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

to the Auckland Unitary Plan (Operative in part)

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

Maunga Viewshafts and Height and Building Sensitive Areas

EVALUATION REPORT

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1. Executive Summary

1. Plan Change 120 (**PC 120**) proposes to retain the operative Auckland Unitary Plan identification of the Maunga Viewshafts and Height Sensitive Areas Overlay (**MV**s and **HSA**s[1]) described in the Auckland Unitary Plan's Schedule 9, Appendix 20 and on the Auckland Unitary Plan maps. The height of building limitations contained in Chapter D14 of the Auckland Unitary Plan are not proposed to be changed.

2. The provisions in Chapter D14 relating to HSAs need to be modified in part in order to provide for the specific characteristics of the MVs and HSAs. In recognition of proposed upzoning in HSAs those areas are renamed Height and Building Sensitive Areas (**HBSA**s), with controls proposed in Chapter D14 on building coverage and landscaped area that are generally consistent with the controls in the Residential – Single House Zone. These are the same amendments as were proposed in the now withdrawn Plan Change 78 (**PC 78**). Under the revised zonings proposed in PC 120, an overall higher density of development will be possible within HBSAs, however that development will be limited by the (existing) height control and (additional) building controls to recognise the values of identified maunga in those locations. MVs and HSAs are an existing qualifying matter under clause 8(5) of Schedule 3C of the RMA and the modifications in the HBSAs are a new qualifying matter under clause 8(1)(a) of Schedule 3C of the RMA.

3. The higher densities specified by clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 (**Policy 3**) of the National Policy Statement on Urban Development (**NPS-UD**) are considered by the council to be inappropriate in areas covered by a MV and / or a HSA as they would conflict with the sections 6 and 7 of the Resource Management Act 1991 (**RMA**), also taking into account section 8. This report concludes that the MVs and HSAs are a Qualifying Matter and can modify height and density of urban form to allow the council to meet its obligations under Part 2 sections 6, 7 and 8 of the RMA in accordance with sections 31, 72 and 74 of the RMA.

4. Applying the MVs, HSAs and supporting Chapter D14 provisions as a qualifying matter will result in a significant impact on housing capacity, including in some walkable catchments. Building height is limited to two storeys, rather than up to six, 10 or 15 storeys as may have been possible without the Overlay and Chapter D14 provisions (or other overlays that may also apply). Impacts are generally less

[1] Note: In this s32, references to Height Sensitive Areas (HSAs) pertain to the operative plan and its existing height standards. While the geographic extent and height controls of HSAs remain unchanged, the introduction of new standards has necessitated a renaming. These areas are now referred to as Height and Building Sensitive Areas (HBSAs) as part of this plan change to reflect the broader scope of development controls. All references to HBSAs in this s32 incorporate both the existing height standards and the newly introduced standards in HBSAs.

significant outside walkable catchments[2] and other Policy 3 areas[3] where MVs and HBSAs have varying effects on building height.

5. The existing and proposed provisions have been evaluated under clause 8(2) and 8(5) of Schedule 3C and section 32 of the RMA and are considered to be the most appropriate of 5 identified options after having regard to of clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 of the NPS-UD. As MVs and HSAs and the proposed amendments to the Chapter D14 provisions are existing and/or listed qualifying matters, no site specific analysis is required as per clause 8(4) of Schedule 3C of the RMA.

6. For the purposes of PC 120, evaluation of Chapter D14 as a qualifying matter has been undertaken in an integrated way that combines section 32 and Schedule 3C of the RMA requirements. The preparation of this report has involved the following:

   - assessment of the AUP to identify any relevant provisions that apply to this qualifying matter;
   - 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;
   - review of the AUP to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter;
   - review of the AUP Maps to assess the spatial application of this qualifying matter;
   - section 32 options analysis for this qualifying matter and related amendments.

7. The scale and significance of the issues are assessed to be medium to high for the reasons set out below in this report. The scale and significance is assessed as being medium where the effect of this qualifying matter is assessed overall, and high where the effect of this qualifying matter is assessed in localised areas – examples including Maungawhau / Mt Eden, Mt Albert and Mt Wellington.

8. 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.

[2] Outside of walkable catchment areas, MVs, HSAs and the Chapter D14 provisions are recognised as 'constraints' rather than qualifying matters. MVs, HSAs and the Chapter D14 provisions are considered less significant in these areas given that they are not prescribed to be intensified under clause 4(1)(b), (c) and (d) of Schedule 3C of the RMA or Policy 3 of the NPS-UD and do not include the same locational benefits as those areas within walkable catchments of centres, and RTN stops.
[3] Other Policy 3 areas refer to those not specifically referenced for intensification under clause 4(1)(b), and (c) of Schedule 3C of the RMA.

Table 1 Integrated approach for any matter specified in section 77I(a) to (i) and any other matter that makes higher density, as specified by clause 4(1)(b) or Policy 3, of the NPS-UD inappropriate in an area

Standard sec 32 steps	Plus clause 8 Schedule 3C steps
Issue **Define the problem- provide overview/summary providing an analysis of the qualifying matter**	The qualifying matter is the MV / HSA Overlay (AUP Chapter D14). The purpose of the Overlay is to appropriately protect significant views of Auckland's maunga through the use of viewshafts and height sensitive areas. The MV / HSA Overlay is a qualifying matter because it contributes to Auckland's unique identity by protecting the natural and cultural heritage values of significant maunga. The maunga viewshafts and height sensitive areas are identified on the AUP planning maps as an overlay. Their description and values are explained in Schedule 9 and in detail in Appendix 20 to the AUP. The overlay has been in place for over 50 years and has been regularly reviewed over that time.
Identify and discuss objectives / outcomes	There are a number of objectives and policies relevant to MVs and HSAs. A key objective amongst the objectives and policies in B4.3 is B4.3.1(1) '*significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development*'. Development in accordance with clause 4(1)(b) and (c) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD would be contrary to this objective as well as parts of Section 6, 7 and 8 of the RMA. RPS Policy B2.4.2(4a) and Objectives B.4.1.1(1),(2) and (3) highlight the landscape, physical integrity, historic, archaeological and cultural importance of the maunga. They are relevant to the intensity of development that may occur on the slopes of the maunga. Development in accordance with clause 4(1)(b) and (c) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD would be contrary to these provisions as well as parts of Section 6, 7 and 8 of the RMA.
Identify and screen response options	A range of reasonably practicable options for achieving the objectives including alternative standards or methods have been identified (Report Section 4).
Collect information on the selected option(s)	The impact that limiting development capacity, building heights or density (as relevant) will have on the provision of development capacity has been analysed, including via reference to typical sites (Report Section 3). This has informed the identification of an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) and (c) of Schedule 3C of the RMA or Policy 3 of the NPS-UD while managing the specific characteristics.
Evaluate options – costs for housing capacity	The options have been evaluated, including consideration of the particular requirements in clause 4(1)(b) and (c) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD, as well as assessments of the efficiency and effectiveness of the provisions, focussing in the geographic areas where intensification is prioritised (Report Section 4). A preferred option has been identified.

Evaluate option(s) - environmental, social, economic, cultural benefits and costs	The evaluation has included 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. This assessment is included in Section 5 of this Report.
Selected method / approach	The preferred approach has been identified as Option 4 (the option in PC 120). The approach to implementing the qualifying matter is limited to only those modifications to the extent necessary to accommodate the qualifying matter; and how the qualifying matter is applied.
Overall judgement as to the better option (taking into account risks of acting or not acting)	The preferred approach (the option implemented as part of PC 120) acknowledges that there will be constraints on the requirements in clause 4(1)(b) and (c) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD. Those constraints are considered necessary / justified including in order to meet Part 2 RMA requirements.

2. Explanation of the Qualifying Matter

The Maunga Viewshafts and Height Sensitive Areas Overlay

9. The Auckland volcanic field covers approximately 100 square kilometres and originally contained 53 explosion craters which gave rise to the landmark scoria cones of urban Auckland. A number of these features have been lost through quarrying and development. Many of the remainder are of regional or national significance, while others are of local significance, or contribute cumulatively to the volcanic landscape and character of the region. The Maunga Viewshafts and Height Sensitive Areas Overlay (Chapter D14) includes scheduled[4] and mapped[5] locations within the region within which development is managed to protect views to and between the maunga.

10. Both the MVs and the HSAs can be located on the AUP GIS viewer by clicking on the following links: Management Layer – Overlays – Natural Heritage – Regionally Significant Maunga Viewshafts and Height Sensitive Areas Overlay (rcp/dp) and Regionally Significant Maunga Viewshafts Overlay Contours and Locally Significant Maunga Viewshafts Overlay Contours.

11. The eleven maunga (including two islands) that have MV protections are:

- Mt Eden / Maungawhau
- Mt Hobson / Ōhinerau
- Big King / Te Tātua a Riukiuta
- One Tree Hill / Maungakiekie
- Mt Wellington / Maungarei
- Mt Albert / Ōwairaka
- Mt Roskill / Puketāpapa
- Mt Victoria / Takarunga
- Māngere Mountain
- Browns Island / Motukorea
- Rangitoto

12. HSAs are located around the base of some of the cones which protect local public views to the mountains. The eleven areas that are subject to HSAs are:

- Mt Eden / Maungawhau
- Mt Hobson / Ōhinerau
- Mt Saint John / Te Kōpukea
- Big King / Te Tātua a Riukiuta

[4] See Schedule 9 and Appendix 20 of the AUP
[5] See Auckland Council Auckland Unitary Plan Operative in Part (16 Nov 2016) GEOMAPS map layers

- One Tree Hill / Maungakiekie
- Mt Wellington / Maungarei
- Mt Albert / Ōwairaka
- Mt Roskill / Puketāpapa
- Mt Victoria / Takarunga
- Māngere Mountain
- Bucklands Beach (Rangitoto viewshaft)

13. HSAs manage local views to the maunga. They also protect the shape (contours) of the flanks of the maunga. Overall, they ensure that development is of a scale and/or location that does not dominate the local landscape or reduce the visual significance or amenity values of the maunga. They also ensure that development does not encroach further up the maunga.

14. Most of the HSAs achieve the above functions, however, through the Proposed Auckland Unitary Plan (**PAUP**) Independent Hearings Panel (**IHP**) hearings, a HSA was developed at Bucklands Beach in order to give reasonable development rights under s85 of the RMA to the landowners affected by a low lying viewshaft in that area. This HSA is not close to a maunga and therefore does not perform the same functions as the other HSAs.

Background

15. The protection of the views to the maunga started over 50 years ago through a landmark decision in 1973 by the Planning Appeal Board[6] . This decision concluded that Mt Eden was of such value that views to and from the mountain should be protected. The decision considered that the council was not carrying out its duties under the Town and Country Planning Act by not protecting the visual integrity of Mt Eden.

16. As a consequence of this decision the current council and its predecessor councils imposed view protection over multiple volcanic cones throughout the region. The viewshafts have since been reviewed over time including in 1996, through Proposed Change 8 - Volcanic Features (Change 8) to the then Auckland Council Regional Policy Statement which was the culmination of almost ten years of research and work by the Auckland Regional Council and territorial authorities to jointly review and update their respective planning instruments. Further reviews were undertaken in 2001-3, 2013 and 2015 - 2016 (in the course of the AUP hearings process).

17. Over this period, the management approach to MVs remained generally consistent. Minor inconsistencies in previous district plans were resolved in the AUP. For

[6] 1973 Town and Country Planning Appeal Board decision ARA v Mt Eden Borough Council No.418/73

instance, previous district plans restricted built form to varying maximum heights of 7.3m, 9m, or 12m. This was standardised in the AUP to 9m.

18. The review at the PAUP stage in the period 2014 – 2016 was arguably the most wide-ranging cost-benefits review since the provisions were originally put in place. In response to matters raised in submissions, as well as by the then IHP, the review included an economic analysis of the MVs and HSAs, a categorisation of locally and regional significant viewshafts and a comprehensive description of each MV that was then incorporated as part of the AUP. There was also some area specific refinement of provisions, notably in the Devonport HSA.

19. A major issue raised in submissions on the PAUP was whether the MVs and HSAs remained appropriate given the greater intensification strategies introduced in the PAUP. The following is an extract from the IHP's recommendation report[7]:

> Section 2.4
>
> Having carefully considered and weighed all of landscape, economic and commercial/property evidence, including from submitters not specifically discussed above who commented on the economic costs of viewshafts (including Tram Lease et al and RSCJ Trust) the Panel draws the following general conclusions:
>
> i considering there are well in excess of 400,000 residential sites currently within the existing metropolitan area, if 2,300 sites are affected by viewshafts by not being able to be developed to their full height according to the zone provisions, that is arguably a modest total number of sites;
>
> ii. calculated another way, two million square metres of land is 200 hectares of land, and considering there are 58,000 hectares of land in the existing metropolitan area (calculated from GIS polygon), the total area of land impacted by viewshafts is also arguably modest. It represents only 0.34 per cent of the total existing metropolitan land area. The Panel does recognise that the land impacted by viewshafts is some of the more centrally located land in the region that would often otherwise be appropriate for more intensive development.
>
> The Panel also notes that notwithstanding that viewshaft E10, which crosses the CBD, has by far the largest impact on foregone floor space of 293,327m^2, there was universal agreement among the landscape and economic experts that this viewshaft should remain.
>
> Therefore, the Panel concludes that, in general terms, the significant contribution that viewshafts make to the identity of the region and the social and cultural well-being of its people, outweigh the opportunity costs of development foregone. The Panel considers that the provisions it is recommending satisfy the requirements of section 32 of the Act and promote the purpose of Part 2 of the Resource Management Act 1991.
>
> In reaching this conclusion the Panel notes that when it requested this exercise be undertaken some submitters feared that by quantifying the impact of the viewshafts it would automatically lead to their removal. Based on the findings of the detailed

[7] IHP Report to AC Topic 020 Viewshafts 22/07/2016 https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/ihp-designations-reports-recommendations/Documents/ihp020viewshafts.pdf

> examination that has been undertaken the converse position is in fact what the Panel has concluded. The economic analysis of the viewshafts has shown that the impacts in terms of development opportunities foregone are a lot less than many parties may have previously thought.
>
> Section 3.2
>
> The Panel notes that while there were substantial submissions and evidence received in regard to the merits of particular viewshafts and the extent of development controls for penetration into a viewshaft, overall submitters were very supportive of some viewshaft protection. The network of volcanic maunga are a unique and defining feature of Auckland.
>
> They are also a significant taonga for Mana Whenua and the Panel is required to provide for the relationships of Mana Whenua with their maunga.
>
> The development of Auckland has unfortunately compromised the maunga that remain by development on their fringes and, in a number of cases, maunga have been removed entirely through quarrying activity. For example, Te Tātua a Riukuita/Big King is the only remaining cone of the three that once existed.

20. While relatively thorough, the PAUP's process of reviewing MVs and HSAs did leave some gaps. The IHP recommended as follows (their recommendation ix):

> Further work is recommended in regard to the identification of Mana Whenua values for viewshafts and maunga, refinement of some existing viewshafts to improve their efficacy and reduce opportunity costs, and the identification and evaluation of potentially new regional and locally significant volcanic viewshafts.

21. PC 78 was notified in August 2022 as council's required response to the NPS-UD and requirements of the RMA (as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021). The s32 report prepared for PC 78 on MVs and HSAs assessed the MVs and HSAs as being a Qualifying Matter, including under sections 6(b), 6(e) and 6(f) of the RMA.

22. The review of MVs and HSAs from the time of the relevant AUP provisions being made operative and the introduction of PC 78 was limited to assessing, as a qualifying matter, existing provisions against the revisions that were mandated or otherwise proposed in PC 78.

23. In PC 78, the Height Sensitive Areas were proposed to be renamed Height and Building Sensitive Areas. The mapped MVs and HBSAs were to remain unchanged as were the existing height controls relating to MVs and HBSAs. New standards were proposed in HBSAs in relation to building coverage, landscaped area, yards and earthworks.

24. There were 73 submitters to the MV / HBSA as part of PC 78, raising a total of 100 submission points. Matters raised in submissions included:

- 41 submissions were in support;
- 9 submissions opposed MVs. Of these, 5 related to specific sites and a further 2 related to specific areas.

- 5 submissions opposed HBSAs. All but one submission related to specific sites or areas. The only submitter opposing HBSAs in general was Kāinga Ora, who sought an overall comprehensive review to consider where additional height on a site-by-site basis could be applied up to the zoning height on sites not zoned open space while still maintaining important local views of the maunga from local public places.
- 14 submissions opposed the additional HBSA standards. Most of these submissions related to all of the proposed new standards.
- 6 submissions sought clarification of the provisions.
- 11 submissions sought further protections or amendments to the provisions. This included a submission from the Tūpuna Maunga Authority seeking that investigations be carried out in respect of maunga to maunga views and submissions seeking an extended time to allow temporary construction and safety activities (specifically, cranes) to infringe a viewshaft. Other amendments sought ranged from requests for further viewshafts to further or extended controls and criteria.

25. Submissions relating the City Centre Zone and Metropolitan Centre Zone have been heard. A decision was released in respect of the City Centre Zone on 29 May 2025. At the date of the notification of Proposed Plan Change 120, the decision in respect of the Metropolitan Centre Zone has not been released. As a result of the City Centre Zone decisions of the council (which accepted all of the IHP recommendations), the viewshafts are now referred to in the AUP as “Maunga Viewshafts”. There is also a new standard in Chapter D14, limited to the City Centre Zone and the Metropolitan Centre Zone, allowing temporary construction and safety structures up to 24 months. The D19 Museum Viewshaft provisions have been amended with a new special information requirement requiring a landscape assessment of views between Takarunga / Mount Victoria and Maungawhau / Mount Eden in any non-complying activity application.

26. As a result of these long-standing policies and provisions the pattern of development has been largely low-density development across the flanks and bases of most maunga and a discernible limitation on the height of buildings where a MV applies.

Maunga Viewshafts and Height and Building Sensitive Areas as a Qualifying Matter

27. There are multiple reasons for the MVs and HSAs to be identified as a qualifying matter under clause 8 of Schedule 3C of the RMA, including:

    - matters of national importance (s6(b), s6(e) and s6(f) that decision makers are required to recognise and provide for under section 6.

    (Clause 8(1)(a) of Schedule 3C and sections 77I(a) of the RMA)

    - a matter necessary to implement, or to ensure consistency with, iwi participation legislation.

    (Clause 8(1)(a) of Schedule 3C and sections 77I(h) of the RMA)

28. A detailed analysis of MVs and HSAs as a qualifying matter (**QM**) is given in Part 2 Issues of this report.

3. Issues

Policy 3 of the NPS-UD and Clause 4(1) of Schedule 3C of the RMA

29. The NPS-UD sets out Objectives and Policies aimed at achieving well-functioning urban environments across New Zealand that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.[8] It also requires that planning decisions improve housing affordability by supporting competitive land and development markets.[9]

30. To achieve this, district plans must enable more people to live in, and more businesses and community services to be located in, specific areas of an urban environment that the authors of the legislation think will achieve the outcomes of the objectives.

31. Policy 3 of the NPS-UD specifically requires building height of at least 6 storeys in walkable catchments and metropolitan zones. The height and density of urban form in city centre zones and other centre zones is not specified. It is noted that the City Centre Zone and Metropolitan Centre Zone have been addressed as part of the PC 78 process.

32. Clause 4(1) of Schedule 3C of the RMA requires that Auckland Council must amend the AUP to—

    (a) provide at least the same amount of housing capacity that Plan Change 78 (as notified) would have provided if made operative; and

    (b) enable, within at least a walkable catchment of the Maungawhau (Mount Eden), Kingsland, and Morningside Stations,—
    (i) heights and densities commensurate with the greater of—
    (A) demand for housing and business use in those locations; or
    (B) the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations; and
    (ii) in all cases, building heights of at least 15 storeys in those locations; and

    (c) enable, within at least a walkable catchment of the Baldwin Avenue and Mount Albert Stations,—

[8] NPS-UD, Objective 1, Policies 1
[9] NPS-UD, Objective 2

(i) heights and densities commensurate with the greater of—
(A) demand for housing and business use in those locations; or
(B) the amount of housing and business use that is appropriate given the level of accessibility to commercial activity and community services in those locations; and
(ii) in all cases, building heights of at least 10 storeys in those locations; and

(c) give effect to Policy 3.

33. Council has used the following heights in metres to relate to the specified storeys in Policy 3 of the NPS-UD and Clause 4(1) of Schedule 3C of the RMA (**Clause 4(1)**).

Height conversions

Storeys*	Height floor to floor(m)	Max height (m)	Max Height Rounded (m)
1	4		
6	3.1	22	22
10	3.1	34.4	34.5
15	3.1	49.9	50

*It is assumed that the first storey is 4m, thereafter each storey is 3.1m.

