



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

to the Auckland Unitary Plan (Operative in part)

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

Aircraft Noise Overlay

EVALUATION REPORT

Table of Contents

Executive Summary.....	3
1. Introduction	4
2. Integrated evaluation for existing qualifying matters	5
3. Issues.....	7
4. AUP approach to managing qualifying matter	8
Objectives and Policies (existing).....	9
Rules and methods (existing).....	11
5. Development of Options.....	11
Consequences for development capacity.....	12
Evaluation of options	13
Analysis	17
Risks or acting or not acting.....	18
Effectiveness and efficiency.....	18
Description of how the qualifying matter is to be implemented	18
Overall conclusion.....	18
Information Used	19
Consultation summary.....	20

Executive Summary

This report discusses the implication of applying the provisions in D24. Aircraft Noise Overlay in the Auckland Unitary Plan (Operative in Part), as a qualifying matter to modify the requirements of Schedule 3C Clause 4 and Policy 3 of the National Policy Statement on Urban Development 2020 – Updated May 2022 (**NPS-UD**) in urban zones to be less enabling of development.

The AUP maps clearly show where the Aircraft Noise Overlay applies; the overlay is shown by the Aircraft Noise Overlay and associated brown hatched areas.

The high and moderate aircraft noise areas in the Aircraft Noise Overlay associated with operation of the Auckland International Airport are qualifying matters which have been specified in sections 77I(e), in accordance with Schedule 3C cls.8(1)(a)) of the Resource Management Act 1991 (**RMA**) as a matter required for the purpose of ensuring the safe and efficient operation of nationally significant infrastructure (hereon referred to as the **Auckland Airport HANA** and **Auckland Airport MANA**).

The spatial extent of the Auckland Airport HANA and Auckland Airport MANA are shown in the AUP Aircraft Noise Overlay maps by the two innermost brown hatched areas emanating from Auckland International Airport, with innermost being the HANA, followed by the MANA.

Auckland Council is required to recognise and provide for the national significance of the Auckland International Airport. This includes protecting the Auckland International Airport from reverse sensitivity effects by managing the subdivision of land and location of activities sensitive to aircraft noise in areas of high cumulative noise around the Auckland International Airport, so that the continued operation of the Airport is not compromised and reverse sensitivity issues are addressed.

Therefore, it is considered inappropriate for the densities enabled in Schedule 3C cl.(4)(1)(b) or (c) of the RMA and Policy 3 of the NPS-UD to apply to properties located within the Auckland Airport HANA and Auckland Airport MANA.

The effect on housing supply and/or capacity of applying the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay as qualifying matters on areas of Auckland subject to Schedule 3C cl.4 of the Resource Management Act 1991 and Policy 3 of the NPS-UD will depend on the area of land and where it is located. This restriction exists within the operative provisions of Chapter D24 in the AUP and therefore it is considered that there is a low to medium cost of applying the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay as qualifying matters.

However, there is a medium to high benefit in applying the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay as qualifying matters through the existing provisions of Chapter D24 Aircraft Noise Overlay, and applying a zoning response, to ensure that the Auckland International Airport is protected from reverse sensitivity effects by managing the subdivision of land and location of activities sensitive to aircraft noise in areas of high cumulative noise around the Auckland International Airport.

1. Introduction

1. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the RMA for PC120 to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. The background to and objectives of PC120 are discussed in the overview report, as is the purpose and required content of section 32 and Schedule 3C evaluations.
3. This report discusses the implications of applying the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay as qualifying matters to the requirements of clause 4(1)(b) or (c) of Schedule 3C of the RMA and the implementation of policy 3 of the NPS-UD. This report also evaluates the provisions which have been included in PC120 relating to the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay.
4. The Council may make the relevant building height or density requirements of clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD less enabling of development in relation to any zone in an urban environment only to the extent necessary to accommodate 1 or more of the following qualifying matters present:
 - (a) a matter listed in section 77I(a) to (i);
 - (b) any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD, inappropriate in an area but only if subclause (4) of clause 8 of Schedule 3C is satisfied.
5. Under clause 8(2) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(a) or (1)(b) of clause 8:
 - (a) demonstrate why the Council considers:
 - (ii) that the area is subject to a qualifying matter; and
 - (iii) that the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or policy 3 for that area; and
 - (b) assess the impact that limiting development capacity, building height or density (as relevant) will have on the provision of development capacity; and
 - (c) assess the costs and broader impacts of imposing those limits.
6. Under clause 8(4) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must, in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(b) (an "other" qualifying matter), also:
 - (a) identify the specific characteristic that makes the level of development specified by clause 4(1)(b) or (c) or policy 3 inappropriate in the area; and
 - (b) justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and

