

Hon Chris Bishop
Minister Responsible for RMA reform
Parliament Buildings, Wellington

Via online: <https://consult.environment.govt.nz/resource-management/auckland-city-centre-planning-provisions/consultation/>

16 October 2026

Re. Consultation on Auckland city centre planning provisions

Dear Minister Bishop,

Property Council New Zealand (“Property Council”) welcomes the opportunity to provide a property sector perspective on the Ministry for Cities, Environment, Regions and Transport’s (“MCERT”) investigation into the Auckland Unitary Plan provisions applying within the City Centre Zone.

1. Introduction

Property Council is the leading not-for-profit advocate for New Zealand’s most significant industry, property. 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.

This letter provides Property Council’s feedback on the [Consultation on Auckland city centre planning provisions](https://consult.environment.govt.nz/resource-management/auckland-city-centre-planning-provisions/consultation/), 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.

Our members strongly support the underlying objective of the ‘Auckland Unitary Plan – Options for increasing development capacity, economic growth and employment in the city centre: Report of Investigations’ (the Report). Auckland’s city centre should be able to accommodate substantially more housing, employment, investment and economic activity, particularly given the significant public investment in City Rail Link and other central-city infrastructure.

Property Council’s position is informed by our previous submission to Auckland Council on Plan Change 78 (PC78),¹ which supported removal of the general height and gross floor area

¹ <https://www.propertynz.co.nz/submissions/property-council-submission-to-auckland-council-on-plan-change-78>

controls in the City Centre Zone and argued for planning rules that enable greater development, flexibility and investment. That position remains broadly applicable today.

We support the direction of the recommendations in the Report. However, we consider there are several important matters relating to the quality, transparency and interpretation of the data and modelling that should be addressed before final decisions are made.

2. Recommendations

At a high level, Property Council recommends the following:

- That MCERT provide greater clarity on information relied on for the development capacity assessment and economic assessment;
- That MCERT publish a clear reconciliation between the theoretical dwelling capacity, the commercially feasible floor space and the estimated number of additional dwellings;
- That the Government clearly set out the process for the proposed changes and their interactions with existing planning processes;
- That the Government provide a clear transition pathway and ensure that the proposed City Centre Zone changes are designed to remain durable under the future planning system; and
- That the Government provide financial support to Auckland Council to implement the proposed City Centre Zone changes.

3. Property Council supports enabling greater capacity in the city centre

The case for greater development capacity in the city centre has strengthened considerably with the opening of City Rail Link (CRL). The city centre is one of a number of key locations where Auckland should be seeking to accommodate additional housing and employment. It is a location with major public transport infrastructure, established services, existing employment concentrations and significant sunk public investment.

Property Council has consistently supported intensification in areas where accessibility, amenities and demand are strongest. Therefore, the objective of any changes should be to ensure that planning rules do not prevent Auckland from making the best possible use of this infrastructure investment, even if anticipated development cannot be delivered immediately.

The Report recognises that commercial feasibility changes over time. This is particularly important in the city centre, where development economics can change significantly as construction costs, interest rates, rents, office demand, apartment values, tourism demand and investment conditions change.

The planning framework should therefore preserve optionality. A site that is not commercially feasible today may become viable in the coming years. Conversely, a development that is feasible under today's conditions may not be feasible under a different market cycle. This provides a strong policy rationale for removing unnecessary planning constraints even where the immediate development response is expected to be limited.

The purpose of enabling greater capacity is not to predict exactly what will be built. It is to ensure that planning rules do not prevent development when the market is ready to deliver.

4. Removal of general height limits

Property Council supports the proposed removal of the general building-height limit across most of the City Centre Zone. Auckland is New Zealand's largest and most internationally connected city. Its city centre should have the planning framework necessary to develop a skyline and urban form commensurate with its role as a global city. Compared with other international cities, Auckland has relatively few very tall buildings, and there is value in allowing the market to determine where greater height is appropriate.

At the same time, our members do not consider that unlimited height will necessarily translate into substantially taller buildings across the city centre. Development is ultimately dependent on market conditions, including land values, construction costs, financing costs, rents, sale values, demand and the availability of suitable development sites. A planning rule may permit a building to be considerably taller or wider without making such a building commercially viable.

