



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

to the Auckland Unitary Plan (Operative in part)

SECTION 32 OF THE RESOURCE MANAGEMENT ACT 1991

H25 SPECIAL PURPOSE- HEALTHCARE FACILITY AND HOSPITAL ZONE

H29 SPECIAL PURPOSE- SCHOOL ZONE

H30 SPECIAL PURPOSE- TERTIARY EDUCATION ZONE

EVALUATION REPORT

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1. Executive Summary

1. This report discusses the implications of applying Policy 3 of the National Policy Statement on Urban Development 2020 (NPS-UD) as amended by the Resource Management (Consenting and Other System Changes) Amendment Act 2025 to Chapter H- Special Purpose Zones, in the Auckland Unitary Plan (Operative in Part) (AUP).
2. The Auckland Housing Planning Instrument (PC120) defines walkable catchments, provides for growth in the right places and applies qualifying matters that restrict height and density.
3. The purpose of section 32 of the RMA is to ensure all proposed plans, and changes to them are robust, evidence-based and represent the best means to achieve the purpose of the RMA.
4. Special Purpose Zones, including Special Purpose- Major Recreation Facilities Zone are not business zones under the AUP and have no residential component, so as such do not contribute to housing and/or business capacity.
5. The Special Purpose zones affected by the NPS-UD are:
 - H25 Special Purpose- Healthcare Facility and Hospital Zone
 - H29 Special Purpose- School Zone
 - H30 Special Purpose- Tertiary Education Zone

Building height limits are increased to 22m to inside walkable catchments to support the implementation of NPS-UD Policy 3 for relevant Special Purpose Zones through this plan change.

2. Introduction

6. Plan Change 120 has two key objectives- it proposes:
 - Measures to better manage significant risks from natural hazards region-wide; and
 - An amended approach to managing housing growth as a result of no longer incorporating the medium density residential standards (MDRS), but providing for intensification in a way that complies with clause 4 of Schedule 3C of the RMA by:
 - providing for at least the same amount of housing capacity as would have been enabled if Plan Change 78: Intensification (PC78), as notified, was made operative, including by providing for additional intensification along selected Frequent Transit corridors and modifying zoning in suburban areas through an amended pattern of Residential-Mixed Housing Urban and Mixed Housing Suburban zones;
 - enabling the building heights and densities specified in clause 4(1)(b) and (c) of Schedule 3C of the RMA within at least the walkable catchments of Maungawhau (Mount Edent), Kingsland, Morningside, Baldwin Avenue and Mount Albert Stations;
 - giving effect to Policy 3(c) and (d) of the National Policy Statement on Urban Development 2020 (NPS-UD) through intensification in other walkable catchments and land within and adjacent to neighbourhood town and local centres;
 - enabling less development than that required by clause 4(1)(b) and (c) of Schedule 3C or Policy 3 of the NPS-UD where authorised to do so by clause 8 of schedule 3C.
7. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the Resource Management Act 1991 (**RMA**) for proposed Plan Change 120 Housing and Intensification (**PC120**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
8. The background to and objectives of PPC120 are discussed in the overview report, as is the purpose and required content of section 32 and Schedule 3C evaluations.
9. This report discusses the implications of:
 - Giving effect to Policy 3(c) by enabling up to six storey development in specified locations.
 - Giving effect to Policy 3(d) by enabling densities and heights commensurate to the level of commercial activities and services in areas within and adjacent to neighbourhood, local and town centre zones.
 - Making consequential changes as necessary to support the implementation of the RMA.
 - Noting that Special Purpose Zones fulfil social, cultural, educational and health functions. They are not business or residential zones that contribute to housing or business capacity.
10. The Council has made changes to the building height requirements under Policy 3 of the NPS-UD. These changes provide the context for reviewing the height limits in the Special

Purpose Zones. This has resulted in height increases to some Special Purpose Zones in response to Policy 3 of the NPS-UD.

11. The building height requirements under Policy 3 relate to ‘walkable catchments’, The government requires councils to establish the scope of walkable catchments. This information on walkable catchment is in the section 32 overview report and are shown on Council’s GIS maps. This is the basis for all references to walkable catchments in this Section 32 report.

3. Section 32 evaluation

12. Section 32 of the Act 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 Act, 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.

4. The evaluation approach

13. This section outlines how the Special Purpose zones have been evaluated. The rest of this report will follow the evaluation approach described in the table below. In accordance with section 32(6) of the RMA and for the purposes of this report:
 - i. The ‘proposal’ means the changes to the Special Purpose Zone;
 - ii. The ‘objectives’ means the objectives; and
 - iii. The ‘provisions’ means the standards.

Sections of this report	Evaluation Approach
Section 2: Overview and Purpose	Explains the legislative background and purpose of this section of the Auckland Housing Planning Instrument. This section outlines the reasons for the Replacement Plan Change, the scope of changes and provides an overview of proposed changes.
Section 3: Issues	Explains the resource management issues and why there is a need to resolve them. It also addresses the scale and significance of the issues.

Section 4: Development and evaluation of options	In accordance with section 32(1)(b) and (2) of the RMA, this section examines whether the options appropriately achieve the objectives of the AUP(OP) and the sustainable management purpose of the RMA. The options are assessed by their efficiency and effectiveness, costs, benefits, and risks to resolve the RMA issue.
Section 5: Development of the plan change	This part of the report outlines the proposed provisions for Special Purpose Zones within PPC120
Section 6: Conclusion	Concludes that PPC120 is the most efficient, effective and appropriate means of addressing the resource management issues identified.

5. Overview and purpose

14. The following section sets out the legislative context behind PPC120 and provides an overview of the proposed amendments in response to key legislative drivers. In summary, the key legislative drivers of the PPC are to:

- Give effect to Policy 3c and 3d as per Schedule 3B of the RMA; and
- Give effect to Policy 3c and 3d, Schedule 3B of the RMA.

The RMA requires Auckland as a tier 1 territory to give effect to policy 3c and policy 3d which reads as follows:

***Policy 3:** In relation to tier 1 urban environments, regional policy statements and district plans enable:*

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

(i) existing and planned rapid transit stops:

(ii) The edge of city centre zones.

