Submission on the Proposed Auckland City Centre Planning Provisions (Section 360I Investigation)

16 October 2026

Dear Minister Responsible for RMA Reform,

Heart of the City (HOTC) represents businesses and property owners across Auckland's city centre. Property owners directly fund our work through the city centre Business Improvement District (BID) targeted rate. They have a substantial and enduring stake in the performance of the city centre, including the value and productive use of property, the ability to attract investment and tenants, and the quality, amenity and attractiveness of the surrounding urban environment.

This gives HOTC a particularly important perspective on the proposed changes to the Auckland Unitary Plan. Our property-owning members are directly affected by the planning and consenting framework that determines what can be developed, how readily investment can proceed, and the level of certainty associated with that investment. At the same time, the value and feasibility of city-centre property ultimately depends on market demand and on Auckland city centre remaining a desirable place for people and businesses to locate, invest, work, live and spend time.

OUR POSITION

HOTC supports the direction of reform to enable more housing, employment and investment in Auckland city centre. However, additional planning capacity will not itself create development where market demand is weak or project economics do not stack up. The more immediate barriers are demand, commercial feasibility and an unpredictable and inconsistent consenting process.

We support greater height where appropriate but seek modifications and safeguards before broad removal of street-frontage, waterfront precinct and heritage-interface controls. The objective should be a city centre with the amenity and basic conditions that generate market demand, coupled with simple and predictable consenting that enables development to respond to that demand.

1. Executive summary

HOTC welcomes the opportunity to comment on the Government's section 360I investigation into specified Auckland Unitary Plan provisions applying in the city centre. We strongly support the objective of unlocking investment, housing, employment and productive use of the substantial public investment in the city centre, including the City Rail Link.

The Government's recommended package would enable unlimited height under the general height standard across most of the City Centre Zone where no other height restriction applies; remove maximum tower dimension, boundary setback, tower-separation and east-west tower dimension standards; remove minimum and maximum street-frontage height and upper-level setback requirements; remove floor-area or site-intensity limits in Britomart, Central Wharves, Viaduct Harbour and Wynyard; and remove non-contributing sites from the Karangahape Road Historic Heritage Area.

Our member feedback points to a clear middle course. Members want growth and investment enabled, but they also place high importance on building quality, heritage, sunlight and amenity, views and the harbour relationship. The preferred overall position is to support the changes while seeking modifications or safeguards.

Crucially, planning capacity should not be confused with development demand: enabling a larger building does not make a project viable if buyers, tenants or investors are not there at the required price. The policy focus therefore needs to extend beyond capacity to the conditions that create demand and convert viable proposals into delivered projects.

2. Basis for Submission

This submission is informed by city-centre property interests and qualitative feedback from interviews.

The strongest stated priorities from the feedback included:

- Enabling more housing and maintaining high-quality building design attracting investment, protecting heritage, and protecting views and the city's relationship with the harbour.
- Improving development feasibility, enabling commercial development and employment, and protecting sunlight and amenity.
- Heritage protection, protecting low-rise waterfront areas ,business continuity during construction, public transport, vehicle accessibility and parking.

3. The principle that should guide reform

We support targeted reform where existing provisions unnecessarily constrain good development. However, the principal constraint on the scale and timing of development is ultimately market demand and commercial feasibility.

Current residential projects can be cancelled, deferred or resized when presales, buyer demand, rents, finance conditions or achievable values do not support the development economics. Increasing permitted capacity does not solve that problem on its own: a larger planning envelope has little practical value if the additional floor area cannot be feasibly funded, sold or occupied.

The consultation material itself illustrates the distinction between capacity and delivery. It estimates 20.3 million m² of additional theoretical floor space from the recommended package, but 2.75 million m² of commercially feasible floor space under the modelled conditions. If delivered and occupied, the package is modelled to support about 17,100 additional dwellings, 31,600 residents and 37,200 city-centre jobs. These are potential benefits, not forecasts. The central policy question should therefore be how to create the conditions in which demand supports investment and commercially viable projects can proceed with confidence.

For Heart of the City, amenity is part of that economic equation. A safe, attractive, accessible and well-managed city centre, with high-quality streets and public spaces, good transport connections, sunlight and wind outcomes, and a strong mix of services and activity, helps generate the demand

from residents, businesses, customers and investors that makes development viable. Getting these basic conditions right is therefore not separate from the growth agenda; it is a prerequisite for it.

4. Heart of the City response to the proposed changes

4.1 Building heights: support greater height, with existing protections retained

We support a more enabling approach to height across the city centre, particularly in the commercial core and around rapid-transit investment, provided existing applicable protections such as volcanic viewshafts, sunlight controls, harbour-edge and site-specific height controls continue to operate as stated in the consultation fact sheet. Greater height can improve the economics of redevelopment and create more opportunities for homes and employment. Our members show broad support for increasing city-centre development capacity, but not at the expense of the qualities that make the centre attractive and valuable.

4.2 Street frontages: protect the pedestrian experience and active city streets

Street-level amenity is a shared economic asset. Removing minimum and maximum frontage-height and upper-level setback requirements may improve design flexibility, but it should not weaken expectations for a human-scaled, active and comfortable public realm. Retail, hospitality, offices and residential property all depend on streets people want to use.

We recommend retaining clear performance requirements for active frontages, weather protection where appropriate, façade quality, entrances, servicing, wind and sunlight effects, rather than relying on broadly framed discretion.

