



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

to the Auckland Unitary Plan (Operative in part)

Section 32 and Schedule 3C of the Resource Management Act 1991 for qualifying matter:

Outstanding Natural Features and Landscapes (ONFL)

EVALUATION REPORT

Table of Contents

1	Introduction	4
2	Integrated evaluation for existing qualifying matters	5
3	Issues.....	7
4	Objectives and Policies (existing).....	14
5	Development of Options.....	22
5.1	Consequences for development capacity.....	23
5.2	Evaluation of options	25
5.2.1	Analysis	27
5.2.2	Risks or acting or not acting.....	27
5.2.3	Effectiveness and efficiency.....	28
5.3	Description of how the qualifying matter is to be implemented	28
5.4	Overall conclusion.....	28
5.6	Information Used	29
5.7	Consultation summary.....	29

Executive Summary

1. This report discusses the implication of applying D10 Outstanding Natural Features and Landscape Overlays in the Auckland Unitary Plan (Operative in Part) (AUP) as an existing qualifying matter to modify the requirements of Schedule 3C Clauses 4(1)(b) and (c) of the Resource Management Act 1991 (**RMA**) and Policy 3 of the National Policy Statement on Urban Development 2020 – updated May 2022 (**NPS-UD**) in any zone in an urban environment to be less enabling of development.
2. The Outstanding Natural Features and Landscapes (**ONFL**) qualifying matter is a matter specified in section 77I(a) of the RMA, in accordance with Schedule 3C cls.8(1)(a), and is operative in the AUP when the Auckland housing instrument is notified that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD inappropriate in an area. It relates to residential and non-residential urban zones (as well as zones outside urban areas).
3. The areas where the ONLF existing qualifying matter is proposed to apply are within the areas that give effect to the requirements of Schedule 3C Clauses 4(1)(b) and (c) of the RMA and Policy 3 of the NPS-UD (i.e., it does not apply to marine SEA, or terrestrial SEA in areas that are not the subject of PC120).
4. The AUP maps identify the ONLF and the ONLF overlays are shown within the Natural Heritage Overlay heading.
5. The key issue that arises in respect of the ONFL qualifying matter is whether, and to what extent, the level of development specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD is appropriate within ONFL.
6. The ONF overlay applies to a relatively small area of urban land within the region and affects only 0.3% of land in the Residential – Single House (**SH**), Mixed Housing Suburban (**MHS**), Mixed Housing Urban (**MHU**) and Terrace Housing and Apartment Buildings (**THAB**) zones combined (both within and beyond the clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD locations throughout Auckland).
7. The ONFL overlay applies to an extremely small area of urban land within the region, and affects 1.236% of land in the SH, MHS and MHU zones combined (both within and beyond the clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD locations throughout Auckland). There are no ONL values on land that is in the THAB zone.
8. Therefore, it is considered appropriate for the existing provisions of the ONFL overlay to continue to manage development within the Schedule 3C cls.4(1)(b) and (c) of the RMA and policy 3 of the NPS-UD locations to protect ONFL values from inappropriate subdivision, use or development.
9. The impact on housing supply and/or capacity of applying the ONFL existing qualifying matter is expected to be extremely minimal.

1 Introduction

1. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the RMA for PC120 to the AUP.
2. The background to and objectives of PC120 are discussed in the overview report, as is the purpose and required content of section 32 and Schedule 3C evaluations.
3. This report discusses the implications of applying ONFL as a qualifying matter to the requirements of clauses 4(1)(b) and (c) of Schedule 3C of the RMA and the implementation of policy 3 of the NPS-UD. This report also evaluates the provisions which have been included in PC120 relating to the management of ONFL.
4. The Council may make the relevant building height or density requirements of clause 4(1)(b) and (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD less enabling of development in relation to an area within an urban environment only to the extent necessary to accommodate 1 or more of the following qualifying matters present:
 - (a) a matter listed in section 771(a) to (i) of the RMA;
 - (b) any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD, inappropriate in an area but only if subclause (4) of clause 8 of Schedule 3C is satisfied.
5. Under clause 8(2) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(a) or (1)(b) of clause 8:
 - (a) demonstrate why the Council considers:
 - (ii) that the area is subject to a qualifying matter; and
 - (iii) that the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) or policy 3 for that area; and
 - (b) assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
 - (c) assess the costs and broader impacts of imposing those limits.
6. Under clause 8(4) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must, in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(b) (an "other" qualifying matter), also:
 - (a) identify the specific characteristic that makes the level of development specified by clause 4(1)(b) or (c) or policy 3 inappropriate in the area; and
 - (b) justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and
 - (c) include a site-specific analysis that—
 - (i) identifies the site to which the matter relates; and

- (ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and
 - (iii) evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) or policy 3 while managing the specific characteristics.
7. Under clause 8(5) of Schedule 3C of the RMA, the Council may, when considering existing qualifying matters (a qualifying matter referred to in clause 8(1)(a) of Schedule 3C of the RMA that is operative in the AUP when the Auckland housing planning instrument (PC120) is notified), instead of undertaking the evaluation process described in clause 8(2), do all of the following things:
- (a) identify by location (for example, by mapping) where an existing qualifying matter applies:
 - (b) specify the alternative heights or densities (as relevant) proposed for those areas identified under paragraph (a):
 - (c) identify in the evaluation report why the Council considers that one or more existing qualifying matters apply to those areas identified under paragraph (a):
 - (d) describe in general terms for a typical site in those areas identified under paragraph (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been provided by clause 4(1)(b) or (c) or policy 3:
 - (e) notify the existing qualifying matters in the Auckland housing planning instrument.

2 Integrated evaluation for existing qualifying matters

8. For the purposes of PC120, evaluation of the ONFL as an existing qualifying matter has been undertaken in an integrated way that combines section 32 and Schedule 3C of the RMA requirements. The report follows the evaluation approach described in the table below.
9. The preparation of this report has involved the following:
- assessment of the AUP to identify any relevant provisions that apply to this qualifying matter
 - development of draft amendments to the operative district plan provisions of the AUP to implement this matter as a Qualifying Matter in accordance with the requirements of Schedule 3C of the RMA
 - review of the AUP to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter
 - review of the AUP Maps to assess the spatial application of this qualifying matter
 - section 32 options analysis for this qualifying matter and related amendments
10. The scale and significance of the issues is assessed to be minor.