(iii) the edge of metropolitan centre zones; and

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

6. A high-level summary of scope of PPC 120

15. PPC120 is

16. PPC120 is part of an integrated package of changes to implement and incorporate intensification provisions of the RMA into the AUP(OP). I refer to the Section 32 reports for the plan change overview, and the Section 32 reports for Policy 3 intensification as providing broader context for the Auckland Housing Planning Instrument. These reports provide

comprehensive information on the national and regional contexts. They also include the rationale for the proposed building heights in walkable catchments. This Section 32 report refers to the 22m height to correlate with the 'at least 6 storey' height limit proposed for the residential Terrace Housing and Apartment Building Zone and most business zones inside walkable catchments. The height of 22m is explained in Attachment 1. This evaluation applies this height limit in the analysis of building height for the Special Purpose Zones.

7. Issues

8. Implementation of the National Policy Statement on Urban Development

17. The National Policy Statement on Urban Development ('NPS-UD') came into effect on 20 August 2020. It was subsequently updated in May 2022.
18. The Resource Management (Consenting and Other System Changes) Amendment Act came into force on 21/08/2025. Schedule 1 Clause 4(1)(a) of the Act provides that Auckland Council may withdraw PC78 under the following circumstances:
"(1) Auckland Council must amend the Auckland Unitary Plan to-
(a) provide at least the same amount of housing capacity that would have been enabled if Plan Change 78 (as notified) were made operative; and
(b) enable, within at least a walkable catchment of the Maungawhau (Mount Eden), Kingsland, and Morningside Stations,-
(i) heights and densities commensurate with the greater of-
(A) demand for housing and business uses in those locations; or
(B) the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations; and
(ii) in all cases, building heights of at least 15 storeys in those locations; and
(c) enable, within at least a walkable catchment of the Baldwin Avenue and Mount Albert Stations-
(i) heights and densities commensurate with the greater of-
(A) demand for housing and business use in those locations; or
(B) the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations; and
(ii) in all cases, building heights of at least 10 storeys in those locations; and
(d) give effect to policy 3.
(2) However, Auckland Council may amend the Auckland Unitary Plan to enable less development than that required by subclause (1)(b) or policy 3 if authorised to do so by clause 8."
19. The NPS-UD is about ensuring New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities. It seeks to remove overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure.
20. This section 32 report covers the council's response to the directions in Policy 3(c) and 3(d) of the NPS-UD.

Policy 3 of the NPS-UD

21. The NPS-UD (updated May 2022 version) directs the council to enable intensification in specific areas within Auckland (a tier 1 urban environment) as shown below.

“Policy 3: In relation to tier 1 urban environment, regional policy statements and district plans enable:

- (a) In the city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and
- (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; and
- (c) Building heights of at least 6 storeys within at least a walkable catchment of the following:
 - (i) Existing and planned rapid transit stops.
 - (ii) The edge of city centre zones
 - (iii) The edge of metropolitan centre zones; and
- (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.”

Requirement to implement the NPS-UD

22. Section 55 of the RMA requires the council to amend its Regional Policy Statement (‘RPS’) and district/regional plans so that they can give effect to any provision in a national policy statement that affects the document.

23. Policy 3 is a list of directives for Tier 1 council as to how their plans need to enable heights and density of urban form in specific areas. These directions are mandatory and therefore the council cannot consider other options (i.e. not enable the required intensification in the AUP). The council must simply implement the higher-level directives.

24. **Table 1** below summarises the different levels of intensification required to be enabled in the different sub-parts (a)-(d) of Policy 3.

Area for intensification	Mandated intensification direction	
In city centre zones-provisions now operative	Heights	Density of urban form
	To realise as much development capacity as possible	To realise as much development capacity as possible
In metropolitan centre zones – IHP decision pending	Reflect demand for housing and business use in those locations, and in all cases building heights of at least six storeys	Reflect demand for housing and business use in those locations
Within walkable catchments	At least six storeys	N/A

Within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent)	Commensurate with the level of commercial activity and community services	Commensurate with the level of commercial activity and community services
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25. While the overall implementation of Policy 3(c) and 3(d) is not a matter of choice for the council, the wording of Policy 3 does give the council scope as to *how* the policies are implemented. The City Centre and Metropolitan Centre zones are outside the scope of this Plan Change. The different options as to how to apply Policy 3(c) and 3(d) to the AUP are outlined further in the development of options section below.

9. Interpretations and Explanations

26. The term ‘walkable catchments’ is referred to in this Section 32 report and the proposed changes to the AUP. Policy 3(c) of the NPS-UD 2020 requires Council to identify ‘walkable catchments’ where building heights of at least six 10 and 15 storeys will be enabled. The methodology for how walkable catchments have been applied are discussed in the Intensification s32 report.
27. The Auckland Plan and the RPS support the highest intensity in the City Centre, then metropolitan centres, town, local and neighbourhood centres. Auckland Council proposes walkable catchments of 1200m around the city centre and 800m around metro centres, town centres or Rapid Transit Network stops. These are areas where people can live within walking distances to everyday things like work, shops, community services, or to catch a bus or train to get around.
28. Interpretation and explanations of ‘building height’s and ‘at least six storey’s and ‘density or urban form’ are provided in Attachment 1. These are covered in more detail in the residential and business s32 report (policy 3) and related technical reports.

10. Problem Definition

29. Policy 3 of the NPS-UD applies in relation to ‘tier 1 urban environments. The NPS-UD defines ‘urban environment’ as:
30. *“Any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:*
- Is, or is intended to be, predominantly urban in character.*
 - And is or is intended to be, part of a housing and labour market of at least 10,000 people.”*
31. There are a number of ways in which this definition could be interpreted as applying to Auckland. Auckland Council has interpreted this to mean that for Auckland the “urban environment” is:
32. All land zoned residential, business and adjoining special purpose zones and open space zones as identified in the AUP, including the Hauraki Gulf Island Section, which includes metropolitan Auckland, all towns, and all rural and coastal towns and villages.
33. The Special Purpose Zones manage activities, development and built form in zones providing social infrastructure and other activities that require specific provisions to support

activities. Social infrastructure requiring specific provisions includes cemeteries, tertiary education facilities, schools (independent and integrated), Māori purposes, recreation facilities, healthcare and hospitals. There are also special purpose zones for quarries, airports and airfields as these activities have specific functional and operational requirements. These zones do not contribute to Auckland's overall housing and business capacity but fulfil specific requirements for education, social, education, cultural, health, mining and transport requirements.

Assessment to determine applicable Special Purpose Zones for plan change.