4.3 Britomart, Central Wharves, Viaduct Harbour and Wynyard: take a precinct-specific approach

We do not support a blanket removal of floor-area or site-intensity limits across these four precincts without precinct-specific assessment. These locations have distinctive public-realm, heritage, harbour-edge, infrastructure and place-character considerations. Member comments specifically support protecting lower-rise qualities in Britomart and Wynyard and maintaining the city's relationship with the harbour.

We ask government to retain tailored controls in these precincts until the effects of greater intensity have been assessed on a precinct-by-precinct basis, including infrastructure capacity, public realm, heritage, harbour-edge outcomes, wind, sunlight and development feasibility.

4.4 Consenting: capacity reform must be matched by process reform

For many owners and developers, the consenting process remains a more immediate impediment to investment than the maximum development envelope. It can be difficult to predict the information that will be required, how assessment criteria will be interpreted, how long a decision will take, and whether similar proposals will be treated consistently. That uncertainty carries a direct commercial cost: it increases holding and professional costs, complicates financing and can cause otherwise viable projects to be deferred, redesigned or abandoned.

The proposed changes do not, by themselves, resolve this problem. Removing numeric standards without replacing them with clear objective performance tests risks transferring more decisions into discretionary assessment and making outcomes less predictable. A more enabling plan will only translate into development if the consenting pathway is also simple, consistent, timely and capable of giving investors confidence about the rules of the game.

We therefore recommend that consenting reform be treated as a core part of implementation, with clear assessment criteria and acceptable solutions, early and binding issue identification, disciplined information requirements, transparent service standards, and consistent decision-making. The goal

should be proportionate assessment of effects, not repeated negotiation of matters that could be resolved through clear standards.

5. Delivery, certainty and implementation

Increasing capacity in the plan is only one part of enabling development. The development equation is sequential: good city-centre amenity and basic conditions help create market demand; viable demand allows project economics to stack up; and simple, predictable consenting allows projects that meet that market to proceed. If any one of those conditions is missing, additional theoretical capacity may not translate into construction.

We therefore ask government to make demand, commercial feasibility and consenting certainty central to implementation:

- Prioritise the city-centre conditions that support demand: safety and security, high-quality streets and public spaces, accessibility, transport choice, cleanliness, amenity and a strong mix of residential, commercial, hospitality and cultural activity.
- Assess planning reform against commercially feasible and delivered development, not only the amount of theoretical floor area enabled.
- Develop a concise CBD design code with objective tests and published acceptable solutions, so proponents and neighbours can understand the expected outcome before lodging consent applications.
- Establish early pre-application design input for major schemes, with clear issue identification and binding or reliably enforceable Council response timeframes, so material requirements are not introduced late in the process.
- Coordinate infrastructure sequencing and capacity with the additional development enabled by the reforms.
- Address practical barriers to adaptive reuse and conversion of under-used commercial space and seismic strengthening where these prevent productive occupation or redevelopment.
- Address the growing impact of Development Contributions on project feasibility in the city centre. Up-front infrastructure levies can materially affect the viability of residential, mixed-use and adaptive reuse developments, delaying or preventing investment that would otherwise support housing supply, urban regeneration and productive use of existing infrastructure.
- Ensure construction and servicing arrangements recognise the need for existing businesses to remain accessible and viable during periods of major development.

6. Monitoring and accountability

Because the stated purpose of the reform is economic growth, development capacity and employment, implementation should be measured against real-world delivery rather than theoretical capacity alone. We recommend a transparent monitoring programme, reported at regular intervals, covering:

- resource-consent timeframes, refusals and appeals;
- new residential and commercial floor space consented and completed;
- conversion and adaptive reuse outcomes, including the amount of underutilised office, retail and other commercial floor space successfully converted to residential, mixed-use or other productive uses;
- dwellings and jobs delivered, rather than only plan-enabled capacity;
- vacancy and ground-floor activation outcomes;
- wind, sunlight, public-realm and heritage outcomes; and
- infrastructure constraints that delay or prevent otherwise feasible projects.

7. Summary of requested decisions

Proposal	HOTC position	Requested decision / safeguard
Building height	Support with safeguards	Enable greater/unlimited general height in the core and appropriate city-centre locations, while retaining applicable viewshaft, sunlight, harbour-edge and site-specific protections.
Street frontages	Modify	Allow design flexibility.
Britomart, Central Wharves, Viaduct, Wynyard	Further assessment	Retain tailored controls.
Implementation	Strengthen	Make demand, commercial feasibility and consent-process reform core to implementation. Improve city-centre amenity and basic conditions, and provide simple, consistent, timely consenting with clear assessment criteria.
Monitoring	Add	Track actual consenting, delivery, employment, vacancy, activation, environment and infrastructure outcomes.

8. Conclusion

Auckland city centre should be able to accommodate substantially more people, jobs and investment. Heart of the City supports reform that helps make that happen. At the same time, development capacity and city quality are not competing objectives: enduring investment confidence depends on both.

We therefore ask government to proceed with a more enabling planning framework, but to recognise that capacity is an enabler, not a demand generator. The greatest gains will come from aligning three things: city-centre amenity and basic conditions that create market demand; project economics that support investment; and a simple, consistent and predictable consent process that enables viable development to proceed.

The package should be modified so that rule removal is accompanied by clear and efficiently administered safeguards for urban design, street-level amenity, heritage context, the waterfront, safety and infrastructure. This would better support growth that is commercially deliverable and adds lasting value to Auckland city centre.

ENDS

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