacity for the future Auckland population may be provided without material

impact on the QM-provisions. Put another way, the QM-provisions may be retained in the Plan, without material impact on the amount of housing development.

PC120 has to be assessed in the context of the Auckland economy. The 'big picture' has a significant influence on the s32 assessment and the findings.

A key matter is that the level of development enabled under PC120 is very large at 2,069,708 additional dwellings, and is many times the anticipated growth in Auckland's housing demand, into the long term. This arises from the requirement (under Schedule 3C Clause 4(1)) to provide at least the same amount of housing capacity that would have been enabled if PC78 (as notified) were made operative. That capacity would be sufficient to provide for housing demand into the very long term future – in the order of 150-175 years from now, or out to the year 2175 to 2200.

That requirement imposes very long time frames for evaluation, and has significant effects on the benefits and costs of the level of development enabled by PC120. Most of the effects and impacts of the enablement will not arise until many years into the future, and well past the NPS-UD long term time frame of 2023 to 2053. Only a small share of the total capacity enabled will be developed during this period, and most of the effects of enablement, and of QMs will not arise until after the current long term (2053). As a consequence, only a small share of the potential gross effects of QMs on limiting capacity might apply in the NPS-UD long term.

The potential effects of limiting capacity will be further offset because there are large amounts of capacity enabled on other sites in the same markets, which will generally act to push such effects on capacity further out into the long-term future. The benefits and costs in present value terms are accordingly very low.

This is very important for any consideration of the "*costs and broader impacts*" of imposing limits on development capacity, in light of the WFUE and the significance of urban development. In order for the full impact of QMs to occur in the long term to 2053, all of the housing development affected by QMs would need to be developed. The housing demand outlook shows this will not be the case.

3 Effects of PC120 on Auckland Economy

This section addresses the economy context of PC120, and examines the implications of PC120 for the Auckland economy and community. That is in the context of the WFUE and the benefits of urban development. The assessment includes the effects and implications of the QMs in PC120, and their costs and broader impacts.

3.1 Auckland Urban Economy

The economy is the receiving environment for the effects of PC120. The plan change will enable increased development intensity across many locations, especially in more central locations around the city centre and on the Auckland isthmus. The big picture context has a significant influence on the s32 assessment and the findings.

Although the immediate focus is on housing capacity, enabling capacity will affect many aspects of the Auckland economy. Moreover, the evaluation is required to take account of Auckland's well-functioning urban environment (WFUE) and the benefits of urban development. Housing enablement is only one part of that economy-wide context. And while many of the direct or first round effects will stem from the patterns and scale of housing enablement, the WFUE outcomes arise more generally from direct and consequential effects, into the long term.

Three matters have particular significance – the scale of housing enablement, the nature of enablement, and the geographic distribution of the capacity for housing.

As identified, in implementing the replacement plan change, Auckland Council is required to enable a very large amount of housing capacity in order to meet the requirements of Schedule 3C Clause 4(1) of the RMA. That capacity is many times the anticipated growth in housing demand into the long term. Clause 4(1) sets out that Auckland must provide at least the same amount of housing capacity that would have been enabled if PC78 (as notified) were made operative.

That capacity would be sufficient to provide for Auckland's housing demand into the very long term future – in the order of 150-180 years from now, or out to the year 2175 or 2205. This requirement for a very large amount of plan-enabled capacity means there are significant effects on the nature and dimensions of benefits and costs arising, as well as a correspondingly very long time frame over which assessment of effects is required.

In particular, most of the effects and impacts of PC120's enablement, including limits to enablement, will not arise until many years into the future, and well past the NPS-UD's current long term time frame of 2023 to 2053. Only a small share of the total housing capacity which is plan-enabled by PC120 will be in place during this period. As a consequence, most of the effects of QMs, while they are generally identifiable in gross terms, will not play out until well after 2053.

That timing can be expected to affect the nature of housing development. Medium and higher rise development is enabled across many locations, but there is also considerable capacity for low-medium rise development in the form of town and terrace housing. The abundant development capacity in almost all locations provides for considerable flexibility in housing development, especially choices between apartments and generally lower cost terrace housing and units. While PC120 will enable considerable intensification, the extent to which that intensification occurs, and when it will occur, will be driven by a range of influences, including market preferences.

The third matter, the geographic location of plan-enabled housing capacity, is important for many reasons. Most fundamentally, the distribution of capacity will have major influence on the city's growth patterns, and Auckland's urban form outcomes which directly affect the efficiency with which the economy functions, including business and household interactions, the provision of infrastructure, and the living environment for the community. Urban efficiency in turn directly influences sustainability. At the same time, the wide opportunity for more intensive development may see market preferences focus on particular areas.

3.1.1 The Multi-Nodal economy

Auckland is a large and well-established multi-nodal economy. The CBD is supported by a network of metropolitan centres and major business hubs (including the airport and seaport), and at the next level in the urban hierarchy by the network of town centres and local centres. A characteristic of larger cities like Auckland is that business and population growth sees the spatial economy evolve from an initial small mono-centric town to this multi-nodal structure, which expands spatially to efficiently meet the needs of businesses and households. The city centre continues to grow, though its share of the economy and economic activity – business, employment and residential – diminishes over time, as economic activities viably establish outside the city centre to (more) efficiently satisfy market demands, and their operational preferences.

The multi-nodal structure generally represents an efficient urban form. A key reason is that as economies increase in size, the city centre's relative advantages of accessibility and co-location diminish. Increasing city size generally sees these advantages continue to grow over time, but gains by second- and third-level centres means the CBD's relative advantage is reduced¹¹.

Auckland has continued to develop as a multi-nodal urban economy for well over a century, and there is no indication that this structure is changing or is likely to change, nor strong rationale that it would be efficient to do so. Continued investment in transport infrastructure (especially city rail) is a key part of maintaining or enhancing the CBD's carrying capacity, and its role within the economy.

The NPS-UD's orientation to the multi-nodal urban form, to support both a strong CBD and a robust structure metropolitan, town and local centres is consistent with urban processes. The core central place dynamics which influence centres at every scale within Auckland, are reflected on Policy 3(b) and 3(d) and are important when assessing the consistency of the patterns of plan-enablement in respect of Policy 3, and the WFUE.

3.1.2 Role of the city centre

The place and role of the city centre is key consideration, relating to all Policy 3 and the objectives of the NPS-UD, and the WFUE. Although PC120 does not impact directly on housing enablement in the city centre, the city centre's capacity is a relevant part of the overall mix.

In Auckland, like most cities, there is a general orientation to the city centre as the largest hub of economic activity, and proximity to the city centre for its employment, shopping and recreational attributes is generally reflected in urban densities and land values. That said, while the CBD is the largest single node of activity, it is

¹¹ There is a considerable literature on urban modelling using a mono-centric model, especially the Alonso-Mills-Muth (AMM) model. However, globally the mono-centric city is very rare, not least because the basic economics of a single large centre hub serving a large population are poor.

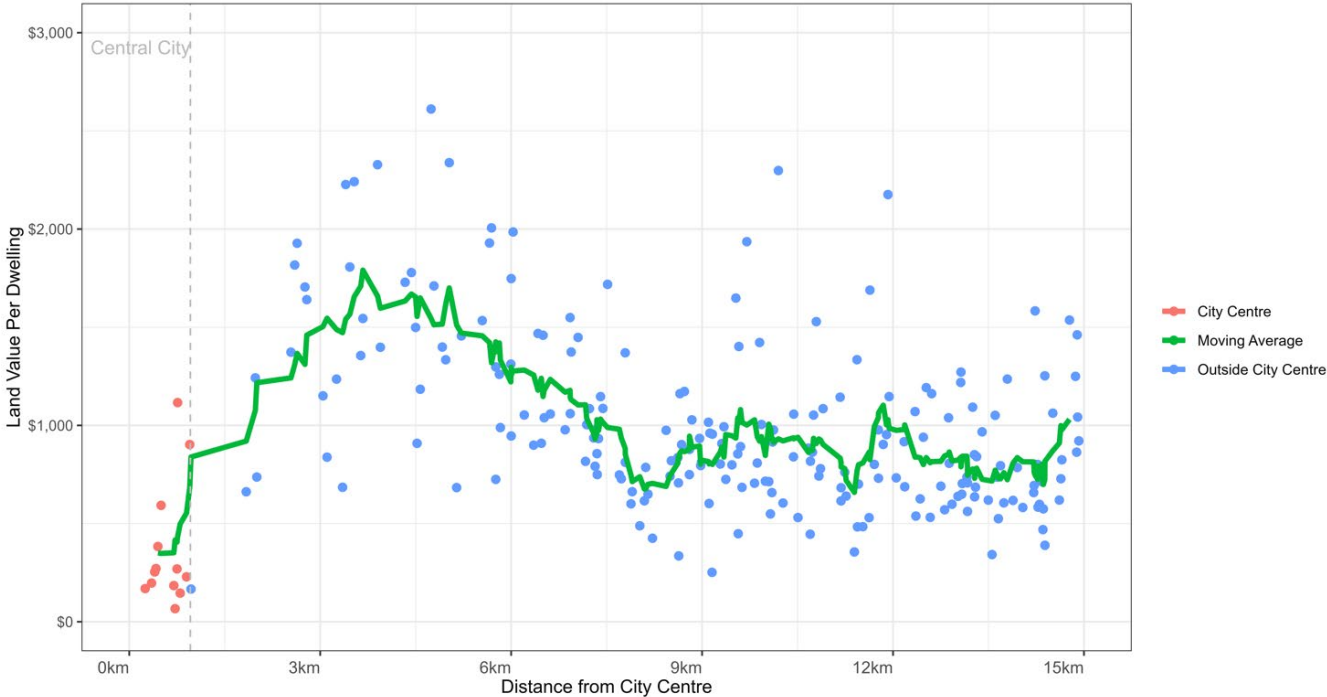
one centre within the overall centres network, and one location with quite specific attributes in terms of housing and the living environment.

The CBD is the most attractive location for many businesses to operate, however Auckland also has many other locations which are equally or more attractive for businesses and households. For many businesses, especially for multi-branch service and business activities which serve the urban market from multiple locations, the CBD is one of a number of potential locations, and the slow decrease in the CBD’s share of total economic activity reflects this.

The city centre is also the preferred location for a small share of the Auckland housing market (around 3.5%). This small share reflects the relative attractions of the central city, including the inner-city living environment, and the proximity to employment and services which it offers. For most of the Auckland market, the city centre is not the most preferred location. Reasons include the living environment, dwelling choice limited to apartments in most instances high-rise, the juxtaposition with a large workforce, and limited outdoor space, as well as high property costs. These matters were addressed in the 2023 hearings on the Auckland City Centre.

The relative attractiveness of the city centre is an important consideration for the wider Policy 3 assessment, and the roles of other locations in meeting housing needs. Although one aspect commonly cited is the high mean land values per m² in the city centre as indicating high consumer preferences to live there, the evidence from residential property values is that suburban locations around the city centre are more preferred as a place to live and/or purchase property. In my view, land value per site is a better indicator of location preference than is \$ per m² of land area since that better reflects households’ willingness to pay to be in a location. Figure 3-1 shows mean land values per dwelling by distance from the city centre (\$2021 terms) drawing from Council’s property dataset. Each point on the graph reflects the mean site value in one SA2 area. The graphic shows that land value per dwelling is substantially lower in the city centre than it is in the surrounding suburban areas. If land value per site were taken by itself as a key indicator of location preference, then it would imply that the median or average household does not prefer to live in the city centre itself.

Figure 3-1: Mean Land Value per Dwelling from CBD to urban edge



Residential demand is one component of overall demand, and land value shows a mix of influences. The lower values per dwelling in the city centre do not show that there is low preference among all households, rather that some segments of the market may have high preference to live there as it suits their needs, whereas for other segments it is less attractive, and their preferences are for other locations.

There is considerable capacity for residential apartments in the city centre, with indicated potential for another 40-60,000 dwellings beyond the current 23,000 in the centre. This suggests there is plan-enabled capacity to cater for future demand within the city centre, to complement plan-enabled capacity around the city centre in residential zoned sites. That capacity has not been examined specifically in relation to the replacement plan change process, and the indication is drawn from the research done for the city centre hearings in 2023.

The lower preference for the city centre as a place to live is consistent with patterns of new consenting. Substantial shares of the new dwellings which have been added as Auckland has intensified under the AUP have been oriented toward metropolitan and town centres rather than to the CBD, with intensification around centres including Takapuna, New Lynn and Henderson.

This makes it important for development and growth needs to be provided for in a range of locations across the city, and it is not a matter of seeking only to maximise development in and around the city centre. Business and residential activities need land, a fixed resource, and the intensification of activity results in a range of benefits and costs, including those arising from built urban form. That applies to plan-enabled capacity for housing, characteristically involving trade-offs between living space and location, as well as prices, which sees a mix of preferences within the housing and property markets, and a mix of abilities to pay. For those reasons, new housing development shows some spatial concentration, but it is spread throughout Auckland as suppliers respond to development and market opportunity.

3.1.3 Patterns of Enablement

The assessment also considers geographic patterns of plan-enabled housing capacity, in relation to business and household activity, to understand the implications for how the city will function into the future. These urban form outcomes are especially important for assessing the WFUE and the 'significance of urban development', and other NPS-UD objectives. That said, the large amount of plan-enabled capacity throughout Auckland under PC120 means there is substantial opportunity for development in many places for developers and purchasers.

The distribution of effects within Auckland has a strong influence on their materiality and implications for the WFUE. The legislation requires site-specific assessment, and the SA2 structure has been utilised to show outcomes across the economy at a finer level than the LBAs.

PC120 will enable substantial additional capacity for housing in Auckland. The scale of enablement is a key driver of the likely effects, especially because of the imbalance between demand and plan-enablement:

- a. The net additional capacity in Residential zones is estimated at 1,595,340 in the Baseline, and 1,474,840 under PC120 (Table 3-1)
- b. The net additional capacity in Business zones is estimated at 478,606 in the Baseline, and 581,878 under PC120.
- c. That would provide total additional capacity for 2,069,708 dwellings under PC120. That is 4,238 dwellings fewer than the Baseline estimate if PC78 were in place.

Table 3-1 : Auckland Plan-Enabled Capacity under Baseline and PC120

Model	Residential	Business	Total
Baseline	1,595,340	478,606	2,073,946
PC120 HIRv3	1,487,830	581,878	2,069,708
<i>Difference</i>		-	4,238

As noted, this does not represent a complete picture of Auckland’s housing capacity, as it does not include a comparison of capacity between PC78 as notified and PC78 as operative for the City Centre zone or the Metropolitan Centre zone, noting that the Council is still to make decisions on the IHP recommendations for the Metropolitan Centre zone. It also does not include housing capacity for the Future Urban Zone (FUZ), or other rural areas.

3.1.4 Housing Demand

Auckland’s demand projections of future households relate to the whole region, and are not limited to the areas covered by the Baseline and PC120 modelling. At the high level, one appropriate basis for comparing demand and enablement is total Auckland capacity including the CBD and the FUZ area, and total region household growth.

Auckland region’s total housing demand outlook is for an additional 260-340,000 households and dwellings over the 30 years to 2053¹² (medium and high¹³ projections). Not all of this will be in urban Auckland, and shares of that growth would occur in the city centre, in the FUZ as it becomes live-zoned, and in rural areas.

In broad terms, the plan-enabled capacity under PC120 is around 6 times (high projection) to 9 times (medium projection) the amount of demand expected for additional dwellings in the 2023-53 period. That is order of magnitude, as not all enabled capacity becomes feasible to develop even in the very long term.

The assessment here is based on allowing for 94% to 96% of growth (315,000 to 325,000 households) to occur in areas subject to PC120 and Business zones, taking into account the scale and nature of plan-enabled capacity, consumer preferences and housing affordability.

3.1.5 Demand vs Capacity Enabled

The imbalance between enablement and demand means it is important to examine the effects of PC120, especially QMs, on a like-for-like basis. Although the PC120 provisions will enable capacity on paper, most of the impacts will not arise until that enabled capacity has reasonable expectation of being developed in the Auckland market, and can influence market decisions.

The housing demand outlook suggests that on average around 16 to 17% of the total plan-enabled capacity will be taken up by the market over the next 30 years (2023-53). Accordingly, this means that around 16-17% of the potential gross effects of the enablement, and the gross effects of QMs, would accrue by 2053. Much of the impact of QMs will remain a potential or possible impact, to occur later than 2053.

¹² applying a 2023 base year for projections.

¹³ Based on StatsNZ population projections released September 2025.

To assess the impacts of capacity plan-enabled under PC120, and any impacts of limiting development capacity, this s32 analysis allows for the impacts to arise progressively over the 2023-2053 period and up to 150-200 years beyond that (high and medium futures), in line with total anticipated development of Auckland's housing capacity. The impacts, as positive effects (benefits) or negative effects (costs), are identified in the relevant time periods, and are identified in Present Value terms, applying standard discount rates.

The assessment of a Plan Change over such a long time period is not common, especially when the greatest share of impacts will occur many years beyond the standard NPS-UD long term of 30 years. The time period is dictated by the legislation, which specifies in Clause 4(1)(a) of Schedule 3C that the amount of plan-enabled housing capacity must be at least as much as enabled by PC78 (as notified) were made operative. The amount of plan-enabled capacity in PC78 was dictated by the requirement to incorporate the MDRS throughout Auckland's relevant residential zoned areas, irrespective of the level of demand for housing, or the effects on the land market of providing for land unlikely to be intensified for decades.

3.1.6 Time and Economic Assessment

To assess the effects of PC120 on enabling capacity, it is relevant to consider outcomes throughout the period in which the enablement is likely to translate as housing development. On that basis, the simplest future would be one where the enabled capacity was progressively developed until the potential was fully utilised. However, the long time frames mean that is unlikely to be the case, as there is potential for two or more development cycles where the development enabled under PC120 occurs, and then ages until it reaches the end of its economic life and is then replaced according to the conditions of that future time.

This means the timing of new development, and the relative scale of demand and enablement, are important aspects of the impact assessment. The effect of timing is a standard part of most economic analysis, and there are established methods for this, particularly the use of discounting to estimate the Present Value (PV) of benefits and costs.

The alternative of assuming all of the impacts will arise within the 2023-53 period has little to support it. It is highly unlikely that the Auckland housing market would see new housing development focus only on sites and locations where QMs will have effect, to develop that QM-affected capacity first as the highest priority. Even if the analysis focused only on sites affected by at least one QM, the total plan-enabled capacity on those sites is substantially greater than the total expected demand by 2053. There would not be enough demand to take up all of the QM-affected capacity over the 30 year period, even if there were no development on any sites not affected by a QM.

3.1.7 Scenario Approach

The Council modelling has provided estimates of plan-enabled capacity and net additional capacity (over and above existing built capacity) at the site level throughout Auckland. These detailed outputs have been examined to identify the overall plan-enabled capacity, and the implications for growth in the economy and change in Auckland's urban form, both of which contribute directly to the WFUE.

The site-level estimates are aggregated in the analysis to identify capacity in each local SA2 market, and further aggregated to the LBA level. At the same time, there is further breakdown to show the nature and geography of enablement, including capacity by SA2 location, and for sites which are potentially affected by QMs, and those which are not affected.

To address the potential outcomes, a simplified scenario approach has been applied to allow for two general future patterns of housing growth out to 2053. The base case is the Council's AGSv1 projection, for household numbers at the SA2 level out to 2053. The alternate scenario tested allows for growth patterns to reflect more closely the new patterns of plan-enabled housing capacity, in effect a significant shift in response to PC120.

In both scenarios there is further variation applied, where the effects of inferred housing preference and proximity to the city centre are given weight. This means greater shares of growth are attracted to preferred areas and the more central areas of the city than in the AGSv1 scenario or PC120 base case. Relative housing preference uses mean dwelling value at the SA2 level to indicate attractiveness, while the proximity weighting reflects distance from the CBD relative to the Auckland mean. Dwelling value is applied as a more accurate indicator of preference than land value per m², as it better reflects household purchasing choices, and helps avoid some of the distortions in the land value per m² indicator which arise from competitive effects of non-residential activity, and the influence of land scarcity (as distance from the CBD reduces). We note that both weightings are applied as broad and generalised effects, reflecting the range of price and location options to developers and purchasers.

The structure applied is to examine the two core scenarios. These focus on the amount of plan-enabled capacity in relation to future housing needs of the Auckland population, and the effects of the QMs as they vary by location.

3.1.8 Capacity and Growth by LBA

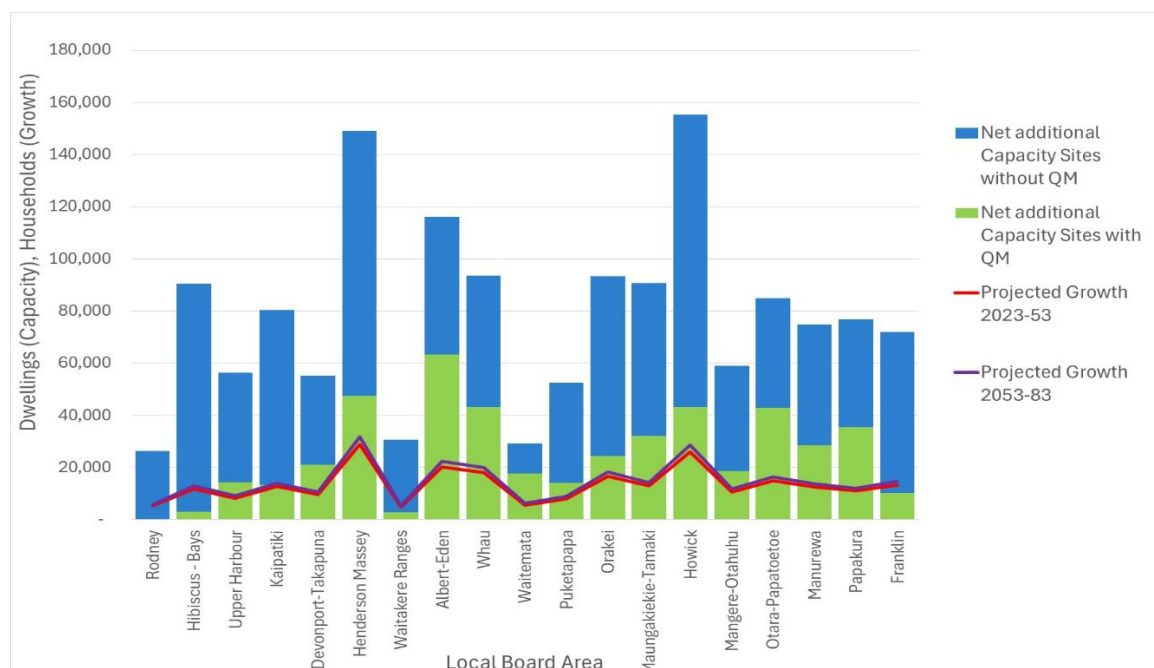
At the high level, PC120 will provide very substantial plan-enabled capacity for housing growth throughout Auckland. An overall picture of enabled capacity and possible future growth outlook has been developed for the Local Board Areas (LBAs) in the first instance, to show the substantial enabled capacity by location across the region. There is substantial capacity throughout Auckland. Total plan-enabled capacity is for 1,487,830 dwellings, with the largest share identified for the Howick LBA, but with substantial capacity in every LBA.

The graph also shows the projected housing demand in each LBA over the next 30 years to 2053 (red line) and the very long term to 2083 (purple line). In all LBA areas, the analysis of demand and capacity shows there is a wide margin, with no indication of supply pressure overall within the next 6 decades, and beyond. This is clear even though the share of plan-enabled capacity potentially affected by one or more QMs varies considerably among the LBA areas. In this regard it is important to note that the plan-enabled capacity estimates show the total after allowance is made for all effects of QMs acting to "limit development capacity".