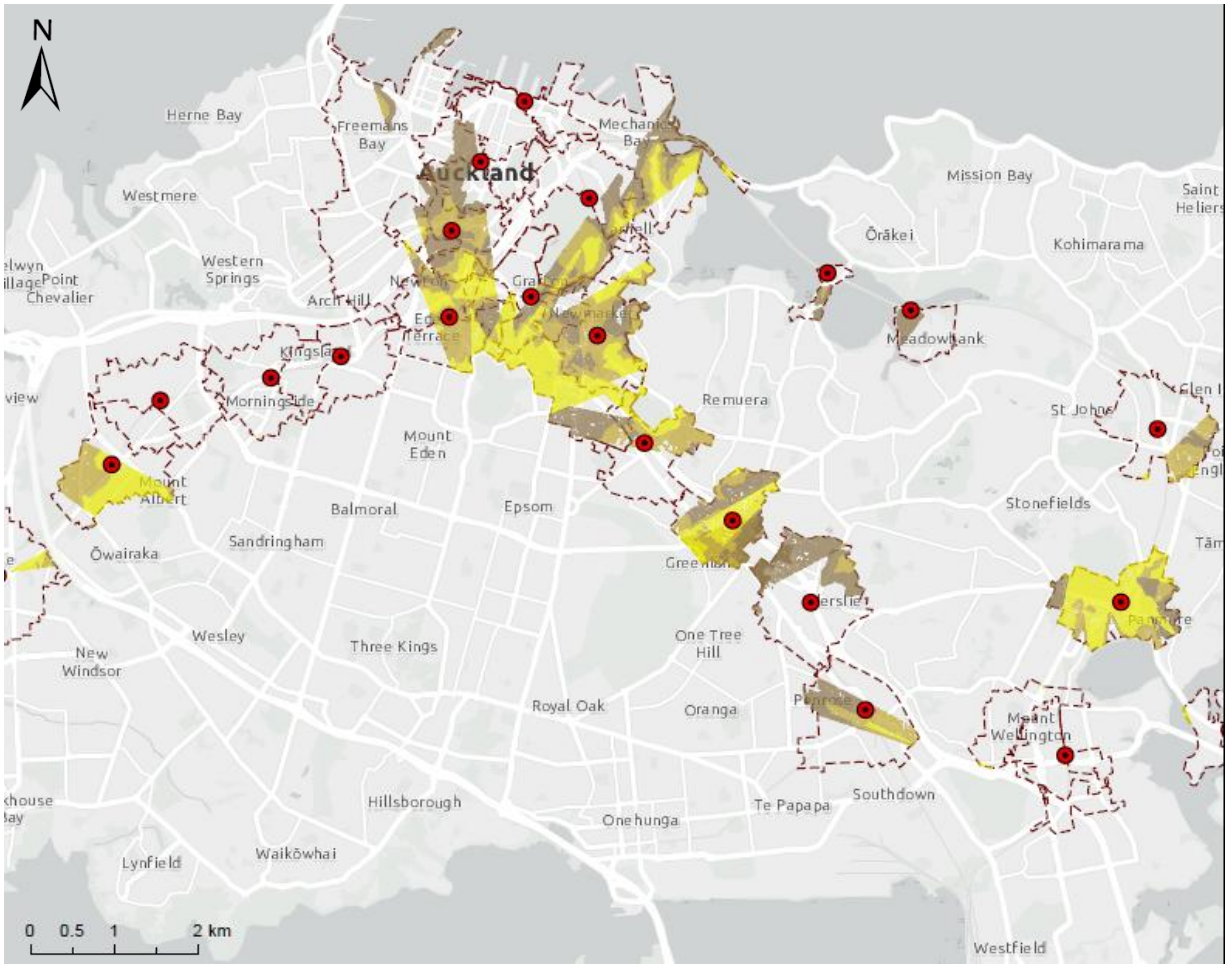
Source: Proposed Plan Change 120 – Residential and Business Intensification Continued – Section 32 Evaluation

34. The "specified heights" are accordingly:

1. 15 storeys (50m) within at least a walkable catchment of the Maungawhau (Mount Eden), Kingsland, and Morningside Stations;
2. 10 storeys (34.5m) within at least a walkable catchment of the Baldwin Avenue and Mount Albert Stations;
3. at least 6 storeys (22m) in (other) walkable catchments and metropolitan zones.

35. Map 1 below indicates where MVs restrict development to less than these heights[10]. It is noted that the height restrictions are not uniform due to the varying height of the MV and the varying ground levels. However, the height restriction for any given site, or part of a site, can be obtained by viewing the AUP Viewshaft Contours layer. That enables a detailed comparison with the specified heights on any given site or area.

[10] Maps have been supplied by Council's Geospatial team in the Auckland-wide Planning Unit. **Appendix F** includes these maps (and others) at a larger scale for ease of viewing and interpretation.



LEGEND

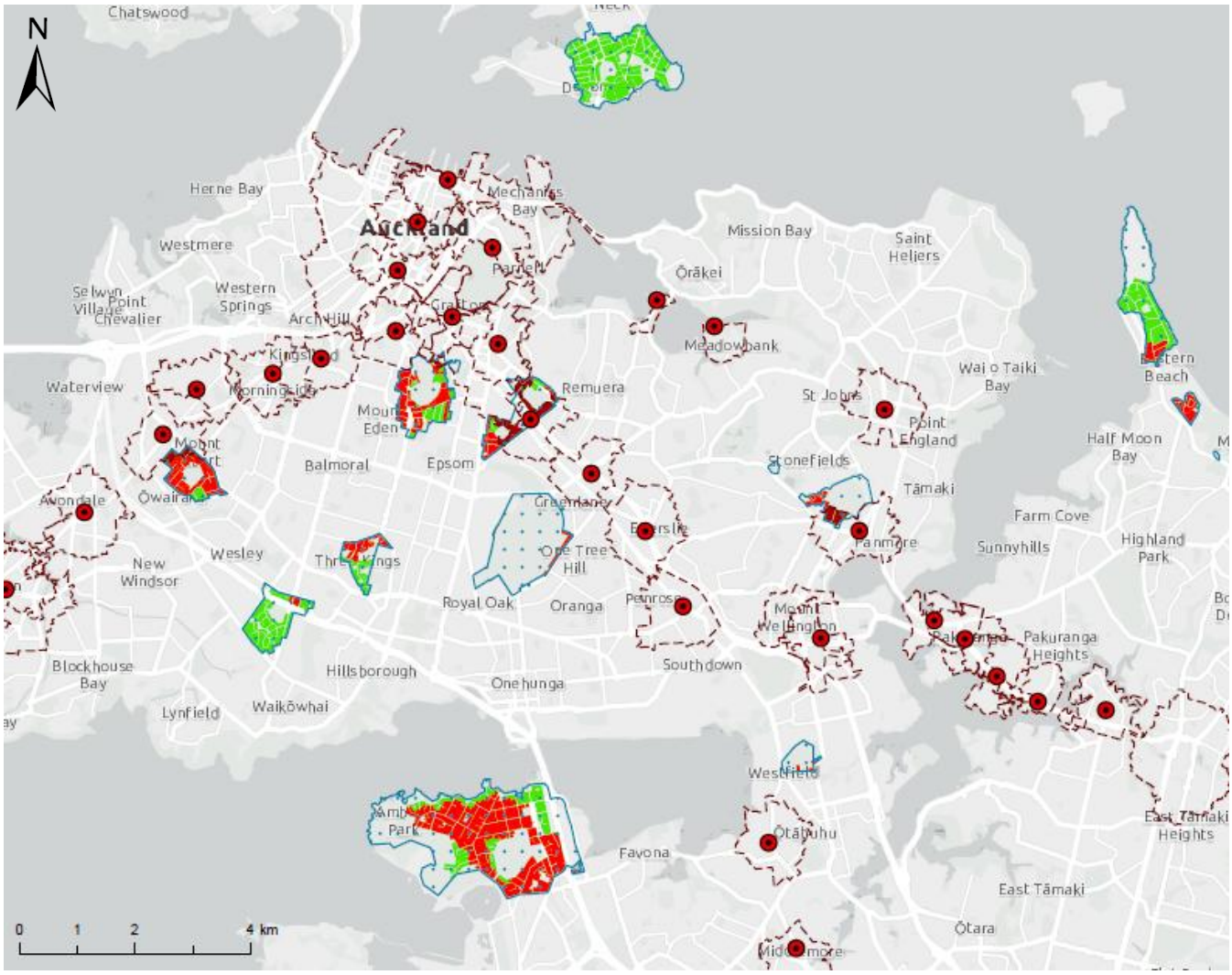
- Rapid Transport Network stops
- Indicative Walkable Catchment

Viewshaft heights

- 22m and under
- 34.5m and under
- 50m and under

Map 1 Maunga Viewshafts vs Specified Heights

36. Map 2 below indicates the location of HBSAs, where the proposed PC 120 zoning has height provisions that would allow development higher than would be permitted in a HBSA and existing or downzoned areas where the zonings allow development higher than would be permitted in a HBSA.

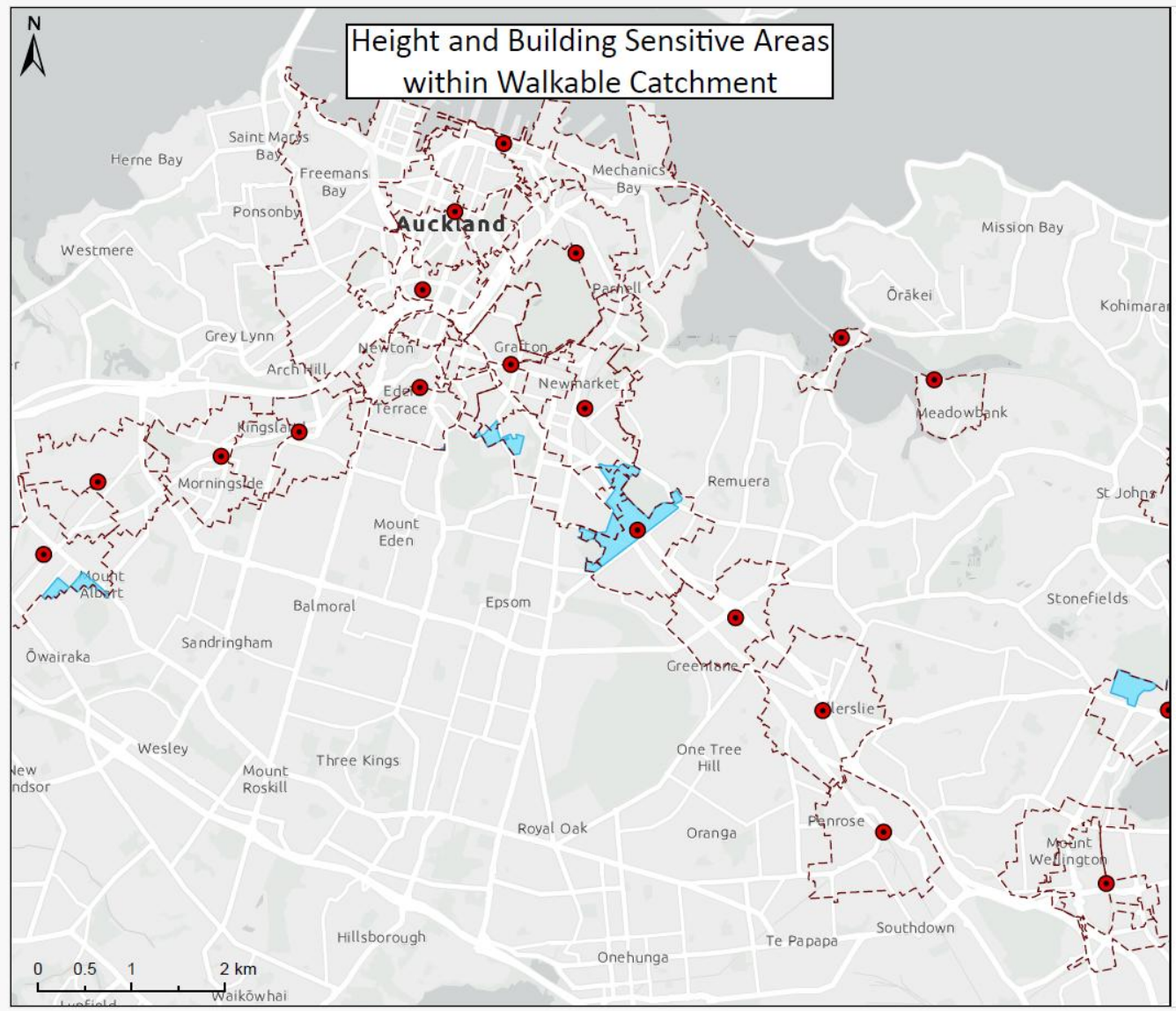


LEGEND

- Rapid Transport Network stops
- Height Sensitive Areas
- Indicative Walkable Catchment
- Proposed RPC zoning above height sensitive area
- Proposed RPC zoning above height sensitive area within a walkable catchment
- Existing UP zoning or downzoned areas above height sensitive area

Map 2 Height and Building Sensitive Areas vs Zone Heights

37. Map 3 extracts the information for walkable catchments in HBSAs only, noting that the permitted height in a HBSA is 9m, as opposed to the 22m height relevant to Policy 3 of the NPS-UD.



LEGEND

- Rapid Transport Network stops
- Indicative Walkable Catchment
- Height Sensitive Areas within Walkable Catchments

Map 3 Walkable Catchments within Height and Building Sensitive Areas

38. There are approximately 26,700 properties under the viewshafts and Height Sensitive Areas in the region - approximately 7.2% of all residential sites. However not all of these sites will be limited by the heights enabled under the viewshafts and within HSAs. In the case of MVs, the height of the viewshaft is often above the height of building that would otherwise be possible under the standard zone provisions. The above maps (Maps 1 to 3) illustrate the areas where MVs and / or HBSAs constrain the achievement of specified heights. It is noted that some of these areas are also subject to other QMs, notably the Special Character Area QM.

39. **Table 2** presents a breakdown of the areas (in hectares) impacted by MVs—both regional and local—and HBSAs, across various residential and business zones (region-wide), including the Special Purpose – Māori Purpose Zone, as proposed under PC 120. The total area affected by these overlays is 3236.6ha, noting that this total recognises that there are areas where MVs and HBSAs overlap.

40. **Table 3** shows how MVs and HBSAs affect different zones (in hectares) within the walkable catchments of Maungawhau / Mt Eden and Mt Albert, which are specified for intensification under clause 4(1)(b) and (c) in Schedule 3C of the RMA, and across all areas (walkable catchments and around centres) identified for intensification under Policy 3 of the NPS-UD.

41. It is understood that the information provided in **Tables 2** and **3** below has been used to inform the broader capacity assessments.

Table 2: Overview of the gross areas (according to the underlying zone as proposed under PC 120) affected by MVs and HBSA across the region. (Note there are other zones affected e.g. Special Purpose – Major Recreation Facility and Open Space zones, but for the purposes of this exercise have been excluded). [11]

Overlay Reference	Zone Reference	Area (in hectares)
Local Maunga Viewshafts Overlay	Business - Light Industry Zone	37.34
	Business - Mixed Use Zone	17.98
	Residential - Mixed Housing Urban Zone	74.38
	Residential - Single House Zone	35.83
	Residential - Terrace Housing and Apartment Building Zone	86.06
Height Sensitive Areas Overlay	Business - Neighbourhood Centre Zone	1.69
	Special Purpose - Healthcare Facility and Hospital Zone	2.92
	Open Space - Community Zone	3.19
	Business - Local Centre Zone	3.52
	Special Purpose - Māori Purpose Zone	3.75

[11] This data has been supplied by the council's Geospatial team in the Auckland-wide Planning unit and is based on the PC 120 maps as of 8 September 2025.

	Business - Town Centre Zone	4.42
	Business - General Business Zone	5.68
	Special Purpose - School Zone	8.85
	Business - Mixed Use Zone	17.09
	Business - Light Industry Zone	29.62
	Open Space - Sport and Active Recreation Zone	68.12
	Residential - Mixed Housing Suburban Zone	83.51
	Residential - Single House Zone	178.52
	Open Space - Conservation Zone	217.41
	Open Space - Informal Recreation Zone	277.91
	Residential - Mixed Housing Urban Zone	316.85
Regional Maunga Viewshafts Overlay	Special Purpose - Healthcare Facility and Hospital Zone	1.62
	Business - Local Centre Zone	3.26
	Open Space - Community Zone	5.56
	Special Purpose - Tertiary Education Zone	6.93
	Special Purpose - Major Recreation Facility Zone	7.71
	Business - Neighbourhood Centre Zone	8
	Business - Business Park Zone	8.44
	Special Purpose - Cemetery Zone	12.26
	Business - General Business Zone	13.83
	Business - Heavy Industry Zone	25.31
	Special Purpose - School Zone	48.67
	Residential - Mixed Housing Suburban Zone	53.41
	Business - Town Centre Zone	61.55
	Open Space - Conservation Zone	80.68
	Business - Light Industry Zone	109.14
	Open Space - Sport and Active Recreation Zone	159.16
	Business - Mixed Use Zone	200.41

	Open Space - Informal Recreation Zone	212.93
	Residential - Single House Zone	294.81
	Residential - Terrace Housing and Apartment Building Zone	774.49
	Residential - Mixed Housing Urban Zone	1038.69

Table 3: Overview of the gross areas (according to the underlying zone as proposed under PC 120) affected by MVs and HBSA in the walkable catchments mandated for intensification under Clause 4(1)(b) and (c) in Schedule 3C of the RMA and Policy 3 of the NPS-UD. (Note there are other zones affected e.g. Special Purpose – School and Open Space zones, but for the purposes of this exercise have been excluded. There may also be a double count of data given that the mandated intensification areas are also in indicative walkable catchments / Policy 3 areas).[12]

Overview of the gross areas affected by MVs and / or HBSAs in walkable catchments mandated for intensification under Clause 4(1)(b) and (c) in Schedule 3C of the RMA			
Walkable Catchment Name	**Qualifying Matter**	**Proposed PC 120 Zone**	**Area (in hectares)**
Maungawhau / Mt Eden Train Station	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Residential - Terrace Housing and Apartment Building Zone	8.83
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Business - Mixed Use Zone	54.43
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Business - Town Centre Zone	4.97
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Residential - Single House Zone	2.33
		TOTAL AREA	70.56
Mt Albert Train Station	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Residential - Terrace Housing and Apartment Building Zone	29.57
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Business - Mixed Use Zone	4.19
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Residential - Mixed Housing Urban Zone	4.79
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Residential - Single House Zone	4.9
	Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Business - Town Centre Zone	1.51
		TOTAL AREA	44.96
Overview of the gross areas affected by MVs and / or HBSAs in all walkable catchments			
Local Maunga Viewshafts Overlay	Business - Light Industry Zone		2.09
	Business - Mixed Use Zone		12.7
	Residential - Terrace Housing and Apartment Building Zone		49.47
		TOTAL AREA	64.26
Regional Maunga Viewshafts and Height and Building	Business - Business Park Zone		7.91
	Business - General Business Zone		10.27
	Business - Heavy Industry Zone		11.92
	Business - Light Industry Zone		21.26
	Business - Mixed Use Zone		174.42

[12] This data has been supplied by the council's Geospatial team in the Auckland-wide Planning unit and is based on the PC 120 maps as of 8 September 2025.

Sensitive Areas Overlay	Business - Town Centre Zone	33.18
	Residential - Mixed Housing Suburban Zone	4.87
	Residential - Mixed Housing Urban Zone	26.47
	Residential - Single House Zone	46.55
	Residential - Terrace Housing and Apartment Building Zone	284.29
	TOTAL AREA	621.14
Overview of the gross areas affected by MVs and / or HBSAs in indicative Policy 3(d) extents		
Local Maunga Viewshafts Overlay	Business - Mixed Use Zone	1.34
	Residential - Terrace Housing and Apartment Building Zone	2.96
	TOTAL AREA	4.3
Regional Maunga Viewshafts and Height and Building Sensitive Areas Overlay	Business - Heavy Industry Zone	2.89
	Business - Light Industry Zone	7.39
	Business - Local Centre Zone	1.59
	Business - Mixed Use Zone	11.68
	Business - Neighbourhood Centre Zone	1.2
	Business - Town Centre Zone	32.34
	Residential - Mixed Housing Urban Zone	7.39
	Residential - Single House Zone	32.95
	Residential - Terrace Housing and Apartment Building Zone	147.77
	TOTAL AREA	245.2

42. The amendments proposed to HBSAs introduce building coverage, landscaped area and earthworks controls. This is estimated to affect a total of 8,380 properties, of which 1,332 (or 15.9% of all sites within an HBSA) are within a Policy 3 area or frequent transit network (**FTN**) corridor.[13] These new controls will subsequently limit the possible development and housing capacity across all 8,380 properties than what would otherwise be possible if these amendments were not introduced and the underlying zoning was relied on. The effects on capacity with respect to QMs, such as, MVs and HBSAs, are assessed in more detail as part of the PC 120 s32 – Economy Matters Report.

43. **Table 4** below provides a comparison between the coverages enabled under the different urban residential zones compared to those provided under the HBSA to illustrate the possible limitations on capacity posed by the differences and address clause 8(2)(b) of the RMA. Ultimately, a reduced building coverage broadly restricts the possible density of development enabled by limiting the area available for buildings. The potential restrictions of the HBSA on building coverage (and therefore possible development capacity and densities) will be most evident in scenarios where the underlying zone is Residential – Mixed Housing Urban, and Residential – Terrace Housing and Apartment Buildings (with and without a height variation control applied).