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

2. Integrated evaluation for existing qualifying matters

8. For the purposes of PC120, evaluation of the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay as qualifying matters has been undertaken in an integrated way that combines section 32 and Schedule 3C of the RMA requirements. The report follows the evaluation approach described in the table below.
9. The preparation of this report has involved the following:
- a. assessment of the AUP to identify any relevant provisions that apply to this qualifying matter
 - b. development of draft amendments to the operative district plan provisions of the AUP to implement this matter as a Qualifying Matter in accordance with the requirements of Schedule 3C of the RMA
 - c. review of the AUP to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter
 - d. review of the AUP Maps to assess the spatial application of this qualifying matter
 - e. section 32 options analysis for this qualifying matter and related amendments

- f. consideration of the planning evidence provided for Topic 009R Aircraft Noise Overlay Qualifying Matter for the Plan Change 78 Metropolitan Centres Outstanding Matters topic hearing.
10. The scale and significance of the issues is assessed to be medium.
11. This section 32/Schedule 3C evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

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

Standard sec 32 steps	Plus clause 8 Schedule 3C steps
Issue Define the problem- provide overview/summary providing an analysis of the qualifying matter	Identify whether an area is subject to an existing qualifying matter (a qualifying matter referred to in clause 8(1)(a) of Schedule 3C of the RMA that is operative in the AUP when the Auckland housing planning instrument (PC120) is notified) and describe the existing qualifying matter. Identify by location (for example, by mapping) where an existing qualifying matter applies. [refer to Section 3 of this report]
Identify and discuss objectives / outcomes	Identify relevant RPS / district level objectives and policies. Specify the alternative heights or densities (as relevant) proposed for those the area where the existing qualifying matter applies. [refer to Section 4 of this report]
Identify and screen response options	Consider a range of reasonably practicable options for achieving the objectives including alternative standards or methods for these areas having considered the particular requirements in clause 4 of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD and assess the efficiency and effectiveness of the provisions. [refer to Section 5 below]
Collect information on the selected option(s)	Describe in general terms for a typical site in the identified areas the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been provided by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD. [refer to Section 5 of this report]

Evaluate option(s) - environmental, social, economic, cultural benefits and costs	Provide an assessment of the benefits and costs of the options in the light of the new objectives introduced by the NPS-UD relating to well-functioning urban environments. [refer to Section 5 below]
Overall judgement as to the better option (taking into account risks of acting or not acting)	Conclusion as to the implications of the qualifying matter for development capacity to be enabled by NPS-UD in the areas where the qualifying matter applies. [refer to Section 5 below]

3. Issues

12. The qualifying matters being evaluated are the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay and these has been identified as such under the following sections of the RMA:
 - a. Schedule 3C, cl.8(1)(a) – a matter specified in sections 77I(a) to (i):
 - i. section 77I(e) – the Auckland International Airport is also identified in Section 1.4 Interpretation of the NPS -UD as being ‘nationally significant infrastructure’ which is a qualifying matter required for the purpose of ensuring the safe and efficient operation of nationally significant infrastructure

