



Proposed Plan Change 120: Housing Intensification and Resilience (PC120) to the Auckland Unitary Plan (Operative in part)

SECTION 32

MĀORI ENGAGEMENT AND CONSULTATION SUMMARY REPORT

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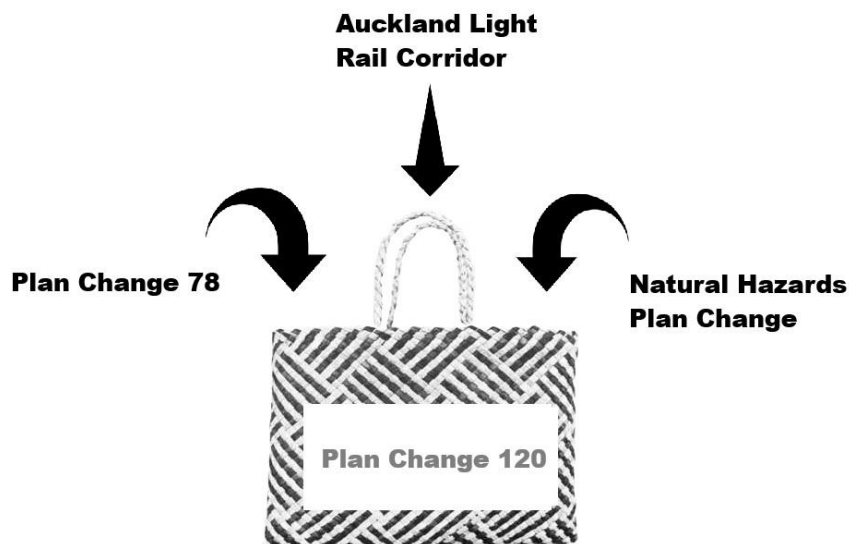
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1. Executive Summary

This report is related to the report entitled *Consultation and Engagement on a Potential Plan Change to Replace Proposed Plan Change 78 – Intensification*, which is a summary report on consultation undertaken with the community and key stakeholders during the development of *Proposed Plan Change 120 Housing Intensification and Resilience* (PC120). This Māori Engagement Consultation Summary Report provides a summary of the Māori engagement undertaken during the development of PC120.

PC120 includes feedback from three distinct Plan Change processes. Each process has varied in the level of engagement depending on legislative requirements and timeframes available to engage.



1.1 Māori engagement on Plan Change 78 (October 2021 to August 2022)

For Plan Change 78 (PC78), this engagement summary draws on engagement undertaken up to notification of the Plan Change between October 2021 and August 2022.

Attachment A: Plan Change 78 – Mana Whenua and Mataawaka Engagement Summary provides a summary of engagement feedback from mana whenua and mataawaka up to notification of PC78 on 18 August 2022.

1.2 Māori engagement on the Natural Hazards Plan Change (December 2023 to September 2025)

For natural hazards related content, the engagement draws on feedback from

individual and collective wānanga with mana whenua since December 2023. The engagement approach at the initiation of the Natural Hazards Plan Change project is set out in Figure 1 below.

The engagement was initially comprised of individual hui held over three months. These were to inform the purpose and scope of the proposed plan change. Following the setting of the project scope in April 2024, the project moved into an options development and risk tolerance phase. This included developing a draft Risk Tolerance Framework through Scenario Testing workshops held in October and November 2024. This engagement helped to set the direction for how Māori values, rights and interests were considered in the natural hazard related aspects of the plan development.

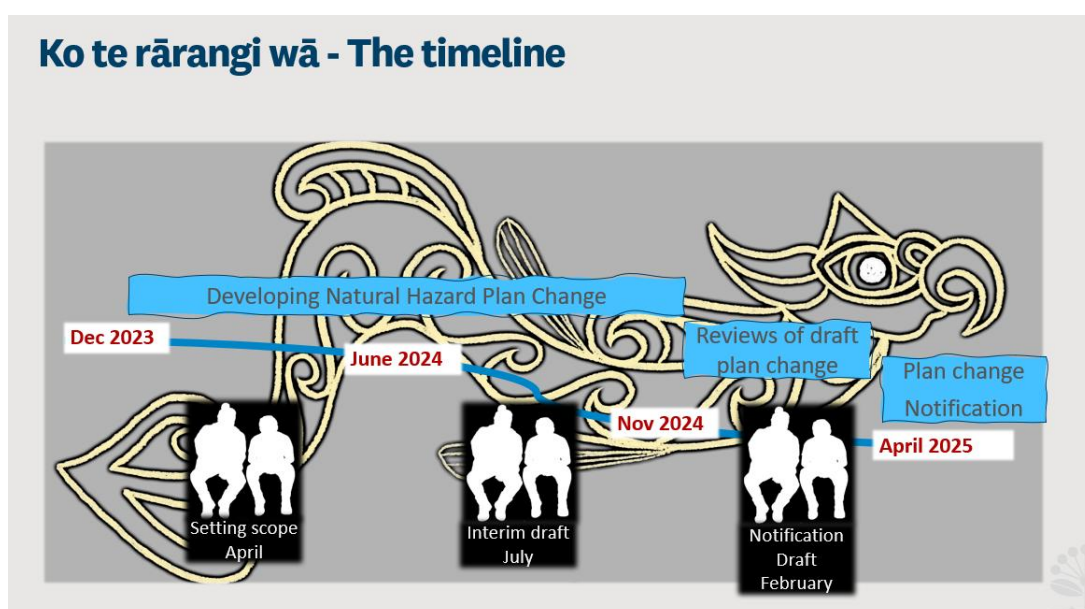


Figure 1: Natural Hazards Plan Change timeline as it was at January 2024

In order to test the draft provisions, a number of individual hui were held with mana whenua iwi authorities and affected marae to inform the detailed planning response, and section 32 options assessment report.

Representatives of Te Puni Kōkiri and the Māori Land Court were also consulted on impacts of natural hazards on Treaty Settlement Land and Māori Land. The Māori Land Court advised on Māori Reservations processes.

Five mana whenua groups provided Cultural Values Assessment (CVA) reports to inform the process. They were:

- Te Uri o Hau,

- Te Āhiwaru Waiohū,
- Ngaati Te Ata,
- Ngaati Whanaunga, and
- Ngaati Tamaoho.

Attachment B: Mana Whenua Engagement Summary Report: Risk Tolerance and Scenario Testing Wānanga [October – November 2024], November 2024, Version 0.2 – Final provides a summary of the key themes from feedback received from mana whenua kaitiaki through the October / November 2024 risk tolerance and scenario testing wānanga. Seventeen of the nineteen iwi authorities participated in one or more of the wānanga.

1.3 Mana Whenua engagement on PC120 from 22 August 2025 to 5 September 2025

PC120 is an Auckland Housing Planning Instrument which has been developed by Auckland Council in accordance with section 32 of the Resource Management Act 1991 (RMA) and Schedule 3C of the RMA as inserted by the Resource Management (Consenting and Other System Changes) Amendment Act 2025 (the Amendment Act). PC120 is being progressed through a Streamlined Planning Process under the RMA.

Due to the legislative time constraints that the development of PC120 was subject to, council has not been able to engage with Māori on the full detail of PC120 to the extent it normally would.

This has resulted in a focus on mana whenua engagement through Iwi Authorities, and with marae affected by natural hazards.

Feedback from Mataawaka and Māori communities has been considered as part of the wider community engagement and engagement on previous processes on PC78 and natural hazards but notably did not include the area within the Auckland Light Rail Corridor. This is because providing for intensification within the Auckland Light Rail Corridor was intended to be achieved through a variation to PC78¹ and was to be consulted on separately.

Attachment C1: Draft Replacement Plan Change - Whakarāpopoto August 2025 provides a high-level summary of what the council team have heard from engagement with mana whenua as they relate to urban intensification and natural hazard matters.

¹ Refer to section 1.4 of the PC120 s32 Overview Evaluation Report

It includes high level themes captured through CVAs and individual hui, including with affected marae relating to natural hazards. It sets out the proposed policy responses and relevant sections of the draft plan change material where that information could be found.

Attachment C2: Feedback from Mana Whenua on Replacement Plan Change [22 August – 5 September 2025] is written feedback provided by three iwi authorities during this engagement period, where the respective iwi agreed for the information to be made public. This should be read in conjunction with the themes raised in Table 3 of this report. The feedback from the mana whenua engagement process for PC120 was reported to an open Policy and Planning Committee workshop on 10 September 2025, and again at a Policy and Planning Committee extraordinary business meeting on 24 September 2025 to approve PC120 for public notification.

2. Management of sensitive information

Key themes from Māori engagement for all three processes has been summarised at a high-level in *Attachment C1 Replacement Plan Change Whakarāpopoto, August 2025*.

Due to the cultural sensitivities contained within the detailed information that has been shared through individual hui and captured through Cultural Values Assessments, this level of detail is not included in this report.

2.1 Māori Information Management Protocols

The following information protocols apply if requests for CVAs or individual hui information are received under the Local Government Official Information and Meetings Act 1982 (LGOIMA):

- i. Please direct any queries to Matthew Gouge, Senior Policy Planner or Phill Reid, Manager Auckland-wide Planning.
- ii. Prior to responding to any requests, the mana whenua entity who has provided the information must be advised of the information requested and its intended future use.
- iii. The respective mana whenua entity must provide confirmation in writing that the information can be used for the specified purpose, or may request that parts or all of the documents be redacted in accordance with section 7(1) and 7(2) of LGOIMA.
- iv. If mana whenua do not wish to share the information then the relevant provisions of LGOIMA shall be referenced and the request may be refused and / or information may be redacted in part or full before it is shared.

3. Scope of PC120

Relative to PC78, PC120 does the following:

a. Provides for same capacity as PC78

- i. The Plan Change meets a legislative requirement to provide for the same or more capacity for development as PC78 (approximately 2 million additional dwellings).

b. Natural hazards – down-zoning and tougher rules (including greater recognition of Māori rights and interests)

- i. There are stronger controls relating to managing risks from flooding, coastal hazards, landslides and wildfires, including provision being made for the relocation of five identified marae and/or urupā and stronger recognition of Māori rights and interests in managing natural hazard risk.
- ii. There are changes to the zoning (down-zoning) of approximately 12,000 properties that are at the highest risk from flooding and coastal hazards, e.g. some properties have been down-zoned from zones that enable multi-unit development to Single House Zone.

c. Medium Density Standards replaced

- i. Medium Density Residential Standards, that previously enabled three-dwellings per site up to three stories in height, have been replaced with different/improved standards.

d. Walkable Catchments – taller buildings enabled in 44 walkable catchments

- i. Building heights of up to 10 storeys are generally enabled in 22 walkable catchments, except where qualifying matters apply.
- ii. Building heights of up to 15 storeys are generally enabled in another 22 walkable catchments, except where qualifying matters apply.
- iii. Outside of walkable catchments, building height controls for most of the Terrace Housing and Apartment Buildings zone are increased to enable buildings of six storeys (up from five storeys), with a more permissive height in relation to boundary control.
- iv. The number of town and local centres identified for Terrace Housing and Apartment Buildings zone on land adjacent to them is increased from 46 to 57.

- e. **Corridors – taller buildings enabled along 24 Frequent Transport Network corridors**
 - i. Sites within approximately 200 metres either side of 24 corridors on Auckland Transport's Frequent Transport Network is zoned Terrace Housing and Apartment Buildings zone.
- f. **Residential zoning – changed proportion of zones**
 - i. There is an increase in the amount of land zoned for two-storey medium density housing (Residential – Mixed Housing Suburban Zone).
 - ii. There is a reduction in the amount of land zoned for three-storey medium density housing (the Residential – Mixed Housing Urban Zone).
- g. **Qualifying matters – new coastal environment, less special character around three train stations**
 - i. Qualifying matters are matters which make more intensive development inappropriate in a certain location or area. They protect things like cultural heritage, viewshafts and indigenous biodiversity.
 - ii. To give effect to the New Zealand Coastal Policy Statement and the Regional Policy Statement, a new qualifying matter has been applied to a small number of walkable catchments and NPS-UD policy 3(d) locations to make the building heights or density requirements less enabling of development.
 - ii. Removing areas of special character that are currently identified in the Auckland Unitary Plan, in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland and Morningside.
- h. **Light rail corridor included**
 - i. Intensification requirements have been applied to the previously excluded Auckland Light Rail Corridor, to give effect to policies 3 and 4 of the National Policy Statement on Urban Development (NPS-UD) and the specific intensification requirements set out in the RMA for increased buildings heights in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Ave and Mount Albert, except where qualifying matters apply.

3.1 What is not included in PC120?

- The city centre and the metropolitan centres (except for Westgate and New Lynn) are not part of PC120 as they have already been heard and decided through Plan Change 78. The remaining parts of PC78 were withdrawn by Auckland Council on 9 October 2025.

- PC120 primarily applies the National Policy Statement on Urban Development which is only within the urban parts of Auckland. In the rural areas, PC120 responds to natural hazard risks.
- Most of the PC120 provisions do not apply to the Hauraki Gulf Islands, however there is one regional rule that applies throughout the whole region requiring re-builds of materially damaged or destroyed buildings in natural hazard areas to demonstrate that the natural hazard risk is reduced to a tolerable or acceptable level, or otherwise reduced to as low as is reasonably practicable.

3.2 Information that is relevant but has not been engaged with mana whenua

3.2.1 Previous engagement with Mana Whenua on intensification along the Auckland Light Rail Corridor led by Auckland Light Rail Limited has not been considered.

A significant amount of technical work to understand the mana whenua values, rights and interests that exist within the Auckland Light Rail corridor was undertaken by Auckland Light Rail Limited in partnership with mana whenua.

This work was to inform the Notice of Requirement, Business Case and future urban development to inform the Auckland Light Rail Variation to Plan Change 78 during the period October 2022 to July 2023.

This information is held confidentially by the Ministry of Transport and participating mana whenua groups and would provide valuable technical information to understand the environmental, cultural, economic, social constraints and opportunities for development along this corridor.

There has been insufficient time to source this information and engage with mana whenua about how their inputs from that previous process might be useful to inform PC120.

Mana whenua will need to submit on those matters in the same way as the public.

3.2.2 Previous engagement with Mana Whenua on the Area Plan for parts of Puketāpapa and Albert-Eden Local Boards has not been considered²

The Area Plan sets a 30 year vision that guides and supports the development of Mt Roskill, Ōwairaka, Sandringham, Wesley, Waikōwhai and Three Kings, where significant growth is planned.

The Area Plan, which was adopted in May 2025, was developed in partnership with six of the

² [Area Plan for parts of Puketāpapa and Albert-Eden Local Boards](#)

fifteen mana whenua groups who expressed interest in being engaged on developing the area plan:

- Ngāti Whātua Ōrākei,
- Ngaati Te Ata Waiohua,
- Ngaati Whanaunga,
- Te Ākitai Waiohua,
- Te Ahiwaru, and
- Te Kawerau ā Maki.

This has resulted in a cultural narrative from the participating groups that are integrated throughout the Area Plan.

There has been insufficient time to review the Area Plan and engage with the relevant mana whenua groups to consider how this information can be considered as part of PC120.

It is likely that mana whenua will need to submit on those matters in the same way as the public.

4. Principles for engaging with Māori

The following engagement principles have guided the approach to engagement with Māori where the legislative requirements have allowed:

- We act in accordance with Treaty principles when engaging with Māori.
- We enable effective Māori participation through appropriate resourcing and open sharing of information/analysis in advance of hui. We present information in a manner that can be understood by all participants, including those not skilled in planning or science.
- We engage with mana whenua and mataawaka early in the project development lifecycle. We provide feedback on how feedback has been considered.
- We understand who we need to engage with and involve people at an equal level when engaging with Māori.
- We provide opportunities for Māori to contribute to decision-making processes and seek to incorporate mātauranga into policy.
- We seek to align and integrate Māori engagement with internal stakeholders. We look to capitalise on existing Council forums and relationships with Māori to provide a holistic message across the related workstreams. We understand that strong relationships are the key to undertaking effective engagement with Māori.
- We ensure enough time is set aside for Māori to consider matters within their whānau, hapū and iwi. We recognise the resourcing strain some Māori are under.

- We understand tikanga Māori and are comfortable with protocols around opening and closing hui.
- We recognise the nationally important relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.
- We deliver a consistent quality of engagement with Māori by adhering to the Engagement Performance Framework.



5. Engagement with iwi authorities

Schedule 1, Clause 3(1)(d) requires councils during the preparation of a proposed policy statement or plan to engage with mana whenua who may be affected, through iwi authorities.

Clause 3B of the Resource Management Act 1991 requires for the purposes of clause 3(1)(d), a local authority in consulting with iwi authorities to demonstrate that:

- It has considered ways in which it may foster the development of their capacity to respond to an invitation to consult,
- It has established and maintained processes to provide opportunities for those iwi authorities to consult with council and for council to consult with them,
- It has enabled iwi authorities to identify resource management issues of concern to them, and
- Indicates how those issues have been or are to be addressed.

The Plan Change is regionally significant and the following iwi authorities have been identified as being affected by the Plan Change process:

- Ngāti Wai,
- Ngāti Manuhiri,
- Ngāti Rehua Ngāti Wai ki Aotea,
- Te Rūnanga o Ngāti Whātua,

- Te Uri o Hau,
- Ngāti Whātua o Kaipara,
- Ngāti Whātua Ōrākei,
- Te Kawerau ā Maki,
- Ngāti Tamaoho,
- Te Ākitai Waiohū,
- Ngāi Tai ki Tāmaki,
- Ngāti Te Ata Waiohū,
- Te Ahiwaru Waiohū,
- Waikato-Tainui,
- Ngāti Paoa,
- Ngāti Whanaunga,
- Ngāti Maru,
- Ngāti Tamaterā, and
- Te Patukirikiri.

The engagement approach has provided targeted engagement with mana whenua through the different processes. The level of engagement has varied for each of the three plan change processes depending upon the time available for plan preparation and notification.

For all three processes council has offered both collective and individual hui with groups to share information on the Plan Change content and to seek their feedback. Council has provided independent resourcing for PC78 and PC120 (up to notification).

Post-notification of PC120, a 'Friend of Submitter' service has been provided specifically for Māori submitters. This is in addition to a general 'Friend of Submitter' service being available to the public.

Collective hui have been used to keep mana whenua informed, to share information on the Plan Change process and seek high level feedback on the general approach to inform the resource management issues of significance to mana whenua that needed to be considered.

Individual engagement has enabled council to engage on iwi specific issues within their rohe and better understand how the Plan Change might need to respond to impacts on mana whenua values, rights and interests.

For the Natural Hazards Plan Change, iwi authorities were invited to provide a CVA to improve councils' understanding of iwi specific issues of significance that the Plan Change needed to respond to.

5.1 Capacity of mana whenua to participate in PC120 engagement process

The streamlined planning process is not subject to Clause 4A of Schedule 1 of the RMA. These provisions are further pre-notification requirements concerning iwi authorities and they require council to provide iwi authorities with a copy of the draft Plan Change prior to notification and

to have particular regard to any advice received on that plan from iwi authorities. Under the Clause 4A requirement, council must provide adequate time and opportunity for the iwi authorities to consider the draft plan change and provide advice on it.

The council team have done their best to share the draft version of PC120 with mana whenua groups within the timeframes available. This was done via Microsoft OneDrive and through access to an online PC120 Consultation Viewer as soon as it was approved for consultation by the Policy and Planning Committee on 21 August 2025. Mana whenua have had access to an online Natural Hazards Consultation Viewer since November 2024.

Initial feedback from Mana Whenua on receipt of the draft PC120 information was that the amount of documentation shared with them is significant and they did not have sufficient time to review information and discuss it within their iwi and hapū, to fully understand how PC120 may impact on their values, rights and interests. The limited 2 week window to consider the draft PC120 was inadequate.

Following the formal notification of the plan change, council changes its role to being the plan change proponent in a statutory plan change process and must step back from mana whenua engagement and resourcing so as to treat all submitters equally. Formal submitter processes will be followed from the time of notification and mana whenua will need to participate in the submission process in the same way as the public.

6. Relevant Iwi Participation Legislation

The Crown has settled or is currently negotiating settlement for historical te Tiriti claims throughout Auckland. A review has been undertaken of the Deeds of Settlement of the following Treaty Settlement documents to understand whether there are any specific requirements that must be upheld as part of the Plan Change process.

Ten Treaty Settlements have iwi participation legislation that is relevant to Auckland Council:

- Ngāi Tai ki Tāmaki Claims Settlement Act 2018, section 15(4) and (5),
- Ngāti Whātua o Kaipara Claims Settlement Act 2013, section 14(4) and (5),
- Ngāti Whātua Ōrākei Claims Settlement Act 2012, section 13(4) and (5),
- Ngāti Manuhiri Claims Settlement Act 2012, [section 14\(4\) and \(5\)](#),
- Ngāti Tamaoho Claims Settlement Act 2018, [section 15\(4\) and \(5\)](#),
- Te Kawerau ā Maki Claims Settlement Act 2015 section 14(4) and (5),
- Te Uri o Hau Claims Settlement Act 2002, section 17(3) and (4),

- Waikato Raupatu Claims Settlement Act 1995, section 9(2),
- Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, and
- Nga Mana Whenua o Tamaki Makaurau Collective Redress Act 2014.

The following Treaty Settlements have been ratified but at the time of notification were pending legislation:

- The Crown and Ngāti Paoa signed a Deed of Settlement on 20 March 2021,
- Pare Hauraki – The iwi of Hauraki and the Crown signed a collective redress deed on 2 August 2018, and
- The Crown and Te Ākitai Waiohū signed a Deed of Settlement on 12 November 2021.

The following Treaty Settlements were considered to be directly impacted by PC120 and are discussed in more detail below:

- Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010.
- Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act.

6.1 Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010.

This legislation includes specific requirements for RMA planning documents to not be inconsistent with the vision and strategy of the Waikato River (Te Ture Whaimana). There is a specific Qualifying Matter relating to the vision and strategy of the Waikato River³. It has been confirmed that separate engagement with Watercare and Waikato-Tainui on this matter is on-going. This matter is also addressed in the Whakarāpopoto for PC120 included in Attachment C1.

6.2 Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014

This legislation recognises the whakapapa connections that Ngā Mana Whenua o Tāmaki Makaurau have with their ancestral maunga.

Separate engagement has been undertaken with the Tūpuna Maunga Authority during the development of the section 32 report for the Maunga Viewshafts and Height Sensitive Areas Qualifying Matter and that the Tūpuna Maunga Authority are likely to be active participants in the plan change process.

³ S771(c) and S770(c) of the RMA

Mana whenua iwi authorities who are party to the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 may also choose to provide feedback in their own right.

6.3 Impacts of Natural Hazards on Treaty Settlement Redress considered

As part of the Natural Hazards Plan Change, the latest Treaty Settlement datasets from Te Tari Whakatau were added to the Natural Hazards Consultation Viewer. GIS analysis was undertaken to highlight which natural hazards intersected with Treaty Settlement Land. This information was provided back to mana whenua to inform CVAs and individual engagement.

The findings are summarised at a high-level in Attachment C1. Replacement Plan Change – Whakarāpopoto August 2025, and have been used to inform the section 32 Options Assessment and planning response.

6.4 Impacts of Intensification on Treaty Settlement Redress – not assessed.

Due to the timeframes for engagement on the draft PC120, there has not been sufficient time to undertake the GIS analysis on which Treaty Settlement redress has resulted in changes to zoning or development potential of the land. There has also been insufficient time to ask mana whenua to provide a CVA or undertake more detailed engagement to understand how the Plan Change may impact the outcomes mana whenua can achieve on that land.

Analysis of the changes as a result of rezoning to Treaty Settlement Land has been undertaken of individual settlements. This was provided to mana whenua on 12 September 2025. This is something that mana whenua may choose to make a submission on once the Plan Change is notified.

7. Mana Whakahono ā Rohe

There are currently no Mana Whakahono a Rohe agreements with Auckland Council. At the time of notification, the following Mana Whakahono a Rohe agreement had been initiated but is yet to be finalised:

- Ngāi Tai ki Tāmaki

8. Protected Customary Rights Groups

There are currently no Protected Customary Rights Groups in Tāmaki Makaurau, however there are still a number of claims outstanding. These applicant groups have been directly notified of PC120 as a courtesy.

9. Consultation with Mataawaka

Schedule 1, clause 3(2) states that a local authority may consult anyone else during the preparation of a proposed policy statement or plan and that consultation must be in accordance with section 82 of the Local Government Act 2002.

In particular the principles of consultation section 82(1)(a) to (f) inclusive and must ensure that it has in place processes for consulting with Māori.

Due to the timeframes and uncertainty around the scope of PC120 it has been difficult to consult with Mataawaka.

For PC78, engagement was undertaken with Urban Māori Authorities and Te Kotahi a Tāmaki Marae Collective. Targeted engagement has also been undertaken with Te Kotahi a Tāmaki Marae Collective in relation to natural hazards elements of the Plan Change. For all other aspects of the Natural Hazards Plan change, engagement with Māori communities was captured as part of the wider engagement process.

9.1 Marae

Marae are a critical cultural connection hub not only for mana whenua and mataawaka, but also increasingly for wider communities throughout the region. There are 42 marae which Auckland Council works with in Tāmaki Makaurau.

Targeted engagement was undertaken with the following marae:

- Whataapaka Marae,
- Puukaki Marae,
- Makaurau Marae,
- Umupuia Marae, and
- Te Henga Marae.

Collective engagement was undertaken with Te Kotahi a Tāmaki Marae Collective at their hui at Te Mahurehure Marae on 28 March 2025.

It is proposed to send a pānui to all marae to inform them of the Plan Change when it is notified.

9.2 Housing and Business Development Capacity Assessment (HBA)

Clause 3.23 of the National Policy Statement Urban Development requires a Housing and Business Development Capacity Assessment (HBA) to be prepared. Every HBA must include analysis of how the relevant local authorities planning decisions and provision of infrastructure affects the affordability and competitiveness of the local housing market.

The analysis must include an assessment of how well the current and likely future demands

for housing by Māori and different groups in the community (such as older people, renters, homeowners, low-income households, visitors, and seasonal workers) are met, including the demand for different types and forms of housing (such as for lower-cost housing, papakāinga, and seasonal worker or student accommodation).

Ministry for the Environment has provided guidance to councils on how to prepare a HBA for assessing Māori housing demand.⁴

The assessment requires consideration of:

- Māori data sovereignty,
- Engagement with mana whenua,
- Qualitative assessments, and
- Quantitative assessments.

Council's current HBA does not include this assessment, therefore it is not able to be used to inform this process.

Work is being programmed as part of the Future Development Strategy which is due for review in 2026, and will be incorporated through the full review of the Auckland Unitary Plan which is due to commence in late 2026.

10. Māori Engagement Timelines

For PC120, the approach to engagement has resulted in the integration of three separate plan changes into one.

The approach to engagement for each plan change has varied due to different statutory processes and timeframes that needed to be met.

The three components of the Plan Change that were subject to engagement with mana whenua and mataawaka are described in more detail below:

10.1 Plan Change 78 – Intensification Planning Instrument (IPI) (October 2021 to August 2022)

The Plan Change 78 – Intensification Planning Instrument applied to the urban environment of Tāmaki Makaurau. During the plan development process it was decided to remove the Auckland Light Rail Corridor from the Plan Change area as illustrated in Figure 2. Therefore mana whenua were not engaged on this as part of Plan Change 78. The feedback from Māori engagement during this time did not respond to impacts of natural hazards or the Auckland

⁴ [Maori-housing-demand.pdf](#)

Light Rail Corridor.

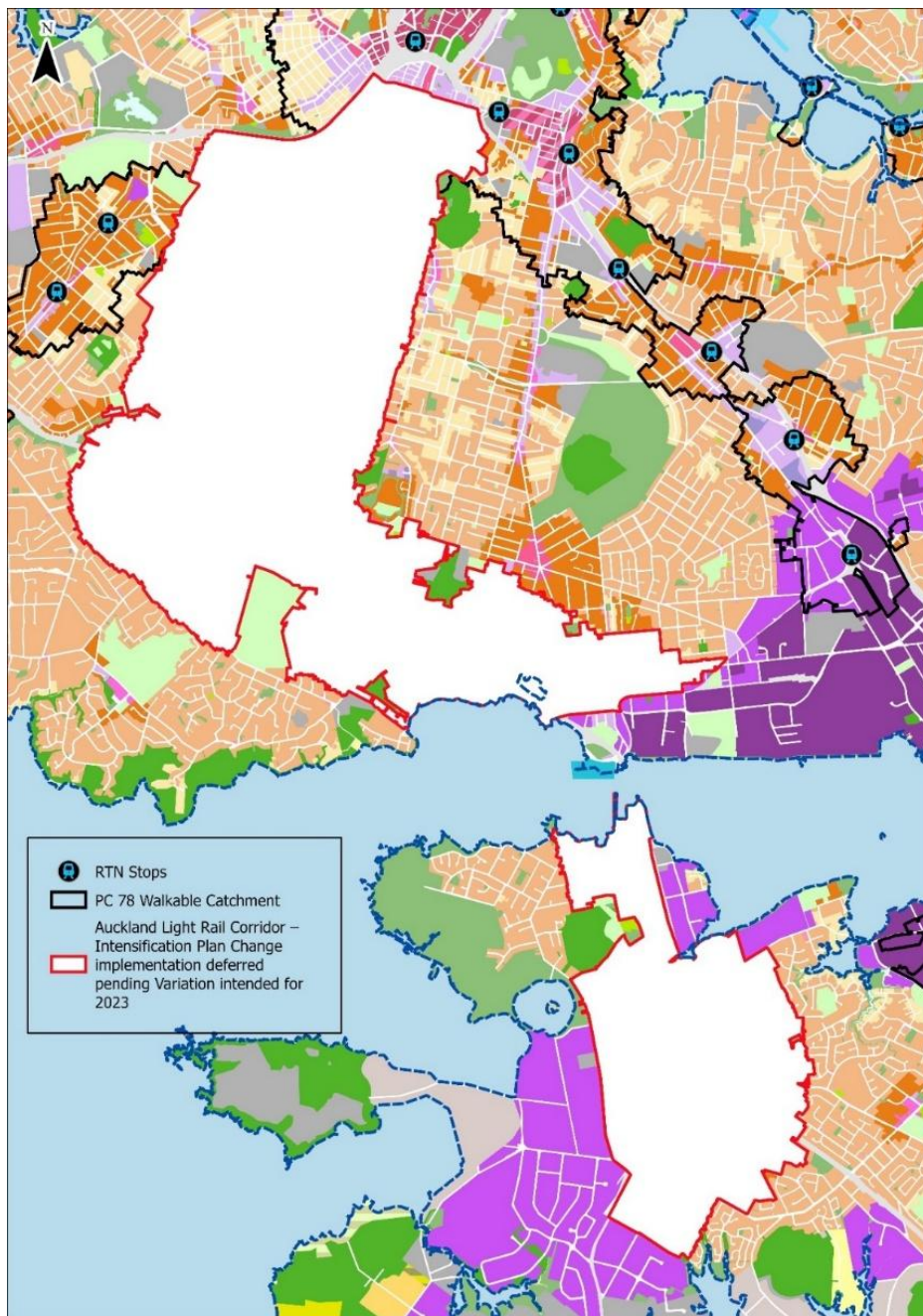


Figure 2: Auckland Light Rail Corridor

Table 1: High-level timeline of the engagement on Plan Change 78

Plan Change 78 : Mana Whenua Engagement (Engagement Timeline: October 2021 to August 2022)	
	Council follow up
7 December 2021	Governance hui with Tāmaki Makaurau Mana Whenua Forum
18 December 2021	Kaitiaki workshop
	Council follow up
22 February 2022	Intensification and Residential Workshops with Tāmaki Makaurau Mana Whenua Forum
10 March 2022	Preliminary Response Hui
	Council follow up
	Preliminary response public engagement (April – May 2022)
19 May 2022	Report back on public engagement
8/9 June 2022	Draft Plan Change Sessions
14/17 June 2022	Facilitated Workshops
11/17 August 2022	Pre-notification Hui
mid-August 2022	Planning Committee, then notification

Since October 2021, mana whenua groups recognised by Auckland Council, mana whenua forums, and co-governance and co-management entities were engaged for PC78.

Similarly, organisations which provide for mataawaka within Tāmaki Makaurau were engaged with, including urban Māori authorities, marae collaborations, and individual marae representatives.

The engagement process included:

- collective and individual hui, with collective hui held on average every four to six weeks (excluding the Christmas period);
- visits to individual marae;
- subject matter workshops;
- presentations and updates to Mana Whenua forums and co-governance and co-management entities;
- the appointment and funding of an independent professional planner to assist representatives to interpret and draft their advice; and
- a formal process of providing pre-notification advice on the draft IPI in a timeframe when advice can be meaningfully considered.

The approach taken from the outset was early, iterative engagement in accordance with tikanga where practicable. Given the breath of the PC78, the council team pre-circulated initial assessments to representatives to aid in the consideration of their advice.

Advice received at hui was then considered by the council team with any outcomes (including no change) discussed with representatives at subsequent hui. Hui notes were circulated for the benefit of all representatives, including those that could not attend.

Feedback from iwi was extensive. The widespread intensification enabled by the NPS-UD and Medium Density Residential Standards (MDRS) had the potential to affect Māori both negatively and positively. This includes with respect to culturally significant sites and landscapes, Treaty Settlement redress land, and urban form.

Key themes included:

- Impacts of greater intensification on unscheduled cultural heritage sites was a common concern,
- The protection of maunga (volcanic) viewshafts and height sensitive areas is of particular importance to Mana Whenua as an important part of the cultural landscape,
- Retaining protections for significant ecological areas, outstanding natural landscapes, coastal areas of high and outstanding natural character and ridgeline protection areas have also been identified as being culturally important. These matters are proposed to be protected as Qualifying Matters,
- The ability for infrastructure to appropriately manage water is a central issue for iwi and hapū, as is ensuring that development does not exacerbate flooding within the region, and
- The benefits of greater housing choice and supply options is also acknowledged.

A summary of the engagement process, mana whenua feedback and council's responses is included in Attachment A⁵ of this report.

10.2 Replacement Plan Change – PC120 (Natural Hazards, Plan Change 78 Intensification, and the Auckland Light Rail Corridor)

PC120 has two distinct elements, providing for both urban intensification and a strengthened response to natural hazard risks within Tāmaki Makaurau. These two strands of the plan change have been developed on different timescales, with the natural hazard related work occurring over a longer timeframe as it was originally conceived as a 'stand-alone' plan change.

