



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:

Sites and Places of Significance to Mana Whenua

EVALUATION REPORT

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Executive Summary

1. The Sites and Places of Significance to Mana Whenua Overlay is the primary mechanism within the Auckland Unitary Plan (Operative in Part) (**AUP**) for recognising and protecting Māori cultural heritage within Tāmaki Makaurau. Currently the overlay protects a small proportion of Māori cultural heritage within the region. Each site is culturally unique making them a scarce resource.
2. The overlay provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga, thereby responding directly to section 6(e) of the Resource Management Act 1991 (**RMA**). Under section 771(a) of the RMA, the Sites and Places of Significance to Mana Whenua Overlay is a qualifying matter in accordance with Schedule 3C cls.8(1)(a) of the RMA.
3. The application of this qualifying matter will have a negligible effect on the provision of housing capacity and supply locally or within the region, but will allow people and communities to provide for their social and cultural wellbeing. There is no way to categorically determine how the application of the overlay may affect development outcomes on individual sites in the absence of specific development proposals.
4. A desktop analysis across 60 of 107 scheduled sites potentially affected by the intensification under Policy 3 of the National Policy Statement on Urban Development 2020 (updated 2022) (**NPS-UD**) or other areas of intensification proposed by the council has identified that most of the sites are either unlikely to be affected by development intensification, or are likely to be exempt from it (as they are open space or road sites). Notwithstanding, the overlay retains the ability for mana whenua to exercise their kaitiakitanga and rangatiratanga with respect to individual proposals on these sites.
5. Two scheduled urupā sites have been identified as relevant residential zones and likely to be intensified beyond their existing zoning of Residential - Single House Zone. Engagement with mana whenua representatives undertaken during the development of Plan Change 78 identified that intensification of these sites is likely to result in significant adverse cultural effects. As for that plan change, it is recommended that the operative zoning is retained for these two sites so as not to set up an inappropriate tension between the expectations of the overlay and the zone.
6. A third site sits on a Residential - Mixed Housing Suburban Zone site and is both an operational Anglican church and Māori Land under Te Ture Whenua Māori Land Act 1993. This plan change proposes that this site be upzoned to Residential - Mixed Housing Urban. This site is unlikely to be redeveloped in the medium to long term and other mitigating circumstances exist for this site resulting in it being unlikely that inappropriate development will occur on this site, regardless of the upzoning. A fourth site scheduled urupā site located partially within the Business – Mixed Use Zone, Business – Light Industrial Zone and road is already developed, making it unlikely that intensification under the plan change will result in inappropriate cultural effects. For these two sites, no zoning response is recommended although the overlay continues to apply.

7. The overall impact on housing supply and capacity because of enabling less intensification on the two residential sites is minimal from a local or regional perspective yet carries with it important Treaty of Waitangi partnership principles of kaitiakitanga and rangatiratanga, which must be considered under the legislation.

1. Introduction

8. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the RMA for PC120 to the AUP.
9. 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.
10. This report discusses the implications of applying the Sites and Places of Significance to Mana Whenua Overlay (**SSMW**) as a qualifying matter to the requirements of clause 4(1)(b) or (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 these culturally significant sites.
11. 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 any zone in an urban environment only to the extent necessary to accommodate one or more of the following qualifying matters that are present:
 - (a) a matter listed in section 77I(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.
12. 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.
13. 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.
14. 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 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.
15. This section 32 analysis draws from previous work undertaken during the development of the now withdrawn Plan Change 78 (**PC78**). PC78 was Auckland Council's Intensification Planning Instrument which gave effect to the NPS-UD and amendments to the RMA and which was notified in August 2022.

2. Integrated evaluation for existing qualifying matters

16. For the purposes of PC120, evaluation of the SSMW as a qualifying matter has been undertaken in an integrated way that combines section 32 and Schedule 3C of the RMA requirements. The report draws from work undertaken for PC78 and follows the evaluation approach described below.
17. The preparation of this report has involved the following:
- a) assessment of the AUP to identify any relevant provisions that apply to this qualifying matter,
 - b) identification of SSMW within the urban environment,
 - c) a review of the council records to identify the recorded cultural values applying to each of the potentially affected sites,
 - d) a review of the analysis undertaken for the proposal of SSMW as a qualifying matter under Plan Change 78. This analysis included an assessment of each of the sites by council planners and Māori heritage specialist staff to provide an initial risk assessment (November - December 2021),

- e) presentation of an initial risk assessment to mana whenua representatives at a hui for iwi/hapū consideration and feedback as part of the development of PC78 (December 2021),
- f) subsequent collective and individual hui, and email correspondence with mana whenua representatives to identify matters and sites of cultural concern with respect to the intensification outcomes sought by the NPS-UD originally for PC78 (December 2021 to February 2022),
- g) 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,
- h) review of the AUP to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter,
- i) review of the AUP planning maps to assess the spatial application of this qualifying matter,
- j) section 32 options analysis for this qualifying matter and related amendments,
- k) Collective and individual hui with mana whenua representatives in August and September 2025 which included a two-week engagement period on the draft plan change proposal (22 August to 5 September 2025),
- l) a summary of matters raised through engagement and how the plan change responded to these was circulated on 22 August 2025 (The Whakarāpoto). This included the proposed response to SSMW,
- m) presenting back to mana whenua representatives in October 2025 (ahead of notification of PC120) on how their advice had been considered with respect to this qualifying matter.

18. The scale and significance of the issues is assessed to be minor due to the confined nature of the matters being assessed and their likely impact on development capacity.

19. 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 section 32 steps	Plus clause 8 Schedule 3C steps for existing qualifying matters
Issue Define the problem- provide overview/summary providing an analysis of the qualifying matter	The qualifying matter is the SSMW. These sites and places identify, recognise and protect the tangible and intangible values of these sites to the mana whenua groups of Tāmaki Makaurau. Their protection provides for this ongoing cultural relationship. The sites meet some or all of the factors identified in Section B6.5.2(2) of the Auckland Regional Policy Statement (RPS). Each site and place holds its own set of specific values based on its local history and the mātauranga Māori¹ held by associated iwi and hapū. In many cases, tribal associations with these sites overlap in recognition of whakapapa, shared histories and layers of occupation and use over time. The sites potentially affected by Policy 3 and Frequent Transport Network Corridor intensification areas are identified in Attachment 1.
Identify and discuss objectives / outcomes	The relevant RPS objectives are B6.5.1(1) to (3). The relevant RPS policies are B6.5.2(1) to (5). SSMW is a qualifying matter as it manages the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga under section 6(e) of the RMA as a matter of national importance. Both the tangible and intangible qualities of culturally significant sites are to be identified, protected and enhanced. Over time, the AUP seeks to develop the knowledge base of mana whenua cultural heritage to address an under-representation within Tāmaki Makaurau. It is not possible to categorically determine how the application of the overlay may affect the heights and densities of building on individual sites as they would need to be assessed on a case-by-case basis in accordance with the tikanga of the affected mana whenua groups.
Identify and screen response options	Four options have been identified and evaluated for the SSMW as a qualifying matter. These are: • apply Policy 3 and the SSMW as it is currently operative across the region;