Overview of the qualifying matter

13. The Auckland International Airport is a nationally and regionally significant component of Auckland and New Zealand’s transport infrastructure and trade network. This facility is important in serving and supporting local, regional, and national business opportunities, and providing for the social and economic well-being of Auckland.
14. Auckland Council is required to recognise and provide for the national significance of the Auckland International Airport. This includes protecting the Auckland International Airport from reverse sensitivity effects by managing the subdivision of land and location of activities sensitive to aircraft noise in areas of high cumulative noise around the Auckland International Airport, so that the continued operation of the Airport is not compromised and reverse sensitivity issues are addressed.
15. The purpose of the Aircraft Noise Overlay is to manage the subdivision of land and location of activities sensitive to aircraft noise in areas of high cumulative noise around the region’s airports and airfields, so that the continued operation of the airports and airfields is not compromised and reverse sensitivity issues are addressed.

16. This qualifying matter seeks to protect the Auckland International Airport from reverse sensitivity effects by managing the subdivision of land and location of activities sensitive to aircraft noise in areas of high cumulative noise around the Auckland International Airport, so that the continued operation of the Airport is not compromised and reverse sensitivity issues are addressed.
17. The AUP's mapped location and extent of the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay is shown by brown hatched areas emanating from Auckland International Airport (innermost being the HANA, followed by the MANA).

Location of the existing qualifying matter

18. In PC120, the Auckland Airport HANA and Auckland Airport MANA qualifying matters apply to areas of Auckland which are subject to the requirements of Schedule 3C of the RMA and Policy 3 of the NPS-UD (refer to Table 2 below). As shown below in Table 2, the qualifying matter does not apply to the walkable catchments listed in Schedule 3C cls.4(1)(b) or (c) as these walkable catchments are not currently subject to the Auckland Airport HANA and Auckland Airport MANA in the AUP.
19. The operative provisions of D24. Aircraft Noise Overlay in the AUP will continue to apply to areas of Auckland outside of the areas subject to the statutory requirements in Schedule 3C of the RMA and Policy 3 of the NPS-UD.

Proposed walkable catchment	Relevant zone/proposed zone
Puhinui train station	Residential-Single House, Residential – Mixed Housing Suburban, Residential – Mixed Housing Urban, Residential -Terrace Housing and Apartment Buildings, Business – Neighbourhood Centre, Business – Light Industry, Open Space – Sport and Active Recreation
Manukau bus and train station/Manukau Metropolitan Centre	Residential – Mixed Housing Suburban, Residential - Terrace Housing and Apartment Buildings, Business – Metropolitan Centre, Business – General Business, Business – Light Industry, Business – Heavy Industry, Business – Mixed Use, Special Purpose - School

Table 2: Proposed walkable catchments in PC120 which are subject to the Auckland Airport HANA and Auckland Airport MANA qualifying matters

4. AUP approach to managing qualifying matter

20. The management approach in the AUP to recognise and provide for the national and regional significance of Auckland International Airport operations includes:
 - a. the identification and provision of the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay;

- b. associated objectives, policies, and rules in AUP Chapters B3, D24 Aircraft Noise Overlay, and I412 Flat Bush Precinct within which the Auckland Airport MANA traverses, to:
 - avoid new activities sensitive to aircraft noise (**ASAN**) being established in the Auckland Airport HANA and manage the actual and potential effects of additions or alterations for existing ASAN within the Auckland Airport HANA on Auckland International Airport operations.
 - avoid the rezoning of land and establishing new areas in the Auckland Airport MANA for ASAN and manage the actual and potential effects of intensifying ASAN within the Auckland Airport MANA on Auckland International Airport operations
 - c. designations 1100 and 1102 identified in the AUP maps and Chapter K: Designations and Schedules for Auckland International Airport's infrastructure and operations.
21. This approach in the AUP was extensively addressed through the Proposed AUP hearings process in 2014 – 2016.