Table 3-2 : Growth Parameters by Local Board Area

LBA Parameters of Any Overlay / QM													
	Any Overlay / QM Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-83	Projected Growth 2053-83 as % Capacity
Top 25 SA2s	52,075	502,444	476,983	1,010,847	1,487,830	1,730	1,178	552	440,975	252,501	17%	278,397	19%
Rodney	-	17,461	-	26,499	26,499	1,478	894	583	16,829	5,319	20%	5,862	22%
Hibiscus - Bays	424	42,492	3,193	87,218	90,411	1,664	1,028	636	19,523	11,805	13%	13,014	14%
Upper Harbour	1,331	23,301	14,359	42,140	56,499	1,832	1,092	740	12,952	8,347	15%	9,201	16%
Kaipatiki	1,522	31,426	13,360	67,147	80,507	1,586	1,014	572	8,095	12,741	16%	14,050	17%
Devonport-Takapuna	2,585	21,927	21,020	34,153	55,173	2,736	1,931	805	6,436	9,758	18%	10,759	20%
Henderson Massey	3,961	38,812	47,578	101,440	149,018	1,229	860	368	18,437	28,830	19%	31,789	21%
Waitakere Ranges	254	14,781	2,865	27,931	30,796	1,152	714	438	8,958	4,888	16%	5,389	17%
Albert-Eden	7,334	32,881	63,324	52,933	116,257	2,649	2,015	634	16,420	20,299	17%	22,380	19%
Whau	3,752	26,944	43,303	50,412	93,715	1,462	1,018	444	9,662	18,174	19%	20,039	21%
Waitemata	4,556	14,920	17,840	11,445	29,285	3,729	2,690	1,039	15,406	5,734	20%	6,323	22%
Puketapapa	1,620	18,547	14,220	38,369	52,589	1,718	1,269	449	7,860	8,130	15%	8,962	17%
Orakei	2,367	32,404	24,449	68,911	93,360	3,365	2,417	948	10,798	16,713	18%	18,427	20%
Maungakiekie-Tamaki	3,238	26,360	32,218	58,494	90,712	1,874	1,371	503	10,484	13,031	14%	14,368	16%
Howick	5,456	48,752	43,240	112,083	155,323	1,732	1,173	559	80,818	26,092	17%	28,771	19%
Mangere-Otahuhu	1,857	19,952	18,627	40,473	59,100	1,172	813	360	8,831	10,751	18%	11,853	20%
Otara-Papatoetoe	4,892	23,092	43,033	42,013	85,046	1,209	855	355	17,136	14,929	18%	16,461	19%
Manurewa	2,960	26,488	28,529	46,270	74,799	1,067	699	368	15,976	12,562	17%	13,848	19%
Papakura	3,852	20,849	35,509	41,223	76,732	1,160	733	427	99,071	11,032	14%	12,163	16%
Franklin	114	21,055	10,316	61,693	72,009	1,174	726	448	53,561	13,366	19%	14,738	20%

Figure 3-2: P-E Capacity and Projected Growth by LBA



The fine-grained analysis of capacity at the SA2 level within each LBA area also shows that there is substantial plan-enabled capacity within each local market. This indicates that even with QMs acting in some instances to “*limit development capacity*” at the site level, there is substantial capacity for that demand to be met within the same local market. It is not a case of demand being directed to other markets by QMs. The other major feature evident at the LBA level is the small share of plan-enabled capacity under PC120 which would be taken up by demand for additional dwellings. This is important, because it indicates there is low prospect of supply-side

constraints acting to inflate land and housing prices. There is low demand relative to capacity overall, and it is also easy to re-direct potentially unsatisfied demand to alternate locations within the same markets. Both of these conditions indicate low supply-side price pressures.

3.2 Effects of PC120 Overlays and QMs

The second part of the assessment considers the implications of Overlays and potential QMs in PC120, which could see lesser levels of housing enablement than provided for in the RMA. While any difference in enablement requires initial attention, the focus remains on the amount of capacity enabled in relation to demand, taking account of location and development potential, in regard to the housing requirements of the Auckland community and market.

3.2.1 Effects of Enabling Housing Capacity

The direct effects of PC120 and the QMs are on the level of development enabled. This is principally in terms of the numbers of dwellings enabled. However, to assess the impacts of that enablement it is necessary to go beyond the level of development enabled on paper, to consider the key parameters of the level of development enabled, particularly the numbers and types of dwellings, and their location across Auckland. It is especially important to examine how the plan-enabled development will likely be manifest as actual housing development 'on the ground'. The impacts will arise predominantly from the actual housing development which occurs, with only a very small proportion of the effects arising from the plan-enablement on paper, especially given the very large amount of capacity enabled and the long time frames before any additional enablement is likely to be realised. The analysis of effects has to assume that the enablement will lead to actual development, including a pattern of urban growth, and effects on urban form and function.

The enablement and subsequent development of housing capacity will flow through directly and indirectly on the functioning of the Auckland economy. Key effects will be on patterns of demand for household goods and services, the consequent development opportunity for business capacity and business activity to meet household demands, business activity patterns, associated employment opportunity, and demand for travel (journeys to work, to shop, to education, to recreation) and goods movement to service the economy.

At the high level, the large amount of capacity enabled in all locations provides substantial opportunity for development of housing in response to market demand and preferences throughout Auckland. The wide variety of zonings, plan provisions, densities and locations mean there will be substantial opportunity to deliver a wide range of dwelling typologies and value bands (price ranges) across multiple locations. Housing development patterns are unlikely to be restrained.

That housing development in turn will support future growth and development in business activity in centres and business areas. The HBA¹⁴ 2023 identified substantial capacity for growth by Auckland's business sector, and the level of housing development enabled is expected to support that opportunity and choice for business development. The housing and business development patterns in combination indicate a relatively efficient future growth outcome for the region, with opportunity for growth patterns to reflect demand for different locations across the economy.

¹⁴ The Housing and Business Development Capacity Assessment required under Subpart 5 of the NPS-UD 2020.

Broadly, this means the patterns of housing development and business growth can be expected to contribute positively to the WFUE. The enabled opportunity for housing to see the residential construction sector deliver the level of development which the market is able to sustain, including to reflect demand choices and abilities to pay. Both aspects are expected to contribute positively to the WFUE and the benefits of urban development, consistent with the objectives of the NPS-UD and the RMA.

Those outcomes are directly relevant to the assessments specified in clause 8(2) and 8(4), and 8(5). The “*costs and wider impacts*” of development are directly relevant to both the scale and nature of urban development enabled and the effects of limiting development capacity. There is not one framework for considering the growth which enabled, and another for examining potential limits to growth.

Drawing these aspects together, the implications of the Council modelling results have been analysed to show:

- a. the scale of housing enablement, overall and by location
- b. the nature of housing enablement, overall and by location
- c. the net effects of QMs
- d. the implications for the WFUE and urban development.

The effects of PC120 have been assessed with direct reference to the development and growth outcomes enabled, as the critical aspects which will determine the impacts:

1. the scale of plan-enabled capacity, with reference to both the overall requirement under clause 4(1)(a), and the objectives to enable growth in relatively central and relatively preferred locations
2. the location of plan-enabled capacity, with site-specific assessment across 628 markets (SA2 areas) within Auckland
3. the nature of plan-enabled capacity in respect of the nature of housing and development heights
4. the effects of QMs on the enablement of growth
5. the opportunity for development to occur on other sites within the same market (in regard to QM effects)
6. the distribution of demand, to show projected growth by SA2 market.

These components have been drawn together in graphs and table structures to illustrate the outcomes at the market level (individual SA2 areas), at a higher level for LBAs, and overall for Auckland as a whole. The standard format adopted shows the key parameters for each location or geographic area and each SA2 market:

1. the overall plan-enabled capacity on sites potentially affected by one or more QMs (green bar)
2. plan-enabled capacity on sites which are not affected by a QM (blue bar)
3. estimated demand for dwellings in the 2023-53 period (red line)
4. estimated demand for dwellings in the 2023-85 period (purple line).

The standard table format portrays for each SA2 market

1. existing dwellings
2. net additional capacity on sites with a QM
3. net additional capacity on sites without a QM
4. net total additional capacity
5. mean capital value all sites
6. mean land value all sites
7. mean improvement value all sites

8. projected growth (numbers and %) to 2053
9. projected growth (numbers and %) to 2085.

The property value data provides context of the local SA2 market. Note that in the example table, the growth rates in SA2 areas with relatively high mean capital values and/or closer to the city centre are higher than the norm, indicating market response to the higher weighting assigned to those influences.

3.2.2 Capacity with Overlays including QMs

The modelling to date shows that PC120 would enable 2,069,708 dwellings, or 4,238 fewer (-0.2%) than the estimated 2,073,946 under the Baseline (or notional PC78). The modelling does not include the housing capacity provided through the operative provisions of the City Centre zone and the Metropolitan Centre zone as compared with the provisions in PC78 as notified.

It is important to recognise that this is the enabled capacity under PC120 with all QMs in place. Capacity without QMs in place would be greater. The Baseline modelling also assumes that QMs are in place. The plan-enabled capacity is sufficient for approximately 150-175 years of household growth. An important implication of these base numbers is that the Auckland-wide effect of all QMs combined has, in aggregate, minimal effect on housing capacity.

In that circumstance, the main effects of QMs on housing capacity would arise from the incidence and distribution of housing capacity, rather than effects on the level of development enabled. While analysis of the potential effects of individual QMs may show that there would be an impact on the level of development, in the final analysis with all QMs and other provisions considered holistically, there is likely to be a minimal effect beyond the long term.

This is an important finding in relation to the potential effects of Overlays including QMs, especially because assessment in terms of the WFUE and the benefits of urban development is holistic, including but extending beyond development capacity *per se*. If the effect on enabled development capacity is small, then those other effects are accordingly more significant.

Although the initial focus is on limiting enablement, as per clause 8(2)(b) and (c), and 8(4), and clause 8(5) for existing QMs, beyond the assessment turns to examination of the effects of enablement, in Policy 3 terms.

3.2.3 Walkable Catchments

This analysis considers first areas of significance across Auckland, to consider the WC areas and Policy 3(d) areas. The plan-enablement, capacity, and demand patterns across key market locations in WC areas is shown in Figure 3-4. This figure is important, because it draws together all the principal elements of PC120. It shows location, the levels of enablement under PC120, in relation to expected demand for housing, by location. The figure is supported by the summary table ([Table 3-3](#)) showing totals for the WC areas and detail for the top 25 SA2 areas.

[Table 3-3](#) indicates there is extensive capacity in the WC areas overall. On the 36,977 residential zoned sites within the WC areas, there are 153,583 existing dwellings and potential to increase this by nearly 5 times on both sites subject to QMs, and those with no QM. The figure shows the make up of the additional plan-enabled capacity on sites with a QM (green) and sites with no QM, and the wide geographic spread of that capacity across many SA2 areas – albeit generally in the more central areas of the city. There is very substantial capacity throughout the WC areas, as would be expected with PC120 provisions which enable significant height in centres and areas adjacent to centres.

The figure and table show only the Residential zoned areas. Within the WC areas there is further capacity in business zones, with the modelling indicating a total capacity for more than 990,000 plan-enabled dwellings in Residential and Business zones. That includes capacity in most business zoned areas, but does not include the capacity in the CBD itself¹⁵.

The very high level of enablement in WC areas is an important part of Auckland's urban form outcomes, and overall urban efficiency. It reflects the relative proximity of enablement to centres especially, including to support walkability and active modes in people movement. That in itself reflects a strong positive contribution to the WFUE.

The figure draws together the demand and supply side aspects of the assessment. The stacked bars show the amount of capacity enabled (numbers of net additional dwellings), while the lines on the graph show projected housing growth, or the take-up of plan-enabled capacity into the long term to 2053 (black line on the graph) and the very long term 2023 to 2085 (red line on the graph).

Demand relative to supply is a key indicator. The pattern in Figure 3-4 reflects the wide geographical spread of enabled capacity as well as the depth, with significant levels of plan-enabled capacity in almost every local market (SA2 area). The estimated uptake of capacity is also shown in the table.

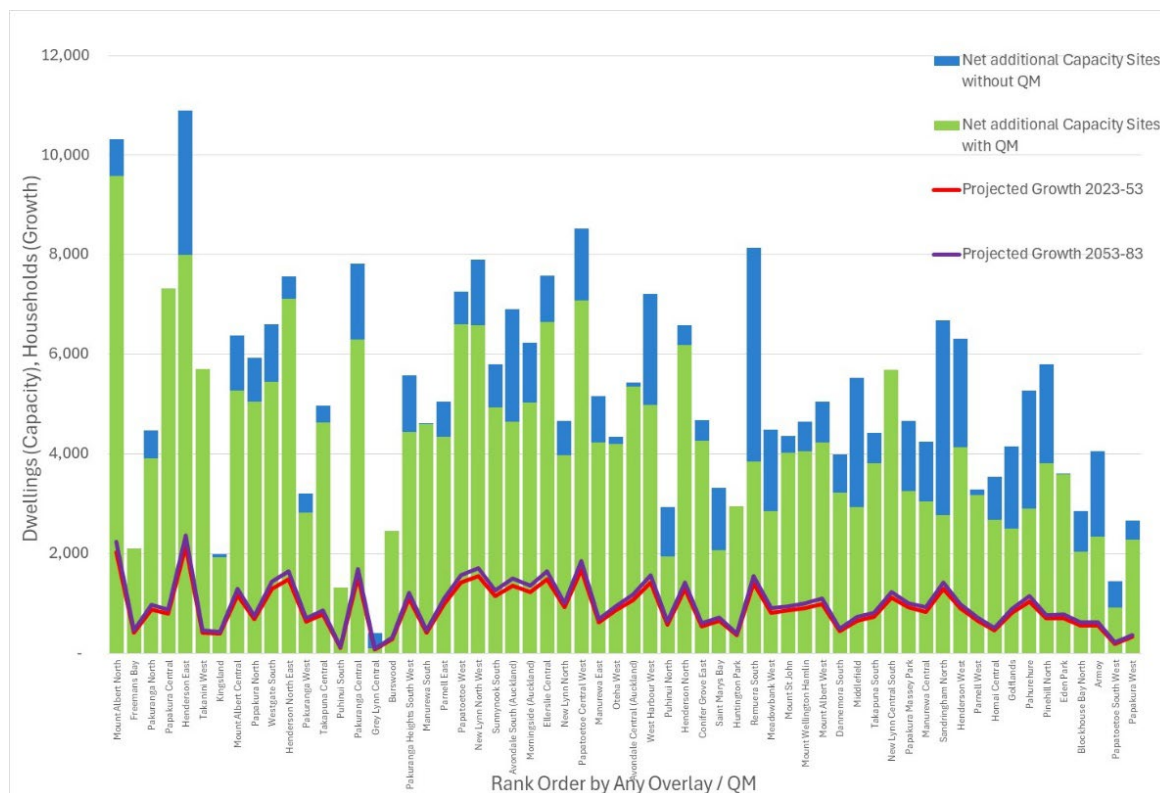
Although the overall uptake in the long term is estimated at 13-14% of total plan-enabled capacity, the modelled uptake is higher in the WC areas closer to the city centre, and in locations of higher average residential property value.

¹⁵ That was indicated for the City Centre hearings as being in the order of 65,000 additional dwellings, though the final estimates of its capacity are still being developed.

Table 3-3 : Parameters of Locations in Walkable Catchments

Parameters of Any Overlay / QM													
	Any Overlay / QM Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-83	Projected Growth 2053-83 as % Capacity
Total Auckland 178 SA2s	36,977	153,583	360,841	280,534	641,375	1,872	1,299	574	73,498	112,205	17%	123,714	19%
Top 25 SA2s	13,993	26,989	120,283	18,537	138,820	1,973	1,403	570	10,937	24,364	18%	26,861	19%
Mount Albert North	847	1,420	9,587	725	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Freemans Bay	717	1,378	2,108	-	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Pakuranga North	636	929	3,915	558	4,473	1,584	1,134	450	290	880	20%	970	22%
Papakura Central	604	1,259	7,331	-	7,331	1,532	969	563	482	799	11%	881	12%
Henderson East	603	1,462	7,992	2,907	10,899	1,234	910	325	857	2,145	20%	2,365	22%
Takanini West	601	805	5,704	-	5,704	1,214	787	428	448	418	7%	461	8%
Kingsland	593	961	1,929	60	1,989	1,765	1,392	373	276	391	20%	431	22%
Mount Albert Central	588	1,207	5,275	1,102	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Papakura North	583	1,133	5,044	883	5,927	1,092	725	366	620	681	11%	751	13%
Westgate South	556	801	5,454	1,146	6,600	1,484	990	494	1,466	1,299	20%	1,432	22%
Henderson North East	546	970	7,119	438	7,557	1,374	1,020	354	309	1,487	20%	1,640	22%
Pakuranga West	544	973	2,823	384	3,207	1,339	912	427	311	631	20%	696	22%
Takapuna Central	541	1,035	4,630	341	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Puhinui South	536	722	1,316	-	1,316	1,151	696	455	205	109	8%	120	9%
Pakuranga Central	535	1,040	6,298	1,524	7,822	1,507	1,076	430	588	1,539	20%	1,697	22%
Grey Lynn Central	535	1,156	108	299	407	2,682	2,028	654	339	80	20%	88	22%
Burswood	534	532	2,462	-	2,462	1,211	796	416	33	287	12%	316	13%
Pakuranga Heights South West	532	1,083	4,437	1,141	5,578	1,322	992	330	243	1,098	20%	1,211	22%
Manurewa South	508	771	4,600	16	4,616	1,149	796	353	384	414	9%	456	10%
Parnell East	506	1,530	4,339	711	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Papatoetoe West	490	1,138	6,609	650	7,259	1,328	941	387	462	1,428	20%	1,574	22%
New Lynn North West	485	1,141	6,588	1,315	7,903	1,401	834	567	461	1,555	20%	1,714	22%
Sunnynook South	469	781	4,934	875	5,809	1,446	1,100	347	242	1,143	20%	1,260	22%
Avondale South (Auckland)	456	1,483	4,644	2,266	6,910	1,465	1,061	403	778	1,360	20%	1,499	22%
Morningside (Auckland)	448	1,279	5,037	1,196	6,233	2,040	1,521	519	356	1,227	20%	1,353	22%

Figure 3-3: Markets in Walkable Catchments



3.2.4 Policy 3(d) areas

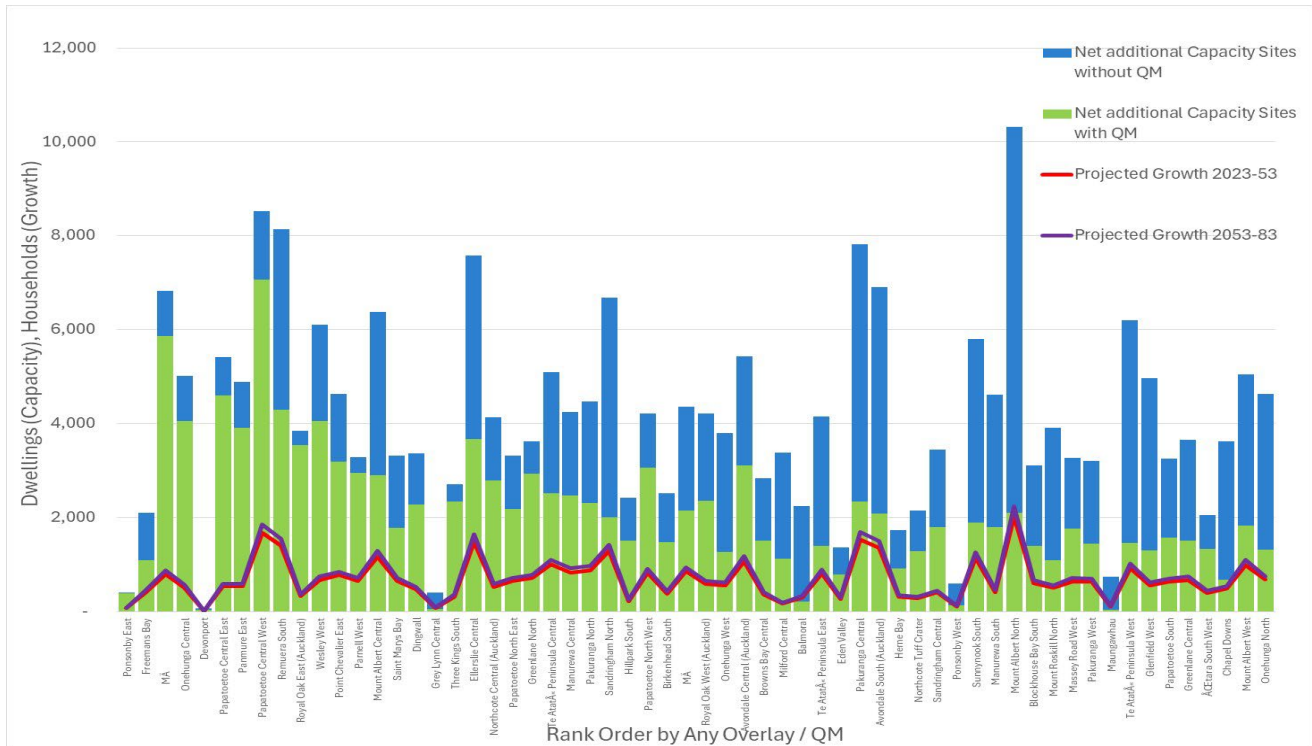
Plan-enablement, capacity, and demand patterns across the Policy 3(d) areas is shown in Figure 3-4 which is supported by Table 3-4. This indicates there is extensive capacity in the Policy 3(d) areas. The policy 3(d) areas contain an estimated 177,055 dwellings on 22,441 residential zoned sites, with plan-enabled potential for around 5 times that. The total enabled capacity on residential and business zoned sites in the Policy 3d areas is in the order of 700,000 dwellings.

This shows that PC120 is providing for substantial capacity in the priority areas indicated in the NPS-UD Policy 3 settings for both the WC areas and Policy 3(d) areas around the medium and smaller centres.

Table 3-4 : Parameters of Locations in Policy 3(d) Areas

Parameters of Any Overlay / QM													
	Any Overlay / QM Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-83	Projected Growth 2053-83 as % Capacity
Total Auckland 185 SA2s	22,441	177,055	190,052	437,637	627,689	2,034	1,452	582	66,620	105,357	17%	116,163	19%
Top 25 SA2s	9,350	26,966	73,295	34,648	107,943	2,428	1,752	676	9,832	17,203	16%	18,967	18%
Ponsonby East	742	1,083	392	1	393	2,794	2,182	611	88	77	20%	85	22%
Freemans Bay	576	1,378	1,091	1,017	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Māngere Central	553	847	5,863	964	6,827	1,201	931	269	346	798	12%	880	13%
Onehunga Central	480	1,283	4,054	965	5,019	2,408	1,598	809	767	516	10%	569	11%
Devonport	461	1,318	43	21	64	2,623	1,644	978	65	9	14%	10	16%
Papatoetoe Central East	445	887	4,594	831	5,425	1,595	1,136	459	408	536	10%	591	11%
Panmure East	441	1,143	3,914	983	4,897	1,701	1,282	419	419	534	11%	589	12%
Papatoetoe Central West	439	1,187	7,061	1,468	8,529	1,763	1,272	490	580	1,678	20%	1,850	22%
Remuera South	404	1,430	4,302	3,839	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Royal Oak East (Auckland)	385	1,042	3,552	292	3,844	2,948	2,270	678	342	327	9%	361	9%
Wesley West	382	749	4,061	2,040	6,101	1,373	1,191	182	157	677	11%	746	12%
Point Chevalier East	380	1,144	3,189	1,449	4,638	2,084	1,589	494	356	774	17%	853	18%
Parnell West	330	1,137	2,947	335	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Mount Albert Central	317	1,207	2,906	3,471	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Saint Marys Bay	309	891	1,781	1,543	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Dingwall	298	770	2,278	1,097	3,375	1,291	957	334	339	471	14%	519	15%
Grey Lynn Central	294	1,156	60	347	407	2,682	2,028	654	339	80	20%	88	22%
Three Kings South	284	859	2,340	372	2,712	2,278	1,589	689	402	325	12%	358	13%
Ellerslie Central	272	1,165	3,665	3,922	7,587	3,651	2,940	712	372	1,493	20%	1,646	22%
Northcote Central (Auckland)	271	1,350	2,785	1,356	4,141	2,647	1,610	1,037	1,298	532	13%	587	14%
Papatoetoe North East	269	960	2,177	1,148	3,325	1,344	975	369	384	654	20%	721	22%
Greenlane North	263	679	2,932	686	3,618	3,625	2,819	806	186	712	20%	785	22%
Te Atatū Peninsula Central	257	1,207	2,521	2,570	5,091	1,365	947	418	672	1,002	20%	1,105	22%
Manurewa Central	253	1,165	2,473	1,772	4,245	1,322	863	459	379	835	20%	921	22%
Pakuranga North	245	929	2,314	2,159	4,473	1,584	1,134	450	290	880	20%	970	22%

Figure 3-3: Markets in Policy 3(d) Areas



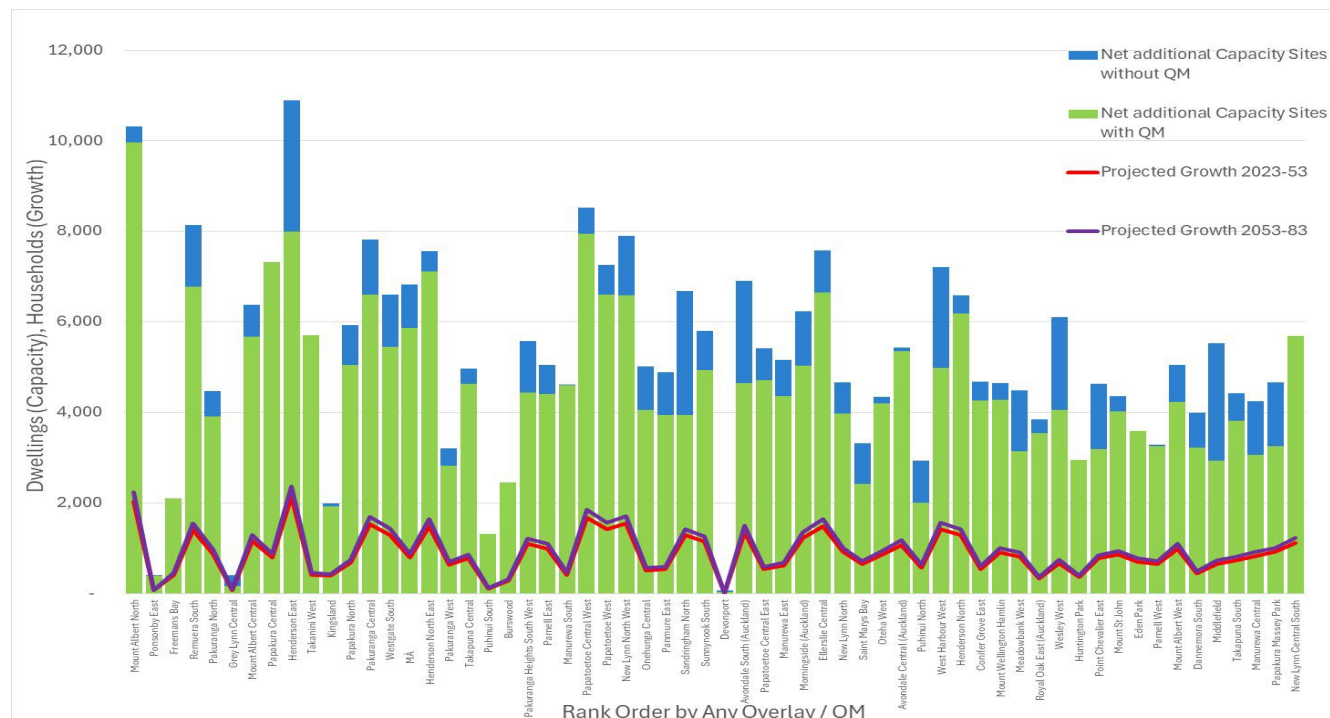
3.2.5 Overall effects of WC and Policy 3(d) Areas where QMs apply

The plan-enablement, capacity, and demand patterns in WC and Policy 3(d) areas across Auckland is shown in Table 3-5. This draws together the principal elements of PC120, showing location, the levels of enablement in relation to expected demand for housing, by location. The locations are ranked to show those markets with the highest incidence of QMs, and therefore those expected to show the largest impacts of QMs on housing enablement. The figure is supported by Figure 3-5 showing totals and the detail for the top 25 SA2 areas in terms of QM incidence.

