

Property Council New Zealand

Submission to Auckland Council on the proposed amendments to Plan Change 120: Housing Intensification and Resilience

24 September 2026

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Auckland Council

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1. Summary

- 1.1. Property Council New Zealand (“Property Council”) welcomes the opportunity to submit on the proposed amendments to Plan Change 120: Housing Intensification and Resilience (“PC120”) to Auckland Council.
- 1.2. Property Council supports the proposed amendments to PC120, which respond to the reduced minimum housing capacity requirement by focusing intensification within walkable, accessible and transit-oriented locations. This is an approach our members consider to be sensible and pragmatic. However, we are disappointed that Council has not sought intensification across more of these strategic locations, noting that enabling greater density does not require it to occur, with market conditions determining what is ultimately viable.
- 1.3. To minimise uncertainty throughout the transition to the new planning system and maintain momentum in our sector, Property Council encourages amending PC120 to remove consenting considerations from the Auckland Unitary Plan (AUP) that will be out of scope under the transitional consenting regime and the new planning system. To enable flexibility, innovation and proportionate mitigation of natural hazard risks, we encourage amending PC120 to prioritise site-specific hazard assessments and to support design responses.
- 1.4. With targeted adjustments, we believe that PC120 can successfully enable more housing, business and industrial development in the right places, strengthen resilience, and support the ongoing development of vibrant, well-functioning communities across Auckland.

2. Recommendations

- 2.1. At a high level, Property Council recommends the following:
 - A. Apply 10-15 storey height limits consistently to all walkable catchments, including those beyond 10 kilometres from the city centre;
 - B. Apply at least a 6-storey height limit to all Town Centres, not just the listed 34 Town Centres;
 - C. Apply at least a 6-storey height limit to all Local Centres, rather than withdrawing relevant proposals from PC120;

- D. Upzone any identified Frequent Transit Network corridors achieving an overall multi-criteria analysis score of six or greater and classify these as as Corridor Intensification Areas, not just the 21 listed corridors;
- E. Amend PC120 to align with the requirements of the new planning system by removing 'out of scope effects' from the Auckland Unitary Plan, in accordance with clause 14 of the Planning Bill;
- F. Auckland Council continues to provide independent urban design advisory services for significant projects, regardless of changes to the planning system;
- G. Auckland Council introduces distinct typology-specific assessment pathways for apartments and terrace housing within the Terrace Housing and Apartment Buildings zone or clearly differentiates the applicable rules and criteria for each typology;
- H. Removing the deep soil and tree canopy provisions, due to their impact on the developable area of a site;
- I. PC120 expressly allow robust site-specific assessments commissioned by landowners to be used to inform, and, where appropriate, take precedence over Council's mapped hazard classification;
- J. That sites downzoned based on new Annual Exceedance Probability flood hazard data be re-zoned to be consistent with neighbouring sites, with design standards created to manage risks;
- K. Auckland Council follows government direction to use a range of credible climate scenarios when assessing infrastructure planning decisions, including medium and high-end scenarios;
- L. Auckland Council follows government direction to clearly identify which climate change modelling scenario has been adopted as the primary planning assumption and explain why; and
- M. Auckland Council follows government direction to ensure that regulatory decisions about natural hazards, affecting landowners, businesses and communities, are supported by robust evidence and are proportionate to the risks being managed.

3. Introduction to Property Council New Zealand

- 3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is "Together, shaping cities where communities thrive."
- 3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.

- 3.3. Property is Auckland's largest industry. There are around \$997.8 billion in property assets across Auckland, with property providing a direct contribution to GDP of \$13 billion and employment for 87,080 Auckland residents.
- 3.4. We connect property professionals and represent the interests of 449 Auckland companies (and their teams) across the private, public and charitable sectors.
- 3.5. This document provides Property Council's feedback on [Auckland Council's proposed amendments to Plan Change 120: Housing Intensification and Resilience](#), with comments and recommendations on issues relevant to our members. Reflecting the diversity of our membership, Property Council members may wish to comment in greater detail on issues specific to their business. Accordingly, we support individual members providing separate submissions addressing those matters.