¹ Tribal knowledge

	• apply Policy 3 and do not apply SSMW as a qualifying matter; • apply Policy 3 in a modified form by identifying alternative density standards on the scheduled site locations; • apply the SSMW as is currently operative across the region and apply the currently operative zone provisions to two scheduled urupā sites subject to intensification. (Recommended option).
Collect information on the selected option(s)	The locations of scheduled sites within Policy 3 and Frequent Transport Network Corridor intensification areas have been identified in Attachment 1. These sites have been assessed considering advice received from mana whenua representatives both through the development of PC78, and more recently through limited engagement on PC120. The level of development currently present on the zones has been considered, as has the currently operative AUP zoning. It has been found through the assessment that it is not possible to describe a typical site or an appropriate development response in advance of a design proposal. This is due to the variability of the values the site of cultural significance holds, the tikanga of the mana whenua groups with an interest, and how a development proposal responds to these matters. There is, however, broad agreement in tikanga that enabling more intensive development upon scheduled urupā sites is likely to result in significant adverse cultural effects.
Evaluate options – costs for housing capacity	Identifying the SSMW as a qualifying matter is a negligible cost to housing supply and capacity. Two developed residential sites are proposed to be retained at their currently operative Residential - Single House Zone. While the overlay regulates new buildings, building additions and subdivision as a Discretionary Activity, this does not necessary preclude more intensive development on scheduled sites should the design respond to the matters of concern to mana whenua.
Evaluate option(s) - environmental, social, economic, cultural benefits and costs	Being scarce and irreplaceable cultural resources, the protection of sites and places of significance provides a high cultural and social benefit to mana whenua and Māori more generally (mataawaka).
Selected method / approach	The recommended response is to retain the operative Residential - Single House zoning on two residential sites which are outside of Policy 3 and corridor intensification areas. This ensures that the development expectation arising indicated by the zoning meets the level of development considered culturally appropriate for these scheduled urupā sites.

Overall judgement as to the better option (taking into account risks of acting or not acting)	The impact of the qualifying matter on the level of development enabled by Policy 3 is minimal. The qualifying matter contributes to a well-functioning urban environment as it provides for social and cultural wellbeing through diversity and has a limited impact on the intensification sought under Policy 3 of the NPS-UD. The protection of these sites and places from culturally inappropriate development and subdivision is of high cultural benefit and consistent with the principles of the Treaty of Waitangi.
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3. Issues

20. The qualifying matter being evaluated is the SSMW which manages the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga under section 6(e) of the RMA. It applies under section 77I(a) of the RMA, in accordance with Schedule 3C cls.8(1)(a), and was operative in the AUP when the Auckland Housing Instrument was notified:

77I(a) – the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga is a matter of national importance that decision makers are required to recognise and provide for under section 6 of the RMA.

21. The qualifying matter applies to residential and non-residential zones and seeks to manage development so as to recognise and protect mana whenua's relationships with their culturally significant sites. The application of this qualifying matter does not set absolute development parameters but provides the opportunity for mana whenua groups to assess the impact of proposed development on their culturally significant sites.

4. AUP approach to managing qualifying matter

22. There are currently 107 scheduled SSMW in Schedule 12 of the AUP and nine Māori Heritage Sites identified in Appendices 1f and 2f of the Auckland Council District Plan – Hauraki Gulf Islands Section (**HGI**). They are also identified in the respective planning maps.

23. The sites and places identify, recognise and protect the tangible and intangible values the mana whenua of Tāmaki Makaurau have for these sites and places and provides for this ongoing relationship. The sites meet some or all of the factors identified in Section B6.5.2(2) of the RPS.

24. Each site and place holds its own set of specific values based on its local history and the mātauranga held by associated iwi and hapū. In many cases, tribal associations with these sites overlap in recognition of whakapapa, shared histories and layers of occupation and use over time.

25. The sites scheduled in the AUP have historically contained and continue to contain a range of culturally significant activities. These include pā (forts), kāinga (villages), wāhi tapu (sacred

sites) and urupā (burial areas). Descriptions are listed for some but not all of the sites in Schedule 12 of the AUP.

26. As the cultural values held by these sites vary according to the nature and history of the site, so too does the effect a proposed activity may have on individual sites.
27. A site-by-site assessment in accordance with tribal mātauranga and tikanga² is therefore required when considering the effect of intensification on these scheduled places.
28. The intensification only applies to AUP sites. As no intensification is proposed by the council for Waiheke Island or any of the outer islands, the nine sites in the HGI are not included. For this reason, the sites in the HGI are not discussed further in this report.
29. The SSMW is contained in Chapter D21 and Schedule 12 of the AUP. Chapter D21 contains objectives, policies, activity statuses, standards, matters of discretion and assessment criteria. There are also corresponding standards and rules in other sections of the AUP, most notably the Land Disturbance and Infrastructure chapters. This qualifying matter applies to both residential zones and non-residential zones within the urban environment.
30. Specifically with respect to development, the overlay applies a Discretionary Activity status on the development of new buildings and structures, on alteration and additions to existing buildings where the building footprint is increased³, and on subdivision. The presence of the overlay triggers engagement with mana whenua groups on development proposals.
31. This approach in the AUP was extensively addressed through the Proposed AUP hearings process from 2014 to 2016.

Objectives and Policies (existing)

32. At the Regional Policy Statement level, Chapter B6 Mana Whenua sets out the issues of significance to Māori and to iwi authorities in Tāmaki Makaurau.
33. While many of these issues are relevant to SSMW, the protection of mana whenua culture, landscapes and historic heritage is particularly relevant. The AUP acknowledges that due to a variety of reasons, very little mana whenua cultural heritage has been scheduled in Tāmaki Makaurau, despite the large number of Mana Whenua Groups with strong associations to Auckland⁴.
34. Section B6.5 Protection of Mana Whenua cultural heritage lists the objectives and policies most relevant to SSMW.
35. Objective 1 identifies that both tangible and intangible values are to be identified, protected and enhanced. Objectives 2 and 3 provide for the relationship of Mana Whenua with their

² Correct procedure or custom

³ Chapter D21, Activity Table D21.4.1(A5) and (A6).

⁴ RPS B6.6 Explanation and Reasons for Adoption

cultural heritage and seek to ensure the association of Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced.

36. Policies 1 to 3 of B6.5.2 provide directions to identify, evaluate and protect cultural and historic heritage sites and areas which are significant to Mana Whenua through their incorporation into Schedule 12 of the AUP.

37. Policy 4 states:

Protect the places and areas listed in Schedule 12 Sites and Places of Significance to Mana Whenua Schedule from adverse effects of subdivision, use and development by avoiding all of the following:

- (a) the destruction in whole or in part of the site or place and its extent;*
- (b) adverse cumulative effects on the site or place;*
- (c) adverse effects on the location and context of the site or place; and*
- (d) **significant adverse effects on the values and associations Mana Whenua have with the site or place** (emphasis added);*

taking into account in such circumstances whether or not any structures, buildings or infrastructure are present and the adverse effects are temporary.

38. The avoidance of **significant** adverse effects in Policy 4 contrasts with a less stringent policy directive for adverse effects to 'avoid where practicable' in Policy 5⁵.

39. The directive policy of Policy B6.5(4)(d) to avoid significant adverse effects on the values and associations Mana Whenua have with a site or plan cascades to the overlay provisions located in Section D21 Sites and Places of Significance to Mana Whenua Overlay.

40. Policy D21.3 (2) goes on to state: 'avoid significant adverse effects on the values and associations of Mana Whenua with sites and places of significance to them'.