Table 3-5 : Parameters of Locations in Walkable Catchments and Policy 3(d) Locations

Parameters of Any Overlay / QM													
	Any Overlay / QM Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-83	Projected Growth 2053-83 as % Capacity
Total Auckland 202 SA2s	50,772	193,072	456,357	310,091	766,448	2,004	1,412	592	73,577	128,393	17%	141,561	18%
Top 25 SA2s	14,799	26,852	121,288	14,567	135,855	2,119	1,522	597	10,399	23,037	17%	25,399	19%
Mount Albert North	880	1,420	9,966	346	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Ponsonby East	748	1,083	392	1	393	2,794	2,182	611	88	77	20%	85	22%
Freemans Bay	717	1,378	2,108	-	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Remuera South	686	1,430	6,785	1,356	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Pakuranga North	636	929	3,915	558	4,473	1,584	1,134	450	290	880	20%	970	22%
Grey Lynn Central	606	1,156	161	246	407	2,682	2,028	654	339	80	20%	88	22%
Mount Albert Central	606	1,207	5,681	696	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Papakura Central	604	1,259	7,331	-	7,331	1,532	969	563	482	799	11%	881	12%
Henderson East	603	1,462	7,992	2,907	10,899	1,234	910	325	857	2,145	20%	2,365	22%
Takanini West	601	805	5,704	-	5,704	1,214	787	428	448	418	7%	461	8%
Kingsland	593	961	1,929	60	1,989	1,765	1,392	373	276	391	20%	431	22%
Papakura North	583	1,133	5,044	883	5,927	1,092	725	366	620	681	11%	751	13%
Pakuranga Central	563	1,040	6,597	1,225	7,822	1,507	1,076	430	588	1,539	20%	1,697	22%
Westgate South	556	801	5,454	1,146	6,600	1,484	990	494	1,466	1,299	20%	1,432	22%
Māngere Central	553	847	5,863	964	6,827	1,201	931	269	346	798	12%	880	13%
Henderson North East	546	970	7,119	438	7,557	1,374	1,020	354	309	1,487	20%	1,640	22%
Pakuranga West	544	973	2,823	384	3,207	1,339	912	427	311	631	20%	696	22%
Takapuna Central	541	1,035	4,630	341	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Puhinui South	536	722	1,316	-	1,316	1,151	696	455	205	109	8%	120	9%
Burswood	534	532	2,462	-	2,462	1,211	796	416	33	287	12%	316	13%
Pakuranga Heights South West	532	1,083	4,437	1,141	5,578	1,322	992	330	243	1,098	20%	1,211	22%
Parnell East	528	1,530	4,414	636	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Manurewa South	508	771	4,600	16	4,616	1,149	796	353	384	414	9%	456	10%
Papatoetoe Central West	505	1,187	7,956	573	8,529	1,763	1,272	490	580	1,678	20%	1,850	22%
Papatoetoe West	490	1,138	6,609	650	7,259	1,328	941	387	462	1,428	20%	1,574	22%

Figure 3-4: Markets in WCs and Policy 3(d) Areas



3.2.6 Findings of High-Level Assessment

A number of findings arise:

1. The graph shows that plan-enabled capacity will be abundant throughout Auckland under PC120. The local market information supports the higher-level findings at the LBA level. Every SA2 market has substantial plan-enabled capacity.
2. The plan-enabled capacity is significantly higher than projected demand across all locations. This provides a considerable margin of sufficiency.
3. The abundant enablement in each local market means that the potential effects of any QM on the development capacity or the level of development in any market are very low. In particular, it shows that where a QM may have a potential effect on enablement, in practical terms there are many alternative sites on which development is able to occur in the same market.
4. This acts to minimise any effects from QMs on the provision of housing capacity. There is alternative capacity and it is in the same market, with the largest (only) potential effect being that development would occur on another site.
5. The net benefits of developing instead on that alternate site(s) may be positive, negative (costs) or neutral – there is no net difference in the housing development which occurs. The large number of sites – both with QMs and without QMs on which that development may occur – indicates plenty of opportunity.
6. Any effect on the timing of development is also expected to be little or no different because there are plenty of alternatives.
7. There is extensive capacity overall. In the 202 SA2 markets where there is a presence of at least one site subject to a QM, there is enablement for 766,448 additional dwellings on Residential zoned sites, including 456,357 dwellings on sites which are subject to at least one QM, as well as capacity for 310,091 dwellings on sites unaffected by any QM.
8. On average, there are 3,790 additional dwellings enabled in each SA2 market, around 4 times the existing level of development (in terms of dwelling numbers).
9. Across these markets, there is substantial housing development occurring. The table shows that in the period since the AUP was made operative in part, there have been on average 360 new dwellings consented in each market.
10. The expected demand from household growth also shows a substantial margin between plan-enabled capacity and future uptake. The table suggests that around 15% of plan-enabled capacity would be taken up in the 2023-53 period (the NPS-UD long term), and up to 36% in the very long term (2023-2083) on average.
11. That level of uptake suggests every SA2 market will have in the order of 66-70% of capacity which is enabled by PC120 that would be still unutilised 60 years from now.
12. To set that in context, by 2085 a significant share of the first wave of new dwellings constructed under PC120 provisions will themselves be ready for replacement, even as there would still be most of the capacity enabled by PC120 yet to be taken up.

More broadly, that indicates potential for a significant over-zoning effect on the Auckland housing market. That would arise because the large increase in the level of enablement from PC120 would not be matched by potential for additional growth in the market. Much or all of any potential value uplift at the whole market level would be limited to the increased enablement, but not catalysed by potential market activity to take-up the

opportunity at a level higher than the current growth pattern. Possible value uplift would not be expected to place downward pressure on prices, or imperative on existing property owners to implement change.

The main effect in this regard will be on the distribution of property values within the market, as distinct from any overall uplift in values, or downward pressure. One important reason for this is the abundance of opportunity throughout the market. Many sites will have increased potential to be intensified, but in net terms that can be expected to be offset by reduced likelihood of development because of the competing opportunity on other sites.

It is also important that much of the increase in development capacity is in medium-rise and high-rise apartment typologies. Although the initial land cost per dwelling is generally less for apartments than for terrace house developments, the most recent data on new dwelling values indicates there is little difference in mean land values between apartment and terrace dwellings of any given size.

These findings for the effects of QMs overall are important, because they put the plan-enablement alongside the estimated levels of demand, and illustrate the likely effects of QMs to show the low level of impacts from “limiting development capacity”.

3.3 Effects of Overlay and QM Provisions

It is important to consider the effects of Overlays and QMs in some detail, because they have different effects and geographies, and their impacts will vary. It is also important to examine these in combination, since sites may be affected by more than one overlay.

There are two steps to assessing the effects of Overlays and QMs. First is the high-level assessment for Auckland as a whole, to place each Overlay and particularly QM effects in the broad context.

A key finding is that at the Auckland level, the large amount of plan-enabled capacity means that any effects on development capacity from the Overlays, and as QMs in WC or Policy 3(d) areas is likely to be minimal to very small because of the opportunity to offset any limits on potential capacity on other sites in the same markets, and because there is substantial enablement in any case on sites which are subject to Overlays and QMs. The occurrence of overlays does not mean only sites unaffected by overlays and QMs have potential for further development and intensification.

The second part of the assessment is to consider implications on an area-specific basis, to identify whether the high-level conclusions can also be supported at the local market (SA2) level. Each of the overlays has been examined, to identify their implications at the local area level, with the analysis summarised in Attachment A.

3.3.1 Overlays and QMs

The potential effects of overlays and QMs is a key part of this s32 assessment, including because of their potential to affect the nature and location of housing enablement, and the patterns of housing development per se expected in the future.

The incidence of overlays as QMs inside the WC areas and Policy 3(d) area is important, since Clause 8(2)(b) and (c) do not apply to overlay provisions in other locations. A large number of the sites which are subject to one or more overlays are outside the WC areas and Policy 3(d) area, and are not subject to the impact assessment requirements under 8(2) or 8(4). It means that many of the sites with overlay provisions are not covered, and the potential impacts of QMs themselves are small.

For the assessment, all sites subject to overlays were identified, with QMs inside WC areas or Policy 3 (d) areas examined separately. Sites were identified as having overlay provisions and being inside WC or Policy 3(d) areas. The data from the capacity modelling showed the incidence of QM-provisions as listed in [Table 3-6](#).

Table 3-6 : Overlays and QMs Identified for Capacity Modelling

QUALIFYING MATTERS	Status
IIPC_OutstandingNaturalFeaturesOverlay	Yes (existing QM)
IIPC_OutstandingNaturalCharacterOverlay	Not a QM in AHPI
IIPC_HighNaturalCharacterOverlay	Not a QM in AHPI
IIPC_NationalGridCorridorOverlay	Yes (existing QM)
IIPC_AirspaceRestrictionDesignations	Yes (existing QM)
IIPC_AucklandMuseumViewshaftContoursOverlay	Yes (existing QM)
IIPC_SignificantEcologicalAreas	Yes (existing QM)
IIPC_WaitakereRangesHeritageAreaOverlay	Yes (existing QM)
IIPC_OutstandingNaturalLandscapeOverlay	Yes (existing QM)
IIPC_NotableTreesOverlay	Yes (other QM)
IIPC_CityCentrePortNoiseOverlay	Yes (existing QM)
IIPC_SitesAndPlacesOfSignificanceToManaWhenuaOverlay	Yes (existing QM)
IIPC_LocalPublicViewsOverlay	Yes (other QM)
IIPC_RidgelineProtectionOverlay	Not a QM in AHPI
IIPC_SpecialCharacterOverlay	Yes (other QM)
IIPC_HistoricExtentOfPlaceOverlay	Yes (existing QM)
IIPC_CombinedWastewaterNetworkControl	Yes (new QM)
IIPC_NotableGroupofTrees	Yes (other QM)
IIPC_EmergencyManagementAreaControl	Yes (existing QM)
IIPC_HistoricHeritagePlaceOverlay	Yes (existing QM)
AucklandMuseumVS	Yes (existing QM)
StockadeHill8m	Yes (other QM)
LocalPublicViews	Yes (other QM *)
LocallySignificantVVS	Yes (existing QM)
RegionallySignificantVVS	Yes (existing QM *)
RidgelineProtection	Not a QM in AHPI
RegionallySignificantVVS	Yes (existing QM)
ManukauCentreSunlightAdmission	Not a QM in AHPI

* Modification possible

[Table 3-7](#) provides a summary of the incidence and potential impacts of Overlays and QMs. The table shows:

- the numbers of Residential zoned and Business zoned sites to which each overlay/QM applies
- the plan-enabled capacity on those sites
- the plan-enabled capacity on those sites where the Overlay is a QM because the site is in a WC or Policy 3(d) area
- the total plan-enabled capacity on those sites as an Overlay
- the plan-enabled capacity which is in a QM, expressed as a share of Auckland's total plan enabled capacity.

It is important to understand that the modelled outputs show the plan enabled capacity with all of the overlays in place, for both the Baseline and the PC120 outputs. This means the estimates have allowed for any effects of the overlays, and any limits on development capacity in the context of Clause 8(2)(b) and (c), and 8(4)(a), (b) and (c) have already been applied in the modelling.

That means the estimates of plan-enabled capacity are net of the effects or impacts of the Overlay, and QM if relevant.

The capacity modelling outputs show the remaining capacity which is plan-enabled. That allows the assessment to consider the effects of PC120 in terms of what capacity is enabled, and the housing development which may occur. Those outcomes may be assessed in relation to Policy 3, the objectives of the NPS-UD, and more widely the WFUE and benefits of urban development.

There is not opportunity from the modelling to examine the specific effects of any limit or reduction in development capacity *per se*, or to compare the outcomes of a different level of development capacity with what PC120 enables.

However, there is a large amount of plan-enabled capacity with all the overlays in place, relative to projected demand for additional dwellings. It is therefore unlikely that a limitation in development capacity arising from an overlay at a site level would be material at a site level or locality level.

Table 3-7 provides information in relation to each overlay. Table 3-8 shows the share of plan-enabled capacity for Overlays overall, and for QMs. The largest Overlay in terms of numbers of sites affected is the Airspace Restriction designation affecting more than half of Auckland's plan-enabled capacity under PC120, with the Height Variation Control potentially affecting one quarter of the total. The Regionally Significant Viewshafts apply to 9% of total capacity ahead of Significant Ecological Areas (3.2%). Where these overlays apply as QMs, the largest potential impacts are the Airspace Restriction Designation (30%) ahead of Height Variation Control (24%) and Regionally Significant Viewshafts (5.2%).

Table 3-7 : Overlays and QM Incidence PC120

Overlay / QM	Sites Affected as Overlay			Sites Affected as a QM			Plan-enabled Capacity on QM Sites			Plan-enabled Capacity all Sites		
	Resi- dential	Business	Total	Resi- dential	Business	Total	Resi- dential	Business	Total	Resi- dential	Business	Total
Auckland Museum Viewshaft	221	172	393	221	172	393	2,333	4,216	6,549	2,333	4,216	6,549
Height Variation Overlay	23,931	8,539	32,470	21,722	6,902	28,624	271,230	231,324	502,554	292,007	268,722	560,729
Locally Significant Viewshaft	1,687	99	1,786	422	63	485	5,984	2,656	8,640	11,573	2,911	14,484
Local Public Views	-	-	-	-	-	-	-	-	-	-	-	-
Manukau Centre Sunlight Admission	-	5	5	-	5	5	-	65	65	-	65	65
Regionally Significant Viewshaft	26,528	2,600	29,128	5,724	2,080	7,804	52,014	56,421	108,435	127,272	59,493	186,765
Regionally Significant Viewshaft HSA	4,962	399	5,361	607	114	721	452	539	991	5,548	1,323	6,871
Ridgeline Protection	1,559	21	1,580	-	-	-	-	-	-	1,243	178	1,421
Stockade Hill	20	-	20	9	-	9	27	-	27	59	-	59
Airspace Restriction Designation	212,478	13,620	226,098	35,312	6,471	41,783	327,688	294,020	621,708	868,173	338,240	1,206,413
Historic Heritage EOP Overlay	4,506	854	5,360	1,493	534	2,027	14,525	29,148	43,673	27,081	37,455	64,536
Historic Heritage Place Overlay	56	4	60	21	2	23	12	58	70	1,012	117	1,129
Local Public Views Overlay	1	6	7	1	6	7	116	71	187	116	71	187
National Grid Corridor Overlay	4,677	660	5,337	617	213	830	8,986	24,130	33,116	31,307	31,658	62,965
Notable Group of Trees	350	26	376	27	10	37	732	2,457	3,189	3,100	3,898	6,998
Notable Trees Overlay	1,862	216	2,078	500	101	601	11,583	12,425	24,008	21,198	17,724	38,922
Outstanding Natural Features Overlay	2,213	160	2,373	383	58	441	2,637	4,371	7,008	8,009	4,544	12,553
Outstanding Natural Landscape Overlay	1,061	3	1,064	-	-	-	-	-	-	2,652	11	2,663
Significant Ecological Areas Overlay	14,775	290	15,065	635	106	741	4,066	28,652	32,718	35,777	31,228	67,005
Sites & Places of Significance to ManaWhenua	599	78	677	116	15	131	1,412	1,276	2,688	3,029	1,276	4,305
Special Character Overlay	16,047	1,325	17,372	6,015	1,044	7,059	6,976	12,606	19,582	14,991	16,765	31,756
Waitakere Ranges Heritage Area Overlay	5,692	30	5,722	73	-	73	374	-	374	2,206	516	2,722
Coastal Environment	3,440	236	3,676	3,240	234	3,474	14,749	6,616	21,365	15,613	6,648	22,261
Cohesive Zoning Response	1,084	29	1,113	1,079	29	1,108	3,263	423	3,686	3,277	423	3,700
Combined Wastewater Network Control	14,574	457	15,031	5,065	299	5,364	25,585	6,869	32,454	57,481	8,363	65,844
Comprehensive Integrated Planning Overlay	13,468	356	13,824	126	73	199	5,051	36,405	41,456	49,856	53,244	103,100
Lakeside Setback	274	3	277	196	2	198	1,558	244	1,802	1,753	250	2,003
Strategic Transport Corridor	3,276	1,412	4,688	1,133	690	1,823	21,262	67,360	88,622	35,736	85,792	121,528

Table 3-8 : Overlays and QM Incidence as Share of Plan Enabled Capacity PC120

Overlay / QM	Capacity on Overlay Sites as Share of Auckland Total			Capacity on QM Sites as Share of Auckland Total		
	Residential	Business	Total	Residential	Business	Total
Auckland Museum Viewshaft	0.2%	0.7%	0.3%	0.2%	0.7%	0.3%
Height Variation Overlay	19.6%	46.2%	27.1%	18.2%	39.8%	24.3%
Locally Significant Viewshaft	0.8%	0.5%	0.7%	0.4%	0.5%	0.4%
Local Public Views	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Manukau Centre Sunlight Admission	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Regionally Significant Viewshaft	8.6%	10.2%	9.0%	3.5%	9.7%	5.2%
Regionally Significant Viewshaft HSA	0.4%	0.2%	0.3%	0.0%	0.1%	0.0%
Ridgeline Protection	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
Stockade Hill	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Airspace Restriction Designation	58.4%	58.1%	58.3%	22.0%	50.5%	30.0%
Historic Heritage EOP Overlay	1.8%	6.4%	3.1%	1.0%	5.0%	2.1%
Historic Heritage Place Overlay	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
Local Public Views Overlay	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
National Grid Corridor Overlay	2.1%	5.4%	3.0%	0.6%	4.1%	1.6%
Notable Group of Trees	0.2%	0.7%	0.3%	0.0%	0.4%	0.2%
Notable Trees Overlay	1.4%	3.0%	1.9%	0.8%	2.1%	1.2%
Outstanding Natural Features Overlay	0.5%	0.8%	0.6%	0.2%	0.8%	0.3%
Outstanding Natural Landscape Overlay	0.2%	0.0%	0.1%	0.0%	0.0%	0.0%
Significant Ecological Areas Overlay	2.4%	5.4%	3.2%	0.3%	4.9%	1.6%
Sites & Places of Significance to ManaWhenua O	0.2%	0.2%	0.2%	0.1%	0.2%	0.1%
Special Character Overlay	1.0%	2.9%	1.5%	0.5%	2.2%	0.9%
Waitakere Ranges Heritage Area Overlay	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%
Coastal Environment	1.0%	1.1%	1.1%	1.0%	1.1%	1.0%
Cohesive Zoning Response	0.2%	0.1%	0.2%	0.2%	0.1%	0.2%
Combined Wastewater Network Control	3.9%	1.4%	3.2%	1.7%	1.2%	1.6%
Comprehensive Integrated Planning Outcome	3.4%	9.2%	5.0%	0.3%	6.3%	2.0%
Lakeside Setback	0.1%	0.0%	0.1%	0.1%	0.0%	0.1%
Strategic Transport Corridor	2.4%	14.7%	5.9%	1.4%	11.6%	4.3%

As noted, these figures relate to the estimated plan-enabled capacity with these Overlays already in place, such that the effects in terms of development capacity (relative to clause 8(2) and (4) has already been taken into account. The tables do not show the potential effects of the Overlays and QMs on plan-enabled capacity, they instead show the capacity which is still plan-enabled after the potential effects of Overlays and QMs have already been allowed for. To illustrate, on the 41,783 sites where the Airspace Restriction Designation is indicated as potentially affecting capacity as a QM, there is plan-enabled capacity for another 621,708 dwellings to establish on those sites. The figures do not indicate the extent to which plan-enabled capacity has been reduced by the QM.

3.4 Effects of Limiting Development Capacity

The provisions relating to the effects of QMs are set out above (1.4.3. Impacts of Qualifying Matters) where QMs may modify the requirements of Clause 4(1)(b) or (c) or policy 3 to the extent necessary to accommodate 1 or more QMs that are present, and whether the level of development is incompatible or higher density is inappropriate in an area. An evaluation report (under s32) must in relation to a QM set out why Council considers an area is subject to a qualifying matter and why the level of development is *“incompatible with clause 4(1)(b) or (c) or Policy 3”* or *“higher density is inappropriate in an area.”*

Under Schedule 3 Clause 8 (2)(b) It must “*assess the impact of limiting development capacity*” and under 2(c) must “*assess the costs and broader impacts*”.

There is no equivalent wording in Clause 8(4) in relation to assessing impacts of QMs. Clause 4(a) sets out the requirement to identify the characteristic that makes the level of development inappropriate in an area, and in 4(b) 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 (c) include a site-specific analysis identifying the site and 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.

The key term is “justify” implying a direct comparison of the net benefits of enabling the level of housing development, and those of applying the QM on a site or geographic area. The wider evaluation framework is again set in 4(b) by the “*national significance of urban development and the objectives of the NPS-UD.*”

Both Clause 8(2) and Clause 8(4) apply direct comparison of alternative outcomes, where Council must “*demonstrate why*” at 8(2)(a) and “*justify why*” at 8(4)(b) the benefits of the QM are greater than the benefits of the maximum level of housing enablement.

These matters are picked up below, in regard to the net benefits of QMs compared with the net benefits of housing development.

To assess the impact of QMs limiting development capacity it is important to first identify the gross potential impact of each QM, and to then adjust the analysis to allow for the proportion of that impact which can be expected to arise by 2053. It is also important to consider what share of potential impacts might be offset through development instead on other sites in the same market. This approach does not assume that the other 82-84% of the potential impacts will not arise at all. It instead allows for that demand and those impacts to arise after 2053, and to be generally in line with household growth and the provision of additional housing to accommodate it.

The evaluation of QMs does specifically include “*the impact that limiting development capacity*” and assessing “*the costs and broader impacts of imposing those limits.*”

There are two main potential impacts of limiting development capacity. One is that the housing development would not occur at all, and that amount of development and its associated costs and benefits would be lost to the Auckland economy.

The other is that the housing development would instead occur elsewhere in the Auckland economy, and the effects would arise from any differences in the geographic development pattern, together with net differences in the costs and benefits mix of the dwelling(s) provided, and from differences in timing where limiting capacity might see development on alternative sites occur later (or earlier) than would have occurred on the affected site.

On the basis that limiting development capacity through PC120 would be signalled immediately on the implementation of the replacement plan change, the need to use an alternate site would be known at the same time.