34. The eight Special Purpose Zones cover a diversity of sites, locations and activities. Not all Special Purpose Zones are affected by recent legislation. Only those Special Purpose zones affected by Policy 3(c) and 3(d) are updated and included in this plan change. This may be for one or more of the following reasons:
- There are no height limits specified in the Special Purpose Zone (for instance, height limits may be managed through precinct provisions rather than the Special Purpose zone¹); or
 - The Special Purpose Zone may not be located inside walkable catchments or Policy 3(c) or 3(d) locations or in other geographic locations specifically mentioned in legislation.
 - The increased residential height limits proposed for walkable catchments are commensurate or higher than the existing Special Purpose Zone heights and additional height is not considered; or
 - The activity may not be relevant to Policy 3.
35. The assessment criteria for determining whether Policy 3 enabled height limits are relevant to a Special Purpose zone are applied to each zone in the table below.
36. **Table 2:** Assessment of Special Purpose Zones to determine qualification for Policy 3 changes to height limits. 'Not applicable' (N/A) is applied where the zone does not have building height limits or is not inside a walkable catchment. It should be noted that the height of THAB outside walkable catchments is proposed to increase to 22m.

Special Purpose Zones (SPZ)	Are there building height limits in the SPZ?	Are SPZ inside a walkable catchment/Policy 3(c) or 3(d) area or specifically covered in legislation?	Are the lowest height limits commensurate or higher than the w/c height limits?	Would additional height enabled in w/c applied to a SPZ support Policy 3 objectives?	Relevant for plan change
H23 Special Purpose- Airports and Airfields Zone	Yes	No	N/A	N/A	No

¹ The Special Purpose Major Recreation Facilities Zone does not have a height limit, this is specified in precinct provisions.

H24 Special Purpose- Cemetery Zone	Yes	Yes- Waikumete Cemetery	No	No	No
H25 Special Purpose Healthcare Facility and Hospital Zone	Yes	Yes various	No	Yes	Yes
H26 Special Purpose- Major Recreation Facility Zone	No	Yes- Eden Park	N/A	N/A	No
H27 Special Purpose- Māori Purpose Zone	Yes	No	N/A	N/A	No
H28 Special Purpose Quarry Zone	Yes	No	N/A	N/A	No
H29 Special Purpose- School Zone	Yes	Yes- multiple sites	No	Yes	Yes
H23 Special Purpose – Tertiary Education Zone	Yes	Yes- Unitec only	No	Yes	Yes

37. The zones not affected by Policy 3 are:

- H23 Special Purpose – Airports and Airfields Zone
- H24 Special Purpose- Cemetery Zone
- H26 Special Purpose-Major Recreation Facility Zone*
- H27 Special Purpose- Māori Purpose Zone
- H28 Special Purpose- Quarry Zone

38. The Special Purpose zones affected by Policy 3 are the subject of a height limit review in this s32 report. This is to determine whether existing Special Purpose Zone heights should be increased to be commensurate with the surrounding residential or business zones inside walkable catchments and to support growth in these areas. * Eden Park is located within the Kingsland walkable catchment that is proposed to increase height in the surrounding Residential THAB land to 50m in height. However, Eden Park has recently been granted resource consent enabling height greater than 50m. It would make more sense for the

overall design, location and bulk of buildings to be assessed individually, given the scale of that site, rather than applying a blanket 50m height that may otherwise cause visual dominance, shading and loss of privacy.

39. The economic analysis supporting this overall plan change concludes that additional height is not required for residential or business purposes in these locations.
40. The Economy Matters s32 report discusses capacity for PC120.
41. The assessment shows that the following Special Purpose zones qualify for inclusion in PC 120 are:
 - H25 Special Purpose-Healthcare Facility and Hospital Zone
 - H29 Special Purpose- School Zone
 - H30 Special Purpose- Tertiary Education Zone

11. Scale and significance

42. Section 32(1)(c) of the RMA states that the level of detail contained in a section 32 evaluation report is required to correspond to the scale and significance of the effects that are anticipated from the implementation of the proposal.
43. For the purposes of section 32(1)(c):
 - (a) Scale refers to the scale or reach of the issue (for example geographical area), the anticipated size or magnitude of the expected effects from the proposal, or both; and
 - (b) Significance relates to the importance or impact of the issue (on the environment and/or on the community) that the proposal is intended to respond to, or the significance of the response itself (on the environment and community) i.e. whether it is at a regional or local.
44. The scale and significance of the relevant chapters of the AUP(OP) must be determined to guide the level of the analysis required for the Section 32 assessment.
45. The analysis of Special Purpose Zones has shown the scale and significance of the issues is assessed to be minor.

12. Development and Evaluation of Options

13. Description of options

46. In the development of the preferred approach set out in PPC120, a number of options were identified. This followed a review of the AUP(OP), and identification of the changes required in order to achieve the requirements of the Act namely to give effect to Policy 3c (heights of at least 6 storeys) and Policy 3d (increase heights and densities in appropriate locations) of the NPSUD. This report evaluates how increases to building height limits in the relevant Special Purpose Zones where they occur inside and outside the walkable catchments can be implemented.
47. The options evaluated are:
48. (a) Retain status quo- rely on the existing zones and provisions within Special Purpose zones that are not in conflict with Policy 3(c) and (d).
49. (b) Amend the relevant Special Purpose zones to incorporate Policy 3(c) and (d) with new height limits within walkable catchments to achieve a quality-built environment, enable growth and facilitate good design outcomes. In some cases, the walkable catchment heights

enabled in business and residential zones in specific locations may be 10 or 15 storeys in height. However, matching the heights of surrounding residential and business land is not required to be achieved to meet housing and business capacity requirements.

14. Methodology

- 50. PC 120 was developed in response to the identification of the built form height established by the Quality Built Environment workstream (formed by planners, urban designers, architects and specialists on specific topics). The key matters relevant to the scope and focus of the Special Purpose Zone was defined as follows:
- 51. To apply the intensification provisions of the NPS-UD while achieving the following outcomes:
- 52. Outcome 1- enable up to 22m (six storeys) in relevant Special Purpose Zones inside walkable catchments.
- 53. Method: The provisions for each Special Purpose zone were evaluated to determine the scope for increased height inside walkable catchments up to six storeys (22m) and to review whether the heights needed to be altered outside walkable catchments.
- 54. Outcome 2: Manage dominance and shading effects on the street and adjoining sites.
- 55. Method: Retain existing standards including yards, height in relation to boundary and building coverage in the relevant Special Purpose Zone to manage the scale of buildings and effects of their proximity to boundaries. Assessment criteria for evaluating consents are also retained without change.

15. Options and summary of evaluation

- 56. Each Special Purpose Zone is evaluated separately. A summary analysis of the proposed option and provisions is included at the end of each zone analysis.