5. Development of Options

41. 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

⁵ Policy B6.5.2.(5)(a) 'avoiding where practicable, or otherwise remedying or mitigating adverse effects on the values and associations of Mana Whenua with the site, place or area'

Frequent Transit corridors and modifying zoning in suburban areas through an amended pattern of Residential - Mixed Housing Urban and Mixed Housing Suburban zones;

- enabling the building heights and densities specified in clause 4(1)(b) and (c) of Schedule 3C of the RMA within at least the walkable catchments of Maungawhau (Mount 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.

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

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

- **Option 1:** Apply Schedule 3C cls.4(1)(b) or (c) and Policy 3 and the SSMW as it is currently operative across the region,
- **Option 2:** Apply Schedule 3C cls.4(1)(b) or (c) and Policy 3 and do not apply the SSMW as a qualifying matter,
- **Option 3:** Apply Schedule 3C cls.4(1)(b) or (c) and Policy 3 in a modified form by identifying alternative density standards for scheduled sites of significance,
- **Option 4:** Apply the SSMW as it is currently operative across the region and apply the currently operative zone provisions to two scheduled urupā sites which would otherwise be subject to intensification. (**Recommended option**).

Consequences for development capacity

44. The alternative density standards associated with the recommended option (Option 4), to maintain a status quo single house level of development, would only apply to two residential properties (the retention of their operative zoning). While this may have some effect on the landowners themselves in terms of lost development opportunity, at a local or regional scale the impact on the level of development otherwise enabled by the NPS-UD would be minimal.

Evaluation of options

45. To determine the most appropriate response for SSMW as an existing 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.

Table 2: Evaluation of Options

Sites and Places of Significance to Mana Whenua	Option 1: Apply SSMW as it is currently operative across the region	Option 2: Apply Policy 3 and do not apply the SSMW as a qualifying matter	Option 3: Apply Policy 3 in a modified form by identifying alternative density standards for scheduled sites of significance.	Option 4: Apply SSMW as it is currently operative across the region and apply the currently operative zone provisions to two scheduled urupā sites which would otherwise be subject to intensification. (Recommended option)
Costs				
Costs of applying QM – housing supply / capacity	Negligible cost: The limited number of sites involved will have negligible impact on housing capacity and supply.	No cost: The SSMW overlay would not be applied, resulting in no potential restriction on development.	Negligible cost: The limited number of sites involved will have negligible impact on housing capacity and supply.	Negligible cost: The limited number of sites involved will have negligible impact on housing capacity and supply.
Costs: Social, cultural, environmental.	Low cost: The overlay provides for mana whenua to be consulted on development proposals on their sites of cultural significance. This is likely to result in better cultural outcomes than Option 1.	High cost: In applying Policy 3 without any consideration of sites of cultural significance to mana whenua, a level of intensification will be enabled on culturally sensitive sites which may diminish or permanently compromise the cultural values the sites hold. Only a fraction of culturally significant sites are identified and protected in	Low cost: The limited number of sites involved makes this a low-cost option when considered broadly across society.	Low cost: The limited number of sites involved makes this a low-cost option when considered broadly across society.

Sites and Places of Significance to Mana Whenua	Option 1: Apply SSMW as it is currently operative across the region	Option 2: Apply Policy 3 and do not apply the SSMW as a qualifying matter	Option 3: Apply Policy 3 in a modified form by identifying alternative density standards for scheduled sites of significance.	Option 4: Apply SSMW as it is currently operative across the region and apply the currently operative zone provisions to two scheduled urupā sites which would otherwise be subject to intensification. (Recommended option)
		the AUP, and they are an irreplaceable cultural resource. The cost of the loss of cultural heritage and rangatiratanga ⁶ will be significant to mana whenua groups.		
Costs: Economic (not otherwise covered by housing capacity issues)	Low cost: The limited number of sites involved makes this a low-cost option when considered broadly across society. At an individual landowner level, some cost will be incurred as a resource consenting process would be required to achieve full intensification.	No cost.	Low cost: The limited number of sites involved makes this a low-cost option when considered broadly across society. At an individual landowner level, some cost will be incurred as a resource consenting process would be required to achieve full intensification. Due to the variability of the values which the sites represent, the blanket	Low cost: The limited number of sites involved makes this a low-cost option when considered broadly across society. At an individual landowner level, some cost will be incurred as a resource consenting process would be required to achieve full intensification. Maintaining the currently operative zoning on two scheduled urupā sites that

⁶ Right to exercise authority

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			application of alternative density standards is not considered to be efficient nor necessary and would impose unnecessary economic costs on landowners.	would be otherwise by subject to intensification may result in some lost opportunity costs for two landowners.
Benefits				
Benefits of applying the QM - broader social, economic, environmental, cultural	High benefit: The protection of these scarce cultural resources provides an ability for mana whenua groups to maintain their cultural relationships with their taonga. As society becomes more aware of the cultural importance of these sites, their protection will similar yield benefits across society more broadly.	Low benefit: By not applying the overlay as a qualifying matter, there will be a financial benefit to some landowners through not being required to undergo resource consenting processes for new and further development. Landowners will also have more development certainty for their property.	High benefit: The protection of these scarce cultural resources provides an ability for mana whenua to maintain their cultural relationships with their taonga. As society becomes more aware of the cultural importance of these sites, their protection will similar yield benefits across society more broadly.	High benefit: The protection of these scarce cultural resources provides an ability for mana whenua to maintain their cultural relationships with their taonga. As society becomes more aware of the cultural importance of these sites, their protection will similar yield benefits across society more broadly. There is a planning benefit in aligning what is considered a

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				culturally appropriate level of development on scheduled urupā sites with the zoning expectations. This will be beneficial during resource consenting processes and is a publicly visible indication of the development potential of the sites for current and future landowners.

6. Analysis

46. The evaluation table in Attachment 2 identifies that of the 60 scheduled sites potentially subject to intensification in the urban environment, six are located within walkable catchments, one is adjacent to a Frequent Transport Network corridor and none are in areas considered appropriate for further intensification under Policy 3(d) of the NPS-UD.
47. For completion, the table also identifies sites within the city centre (greyed out as not part of PC120) and also on or adjacent to residential zones which are not proposed to be intensified due to their predominantly low resident population. These are sites 038, 039, 040, 041 in Kawakawa Bay.
48. During council's engagement with mana whenua representatives on PC78, the following themes were identified to assess the threat to the scheduled sites from intensification under the NPS-UD:
- a. added risk of flooding onto scheduled sites,
 - b. effects on scheduled significant vegetation present on sites or adjacent to them,
 - c. added risk of discharges onto sites resulting from a lack of infrastructure capacity or an inability to undertake on site mitigation,
 - d. the relationship that sites had with natural features and the wider cultural landscape,
 - e. the risk to coastal sites arising from climate change and erosion,
 - f. a need to maintain access to sites of significance, and
 - g. cultural sensitivity with respect to urupā.
49. A desktop analysis was undertaken by council's planning and Māori heritage staff for PC78. This has since been updated by the planning team to reflect any changes to the proposed locations of intensification in PC120, which is now concentrated in centres, along transport corridors and in some residential areas outside of these locations. This analysis is included as Attachment 2.
50. As is outlined in the council's overview section 32 report and the individual qualifying matter reports, matters pertaining to flooding, significant ecological areas, climate change and coastal erosion and access (via retaining public open space) are all either existing or proposed qualifying matters.
51. The development of the controls responding to these qualifying matters has been underpinned by an approach that future intensification will create no further adverse effects with respect to these matters beyond those which the plan currently anticipates.
52. The various controls provide the scope and policy direction to avoid, remedy or mitigate these matters through resource consent and plan change processes. This analysis therefore assumes the scheduled sites of significance will be unaffected by these matters to a degree greater than currently occurs (if at all) under the currently operative AUP.