[13] This data has been supplied by the council's Geospatial team in the Auckland-wide Planning unit and is based on the PC 120 maps as of 29 August 2025.

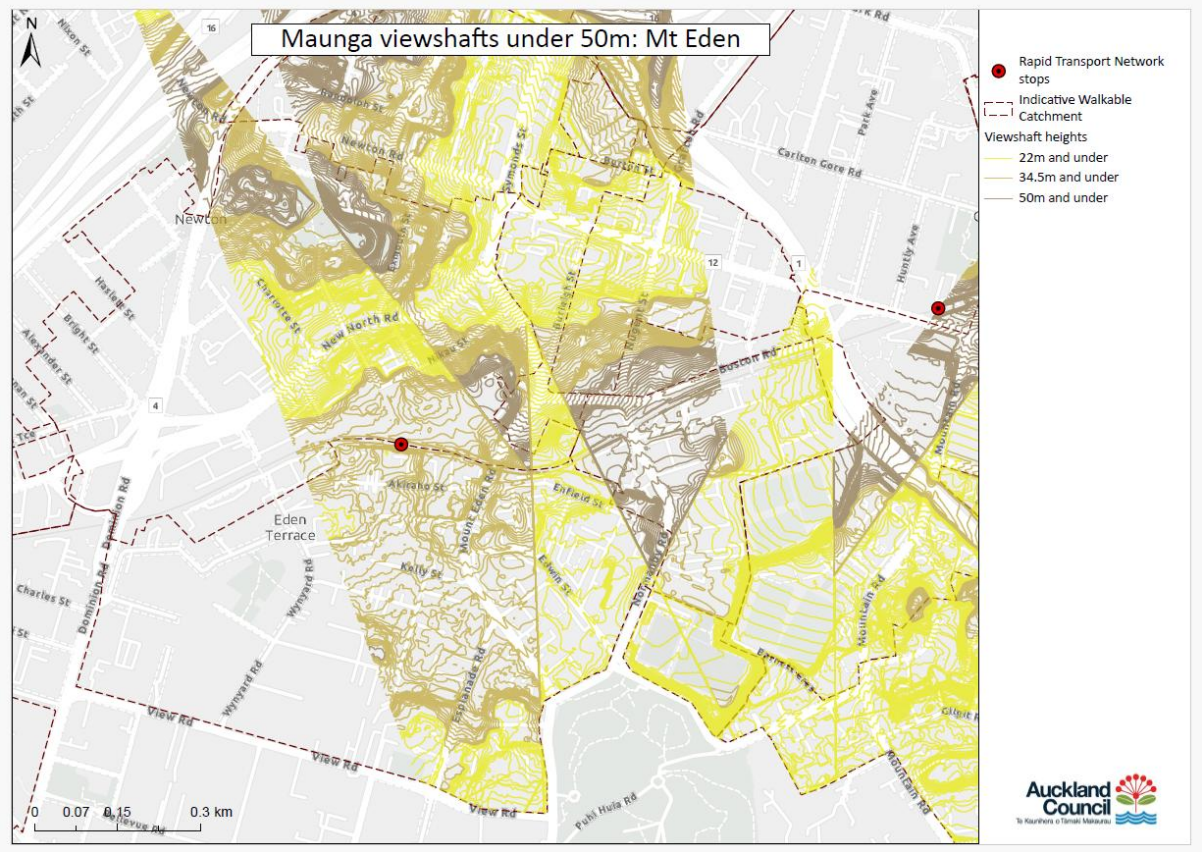
Table 4: Comparison of coverage, and building height standards across the Residential – Terrace Housing and Apartment Buildings, Mixed Housing Urban, Mixed Housing Suburban, Single House Zones and the HBSA to, at a high level, describe the potential limitations on development capacity and possible densities								
Standard	**Terrace Housing and Apartment Buildings Zone (THAB) – inside a walkable catchment and subject to a 15 storey HVC**	**Terrace Housing and Apartment Buildings Zone (THAB) – inside a walkable catchment and subject to a 10 storey HVC**	**Terrace Housing and Apartment Buildings Zone (THAB) – inside a walkable catchment up to 6 storeys (but not subject to an HVC)**	**Terrace Housing and Apartment Buildings Zone (THAB) – outside of a walkable catchment**	**Mixed Housing Urban Zone (MHU)**	**Mixed Housing Suburban Zone (MHS)**	**Single House Zone (SHZ)**	**Height and Building Sensitive Area (HBSA)**
Maximum building height	50m	34.5m	22m	22m	12m (11m + 1m for roof form	9m (8m + 1m for roof form	9m (8m + 1m for roof form)	9m
Maximum building coverage	50%	50%	50%	50%	45%	40%	35%	35%
Minimum landscaped area	30%	30%	30%	30%	35%	40%	40%	40%
Note: Based on the information in this table it becomes clear that the proposed HBSA standards align more closely with those same standards in the SHZ and MHS zone.								

44. In respect of Clause 4(1)(b) and (c) the Kingsland, Morningside and Baldwin Avenue Station walkable catchments are not affected by MVs or HBSAs. The Maungawhau (Mount Eden) Station walkable catchment is not affected by a HBSA. It is affected by MVs E10, E16, E18, E19 and E20. The Mount Albert Station walkable catchment is affected by a HBSA and MVs A1, A10 and A13.

45. In respect of Policy 3, Maps 1 and 3 above indicate the other walkable catchments affected. They are at Avondale, Newton, Freemans Bay, Newmarket, Grafton, Parnell, Mechanics Bay, Remuera, Greenlane, Ellerslie, Point England, Panmure, Penrose and a small portion of sites in Sylvia Park/Mt Wellington.

46. Maungawhau (Mount Eden) and Ōwairaka (Mount Albert) are key locations and are also good examples of where and how the MVs and HBSAs apply generally across Auckland.

47. The map below identifies the area of the Maungawhau (Mount Eden) Station walkable catchment that is affected by MVs.



Map 4 Maunga Viewshaft Heights – Maungawhau (Mount Eden)

48. There are a wide range of sites affected by MVs and HBSAs. To illustrate how MVs and HBSAs may affect potential building heights and development capacity, a few representative sites (detailed below) have been selected and used as case study examples to speak to and contextualise the possible and different impacts of this QM on development and housing capacity and discuss the resource management issues. These examples use publicly available information from Auckland Council's GIS viewer and are intended to resolve the assessments required under clause 8(2)(b) and 8(5)(d) of the RMA for what the impacts of MVs and HBSAs would be on a representative site.

49. There is considered to be no 'typical site' that can be used to universally speak to the impacts of this qualifying matter - particularly when assessing MVs—because available building heights vary significantly depending on the separation between the natural ground level and the viewshaft. For instance, sites located closer to the maunga generally have less vertical space between the underlying topography (natural ground level) and the viewshaft, resulting in lower allowable heights. Conversely, sites farther from the maunga tend to offer greater height potential, unless they are situated on elevated terrain, such as, ridgelines.

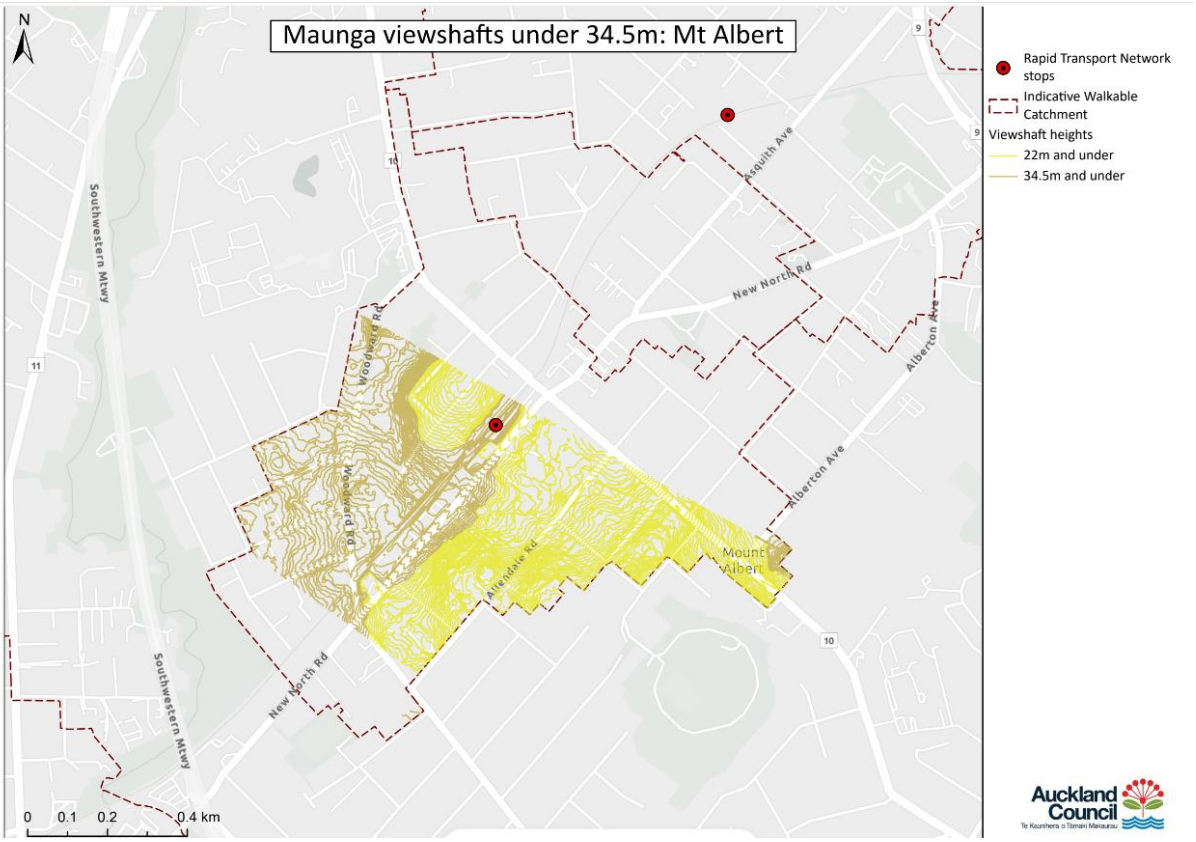
50. The sites examined below are therefore representative of potential effects, but it is acknowledged that there could be further variations that illustrate the possible impacts on heights and development capacity from the MV and HBSA qualifying matters.

51. The site at 7 View Road, Mount Eden is in an operative Residential Mixed Housing Urban Zone with an underlying permitted height of 12m. MVs E6, E10, E16 and E20 lie above the site at a height of 14m – 15m. Therefore, the most constricting height factor on the site is the viewshafts. PC 120 proposes to zone this site Residential – Terraced Housing and Apartment Building Zone with a permitted height of 22m. The MVs will still be the most constricting height control over development of the site, but now with a greater height differential between the MV height and the new zoning height.

52. The site at 7 Hillside Crescent South, Mount Eden is in an operative Residential Single House Zone with an underlying permitted height of 9m. MVs E6, E8, E9, E10, E11, E12, E16, E18, E19 and E20 lie above the site at a height of 19m – 25m. The site is also in a HSA where a 9m height applies.

53. Therefore, the zoning and the HSA control height to the same height. PC 120 proposes to zone this site Residential – Mixed Housing Urban with a permitted height of 12m. The HBSA will become the sole most constricting height control over development of the site – limiting building height to a maximum of Proposed new coverage, landscape and earthworks standards will apply to this site and will limit development to less than that possible under the zoning. As a steep site the new earthworks standard may require a resource consent that may not otherwise have been required and / or new assessment criteria will apply.

54. The map below identifies the area of the Mount Albert Station walkable catchment that is affected by MVs and HBSA.



Map 5 Maunga Viewshaft and Height and Building Sensitive Area Heights – Mount Albert

55. The site at 36 Allendale Road, Mount Albert is in an operative Single House Zone with an underlying permitted height of 9m. MV A13 lies above the site at a height of 4m – 11m. Therefore the most constricting height factors on the site are a mixture of the MV and the zoning. PC 120 proposes to zone this site Residential – Mixed Housing Urban Zone with a permitted height of 12m. The MV will be the most constricting height control over development of the site.

56. The site at 34 Woodward Road, Mount Albert is in an operative Residential Mixed Housing Urban Zone with an underlying permitted height of 12m. MV A13 lies above the site at a height of 29m – 31m. PC 120 proposes to up-zone this site to Residential – Terraced Housing and Apartment Buildings and introduce a height variation control with a permitted height of 34.5m. The height enabled under the MV will now be the most constricting height control over development of the site enabling heights between 29m to 31m.

57. The site at 4 Stilwell Rd, Mt Albert is currently zoned Residential Single House Zone. It has the Special Character Overlay (**SCAR**) over the site. The underlying zone height is 9m and the SCAR height is 9m. MV A13 crosses over the site at a height of 10-11m. Therefore, the zone height is the most constricting height. Under PC 120 the site is inside a walkable catchment, however the site will remain zoned Residential Single House Zone with a SCAR overlay. The underlying zone and SCAR height of 9m will remain the most constricting height control over development of the site.

58. The site at 17 Summit Drive, Mt Albert is in an operative Residential Single House Zone with an underlying permitted height of 9m. MV A1 and A13 crosses over the site at a height of -10m to -19m. The site is also in a HSA where a 9m height applies. The zoning and the HSA control height to the same height but it is the MV that is the most limiting height control. PC 120 proposes to zone this site Residential – Mixed Housing Urban with a permitted height of 12m. Notwithstanding the location in a HBSA, the MV will remain the most constricting height control over development of the site, however to a 9m height, consent will only be required (as a Restricted Discretionary Activity) under the MV provisions. The HBSA will become the sole most constricting height control over development of the site. Proposed new coverage, landscape and earthworks standards in the HBSA will apply to this site and will limit development to less than that possible under the zoning. Please refer to Table 2 in this report for an example of how the possible building coverage would be limited when comparing the HBSA to the MHU zone. The new earthworks standard may trigger the need for a resource consent that may not otherwise have been required and / or new assessment criteria will apply.

59. In summary, dwelling capacity / storey heights is reduced in some areas covered by MVs and HBSAs to the extent that full effect cannot be given to Policy 3 of the NPS-UD or Clause 4(1)(b) and (c) of Schedule 3C of the RMA. Further limitations are introduced via the addition of new coverage and earthworks standards in the HBSAs, which will limit possible densities, development and housing capacity.

Importance of Maunga Viewshafts and Height and Building Sensitive Areas

60. Auckland Council may modify the requirements of clause 4(1)(b) and (c) and Policy 3 to be less enabling of development than provided in that clause or policy only to the extent necessary to accommodate 1 or more of the qualifying matters that are present as set out in clause 8(1) (a) and (b) of schedule 3C. Relevant to MVs and HBSAs, these matters include:

    (a) a matter of national importance that decision makers are required to recognise and provide for under section 6:
    (h) a matter necessary to implement, or to ensure consistency with, iwi participation legislation

61. Section 6(b) of the RMA provides that council shall recognise and provide for:

    (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:

62. All of the maunga have an Outstanding Natural Feature Status in the AUP. All meet the following AUP criteria for that status[14]:

[14] AUP Policy B4.4.2(1) and AUP Schedule 6

(a) natural science factors: geology, topography, hydrology, vegetation cover, ecology and natural processes;
(c) aesthetic values and memorability: including landmarks and significant views;
(d) perceptions of naturalness: related to human influences, the presence of buildings and structures or landform modification;
(e) transient landscape values: including those related to natural processes, such as seasonal change and the presence of wildlife;
(f) shared and recognised values: including the public profile and recognition of particular landscapes;
(g) Mana Whenua: the value of the landscape to Mana Whenua;
(h) historical: the landscape's known historical associations.

63. Most of these criteria contain components that relate to views of the maunga. The criteria also refer more generally to landscape matters. Specific reference is made to the value of the landscape to Mana Whenua and also to the landscape's known historical associations.

64. The MVs and HBSAs extend outside the physical extent of the ONFs. They represent intrinsic associative values which are clearly indicated in the ONF criteria. The MVs and the HBSAs as being intrinsically linked to the need to recognise and provide for the protection of the ONFs.

65. The values represented by and protected by the current MVs and HSAs and have been for the past 50 years. The balance between development enabled and values protected has been largely accepted by the community, with some exceptions, including the identification of maunga to maunga views and the possible introduction of protection of other maunga views. Those exceptions are acknowledged, however, they have not been able to be pursued within the time constraints of this current plan change and are outside the Plan Change's scope.

66. Policy 3 of the NPS-UD and Clause 4(1)(b) and (c) of Schedule 3C of the RMA mandate greater heights for buildings. In respect of both MVs and HBSAs the changes to allow additional height within the urban environment of Auckland places a renewed focus on the losses described above. In summary:

- Built form of a height of 6 stories or higher (much higher in the areas specified in Clause 4(1)(b) and (c)which breaches a MV will block that protected view.

- Built form of a height of 6 stories or higher (much higher in the areas specified in Clause 4(1)(b) and (c)) within a HBSA may block local views to the maunga.

67. Full implementation of Policy 3 of the NPS-UD and Clause 4(1)(b) and (c) of Schedule 3C of the RMA would result in the potential for erosion of the ONF values protected by the MVs and HBSAs. This could generate the following adverse effects:

- Loss of visual character of the maunga and the HBSAs

- Loss of visual integrity of the maunga
- Loss of form of the maunga (profile and cone shape)
- Loss of regional views to and between maunga (sense of place and identity)
- Loss of local views to maunga
- Loss of local character and identity
- Loss of cultural values
- Loss of landscape values
- Loss of Historic Heritage values
- Loss of the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga
- Loss of intrinsic values associated with the maunga as ancestor

68. Without adequate management of these adverse effects the values represented by the ONFs will not be protected.

69. The current HSAs protect local views to the maunga so that they are connected to their local communities. The traditional pattern of largely Single House development found across the flanks and bases of most maunga includes a low, relatively homogeneous, relief / skyline which is maintained by the HSA's existing 9m height standard. At a local level that standard manages the adverse effects listed above that are relevant to MVs.

70. Policy 3 of the NPS-UD and Clause 4(1)(b) and (c) of Schedule 3C of the RMA will also allow greater density in some HSAs. The up-zoning proposed in PC 120 raises similar issues in HSAs to those that were assessed for PC 78. In a report prepared for that plan change, prepared by landscape architect Mr. Stephen Brown (see **Appendix A**[15]), Mr. Brown raised concerns about increased bulk and density being built in the HSAs. The resulting potential for intensification and the conglomeration of built forms could result in:

- Built form which increases building coverage and the blocking of local views to the maunga and the natural profile and slope of landforms around dwellings;

- Built form which reduces landscaped areas and retention of trees and other mature vegetation that help to reinforce the landform of the maunga;

- Encroachment of built form into existing yard setbacks, reducing gaps between buildings which may block local views to the maunga;

- Additional potential for earthworks to support higher density built form e.g. foundation construction, the creation of flat building platforms etc, which may affect cultural and landscape values.

[15] Landscape Report on the National Policy Statement on Urban Development & the Housing Enabling Act

71. Many of these issues were central to two Environment Court decisions addressing the maunga and their protection. The first of these related to SH20 and its passage close to Puketapapa / Mt Roskill, referencing the *Other Lands Disposal and Public Bodies Empowering Act 1915.* In the Environment Court's decision addressing the potential effects of the proposed highway on the Maunga, it was noted that this legislation continues to place strict control over the excavation or terracing of land abutting public reserves on the volcanic cones (page 49). The 1915 act was largely triggered by public concern about the removal of the crest of Ōwairaka / Mt Albert for railway ballast, but it was also on the rise over the (then) quarrying of Maungawhau / Mt Eden, Maungarei / Mt Wellington, Puketapapa / Mt Roskill and other volcanic features.

72. In addition, the Environment Court's decision in *Tram Lease Ltd v Auckland Council (No. [2015] NZEnvC 133)* also addresses the issue of Mt Albert and its mixed patina of housing, vegetation and open space, albeit in a more general fashion. In that decision, the Court stated:

> *[90.] We are not convinced by any arguments that the vegetation or the existing buildings on the natural feature, or the view shaft itself, have no value. We conclude that it is the tension between the built environment on the lower shoulders of Mt Albert and the dominant (perhaps tonsured) features of the cone with the patches of colour through it which make the view so striking. ……..."*

73. The 'breathing space' and visual permeability between and around buildings in HSAs, which has until now been maintained largely by the generally low density zonings in these areas, expresses and articulates the underlying maunga landforms. The potential under the 45% building coverage standard in the Residential Mixed Housing Urban Zone that applies to large areas of HBSAs under PC 120 is for the intensification and the conglomeration of built forms into large and/or uneven blocks or 'clusters'. This would have the effect of suppressing and eroding the volcanic landforms in the HBSAs, increasing the visual dominance of man-made structures at the expense of the maunga. Without additional or alternative management an increasingly hard 'wall' would start to emerge between the maunga reserves / tihi and the residential areas that enclose them. The sense of transition between both areas – underpinned by glimpses of the maunga landform and its shaping of development down each maunga's slopes – would be eroded and, in some locations, could be largely lost.