11. This section 32/Schedule 3C evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

Table 1 - Integrated approach for any matter specified in section 77I(a) to (i) that is operative in the AUP when the Auckland housing planning instrument (PC120) is notified

Standard sec 32 steps	Plus clause 8 Schedule 3C steps
Issue Define the problem- provide overview/ summary providing an analysis of the qualifying matter	Identify whether an area is subject to an existing qualifying matter (a qualifying matter referred to in clause 8(1)(a) of Schedule 3C of the RMA that is operative in the AUP when the Auckland housing planning instrument (PC120) is notified) and describe the existing qualifying matter. Identify by location (for example, by mapping) where an existing qualifying matter applies.
Identify and discuss objectives / outcomes	Identify relevant RPS / district level objectives and policies. Specify the alternative heights or densities (as relevant) proposed for those the area where the existing qualifying matter applies.
Identify and screen response options	Consider a range of reasonably practicable options for achieving the objectives including alternative standards or methods for these areas having considered the particular requirements in clause 4(1)(b) or (c) of Schedule 3C of the RMA or Policy 3 of the NPS-UD and assess the efficiency and effectiveness of the provisions.
Collect information on the selected option(s)	Describe in general terms for a typical site in the identified areas the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been provided by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD.
Evaluate option(s) - environmental, social, economic, cultural benefits and costs	Provide an assessment of the benefits and costs of the options in the light of the new objectives introduced by the NPS-UD relating to well-functioning urban environments.
Overall judgement as to the better option (taking into account risks of acting or not acting)	Conclusion as to the implications of the qualifying matter for development capacity to be enabled by NPS-UD in the areas where the qualifying matter applies.

3 Issues

12. The qualifying matter being evaluated is the ONFL qualifying matter which seeks to protect ONFL from inappropriate subdivision, use and development.
13. The protection of ONFL from inappropriate subdivision, use and development is a matter of national importance under section 6(b) of the RMA. ONFL is a matter that is identified as a qualifying matter under section 77I(a) of the RMA in accordance with Schedule 3C cls.8(1)(a) of the RMA. It is operative in the AUP when the Auckland housing instrument is notified and applies to a wide range of zones throughout Auckland, including residential and non-residential urban zones.
14. ONFL are found throughout the Auckland Region across a range of different zones and locations. They are shown on the AUP Planning Maps.
15. Of the 89 Outstanding Natural Landscapes (**ONL**) across greater Auckland, there are two ONL within the area of Auckland that is the focus of PC120, namely:
 - a. Mangemangeroa Creek Escarpment (Shelly Park / Howick & Whitford) (ONL 71); and
 - b. Waitākere Ranges & Coastline (Waitakere foothills, Swanson, Henderson Valley & Titirangi) (ONL 73).
16. All of the sites within the ONL at Mangemangeroa Creek Escarpment are proposed to be retained in the Single House (**SH**) zone. Approximately 6 sites within the Waitākere Ranges & Coastline ONL just to the west of Sunnyvale Train Station will retain their operative MHS zoning, with the remaining residential sites under this overlay retaining their SH zoning.
17. By contrast, there are a number of Outstanding Natural Features (**ONF**) within the area of Auckland that is the focus of PC120. These ONF include features such as craters, lava caves and volcanic cones. PC120 proposes to change the residential zoning of a number of sites that are also over or within ONF. This includes some residential sites around the edge of the Ōrākei Basin and Lake Pupuke, for example.
18. The aspects of development that can put pressure on the values associated with ONFL include activities such as the construction of new buildings; additions to existing buildings; earthworks; and vegetation management.
19. The key issue that arises in respect of the ONFL Qualifying Matter is whether, and to what extent, the level of development specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD is appropriate within ONFL.
20. PC120 will enable greater levels of development within the following locations/areas:
 - a. walkable catchments of the Maungawhau, Kingsland, Morningside, Baldwin Ave and Mt Albert Stations.¹
 - b. walkable catchments of:²
 - i. existing and planned rapid transit stops; and

¹ RMA Schedule 3C clause 4(1)(b) and (c)

² NPS-UD Policy 3(c)

- ii. the edge of city centre zones and metropolitan centre zones.
- c. within and adjacent to:³
 - i. Neighbourhood centre zones;
 - ii. Local centre zones; and
 - iii. Town centre zones.
- d. urban zoned land within the area that is subject to PC120 not otherwise captured in the scenarios above.

21. The extent of development enabled in the above areas has the potential to adversely affect the values of ONFL.

22. The AUP identifies ONFL on the planning maps. A range of provisions in the AUP seek to protect these areas by avoiding the adverse effects of subdivision, use and development. A breakdown of the zoning of the land which is within the ONFL overlays within the Auckland Region is set out in the tables and figures below.⁴

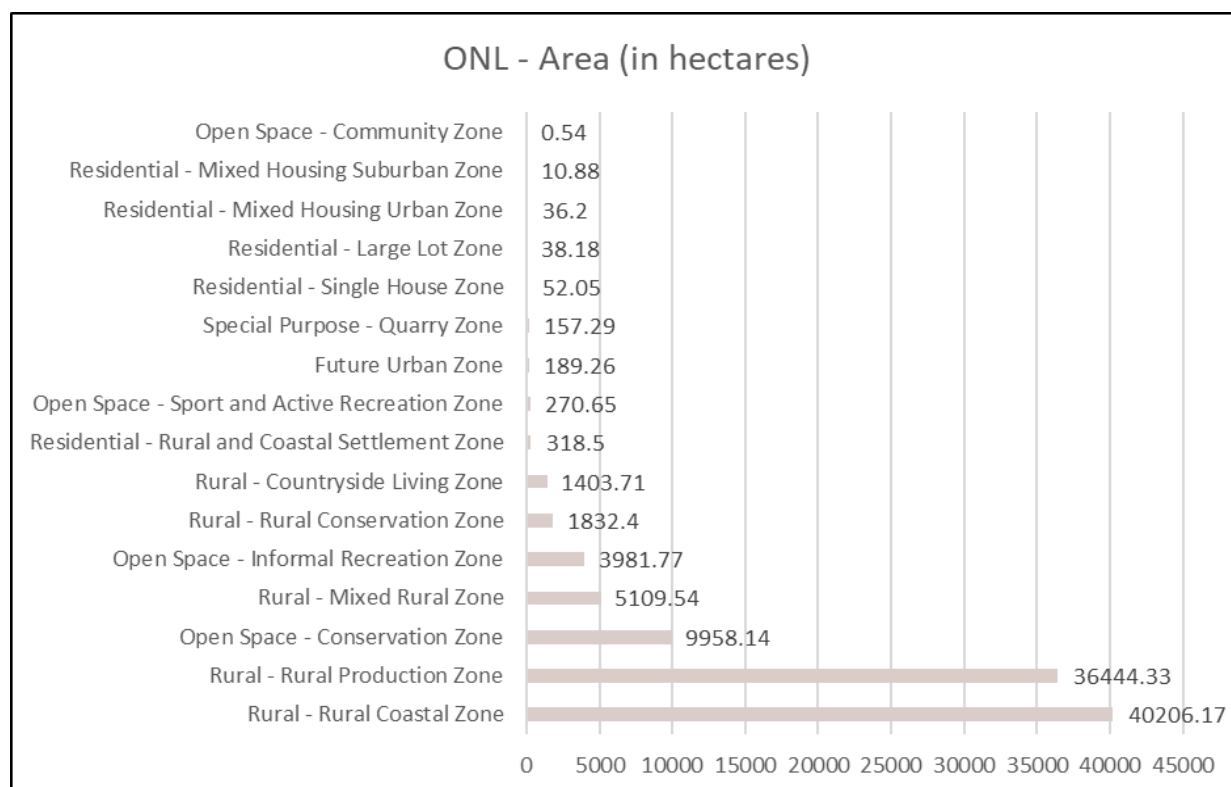
Table 2: PC120 zoning of land within the ONL overlay within the Auckland Region