53. The blocking of culturally significant views and relationships have been considered and discussions with respect to individual sites were held with Mana Whenua representatives during the development of PC78. The conclusions reached have not changed in response to this latest intensification proposal.
54. The views/relationships identified have been found to either be not subject to intensification or remain addressed in the plan through a precinct, special character overlay, viewshaft protection, or height sensitive area protections. The council position is that these protections will be maintained.
55. Of note, cultural landscapes are not currently provided for in the AUP as a control mechanism outside of individual precincts such as the Puhinui Precinct⁷.
56. The current zoning has been considered. Where the site is currently open space, the council position is that no intensification will be enabled.
57. For those sites which already contain transport infrastructure or are already developed and within the city centre⁸, metropolitan zones and business zones within the walkable catchments, intensification is not opposed. This is on the basis that the existing provisions of the overlay provide full discretion to consider the nature and scale of future development and subdivision.
58. Currently all of these sites, with the exception of Site 009 - Nga Wharo a Tako on Federal Street, are annotated in Schedule 12 that a site exception rule applies. This annotation recognises that while the sites contain intangible values associated with historic events, occupation and cultural activities, they do not still contain archaeology due to their highly urbanised state.
59. Section 35 monitoring of the operative AUP provisions is being undertaken to determine the efficiency and effectiveness of the existing AUP provisions in managing development and subdivision on scheduled SSMW.
60. The research has analysed 115 resource consent applications and decisions that intersected with the SSMW. 59 had activities occurring within the SSMW extent and 47 triggered resource consent. The date range was from December 2016 to August 2023.
61. In all but 15 cases mana whenua groups were contacted to provide their views on the proposal. In the instances where contact was not made, this was due to the existence of consent orders, because the activities were permitted under the overlay, or because the application was amended so as to comply with the requirements of the overlay.
62. Overall, the analysis has found evidence of mana whenua being consulted in almost every instance and no instances where consent had been granted against the express cultural recommendations of the mana whenua groups. Evidence of cultural conditions being applied

⁷ Chapter I – South Precincts I432

⁸ Noting that the City Centre Zone and Metropolitan Centres (apart from Westgate and New Lynn) are outside the scope of this plan change and has been addressed in Plan Change 78.

in granted consents was also found. The overlay therefore provides a strong level of control over land use and development.

63. While a significant portion of the scheduled sites are either unaffected by the intensification, or sufficiently provided for by the existing overlay provisions, scheduled urupā by virtue of their cultural significance and the tangible and intangible values they contain are particularly vulnerable to significant adverse cultural effects from inappropriate development.

Residential sites

64. The situation where urban development is to be enabled on scheduled urupā exists on three residential sites in the AUP. These sites are highlighted in Attachment 1, Attachment 2 and set out in Table 3.
65. The rezoning of Sites 057 and 058 from their current zoning of Residential - Single House Zone to a higher density zoning would set a higher development expectation than would be culturally appropriate on these sites.
66. While the provisions of the overlay would still apply, applying a higher intensity zoning on these two ancestral urupā sites creates an inappropriate tension between the expectations of the overlay and development potential indicated by the zone. Accordingly, there is a need to retain Sites 057 and 058 as Residential – Single House Zone. The recommended zoning approach is set out in Attachment 1.
67. The third residentially zoned site which is potentially subject to intensification is Site 026. Site 026 is the Mangere Piriti Urupā in the St James Anglican Churchyard. Engagement with mana whenua representatives and submissions on PC78 stated that residential intensification of this site was of significant cultural concern.
68. While the Mangere Piriti Urupā is particularly sensitive to intensification, discussions with church representatives and research undertaken by the council's Māori Housing Team have identified that site-specific circumstances exist which mitigate the potential for a more permissive zoning to result in inappropriate development on this cultural site.
69. The St James Anglican Church contains sanctified land in the form of both Māori and European cemeteries. The scheduled site is also classified as Māori Land under Te Ture Whenua Māori Land Act 1993 and is managed by a Trust appointed by the Māori Land Court.
70. In the unlikely event of the church relocation, there are strict processes around the de-consecration and relocation of both European cemeteries and Māori urupā. This process is guided by the Anglican Bishop and mana whenua representatives.
71. The fact that this is an operational church makes it unlikely that intensification will occur on this site in the medium to long term. In addition, there are appropriate 'checks and balances' in the form of church and Māori Land trust processes that would ensure that mana whenua interests are able to be considered. Finally, the overlay is proposed to remain over the site,

thereby triggering engagement with those mana whenua groups with an interest in the site should intensification be proposed.

72. Therefore a zoning response in addition to the retention of the SSMW on Site 026, as set out in Attachment 1 is not preferred.

73. Table 2 summarises the urupā scheduled in the region, their current (operative) zoning and the existing development on these sites⁹.

Table 3: Summary of scheduled urupā in the AUP

Schedule ID and Name	Zone	Development
022 Urupā	Open Space Zone	Vacant open space
023 Urupā	Open Space Zone	Vacant open space
024 Urupā	Open Space Zone	Vacant open space
026 Urupā	Mixed Housing Suburban Zone	Church and cemetery 4% building coverage
027 Urupā	Māori Purpose Zone	Urupā and shed
028 Urupā	Māori Purpose Zone	Urupā
038 Urupā	Single House Zone	Vacant with corner portion of driveway
039 Urupā	Single House Zone	Vacant
040 Urupā	Single House Zone	Vacant with some dwelling encroachment
041 Urupā	Rural Coastal Zone	Vacant
042 Urupā	Rural Coastal Zone	Urupā
043 Urupā	Rural Coastal Zone	Large site with barn and house on one portion.
057 Urupā	Single House Zone	Hall building – 47% building coverage
058 Urupā	Single House Zone	Dwelling and accessory buildings – 21% building coverage
063 Urupā	Open Space Zone	Vacant
064 Ō Peretu	Open Space Zone	Barracks and associated structures (NZ Defence Force)
066 Urupā Fraser Road	Mixed Use Zone and Light Industry Zone	Carpark, road, footpath
067 Karaka Taupo	Road Reserve	Road reserve
068 Karaka Taupo	Rural Production Zone	Vacant
069 Urupā at Karaka Taupo on foreshore	Road/Coastal Marine Area	Vacant
070 Urupā at Karaka Taupo, Kawakawa Bay	Road/Open Space Zone	Vacant
103 Motururu Urupā Omaha	Rural Coastal Zone	Urupā
22 Sites	None in Policy 3 areas	

⁹ Development has been assessed via a desktop exercise. Site visits have not been made to these sites.

Business site

74. A fourth site urupā site is listed as Site 066. It is in a Business - Mixed Use Zone (214m²), Business – Light Industrial Zone (5m²) and Road. This site is fully developed as a road, carpark and footpath.
75. While the carpark at 7 Fraser Road, Mount Wellington has a height variation control enabling height up to 50m, significant further intensification of the carpark is suppressed by other existing qualifying matters (volcanic viewshafts). The portion which is scheduled urupā on this site is a small, narrow portion 7m in width at the northeast road boundary. The road and footpath are not affected by the requirements of the NPS-UD.
76. On that basis, reliance on the provisions of the SSMW is recommended as the most efficient and effective response as no inappropriate tension between the expectations of the overlay and the underlying business zone is likely. No zoning response is recommended as is stated in Attachment 1.