74. A significantly increased level of earthworks across the maunga would also further erode their physical integrity, both on a site by site basis and in aggregate. As examples the currently applying earthworks limit of 250m^3 could provide for:

- a new building platform for a house with a footprint of 150m2 to an average depth of 1.7m;
- a double garage 5.8m wide and 5m deep with a cut that is just over 8m deep on average;
- a driveway 15m long and 3m wide with earthworks at an average depth of 5.5m; and

- an outdoor terrace that is 10m long and 5m wide averaging 5m in depth, possibly with retaining on one side much taller than that.

75. In summary, higher densities of development could adversely affect:

- The residual open space between houses and other structures – in places merging with the reserves that cap each cone;
- The natural profile and slope of landforms around dwellings; and
- The retention of trees and other mature vegetation that help to reinforce this flow of landforms through residential environs.

76. Section 6 of the RMA provides that council shall recognise and provide for:

(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:

(f) the protection of historic heritage from inappropriate subdivision, use, and development:

77. The relationship between Māori and the Tūpuna Maunga was described in the Waitangi Tribunal Tāmaki Makaurau Settlement Process Report as follows[16]:

> *…maunga are iconic landscape features for Māori. They are iconic not because of their scenic attributes, but because they represent an enduring symbolic connection between tangata whenua groups and distinctive land forms. Sometimes, these land forms are the physical embodiment of tūpuna. Thus, associations with maunga are imbued with mana and wairua that occupy the spiritual as well as the terrestrial realm. Maunga express a group's mana and identity. This connection and expression is an integral part of Māori culture.*

78. Appendix B shows the input that has been requested and provided by the Tūpuna Maunga Authority.[17] There has been limited time for consultation with mana whenua, however, building on previous consultation, there have been hui held with mana whenua as recorded in the Māori Engagement Consultation Summary Report.

79. In respect of the cultural importance of the maunga the Tūpuna Maunga Authority states:

> *Maunga are intrinsically connected to Māori identity and well-being. They are a known landmark for mana whenua for whom their names are immediately recognisable as symbols of their people. It is for this reason maunga are referred to in pepeha (introductions) being part of the story of the places and people Māori are connected to.*

[16] Waitangi Tribunal Tāmaki Makaurau Settlement Process Report, Wai 1362, page 95
[17] Letter from Tūpuna Maunga Authority dated 23 September 2025.

Together with other named features of the land – rivers, lakes, blocks of land, promontories, holes in the ground, fishing grounds, trees, burial places, and islands – they form a cultural grid over the land which provides meaning, order, and stability to human existence. Without the fixed grid of named features we would be total strangers on the land – lost souls with nowhere to attach ourselves[18].

80. In respect of section 6(f) of the RMA, the Tūpuna Maunga are historic heritage places.

81. The cultural significance of the maunga to iwi goes beyond the identified mapped extent of the Outstanding Natural Features and Historic Heritage sites, and beyond the land owned and managed by the Maunga Authority. The flanks of the maunga are important parts of the spiritual and cultural identity of the maunga. Protection of these areas by way of the HBSA controls is considered to be an important part of the responsibilities under section 6(e) of the RMA. The following is quoted from the Tūpuna Maunga Authority's input:

The tihi is the most sacred part of the maunga to mana whenua. The volcanic viewshafts capture selected views of the tihi from the points of origin. HSA's are critical to retaining the profile and integrity of the maunga. This gives meaning to the landmark and its individual qualities, making it immediately recognisable to mana whenua. The HSA can also protect visual evidence of mana whenua occupation of the maunga, showing far more than can be seen from the viewshafts point of origin.

82. Iwi participation legislation recognises the rangatiritanga of Mana Whenua over their ancestral lands and taonga. Auckland's Tūpuna Maunga hold a paramount place in the historical, spiritual, ancestral and cultural identity of the 13 iwi and hapū of Ngā Mana Whenua o Tāmaki Makaurau (the mana whenua tribes of Auckland). In 2014 the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed was passed into law. As part of this Treaty of Waitangi settlement, 14 Tūpuna Maunga were returned to the 13 mana whenua iwi and hapū of Auckland. The Tūpuna Maunga Authority is the statutory authority established under the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 to govern the fourteen Tūpuna Maunga of Tāmaki Makaurau / Auckland. The Authority is comprised of equal membership from Ngā Mana Whenua o Tāmaki Makaurau and Auckland Council, together with Crown (non-voting) representative.

83. The Tūpuna Maunga Authority has developed a set of plans and policies to guide how the Tūpuna Maunga are valued, protected, restored, enhanced, and managed into the future. These include the Tūpuna Maunga Integrated Management Plan (**IMP**), Tūpuna Maunga Integrated Management Plan Strategies, and the Tūpuna Maunga Authority Operational Plan. As part of the Design Strategy Principles set out in the Tūpuna Maunga Integrated Management Plan Strategies, the Maunga Authority provide direction to use and development which affects the Tūpuna Maunga, including that:

[18] Quoted from Te Māori – Māori Art From New Zealand Collections, S.M. Mead, 1984, p20

"*Development will be designed and located to minimise visual impact and to maintain the pre-eminence of the tihi, Maunga to Maunga sightlines and volcanic viewshafts*."

84. The IMP states (page 65):

> *"The Tūpuna Maunga are among the most treasured and distinctive connected landscape features of Tāmaki Makaurau that are both natural and modified. The Tūpuna Maunga create and contribute to Aucklanders sense of pride, 'place' and home.*
>
> *The ability to view these taonga from all over Auckland – the most populated part of New Zealand – and from other maunga is valued for this reason. The Tūpuna Maunga are a place to see and experience other parts of Tāmaki Makaurau.*
>
> *The significance of the Tūpuna Maunga to mana whenua and all Aucklanders creates an opportunity to ensure the protection and enhancement of the physical and visual integrity of these natural features in the surrounding urban environment. Their significance includes the distinctive and impressive earthworks such as terracing, rua (storage pits), and defences, which are characteristic of pā on the maunga. These reflect the extent and nature of past use and occupation of the Tūpuna Maunga by mana whenua, and are of exceptional archaeological significance both nationally and internationally.*
>
> *The Tūpuna Maunga are a part of the naturally preserved, young, monogenetic basaltic volcanic field in Aotearoa/New Zealand. They are the most visible reminder to people of the volcanic field on which we live, and are important to our understanding of Auckland's geological history."*

85. In exercising its powers and carrying out its functions under the Collective Redress Act, the Tūpuna Maunga Authority must have regard to the spiritual, ancestral, cultural, customary, and historical significance of the Tūpuna Maunga to Ngā Mana Whenua. The Authority must also prepare and approve an IMP. The IMP sets the direction for protection, restoration and enhancement of the maunga. The IMP recognises those values that make the Tūpuna Maunga unique and iconic. These values include section 6 of the RMA – matters of national significance. The Tūpuna Maunga are among the most significant spiritual, cultural, historical, archaeological and geological landscapes in the Auckland region. The Tūpuna Maunga are sacred to mana whenua as taonga tuku iho (treasures handed down the generations). Ngā Mana Whenua therefore secured the statutory requirement for an IMP to ensure the future of each of these treasured places will be organised with equal consideration and reverence. They have come to be treasured and celebrated by all communities for their striking landscape and heritage features, the distinct identity and sense of place they inspire and their value as open spaces for all Aucklanders to be active, and for respite, relaxation and escape from busy urban lives.

86. In respect of all of the matters referred to above, it is also considered that section 8 of the RMA is relevant and that decision makers should take into account the principles

of the Treaty of Waitangi/Te Tiriti o Waitangi. Section 8 recognises the rangatiritanga of Mana Whenua over their ancestral lands and taonga. Auckland's Tūpuna Maunga hold a paramount place in the historical, spiritual, ancestral and cultural identity of the 13 iwi and hapū of Ngā Mana Whenua o Tāmaki Makaurau (the mana whenua tribes of Auckland).

87. Additionally, the losses described above would be contrary to section 7 of the RMA which directs all persons exercising functions and powers under the RMA to have particular regard to:

(b) the efficient use and development of natural and physical resources

(c) The maintenance and enhancement of amenity values

(f) Maintenance and enhancement of the quality of the environment

(g) Any finite characteristics of natural and physical resources

88. For the above reasons, the higher densities specified by clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 of the NPS-UD may be inappropriate in areas covered by a MV and / or HBSA as they would conflict with the sections 6 and 7 of the RMA and taking into account section 8. By identifying the MVs and HBSAs as a Qualifying Matter, which can modify the requirements of NPS-UD Policy 3 and Clause 4(1)(b) and (c) of Schedule 3C of the RMA, the conflict between the competing parts of the legislation is resolved. This report concludes that the MVs and HBSAs are a Qualifying Matter and can modify height and density of urban form to allow the council to meet its obligations under Part 2 sections 6, 7 and 8 of the RMA in accordance with sections 31, 72 and 74 of the RMA.

89. While it is acknowledged that there may be circumstances in which built form enabled by Policy 3 of the NPS-UD and Clause 4(1)(b) and (c) of Schedule 3C of the RMA will not have adverse effects such as those listed above, the requirement for a resource consent to establish this is not considered to be overly onerous when balancing the objectives of the NPS-UD against the councils responsibilities under Part 2 of the RMA.

4. AUP approach to managing qualifying matter

90. The AUP currently manages the qualifying matter through provisions in the RPS chapters (principally, B4.2 and B4.3), mapping of MVs and HSAs, and overlay provisions (Chapter D14) - see **Appendix C**. The purpose of the overlay is described in Chapter D14 as follows:

> The purpose of the Maunga Viewshafts and Height Sensitive Areas Overlay is to appropriately protect significant views of Auckland's volcanic cones through the use of viewshafts and height sensitive areas. The volcanic viewshafts and height sensitive areas are identified on the planning maps.

This overlay contributes to Auckland's unique identity by protecting the natural and cultural heritage values of significant maunga cones.

This overlay incorporates three elements:

(1) Regionally significant maunga viewshafts which protect regionally significant views to the Auckland maunga. Buildings that intrude into a regionally significant maunga viewshaft require restricted discretionary activity consent up to 9m in height, beyond which they are a non-complying activity.

(2) Locally significant maunga viewshafts manage development to maintain locally significant views to the Auckland maunga. Buildings that intrude into a locally significant maunga viewshaft are a permitted activity up to 9m in height, beyond which they are a restricted discretionary activity.

(3) Height sensitive areas are areas of land located on the slopes and surrounds of the maunga cones. These areas are mapped and are identified as a layer on the planning maps and are marked with the following symbol: ▼

Height sensitive areas enable reasonable development in areas where the floor of the viewshaft is less than 9m (the maximum height in Residential – Single House Zone and Residential – Mixed Housing Suburban Zone). They also ensure that development is of a scale and/or location that does not dominate the local landscape or reduce the visual significance or amenity values of the maunga feature. Buildings are a permitted activity up to a defined maximum height beyond which they are a non-complying activity. An additional height control applies at the boundary of a maunga feature.

91. Appendix 20 to the AUP provides a values assessment of the MVs and HSAs.

92. It is the council's view (supported by input from the Tūpuna Maunga Authority (**Appendix B)**) that a purpose of the MVs and HSA provisions is to recognise and provide for the following matters of national importance:

a. the protection of the Tūpuna Maunga (which are outstanding natural features) from inappropriate subdivision, use, and development under section 6(b) of the RMA;

b. the relationship of Māori and their culture and traditions with their ancestral lands, waahi tapu, and taonga (under s6(e) of the RMA); and

c. the protection of the Tūpuna Maunga (which are historic heritage places) from inappropriate subdivision, use, and development under section 6(f) of the RMA.

93. In other words, the MVs and HSAs are AUP provisions that recognise and provide for the matters of national importance in sections 6(b), (e) and (f) of the RMA, despite the provisions applying to some areas outside of the maunga themselves.

Objectives and Policies (existing)

94. The relevant AUP objectives and policies, that support the Maunga Viewshafts and Height and Building Sensitive Areas Overlay and the associated provisions in Chapter D14 of the AUP as a qualifying matter are as shown below in **Table 5**[19]:

Table 5: Relevant Objectives and Policies

AUP Chapter	Objective / Policy	Summary of matter addressed
B2.4 Residential Growth	*(*Policy B2.4.2 (4*a) Provide for lower residential intensity in areas: where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character; …*	This policy recognises that issues that can arise, including in relation to adverse effects on natural heritage and mana whenua values, may need to be responded to through providing for lower residential intensity.
B4.2. Outstanding natural features and landscapes	*Objective B4.2.1(1) Outstanding natural features and landscapes are identified and protected from inappropriate subdivision, use and development.*	The objectives and policies in B4.2 help manage the outstanding natural landscapes and outstanding natural features in an integrated manner to protect, and where practicable and appropriate, enhance their values. A key objective is B4.2.1(3) that recognises not only the visual but also the physical integrity and the historic, archaeological and cultural values of Auckland's volcanic features. This objective is supported, in particular, by Policies B4.2.2(6) and B4.2.2(7).
	Objective B4.2.1(2) The ancestral relationships of Mana Whenua and their culture and traditions with the landscapes and natural features of Auckland are recognised and provided for.	
	Objective B4.2.1(3) The visual and physical integrity and the historic, archaeological and cultural values of Auckland's volcanic features that are of local, regional, national and/or international significance are protected and, where practicable, enhanced.	
	Policy B4.2.2(6) Protect the physical and visual integrity of Auckland's outstanding natural features from inappropriate subdivision, use and development.	
	Policy B4.2.2(7) Protect the historic, archaeological and cultural integrity of regionally significant volcanic features and their surrounds.	

[19] For a wider context analysis of objectives and policies see the AHPI s32 Overview Report

AUP Chapter	Objective / Policy	Summary of matter addressed
	Policy B4.2.2(8) Manage outstanding natural landscapes and outstanding natural features in an integrated manner to protect and, where practicable and appropriate, enhance their values.	
B4.3. Viewshafts	*Objective B4.3.1(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.* *Objective B4.3.1(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.* *Policy B4.3.2(3) Protect significant views to and between maunga by:* *(a) avoiding subdivision, use and development that would:* *(i) result in significant modification or destruction of view; or* *(ii)significantly detract from the values of the view; and* *(b) avoiding where practicable, and otherwise remedying or mitigating, adverse effects of subdivision, use and development that would:* *i. result in the modification of the view; or* ii. *detract from the values of the view.* *Policy B4.3.2(4) Protect the visual character, identity and form of maunga by:* *(a) identifying height sensitive areas around the base of maunga; and* *(b) establishing height limits in such areas which control future development that could encroach into views and erode their significance.*	The objectives and policies in B4.3 are specific to Maunga Viewshafts and the Height Sensitive Areas. A key objective is B4.3.1(1) '*significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development*'. This Objective is supported by policies B4.3.2(1) to (4).

AUP Chapter	Objective / Policy	Summary of matter addressed
Chapter D14 Volcanic viewshaft and height sensitive area overlay	*Objective D14.2.(1) The regionally significant views to and between Auckland's maunga are protected.*	Objective 1 relates to regionally significant views to and between maunga and seeks that they are protected.
	Objective D14.2.(2) The locally significant views to Auckland's maunga are managed to maintain and enhance the visual character, identity and form of the maunga in the views.	Objective 2 relates to the management of locally significant views to maunga.
	Policy D14.3.(1) Protect the visual character, identity and form of regionally significant volcanic maunga, together with local views to them, by: *(a) locating height sensitive areas around the base of the volcanic maunga;* *and* *(b) imposing height limits which prevent future encroachment into views of the volcanic maunga that would erode the visibility to their profile and open space values, while allowing a reasonable scale of development*	Policy 1 sets out how views are to be managed, including via HSAs and height limits that are related to views.
	Policy D14.3.(2) Manage subdivision, use and development to ensure that the overall contribution of the regionally significant volcanic maunga scheduled as outstanding natural features to the landscape of Auckland is maintained and where practicable enhanced, including by protecting physical and visual connections to and views between the volcanic maunga.	Policy 2 relates to the management of subdivision, use and development including by protecting physical and visual connections to and views between the maunga.
	Policy D14.3.(3) Protect the historic, archaeological and cultural integrity of regionally significant volcanic features and their surrounds by avoiding activities that detract from these values and the mana of the maunga.	Policy 3 requires avoiding activities that detract from the historic, archaeological and cultural integrity of regionally significant volcanic features and their surrounds.
	Policy D14.3.(4) Avoid new buildings or structures that intrude into volcanic viewshafts scheduled in Schedule 9 Volcanic Viewshafts Schedule, except:	Policy 4 makes specific reference to the Schedule 9 Volcanic Viewshafts Schedule. Intrusions into the viewshafts are to be avoided unless they are

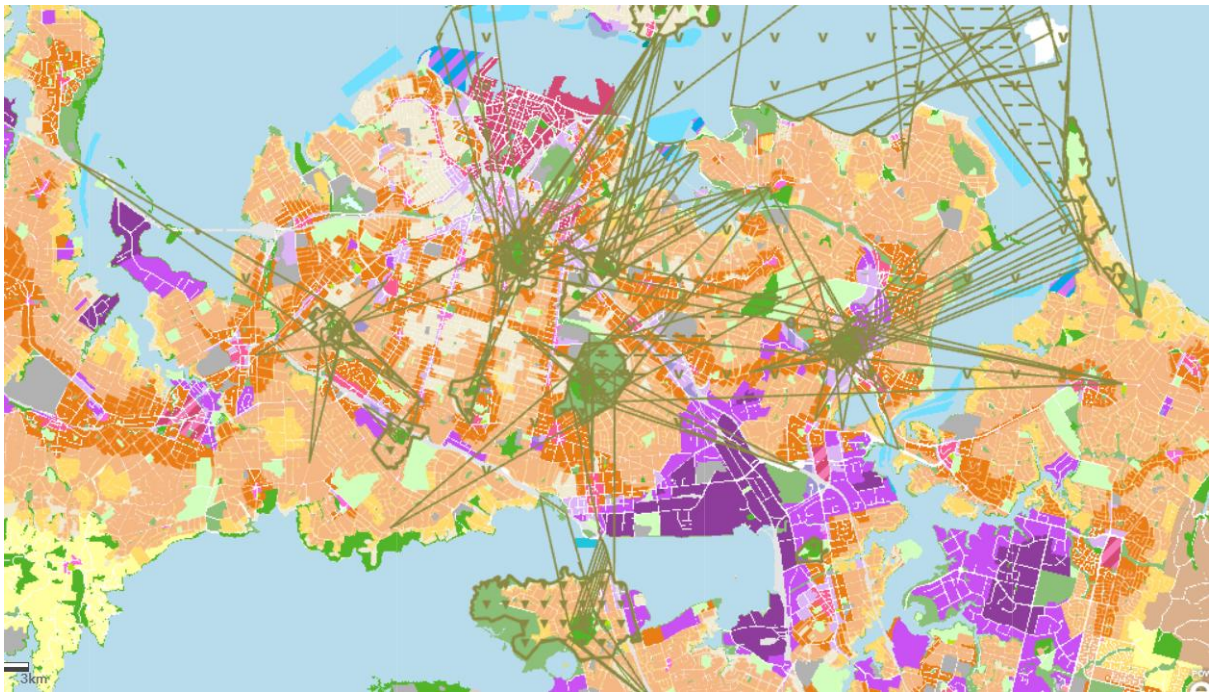
AUP Chapter	Objective / Policy	Summary of matter addressed
	(a) where they would have no adverse effect on the visual integrity of the volcanic maunga as seen from the identified viewing point or line; or *(b) to allow development up to a two-storey height to intrude into a volcanic viewshaft, where any adverse effect of development is avoided or mitigated; or* *(c) to allow development located within an identified height sensitive area up to defined appropriate height limits; or* *(d) to allow the provision of infrastructure where there are particular functional or operational needs that necessitate a structure that penetrates the floor of a volcanic viewshaft, there is no reasonably practicable alternative and adverse effects of development are avoided or mitigated.*	of a permitted height or they would have no adverse effect on the visual integrity of the volcanic maunga as seen from the identified viewing point or line, or are necessary infrastructure
	Policy D14.3.(5) Avoid new buildings or structures that exceed two storeys in height in a height sensitive area, except where they would have no adverse effect on the visual integrity of any volcanic maunga to which that height sensitive area relates, as seen from any public place.	Policy 5 acknowledges a two-storey height as being appropriate in HSAs and provides for height exceeding that height only where there would be no adverse effect on the visual integrity of the maunga
	Policy D14.3.(6) Require urban intensification to be consistent with the protection of volcanic features and viewshafts	Policy 6 specifically relates to urban intensification which is required to be consistent with the protection of volcanic features and viewshafts

95. Additionally, the following Chapters have objectives and policies which are relevant:
    - Historic Heritage B5.2
    - Outstanding and High Natural Character Overlays B8.2, B8.3 and B8.4
    - Hauraki Gulf Marine Park Act, and associated provisions in B8.5 of the AUP.
    - Mana Whenua B6

Rules and methods (Operative)

96. The Maunga Viewshafts and Height and Building Sensitive Areas Overlay (Chapter D14) includes scheduled[20] and mapped[21] locations within the region within which development is managed to protect views to and between the maunga. Both the MVs and the HSAs can be located on the AUPGIS viewer by clicking on the following links: Management Layer – Overlays – Natural Heritage – Regionally Significant Maunga Viewshafts and Height Sensitive Areas Overlay (rcp/dp) and Regionally Significant Maunga Viewshafts Overlay Contours and Locally Significant Maunga Viewshafts Overlay Contours.