Zone	Area of ONL within zone (ha)	% of ONL within zone
Rural - Rural Coastal Zone	40206.17	40.202%
Rural - Rural Production Zone	36444.33	36.441%
Open Space - Conservation Zone	9958.14	9.957%
Rural - Mixed Rural Zone	5109.54	5.109%
Open Space - Informal Recreation Zone	3981.77	3.981%
Rural - Rural Conservation Zone	1832.4	1.832%
Rural - Countryside Living Zone	1403.71	1.404%
Residential - Rural and Coastal Settlement Zone	318.5	0.318%
Open Space - Sport and Active Recreation Zone	270.65	0.271%
Future Urban Zone	189.26	0.189%
Special Purpose - Quarry Zone	157.29	0.157%
Residential - Single House Zone	52.05	0.052%
Residential - Large Lot Zone	38.18	0.038%
Residential - Mixed Housing Urban Zone	36.2	0.036%
Residential - Mixed Housing Suburban Zone	10.88	0.011%
Open Space - Community Zone	0.54	0.001%
TOTALS	100,009.61	100%

³ NPS-UD Policy 3(d)

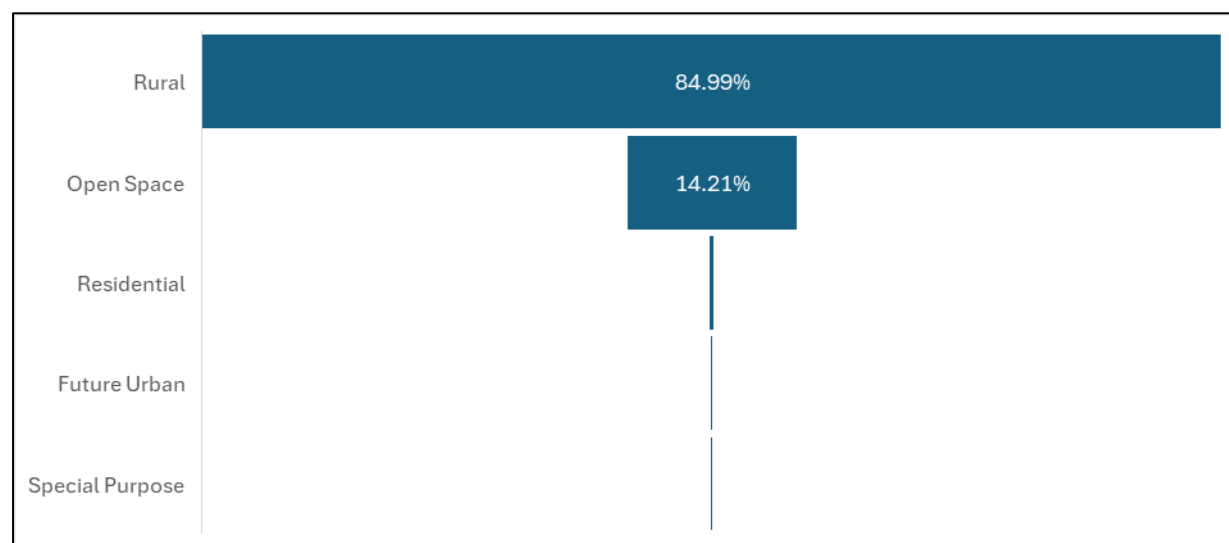
⁴ As per GIS data extracted as at 8 September 2025

Figure 1: PC120 zoning of land within the ONF overlay within the Auckland Region



23. The above data demonstrates that just over 85% of the total area of ONL in the Auckland is within rural zoned land as per the zoning proposed by PC120, and 14% in Open Space zoned land. Of the remaining 0.8% of ONL, 0.46% is in Residential zoned land; 0.19% in the Future Urban zone, and 0.16% in the Special Purpose zone.⁵

Figure 3: Summary of the PC120 zoning of land within the ONL overlay within the Auckland Region (by zone type)