Risks or acting or not acting

77. 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.
78. The SSMW are existing sites which have been scheduled in the AUP through a process under schedule 1 of the RMA. The information, location and extents of these places are considered certain and sufficient for their assessment as a qualifying matter under section 6(e) of the RMA.

Effectiveness and efficiency

79. The respective costs and benefits of the four options have been discussed in Table 2 and an assessment of the relative efficiency and effectiveness has been undertaken from paragraph 64 above.
80. The overall effect of applying this qualifying matter on development capacity is minimal due to the limited number of sites it applies to. The overlay is the most effective and efficient response in most cases and may not necessarily result in lower density development.
81. In cases where applying a more intensive zone may create an inappropriate planning tension between the expectations of the zone and the overlay, it is recommended that the most efficient and effective approach is to retain the low-density operative zoning to complement the overlay. This is on two residential sites.

7. Overall conclusion

82. The Sites and Places of Significance to Mana Whenua Overlay is the primary mechanism within the AUP for recognising and protecting Māori cultural heritage within Tāmaki Makaurau.
83. It provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga, thereby responding directly to section 6(e) of

the RMA. Under section 77I(a) and 77O(a) of the RMA, the Sites and Places of Significance to Mana Whenua Overlay is a qualifying matter.

84. Currently the overlay protects a small proportion of Māori cultural heritage within the region. Each site is culturally unique making them a scarce resource. The overlay should be retained as a qualifying matter.
85. The application of this qualifying matter will have a negligible effect on the provision of housing capacity and supply but will allow people and communities to provide for their social and cultural wellbeing.
86. It is not possible to categorically determine how the application of the overlay may affect the intensification on individual sites in the absence of a specific development proposal. On two residential sites, where a more intensive zone will set up an inappropriate tension with the expectations of the overlay, the lower density operative Residential – Single House Zone should be retained.

Attachments

Attachment 1: Policy 3, Frequent Transport Network Corridor Intensification Areas.
Recommended Zoning Responses (scheduled urupā)