The pace of the development of the urban intensification elements of the plan change coupled with the evolving nature of the enabling legislation has prevented the opportunity for a high level of engagement with iwi authorities and Māori organisations more generally. This is to some extent mitigated by the fact that many of the intensification principles and policies being applied in PC120 remain as they were for PC78. On this basis, the extensive engagement undertaken during the development of PC78 along with submissions (and some hearings completed) for that plan change has informed the content of PC120.

⁵ Section 3 of the section 32 – Overview Evaluation Report for Proposed Plan Change 78

10.2.1 Natural Hazards Plan Change (December 2023 to Sept 2025)

The 19 recognised mana whenua groups in Tāmaki Makaurau were invited and resourced to be involved in the project at the outset. They have been kept apprised of work and have provided their advice to ensure it can meaningfully be considered and influence the development of the plan change. This is so these iwi and hapū can exercise their rangatiratanga and kaitiakitanga obligations within Tāmaki Makaurau.

With respect to mataawaka entities, the relationship with Auckland Council is one of council supporting these groups to achieve a level of understanding equivalent with the broader community⁶. Mataawaka have been informed of the development of the plan change and how they may input into the plan change process to provide for their interests. This has primarily been through focus groups and the Te Kotahi ā Tāmaki marae collective.

The advice received through Māori engagement has informed the council policy position on natural hazard responses. These responses include much stronger recognition of mana whenua interests in natural hazard assessments and responses, more active protection of Māori Land, Treaty Settlement Land and culturally significant sites, and bespoke relocation provisions for several identified marae and urupā which are likely to be affected by significant natural hazard risks now and in the near future.

Specifically with respect to clause 3B of Schedule 1 of the RMA, efforts have been made to ensure that the complex natural hazard information contained in PC120 has been presented to iwi authorities in a manner focused on resource management issues that the council understand are of concern to them. This understanding was compiled from feedback from Māori engagement captured through PC78 processes, collective hui with mana whenua on natural hazards risk tolerance and scenario testing, cultural values assessments and individual hui and is summarised in *Attachment B – Whakarāpopoto, August 2025*.

This has built upon significant information council already holds of mana whenua rights and interests through information sources such as Iwi Planning Documents and advice received on related plans and strategies including Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

Table 2 provides a high-level summary of engagement undertaken for natural hazards.

⁶ Te Tiriti Article 3: 'Oritetanga'

Table 2: High-level timeline of the engagement on the Natural Hazards Plan Change.

Other Natural Hazards Māori Engagement (Engagement Timeline: August 2023 to March 2024)	
Engagement with Māori as part of other council processes and plans that has helped inform our base understanding of the issues.	
Aug 2023	Public consultation on draft Recovery Plan and draft Making Space for Water (MSFW) programme initiatives and funding options
Feb – Mar 2024	Consultation on draft Long-Term Plan (10 year budget) incorporating draft Recovery Plan and draft Making Space For Water programme activities and projects
Natural Hazards Plan Change : Māori Engagement (Engagement Timeline: August 2023 to October 2025)	
Engagement with Marae	
Nov 2024 – Jan 2025	Engagement with affected Marae
28 March 2025	Presentation to Te Kotahi ā Tāmaki collective – Climate Change Symposium (Te Mahurehure Marae)
Collective Engagement	Natural hazards risk tolerance and scenario testing
14 December 2023	Whakawhanungatanga hui – seeking expressions of interest to be involved
4 and 5 April 2024	Scope discussion hui
Collective Engagement	Natural hazards risk tolerance and scenario testing
18, 21, 30 October 2024	Wānanga tuatahi – Technical wānanga – Introduction to natural hazards plan change.
1,5, 7 November 2024	Wānanga tuarua – Technical wānanga – Natural hazards scenario testing
12 November 2024	Update to Infrastructure and Environmental Services – Interim Mana Whenua Forum on the Plan Change.
22 November 2024	Wānanga tuatoru – Feedback session – Ngā whakautua o ngā hui o runga
November 2024	Mana Whenua Engagement Summary Report: Risk Tolerance and Scenario Testing Wānanga, November 2024
11 December 2024	Mana Whenua present to Policy and Planning Committee
Individual Engagement / Plan change scope hui	
January - April 2024	Individual iwi authority hui combined with Natural Environment Strategy roadshow
Individual Engagement / Cultural Values Reports	
Jan – July 2025	Individual hui to brief iwi authorities on CVA opportunity and to review sites on the Natural Hazards Consultation Viewer.
21 Jan 2025	Invitation sent to mana whenua iwi authorities inviting them to prepare a CVA and providing access to the Natural Hazards Consultation Viewer.
31 Jan 2025	Follow up email sent to mana whenua iwi authorities inviting them to prepare a CVA.
17 Mar 2025	Pānui sent with an update of progress on the Natural Hazards Plan Change.
24 Mar 2025	Provided GIS analysis of impact of natural hazards on Sites of Significance to Mana Whenua, Marae, Māori Land and Treaty Settlement Land to support CVAs.
13 April 2025	Provided GIS analysis of impact of natural hazards on Individual

Other Natural Hazards Māori Engagement (Engagement Timeline: August 2023 to March 2024)	
	Treaty Settlements (analysis tailored by group).
April – June 2025	Individual Hui to review impacts of natural hazards on individual sites within their rohe.
30 July 2025	Closing date for CVAs. Five received.
Integration of mana whenua feedback into draft Natural Hazards provisions.	
1-27 August 2025	CVA Analysis and Integration of natural hazards response into draft Plan Change documentation.
21 August 2025	Integration of Natural Hazards with Replacement Plan Change engagement

Natural Hazards Plan Change: Risk Tolerance and Scenario Testing Wānanga (Oct – Dec 2024)

For the Natural Hazards Plan Change, collective hui were organized at the outset to introduce mana whenua to the Plan Change process and to seek high level direction on the resource management issues of concern to mana whenua and options to be considered as part of a planning response.

Whakawhanungatanga hui were held on 14 December 2023, and these were followed with individual and then collective hui on 4 and 5 April 2024 to discuss the scope of the plan change.

Following a period of options development, wānanga were held on the following dates:

- Wānanga tuatahi – Technical wānanga – Introduction to natural hazards plan change (18, 21, 30 October 2024),
- Wānanga tuarua – Technical wānanga – Natural hazards scenario testing (1, 5, 7 November 2024), and
- Wānanga tuatoru – Feedback session - Ngā whakautua o ngā hui o runga (22 November 2024)

Wānanga tuatahi and tuarua were offered online and in-person on three separate dates to enable mana whenua the option to attend at their convenience. Information was pre-circulated prior to the sessions.

Wānanga tuatoru was a single online wānanga to report back the feedback received to date as the Consultation Summary Report was being finalised. At the final wānanga mana whenua were invited to access the Natural Hazards Consultation Viewer and the opportunity for their own mātauranga-ā-iwi to be applied to better inform council's understanding of land instability. All sessions were recorded.

The intent of the wānanga was not to capture individual views, rather to encourage free and frank kōrero with mana whenua kaitiaki on the regionally significant issues / risks of natural

hazards. These sessions highlighted a shortcoming in the approach insofar as it addressed Treaty Settlement Land (Governance level discussion). This was responded to via the commissioning of Cultural Values Reports to provide those iwi authorities with a targeted opportunity to provide their views to the council team.

The common themes were summarised in the Mana Whenua Engagement Summary Report: Risk Tolerance and Scenario Testing Wānanga [October – November 2024], November 2024 and were reported back to an 11 December 2024 Policy and Planning Committee workshop on risk tolerance.

A copy of the Mana Whenua Engagement Summary Report – Risk Tolerance and Scenario Testing can be found in *Attachment B*.

Further collective hui were held on 20 & 21 March 2025 to update and inform mana whenua of:

- The changing context – the Natural Hazards Plan Change, Plan Change 78, and the Integrated Planning Approach for Intensification,
- CVA progress and support update,
- Work and progress to date with the Natural Hazards Plan Change – recommended approach,
- Māori specific matters - CVAs, Māori provisions, policy direction, and
- Timeline and next steps.

Natural Hazards Plan Change Cultural Values Assessments and Individual Engagement (Jan – August 2025)

In January 2025 all iwi authorities were invited to prepare a Cultural Values Report (CVA) in response to the Natural Hazards Plan Change. Each iwi authority was provided with access to the Natural Hazards Consultation Viewer and a tailored GIS analysis that showed which natural hazards intersected with Sites of Significance to Mana Whenua, Marae, Māori Land and any Treaty Settlement Land identified in ratified Deeds of Settlement relevant to them to support their analysis.

Individual engagement with interested groups involved a review of the tailored GIS Analysis for their respective entities Natural Hazards Consultation Viewer with the Policy Team and provide high level summary of potential impacts / outcomes they would like to see as a result of the Plan Change.

The following groups provided a CVA:

- Ngaati Te Ata Waiohau,
- Te Uri o Hau,
- Te Āhiwaru Waiohau,
- Ngaati Tamaoho, and
- Ngaati Whanaunga.

The following groups did not have capacity to prepare a CVA at the time, and chose to participate in individual hui instead:

- Te Kawerau ā Maki,
- Ngāti Paoa, and
- Ngāi Tai ki Tāmaki.

The high-level summary of key themes from collective and individual engagement and CVAs and the Natural Hazards Plan Change response is captured in *Attachment C1. Replacement Plan Change Whakarāpopoto August 2025 report*.

10.2.2 PC120 (Inclusion of Natural Hazards, Plan Change 78 and Auckland Light Rail Variation to PC78)

Schedule 1, Clause 3(1)(d) requires councils during the preparation of a proposed policy statement or plan to engage with mana whenua who may be affected, through iwi authorities.

Clause 3B of the Resource Management Act 1991 requires for the purposes of clause 3(1)(d), a local authority in consulting with iwi authorities to demonstrate that:

- It has considered ways in which it may foster the development of their capacity to respond to an invitation to consult; and
- It has established and maintained processes to provide opportunities for those iwi authorities to consult with council and for council to consult with them; and
- It has enabled iwi authorities to identify resource management issues of concern to them; and
- Indicates how those issues have been or are to be addressed.

Council provided a copy of the draft Plan Change text and maps to mana whenua on 22 August 2025 and commenced collective and individual engagement with groups to support them to understand the material and provide a response within very tight timeframes. Where the plan change has been unable to respond to the issues of concern which have been raised, that this is clearly set out for iwi in a manner that may enable a submission on PC120.

Māori engagement on the draft PC120 included feedback from three distinct plan change processes. All three processes achieved a high level of mana whenua participation. Given the short timeframe for engagement on the PC120 material, the participation of sixteen of the nineteen iwi authorities signifies the high level of interest mana whenua has with this draft Plan Change.

An overview of the three processes is summarised in the table below:

	Plan Change 78 – Intensification	Natural Hazards Plan Change	Replacement Plan Change
Pre notification engagement	October 2021 – August 2022 (10 months)	October 2024 to September 2025 (12 months)	22 August – 5 September 2025 (2 weeks)

	Plan Change 78 – Intensification	Natural Hazards Plan Change	Replacement Plan Change
Iwi Authorities who participated in one or more collective or individual hui	1. Ngāi Tai ki Tāmaki 2. Ngāti Paoa Trust Board 3. Ngāti Tamaoho 4. Ngāti Tamaterā 5. Ngaati Te Ata 6. Ngāti Whātua Ōrākei 7. Te Ahiwaru Waiohūa 8. Te Kawerau ā Maki 9. Te Rūnanga ō Ngāti Whātua 10. Te Ākitai Waiohūa 11. Te Patukirikiri 12. Ngāti Rehua Ngātiwai ki Aotea 13. Ngāti Maru 14. Waikato-Tainui	1. Ngāi Tai ki Tāmaki 2. Ngāti Paoa Iwi Trust 3. Ngāti Tamaoho 4. Ngāti Tamaterā 5. Ngaati Te Ata 6. Ngāti Whātua Ōrākei 7. Te Ahiwaru Waiohūa 8. Te Kawerau ā Maki 9. Te Rūnanga ō Ngāti Whātua 10. Te Ākitai Waiohūa 11. Te Patukirikiri 12. Ngāti Rehua Ngātiwai ki Aotea 13. Ngāti Maru 14. Waikato-Tainui 15. Ngāti Manuhiri 16. Ngāti Whātua ō Kaipara 17. Te Uri o Hau 18. Waikato-Tainui	1. Ngāi Tai ki Tāmaki 2. Ngāti Paoa Iwi Trust 3. Ngāti Tamaoho 4. Ngāti Tamaterā 5. Ngaati Te Ata 6. Ngāti Whātua Ōrākei 7. Te Ahiwaru Waiohūa 8. Te Kawerau ā Maki 9. Te Ākitai Waiohūa 10. Ngāti Rehua Ngātiwai ki Aotea 11. Ngaati Whanaunga 12. Ngāti Maru 13. Waikato Tainui 14. Ngāti Manuhiri 15. Ngāti Whātua ō Kaipara 16. Te Uri o Hau
Iwi authorities who were invited but did not participate	1. Ngātiwai 2. Ngāti Manuhiri 3. Ngāti Whātua ō Kaipara 4. Ngāti Paoa Iwi Trust 5. Te Uri o Hau 6. Ngaati Whanaunga	1. Ngātiwai	1. Ngātiwai 2. Te Runanga ō Ngāti Whātua. 3. Te Patukirikiri
Written inputs	Submissions received: • Ngāti Whātua Ōrākei • Ngaati Te Ata • Ngaati Tamaoho • Tupuna Maunga o Tāmaki Makaurau Authority • Independent Māori Statutory Board	Cultural Values Assessments received: • Te Uri o Hau • Te Āhiwaru Waiohūa • Ngaati Te Ata • Ngaati Whanaunga • Ngaati Tamaoho	Written feedback tabled from: • Ngāti Tamaoho
Co-governance Entities engaged	• Tūpuna Maunga o Tāmaki Makaurau Authority • Pukekiwiriki Pā Joint Committee	• Tūpuna Maunga ō Tamaki Makaurau	• Tūpuna Maunga ō Tamaki Makaurau
Forums	Tāmaki Makaurau Mana Whenua Forum (Governance)	Tāmaki Makaurau Mana Whenua Forum (Governance) Interim Mana Whenua Kaitiaki Forum	None
Marae Engagement	• Te Kotahi-ā-Tāmaki Maraе Collective • 8 mataawaka and taurahere marae were identified that may be affected by residential intensification on their boundaries.	• Te Kotahi-ā-Tāmaki Maraе Collective • Whataapaka Maraе • Umupuia Maraе • Puukaki Maraе • Makaurau Maraе • Te Henga Maraе	Te Kotahi ā Tamaki Maraе Collective
Māori organisations	Manukau Urban Māori Authority (MUMA) Te Whanau ō Waipareira Trust (contacted but no response)	None	None

	Plan Change 78 – Intensification	Natural Hazards Plan Change	Replacement Plan Change
Māori communities	Captured through general engagement process.	Captured through general engagement process.	None

PC120 (Engagement Timeline: July 2025 to October 2025)	
21 & 22 July 2025	Collective Hui to inform of replacement plan change
18 August 2025	Draft Replacement Plan Change is publicly available (Policy and Planning Committee Agenda)
20 August 2025	Resource Management (Resource consenting and other matters) Amendment Act 2025 – receives Royal Ascent.
21 August 2025	Policy and Planning Committee Extraordinary Council meeting on Draft Replacement Plan Change
22 August 2025	Draft Plan Change material is sent to mana whenua.
25 August 2025	Pānui sent to mana whenua with additional information on Qualifying Matters.
25 August 2025	Hui with Tūpuna Maunga Authority re Maunga Viewshafts.
26 & 27 August 2025	Collective (governance and kaitiaki) mana whenua engagement (hybrid hui) to discuss the draft PC120 and respond to specific aspects
25 August – 5 September 2025	Individual engagement with mana whenua:
24 September 2025	Policy and Planning Committee approve PC120 for notification (and partial withdrawal of Plan Change 78).
Before 30 October 2025	Prepare to notify the plan change - Report back to mana whenua on how the final notification version of the plan change address the matters raised - Assist mana whenua with information for the preparation of submissions.
3 November 2025	Replacement Plan Change notified

Draft PC120 (22 August – 5 September 2025)

Engagement on the draft Plan Change occurred over a 2-week period. All nineteen groups were invited to participate; sixteen groups participated in one or more collective or individual hui. Targeted engagement occurred with Tūpuna Maunga ō Tāmaki Makaurau Authority.

Due to the timeframes available to engage, no further engagement has been undertaken with Te Puni Kokiri, Māori Land Court, Māori organisations or Māori communities.

Feedback received from mana whenua from collective and individual hui on the draft Replacement Plan Change is summarised below in Table 3:

Table 3: Summary of Mana Whenua Feedback on the draft PC120

Mana Whenua Feedback
Limited ability of mana whenua to actively participate in the draft Plan Change process⁷ The approach to engagement does not meaningfully take into account Te Tiriti principles of partnership, redress, equity and active protection. • Mana whenua feel there hasn't been sufficient time to provide meaningful input. • Not enough time to read the documents and understand how it impacts our values, rights and interests. • The amount of information shared is overwhelming. • Two weeks is a really narrow window – material is substantial, chapters, viewer, legislation only just made into law. • This is the opposite of what the RMA asks of partners. • Our issues sit in the detail – there is insufficient time to provide meaningful input in the timeframes.
Impacts on abilities of people and communities to provide for their cultural well-being and for their health and safety given the amount of intensification proposed. Many groups questioned why two million new dwellings were required to be provided, without adequate time to consider the impacts on the sustainable management of the region's natural and physical resources. Concerns were raised about the impacts of intensification on environmental values, increasing the number of people vulnerable to natural hazards and sea level rise. Pushing people into a city that is almost full already will result in more people being vulnerable to effects of flooding, natural hazards and sea level rise.
Lack of explanation of how the draft PC120 has taken into account the values and aspirations of iwi and hapū for urban development Under the National Policy Statement Urban Development 2020 Objective 6 and Policy 9 are relevant. In relation to urban environments when preparing RMA planning documents and Future Development Strategies, councils must: a. involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and b. when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and c. provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and d. operate in a way that is consistent with iwi participation legislation. Some groups queried whether council had considered whether there was the demand for this type of intensive housing – will this be somewhere people want to live, and questions of how iwi and hapū aspirations for housing are being met within each of the zones e.g., aspirations of Marae, papakāinga to support current and future generations?

Mana Whenua Feedback

Consideration of the impacts on mana whenua values, rights and interests within the Auckland Light Rail Corridor.

- Within the Auckland Light Rail Corridor insufficient consideration of impacts on mana whenua values, rights and interests has been undertaken by Auckland Council in preparing the draft Plan Change.
- Mana whenua were involved in detailed planning for integrated transport and urban development through the Auckland Light Rail Project.
- The baseline technical work included assessments and mana whenua engagement of how to avoid, remedy or mitigate adverse effects on mana whenua values, rights and interests within the corridor. [information management protocols apply].
- Some groups questioned whether this information was being considered by council in planning for growth within the Auckland Light Rail Corridor and if not recommended the base technical reports and Business Case (including Appendices) be used to inform decision-making on where intensification should occur.
- Mana whenua seek stronger objectives, policies, rules and assessment criteria to consider the impacts of intensification on mana whenua values, rights and interests to enable these matters to be considered within this area.

Lack of consideration of the impacts of wastewater and stormwater overflows on mana whenua cultural associations with waterways and the coast in Tāmaki Makaurau. These are well documented through statutory acknowledgements in Treaty Settlements.

Concerns that the draft Plan Change does not provide adequate opportunity to have particular regard to Part 2, section 7 – other matters in managing the use, development, and protection of natural and physical resources to safe-guard the life-supporting capacity of waterways, coastal areas and ecosystems including (but not limited to):

- (a) kaitiakitanga;
 - (b) the efficient use and development of natural and physical resources;
 - (d) intrinsic values or ecosystems
 - (g) any finite characteristics of natural and physical resources
- Our current water and infrastructure isn't up to standard and cannot cope with current level of development
 - Mana Whenua know where the systems are at capacity and where sewage overflows are occurring.
 - We already are aware of developments where sewage needs to be trucked off site as the system cannot cope.
 - Lack of adequate infrastructure planning to plan for growth will result in more waste into our harbours every time it rains.

Impacts on the increased pressure on the region's natural and physical resources to respond to growth

Impacts on wai (Water)

Water supply and management is an essential life sustaining element. The regions already overallocated water resources including groundwater, Waikato awa and existing water catchments will be significantly impacted as a result of intensification without appropriate planning.

⁷ Part 2, Section 8 – Treaty of Waitangi

Mana Whenua Feedback

New developments should be required to have their own rainwater harvesting to take pressure off the network.

Impacts on whenua (land)

The loss of productive land for food production, to support the increased population.

Will need to consider where our biosolids will go once Te Motu ā Hiaroa is full.

Greater demand for waste management / landfills in rural areas which impact our cultural landscapes and put pressure on our existing infrastructure and roading network from increased truck movements.

Impacts on āngi (air)

Impacts of air quality along transport corridors where intensification is planned need to be considered.

Impacts on Māori Cultural Landscapes, including Maunga and Cultural Heritage

- Mana whenua have provided significant cultural landscape input into Area Plans (e.g. for Puketāpapa and Albert-Eden) that should be considered
- Mana whenua have noted that they provided a significant level of input into cultural constraints and opportunities for the Auckland Light Rail project, including mapped layers of significant heritage places
- Support for the retention of maunga viewshafts and concern that the cultural values of viewshafts are not well understood
- Concern that existing viewshafts do not sufficiently provide for culturally significant views to and between maunga, with references to previous work on Isthmus Heritage Themes Mapping
- Concern are no similar protections for the maunga south of Mangere and that decisions about intensification now could foreclose options for future protection.
- Ongoing concern that decisions about where to increase height and density are made without consideration of Māori cultural heritage, since most sites are not scheduled.
- Mana whenua have pointed out that information about their cultural landscapes are included in their Treaty Settlements, such as in statements of association and statutory acknowledgements, and that this should inform where intensification occurs and how their values are included.

Impacts on Treaty Settlements

- Treaty Settlement redress land, Right of First Refusal (RFR) properties, areas contained within Statutory Acknowledgements, Deeds of Association, Overlay Classifications, and other important mechanisms will be affected by intensification
- There has not been sufficient consideration of constraints and opportunities for commercial redress and RFR land
- There has not been enough assessment of how intensification will affect the relationship of Māori with the areas identified in their Treaty settlements, including significant awa, maunga, ngahere and wāhi tapu.

Individual Groups' Responses

Written feedback has been received from the following groups:

- Ngaati Tamaoho

Mana Whenua Feedback

- Ngaati Te Ata
- Te Ākitai Waiohū
- Ngāti Whātua Ōrākei (not approved for public release)

Where this is approved for public release, these are included as Attachment C2_ Feedback from Mana Whenua on Replacement Plan Change.

11. Conclusion

While extensive engagement has been undertaken on PC78 and the natural hazard aspects of PC120, the Streamlined Planning Process has allowed insufficient time for Māori to be appropriately engaged on PC120 as a whole.

Not responding to the matters raised by mana whenua in this report means that PC120 risks being inconsistent with some aspects of the purpose and principles of the RMA. The main issue is that wide-ranging fundamental changes in anticipated residential height and density are proposed that could adversely effect the relationship between Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.

Only a fraction of mana whenua cultural heritage is currently protected, and none of the height controls and viewshafts for maunga extend south of Mangere, including the entire southern volcanic field.

While the new zoning can later be constrained by overlays and schedules, the revised expectations for development potential make future protection more challenging.

Furthermore, decisions about where intensification is supported have been made without consideration of opportunities and constraints for Treaty Settlement redress. This is particularly relevant when considering commercial redress could also provide additional housing capacity in Tāmaki.

Lastly, mana whenua have had very little time to consider how the draft plan change affects their interests within the Auckland Light Rail Corridor, which was not included in PC78. There has not been time to consider their contributions to relevant studies and plans, such as the Puketāpapa and Albert-Eden Area plans and the work done for Auckland Light Rail.

Attachment A – Plan Change 78 Māori Engagement Summary

Attachment A – Plan Change 78 – Mana Whenua and Mataawaka Engagement Summary¹

1.1 Overview

This section documents the engagement process undertaken with mana whenua² and mataawaka³ within the Auckland Region from the period of October 2021 until August 2022, prior to the IPI and associated plan changes being notified.

Council has specific consultation obligations with respect to Māori pursuant to clauses 3, 3B and 4A of Schedule 1 of the RMA. Clause 3B is prescriptive in what appropriate consultation with iwi authorities entails:

For the purposes of clause 3(1)(d), a local authority is to be treated as having consulted with iwi authorities in relation to those whose details are entered in the record kept under section 35A, if the local authority—

- (a) considers ways in which it may foster the development of their capacity to respond to an invitation to consult; and*
- (b) establishes and maintains processes to provide opportunities for those iwi authorities to consult it; and*
- (c) consults with those iwi authorities; and*
- (d) enables those iwi authorities to identify resource management issues of concern to them; and*
- (e) indicates how those issues have been or are to be addressed.*

Clause 4A goes on to stipulate that prior to notifying a proposed plan, a local authority must provide a copy of the relevant draft proposed plan to iwi authorities and have particular regard to any advice received. Adequate time and opportunity must be provided for iwi authorities to consider the draft and provide advice on it.

In addition to the above, recent legislation changes to the RMA introduced section 32(4A):

If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—

- (a) summarise all advice concerning the proposal received from iwi authorities under the*

¹ Proposed IPI Plan Change – Engagement and Consultation Summary Report

² Māori with ancestral rights to resources in Tāmaki Makaurau and responsibilities as kaitiaki over their tribal lands, waterways and other taonga. Mana Whenua are represented by iwi authorities.

³ Māori who live within Tāmaki Makaurau and are not within a Mana Whenua group

relevant provisions of Schedule 1; and
(b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.

Objective 5 and Policy 9 of the NPS-UD emphasise the existing requirements in the RMA to take into account the principles of the Treaty of Waitangi (te Tiriti o Waitangi or the Treaty) in urban development and ensure iwi/Māori are engaged in processes to prepare plans and strategies that shape urban environments. The provisions recognise the strong traditional, and continuing, associations iwi/Māori have with urban environments throughout Aotearoa.

Objective 5 requires councils to ensure planning decisions relating to urban environments take into account the Treaty.

Policy 9 sets out the minimum requirements for local authorities when taking into account the principles of the Treaty in relation to urban environments. This includes consulting with hapū and iwi in a way that is early, meaningful, and in accordance with tikanga Māori.

Local authorities must also take into account the values and aspirations of hapū and iwi for urban development, provide opportunities for hapū and iwi involvement in decision-making, and operate in a way that is consistent with iwi participation legislation.

Specific attention has been given to each of these matters in the development of the engagement process on the IPI and associated plan changes. The engagement process itself was developed in consultation with mana whenua representatives.

The legislative requirements of the IPI, which were significantly amended through the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, necessitated an intensive and targeted engagement programme with mana whenua and mataawaka over a period of 10 months.

Early discussions with mana whenua representatives identified an array of existing work programmes both within and outside of council which mana whenua are actively engaging on. An ambitious central government programme of legislative review including RMA reforms, Three Waters reform, the Emissions Reduction Plan, and the National Policy Statement on Freshwater Management has contributed to significant capacity demands being placed on iwi and hapū representatives.

This, in combination with what is a complex programme of work to implement the NPS-UD and MDRS and the changing legislative environment toward the end of 2021 had the potential to overwhelm the capacity of iwi mana whenua and mataawaka to meaningfully engage in the plan changes³.

An awareness of these existing capacity pressures, in addition to the constrained timeframes informed the engagement approach employed.

1.2 The engagement approach

The IPI and associated plan changes and variations presented a complex and interrelated work programme with significant strategic and policy implications. It is a regionally significant programme of work with wide-ranging implications for the urban environment.

Accordingly, engagement was facilitated with all 19⁴ mana whenua iwi authorities of Tāmaki

³ This refers to the IPI, complementary plan changes and plan variations.

⁴ This included both of the governance entities currently representing Ngāti Paoa iwi - the Ngāti Paoa Iwi Trust

Makaurau at both Governance and Kaitiaki Officer level since October 2021. Targeted engagement was also undertaken with mataawaka representatives.

The engagement goals were as follows:

- To understand, from a mātauranga Māori perspective the effect that intensification of the urban environment could have on matters of cultural significance to mana whenua in Tāmaki Makaurau. This included the potential effect of residential intensification on the boundaries of marae and other sites where Māori express their customs and traditions;
- To confirm the aspirations iwi and hapū have for the urban environment;
- To identify provisions within the Auckland Unitary Plan which require amendment to provide appropriate opportunities for Māori involvement in planning processes;
- To ensure mana whenua and mataawaka have an understanding of, and ability to engage on, the interrelated programmes of work associated with implementing the NPS-UD and MDRS;
- To educate mana whenua and Māori more generally on plan change process and points where they can be involved (as submitters);
- To foster positive and productive relationships with mana whenua and mataawaka entities at key points of the plan change preparation process; and,
- To ensure that mana whenua are supported to uphold their mana and exercise their customary kaitiaki role in relation to rauemi (resources).

1.3 Mana whenua engagement activity

Engagement has occurred through collective hui and also through individual hui with mana whenua representatives in accordance with their tikanga⁵.

Auckland's regional iwi governance forum, the Tāmaki Makaurau Mana Whenua Forum, has been engaged with, and has been kept informed throughout the development of the IPI. The Independent Māori Statutory Board has also been kept informed of process in accordance with their statutory role.

Where the IPI and plan changes are likely to affect the interests of co-governance entities such as the Tūpuna Maunga o Tāmaki Makaurau Authority, or co-management entities such as the Pukekiwiriki Pā Joint Management Committee, targeted engagement has been undertaken. This is discussed in the individual section 32 evaluation reports.

The approach has been to involve the mana whenua iwi authorities early in the development of the IPI, initially at a stage where both council and mana whenua representatives were developing their understanding of the legislation.

This has allowed iwi mana whenua representatives to understand the implications of the NPS-UD and MDRS at the same time as council officers. A side benefit of this approach is that it also puts mana whenua representatives in a stronger position to make submissions

and the Ngāti Paoa Trust Board.

⁵ Correct process

on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill in November 2021.

Mana whenua representatives have been involved through the evolutions of council staff thinking and before any drafting occurred, and as drafting has been undertaken.

Guidance was sought in the first two Governance and Kaitiaki hui as to the best approach. Advice was received that, given the compressed timeframes and widespread implications of the NPS-UD and MDRS, combined Governance and Kaitiaki hui was preferred to ensure communication was timely and consistent.

The engagement approach taken was an iterative one as outlined in Figure 1. Mana whenua representatives highlighted the importance of pre-circulating information, given the complexity and size of the subject material and this became a feature of the engagement. Detailed hui notes were sent to representatives from all mana whenua iwi authorities for the benefit of those that could not attend.

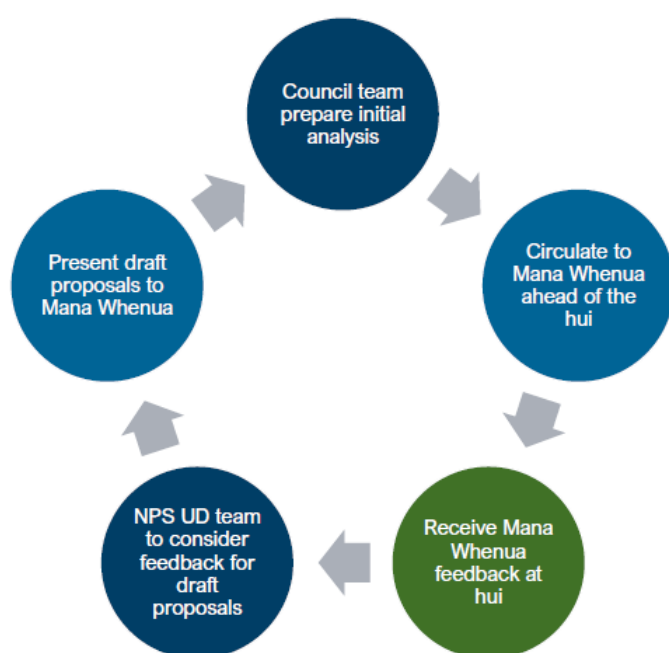


Figure 1: NPS-UD Iterative Engagement Approach

Related plan changes proposed at the same time, and in response to, the IPI were included in the engagement material to support mana whenua’s holistic understanding of the changes proposed across the plan. This became known as the NPS-UD Wheke illustrated in Figure 2.

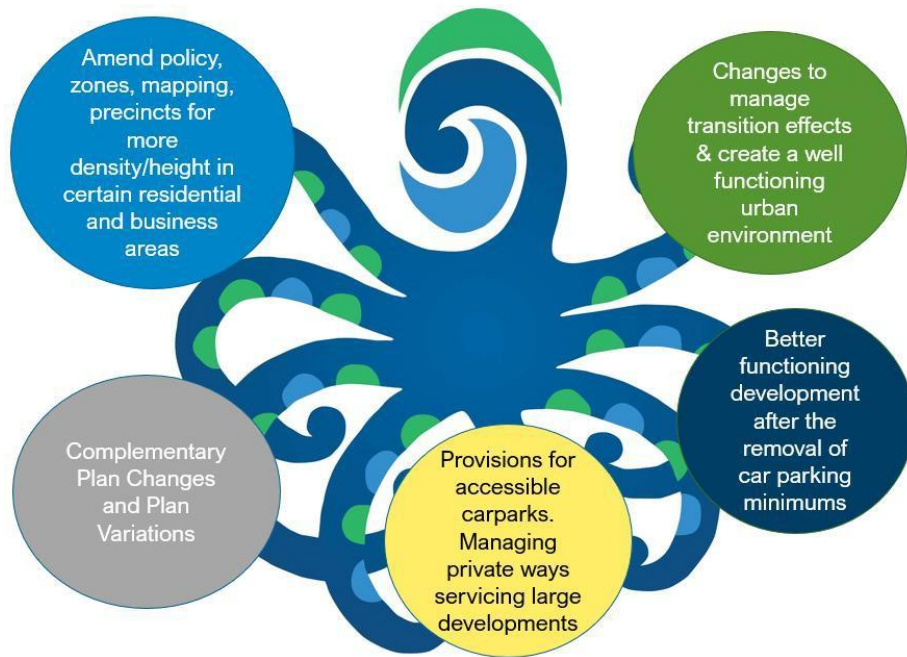


Figure 2: The NPS-UD Wheke

The engagement timeline and milestones are illustrated in Figure 3. It does not list individual hui held with ten mana whenua iwi authorities during this time which occurred at times convenient to the iwi representatives.