4. Support for the general approach to intensification

PC78 and PC120 (as notified in November 2025)

- 4.1. Property Council's submission on the prior version of PC120 as notified in November 2025 (our November PC120 Submission)¹ and our submission on Plan Change 78: Intensification ("PC78") expressed support for Auckland Council's broad objective of urban intensification, particularly around rapid transit stops, along major bus routes and around commercial centres, along with widespread upzoning of residential areas.
- 4.2. We endorsed Auckland Council's overall approach via PC78 and PC120 to enable greater density, reduce urban sprawl, improve transport and infrastructure efficiency, and meet Auckland's urgent housing and growth demands. We are consistent in our advocacy for robust, effective, and consistent rules for property development.
- 4.3. Enabling capacity for 2 million homes via widespread upzoning, consistent with the Medium Density Residential Standards (MDRS), would present a multitude of new opportunities for development and growth. However, our members understand and support the reasons for opting out of PC78 and the MDRS, and the reasons for proposing amendments to PC120 to withdraw aspects of the plan change that would upzone most of Auckland's residential areas.
- 4.4. Property Council acknowledges that the Government is currently consulting on proposals to amend the City Centre Zone provisions of the AUP to enable greater height and density. We note Auckland Council progressed changes to the City Centre Zone provisions via PC78, and further changes are out of scope of PC120.
- 4.5. Considering extreme storms and flood events in recent years, it is essential to ensure Auckland's planning system provides for climate resilience, based on robust data.

¹ <https://www.propertynz.co.nz/submissions/property-council-submission-to-auckland-council-on-plan-change-120-housing-intensification-and-resilience>

Additionally, it is important to enable intensification in the right places, with access to amenities and services, not just providing theoretical capacity in low-demand areas.

Proposed amendments to PC120

- 4.6. In the context of the reduced minimum housing capacity requirement from 2 million to 1.4 million, Property Council generally supports the proposals to concentrate intensification within walkable catchments, around town centres and along transport corridors by applying modified Terrace Housing and Apartment Buildings (THAB) zoning and Height Variation Controls up to 10 or 15 storeys. Allowing taller residential buildings in these strategic locations will eventually lead to greater housing affordability, more efficient use of infrastructure, higher productivity, and support growth in existing and new communities.
- 4.7. We note members are concerned about proposals to downscale the density of development that was proposed in PC120 (as notified in November 2025) within walkable catchments and along transit corridors outside the 10-kilometre radius from the city centre, and around suburban centres. It is disappointing that the proposed amendments effectively reduce housing capacity in key locations. Just because greater density is enabled, it won't necessarily be realised. Market conditions will always determine what is ultimately feasible. Accordingly, development capacity should be viewed as a maximum planning envelope, not a minimum development outcome.
- 4.8. Beyond intensification in strategic locations, members note it is beneficial to maintain medium and lower density residential zones across the region to support the ongoing provision of larger housing typologies that can meet the needs of larger families. A mix of higher and lower density residential zoning also supports the creation and maintenance of character across different neighbourhoods, enhancing Auckland's liveability.
- 4.9. We support the withdrawal of proposals from PC120 to upzone the wider residential area, recognising that lower density residential zoning enables the delivery of diverse housing typologies, including larger homes across the Auckland region.

5. Increased height limits to enable housing capacity

Walkable Catchments

- 5.1. Property Council supports the application of THAB zoning and Height Variation Controls that enable height limits of 10 or 15 storeys within all walkable catchments. Even if building heights of 10-15 storeys are challenging to deliver under current economic conditions and policy settings, it is important that planning settings enable this development capacity. The proposed amendments to PC120 need to provide zoning for the future, allowing the market to have choices about where to deliver higher-density development as it becomes more feasible over the medium to long term.

- 5.2. Our members are concerned about the impacts on the occupants of existing 6 storey buildings in areas being upzoned to 10 or 15 storeys. Residential and business tenants are likely to experience increased rents, reflecting the value uplift of underlying land and increased development potential. Limiting the supply of land zoned for 10 to 15 storey development to certain areas within a 10 kilometre radius of the city centre risks constraining supply and exacerbating rental affordability pressures in those areas. Applying THAB zoning and Height Variation Controls to all walkable catchments will reduce the scarcity of such land, supporting more competitive urban land markets.
- 5.3. **Recommendation A:** We recommend applying 10-15 storey height limits to all walkable catchments, including those beyond 10 kilometres from the city centre. This will enable more efficient use of existing infrastructure and amenities, reduce carbon emissions, and provide more support for local businesses.