Objectives and Policies (existing)

22. The AUP contains the following objectives and policies at the regional and district-level that support the Auckland Airport HANA and Auckland Airport MANA qualifying matters:

B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy

23. AUP Chapter B3 associated with the Auckland Regional Policy Statement (**RPS**) contains the following objective (B3.2.1(6)) and policies (B3.2.2(4)-(5)) which address reverse sensitivity effects on infrastructure:
- (6) *Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development*
 - ...
 - (4) *Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure*
 - (5) *Ensure subdivision, use and development do not occur in a location or form that constrains the development, operation, maintenance and upgrading of existing and planned infrastructure.*
24. Chapter D24 of the AUP contains the following district-level objectives (D24.2(1) and policies (D24.3(1)-(5)) which address reverse sensitivity effects on airports, including policies specific to managing such effects on Auckland International Airport operations:

Chapter D24 Aircraft Noise Overlay

(1) Airports and airfields are protected from reverse sensitivity effects.

...

(1) Avoid the establishment of new activities sensitive to aircraft noise (except tertiary education facilities) within the 65dB Ldn noise contour in the Aircraft Noise Overlay.

(2) Avoid the establishment of new tertiary education facilities and additions or alterations to existing activities sensitive to aircraft noise (other than existing dwellings) within the 65dB Ldn noise contour in the Aircraft Noise Overlay unless all habitable rooms and all learning, amenity and recreation spaces on site are located inside buildings and achieve an internal noise environment of 40dB Ldn.

(3) Avoid establishing residential and other activities sensitive to aircraft noise at:

....

(b) Auckland International Airport: within the area between the 60dB Ldn and 65dB Ldn contours, unless the effects can be adequately remedied or mitigated through restrictions on the numbers of people exposed to aircraft noise in the external environment through zoning and density controls and through providing acoustic treatment (including mechanical ventilation) of buildings containing activities sensitive to aircraft noise

(4) In relation to Auckland International Airport, avoid establishing new residential areas (except within the area included within I412 Flat Bush Precinct) or other areas that would contain activities sensitive to aircraft noise by rezoning land within the area between the 60dB Ldn and 65dB Ldn noise contours.

(5) Manage residential intensification and activities sensitive to aircraft noise within areas identified for accommodating urban growth in a way that avoids reverse sensitivity effects as far as practicable, including reverse sensitivity effects between those land uses and such effects on Auckland International Airport..., and that avoids, remedies or mitigates adverse aircraft noise effects on people and communities

25. Subdivision, use, and development is managed in the Auckland Airport HANA and Auckland Airport MANA so that it achieves the above objectives and policies.

26. It should be noted that there are additional objectives and policies which apply to sites in the Flat Bush Precinct due to being traversed by the Auckland Airport MANA, and as they are applied in a site-specific manner, they have not been noted here.

27. There are no amendments proposed to RPS and district-level objectives and policies, in response to either clause 4 of Schedule 3C of the RMA or policy 3 of the NPS-UD.

Rules and methods (existing)

28. New ASAN in the HANA associated with Auckland International Airport operations have a prohibited activity status while additions or alterations for existing ASAN within the HANA have non-complying activity status (exception to this are additions or alterations to existing dwellings which have a restricted discretionary activity status).
29. New ASAN in the MANA associated with Auckland International Airport operations have a discretionary activity status (subject to complying with relevant development standards), while new dwellings (or any subdivision for new dwellings) and additions or alterations to existing dwellings are permitted (both activity statuses subject to complying with relevant development standards, with the latter in relation to new dwellings being subject to not exceeding specified density thresholds).
30. There are no amendments proposed to district-level rules in AUP Chapter D24 Aircraft Noise Overlay, in response to either clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD.

5. Development of Options

Section 32 of the RMA requires an examination of the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The overall objective (purpose of the proposal) of Plan Change 120 has two key objectives – it proposes:

- measures to better manage significant risks from natural hazards region-wide; and
- an amended approach to managing housing growth as a result of no longer incorporating the medium density residential standards (MDRS), but providing for intensification in a way that complies with clause 4 of Schedule 3C of the RMA by:
 - providing at least the same amount of housing capacity as would have been enabled if Plan Change 78: Intensification (PC78), as notified, was made operative, including by providing for additional intensification along selected Frequent Transit corridors and modifying zoning in suburban areas through an amended pattern of Residential - Mixed Housing Urban and Mixed Housing Suburban zones;
 - enabling the building heights and densities specified in clause 4(1)(b) and (c) of Schedule 3C of the RMA within at least the walkable catchments of Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Avenue and Mount Albert Stations;
 - giving effect to Policy 3 (c) and (d) of the National Policy Statement on Urban Development 2020 (NPS-UD) through intensification in other walkable catchments and land within and adjacent to neighbourhood, town and local centres;

- enabling less development than that required by clause 4(1)(b) and (c) of Schedule 3C or Policy 3 of the NPS-UD where authorised to do so by clause 8 of schedule 3C.

