



**November
2025**



Proposed Plan Change 120 Information Sheet #16

Lake Pupuke 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 identification and application of the Lake Pupuke 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In August 2025, the government amended the Resource Management Act 1991 (RMA) which enabled PC78 to be withdrawn.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PC78 was withdrawn in part from 5pm on 9 October 2025, and included withdrawal of the MDRS in PC78.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.

Pupukemoana/Lake Pupuke and its significance

Pupukemoana/Lake Pupuke is a 110 hectare lake on the North Shore located between the suburbs of Takapuna and Milford. Lake Pupuke is geologically significant as it was formed by a large compound explosion crater caused by an extinct volcano that was last active around 140,000 years ago. Lake Pupuke is unique as most other explosion craters within Auckland have been inundated by the sea. Lake Pupuke has survived because the lava field that surrounds it has acted as a barrier against erosion.

The AUP recognises Lake Pupuke and much of its edge for its geological, ecological and landscape significance, as well as its amenity values and cultural significance to Mana Whenua. AUP Overlays that apply to Lake Pupuke include those which identify it and its margins as a Significant Ecological Area and an Outstanding Natural Feature. Lake Pupuke is also a popular fishing, boating and scuba diving location.

Lake Pupuke is the only lake in the urban environment with residential zoning directly adjoining its edge (no open space buffer). A significant portion of the shoreline is under private ownership, predominantly in the form of lower density housing. Public access to the lakefront is provided at Killarney, Sylvan, Hospital Lakefront, Kitchener and Henderson Parks. Blocks adjoining the north, east and south are proposed for intensification through PC120 based on their proximity to Takapuna Metropolitan and Milford Town Centres.

Pupukemoana/Lake Pupuke as a Qualifying Matter

Intensification along the edge of Lake Pupuke was managed through PC78 through the application of a qualifying matter to properties which contained an Outstanding Natural Feature. Qualifying matters are those characteristics or values of some properties or areas that make the building heights or densities required in an area, inappropriate.

For more information on what qualifying matters are and how they are applied, refer to information sheet #13 Qualifying Matters.

The Outstanding Natural Feature qualifying matter applied through PC78 proposed to rezone affected properties to a lower intensity of development, however this same approach was not carried through to PC120. As such, without a qualifying matter being applied to Lake Pupuke most of the properties directly adjoining the edge of the Lake would be proposed as Residential – Terrace Housing and Apartment Buildings (THAB) zone, with a number of these enabling 50m building heights through what is called a Height Variation Control.

Intensification close to and around Lake Pupuke may result in adverse effects on the Lake's landscape, natural character and values. These adverse effects include dominance, loss of vegetation and obstruction of views to and from the Lake. These effects are considered to be inappropriate given Lake Pupuke's identification as a unique landform of Auckland's volcanic landscape and its role as a significant natural resource to the community.

For these reasons, and due to the unique risks arising from potential urban development directly adjoining the edge of the Lake, a qualifying matter is proposed that manages intensification adjacent to the Lake.

Currently in the AUP, residential zones require buildings to be set back 30m back from the edge of lakes, although some sites adjoining Lake Pupuke are subject to specific Lakeside Yard requirements. The Lakeside Yard creates space on the margins of Lake Pupuke which ensures buildings are adequately distanced from the Lake to maintain water quality and provide protection from natural hazards. A key concern is that the 30m Lakeside Yard setback is insufficient in this context to manage the scale of development which would otherwise be enabled by PC120 directly adjacent to Lake Pupuke.

The Lake Pupuke qualifying matter has been applied to PC120 to limit building heights and residential densities in urban environments near the Lake.

How the Qualifying Matter is proposed to be implemented

The council proposes to apply the Lake Pupuke qualifying matter in two ways through PC120:

1. Retention of Operative AUP zoning (Zoning response)

PC120 proposes to retain existing AUP zoning for a number of properties and sites adjacent to Lake Pupuke to limit intensification on the Lake's edges, informed by expert landscape assessment. The landscape assessment considered the existing residential development on the lake edge relative to the natural character of Lake Pupuke. It was identified that on the lake edge, development is typically integrated amongst vegetation and retains the legibility of the volcanic cone. The landscape assessment identified a zoning setback that accounts for the AUP overlays affecting sites and steeper topography that associates with the tuff crater and lake margins. The setback incorporates rational boundaries for a change of zoning response, for example, Lake View Road.

The zoning response seeks to manage cumulative effects on the values of Lake Pupuke from the intensity, consistency and urbanisation (yard dimensions, subdivision, height in relation to boundary) of built form which could result from PC120. The zoning response also intends to reduce effects on the Significant Ecological Area overlay identified on the Lake's edges and reduce the potential for sedimentation and contamination occurring because of increased building coverage and impervious area. Sites within the setback are proposed to retain their existing AUP zoning to deliver an approach that reflects the natural values and landscape character that are unlikely to be recoverable if subdivision, use, and development occurs.

2. Not imposing new Height Variation Controls (HVC Response)

Some of the land around the Lake is within the Takapuna walkable catchment, and as a result would be suitable for building heights of up to 50m (through a Height Variation Control or HVC) based on access to centres, transport, services, and amenities.

However, HVCs have not been applied to land adjacent to the Lake edge as expert landscape assessment considered that the scale of intensification that could otherwise occur around the Lake would affect the sense of openness and amenity that is experienced from the Lake and from parks and reserves on the Lake's edge.

This approach is intended to protect public views to the Lake from the surrounding environment and avoid dominance effects which would lead to the enclosure of the Lake and the parks and reserves along its boundaries. In conjunction with the zoning response, the HVC response adjoining Lake Pupuke will provide an appropriate transition of building heights and densities from the Lake edge toward Takapuna Metropolitan Centre and toward the coastal environment. Further information on how and why the HVC response has been applied is included in the Section 32 Evaluation Report for the Lake Pupuke Qualifying Matter.

Existing Auckland Unitary Plan provisions and the Pupukemoana/Lake Pupuke Qualifying Matter

To accommodate the Lake Pupuke qualifying matter, no changes are proposed to the existing AUP provisions, nor will any new Height Variation Control be introduced within the extent of the Lake Pupuke qualifying matter. It is implemented by retaining the AUP zoning.

The Lake Pupuke qualifying matter is identified with a layer in the PC120 Map Viewer to show the extent of the zoning and Height Variation Control response. The layer captures sites both within and outside of areas affected by intensification policies and RMA requirements and therefore Lake Pupuke is both a qualifying matter and a 'planning matter'.

For more detailed information on the Lake Pupuke qualifying matter and how it is proposed to apply, 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.

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