H25 Special Purpose- Healthcare Facility and Hospital Zone

- 57. The Special Purpose- Healthcare Facility and Hospital Zone applies to several of Auckland's hospitals and healthcare facilities. These are generally large, land-extensive facilities with a range of activities related to their primary function. The sites generally consist of extensive and highly visible buildings and substantial parking areas. The zone enables a range of healthcare related and supporting activities to cater for the diverse requirements of the users, employees and visitors to the hospitals and healthcare facilities.
- 58. The H25.2 objectives are:
 - (1) The efficient operation and development of hospitals and healthcare facilities to support the community's healthcare needs is enabled.*
 - (2) A comprehensive range of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities are provided for.*
 - (3) The adverse effects of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities on adjacent areas are avoided, remedied or mitigated.*
- 59. These objectives are supported by a series of policies that address built form. The relevant H25.3 policies are:

(4) Minimise significant adverse effects of overshadowing, visual dominance and loss of visual privacy on adjacent properties by use of graduated building heights and by locating higher buildings away from the zone boundary.

(5) Provide for additional building height in identified locations, where it:

(a) enables the efficient operation of the hospital or healthcare facility; and

(b) can be accommodated without significant adverse effects on adjacent properties.

(6) Require new buildings and significant additions to buildings that adjoin streets and public open spaces to be designed to contribute to the maintenance and enhancement of amenity values while enabling the efficient use of the site.

(7) Encourage new buildings to be designed to provide a high standard of amenity and safety.

60. Table H25.6.1.1 sets out the building heights within the zone. These height limits were developed to provide for the activity and in consideration of activities and heights in adjacent zones. Policy 3(c) provides for intensification in and around town centres. Policy 3(d) allows for an increase in heights for sites adjacent to and adjoining local centres. This presents an opportunity to increase height limits for Special Purposes- Healthcare and Hospital Zone where sites are located inside Policy 3(c) walkable catchments. Table H256.1.1 shows the current building heights for this zone.

61. Sites with a 'total site area up to 4ha' are restricted to 16m for permitted activities and between 16-25m for Restricted Discretionary (RD) activities. It is proposed that sites with a 'total site area up to 4ha' inside walkable catchments be increased to a building height limit of 22m for permitted development and to between 22m-25m for RD consents. This will enable greater capacity to be achieved, consistent with the NPS-UD policy direction. The zone enables non-residential, healthcare facilities and therefore does not need to replicate the same heights as the residential zones. The activities undertaken within the zone support communities but do not contribute to housing and business land capacity. The specific requirements of healthcare facilities are bespoke and may require additional height in particular locations only. Standards including Yards and Height in Relation to Boundary that also manage built form and its proximity to boundaries will not be changed.

Table 3

H25.6.1.1- Building heights

Site area	Permitted Activity Standard	Restricted Discretionary Activity Standard	Discretionary Activity Standard
Sites with a total site area up to 4ha	Up to 16m	Between 16m and up to 25m	Greater than 25m
Sites with a total site area greater than 4ha	Up to 26m	Between 26m and up to 35m	Greater than 35m

Site area	Permitted Activity Standard	Restricted Discretionary Activity Standard	Discretionary Activity Standard
Sites subject to the Height Variation Control	Up to the height specified on the HVC	Infringements to the HVC and up to 35m	Infringements to the HVC and greater than 35m
Auckland Hospital Buildings	Up to the height specified in Figure H25.6.1.1	Buildings infringing the height specified in figure H25.6.2.1 and up to 35m	Buildings infringing the height specified in Figure H25.6.1.1 and greater than 35m

62. The Special Purpose- Healthcare Facility and Hospital Zone applies to several of Auckland's hospitals and healthcare facilities. There are four major hospitals within walkable catchments and several smaller private providers too:

- North Shore Hospital.
- Waitakere Hospital.
- Auckland Hospital; and
- Middlemore Hospital.
- Several Healthpoints (private clinics utilising the zone) e.g. 119 Apollo Drive Rosedale

63. North Shore Hospital located at 132 Shakespeare Road Takapuna within the Smales Farm walkable catchment. The site has existing HVCs of 15m, 25m and 75m respectively over the site. The QMs identified for that site include: HVC, Airspace Restriction Designation, Outstanding Natural Features Overlay, Significant Ecological Areas and flood plains.

64. Waitakere Hospital located at 55-75 Lincoln Road is mostly located inside the Henderson walkable catchment. However, the northern portion of the site adjoins Residential THAB on Lincoln Road of 50m and Residential MHU land on Woodford Ave of 11m height. The QMs identified for that site include: HVC, notable trees overlay, flood plains.

65. Auckland Hospital is located at 2 Park Road, Grafton Auckland. It is located within the City Centre/Newmarket Walkable catchment. The QMs that apply to the site are sites and places of significance to mana whenua overlay and flood plains. There are already bespoke provisions within this zone that enable specific heights across the site that recognise the future development potential of sites.

66. Middlemore Hospital located at 100 Hospital Road; Middlemore is located within the walkable catchment. The QMs that apply to that site include Airspace Restriction Designation, Coastal Inundation, Significant Ecological Areas, Flood Plains, National Grid Corridor Overlay, Coastal erosion.

67. Most of the other Healthpoint businesses utilising this Special Purpose Zone are low-scale, privately owned hospitals or clinics typically of 1-3 storeys in height.

Table 4: Evaluation of options for H25 Special Purpose- Healthcare Facility and Hospital Zone

Option Evaluation: H25 Special Purpose- Healthcare Facility and Hospital Zone		
	Option 1 Retain status quo	Option 2 Include new 22m building height limit inside

		walkable catchments in Plan Change 120
Appropriateness	Does not allow for potential growth and change to built form consistent with that enabled by Policy 3 inside walkable catchments to support a quality-built environment.	Provides for growth and change to built form height consistent with that enabled by Policy 3 inside walkable catchments to support a quality-built environment.
Effectiveness	Does not enable additional intensification or give effect to Policy 3.	Enables intensification and gives effect to the requirements of Policy 3 by enabling up to six storeys (22m) inside walkable catchments. This land is used for non-residential use.
Efficiency	A low/no cost option but not efficient as the issue of capacity is not addressed. There is potentially a loss as this zone would not achieve the land use and resource efficiencies enabled by Policy 3.	Clarity for plan users because provisions for development inside walkable catchments and the amenity and growth expectations are clear and can be applied to support land use and resource efficiency.
Costs	A low/no cost option but not efficient as the issue of capacity and is not addressed. There is potentially a loss as this zone would not achieve the land use and resource efficiencies enabled by Policy 3.	Low-cost option. Risk of poor or inconsistent design outcomes with higher buildings such as: limited privacy, building dominance and shading to the street or adjoining sites. The existing provisions include effective policies, standards (including Height in Relation to Boundary) and assessment criteria to manage effects and ensure quality design outcomes.
Benefits	Existing provisions are well understood and effective at producing quality-built form outcomes.	Successfully achieves greater intensification to support the activity without compromising the quality-built environment. Change to the height limit will continue to enable consistent, good design outcomes which achieves a high-quality built environment. This zone does not require the same heights as surrounding residential land and is non-residential in nature i.e. it

		does not contribute to the supply of residential or business land.
Risks	Lost opportunity to enable more capacity to support growth (enabled by NPS-UD), less of land-use and resources and a built form that is inconsistent with adjacent sites in walkable catchments.	May not deliver sufficient development opportunities in key locations. Poor design outcomes/compromised built form quality.