Section 32 requires a range of options to be considered.

31. The two options that have been evaluated in the section 32 and Schedule 3C assessment for the Auckland Airport HANA and Auckland Airport MANA qualifying matters are:
 - **Option 1:** Apply heights and density requirements in Schedule 3C of the RMA and Policy 3 of the NPS-UD without applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters i.e., rely on the operative provisions of D24 Aircraft Noise Overlay in the AUP
 - **Option 2:** Apply the Auckland Airport HANA and Auckland Airport MANA as qualifying matters in full i.e., retain the current Auckland Airport HANA and Auckland Airport MANA provisions in the AUP and apply a zone (not including sites in the Flat Bush Precinct):
 - in the Auckland Airport HANA which includes, but does not extend beyond, the Residential – Single House zone, and retain Residential – Single House zone and Business zones on properties where this is the operative zone in the AUP.
 - in the Auckland Airport MANA which includes, but does not extend beyond, the Residential – Mixed Housing Urban zone, and retain Residential – Single House zone, Residential – Mixed Housing Suburban zone, Residential – Mixed Housing Urban zone and Business zones on properties where this is the operative zone in the AUP.

Consequences for development capacity

32. The consequences for the provision of development capacity by accommodating the Auckland Airport HANA and Auckland Airport MANA qualifying matters will vary depending on the area of sites encompassed by the qualifying matters in the Aircraft Noise Overlay.
33. Notwithstanding the above, it is considered that the Auckland Airport HANA and Auckland Airport MANA qualifying matters will have a minor effect on the development potential enabled by Schedule 3C of the RMA and Policy 3 of the NPS-UD as they apply to a small percentage of land within Auckland's urban environment and so will not impact on the ability of residential and non-residential zones across the region to provide for a variety of housing types and sizes.

Evaluation of options

34. To determine the most appropriate response for the Auckland Airport HANA and Auckland Airport MANA qualifying matters, each of the options needs to be evaluated in the context of Schedule 3C of the RMA and Policy 3 of the NPS-UD.

Table 3 Evaluation of options

Qualifying matter	Option 1 - Do not apply the qualifying matter	Option 2 – Apply the qualifying matter and a zone response
Costs of applying QM – housing supply / capacity	No cost The Auckland Airport HANA and Auckland Airport MANA would not be applied as qualifying matters or require a zoning response in this option. Therefore, there is no cost related to housing supply and/or capacity through not applying the qualifying matters and recommended zoning responses. However, there would still be restrictions as the provisions in Chapter D24 Aircraft Noise Overlay of the AUP would still apply.	Low cost The Auckland Airport HANA and Auckland Airport MANA qualifying matters would apply to a specific number of properties where the requirements of Schedule 3C of the RMA and Policy 3 of the NPS-UD applies. Housing supply and/or capacity could be affected as the recommended zoning responses in the Auckland Airport HANA and Auckland Airport MANA limit density in accordance with AUP Chapter D24 Aircraft Noise Overlay provisions However, as the Auckland Airport HANA and Auckland Airport MANA apply to a small percentage of land within Auckland's urban environment, it is considered that there will only be a minor cost in terms of housing supply / capacity.
Costs: Social	High cost Not applying the Auckland Airport HANA and Auckland Airport MANA, and the recommended zoning responses, as qualifying matters may enable densities required by Schedule 3C of the RMA and Policy 3 of the NPS-UD. The increased exposure of people and communities to high levels of aircraft noise over a sustained period of time would also have a	Low cost The Auckland Airport HANA and Auckland Airport MANA qualifying matters, and the recommended zoning responses, manages the effects of Auckland Airport operations on sites in the Auckland Airport HANA and Auckland Airport MANA by limiting the density requirements of Schedule 3C of the RMA and Policy 3 of the NPS-UD. Applying the qualifying matters in full by retaining the existing AUP