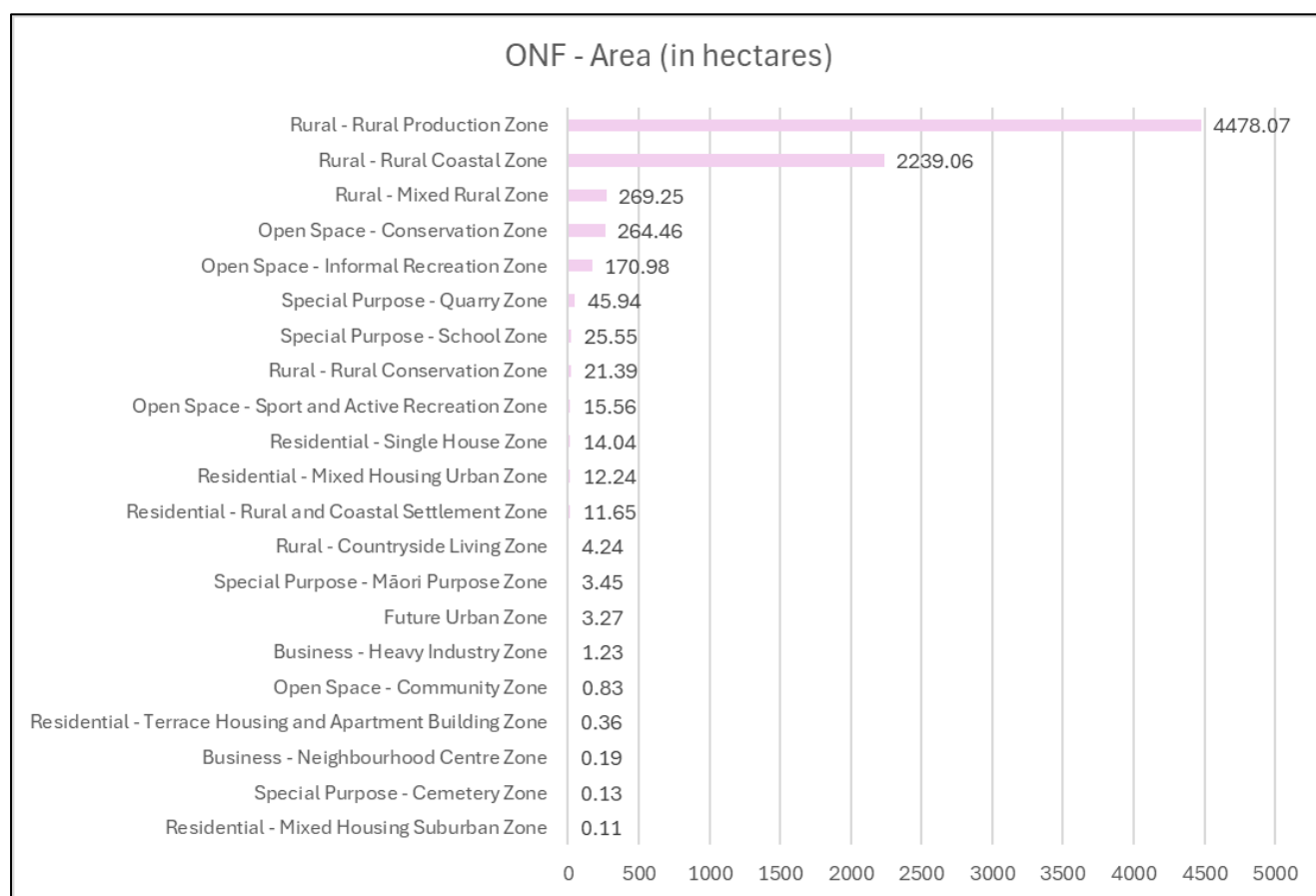


⁵ As per GIS data extracted as at 8 September 2025

Table 4: PC120 zoning of land within the ONF overlay within the Auckland Region

Zone	Area of ONL within zone (ha)	% of zone within ONL
Rural - Rural Production Zone	4478.07	59.062%
Rural - Rural Coastal Zone	2239.06	29.531%
Rural - Mixed Rural Zone	269.25	3.551%
Open Space - Conservation Zone	264.46	3.488%
Open Space - Informal Recreation Zone	170.98	2.255%
Special Purpose - Quarry Zone	45.94	0.606%
Special Purpose - School Zone	25.55	0.337%
Rural - Rural Conservation Zone	21.39	0.282%
Open Space - Sport and Active Recreation Zone	15.56	0.205%
Residential - Single House Zone	14.04	0.185%
Residential - Mixed Housing Urban Zone	12.24	0.161%
Residential - Rural and Coastal Settlement Zone	11.65	0.154%
Rural - Countryside Living Zone	4.24	0.056%
Special Purpose - Māori Purpose Zone	3.45	0.046%
Future Urban Zone	3.27	0.043%
Business - Heavy Industry Zone	1.23	0.016%
Open Space - Community Zone	0.83	0.011%
Residential - Terrace Housing and Apartment Building Zone	0.36	0.005%
Business - Neighbourhood Centre Zone	0.19	0.003%
Special Purpose - Cemetery Zone	0.13	0.002%
Residential - Mixed Housing Suburban Zone	0.11	0.001%
TOTALS	7582ha	100%

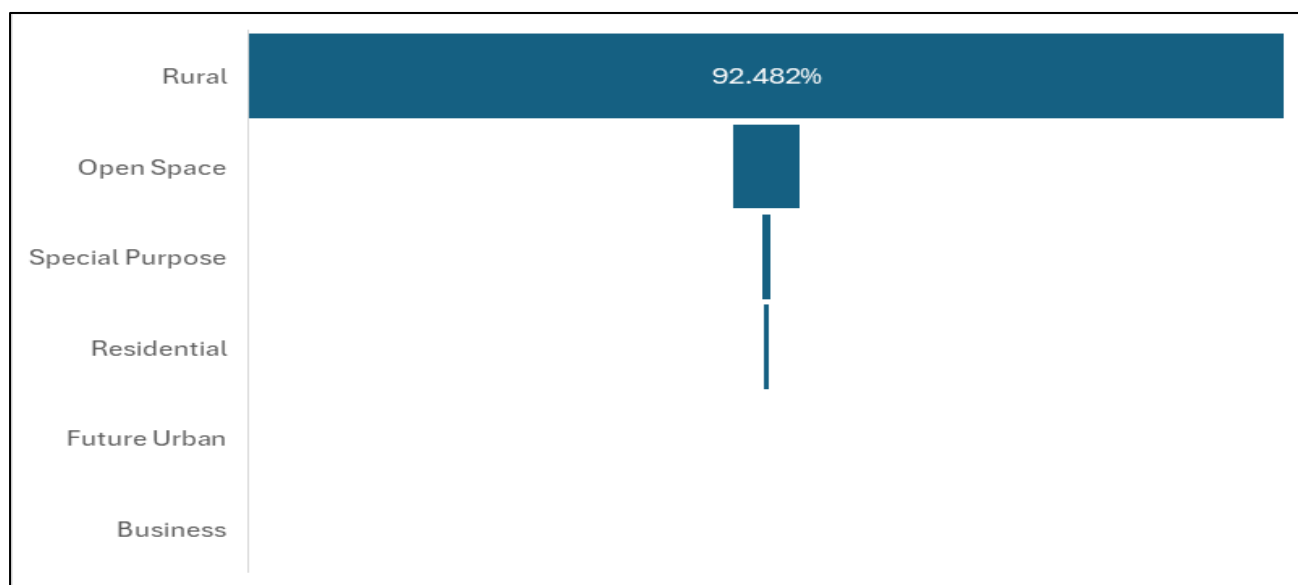
Figure 2: Summary of the PC120 zoning of land within the ONF overlay within the Auckland Region



24. The above data demonstrates that just over 92% of the total area of ONF in the Auckland is within Rural zoned land as per the zoning proposed by PC120, and 6% in Open Space zoned land. Of the remaining 1.55% of ONF, 0.99% is in the Special Purpose zone; 0.506% in the Residential zones; 0.043% in the Future Urban zone; and 0.019% is in the Business zones.⁶

⁶ As per GIS data extracted as at 8 September 2025

Figure 3: Summary of the PC120 zoning of land within the ONL overlay within the Auckland Region (by zone type)



25. An overview of the Auckland Regional Policy Statement (**RPS**) and District Plan objectives and policies that relate to the ONFL Overlay is set out below.

Regional and district plan provisions

26. Provisions in Chapter D10 of the AUP set out regional and district plan objectives, policies and methods to give effect to the RPS direction in relation to ONFL.
27. Activity Table D10.4.2 sets out the activity status of a range of activities depending on the type of ONF that they relate to. Table D10.4.1 describes the different types of ONF. Most of the activities managed under this table relate to rural activities, which are not relevant to PC120 given its urban focus.
28. Buildings and structures within ONF generally trigger the requirement for either a restricted discretionary or non-complying activity as summarised in the table below. Buildings and structures are only provided for as a permitted activity in respect of Feature code A1 – large landforms in working rural environments. There are no standards that apply to development affecting ONFL in Chapter D10.