Accordingly, we see considerable merit in removing the height limit even if, in practice, many developments continue to be around the existing height range. Removing an arbitrary maximum gives the market and individual development proposals greater flexibility over time. The appropriate height for a site should be determined by the development opportunity, market conditions, design considerations and other applicable planning controls rather than by a blanket city-wide ceiling.

5. Removal of tower and frontage controls

We also support the proposed removal of maximum tower dimensions, tower separation and boundary setback requirements, the east-west tower dimension control, and prescriptive frontage-height and upper-level setback requirements.

This is consistent with Property Council's position on PC78, where we raised concerns that overly prescriptive built-form rules could constrain high-quality development and create unintended design outcomes. Planning rules should establish appropriate outcomes without unnecessarily prescribing the means by which those outcomes must be achieved.

6. Precinct controls should be reviewed consistently

We support the proposed removal of site-intensity or floor-area ratio controls in the Britomart, the Central Wharves, Viaduct Harbour and Wynyard precincts (option 2). These changes should be considered alongside the wider removal of gross floor area and height controls via PC78.

If the policy objective is to enable Auckland's city centre to respond flexibly to future housing and employment demand, retaining isolated intensity controls (option 1) risks recreating some of the constraints that the wider package is intended to address. A consistent approach across the City Centre Zone is preferable unless there is a clearly evidenced, site-specific reason for retaining a control.

7. Karangahape Road heritage provisions

With the establishment of the Karanga-a-hape CRL station, the surrounding area is another key location that Property Council considers suitable for further intensification. Property Council supports the proposed removal of non-contributing sites from the mapped Karangahape Road Historic Heritage Area, provided the identification of non-contributing sites is robust and transparent. This approach is consistent with our established position that heritage protection should focus on places that make a meaningful contribution to recognised heritage values, rather than imposing the same restrictions on sites that do not contribute materially to those values.

The protection of scheduled heritage places and genuinely contributing sites should remain. The economic benefits identified for these sites should, however, be presented as potential benefits rather than certain outcomes. As with the wider city centre modelling, actual redevelopment will depend on ownership, market conditions, construction economics and the viability of individual development proposals.

8. Requiring resource consent

Removing height and built-form controls could result in development proceeding without sufficient consideration of design and amenity. The proposed changes appropriately retain a resource consent process. This provides an important balance; developers would have greater flexibility to determine the most appropriate built form for a particular site, while proposals would continue to be assessed through the consenting process against relevant design, environmental, public realm and other requirements. In our view, this is preferable to attempting to prescribe an optimal building envelope in the planning rules themselves.

The property sector supports a planning framework that enables height and density while retaining an effective design assessment process. The objective should not be to eliminate design scrutiny, but rather to move away from unnecessarily prescriptive rules that

predetermine the form of a building before the site, development proposal and design response have been considered.

9. Further transparency around the modelling is required

Property Council welcomes the publication of the site-level capacity modelling and associated spatial data. Making the underlying information available is important and is consistent with the need for transparent, evidence-based planning. However, we consider that the modelling would benefit from further explanation and sensitivity testing before it is relied upon as a basis for major policy conclusions.

The rationale for assumptions relied on for the development capacity assessment and economic assessment is not clearly laid out in the Report. For example, the Report notes that the development capacity assessment uses the same approach as the PC120 capacity calculation, which assumes a 50:50 residential-to-commercial floor-space split and 120 square metres of gross floor area per dwelling. It also notes that the economic modelling uses a 51:49 split and 70.2 square metres per dwelling, but it doesn't explain why the assumptions differ, how the different assumptions affect the resulting dwelling numbers, and which figures should be used for which policy purposes.

