



**November
2025**



Proposed Plan Change 120 Information Sheet #15

Coastal Environment Qualifying Matter

From 3 November to 19 December 2025, Auckland Council invites submissions on Proposed Plan Change 120: Housing Intensification and Resilience (PC120) - a change to the Auckland Unitary Plan (AUP) (our city's planning rulebook) that proposes to rezone areas of residential land for greater intensification, to enable greater building heights and densities in many parts of urban Auckland, and to strengthen management of natural hazard risks.

Submissions are now open until 5pm on Friday 19 December 2025.

This information sheet explains the council's approach to identification and application of the coastal environment qualifying matter.

Background to Proposed Plan Change 120

PC78 was Auckland's former intensification plan change as required by the National Policy Statement on Urban Development 2020 (NPS-UD). It incorporated the Medium Density Residential Standards (MDRS) which was legally required at the time. This generally allowed three dwellings of up to three storeys to be built on most residential sites without resource consent.

In August 2025, the government amended the Resource Management Act 1991 (RMA) which enabled PC78 to be withdrawn. Auckland Council withdrew PC78 (in part) and notified PC120 to improve Auckland's resilience to natural hazards and focus intensification around centres and transport nodes.

PC78 was withdrawn in part from 5pm on 9 October 2025, and included withdrawal of the MDRS in PC78.

PC120 addresses central government requirements to:

- contribute to the same level of housing capacity in the AUP as was to be enabled by PC78

- enable building heights and densities within and around town and local centres which reflect the level of commercial and community activity these centres offer
- enable building heights of at least 6-storeys within walkable catchments from the edge of the city centre zone, the edge of metropolitan centre zones and around existing and planned rapid transit stops (train and busway stations) and
- enable building heights of at least 10- and 15- storeys around certain train stations listed in the RMA.

These heights and densities must be enabled unless a ‘qualifying matter’ applies to a site (see Information Sheet #13) which makes that level of development inappropriate.

PC120 also strengthens provisions that manage natural hazard risks. Areas potentially affected by flooding, land instability, coastal erosion or coastal inundation now and in the future are targeted with stronger rules and other planning measures. This approach is to improve Auckland’s resilience to severe weather events and natural hazards, following the storms in early 2023 which resulted in widespread flooding, landslips, and coastal inundation across the region.

What is the Coastal Environment?

Tāmaki Makaurau's diverse 3,200km coastline features significant environmental, cultural, and social values, but is challenged on both landward and seaward sides from the pressures of development, erosion, flooding, and sea-level rise.

The coastal environment is generally recognised as the area where the land and sea meet, which results in a special set of environments where marine and terrestrial (land) processes influence one another.

The coastal environment is not defined under the RMA and is not mapped in the existing AUP. The extent and characteristics of the coastal environment differs across the region and between localities. Perceptions of the coastal environment also vary among different people and groups. However, Policy 1 of the New Zealand Coastal Policy Statement 2010 (NZCPS) identifies several qualities of the coastal environment that are widely recognised and accepted, including, but not limited to:

- the coastal marine area
- areas where coastal processes, influences or qualities are significant
- areas at risk from coastal hazards
- coastal vegetation and habitats
- elements and features that contribute to natural character, landscape, visual qualities or amenity values
- cultural and/or historic heritage items in the coastal marine area or on the coast, as well as physical resources and built facilities that have modified the environment.

Currently, under AUP Chapter B8. Toitū te taiwhenua - Coastal environment, the coastal environment is identified as including both the coastal marine area and landward areas influenced by coastal processes and features.

The RMA does not define the coastal environment, but it is identified as requiring special, integrated management. This is strengthened by the NZCPS, and the Hauraki Gulf Marine Park Act 2000.¹

The Coastal Environment as a Qualifying Matter

A qualifying matter refers to values of some areas that may allow the council to modify, or reduce, required building heights or density. This is explained in more detail in information sheet #13 Qualifying Matters.

The coastal environment of Tāmaki Makaurau is central to Auckland’s identity and valued for its natural, cultural, and recreational qualities.

The inclusion of the Coastal Environment as a qualifying matter in PC120 is necessary to recognise and protect natural character, landscape, amenity and cultural values from intensification in areas near the coastline that are not already protected.

Most residential land near Auckland’s coast is currently zoned for low-density housing. Because there is no mapped extent to show where the coastal environment begins and ends, there is a risk that intensification could occur in sensitive coastal environments without proper consideration of their natural character, cultural, landscape and amenity values. All of these values are limited and cannot be replaced. If higher and denser development is not carefully managed in the coastal environment, the coastal values could be permanently damaged or lost.

To avoid this, a stronger and more strategic planning approach is needed to guide intensification in the coastal environment —and where intensification should be reduced or not occur.