Town Centres and Local Centres

- 5.4. Property Council supports the proposed amendment to consistently apply height limits of 6 storeys or higher around Town Centres. However, restricting intensification to 34 Town Centres limits housing supply in areas with good access to amenities, services, and public transport outside Auckland Council's boundaries.
- 5.5. Members are disappointed by the withdrawal of 6-storey height limits around Local Centres. Enabling higher density development around Local Centres would promote the goals of the National Policy Statement on Urban Development to increase housing near small-scale amenities. Allowing development up to 10 or 15 storeys would enable more apartments to benefit from long views and sufficient density to deliver onsite amenity for residents.
- 5.6. When considering whether to enable height limits of 6 storeys or greater, our members expressed that 10-15 storey apartment buildings in suburban areas would enable enough density to deliver onsite amenity and more apartments to benefit from long views towards Auckland's maunga and harbours.
- 5.7. Allowing intensification around suburban centres will enable the delivery of different housing typologies in more communities, allowing older people to continue living in accessible areas and providing opportunities for younger people to enter the property market in desirable locations. Planning should account for varied travel patterns and lifestyle choices across all local precincts. Many residents work locally and do not always require commuting to the city centre.
- 5.8. **Recommendation B:** We recommend applying at least a 6-storey height limit to all Town Centres, not just the 34 that are listed.
- 5.9. **Recommendation C:** We also recommend applying at least a 6-storey height limit to all Local Centres, rather than withdrawing relevant proposals from PC120.

Frequent transit network

- 5.10. We support the application of THAB zoning and Height Variation Controls along FTN corridors, for properties within 200m. Property Council endorses an amenity and transit-focused intensification strategy. We support prioritising rapid transit stations and FTN routes as the main hubs for growth. Adopting a city-wide network approach strengthens alignment with Auckland's goals for a dense, transit-friendly, and adaptable urban environment.
- 5.11. Members have noted some transport corridors that would be suitable for residential upzoning but have not been identified as FTN corridors. For example, upzoning should be applied along the FTN corridor between Waitemata Station and St Heliers Bay along Tāmaki Drive, which is serviced by the TāmakiLink Bus.
- 5.12. **Recommendation D:** To reiterate our November PC120 Submission, we recommend any identified FTN corridors achieving an overall multi-criteria analysis score of six or greater² to be upzoned for inclusion as Corridor Intensification Areas, not just the selected 21 corridors.

6. Aligning with planning system reform

Out of scope effects

- 6.1. Under the transitional consenting regime (section 104 of the Resource Management Act 1991) and the new planning system (clause 14 of the Planning Bill), a range of effects will be considered out of scope for consenting decisions, including internal building layouts and external building layouts that have no effects beyond the site boundary.
- 6.2. Members are becoming hesitant about proceeding with projects in Auckland during the transition period, due to uncertainty about the planning rules that will apply for the next few years.
- 6.3. To address this, PC120 needs to align with the requirements of the new planning system by ensuring the AUP does not include 'out of scope effects'. Provisions to be removed could include some of the THAB Zone provisions discussed below.
- 6.4. In this way, early-stage development projects can attract investment and progress throughout the transition to the new planning system with confidence that local planning rules and consenting decisions will be consistent, clear, and aligned with central government direction into the foreseeable future.

² Auckland Council, *Proposed Plan Change 120 – Housing Intensification and Resilience (PC120) to the Auckland Unitary Plan (Operative in part) Section 32: Evaluation Report (2025)*, <https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/unitary/pc-120/72-pc120-s32-policy-3.pdf>

- 6.5. **Recommendation E:** We recommend amending PC120 to align with the requirements of the new planning system by removing ‘out of scope effects’ from the AUP, , in accordance with clause 14 of the Planning Bill.