Summary of Evaluation

68. The evaluation shows that increasing the building height to 22m inside all walkable catchments will deliver on Policy 3 and will have benefits that outweigh the costs. The existing objectives, policies and standards will continue to support quality-built form outcomes.

H26 Special Purpose- Major Recreation Facility Zone

69. The Special Purpose- Major Recreation Facility Zone applies to several of Auckland's large-scale sports, leisure and multi-functional sites. These recreation facilities are limited resources that contribute to Auckland's cultural profile and includes sports arenas, showgrounds, events centres, racecourses, motor-racing tracks, the Auckland Zoo, MOTAT. In many cases they contain extensive and highly visible buildings, substantial parking areas and significant areas of open space. Some are the home for organisations such as sporting franchises, regional and national sporting organisations, heritage organisations and conservation organisations. Others are the base for high-performance athletes and their support facilities and services.
70. There are currently 20 facilities within the Special Purpose-Major Recreation Facility Zone. Each facility is also contained within a precinct with bespoke standards which are specific for each existing facility. The zone contains general objectives and policies which guide and operation and development of sites.
71. The zone enables a range of multi-functional sites with indoor visitor capacity exceeding 1000 or the overall ability to accommodate over 10,000 visitors.
72. The H26.2 objectives are:
- (1) Major recreation facilities are protected and enabled to provide for the social and economic well-being of people and communities.*
 - (2) Adverse effects generated by the operation, development, redevelopment and intensification of major recreation facilities are avoided, remedied or mitigated as far as is practical.*
 - (3) Major recreation facilities are protected from the reverse sensitivity effects of adjacent activities.*

73. These objectives are supported by a series of policies that address built form. The relevant H26.3 policies are:
- (3) Discourage activities that may give rise to adverse effects on:*
 - (a) the function, role, or amenity of any metropolitan, town or local centre beyond those effects ordinarily associated with trade effects on trade competitors; and*
 - (b) the safe and efficient operation of the transport network*
 - (4) Avoid, remedy or mitigate the adverse effects of major recreation facilities on adjacent development.*
 - (5) Enable the appropriate development and redevelopment of buildings whilst managing the adverse effects at the precinct interface.*
 - (6) recognise the potential for major recreation facilities to give rise to reverse sensitivity effects and require new activities that are likely to be sensitive to these effects generated within the precinct to manage the risk of generating reverse sensitivity effects.*
74. There are no activities in the Activities in H26.4 and no standards in the zone, the zone relies entirely on its precincts to provide tailored provisions.
75. The activities undertaken within the zone support communities but do not contribute to housing and business land capacity. The specific requirements of major recreation facilities are bespoke and may require additional height in particular locations only. No changes to the zone provisions are proposed through this plan change.

Evaluation of options for H29 Special Purpose- School Zone

76. The Special Purpose-school Zone applies to Auckland's independent and integrated schools and associated community facilities and is characterised by campus-style developments. The purpose of the zone is to allow the continued operation and further development of these schools and associated facilities. This zone does not apply to existing or future schools located in the city centre, metropolitan or town centres. Ministry of Education owned sites are subject to designations and are contained in Chapter K of the AUP.
77. The H29.1 objectives are:
- (1) The educational needs of school students are met, and the well-being of students, staff and visitors is provided for.*
 - (2) School activities, including the development of new schools and appropriate redevelopment, intensification and expansion of existing schools, are enabled.*
 - (3) Opportunities for communities to use school facilities, and for the co-location of school and community facilities are provided.*
 - (4) Adverse effects of schools, community facilities and associated activities and their use on adjacent areas are avoided, remedied or mitigated.*
78. The relevant H29.2 policies are:
- (1) Enable the efficient utilisation of school land, buildings and infrastructure.*
 - (3) Enable community use of the existing and future school land, buildings and infrastructure and the co-location of school and community facilities provided they:*
 - (a) do not compromise the use of the zone for school activities; and*
 - (b) avoid, remedy, or mitigate adverse effects on adjoining properties.*
 - (5) Minimise adverse effects on adjacent properties from development that causes overshadowing, visual domination, loss of visual privacy and loss of other amenity values by*

the use of building setbacks, screening, graduated building heights and by locating higher buildings away from the zone boundary.

(6) Provide for additional building height in identified locations where it:

(a) provides for the efficient use of the site; and

(b) can be accommodated without significant adverse effects on adjacent properties.

(7) Encourage new buildings to be designed to provide a high standard of amenity and safety.

(8) require new buildings and significant additions to buildings that adjoin streets and public open spaces to be designed to contribute to the maintenance and enhancement of amenity values while enabling the efficient use of the site.

79. Table H29.6.2.1 Building Height

Building Location	Maximum building height
Buildings less than 20m from a boundary with a site in residential zones (except the Residential-Terrace Housing and Apartment Buildings Zone), open space zones, or the Future Urban Zone	12m
Buildings greater than or equal to 20m from a boundary with a site in a residential zone (other than Residential-Terrace Housing and Apartment Buildings Zone) or open space zones, or the Future Urban Zone	16m
Buildings in all other locations	16m

80. There are multiple private schools across Auckland that utilise this zone. Several are located within walkable catchments. Some examples include:

- Diocesan School- 2 Erin St Epsom
- Dilworth School-27 Omaha St Remuera

81. Most schools have been developed with low-rise buildings of 1-3 storeys, expanding as they need to match increasing roll numbers. The examples of Diocesan and Dilworth have QMs including regional maunga viewshafts, Height and Building Sensitive Areas that would restrict height in these locations. Parity with surrounding business and residential zones is not strictly required where this land does not contribute to business or residential capacity.