An important issue then is the scale and distribution of alternative capacity. This assessment places considerable emphasis on the level of enablement on other sites within the same market (SA2) to show whether a different geographic pattern or dwelling mix is likely to ensue from the adoption of one or more QMs. At the same time,

the loss of potential gains to landowners from enabling additional capacity and seeing a consequent increase in property value from the possible intensification would be broadly offset by gains to other landowners on to whose sites the development was instead directed. Where there is sufficient alternate capacity in the same market and time frame, the net costs would be very low, and would be discounted according to the time at which the alternate dwelling development occurred.

This is further influenced by the geographic extent of the locations subject to the Clause 8(2), 8(4) and 8(5) provisions, because the QM-related assessments are limited to those places inside WC areas and Policy 3d areas.

3.5 Implications for Urban Growth

This high level of capacity relative to demand has important implications for the potential growth in Auckland's urban economy. First, the abundant development opportunity throughout all locations can be expected to see the market generally able to pursue location and dwelling typology preferences, including in relation to employment opportunity. That can be expected to support the business sector in pursuing location choices in the knowledge of generally good accessibility to the labour force. The HBA Business study (2023) established that Auckland has sufficient capacity to enable business to develop capacity in its preferred locations. This combination suggests a relatively efficient growth path and urban form outcome for the business sector generally, assuming that there is appropriate infrastructure support (notably three waters and transport).

That said, the underlying assumption is that the very high level of enablement under PC120 will not have an unanticipated adverse effect on the land and housing market. That could arise from effectively over-zoning the residential zoned areas by providing for much more capacity than is likely to be taken up in the long term and very long term. One possible consequence is that land values may initially increase in response to the increase in plan-enabled capacity, with values increasing to reflect the potential returns from more intensive use. However, total demand would continue to be driven by underlying growth in the economy, which is likely to see shifts within the market as some locations would see higher land and property values, while other locations would see a relative drop in values because there is reduced potential to intensify, and/or the time before market growth will sustain intensification is further into the future. The overall market is likely to see increased differentiation in values to reflect the greater potential in some locations, especially central Auckland, and with corresponding relative decrease in other locations.

Increased potential to intensify does not necessarily translate to values which reflect the maximum potential on a site. Part of the reason for this is the limited preference for apartment living observed in the city, due in part to consumer preferences for terrace and town-house dwelling typologies rather than apartments, the generally higher cost per m² of floorspace in apartments, the similarity in land values per dwelling between terrace houses and apartments, and the generally smaller building project size for terrace houses making them often a more attractive proposition than apartments for a building sector characterised by small-medium firms with limited financial resources. These factors are evident in Auckland and other markets, and cited as a main reason for the high share of new dwellings as terrace and town houses rather than apartments, over the period since the AUP became operative in 2016.

A further obvious factor is the large difference between capacity and demand, with the long average time before development becomes feasible meaning that the development market is likely to be more differentiated among locations, as distinct from a development uplift across all locations.

As noted, new housing development occurs throughout Auckland, and is characterised by a wide variety of new dwelling sizes and typologies, and occurring across multiple locations with varying land values, with the resulting

mix of new dwelling prices servicing multiple segments with a mix of abilities to pay. Accordingly, in an efficient market, the values and price expectations would be driven more by the actual potential than the theoretical potential, including adjustment by the market to recognise that an increase in zoned capacity would be tempered by recognition that higher potential values are unlikely to accrue ahead of demand, which on average is some decades into the future. That is the common situation in urban markets, where values generally take account of demand for the existing dwelling estate as a resource to own and reside in, as well as any future potential for intensification, acknowledging the time lag before such potential becomes feasible.

One possible downside is that if land price expectations are set by the plan-enabled potential rather than the actual development potential of the land, then those higher values are likely to mitigate against housing development which is more in line with market demands. The obvious tension is between land with plan-enabled potential for apartment development but low prospect of that occurring in the medium-long term, compared with its short-medium term market potential for terrace house development at a correspondingly lower land market value. That could act to increase the price of terrace house developments to reflect their use of land with potential for apartments, and act to slow the provision of new development at lower than high-rise. The extent and effect of an imbalance between plan-enabled values and market-led values is not clear at this stage¹⁶.

There is some potential downside also in the quality of the living environment which might arise from the much more intensive development to be enabled in some areas of inner Auckland where meeting capacity targets may depend on reductions in urban amenity, including reduced setbacks and HIRB requirements for high rise development above 6 storeys¹⁷. The extent of these effects is not quantified at this stage, and it will depend on the numbers of people living in the more intensive areas and differences in the level of amenity from other locations.

¹⁶ There was a similar effect in Auckland in the 2003-2008 period, when high consumer confidence saw housing prices increase, and become reflected in high land values (which accounted for 80% of the uplift between re-valuations). That put pressure on new builds to be sufficiently high value to cover the high land value, which in Auckland's single house zones meant only larger and higher value new dwellings were viable – to justify the land purchase – and there was a major down turn in the numbers of smaller and medium sized (and valued) houses entering the market. The downturn in new consents over the 2005 to 2008 period masked a much bigger downturn in consents for smaller dwellings.

¹⁷ the CBA prepared to assess the MDRS provisions in 2022 identified substantial environmental and social costs from the modelled intensification. The overall positive BCR from that research depended on the assumption that the MDRS provisions would generate much higher growth for Auckland than would otherwise be the case, with the consequent uplift in agglomeration benefits from the population growth able to offset the environmental, social and congestion downsides.

4 Findings

4.1 Limitations

These conclusions are necessarily based on part-assessment, with the final AHPI provisions and the scope to be determined. Moreover, aspects of the analysis are not yet undertaken, and await the final modelling results. That said, a number of the core aspects of the final AHPI and its capacity are in place, and that provides sufficient base for a robust - if not final - s32 economic assessment.

These conclusions are provisional on that basis.

4.2 Costs and Benefits Comparison

The final part of the s32 assessment is consideration of the benefits and costs.

In relation to benefits overall, PC120 can be expected to generally deliver net benefits to the Auckland economy and community, from enabling housing development in generally appropriate locations. That is on the basis that the benefits of the Overlays in the AUP are generally oriented to achieving improved amenity in the Auckland urban environment, which is generally to the benefits of the Auckland community. Such amenity arises from the combination of achieving generally positive outcomes (benefits) and avoiding generally negative outcomes (costs). These benefits and costs are not monetised in most instances, because of the challenges in establishing robust and accepted values in dollar terms.

The quantification of benefits and costs is generally based on the parameters of the community and economy, in terms of numbers of people and households affected, the extent of areas affected, and for some aspects the numbers of businesses and size of the workforce affected. This is commonly on the basis that many intangible or less tangible benefits and costs accrue on a per capita basis – simply, the more people directly and indirectly affected, the greater the benefits of amenity or other positive outcomes achieved, or the greater the costs or negative effects of poor outcomes not avoided. These matters are generally referenced in the assessments of the specific Overlays.

One very important consideration is that enabling and providing for housing is seen as a providing benefit or benefits, with the purpose of the legislation to enable additional housing. There are two main possible outcomes from PC120, both of which involve additional housing enablement and housing per se. this means comparison of the outcomes is a comparison of two possibly different levels of benefit. On that basis, although the focus in Clause 8(2)(b) is on any lesser level of housing development enabled, the outcomes to be assessed under 8(2)(c) relate to any effects of a generally beneficial outcome, housing provision.

The dynamics of the Auckland market into the very long term, where the level of enablement in all locations will considerably greater than the level of demand, means there is very limited scope for loss of potential benefits from housing to arise. On the basis of those market dynamics, and the nature of the effects of housing enablement and development, we conclude there are very low potential costs of achieving the purpose and benefits of the Overlays. This underpins the conclusion that there will be considerable net benefit to the Auckland community and economy from PC120, and very low potential for net disbenefits.

4.2.1 QM Effects - Low costs of foregone benefits of enablement

The effects of the QMs are on the level of development enabled in particular locations. Some of that effect may arise immediately or quickly. This is mainly in terms of the development potential of affected sites, and any flow-on implications for the value of those sites.

However, the very large scale of enabled capacity means much of the effect would arise only when a lesser level of development comes into effect, if housing development would not occur when it would otherwise have occurred. Relevant here is the amount of enablement and the range of opportunities for that development to occur in an equivalent location, compared with the scale of growth in Auckland – as the key indicators of whether such housing development would occur, and if so when it would occur.

The level of enablement is many times greater than the projected demand into the long term. This means that QMs' effects on housing development will be on average very low. To be realised, such effects would depend on housing development not occurring on QM-affected sites and also on there not being alternative sites where development could occur instead. Because there is abundant plan-enabled and currently feasible capacity, and because development of more sites will become feasible over time, then there is little prospect of the QMs affecting the level of development for housing at the Auckland-wide level. The potential for QM limitations to come into effect is generally very small and is likely to occur well into the future.

The scale and the timing mean that effects – costs as foregone benefits of enablement – are very low in present value terms.

4.2.2 Higher Costs of Foregone QM Benefits

The costs in terms of foregone benefits of community values addressed by QMs would be greater than the costs of foregone enablement, for several reasons.

First, the costs of foregone benefits from housing enablement are very low, overall and in present value terms.

Second, the costs of lost community values would be substantial. While not monetised or directly quantified, the fact that these benefits are part of a settled Plan provisions, through a process of community consultation and in some cases over many planning cycles through the years, shows that such benefits are generally seen as of value by a community of 1.8 million persons. A number of the values have been confirmed through the planning process, to Council, Environment Court and higher court levels, and including specific comparison of the benefits of housing enablement against environmental outcomes. Even if the average ascribed value per person were small, in aggregate the values of a very large community are significant.

It is also important to take account the nature of the Schedule 3C and Policy 3(d) provisions, in relation to the structures and timings of decision processes. The Schedule 3C provisions confer enablement. They provide for what could occur, depending on the wishes of property owners, in the context of the market conditions. That potential could be implemented early, it could occur later, it may not occur for many decades. Future changes could see that potential extended or changed. Importantly, the enablement in place at any one time does not foreclose future options.

In contrast, the QMs seek to prevent or limit the amount of change which could occur, in order to maintain values which would be lost if development did occur. This is because changes from development are almost always not reversible, and change can occur in only one direction. This means that if an ONL limitation is removed and re-development occurs, then the ONL values are lost or reduced. On the other hand, if the

disbenefits (costs) of ONL protection are determined at some later date to be no longer justified, then the benefits (costs avoided) are not lost, only delayed. Since there is a very large amount of enablement, then there is abundant scope for such delay to be not material.

Fourth, the costs of enabling in 2023 a lesser level of development – the foregone benefits of greater housing enablement – are likely to arise well into the future, and may not arise at all because of the very abundant opportunity to realise the same benefits within the urban economy, albeit with a different pattern of growth.

These matters mean there is higher likelihood that the costs from not implementing QMs will be incurred, and would occur earlier, than the costs of any lesser level of development than enabled under clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3.

This may not apply in all situations and locations. Hence the attention to where the effects of QMs would arise, and how those can be expected to manifest as lesser levels of development in locations throughout the region, as well as at the city-wide level. There is considerable focus on the suburb (SA2) level, as this geography is a reasonable indicator of both the incidence of effects and also the opportunity or demand to be transferred to alternatives with similar market conditions.

Importantly, the growth assessment indicates that in all locations - at SA2 level and for localities such as the inner suburbs – there is still a substantial margin between projected demand and plan-enabled (and currently feasible) capacity for housing.

This suggests that the QMs are not likely to manifest as lesser levels of development than would otherwise be the case. That conclusion is to be expected for most locations given the large margin between feasible capacity and demand across the city.

4.3 Summary

The assessment of potential QM effects shows:

- a. The costs of foregone benefits of full enablement are very low in present value terms.
- b. The likelihood of such costs arising is low, given the very large margin between enablement and demand, and the wide opportunity for housing development throughout Auckland.
- c. There is substantial opportunity in the future to avoid such costs, through amendments to the AUP.
- d. The costs from loss of benefits of values addressed by the QMs would be substantial, and greater than the costs of foregone enablement
- e. The likelihood of such costs arising is high, given their nature and likely irreversible nature of such effects.
- f. This also means little opportunity in the future to avoid such costs, through future AUP amendments.

The overall conclusion is that PC120 including QMs would provide for greater overall benefit for the Auckland community than would full application of the Schedule 3C and Policy 3 provisions in all locations.

4.3.1 Specific Findings

Specific findings are that:

- a. PC120 can be expected to deliver substantial benefit to Auckland generally, by enabling capacity in broadly efficient locations and providing opportunity for housing development to meet the preferences of the Auckland community.

- b. The enablement of housing capacity will generally support business growth, and growth in the economy at large, by providing for growth in the locations to support business activity through the distribution of demand, and of the labour force.
- c. The urban form outcomes are expected to be generally more efficient than would have been the case under PC78.
- d. The residential development enabled in the Walkable Catchments is expected to support Auckland's network of commercial centres, and deliver a relatively efficient pattern of housing including through the focus on more central areas of the city.
- e. The residential development enabled in the Policy 3(b) areas is likewise expected to support Auckland's network of commercial centres at all levels of the centres hierarchy, and help deliver a relatively efficient pattern of housing.
- f. QMs can be expected to deliver positive net benefit for the Auckland economy and community, because the costs of QMs by limiting development capacity will be very small. The benefits of QMs – the avoided costs of not protecting the benefits which QMs seek to preserve – will be substantially larger.
- g. Although those benefits of QMs are not quantified, the costs of protecting QM values by limiting development capacity are very small, especially in PV terms because any costs would not be incurred until many years into the future.
- h. These conclusions apply to all of the QMs examined, including Special Character, View Shafts, Height, Height Sensitive Areas and coastal areas.

4.3.2 Marginal Gains from Increasing Capacity Enabled

Of note, the assessment does not include review of any net additional costs (disbenefits) accruing to Auckland's living environment because of changes to height limits, HIRB, site coverage and other development provisions which have been required in order to meet the housing capacity requirement in Clause 4(1)(a).

There has not been assessment of the additional disbenefits for the living environment arising from enabling greater intensification in inner suburbs to achieve the target, for example if additional dis-benefits from that extra intensification can be expected to outweigh the small benefits from the marginal gains in capacity. That is especially because such additional development capacity is unlikely to be taken up for many years.

4.4 Caveat

These findings are interim. They are based on the second round of modelling of total and plan-enabled capacity undertaken in October 2025. There is ongoing assessment and changes in provisions, across many locations and sites in urban Auckland. As a consequence, changes are inevitable in the estimates of plan-enabled capacity, their scale, and geographic distribution, and in the likely urban form and living environment outcomes.

That said, the October 2025 capacity modelling results offer a reasonable basis on which to examine many aspects of PC120, and this s32 Report has been developed on that proviso.

J D M Fairgray

29 October 2025

A. ATTACHMENT – Parameters of Overlays and QMs

This Attachment contains details of all of the Overlays and QMs under PC120. It follows a standardised format for each Overlay, with a table of the key parameters in terms of numbers of sites, capacity on sites subject to QMs and the Overlay, total capacity in each market, and indicators of land and property values. The table also shows the projected growth for each SA2 location (2023-53 and 2053-83), taking account of plan-enabled capacity, location relative to the central city, and property values relative to the Auckland average.

The assessment of each Overlay is important, to show the possible effect of each on development capacity, and to identify the geographic distribution of the Overlay. In the tables and graphs, SA2 areas have been ranked according to the incidence of each Overlay as a QM. This is to show the highest potential effect on development capacity.

The analysis examines the Residential zoned areas only. That is because the data on Business zoned areas is not complete and in the same format as the Residential zoned sites, and it is difficult to meaningfully combine Residential-zoned and Business-zoned sites in a specific SA2 market, to show for example mean property CV and IV values.

4.4.1 Special Character

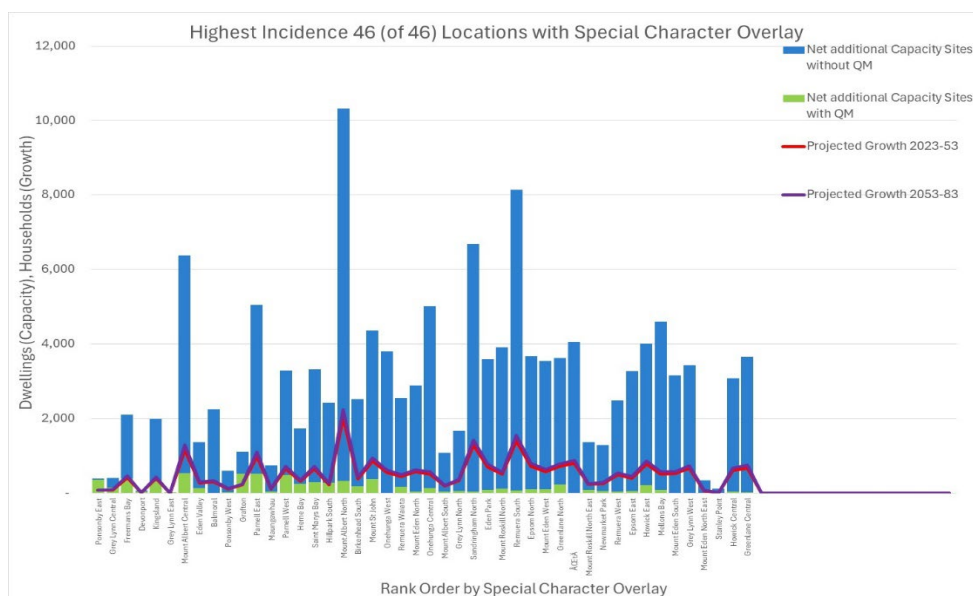
The **Special Character Area overlay** applies to 16,047 Residential zoned sites, and 1,325 Business zoned sites. Those sites have total plan-enabled capacity for 31,756 net additional dwellings, including for 14,991 net additional dwellings on Residential zoned sites, and 16,765 additional dwellings on Business zoned sites in WC and Policy 3(d) locations. For sites where the Special Character is a QM there is capacity for a net 19,582 additional dwellings able to be developed over and above any limitation on development arising from the QM. That represents 0.9% of Auckland's total plan-enabled capacity.

The analysis shows there is substantial plan-enabled capacity for 128,435 additional dwellings on Residential zoned sites in the same markets which are not affected by this Overlay, with capacity for 135,411 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for 38% of total regional household growth.

Table A-1 : Capacity and Site Parameters – Top 25 SA2s with High Incidence of Special Character

Parameters of Special Character Overlay													
	Special Character Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-83	Projected Growth 2053-83 as % Capacity
Total Auckland 46 SA2s	6,015	47,441	6,976	128,435	135,411	2,947	2,133	814	12,351	23,832	18%	26,276	19%
Top 25 SA2s	5,416	26,503	5,579	60,155	65,734	3,138	2,232	905	6,639	11,554	18%	12,737	19%
Ponsonby East	746	1,083	351	42	393	2,794	2,182	611	88	77	20%	85	22%
Grey Lynn Central	604	1,156	145	262	407	2,682	2,028	654	339	80	20%	88	22%
Freemans Bay	548	1,378	391	1,717	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Devonport	460	1,318	43	21	64	2,623	1,644	978	65	9	14%	10	16%
Kingsland	448	961	305	1,684	1,989	1,765	1,392	373	276	391	20%	431	22%
Grey Lynn East	216	275	9	-	9	1,809	1,434	375	633	2	22%	2	22%
Mount Albert Central	210	1,207	541	5,836	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Eden Valley	202	671	141	1,218	1,359	2,806	2,210	596	194	267	20%	294	22%
Balmoral	187	1,016	12	2,230	2,242	2,163	1,730	432	81	297	13%	327	15%
Ponsonby West	170	827	28	565	593	2,866	2,234	632	147	117	20%	129	22%
Grafton	160	528	518	591	1,109	4,034	2,694	1,340	109	218	20%	240	22%
Parnell East	159	1,530	513	4,537	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Maungawhau	158	966	34	708	742	2,468	1,945	523	83	110	15%	121	16%
Parnell West	149	1,137	480	2,802	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Herne Bay	126	1,357	251	1,483	1,734	6,264	4,300	1,965	202	318	18%	351	20%
Saint Marys Bay	125	891	289	3,035	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Hillpark South	101	1,057	272	2,155	2,427	1,271	836	435	273	228	9%	251	10%
Mount Albert North	99	1,420	322	9,990	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Birkenhead South	94	965	177	2,340	2,517	2,223	1,320	903	251	384	15%	423	17%
Mount St John	93	766	380	3,980	4,360	4,205	3,218	987	250	858	20%	946	22%
Onehunga West	78	1,249	9	3,797	3,806	1,972	1,510	461	280	564	15%	622	16%
Remuera Waiata	76	1,120	166	2,387	2,553	5,362	3,507	1,855	230	448	18%	494	19%
Mount Eden North	70	1,508	34	2,851	2,885	3,444	2,519	925	193	568	20%	626	22%
Onehunga Central	70	1,283	127	4,892	5,019	2,408	1,598	809	767	516	10%	569	11%
Mount Albert South	67	834	41	1,032	1,073	2,628	1,692	936	167	191	18%	211	20%

Figure A-1: P-E Capacity and Projected Growth – Top 60 Special Character



4.4.2 Auckland Museum Viewshafts

The **Auckland Museum Viewshafts overlay** applies to 221 Residential zoned sites, and 172 Business zoned sites. Those sites have total plan-enabled capacity for 6,549 net additional dwellings, all in WC and Policy 3(d) locations. That represents 0.3% of Auckland's total plan-enabled capacity.

The analysis shows there is substantial plan-enabled capacity for 5,999 additional dwellings on Residential zoned sites in the same markets which are not affected by this Overlay, with capacity for 8,332 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for 2% of total regional household growth.

Table A-2 : Capacity and Site Parameters – SA2s with High Incidence of Auckland Museum Viewshaft

Parameters of Auckland Museum Viewshaft													
	Auckland Museum Viewshaft Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 2 SA2s	221	2,667	2,333	5,999	8,332	5,778	3,941	1,838	996	1,640	20%	1,808	22%
Top 25 SA2s	221	2,667	2,333	5,999	8,332	5,778	3,941	1,838	996	1,640	20%	1,808	22%
Parnell East	113	1,530	1,377	3,673	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Parnell West	108	1,137	956	2,326	3,282	5,993	3,802	2,190	687	646	20%	712	22%

Figure A-2: P-E Capacity and Projected Growth – Top 2 Auckland Museum Viewshaft



4.4.3 Height Variation

The **Height Variation Control** applies to 23,931 Residential zoned sites, and 8,539 Business zoned sites, with total plan-enabled capacity for 292,007 (Residential) and 268,722 (Business) net additional dwellings respectively, or 560,729 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 271,230 (Residential) and 231,324 (Business) net additional dwellings respectively, or 502,554 in total. That represents 24.3% of Auckland's total plan-enabled capacity.

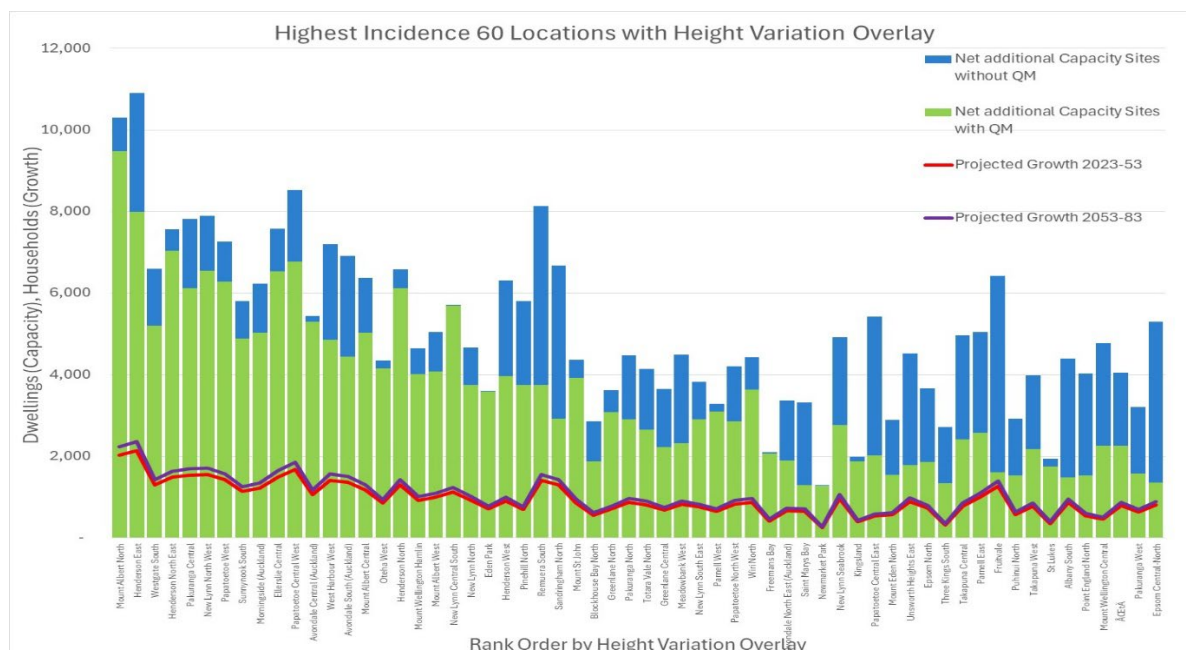
In the same markets where the incidence of Height Variation is greatest, there is plan-enabled capacity for another 367,342 additional dwellings on Residential zoned sites which are not affected by this control, with capacity for 639,202 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for nearly twice the total regional household growth.