Urban design considerations

- 6.6. Members note that removing ‘out of scope effects’ from the AUP may increase the risk of poor urban design outcomes and the delivery of buildings with inappropriate internal layouts, such as bedrooms without windows, or apartments without storage. However, over time, these risks would be managed by market responses to such developments.
- 6.7. Although it is beyond the scope of this consultation on the proposed amendments to PC120, Property Council encourages Auckland Council to continue promoting best practice urban design and providing independent urban design advisory services for significant projects, regardless of the outcomes or directives of PC120, the transitional consenting regime, and the new planning system.
- 6.8. Good design outcomes are essential to support thriving cities. Even if consent is not required, we consider Auckland Council is best placed to ensure that new projects contribute to better outcomes for Auckland’s communities.
- 6.9. **Recommendation F:** We recommend Auckland Council continues to provide independent urban design advisory services for significant projects, regardless of changes to the planning system.

7. Terrace House and Apartment Building Zone provisions

Separate rules for different typologies

- 7.1. In our November PC120 submission, Property Council expressed concern that the current zoning definition for THAB is flawed. Two different development types are consolidated into a single zone. Apartment developments usually include body corporate governance arrangements, whereas terraced housing tends to be 2-3 storey townhouses without distinct governance structures and with simpler property rights across different owners of areas developed through subdivision.
- 7.2. Several assessment criteria in PC120 seem tailored to townhouse outcomes and may not suit apartment typologies. This could lead to apartment designs that mimic townhouse expectations, resulting in inefficient layouts and weaker built outcomes.
- 7.3. **Recommendation G:** We recommend that Auckland Council introduce distinct typology-specific assessment pathways for apartments and terrace housing within the THAB zone or clearly differentiate the applicable rules and criteria for each typology.
- 7.4. It is important to keep in mind that such provisions may need to change again once the Government develops its National Standards. Any ‘out of scope’ effects during the

transitional consenting period and under the new planning system will also impact zoning provisions.

THAB Zone provisions and 'out of scope effects'

- 7.5. Medium to long term certainty about planning and consenting settings is essential to our sector, given the long-lived nature of many projects. To ensure housing and other development activity doesn't stall, PC120 needs to be as consistent with the new planning system as possible, noting that regulations under the new system are still being developed.
- 7.6. By way of example, members have considered the THAB zone provisions in the proposed amendments to PC120 in light of the 'out of scope effects' provisions in section 104 of the RMA and clause 14 of the Planning Bill.

Height in relation to boundary

- 7.7. We support the amended height in relation to boundary ("HIRB") rules. These are closely aligned with the alternative HIRB rules in the current AUP that members have relied on for over 10 years. However, consistent with our recommendation above, PC120 should include different provisions for different typologies i.e., a HIRB provision for apartment buildings and a different one for terrace houses.
- 7.8. We consider height in relation to boundary would not be an 'out of scope effect' under the new planning system.

Upper floor setbacks

- 7.9. Members oppose upper floor setback requirements. Such requirements overlap with HIRB controls. The stepped HIRB plane, starting at approximately 21.5 metres, often limits the building envelope more than the upper-level setback itself. This can significantly limit viable floor area for mid-rise apartments, disadvantaging early projects and reducing usable space within permitted heights. These controls suit very tall buildings better than mid-rise forms.
- 7.10. We consider upper floor setbacks may be an 'out of scope effect' under the new planning system.

Maximum tower dimensions

- 7.11. Property Council opposes prescribed dimensions for buildings. Site-specific variation is essential for high-quality development outcomes and improves on the previous floor-area ratio method. We are concerned about the efficiency and effectiveness of a fixed maximum tower dimension.
- 7.12. We consider maximum tower dimensions may be an 'out of scope effect' under the new planning system.

Landscaped area

- 7.13. The requirement to provide natural grass and planting to cover 30% of the site area can constrain how a site is developed. Some members have used rooftop planting simply to meet the criteria. We recommend removing all provisions on landscaping rules.
- 7.14. We consider landscaped area provisions may be an 'out of scope effect' under the new planning system.

Outlook space

- 7.15. The portion of any THAB zone building above 12.5 metres requires an 8-metre outlook space, and the portion above 22 metres requires a 20-metre outlook space. These provisions could significantly decrease the number of feasible development options and constrain how sites are arranged, potentially leading to fewer new homes being built. Having a stepped approach to outlook space setbacks can create construction and waterproofing issues. A 6-metre outlook space for the entire height of the building would enable longer and wider views from the upper floors of the building.
- 7.16. We consider outlook space may be an 'out of scope effect' under the new planning system.