82. The Special Purpose Zone-School Zone is a non-residential zone, with bespoke requirements. The nature of these sites mean that they are not occupied 24/7 and student borders in some schools are not full-time residents. This means that this zone is not required to contribute to residential (housing) or business capacity.

83. Evaluation of options for H29 Special Purpose-School Zone

Option Evaluation: H25 Special Purpose- School Zone		
	Option 1 Retain status quo	Option 2 Include new 22m building height limit inside all walkable catchments in Plan Change XX
Appropriateness	Does not allow for potential growth and change to built form consistent with that enables by Policy 3 inside	Provides for growth and change to built form height consistent with that enabled by Policy 3 inside walkable

	walkable catchments to support a quality-built environment.	catchments to support a quality-built environment.
Effectiveness	Does not enable additional intensification or give effect to Policy 3.	Enables intensification and gives effect to the requirements of Policy 3.
Efficiency	A low/no cost option but not efficient as the issue of capacity is not addressed. There is potentially a loss as this zone would not achieve the land use and resource efficiencies enabled by Policy 3.	Clarity for plan users because zone provisions for development inside walkable catchments and the amenity and growth expectations are clear and can be applied to support land use and resource efficiency.
Costs	A low/no cost option but not efficient as the issue of capacity and is not addressed. There is potentially a loss as this zone would not achieve the land use and resource efficiencies enabled by Policy 3.	Low-cost option. Risk of poor or inconsistent design outcomes with higher buildings such as: limited privacy, building dominance and shading to the street or adjoining sites. The existing provisions include effective policies, standards (including Height in Relation to Boundary) and assessment criteria to manage effects and ensure quality design outcomes. Private schools are largely low-scale (one to three storeys). Enabling up to 6 storeys in walkable catchments will provide the option of more height, if required.
Benefits	Existing provisions are well understood and effective at producing quality-built form outcomes.	Successfully achieves greater intensification to support the activity without compromising the quality-built environment. Change to the height limit will continue to enable consistent, good design outcomes which achieves a high-quality built environment. Heights in walkable catchments for business and residential zones may be higher but this is a non-residential zone, where the predominant building form is 1-3 storeys.

Risks	Lost opportunity to enable more capacity to support growth (enabled by NPS-UD), less of land-use and resources and a built form that is inconsistent with adjacent sites in walkable catchments.	May not deliver sufficient development opportunities in key locations. Poor design outcomes.
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Summary of evaluation

84. The evaluation shows that increasing the building height limit to 22m inside all walkable catchments will deliver on Policy 3 and have benefits that outweigh the costs. The existing objectives, policies and standards will continue to support quality-built form outcomes.

H30 Special Purpose- Tertiary Education Zone

85. The Special Purpose- Tertiary Education Zone applies to tertiary education facilities in locations where the surrounding zoning will not appropriately provide for the ongoing operation and development of the facilities or where the facilities are not subject to a precinct plan.
86. Generally, these are large facilities in campus-style developments, with extensive and highly visible buildings, substantial parking areas and significant area of private open space. Increasingly, business, offices, research and laboratory facilities are co-locating within these campuses, to the benefit of the tertiary institution, the students and the economic development of Auckland.
87. The purpose of the zone is to enable the development and operation of a range of activities to cater for the diverse requirements of the student population, employees and visitors. Community use of the facilities is also provided for.
88. The H30.2 objectives are:
- (1) Tertiary education facilities meet the education needs of their students, facilitate research and economic development, and provide for the well-being of employees, students and visitors.*
 - (2) Other activities which are compatible with, or accessory to, tertiary education facilities are provided for where they do not compromise the use of the zone for tertiary education purposes.*
 - (3) Adverse effects of tertiary education facilities and associated activities and their use on adjacent areas are avoided, remedied or mitigated.*
89. These objectives are supported by several policies that address built form. The relevant H30.3 policies are:
- (3) Require new buildings and significant additions to buildings that adjoin streets and public open spaces to be designed to contribute to the maintenance and enhancement of amenity values while enabling the efficient use of the site.*
 - (4) Encourage new buildings to be designed to provide a high standard of amenity and safety.*
 - (5) require screening or landscaping of waste management facilities, service areas and buildings and parking to enhance their appearance when viewed from adjacent residential zones, streets and public open spaces.*
 - (6) Provide for accessory and compatible activities to meet the needs of employees, students and visitors without undermining the function of nearby town centres as the primary location for business activities.*

(7) require new buildings to be designed in a manner that respects any adjacent scheduled historic heritage places on the site.

(8) Minimise significant adverse effects of overshadowing, visual dominance and loss of visual privacy on adjacent properties by use of graduated building heights and by locating higher buildings away from the zone boundary.

90. Table H30.6.1.1 Building Height

Building location	Maximum building height
Less than 20m from a site in the residential zones, the Future Urban Zone or an open space zone	12m
Greater than or equal to 20m from a boundary with a site in the residential zones, the Future Urban Zone or an open space zone	24m

91. The Special Purpose-Tertiary Education Zone has been applied in a couple of locations including 139 Carrington Road (Unitec), 53 Otara Road (MIT). The University of Auckland has its own precinct within the City Centre Zone so does not rely on this zone.
92. The Unitec campus along Carrington Road has its own precinct (Wairaka) with bespoke bulk and location requirements that were recently modified through Plan Change 94. That Plan Change is currently under appeal, but the plan change was promulgated by the Ministry of Housing and Urban Development with the aim of facilitating greater intensification, heights and density within the site, largely as a result of treaty settlement arrangements.
93. The outcome of the appeal is unknown at the time of writing this report.
94. The MIT site at 53 Otara Road and 5 Otara Road is located outside a walkable catchment and is not subject to any precinct provisions. (It is treated differently to the Auckland University of Technology Campus on Great South Road Manukau that is zoned General Business with its own precinct- I424 Manukau 2). The sites adjoin other School or Māori Special Purpose Zoned land and are located in close proximity to the Business Town Centre with an 18m HVC. The sites also adjoin parks zoned Open Space Active Sport and Recreation and THAB zone which will have a 22m height. The existing buildings are 1-2 storeys of around 11-13m in height. The immediate neighbourhood is spacious and low-scale.

95. Evaluation of options for H30 Special Purpose-Tertiary Education Zone

Option Evaluation: H30 Special Purpose- Tertiary Education Zone		
	Option 1 Retain status quo	Option 2 Include new 22m building height limit inside all walkable catchments in Plan Change 120
Appropriateness	Does not allow for potential growth and change to built form consistent with that enabled by Policy 3 inside walkable catchments to support a quality-built environment.	Provides for growth and change to built form height consistent with that enabled by Policy 3 inside walkable catchments to support a quality-built environment.