At key milestones in the project, such as the development of council's Preliminary Response (pre-notification public engagement) and at the draft plan change stage, mana whenua representatives were provided these documents in advance of material being finalised by council staff and being considered by the council's Planning Committee. This was to ensure advice could be meaningfully incorporated into the recommendations provided to the committee.

At the suggestion of the Independent Māori Statutory Board, an independent planning consultant was arranged to assist mana whenua representatives from April 2022 until the date the plan changes were notified in August 2022.

Since October 2021, there have been 11 collective hui and two days of facilitated specialist workshops with mana whenua representatives. These are summarised as follows:

- a. 27 October 2021: Introduction and whakawhanaungatanga – Governance and Kaitiaki level hui;
- b. 7 December 2021: Governance level hui – more detailed discussion of the mahi components (intensification and residential), resourcing and confirming mana whenua representatives interested in participating. At this hui it was suggested by mana whenua representatives that in recognition of the short timeframes, all future hui had combined governance and kaitiaki representatives;
- c. 16 December 2021: Kaitiaki level hui – representatives confirmed no opposition to having combined governance and kaitiaki hui from this date forward. Discussed technical matters of relevance to kaitiaki officers – qualifying matters, residential provisions, discussed information packs pre-circulated to representatives (kete) which were the council team's

initial thoughts, including the identification of iwi and hapū urban development values and aspirations;

- d. 22 February 2022 (2): Two hui were held this day. One focused on the Residential Zone aspects of the mahi and the second on the locations of the zoning itself (Intensification). Feedback provided to the council team over the holidays was discussed with representatives and further feedback was given to the council team. There was a particular focus on Sites and Places of Significance to Mana Whenua;
- e. 10 March 2022: A single hui discussing the council's 'Preliminary Position' (position for pre-notification public engagement) and responded to iwi feedback gathered so far, with further advice received from iwi representatives at hui in advance of being finalised for Planning Committee consideration;
- f. 19 May 2022: A hui to discuss the results of public feedback ahead of it being workshopped and presented to the Planning Committee. Iwi advice received and included in the reporting to the Planning Committee to inform their views;
- g. 8 and 9 June 2022: Two identical hui arranged to present the draft plan change, including how previous advice provided by mana whenua representatives has been addressed and given effect to into the draft plan change and to seek further advice on draft provisions up to 24 June (Matariki). Topics for facilitated workshops were agreed;
- h. 14 and 17 June 2022: Facilitated workshops with council staff on agreed topics;
- i. 11 and 17 August 2022: Two identical hui to provide feedback to mana whenua representatives on the notification version of the IPI in advance of the plan change being notified, including how previous advice provided by mana whenua representatives has been addressed in the plan change.

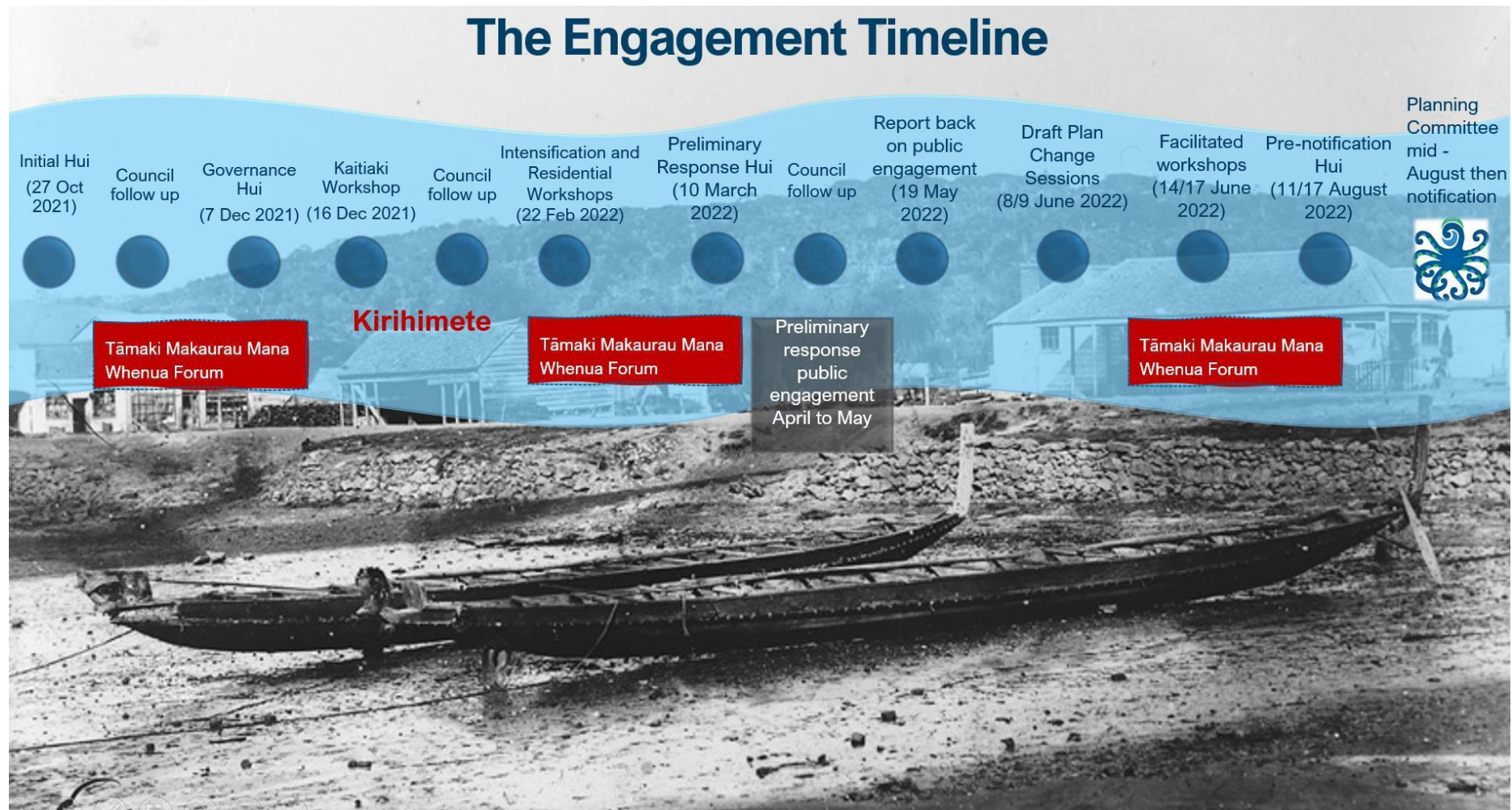


Figure 3: Mana Whenua Engagement Timeline

1.4 Mana whenua advice and council responses

Table 1 summarises the advice received by mana whenua iwi authorities and how the IPI responds to these matters. More detail of the advice and responses is included within the individual section 32 evaluation reports on the specific topics.

Plan Change 78 Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
Sites and Places of Significance to mana whenua – scheduled	Do not encourage development of scheduled urupā. Their tapu nature is not compatible with residential activities. Avoid effects on sites of significance such as surface flooding, blocking access, views, removal of vegetation, discharges. General agreement that already developed sites, such as those under existing buildings and roads can be intensified as required (city centre sites is an example).	A overlay response to scheduled urupā at risk of intensification is proposed in response to this feedback where these sites are affected by intensification. The Unitary Plan provisions addressing these other matters either remain intact in the Auckland-wide provisions or are addressed by other qualifying matters.

Sites and Places of Significance to Mana Whenua – unscheduled	Protect known but as yet unscheduled sites of cultural significance from intensification. Several sites have been identified as being of concern – Pararēkau Island (Pahurehure Inlet), views from Pukekiwiriki Pā (Papakura), Te Uru Tapu (Takapuna), Pukekohe Hill (Pukekohe), Te Maketu Pā, Karearea Pā, Tuihata Pā, Te Maunu a Tu. Schedule additional Sites and Places of Significance to Mana Whenua through the IPI.	At the outset, an assessment was undertaken on unscheduled sites of significance where council held information on these sites. This identified the current tranche of nominated Sites and Places of Significance to Mana Whenua (Tranche 2) contained a sufficient level of information to form an immediate planning response. These sites were discussed with the relevant mana whenua representatives and the result is the planning response proposed for Pararēkau Island (in the Hingaia Islands) and Pukekiwiriki/Pukekōiwiriki Pā. Mana whenua representatives were asked about specific sites. Advice from the representatives has progressively identified
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Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		several specific sites. A review of these sites identified that a number of them sat outside the urban area and were therefore unaffected by intensification. In other cases they were already prevented from intensification due to existing controls in the plan (Te Uru Tapu). In one instance, Pukekohe Hill, insufficient evidence exists on the site to progress a planning response at this time. It is also relevant to note that council is following legal advice that it is not possible to downzone properties from their current zoning through the application of Qualifying Matters. The legal interpretation is that while Qualifying Matters can be used to prevent further intensification, they cannot be used to remove development rights that currently existing under the operative plan. This is relevant to the wider extent of Pukekōiwiriki Pā raised by some iwi. The council position is that scheduling under existing overlays is not appropriate under the IPI due, in part, to a lack of appeal rights.
Historic Heritage Overlay	Feedback from Te Ahiwaru Trust Board requested the amendment of the category of three scheduled historic heritage places at Ihumātao to provide greater protection to these sites. They also request that urupā currently scheduled as Sites and Places of Significance to Mana Whenua be upgraded to Category A Historic Heritage Sites.	With respect to Ihumātao, it is not clear which places are referred to, as there are more than three scheduled places in the Ihumātao area. None of these historic heritage places are part of this plan change or the companion plan changes (PC81 and PC82 – additions and amendments to the Historic Heritage schedule). Council heritage staff will clarify this feedback with Te Ahiwaru Trust Board to understand their request, and any potential amendment as part of a future programme of work.

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		With respect to scheduled urupā, the council position is that scheduling additional sites under existing overlays is not appropriate through the IPI due, in part, to a lack of appeal rights.
Volcanic Viewshafts and Height Sensitive Areas	All iwi who have attended the engagement support their retention and recognise them as section 6(e) matters. Mana whenua representatives understand the added pressure the viewshafts through the city centre are under from development and support their retention. The ability to recognise the cultural landscape is very important. Some iwi have requested no development (exclusion zone) at the lowest contour of the maunga.	The recommended response is to retain all volcanic viewshafts at current locations and heights. Retaining all height sensitive areas in current locations. Proposing to introduce new density controls (coverage and landscape). No intensification of public open space is proposed in the IPI.
Waitakere Ranges Heritage Area	Support, particularly from Te Kawerau ā Maki, of retaining the existing protections and addressing boundary effects along the full length of the heritage area.	The Waitakere Ranges Heritage Area (WRHA) is its own Qualifying Matter and the IPI proposes changes to the zoning or overlay to protect this area. There is approximately 24km of boundary between the urban area and the WRHA. Approximately half of this will be provided some form of buffer protection through the situation of the Large Lot zoned land around Titirangi, open space zones along the length, some roads situated inside the boundary of the overlay, and 27 properties that are recommended to be zoned the new Low Density Residential Zone.

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		In addition there are approximately another 2kms of properties proposed to receive the new low density zone through other QMs – such as SEAs. Of the remaining length the subdivision patterns adjoining reflect the local legacy of protection – small lots with predominantly large single houses/homes on them. There is a single site of Large Lot zoned land within the walkable catchment for the Swanson Train Station that is also subject to the WRHA overlay. The recommendation is that this property retain its zone and that the NPS-UP provisions not apply. The property is subject to a separate subdivision plan as part of the Waitakere Ranges Heritage Area which acknowledges its location in proximity to the Swanson train station but also its relationship to the heritage area. The IPI position is that the anticipated intensification under NPS-UD is inappropriate for this property.
Significant Ecological Areas, Outstanding Natural Features, Outstanding Natural Landscapes, Outstanding Natural Character Areas, High Natural Character Areas, Ridgeline Protection Areas.	Support protection of these areas as important components of the cultural landscape. Seeking to avoid boundary effects on SEAs. Support the application of lower density zones to avoid degradation of these sites and features.	The application of a Low Density Residential Zone is proposed for residential properties containing Outstanding Natural Features, Outstanding Natural Landscapes, and High Natural Character sites. There are no Outstanding Natural Character areas within the urban environment. The overlay provisions for Ridgeline Protection Areas have been modified to address effects arising from more intensive development. Existing overlays and controls are maintained in the IPI response. With respect to Significant Ecological Areas, a Low Density Residential Zone is proposed for sites containing over 30% SEA coverage where the site is currently zoned Single House.

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		Where an SEA is located within a (new) Mixed Housing Urban or Terraced Housing and Apartment Building zone, additional building coverage rules apply. The purpose of these is to manage the extent of buildings and to provide for the protection and management of significant ecological areas.
Infrastructure	This has been raised as a significant concern by several mana whenua representatives. Concern about how water is managed and whether infrastructure will be able to cope with increased demand, including in more remote locations. A qualifying matter to address water and wastewater constraints is been supported by iwi mana whenua. Some concern has been raised about whether intensification in Auckland could place added demand on water takes from the Waikato River, thereby not giving effect to Te Ture Whaimana o Te Awa o Waikato (The Vision and Strategy for the Waikato River)	Not all areas of Tāmaki Makaurau are subject to the intensification required by the NPS-UD legislation. Areas with fewer than 5,000 people as a permanent population at the 2018 census are exempt, as are offshore islands (including Waiheke Island and Aotea/ Great Barrier Island). There are 92 rural and coastal settlements in the region, of which only four will have the MDRS applied. These four are: Waiuku, Pukekohe, Beachlands, and Warkworth. All other rural settlements such as Clevedon, Kawakawa Bay and Maraetai are exempt from the MDRS. Two qualifying matters are proposed to more strictly manage development in several areas where infrastructure capacity is limited. One addresses constraints in the combined wastewater network (stormwater/wastewater network). The second considers longer term water and wastewater network limitations that may arise due to intensification. With respect to Te Ture Whaimana o Te Awa o Waikato, a granted resource consent for taking water from Waikato River is subject to remaining within relevant flow limits, and

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		Watercare currently investigating alternative long-term water supply sources e.g. recycled potable water and desalination plants. Watercare has engaged directly with Waikato-Tainui on these matters.
Stormwater and flooding	The appropriate management of water through the proper treatment of stormwater and avoidance of flooding areas has been raised as a matter of concern. Ensuring that intensification will not worsen adverse stormwater runoff effects.	The IPI contains qualifying matters for areas where there are stormwater infrastructure related constraints. This includes areas that connect into the combined stormwater network where there is a capacity issue, where a connection to the public stormwater line is not available, and where ground soakage is poor. In addition to the stormwater qualifying matter and relying on existing Unitary Plan provisions, council are also proposing to apply the Low Density Residential Zone in some cases. The Low Density Residential Zone is proposed to apply to existing Single House zoned sites that do not meet criteria identified by Healthy Waters – they either cannot achieve a suitable building platform outside of the floodplain, and/or cannot achieve safe egress during a flood event.
Coastal Areas	Some mana whenua representatives have expressed concern about development occurring in the coastal environment. Concern about degrading the coastal character, increased erosion, sea-level rise, and encountering Māori artefacts have been cited as reasons for concern.	The recommended approach is to rezone all residential properties affected by coastal hazards to the Low Density Residential Zone and apply a height variation control over the non-residential properties currently subject to intensification (those within walkable catchments and other locations required to intensify). As the council position is that the IPI is unable to apply density and height standards below the current AUP standards, some

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		residential properties will be addressed as part of a coastal hazards plan change which is planned for 2023. In addition to the above, the Auckland-wide standards and the Accidental Discovery Rule are proposed to be retained to protect these sensitive areas.
Walkable catchments	Concern about accessibility, equity and well-being - that many people, including Māori, will not be able to walk the distances used for walkable catchments e.g. less able bodied people, large families with lots of kids and multiple jobs etc (will not get the benefits, rather will be disadvantaged). This is related to transport and a lack of parking and congestion making accessibility difficult.	The walkable catchments has been based on an 'average' of what people will walk. Some athletic people could walk a lot further than 800m for a train station, while others with limited mobility would struggle with under half of that. The distance has therefore been set as a mid-range.
Transport	Transport and a lack of on-site parking has been raised as a concern on several occasions by mana whenua representatives. Concerns have also been raised on the Auckland Draft Parking Strategy which is currently being consulted on by AT. An overall increase in congestion and diminished ability for whānau to move around are issues. The mandatory removal of on-site carparking requirements in the Unitary Plan required by the NPS-UD without any ability for mana whenua representatives to change the outcome has been met with disappointment from a Treaty partnership perspective.	The NPS-UD legislation removed any discretion for council with respect to the removal of on-site parking. The complementary Transport Plan Change includes some matters to relieve the concerns of mana whenua. These include a requirement for accessible parking and additional on-site loading spaces which can be used as pick-up and drop-off points for residents requiring this vehicle access. There are also improvements to private accessways to enhance pedestrian safety. To note, a council identified qualifying matter is proposed to be included in the IPI for the Beachlands location. The QM seeks to more strictly manage development in an area where significant

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
	Related to the comments on walkable catchments, not having on-site parking limits opportunities for larger whānau and those with restricted mobility.	transport infrastructure constraints will not be able to be addressed in the next 10 years. Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula with limited employment opportunities and education and communities services. Although there are ferry and bus options these are limited and infrequent with capacity constraints. There is only one road connection to the wider regional destinations to the west and has limited capacity to accommodate additional traffic. Significant investment would be required to upgrade the road and the surrounding rural roading network.
Māori design principles in an intensifying city	Quite early on, some mana whenua representatives raised a desire to see Māori design principles being used to integrate mātauranga and tikanga into the design of new buildings.	The requirement for city centre developments to go through the Urban Design Panel is proposed to be retained. It is through this process that the Te Aranga Design Principles (and eventually the <i>Ngā Iwi Mana Whenua o Tāmaki Makaurau Design Principles</i>) are applied.
Culturally Sensitive Precincts	Māngere Gateway Sub-Precinct E (Ihumātao site) has been raised as being of particular concern to Te Ahiwaru Waiohū. They have sought a low density zoning over that site.	Each precinct has had its own individual assessment. Where these precincts recognise and protect Māori cultural values, those aspects are being treated as Qualifying Matters and those protections are proposed to be retained. In the case of Ihumātao, this is Crown owned land. A Kīngitanga led group, Te Roopu Whakahere, are currently considering the future of this site. This group consists of iwi representatives, Crown representatives and a Kīngitanga representative. The future of the site for housing purposes is an option being considered.

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		Māngere Gateway Sub-precinct E is also a Special Housing Area (SHA) precinct. In response to legal advice, no SHA precincts are being amended, so the current precinct provisions and zoning are proposed to remain.
Small lots and on site mitigation	Some iwi representatives have raised concern that smaller lots presents less opportunity to undertake on-site mitigation. This is related to concerns about cross-boundary effects and the capacity of infrastructure to manage discharges.	The MDRS does not allow for minimum lot sizes provided a new development can meet the density standards. The application of Qualifying Matters will assist in managing significant cross-boundary effects. Beyond this, Council proposes to retain Auckland-wide and overlay controls and is also proposing to retain maximum impervious area controls within the new zones.
Non-residential land	Two iwi have an interest in the rezoning of non-residential land in response to Treaty arrangements with the Crown.	According to legal advice, the rezoning of non-residential to residential land is not within the scope of the IPI.
Open Space	Open space must be retained as it is important for the health and wellbeing of people in an intensifying city. Many scheduled sites of significance are on open space sites and must be protected. An ability to access the coast, rivers and other sites to undertake customary activities is important.	Public open space is to be retained and controls put in place to maintain the quality of that space (such as controls to maintain sunlight access).

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
Special Purpose – Māori Purpose Zone	One iwi has expressed concern that the NPS-UD may encourage inappropriate development on privately owned sites within the Māori Purpose Zone. Concern raised that intensification next to one MSPZ site would result in reverse sensitivity effects during culturally sensitive activities (such as tangihanga)	The Māori Purpose Zone is not proposed to be amended through the IPI as it is not within walkable catchments or considered to be a relevant residential zone. All the existing policies and controls to ensure these areas are sustainably developed and used in accordance with mātauranga and tikanga Māori remain intact. The site of potential reverse sensitivity is not in an area where the surrounding land will be intensified under the NPS-UD or MDRS.
Papakāinga	No concern has been expressed regarding an ability to develop papakāinga under the intensified residential zones. A matter was raised about inappropriate development adjacent to papakāinga in the Māori Special Purpose Zone as discussed earlier.	The changes proposed by council staff will not change any of the Māori Land, Treaty Settlement Land or Māori Special Purpose Zone provisions. Papakāinga on these sites therefore remain enabled in a manner which allows flexibility for iwi/hapū to develop the housing in accordance with their tikanga. In general residential zones in the urban environment, engagement with mana whenua and matawaaka, and council's Māori housing team has not identified the existing residential standards are an issue. The proposed zones under the NPS-UD and MDRS are more permissive in enabling density and height than they are currently, something that provides greater design flexibility for communal types of housing. The proposed zones contain an option of Integrated Residential Development and Marae developments.

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
Accidental Discovery Rule	Some iwi representatives have raised concerns that the existing accidental discovery rules contained in various sections of the Unitary Plan will not effectively manage discoveries in the face of widespread intensification and development.	This rule is both a regional and district rule. It operates at the interface of both the Resource Management Act 1991 and the Heritage New Zealand Pouhere Taonga Act 2014. Efficiency and effectiveness monitoring is being undertaken on the performance of this rule in advance of the development of the next Unitary Plan. The rule does not directly implement or suppress intensification and is more appropriately addressed as a separate plan change or as part of the next proposed Unitary Plan.
Special Character	This has been of passing interest to mana whenua representatives although some feedback received was positive of enabling more housing in some special character areas closer to the city centre.	In response to the NPS-UD and MDRS, council staff have undertaken site-specific analyses of all properties in the Special Character Areas Overlay – both in Business and Residential zones. Individual site data was compiled and analysed to arrive at an area-based recommendation for each overlay area. Recommendations are detailed in a findings report for each overlay area. For special character residential, the recommendation was reached based on a numeric threshold. Within walkable catchments, areas needed to have at least 75% of properties strongly contributing to the character qualities of the area. Outside of walkable catchments, the threshold was 66% of properties strongly contributing. Where areas do not meet the threshold as a whole, smaller sub-areas may be identified. For special character business, the recommendation was reached based on a qualitative threshold. Individual properties were assessed and found to be character-defining, character supporting, neutral or detracting. An area-based determination

Topic	He kōrero me ngā whakaaro o Mana Whenua The discussion and thoughts of Mana Whenua	He whakautu The response
		of value was made based on the overall quality of the character of each area. The findings, which are based on special character values only, show that the majority (around 75%) of special character has retained its value, and has been proposed to be identified as a qualifying matter. There are some changes proposed to the extents of areas where they have been found to no longer have sufficient special character values. Some of the areas where the overlay is proposed to be retained include: Grey Lynn, Ponsonby, Devonport, Manurewa and Ōtāhuhu. These areas have retained their special character quality. Some of the areas where the extent of the overlay is proposed to be reduced include: Remuera, Birkenhead, Ellerslie Town Centre, Ōrakei and Papatoetoe. The character quality of these areas has eroded over time.

Table 1: Iwi Authority Advice and IPI Responses

1.5 Mataawaka overview

The council team, in consultation with Council's Māori Outcomes directorate, Ngā Mātārae, developed a targeted engagement approach for mataawaka.

One area of potential risk identified was the extent to which intensification on the boundaries of marae and other culturally important centres may affect their ability to be used for customary practices.

Eight mataawaka and taurahere marae were identified that may be affected by residential intensification on their boundaries.

Using the relationships and contacts of a Ngā Mātārae Kaitohutohu Marae / Marae Advisor, the council team made contact with all of these marae representatives. Individual hui were held with those representatives who sought further discussion and information. No widespread potential issue justifying a policy response was identified.

In addition, the team met with co-chair of Te Kotahi ā Tāmaki Marae Collective. This collective has 26 formal member marae and outreach to over 70 in the wider region. They have supported the educating and raising awareness across marae by providing communications and advisory support to their marae whanau via Facebook and communications.

The Waipareria Trust and Manukau Urban Māori Authority (MUMA) were approached by the council team for their perspectives representing mataawaka more generally within the region.

While no response was received from the Waipareria Trust, discussions were held with the CEO of MUMA. MUMA works closely with the Waipareria Trust on housing issues.

Concerns raised reflect those of mana whenua regarding the provision of open space and appropriate facilities in an intensifying environment, and how effective the NPS-UD would be in creating quality higher density developments.

Similar to the views of iwi mana whenua, the provision of papakāinga in the Auckland urban area is not seen as an issue as Māori don't own residential land of a suitable size and ownership structure (i.e. collective ownership) to consider developing papakāinga.

2. Conclusion

The identification, development and delivery of the approach to pre-notification consultation and engagement on the council's response to the NPS-UD 2020 and RMA amendments of late 2021 has been undertaken in a compressed and constrained environment.

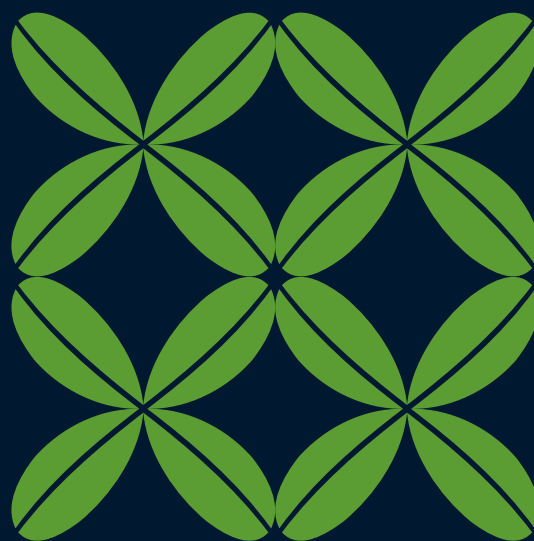
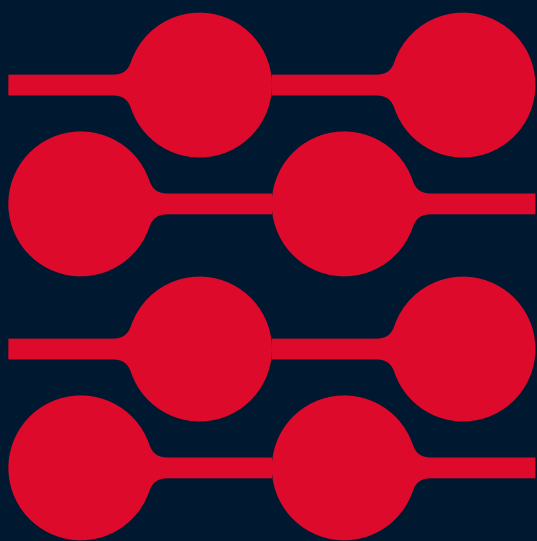
The council wanted to engage and consult with Aucklanders, stakeholders, mana whenua and mataawaka on these important matters to fulfil obligations and also for reasons of best practice, acknowledging what was possible in terms of time and resource limitations.

The council believed it was important to inform people about the changes, put forward initial proposals as a preliminary response, and highlight what was available for council decision-making within a framework that was mostly a government requirement. This would be informed by feedback and input from a range of individuals, groups, iwi, organisations and bodies who had an interest in or responsibility for Auckland and its future development, improvement and protection.

The resulting proposed plan changes that have been produced for public notification in August 2022 have been shaped and informed, where possible, by the input and feedback of many. The adoption of an approach that went beyond what was required, in a statutory sense, has been considered essential to bringing the people of Auckland along on the journey of preparing the response to the NPS-UD and RMA amendments, in the form of proposed plan changes to the AUP, into an Auckland context.

Attachment B – Mana Whenua Engagement Summary Report: Risk Tolerance and Scenario Testing Wānanga [October – November 2024]

Auckland Unitary Plan : PCXX Natural Hazards



Mana whenua Engagement Summary Report

Risk Tolerance and Scenario
Testing Wānanga [October –
November 2024]

November 2024, Version 0.2
– Final



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This report has been prepared as draft for mana whenua review.

Whakarāpopotanga matua

Executive summary

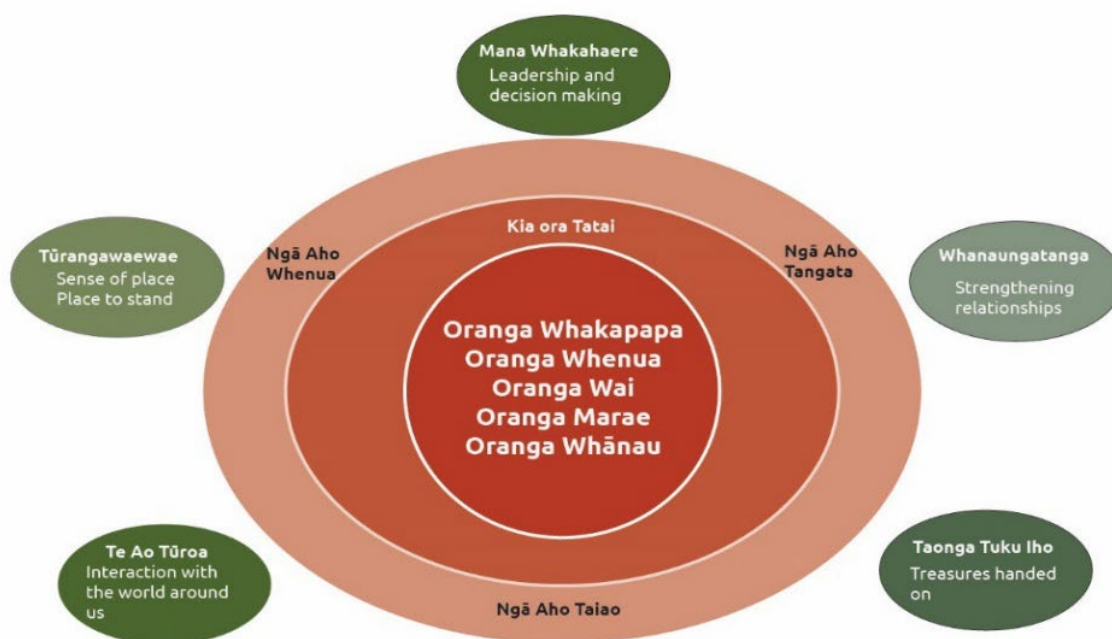
This report provides a summary of the key themes from feedback received from mana whenua kaitiaki through the October / November 2024 Natural Hazards Plan Change risk tolerance and scenario testing wānanga.

Seventeen of the nineteen iwi authorities participated in one or more of the wānanga. Further engagement is still required with mana whenua iwi authorities at a governance level and with marae haukāinga who are directly affected. This engagement is underway and will be reported on in early 2025.

Te Ora ō Tāmaki Makaurau is the well-being framework developed by the Mana whenua Kaitiaki Forum in response to Te Tāruke-ā-Tāwhiri.

The five elements of the Te Ora ō Tāmaki Makaurau Wellbeing Framework have helped to frame the key themes we have heard from Mana whenua through the engagement process.

Te Ora ō Tāmaki Makaurau Wellbeing Framework



Key themes :

1. Mana Whakahaere : Leadership and decision making

- The AUP chapter B6. Issues of significance to mana whenua has a gap and needs to be updated in relation to natural hazards.
- The Plan needs to recognise the individual interests and values of each iwi / hapū entity, and that they will have different tikanga and kawa in relation to how they choose to respond to the effects of natural hazards

- c. Recognition of the mana motuhake of the role that mana whenua often play in supporting emergency and recovery efforts. Providing greater opportunities in the plan for mana whenua to support recovery efforts and emergency works, through RMA s33 transfers of powers for certain functions such as monitoring emergency works or administering accidental discovery protocols.
- d. The importance of taking a precautionary approach to decision making in areas where there is insufficient information.
- e. Providing greater access to information and technical expertise to help mana whenua make informed decisions.
- f. The importance of equity in our planning response. Recognising that Māori are disproportionately affected by natural hazards than others due to socio-economic factors and may have a lower tolerance to risk.

2. Whanaungatanga : Strengthening relationships

- a. Recognising the importance of engaging with mana whenua at the appropriate levels on governance vs operational matters.
- b. Recognition of the role of haukāinga in understanding the direct impacts of natural hazards in areas of high Māori values to inform plan development.
- c. The importance of taking an integrated approach to engagement with mana whenua.

3. Taonga Tuku Iho : Treasures handed on

- a. Greater recognition of sites and places of significance to mana whenua both scheduled and unscheduled in the plan.
- b. The importance of upholding the outcomes of treaty settlements in the plan.
- c. Recognition of the cultural values and unique constraints of Māori land and Treaty Settlement land in relation to the natural hazards response.

4. Te Ao Tūroa : Interaction with the world around us

- a. Greater use of mātauranga Māori and cultural indicators in the management of natural hazards in the plan.
- b. The importance of understanding the impacts of historic decision making that have exacerbated the effects of natural hazards on sites and places of significance to mana whenua (unscheduled and scheduled).
- c. Greater awareness is needed of the risks to people and communities in how we plan for areas of future intensification and infrastructure provision.
- d. The cumulative effects of resource decision making on effects of natural hazard need to be better understood.
- e. Greater control over the water takes from natural aquifers which could be a valuable resource in times of drought or in response to wildfires in isolated areas.
- f. Understanding the impacts of land stability on the ngāhere and taonga species such as kauri as a result of development in natural hazard areas.

- g. Design of existing and future public infrastructure needs to be future-proofed to mitigate / avoid natural hazard risks.
- h. Elevating the importance of regeneration of natural systems (streams / overland flowpaths) to mitigate / avoid natural hazard risks.

5. Tūrangawaewae : Sense of place to stand

- a. The importance of understanding the historic associations of mana whenua and cultural landscapes in land use planning.

1. Te take mō te pūrongo

Purpose of this report

The purpose of this report is to summarise and report the feedback received from mana whenua kaitiaki representative through the Natural Hazards Plan Change risk tolerance and scenario testing.

Wānanga were held on the following dates:

- Wānanga tuatahi – Technical wānanga – Introduction to natural hazards plan change (18, 21, 30 October 2024)
- Wānanga tuarua – Technical wānanga – Natural hazards scenario testing (1, 5, 7 November 2024)
- Wānanga tuatoru – Feedback session - Ngā whakautua o ngā hui o runga (22 November 2024)

Wānanga tuatahi and tuarua were offered online and in-person on three separate dates to enable mana whenua the option to attend at their convenience. Information was pre-circulated prior to the sessions.

Wānanga tuatoru was a single online wānanga to report back the feedback received to date as the Consultation Summary Report was being finalised. At the final wānanga mana whenua were invited to access the Natural Hazards Consultation Viewer and the opportunity for their own mātauranga-ā-iwi to be applied to better inform council's understanding of land instability.