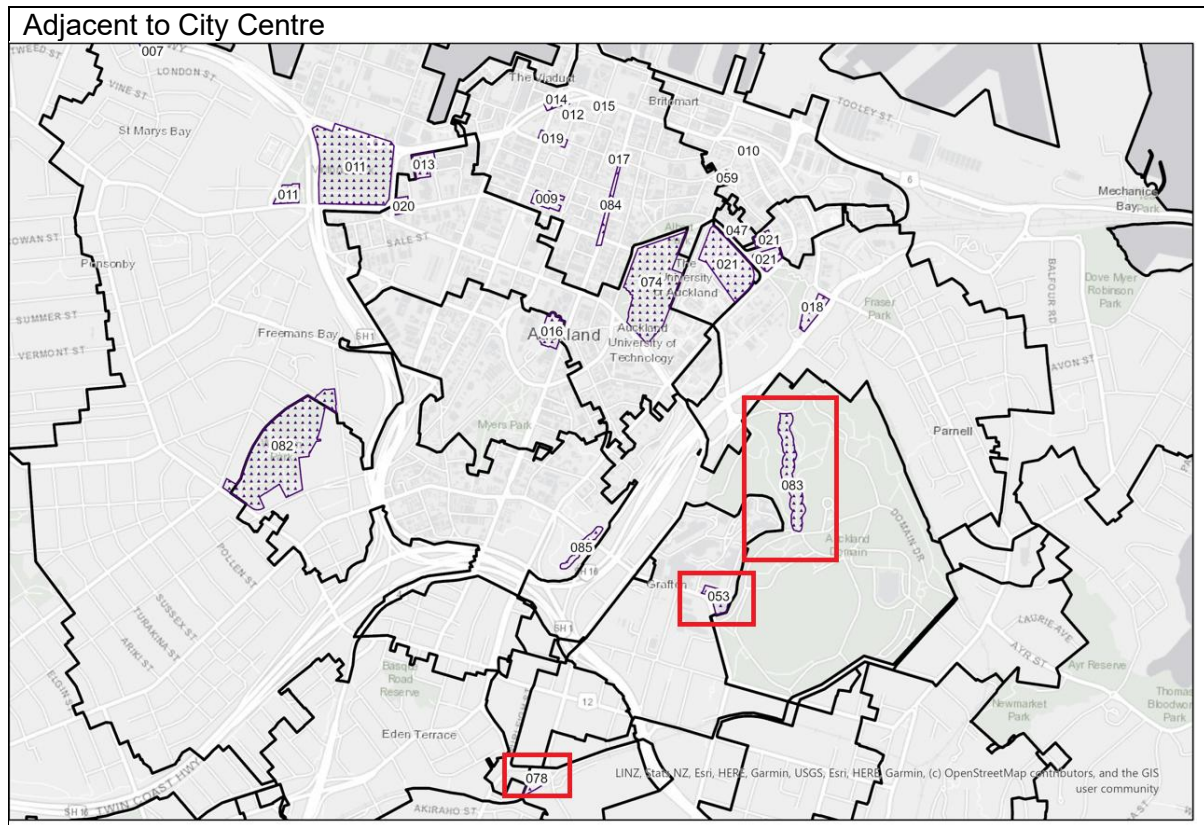
Attachment 2: SSMW Threat Evaluation

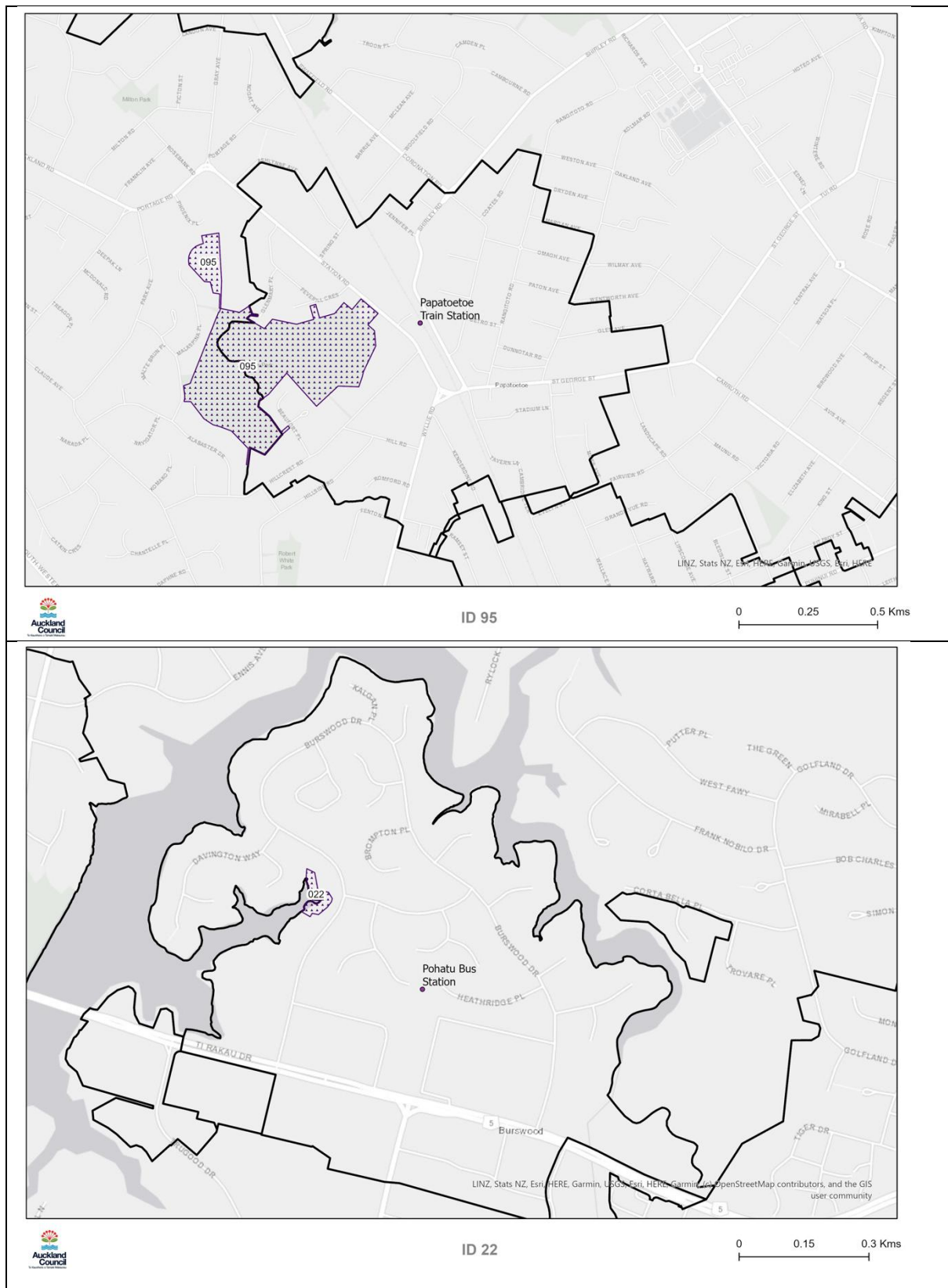
Consultation summary

1. The First Schedule to the RMA sets out the relevant consultation requirements.
2. In addition to the mana whenua consultation listed in paragraph 17 above, 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.

Attachment 1: Policy 3, Frequent Transport Network Corridor Intensification Areas Recommended Zoning Responses (scheduled urupā)