Qualifying matter	Option 1 - Do not apply the qualifying matter	Option 2 – Apply the qualifying matter and a zone response
	significant adverse effect on their health of wellbeing.	provisions which give effect to them achieves a well-functioning urban environment and protects the Auckland International Airport from reverse sensitivity effects which would be generated by implementing the densities enabled by Schedule 3C of the RMA and Policy 3 of the NPS-UD within the Auckland Airport HANA and Auckland Airport MANA. When compared with the densities enabled by Schedule 3C of the RMA and Policy 3 of the NPS-UD, this also means that there are less people and ASAN exposed to high levels of aircraft noise over a sustained period of time which would otherwise have a significant adverse effect on their health of wellbeing.
Costs: Economic (not otherwise covered by housing capacity issues)	Low cost The Auckland Airport HANA and Auckland Airport MANA and associated provisions would not be identified as qualifying matters and therefore not require a zoning response. Consequently, this option would not impose an economic cost as the Auckland Airport HANA and Auckland Airport MANA provisions in AUP Chapter D24 Aircraft Noise Overlay would still apply. However, this option would have the actual and/or potential effect of compromising the efficient operation of the Auckland International Airport as both a nationally and regionally significant component of critical transport infrastructure which is a major contributor to national and regional GDP.	Low cost The ability to develop sites within the overlay at the densities specified by clause 4 of Schedule 3C and/or by policy 3 of the NPS-UD would be limited to those specified in the Auckland Airport HANA and Auckland Airport MANA provisions. However, this option would have the actual and/or potential effect of protecting the efficient operation of the Auckland International Airport as both a nationally and regionally significant component of critical transport infrastructure which is a major contributor to national and regional GDP. This is due to the option creating a clear and consistent planning framework for affected landowners of sites in the Auckland Airport HANA and Auckland Airport MANA resulting from the recommended

Qualifying matter	Option 1 - Do not apply the qualifying matter	Option 2 – Apply the qualifying matter and a zone response
	This is due to the option creating an unclear and inconsistent planning framework for affected landowners of sites in the Auckland Airport HANA and Auckland Airport MANA resulting from the underlying zoning suggesting residential intensification can occur when the Auckland Airport HANA provisions either prohibits it or is subject to density restrictions in the Auckland Airport MANA which are more stringent than the underlying zone.	zoning achieving a degree of alignment with density provisions which apply to sites in the Auckland Airport HANA and Auckland Airport MANA.
Costs: Environmental	No/low cost There is no to low cost associated with not applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters as the associated AUP Chapter D24 Aircraft Noise Overlay provisions already provide a baseline of effects, noting they would continue to apply. However, applying the densities specified by clause 4 of Schedule 3C and/or by policy 3 of the NPS-UD would increase the exposure of people and communities to high levels of aircraft noise over a sustained period of time, thereby having a significant adverse effect on their health of wellbeing and this would effectively negate the social benefits associated with increasing housing supply/capacity, particularly when the additional houses detract rather than contribute towards a well-functioning urban environment that supports the health and wellbeing of people and communities.	Low cost There is low cost associated with applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters as the associated AUP Chapter D24 Aircraft Noise Overlay provisions already provide a baseline of effects. However, applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters in full by retaining the existing AUP provisions which give effect to them would minimise the exposure of people and communities to high levels of aircraft noise over a sustained period of time, thereby having a significant positive effect on their health of wellbeing and contributing towards a well-functioning urban environment.