Projected growth suggests 17% of the capacity in these markets could be taken up in the 2023-53 period. These markets accounted for 26% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-3 : Capacity and Site Parameters – SA2s with High Incidence of Height Variation Overlay

Parameters of Height Variation Overlay													
	Height Variation Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 168 SA2s	21,722	159,471	271,230	367,972	639,202	2,146	1,519	627	65,306	111,822	17%	123,293	19%
Top 25 SA2s	10,599	26,213	134,393	32,900	167,293	1,832	1,301	531	12,524	31,855	19%	35,121	21%
Mount Albert North	758	1,420	9,476	836	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Henderson East	598	1,462	7,987	2,912	10,899	1,234	910	325	857	2,145	20%	2,365	22%
Westgate South	545	801	5,209	1,391	6,600	1,484	990	494	1,466	1,299	20%	1,432	22%
Henderson North East	538	970	7,045	512	7,557	1,374	1,020	354	309	1,487	20%	1,640	22%
Pakuranga Central	508	1,040	6,126	1,696	7,822	1,507	1,076	430	588	1,539	20%	1,697	22%
New Lynn North West	483	1,141	6,554	1,349	7,903	1,401	834	567	461	1,555	20%	1,714	22%
Papatoetoe West	469	1,138	6,279	980	7,259	1,328	941	387	462	1,428	20%	1,574	22%
Sunnynook South	464	781	4,893	916	5,809	1,446	1,100	347	242	1,143	20%	1,260	22%
Morningside (Auckland)	448	1,279	5,037	1,196	6,233	2,040	1,521	519	356	1,227	20%	1,353	22%
Ellerslie Central	431	1,165	6,531	1,056	7,587	3,651	2,940	712	372	1,493	20%	1,646	22%
Papatoetoe Central West	413	1,187	6,772	1,757	8,529	1,763	1,272	490	580	1,678	20%	1,850	22%
Avondale Central (Auckland)	411	707	5,298	138	5,436	1,882	1,437	445	855	1,070	20%	1,180	22%
West Harbour West	407	1,421	4,856	2,349	7,205	1,132	848	284	499	1,418	20%	1,563	22%
Avondale South (Auckland)	406	1,483	4,446	2,464	6,910	1,465	1,061	403	778	1,360	20%	1,499	22%
Mount Albert Central	405	1,207	5,027	1,350	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Oteha West	404	679	4,155	190	4,345	1,915	1,041	874	714	855	20%	943	22%
Henderson North	403	725	6,119	462	6,581	1,580	1,156	424	510	1,295	20%	1,428	22%
Mount Wellington Hamlin	342	775	4,020	629	4,649	1,665	1,110	555	297	915	20%	1,009	22%
Mount Albert West	332	883	4,075	978	5,053	2,050	1,549	501	475	994	20%	1,096	22%
New Lynn Central South	329	1,225	5,692	5	5,697	2,992	1,676	1,316	632	1,121	20%	1,236	22%
New Lynn North	328	1,168	3,742	926	4,668	1,384	809	576	287	919	20%	1,013	22%
Eden Park	298	553	3,592	1	3,593	2,551	2,001	550	46	707	20%	780	22%
Henderson West	297	898	3,963	2,358	6,321	1,257	862	396	429	903	14%	996	16%
Pinehill North	294	675	3,744	2,063	5,807	1,945	1,099	846	364	697	12%	768	13%
Remuera South	288	1,430	3,755	4,386	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%

Figure A-3: P-E Capacity and Projected Growth – Height Variation Overlay



4.4.4 Locally Significant Viewshafts

The Locally Significant Viewshafts applies to 1,687 Residential zoned sites, and 99 Business zoned sites, with total plan-enabled capacity for 11,573 (Residential) and 2,911 (Business) net additional dwellings respectively, or 14,484 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 5,984 (Residential) and 2,656 (Business) net additional dwellings respectively, or 8,640 in total. That represents 0.4% of Auckland's total plan-enabled capacity.

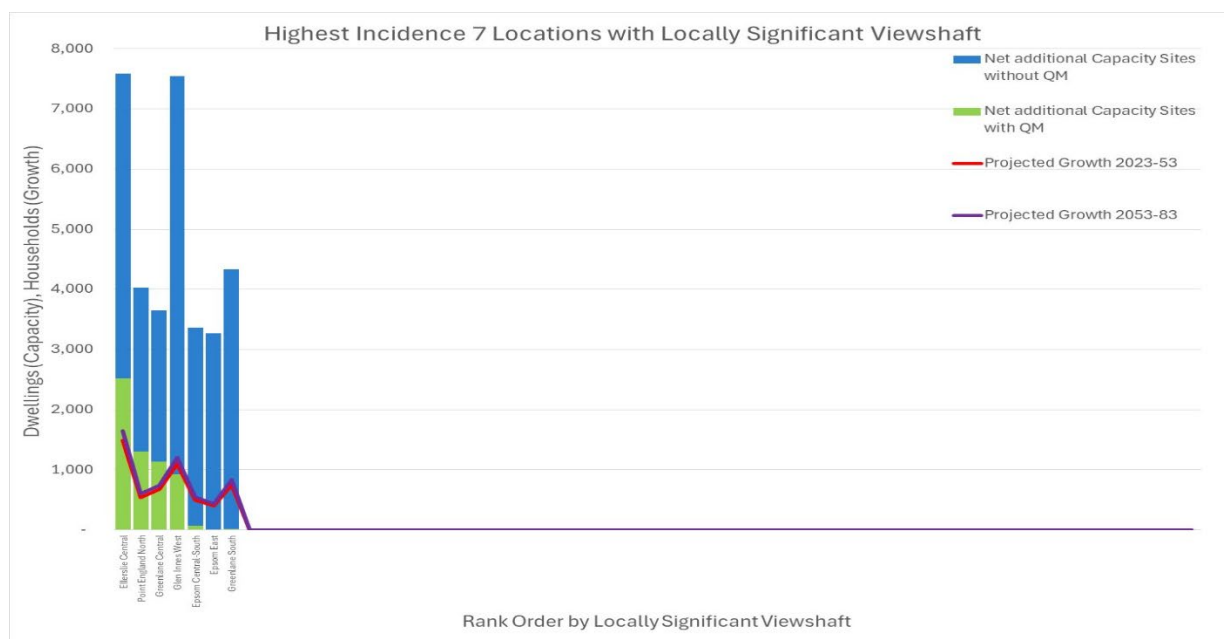
In the same markets where the incidence of Locally Significant Viewshafts is greatest, there is plan-enabled capacity for another 27,794 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 33,778 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 9% of total regional household growth.

Projected growth suggests 16% of the capacity in these markets could be taken up in the 2023-53 period. These markets accounted for 1.3% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-4 : Capacity and Site Parameters – SA2s with High Incidence of Locally Significant Viewshaft

Parameters of Locally Significant Viewshaft													
	Locally Significant Viewshaft Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 7 SA2s	422	7,661	5,984	27,794	33,778	2,805	2,150	656	3,188	5,461	16%	6,020	18%
Top 25 SA2s	422	7,661	5,984	27,794	33,778	2,805	2,150	656	3,188	5,461	16%	6,020	18%
Ellerslie Central	157	1,165	2,522	5,065	7,587	3,651	2,940	712	372	1,493	20%	1,646	22%
Point England North	116	858	1,309	2,722	4,031	1,316	1,001	315	327	544	13%	600	15%
Greenlane Central	97	756	1,140	2,509	3,649	2,915	2,256	658	138	675	18%	744	20%
Glen Innes West	39	1,408	929	6,617	7,546	2,373	1,839	534	1,010	1,096	15%	1,208	16%
Epsom Central-South	10	1,250	65	3,300	3,365	3,425	2,701	724	233	500	15%	551	16%
Epsom East	2	783	3	3,264	3,267	4,105	3,019	1,086	576	398	12%	439	13%
Greenlane South	1	1,441	16	4,317	4,333	2,425	1,716	709	532	755	17%	832	19%

Figure A-4: P-E Capacity and Projected Growth – Locally Significant Viewshaft



4.4.5 Regionally Significant Viewshafts

The Regionally Significant Viewshafts apply to 26,528 Residential zoned sites, and 2,600 Business zoned sites, with total plan-enabled capacity for 127,272 (Residential) and 59,493 (Business) net additional dwellings respectively, or 186,765 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 52,014 (Residential) and 56,421 (Business) net additional dwellings respectively, or 108,435 in total. That represents 5.2% of Auckland's total plan-enabled capacity.

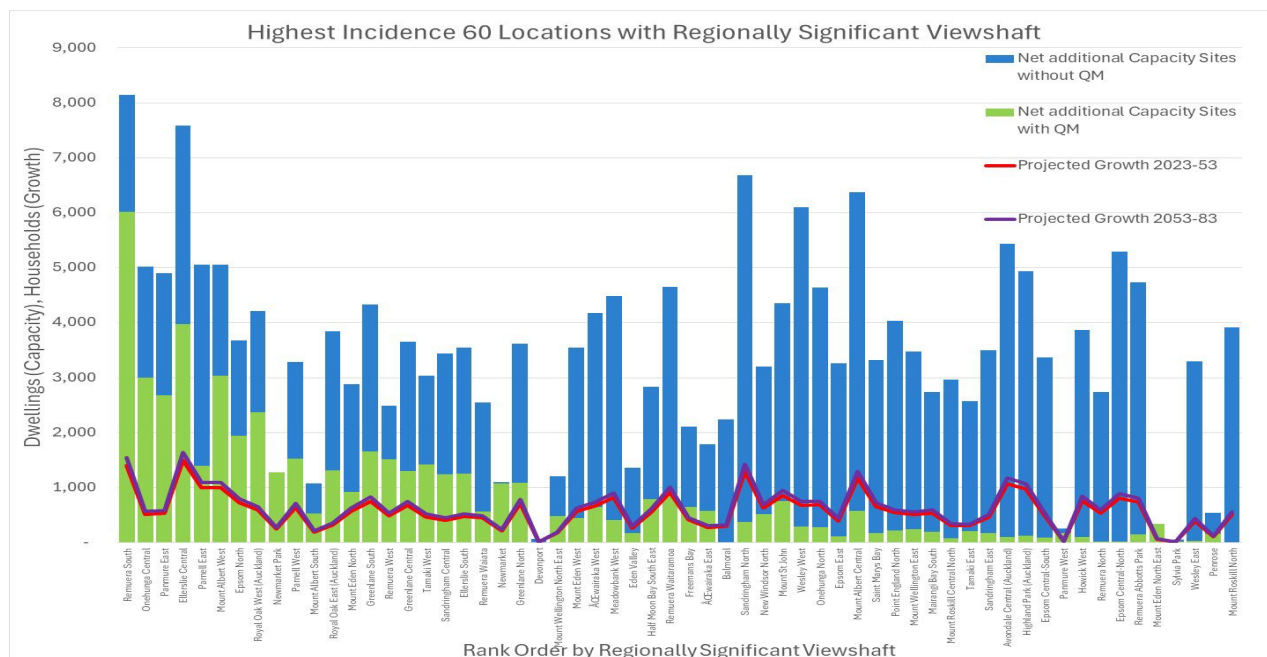
In the same markets where the incidence of Regionally Significant Viewshafts as QMs is greatest, there is plan-enabled capacity for another 166,437 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 218,451 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 60% of total regional household growth.

Projected growth suggests 17% of the capacity in these markets could be taken up in the 2023-53 period. These markets accounted for 8.4% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-5 : Capacity & Site Parameters – SA2s with High Incidence of Regionally Significant Viewshaft

Parameters of Regionally Significant Viewshaft													
	Regionally Significant Viewshaft Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 66 SA2s	5,724	62,094	52,014	166,437	218,451	2,821	2,060	761	21,179	36,160	17%	39,867	18%
Top 25 SA2s	4,672	25,547	42,068	46,518	88,586	3,253	2,332	921	8,163	14,645	17%	16,147	18%
Remuera South	533	1,430	6,014	2,127	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Onehunga Central	371	1,283	3,005	2,014	5,019	2,408	1,598	809	767	516	10%	569	11%
Panmure East	329	1,143	2,680	2,217	4,897	1,701	1,282	419	419	534	11%	589	12%
Ellerslie Central	282	1,165	3,980	3,607	7,587	3,651	2,940	712	372	1,493	20%	1,646	22%
Parnell East	281	1,530	1,402	3,648	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Mount Albert West	252	883	3,040	2,013	5,053	2,050	1,549	501	475	994	20%	1,096	22%
Epsom North	229	1,177	1,939	1,735	3,674	4,633	3,433	1,200	212	723	20%	797	22%
Royal Oak West (Auckland)	216	864	2,367	1,845	4,212	2,374	1,872	502	306	594	14%	655	16%
Parnell West	194	1,137	1,533	1,749	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Newmarket Park	194	598	1,282	-	1,282	5,506	3,102	2,404	318	252	20%	278	22%
Mount Albert South	173	834	529	544	1,073	2,628	1,692	936	167	191	18%	211	20%
Royal Oak East (Auckland)	153	1,042	1,310	2,534	3,844	2,948	2,270	678	342	327	9%	361	9%
Mount Eden North	151	1,508	925	1,960	2,885	3,444	2,519	925	193	568	20%	626	22%
Greenlane South	146	1,441	1,656	2,677	4,333	2,425	1,716	709	532	755	17%	832	19%
Greenlane Central	134	756	1,304	2,345	3,649	2,915	2,256	658	138	675	18%	744	20%
Remuera West	134	852	1,518	970	2,488	4,577	3,274	1,303	298	490	20%	540	22%
Tamaki West	130	844	1,417	1,622	3,039	1,388	1,121	267	245	470	15%	518	17%
Sandringham Central	123	852	1,245	2,201	3,446	2,099	1,622	477	144	409	12%	451	13%
Ellerslie South	110	995	1,249	2,296	3,545	2,600	1,860	740	280	477	13%	526	15%
Remuera Waiata	102	1,120	569	1,984	2,553	5,362	3,507	1,855	230	448	18%	494	19%
Newmarket	96	255	1,074	21	1,095	3,593	2,615	978	796	215	20%	237	22%
Greenlane North	92	679	1,089	2,529	3,618	3,625	2,819	806	186	712	20%	785	22%
Devonport	84	1,318	8	56	64	2,623	1,644	978	65	9	14%	10	16%
Mount Wellington North East	82	711	481	725	1,206	2,064	1,544	520	185	174	14%	192	16%
Mount Eden West	81	1,130	452	3,099	3,551	2,776	2,206	570	212	574	16%	633	18%

Figure A-5: P-E Capacity and Projected Growth – Regionally Significant Viewshaft



4.4.6 Regionally Significant Viewshafts HSAs

The Regionally Significant Viewshafts HSAs apply to 4,962 Residential zoned sites, and 399 Business zoned sites, with total plan-enabled capacity for 5,548 (Residential) and 1,323 (Business) net additional dwellings respectively, or 6,871 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 52,014 (Residential) and 56,421 (Business) net additional dwellings respectively, or 108,435 in total. That represents 5.2% of Auckland’s total plan-enabled capacity.

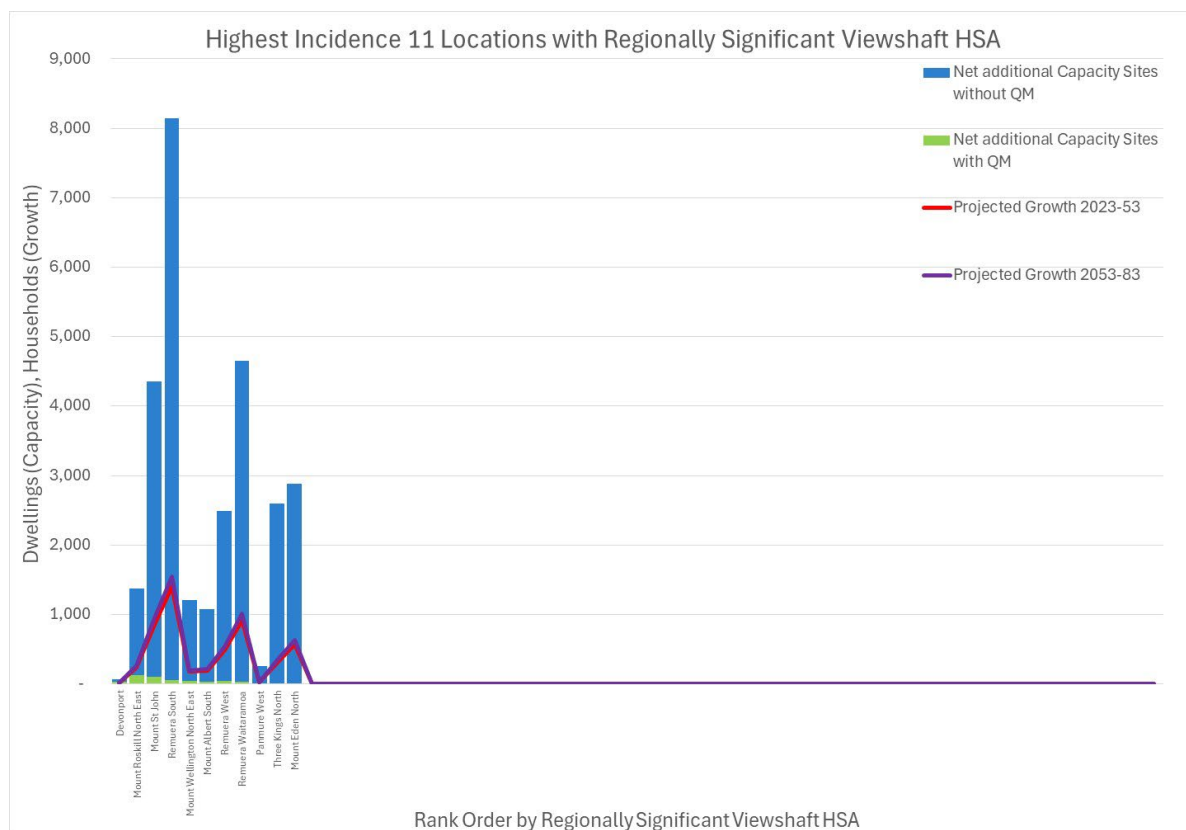
In the same markets where the incidence of Regionally Significant Viewshafts as QMs is greatest, there is plan-enabled capacity for another 166,437 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 218,451 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 60% of total regional household growth.

Projected growth suggests 17% of the capacity in these markets could be taken up in the 2023-53 period. These markets accounted for 8.4% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-6 : Capacity & Site Parameters – SA2s with High Incidence of Regionally Significant Viewshaft HSA

Parameters of Regionally Significant Viewshaft HSA													
	Regionally Significant Viewshaft HSA Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 11 SA2s	607	10,480	452	28,637	29,089	3,475	2,462	1,013	2,857	5,179	18%	5,710	20%
Top 11 SA2s	607	10,480	452	28,637	29,089	3,475	2,462	1,013	2,857	5,179	18%	5,710	20%
Devonport	292	1,318	29	35	64	2,623	1,644	978	65	9	14%	10	16%
Mount Roskill North East	79	740	122	1,247	1,369	1,210	968	242	131	234	17%	258	19%
Mount St John	74	766	104	4,256	4,360	4,205	3,218	987	250	858	20%	946	22%
Remuera South	58	1,430	57	8,084	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Mount Wellington North East	48	711	45	1,161	1,206	2,064	1,544	520	185	174	14%	192	16%
Mount Albert South	27	834	27	1,046	1,073	2,628	1,692	936	167	191	18%	211	20%
Remuera West	19	852	38	2,450	2,488	4,577	3,274	1,303	298	490	20%	540	22%
Remuera Waitaramoa	7	1,546	28	4,625	4,653	5,453	3,843	1,610	278	916	20%	1,010	22%
Three Kings North	1	701	1	2,593	2,594	2,886	2,007	879	490	311	12%	343	13%
Mount Eden North	1	1,508	1	2,884	2,885	3,444	2,519	925	193	568	20%	626	22%
Panmure West	1	74	-	256	256	3,301	2,264	1,037	515	23	9%	25	10%

Figure A-6: P-E Capacity and Projected Growth – Regionally Significant Viewshaft HSA



4.4.7 Stockade Hill Viewshaft

The Stockade Hill Viewshaft overlay applies to only 9 sites, and has a small potential effects on Auckland's housing enablement.

Table A-7 : Capacity & Site Parameters – SA2s with High Incidence of Stockade Hill

Parameters of Stockade Hill													
	Stockade Hill Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 2 SA2s	9	2,862	27	8,446	8,473	1,958	1,419	540	703	1,275	15%	1,406	17%
Top 2 SA2s	9	2,862	27	8,446	8,473	1,958	1,419	540	703	1,275	15%	1,406	17%
Mellons Bay	7	1,447	21	4,582	4,603	2,311	1,639	672	304	513	11%	566	12%
Howick West	2	1,415	6	3,864	3,870	1,590	1,188	402	399	762	20%	840	22%

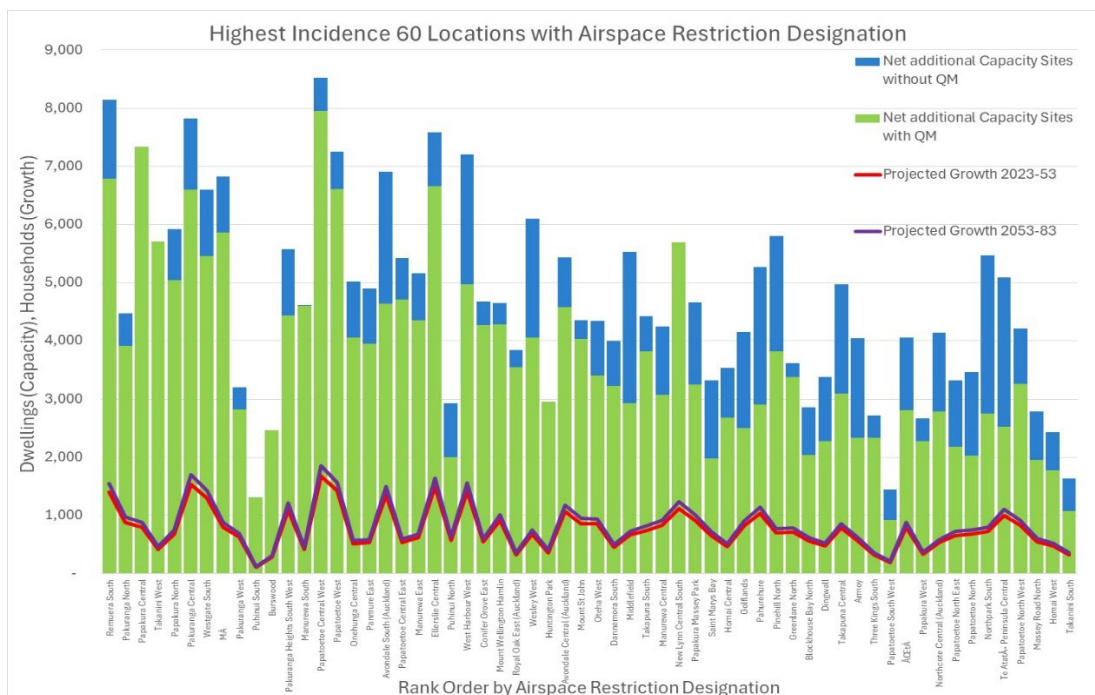
4.4.8 Airspace Restriction Designations

The Airspace Restriction Designation applies across substantial areas of Auckland, and relates to 212,478 Residential zoned sites, and 13,620 Business zoned sites, with total plan-enabled capacity for 868,173 (Residential) and 338,240 (Business) net additional dwellings respectively, 1,206,413 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 327,688 (Residential) and 294,020 (Business) net additional dwellings respectively, 621,708 in total. That represents 30% of Auckland's total plan-enabled capacity. This is a technical overlay, relating to air safety.