Windows

- 7.17. We oppose rigid rules on windows facing the street. These could restrict innovative design and make some developments less viable. Although members note examples of terraced houses with blank walls facing the street, using discretion would encourage high-quality design solutions without imposing a one-size-fits-all standard. The proposed 20% glazing requirements should not apply to pedestrian accessways and internal accessways.
- 7.18. We consider provisions relating to windows and glazing may be an 'out of scope effect' under the new planning system.

Deep soil and tree canopy

- 7.19. Although we support increasing tree cover in urban areas, we have major issues with these provisions. Requirements to provide deep soil and tree canopy cover will be unworkable due to the space that needs to be set aside onsite, significantly reducing the building envelope. Tree roots are problematic, particularly if the development includes basement car parking.
- 7.20. We consider provisions relating to deep soil and tree canopy may not be an 'out of scope effect' under the new planning system.
- 7.21. **Recommendation H:** We recommend removing the deep soil and tree canopy provisions, due to impacts on the developable area of a site.

Residential waste management

- 7.22. Members support requirements for onsite waste storage and to set aside space for kerbside collection. Members oppose any requirement for onsite collection of individual waste bins. The amount of space to be set aside for collection trucks to manoeuvre can significantly reduce the developable area of the site, affecting project design, costs and overall feasibility.

8. Natural Hazards

- 8.1. Property Council recognises the PC120 rules relating to natural hazards (including flooding risk) took immediate effect on 3 November 2025, in accordance with section 86B of the RMA. Auckland Council's determined risk levels are divided into significant, potentially tolerable (medium), and acceptable (low) and are applied based on hazard rating.
- 8.2. In principle, Property Council supports the risk-based approach. When PC120 was notified in November 2025, members had reservations about the natural hazard risk provisions due to a lack of clarity and transparency. At the time, information available in the map viewer wasn't sufficient to enable self-assessment of the flood risk for a site and the related restrictions on activities.
- 8.3. The consultation materials and updated maps supporting the proposed amendments to PC120 are now much clearer, but assessing comprehensive hazard risk for properties based on multiple factors remains challenging. Natural hazard susceptibility areas must be easily identifiable by non-technical users. The current use of multiple hazard categories, sub-categories, and physical characteristics creates uncertainty about where rules apply and when site-specific assessment is needed.

Accuracy of natural hazard data

- 8.4. We are concerned that the publicly available natural hazard data is too high level and potentially out of date and therefore cannot be relied on for classifying site-level risk and applying the relevant activity status.
- 8.5. Transparency about the underlying data for the hazard categories (i.e., from low to very high) will give the sector more confidence to assess the risk level, identify the relevant activity status, communicate with council, and make decisions about design and feasibility.
- 8.6. Members consider that Council's mapped data could provide a useful starting point for assessing natural hazard risk, but should not prevent more accurate, site-specific information from being considered. Site-specific geotechnical and other technical

assessments can provide more current and granular information about the actual characteristics and risks of an individual site.

- 8.7. We oppose using regional-scale hazard mapping as an automatic trigger for risk classification or activity status. Risk should not be assigned without first assessing whether hazards have been, or can be, effectively mitigated through development design, engineering, landform modification, or adaptive measures. Across Auckland, comprehensive redevelopment of both brownfield and greenfield sites has often successfully avoided or reduced flood hazards. These interventions have frequently led to improved outcomes. Assigning risk classifications before evaluating mitigation options is unnecessarily rigid and inconsistent with adaptive, effects-based planning.
- 8.8. **Recommendation I:** We recommend that PC120 expressly allow robust site-specific assessments commissioned by landowners to be used to inform risk levels, and where appropriate take precedence over Council's mapped hazard classification. This would ensure planning controls and activity status are proportionate to the actual risk, rather than being determined solely by high-level or potentially outdated mapping.