The intent of the wānanga was not to capture individual views, rather to encourage free and frank kōrero with mana whenua kaitiaki on the regionally significant issues / risks of natural hazards.

The common themes have been summarised through this report to support the report back to the 11 December 2024 Policy and Planning Committee workshop on risk tolerance.

A copy of the wānanga presentations can be found in **Attachment A**.

Acknowledgements

Auckland Council – Planning and Resource Consents Department would like to acknowledge the contribution of the following mana whenua representatives that have contributed to this engagement:

Wānanga tuatahi – Technical wānanga – Introduction to natural hazards plan change (18, 21, 30 October 2024)

1. Te Kawerau ā Maki (Kahurangi Raharuhi)
2. Ngāti Manuhiri (Helayna Tane)
3. Ngāti Whātua o Kaipara (Julia Steenson)
4. Ngāti Rehua (Char Ngawaka)
5. Te Ākitai Waiohū (Karen Wilson)
6. Ngāti Tamaoho (Lucie Rutherford, Edith Tuhimata)
7. Te Runanga o Ngāti Whātua (Tracy Walters)
8. Waikato Tainui (Lorraine Dixon)
9. Te Patukirikiri (Paulette Reidy)
10. Ngāti Paoa (Tipa Compain)
11. Ngai Tai ki Tāmaki (Revell Butler)
12. Ngāti Tamaterā (Michelle Wilson, Eddie Manukau)
13. Ngāti Maru (Craig Solomon)

14. Te Uri o Hau (Fiona Kemp, Cindy Hemsall, Sam Kemp)
15. Te Āhiwaru Waiohua (Kowhai Olsen)

Wānanga tuarua – Technical wānanga – Natural hazards scenario testing (1, 5, 7 November 2024)

1. Te Ākitai Waiohua (Karen Wilson)
2. Ngāti Tamaoho (Lucie Rutherford)
3. Te Runanga o Ngāti Whātua (Tracy Walters)
4. Waikato Tainui (Lorraine Dixon)
5. Te Patukirikiri (Paulette Reidy)
6. Ngāti Paoa (Tipa Compain)
7. Ngai Tai ki Tāmaki (Revell Butler)
8. Ngāti Tamaterā (Eddie Manukau)
9. Ngāti Maru (Craig Solomon, Geoff Cook)
10. Te Uri o Hau (Fiona Kemp)
11. Te Āhiwaru Waiohua (Kowhai Olsen)

Wānanga tuatoru – Ngā whakautua o ngā hui o runga (22 November 2024)

- Ngāti Paoa (Tipa Compain)
- Ngaati Whanaunga (Mike Baker)
- Ngāti Tamaoho (Lucie Rutherford)
- Ngāti Rehua (Char Ngawaka)
- Te Āhiwaru Waiohua (Kowhai Olsen)
- Waikato Tainui (Lorraine Dixon)
- Ngāti Tamaterā (Kahurangi – standing in for Michelle Wilson)

Individual hui were held with the following groups who missed some or all of the workshops:

- Te Ākitai Waiohua (Karen Wilson)
- Ngāti Whātua Ōrākei (Phil Wihongi)

The following mana whenua groups were also invited but chose not to engage in the workshops. We will continue to identify and offer opportunities to engage with these groups through on-going engagement as the plan change progresses:

- Ngaati Te Ata Waiohua
- Ngatiwai¹

A full list of attendees at each wānanga can be found in **Attachment B**.

Further engagement required:

The scope of the engagement summarised in this report has focussed on kaitiaki (operational representatives) of iwi authorities.

We recognise that each group has their own individual interests and values that may be impacted by the NHPC and further individual hui are planned with the 19 iwi authorities between December 2024 and

¹ Ngātiwai have been involved in individual hui but did not attend these sessions. (They are aware the plan change does not cover the Hauraki Gulf Islands).

February 2025. This will be reported on separately and may result in further clarification on the regionally significant issues and risks.

We recognise that in addition a number of mana whenua marae are directly impacted by the effects of natural hazards. In order to better understand the issues / risks a separate engagement process is underway with affected marae. This will be reported on separately.

From the engagement it was noted that separate engagement is required with the following groups:

- Iwi governance / Post settlement governance entities
- Haukāinga / Māori landowners / Marae
- Mataawaka / Māori organisations – this will be captured through the general engagement process.

This engagement will be progressed as part of the next phase of work and reported on separately.

2. Horopaki

Context

2.1 Background

Council's Planning, Environment and Parks (PEP) Committee passed a resolution on 9 February 2023 (PEPCC/2023/6) for staff to prepare a scope of works to investigate the regional and localised impacts of flooding, and the implications for land use planning, regulatory, current plan changes to the AUP (notably PC78), infrastructure and other policy settings. A scope of works to investigate impacts, implications and improvements was then approved by a delegated group of the PEP Committee and noted at the 2 March 2023 committee meeting (PEPCC/2023/25).

Strengthening the AUP has been identified as a key opportunity to improve the current regulatory and non-regulatory settings in relation to the management of natural hazard risk. The PEP Committee passed a resolution to endorse the preparation of changes to strengthen the AUP on 29 June 2023 (PEPCC/2023/82). This forms the basis of the Natural Hazards Plan change project.

In terms of engagement and consultation on the variation and plan change the PEP Committee 29 June 2023 made the following resolution:

“d) request staff prepare an engagement plan in collaboration with the Recovery Office to be agreed by the Chair and Deputy Chair of the Planning, Environment and Parks Committee and a member of the Independent Māori Statutory Board.”

At a subsequent workshop on 30 August 2023, the PEP Committee indicated a strong preference for an 'enhanced' approach to engagement on these matters, noting the need to deliver what is possible within legislative and time constraints. This included acknowledgement of an allocation budget to successfully deliver the engagement plan.

Council's Planning, Environment and Parks (PEP) Committee passed a resolution at the 11 April 2024 committee meeting (PEPCC/2024/24²) to seek an extension of time from the Minister for Resource Management Reform to enable the council to integrate the following matters in the Auckland Unitary Plan Change 78:

- i) Auckland Light Rail Corridor (that was excluded from PC78 on notification);
- ii) Strengthened provisions relating to natural hazards
- iii) Extent of incorporation of Medium Density Residential Standards into all relevant residential zones (subject to the government amending legislation as announced)
- iv) Remaining parts of policies 3 and 4 of the National Policy Statement on Urban Development.

The Minister for the Environment on 22 April 2024, issued a Gazette Notice 2024-sl1708³ to an extension to 31 March 2026 to notify decisions on the independent hearing panel's recommendations on PC 78.

² [pc78-ccom-min-dir-2024-05-23.pdf](#)

³ <https://gazette.govt.nz/notice/id/2024-sl1708>

The Gazette Notice 2024-s11708 requires Auckland Council to:

- a. Notify a plan change, or similar, to address the management of significant risks from natural hazards by 30 April 2025.
- b. Enable intensification within the Auckland Light Rail corridor, and ensure intensification is enabled in appropriate areas by 30 April 2025.
- c. Continue to progress the parts of the Plan Change 78 subject to Policy 3 and Policy 4 of the National Policy Statement on Urban Development where practicable given the expectations outlined in (5)(a) and (5)(b) above.
- d. Prior to notifying plan changes or similar, on natural hazards, and to implement the National Policy Statement on Urban Development and the Medium Density Residential Standards in the Auckland Light Rail corridor, notify the Minister responsible for RMA Reform on the impacts on Auckland's development capacity.

2.2 Related Council Workstreams

This project is one of several across council directorates which are addressing the impact of climate change and natural hazards within Tāmaki Makaurau. Many of these programmes are already working with Māori in some capacity. Work is ongoing to collaborate with these other programmes to enable efficient and effective engagement for Māori.

The Natural Hazards Plan change Project Engagement Plan identifies several council departments as internal stakeholders, as they may be interested in or may be impacted by the decisions made on the NHPC.

With respect to kaupapa Māori, the following council departments and units are currently working with Māori as part of natural hazard related work and are providing technical support to this engagement:

- Recovery Office – Tāmaki Makaurau Recovery Plan actions including property buyouts and identifying flood affected land,
- Planning and Resource Consents – Open Space Rezoning Plan change, Plan Changes to the four northern and southern Future Urban Zone locations, National Policy Statement Freshwater Management Plan Change preparation, with a sub-set of stormwater sensitive design.⁴,
- Resilience and Infrastructure, Healthy Waters and Flood Resilience – Making Space For Water,
- Environmental Services – Community Climate Action – Marae Resilience Initiatives,
- Resilient Land and Coasts – Shoreline Adaption Plans. Natural Hazard Management Action Plans. Māori Outcomes Strategic Goals Fund,
- Policy – Marae-led adaption planning,
- Community Office – Marae relationships,
- Ngā Mātārae – Māori Strategic Relationships and Partnerships – Mārae Infrastructure Programme, Cultural Initiatives Fund, Māori Housing Unit, and
- Auckland Emergency Management – Local Board Emergency Preparedness Response Plans, Marae Preparedness Plans. Training and education.

⁴ This plan change is currently considering the application of the Māori Purpose Zone to two open space sites for marae purposes

3. Korahi

Scope

The regional nature of the Natural Hazards Plan Change (NHPC) means that it is likely all mana whenua entities and most matawaaka marae trusts, urban Māori authorities, Māori property owners, and possibly Māori business owners will be interested in how changes to the natural hazard provisions of the AUP might affect their interests.

Proposed changes to the AUP are likely to affect the mapped extent of natural hazards, the policy approach, and the rules and standards that regulate land use and development on sites affected by hazards.

The focus of this engagement is with mana whenua and marae haukāinga.

Natural Hazards Plan change		Status
Mana whenua – kaitiaki (Schedule 1 engagement with iwi authorities)	Under schedule 1, clause 3B of the Resource Management Act 1991, Auckland Council has statutory obligations to engage with, and consider ways to foster development of capacity, and processes to enable iwi authorities to identify resource management issues of concern to them; and indicate how those issues have been or are to be addressed. In addition, under schedule 1, clause 4A, Auckland Council must provide a copy of the draft proposed policy statement or plan to the iwi authorities consulted under clause 3(1)(d) and have regard to any advice received from those iwi authorities. Adequate time and opportunity must be provided for the iwi authorities to consider the draft and provide advice on it. The purpose of this engagement is to work collaboratively with the 19 mana whenua iwi authorities at a kaitiaki (operational) level through a series of wānanga to identify, quantify and evaluate opportunities and issues associated with policy responses to natural hazard risk. This includes (but is not limited to) how the plan responds to Part 2 RMA matters including managing the effects of natural hazards on mana whenua values associated with issues of significance to mana whenua, management of natural and physical resources, Māori land, Māori cultural heritage, traditions and practices. A second purpose is to raise awareness of the issues/risks and provide early meaningful input from mana whenua into the draft plan change and inform the policy response.	On-going (Oct / Nov 2024: Risk tolerance wānanga completed and will be reported to a workshop of the 11 December 2024 Policy and Planning Committee.)

Natural Hazards Plan change		Status
	The plan change team will seek to engage with all 19 mana whenua entities listed below. Where existing forums operate addressing natural hazard risk with mana whenua, efforts will be made to collaborate to provide cohesive council messaging. 1. Te Rūnanga o Ngāti Whātua 2. Ngāti Whātua ki Kaipara 3. Ngāti Whātua Ōrākei 4. Te Kawerau ā Maki 5. Ngāi Tai ki Tāmaki 6. Ngāti Tamaoho 7. Te Ākitai Waiohū 8. Ngāti Te Ata Waiohū 9. Te Ahiwaru 10. Ngāti Paoa 11. Ngāti Whanaunga 12. Ngāti Maru 13. Ngāti Tamaterā 14. Te Patukirikiri 15. Waikato – Tainui 16. Ngātiwai 17. Ngāti Rehua 18. Ngāti Manuhiri 19. Te Uri o Hau	
Mana whenua - governance (Targeted engagement).	The purpose of this engagement is to better understand the individual interests and values of each group and how these might be impacted by the NHP. Mana whenua kaitiaki have told us that we must speak to their governance on issues of significance to mana whenua including their treaty settlements. Auckland Council acknowledges that many groups are still at varying stages of their treaty negotiations or are yet to begin. Upholding the outcomes of treaty settlement legislation and signed deeds of settlement between iwi and the crown is an important consideration. A te tiriti / treaty settlement is an agreement between the crown and a Māori claimant group's historical claims against the crown. Claimant groups are usually iwi or large hapū (tribes and sub-tribes) that have a long standing historical and cultural association with a particular area. As of 25 November 2024, within Tāmaki Makaurau, nine pieces of treaty settlement legislation had been passed, with four signed deeds of settlement pending legislation. Five individual and / or collective entities were in the early phases of the process. Refer to	Not started (Dec 2024 – Feb 2025)

Natural Hazards Plan change		Status
	Attachment C for the status of Individual and collective settlements within Tāmaki Makaurau as at 25 November 2024. Treaty settlement documents can be found online at: Te Arawhiti - Find a Treaty settlement In order to support our engagement with PSGEs we have mapped the individual treaty settlements – deed of settlements in the Natural Hazards Consultation Viewer. This closed access viewer helps each group understand the impact of the Natural Hazards Plan Change on their individual treaty settlements and areas that are still subject to negotiation. All groups that have treaty settlement legislation have been mapped. Groups who are at signed deed of settlement stage pending legislation will be added to the Natural Hazards Consultation Viewer at their request. Findings from engagement will be summarised separately, and may contain sensitive information.	
Marae haukāinga (Targeted engagement with potentially affected marae and Māori land owners)	Iwi authorities have told us that they do not speak for individual marae, who have their own management structures and are usually administered by a trust. Marae exert their own mana motuhake over decisions that impact their use of their land and the way the marae operates. Eight marae have been selected that represent a cross-section of those most affected by natural hazards within the region. Many are located on Māori land administered under Te Ture Whenua Māori Land Act 1983, which presents a number of challenges for managed retreat. Marae haukāinga are considered affected parties in this process, some of which have additional rights and interests where they are located on Māori land administered under Te Ture Whenua Māori Land Act 1983. The purpose of the engagement is to raise awareness of the issues/risks of natural hazards in relation to the directly affected marae with the marae haukāinga to develop a series of case studies that highlight the issues / risks and provide early meaningful impact from directly affected marae to inform the potential policy response. The second purpose of the engagement is to support marae to understand the proposed plan change process so that they are able to participate through submissions once the plan change is notified, and to connect them with other parts of Auckland Council who can provide broader support through their programmes e.g., Customer and Community Services – Marae	On-going (Nov 2024 – Dec 2024)

Natural Hazards Plan change		Status
	relationships, Auckland Emergency Management – Marae Preparedness Plans, Ngā Mātārae - Marae Infrastructure Programme, Community and Social Policy – Marae led adaptation planning. The following marae have been engaged in the process to date: • Umupuia Marae • Whaataapaka Marae • Pukaki Marae • Makaurau Marae • Te Henga Marae Discussions are pending with the remaining three marae: • Omaha Marae • Kia Ora Marae • Puatahi Marae We will continue to provide opportunities to engage with groups as the NHPC progresses. Findings from engagement will be summarised separately, and may contain sensitive information.	

3.1 Out of scope

Engagement with mataawaka and Māori organisations will be reported on separately through the wider community engagement process.

Natural Hazards Plan change		Status
Mataawaka (Participatory forum)	In parallel with the mana whenua engagement process. Auckland Council undertook targeted engagement with the general public through a participatory forum which followed a deliberative democracy approach. Five sessions were run by an independent facilitator and a sample of 39 people were selected to participate. The sample broadly represented Tāmaki’s demographic profile as at the latest Census – age, gender, ethnicity, local board area, housing tenure (owners and renters). The participatory forum included a representative sample of Māori participants. The purpose of the engagement was to work with a representative sample of the Tāmaki Makaurau population to understand natural hazards and risk, and to explore risk	Captured through wider engagement. e.g., participatory forum.

Natural Hazards Plan change		Status
	tolerance, risk levels (acceptable, tolerable, intolerable) through working through different scenarios. The engagement sought to understand the how the risk should be based on – average adults or children, elderly etc. What types / scales of consequences that the AUP can manage from a natural hazard event. What mitigation or influences might change an ‘intolerable’ risk to a ‘tolerable’ risk. This is reported on separately through the wider Consultation process and will be presented to the Policy & Planning Committee workshop on 11 December 2024.	
Māori organisations and other entities (targeted engagement)	Section 81 of the Local Government Act requires councils to establish and maintain processes to provide opportunities for Māori to contribute to the decision making processes of the local authority. This includes considering ways in which it may foster the capacity of Māori to contribute to decision making processes and providing relevant information to Māori for this purpose. The purpose of this engagement is to engage with organisations to identify, quantify and evaluate opportunities and issues associated with housing for Māori, impacts on Māori businesses, and other relevant matters pertaining to Māori. To raise awareness of the issues/risks. We will undertake targeted engagement with urban Māori authorities and other Māori organisations, where they are likely to be impacted by the NHPC. The remaining entities will be captured and reported on by the wider consultation process.	Captured through wider engagement.

4. Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan

Te Ora ō Tāmaki Makaurau Wellbeing Framework⁵

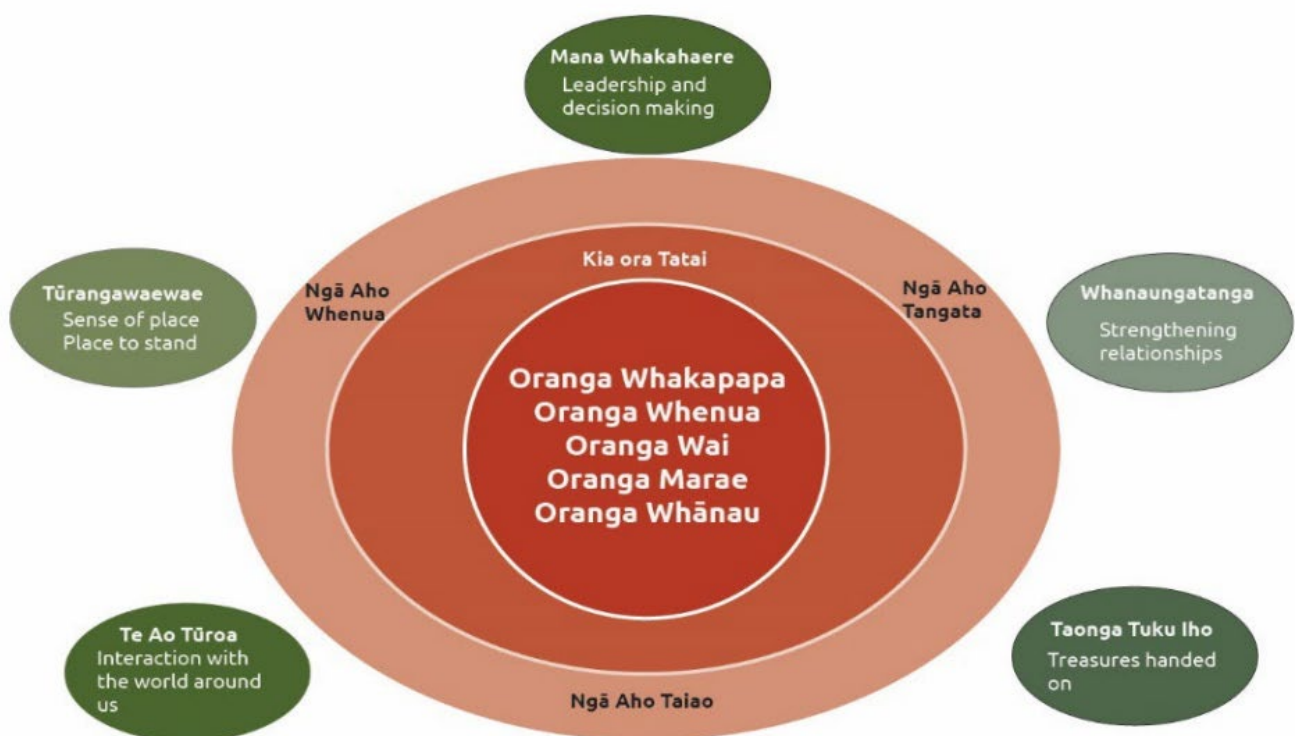
Te Ora ō Tāmaki Makaurau is the well-being framework developed by the Mana whenua Kaitiaki Forum in response to Te Tāruke-ā-Tāwhiri.

Within the framework, Kia Ora Te Tātai describes the world as a dynamic and complex ecosystem of whakapapa interconnections and interdependencies. All things – people, birds, fish, trees, weather patterns – are members of a cosmic family. Humans not only depend on ecosystems, but also influence them.

There are key linkage points between Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan and Te Ora ō Tāmaki Makaurau, which will allow them to be used together. The wellbeing framework is a regional innovation that is built on generations of knowledge and reflects the world view of the various mana whenua iwi, rangatahi Māori and Māori communities of Tāmaki Makaurau.

Descending from Kia Ora Te Tātai are three dimensions of well-being. These dimensions can frame our understanding of an ecosystems or whole living systems approach to health and well-being.

Te Ora ō Tāmaki Makaurau Wellbeing Framework



⁵ Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan, page 31.

Ngā Aho Taiao

The ability and capacity of te taiao to sustain and manage whole living systems and regenerate its own mauri, while contributing to the mauri of people and land.

Ngā Aho Whenua

The ability and capacity of the whenua to sustain and maintain whole living systems and regenerate its mauri, while contributing to the mauri of people and nature.

Ngā Aho Tangata

The ability and capacity of te taiao to sustain and maintain their mauri, while contributing to the mauri of the land and nature.

For mana whenua, this relates to their ability and capacity to maintain, sustain and regenerate their specific whakapapa relationships with land, nature and people of Tāmaki Makaurau.

Māori values and principles

A te ao Māori lens can frame our thinking about and approaches to climate change. It also ensures that the notion of taiao, whenua and tangata remain an important focal point for all climate change related decisions.

Our te ao Māori lens is structured around core Māori values and principles derived from Māori views of the world. These values and principles provide an insight into Māori concepts and beliefs anchored upon intergenerational symbiotic relationships between people, place, nature and the wider universe (whole living systems) and the reciprocal responsibilities and obligations to care for, protect, activate, maintain and regenerate these whakapapa relationships.

The values and principles in the well-being framework are:

- Manaakitanga
- Kaitiakitanga / tiakitanga
- Whanaungatanga
- Rangatiratanga
- Mātauranga
- Ōritetanga
- Tōnuitanga

These values and principles when applied, can also be categorised as Ngā Mahi a te Ora / Well-being Activities.

The five elements of the Te Ora o Tāmaki Makaurau Wellbeing Framework have helped to frame the key themes we have heard from mana whenua through the engagement process.

5. Urupare

Feedback

5A. Wānanga Tuatahi – Technical Wānanga – Introduction to natural hazards plan change (18, 21, 30 October 2024)

5A.1 Mana Whakahaere : Leadership and decision-making

5A.1.1 Issues of significance to mana whenua in relation to natural hazards

- a. Chapter B6 should activate recognition of mana whenua values in managing natural hazards. Consideration of cultural values should be an overarching consideration for decision making.
- b. AUP should provide clear definitions of the hazards that are being mapped, and be clear about how information is mapped and methodology used.

5A.1.2 Recognition of individual interests

- a. Recognising the mana motuhake of each iwi / hapū entity. Mana whenua sought a clearer understanding how the plan change will recognise the individual values and interests of each iwi / hapū entity through the collective engagement approach.
- b. The importance of recognising the individual values and interests of each group as well as the need for flexibility in the AUP provisions to enable these to be recognised and provided for in the response to natural hazards. This was particularly important at a local scale where Māori values and interests may be adversely affected by natural hazards. For example the response is likely to vary due to a range of factors and will be guided by the cultural landscape and historical context, mātauranga Māori and appropriate tikanga and kawa of those affected was a consistent theme that they would refer to, to guide their response.

5A.1.3 Recognition of mana motuhake in recovery efforts and decision making

- a. Recognising mana motuhake in the role that mana whenua often play in supporting emergency and recovery efforts. Providing opportunities in the Plan so that Council can transfer certain council powers to mana whenua by removing the red tape to enable them to support their own people and undertake their role as kaitiaki during times of emergency and recovery processes. For example, direction provided through Order in Council legislation, RMA s33 transfers of powers for certain functions such as monitoring emergency works.
- b. Recognising the importance of mana whenua inputs to decision making. Historically Auckland Council has allowed development in natural hazards areas. Mana whenua have not been engaged with in those processes to fully understand the situation. Examples were given of mana whenua opposition to development in locations that have now been impacted by natural hazards.

5A.1.4 Taking a pre-cautionary approach in areas of uncertainty

- a. Council planners need a greater ability to say 'no' to development in areas at high risk of natural hazards. Support down-zoning areas of land that were zoned in flood plains.
- b. The new government is providing for intensification in areas that are not appropriate for development. Consideration of whether the AUP needs to have stricter controls than the national direction in some instances. Providing opportunities for mana whenua to input into council submissions on these legislative changes would be beneficial.

5A.1.5 Access to information

- a. Mana whenua need access to council's technical experts to help understand the issues and provide an informed response. A number of technical questions were asked during the sessions that the planners were unable to answer and needed to defer to experts. (Note: these have been captured and will be part of an FAQ to be developed with the technical experts).
- b. A number of groups requested individual hui with the experts to understand their individual issues. (Note: these have been noted and follow up will be arranged).
- c. Greater clarity is needed on how mana whenua can input to this plan change and provide specific detail to help address the issues they see.

5A.1.6 Consideration of equity in the planning provisions

- a. How is equity being considered in this plan change?
- b. Socio-economic component of areas within Tāmaki Makaurau where there are high populations of Māori have become more vulnerable to natural hazards. Need to recognise that some areas may be more significantly affected by natural hazards than others due to socio-economic factors and may have a lower tolerance to risk. E.g., Māngere / Bader Drive / Te Ararata and parts of Pukekohe were significantly impacted by the recent floods. Development is continuing to occur in those areas need to consider how to avoid exacerbating the risk through changes to the plan.
- c. Need to consider costs of deferring technical assessments to resource consent processes, e.g., geotechnical reports can be costly and many marae who already have constraints in regard to raising finance on multiply owned Māori land would not be able to afford these. Consider whether there should be some priority areas identified where this is to be done by the council as part of structure planning, precinct planning.

5A.2 Whanaungatanga : Strengthening relationships

5A.2.1 Engaging with mana whenua at the appropriate levels (governance vs operational).

- a. Some groups identified that engagement on impacts on significant decisions including but not limited to treaty settlement land or commercial interests is usually a governance kōrero, while kaitiaki provide guidance on environmental, social, cultural and operational matters. Some groups noted there were exceptions to this rule where due to their organisational structure some representatives may be able to engage at both a governance and kaitiaki level. It will be important to be guided by mana whenua as how they wish to be engaged at the appropriate levels through the plan development process.

5A.2.2 Recognition of the role of haukāinga in the plan change process

- a. Recognition that mana whenua do not speak on behalf of the haukāinga (local people of a marae, home people). Haukāinga must be engaged independently on issues that impact them directly e.g., responding to natural hazards that impact local marae, urupā, Māori land, papakāinga etc.

5A.2.3 Taking an integrated approach

- a. Lot of parts of council currently working on different aspects of this kaupapa e.g., Recovery Office, Making Space for Water, Shoreline Adaptation Plans, Iwi Local Preparedness and Recovery Plan. It's important to provide an integrated approach to engagement and share what we are advising in

different spaces (subject to mana whenua agreement). A wiring diagram of how all the workstreams are connected would be useful.

- b. Opportunities for Auckland Council Healthy Waters to work together with Auckland Transport (AT) to improve modelling, risk management around transport infrastructure. This requires an integrated approach to address historical issues around land use decision making e.g., urban design rules in Balmoral in relation to AT infrastructure need to be addressed.
- c. Northland Regional Council have been working through the issues with their Climate Change Committee on implementation of National Policy Statement Freshwater Management (NPSFM), climate change adaptation and freshwater farm plans. Technical reports, data and modelling has been prepared that may inform this process. Key areas of overlap include the Waitematā Aquifer which crosses both Northland and Auckland. Recommend councils share data and expertise. Te Uri o Hau have done a lot of work on developing their own cultural indicators which may be relevant to this kaupapa.

5A.3 Taonga Tuku Iho : Treasures handed on

5A.3.1 Greater recognition and protection of sites and places of significance to mana whenua (scheduled and unscheduled) is required.

- a. The plan change needs to acknowledge that Natural Hazards pose a risk to life, property **and cultural values**. The impact on cultural sites and places and mana whenua values and interests as a result of natural hazards has the potential to disproportionately disadvantage mana whenua as a large amount is now no longer in their ownership or control.
 - i. An example was provided through the workshops of land that is now in private ownership that is subject to natural processes resulting in coastal erosion and exposure and loss of kōiwi from a historic urupā. As the land is in private ownership there is little mana whenua can do to intervene and work with the land owner to protect the site and look at options to reinter the kōiwi, instead having to wait until they are exposed or lost to natural processes.
- b. Providing mechanisms in the plan to recognise, manage and protect unscheduled sites and areas of significance to mana whenua that are at risk of natural hazards. For example., where there are known wāhi tapū / urupā and areas at high risk of accidental discovery e.g., historic battle sites, pā, papakāinga where kōiwi and artefacts have been uncovered in the past, through the use of silent files, alert layers, improved accidental discovery protocols and other means.
- c. Our pā are being affected by natural hazards and need to be considered as part of the plan change.
- d. Our urupā in coastal areas are already being affected by coastal inundation and restricting their use. Inundation of groundwater is affecting existing burials. Some groups are already considering options for alternative locations, however in many areas land is unavailable and / or unaffordable close by.

5A.3.2 Upholding the outcomes of treaty settlements

- a. Land that is owned by mana whenua in Tāmaki Makaurau has either been returned through treaty settlements as cultural or commercial redress or is held in multiple ownership under Te Ture Whenua Māori Land Act.
- b. A number of iwi / hapū are now developers as well and have commercial interests that need to be considered. Decisions on risk tolerance that have the potential to impact cultural and / or

commercial interests should include kaitiaki and be endorsed by governors. It is not fair to ask kaitiaki for advice on matters that they are not mandated to engage on.

- c. Each iwi have their whakatupuna and long term goals. The answers to some questions are not always cut and dried, we are all different in what our aspirations are.
- d. Context of the last 15 years in relation to the iwi of Tāmaki Makaurau needs to be understood. A number of groups have through their treaty settlements been returned cultural redress properties, which are historical redress in response to Treaty breaches. This redress provides mana whenua development opportunities / rights, along with monetary redress. Changing the planning rules in response to natural hazards has the potential to undermine the outcomes of treaty settlements, and need to be understood and recognised in this context.

5A.3.3 Recognising the cultural values and constraints of Māori land and Treaty Settlement land in relation to natural hazards.

- a. There are limited areas of Māori land remaining in Tāmaki Makaurau. Recognition of the significance of these areas as often they contain marae, papakāinga, urupā, ngāhere, areas of significant ecological and cultural values. We need strong tools in our kete to enable relocation of our marae and associated infrastructure where they are affected by natural hazards. It will be important to find ways to enable haukāinga to make decisions on how to respond to natural hazards of their land.
- b. A number of groups have now finalised their treaty settlements with the crown and have signed deeds of settlement pending legislation or treaty settlement legislation in place. A number of groups are still in negotiations. The land that is offered to mana whenua as part of their treaty settlement redress is often surplus to crown requirements and contains covenants and restrictions on its use. It is important to understand how natural hazards impact on sites and places subject to treaty settlement redress to ensure the outcomes of treaty settlements can still be achieved. Further engagement is required with mana whenua governance to better understand this issue and potential policy response.

5A.4 Te Ao Tūroa : Interaction with the world around us

5A.4.1 Greater use of mātauranga Māori and cultural indicators

- a. Our cultural landscape has changed and there is a disconnection to our taiao. Allowing people to re-connect through providing opportunities for the use of cultural indicators to monitor the impact of natural hazards. Improving our understanding of the signals our people are now seeing in particular with our taonga species. For example, short finned tuna area around for longer timeframes indicating increased temperatures. Each hapū understand their own mātauranga and indicators, some groups already have this information mapped as a result of freshwater planning.

Refer to the thesis by Apanui Skipper “Ko Te Kawa Tūpanapana I Ngā Hau Tūpua a Tāwhiti-Mātea – The Validation, Revitalisation and Enhancement of Māori Environmental Knowledge of Weather and Climate” as a useful reference on how mātauranga can be applied

<https://researchcommons.waikato.ac.nz/server/api/core/bitstreams/33deb5c5-c612-4c5d-9d0b-8c8716e60a65/content>.

5A.4.2 Impact of historic decision-making

- a. The impact of previous council land use planning and resource consent decisions have resulted in development occurring in areas at high-risk of natural hazards. Understanding the historical environmental context where development is proposed can help to inform appropriate development. These are places historically mana whenua have advised against development e.g., development in Muriwai in areas already known to be subject to instability, sand mining in the Kaipara Harbour, piping of natural streams.

5A.4.3 Raising awareness of the risks to people and communities

- a. People and communities need to be aware of the risk of intensification in areas where there is inadequate infrastructure to cope with natural hazards. E.g., Forrest Hill – significant intensification but no plans to improve the infrastructure.

5A.4.4 Cumulative effects of resource consent decision-making need to be better understood

- a. Downstream /cumulative effects of resource consent decision making on natural hazards greater consideration. For example:
 - i. Sand mining in the Kaipara will result in flow on effects in other locations. A holistic understanding from a te ao Māori lense is important to understand the impact.
 - ii. Impacts of water takes during times of drought – improved monitoring required and input from mana whenua.
 - iii. Pine forestry industry, lack of monitoring of impacts of forestry activities resulting in forestry slash impacting houses, roads and bridges during flood events.
 - iv. Flooding of the Auckland Airport Terminal during the anniversary weekend floods is not surprising considering it is sitting on top of a reclaimed Manukau Harbour.
 - v. Urban intensification has exacerbated the impacts of natural hazards resulting in water shortages during times of drought, resulting in the Waikato Awa water takes. There are many things that we can do to mitigate the risk of drought and in times of flooding through Planning controls such as making roof tanks a minimum requirement for all new dwellings, 1000 litre slimline tank on all properties – this would keep a lot of stormwater off the streets in the initial downfall. In areas of known hazards – council can take a precautionary approach and say ‘no’ to development in those areas.
 - vi. Resource consents to discharge water to a stream will have consequences of downstream flooding. Impacting downstream properties including marae. Improved modelling to inform decision making. Requiring post-development run off to be no greater than your pre-development run off. This may mean you need a few less sites or include measures to reduce flows.
 - vii. Changing the augmentation of waterways has an impact.