Qualifying matter	Option 1 - Do not apply the qualifying matter	Option 2 – Apply the qualifying matter and a zone response
Benefits of applying the QM - social	Low benefit Not applying the Auckland Airport HANA and Auckland Airport MANA, and the recommended zoning responses, as qualifying matters and instead applying densities required by Schedule 3C of the RMA and Policy 3 of the NPS-UD would increase the exposure of people and communities to high levels of aircraft noise over a sustained period of time would also have a significant adverse effect on their health of wellbeing. This would effectively negate the social benefits associated with increasing housing supply/capacity, particularly when the additional houses detract rather than contribute towards a well-functioning urban environment that supports the health and wellbeing of people and communities.	High benefit Applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters in full by retaining the existing AUP Chapter D24 Aircraft Noise Overlay provisions which give effect to them would minimise the exposure of people and communities to high levels of aircraft noise over a sustained period of time, thereby having a significant positive effect on their health of wellbeing and contributing towards a well-functioning urban environment.
Benefits - economic	Low benefit There is low benefit in not applying the Auckland Airport HANA and Auckland Airport MANA and associated provisions as qualifying matters. There would still be restrictions on subdivision, development, and use as the associated AUP Chapter D24 Aircraft Noise Overlay provisions would still apply.	High benefit Applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters and the recommended zoning response would have the actual and/or potential effect of protecting the efficient operation of the Auckland International Airport as both a nationally and regionally significant component of critical transport infrastructure which is a major contributor to national and regional GDP.

Qualifying matter	Option 1 - Do not apply the qualifying matter	Option 2 – Apply the qualifying matter and a zone response
Benefits – environmental	Low benefit There is low benefit in not applying the Auckland Airport HANA and Auckland Airport MANA and associated provisions as qualifying matters, along with the recommended zoning response. The associated AUP Chapter D24 Aircraft Noise Overlay provisions already provide a baseline of effects, noting they would continue to apply.	High benefit Applying the Auckland Airport HANA and Auckland Airport MANA qualifying matters in full by retaining the existing AUP Chapter D24 Aircraft Noise Overlay provisions which give effect to them would minimise the exposure of people and communities to high levels of aircraft noise over a sustained period of time, thereby having a significant positive effect on their health of wellbeing and contributing towards a well-functioning urban environment.

Analysis

35. Option 2 is the preferred option. The retention of the current Auckland Airport HANA and Auckland Airport MANA provisions in the AUP and identifying them as qualifying matters, along with applying the recommended zone responses is considered appropriate.
36. The Auckland Airport HANA and Auckland Airport MANA provisions in the AUP are considered to be sufficient in protecting Auckland International Airport operations from reverse sensitivity effects.
37. If properties located within the Auckland Airport HANA and Auckland Airport MANA were to be upzoned, to meet the requirements of Schedule 3C of the RMA and Policy 3 of the NPS-UD, this would increase the exposure of people and communities to high levels of aircraft noise over a sustained period of time would also have a significant adverse effect on their health of wellbeing. This would effectively negate the social benefits associated with increasing housing supply/capacity, particularly when the additional houses detract rather than contribute towards a well-functioning urban environment that supports the health and wellbeing of people and communities.
38. Other consequences would be the actual and/or potential effects of compromising the efficient operation of the Auckland International Airport as both a nationally and regionally significant component of critical transport infrastructure which is a major contributor to national and regional GDP.
39. While the AUP provisions should be sufficient in protecting the Aircraft Noise Overlay, upzoning properties to the densities provided in Schedule 3C of the RMA and Policy 3

of the NPS-UD could set an expectation of development capacity that is inconsistent with existing Auckland Airport HANA and Auckland Airport MANA density restrictions which apply in the AUP Chapter D24 Aircraft Noise Overlay provisions.

Risks or acting or not acting

40. Section 32(2)(c) of the Act requires this evaluation to assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. The information about the Airport HANA and Auckland Airport MANA as qualifying matters, including information about the values, location and extent of the mapped Aircraft Noise Overlay is already set out in the Unitary Plan. It is considered that this information is certain and sufficient.

Effectiveness and efficiency

41. Option 2 is an efficient and effective method which achieves the lowest cost in regard to decreasing the potential risk to people's health and safety and the highest benefit in protecting the Auckland International Airport and associated operations from reverse sensitivity effects.