Table A-8 : Capacity & Site Parameters – SA2s with High Incidence of Airspace Designation

Parameters of Airspace Restriction Desig													
	Airspace Restriction Desig Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 202 SA2s	35,310	178,666	327,541	353,961	681,502	1,900	1,340	561	74,152	112,408	16%	123,936	18%
Top 25 SA2s	12,825	25,622	120,813	19,445	140,258	1,592	1,131	461	11,357	21,975	16%	24,227	17%
Remuera South	686	1,430	6,785	1,356	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Pakuranga North	636	929	3,915	558	4,473	1,584	1,134	450	290	880	20%	970	22%
Papakura Central	604	1,259	7,331	-	7,331	1,532	969	563	482	799	11%	881	12%
Takanini West	601	805	5,704	-	5,704	1,214	787	428	448	418	7%	461	8%
Papakura North	583	1,133	5,044	883	5,927	1,092	725	366	620	681	11%	751	13%
Pakuranga Central	563	1,040	6,597	1,225	7,822	1,507	1,076	430	588	1,539	20%	1,697	22%
Westgate South	556	801	5,454	1,146	6,600	1,484	990	494	1,466	1,299	20%	1,432	22%
Māngere Central	553	847	5,863	964	6,827	1,201	931	269	346	798	12%	880	13%
Pakuranga West	544	973	2,823	384	3,207	1,339	912	427	311	631	20%	696	22%
Puhinui South	536	722	1,316	-	1,316	1,151	696	455	205	109	8%	120	9%
Burswood	534	532	2,462	-	2,462	1,211	796	416	33	287	12%	316	13%
Pakuranga Heights South West	532	1,083	4,437	1,141	5,578	1,322	992	330	243	1,098	20%	1,211	22%
Manurewa South	508	771	4,600	16	4,616	1,149	796	353	384	414	9%	456	10%
Papatoetoe Central West	505	1,187	7,956	573	8,529	1,763	1,272	490	580	1,678	20%	1,850	22%
Papatoetoe West	490	1,138	6,609	650	7,259	1,328	941	387	462	1,428	20%	1,574	22%
Onehunga Central	480	1,283	4,054	965	5,019	2,408	1,598	809	767	516	10%	569	11%
Panmure East	476	1,143	3,946	951	4,897	1,701	1,282	419	419	534	11%	589	12%
Avondale South (Auckland)	456	1,483	4,644	2,266	6,910	1,465	1,061	403	778	1,360	20%	1,499	22%
Papatoetoe Central East	455	887	4,716	709	5,425	1,595	1,136	459	408	536	10%	591	11%
Manurewa East	453	888	4,356	807	5,163	1,089	748	342	491	619	12%	682	13%
Ellerslie Central	448	1,165	6,659	928	7,587	3,651	2,940	712	372	1,493	20%	1,646	22%
Puhinui North	417	1,208	2,008	923	2,931	1,470	956	514	415	577	20%	636	22%
West Harbour West	416	1,421	4,978	2,227	7,205	1,132	848	284	499	1,418	20%	1,563	22%
Conifer Grove East	399	719	4,271	409	4,680	1,096	822	274	168	543	12%	599	13%
Mount Wellington Hamlin	394	775	4,285	364	4,649	1,665	1,110	555	297	915	20%	1,009	22%

Figure A-7: P-E Capacity and Projected Growth – Airspace Restriction Designation



4.4.9 Historic Heritage Extent of Place

The Historic Heritage Extent of Place Overlay applies to 4,506 Residential zoned sites, and 854 Business zoned sites, with total plan-enabled capacity for 27,081 (Residential) and 37,455 (Business) net additional dwellings respectively, or 64,536 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 14,525 (Residential) and 29,148 (Business) net additional dwellings respectively, 43,673 in total. That represents 2.1% of Auckland’s total plan-enabled capacity.

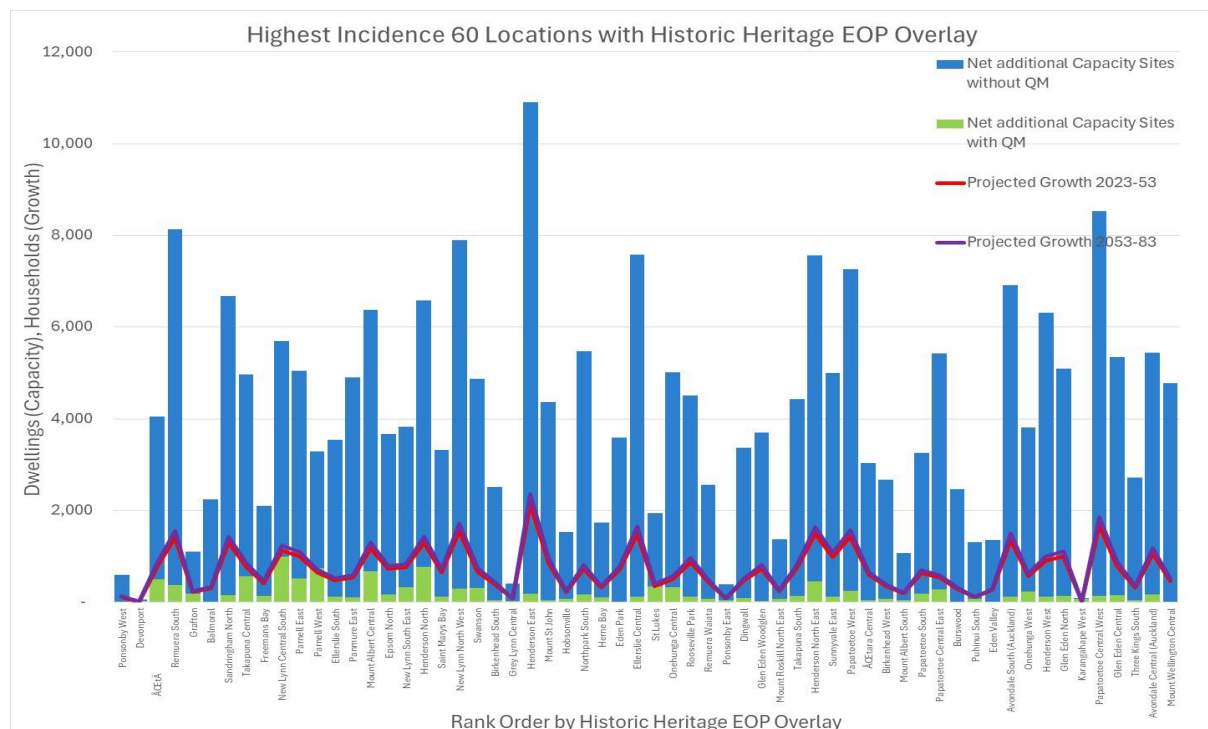
In the same markets where the incidence of Historic Heritage Extent of Place as QMs is greatest, there is plan-enabled capacity for another 381,286 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 395,741 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for all regional household growth, with some margin.

Projected growth suggests 17% of the capacity in these markets could be taken up in the 2023-53 period. These markets accounted for 18% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-9 : Capacity & Site Parameters – SA2s with High Incidence of Historic Heritage Extent

Parameters of Historic Heritage EOP Overlay													
	Historic Heritage EOP Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 108 SA2s	1,493	105,384	14,525	381,216	395,741	2,330	1,630	700	44,192	68,802	17%	75,858	19%
Top 25 SA2s	1,073	27,643	7,425	99,749	107,174	2,830	1,998	832	8,811	19,403	18%	21,391	20%
Ponsonby West	138	827	1	592	593	2,866	2,234	632	147	117	20%	129	22%
Devonport	136	1,318	31	33	64	2,623	1,644	978	65	9	14%	10	16%
Ōhau South West	92	1,433	507	3,547	4,054	1,252	931	320	172	798	20%	880	22%
Grafton	53	528	182	927	1,109	4,034	2,694	1,340	109	218	20%	240	22%
Remuera South	53	1,430	371	7,770	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Sandringham North	52	1,336	157	6,522	6,679	2,230	1,742	488	235	1,297	19%	1,430	21%
Balmoral	52	1,016	-	2,242	2,242	2,163	1,730	432	81	297	13%	327	15%
Takapuna Central	46	1,035	565	4,406	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Freemans Bay	45	1,378	144	1,964	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Parnell West	42	1,137	732	2,550	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Parnell East	42	1,530	516	4,534	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
New Lynn Central South	42	1,225	996	4,701	5,697	2,992	1,676	1,316	632	1,121	20%	1,236	22%
Ellerslie South	38	995	126	3,419	3,545	2,600	1,860	740	280	477	13%	526	15%
Panmure East	29	1,143	109	4,788	4,897	1,701	1,282	419	419	534	11%	589	12%
Mount Albert Central	28	1,207	681	5,696	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Epsom North	22	1,177	175	3,499	3,674	4,633	3,433	1,200	212	723	20%	797	22%
New Lynn South East	22	747	326	3,508	3,834	1,528	995	533	189	754	20%	831	22%
Henderson North	20	725	764	5,817	6,581	1,580	1,156	424	510	1,295	20%	1,428	22%
New Lynn North West	18	1,141	299	7,604	7,903	1,401	834	567	461	1,555	20%	1,714	22%
Saint Marys Bay	18	891	126	3,198	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Swanson	18	1,075	318	4,548	4,866	1,122	656	467	1,048	672	14%	741	15%
Henderson East	17	1,462	182	10,717	10,899	1,234	910	325	857	2,145	20%	2,365	22%
Grey Lynn Central	17	1,156	27	380	407	2,682	2,028	654	339	80	20%	88	22%
Birkenhead South	17	965	43	2,474	2,517	2,223	1,320	903	251	384	15%	423	17%
Mount St John	16	766	47	4,313	4,360	4,205	3,218	987	250	858	20%	946	22%

Figure A-8: P-E Capacity and Projected Growth – Historic Heritage Extent of Place Overlay



4.4.10 Historic Heritage Place

The Historic Heritage Place Overlay applies to just 56 Residential zoned sites, and 4 Business zoned sites, with total plan-enabled capacity for 1,012 (Residential) and 117 (Business) net additional dwellings respectively, or 1,129 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 12 (Residential) and 58 (Business) net additional dwellings respectively, or 70 in total. That represents less than 0.1% of Auckland's total plan-enabled capacity.

Projected growth suggests 15% of the capacity in these markets could be taken up in the 2023-53 period. These markets accounted for 0.4% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-10 : Capacity & Site Parameters – SA2s with High Incidence of Historic Heritage Place Overlay

Parameters of Historic Heritage Place Overlay													
	Historic Heritage Place Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 3 SA2s	21	3,530	12	8,947	8,959	2,395	1,536	859	997	1,378	15%	1,520	17%
Top 3 SA2s	21	3,530	12	8,947	8,959	2,395	1,536	859	997	1,378	15%	1,520	17%
Freemans Bay	19	1,378	-	2,108	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Browns Bay Central	1	1,007	-	2,844	2,844	2,112	1,313	800	727	371	13%	409	14%
Chatswood	1	1,145	12	3,995	4,007	1,601	873	728	54	592	15%	653	16%

Figure A-9: P-E Capacity and Projected Growth – Historic Heritage Place Overlay



4.4.11 National Grid Corridor

The National Grid Corridor Overlay applies to 4,677 Residential zoned sites, and 660 Business zoned sites, with total plan-enabled capacity for 31,307 (Residential) and 31,658 (Business) net additional dwellings respectively, or 62,965 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 8,986 (Residential) and 24,130 (Business) net additional dwellings respectively, 33,116 in total. That represents 1.6% of Auckland's total plan-enabled capacity.

In the same markets where the incidence of National Grid Corridor Overlay as a QM is greatest, there is plan-enabled capacity for another 102,700 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 111,686 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 31% of total regional household growth.

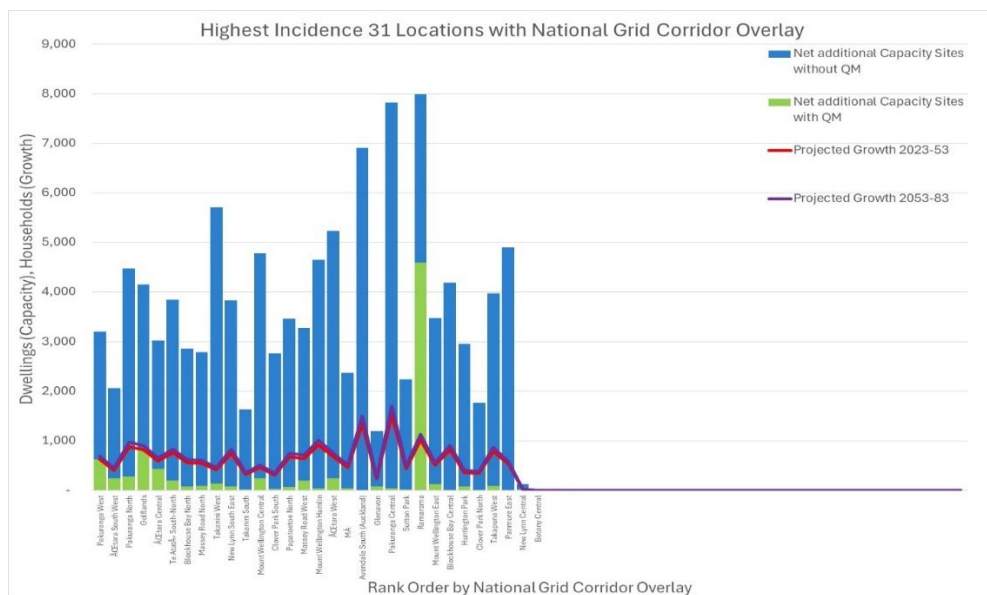
Projected growth suggests 17% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 4.8% of Auckland's total new dwelling consents in the 2017-24 period.

As with the Airspace Restriction provisions, the National Grid Corridor is a technical overlay relating to the safe and efficient functioning of the city.

Table A-11 : Capacity & Site Parameters – SA2s with High Incidence of National Grid Corridor Overlay

Parameters of National Grid Corridor Overlay													
	National Grid Corridor Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 31 SA2s	617	26,096	8,986	102,700	111,686	1,437	992	446	12,190	18,854	17%	20,789	19%
Top 25 SA2s	610	22,061	8,827	87,874	96,701	1,352	920	431	9,944	16,335	17%	18,010	19%
Pakuranga West	115	973	627	2,580	3,207	1,339	912	427	311	631	20%	696	22%
ĀCetara South West	58	464	246	1,812	2,058	867	613	253	105	405	20%	447	22%
Pakuranga North	54	929	275	4,198	4,473	1,584	1,134	450	290	880	20%	970	22%
Golflands	51	1,034	828	3,320	4,148	1,653	1,024	629	347	816	20%	900	22%
ĀCetara Central	42	706	429	2,601	3,030	1,219	834	385	209	596	20%	657	22%
Te Atatū South-North	37	1,061	200	3,648	3,848	1,282	979	303	378	757	20%	835	22%
Blockhouse Bay North	32	836	79	2,781	2,860	1,370	1,011	358	392	563	20%	621	22%
Massey Road North	26	898	91	2,695	2,786	1,332	806	527	412	548	20%	604	22%
Takanini West	25	805	143	5,561	5,704	1,214	787	428	448	418	7%	461	8%
New Lynn South East	20	747	77	3,757	3,834	1,528	995	533	189	754	20%	831	22%
Takanini South	19	939	23	1,617	1,640	964	465	499	1,124	323	20%	356	22%
Mount Wellington Central	18	850	243	4,541	4,784	1,659	1,245	414	592	468	10%	516	11%
Clover Park South	16	864	33	2,725	2,758	1,041	665	376	106	309	11%	341	12%
Papatoetoe North	15	1,445	62	3,401	3,463	1,278	903	375	465	681	20%	751	22%
Massey Road West	14	935	202	3,077	3,279	1,373	847	527	388	645	20%	711	22%
Mount Wellington Hamlin	12	775	43	4,606	4,649	1,665	1,110	555	297	915	20%	1,009	22%
Māngere East	12	672	43	2,323	2,366	1,079	764	316	240	466	20%	514	22%
ĀCetara West	12	693	243	4,989	5,232	1,160	901	259	78	687	13%	757	14%
Avondale South (Auckland)	11	1,483	-	6,910	6,910	1,465	1,061	403	778	1,360	20%	1,499	22%
Glenavon	6	817	79	1,116	1,195	1,297	997	300	327	235	20%	259	22%
Sutton Park	4	759	18	2,228	2,246	967	675	292	90	442	20%	487	22%
Pakuranga Central	4	1,040	39	7,783	7,822	1,507	1,076	430	588	1,539	20%	1,697	22%
Ramarama	3	459	4,598	3,390	7,988	1,469	961	508	775	1,025	13%	1,130	14%
Mount Wellington East	2	1,002	129	3,343	3,472	1,599	1,125	474	381	509	15%	561	16%
Huntington Park	2	875	77	2,872	2,949	2,021	1,123	898	634	363	12%	400	14%

Figure A-10: P-E Capacity and Projected Growth – National Grid Corridor



4.4.12 Notable Group of Trees

The Notable Group of Trees Overlay applies to 350 Residential zoned sites, and 26 Business zoned sites, with total plan-enabled capacity for 3,100 (Residential) and 3,898 (Business) net additional dwellings respectively, or 6,998 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 732 (Residential) and 2,457 (Business) net additional dwellings respectively, 3,189 in total. That represents 0.2% of Auckland’s total plan-enabled capacity.

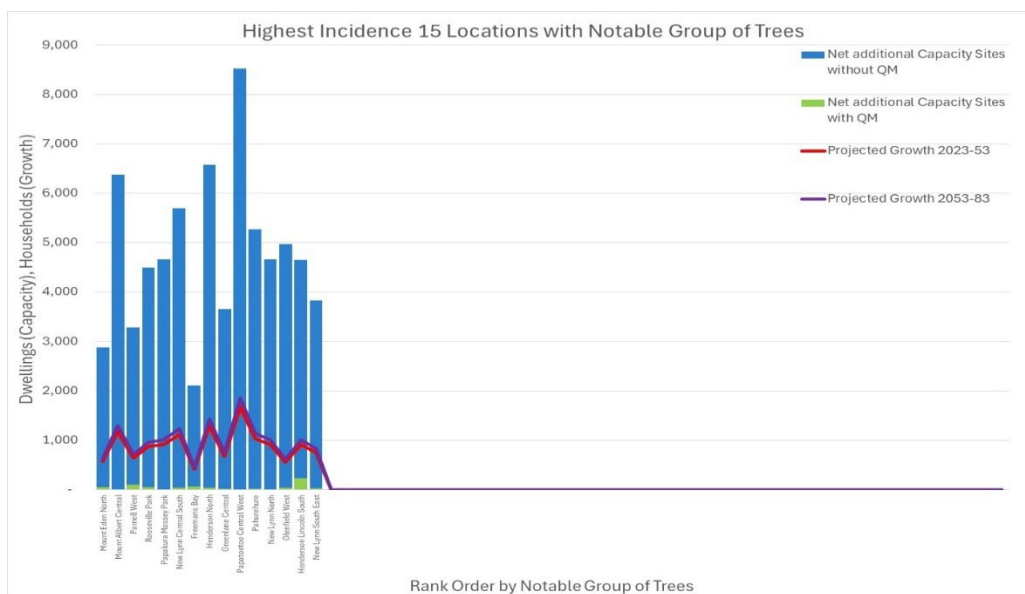
In the same markets where the incidence of Notable Group of Trees Overlay as a QM is greatest, there is plan-enabled capacity for another 70,946 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 71,678 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around one-fifth of total regional household growth.

Projected growth suggests 19% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 2.1% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-12 : Capacity & Site Parameters – SA2s with High Incidence of Notable Group of Trees Overlay

Parameters of Notable Group of Trees													
	Notable Group of Trees Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 15 SA2s	27	16,057	732	70,946	71,678	2,018	1,381	637	5,218	13,557	19%	14,946	21%
Top 15 SA2s	27	16,057	732	70,946	71,678	2,018	1,381	637	5,218	13,557	19%	14,946	21%
Parnell West	3	1,137	97	3,185	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Roseville Park	3	914	56	4,446	4,502	917	596	320	296	877	19%	967	21%
Mount Eden North	3	1,508	58	2,827	2,885	3,444	2,519	925	193	568	20%	626	22%
Mount Albert Central	3	1,207	2	6,375	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Papakura Massey Park	2	895	12	4,652	4,664	986	654	332	216	918	20%	1,012	22%
Freemans Bay	2	1,378	61	2,047	2,108	3,773	2,675	1,098	216	415	20%	458	22%
New Lynn Central South	2	1,225	48	5,649	5,697	2,992	1,676	1,316	632	1,121	20%	1,236	22%
Henderson North	2	725	39	6,542	6,581	1,580	1,156	424	510	1,295	20%	1,428	22%
Papatoetoe Central West	1	1,187	2	8,527	8,529	1,763	1,272	490	580	1,678	20%	1,850	22%
Pahurehure	1	1,132	23	5,246	5,269	1,057	736	321	213	1,037	20%	1,143	22%
Greenlane Central	1	756	14	3,635	3,649	2,915	2,256	658	138	675	18%	744	20%
Henderson Lincoln South	1	966	238	4,418	4,656	1,337	902	435	385	916	20%	1,010	22%
New Lynn South East	1	747	36	3,798	3,834	1,528	995	533	189	754	20%	831	22%
Glenfield West	1	1,112	45	4,932	4,977	1,526	958	568	360	565	11%	623	13%
New Lynn North	1	1,168	1	4,667	4,668	1,384	809	576	287	919	20%	1,013	22%

Figure A-11: P-E Capacity and Projected Growth – Notable Group of Trees



4.4.13 Notable Trees

The Notable Trees Overlay applies to 1,862 Residential zoned sites, and 216 Business zoned sites, with total plan-enabled capacity for 21,198 (Residential) and 17,724 (Business) net additional dwellings respectively, or 38,922 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 11,583 (Residential) and 12,425 (Business) net additional dwellings respectively, or 24,008 in total. That represents 1.2% of Auckland’s total plan-enabled capacity.

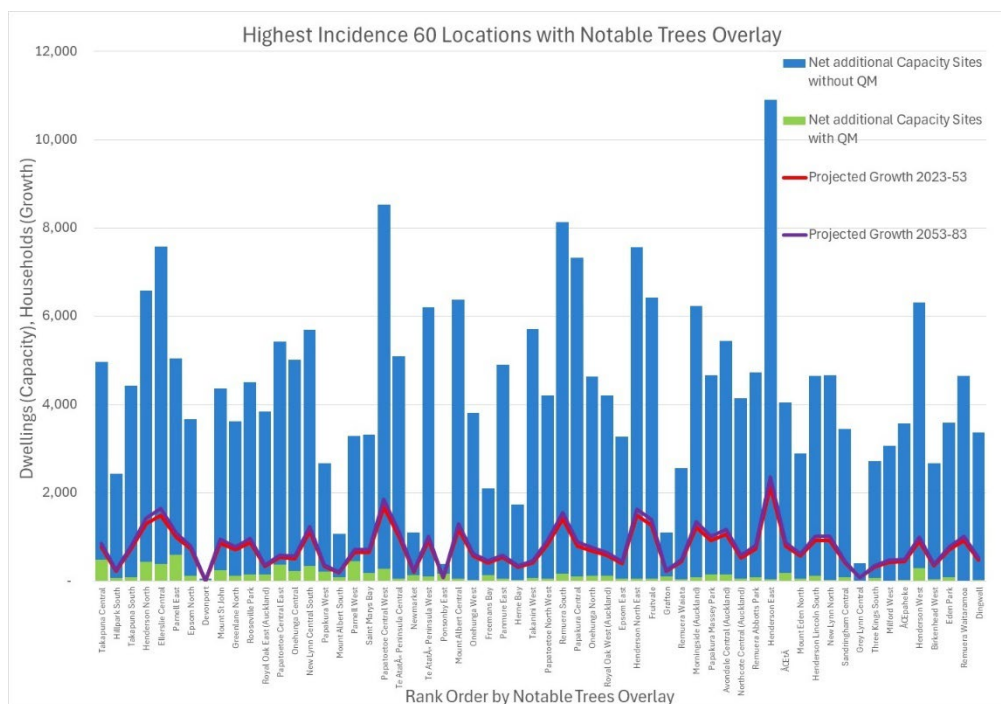
In the same markets where the incidence of Notable Trees Overlay as a QM is greatest, there is plan-enabled capacity for another 478,387 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 489,970 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around one-and a half times total regional household growth.