5A.4.5 Wildfires / drought

- a. Wildfires are an issue they result in ecological degradation and biodiversity loss.
- b. Wildfires – planting native species that are resistant to fire such as Puriri / Taraire. Mana whenua would like council’s ecologists to provide a list of indigenous species that are more resistant to fire, so that they can be recommended in high fire risk areas.

- c. Greater controls on burnoffs of native bush, or public having fires on coastal edge. A change in wind direction can put local marae and papakāinga at risk as well as impact the ngāhere. e.g., Maraetai, Hunua, South Muriwai, Pakiri – higher risk in summer due to camping.
- d. The plan currently provides limited control of water takes from natural aquifers. Preventing more depletion of our natural aquifers which could be a valuable resource in times of drought or a potential resource for addressing the risk of wildfires.
- e. Potential for the Building Code to be updated to address some of these issues, including the need for additional water supply in fire risk areas.

5A.4.6 Land instability

- a. Mana whenua are supportive of providing input to council's land instability database.
- b. Need to make sure the information contained in geotechnical reports has longevity and are a useful resource over time. Reports need to be ground truthed and not just a desk top assessment that can be cut and pasted to different properties.
- c. Need to consider how development might impact the ngāhere in particular loss of Kauri as a result of landslides.

5A.4.7 Design of existing and future public infrastructure needs to be future-proofed to mitigate / avoid natural hazard risks.

- a. The harbours are of particular significance to mana whenua. Existing and future infrastructure must be future-proofed to mitigate against hazards and include consideration of how sites will be maintained over time.

An example where existing infrastructure has been poorly designed making it difficult to do maintenance on the site was the western Hobson Bay end of the Ōrākei main sewer line at the end of Logan Terrace where there is a need to park cranes on Logan Terrace in order to do maintenance of the site.

An example where existing infrastructure is providing protection against natural hazards was where Tāmaki Drive is providing buffering against wave action and protecting the eroding cliffs from further subsidence.

5A.4.8 Elevating the importance of regeneration of natural systems (streams / overland flow paths) to mitigate / avoid natural hazard risks.

- a. Support for the regeneration of natural systems (streams / overland flowpaths) however not to the point that they become overloaded. These systems can provide natural purification of water prior to discharging to the sea.
- b. Stormwater needs to be managed so it doesn't exacerbate erosion of cliffs.

5A.5 Tūrangawaewae : Sense of place to stand

5A.5.1 Understanding historic associations of mana whenua and the cultural landscape

- a. Understanding the cultural landscape and historic associations of mana whenua with the local area can help to guide decision making for example location of maunga, pā sites, awa and areas of historic occupation are indicators of where cultural values exist. There is already an evidential base of historical occupation / cultural mapping as part of the Puhinui Precinct Plan.

- b. Responding to natural hazards using a te ao Māori lense can enable more appropriate decision making. Understanding the context and how often places are used, for what purpose is important to understand the significance of a site and tikanga practices that should be followed. It is difficult for mana whenua to categorise levels of risk and tolerance on natural hazards impact their cultural values as every situation is different, and may have a number of overlapping interests.
- c. Areas of historical occupation where our haukāinga still reside on Māori land / marae / papakāinga are in flood prone areas and / or impacted by coastal hazards and require their own engagement to understand the impacts e.g., Whaataapaka, Umupuia, Puukaki, Ihumatao. The cultural landscape map for the Puhinui Precinct shows evidence of historic occupation in Puhinui. How can the Plan recognise the importance of these places and the significance of these areas to prevent them from intensification and downstream effects on our traditional sites and places. E.g., cultural mapping, evidential base.

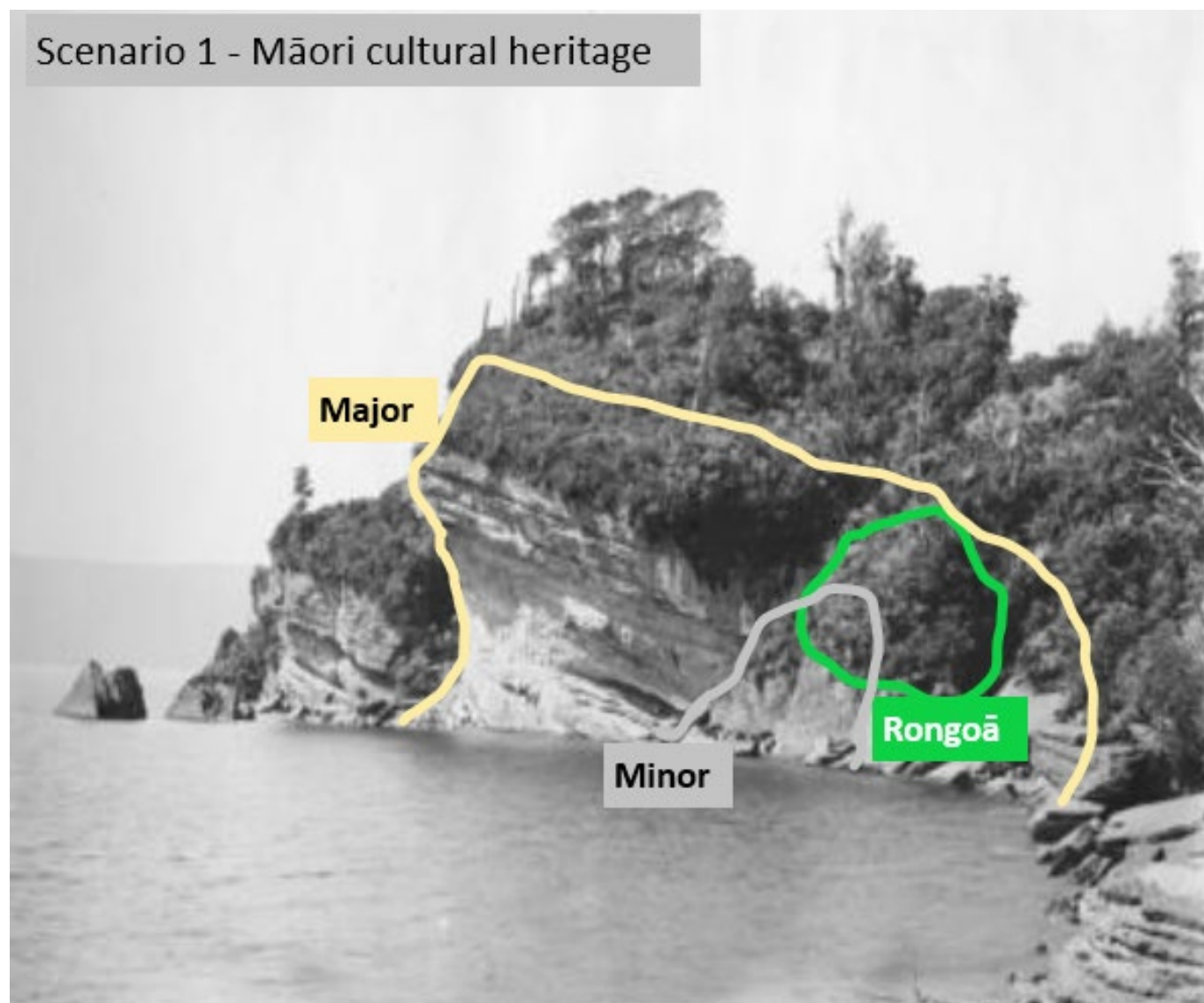
5B. Wānanga tuarua – technical wānanga – Natural hazards scenario testing (1, 5, 7 November 2024)

The scenarios provided were hypothetical to encourage a general discussion on risk tolerance (acceptable, tolerable, intolerable). The feedback received reflects the individual views of kaitiaki and does not necessarily represent the position of their respective governance or other mana whenua entities. We have intentionally not identified which groups made the comments for this reason. The intent was to represent a range of perspectives for each scenario.

We acknowledge based on the feedback received that each scenario a clear message that needs to be considered on a case-by-case basis, in consultation with the appropriate iwi / hapū / whānau who can help to determine the appropriate tikanga and kawa to be followed. The plan needs to provide flexibility for this.

The scenario testing workshops set out to provide a range of scenarios

5B.1 Scenario 1a – Māori cultural heritage



Scenario 1a – Māori cultural heritage on land in private ownership

- The site is a pā, a wāhi tapu located on a headland subject to coastal erosion and land instability.
- Apart from terracing and ditches, the site no longer has physical pā structures. Intangible values remain.
- There are some areas of rongoā in the small valleys of the headland.
- The pā was an important defensive site however the kōrero tuku iho does not elevate its mana above those of other pā sites within your rohe.
- While your iwi are able to access the site, it is not a site where customary practices are performed.

Scenario 1b – Māori cultural heritage on land in private ownership

In this scenario, the pā in scenario 1a is known as a site of high cultural significance and mana for your iwi.

- The site is a pā, a wāhi tapu located on a headland subject to coastal erosion and land instability.
- Apart from terracing and ditches, the site no longer has physical pā structures.
- There are some areas of rongoā in the small valleys of the headland. Intangible values remain.
- The pā was an important defensive site and holds significant mana. It is recognised as an important site by iwi and hapū outside of your rohe.
- Customary practices, such as hui ahurei o matariki, are undertaken on this site.

5B.1.1 Mana Whakahaere :Leadership and decision-making

- a. It should be up to the respective iwi to determine what is an acceptable risk and whether they wish to have the ability to retrieve anything or whether the site should be left to allow natural processes to take their course.
- b. Likely to be different views by different iwi. For example some may consider pā sites ok to let nature take its natural course. In areas where there have been artefacts / kōiwi discovered some may have a different view.
- c. The AUP needs to provide a greater ability for council planners to say ‘no’ to resource consent applications seeking further development on headland pā. Reducing the impacts of human activity exacerbating the erosion is important to reducing the impacts on Māori cultural heritage.
- d. Each group will have its own kawa and tikanga on how best to respond. Many groups tend to re-inter kōiwi close to areas where they have been found, however in some cases there is limited land available. The plan needs to include provisions to find land suitable for re-interment nearby. In some cases in the past where there hasn’t been an appropriate location for reinterment kōiwi have been left in containers for a number of years which is not what we would want.

5B.1.2 Whanaungatanga : Strengthening relationships

- a. The plan needs to recognise that in some areas mana whenua no longer have access to the land where it is now in private ownership. As a result they have very little ability to influence what mitigation occurs. It is important for the plan to provide opportunities for mana whenua to be involved in decision-making on the management response where unscheduled sites of Māori cultural heritage are being exposed on private land due to natural processes.
- b. Local government should provide funding / incentives to Mana whenua and private land owners to work together to mitigate the risk of further kōiwi being exposed and proactively explore options for reinterment in cases where this has already occurred.
- c. In recent cases some groups have worked with council to reinter on reserves and put big boulders on them to protect them. This should be a permitted activity in the Plan there is not always time to wait for legislative processes to act. E.g., a greater role for mana whenua in emergency works provisions or in instances of accidental discovery through mechanisms such as s33 transfers of powers or s36 joint management arrangements.
- d. Council needs the ability to force landowners to act and work in partnership with mana whenua in situations where kōiwi are being exposed due to natural processes on private land.

5B.1.3 Taonga Tuku Iho: Treasures handed on

- a. Council needs to consider costs of human intervention to protect sites of high cultural values. Planning mechanisms need to take into account the cultural values of sites at risk from natural hazards not just the value of property that will be affected.
- b. Any mitigation needs to consider the long term impacts, what we do now is going to affect the next 2-3 million years.
- c. The plan needs stronger recognition and protection of unscheduled sites of significance to mana whenua in response to natural hazards and to elevate their significance in the plan. e.g. sites of significance to mana whenua in former quarried mines where paapa rock souring occurs over time.
- d. In areas where there are known kōiwi are being exposed through natural processes, (particularly where they are in view of public places) they can become well-known and artefact hunters come to the site looking to find them. There needs to be flexibility in the plan to enable council and mana whenua to intervene in order to protect the site.
- e. If the weather takes the place there will always be something that remains there. If there is rongoa, there is still the ability to take the seeds of that plant and replant them elsewhere.
- f. Providing areas on council reserves as wāhi tapu for reinterment. It is important that the reserve classification aligns with this purpose as well.
- g. Look at options to fast track scheduling of sites of significance to mana whenua in cases where they are at risk from natural hazards.

5B.1.4 Te Ao Tūroa : Interaction with the world around us

- a. Understanding what is causing the impacts, natural processes such as wave action is one thing, but understanding how human activity such as boat wakes can be a contributing factor in the long-term.
- b. For very significant sites in some cases, some Iwi may consider there is a case for intervention to reduce impact of erosion to delay or reduce the impacts of natural processes on the headland.
- c. There are tohū that indicate areas of high risk of accidental discovery e.g., pā and midden sites. The plan needs a Māori cultural heritage alert to limit development in those areas or make development non-complying.

5B1.5 Tūrangawaewae : Sense of place to stand

- a. Importance of understanding the cultural context, how the place was used by mana whenua in the past to help understand the significance of the site.
- b. Understanding how the headland pā fits into the wider context of pā along the coastline will help to understand its historic use and significance.
- c. Understanding the Māori name of the site can provide a lot of insight into the cultural associations. Looking back to the kōrero of our kaumātua. Even something as simple as a battle between two brothers, or a marriage indicates a connection.
- d. Understanding how the eroded headland looked 10 years ago vs 100 years ago can influence how we choose to respond.
- e. Cultural landscapes need to be recognised in their entirety. The blood of a person is tapū. There is no one way to define our Māori cultural heritage – there is a category laid over the top. Why should our heritage be given lesser weight than that of a stone mason building that is subject to erosion.
- f. Nohonga areas are important. Historic gardens are places where you will find artefacts during earthworks. These can be really significant as it was the areas we lived.

5B.2 Scenario 2a and 2b – Impacts on urupā

Scenario 2 – coastal urupā



Scenario 2a – Coastal urupā

- You know of an area in your rohe which is an ancient coastal urupā. It is located in a low lying area.
- The urupā contains pōhutukawa that were known to be used for secondary burial practices.
- The area is near a rivermouth and is subject to flooding and coastal inundation
- The location of the kōiwi are not known for certain.

Scenario 2b – Coastal urupā

In this scenario, the urupā in scenario 2a is part of a marae which whakapapa to your iwi.

- The boundaries of the urupā are accurately known as are the locations of the kōiwi.
- Your governance representatives have sought your advice prior to engaging with the marae trust to understand what support the marae needs.
- The urupā contains pōhutukawa that were known to be used for secondary burial practices.
- The area is near a rivermouth and is subject to flooding and coastal inundation.

5B.2.1 Mana Whakahaere : Leadership and decision-making

- a. It's location based so you can't put a generalisation over the top of it.
- b. Every iwi has their own view and whether it's consistent across the lot is quite different and a different kaupapa if that makes sense. But it still comes back to a governance lead from my personal perspective who will make the decision on what happens around the urupā.
- c. Practices tend to differ – we don't like people driving on the beaches where we are as we used the sandy beaches to prep the bodies for burial. Some beaches were historical battle sites and people were buried where they lay.
- d. Comes down to a case by case basis.

- e. We don't know if they were friend or foe – if they are there we have a process in place to re-inter anything that comes out of a natural hazard – what can you do.
- f. If it is known in advance we would oppose development in that area if high risk of accidental discovery.
- g. Council need to identify the risk and prioritise it so that can put the decision back to the marae / rūnanga to engage with respective whānau to decide.

5B.2.2 Whanaungatanga : Strengthening relationships

- a. A lot of the time a hui a iwi will have to be called as dealing with multiple families – kaumātua can't make the decision without the collective view. That is a big decision to move something. Need to involve all whānau that whakapapa to that urupā to make that decision.

5B.2.3 Taonga Tuku Iho: Treasures handed on

- a. It will be protected well if it starts eroding because council appear to be using it as a park. I'm not sure how council would feel if I took my picnic basket as sat on top of someone's great-great grandparents to have a feed. I kind of find it's a bit disrespectful if it's a known urupā. I don't know if this is a good example or not as it's a council asset, and not sure if it's jointly owned with iwi. If iwi owned, would suggest there'd be a lot more trouble trying to protect it.
- b. Through my experience with the Waitangi Tribunal was that if a site containing an urupā was provided to settlers, often the contents in the urupā ended up in European museums. There are still huge numbers of artefacts in Europe and the Auckland Museum as a result of grave robbing. Identifying the site as an urupā could be detrimental as it raises awareness of its location and could put it at risk of artefact hunters.

5B.2.4 Te Ao Tūroa : Interaction with the world around us

- a. My initial cultural response would be how often do you go and visit and for what purpose and therefore how important is it from that aspect as a piece of land. From an inter-generational perspective, what gave iwi confidence to bury them in area i.e. what was the existing environment at time of burial which compelled iwi to use space as an urupā and what was expected of future generations in terms of following our tikanga practices. Consequently, hard to say in terms of level of importance and dealing with natural events.

5B.2.5 Tūrangawaewae : Sense of place to stand

- a. If there was a pā there then the whole of the area is a wider cultural landscape.

5B.3 Scenario 3 – Coastal cliffs eroding with taonga species

Scenario 3 - coastal erosion and taonga species



Scenario 3 – Coastal cliffs eroding with taonga species

- Within your rohe are pari (coastal cliffs) with taonga species of bird nesting near them.
- Set back some way from the cliffs are areas of forestry owned and operated by private commercial forestry companies.
- Some private dwellings are located in quite close proximity to the cliffs.
- There are no offshore activities other than occasional recreational fishing boats and kayakers.
- The coastline is subject to coastal erosion.

5B.3.1 Mana Whakahaere : Leadership and decision-making

- a. It is intolerable if the bird habitat was lost, but if you can find them a more appropriate habitat that they can relocate to that would be a good option.
- b. Creation of alert layers for inclusion in Te Mātāpuna mō ngā Hapori – Resource Consents Portal, of where these locations exist could be a way to keep information secure.

5B.3.2 Whanaungatanga : Strengthening relationships

- a. If many species are identified on coastal edge mana whenua are interested in working with council and DOC to define that coastal edge and explore options for mitigation.

5B.3.3 Taonga Tuku Iho: Treasures handed on

- a. The mitigation and protection measures for those species is important to us.
- b. Other kōiwi we haven't spoken off – is those that have come from whales – we bury them and have had some that have been exposed. Do we indicate that on a hazard map? We have those areas

mapped and identified them with GPS with DoC. If we have mapped them what are we able to do through the plan. They are a taonga and we do excavate them at times.

- c. With regard to the DoC maps we protect the taonga the best we can. It needs to be understood and acknowledged.

5B.3.4 Te Ao Tūroa : Interaction with the world around us

- a. Looks like classic case for a restoration project where you could create bird habitat. Now that the foreshore is being taken up by houses – putting in a retaining wall to protect the cliff will result in the loss of the bird habitat.
- b. Would support hydroseeding to protect the cliff edge and restoring some of that habitat to protect the birds.
- c. 100% do some planting.
- d. Front left you could build out to create bird habitat.
- e. Looks like pine radiata may be collapsing, causing some of the erosion.
- f. The left corner is going to get worse mostly silt and dirt which would get washed away in next big storm.
- g. Look at finding locations close by so species can stay in same location and are not displaced.
- h. If there is contaminants in the soil then would not want it left to contaminate tīkapa moana.
- i. Overland flowpaths could result in a waterfall happening there.
- j. Pine trees – with shallow root systems and shouldn't be there either – likely to be privately owned . If it was council owned land would recommend they get rid of them all.
- k. Would prefer at least 100m setback off coastal margins for forestry.

5B.3.5 Tūrangawaewae : Sense of place to stand

- a. Have observed rivers reverting back to their original course as a result of these weather bombs. Need to be mindful of this.

5B.4 Scenario 4 - Treaty settlement land.

Scenario 4 - Treaty Redress Land - papakāinga



Scenario 4 – Treaty redress land - papakāinga

- Your iwi has settled with the crown and has received cultural redress land which is located close to an ancestral awa.
- The site is currently planned for papakāinga housing but you have identified using the council hazard maps that there is a flood risk.
- You have had discussions with the council flooding experts to determine the size and intensity of a possible flood event.
- Your iwi governance has sought your advice prior to considering the future use of the site.
- You consider potential future development of the site as a papakāinga constructed to the current building standards.

5B.4.1 Mana Whakahaere :Leadership and decision-making

- a. The intent of treaty settlements is to redress historic issues between the crown and mana whenua. Council coming along and defining what you can and cant do on these properties is problematic.
- b. Fundamentally cultural and commercial redress already has restrictions on its use.
- c. Natural hazards will make this more challenging – how do you get a policy to recognise or understand the complexity of that issue.

- d. I'd suggest that this is a governance conversation and the comments I've made are based on my observations over the years and not on behalf of the governance of my Iwi. I am here as my role as kaitiaki.
- e. If this scenario area was settlement land, how can we offset the costs i.e. either the value of this asset or invest in something somewhere else where we do actually want to live, it would be one of these scenarios our governance would be thinking of in terms of risks or opportunities. So I have an idea of the awa shown in the scenario and this particular awa and the way people are responding to it on the whenua and their orange. The other factor I guess is the area shown in scenario is tidal (as shown by boats in photo), so even that could have a potential impact. Really a governance conversation from a kaitiaki level in terms of off-setting and looking at other locations or other options to generate revenue so can but where you actually want to buy. But our people have never really thought about this stuff. The whole concept of parcelised land is not a Māori one. Our tupuna would just move and come back with the seasons as area is scenario is mahinga kai.
- f. The first you'd do is sell the land and buy somewhere that is not going to flood. However, whoever buys the land, it's not going to be worth that much when compared with safer land. For example, look at Aka Aka and the land down there sells for a lot of money, but in saying that, they've got the Waikato Drainage Board and they go to a lot of expense so the farmers can farm it. I wouldn't want to live there, but the land is generally pretty fertile because it was a swamp. So realistically, this is a governance discussion and not a kaitiaki discussion.
- g. I guess one of the challenges is that it's treaty redress land (surplus to crown requirements). Is because no one else wanted it.
- h. Would look at options to renegotiate with the crown to try and identify a more appropriate location
- i. Every scenario is different.

5B.4.2 Whanaungatanga : Strenthening relationships

- a. You'll need governance input well before April so it would be good to go out and meet with governance in a space that they understand and not a space that you feel comfortable in which is sitting in a big building in the middle of Auckland.

5B.4.3 Taonga Tuku Iho: Treasures handed on

- a. The crown has given us poor quality land – all our native land is in the DoC estate and identified as abandoned Māori land.
- b. Land we do get back we have to buy it back.
- c. What about upholding the impacts of natural hazards e.g., pre-settlement land where a deed of settlement has been signed awaiting legislation?
- d. Unless its commercial redress properties – the value and ability to build in some of those locations is potentially lost.
- e. There is an intent that the commercial redress is there to support mana whenua to achieve economic benefits. Opportunities to not pay development contributions is an option council could consider.
- f. A lot of our cultural redress properties are about the connections to the land – shouldn't have an automatic assumption that its not for commercial use, but equally we still want to maintain our connections to this land.
- g. If there are offsets should consider how these could be provided to support development of treaty settlement land.

- h. Council should consider allowing incentives for Iwi to develop wetlands / rongoa / mahinga kai on redress properties where they are affected by inundation.
- i. We have landlocked properties that have been returned to us by the crown.
- j. Finding opportunities for us to utilise our cultural redress land to uphold our settlements.
- k. Cultural redress is quite different to commercial redress.
- l. We will have different drivers for wanting to continue to use our cultural redress land – the change from how it has been used in the past eg. seasonal to permanent.
- m. It is an option to relocate – but not everyone will want to. If I was offered rubbish land I would want the opportunity to be provided at least.
- n. We have had a piece of land returned in a flood prone area that is cultural redress, contains an urupa which we would want to maintain access to.
- o. Each redress that is offered (cultural or commercial) is surplus land – that the crown does not want.
- p. If your pā site was on crown or council land you can't always pick that as part of your settlement– it needs to be on the list of properties they want to negotiate with.
- q. All crown owned property is redress in Tāmaki Makaurau as its identified as right of first refusal through the Tāmaki Collective Settlement (Tupuna Maunga). Would like to see an assessment of all land owned by crown – and how its impacted by flooding. Any road reserves, land owned by Ministry of Education etc.

6.4.4 Te Ao Tūroa : Interaction with the world around us

- a. Realistically, if anyone wants to build in the scenario area, they either have to put all their homes on stilts so they're a couple of metres off the ground and you climb upstairs, or you let them do what Stevenson did in Drury South, bring in a lot of fill and build like a canal around so that when it rains, it runs off the fill, into the canals and awa.
- b. Regardless of where you live in a major wetland like this one, you have shifts of water, you have shifts of everything. If you put someone in an area that floods, you suddenly find a stream where the road and house is, unless you have a jetboat, you have a major problem.
- c. If you want to build a papakāinga, surely there are two things to be considered first; the health of the awa and whenua and the health of the people. But if you're building in a floodplain, that's stupid, but if you're determined to build there, it should be done so buildings are safe for people and also safe for awa and whenua. There's only two ways (there may be others) I can think of this can be done [as mentioned above].
- d. Uneconomical land of course you wouldn't build there, unless there was an option where you could use it for a certain number of years – potential for use as a top soil clean fill site to help raise the levels to make it appropriate for development. Only that option if there were no other options to find a more appropriate site.
- e. If access was an issue may need to consider boat access.
- f. Could still do planting and raise the land – put in a nursery. Could take the risk and put in gardens there – could look at options to use the land as mara kai.
- g. Over time we have observed our land is being used to offset the effects of development. Treaty redress is seen as perfect location to offset other peoples developments we are not seeing the benefits of our treaty settlements recognised in relation to the wider communities.
- h. In Auckland we don't have forestry, fishing, farming – we only have housing.

5B.4.5 Tūrangawaewae : Sense of place to stand

- a. Queried how often watercourse in scenario had changed course because if you get a change of watercourse, changes the whole aspect of anything and everything and where you build. Also worry about where the old watercourses were. If you look in the south where Kāinga Ora did all their work, you walk around and look at every flood channel, the houses were munted.
- b. For example, a hypothetical situation could be that papakāinga is built upon scenario area to look after taonga because for some iwi they may have been burial sites. Very much dependent on the context, with temporary papakāinga also being a possibility as seasonal structures.
- c. Would be hesitant to put my hapū on that land just looking at that river and the curves looks like the river could change path.
- d. Coastal statutory acknowledgements – most tribes have it, how is this going to acknowledge those areas.
- e. Potential use of the area as nohoanga – seasonal use. We might want to build semi permanent homes that could allow for nohoanga activities.
- f. Iwi would adapt could use for other purposes – mahinga kai / power generation.

Attachment A – Wānanga materials

(refer to separate attachments)

Attachment B – Hui attendees

18 Oct 2024 – Tuatahi - Introduction to natural hazards plan change (Session 1 of 3)

Planning and Resource Consents Department

- Matt Gouge (Facilitator / Māori Engagement & Policy Lead)
- Jacky Bartley (Māori Engagement & Policy Planner / Notetaker)
- Phill Reid (Manager – Aucklandwide Planning)
- Tian Liu (Natural Hazards Policy Lead)
- Ross Moffat (Natural Hazards Project Manager)
- Nicholas Lau (Land and Instability Policy Lead)
- Christopher Turbott (Other Hazards, Volcanoes, Wildfires etc – Policy Lead)
- Lee Ann Lucas (Coastal Erosion and Inundation Policy Lead)

Resilience and Infrastructure Directorate

- Ross Roberts (Chief Engineer, Engineering, Assets and Technical Advisory)
- Janet Kidd (Wai Ora Strategic Programmes Team Manager, Healthy Waters)
- Nick Brown (Regional Planning Team Manager, Healthy Waters)

Mana Whenua Representatives

- Te Ākitai Waiohū (Karen Wilson)
- Te Kawerau ā Maki (Kahurangi Raharuhi)
- Ngāti Tamaoho (Lucie Rutherford)
- Ngāti Tamaoho (Edith Tuhimata)
- Te Runanga o Ngāti Whātua (Tracy Walters)
- Waikato Tainui (Lorraine Dixon)
- Te Patukirikiri (Paulette Reidy)

21 October 2024 – Tuatahi - Introduction to natural hazards plan change (Session 2 of 3)

Planning and Resource Consents Department

- Matt Gouge (Facilitator / Māori Engagement & Policy Lead)
- Jacky Bartley (Māori Engagement & Policy Planner / Notetaker)
- Tian Liu (Natural Hazards Policy Lead)
- Ross Moffat (Natural Hazards Project Manager)
- Nicholas Lau (Land and Instability Policy Lead)
- Christopher Turbott (Other Hazards, Volcanoes, Wildfires etc – Policy Lead)
- Lee Ann Lucas (Coastal Erosion and Inundation Policy Lead)

Resilience and Infrastructure Directorate

- Janet Kidd (Wai Ora Strategic Programmes Team Manager, Healthy Waters)
- Nick Brown (Regional Planning Team Manager, Healthy Waters)

Mana Whenua Representatives

- Te Ākitai Waiohū (Karen Wilson)
- Ngāti Manuhiri (Helayna Tane)
- Ngāti Whātua o Kaipara (Julia Steenson)
- Ngāti Paoa (Tīpa Compain)
- Ngai Tai ki Tāmaki (Revell Butler)
- Ngāti Tamaterā (Michelle Wilson)

Apologies

- Te Runanga o Ngāti Whātua (Tracy Walters)

30 Oct 2024 – Tuatahi – Introduction to natural hazards plan change (Session 3 of 3)

Planning and Resource Consents Department

- Matt Gouge (Facilitator / Māori Engagement & Policy Lead)
- Jacky Bartley (Māori Engagement & Policy Planner / Notetaker)
- Phill Reid (Manager – Aucklandwide Planning)
- Nicholas Lau (Land and Instability Policy Lead)
- Christopher Turbott (Other Hazards, Volcanoes, Wildfires etc – Policy Lead)

Resilience and Infrastructure Directorate

- Nick Brown (Regional Planning Team Manager, Healthy Waters)
- Janet Kidd (Wai Ora Strategic Programmes Team Manager, Healthy Waters)

Mana Whenua Representatives

- Ngāti Maru (Craig Solomon)
- Te Uri o Hau (Fiona Kemp, Cindy Hemsall, Sam Kemp)
- Ngāti Rehua (Char Ngawaka)

1 Nov 2024 – Tuarua – Scenario testing (Session 1 of 3)

Planning and Resource Consents Department and Chief Sustainability Office

- Matt Gouge (Facilitator / Māori Engagement & Policy Lead)
- Bernadette Papa (Facilitator/ Principal Advisor – Maori Outcomes & Climate)
- Phill Reid ((Manager – Aucklandwide Planning)
- Nicholas Lau (Land and Instability Policy Lead/Notetaker)
- Christopher Turbott (Other Hazards, Volcanoes, Wildfires etc – Policy Lead)
- Lee Ann Lucas (Coastal Erosion and Inundation Policy Lead)

Mana Whenua Representatives

- Ngāti Paoa (Tīpa Compain)
- Ngāti Tamaterā (Eddie Manukau)

- Ngāti Tamaoho (Lucie Rutherford)
- Ngāti Maru (Geoff Cook)
- Te Patukirikiri (Paulette Reidy)

5 Nov 2024 – Tuarua – Scenario testing (Session 2 of 3)

Planning and Resource Consents Department

- Matt Gouge (Facilitator / Māori Engagement & Policy Lead)
- Phill Reid (Auckland wide Planning Manager / Project Sponsor – Natural Hazards Plan change)
- Jacky Bartley (Māori Engagement & Policy Planner / Notetaker)
- Ross Moffat (Natural Hazards Project Manager)
- Nicholas Lau (Land and Instability Policy Lead)
- Christopher Turbott (Other Hazards, Volcanoes, Wildfires etc – Policy Lead)

Mana Whenua Representatives

- Te Ākitai Waiohū (Karen Wilson)
- Ngāti Maru (Craig Solomon)
- Te Āhiwaru Waiohū (Kowhai Olsen) (available till 2:30pm)

7 Nov 2024 – Tuarua – Scenario testing (Session 3 of 3)

Planning and Resource Consents Department

- Matt Gouge Facilitator
- Jacky Bartley - Notetaker
- Phill Reid, Auckland Wide Planning Manager – Project Sponsor
- Nicholas Lau, Senior Policy Planner – Land Instability
- Christopher Turbott, Senior Policy Planner – Other Hazards (Wildfires, Urban Heat events, Volcanoes etc).
- Lee Ann Lucas – Senior Policy Planner – Coastal Hazards (Inundation and Erosion)

Mana Whenua Representatives

- Te Uri o Hau - Fiona Kemp (online) – Taiao Unit – Express disappointment of reading of bill tomorrow not allowing time for our people to hīkoi in response.
- Ngāti Tamaoho – Lucie Rutherford (online) RMA Officer
- Ngāti Tamaterā - Eddie Manukau (in-person)
- Ngāti Paoa - Tipa Compain (in-person)
- Ngāti Maru – Craig Solomon (online)

Attachment C – Status of Treaty Settlements within Tāmaki Makaurau as at 25 November 2024.

Individual hui are planned with all mana whenua at a governance level. The purpose of this engagement is to better understand the individual interests and values of each group and how these might be impacted by the NHPC.

Auckland Council acknowledges that many are still at varying stages of their treaty negotiations or are yet to begin. Upholding the outcomes of treaty settlement legislation and signed deeds of settlement between iwi and the crown is an important consideration.

A te tiriti / treaty settlement is an agreement between the crown and a Māori claimant group's historical claims against the crown. Claimant groups are usually iwi or large hapū (tribes and sub-tribes) that have a long standing historical and cultural association with a particular area.

As of 25 November 2024, within Tāmaki Makaurau, the following groups had completed their individual and collective settlements with a number of settlements still in progress.

In order to support our engagement with PSGEs we have mapped the individual treaty settlements – deed of settlements in the Natural Hazards Consultation Viewer to help each group understand the impact of the natural hazards plan change on their individual treaty settlements. All groups that have treaty settlement legislation have been mapped.

Groups who are at signed deed of settlement stage pending legislation will be added at their request.