Rezoning to manage flood risk

- 8.9. Downzoning to manage site-specific flood risk is not always an appropriate mitigation response. Lower density housing doesn't necessarily reduce the risk to people or property. Our sector requires the flexibility to respond to risks through thoughtful design.
- 8.10. Our members consider that downzoning reduces housing capacity even where development is still safe and financially feasible. PC120 may hinder efficient outcomes by classifying low-lying land as high risk without considering how development can avoid or reduce hazard exposure. Applying downzoning to most flood-prone and hazard-identified sites is problematic.
- 8.11. In our November PC120 submission, we noted stakeholders across the property market have already internalised natural hazard risk through powerful market-based constraints and mechanisms since Cyclone Gabrielle and other extreme weather events. For example, engineered solutions such as floodplain modification, raised land, and controlled conveyance were effective during the 2023 Auckland Anniversary Floods. These mechanisms include:
- Insurance risk adjustments – companies now price flood, landslide, and coastal hazards with high levels of detail.
 - Business banking assessments – banks conduct their own hazard assessments and will not finance uninsurable projects.

- Engineering assessment – developers typically commission consultants that specialise in geotechnical analysis, flood modelling and civil engineering to provide technical advice and assurance.

8.12. Given all of these existing market safeguards, downzoning produces perverse outcomes for all stakeholders. Downzoning applies a precautionary response twice. First, through conservative hazard modelling and then through zoning reduction without adequately considering site-specific mitigation or adaptive adjustments. Developers, commercial banks, insurance companies, and homebuyers are all highly sensitive to natural hazard risk. Downzoning should be used only as a last resort if Auckland Council is not confident in its region-wide natural hazard provisions.

8.13. **Recommendation J:** We recommend that sites downzoned based on new flood hazard Annual Exceedance Probability data be re-zoned to be consistent with neighbouring sites, with design standards created to manage risks. This will support redevelopment of hazard-exposed land, where risk can be reduced to tolerable or acceptable levels through engineering or adaptive measures.

PC120 reliance on high-end emissions scenarios

8.14. We are concerned about the down-zoning response to flooding risk and other natural hazard risks in the Intergovernmental Panel on Climate Change (IPCC) worst-case climate change scenario, RCP 8.5.³ Property Council notes that advisors to the IPCC have since described RCP 8.5 as an unlikely scenario. Because Auckland Council uses RCP 8.5 in its hazard risk modelling, mapping and zoning proposals/decisions, we consider PC120 is too restrictive on development. We also note the Government has advised all local authorities to use a range of climate change modelling scenarios for accuracy.

8.15. **Recommendations K-M:** We recommend that Auckland Council follows Government direction to:

- use a range of credible climate scenarios when assessing infrastructure planning decisions, including medium and high-end scenarios;
- clearly identify which scenario has been adopted as the primary planning assumption and explain why; and
- ensure that regulatory decisions about natural hazards, affecting landowners, businesses and communities, are supported by robust evidence and are proportionate to the risks being managed.

³ IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change
https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf

9. Conclusion

- 9.1. Property Council thanks Auckland Council for the opportunity to submit on the proposed amendments to PC120.
- 9.2. We support the intent of the proposed amendments to PC120 to enable housing intensification and climate resilience across Auckland in a focused manner. We support the withdrawal of medium density zoning from many areas across suburban and urban areas in the city. We would like to see density enabled within more walkable catchments, around Local Centres and along more Frequent Transit Network corridors.
- 9.3. Property Council is concerned that zoning provisions under PC120 will be inconsistent with new requirements under the new planning system and its transitional consenting regime. We are also concerned that natural hazard risk management approaches in PC120 may be too conservative and disproportionate to actual risk, which may therefore impose unnecessary constraints on development in key locations.
- 9.4. We remain committed to working with Auckland Council to refine PC120, ensuring it can support the development of vibrant, well-functioning communities across Auckland.
- 9.5. Property Council members invest, own and develop property across New Zealand. We appreciate this opportunity to submit our views in writing and **wish to appear before the Independent Hearings Panel to speak.**
- 9.6. For further enquiries, please do not hesitate to contact Samantha Lay Yee, Senior Advocacy Advisor, via email: samantha@propertynz.co.nz.

Yours Sincerely,



Martin Cooper
Chair, Auckland Regional Committee
Property Council New Zealand