Code	Type	Activity status for buildings and structures
A	Large landforms	Restricted discretionary
V (V1 and V2)	Large volcanic landforms	Restricted discretionary
B	Smaller more fragile landforms	Non-complying
C	Dynamic landforms and features	Non-complying
D	Exposures of geological material	Non-complying

Code	Type	Activity status for buildings and structures
E	Fragile exposures of geological material	Non-complying
F	Caves	F1 – Non-complying F2 – Restricted discretionary

29. Chapter D11 of the AUP sets out regional and district plan objectives, policies and methods that relate to areas of Outstanding and High Natural Character. Activity Table D11.4.1 sets out the activity status of a range of activities as they relate to ONL. By way of summary:

- a. Additions to existing buildings or structures are provided for as a permitted activity subject to complying with a standard that manages the height and visual impact of buildings.⁷ The standard requires that additions to existing buildings in an ONL:
 - i. Shall not exceed a total GFA of 50m².
 - ii. Shall not exceed 5m in height.
 - iii. Shall have an exterior finish that achieves certain reflective and colour requirements.
- b. Additions and alterations that do not comply with the above standard are a restricted discretionary activity. All other buildings require consent as a discretionary activity.

30. Non-urban activities such as farming, forestry, viticulture and landfills, cleanfills and managed fills are also managed under Activity Table D11.4.1 but are of less relevance to PC120 given its predominantly urban focus.

31. A number of the Auckland-wide chapters contain rules that specifically relate to ONFL – Chapter E12 Land Disturbance (District); E15 Vegetation Management and Biodiversity; and E26 Infrastructure.

Land disturbance

32. Within Chapter E12, Activity Table E12.4.2 sets out the activity status of land disturbance within all overlays except the ONF overlay. The activity status of land disturbance in the ONF overlay is set out in Activity Table E12.4.3 and varies according to the types of ONF. Generally, in both activity tables, earthworks are provided for on a relatively limited basis with up to 50m²/5m³ as a permitted activity in an ONL and very limited levels of land disturbance provided for as a permitted activity where it affects ONF. Permitted, controlled, and restricted discretionary activities also have to comply with a range of standards.

Vegetation management

33. Vegetation management is addressed in Chapter E15, and the activity status of activities within overlays including ONFL are set out in Activity Table E15.4.2. The

⁷ AUP(OP) Activity Table D11.4.1(A9) – (A12)

removal of up to 25m³ of contiguous indigenous vegetation in ONF is a permitted activity, and any clearance greater than that requires consent as a restricted discretionary activity. The removal of up to 50m³ is provided for as a permitted activity in ONL, otherwise consent as a restricted discretionary activity is required. There is a range of circumstances in which vegetation removal in both ONFL could be a permitted activity, as set out in the Activity Table.

34. Chapter E26 Infrastructure contains a series of Activity Tables, with specific ones relating to the various overlays in the AUP(OP), including one for ONF (E26.14) and one for ONL (E26.13). In general, certain limited, small scale infrastructure-related activities are provided for as permitted activities, but other types of activities range from restricted discretionary to non-complying.

Summary – management approach to ONFL

35. In summary, the management approach in the AUP to the ONFL qualifying matter includes:
- identification of ONFL in schedules 6 & 7 of the AUP(OP);
 - identification of the extent of ONFL on the planning maps;
 - activity rules managing buildings and structures in Chapters D10 (ONL) and D11 (ONF)
 - activity rules managing land disturbance, vegetation management, and infrastructure in Chapters E12, E15 and E26 respectively.
36. Very limited development is provided for within ONFL under the above management approach. This approach in the AUP was extensively addressed through the Proposed AUP hearings process 2014 – 2016.

4 Objectives and Policies (existing)

37. The relevant AUP objectives and policies that support the ONFL qualifying matter are set out in the table below.

Table 5: Operative AUP objectives and policies that support the ONFL qualifying matter

AUP Chapter	Objective / Policy	Summary of matter addressed
Regional Policy Statement B4.2 Objectives Outstanding natural features and landscapes	(1) Outstanding natural features and landscapes are identified and protected from inappropriate subdivision, use and development.	Seeking to protect ONFL from inappropriate subdivision, use and development.
	(2) The ancestral relationships of Mana Whenua and their culture and traditions with the landscapes and natural features of Auckland are recognised and provided for.	Recognise and provide for ancestral relationships of mana whenua with ONFL.

AUP Chapter	Objective / Policy	Summary of matter addressed
	(3) The visual and physical integrity and the historic, archaeological and cultural values of Auckland's volcanic features that are of local, regional, national and/or international significance are protected and, where practicable, enhanced.	Protect various values of Auckland's volcanic features that are of local, regional, national, and/or international significance.
Regional Policy Statement B4.2.2. Policies Identify, evaluate and protect outstanding natural landscape	(1) Identify and evaluate a place as an outstanding natural landscape considering the following factors: (a) natural science factors: geology, topography, hydrology, vegetation cover, ecology and natural processes; (b) expressiveness/legibility: including the degree to which the landscape reveals its formative processes; (c) aesthetic values and memorability: including landmarks and significant views; (d) perceptions of naturalness: related to human influences, the presence of buildings and structures or landform modification; (e) transient landscape values: including those related to natural processes, such as seasonal change and the presence of wildlife; (f) shared and recognised values: including the public profile and recognition of particular landscapes; (g) Mana Whenua: the value of the landscape to Mana Whenua;	Criteria that will be used to identify and evaluate ONL.

AUP Chapter	Objective / Policy	Summary of matter addressed
	(h) historical: the landscape's known historical associations	
	(2) Include a place identified as an outstanding natural landscape in Schedule 7 Outstanding Natural Landscapes Overlay Schedule.	Include ONL in Schedule 7.
	(3) Protect the physical and visual integrity of Auckland's outstanding natural landscapes from inappropriate subdivision, use and development.	Management outcome for ONL – protect from inappropriate subdivision, use and development (reflects section 6(b) of the RMA).
	(4) Identify and evaluate a place as an outstanding natural feature considering the following factors: (a) the extent to which the landform, feature or geological site contributes to the understanding of the geology or evolution of the biota in the region, New Zealand or the earth, including type localities of rock formations, minerals and fossils; (b) the rarity or unusual nature of the site or feature; (c) the extent to which the feature is an outstanding representative example of the diversity of Auckland's natural landforms and geological features; (d) the extent to which the landform, geological feature or site is part of a recognisable group of features; (e) the extent to which the landform, geological feature or site contributes to the value of the wider landscape;	Criteria that will be used to identify and evaluate ONF.