Treaty settlement documents can be found online at: [Te Arawhiti - Find a Treaty settlement](#)

Mana whenua group / collective	Deed of settlement	Treaty Settlement legislation
Waikato-Tainui	Deed of settlement signed on 22 May 1995	Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010.
Te Uri o Hau	Deed of settlement signed on 13 December 2000	Te Uri o Hau Claims Settlement Act 2012
Ngāti Manuhiri	Deed of settlement signed on 21 May 2011	Ngāti Manuhiri Claims Settlement Act 2012
Ngāti Whātua o Kaipara	Deed of settlement signed on 9 September 2011	Ngāti Whātua o Kaipara Claims Settlement Act 2013
Ngāti Whātua Ōrākei	Deed of settlement signed on 5 November 2011	Ngāti Whātua Ōrākei Claims Settlement Act 2012
Ngā Mana whenua o Tāmaki Makaurau	Deed of settlement signed on 5 December 2012	Ngā Mana whenua o Tāmaki Makaurau Collective Redress Act 2014
Te Kawerau ā Maki	Deed of settlement signed on 22 February 2014	Te Kawerau ā Maki Claims Settlement Act 2015
Ngāi Tai ki Tāmaki	Deed of settlement signed on 7 November 2015	Ngāi Tai ki Tāmaki Claims Settlement Act 2018

Mana whenua group / collective	Deed of settlement	Treaty Settlement legislation
Ngāti Tamaoho	Deed of settlement signed on 30 April 2017	Ngāti Tamaoho Claims Settlement Act 2018
Te Ākitai Waiohū	Deed of settlement signed 23 December 2020	Awaiting legislation
Ngāti Paoa	Deed of settlement signed 20 March 2021	Awaiting legislation
Pare Hauraki	Collective Redress Deed signed on 2 August 2018.	Awaiting legislation.
Te Patukirikiri	Deed of settlement signed on 7 October 2018	Awaiting legislation
Ngaati Whanaunga	Deed of settlement initialled on 25 August 2017	
Ngāti Maru (Hauraki)	Deed of settlement initialled on 8 September 2017	
Ngāti Tamaterā	Deed of settlement initialled on 20 September 2017	
Ngaati Te Ata Waiohū	Claim not settled at this time	
Ngāti Whātua remaining claims	Agreement in principle to settle remaining claims, including Kaipara Harbour on 18 August 2017.	

Attachment C1 – Replacement Plan Change: Whakarāpopoto August 2025

Replacement Plan Change (Integrated Intensification Plan Change)

Whakarāpopoto August 2025

Matters raised during mana whenua engagement on PC78, natural hazards and on the Replacement Plan Change



1. Purpose

The below table sets out the council team's current understanding of the issues significant to mana whenua as they relate to urban intensification and natural hazard matters.

Due to the legislative time constraints that the Replacement Plan Change is subject to, we have not been able to engage on the full detail of the replacement plan change to the extent we normally would.

The matters set out in the below table are from the following kōrero:

- Our previous engagement on Plan Change 78 including iwi submissions and hearings on that plan change,
- Engagement we have undertaken on natural hazard risks and responses since December 2023,

- Themes that have been raised during the hui we have had so far on the Replacement Plan Change, most recently at hui held on 21 and 22 July 2025

2. Legislative obligations

2.1 Resource Management (Consenting and Other System Changes) Amendment Act 2025¹

The enabling legislation being referred to for the Replacement Plan Change is the Resource Management (Consenting and Other System Changes) Amendment Act which was passed into law on 20 August 2025.

Please note that there is not an option in this process to remain with the Operative Auckland Unitary Plan as it currently is. Part 1 of new schedule 3C of the legislation² sets out the alternative intensification provisions for Auckland. It requires the council to make a decision between retaining Plan Change 78 (PC78) or applying this new Replacement Plan Change (RPC).

2.2 National Policy Statement on Urban Development: Policy 3 for Tier 1 Urban Environments

The term ‘Policy 3 areas’ is an important term used in this summary. This refers to Policy 3 of the National Policy Statement on Urban Development:

Policy 3: In relation to Auckland which is considered a “Tier 1 urban environment”, requires regional policy statements and district plans to enable:

- “(a) *in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and [this part of the policy is outside the scope of the RPC as it has already been completed through PC78]*
- (b) *in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and*
- (c) *building heights of at least 6 storeys within at least a walkable catchment of the following:*

¹ <https://www.legislation.govt.nz/act/public/2025/0041/latest/LMS1014951.htm>

² Resource Management (Consenting and Other System Changes) Amendment Act 2025, Part 1 of New Schedule 3C sets out the alternative intensification provisions for Auckland that must be met: <https://www.legislation.govt.nz/act/public/2025/0041/latest/LMS1014951.html>

- (i) *existing and planned rapid transit stops*
- (ii) *the edge of city centre zones*
- (iii) *the edge of metropolitan centre zones; and*
- (d) *within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.”*

3. What is included in the Replacement Plan Change (RPC)?

Relative to PC78, the draft RPC does the following:

- a. Provides for same capacity as PC78**
 - i. The Plan Change meets a legislative requirement to provide for the same or more capacity for development as PC78 (approximately 2 million additional dwellings).
- b. Natural hazards – down-zoning and tougher rules (including greater recognition of Māori rights and interests)**
 - i. There are stronger controls relating to managing risks from flooding, coastal hazards, landslides and wildfires, including provision being made for the relocation of five identified marae and/or urupā and stronger recognition of Māori rights and interests in managing natural hazard risk.
 - ii. There are changes to the zoning (down-zoning) of approximately 12,000 properties that are at the highest risk from flooding and coastal hazards, e.g. some properties have been down-zoned from zones that enable multi-unit development to Single House Zone.
- c. Medium Density Standards replaced**
 - i. Medium Density Residential Standards, that previously enabled three-dwellings per site up to three stories in height, have been replaced with different/improved standards.

d. Walkable Catchments – taller buildings enabled in 44 walkable catchments

- i. Building heights of up to 10 storeys are generally enabled in 23 walkable catchments around Rapid Transit Stops, except where qualifying matters apply³.
- ii. Building heights of up to 15 storeys are generally enabled in 21 walkable catchments around Rapid Transit Stops, except where qualifying matters apply.
- iii. Outside of walkable catchments, building height controls for most of the Terrace Housing and Apartment Buildings zone are increased to enable buildings of six storeys (up from five storeys), with a more permissive height in relation to boundary control.
- iv. The area of land zoned for Terrace Housing and Apartment Buildings zone around 14 town centres is increased (within generally 200 metres to 400 metres of the edge of the town centre).
- v. The area of land around 11 additional town centres and local centres is zoned for Terrace Housing and Apartments Buildings zone (within generally 200 metres of the edge of the town centre or local centre).

e. Corridors – taller buildings enabled along 24 frequent transport corridors

- i. Sites within approximately 200 metres either side of 24 corridors on Auckland Transport's Frequent Transport Network is zoned Terrace Housing and Apartment Buildings zone.

f. Residential zoning – changed proportion of zones

- i. There is an increase in the amount of land zoned for two-storey medium density housing (Residential – Mixed Housing Suburban Zone).
- ii. There is a reduction in the amount of land zoned for three-storey medium density housing (the Residential – Mixed Housing Urban Zone).

g. Qualifying matters – new coastal environment, less special character around three train stations

Qualifying matters are matters which make more intensive development inappropriate in a certain location or area⁴. They protect things like cultural heritage, viewshafts and indigenous biodiversity.

- i. To give effect to the New Zealand Coastal Policy Statement and the Regional Policy Statement, a new qualifying matter has been applied to a small number of walkable catchments and NPS-UD policy 3(d) locations to make the building heights or density requirements less enabling of development.

³ Resource Management (Consenting and Other System Changes) Amendment Act 2025, Part 1, Clause 8(1)-(6) of New Schedule 3C sets out the Qualifying matters for the Auckland housing planning instrument: <https://www.legislation.govt.nz/act/public/2025/0041/latest/LMS1014951.html>

⁴ RMA – section 77I and 77O

- ii. Removing areas of special character that are currently identified in the Auckland Unitary Plan, in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland and Morningside.
- h. **Light rail corridor included**
 - i. Intensification requirements have been applied to the previously excluded Auckland Light Rail Corridor, to give effect to policies 3 and 4 of the National Policy Statement on Urban Development (NPS-UD) and the specific intensification requirements set out in the RMA for increased buildings heights in the walkable catchments around the rail stations at Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Ave and Mount Albert; except where qualifying matters apply.

3. What is not included in the Replacement Plan Change (RPC)?

- The city centre is not part of the Replacement Plan Change as this has already been heard and decided through Plan Change 78.
- The RPC primarily applies the National Policy Statement on Urban Development which is only within the urban parts of Auckland. In the rural areas, it responds only to natural hazard risks
- Most of the RPC provisions do not apply to the Hauraki Gulf Islands, however there is one regional rule that applies throughout the whole region requiring re-builds of materially damaged or destroyed buildings in natural hazard areas to demonstrate that the natural hazard risk is reduced to a tolerable or acceptable level, or otherwise reduced to as low as is reasonably practicable.

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
Plan Change 78 related matters				
Walkable catchments – catering for less able whanau members	Concern about accessibility, equity and well-being - that many people, including Māori, will not be able to walk the distances used for walkable catchments e.g. less able bodied people, large families with lots of kids and multiple jobs etc (will not get the benefits, rather will be disadvantaged). This is related to transport and a lack of parking and congestion making accessibility difficult.	The walkable catchments remain in the new legislation and are set at the same distance for the Replacement Plan Change (RPC) as for PC78. They set a distance for greater residential and business intensification around centres and rapid transit stops. Parking requirements for residences are not influenced by walkable catchments. The government required that council remove all the minimum parking requirements in the AUP, and this was done through Plan Change 71 which has been operative since November 2023.	The same catchment distances apply as for PC78 – 800m (10mins) from the edge of metro centres and rapid transit stops and 1,200m (15mins) from the edge of the city centre. The walkable catchments are based on an ‘average’ of what people will walk. For instance, some athletic people could walk a lot further than 800m for a train station, while others with limited mobility would struggle with under half of that. The distance has therefore been set as a mid-range. The distances also take into account steep slopes and busy road crossings which may reduce the distance that could be covered in 10 mins.	RPC Planning Maps (Walkable Catchment Management Layer)

What areas are exempt from intensification? Limit intensification in remote areas with limited infrastructure to support growth.	Concern was raised in PC78 about where intensification was being applied. Remote areas have limited ability to accommodate growth and intensification in these areas may result in poor environmental and cultural outcomes (such as around Clevedon and Kawakawa Bay)	A fundamental difference between PC78 and the RPC is that the RPC provides council with a lot more control on where growth should be enabled. Under the new legislation, council has much more discretion in where to provide for growth (and where to discourage it) provided it meets Policy 3 of the NPS-UD which directs intensification around rapid transit stops and centres. There is a requirement in the legislation that the RPC contains the same overall development capacity as PC78 did – for around 2 million additional dwellings. The legislation specifically directs us to enable more building height in some specific locations. These places are Maungawhau, Kingsland and Morningside train stations, as well as Baldwin Avenue and Mt Albert train stations.	The RPC allows the council to focus growth in areas that best accommodate it from a transport and infrastructure perspective. We are proposing to remove the blanket Medium Density Residential Standards and plan for more growth around Auckland's 66 walkable catchments, 57 smaller centres as well as long major transport corridors. We are not proposing growth in remote areas.	RPC Planning Maps (zones)
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Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		There are 92 rural and coastal settlements in the region, of which only three will have some zoning for intensification applied. These are Waiuku, Pukekohe, and Warkworth.		
What Qualifying Matters are being applied and how?	Where qualifying matters are present, they justify a lower level of development than would otherwise be enabled. They only apply as 'qualifying matters' in Policy 3 areas which are around centres and around rapid transit stops as the council is otherwise required to intensify these areas. Outside of the Policy 3 areas, they still work to limit development intensity but are not technically 'qualifying matters' as council is not specifically directed to intensify in those locations. An example would be volcanic viewshafts which limit the	Qualifying matters still apply in the RPC. While technically, they only apply to areas where the council is specifically directed to enable height, they also apply restrictions outside these areas and can result in lower density zoning or other restrictions. Sites and Places of Significance to Mana Whenua remains a qualifying matter. It works to retain a lower density zoning on two residential sites which are scheduled urupā, and also regulates activities on all scheduled sites which may affect height and density.	Qualifying matters are still proposed to ensure intensification does not occur in inappropriate locations. The total list of qualifying matters is: • Sites and Places of Significance to Mana Whenua • Outstanding Natural Character, High Natural Character • Waitakere Ranges • Maunga Viewshafts and Height Sensitive Areas • Significant Ecological Areas	RPC Planning Maps, Overlays in Chapter D, Designations Chapter K, residential zones Chapter H two additional QMs – Coastal setback and Lake Pupuke yard (provisions to be confirmed)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	building heights that could otherwise be built up to on a site.	Auckland's QMs have been refined to specifically address additional height and density proposed in Policy 3(c) and 3(d) areas. In some cases, this has meant that some QMs will only be overlays because their application is outside those areas e.g. Outstanding Natural Character and High Natural Character, Wetlands, and Ridgeline Protection overlay areas. These overlays will continue to apply in the Plan but are no longer 'classified' as QMs	• Outstanding Natural Landscapes/Outstanding Natural Features • Open Space • Natural Hazards • Notable Trees • Historic Heritage • Designations • Special character residential and business • Auckland Museum viewshaft • Stockade Hill viewshaft • Local public views • Combined wastewater network control – being addressed in residential chapters • Coastal setback (Coastal Environment) • Lake Pupuke yard • National Grid • Aircraft Noise Overlay	

How will the increased demand for stormwater disposal, drinking water and wastewater disposal be managed?	With additional growth comes more demand on these services which has the potential to result in service failures, overflows and a demand for drinking water from outside the region. What is the effect on the Waikato River (vision and strategy)	The adequacy of existing 3 waters (wastewater, stormwater and drinking water) infrastructure and the cost and affordability of upgrading this infrastructure to cope with additional growth and intensification is an issue faced by the AUP, PC78 and the RPC. The AUP did not put in place any general mechanism to match housing demand with infrastructure supply (although various techniques are contained in specific precincts). PC78 proposed a number of areas where density increases were constrained (the MDRS could not be taken up) due to the timing of bulk water and wastewater infrastructure upgrades as identified in Watercare's asset management plans.	For the RPC, Watercare have sought that the combined wastewater control applies as a qualifying matter to sites in areas with combined wastewater networks (i.e. the inner Isthmus). This control requires an assessment of the effect that development on a site will have on the network's capacity. The qualifying matter recognises that stormwater separation / sewer connections to the Central Interceptor may be in place in the future, at the time of development of some sites, but that this requires assessment closer to the time when the development of the site is proposed Instead of including a qualifying matter to apply to other sites for where there are water or wastewater capacity issues across Auckland, Watercare has asked that as part of the RPC the residential zones objective and policies are amended and new	Chapter H Residential Zones
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Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		The sites subject to those capacity constraints identified in PC78 were located in: • Hibiscus Coast • Upper East Coast Bays • Beach Haven • Lower North Shore • Henderson-Massey • Howick - Pakuranga • Beachlands • Waiuku. In addition to these control areas, PC78 also identified an Infrastructure – Combined Wastewater Network Control areas. This applied to residential sites connected to the combined wastewater network managed by Watercare that also receives stormwater from sites and roads	provisions included to ensure that assessment of water and wastewater capacity is part of a resource consent process. Watercare are looking to place more emphasis on developers being aware that Watercare is constantly updating information about capacity as new development connects to its infrastructure and places pressure on areas subject to constraints and is encouraging early dialogue with developers. For example, to facilitate this early awareness Watercare have published a map showing areas across Auckland with constraints and potential timing of upgrades Watercare retain the ability to refuse service connections for new development which will likely impact on the ability to	

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		The control recognised capacity constraints and that these networks have in discrete areas across Auckland. In these areas, there is generally no ability for individual sites to connect to an existing separated local stormwater pipe that is part of the public stormwater network. Enabling development in these locations has the potential to cause the relevant combined wastewater network to become overloaded, resulting in increased wastewater overflow events, often at times of heavy rain events, when areas are also flooded.	consent new development problem areas. With respect to effects on the Waikato River and giving effect to Te Ture Whaimana o Te Awa o Waikato—the Vision and Strategy for the Waikato River, Watercare will use the consents they have in place. This is both to take water from the river and discharge treated wastewater to the river to their maximum limits. There will be no effect other than what is already known and has been discussed. To accommodate further growth, Watercare will need to consider all options for water supply and wastewater discharge as they normally would through extensive consultation and consenting processes.	

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			The Waikato River will remain on the list of options however it is unlikely to be their preferred option due to the commitments they have already made to mana whenua	
How is transport/parking being managed so people can access their houses?	Transport and a lack of on-site parking was raised as a concern on several occasions by Mana Whenua representatives during PC78. An overall increase in congestion and diminished ability for whānau to move around are issues.	Legislation removed any discretion for council to require on-site parking. A complementary Transport Plan Change (Plan Change 79), which occurred at the same time as PC78, included some matters to address the concerns of Mana Whenua. These included a requirement for accessible parking and additional on-site loading spaces which can be used as pick-up and drop-off points for residents requiring this vehicle access. There were also improvements to private accessways to enhance pedestrian safety.	The approach to the RPC is to focus growth in centres and around transport corridors which allow ready access to the transport network. It removes the Medium Density Residential Standards which made it difficult to plan for transport. Removing the MDRS should facilitate better network planning (upgrades to roads etc) to more effectively manage congestion. Council is still not permitted to impose on-site parking standards.	RPC Planning Maps

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		Plan Change 79 (PC79) is currently under appeal but good progress has been made in resolving the appeals and it is anticipated they will be settled within the coming month and PC79 made operative by the end of 2025.		
How are maunga protected from intensification?	All iwi who attended the PC78 engagement supported the retention of maunga viewshafts and recognise them as section 6(e) RMA matters. Mana whenua representatives understood the added pressure the viewshafts through the city centre are under from development and support their retention. The ability to recognise the cultural landscape is culturally important.	As with PC78, the recommended response is to retain all volcanic viewshafts at current locations and heights. It is also recommended to retain all height sensitive areas in their current locations. Where these height sensitive areas are in walkable catchment and are zoned as Terrace Housing and Apartment Building, they are being rezoned to Mixed Housing Urban zone to avoid setting up an inappropriate tension between what the zone could enable and what can actually be built taking into account the overlay	The protection of all 79 maunga viewshafts remains important to the urban fabric of Tāmaki Makaurau and are recognised for their cultural significance. It is expected that some viewshafts will come under significant challenge through the RPC hearing process. These will include viewshafts to Maungawhau (Mt Eden) across the central city. The staff recommendation is for the protections to be retained.	RPC Planning Maps and Chapter D

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	Some iwi requested no development (exclusion zone) at the lowest contour of the maunga.	protections. This amended zoning is not shown on the viewer yet. In addition, no intensification of public open space is proposed in the RPC. This offers protection around the base of maunga on publicly owned open space land.		
How is the coastline and sensitive ecology in the coastal area being protected?	Some mana whenua representatives expressed concern through PC78 about development occurring in the coastal environment. Degrading the coastal character, increased erosion, sea-level rise, and encountering cultural artefacts (including kōiwi) have been cited as reasons for concern.	The RPC has more scope than PC78 to respond to the coastal environment. Significant ecological areas (protected indigenous vegetation) remain proposed to be qualifying matters, and a Coastal setback (Coastal environment) qualifying matter is proposed to restrict building height within 100m of the coastline to protect the character of that environment. The natural hazard provisions of the plan are proposed to be significantly enhanced to	The RPC proposes significantly more recognition of mana whenua values and interests and iwi involvement in consenting processes in the coastal environment.	Chapter E36 (Natural Hazards) Coastal setback QM (provisions to be confirmed)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		recognise the cultural significance of the coastal area. These responses includes a requirement to consider mana whenua values and associations when proposing hazard mitigation in the coastal environment, a preference for nature based solutions (soft infrastructure) over hard protection works, and the application of lower density zoning in some hazard areas. More detail of this is provided in the next section of this table.		

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
How will the relationship between the NPS-UD and other matters like the National Policy Statement for Freshwater Management (NPS-FM) be managed?	We have heard from mana whenua that there is a need to think holistically about urban development and the health and wellbeing of the natural environment. Te mana and te mauri o te wai are important and interrelated considerations when intensifying the urban area.	Currently, the primary work being undertaken for freshwater matters is under the National Policy Statement for Freshwater Management. The government is in the process of changing how freshwater is managed and this will form part of the Phase 3 RMA reforms to be announced later this year.	The RPC contains some urban design features for managing the use of freshwater. These include the use of deep soil and canopy tree planting and regulating areas of impermeable space so designs manage water effectively. The RPC does not contain a catchment level response to the management of freshwater, as this is intended to be addressed by the NPS-FM. The existing AUP protections around the management of freshwater remain.	Chapter E Auckland-wide provisions for water, stormwater Chapter H Residential Zones
What is the approach to scheduled sites and places of significance to mana whenua. Concern about urban intensification of scheduled urupā sites.	During PC78 we heard that we should not encourage development of scheduled urupā. Their tapu nature is not compatible with residential activities. Avoid effects on sites of significance such as surface	While the RPC changes the pattern of urban intensification, it does seek to upzone some scheduled urupā sites. The Sites and Places of Significance to Mana Whenua overlay remains proposed as a qualifying matter which two	The one scheduled urupā site proposed to be upzoned is the St James Anglican Church in Church St, Māngere Bridge. Upzoning is not opposed as this site is both Māori Land (under Te Ture Whenua Māori Land Act	

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	flooding, blocking access, views, removal of vegetation, discharges. General agreement that already developed sites, such as those under existing buildings and roads can be intensified as required (city centre sites is an example).	residential sites being held at their operative Residential – Single House Zone. Two other scheduled urupā are proposed to retain their existing zoning or be upzoned, however site specific circumstances exist.	1993) and a sanctified site of the Anglican Church. Discussions with church officials has confirmed that redevelopment for residential activities is unlikely with the site existing in this location since the 1850's. In the unlikely event that the church is proposed to be relocated, both European rites and Māori tikanga would be followed.	
What is the approach to non-scheduled sites and places of significance?	Protect known but as yet unscheduled sites of cultural significance from intensification. During PC78, several sites have been identified as being of concern – Pararēkau Island (Pahurehure Inlet), views from Pukekiwiriki Pā (Papakura), Te Uru Tapu (Takapuna), Pukekohe Hill (Pukekohe), Te Maketu Pā,	The concentration of urban intensification around centres means that more intensive zoning is no longer proposed around some unscheduled sites. Pararēkau Island will remain as Residential - Single House Zone and Pukekiwiriki Pā is to be retained at its currently operative Mixed Housing Suburban Zone. There is no change to the zoning for	The RPC provides more ability to respond to natural hazards than PC78. The natural hazard related plan provisions include the recognition and protection of both scheduled and unscheduled Māori Cultural Heritage. There are not currently specific qualifying matters proposed	RPC Planning Maps, Chapter E36 Natural hazards.

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	Karearea Pā, Tuhihata Pā, Te Maunu a Tu.	Pukekohe Hill, nor for Te Uru Tapu (noting that a Coastal setback qualifying matter is also proposed to limit building height in that location). The remainder of the sites listed are not within the urban area so are not subject to intensification under the RPC.	specifically to address unscheduled mana whenua cultural heritage sites however the scheduling under the Māori Cultural Heritage Programme is ongoing. No scheduling of new sites and places of significance to mana whenua is proposed in the RPC.	
Significant Ecological Areas, Outstanding Natural Features, Outstanding Natural Landscapes, Outstanding Natural Character Areas, High Natural Character Areas, Ridgeline Protection Areas.	During PC78, mana whenua supported protection of these areas as important components of the cultural landscape. They sought to avoid boundary effects on SEAs. Mana whenua supported the application of lower density zones to avoid degradation of these sites and features.	An issue with PC78 was the application of Medium Density Residential Standards which required more enabling provisions in all relevant residential zones (unless a QM applied). The RPC is different in that it allows the council more choice on where to enable development, so sensitive features like Outstanding Natural Features and Significant Ecological Areas are managed to	As was the case for PC78, these remain as qualifying matters (in Policy 3 areas) and more broadly as overlay controls within the plan which manage height and density. The flexibility the council now has around the zoning allows for a retention of the currently operative zoning where these features could be adversely affected by development	RPC Planning Maps. Chapter D Overlays

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		not be subject to the adverse effects of intensification. Where more than 30% of a site is SEA, it is downzoned to SHZ		
How will Special Character be managed?	The Special Character Areas Overlay – Residential and General maintains and enhances the special character values of specific residential and business areas identified as having collective and cohesive values, importance, relevance and interest to the communities within the locality and wider Auckland region. The areas identified include older established suburbs (or parts of suburbs) that represent the early European settlement of Auckland. It does not recognise and protect Māori settlement.	The extent of special character protection in Tāmaki Makaurau is proposed to be reduced from that proposed in PC78 around some train stations explicitly referred to in legislation. These are Maungawhau (Mount Eden), Kingsland and Morningside train stations	The RPC proposes a reduction in Special Character protection in locations around Maungawhau (Mount Eden), Kingsland and Morningside train stations.	RPC Planning Maps. Chapter D18 Special Character Areas Overlay

What is the council position on the Waitakere Ranges Heritage Area?	The Waitakere Ranges Heritage Area Act 2002 recognises the area as a place of particular cultural significance to Te Kawerau ā Maki and Ngāti Whātua. Support, particularly from Te Kawerau ā Maki, of retaining the existing protections and addressing boundary effects along the full length of the heritage area.	As with PC78, the protections for the Waitakere Ranges Heritage Area will continue to apply to manage development in the area. There is approximately 24km of boundary between the urban area and the WRHA. There are a small number of sites that are in the Waitakere Ranges Heritage Area and also inside the rural urban boundary, mostly located in the Henderson Valley. These sites are remaining lower density zones (MHS or single house zone). They are in an urban area and so need an urban zone, while maintaining a density that reflects that values of the heritage area. Otherwise the residential properties next to the heritage area are proposed to be zoned predominantly Mixed Housing Urban.	The Waitakere Ranges Heritage Area is proposed to be protected from intensification. Apart from lower density zoning proposed within the heritage area, lower intensity zoning is generally not proposed for sites adjacent to the heritage area.	RPC Planning Maps, Chapter D12 Waitakere Ranges Heritage Area
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Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
How will open space be managed for a growing population?	The ability to connect with Te Taiao and undertake recreation is important for a growing city	As with PC78, public open space is its own qualifying matter so it is proposed to be protected from urban intensification. The protection of public open space is still considered important in the RPC.	Public open space is still proposed to be protected in the RPC.	RPC Planning Maps. Chapter H Open Space Zones
What is the approach with culturally sensitive precincts such as Ihumātao?	Some precincts contain specific provisions to recognise the cultural significance of these areas. Examples include the Mangere Gateway Sub-Precinct E which includes ancestral Ihumātao land adjacent to Ōtuataua Stonefields Historic Reserve.	The Ihumātao land is currently zoned as a mix of open space land, Mixed Housing Suburban and Green Infrastructure Corridor. PC78 did not propose any changes to the plan provisions applying to this site. This was in recognition of its cultural significance and the discussions occurring between iwi and the government as to its future use. This approach remains in the RPC. There is no proposal to change any of the planning provisions associated with this site.	All of the precincts within the urban environment have been reviewed by the council team and no changes are proposed to precincts which address cultural matters.	RPC Planning Maps, Chapter I Precincts

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
How is Right of First Refusal land being addressed by the RPC?	Recognising that RFR land is an important part of Treaty settlements. Intensification on RFR land may affect the future acquisition of sites by settled iwi authorities.	While not explicitly raised during the PC78 discussions, it is of relevance to that plan change and to the RPC.	While some RFR sites have been discussed during work on the natural hazards plan change, there has not been the opportunity to discuss these sites with respect to the wider RPC. There is no response proposed for these sites beyond what is currently in the AUP.	RPC Planning Maps. Chapter J Definitions
Is council proposing to rezone non-residential land to residential zone through this plan change?	This was raised in PC78 specifically with respect to Future Urban Zone land and, in one case, rezoning from Business zone to Residential zone as part of Treaty settlement discussions with the government.	The same principle as PC78 applies. Future Urban Zone land is not being rezoned through the RPC. While some residential and business land will be zoned for more intensification, there is no proposal to rezone business land to residential (and vice versa).	There is no proposal to rezone from non-residential to residential through this plan change.	RPC Planning Maps
Avoid negative impacts on established cultural activities/facilities (such as marae).	The intensification of activities adjacent to marae and other cultural facilities may have adverse effects on those sites. This could include overlooking from high buildings, or more	This was a matter spoken about with several marae during the development of PC78. Te Mahurehure Marae for example	Now that the areas of residential and business intensification are better understood, the council team are working to identify any issues and possibly address this	TBC

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	intense residential activities adjacent to marae sites.	was identified as being possibly affected by intensification. It is a valid concern for the RPC which proposes more intensive height and density next to some established marae.	through the residential and business provisions.	
Maintain access to coasts and rivers for cultural activities (such as waka launching, mahinga kai).	It is important for mana whenua and Māori more generally to access the coast and rivers to undertake cultural activities.	Access to the coast remains an important right for people under the RPC, as was under PC78 and is under the currently operative Auckland Unitary Plan.	Access to these spaces is provided via public open space, esplanade strips and reserves, easements etc. The council team does not propose any changes to these spaces and arrangements in the RPC.	RPC Planning Maps and Chapter H Open Space zones
How do smaller sites provide for on-site mitigation? Concern about cross-boundary effects where one site affects another (such as stormwater discharge)	An inability to appropriately deal with on site effects may result in cumulatively larger environmental effects affecting awa, whenua and the moana.	Under PC78, the medium density residential standards removed minimum lot sizes for subdivision. This enabled the creation of very small residential sites. The RPC addresses this by allowing council to retain standards for subdivision requiring a minimum site area.	The RPC retains council's ability to set minimum site sizes to avoid cross-boundary effects. In addition, council still retains the ability to manage things like maximum impervious area on sites to ensure there is sufficient ground soakage. Regional controls remain to regulate discharges into water, the	Chapter E38 Urban Subdivision Chapters E2, E3, E5, E8.

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			coastal environment, and onto land.	
Papakāinga provisions in the residential zones and rural zones	An ability to development traditional Māori housing developments is important in an intensifying city.	PC78 provided for more intensive development across much of the city through the Medium Density Residential Standards, which generally allowed for three dwellings of three storeys across a majority of the lower density residential zones. The RPC provides for more targeted urban intensification, focussed on centres, rapid transport corridors and certain other road corridors. It does not enable intensification over such a large part of the urban environment which may in turn affect the ability to develop communal housing on some residential lots.	In the RPC, Māori Land, Treaty Settlement Land and the Special Purpose – Māori Purpose Zone continue to provide for higher numbers of dwellings as a permitted activity. In rural zones there currently remains a density requirement of one dwelling per hectare. As part of the government Phase 2 RMA reforms, it is proposed that the National Environmental Standard on Papakāinga will set a national definition for papakāinga and introduce more enabling provisions on Ancestral Māori Land (which includes Māori Land) and Treaty Settlement. The RPC is focussed on implementing the National	RPC Planning Maps. Chapters E20 and E21. Chapter H27 Māori Purpose Zone.