97. MVs manage wider range views to the maunga which have been classified as having local or regional significance. MVs are 3-dimensional planes in the sky. The viewshafts have an origin point or if they are linear they have an origin line (series of points), and a destination line (series of points). The views originate from major public viewpoints such as motorways and main roads through which many people travel. The overlay is displayed over the respective maunga – see the partial AUP Map (PC 120) below.



Map 6 MVs and HBSAs (Overlay on PC 120 Zoning Map based on data from the 28th August 2025 version)

98. The surveying coordinates for the MVs are located under Schedule 9 Maunga Viewshafts Schedule of the AUP. Most of the viewshafts start at 1m above ground (person sitting in a car level), or at 1.5m above ground (person standing) at the view origin point. The destination line (points) is across the maunga. In some cases, the

[20] See Schedule 9 and Appendix 20 of the AUP
[21] See Auckland Council Auckland Unitary Plan Operative in Part (16 Nov 2016) GEOMAPS map layers

destination line frames the whole maunga and may provide some context (e.g. the sea provides context for Rangitoto in T2), whereas in other cases only parts (e.g. the top of Rangitoto in T8) of the maunga fall within the destination line.

99. The Maunga Viewshafts Overlay Contours generally indicate what height of building is possible without intruding into a MV. A survey measurement may be required if a building is close to a contour.

100. Overall, a site's location regarding the viewshaft origin point is a key factor. The closer to the origin point, the higher the probability of intruding into a viewshaft and/or erecting a building within the protected view. Under the current operative provisions, in table D14.4.1, such buildings require an restricted discretionary activity (**RDA**) application. The RDA assessment associated with activity (A3) manages the effects of intruding into the MV from the origin point.

101. It is, however, a permitted activity to build up to the floor of a MV. Development that intrudes into a viewshaft, but is not higher than 9m, is a permitted activity for locally significant MVs, but becomes a restricted discretionary activity for regionally significant MVs – requiring further assessment. Development above 9m high that intrudes into a locally significant MV must also be assessed as a restricted discretionary activity, whereas, for regionally significant MVs it is a non-complying activity.

102. The MVs and HSAs are in scheduled[22] and mapped[23] locations within the region within which development is managed to protect views to the maunga. Both the MVs and HSA can be located on the AUP GIS viewer by clicking on the following links: Management Layer – Overlays – Natural Heritage – Regionally Significant Volcanic Viewshafts and Height Sensitive Areas Overlay (rcp/dp) and Regionally Significant Volcanic Viewshafts Overlay Contours and Locally Significant Volcanic Viewshafts Overlay Contours.

103. HSAs are located around the base of some of the cones which protect local public views to the mountains. Height in a HSA must comply with the rolling height method, i.e. height is measured from the contours of the ground. This ensures that development reflects the contours of the maunga. It is a permitted activity to build up to 9m in a HSA, with the exception of Devonport, where permitted development is enabled up to 13m in some places (refer Figure D14.10.1). Development above these height limits requires assessment as a non complying activity. HSAs enable reasonable development in areas around the maunga, while the use of the rolling height method ensures that development follows the contours of the maunga. This ensures that, even where the flanks of individual maunga are covered by houses, it still remains possible to discern the maunga's underlying form over a distance.

[22] See Schedule 9 and Appendix 20 of the AUP
[23] See the Auckland Council AUP Overlay maps

AUP Amendments

104. The council considers that height is currently effectively being managed in both MVs and HSAs. In his report titled s.32 Landscape Report on the National Policy Statement on Urban Development & the Housing Enabling Act, Mr. Brown has raised concerns about the increase bulk and density being built in the HSA through the proposed upzoning in these areas sought as part of this plan change (PC120). The council has relied on Mr. Brown's expert guidance in writing this report and proposes additional provisions in HSAs to deal with these adverse effects. Amendments are proposed to Chapter D14 to address the adverse effects of increased building intensity on the views to maunga and the landscape and form of the maunga, and to better recognise the cultural importance of the maunga. The amendments recognise the importance of maintaining:

- A minimum degree of visibility in relation to the maunga;
- A minimum degree of alteration to the natural form of the maunga (individually and cumulatively); and
- Protection of their physical integrity, as well as their visual integrity.

105. As such, the proposed provisions seek to offer a level of protection commensurate with that offered by previous provisions, even though the new zonings proposed enable greater intensity of development. The proposed provisions also ensure consistency with existing provisions, including new Policy D14.3.(6) which specifically references the protection of maunga in the context of residential intensification. These amendments are set out in **Appendix D** and include:

1. A proposed new Objective D14.2(3) and Policy D14.3 (5A) which seek to manage additional adverse effects caused by greater building intensity in (renamed) Height and Building Sensitive Areas (HBSAs). The new objective and revised Policy (1) are[24].

   Objective (3)
   The height and buildings sensitive areas are managed to protect the visual character, cultural significance, identity, physical integrity and form of the maunga

   Policy (1)

   Protect the unique visual character, cultural significance, identity, physical integrity and form of regionally significant maunga, together with local views to them, by:

[24] Consequential changes are also proposed to Policy (1) and Policy (5)

(a) *locating height and building sensitive areas around the base of the maunga;*

(b) *imposing height and built form limits which prevent future encroachment into views of the maunga that would erode the visibility to their profile and open space values, and cultural values, while allowing a reasonable scale of development;*

(c) *minimising earthworks and retaining walls;*

(d) *within residential zones, limiting building coverage and landscaped area and ensuring separation of buildings to maintain and enhance visual permeability to the slopes of the maunga; and*

(e) *respecting the maunga as sacred places to mana whenua.*

2. Chapter D14 will accordingly be subject to new standards including:

   (a) a building coverage standard within residential zones of 35%;

   (b) a new landscaped area standard within residential zones of 40%;

   (c) a new earthworks standard within residential zones to protect landscape and cultural values; and

   (d) any proposal for a departure from the above standards will require consent as a restricted discretionary activity.

   These and any other breaches of the underlying residential zone yards metric will need to have regard to the D14 objectives, policies, matters and assessment criteria.

106. These new controls have been assessed as necessary to give effect to the existing objective and policy framework outlined above, while still accommodating – through applications for resource consent - the achievement of a greater intensity of development than has been possible in the past, overall.

107. It has also been recognised that the operative Chapter D14 Objective (2) and Policy (1) should refer to the cultural significance of the maunga by adding the underlined words below. This will make that objective more consistent with other objectives and policies that already recognise, generally or specifically, cultural significance.

Objective (2) *The locally significant views to Auckland's maunga are managed to maintain and enhance the visual character, cultural significance, identity and form of the maunga in the views.*

Policy (1) *Protect the visual character, cultural significance, identity and form of regionally significant maunga, together with local views to them, by:..*

108. Related to the above is a zoning component. To date, the zoning of any site has not been affected by the presence of a MV, whereas zone densities have, in the past, been maximised in HBSA areas. In general, PC 120 upzones areas covered by the HBSAs. However, some of the rezonings proposed, in particular those for some walkable catchments, could have been zoned Residential - Terraced Housing and Apartment Buildings (**THAB)** were it not for the presence of a HBSA. Instead, the highest density residential zone now proposed for such areas is the Residential – Mixed Housing Urban (**MHU**) Zone. The reason for this is that the controls on building height, building coverage and landscaped area that are considered necessary to maintain the values of the maunga, and views to them, are considered to be inconsistent with the standards normally applicable to a THAB Zone. Even the MHU provisions and standards vary appreciably, but MHU zoning recognises that there may be limited opportunities (as a restricted discretionary activity) to maximise intensification in some circumstances.

5. Development of Options

109. 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 PC 78, 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 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.

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

111. The 5 options that have been evaluated in the section 32 and Schedule 3C assessment of the Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying matter qualifying matter are:

Option 1: Retain the operative MV / HSA overlay without amendment and do not amend zoning to take into account that overlay.

Option 2: Remove the operative MV / HSA overlay and make no other changes.

Option 3: Retain the MVs and remove HSAs, and manage effects of development on maunga through applying a combination of Residential – Single House and Residential – Mixed Housing Suburban zoning in the current HSA areas.

Option 4: Amend the operative MV / HSA overlay with provisions relating to additional building standards in HBSAs (residential zones only), including references to cultural values. Ensure general alignment between the MV / HSA overlay and zonings within the HBSAs while still enabling higher densities in those areas.

Option 5: Amend the operative MV / HSA overlay by amending the mapping for Maunga Viewshafts and / or HSAs.

6. Evaluation of Options

112. To determine the most appropriate response for the Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter, each of the options needs to be evaluated in the context of the objectives and of clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 of the NPS-UD. The following tables provide an assessment of the options against the evaluation criteria, with further comment below the tables.

Option 1: Retain the operative MV / HSA overlay without amendment and do not amend zoning to take into account that overlay

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 1 –** Retain the operative MV / HSA overlay without amendment and do not amend zoning to take into account that overlay
Costs of applying QM – housing supply / capacity (clause 8(2)(b) Schedule 3C of the RMA)	Housing supply / capacity reduced from what otherwise may be possible under the zoning, due to the height controls imposed by Maunga Viewshafts and in HSAs (noting that, given zoning changes housing supply / capacity in the D14 overlay is still increased over the operative plan and overall housing supply / capacity still gives effect to Policy 3 NPS-UD)

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 1 –** Retain the operative MV / HSA overlay without amendment and do not amend zoning to take into account that overlay
Costs: Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Limits what may otherwise be greater intensification opportunities and, particularly in defined walkable catchments, a greater population having access to public transport, jobs and services
Costs: Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Does not adequately recognise RMA s6, s7 or s8 matters
Benefits of applying the QM – Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Goes a limited way towards recognising the 50+ year protection of defined long and short-range views of the maunga and the importance of the maunga to iwi and the community
Benefits – Economic (clause 8(2)(c) Schedule 3C of the RMA)	Through ensuring overall that housing supply / capacity gives effect to Policy 3 NPS-UD, enables significant development to occur without affecting some of the actual or potential benefits gained through the community and visitors having access to views of the maunga
Benefits – Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Environmental benefits related to the limited degree to which RMA s6, s7 and s8 matters are recognised
Effectiveness and efficiency	As the overlay reflects the operative AUP overlay its efficiency is well-proven. However, the effectiveness of this overlay would be diminished through non-alignment with the upzoning in PC 120 and adverse effects arising from the greater density of development, particularly in HSAs.

113. Option 1 retains the existing operative AUP MV / HSA overlay and Chapter D14 provisions, without affecting the zoning of land which may otherwise have been proposed in PC 120. Retaining the existing MVs and HSAs limits the greater intensification opportunities that might otherwise be achieved and, particularly in defined walkable catchments, the provision of access to public transport, jobs and services for a larger population.

114. Under this option there would be no relationship between the MVs and HSAs and the zoning. The existing QM would continue to apply, without any changes. That creates at least two issues.

115. First, the highest density residential zone – THAB – enables development at a significantly higher height (22m+) than is possible within a HSA (9m). At a 9m height it is unlikely that apartments will be established. There needs to be attention given to what maximum density zoning should be imposed to reasonably align with the HSA standards. PC 120 applies, at a maximum, the Residential - Mixed Housing Urban

Zone to HBSAs[25]. This approach has not been taken outside HBSAs where MVs apply because there is a considerable variation in possible heights under MVs.

116. Second, significant up-zoning of HSA areas is still proposed, consistent with the general upzoning approach taken in PC 120. However, this creates the potential for the adverse effects outlined in the Section 2 Issues part of this s32 Report. It is considered that those potential adverse effects need to be managed through additional controls on building and earthworks.

117. This option does not give sufficient effect to RMA s6, s7 or s8 matters, nor to relevant RPS objectives and policies. It is not consistent with iwi participation legislation, nor does it afford adequate recognition to MVs and HSAs as an existing qualifying matter.

Option 2: Remove the operative MV / HSA overlay and make no other changes

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 2 -** Remove the operative MV / HSA overlay and make no other changes
Costs of applying QM – housing supply / capacity (clause 8(2)(b) Schedule 3C of the RMA)	QM not applied so no effects on housing supply / capacity
Costs: Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Removes the 50+ year protection of defined long and short-range views of the maunga and does not recognise the importance of the maunga to iwi and the community
Costs: Economic (not otherwise covered by housing capacity issues) (clause 8(2)(c) Schedule 3C of the RMA)	Covered by housing capacity issues
Costs: Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Does not give effect to RMA s6, s7 or s8 matters
Benefits of applying the QM – Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Enables greater intensification and, particularly in defined walkable catchments, a greater population having access to public transport, jobs and services
Benefits – Economic (clause 8(2)(c) Schedule 3C of the RMA)	Enables greater intensification and, particularly in defined walkable catchments, a greater population having more ready access to jobs

[25] There are limited exceptions to this where some generally large sites at the edge of a HSBA have been zoned Residential – Terraced Housing and Apartment Buildings Zone. Examples include 55-85 Mountain Road, Epsom, and 24 Essex Road, Mount Eden.

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 2 -** Remove the operative MV / HSA overlay and make no other changes
Benefits – Environmental (clause 8(2)(c) Schedule 3C of the RMA)	No environmental benefits
Effectiveness and efficiency	The absence of the MV / HSA overlay will allow no MV / HSA constraint to the efficient achievement of clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 of the NPS-UD. However, the option would not be effective in giving effect to Part 2 of the RMA and relevant AUP RPS objectives.

118. Option 2 removes the existing MVs and HSAs and makes no other changes that recognise the values of the maunga. This option allows greater intensification opportunities and, particularly within defined walkable catchments, would provide access to public transport, jobs and services for a larger population.

119. This option does not give effect to RMA s6, s7 or s8 matters, nor to relevant RPS objectives and policies. The option is not contrary to iwi participation legislation. The option does not give adequate recognition to MVs and HSAs as an existing qualifying matter.

Option 3: Retain the MVs and remove HSAs, and manage effects of development on maunga through applying a combination of Residential – Single House and Residential – Mixed Housing Suburban zoning in the current HSA areas

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 3 –** Retain the MVs and remove HSAs, and manage effects of development on maunga through applying a combination of Residential – Single House and Residential – Mixed Housing Suburban zoning in the current HSA areas
Costs of applying QM – housing supply / capacity (clause 8(2)(b) Schedule 3C of the RMA)	Housing supply / capacity reduced due to not applying zones allowing higher density, e.g. in defined walkable catchments, potentially over constrains development potential
Costs: Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Limits what may otherwise be greater intensification opportunities and, particularly in defined walkable catchments, a greater population having access to public transport, jobs and services
Costs: Economic (not otherwise covered by housing capacity issues) (clause 8(2)(c) Schedule 3C of the RMA)	Covered by housing capacity issues

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 3 –** Retain the MVs and remove HSAs, and manage effects of development on maunga through applying a combination of Residential – Single House and Residential – Mixed Housing Suburban zoning in the current HSA areas
Costs: Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Does not adequately recognise RMA s6, s7 or s8 matters
Benefits of applying the QM – Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Goes a limited way towards recognising the 50+ year protection of defined long and short-range views of the maunga and the importance of the maunga to iwi and the community
Benefits – Economic (clause 8(2)(c) Schedule 3C of the RMA)	Through ensuring overall that housing supply / capacity gives effect to Policy 3 NPS-UD enables significant development to occur without affecting some of the actual or potential benefits gained through the community and visitors having access to views of the maunga
Benefits – Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Environmental benefits related to the limited degree to which RMA s6, s7 and s8 matters are recognised
Effectiveness and efficiency	The absence of the MV / HSA overlay and reliance on zoning and zoning provisions would be less efficient, less likely to achieve the requirements of clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 of the NPS-UD and not be effective in giving effect to Part 2 of the RMA and relevant AUP RPS objectives.

120. Option 3 retains the existing MVs. The existing HSAs are removed and instead replaced with lower density residential zones - Residential - Single House and Residential - Mixed Housing Suburban - that have heights and other controls similar to those applied within the HSAs and proposed (amended) HBSAs. This raises at least three issues.

121. First, the existing residential zone policies and criteria would not afford sufficient management of the effects of over-height development on the tūpuna maunga, or the effects of building development that otherwise infringes bulk and location controls. The residential zone provisions would need to be modified to take into account these matters. The administration of those provisions would be problematic and uncertain without a spatial identification of where they should apply.

122. Second, it is not the intention of the HBSA provisions to prevent higher density development which is within the HBSA height control, and which does not adversely affect the open space and maunga ‘form values’ that the new standards seek to manage. Subject to a RDA consent, higher densities may still be possible in the Residential - Mixed Housing Urban zonings proposed for significant areas of HBSA.

123. Third, not all HBSAs are in residential zones. Devonport is a notable example of where a business zoning applies, together with other zones, including Special Purpose Zones.

124. This option does not give sufficient effect to RMA s6, s7 or s8 matters, nor to relevant RPS objectives and policies. The option is not consistent with iwi participation legislation. The option does not give adequate recognition to HSAs being an existing qualifying matter.

Option 4: Amend the operative MV / HSA overlay by including additional building standards in HBSAs, with additional reference to cultural values

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 4 –** Amend the operative MV / HSA overlay by including additional building standards in HBSAs (residential zones only), with additional reference to cultural values. Ensure general alignment between the MV / HSA overlay and zonings within the HBSAs while still enabling higher densities in those areas.
Costs of applying QM – housing supply / capacity (clause 8(2)(b) Schedule 3C of the RMA)	Housing supply / capacity reduced, including compared to Options 1 and 5, due to the height and building controls imposed by MVs and in HSAs (noting that, given zoning changes housing supply / capacity in the D14 overlay is still increased over the operative plan and overall housing supply / capacity still gives effect to Policy 3 NPS)
Costs: Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Limits what may otherwise be greater intensification opportunities and, particularly in defined walkable catchments, a greater population having access to public transport, jobs and services
Costs: Economic (not otherwise covered by housing capacity issues) (clause 8(2)(c) Schedule 3C of the RMA)	Covered by housing capacity issues
Costs: Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Recognises RMA s6, s7 and s8 matters
Benefits of applying the QM – Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Recognises iwi and community interest in retaining views of maunga and managing development effects on maunga
Benefits – Economic (clause 8(2)(c) Schedule 3C of the RMA)	Through ensuring overall that housing supply / capacity gives effect to Policy 3 NPS-UD enables significant development to occur without affecting the actual or potential benefits gained through the community and visitors having access to views of the maunga
Benefits – Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Environmental benefits related to ensuring RMA s6, s7 and s8 matters are recognised

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 4 –** Amend the operative MV / HSA overlay by including additional building standards in HBSAs (residential zones only), with additional reference to cultural values. Ensure general alignment between the MV / HSA overlay and zonings within the HBSAs while still enabling higher densities in those areas.
Effectiveness and efficiency	Through carrying over and modifying the operative AUP overlay its efficiency remains well-proven, acknowledging that further resource consent processes will be necessary with the additional controls. This option does constrain full achievement of the requirements of clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 of the NPS-UD however is the most effective option in giving effect to Part 2 of the RMA and relevant AUP RPS objectives.

125. Option 4 carries over the existing mapping and provisions as they relate to MVs, HSAs and height, renames HSAs to HBSAs, adds provisions relating to building development in residential zones, and adds to / clarifies provisions relating to the importance of cultural values. This option limits the greater intensification opportunities that might be otherwise achieved, particularly within defined walkable catchments, by providing more access to public transport, jobs and services for a larger population having. Less development would be enabled than Options 1, 2 and 5.

126. This option gives effect to RMA s6, s7 or s8 matters, and to relevant RPS objectives and policies. The option is consistent with iwi participation legislation. The option recognises MVs and HSAs as being an existing qualifying matter with the modifications in the HBSAs also being a qualifying matter.

Option 5: Amend the operative MV / HSA overlay by amending the mapping for Maunga Viewshafts and / or HSAs

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 5 –** Amend the operative MV / HSA overlay by amending the mapping for MVs and / or HSAs
Costs of applying QM – housing supply / capacity (clause 8(2)(b) Schedule 3C of the RMA)	Reductions in Housing supply / capacity potentially zero or limited in key locations, e.g. in defined walkable catchments
Costs: Social / Cultural (clause 8(2)(c) Schedule 3C of the RMA)	Through opting for intensification over maunga protection partially removes the 50+ year protection of the currently defined long and short-range views of the maunga and in those areas does not fully recognise the importance of the maunga to iwi and the community
Costs: Economic (not otherwise covered by housing capacity issues) (clause 8(2)(c) Schedule 3C of the RMA)	Covered by housing capacity issues

Maunga Viewshafts and Height and Building Sensitive Areas Overlay Qualifying Matter	**Option 5 –** Amend the operative MV / HSA overlay by amending the mapping for MVs and / or HSAs
Costs: Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Does not adequately recognise RMA s6, s7 or s8 matters
Benefits of applying the QM – Social / Cultural(clause 8(2)(c) Schedule 3C of the RMA)	Goes a limited way towards recognising the 50+ year protection of defined long and short-range views of the maunga and the importance of the maunga to iwi and the community
Benefits – Economic (clause 8(2)(c) Schedule 3C of the RMA)	Through ensuring overall that housing supply / capacity gives effect to Policy 3 NPS-UD enables significant development to occur without affecting some of the actual or potential benefits gained through the community and visitors having access to views of the maunga
Benefits – Environmental (clause 8(2)(c) Schedule 3C of the RMA)	Environmental benefits related to the limited degree to which RMA s6, s7 and s8 matters are recognised
Effectiveness and efficiency	The MVs and HSAs have been historically reviewed on a number of occasions up to a recent review of selected MVs. The possibility of removing 3 MVs has been identified but has not been pursued as insufficient consultation has occurred, particularly with respect to mana whenua and iwi, and the impact on capacity is while noticeable, would affect approximately 2,500 business and residential zoned sites.[26] This equates to approximately 9.4% of all the 26,700 sites affected by MVs across the region.