We recommend that MCERT provides greater clarity on information relied on for the development capacity assessment and economic assessment, including:

- the baseline planning provisions against which capacity increases have been calculated;
- the extent to which individual controls are binding constraints on individual sites;
- infrastructure capacity to support intensification of existing sites;
- how site amalgamation and fragmented ownership have been treated;
- assumptions regarding demolition, redevelopment and existing building utilisation;
- construction costs by building type and building height;
- feasibility considerations such as finance and holding costs, land values, residual land values, expected rents and sale values, development margins, and required returns;
- the treatment of commercial, residential, hotel, visitor accommodation and other uses;
- the assumptions underpinning residential versus commercial floor-space allocation;
- the treatment of seismic, servicing, access, fire and other non-planning constraints;
- the treatment of sites that are technically capable of development but unlikely to be brought forward because of market or ownership considerations; and
- the sensitivity of results to changes in market conditions.

We recommend that MCERT publish a clear reconciliation between the theoretical dwelling capacity, the commercially feasible floor space and the estimated number of additional dwellings. This would make the evidence base substantially easier for stakeholders and decision-makers to review.

10. Changing the City Centre Zone provisions in the Auckland Unitary Plan

Property Council recognises that the Government is using the statutory investigation and regulation-making framework established under section 360I of the Resource Management Act 1991. However, members have expressed concern and uncertainty about the mechanism through which Government proposes to make changes to Auckland's City Centre Zone, particularly given the broader transition occurring within New Zealand's planning system.

Our sector is currently navigating significant uncertainty associated with planning system reform, while Auckland Council is also progressing amendments to PC120. Our sector needs confidence that existing consenting processes and new investment decisions based on the new rules will not be undermined by another imminent regulatory change.

Property Council is also concerned about the impact on Auckland Council and its ratepayers, particularly given the plan change process already underway and upcoming work to comply with the requirements of the new planning system.

We recommend that the Government clearly set out the process for the proposed changes and their interactions with existing planning processes, including details of:

- the intended legal mechanism and status of any regulations;
- the relationship between those regulations and the Auckland Unitary Plan;
- how the changes will interact with PC120;
- how the changes will interact with the new planning system, particularly during the transition period;
- how existing consent applications and plan changes will be treated during the transition; and
- whether the proposed rules are intended to remain operative under the future planning framework or be transitioned into that framework.

We recommend that the Government provide a clear transition pathway and ensure that the proposed City Centre Zone changes are designed to remain durable under the future planning system.

We recommend that the Government provide financial support to Auckland Council to implement the proposed City Centre Zone changes.

11. Summary

Property Council supports the overall direction of the Report and recommends that Government proceed with the proposed regulations to remove:

- the general City Centre Zone height limit;
- maximum tower dimensions;
- tower separation and boundary setback controls;
- the east-west tower dimension control;
- prescriptive frontage-height and upper-level setback requirements; and
- the specified site-intensity controls.

We also support the proposed treatment of non-contributing sites within the Karangahape Road Historic Heritage Area, subject to transparent and robust identification of those sites.

Our support is based on a fundamental principle that has underpinned Property Council's previous submissions on Auckland's intensification framework: planning rules should enable development capacity and design flexibility, while allowing the market to determine when, where and at what scale development is commercially viable.

The Report provides a strong basis for removing unnecessary constraints. However, we recommend that the Government strengthen the final evidence base by providing greater transparency around the modelling methodology and data, reconciling the different capacity estimates and assumptions, publishing additional sensitivity analysis, and clearly explaining how the proposed changes will interact with PC120 and the new planning system.

Finally, we encourage the Government to engage closely with Auckland Council and the property sector through implementation. The success of these reforms should ultimately be measured not by the theoretical number of square metres or dwellings that planning rules permit, but by whether Auckland is able to attract the investment necessary to deliver more homes, more employment, greater economic productivity and a vibrant, internationally competitive city centre.

Property Council, particularly our Auckland Regional Committee, would welcome the opportunity to work with MCERT and Auckland Council on the implementation of these changes, and on the development of a durable planning framework for Auckland's city centre.

12. Conclusion

We thank you for the opportunity to submit our views on the Consultation on Auckland city centre planning provisions.

For any further enquiries, please do not hesitate to contact Samantha Lay Yee, Senior Advocacy Advisor via email: samantha@propertynz.co.nz or DDI: 09 300 9580

Yours sincerely,



Martin Cooper
Auckland Regional Committee Chair
Property Council New Zealand