Projected growth indicates 17% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 20% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-13 : Capacity & Site Parameters – SA2s with High Incidence of Notable Trees Overlay

Parameters of Notable Trees Overlay													
	Notable Trees Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 128 SA2s	500	124,229	11,583	478,387	489,970	2,241	1,587	655	50,392	82,450	17%	90,907	19%
Top 25 SA2s	275	25,665	5,575	97,127	102,702	2,868	2,030	838	9,836	17,492	17%	19,287	19%
Takapuna Central	39	1,035	491	4,480	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Hillpark South	17	1,057	78	2,349	2,427	1,271	836	435	273	228	9%	251	10%
Takapuna South	16	985	87	4,340	4,427	4,640	3,164	1,477	350	741	17%	817	18%
Henderson North	15	725	434	6,147	6,581	1,580	1,156	424	510	1,295	20%	1,428	22%
Parnell East	13	1,530	597	4,453	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Ellerslie Central	13	1,165	393	7,194	7,587	3,651	2,940	712	372	1,493	20%	1,646	22%
Roseville Park	11	914	150	4,352	4,502	917	596	320	296	877	19%	967	21%
Epsom North	11	1,177	117	3,557	3,674	4,633	3,433	1,200	212	723	20%	797	22%
Greenlane North	11	679	125	3,493	3,618	3,625	2,819	806	186	712	20%	785	22%
Mount St John	11	766	241	4,119	4,360	4,205	3,218	987	250	858	20%	946	22%
Devonport	11	1,318	19	45	64	2,623	1,644	978	65	9	14%	10	16%
Royal Oak East (Auckland)	10	1,042	159	3,685	3,844	2,948	2,270	678	342	327	9%	361	9%
Papatoetoe Central East	10	887	370	5,055	5,425	1,595	1,136	459	408	536	10%	591	11%
Onehunga Central	9	1,283	229	4,790	5,019	2,408	1,598	809	767	516	10%	569	11%
Mount Albert South	8	834	86	987	1,073	2,628	1,692	936	167	191	18%	211	20%
New Lynn Central South	8	1,225	348	5,349	5,697	2,992	1,676	1,316	632	1,121	20%	1,236	22%
Papakura West	8	701	217	2,447	2,664	1,325	841	484	125	330	12%	364	14%
Parnell West	8	1,137	449	2,833	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Newmarket	7	255	144	951	1,095	3,593	2,615	978	796	215	20%	237	22%
Papatoetoe Central West	7	1,187	286	8,243	8,529	1,763	1,272	490	580	1,678	20%	1,850	22%
Te Atatua Peninsula Central	7	1,207	64	5,027	5,091	1,365	947	418	672	1,002	20%	1,105	22%
Saint Marys Bay	7	891	186	3,138	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Te Atatua Peninsula West	6	1,333	110	6,089	6,199	1,340	974	366	728	923	15%	1,018	16%
Onehunga West	6	1,249	31	3,775	3,806	1,972	1,510	461	280	564	15%	622	16%
Ponsonby East	6	1,083	164	229	393	2,794	2,182	611	88	77	20%	85	22%

Figure A-12: P-E Capacity and Projected Growth – Notable Trees Overlay



4.4.14 Outstanding Natural Features

The Outstanding Natural Features Overlay applies to 2,213 Residential zoned sites, and 160 Business zoned sites, with total plan-enabled capacity for 8,009 (Residential) and 4,454 (Business) net additional dwellings respectively, or 12,553 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 2,637 (Residential) and 4,371 (Business) net additional dwellings respectively, or 7,008 in total. That represents 0.3% of Auckland's total plan-enabled capacity.

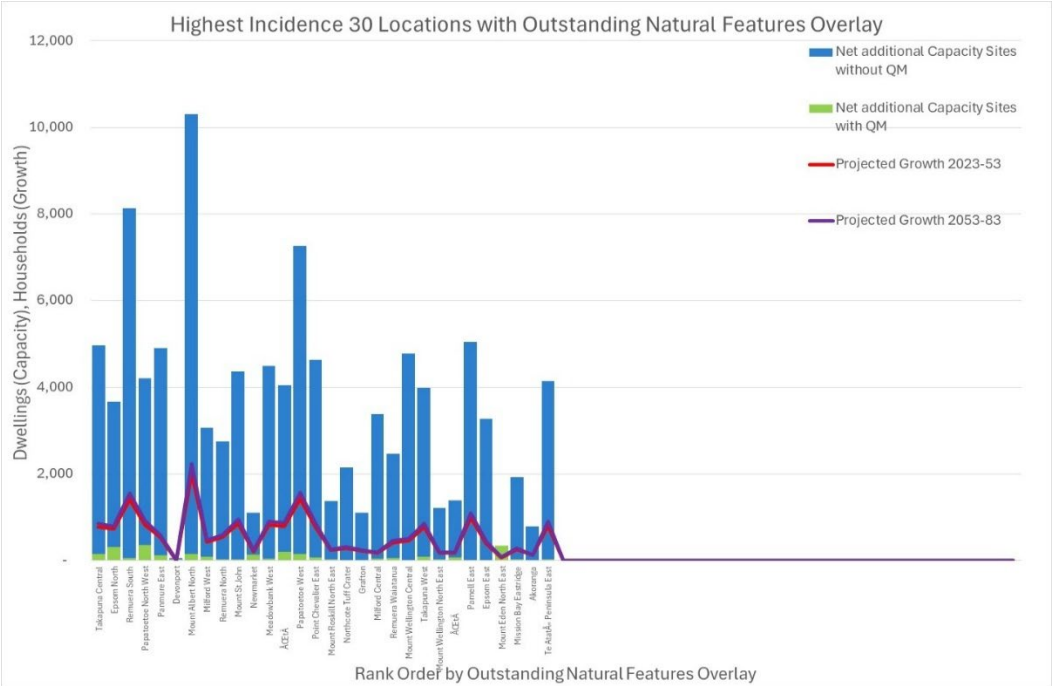
In the same markets where the incidence of Outstanding Natural Features Overlay as a QM is greatest, there is plan-enabled capacity for another 102,692 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 105,329 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 28% of total regional household growth.

Projected growth indicates 17% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 4% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-14 : Capacity & Site Parameters – SA2s with High Incidence of Outstanding Features Overlay

Parameters of Outstanding Natural Features Overlay													
	Outstanding Natural Features Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 30 SA2s	383	28,067	2,637	102,692	105,329	2,921	2,095	826	10,791	17,755	17%	19,575	19%
Top 25 SA2s	376	24,307	2,249	90,830	93,079	2,806	2,026	781	8,826	15,502	17%	17,090	18%
Takapuna Central	78	1,035	153	4,818	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Epsom North	58	1,177	303	3,371	3,674	4,633	3,433	1,200	212	723	20%	797	22%
Remuera South	29	1,430	63	8,078	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Papatoetoe North West	26	793	361	3,852	4,213	1,238	845	393	428	829	20%	914	22%
Panmure East	25	1,143	125	4,772	4,897	1,701	1,282	419	419	534	11%	589	12%
Devonport	14	1,318	22	42	64	2,623	1,644	978	65	9	14%	10	16%
Milford West	14	1,298	90	2,979	3,069	2,647	2,048	599	232	425	14%	469	15%
Mount Albert North	14	1,420	160	10,152	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Remuera North	13	1,310	21	2,724	2,745	4,110	3,008	1,102	191	539	20%	594	22%
Meadowbank West	12	1,216	48	4,439	4,487	2,832	1,881	951	425	818	18%	902	20%
Mount St John	12	766	33	4,327	4,360	4,205	3,218	987	250	858	20%	946	22%
Newmarket	12	255	135	960	1,095	3,593	2,615	978	796	215	20%	237	22%
Āwhiwhi South West	9	1,433	195	3,859	4,054	1,252	931	320	172	798	20%	880	22%
Papatoetoe West	8	1,138	152	7,107	7,259	1,328	941	387	462	1,428	20%	1,574	22%
Point Chevalier East	7	1,144	77	4,561	4,638	2,084	1,589	494	356	774	17%	853	18%
Mount Roskill North East	7	740	21	1,348	1,369	1,210	968	242	131	234	17%	258	19%
Grafton	6	528	1	1,108	1,109	4,034	2,694	1,340	109	218	20%	240	22%
Northcote Tuff Crater	6	815	-	2,145	2,145	1,888	1,286	602	135	292	14%	322	15%
Milford Central	5	886	41	3,349	3,390	4,724	3,295	1,430	299	177	5%	195	6%
Remuera Waiaatarua	5	888	50	2,417	2,467	2,348	1,726	621	194	413	17%	455	18%
Takapuna West	4	1,100	91	3,888	3,979	4,131	2,971	1,160	1,109	783	20%	863	22%
Mount Wellington Central	4	850	2	4,782	4,784	1,659	1,245	414	592	468	10%	516	11%
Āwhiwhi Central	3	130	76	1,308	1,384	1,754	1,181	573	257	179	13%	197	14%
Mount Wellington North East	3	711	25	1,181	1,206	2,064	1,544	520	185	174	14%	192	16%
Epsom East	2	783	4	3,263	3,267	4,105	3,019	1,086	576	398	12%	439	13%

Figure A-13: P-E Capacity and Projected Growth – Outstanding Natural Features Overlay



4.4.15 Significant Ecological Areas

The Significant Ecological Areas Overlay applies to 14,775 Residential zoned sites, and 290 Business zoned sites, with total plan-enabled capacity for 35,777 (Residential) and 31,228 (Business) net additional dwellings respectively, or 67,005 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 4,066 (Residential) and 28,652 (Business) net additional dwellings respectively, or 32,718 in total. That represents 1.6% of Auckland’s total plan-enabled capacity.

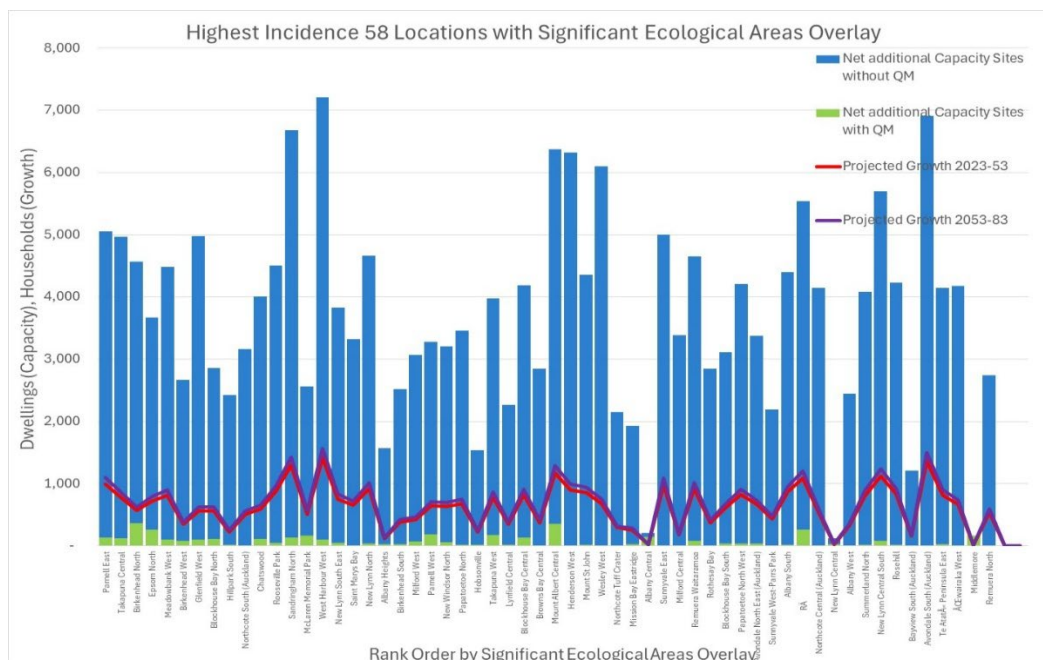
In the same markets where the incidence of Significant Ecological Areas Overlay as a QM is greatest, there is plan-enabled capacity for another 209,689 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 213,755 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around two thirds of total regional household growth.

Projected growth indicates 17% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 10% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-15 : Capacity & Site Parameters – SA2s with High Incidence of Significant Ecological Areas Overlay

Parameters of Significant Ecological Areas Overlay													
	Significant Ecological Areas Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 58 SA2s	635	58,455	4,066	209,689	213,755	2,222	1,519	704	24,822	36,844	17%	40,621	19%
Top 25 SA2s	547	27,471	2,368	91,892	94,260	2,281	1,539	743	8,894	16,206	17%	17,867	19%
Parnell East	60	1,530	132	4,918	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Takapuna Central	54	1,035	124	4,847	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Birkenhead North	53	1,097	363	4,207	4,570	2,035	1,183	852	225	568	12%	626	14%
Epsom North	52	1,177	259	3,415	3,674	4,633	3,433	1,200	212	723	20%	797	22%
Meadowbank West	42	1,216	99	4,388	4,487	2,832	1,881	951	425	818	18%	902	20%
Birkenhead West	39	1,212	84	2,580	2,664	1,861	910	951	410	345	13%	380	14%
Glenfield West	27	1,112	105	4,872	4,977	1,526	958	568	360	565	11%	623	13%
Blockhouse Bay North	20	836	113	2,747	2,860	1,370	1,011	358	392	563	20%	621	22%
Northcote South (Auckland)	19	913	5	3,157	3,162	2,037	1,380	657	139	507	16%	559	18%
Hillpark South	19	1,057	22	2,405	2,427	1,271	836	435	273	228	9%	251	10%
Chatswood	17	1,145	115	3,892	4,007	1,601	873	728	54	592	15%	653	16%
Roseville Park	16	914	53	4,449	4,502	917	596	320	296	877	19%	967	21%
Sandringham North	14	1,336	136	6,543	6,679	2,230	1,742	488	235	1,297	19%	1,430	21%
McLaren Memorial Park	13	1,005	169	2,397	2,566	946	687	259	212	505	20%	557	22%
Saint Marys Bay	11	891	-	3,324	3,324	4,802	3,338	1,464	139	654	20%	721	22%
New Lynn South East	11	747	50	3,784	3,834	1,528	995	533	189	754	20%	831	22%
West Harbour West	11	1,421	101	7,104	7,205	1,132	848	284	499	1,418	20%	1,563	22%
Albany Heights	10	1,412	23	1,543	1,566	2,295	1,250	1,045	1,299	113	7%	125	8%
New Lynn North	10	1,168	41	4,627	4,668	1,384	809	576	287	919	20%	1,013	22%
Milford West	9	1,298	67	3,002	3,069	2,647	2,048	599	232	425	14%	469	15%
Parnell West	9	1,137	185	3,097	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Birkenhead South	9	965	31	2,486	2,517	2,223	1,320	903	251	384	15%	423	17%
New Windsor North	8	954	61	3,141	3,202	1,351	1,090	261	261	630	20%	695	22%
Hobsonville	7	448	13	1,521	1,534	1,529	952	577	441	218	14%	240	16%
Papatoetoe North	7	1,445	17	3,446	3,463	1,278	903	375	465	681	20%	751	22%

Figure A-14: P-E Capacity and Projected Growth – Significant Ecological Areas Overlay



4.4.16 Sites and Places of Significance to Mana Whenua

The Sites and Places of Significance to Mana Whenua Overlay applies to 599 Residential zoned sites, and 78 Business zoned sites, with total plan-enabled capacity for 3,029 (Residential) and 1,276 (Business) net additional dwellings respectively, or 4,305 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is

for 1,412 (Residential) and 1,276 (Business) net additional dwellings respectively, or 2,688 in total. That represents 0.1% of Auckland’s total plan-enabled capacity.

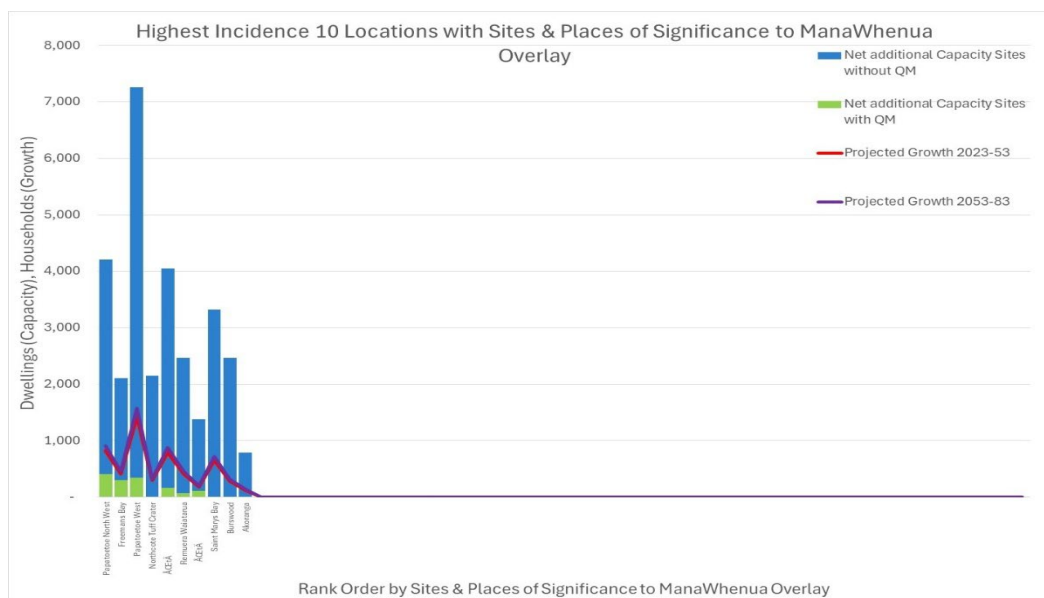
In the same markets where the incidence of Sites and Places of Significance to Mana Whenua Overlay as a QM is greatest, there is plan-enabled capacity for another 28,788 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 30,200 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around one-twelfth of total regional household growth.

Projected growth indicates 18% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 0.9% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-16 : Capacity & Site Parameters – SA2s with High Incidence of Places of Significance to Mana Whenua

Parameters of Sites & Places of Significance to ManaWhenua Overlay													
	Sites & Places of Significance to ManaWhenua Overlay Sites	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 10 SA2s	116	8,477	1,412	28,788	30,200	2,239	1,562	677	2,244	5,417	18%	5,972	20%
Top 10 SA2s	116	8,477	1,412	28,788	30,200	2,239	1,562	677	2,244	5,417	18%	5,972	20%
Papatoetoe North West	23	793	411	3,802	4,213	1,238	845	393	428	829	20%	914	22%
Freemans Bay	22	1,378	301	1,807	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Papatoetoe West	21	1,138	347	6,912	7,259	1,328	941	387	462	1,428	20%	1,574	22%
Northcote Tuff Orater	13	815	-	2,145	2,145	1,888	1,286	602	135	292	14%	322	15%
ACEA Waiuku South West	12	1,433	160	3,894	4,054	1,252	931	320	172	798	20%	880	22%
Remuera Waiatarua	9	888	75	2,392	2,467	2,348	1,726	621	194	413	17%	455	18%
ACEA Waiuku Central	7	130	112	1,272	1,384	1,754	1,181	573	257	179	13%	197	14%
Saint Marys Bay	4	891	-	3,324	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Burswood	4	532	6	2,456	2,462	1,211	796	416	33	287	12%	316	13%
Akoranga	1	479	-	784	784	3,293	1,832	1,461	208	122	16%	135	17%

Figure A-15: P-E Capacity and Projected Growth –Places of Significance to Mana Whenua



4.4.17 Waitakere Ranges Heritage Area Overlay

The Waitakere Ranges Heritage Area Overlay applies to 5,692 Residential zoned sites, and 30 Business zoned sites, with total plan-enabled capacity for 2,206 (Residential) and 516 (Business) net additional dwellings respectively, or 2,722 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 374

(Residential) though 0 (Business) net additional dwellings. That represents 0.02% of Auckland’s total plan-enabled capacity.

In the same markets where the incidence of Waitakere Ranges Heritage Area Overlay as a QM is greatest, there is plan-enabled capacity for another 6,749 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 7,123 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 2% of total regional household growth.

Projected growth indicates 16% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 0.7% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-17 : Capacity & Site Parameters – SA2s with High Incidence of Waitakere Ranges Heritage Overlay

Parameters of Waitakere Ranges Heritage Area Overlay													
	Waitakere Ranges Heritage Area Overlay Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 3 SA2s	73	1,763	374	6,749	7,123	1,071	618	453	1,825	1,116	16%	1,230	17%
Top 3 SA2s	73	1,763	374	6,749	7,123	1,071	618	453	1,825	1,116	16%	1,230	17%
Swanson Rural	50	39	23	45	68	1,374	851	523	188	13	19%	14	21%
Swanson	16	1,075	297	4,569	4,866	1,122	656	467	1,048	672	14%	741	15%
Sunnyvale West-Parrs Park	7	649	54	2,135	2,189	947	525	422	589	431	20%	475	22%

Figure A-16: P-E Capacity and Projected Growth –Waitakere Ranges Heritage



4.4.18 Coastal Environment Overlay

The Coastal Environment Overlay applies to 3,440 Residential zoned sites, and 236 Business zoned sites, with total plan-enabled capacity for 15,613 (Residential) and 6,648 (Business) net additional dwellings respectively, or 22,261 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 14,749 (Residential) and 6,616 (Business) net additional dwellings for 21,365 in total. That represents 1% of Auckland’s total plan-enabled capacity.

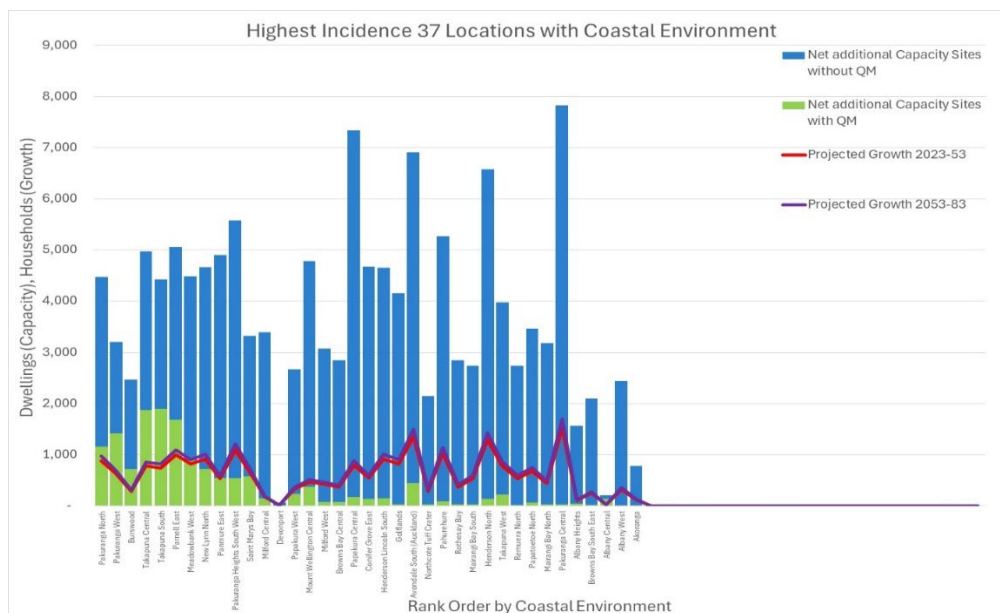
In the same markets where the incidence of Coastal Environment Overlay as a QM is greatest, there is plan-enabled capacity for another 125,208 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 139,957 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 39% of total regional household growth.

Projected growth indicates 16% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 6.0% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-18 : Capacity & Site Parameters – SA2s with High Incidence of Coastal Environment Overlay

Parameters of Coastal Environment													
	Coastal Environment Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 37 SA2s	3,240	37,495	14,749	125,208	139,957	2,325	1,594	731	15,207	22,912	16%	25,261	18%
Top 25 SA2s	3,147	25,983	14,028	88,312	102,340	2,328	1,604	724	8,265	16,255	16%	17,922	18%
Pakuranga North	386	929	1,154	3,319	4,473	1,584	1,134	450	290	880	20%	970	22%
Pakuranga West	377	973	1,418	1,789	3,207	1,339	912	427	311	631	20%	696	22%
Burswood	323	532	721	1,741	2,462	1,211	796	416	33	287	12%	316	13%
Takapuna Central	286	1,035	1,877	3,094	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Takapuna South	219	985	1,896	2,531	4,427	4,640	3,164	1,477	350	741	17%	817	18%
Parnell East	197	1,530	1,687	3,363	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Meadowbank West	178	1,216	883	3,604	4,487	2,832	1,881	951	425	818	18%	902	20%
New Lynn North	165	1,168	718	3,950	4,668	1,384	809	576	287	919	20%	1,013	22%
Panmure East	129	1,143	538	4,359	4,897	1,701	1,282	419	419	534	11%	589	12%
Pakuranga Heights South West	121	1,083	544	5,034	5,578	1,322	992	330	243	1,098	20%	1,211	22%
Saint Marys Bay	119	891	581	2,743	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Milford Central	96	886	155	3,235	3,390	4,724	3,295	1,430	299	177	5%	195	6%
Devonport	91	1,318	6	58	64	2,623	1,644	978	65	9	14%	10	16%
Papakura West	83	701	235	2,429	2,664	1,325	841	484	125	330	12%	364	14%
Mount Wellington Central	54	850	373	4,411	4,784	1,659	1,245	414	592	468	10%	516	11%
Milford West	45	1,298	81	2,988	3,069	2,647	2,048	599	232	425	14%	469	15%
Browns Bay Central	42	1,007	78	2,766	2,844	2,112	1,313	800	727	371	13%	409	14%
Papakura Central	37	1,259	169	7,162	7,331	1,532	969	563	482	799	11%	881	12%
Conifer Grove East	33	719	142	4,538	4,680	1,096	822	274	168	543	12%	599	13%
Avondale South (Auckland)	31	1,483	451	6,459	6,910	1,465	1,061	403	778	1,360	20%	1,499	22%
Golflands	31	1,034	31	4,117	4,148	1,653	1,024	629	347	816	20%	900	22%
Henderson Lincoln South	31	966	144	4,512	4,656	1,337	902	435	385	916	20%	1,010	22%
Northcote Tuff Crater	27	815	30	2,115	2,145	1,888	1,286	602	135	292	14%	322	15%
Pahurehure	26	1,132	86	5,183	5,269	1,057	736	321	213	1,037	20%	1,143	22%
Roths Bay	20	1,030	30	2,812	2,842	2,192	1,522	670	309	374	13%	412	14%

Figure A-17: P-E Capacity and Projected Growth –Coastal Environment Overlay



4.4.19 Cohesive Zoning

The Cohesive Zoning Overlay applies to 1,084 Residential zoned sites, and 29 Business zoned sites, with total plan-enabled capacity for 3,277 (Residential) and 423 (Business) net additional dwellings respectively, or 3,700 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 3,263 (Residential) and 423 (Business) net additional dwellings for 3,686 in total. That represents 0.2% of Auckland's total plan-enabled capacity.