SSMW in Policy 3 Walkable Catchments



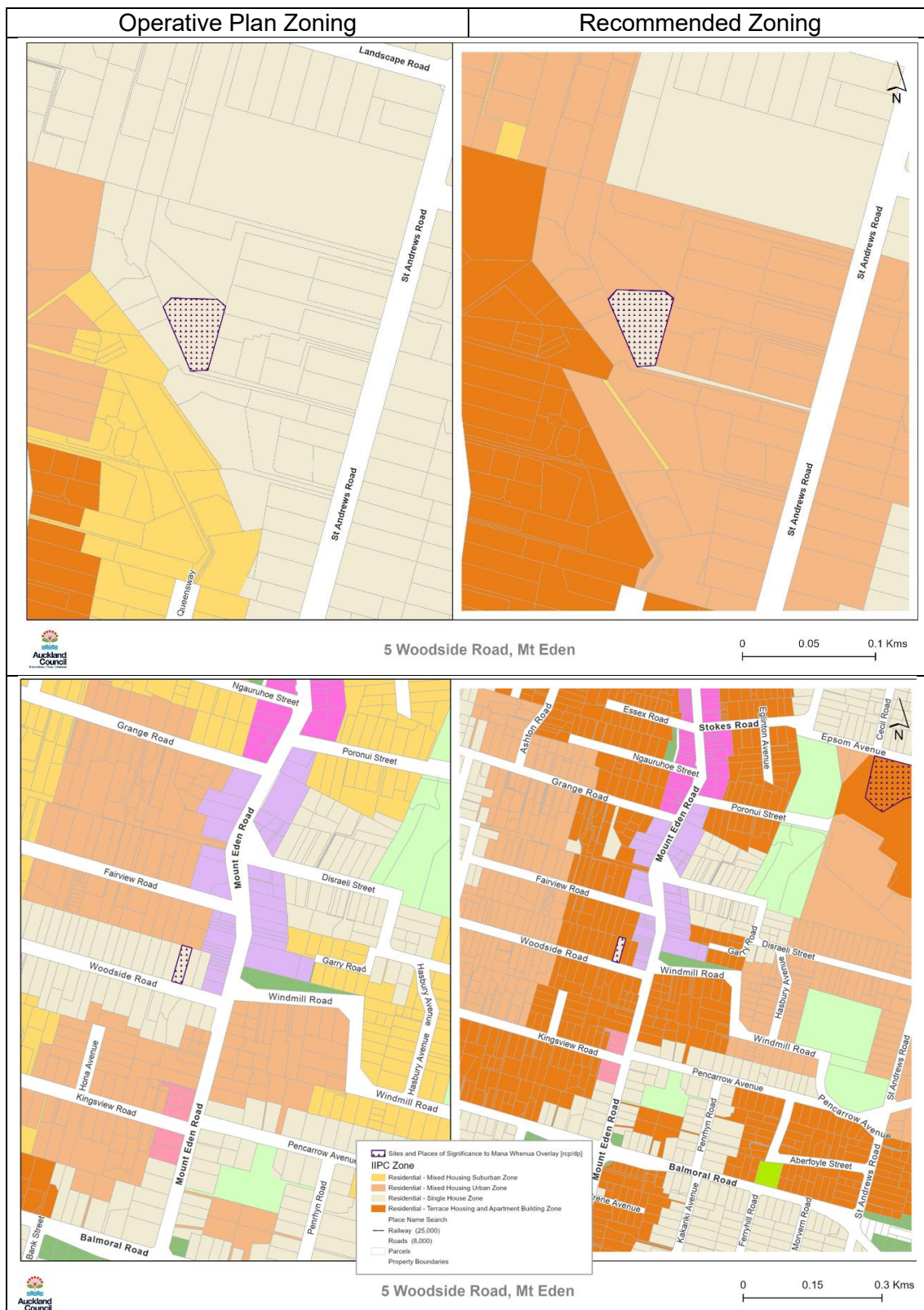


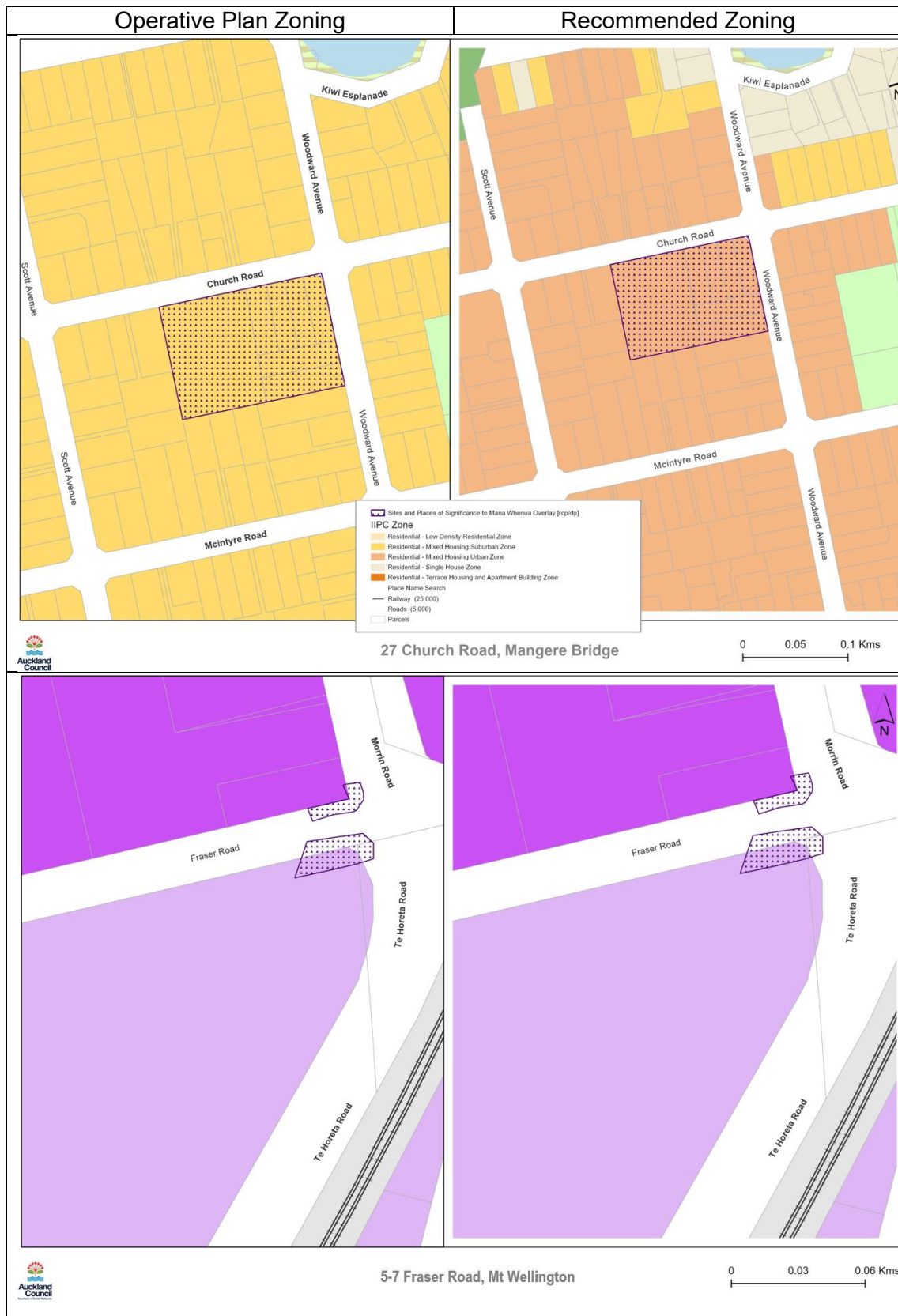


SSMW in Frequent Transport Network Corridor Intensification



Recommended SSMW Zoning Responses (Scheduled Urupā)





Attachment 2: Scheduled Sites of Significance Threat Assessment

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
001-Tukituki Muka (Webber Street)	Retain open space zoning	Open space	No	N/A	No	No	No	None	Access will be retained
002 - Te Tokaroa headland and Te Ara Whakapekapeka a Ruarangi	Retain open space zoning	Open space/ Coastal Transition	No	N/A	N/A	No	No	Yes. Support low density zoning to mitigate against coastal erosion hazard.	Access will be retained
003- Rangimatarau (Point Chevalier)	Support Downzoning to Single House Zoning proposed for coastal erosion Natural Hazards	Open Space and MHS	No	None identified	No	None identified	Unlikely	Steep cliff. Support low density zoning to mitigate against coastal erosion hazard.	Access on Open Space retained
004- Nga Kauaewhati	No increased risk from intensification	Major Recreation Facility	No	No	No	No	No	No	Access unchanged
005- One-Maru (Shelly Beach Road/Northern Motorway)	No increased risk as already developed. Intensify.	THAB and Road	No	N/A	N/A	N/A	N/A	N/A	N/A
006 – Te Koroaenga (Point Erin Park)	No increased risk. Retain as open space.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
007 – Ko Takerehaea (St Marys Road)	Retain open space zoning.	Open Space	No	None Identified	None identified	Adjacent to steep sections	Unlikely	Adjacent to steep sections	Access will be retained
008 – Wai Orea	Retain water and open space zoning	Water and open space	No	No	None identified	None identified	N/A	N/A	Access will be retained
009 – Nga Wharo a Tako (Federal Street)	No increased risk as already developed. Intensify.	City Centre Zone		N/A	N/A	N/A	N/A	N/A	N/A
010* – Te Horo Roa (Beach Road)	No increased risk as already developed. Intensify.	Road		N/A	N/A	N/A	N/A	N/A	N/A
011*- Wai Kōkota/Te Tō (Victoria Park)	Retain open space zoning.	Open Space		N/A	N/A	N/A	N/A	N/A	N/A
012*- Pare Tuhu (Federal Street)	No increased risk. Already developed. Intensify.	Road		N/A	N/A	N/A	N/A	N/A	N/A
013* – Te Paneiriiri	No increased risk. Already developed. Intensify.	City Centre Zone and Road		N/A	N/A	N/A	N/A	N/A	N/A

Greyed out sites are within the City Centre – not part of PC120

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
(Fanshawe Street)									
014* – Te Hika a Rama (Fanshawe Street)	No increased risk. Already developed. Intensify.	Road		N/A	N/A	N/A	N/A	N/A	N/A
015*- Ngahu Wera (Albert Street)	No increased risk. Already developed. Intensify.	Road		N/A	N/A	N/A	N/A	N/A	N/A
016*- Horotiu (Queen Street)	No increased risk. Already developed. Intensify.	City Centre Zone and Open Space		N/A	N/A	N/A	N/A	N/A	N/A
017*- Te Whatu (Shortland Street)	No increased risk. Already developed. Intensify.	Road		N/A	N/A	N/A	N/A	N/A	N/A
018* – Te Toangaroa (Stanley Street)	No increased risk. Already zoned city centre and developed. Intensify.	City Centre Zone		N/A	N/A	N/A	N/A	N/A	N/A
019* – Te Tara Karaehe (Swanson Street)	No increased risk. Already zoned city centre and developed. Intensify.	City Centre Zone and Road		N/A	N/A	N/A	N/A	N/A	N/A
020* – Te Koranga (Victoria Street West)	No increased risk. Already zoned city centre and developed. Intensify.	City Centre Zone and Road		N/A	N/A	N/A	N/A	N/A	N/A
021* – Te Reuroa Pa (Old Government House, University of Auckland)	No increased risk. Retain open space. Intensify city centre portion.	City Centre and Open Space		N/A	N/A	N/A	N/A	N/A	N/A
022-Urupā (Burswood Drive)	Retain open space zoning	Open space	Yes	None identified	None identified	None identified	Unlikely	None identified	Access will be retained
023 – Urupā (Blackburn Rd)	Retain open space zoning	Open space	Yes	N/A	N/A	None identified (Heavy Industry adjacent)	No	N/A	Access will be retained
024-Urupā (Ti Rakau Drive)	Retain open space zoning	Open space	Yes	None identified	N/A	None identified	None identified	None identified	Access will be retained
025- Te Naupata (Musick Point)	Retain open space zoning	Open Space	No	None identified	N/A	None identified	None identified	None identified	Access will be retained