Effectiveness	Does not enable additional intensification or give effect to Policy 3.	Enables intensification and gives effect to the requirements of Policy 3. by enabling up to six storeys (22m) inside walkable catchments.
Efficiency	A low/no cost option but not efficient as the issue of capacity is not addressed. There is potentially a loss as this zone would not achieve the land use and resource efficiencies enabled by Policy 3.	Clarity for plan users because zone provisions for development inside walkable catchments and the amenity and growth expectations are clear and can be applied to support land use and resource efficiency.
Costs	A low/no cost option but not efficient as the issue of capacity and is not addressed. There is potentially a loss as this zone would not achieve the land use and resource efficiencies enabled by Policy 3.	Low-cost option. Risk of poor or inconsistent design outcomes with higher buildings such as: limited privacy, building dominance and shading to the street or adjoining sites. The existing provisions include effective policies, standards (including Height in Relation to Boundary) and assessment criteria to manage effects and ensure quality design outcomes.
Benefits	Existing provisions are well understood and effective at producing quality-built form outcomes.	Successfully achieves greater intensification to support the activity without compromising the quality-built environment. Change to the height limit will continue to enable consistent, good design outcomes which achieves a high-quality built environment, in keeping with the planned built character of the walkable catchment.
Risks	Lost opportunity to enable more capacity to support growth (enabled by NPS-UD), less of land-use and resources and a built form that is inconsistent with adjacent sites in walkable catchments.	May not deliver sufficient development opportunities in key locations. Poor design outcomes.

Summary of evaluation

96. The evaluation shows that increasing the building height limit in locations 'less than 20m from a site in the residential zones, the Future Urban Zone or an open space zone from 12m

to 22m where they are located inside all walkable catchments has benefits that outweigh the costs. The existing objectives, policies and standards will continue to support quality-built form outcomes. This Special Purpose Zone is not required to provide for additional height to achieve residential or business capacity. Its non-residential use means that some additional height within walkable catchments will be beneficial but raising heights to 22m everywhere may not adequately manage the interface with lower height and density zones such as Residential Mixed Housing Urban.

16. Development of the plan change

97. Option 2 in the evaluation has been selected as the preferred option as it will enable buildings of at least 22m (6 storeys) in all walkable catchments within the relevant Special Purpose Zone. This will increase height, capacity and density in appropriate locations to achieve a quality-built environment. The changes proposed occur only in the Building Height tables. Additional height is not considered necessary because the Special Purpose Zones are neither required for residential nor business capacity. Several Special Purpose Zones have bespoke HVCs already over sites that recognise the likely future operational requirements of these sites.

98. The following table summarises the findings from the option and evaluation analysis.

Summary of the proposed key changes to Special Purpose zones

Summary of proposed key changes to Special Purpose Zones				
Proposal	Reason (s)	Give effect to Policy 3 to provide building heights of at least 6 storeys within a walkable catchment	Give effect to Policy 3(c) and (d)	Consequential changes
H25 Special Purpose- Healthcare Facility and Hospital Zone				
Increase building heights in walkable catchments to 22m	Enable development of 22m (6 storeys) within walkable catchment through amendments to building height.	Yes	Yes-only as it relates to development inside all walkable catchments	No
H29 Special Purpose- School Zone				
Increase building heights inside walkable catchments to 22m	Enable development of 22m (6 storeys) within walkable catchment through	Yes	Yes- only as it relates to development inside all walkable catchments	No

	amendments to building height			
H30 Special Purpose-Tertiary Education Zone				
Increase building heights in walkable catchment to 22m	Enable development of 22m (6 storeys) within walkable catchment through amendments to building height	Yes	Yes- only as it relates to development inside all walkable catchments	No

99. The new building heights inside walkable catchments will be specified within the building height tables for each Special Purpose Zone.

Provisions for H25 Special Purpose-Healthcare Facility and Hospital Zone

100. Include a building height limit of 22m inside walkable catchments as shown in an updated version of **Table H25.6.1.1 Building Heights**

Site area	Permitted activity standard	Restricted discretionary activity standard	Discretionary activity standard
Sites with a total site area up to 4ha <u>outside walkable catchments</u>	Up to 16m	Between 16m and up to 25m	Greater than 25m
<u>Sites with a total site area up to 4ha inside walkable catchments</u>	<u>Up to 22m</u>	<u>Between 22m and up to 25m</u>	<u>Greater than 25m</u>
Sites with a total site area greater than 4ha	Up to 26m	Between 26m and up to 35m	Greater than 35m
Site subject to the Height Variation Control	Up to the height specified on the Height Variation Control	Infringements to the Height Variation Control and up to 35m	Infringements to the Height Variation Control and greater than 35m
Auckland Hospital buildings	Up to the height specified in Figure H25.6.1.1	Buildings infringing the height specified in Figure H25.6.2.1 and up to 35m	Buildings infringing the height specified in Figure H25.6.1.1 and greater than 35m

Recommendation of provisions for H29 Special Purpose- School Zone

Include a building height limit of 22m inside walkable catchments as shown in an updated version of Table H29.6.2.1: Building heights. Changes are shown as underlined text.

101. **Table H29.6.2.1: Building heights- PROPOSED**

Building Location	Maximum building height
Buildings less than 20m from a boundary with a site in residential zones (except the Residential-Terrace Housing and Apartment Buildings Zone), open space zones, or the Future Urban Zone	12m
Buildings greater than or equal to 20m from a boundary with a site in a residential zone (other than Residential-Terrace Housing and Apartment Buildings Zone) or open space zones, or the Future Urban zone	16m
<u>Buildings inside all walkable catchments</u>	<u>22m</u>
Buildings in all other locations	16m

102. **Recommendation of provisions for H29 Special Purpose-Tertiary Education Zone**

Include a building height limit of 21m inside walkable catchments as shown in an update version of Table H30.6.1.1: Building heights. Changes are shown as underlined text.

Table H30.6.1.1 Building Height – PROPOSED

Building location	Maximum building height
Less than 20m from a site in the residential zones, the Future Urban Zone or an open space zone	12m
<u>Less than 20m from a site in the residential zones, the Future Urban Zone or an open space zone inside walkable catchments</u>	<u>22m</u>
Greater than or equal to 20m from a boundary with a site in the residential zones, the Future Urban Zone or an open space zone	24m

103. Consultation

104. This section 32 evaluation report will continue to be refined in response to any consultation feedback provided to the council following notification, and in response to any new information received.