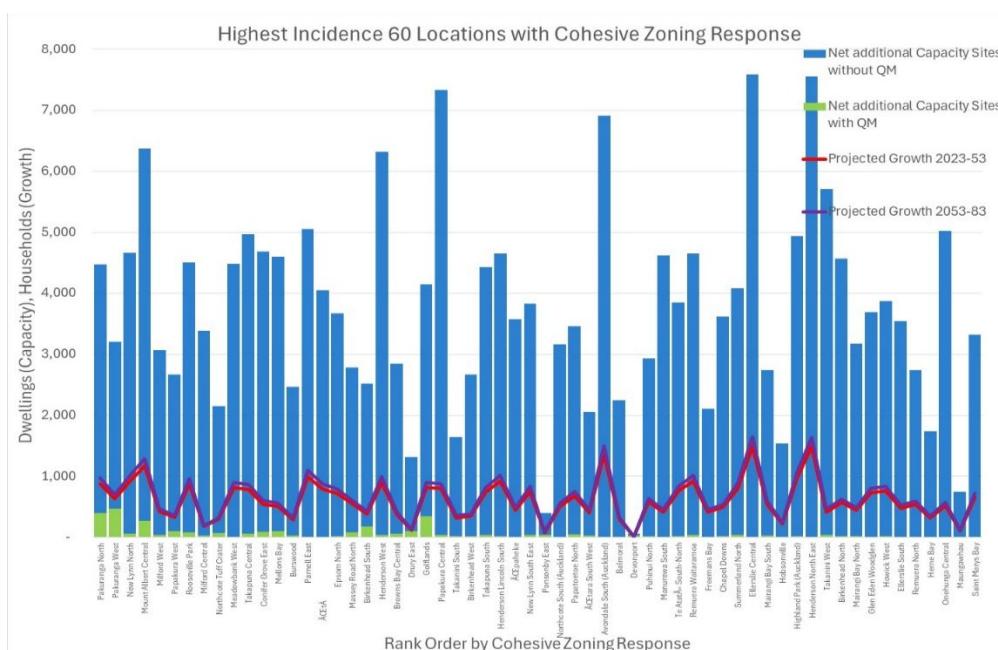
In the same markets where the incidence of Cohesive Zoning as a QM is greatest, there is plan-enabled capacity for another 252,367 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 255,360 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 73% of total regional household growth.

Projected growth indicates 17% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 9% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-19 : Capacity & Site Parameters – SA2s with High Incidence of Cohesive Zoning Response

Parameters of Cohesive Zoning Response													
	Cohesive Zoning Response Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 67 SA2s	1,079	69,191	3,263	252,367	255,630	2,213	1,538	675	23,375	42,221	17%	46,551	18%
Top 25 SA2s	805	25,165	2,656	90,058	92,714	2,259	1,534	725	8,482	14,970	16%	16,505	18%
Pakuranga North	118	929	395	4,078	4,473	1,584	1,134	450	290	880	20%	970	22%
Pakuranga West	107	973	466	2,741	3,207	1,339	912	427	311	631	20%	696	22%
New Lynn North	79	1,168	58	4,610	4,668	1,384	809	576	287	919	20%	1,013	22%
Mount Albert Central	43	1,207	274	6,103	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
Milford West	39	1,298	40	3,029	3,069	2,647	2,048	599	232	425	14%	469	15%
Papakura West	36	701	102	2,562	2,664	1,325	841	484	125	330	12%	364	14%
Rooseville Park	32	914	76	4,426	4,502	917	596	320	296	877	19%	967	21%
Milford Central	29	886	23	3,367	3,390	4,724	3,295	1,430	299	177	5%	195	6%
Northcote Tuff Crater	26	815	68	2,077	2,145	1,888	1,286	602	135	292	14%	322	15%
Meadowbank West	26	1,216	6	4,481	4,487	2,832	1,881	951	425	818	18%	902	20%
Takapuna Central	24	1,035	56	4,915	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Conifer Grove East	23	719	88	4,592	4,680	1,096	822	274	168	543	12%	599	13%
Mellons Bay	23	1,447	102	4,501	4,603	2,311	1,639	672	304	513	11%	566	12%
Burswood	22	532	26	2,436	2,462	1,211	796	416	33	287	12%	316	13%
Parnell East	22	1,530	8	5,042	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Ātāhūhu South West	21	1,433	2	4,052	4,054	1,252	931	320	172	798	20%	880	22%
Epsom North	18	1,177	14	3,660	3,674	4,633	3,433	1,200	212	723	20%	797	22%
Massey Road North	17	898	84	2,702	2,786	1,332	806	527	412	548	20%	604	22%
Birkenhead South	17	965	173	2,344	2,517	2,223	1,320	903	251	384	15%	423	17%
Henderson West	17	898	42	6,279	6,321	1,257	862	396	429	903	14%	996	16%
Browns Bay Central	15	1,007	62	2,782	2,844	2,112	1,313	800	727	371	13%	409	14%
Drury East	14	232	104	1,214	1,318	1,399	995	404	266	118	9%	130	10%
Golflands	13	1,034	346	3,802	4,148	1,653	1,024	629	347	816	20%	900	22%
Birkenhead West	12	1,212	19	2,645	2,664	1,861	910	951	410	345	13%	380	14%
Takanini South	12	939	22	1,618	1,640	964	465	499	1,124	323	20%	356	22%

Figure A-18: P-E Capacity and Projected Growth –Cohesive Zoning Overlay



4.4.20 Combined Wastewater Network Control

The Combined Wastewater Network Control applies to 14,574 Residential zoned sites, and 457 Business zoned sites, with total plan-enabled capacity for 57,481 (Residential) and 8,368 (Business) net additional dwellings respectively, or 65,844 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 25,585

(Residential) and 6,869 (Business) net additional dwellings for 32,454 in total. That represents 1.6% of Auckland's total plan-enabled capacity.

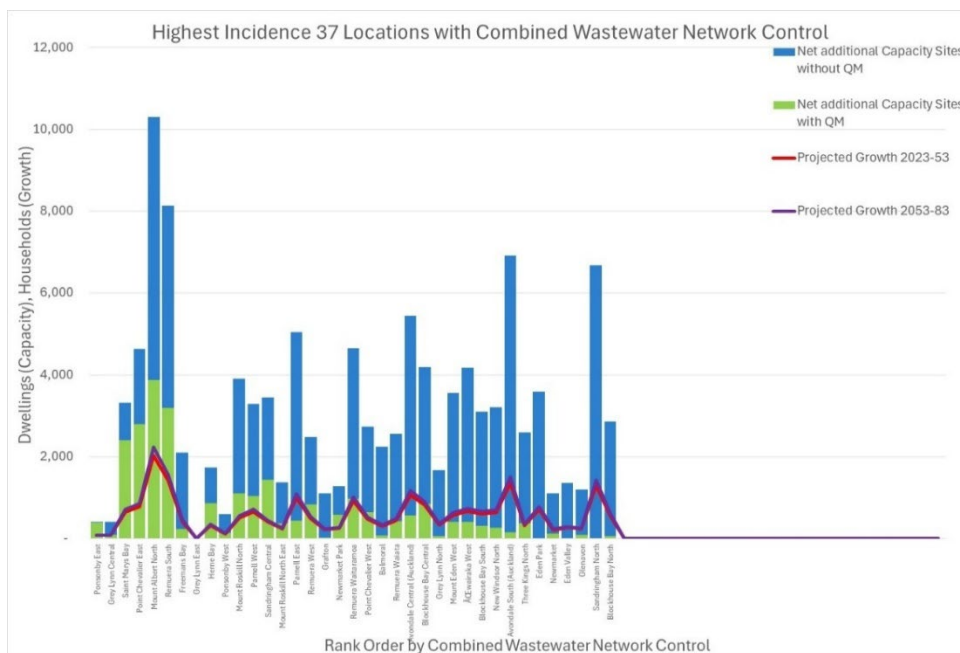
In the same markets where the incidence of Combined Wastewater Network Control as a QM is greatest, there is plan-enabled capacity for another 91,798 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 117,383 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 39% of total regional household growth.

Projected growth indicates 18% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 4.8% of Auckland's total new dwelling consents in the 2017-24 period.

Table A-20 : Capacity & Site Parameters – SA2s with High Incidence of Combined Wastewater Network Control

Parameters of Combined Wastewater Network Control													
	Combined Wastewater Network Control Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 37 SA2s	5,065	37,285	25,585	91,798	117,383	2,936	2,131	805	12,570	21,418	18%	23,616	20%
Top 25 SA2s	4,827	26,229	23,377	53,685	77,062	3,376	2,427	950	7,517	13,979	18%	15,413	20%
Ponsonby East	748	1,083	392	1	393	2,794	2,182	611	88	77	20%	85	22%
Grey Lynn Central	568	1,156	89	318	407	2,682	2,028	654	339	80	20%	88	22%
Saint Marys Bay	389	891	2,395	929	3,324	4,802	3,338	1,464	139	654	20%	721	22%
Mount Albert North	338	1,420	3,875	6,437	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Point Chevalier East	338	1,144	2,798	1,840	4,638	2,084	1,589	494	356	774	17%	853	18%
Remuera South	282	1,430	3,193	4,948	8,141	3,626	2,637	988	285	1,405	17%	1,549	19%
Freemans Bay	231	1,378	231	1,877	2,108	3,773	2,675	1,098	216	415	20%	458	22%
Grey Lynn East	182	275	9	-	9	1,809	1,434	375	633	2	22%	2	22%
Herne Bay	180	1,357	865	869	1,734	6,264	4,300	1,965	202	318	18%	351	20%
Ponsonby West	179	827	131	462	593	2,866	2,234	632	147	117	20%	129	22%
Mount Roskill North	168	1,289	1,096	2,815	3,911	1,867	1,411	456	296	507	13%	559	14%
Parnell West	139	1,137	1,033	2,249	3,282	5,993	3,802	2,190	687	646	20%	712	22%
Sandringham Central	135	852	1,436	2,010	3,446	2,099	1,622	477	144	409	12%	451	13%
Mount Roskill North East	130	740	376	993	1,369	1,210	968	242	131	234	17%	258	19%
Parnell East	116	1,530	445	4,605	5,050	5,688	3,999	1,689	309	994	20%	1,096	22%
Remuera West	93	852	826	1,662	2,488	4,577	3,274	1,303	298	490	20%	540	22%
Grafton	79	528	32	1,077	1,109	4,034	2,694	1,340	109	218	20%	240	22%
Newmarket Park	76	598	572	710	1,282	5,506	3,102	2,404	318	252	20%	278	22%
Remuera Waitaramoa	75	1,546	969	3,684	4,653	5,453	3,843	1,610	278	916	20%	1,010	22%
Point Chevalier West	73	1,321	651	2,077	2,728	2,643	1,926	717	593	475	17%	524	19%
Balmoral	71	1,016	78	2,164	2,242	2,163	1,730	432	81	297	13%	327	15%
Remuera Waiata	66	1,120	419	2,134	2,553	5,362	3,507	1,855	230	448	18%	494	19%
Avondale Central (Auckland)	59	707	569	4,867	5,436	1,882	1,437	445	855	1,070	20%	1,180	22%
Grey Lynn North	56	896	54	1,613	1,667	2,788	2,129	659	118	328	20%	362	22%
Blockhouse Bay Central	56	1,136	843	3,344	4,187	1,609	1,190	419	321	824	20%	909	22%

Figure A-19: P-E Capacity and Projected Growth –Combined Wastewater Network



4.4.21 Comprehensive Integrated Planning Outcome

The Comprehensive Integrated Planning Outcome applies to 13,468 Residential zoned sites, and 356 Business zoned sites, with total plan-enabled capacity for 49,856 (Residential) and 53,244 (Business) net additional dwellings respectively, or 103,100 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 5,051 (Residential) and 36,405 (Business) net additional dwellings for 41,456 in total. That represents 2% of Auckland’s total plan-enabled capacity.

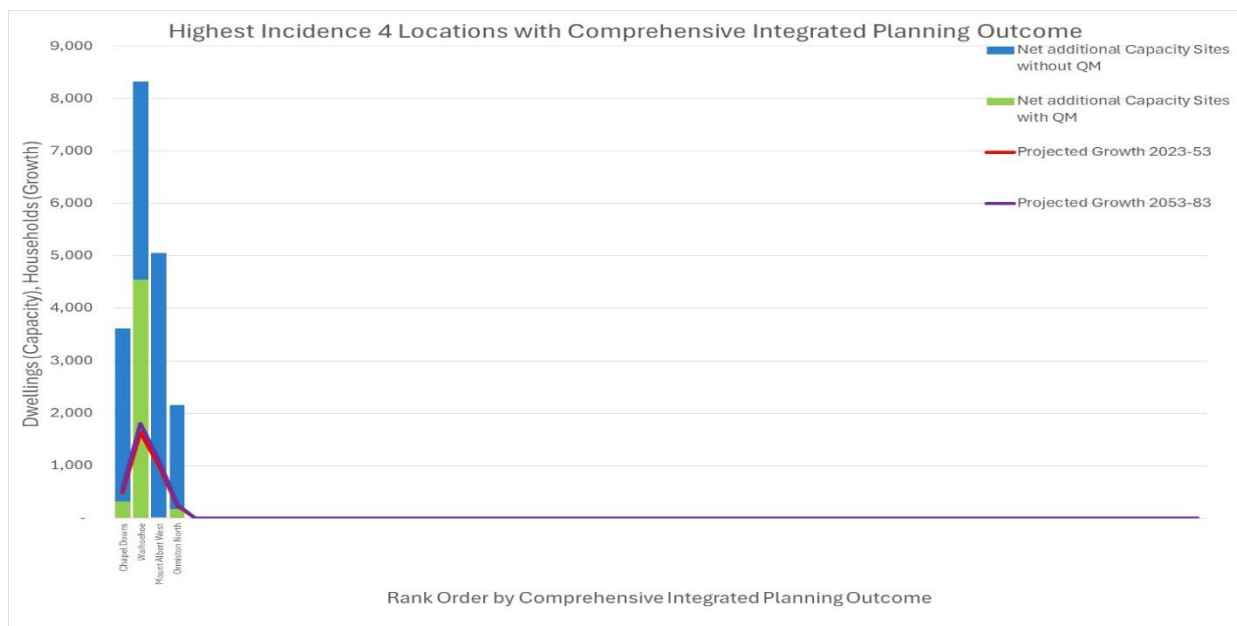
In the same markets where the incidence of Comprehensive Integrated Planning Outcome as a QM is greatest, there is plan-enabled capacity for another 14,095 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 19,146 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 5% of total regional household growth.

Projected growth indicates 18% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 0.7% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-21 : Capacity & Site Parameters – SA2s with High Incidence of Comprehensive Integrated Planning

Parameters of Comprehensive Integrated Planning Outcome													
	Comprehensi ve Integrated Planning Outcome Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053- 2083 as % Capacity
Total Auckland 4 SA2s	126	2,413	5,051	14,095	19,146	1,778	1,276	501	1,939	3,367	18%	3,713	19%
Top 4 SA2s	126	2,413	5,051	14,095	19,146	1,778	1,276	501	1,939	3,367	18%	3,713	19%
Chapel Downs	70	877	318	3,299	3,617	1,125	716	409	469	493	14%	544	15%
Waihoehoe	51	79	4,542	3,777	8,319	4,729	4,426	303	427	1,637	20%	1,805	22%
Mount Albert West	3	883	23	5,030	5,053	2,050	1,549	501	475	994	20%	1,096	22%
Ormiston North	2	574	168	1,989	2,157	1,823	1,151	672	568	243	11%	268	12%

Figure A-20: P-E Capacity and Projected Growth –Comprehensive Integrated Planning



4.4.22 Lakeside Setback

The Lakeside Setback applies to 274 Residential zoned sites, and 3 Business zoned sites, with total plan-enabled capacity for 1,753 (Residential) and 250 (Business) net additional dwellings respectively, or 2,003 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 1,558 (Residential) and 244 (Business) net additional dwellings for 1,802 in total. That represents 0.1% of Auckland’s total plan-enabled capacity.

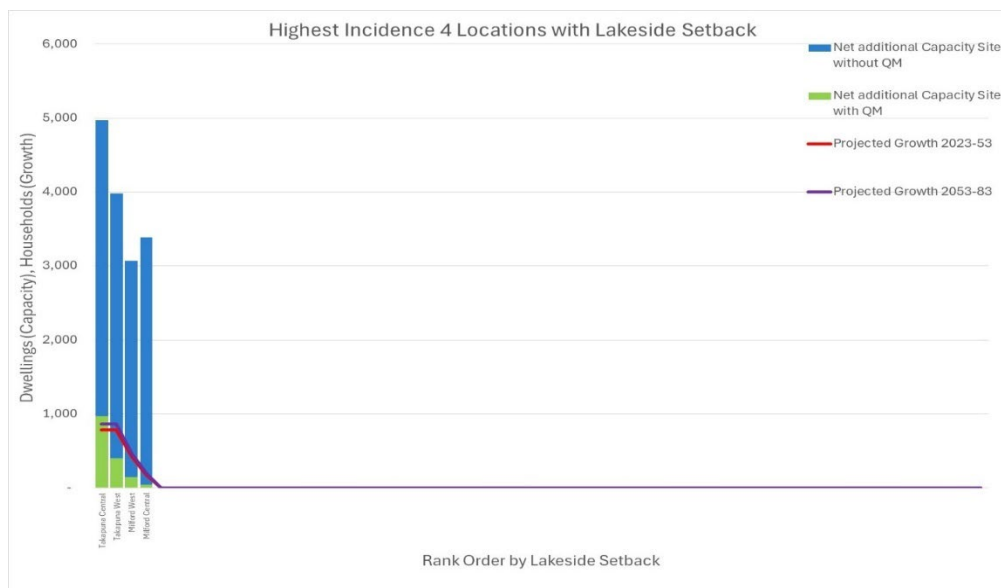
In the same markets where the incidence of Lakeside Setback as a QM is greatest, there is plan-enabled capacity for another 13,851 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 15,409 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for around 4% of total regional household growth.

Projected growth indicates 14% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 0.8% of Auckland’s total new dwelling consents in the 2017-24 period.

Table A-22 : Capacity & Site Parameters – SA2s with High Incidence of Lakeside Setback

Parameters of Lakeside Setback													
	Lakeside Setback Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 4 SA2s	196	4,319	1,558	13,851	15,409	4,266	3,058	1,208	2,242	2,167	14%	2,389	16%
Top 4 SA2s	196	4,319	1,558	13,851	15,409	4,266	3,058	1,208	2,242	2,167	14%	2,389	16%
Takapuna Central	133	1,035	971	4,000	4,971	5,750	4,028	1,723	602	782	16%	862	17%
Takapuna West	28	1,100	398	3,581	3,979	4,131	2,971	1,160	1,109	783	20%	863	22%
Milford West	25	1,298	145	2,924	3,069	2,647	2,048	599	232	425	14%	469	15%
Milford Central	10	886	44	3,346	3,390	4,724	3,295	1,430	299	177	5%	195	6%

Figure A-21: P-E Capacity and Projected Growth –Lakeside Setback



4.4.23 Strategic Transport Corridor Zone

The Strategic Transport Corridor Zone applies to 3,276 Residential zoned sites, and 1,412 Business zoned sites, with total plan-enabled capacity for 35,736 (Residential) and 85,792 (Business) net additional dwellings respectively, or 121,528 in total. For sites in WC and Policy 3(d) locations total plan-enabled capacity is for 21,262 (Residential) and 67,360 (Business) net additional dwellings for 88,622 in total. That represents 4.3% of Auckland’s total plan-enabled capacity.

In the same markets where the incidence of Strategic Transport Corridor Zone as a QM is greatest, there is plan-enabled capacity for another 378,061 additional dwellings on Residential zoned sites which are not affected by this Overlay, with capacity for 399,323 dwellings across all Residential zoned sites. If all of this plan-enabled capacity were feasible to develop in the 2023-53 long term, that would provide for more than total regional household growth.

Projected growth indicates 17% of the capacity in these markets could be taken up in the 2023-53 future. These markets accounted for 17% of Auckland’s total new dwelling consents in the 2017-24 period.

As with the Airspace Restriction provisions and the National Grid Corridor, the Strategic Transport Corridor Zone is a technical overlay relating to the safe and efficient functioning of the city.

Table A-23 : Capacity & Site Parameters – SA2s with High Incidence of Strategic Transport Corridor

Parameters of Strategic Transport Corridor													
	Strategic Transport Corridor Sites with QM	Existing Dwellings Total Sites	Net additional Capacity Sites with QM	Net additional Capacity Sites without QM	Net additional Capacity Total Sites	Mean Capital Value Total Sites	Mean Land Value Total Sites	Mean Improvement Value Total Sites	Dwellings Consented 2017-24	Projected Growth 2023-53	Projected Growth 2023-53 as % Capacity	Projected Growth 2053-2083	Projected Growth 2053-2083 as % Capacity
Total Auckland 95 SA2s	1,133	86,162	21,262	378,061	399,323	1,818	1,265	552	42,900	69,673	17%	76,818	19%
Top 25 SA2s	697	25,367	8,872	121,096	129,968	1,447	1,022	424	10,834	21,177	16%	23,346	18%
Homai Central	54	879	608	2,929	3,537	1,102	727	375	555	463	13%	510	14%
Mount Albert North	49	1,420	759	9,553	10,312	2,064	1,554	510	344	2,029	20%	2,237	22%
Takanini West	45	805	725	4,979	5,704	1,214	787	428	448	418	7%	461	8%
Kingstand	38	961	457	1,532	1,989	1,765	1,392	373	276	391	20%	431	22%
Manurewa East	37	888	410	4,753	5,163	1,089	748	342	491	619	12%	682	13%
Manurewa South	31	771	328	4,288	4,616	1,149	796	353	384	414	9%	456	10%
Rāhui Domain	30	1,047	230	4,315	4,545	989	692	297	603	894	20%	986	22%
Sunnynook South	29	781	491	5,318	5,809	1,446	1,100	347	242	1,143	20%	1,260	22%
Puhinui South	29	722	143	1,173	1,316	1,151	696	455	205	109	8%	120	9%
Āwhairaka West	28	1,350	265	3,912	4,177	1,946	1,296	650	1,008	669	16%	738	18%
Pinehill North	27	675	311	5,496	5,807	1,945	1,099	846	364	697	12%	768	13%
Conifer Grove East	26	719	361	4,319	4,680	1,096	822	274	168	543	12%	599	13%
Mount Wellington Central	26	850	478	4,306	4,784	1,659	1,245	414	592	468	10%	516	11%
Totara Vale North	26	1,016	396	3,747	4,143	1,328	931	396	234	815	20%	899	22%
Papatoetoe North	25	1,445	221	3,242	3,463	1,278	903	375	465	681	20%	751	22%
West Harbour West	23	1,421	405	6,800	7,205	1,132	848	284	499	1,418	20%	1,563	22%
Mount Albert Central	22	1,207	259	6,118	6,377	2,510	1,829	681	316	1,173	18%	1,293	20%
New Lynn North West	21	1,141	470	7,433	7,903	1,401	834	567	461	1,555	20%	1,714	22%
Papatoetoe West	20	1,138	392	6,867	7,259	1,328	941	387	462	1,428	20%	1,574	22%
New Windsor East	20	729	269	1,884	2,153	1,381	1,049	331	194	424	20%	467	22%
Rāhui South West	19	895	16	2,719	2,735	982	609	373	614	538	20%	593	22%
Avondale South (Auckland)	19	1,483	232	6,678	6,910	1,465	1,061	403	778	1,360	20%	1,499	22%
Henderson West	19	898	103	6,218	6,321	1,257	862	396	429	903	14%	996	16%
Morningside (Auckland)	18	1,279	295	5,938	6,233	2,040	1,521	519	356	1,227	20%	1,353	22%
Māngere Central	16	847	248	6,579	6,827	1,201	931	269	346	798	12%	880	13%

Figure A-22: P-E Capacity and Projected Growth –Strategic Transport Corridor