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
026- Urupā	No increased risk in upzoning to MHU due to site specific circumstances. St James Anglican Church and Māori Land	MHS	Yes	None identified	None identified	None identified	None identified	None identified	No change in Access – church grounds
029 - Otutaua/Puke Taapapa (Pukeiti)	No increased risk. Retain open space zoning.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
030 – Mangere Maunga	Retain zoning. Retain open space zoning.	Open Space	No	None identified	None identified	None identified	Viewshafts to be retained	None identified	Access will be retained
031 – Ambury Park Stonefields	No increased risk. Retain open space zoning.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
038-Urupa (Kawakawa Bay)	Current zoning to be retained - outside NPS-UD intensification (Settlement under 5000)	SH	Yes	N/A	N/A	N/A	N/A	N/A	N/A
039- Urupa (Kawakawa Bay)	Current zoning to be retained - outside NPS-UD intensification (Settlement under 5000)	SH	Yes	N/A	N/A	N/A	N/A	N/A	N/A
040- Urupa (Kawakawa Bay)	Current zoning to be retained - outside NPS-UD intensification (Settlement under 5000)	SH	Yes	N/A	N/A	N/A	N/A	N/A	N/A
041 Urupa (Clevedon-Kawakawa Road)	Current zoning to be retained - outside NPS-UD intensification (Settlement under 5000)	Rural	Yes	N/A	N/A	N/A	N/A	N/A	N/A
047- Wai Ariki (Waterloo Quadrant)	No increased risk. Already City Centre Zone. Intensify	City Centre Zone	No	N/A	N/A	N/A	N/A	N/A	N/A
053 – Tokiwhatinui	No increased risk. Special purpose hospital zone	Special Purpose Hospital Zone	No	N/A	N/A	N/A	N/A	N/A	N/A

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
(Auckland Hospital)	unlikely to be affected. Retain zoning. In walkable catchment								
054- Ōpoutūheka (Cox's Bay reserve)	Retain open space zoning	Open Space	No	None identified	None identified	None identified	None identified	None identified	Access will be retained
057- Urupā (Woodside Road)	Sensitive site – Located in FTN Corridor - Retain existing zone rather than upzone to THAB.	SHZ	Yes	None identified	N/A	None identified	None identified	None identified	Private land -no change in access
058 - Urupā	Sensitive site – Retain existing zone rather than upzone to MHS.	SHZ	Yes	N/A	N/A	N/A	N/A	N/A	Private land – no change in access
059 -Waahi Whakahirihira (Emily Place)	No increased risk. Retain open space zoning.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
060 – Te Ana a Rangimarie (St Andrews Road)	No increased risk. Retain open space zoning.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
061 – Waitaramoa (Portland Road)	Retain open space zoning	Open Space	No	Not exacerbated by development	None identified	Yes – currently remedial work being undertaken	None identified	None identified	Access will be retained
062 – Te Rōutu o Ureia (Curran Street On-Ramp)	No increased risk. Already developed as infrastructure. Intensify.	Road and CMA	No	N/A	N/A	N/A	N/A	N/A	N/A
065-Te Pane o Horoiwi (Riddel Road)	Road and Coastal Marine Area not subject to intensification.	Road and CMA	No	N/A	N/A	N/A	N/A	N/A	N/A
066 – Urupā (Morrin Road)	Site already developed with carpark, road, footpath. Configuration and zoning make intensification over the scheduled urupā site unlikely.	Mixed Use Zone (partially within walkable catchment)	Yes	N/A	N/A	N/A	N/A	N/A	N/A

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
	Other QM apply – Volcanic Viewshaft to suppress height. No response recommended								
073 – Karaka Bay Foreshore - Te Tiriti Signing, sites of Battles	Road and Coastal Marine Area not subject to intensification.	Road and CMA	No	N/A	N/A	N/A	N/A	N/A	N/A
074 – Part of Extent of Te Reuroa Pa (Albert Park)	No increased risk. Retain as open space zone.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
075 – Waatarua Reserve	If intensification affects SEA on site of significance, then this is culturally problematic. Retain open space zoning.	Open Space	No	Wetland	None identified	None identified	None identified	None identified	Access will be retained
077- Onepū Whakatakataka	Retain open space zoning.	Open Space	No	Check properties on high ground to east	None identified	None identified	Unlikely	None identified	Access will be retained
078* – Te Ipu Pakore (Enfield Street)	No increased risk. Intensify. In walkable catchment	Mixed Use Zone	No	N/A	N/A	N/A	N/A	N/A	N/A
079 – Te Rehu (Meola Road)	If intensification affects SEA on site of significance, then this is culturally problematic. Retain open space zoning	Open Space	No	Existing flooding but not exacerbated by intensification	None identified	None identified	Unlikely	None identified	Access will be retained
082 – Tuna Mau	Affects on water quality through park would be a potential issue.	Open Space	No	N/A	N/A	Unlikely	N/A	N/A	N/A

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
	Retain as open space								
083- Te Ako o Te Tui (In Auckland Domain)	No increased risk. Retain open space zoning. In walkable catchment	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
084* – Horotiu Stream (Queen Street)	No increased risk. Already developed as infrastructure. Intensify.	Road	No	N/A	N/A	N/A	N/A	N/A	N/A
085 – Waiparuru (Grafton gully)	No increased risk. Retain open space and intensify infrastructure.	Open Space and Road	No	N/A	N/A	N/A	N/A	N/A	N/A
088- Te Pokanoo a Tarahape (Paratai Drive)	No increased risk. Retain open space zoning.	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A
089 -Takāraro (Mt Cumbria Devonport)	Retain open space zoning	Open Space	No	None identified	None identified	None identified	Possible reduction in view between this site and Mt Vic (Takarunga) although not to the tihi or top portions of Takarunga maunga. Special Character overlay is suppressing height to the west of SSMW.	None identified	Access will be retained
095- Kohuora (Kohuora Park, Papatoetoe)	Retain open space zoning	Open Space	No	Elevated site	Check for effects on SEA – Western side	Check with experts	Unlikely	None identified	Access will be retained
096 – Te Tapuwae o Mataaoho (Sturges park + adjacent)	The SSMW overlay allows discretion to consider buildings/additions. MHS already so smaller step to MHU. Limited risk from intensification. Intensify.	Open Space and MHS	No	None identified	ONF position is to retain overlay to control development	None identified	Unlikely	None identified	Access will be retained
097 -Te Taurere (Mt Taylor reserve)	Retain open space zoning	Open Space	No	Elevated site	ONF	None identified	Unlikely	None identified	Access will be retained

Site # and name	Recommendation	Current Zone (AUP)	Urupā?	Flooding	Effects on SEA – vegetation removal/light spill etc	Discharges	Blocking relationships/views	Climate change/erosion/coastal areas	Access to cultural sites
098 – Mutukaroa (Hamlins Hill)	No increased risk. Retain open space zoning	Open Space	No	N/A	N/A	N/A	N/A	N/A	N/A

60 Scheduled Sites in Total

18 in city centre (greyed out – addressed through PC78)

4 residential zone but outside plan change intensification area (i.e. rural and coastal settlement)

6 in walkable catchments (excluding within City Centre)

1 adjacent to a Frequent Transport Corridor (for intensification)

0 in Policy 3(d) areas