17. Overall conclusion

105. Building height limits where they are relevant and appropriate to three Special Purpose Zones within walkable catchments assessed in this Section 32 report have been increased to 22m. these are:

- H25 Special Purpose-Healthcare Facility and Hospital Zone
- H29 Special Purpose- School Zone
- H30 Special Purpose- Tertiary Education Zone

106. This is in response to Policy 3 NPS-UD. Additional height will also ensure new development is commensurate with heights for residential and business development within walkable catchments. It supports intensification and growth with increased capacity to achieve a quality-built environment.

18. List of Attachments

Attachment	Name of Attachment
A1	Definitions
A2	Regional Policy Statement B2.8 Social Facilities

19. Attachment 1 Definitions

1. The interpretation of 'building heights'

The National Planning Standards define a building as:

“a temporary or permanent movable or immovable physical construction that is:

- (a) Partially or fully roofed; and*
- (b) Fixed or located on or in land.*

But excludes any motorised vehicle or other mode of transport that could be moved under its own power.”

The National Planning Standards define height as:

“the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.”

Where Policy 3 refers to building heights, it is the ordinary meaning of this phrase in light of the above definitions. That is, the vertical distance (height) of a physical construction that is located on land (building).

The AUP:OP definition of a building is in Chapter J definitions at page 20. See:

<https://unitaryplan.aucklandcouncil.govt.nz/images/Auckland%20Unitary%20Plan%20Operative/Chapter%20J%20Definitions/Chapter%20J%20-%20Definitions.pdf>

1. The interpretation of 'at least 6 storeys'

Policy 3(b) and (c) refer to enabling building heights of at least 6 storeys. The AUP height standards are not calculated in storey units but rather are measured in metres.

To enable a 6-storey building, a height of 22m is required to be enabled. This is made up of occupiable building height (20m) and height for roof form (2m).

This height standard aligns with the AUP's Height Variation Control standard for a 6-storey building in the Business-Mixed Use zone, Business- Town centre zone, Business-Local Centre zone and Business-Neighbourhood Centre zone. The HVCs used across the business zones are shown in the following table. Note that there are some HVCs with lower heights e.g. 13m that reflect qualifying matters.

Location	Occupiable building height	Height for roof form	Total building height
Buildings outside a walkable catchment	16m	2m	18m
Buildings in a walkable catchment	N/A	N/A	22m (6 storeys)

Buildings in a walkable catchment-Height Variation Control: 10 storeys	N/A	N/A	34.5m (10 storeys)
Buildings in a walkable catchment-Height Variation Controls; 15 storeys	N/A	N/A	50m (15 storeys)

The 22m height is made up of:

4m: 4m ground floor height

16m: 3.2m floor to floor heights (x5)

2m: 2m roof height

22m: Total

The proposed 22m total building height standard for THAB walkable catchments is based on enabling a 'viable' 6 storey apartment building. A total building height of 22m is considered to enable a more viable and better quality 6 storey apartment building than the THAB 6 storey HVC. Jasmax Architects has confirmed through modelling that a 22m height standard will not have an impact on the other proposed standards for THAB in walkable catchments.

Where Policy 3 refers to "at least" 6 storeys this means that a minimum of 6 storeys must be enabled, but storeys is not necessarily the maximum height- it could be higher (but not lower) than 6 storeys.

It is also pertinent to note that the AUP must only *enable* buildings of at least 6 storeys and does not *require* new developments to be at least 6 storeys. The MfE guidance on implementing the intensification provisions of the NPS-UD state:

"For the avoidance of doubt, the six-storey minimum district plans must enable and not a minimum development rule. For example, local authorities are not required to set objectives, policies and rules to prevent the construction of buildings less than six storeys. While plans must enable six or more storeys, a developer or landowner can still choose to construct a lower-height building.

The interpretation of 'density of urban form'

Policy 3 refers to regional policy statements and district plans enabling a 'density of urban form'. The AUP contains various provisions that relate directly to density such as rules around how many dwellings are permitted per site.

However, to genuinely enable additional density it is not just the rules specifically related to density of dwellings that need to be considered. The full package of controls that affect total development space need to be considered such as gross floor area, yard and podium setbacks, and recession planes.

Therefore, the council has examined the potential limitations on density on typical urban sites and proposes to amend the various objectives, policies, and rules throughout the AUP to enable higher densities of urban form.

How density is delivered across Auckland is discussed in the Strategic Section 32 report, Section 32- intensification and Section 32 – Economy Matters (Doug Fairgray).

The interpretation of ‘development’ capacity is defined in the NPS-UD as:

“the capacity of land to be developed for housing or for business use, based on:

- a) The zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
- b) The provision of adequate development infrastructure to support the development of land for housing or business use.

Plan-enabled has the meaning in clause 3.4(1). Development capacity is plan-enabled for housing or for business land if:

- a) In relation to the short term, it is on land that is zoned for housing or for business use (as applicable) in an operative district plan.
- b) B) in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a proposed district plan
- c) In relation to the long term, either paragraph (b) applies, or it is on land identified by the local authority for future urban use or urban intensification in a Future Development Strategy or, if the local authority is not required to have an FDS, any other relevant plan or strategy.

Attachment 2: Regional Policy Statement

B2.8 Social facilities

B2.8.1 Objectives

- (1) Social facilities that meet the needs of people and communities, including enabling them to provide for their social, economic and cultural well-being and their health and safety.
- (2) Social facilities located where they are accessible by an appropriate range of transport modes.
- (3) Reverse sensitivity effects between social facilities and neighbouring land uses are avoided, remedied or mitigated.

B2.8.2 Policies

- (1) Enable social facilities that are accessible to people of all ages and abilities to establish in appropriate locations as follows:
 - (a) Small-scale social facilities are located within or close to their local communities.
 - (b) Medium-scale social facilities are located with easy access to city, metropolitan and town centres and on corridors.
 - (c) Large-scale social facilities are located where the transport network (including public transport and walking and cycling routes) has sufficient existing or proposed capacity.
- (2) Enable the provision of social facilities to meet the diverse demographic and cultural needs of people and communities.
- (3) Enable intensive use and development of existing and new social facility sites.
- (4) In growth and intensification areas identify as part of the structure plan process where social facilities will be required and enable their establishment in appropriate locations.
- (5) Enable the efficient and flexible use of social facilities by providing on the same site for:
 - (a) Activities accessory to the primary function of the site; and
 - (b) In appropriate locations, co-location of complementary residential and commercial activities.