AUP Chapter	Objective / Policy	Summary of matter addressed
	(f) the extent of community association with, or public appreciation of, the values of the feature or site; (g) the potential value of the feature or site for public education; (h) the potential value of the feature or site to provide additional understanding of the geological or biotic history; (i) the state of preservation of the feature or site; (j) the extent to which a feature or site is associated with an historically important natural event, geologically related industry, or individual involved in earth science research; (k) the importance of the feature or site to Mana Whenua. (5) Include a place identified as an outstanding natural feature in Schedule 6 Outstanding Natural Features Overlay Schedule.	Include ONF in Schedule 6.
	(6) Protect the physical and visual integrity of Auckland's outstanding natural features from inappropriate subdivision, use and development.	Management outcome for ONL – protect from inappropriate subdivision, use and development (reflects section 6(b) of the RMA).
	(7) Protect the historic, archaeological and cultural integrity of regionally significant volcanic features and their surrounds.	Protect various values of Auckland's significant volcanic features.
	(8) Manage outstanding natural landscapes and outstanding natural features in an integrated manner to protect and, where practicable and appropriate, enhance their values.	

AUP Chapter	Objective / Policy	Summary of matter addressed
D10.2. Objectives [rcp/dp]	(1) Auckland's outstanding natural features and outstanding natural landscapes are protected from inappropriate subdivision, use, and development.	Seeking to protect ONFL from inappropriate subdivision, use and development.
	(2) The ancestral relationships of Mana Whenua with outstanding natural features and outstanding natural landscapes are recognised and provided for	Recognise and provide for ancestral relationships of mana whenua with ONFL.
	(3) Where practicable the restoration and enhancement of outstanding natural features and outstanding natural landscapes, including in the Waitākere Ranges Heritage Area and the Hauraki Gulf /Te Moana-nui o Toi/Tīkapa Moana, is promoted.	Promote the restoration and enhancement of ONFL.
	(4) Existing rural production activities are recognised as part of landscape values including in outstanding natural features and outstanding natural landscapes.	Recognition of existing rural production activities as part of the landscape values in some ONFL.
D10.3. Policies [rcp/dp]	(1) Protect the physical and visual integrity of outstanding natural landscapes by: (a) avoiding the adverse effects of inappropriate subdivision, use and development on the natural characteristics and qualities that contribute to the values of the outstanding natural landscape; (b) maintaining the visual coherence and integrity of the outstanding natural landscape; (c) maintaining natural landforms, natural processes	How the physical and visual integrity of ONL will be protected.

AUP Chapter	Objective / Policy	Summary of matter addressed
	and vegetation areas and patterns; (d) maintaining the visual or physical qualities that make the landscape iconic or rare; and (e) maintaining high levels of naturalness in outstanding natural landscapes that are also identified as outstanding natural character or high natural character areas.	
	(2) Protect the physical and visual integrity of outstanding natural landscapes while taking into account the following matters: (a) the extent of anthropogenic changes to the natural elements, patterns, processes or characteristics and qualities; (b) the presence or absence of structures, buildings or infrastructure; (c) the temporary or permanent nature of any adverse effects; (d) the physical and visual integrity and the natural processes of the location; (e) the physical, visual and experiential values that contribute significantly to the natural landscape's values; (f) the location, scale and design of any proposed development; and (g) the functional or operational need of any proposed infrastructure to be located in the outstanding natural landscape area.	Matters that should be taken into account when assessing proposals that affect ONL.
	(3) Protect the physical and visual integrity of outstanding natural features, including volcanic features that are	How the physical and visual integrity of ONF will be protected.

AUP Chapter	Objective / Policy	Summary of matter addressed
	outstanding natural features, by: (a) avoiding the adverse effects of inappropriate subdivision, use and development on the natural characteristics and qualities that contribute to an outstanding natural feature's values; (b) ensuring that the provision for, and upgrading of, public access, recreation and infrastructure is consistent with the protection of the values of an outstanding natural feature; and (c) avoiding adverse effects on Mana Whenua values associated with an outstanding natural feature.	
	(4) Protect the physical and visual integrity of outstanding natural features, while taking into account the following matters: (a) the value of the outstanding natural feature in its wider historic heritage, cultural, landscape, natural character and amenity context; (b) the educational, scientific, amenity, social or economic value of the outstanding natural feature; (c) the historical, cultural and spiritual association with the outstanding natural feature held by Mana Whenua; (d) the extent of anthropogenic changes to the natural characteristics and qualities of the outstanding natural feature; (e) the presence or absence of structures, buildings or infrastructure;	Matters that should be taken into account when assessing proposals that affect ONF.

AUP Chapter	Objective / Policy	Summary of matter addressed
	(f) the temporary or permanent nature of any adverse effects; (g) the physical and visual integrity and the natural processes of the location; (h) the physical, visual and experiential values that contribute significantly to the outstanding natural feature's values; (i) the location, scale and design of any proposed subdivision, use or development; and (j) the functional or operational need of any proposed infrastructure to be located within the outstanding natural feature.	
	(5) Enable use and development that maintains or enhances the values or appreciation of an outstanding natural landscape or outstanding natural feature.	Enabling use that maintains or enhances the values of ONFL.
	(6) Provide for appropriate rural production activities and related production structures as part of working rural and coastal landscapes in outstanding natural landscape and outstanding natural feature areas.	Providing for appropriate rural production activities.
	(7) Encourage the restoration and enhancement of outstanding natural landscapes and outstanding natural features where practical, and where this is consistent with the values of the feature or area.	Encouraging restoration and enhancement.

38. In summary, a number of objectives and policies in the RPS relate to ONFL and are set out in Section B4.2 of the RPS. Policies under section B4.2.2 set out the criteria

for identifying ONFL, and that places that meet these criteria should be included in the relevant Schedules (Schedule 7 for ONLs and Schedule 6 for ONFs).

39. Related policies seek to protect the physical and visual integrity of ONFL from inappropriate subdivision, use and development;⁸ and protect the integrity of regionally significant volcanic features and their surrounds.⁹ The RPS seeks that ONFL are managed in an integrated manner to protect and, where practicable and appropriate, enhance their values.¹⁰

Regional and district plan provisions

40. Provisions in Chapter D10 of the AUP set out regional and district plan objectives, policies and methods to give effect to the RPS direction in relation to ONFL.
41. The Council considers that the ONFL qualifying matter applies to the area that is the subject of PC120 due to the extent of development that is anticipated to be provided for in order to give effect to clauses 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD.
42. It is proposed to continue to rely on the overlay provisions for the ONFL as the preferred method to manage the potential effects of the level of increased development enabled by clauses 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD on ONFL within the area that is the subject of PC120.

5 Development of Options

43. Section 32 of the RMA requires an examination of the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The overall objective (purpose of the proposal) of 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 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

⁸ AUP(OP) Policies B4.2.2(3) & (6)

⁹ AUP(OP) Policies B4.2.2(7)

¹⁰ AUP(OP) Policy B4.2.2(8)

catchments of Maungawhau (Mount Eden), 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.