127. Option 5 reviews the mapping of the MVs, with a particular focus on the MVs and HSAs that constrain development in the key locations defined in clause 4(1)(b) and (c) of Schedule 3C of the RMA and Policy 3 the NPS-UD. More development would be enabled than in Options 1, 3 and 4.

128. The mapping of MVs and HSAs have been reviewed on a number of occasions since their introduction in the mid-1970s.

129. A major review was conducted beginning in 1996 when the then Auckland Regional Council commissioned landscape consultancy LA4 (Stephen Brown) to re-evaluate the viewshafts, with a view to possibly amending, deleting and adding viewshafts.

130. In the period 2001 – 2005, the volcanic viewshafts were reviewed again with the assistance of Stephen Brown. This resulted in the method of sightline delineation being updated, employing surveyed ‘base planes’ and ‘side planes’ to establish the true alignment and elevation (relative to ground levels) of each sightline. The review also

[26] This data has been supplied by the council’s Geospatial team in the Auckland-wide Planning unit, and is based on the PC 120 maps as of 1 August 2025. This data does not include sites zoned for Open Space, Coastal or Special Purpose – School purposes.

examined whether or not individual maunga, and views of them, were considered to be 'regionally significant'.

131. This resulted in 28 new viewshafts being added to the Isthmus Section of the Auckland District Plan, 5 being deleted, and amendments to the boundaries of many other existing viewshafts. The 87 viewshafts were subsequently incorporated in part of Change 8 to the Auckland Regional Policy Statement and they were then adopted for a change to the then Isthmus section of the Auckland City Council District Plan (PM339).

132. Further reviews of the HSAs and Volcanic Viewshafts were conducted by Stephen Brown in 2012 / 2013 on behalf of the Council as part of the preparation of the current AUP. That review focussed on 11 viewshafts, because of changes to the environments around them, and the size of a number of HSAs also contracted slightly in size.

133. In the course of the IHP hearings for the AUP, further evaluation of the 87 Volcanic Viewshafts in existence at that time was undertaken in response to matters raised by submitters to the (then) draft PAUP. This review involved a detailed analysis of the values associated with both individual viewshafts and individual maunga, giving rise to the viewshaft 'summary sheets' prepared by Stephen Brown in 2015 and 2016, with comments provided by a range of other landscape architects that had been engaged by submitters to the PAUP. Those summary sheets are now found in the AUP's Schedule 20.

134. There was no further review of the mapping of MVs and HSAs conducted for PC 78. However, a further review by Stephen Brown of selected MVs has been conducted for PC 120[27] (see **Appendix E**). The MVs reviewed include E06, E10, E16, E18, E19, E20, K01, K02, O10, T08, W06, W13 and A13. The brief for this review was:

- *Review the degree to which Maunga Viewshafts (MVs) E10, E16 and E20 might be modified to accommodate greater building height and intensity within and around Auckland's CBD, while maintaining the integrity of the views protected by the MVs to Maungawhau – Mt Eden; and*
- *Re-evaluation of MVs E06, E19, K1, K2, O10, T08, W06 and W13, which were recommended for possible removal or modification in 2015 (in the course of addressing submissions to the Draft AUP), to ascertain whether they should still be retained.*
- *The additional review of MVs E18 and A13 to ascertain if they should be retained.*

135. **Table 6** below summarises the findings of this review.

[27] Landscape Report Review of Maunga Viewshafts: E06, E10, E16, E18, E19, E20, K01, K02, O10, T08, W06, W13 & A13, September 2025

Table 6 2025 MV Review Summary

Maunga Viewshaft:	Maunga Addressed:	Value From a Regional or Local Perspective:	Recommendations:
E10	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E16	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E19	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E20	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E06	**Mt Eden / Maungawhau**	Not Regionally or Locally Significant	Deletion of the MV
E18	**Mt Eden / Maungawhau**	Regionally Significant	Retention of the MV
K01	**Tātua a Riukiuta-Big King**	Regionally Significant	No Change to the MV
K02	**Tātua a Riukiuta-Big King**	Regionally Significant	No Change to the MV
O10	**Maungakiekie-One Tree Hill**	Locally Significant	No Change to the MV Relocation of the street trees in the MV
T08	**Rangitoto**	Locally Significant	No Change to the MV; Possible relocation of its origin point in the future
W06	**Maungarei-Mt Wellington**	Not Regionally or Locally Significant	Deletion of the MV; Possible replacement & relocation of the MV in the future
W13	**Maungarei-Mt Wellington**	Not Regionally or Locally Significant	Deletion of the MV
A13	**Ōwairaka-Mt Albert**	Regionally Significant	Retention of the MV

136. This review concluded that MVs E06, W06 and W13 were not (or no longer) locally or regionally significant from a landscape perspective, and could be deleted from the AUP. MV T08 was identified for possible relocation of its origin point. All other MVs reviewed were considered to be at least locally significant, and no changes were recommended.

137. The council has considered whether MVs E06, W06 and W13 should be deleted as part of the notified PC 120. A decision has been made not to delete those MVs, primarily on the basis that there has been insufficient time to undertake consultation on this matter – with mana whenua, as well as the wider community. In addition, a preliminary analysis is that deletion of these viewshafts would not significantly add to the affected areas'

development capacities, taking into account the other MVs and other AUP constraints applicable to them. The number of properties affected by MVs E06, W06 and W13 and zoned for either business or residential purposes is approximately 2,500 – a figure that is not significant when considered across the Auckland region.

138. It is acknowledged that this review does not encompass all MVs and HSBAs, as time has not allowed for a wider review. As necessary, other MVs and HSBAs will be reviewed in response to any issues raised in submissions.

7. Risks or acting or not acting

139. Section 32(2)(c) of the RMA requires this evaluation to assess the risk of acting or not acting if there is uncertainty or insufficient information about the matter that is the subject of the provisions. In this instance, not acting to either retain or amend Chapter D14, so as to avoid inappropriate development in the MVs and HBSAs, runs the risk of not meeting Part 2 of the RMA, as discussed above.

140. Further, the risk of not including density controls to manage the increase bulk and density will lead to 'infill' of local views and affect the integrity of the view to the maunga. The risk of not acting is therefore greater than of acting.

8. Overall conclusion

141. The purpose of the Maunga Viewshafts and Height and Building Sensitive Areas Overlay as a qualifying matter is to appropriately protect significant views to and between Auckland's maunga through the use of provisions in scheduled and mapped locations, which manage development height and density.

142. The impact on development capacity is difficult to quantify as the effects of PC 120 will differ across the region based on the contour of land, location relative to maunga, the size and location of sites, and existing development.

143. Overall, there is sufficient information to justify the Maunga Viewshafts and Height Sensitive Areas as an existing Qualifying Matter under clause 8(5) of Schedule 3C of the RMA, for the modifications in the Height and Building Sensitive Areas being a new qualifying matter under clause 8(1)(a) of Schedule 3C of the RMA, and that the proposed amendments in PC 120 will manage the effects of increased development on Auckland's tūpuna maunga to achieve a well-functioning urban environment.

Information Used

Name of document, report, plan	How did it inform the development of the plan change
Report titled s.32 Landscape Report on the National Policy Statement on Urban Development & the Housing Enabling Act (Stephen Brown) – see Appendix A	The concerns and recommendations made in this report led to the additional building and earthworks standards proposed in PC 78, which in turn have been carried through to PC 120
Plan Change 78 including the PC 78 s32	PC 78 addressed similar issues and has been used as one of the starting points for the MV / HSBA provisions in PC 120
0BSubmissions on PC 78, expert conferencing and Council decisions on the City Centre Zone and Metropolitan Centre Zone	Submissions received on PC 78 and the decisions on the City Centre Zone (which accepted all recommendations of the IHP) and the evidence submitted to the IHP on the Metropolitan Centre Zone have informed further amendments to the provisions as contained in PC 120
Landscape Report Review of Maunga Viewshafts: E06, E10, E16, E19, E20, K01, K02, O10, T08, W06, W13 & A13 September 2025 (Stephen Brown) – see Appendix E	This review has assisted in the evaluation of options – in particular Option 5.

Consultation summary

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

1. Time has not allowed for targeted consultation undertaken with community or stakeholders. However, as the proposed provisions are the same or similar to those proposed in PC 78, notice has been taken of the submissions that were made on that plan change. The limited consultation that has occurred with regard to PC 120 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

2. There has been limited consultation with local boards, the Tūpuna Maunga Authority and Mana whenua / iwi authorities – see the Māori Engagement Consultation Summary Report and **Appendix B.**

3. Internal (to Council) consultation has been undertaken with relevant subject matter experts.

Appendix A - Landscape Report NPS-UD (PC78)

b r o w n

S.32 LANDSCAPE REPORT
ON THE NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT & THE HOUSING ENABLING ACT

FOR AUCKLAND COUNCIL

Brown NZ Ltd
June 2022

Introduction

This addresses the 'landscape' implications of the National Policy Statement on Urban Development (NPSUD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendments Act 2021Act (RMAEHS). In particular, it addresses the issue of whether a range of outstanding natural features and landscapes, related viewshafts, (coastal) areas of high or outstanding natural character, and other high value landscapes within the Auckland Region should be identified as "Qualifying Matters", and thus exempt from intensification, under the NPSUD. Additionally, this report explores whether or not additional controls are necessary to manage the interface between areas subject to residential intensification and those areas captured by the National Policy Statement's "*Qualifying Matters*".

In July 2021 Auckland Council's **Planning Committee** passed a resolution that defined the areas that should be subject to intensification under Policy 3(d)the NPSUD. These 'walkable catchments' were identified as comprising areas:

a) *around 1200m from the city centre, subject to modifying factors such as topography and physical barriers such as motorways*

b) *around 800m from metropolitan centres, subject to modifying factors such as topography, the nature of existing land uses in the area, the availability of existing or planned public transport (eg. Westgate compared to Newmarket) and physical barriers such as motorways*

c) *around 800m from existing and planned Rapid Transit Network stops, subject to modifying factors such as topography, the nature of existing land uses in the area (eg. Swanson compared to Mount Eden) and physical barriers such as motorways.*

At the same time, the Planning Committee asked Council staff to identify "Qualifying Matters" under Policy 4 of the NPSUD that should either be exempt from its urban intensification directives or that might modify the NPS's implementation. Included among those matters in Attachment A to the Planning Committee's resolution were:

Matters of National Importance:

- *D10 Outstanding Natural Features and Outstanding Natural Landscapes*
- *D11 Outstanding Natural Character and High Natural Character*
- *D12 Waitakere Ranges Heritage Area*
- *D14 Volcanic Viewshafts and Height Sensitive Areas*
- *Areas within Precincts that protect matters of national importance*

As a result, this s.32 assessment addresses the degree to which urban intensification under the NPSUD and the RMAEHS could or should be managed to comply with sections 6(a) and (b) of the Resource Management Act. More specifically, Brown NZ Ltd has been asked to address the following key matters:

1. The degree to which the NPSUD and RMAEHS might impact on visual links and associations between Auckland's Central City area (extending to Parnell and the margins of Ponsonby, St Marys Bay and Herne Bay) and the Waitemata Harbour, and to suggest a strategy for management of urban intensification that would maintain those connections as far as is practicable.

2. Whether Auckland's Volcanic Viewshafts and Height Sensitive Areas around individual maunga should be identified as Qualifying Matters, and if so, how the margins of those viewshafts and areas should be managed in relation to areas subject to intensification. In a related vein, this area of investigation extends to the future 'built form' of an intensified Central Auckland under different height control scenarios and how compatible that would be with the goal of maintaining the cone's visual primacy across, and near, the Auckland Isthmus.

3. Whether those Outstanding Natural Features on Auckland City's margins should be identified as Qualifying Matters, and if so, how areas of intensification (under both the NPSUD and RMAEHS) on the margins of those ONLs and ONFs should be managed to protect their intrinsic character, values and overall integrity.

4. Whether the Region's areas of High and Outstanding Natural Character within the Coastal Environment should also be identified as Qualifying Matters, and if so, how areas of intensification (under both the NPSUD and RMAEHS) near such areas should be managed to avoid adverse effects on those that are outstanding, while avoiding, ameliorating or mitigating 'significant' adverse effects on all 'other' coastal areas – in conformity with Policy 13(1) of the NZ Coastal Policy Statement.

1. Auckland City's Connections With the Waitemata Harbour

Part 1 of this report is accompanied by the following Attachments:

Attachments 1-4: Google Earth images addressing SH1's visual connections with the Waitemata Harbour from motorway connections that feed the 'central city'

Attachments 5-28: Google Earth images addressing the existing connections between Auckland CBD and the Waitemata Harbour

Attachments 29-32: Google Earth images of buildings and development that either hinder, or help to maintain, connectivity between 'central Auckland' and the Waitemata Harbour

Attachment 33: Map summarising the identified connections between different parts of the 'central city' and Waitemata Harbour

1.1 Current Views To & Connectivity With The Waitemata Harbour

These Attachments help to explain the current connectivity between the central city and the Waitemata Harbour, which is not only one of Auckland's key physical features, but also its visual, aesthetic and spiritual centrepiece. Historically, it was long the main link between an emerging Aotearoa New Zealand and the outside World, and it remains a critically important gateway to Auckland. This functional connection has resulted in large parts of the waterfront being dominated by port activities and structures that have isolated large parts of Auckland's CBD and much of its public waterfront from the harbour; yet over recent decades there has been a steady move towards actively engaging with the Waitemata and celebrating its central role for a quintessentially maritime city.

As such, the visual connections between the city and harbour have importance that transcends the purely 'scenic': they are fundamental to Auckland's heritage, identity, sense of place in the World and well-being. Yet they are also subject to development and many – including some key links, such as those from the Newmarket Viaduct (**Attachment 1**) – have already been lost already or significantly compromised.

Unfortunately, my evaluation of the road network within the CBD and its margins, further indicates that there is a general scarcity of connections with the harbour other than within and near its immediate margins – with the exception of a small number of relatively isolated streets. **Attachment 33** summarises those connections and highlights the following:

1. The critical importance of the Quay Street / Te Wero Island / North Wharf axis to engagement between the CBD and the Waitemata Harbour.

2. The related importance of the Viaduct Harbour and Westhaven Marina / St Marys Bay as extensions of the main body of the harbour that reach south of this 'waterfront axis'.

3. The significance of a number of key road axes that offer an important sense of connection with the harbour throughout the CBD, including: Nelson, Hobson and Albert Streets (CBD). Even so, most of the views down these road corridors are quite constrained, providing a limited, to poor, level of connectivity with the harbour.

4. The similarly constrained nature of most other connections, which are typically quite sporadic, fragmented. For the most part, they are either limited to around Westhaven Marina or near the port – on the central city's margins.

5. A general paucity of locations that offer more expansive and significant views of the harbour without being directly adjacent to it. Consequently, Waitemata Plaza is the only other location attributed a moderate level of connectivity, due to its proximity to the Viaduct Harbour and the way in which its steps down towards that body of water.

Even though the city centre retains a strong sense of being close to the Waitemata Harbour, such impressions rely very strongly on a limited number of road corridors and vistas down them – combined with views from private properties and buildings to reinforce such impressions. Closer to the actual harbour's edge, they are also reinforced by activities and the public domain around the waterfront axis (described above), together with the Viaduct Harbour, Westhaven Marina and a growing sequence of publicly accessible wharves.

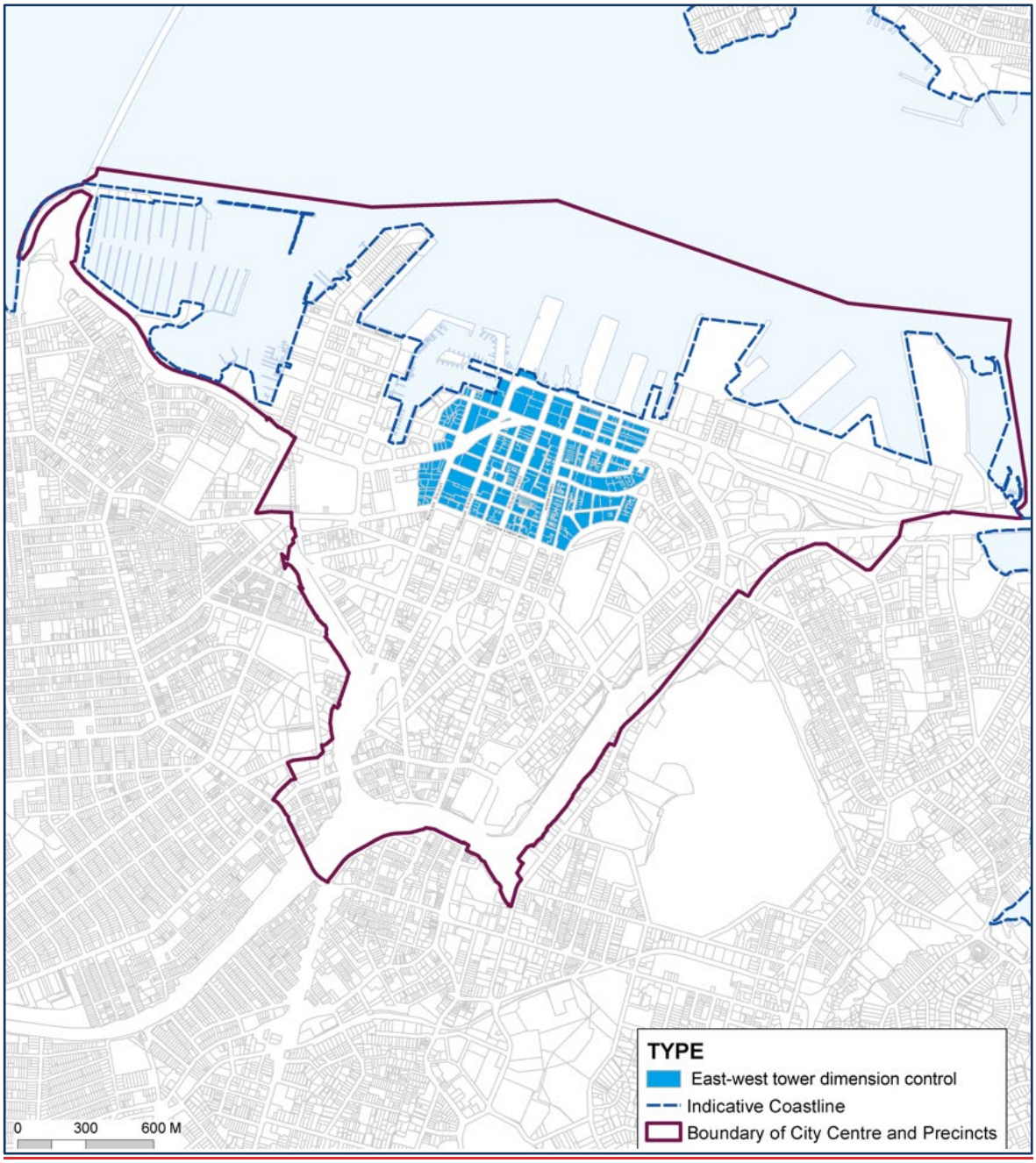
To summarise, therefore:

(a) The waterfront margins of the Viaduct Harbour, North Wharf and Wynyard Point, together with Westhaven Marina, generally comprise an area of high or elevated contact with the Waitemata Harbour and its margins. This area that is lined by public promenades / walkways and cycleways that are inside the first 'tier of waterfront buildings (relative to the harbour), that also have a more human scale – directly flanked by residential buildings 5-7 storeys high, and that are also linked to the city itself by laneways and open spaces in addition to streets.

(b) Most of Auckland's CBD waterfront could be regarded as an area that has a moderate level of access to the Waitemata Harbour. This area is largely separated from the actual harbour by the Port of Auckland and development on the likes of Princes and Queens Wharves.

(c) The rest of central Auckland, including the majority of its fringe suburbs, enjoy little or no direct connection with the harbour, but have a generally low level of perceived connection derived from some key street 'viewshafts'.

(d) Some isolated parts of Herne Bay / St Marys Bay, Grafton and Parnell are sporadically more connected with the harbour than the central city in general, but these areas are typically quite small and are often isolated.