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			Policy Statement on Urban Development which applies within the urban environment. Within the rural area, the RPC is addressing natural hazards only.	
Are there any changes to the Special Purpose – Māori Purpose Zone?	The Special Purpose – Māori Purpose Zone recognises and enables māori cultural activities on general title sites. Many marae on council-owned sites are zoned as Māori Purpose Zone	PC78 did not propose any changes to the Māori Purpose Zone, in part because we heard that this may have unintended consequences for some iwi. No changes are currently proposed through the RPC.	There are no changes currently proposed to the Māori Purpose Zone although, as discussed earlier, we are looking at addressing the potential for intensification adjacent to these sites to be an issue for the Māori Purpose Zone	Chapter H27 Māori Purpose Zone
Natural Hazards				
What is the difference in approach for hazard management in PC78 and the RPC	Following the Auckland Anniversary and Cyclone Gabrielle weather events in early 2023, responding to natural hazards has been a particular concern for both council and the community	The way in which natural hazards are being addressed in the RPC is very different from PC78. PC78 identified the natural hazard provisions as qualifying matters, which was limited as it could not impose controls or zoning which was more stringent than the operative plan.	The RPC is a much more comprehensive response to hazard management than what is in PC78 (or in the currently operative AUP).	RPC Planning Maps Chapters B2, B9, B10 (Regional Policy Statement) Chapter E36 (Natural Hazards), E38 and E39 (Urban and Rural Subdivision)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
		The RPC proposes a new approach to natural hazard management including downzoning of 12,000 most at-risk properties, more stringent and detailed controls, greater recognition of mana whenua cultural heritage, values and associations, and new requirements to rebuild back better.		
Having a co-ordinated, integrated approach to managing hazards. Comprehensive hazard planning including funding Holistic approach to managing hazards –Te Ora ō Tāmaki Makaurau. Regulating land use cumulatively contributing to hazards	The ability to achieve effective change requires a co-ordinated approach.	This was not something that was within scope of PC78	Auckland Council is improving the co-ordination of its workstreams. Related workstreams include infrastructure provision, Healthy Waters (Making Space for Water), Marae and Infrastructure Funding, Community Adaption Planning and Auckland Emergency Management. The Council is actively working on co-ordinating its identification of hazard risks and	RPC Planning Maps Chapters B2, B9, B10 (Regional Policy Statement) Chapter E36 (Natural Hazards), E38 and E39 (Urban and Rural Subdivision)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			the range of regulatory and non-regulatory functions it is undertaking (the RPC process is a regulatory process). The RPC provisions contain reference to current and future plans and strategies, such as the Shoreline Adaptation Plans, so that that plan change and consenting processes can consider these when making recommendations and decisions. This is expected to improve co-ordination, holistic consideration of natural hazard risk, and the consideration of cumulative effects over time.	
Stronger ability for planners to say 'no' to development	A vast majority of resource consents get approved (with conditions). An ability to decline consents is important where activities result in Significant Natural Hazard Risk.	This was not something that was within scope of PC78 as the plan change did not have the legal ability to make the provisions more stringent than those in the operative unitary plan.	The RPC significantly strengthens council's ability to decline consent applications and plan changes. The provisions are much more directive and activity statuses allow significantly more discretion for planners to seek further	Chapter B10 Environmental Risk (Regional Policy Statement) Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			information, mitigation or to recommend declining inappropriate consents and plan changes.	
Greater awareness of the risks to people and communities needs to be understood before new development occurs	Developing land in areas prone to flooding, landslides, or coastal erosion puts people at greater risk when extreme weather events occur. Infrastructure damage and displacement of people during extreme weather events often occurs.	This was not something that was within scope of PC78.	The RPC will provide further policies to consider the effects of subdivision, use and development in areas with natural hazard risks, including risk to people and impacts on the environment.	Chapter B10 Environmental Risk (Regional Policy Statement) Chapter E36 (Natural Hazards)
Recognise the importance of mātauranga as triggers for hazard response	Current provisions do not reflect the depth of cultural association, the nature of mana whenua responsibilities, or the realities of vulnerability faced by mana whenua communities. This understanding must be integrated into hazard planning to ensure cultural values and identity are not eroded over time.	This was not something that was within scope of PC78	The RPC includes new policies that provide for the active participation of Māori in identification and decision-making over the management of natural hazard risks associated with their values rights and interests, and requires risk assessments to consider mātauranga and tikanga Māori.	Chapter B10 Environmental Risk (Regional Policy Statement) Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
Recognise that it is not possible for mana whenua to categorise levels of risk and tolerance on their cultural values as every situation is different. Provide flexibility in the plan to consider mātauranga and tikanga.	Iwi emphasised the need for the consideration of localised and tikanga based responses to risk, in a way that upholds their ability to uphold their ancestral connections, values, rights and interests associated with their ancestral lands, water, wahi tapū, taonga, traditions and practices as a matter of national importance in accordance with section 6(e) of the RMA.	This was not something that was within scope of PC78.	Under the RPC, all activities that require consent in natural hazard areas will need to undertake a natural hazard risk assessment that includes assessment of cultural impacts and whether natural hazard risks for Māori land, Treaty settlement land, marae, urupā, mana whenua cultural heritage and values can be reduced. These will need to consider any relevant management plan, strategy or hazard risk assessment relating to an area. This will include Shoreline Adaptation Plans and other documents to which mana whenua have contributed. The need to consider environmental and cultural impacts will create further opportunity for mana whenua resource management practitioners to develop	Chapter B10 Environmental Risk (Regional Policy Statement) Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			conditions at the level of an individual place.	
Depletion of aquifers. Resilience of drinking water and water for fire fighting	Severe weather can undermine existing wastewater and water collection systems and also create droughts that stress groundwater resources and exacerbate allocation issues. These risks combined with additional housing capacity provided by the RPC may have unintended impacts on the region's water supply	This was not something that was within scope of PC78.	The RPC does not include changes to provisions for water allocation, which are included in Chapter E2 and E7. There is an opportunity for mana whenua and Auckland Council to work together on appropriate provisions (including for water conservation measures) as part of the AUP 2.0 workstream (full review of the Auckland Unitary Plan proposed to begin in 2026).	NA
Iwi involvement in Emergency Management responses. Transfers of powers to iwi authorities to support civil defence responses.	Iwi Authorities provide essential support services to people impacted by natural disasters and extreme weather events, supporting displaced people in emergencies.	This was not something that was within scope of PC78.	How iwi work with council in Emergency Management responses and the transfer of certain powers to iwi during those times is outside the scope of this Plan Change but could be explored through separate council Emergency Management processes.	NA

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
Marae should be enabled to act as emergency centres (should they wish to)	Marae and Māori organisations provide essential support services to people impacted by natural disasters and extreme weather events, supporting displaced people in emergencies.	This was not something that was within scope of PC78.	Further funding and support for the civil defence/emergency management role of marae is sometimes available through the National Environmental Management Agency. The council supports more investment in partnerships that enable marae to serve their communities in this way.	NA
Kōiwi and other sensitive material exposed through natural hazard processes	Many marae and urupā are situated near rivers or low-lying areas, making them vulnerable to flooding. This can lead to damage displacement, and loss of cultural heritage. Flooding and sea-level rise can restrict access of whānau to wāhi tapū and significant areas that are important for cultural practices.	This was not something that was within scope of PC78.	While the Accidental Discovery Protocol in Chapters E11/E12 of the AUP is only triggered by activities that plan users undertake (rather than acts of nature) the protocol provides a useful basis for an agreed approach between Council, mana whenua, and Heritage New Zealand Pouhere Taonga. Chapter B10 includes a new policy that enables Integrated Māori Development on Māori land, Treaty Settlement Land, and land held in general title	Chapter B10 (Environmental Risks) Chapter E36 Natural Hazards Chapter E39 Rural Subdivision Chapter J Definitions

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			identified as receiver sites for managed retreat through a range of processes, including spatial planning, Māori adaptation plans, plan changes, zoning, precincts and a newly defined “Te Wāhi Hunuku subdivision.” This last method is provided for at a more detailed level in Chapter E39. Additionally, Auckland Council and mana whenua will need to work together on whether and how re-interment of kōiwi could occur on open space or other Council-owned land. The AUP regulates the establishment of urupā on the basis of potential effects on the environment and/or on neighbouring property. Matters such as public access, fencing, and long-term use of reserve land is regulated under the Reserves Act.	

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
Protection of Mana Whenua cultural heritage – scheduled and unscheduled Use of alert layers / silent files to identify high risk areas of accidental discovery – improved rules in plan for protection of unscheduled sites.	Cultural heritage is woven into the whenua, awa and maunga that define mana whenua identity and traditions. Wāhi tapu, urupā, marae and ancestral landscapes are under threat from natural hazards and urban expansion.	This was not something that was within scope of PC78.	The Council has acknowledged Schedule 12 is not complete and that many places identified by mana whenua are not included. While changes to Schedule 12 are out of scope for the RPC, the council has explicitly included effects on mana whenua cultural heritage and values in assessments of activities regulated in chapter E36. This enables mana whenua to identify where their sites of significance are impacted even where they are not in Schedule 12. The AUP definition of mana whenua cultural heritage includes Māori cultural landscapes and has been amended to be more explicit that it applies to both scheduled and unscheduled sites.	Chapter E36 (Natural Hazards) Chapter J1 - Definitions

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			Better implementation of the AUP could involve initial screening by processing planners of applications against a non-statutory alert layer containing Treaty settlement, Māori land, marae, and cultural heritage sites. Mana whenua have an ongoing opportunity to co-design alert layers depicting their cultural heritage through the Māori Cultural Heritage Programme.	
Managing cross boundary hazard responses – Waikato Regional Council. Northland Regional Council.	A lack of alignment results in different rules for Māori land and effects on cultural values across regional plan boundaries.	This was not something that was in scope of PC78.	The council team investigated options for improving consistency of the Māori Land rules in response to Natural Hazards, particularly where Marae, papakāinga and urupā may need to relocate. It was considered that the proposed NES Papakāinga will provide that consistency and will require councils to apply the NES Papakāinga as soon as it	NA

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			takes effect later this year as part of the wider package of RM Reforms.	
Protection of marae and urupā, and relocation if necessary.	Many marae and urupā (burial grounds) are situated near rivers or low-lying areas, making them vulnerable to flooding and other natural hazards.	This was not something that was within scope of PC78.	All activities that require consent in natural hazard areas will need to undertake a natural hazard risk assessment that includes assessment of cultural impacts and whether natural hazard risks for Māori land, Treaty settlement land, marae, urupā, mana whenua cultural heritage and values can be reduced. New policies in E36 regulate the provision of hard infrastructure to address natural hazards, including an allowance for hard protection to be considered to protect mana whenua cultural heritage and values or to provide for continued use and access to Māori land, Treaty settlement land, marae or	Chapter B10 (Environmental risk) Chapter E36 (Natural Hazards) Chapter E39 (Subdivision – Rural) Chapter J1 Definitions

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			urupā, where nature-based solutions are not feasible. The RPC provides for managed retreat and special policies for use and development of marae while managing natural hazard risks. Chapter B10 includes a new policy that enables Integrated Māori Development on Māori land, Treaty Settlement Land, and land held in general title identified as receiver sites for managed retreat through a range of processes, including spatial planning, Māori adaptation plans, plan changes, zoning, precincts and a newly defined “Te Wāhi Hunuku subdivision.” This last method is provided for at a more detailed level in Chapter E39. We have updated the definition of Māori Land in Chapter J1 to	

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			better recognise the different types of Māori land in Tāmaki Makaurau.	
Engaging with haukāinga and iwi communities on matters affecting them, not only iwi authorities	It is important to recognise the different Māori interests that may be impacted by natural hazards and ensure they are able to be engaged on decisions that impact them e.g., Māori communities, marae, urupā, papakāinga.	This is relevant to PC 78. Feedback from Māori engagement is discussed above and has informed the planning response for PC78.	Enhanced engagement was undertaken with affected marae and haukāinga as part of the Natural Hazards Plan Change. Chapter B10 includes a new policy that enables Integrated Māori Development on Māori land, Treaty Settlement Land, and land held in general title identified as receiver sites for managed retreat through a range of processes, including spatial planning, Māori adaptation plans, plan changes, zoning, precincts and a newly defined “Te Wāhi Hunuku subdivision.” This last method is provided for at a more detailed level in Chapter E39.	B10 Environmental Risk (Regional Policy Statement) E36 Natural Hazards E39 Rural Subdivision

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
Effects on Māori Land. Recognising the cultural relationship with this whenua. Maintaining connections to ancestral lands impacted by Natural Hazards.	Māori have strong ancestral ties to land, making relocation difficult. There is a risk that hazard classifications place significant restrictions on how whenua Māori Land can be used, including potential alienation from Māori land impacted by Natural Hazards.	This was not something that was within scope of PC78 as much Māori Land is in the rural area.	This issue has been acknowledged in Chapter B10, with provision for managed retreat and special policies for use and development of marae while managing natural hazard risks in Chapters E39 and E36, respectively. The natural hazards viewer shows clearly where Māori land is at risk from natural hazards. Existing provisions in Chapter E20 provide for development on Māori land. The proposed NES Papakāinga will provide more enabling and consistent approach to development of Māori land and will be introduced as part of the RM Reforms. No changes have been proposed for E20 in the RPC. Council and mana whenua could collaborate	RPC maps Chapter B10 (Environmental risk) Chapter E36 (Natural Hazards) Chapter E39 (Subdivision – Rural)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			on further improvements as part of the AUP 2.0 workstream. Auckland Council is able to support owners of Māori land with technical advice and access to funding through the Cultural Initiatives Fund.	
Effects on Treaty Settlement Land. Recognising the cultural relationship with this whenua. Upholding settlements. Enabling development	There is a risk that hazard classifications place significant restrictions on how Treaty Settlement Land can be used, including restrictions on the intended use of redress land.	This was not something that was within scope of PC78	This issue has been acknowledged in Chapter B10, with provision for managed retreat and special policies for use and development of marae while managing natural hazard risks in Chapters E39 and E36, respectively. The natural hazards viewer shows clearly where Treaty settlement land is at risk from natural hazards. Auckland Council recognises the issues this presents for the durability of Treaty settlements and has	RPC maps Chapter B10 (Environmental risk) Chapter E36 (Natural Hazards) Chapter E39 (Subdivision – Rural)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			raised the issue with central government officials. Existing provisions in Chapter E21 provide for development on Treaty settlement land. No changes have been proposed for these provisions in the RPC. Council and mana whenua could collaborate on further improvements as part of the AUP 2.0 workstream.	
Access to Māori Land, Treaty Settlement land and significant sites	A number of sites returned to mana whenua, or of significance to mana whenua, are landlocked. This is a Crown legacy issue and needs to be addressed. Erosion and coastal inundation are exacerbating access issues to land, to sites of significance, and to mahinga kai.	This was not something that was within scope of PC78.	Agree that the Crown needs to have a role. Auckland Council can potentially support access where it owns adjacent land and through facilitating conversations with owners of adjacent private land. Where access to these spaces is provided via public open space, esplanade strips and reserves, easements etc, the council team does not propose any changes	Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			to these spaces and arrangements in the RPC. While it is limited to the scope of addressing natural hazard areas, the RPC includes a policy that requires infrastructure providers to consider whether the potential of their activity to reduce natural hazard risks for Māori land, Treaty settlement land, marae, urupā, mana whenua cultural heritage and values. To the extent that reducing risks involves provision of access this example could be supported by new policies. The RPC also includes an allowance for hard protection to be considered to protect mana whenua cultural heritage and values or to provide for continued use and access to Māori land, Treaty settlement land, marae or urupā, where	

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			nature-based solutions are not feasible.	
Providing of housing for Māori – equitable outcomes	Māori are disproportionately impacted by natural hazards. The increasing cost of housing, insurance and land development reduces the ability to whānau to remain in ancestral homes. Natural hazards pose a material risk to property, leading to costly repairs and health impacts.	This was not something that was within scope of PC78.	NPSUD clause 3.23 requires councils to prepare a Housing and Building Capacity Assessment that takes into account the current and future housing needs for Māori. This will be assessed as part of the refresh of the Future Development Strategy in 2026, and will inform the AUP 2.0 (full review of the Auckland Unitary Plan proposed to begin in late 2026).	NA
Effects on freshwater and coastal ecosystems (from sediment, pollution, natural hazards)	Increased soil erosion contributes to sedimentation in rivers and streams. Often caused by certain land uses (e.g. deforestation, agricultural activities) and exacerbated by flooding and extreme weather	This was not something that was within scope of PC78.	The RPC does not contain a catchment level response to the management of freshwater, as this is intended to be addressed by the NPS-FM. The existing AUP protections around the	Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	events. This leads to degradation of water quality and aquatic habitats and ecosystems		management of freshwater remain. Changes to E36 will provide further policies to consider the effects of subdivision, use and development in areas with natural hazard risks, including impacts on the environment. These relate to maintaining the function of overland flow paths and designing coastal protection to avoid erosion.	
Effects on mahinga kai	Extreme weather events, sedimentation, climate change, and other hazards can severely impact ecosystems which are relied upon for mahinga kai. This results in adverse effects on cultural activities and ability to provide manaakitanga.	This was not something that was within scope of PC78.	The RPC requires assessment of the consequences of natural hazard risks which includes cultural impacts such as effects on mahinga kai.	Chapter E36 (Natural Hazards)
Increased risk of wildfires	Wildfire risk is increased due to climate change, development in high fire risk areas, and	This was not something that was within scope of PC78.	The RPC does not include new mapping or rules specific to managing wildfire risk.	Chapter B10 (Environmental Risk)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	insufficient setbacks from forested areas. Impacts include loss of native trees and plants and their ecosystems, air pollution, risk to life and property.		However, changes to Chapter B10 include a new policy to ensure that subdivision, development and vegetation management mitigate wildfire hazards to as low as reasonably practicable. This will be a relevant planning consideration for structure plans, plan changes, notices of requirement, and non-complying and discretionary activities. Further rules such as minimum setbacks or fire management zones could be incorporated into future precincts.	
Improve monitoring of discharges, water quality, consent conditions, effects on cultural values and sites of significance.	Enables improved monitoring and responses to effects on mauri, biodiversity, cultural values by mana whenua within their rohe – especially cumulative effects and effects from severe weather events.	This was not something that was within scope of PC78.	The management of freshwater is intended to be addressed by the NPS-FM. The existing AUP protections around the management of freshwater, and regulations on discharges into water, the coastal environment, and onto land, remain.	Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
Provide opportunities for cultural monitoring by mana whenua.	This supports protection of taonga species, mahinga kai and other cultural values.		Cultural monitoring by kaitiaki can be requested as a condition to a consent where there are concerns about cultural impacts during construction, including for accidental discovery. This is a possible outcome of the new chapter E36 changes as well as under existing land disturbance rules. Monitoring frameworks, customary management tools, protocols for rāhui, and other methods providing for kaitiakitanga could potentially be a topic for negotiation in Mana Whakahono ā Rohe agreements.	
Nature-based solutions as primary hazard mitigation approaches	Hard infrastructure has significant impacts on the environment. Nature-based solutions such as wetlands and dune restoration help to restore the health of te taiao.	This was not something that was within scope of PC78.	The RPC encourages nature-based solutions in preference to hard protection structures, and seeks to maintain and enhance the flood storage and conveyance functions of floodplains and overland flow	Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			paths. Where hard protection is proposed the proposal will need to assess effects on a broad range of Māori values, rights and interests, including Māori land, Treaty Settlement land, marae, urupā, mana whenua cultural heritage and values.	
Use of rāhui and other customary management tools providing for kaitiakitanga	Enables mana whenua to meet their kaitiakitanga obligations, and to respond to local context including protection of wāhi tapu and restoration of ecosystems.	This was not something that was within scope of PC78.	This is not specifically addressed by the RPC. The RPC does require relevant management plans, strategies or hazard risk assessment relating to an area to be considered as part of a natural hazards risk assessment. This will include Shoreline Adaptation Plans and other documents to which mana whenua have contributed. These risk assessments and the need to consider environmental and cultural impacts will create further opportunity for mana	Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
			whenua resource management practitioners to develop conditions at the level of an individual place. Monitoring frameworks, customary management tools, protocols for rāhui, and other methods providing for kaitiakitanga could potentially be a topic for negotiation in Mana Whakahono ā Rohe agreements.	
Linking infrastructure and growth, and prioritise equitable access to essential infrastructure for mana whenua.	Lack of reticulated water and wastewater infrastructure increases health risks and reduces climate resilience. Poor stormwater infrastructure leads to flooding, erosion and pollution of freshwater ecosystems. Unreliable telecommunications infrastructure, especially in coastal areas, exacerbates the	This was not something that was within scope of PC78.	The RPS includes policies which require natural hazard risk assessments and infrastructure providers to consider whether natural hazard risks can be reduced for Māori, as well as considering environmental and cultural impacts. The intention behind this policy is to encourage infrastructure providers to locate and design infrastructure in a way that	Chapter E36 (Natural Hazards)

Matters Raised	Why are they relevant?	Issue - similar or different to PC78?	Council staff response	Draft RPC reference
	challenges of emergency response. Inappropriately-designed infrastructure can have adverse effects on vulnerable ecosystems, health, whenua Māori, cultural values, sites of significance, and cultural landscapes.		addresses infrastructure gaps and risks for Māori, particularly rural whānau. This could be conceived of as a primary purpose for the infrastructure or as an incidental benefit of infrastructure provided for a different purpose.	

Attachment C2 – Feedback from Mana Whenua on Replacement Plan Change – [Ngaati Tamaoho, Ngaati Te Ata, Te Ākitai Waiohūa]

Attachment C2 – Feedback from Mana Whenua on Replacement Plan Change



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05 September 2025

To: The Planning Committee
Auckland Council
Private Bag 92300
Auckland 1142

Tēnā koutou,

Re: Intensification Planning Instrument (IPI) – Cultural Response from Ngati Tamaoho

- On behalf of Ngati Tamaoho, I am submitting our cultural response to the proposed Intensification Planning Instrument (IPI) under the National Policy Statement on Urban Development (NPS-UD) and Medium Density Residential Standards (MDRS).
- This response reflects the collective whakaaro of Ngati Tamaoho regarding the impacts of urban intensification on culturally significant landscapes, sites, and practices. It outlines key concerns, proposes amendments, and presents a framework grounded in Te Ao Māori and our Ngati Tamaohotanga to guide future planning decisions.
- We acknowledge the engagement undertaken by Auckland Council to date and seek to continue this partnership in a manner that upholds the principles of Te Tiriti o Waitangi. We trust that our response will be given consideration and incorporated meaningfully into the planning process.
- This response is stepped out in all the different sections of the kaupapa/project with the relevant recommendations and outcomes we are seeking under each section.
- Please find attached our response titled **“Council Response: Cultural Response to Urban Intensification – Ngati Tamaoho Perspective.”**

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Council Response: Cultural Response to Urban Intensification

Summary

Purpose:

Outlines Ngati Tamaoho's cultural response to urban intensification under the NPS-UD and MDRS, proposing amendments and a framework grounded in Te Ao Māori and Ngati Tamaohotanga.

Key Themes:

- **Te Tiriti o Waitangi:** Partnership, protection, participation.
- **Cultural Pillars:** Kaitiakitanga, Whanaungatanga, Manaakitanga, Rangatiratanga, Tohungatanga.
- **Practical Actions:** Cultural Impact Assessments, iwi design panels, monitoring, education.
- **Amendments Proposed:**
 - Stronger protection for cultural sites.
 - Upgrading heritage classifications.
 - Exclusion zones around maunga.
 - Inclusion of iwi in infrastructure planning.
 - Coastal hazard planning and rezoning.
 - Mandating Māori design principles.
 - Safeguarding papakāinga and Māori Purpose Zones.
 - Co-developing protocols for accidental discoveries.

Cultural Narrative Coastal Environment (22.08.2025)

Purpose:

Provides a cultural narrative to support the Coastal Environment as a qualifying matter in the Integrated Intensification Plan Change (IIPC).

Key Themes:

Coastal Environment Significance: Deep ancestral, cultural, ecological, and spiritual connections.

Pressures Identified:

- Climate change, reclamation, biodiversity loss, pollution, restricted and no access through private landownership, and infrastructure issues, loss of traditional resource collection, Maori reservation lands in flood prone areas susceptible to sea level rise on marginal areas with no room for relocation, infilling of waterways and development activities in surrounding areas and farms that cause further subsidence and flooding around these traditional areas of occupation.

Ngati Tamaoho Recommendations:

- Rezoning hazard-prone areas to low density.
- Allowance to be able to initiate land buyout to enable relocation.
- Applying height variation controls.
- Preference for natural adaptation strategies.
- Reconnection to ancestral shorelines and moana.
- Improve the process and reduce the times for scheduling sites of significance.

Implementation Measures:

- 100m buffer zone from coastline.
- Removal of Height Variation Controls (HVCs) in sensitive areas.
- Use of MCA framework designed by Ngati Tamaoho to enable better outcomes, so cultural values are not so difficult to quantify.
- Scheduled sites and Māori Alert layers used to guide planning.

Assessment Summary:

1. **Recognition of Te Ao Māori:** Both documents embed Māori values and principles in planning.
2. **Protection of Cultural Heritage:** Strong emphasis on safeguarding wāhi tapu, urupā, and taonga.
3. **Inclusion in Planning:** Proposals for co-design, co-governance, and iwi-led monitoring.
4. **Environmental Guardianship:** Kaitiakitanga is central, with support for ecological overlays and restoration.
5. **Precautionary Zoning:** 100m buffer and rezoning of hazard-prone areas align with iwi calls for climate resilience.
6. **Support for Papakāinga:** Recognition of communal living and Māori Purpose Zones.

Effects:

1. **Limited Time for Engagement:** Development of IIPC was rushed, limiting iwi input.
2. **Quantification of Cultural Values:** MCA framework struggled to capture tikanga and cultural nuance.
3. **Reactive Rather Than Proactive:** Some measures (e.g., buffer zones, historical process's) are mitigation-focused rather than enabling cultural revitalisation.
4. **Lack of Specificity in Implementation:** Cultural overlays and design principles are mentioned but not fully operationalised.
5. **Potential for Reverse Sensitivity:** Adjacent intensification may still impact Māori zones without robust protections (Nga Hau E Wha Marae, Whatapaka Marae, Mangatangi Marae).

Proposed Amendments and Recommendations

Amendment	Recommendation
1. Cultural Value Mapping	Develop iwi-led cultural mapping to replace or complement MCA scoring or redesign to a cultural MCA process.
2. Mandatory Cultural Impact Assessments	Require CIAs for all developments within 100m of coastline or near scheduled sites.
3. Expanded Buffer Zones	Consider extending the 100m buffer to 150–200m in high-risk or high-value areas.
4. Tikanga Protocols for Accidental Discoveries	Co-develop protocols with iwi for managing finds, including spiritual processes.
5. Iwi Design Panels	Formalise iwi representation in all urban design review panels.
6. Papakāinga Safeguards	Introduce reverse sensitivity rules to protect Māori Purpose Zones from adjacent development.
7. Customary Access Corridors	Reinstate and protect putanga (access corridors) to the coast for mahinga kai. Protect traditional waterways from reclamation and resculpting that allows for development. Council Planning Regulations that effect the health and well being of the oceans, rivers, aquifer, lakes that are the access ways into the cultural landscapes of wetlands and Paa.
8. Climate Adaptation Co-Governance	Embed iwi in shoreline adaptation planning and hazard zoning decisions.
9. Education and Capacity Building	Fund iwi-led training for planners and developers on Te Ao Māori and tikanga.
10. Monitoring and Enforcement	Establish iwi-led monitoring teams with enforcement powers for cultural and environmental breaches.
11. Reverse Sensitivity	Protect our marae in traditional land uses, prevent complaints, protect iwi autonomy and cultural expression, support long-term sustainability by using buffer zones, design controls, notification requirements, disclosure obligations, ability to down zone housing around marae, protection of Urupa and Wahi Tapu of Marae from development.

Summary of the Auckland Unitary Plan (AUP)

PC78 Replacement Plan Change Chapters A–D.

- **Purpose:** Promote sustainable management of Auckland’s natural and physical resources.

- **Structure:** A combined plan integrating regional and district planning documents, organized into fourteen chapters including overlays, zones, precincts, and Māori terms.
- **Replacement:** Consolidates legacy plans across Auckland, except for the Hauraki Gulf Islands.

Key Amendment Changes in PC78

Qualifying Matters

- Introduced or updated to **limit intensification** where necessary.
- Include:
 - **Significant Ecological Areas (SEA)**
 - **Outstanding Natural Features and Landscapes**
 - **Historic Heritage**
 - **Sites of Significance to Ngati Tamaoho**
 - **Infrastructure constraints**
 - **Natural hazards**
 - **Special character areas**

Urban Growth and Intensification

- Focus on **well-functioning urban environments**.
- **Avoid intensification** in areas with significant natural hazard risk or cultural/heritage values.
- **Enable intensification** near transport hubs, centres, and corridors—unless constrained by qualifying matters.

Environmental Risk and Natural Hazards

- New provisions for **climate change resilience, managed retreat, and hazard mapping**.
- **Three-tier risk framework:** significant, tolerable, acceptable.
- **Precautionary approach** adopted for uncertain risks.

Overlay Updates

- Expanded overlays for:
 - **Significant Ecological Areas (D9)**
 - **Outstanding Natural Features and Landscapes (D10)**
 - **Waitākere Ranges Heritage Area (D12)**
 - **Notable Trees (D13)**
 - **Sites of Significance to Mana Whenua (D21)**

Assessment

- **Recognition of Ngati Tamaoho values** in overlays and qualifying matters.

- **Kaitiakitanga** (guardianship) embedded in ecological and hazard management.
- **Te Ora ō Tāmaki Makaurau Wellbeing Framework** used to assess impacts on whakapapa, whenua, wai, marae, and whānau but is a modern construct that does not give the ability to incorporate tikanga, and culture.
- **Mātauranga Māori** (Māori knowledge) and **tikanga** (customs) required in hazard assessments but not specific around how this will be implemented and whether outcomes will be culturally acceptable.
- **Protection of wāhi tapu**, ancestral landscapes, and spiritual values.
- **Enabling Māori development** on Māori and Treaty Settlement land.
- **Active participation** in decision-making and plan changes.
- **Potential under-recognition** of intangible cultural values not yet scheduled.
- **Development pressure** near culturally significant areas may still occur.
- **Resource constraints** may limit iwi participation in technical planning processes.
- **Need for stronger enforcement** of cultural protocols and engagement requirements.
- **Risk of fragmentation** of sites of significance through subdivision, a slow process of registration of sites of significance, and the tendency for the Pouhere Taonga process that enable archaeological site destruction.

Ngati Tamaoho Recommendations:

1. **Support qualifying matters** that protect cultural landscapes and taonga without restrictions on how many matters are to be addressed.
2. **Advocate for co-governance** and early engagement in plan changes, all resource consents, spatial plans, council documents and the ability to voice opposition for proposed frameworks ie: Te Ora o Tamaki Makaurau.
3. **Request mapping project funding** to enable us to have our own database and include additional sites of significance to this and the council programme.
4. **Ensure mātauranga Māori** is central to hazard and ecological assessments.
5. **Promote papakāinga and Māori Purpose Zones** as adaptive responses to climate and housing pressures.
6. **Monitor implementation** of overlays and ensure compliance with cultural protocols.

Recognition of Ngati Tamaoho Values

- The Plan embeds **Ngati Tamaoho participation** in planning and decision-making.
- It acknowledges **ancestral relationships** with land, water, sites, wāhi tapu, and taonga.
- **Sites of Significance to Ngati Tamaoho (D21)** are protected from inappropriate development.

Qualifying Matters

- Areas of cultural significance are now **qualifying matters**, limiting urban intensification.
- Includes overlays for:
 - **Significant Ecological Areas (SEA)**
 - **Outstanding Natural Features and Landscapes**

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- **Historic Heritage**
- **Maunga Viewshafts**
- **Special Character Areas**

Papakāinga and Māori Development

- Amendments support **papakāinga housing**, **marae**, and **customary use** on Māori land.
- Enables **economic development** aligned with cultural values.
- Ability to make change within plan changes.

Natural Hazards and Climate Change

- Māori are identified as **disproportionately affected** by climate hazards.
- Policies require:
 - Use of **mātauranga Māori** in risk assessments.
 - **Integrated Māori development** on Māori and Treaty Settlement land.
 - **Managed retreat** planning with iwi involvement.

Environmental Protection

- SEA overlays protect biodiversity and allow **cultural harvesting** where mauri is sustained.
- Iwi are recognized as **kaitiaki**, with roles in restoration and pest control.

Subdivision and Development Controls

- Subdivision in areas like the **Waitākere Ranges and Hunua Heritage Area** is tightly controlled.
- Legal mechanisms (e.g., covenants) protect ecological and cultural values.
- Development must avoid or mitigate impacts on **scheduled sites** and **landscapes of significance**.

Infrastructure and Utilities

- Existing infrastructure is allowed with conditions.
- New infrastructure must **avoid adverse effects** on iwi values and scheduled sites and enable iwi to be able to negotiate their own mechanisms if it is unavailable.

Notification and Consent Processes

- Ngati Tamaoho are explicitly considered **affected parties** in resource consent applications.
- Cultural assessments and iwi planning documents must inform decisions.

Draft PC78 Replacement Plan Change Chapters E–G

Summary of Key Themes

- **Infrastructure (E26):** Covers development, operation, maintenance, upgrading, and removal of infrastructure across Auckland, including electricity, water, telecommunications, and transport.
- **Natural Hazards (E36):** Focuses on managing infrastructure in areas prone to flooding, coastal erosion, and other hazards.
- **Ngati Tamaoho Recognition:** Strong emphasis on protecting sites of significance, cultural values, and ensuring engagement with iwi.
- **National Alignment:** Integrates with national standards (NESETA, NESTF, Freshwater NES) and policy statements (NPS-UD) although details have not been finalised.

Assessment:

Aspect	Pros	Cons
Recognition of Ngati Tamaoho	Explicit inclusion of cultural values, overlays, and sites of significance	Infrastructure may still proceed in sensitive areas if justified by operational need.
Engagement Requirements	Requirement for iwi planning documents and cultural impact assessments	Some activities are permitted or non-notified, limiting iwi input
Accidental Discovery Protocols	Strong protection for kōiwi, taonga, and archaeological sites	Reliance on mitigation rather than avoidance in some cases
Nature-Based Solutions	Preference for natural buffers aligns with Māori environmental values	Complexity of overlays may challenge iwi participation without support
Assessment Criteria	Includes effects on whakapapa, local history, and tikanga	Limited enforcement mechanisms if iwi concerns are not addressed

Amendment Area	Details
National Policy Statement – Urban Development (2020, updated 2022)	Incorporated as a qualifying matter in infrastructure planning
Freshwater NES (2020)	Most restrictive rule applies in case of conflict with plan provisions
Activity Tables	Updated to reflect permitted, discretionary, and restricted discretionary statuses across zones and overlays
Overlay Integration	Expanded overlays for Ngati Tamaoho, heritage, ecological areas, and volcanic viewshafts
Accidental Discovery Rule	Strengthened protocols for sensitive material including kōiwi and taonga

Recommendations for Cultural Response Table

Recommendation	Purpose	Implementation Notes
Early Engagement	Ensure iwi are involved from the outset	Include in pre-application and design phases
Cultural Impact Assessments	Evaluate effects on cultural values	Mandatory for activities near sites of significance
Reference Iwi Management Plans	Align with iwi aspirations and tikanga	Use as guiding documents in decision-making
Nature-Based Solutions	Support environmental and cultural integrity	Avoid hard infrastructure in sensitive areas
Accidental Discovery Protocols	Protect taonga and kōiwi	Train contractors and include in consent conditions
Restoration Initiatives	Enhance natural and cultural values	Include native planting and site rehabilitation
Capacity Building	Empower iwi participation	Provide funding, training, and technical support
Monitoring and Adaptive Management	Track impacts and adjust as needed	Include iwi in monitoring teams and reporting
Transparent Decision-Making	Build trust and accountability	Document iwi input and rationale for decisions

Draft PC78 Replacement Plan Change Chapters E–G

Assessment:

Aspect	Pros for Iwi	Cons for Iwi
Recognition of Ngati Tamaoho	Explicit inclusion of cultural values, overlays, and sites of significance	Infrastructure may still proceed in sensitive areas if justified by operational need
Engagement Requirements	Requirement for iwi planning documents and cultural impact assessments	Some activities are permitted or non-notified, limiting iwi input
Accidental Discovery Protocols	Strong protection for kōiwi, taonga, and archaeological sites	Reliance on mitigation rather than avoidance in some cases
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Assessment Criteria	Includes effects on whakapapa, local history, and tikanga	Limited enforcement mechanisms if iwi concerns are not addressed

Tracked Amendments:

Amendment Area	Details
National Policy Statement – Urban Development (2020, updated 2022)	Incorporated as a qualifying matter in infrastructure planning
Freshwater NES (2020)	Most restrictive rule applies in case of conflict with plan provisions
Activity Tables	Updated to reflect permitted, discretionary, and restricted discretionary statuses across zones and overlays
Overlay Integration	Expanded overlays for Ngati Tamaoho, heritage, ecological areas, and volcanic viewshafts
Accidental Discovery Rule	Strengthened protocols for sensitive material including kōiwi and taonga

Recommendations for Cultural Response Table

Recommendation	Purpose	Implementation Notes
Early Engagement	Ensure iwi are involved from the outset	Include in pre-application and design phases
Cultural Impact Assessments	Evaluate effects on cultural values	Mandatory for activities near sites of significance
Reference Iwi Management Plans	Align with iwi aspirations and tikanga	Use as guiding documents in decision-making
Nature-Based Solutions	Support environmental and cultural integrity	Avoid hard infrastructure in sensitive areas
Accidental Discovery Protocols	Protect taonga and kōiwi	Train contractors and include in consent conditions
Restoration Initiatives	Enhance natural and cultural values	Include native planting and site rehabilitation
Capacity Building	Empower iwi participation	Provide funding, training, and technical support
Monitoring and Adaptive Management	Track impacts and adjust as needed	Include iwi in monitoring teams and reporting
Transparent Decision-Making	Build trust and accountability	Document iwi input and rationale for decisions

PC78 Replacement Plan Change Chapters J, K, L, M

General Mitigation Principles for Mana Whenua:

- **Avoidance:** Preventing adverse effects before they occur (e.g., avoiding development in high-risk flood zones).