How is the Coastal Environment Qualifying Matter proposed to be implemented?

The Coastal Environment qualifying matter is proposed to apply in PC120, limiting and adjusting building heights and residential densities in urban environments near the coastline. PC120 applies the Coastal Environment qualifying matter in two ways:

1. Removing Height Variation Controls (HVCs)

Height Variation Controls (HVCs), which can allow for increased building heights, have been introduced in many areas near centres and rapid transit stations to allow for taller buildings

¹ The Hauraki Gulf Marine Park Act 2000 (HGMPA) relates to the coastal feature of the Hauraki Gulf / Tikapa Moana that lies between the east coast of Auckland, the Hauraki Plains, the Coromandel Peninsula and Great Barrier Island. Most of the gulf is recognised as being part of the Hauraki Gulf Marine Park. The HGMPA provides for the integrated management of the gulf, its islands and catchments – setting out the objectives for its management and recognising the relationship of tangata whenua with the gulf and its islands.

than would otherwise be permitted in the underlying zone. However, their initial rollout was broad and did not fully account for local context—such as sensitive coastal environments—where increased building heights may not be appropriate.

The council assessed natural character, amenity values and how sensitive each coastal area is to the effects of increased building heights. In making this assessment, the following three matters:

- **Natural character** – The degree to which an area includes or contributes to natural character values – considering matters like landform, vegetation, and a sense of openness
- **Landscape sensitivity** – How easily the area could be visually affected by tall buildings (e.g. views to/from the coast, how built-up the area already is) – accounting for the existing level and character of development and the degree to which any height changes could be absorbed by the landscape
- **Public use and enjoyment** – How much people use or value the area for recreation and coastal experiences.

These matters were used to assess a number of coastal or near-coastal locations across Auckland where HVCs were anticipated. Each area was assessed against these matters and assigned a score, which then determined whether proposed HVCs should be removed, amended or retained.

As part of this assessment, reference was also made to the scheduled Sites and Places of Significance to Mana Whenua and the Māori Alert layers from Auckland Council's Geomaps.

2. 100m Buffer Zoning Response

A 100m buffer from the indicative coastline² was used as a zoning response to help protect natural character, landscape, amenity and cultural values from the effects of residential intensification in the coastal environment. Where a site was proposed to have a Residential – Terrace Housing and Apartment Buildings (THAB) zone apply and was within 100m of the indicative coastline, the council instead retained the operative AUP zone. Exceptions to this principle exist where another qualifying matter applies to a site, such as, the Coastal Hazards qualifying matter or the Cohesive Zoning qualifying matter.

Further information on how the 100m buffer zoning response was applied, and the reasons for its application are discussed in the Section 32 Evaluation Report for the Coastal Environment qualifying matter.

²As outlined in Chapter F1 of the AUP, the indicative coastline, as illustrated on the GIS viewer, is “an approximate representation of mean high water springs, which is the level equalled or exceeded by the largest 10% of all high tides. Where the indicative coastline crosses a river mouth, the coastal marine area boundary has been defined by agreement between the Council and Department of Conservation.” It is acknowledged in this same chapter of the AUP that the mean high water springs has not been surveyed across the region on account of it having a dynamic and varying location – requiring definition by surveyor on a case-by-case basis.

Are there changes to the AUP provisions to respond to the Coastal Environment Qualifying Matter?

To accommodate the Coastal Environment qualifying matter, no changes are proposed to the AUP provisions, nor will any new overlay be introduced. The Coastal Environment qualifying matter has been applied as a strategic principle for determining the appropriate extent for HVCs and the removal of the THAB zoning within 100m of the indicative coastline.

For transparency, the PC120 map viewer has included a Coastal Environment layer to indicate where this qualifying matter has been applied. For more information on the Coastal Environment qualifying matter, please refer to the relevant section 32 evaluation report.

Further information

- For detailed information about the National Policy Statement on Urban Development 2020 (NPS-UD) [visit the Ministry for the Environment website.](#)
- For more information on the amendments to the RMA [visit the Ministry for the Environment website.](#)

Please note:

This information sheet is a summary document to assist with understanding Proposed Plan Change 120 – Housing Intensification and Resilience, which gives effect to Policies 3 and 4 of the National Policy Statement on Urban Development 2020 and addresses the requirements of Schedule 3C of the Resource Management Act 1991.

Proposed Plan Change 120 to the Auckland Unitary Plan was publicly notified by Auckland Council on 3 November 2025.

All information provided in this information sheet should be considered as being illustrative and indicative only. Users should take specific advice from qualified professional people before undertaking any action as a result of information obtained from this information sheet. The user waives and releases Auckland Council from any claims arising from use of the information provided in this information sheet.