1.2 The Definition Of Existing Harbour 'Viewshafts'

As is apparent from **Attachments 5-32**, the main limitations on existing views from the CBD's grid to the Waitemata Harbour comprise:

- Viewing distance;
- The topography around and in front of vantage points within the road corridor;

- Existing buildings and pedestrian canopies near ground level;
- Street trees – notably down parts of Hobson and Nelson Streets;
- Intervening vehicles;
- Port buildings, structures and containers; and
- Other buildings near the 'waterfront axis' and harbour edge.

This is apparent in relation to all of Auckland's central city streets, with a mixture of street canopies (lower Hobson Street), building podiums and verandahs largely defining the street corridors and related viewshafts. Traffic using these streets also frequently restricts views down them, although is more dynamic and continually changing, while the underlying terrain (and vertical angle of view relative to the harbour) and alignment of Auckland's road grid preclude many central city streets from having views of the harbour at all. As a result, views to it are, by and large, confined to a relatively small number of key public streets that are aligned from south to north (directly towards it) and that also fall towards it.

Moreover, most such views comprise little more than glimpses that are 'strung together' down some of the key thoroughfares shown in **Attachment 33**. This helps to create an impression of more continuous and significant contact with the Waitemata Harbour, even if individual views / glimpses are quite small scale. These connections are particularly important in relation to Auckland's CBD, as well as down Parnell Road and, to a lesser degree, Grafton Road.

1.3 Private Views & Connection

This analysis necessarily focuses on public views towards the Waitemata Harbour. Yet, it is important to note (as indicated in Section 1.1) that many residents living within the areas addressed in this report benefit from private views that traverse a wide range of views and outlooks – from those that are wide-open and panoramic to small slivers between adjoining buildings and vegetation. In addition, many of Auckland City's apartment dwellers and CBD office workers experience views that benefit from their elevation, although such views again remain highly variable in terms of their extent and significance. Even so, such engagement still helps to forge and maintain a critical sense of connection between the central city's occupants and the harbour.

While this wealth of views and outlooks is quite simply too wide-ranging and diverse to address in this report, it is nevertheless clear that such connections are – like the public views already described – subject to a range of constraints and impediments that increasingly include other high-rise buildings. Indeed, the evolution of apartment buildings within central Auckland since the early to mid 1990s has been accompanied by an increasing clamour for waterfront locations and elevation so as to maximise contact with the nearby harbour. Until now, a 'first come, best dressed' mentality has largely prevailed in this regard, with development near the waterfront increasingly inhibiting access to the harbour from other buildings behind this 'dress circle'. Over time, this has the potential to significantly impair

broader community engagement with the Waitemata Harbour, particularly if new intensive development 'swallows up' the harbour edge.

In this regard, both good and bad examples of existing development are already apparent. No.1 Queen Street and Travelodge-cum-M Social have long been criticised as slab-sided developments that impede interaction between the CBD and harbour, while Scenes One to Three, the Hotel Grand Chancellor at the bottom of Hobson Street, and even the Air New Zealand Building and Vodafone Building on Fanshawe Street (**Attachments 29 & 30**) emphasise the containment of key road corridors running from east to west, 'against the grain' of the city grid and key vistas that are described in Sections 1.1 and 1.2 above. They contribute to the blockage of visual connections between the CBD and its waterfront and harbour. Unfortunately, this pattern of transverse or lateral development was recently augmented by Port of Auckland's location of a car storage building within its custom bonded area at the base of Bledisloe Wharf – contributing to yet further separation of the public waterfront from the nearby harbour (**Attachment 30**, lower right photo).

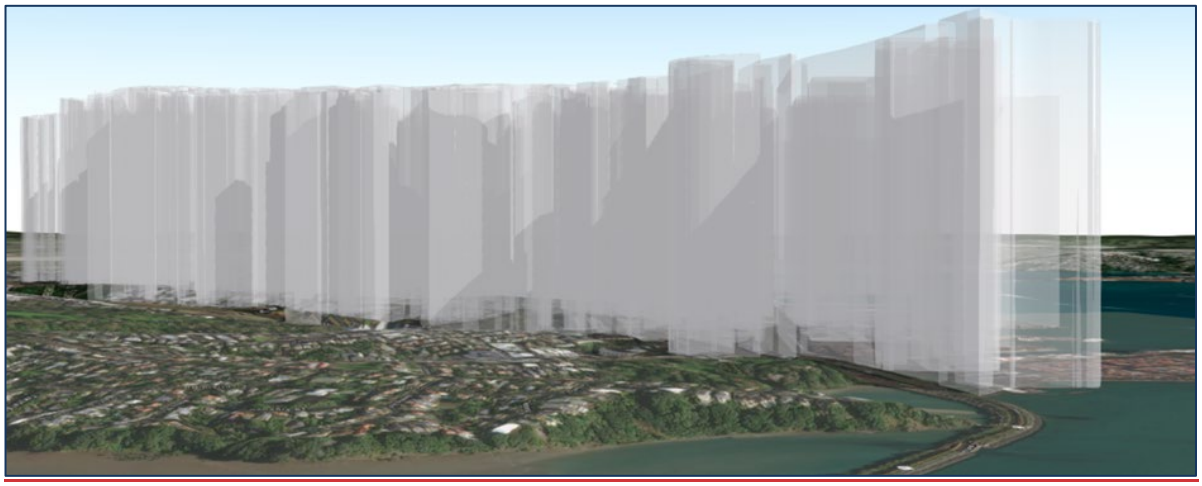
This pattern of development contrasts other recent developments, ranging from the four separate, but linked, commercial buildings of 10-16 Viaduct Harbour Avenue to the Dockside Lane complex near Quay and Tapora Streets, the 57-storey high, Pacifica building on Commerce Street – within its narrow north-south aligned footprint – and the similarly oriented, Wynyard Central and 30 Madden Street apartment complexes in the Wynyard Precinct (**Attachments 31 & 32**). These developments have quite different built form qualities to Scenes One, Two and Three and buildings of their ilk. In particular, they display qualities that include:

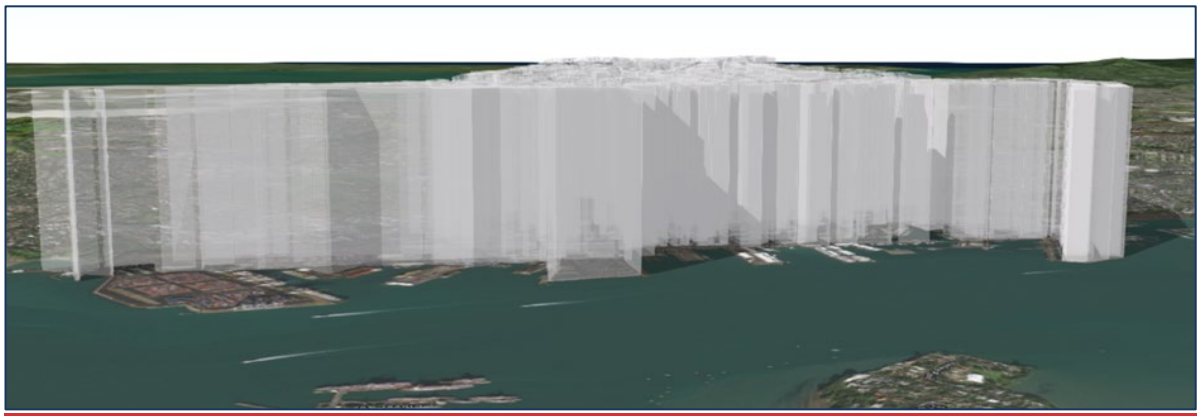
- Smaller, quite compact individual building footprints;
- Either a square or north-south alignment;
- Spaces around and between them running towards and away from the harbour;
- Opening out towards the harbour; and
- A stronger diversity.

They contribute to a city skyline that is already notable for its crenelated (up and down) profile, yet still promote the feeling of opening out towards the waterfront and key thoroughfares leading towards it. As a result, they also enhance the city centre's permeability within the harbour's margins, both at ground level and – of significance in relation to the private views discussed above – within the air space near those margins: they don't create the sort of elevated 'walls' associated with Scenes One and Two, No.1 Queen Street, or even the more grounded 'blocks' along parts of the northern side of Fanshawe Street.

1.4 Recommendations

Despite the limited nature of many city views to the Waitemata Harbour, it – together with other key features like Rangitoto, North Head and Mt Victoria – remains a key touchstone of Auckland's identity and sense of place. The visual connections that do remain are critical in this regard. Consequently, it is my opinion that the city views identified are a 'qualifying matter' under the NPSUD and that maintaining the relationship between Auckland's central city and the Waitemata Harbour is fundamentally incompatible with unfettered development, of the kind shown below.





At the same time, development within the central city needs to be managed so that the integrity of the Waitemata Harbour, together with that of Auckland's volcanic maunga field, is also maintained – in views back from the harbour and across it. Without such management, the section 6(b) values of the maunga cannot be protected and significant adverse effects on the natural character values of the harbour cannot be avoided – as is required by Policy 13 of the NZCPS and section 6(a) of the RMA..

On the basis of this analysis, it is my opinion, that a move towards more permeable, north-south aligned, development within the CBD should be supported. In this regard, the height of future buildings is less of a concern than their bulk and projection towards, or even into, the air space above the CBD's main road corridors. Nelson Street, Hobson Street, and Albert Street are especially important in this respect.

Height alone is not a major issue at present, although an excessive concentration of tall buildings near the waterfront has the potential to cumulatively block the rest of the central city off from the harbour over time. Imagined like the banked seating within a stadium or arena, it is conceivable therefore that development closest to the harbour – the 'front row seats' – could eventually capture the majority, if not all, of the views to the harbour. This would leave development behind them (both apartments and commercial buildings) with little more than some viewshaft 'scraps' and the rear of other buildings to look at. On the other hand, a sloping height control, angled back from the harbour's edge, would conceivably allow more buildings and apartments behind the 'front row' to have visual access to the harbour.

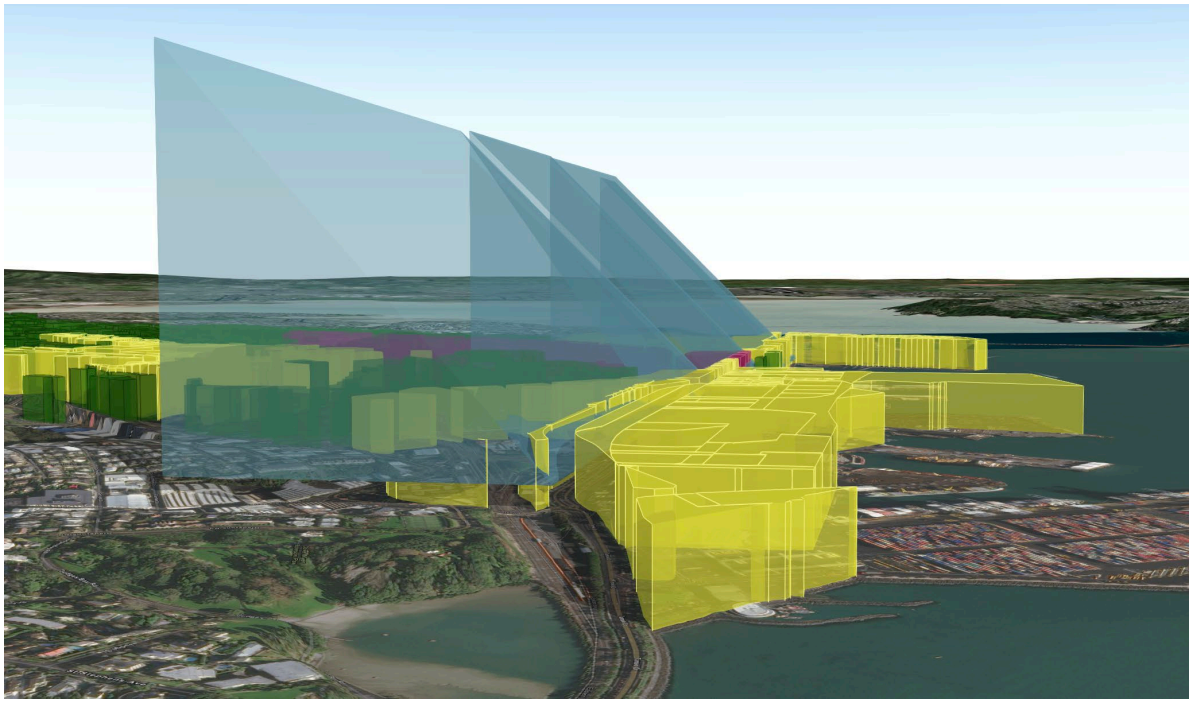
Exploring both of these issues, Auckland Council has worked with Architectus to model different recession planes and development footprint scenarios for the central City and its margins. The following analyses address those scenarios.

Waterfront Harbour Edge (Set-back) Control:

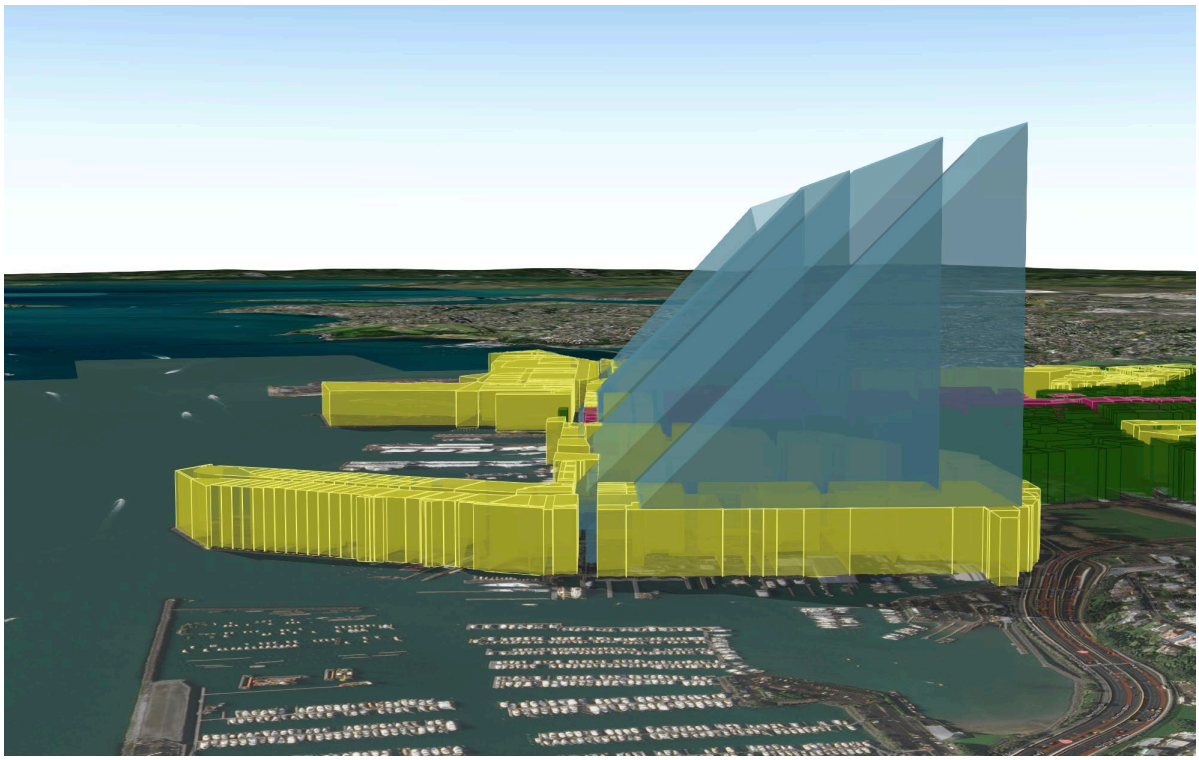
Use of a sloping height control or controls to manage building height near Auckland's waterfront has the potential to maximise the metaphorical 'rows of seating' within both apartment towers and commercial buildings that remain connected to the Waitemata Harbour in the long term. To test the application of such a control, two Harbour Edge Set-back options have been modelled to date (shown overleaf):

- A 45 degree set-back slope starting40m above the centreline of Quay Street; and
- A 60 degree set-back slope starting 40m above the centreline of Quay Street.

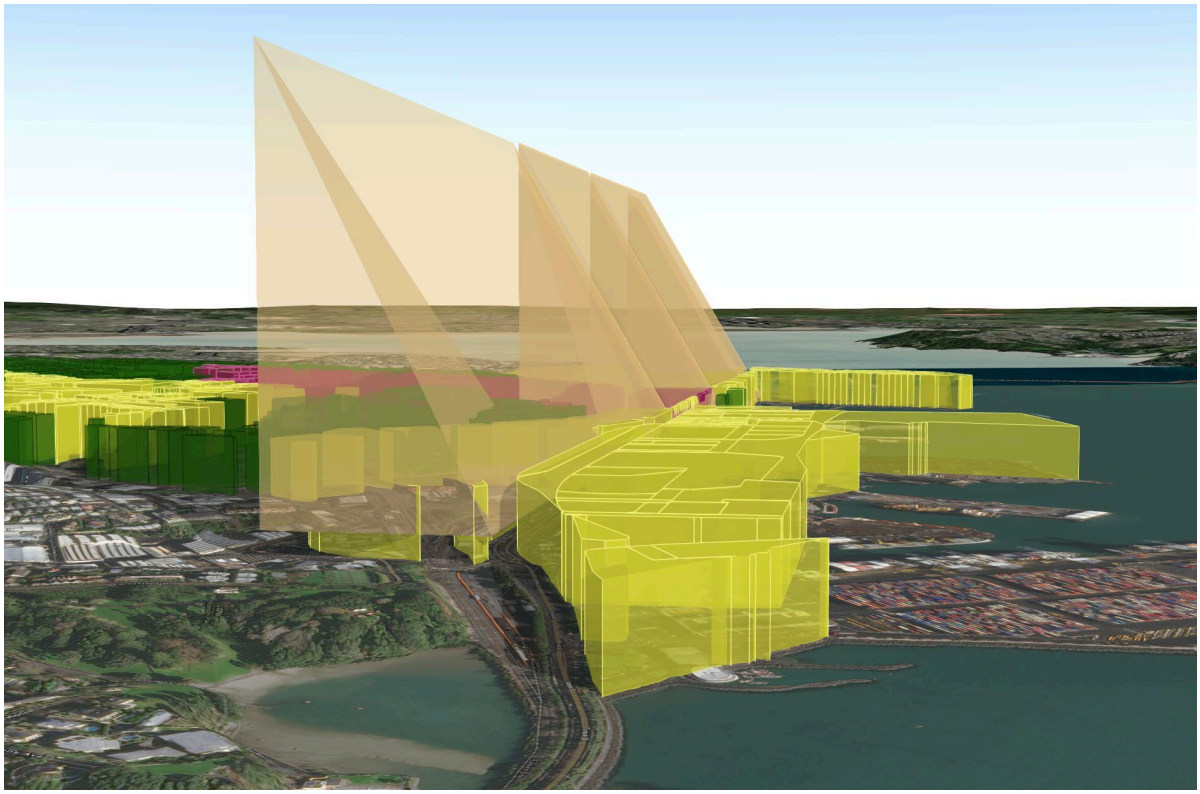
The main beneficiaries of both set-backs would be those living and working in those CBD towers that climb above approximately 12 storeys, and many of these would be among Auckland's wealthier city residents. Regardless, greater benefit would be derived for the wider residential and working populations of the central city with adoption of the shallower 30^{o} plus 40 degree set-back control, as the sort of stepped, 'grandstand' views discussed above would be spread more widely among the central city's population. Whereas the 30m plus 60^{o} control could create a 'full height wall' of tower development starting near a line that corresponds with Pakenham Street, Swanson Street and Shortland Street, the 30m plus 45^{o} control would push the 'amphitheatre' more directly overlooking the Waitemata Harbour back to near Fanshawe Street, Kingston Street (between Swanson and Victoria Streets), and the northern end of Albert Park.