- **Remediation:** Correcting or reversing adverse effects (e.g., soil remediation on contaminated land).
- **Mitigation:** Reducing the severity of effects (e.g., using stormwater devices to reduce runoff).
- **Offsetting:** Compensating for residual effects (e.g., biodiversity offsets for habitat loss).

Ecological and Environmental Mitigation

Significant Ecological Areas (SEAs)

- **Legal Protection:** Use of covenants, encumbrances, or reserve vesting to permanently protect SEAs.
- **Stock Exclusion:** Fencing to prevent livestock from entering protected areas.
- **Pest Control:** Ongoing management of plant and animal pests.
- **Monitoring:** Every 3 years by a qualified ecologist, covering:
 - Fencing effectiveness
 - Pest presence
 - Vegetation health
 - Pollution
 - Wildfire risk
 - Ngati Tamaoho access
 - Water Indicator
 - Cultural Monitoring
- **Cultural Auditing:**
 - Ability to assess areas in a culturally appropriate manner.

Revegetation Planting

- **Planting Plans:** Must include species selection, density (e.g., 1.4m spacing = 5,100 stems/ha), and ecological linkages.
- **Maintenance:** Until 80% canopy closure and 90% survival rate.
- **Weed and Pest Management:** Pre- and post-planting control of invasive species.
- **Wildfire Risk Mitigation:** Use of low-flammability species and site design to reduce fire spread.
- **Procurement:** Opportunities to employ our people.

Subdivision and Land Use Mitigation

Transferable Rural Site Subdivision (TRSS)

- **Donor Sites:** Must protect indigenous vegetation or wetlands.
- **Receiver Sites:** Must be in the Countryside Living Zone.
- **Legal Instruments:** Required to ensure long-term protection and management.

Site-Specific Technical Reports

- Required for:
 - Flood hazard areas.
 - Coastal erosion/inundation zones
 - Landslide susceptibility
 - Mataranga Maori component.
- Must be prepared by qualified professionals and reviewed by Council .

Heritage and Archaeological Mitigation

Schedule 14.1 – Historic Heritage Places

- **Extent of Place:** Defines what is protected (e.g., façade, structure).
- **Exclusions:** Interiors, modern additions, or non-contributing elements may be excluded to allow flexibility.
- **Archaeological Sites:** Require compliance with the Heritage New Zealand Pouhere Taonga Act 2014 and are subject to archaeological destruction.

Design Guidelines

- **Alterations:** Must be reversible and not obscure primary heritage features.
- **New Development:** Must be compatible in scale, form, and materials.

Stormwater and Wastewater Mitigation

- **Stormwater Management Devices:**
 - Rain gardens
 - Permeable paving
 - Wetlands and ponds.
 - Catchpits.
 - Swales
- **Integrated Catchment Management Plans:**
 - Identify risks and preferred mitigation strategies.
- **Flood Tolerant Activities:**
 - Certain land uses (e.g., recreation, farming) are allowed in flood-prone areas due to their low vulnerability.

Wildfire Risk Mitigation

- **Assessment:** Required for all revegetation and SEA protection plans.
- **Species Selection:** Avoid highly flammable plants near vulnerable areas.
- **Ongoing Management:** Integrated into legal protection and monitoring plans.
- **Establishment of Firebreaks and nearby Water sources:** Mechanisms for protection and monitoring,

Legal and Procedural Mitigation Tools

- **Management Plans:** Required for all protected ecological areas.
- **Section 224(c) Certification:** Issued only after all mitigation works are completed.
- **Qualified Oversight:** Suitably qualified and experienced professionals must certify all plans and reports, and that mana whenua have preferred advisors they can be called on to advise.

Cultural and Māori Heritage Mitigation

- **Ngati Tamaoho Engagement:** Required for sites of cultural significance.
- **Te Wāhi Hunuku Sites:** Allow relocation of marae or urupā away from hazard zones, with legal mechanisms to prevent future risk.

Key Mitigation Areas

Area	Mitigation Measures
SEAs & Wetlands	Legal protection, fencing, pest control, monitoring
Revegetation	Planting plans, maintenance, wildfire risk reduction
Subdivision	TRSS, site-specific reports, ecological linkages
Heritage	Extent of place, exclusions, design compatibility
Stormwater	Devices (e.g., rain gardens), catchment plans
Wildfire	Risk assessment, species selection, ongoing control
Cultural Sites	Relocation provisions, legal safeguards, iwi consultation

Appendix 15: Subdivision

Summary

Te Wāhi Hunuku Site Subdivision

- Allows relocation of marae and urupā from areas of significant natural hazard risk.
- Provides for new sites (up to 10 ha in rural zones, 1ha in Future Urban Zone).
- Requires cultural input in hazard risk assessments.
- Decisions must follow tikanga and involve iwi, hapū, whānau, and haukāinga.
- Legal mechanisms (encumbrances or Māori Reservation status) ensure cultural use of new sites.
- Original sites must be legally restricted from future hazardous development.

Boundary Relocation

- Enables expansion of existing marae/urupā sites to avoid hazard zones.

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- No size limit, but cultural use must be maintained.
- Legal protections required for both new and original sites.

Transferable Rural Site Subdivision (TRSS)

- Allows rural development potential to be transferred to Countryside Living Zones.
- Can be based on ecological protection or amalgamation of donor sites.
- Includes legal protections for indigenous vegetation and wetlands.

Assessment & Recommendations.

	Details
Cultural Safety	Enables relocation of marae/urupā from hazardous areas, protecting people and taonga.
Tikanga-Based Decision Making	Recognizes the importance of iwi, hapū, and whānau in decision-making.
Legal Recognition	Use of Māori Reservations ensures long-term cultural use and governance.
Flexibility in Site Selection	Allows culturally significant factors (e.g., kōrero tuku iho, landmarks) to guide site choice.
Environmental Protection	TRSS provisions support ecological restoration and protection aligned with kaitiakitanga.
Complex Legal Processes	Requires engagement with Māori Land Court and legal mechanisms that may be unfamiliar or costly.
Time limit	Estimated 2-year process may delay urgent relocations.
Limited Size in Future Urban Zone	1ha may be insufficient for some marae/urupā needs.
Monitoring Burden	Ongoing ecological monitoring and compliance may strain iwi resources.
Potential for Misalignment	Council processes may not fully align with tikanga or iwi aspirations without strong engagement.

Recommended Amendments (Table)

Provision	Recommended Amendment	Rationale
Site Size Limit (Future Urban Zone)	Increase from 1ha to 2ha	Better accommodates urupā and future expansion needs.
Legal Mechanisms	Provide Council-funded legal support	Reduces burden on iwi trusts navigating complex legal processes.
Monitoring Requirements	Co-design monitoring plans with iwi	Ensures cultural values are reflected and reduces compliance strain.
Time limit	Introduce fast-track option for urgent relocations	Supports timely response to hazard risks.

Provision	Recommended Amendment	Rationale
Engagement Process	Mandate early and ongoing engagement with iwi	Strengthens partnership and ensures tikanga is upheld.

Mediation Recommendations

To support iwi and Council collaboration, consider:

1. **Facilitated Hui:** Early hui with Council, iwi, hapū, and marae trustees to co-design subdivision plans.
2. **Cultural Impact Assessments:** Required as part of hazard risk assessments, led by iwi experts.
3. **Joint Governance Panels:** Include iwi representatives in decision-making panels for subdivision approvals.
4. **Funding Support:** Council to provide grants or resources for legal, ecological, and planning support.
5. **Tikanga Integration:** Embed tikanga Māori into all stages of the subdivision process, including site selection, legal mechanisms, and monitoring.

E39 Subdivision – Rural

Summary:

This section of the Auckland Unitary Plan outlines the rules, objectives, policies, and standards for **rural subdivision**. It aims to balance **productive rural land use, environmental protection**, and **cultural heritage**, particularly for **Ngati Tamaoho**.

Cultural Considerations:

- **Te Wāhi Hunuku Sites** allow relocation of marae and urupā from areas of intolerable natural hazard risk.
- Cultural decision-making must involve **iwi, hapū, whānau, and haukāinga**.
- Sites must be protected legally (e.g., Māori Reservation status).
- Development must **avoid adverse effects** on scheduled natural and cultural heritage.

Environmental Stewardship:

- Subdivision is encouraged only when it **enhances indigenous ecosystems**.
- Legal protection of **Significant Ecological Areas (SEAs)** is required.
- **Revegetation planting** must meet ecological standards and be maintained.

Key Themes:

- **Protection of elite and prime soils** to prevent fragmentation.
- **Limited subdivision** allowed for:

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- Indigenous vegetation and wetland protection.
- Relocation of marae and urupā from natural hazard zones (Te Wāhi Hunuku Sites).
- **Transferable rural site subdivision** to incentivise land amalgamation and ecological protection.
- **Infrastructure and amenity standards** to ensure sustainable development.
- **Recognition of Māori cultural heritage** and **tikanga-based decision-making**.

Mitigation Table

Aspect	Pros	Cons / Risks	Mitigation / Mediation Advice
Te Wāhi Hunuku Sites	Enables safe relocation of marae/urupā	Risk of cultural disconnection from ancestral land	Ensure tikanga-based decision-making and legal protection of new sites, no size limitations
Protection of SEAs	Supports kaitiakitanga and biodiversity	May limit development options	Engage iwi ecologists early; use revegetation to enhance cultural landscapes.
Transferable Rural Site Subdivision	Incentivises ecological protection and land amalgamation	Potential for inequitable land access	Transparent processes and iwi consultation on receiver site selection
Avoidance of elite/prime soil fragmentation	Preserves land for food sovereignty	Limits housing options for whānau	Explore communal housing models within permitted zones
Infrastructure Requirements	Ensures sustainable living conditions	Cost and complexity for marae relocation	Council support for infrastructure grants and iwi-led planning
Reverse Sensitivity Management	Protects rural production from lifestyle conflicts	May restrict marae activities	Design layouts that buffer cultural sites from incompatible uses
Esplanade Reserves	Enhances access and ecological protection	May affect customary access	Negotiate co-management agreements for access and use
Amenity and Landscape Integration	Maintains rural character	Risk of cultural erasure in design	Incorporate Māori design principles and cultural markers

Recommendations for Iwi Engagement

1. **Early and ongoing consultation** with Council and developers.
2. **Cultural impact assessments** for all subdivision proposals near marae, urupā, or SEAs.
3. **Legal mechanisms** (e.g., Māori Reservations, encumbrances) to protect relocated sites.

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4. **Use of tikanga and mātauranga Māori** in hazard assessments and site selection.
5. **Iwi-led planning** for revegetation and ecological restoration.
6. **Remuneration for specialist input from Ngati Tamaoho for all engagements, Cultural Values Assessments and Cultural Impact Assessments, Mahi Toi and Cultural Advice, procurement opportunities.**

“Should you require any further information or wish to discuss this response in more detail, we welcome the opportunity to meet kanohi ki te kanohi”.

Nga Mihi

Edith Tuhimata



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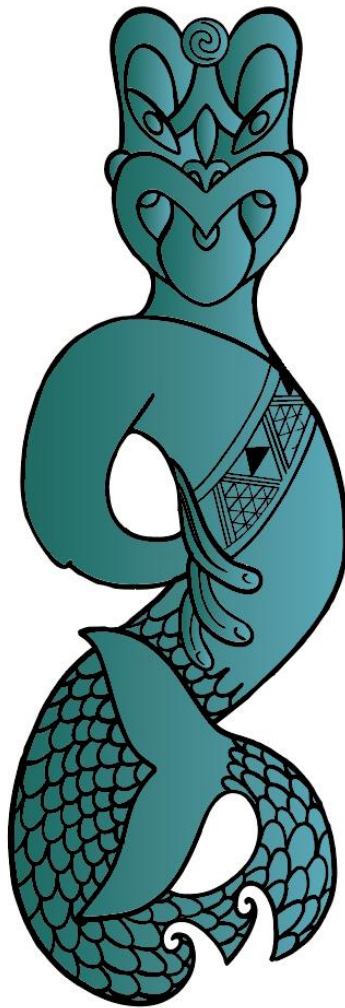
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NGAATI TE ATA WAIOHUA
HIGH LEVEL FEEDBACK FOR THE
DRAFT REPLACEMENT PLAN CHANGE
FOR THE
AUCKLAND UNITARY PLAN
PREPARED FOR AUCKLAND COUNCIL

8 September 2025

Ngaati Te Ata Waiohū maintains a profound and unbroken cultural, spiritual, and ancestral connection to Taamaki Makaurau (Auckland), where our iwi has lived for over 1000 years, mai raa anoo – since time immemorial. Our rights, interests, and associations span the whenua (land), maunga (mountains), motu (islands), kuurae (headlands), wai (waterways), and taonga (natural resources) of Taamaki, all of which are deeply grounded in the whakapapa of our founding Waiohū ancestors, Huakaiwaka and Te Rauwhakihaki. These tuupuna (ancestors) are the grandparents of our founding Ngaati Te Ata Waiohū ancestress, Te Ata-i-Rehia.

As tangata whenua tuuturu (original inhabitants) of Taamaki Makaurau, our whakapapa connections and take (claims) extend across the full breadth of Auckland, encompassing not only the region itself but also the wider northern Waikato.

Ngaati Te Ata Waiohū is Taamaki, and Taamaki is us — a living, breathing cultural landscape, ever-flowing through time, reaching back into the past while guiding us forward into the future.

“Ka whiti te raa ki tua o Rehua, ka ara a Kaiwhare i te rua.”

“As long as the sun shines on the West Coast, Ngaati Te Ata Waiohū will rise from the depths of the Manukau Harbour.”

Summary

Ngaati Te Ata Waiohū provides this high-level feedback to the Council iwi engagement team reflective of our ongoing involvement with Auckland Council processes over the past 18 months, including PC78, the Natural Hazards Plan Change and Whakarāpopoto, and multiple iwi engagement hui. This feedback signals Ngaati Te Ata priorities with further detailed feedback to follow.

Ngaati Te Ata considers the Replacement Plan Change (RPC) process timeframes to be impractical and inadequate for enabling meaningful engagement with iwi and the wider hāpori. We also hold serious concerns about the lack of analysis and robustness in the RPC process, which we understand is influenced by legislative requirements. This point is critical and must be acknowledged.

Ngaati Te Ata feedback highlights the following key areas of concern and action:

- **Cultural Protection and Landscapes:** safeguard the integrity of maunga, viewshafts, wāhi tapu, urupā, marae, and cultural landscapes by retaining Qualifying Matters and applying protections where intensification risks disturbance.
- **Water Security and Infrastructure:** improve rural water supply for marae and whānau and strengthen stormwater management with stronger protections for waterways, wetlands, and ecosystems in Franklin to prevent habitat loss and pollution.
- **Governance and Engagement:** mandate early and ongoing mana whenua engagement and embed mātauranga Māori in hazard identification, assessments, and decision-making.

- **Alignment with National Direction:** ensure consistency with NPS-UD, NPS-FM, NPS-IB, NPS-HPL, NZCPS, and the Regional Policy Statement, and avoid unnecessary Greenfields expansion into sensitive areas.
- **Safeguarding Against Inappropriate Development:** avoid intensification on elite soils, in cultural landscapes, and in flood-prone areas, and prioritise walkable, transit-focused growth instead of car-dependent sprawl.

Ngaati Te Ata Waiohūa will provide further robust feedback by 22 September, including draft policy considerations and potential recommendations for governance mechanisms to support iwi led decision making approaches.

This feedback is part of our Treaty relationship with Auckland Council. Council must act proactively to safeguard cultural values, iwi rights, and resilience. Ngaati Te Ata Waiohūa remains committed to working collaboratively to shape statutory planning processes in a way that honours Te Tiriti o Waitangi and supports equitable outcomes for current and future generations.

Focus Areas and Priorities for the Replacement Plan Change

Feedback collated into Focus Areas

The review consolidates Ngaati Te Ata Waiohua inputs into eight core focus areas that reflect our priorities. These include:

- protection of ancestral maunga
- integrated protection of cultural landscapes,
- safeguarding against inappropriate development,
- securing water supply and resilient infrastructure,
- embedding early and ongoing mana whenua engagement,
- recognising unscheduled sites of significance,
- embedding Treaty partnership expectations, and
- ensuring alignment with national and regional instruments.

The enduring interests of Ngaati Te Ata also extend into central Tāmaki Makaurau, including the Auckland CBD, where the protection of ancestral maunga remains paramount.

Our rohe

Within our rohe, which encompasses the full extent of Auckland Council's jurisdiction, we want to emphasise the need for particular attention in Drury, Karaka, Paerata, Pukekohe, Bombay, Waiuku, and Franklin — areas where growth and development pressures are most pronounced. These areas contain culturally significant landscapes, sensitive waterways, and important sites that demand stronger protection and clearer planning direction.

Priority Levels and Planning Direction

Each issue identified in this review has been assigned a priority level, signalling the urgency and importance of action in the plan change process. This structured approach makes it clear where Council should act to appropriately address Ngaati Te Ata values and deliver planning outcomes that are consistent, equitable, and future-focused.

Feedback Table Structure

The following table sets out responses in a structured planning format, demonstrating how cultural priorities align with statutory requirements under RMA s6(e), s7(a) and s8. This approach ensures that matters of national importance, kaitiakitanga, and Treaty principles are clearly addressed. Each key issue is assigned a priority level, indicating its relative importance and urgency for action in the plan change process. The priority levels are described as follows:

- **Critical** – Issues where there is an immediate and non-negotiable requirement for change. These reflect statutory obligations (e.g., Te Tiriti o Waitangi, settlement legislation), and cultural values where any failure to act would cause irreversible harm. Critical issues must be addressed as a top

priority in the plan change. For example, Housing rezoning over an urupā requires immediate action to prevent irreversible cultural harm.

- **Essential** – Issues that are fundamental to ensuring iwi values and planning outcomes are properly recognised. These require strong policy and rule responses and should be integrated early in the plan-making process to give effect to Treaty principles and avoid inequitable outcomes. For example, When new housing gets water services but a nearby marae does not, inequity occurs. Providing marae with reliable water at the same time ensures fairness and respect.
- **High** – Issues that are significant for iwi wellbeing and environmental integrity. They must be addressed through provisions or methods in the plan change but may allow for staged or phased implementation provided iwi are directly involved. For example, Mahinga kai protection should be phased with iwi involvement to sustain wellbeing.
- **Priority** – Matters requiring protection or management that are important but can be addressed through technical methods or minor refinements. This still requires iwi involvement but does not override Critical or Essential matters. For example, Design guidelines should be refined with iwi input to reflect cultural values in new developments.
- **Moderate** – Matters that are desirable to improve alignment with iwi values and national/regional instruments but may be addressed through broader strategic work or future plan change iterations. For example, future coastal hazard maps should also show cultural sites and values at risk such as marae, wāhi tapu, mahinga kai, and ancestral landscapes, so the full impact of hazards is understood and can be addressed in a future plan change.

Table: Ngaati Te Ata Waiohewa – Focus Areas

Key Topic	Key Issues	NTA Priority Focus	Priority Level	Relevant RPC Chapters	Commentary
Protection of Ancestral Maunga	Loss of sightlines. Disruption of viewshafts. Dark skies impacted.	- Protect the sightlines between inter-maunga (locally significant views) and maunga-moana (regionally significant views) and cultural integrity of ancestral maunga through the D14 Maunga viewshafts qualifying matter. - The maunga are central to Tāmaki Makaurau’s identity, shaping both the local and global landscape. These volcanic peaks are culturally and spiritually significant, attracting visitors worldwide.	High	Natural Character / Landscape / Heritage / Maunga Viewshafts	- Maunga are cultural markers. Provisions must avoid development that diminishes their visual and spiritual connections. - Protecting key viewshafts is crucial to preserving their prominence and ensuring future generations continue to honour their legacy. - Strongly support Viewshaft qualifying matters to protect inter-maunga and maunga–moana sightlines;
	Protection of cultural heritage: Waahi tapu, urupaa, marae, and Treaty Settlement land.	- Mapping and scheduling of sites is critical to prevent irreversible cultural loss. - Stronger rules are needed to avoid development around maunga and preserve viewshafts.	High	Viewshafts / Heritage / Natural Character	- Maunga and cultural sites are taonga requiring strict avoidance of adverse effects. - Mapping and scheduling are urgent to prevent irreversible loss.
	Intensification around Pukekohe Hill and Pukekiwiriki Pā places pressure on maunga/cultural viewshafts, risking obstruction of sightlines and loss of cultural integrity	- Retain viewshaft protections as Qualifying Matters; - Protect maunga viewshafts and cultural landscapes from intensification in surrounding growth areas.	High	Viewshafts / Heritage / Landscape / Natural Character / Sites of significance	Require cultural values assessments so intensification does not compromise maunga and cultural landscapes.
Integrated protection of cultural landscapes	Fragmented planning and treatment of interconnected features such as maunga, lava caves, aquifers, ancestral walking tracks, and viewshafts.	- Recognise and manage landscapes as interconnected taonga. - Understand the relationships between land, water, and cultural sites, and protect these connections as a cohesive whole.	Critical	Cultural Heritage / Landscapes / Geology & Natural Features / Coastal Environment / Ecology / Natural Hazards	- Require overlays and policies to address cumulative effects across landscapes, not isolated sites. - Avoid siloed rules fragment landscapes. - Maunga, aquifers, lava caves, and walking tracks must be managed as a single interconnected cultural landscape. - Current siloed overlays risk fragmenting values. - Strong integrated overlay provisions are needed.
	Fragmentation of cultural landscapes and ecological systems .		Critical		
Safeguard against inappropriate development	Urban expansion on elite soils (LUC 1–3), sprawl into sensitive areas	Prevent expansion into elite soils and culturally sensitive landscapes	Priority	Rural / Urban Growth / Soils	Kai security and soil integrity are strategic resources that must not be compromised by inappropriate zoning.
	Infrastructure and water security failures; Barriers to iwi-led adaptation	Hazard overlays and servicing gaps risk blocking Māori land use. Provisions must avoid unjust restrictions and instead enable Māori-led adaptation and development.	High	Land Use / Subdivision / Natural Hazards	Inadequate servicing and overlays can restrict Māori land use. Planning rules must avoid imposing disproportionate restrictions and instead enable culturally aligned adaptation.
	Rezoning near paa/urupaa has inadequate edge controls next to cultural sites.	- Apply non-complying activity status or bespoke precinct standards (height/bulk/coverage/setbacks) beside heritage/cultural sites; - Avoid inappropriate intensification adjacent to cultural sites.	High	Residential Zones MHS, MHU, THAB / Precincts / Subdivision / Land Use	Use effects-based standards and activity status to avoid significant adverse effects; require character/heritage compatibility at edges.

Table: Ngaati Te Ata Waiohū – Focus Areas

Key Topic	Key Issues	NTA Priority Focus	Priority Level	Relevant RPC Chapters	Commentary
	Inappropriate development without sufficient infrastructure	- Align development with infrastructure needs: ensure new development is paired with adequate water and waste systems to prevent strain on existing resources and ensure sustainability. - Protect public health and the environment: design and implement waste and water management systems that safeguard public health, reduce pollution, and protect ecosystems.			- New developments must be paired with proper water and waste systems from the outset to prevent overloading existing services and support sustainable growth. - Proper waste and water management is vital for community health and environmental protection, reducing risks like pollution and disease.
Water security / Infrastructure / Managed Retreat	- Marae and rural whānau face unreliable and insufficient water supply, leaving them vulnerable to droughts, floods, and other climate hazards. - Marae and rural whānau face limited emergency response capacity, with poor access to services, evacuation routes, and resources during hazard events.	Strengthen protections and co-design resilient water infrastructure and strengthen emergency response whānau to reduce vulnerability to droughts, floods and hazard events.	High	Infrastructure / Stormwater / Natural Hazards	- Fix historic gaps in water and infrastructure services for marae and rural whānau. - Strengthen emergency services and planning for hazards events. - Integrate managed retreat provisions, where appropriate that protect marae, cultural sites, and ancestral ties to whenua. - Include policies to improve water and wastewater servicing for marae and emergency services.
	Managed retreat planning does not adequately provide for marae and rural whānau, risking the loss of ancestral connection to whenua and cultural sites	Ensure managed retreat provisions protect marae, cultural sites, and ancestral ties to whenua, with solutions co-designed alongside iwi and whānau.	Essential	Infrastructure / Stormwater / Natural Hazards	Water equity for marae and whānau is a longstanding gap. Climate-driven flood and hazard risks make resilient, co-designed infrastructure and emergency access critical. Embedding this into hazard provisions is essential.
	- Stormwater runoff and large paved areas are causing flooding, pollution, and damage to waterways. - Aquifers are being depleted, reducing groundwater supplies and threatening long-term water security	- Restrict intensification in flood-hazard areas; - Protect aquifers and surface water which are over-allocated, placing increasing pressure on the Waikato River and aquifers to meet growing demand. The expansion of agricultural activities such as avocado orchards, is exacerbating the strain of water consumption.	Essential	Infrastructure / Stormwater / Three Waters / Network Utilities / Natural Hazards / Coastal Erosion/Flooding	- Strong action words like co-design, deliver, restrict, and protect, makes hazard planning clearer, more equitable, and more resilient. - Tie intensification to infrastructure capacity and hazard tolerances; - It is noted that aquifer management is outside the current scope and can be addressed in the full AUP review process scheduled for 2026.
Early and ongoing Mana Whenua engagement	Mātauranga Māori overlooked in assessments	Require early engagement and integration of mātauranga Māori	Essential	Consultation / Decision-making / Hazard planning	Engagement must be continuous, with mātauranga embedded in assessments, not treated as an afterthought.
	Lack of formal iwi governance in hazard planning	- Current processes exclude iwi from decision-making. - Formal co-governance and s33 RMA transfers are required to embed Tino rangatiratanga.	Critical	Consultation / Decision Making / Governance	Without structured engagement and co-governance, mana whenua cannot exercise Tino rangatiratanga. s33

Table: Ngaati Te Ata Waiohū – Focus Areas

Key Topic	Key Issues	NTA Priority Focus	Priority Level	Relevant RPC Chapters	Commentary
					RMA transfers and mandatory mātauranga Māori integration are key mechanisms.
	Insufficient engagement processes; Mātauranga Māori absent from assessments.	- Mandate pre-application hui and CIA triggers in overlays; - Document how mātauranga Māori shaped s32/s42A reports.	Critical	Information Requirements / Consultation / Engagement / Assessment Criteria / Governance / Decision-making	- Engagement must be a mandated (not optional). How: selective situations i.e., impacts to Sites of significance, Paa, urupaa, marae, coastal development, new infrastructure. - Document outcomes to evidence Treaty compliance and reduce risk of culturally harmful decisions.
Recognition of wider Sites and Places of Significance	High risk to unrecorded wāhi tapu and ancestral sites	Apply precautionary protections until sites are formally scheduled	High	Heritage / Archaeology / Sites of Significance	Interim protection mechanisms needed to prevent irreversible cultural loss.
	Unscheduled wāhi tapu/urupā at risk during development; scheduled urupā within residential zones need buffers.	- Apply precautionary protections until scheduling is complete; - Retain non-complying status for buildings near urupā; - Map protective buffers.	High	Sites of Significance Schedule / Historic Heritage / Archaeology / Accidental Discovery / Heritage Alerts	- Apply interim controls to prevent irreversible damage; - Expedite scheduling pipeline with mana whenua evidence to strengthen permanent protections. - Retain non-complying status for new buildings near urupaa.
	Formal recognition of Mana Whenua role in hazard planning, with iwi-led climate resilience through integrated in Shoreline Adaption Plans i.e., Awhitu, Manukau North, South and East, Pahurehure Inlet, Tāmaki River for the protection of the Waitemata and Manukau Harbours.	Coastal environment risks from inappropriate land use or development including: - Coastal erosion and habitat loss - Increased vulnerability to storm surges and flooding - Damage to sites and ancestral lands. - Disruption of natural coastal processes - Loss of biodiversity and ecosystem services.	High		- Implement sustainable land use and coastal protection strategies by enhancing natural buffers (e.g., mangroves, salt marshes) to mitigate erosion, protect ecosystems, and reduce vulnerability to flooding and storm surges. - Prioritise the protection and restoration of cultural heritage sites alongside critical biodiversity and ecosystem services to safeguard ancestral lands and maintain natural coastal processes. - Promote nature-based solutions over hard engineering to preserve coastal ecosystems, support conservation efforts, and foster resilience in communities and the environment.
	Loss of kai sovereignty	- Interim protection mechanisms are needed to prevent loss of unscheduled wāhi tapu and urupā. - Mahinga kai and cultural practices should be scheduled as significant values.	High	Heritage / Sites of Significance / Ecology	- Interim protections are necessary for unscheduled sites. - Mahinga kai and cultural practices should be explicitly acknowledged and protected to restore and strengthen kai sovereignty.
Embedding Te Tiriti and Statutory obligations / Mana Whenua Decision making	Current provisions fail to uphold Treaty responsibilities	Explicitly reference Te Tiriti principles and active protection obligations	Critical	Strategic Objectives / Treaty Provisions	A statutory gap; iwi authority must be formally recognised to give effect to Tino rangatiratanga.

Table: Ngaati Te Ata Waiohwa – Focus Areas

Key Topic	Key Issues	NTA Priority Focus	Priority Level	Relevant RPC Chapters	Commentary
	Threats to statutory acknowledgment areas and WAI claims	Hazard overlays must not undermine Treaty Settlement outcomes. Active protection of statutory acknowledgements is required in objectives and policies.	Critical	Treaty Settlement Land / Statutory Acknowledgements: Objectives and Policies	Treaty Settlement outcomes risk being undermined by hazard overlays. Active protection and statutory acknowledgements must be embedded in objectives and policies. This is a statutory compliance issue.
	Treaty settlement and statutory acknowledgement sensitivity; Inadequate visibility of Te Tiriti obligations.	- Uphold and protect Treaty settlement obligations including RFR land, while ensuring the sensitive management of surplus land not subject to Te Tiriti obligations. - Require active protection of statutory acknowledgements; - Embed Te Tiriti obligations within decision-making, policies, and planning frameworks, ensuring clear visibility and active Māori engagement to uphold the principles of partnership, protection, and participation.	Moderate	RPS Mana Whenua Chapter / Strategic Objectives & Policies / Treaty Settlement Land / Statutory Acknowledgements	- This is a statutory compliance matter. - Insert Treaty provisions and require partnership approaches to withstand legal/appeal scrutiny. - Initiate collaborative decision-making processes through co-governance frameworks, RMA power transfers (s33), or joint management agreements (s36B) to enable shared responsibility and effective for cultural heritaeg and hazard planning.
Alignment with National and Regional Instruments	Car-dependent growth, weak climate alignment	Require consistency with NPS-UD, NPS-FM, NZCPS, RPS, and Council’s Climate Action Plan	Moderate	Urban Growth / Transport / Climate	Ensures plan change aligns with national direction and avoids contradictions in policy.
	Planning barriers to iwi-led adaptation; need for alignment with NES, NPS, RPS	Current rules create barriers to Māori land development. Aligning with NPS-FM, NPS-IB, NZCPS, NES-Papakāinga is required for compliance and consistency.	Moderate – High	National Direction / Regional Policy Statement / Māori land provisions	- Natural Hazards must align with national direction (NPS-FM, NPS-IB, NZCPS, NES-Papakāinga). - Current provisions create barriers to Māori land development; these should be removed to give effect to national policy intent.
	Overlay vulnerability under intensification; Inconsistent alignment with national direction and RPS; Risk of car-dependent growth.	- Retain overlays as Qualifying Matters; - Cross-reference NPS-UD, NPS-FM, NPS-IB, NZCPS; - Ensure growth aligns with RPS and climate strategies.	Moderate	National Direction Integration; Regional Policy Statement; Urban Growth / Transport; Climate / Coastal	- Retain overlays and ensure explicit alignment across instruments. This reduces litigation risk and supports coherent growth and resilience. - Map QM boundaries clearly; - Cross-reference NPS-UD, NPS-FM, NPS-IB, NZCPS; - Retain SEA/ONF/SOS overlays.

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Matthew Gouge

From: Chloe Trenouth <Chloe@ctconsulting.co.nz>
Sent: Tuesday, 9 September 2025 11:05 am
To: Matthew Gouge
Subject: Re: Draft Replacement Plan Change - Te Ākitai Waiohū feedback
Follow Up Flag: Follow up
Flag Status: Flagged

Kia ora Matt,

Thank you for sharing the draft replacement plan change (RPC) information with Te Ākitai Waiohū for feedback. I have reviewed this information and discussed it with Karen Wilson, and provide the following feedback on behalf of Te Ākitai Waiohū.

The following information has been provided and reviewed:

- Zoning maps
- Chapter E39 Subdivision - Rural
- Chapter E36 Natural hazards and flooding
- Chapter J - Definitions
- Chapter H - Residential zones
- RPC Whakarāpoto

Te Ākitai Waiohū appreciates the opportunity to review the draft RPC and the planning resource provided, but is concerned about the short two-week timeframe to provide feedback. It is not possible to give the draft RPC meaningful consideration in this timeframe, and Te Ākitai Waiohū is concerned that the Council also does not have sufficient time to address detailed feedback. Therefore, Te Ākitai Waiohū has focused on the key issues raised in their submission to PC78 and looked over the relevant natural hazards-related provisions to provide the following high-level feedback on the draft RPC:

The following aspects of the draft RPC are supported by Te Ākitai Waiohū:

- Removal of MDRS around Pukekiwiriki Paa and Pararēkau Island.
- Retention of Maunga Viewshafts and Height Sensitive Areas.
- Proposed amendments to Mana Whenua Cultural Heritage definition to recognise unscheduled sites.
- Identifying existing natural resources protection overlays as qualifying matters.
- Assessment of three waters capacity for residential intensification.
- Applying the Single House Zone in areas of high-risk hazards.
- Te Wāhi Hunuku subdivision provisions are supported in principle as a first step in recognising the potential need of Mana Whenua.

Te Ākitai Waiohū raises the following concerns with the draft RPC:

- Walkable catchments of 800m are not supported because not all people are able-bodied.
- Use of the terminology 'mana whenua cultural heritage and values' when the definition of 'Mana Whenua Cultural Heritage' incorporates values and associations.

It is important that development in areas of significant hazard risks is avoided, that people are aware of the potential hazard risks that they may be subject to and that we learn the lessons from the extreme weather events of

2023. Impacts and effects of hazard risks are broader than the environment and property and may have significant impacts on the health and well-being of the people who are affected.

Te Ākitai Waiohua is not concerned about reduced Special Character Areas but would be concerned if these were increased.

Please note that this feedback is provided as a means for the participation and ongoing involvement of Te Ākitai Waiohua and does not constitute written approval of the plan change.

Ngā mihi | Regards

Chloe Trenouth

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