44. Section 32 requires a range of options to be considered.

45. The options that have been evaluated in the section 32 and Schedule 3C assessment of the ONFL qualifying matter are:

- a. **Option 1:** Apply SH zone to all residential sites within ONF and ONL overlay and continue to rely on existing provisions that manage ONF and ONL.
- b. **Option 2:** Apply zoning to give effect to NPS-UD and Schedule 3C, rely on existing provisions that manage ONF and ONL
- c. **Option 3:** Apply zoning to give effect to NPS-UD and Schedule 3C, strengthen the existing provisions that manage ONF and ONL.

46. An option of removing all provisions that manage ONFL has not been considered as this would fail to fulfil the Council's obligations under Section 6(b) of the RMA.

5.1 Consequences for development capacity

47. The consequences for the provision of development capacity by accommodating the ONFL qualifying matter are that the ultimate scale, height, and level of intensity of built and urbanised development on land within the ONFL may be constrained by the requirement to ensure that the values of ONFL are protected from inappropriate subdivision, use and development.

48. It is not expected that the ongoing management of ONL values will have an impact on the overall development capacity enabled under PC120 given that the number of sites within the ONL in the area that is the subject of PC120 is so small. Any future development on these sites will continue to be subject to the operative provisions of D10, D11, E12, E15 and E26, noting that new buildings in an ONL require consent as a discretionary activity which enables a case-by-case examination of development proposals against the site-specific values present. There is the potential for the level of development that is appropriate to protect ONL values to be less than would otherwise be enabled if those values were not present (or not managed).

49. There is a greater potential for the ongoing management of ONF values to affect the overall development capacity that could otherwise be enabled under PC120 if ONF values were no longer managed given the greater presence of ONF through urban Auckland (and assuming development was otherwise unimpeded by other constraints such as infrastructure capacity or natural hazards). Table 6 below

summarises the total area of land and number of sites within the various listed zones as proposed by PC120.¹¹

Table 6: Summary of total area and number of sites within ONF as proposed by PC120

Zone	Area within ONF (ha)	Total area of zone (ha)	Number of sites within ONF	Total number of sites in zone
Residential – Single House	14.04	6720.3	100	71,060
Residential – Mixed Housing Suburban	0.11	6598.5	1	82,683
Residential – Mixed Housing Urban	12.24	15027.1	156	238,833
Residential - THAB	0.36	6140.6	3	123,143
Residential – other	11.65	4762.4	41	13,352
Business (all types)	1.42	8813.9	15	57,798
Open Space (all types)	451.83	44,940.9	402	7853
Special Purpose (all types)	75.07	4805.3	10	1719
Future Urban	3.27	9592.8	1	6347
Rural (all types)	7012.01	311,245.1	290	32,806
TOTALS	7582		1019	

50. As set out above:

- a. There are three sites within the THAB zone that are also within the ONF overlay. Collectively, these sites represent 0.01% of the total area of THAB zoned land (by area); and 0.002% of the sites in the zone.
- b. There are 156 sites within the MHU zone that are also within the ONF overlay. Collectively these sites represent 0.08% of the total area of MHU zoned land (by area); and 0.07% of the sites in the zone
- c. There is 1 site within the MHS zone that is also within the ONF overlay. This site represents 0.002% of the total area of MHS zoned land (by area); and 0.001% of the sites in the zone.
- d. The majority of residentially zoned sites that are also in the ONF overlay are in the SH zone (100 sites). Collectively these sites represent 0.21% of the total area of SH zoned land (by area); and 0.14% of the sites in the zone.

51. Further development on these residentially zoned sites will likely be constrained as a result of the provisions that relate to land within the ONF overlay; and the extent to which the development enabled in the various residential zones as it applies to these sites is inconsistent with the protection of the site-specific values present on these

¹¹ As per GIS data extracted as at 8 September 2025

sites. The impact on development capacity is likely to be greatest in respect of sites in the THAB zone, and of least impact on sites in the SH zone. However, in the wider context of the land within the residential zones across Auckland, this impact will be very slight.

5.2 Evaluation of options

52. To determine the most appropriate response for ONFL as a qualifying matter, each of the options needs to be evaluated in the context of the objectives of clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD. This evaluation is set out in Table 7 below.

Table 7: Evaluation of options

Qualifying matter – ONF & ONL	Option 1 – Apply SHZ to all residential sites within ONF and ONL overlay and continue to rely on existing provisions that manage ONF and ONL.	Option 2 – Apply zoning to give effect to NPS-UD and Schedule 3C, rely on existing provisions that manage ONF and ONL	Option 3 - Apply zoning to give effect to NPS-UD and Schedule 3C, strengthen the existing provisions that manage ONF and ONL.
Costs			
Costs: housing supply / capacity	Applying the SH zone to all residential sites within ONF and ONL areas has the potential to reduce the overall housing supply/capacity where it might not be necessary strictly to protect ONF or ONL values. There may be on-site flexibility to accommodate additional capacity even if ONF or ONL values are present which would otherwise be precluded. This option is considered to be a relatively high cost overall when compared to Options 2 and 3, but low in the wider context of Auckland's overall housing capacity and supply given the extremely small extent of residentially zoned land within the ONFL overlays.	Applying the relevant residential zoning to give effect to NPS-UD Policy 3 and Clause 4 of Schedule 3C would likely enable greater development potential in Auckland generally, including on some sites within the ONFL overlay. Continuing to rely on the existing provisions that seek to protect ONFL from inappropriate subdivision, use and development would enable a balance to be struck on a case-by-case basis as to the appropriate level of development on a site while protecting the ONFL values present. This option is considered to be a relatively low cost overall when compared to Options 1 and 3, but low in the wider context of Auckland's overall housing capacity and supply given the extremely small extent of residentially zoned land within the ONFL overlays.	Applying the relevant residential zoning to give effect to NPS-UD Policy 3 and Clause 4 of Schedule 3C would likely enable greater development potential in Auckland generally, including on some sites within the ONFL overlay. Strengthening the existing provisions that manage ONFL could include changing the activity status that relates to development affecting ONFL; introducing new standards; amending the policy framework; and amending the assessment matters. Assuming such changes would be more restrictive (strengthened), it is presumed that such changes could result more costs on housing supply / capacity than Option 2, but possibly not to the extent of Option 1. This option is considered to be a relatively medium cost overall when compared to Options 1 and 2, but low in the