Description of how the qualifying matter is to be implemented

42. The Auckland Airport HANA and Auckland Airport MANA qualifying matters will be implemented through the markup of AUP Chapter D24 Aircraft Noise Overlay. Markups include:
 - a. statements in D24 description that the Auckland Airport HANA and Auckland Airport MANA are qualifying matters in accordance with Schedule 3C cl.4(1)(b) of the RMA and Policy 3 of the NPS-UD;
 - b. annotated references to the Auckland Airport HANA and Auckland Airport MANA as qualifying matters against relevant provisions in AUP Chapter D24 Aircraft Noise Overlay; and
 - c. identification of the Auckland Airport HANA and Auckland Airport MANA as qualifying matters through relevant Aircraft Noise Corridor Overlay notations and recommended zoning responses in the Auckland Airport HANA and Auckland Airport MANA encompassed by the Aircraft Noise Overlay maps.
43. Marking up the operative provisions in AUP Chapter D24 Aircraft Noise Overlay and identifying the relevant zones encompassed by the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay maps is the most efficient and effective method to implement the qualifying matters.

Overall conclusion

44. The Auckland Airport HANA and Auckland Airport MANA qualifying matters are appropriate to modify the requirements of Schedule 3C of the RMA and Policy 3 of the NPS-UD in an any zone in an urban environment to be less enabling of development

than provided in that clause and policy to the extent necessary to accommodate the qualifying matter as a matter specified in sections 771(a) to (i):

- a. section 771(e) – the Auckland International Airport is also identified in Section 1.4 Interpretation of the NPS -UD as being ‘nationally significant infrastructure’ which is a qualifying matter required for the purpose of ensuring the safe and efficient operation of nationally significant infrastructure
45. The effect of the Auckland Airport HANA and Auckland Airport MANA qualifying matters on housing supply and capacity is localised and applies to a small percentage of property parcels in Auckland’s urban environment which are traversed by the Auckland Airport HANA and Auckland Airport MANA and subject to the requirements of Schedule 3C of the RMA and Policy 3 of the NPS-UD. This means that parts of properties not affected by the Auckland Airport HANA and Auckland Airport MANA, or certain development within the Aircraft Noise Overlay, may still be enabled to at least the same amount of housing capacity provided by PC78 (as notified) if it had been made operative.
46. The Auckland Airport HANA and Auckland Airport MANA as qualifying matters can be implemented in a way that best achieves alignment between objectives which give effect to the qualifying matters in the AUP and those specified for Schedule 3C of the RMA and Policy 3 of the NPS-UD.
47. The operative provisions of Chapter D24 Aircraft Noise Overlay in the AUP will continue to apply to any other property subject to the Aircraft Noise Overlay, outside of areas associated with Schedule 3C of the RMA and Policy 3 of the NPS-UD.

Information Used

Name of document, report, plan	How did it inform the development of the plan change
Auckland Unitary Plan (Operative in Part 2016	Chapter D24 Aircraft Noise Overlay identifies the restrictions relating to subdivision, use and development within the overlay. The AUP maps show the location of the Auckland Airport HANA and Auckland Airport MANA in the Aircraft Noise Overlay.
AUP Independent Hearing Panel Evidence and recommendations for: Topic 012 Infrastructure, energy and transport Topic 042 Infrastructure Topic 045 Airports	Supported inclusion of the Aircraft Noise Overlay as a method to, amongst other matters, protect Auckland International Airport from reverse sensitivity effects.
Auckland Council and Auckland International Airport evidence prepared for PC78 Metropolitan	Auckland Council and Auckland International Airport evidence supports the identification of Auckland Airport HANA and Auckland Airport MANA as

Centre Hearings Topics and relevant Qualifying Matters	qualifying matters in AUP Chapter D24 Aircraft Noise Overlay and associated Aircraft Noise Overlay maps which apply in the Manukau Metropolitan Centre.
--	---

Consultation summary

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

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

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