Qualifying matter – ONF & ONL	Option 1 – Apply SHZ to all residential sites within ONF and ONL overlay and continue to rely on existing provisions that manage ONF and ONL.	Option 2 – Apply zoning to give effect to NPS-UD and Schedule 3C, rely on existing provisions that manage ONF and ONL	Option 3 - Apply zoning to give effect to NPS-UD and Schedule 3C, strengthen the existing provisions that manage ONF and ONL.
			wider context of Auckland's overall housing capacity and supply given the extremely small extent of residentially zoned land within the ONFL overlays.
Costs: Social	No social costs are anticipated in relation to Option 1 beyond the potential social costs that can arise from housing supply/capacity issues as outlined above; and from environmental costs as outlined below.	No social costs are anticipated in relation to Option 2 beyond the potential social costs that can arise from housing supply/capacity issues as outlined above; and from environmental costs as outlined below.	No social costs are anticipated in relation to Option 3 beyond the potential social costs that can arise from housing supply/capacity issues as outlined above; and from environmental costs as outlined below.
Costs: Economic (not otherwise covered by housing capacity issues)	Option 1 could result in relatively limited economic costs related to levels of resource consent activity falling to applicants and council (and ratepayers) than could otherwise arise from Options 2 and 3.	Option 2 could result in economic costs related to slightly higher levels of resource consent activity falling to applicants and council (and ratepayers) that are somewhat greater than could otherwise arise from Option 1.	Option 3 could result in economic costs related to slightly higher levels of resource consent activity falling to applicants and council (and ratepayers) that are somewhat greater than could otherwise arise from Option 1. Option 3 would also come with attendant costs to the council (and ratepayers) associated with addressing the changes to the provisions through this plan change process.
Costs: Environmental	There is the potential for Option 1 to result in relatively lower environmental costs than Options 2 and 3 if the Single House zone were to be applied to all sites with ONFL values present. This is because a very low level of residential development would be enabled on these sites.	There is the potential for Options 2 and 3 to result in slightly greater environmental costs than Option 1 due to a greater level of theoretical development potential being enabled. However, given the strength of the existing overlay provisions; the limited overall extent of residential land in the ONFL overlay; and the variability of the ONFL values between sites this difference may be relatively limited.	There is the potential for Options 2 and 3 to result in slightly greater environmental costs than Option 1 due to a greater level of theoretical development potential being enabled. However, given the strength of the existing overlay provisions; the limited overall extent of residential land in the ONFL overlay; and the variability of the ONFL values between sites this difference may be relatively limited.

Qualifying matter – ONF & ONL	Option 1 – Apply SHZ to all residential sites within ONF and ONL overlay and continue to rely on existing provisions that manage ONF and ONL.	Option 2 – Apply zoning to give effect to NPS-UD and Schedule 3C, rely on existing provisions that manage ONF and ONL	Option 3 - Apply zoning to give effect to NPS-UD and Schedule 3C, strengthen the existing provisions that manage ONF and ONL.
Benefits			
Benefits of applying the QM - social	No direct social benefits are anticipated in relation to Option 1 beyond the potential social benefits that can arise from the economic and environmental benefits as outlined below.	No direct social benefits are anticipated in relation to Option 2 beyond the potential social benefits that can arise from the economic and environmental benefits as outlined below.	No direct social benefits are anticipated in relation to Option 3 beyond the potential social benefits that can arise from the economic and environmental benefits as outlined below.
Benefits - economic	Option 1 would likely result in relatively low economic benefits to landowners as they could potentially realise a lower level of development capacity on their land than may otherwise be available under Options 1 and 2. This is considered to be a relatively low benefit overall when compared to Options 2 and 3.	Option 2 could result in some economic benefits to landowners as they could potentially realise a greater level of development capacity on their land than may otherwise be available under Option 1. Given the strength of the existing overlay provisions, this option could be similar to Option 3. Options 2 and 3 are considered to have relatively similar benefits.	Option 3 could result in some economic benefits to landowners as they could potentially realise a greater level of development capacity on their land than may otherwise be available under Option 1. Given the strength of the existing overlay provisions, this option could be similar to Option 2. Options 2 and 3 are considered to have relatively similar benefits.
Benefits – environmental	There is the potential for Option 1 to result in relatively higher environmental benefits than Options 2 and 3 if the Single House zone were to be applied to all sites with ONFL values present. This is because a very low level of residential development would be enabled on these sites.	There is the potential for Options 2 and 3 to result in slightly less environmental benefits than Option 1 due to a greater level of theoretical development potential being enabled. However given the strength of the existing overlay provisions and the variability of the ONFL values between sites this difference may be relatively limited.	There is the potential for Options 2 and 3 to result in slightly less environmental benefits than Option 1 due to a greater level of theoretical development potential being enabled. However given the strength of the existing overlay provisions and the variability of the ONFL values between sites this difference may be relatively limited.

5.2.1 Analysis

53. In light of the above analysis, Option 2 is the preferred option as it generally results in medium levels of costs and benefits as compared to Options 1 and 3.

5.2.2 Risks or acting or not acting

54. Section 32(2)(c) of the RMA requires this evaluation to assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

55. The ONFL are existing areas that have been scheduled in the AUP through a process under Schedule 1 of the RMA. The information, locations and extents of these places are considered certain and sufficient for their assessment as an existing qualifying matter.

5.2.3 Effectiveness and efficiency

56. The overall objective of PC120 is to give effect to the requirements of clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD. The RPS objectives for ONFL seek to protect these landscapes and features from inappropriate subdivision, use and development.
57. Given the extremely limited extent of residentially zoned land in the ONFL overlays; and in particular in the MHU and THAB zones, it is not efficient or effective to amend the response to apply clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD to land within these overlays, and is more efficient and effective to rely on the existing overlay and its attendant provisions to manage development on these sites.

5.3 Description of how the qualifying matter is to be implemented

58. The ONFL qualifying matter will continue to be implemented by relying on the existing provisions of the ONFL overlays.

5.4 Overall conclusion

59. The ONFL overlays are the primary mechanisms within the AUP for protecting outstanding natural features and landscapes from the adverse effects of subdivision, use and development, thereby responding directly to section 6(b) of the RMA.
60. The ONF overlay applies to a relatively small area of urban land within the region and affects only 0.3% of land in the SH, MHS, MHU and THAB zones combined. The ONL overlay applies to an extremely small area of urban land within the region, and affects 1.236% of land in the SH, MHS and MHU zones combined. There are no ONL values on land that is in the THAB zone.
61. Continuing to rely on the ONFL overlay provisions in the AUP will have a very minimal effect on the provision of housing capacity and supply but will support the protection of outstanding natural features and landscapes from the adverse effects of subdivision, use and development.

5.6 Information Used

Name of document, report, plan	How did it inform the development of the plan change
Operative Auckland Unitary Plan	Extent of ONFL in the planning maps. Details of the ONFL in the schedule. Provisions that relate to the management of activities in ONFL.
GIS data	Understanding the extent of ONFL within the Auckland Region, and the proposed zoning of land in these areas.
Plan Change 78 – Section 32 report for ONFL	Background to the approach that was taken in Plan Change 78 to the management of ONFL.

5.7 Consultation summary

The First Schedule to the RMA sets out the relevant consultation requirements.

Limited consultation on PC 120 has been undertaken, and this is detailed in the Auckland Council September 2025 reports entitled:

CONSULTATION AND ENGAGEMENT ON A PROPOSED PLAN CHANGE POTENTIALLY REPLACING PROPOSED PLAN CHANGE 78 – INTENSIFICATION SUMMARY REPORT.

MĀORI ENGAGEMENT CONSULTATION SUMMARY REPORT