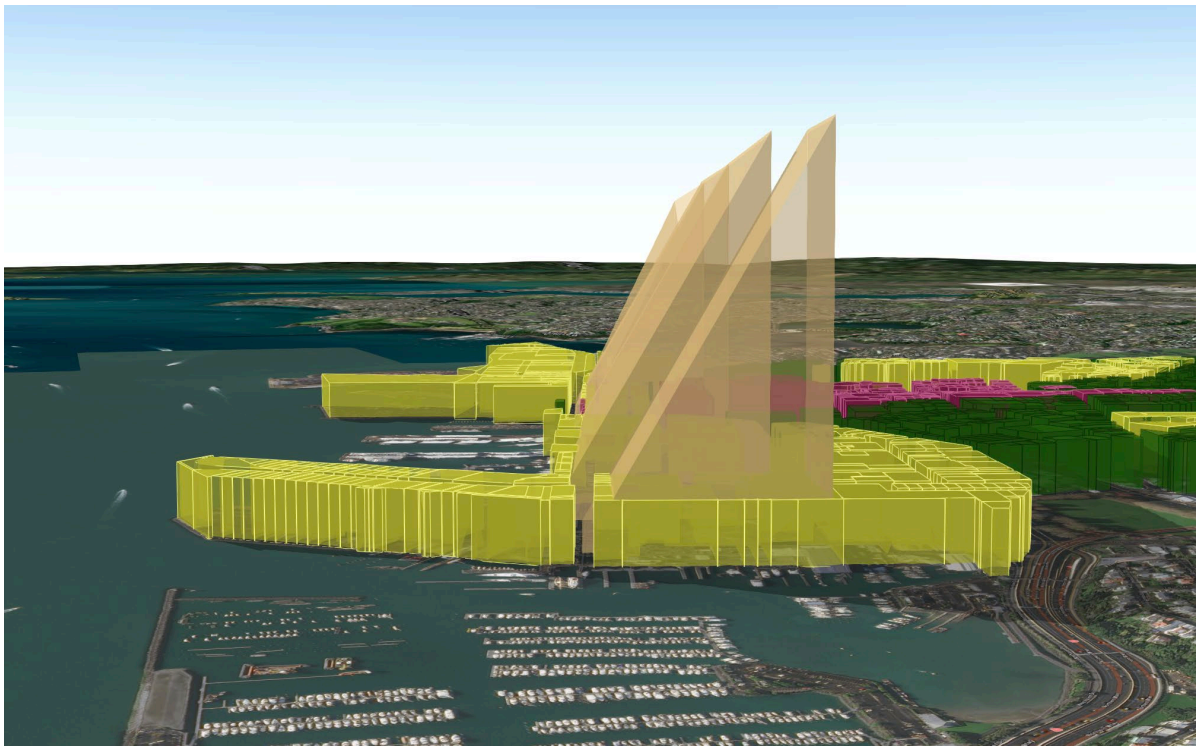
Screenshot of the modelled 40m + 45º Waterfront Harbour Edge Control – viewed from east of the CBD



Screenshot of the modelled 40m + 45º Waterfront Harbour Edge Control – viewed from west of the CBD



Screenshot of the modelled 40m + 60º Waterfront Harbour Edge Control – viewed from east of the CBD



Screenshot of the modelled the 40m + 60º Waterfront Harbour Edge Control – viewed from west of the CBD

In addition to this modelling, more recent trialling has also been undertaken of a 72m + 45º Waterfront Harbour Edge Control.

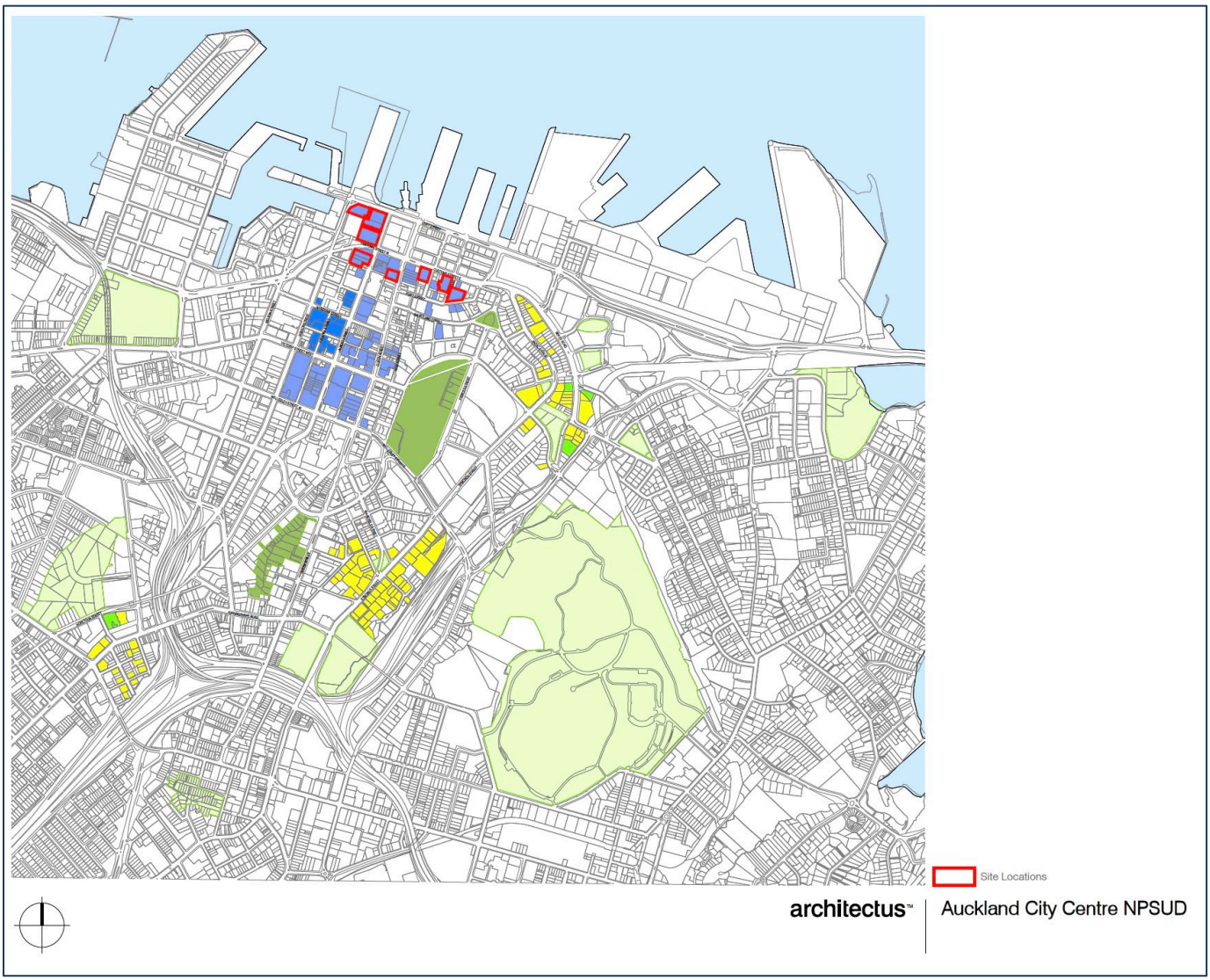
On the basis of this analysis, the 40m plus 45° Waterfront Harbour Edge Control is strongly supported, as It would greatly expand the number of city residents and workers alike who eventually have 'front row seats' in relation to harbour views. In addition, this control would help to maintain both views and glimpses of the harbour from towers that are located behind the front tier of waterfront development. It would also help to maintain scale that is more sympathetic to some of the historic buildings found on and near Auckland's waterfront and the human activities long that edge.

At the other end of the control spectrum, the 72m + 45° option would create a 'cliff face' along the southern edge of Quay Street, greatly reducing the perception of permeability and of integration with the Waitemata Harbour at this key interface. Although the 45° control above that 'cliff face' would help to increase the number of high level tower occupants who have relatively clear views to the harbour in the future, this would be more than off-set by those who lose views closer to ground level because of the higher starting point for the 45° recession plane. As a result, this option is problematic in relation to public use of the waterfront, integration of the CBD with the harbour and the maximisation of views from the CBD's future matrix of towers to the Waitemata Harbour.

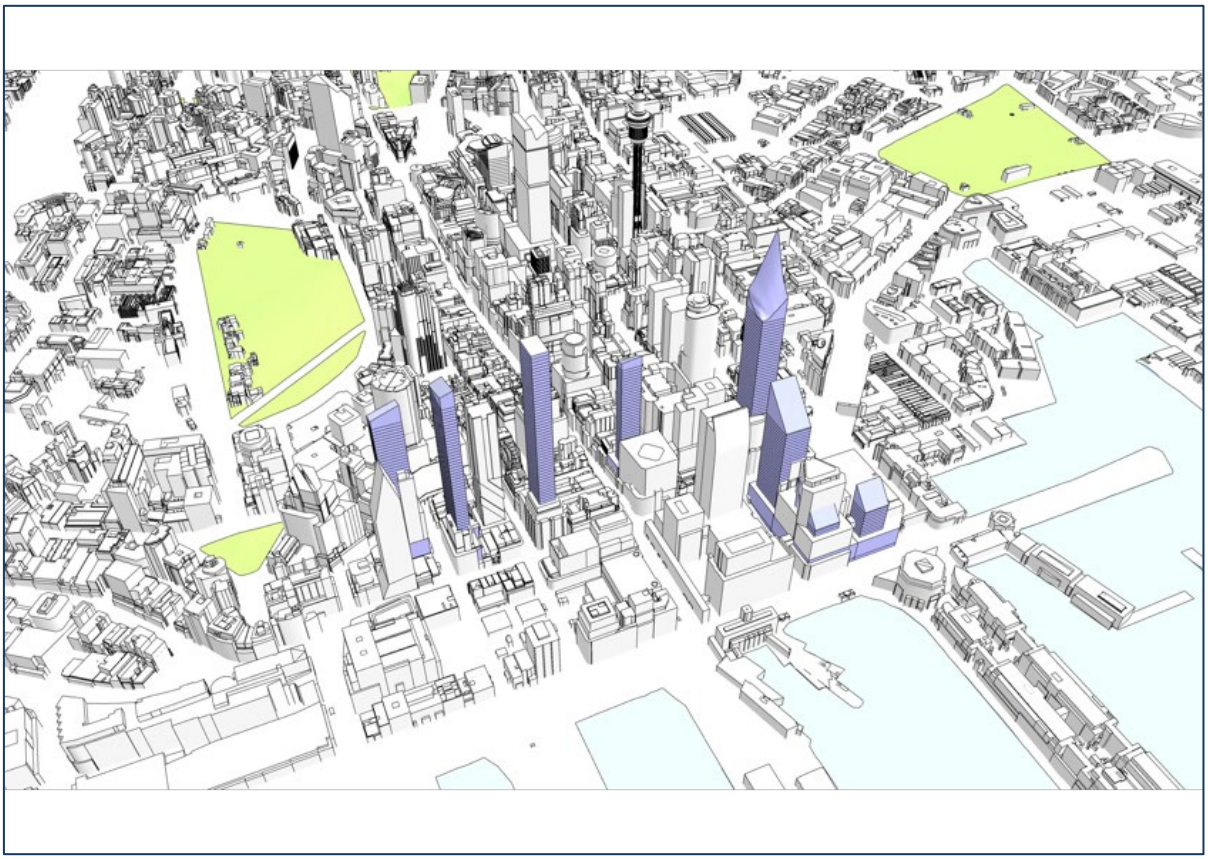
The option of applying similar or the same controls to other parts of the city waterfront – for example, around Wynyard Precinct – has also been considered. However, this would adversely impact on the permeability of the city periphery and, just as important, the future form of the central city – which is addressed in Section 2.3 of this report. Taking into account the findings and recommendations of that section and the desirability of maintaining or even enhancing city fringe connections with the harbour, it is considered preferable to employ a Harbour Edge Control (like those described above) along the CBD waterfront together with separate precinct controls over height, rather than managing all of these central city areas in the same way. That alternatively would greatly expand the potential area of very intensive, CBD-like, development, but would also result in greater imposition on the characteristics and values of the harbour and – looking more broadly – Auckland's volcanic cone field.

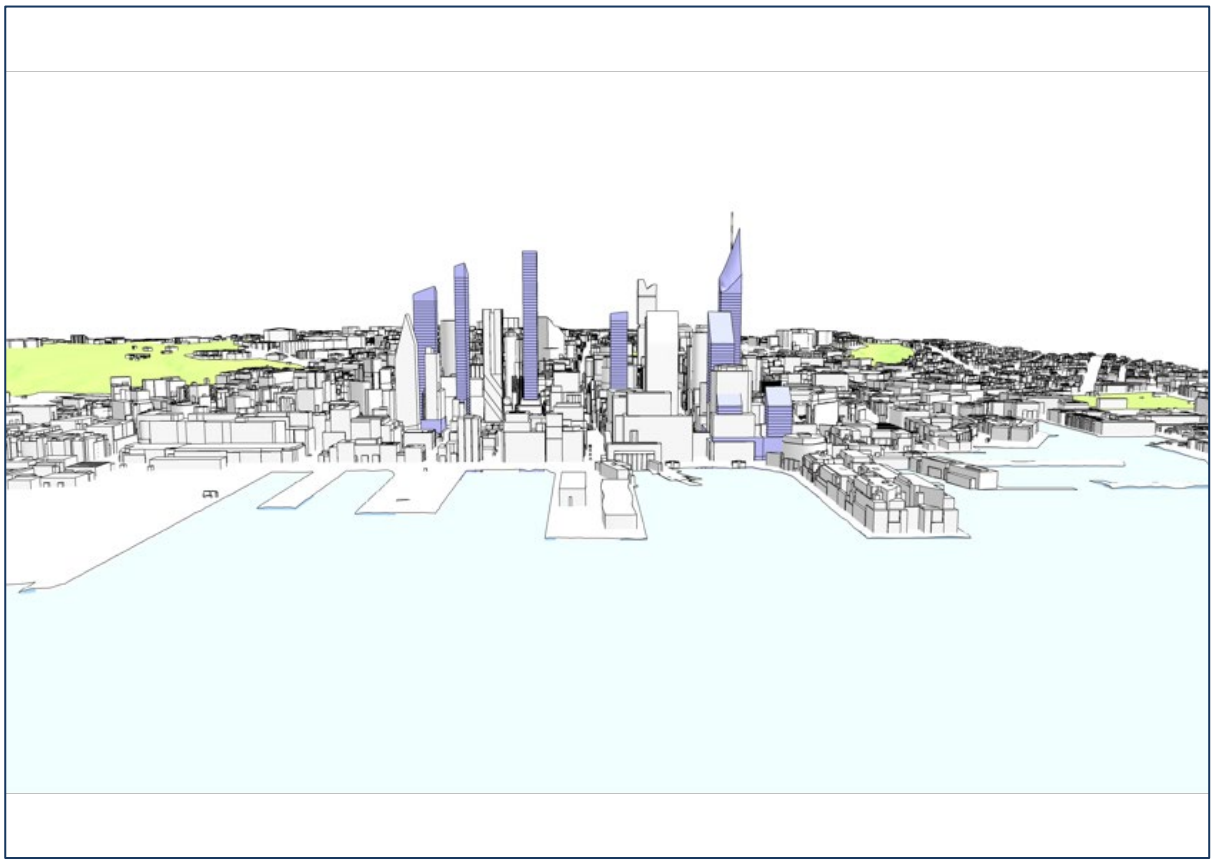
<u>CBD Building Footprint Controls</u>:

As discussed above, a 'tower and podium' approach to development within Auckland's CBD, together with an emphasis on stretching out the north-south orientation of future towers and minimising their east-west expansion has been posited as one way of maximising the visual permeability of Auckland's future central city. This would also help to maximise views of the Waitemata Harbour for city residents and works, and enhance, or at least maintain, as much connection as possible with the harbour and many of the emblematic features associated with it, including Mt Victoria / Takarunga, North Head / Maungauika and Rangitoto. To test this, Architectus had modelled a development control which generally limits tower footprints to 30m form east to west – as shown overleaf.



Architectus's Modelled Site Locations With a 30m limit on the East-West Dimension of Tower Development





Conceptual towers located on the trial sites subject to the 30m control on their east-west footprint

As can be seen from the lower image in particular (looking towards the CBD from Te Waitemata), the proposed control over tower development would create a much more permeable and fine-grained development matrix that increases the viewing depth into the city from the Waitemata Harbour. In turn, this would optimise the number of future towers spread throughout the CBD that would retain view or glimpses of the harbour and features associated with it. This would help to maintain the 'signature' role of the harbour in relation to the CBD's identity and sense of place.

The approach trialled also reveals a marked contrast with the slab-sided, east-west aligned blocs of existing development near Quay Street that are such a hindrance to such connectivity already.

There are, however, limits to the likely effectiveness of this mechanism. At and near ground level, the sort of controls discussed above would be much less meaningful, as the existing perimeter block development and street trees lining most of the key CBD streets depicted in **Attachment 33** limits the potential to pull future development back from those margins and open out the current ground-level 'viewshafts'. Furthermore, as one moves inland, away from the harbour, the central city's terrain transitions away from slopes that fall more directly towards the harbour into the flatter ridge crests under Nelson and Hobson Streets on one side of the CBD, and Symonds Street on the other. Away from the harbour, it also descends into the Queen Street 'canyon' and down the outer flanks of those same ridges. In addition, a point must be reached where the sort of permeability described above is curtailed by the sheer number of towers developed within the central city.

In response to these issues, a number of points have been identified where the city's natural topography transitions from being oriented strongly towards the harbour to either sliding off the sides of the Nelson St / Hobson St and Symonds Street ridges or losing contact with the harbour as each ridgeline flattens out. As a result, the following limits are recommended for the area that would be subject to the sort of controls described above:

- North: Quay Street
- South: Victoria Street West & Victoria Street East;
- West: Victoria Park
- East: Symonds Street

Much of this area is not identified as being important in terms of their ground level / street connections with the Waitemata Harbour. Even so, it remains important in relation to future apartment buildings and commercial development that should ideally retain a strong sense of connection with the harbour and features beyond it. As a result, it is strongly recommended that the sort of 30m footprint control trialled by Architectus should be further evaluated and fine-tuned for potential application to the catchment identified.

Other Measures:

In addition to these key measures, it is recommended that Auckland Council adopts related measures that include:

- Accommodating perimeter block development, street trees and other street furniture at street level and close to it, but stepping back from that edge at higher levels to maximise permeability and the 'sharing of sea / harbour views' above the street level – as discussed above. This strategy would not greatly enhance or benefit ground level / street views of the harbour, but would help to 'share' views of it more widely among the CBD's existing and future high rise towers.

- Maximising the number of secondary laneways and viewshafts close to the harbour edge and waterfront – generally north of Shortland Street.

- Ensuring that future development within the current Port of Auckland part of the waterfront follows these orientation principles – unlike the recently developed car storage building.

2. Volcanic Viewshafts & Height Sensitive Areas

The AUP describes the importance of Auckland's maunga as follows at the start of Chapter B.4:

> *The maunga of the Auckland volcanic field are a significant part of Auckland's natural identity and character. The relationship of Mana Whenua to the maunga is very important to their culture and traditions. Significant views to and between the maunga of Auckland from a range of publicly accessible locations are accordingly of great value to Auckland's identity and the quality of the environment and should be protected.*
>
> *The long-protected view from the Auckland War Memorial Museum on Pukekawa towards the harbour is an example of a regionally significant public view that should also be protected. Views from public places to the coastal environment, ridgelines and other landscapes also contribute to a sense of identity and are valued by local communities. A selection of these views are also worthy of protection from inappropriate subdivision, use and development.*

This introductory description is then followed by the following provisions that implement s.6(b) of the RMA as Outstanding Natural Features within and around the Auckland Isthmus – both as physical entities in their own right and as features that remain connected to greater Auckland by a series of Volcanic Viewshafts and Height Sensitive Areas first identified by the (then) Auckland Regional Authority in 1976:

> ***B4.3. Viewshafts B4.3.1. Objectives***
>
> *(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.*
>
> *(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.*
>
> ***B4.3.2. Policies***
>
> *(1) Identify and evaluate a view to or between maunga for its regional or local significance considering the following factors:*
>
> *(a) the viewpoint conveys the view to an audience from a public viewpoint that is regionally or locally significant;*
>
> *(b) the view conveys an intact view of the maunga within a wider context which is of high or good quality;*
>
> *(c) the view will contribute to or reinforce an overall appreciation of the region's maunga;*
>
> *(d) the view recognises the importance of the maunga to Mana Whenua;*

(e) *the extent to which there are other public views of and between the maunga; ……...*

(3) *Protect significant views to and between maunga by:*

(a) *avoiding subdivision, use and development that would:*

(i) *result in significant modification or destruction of view; or*

(ii) *significantly detract from the values of the view; and*

(b) *avoiding where practicable, and otherwise remedying or mitigating, adverse effects of subdivision, use and development that would: (i) result in the modification of the view; or*

(ii) *detract from the values of the view.*

(4) *Protect the visual character, identity and form of maunga by:*

(a) *identifying height sensitive areas around the base of maunga; and*

(b) *establishing height limits in such areas which control future development that could encroach into views and erode their significance.*

In order to maintain the visual characteristics, values and – to a certain extent – primacy of Auckland's maunga as ONFs, the original Volcanic Viewshafts were subject to extensive review in 1996, 2001-3, 2013, and again in the course of the AUP hearings process in 2015 and 2016. During 2012 and 2013 the originally conceived Height Sensitive Areas were also reviewed.

2.1 Auckland's Volcanic Viewshafts

In 1996, the ARC commissioned LA4 (which I was then a director of) to re-evaluate the viewshafts, Looking to the possibility of amending and deleting some (then) existing viewshafts, but also adding new ones. That work involved a thorough review of both the existing viewshafts (identified in 1976 by Roy Turner) and exploration of potential new viewshafts. In particular, there was a growing realisation that the island maunga could not rely on their water surrounds alone for long term protection. That process resulted in a wide-ranging series of recommendations, covering:

- New viewshafts: especially those to Rangitoto and Browns Island, most of which were subsequently incorporated in Change 8 to the Auckland Regional Policy Statement, then PM339;
- Modification of existing viewshafts: in response to changes in their surrounding environs – again largely adopted in Change 8 and PM339; and
- Deletion of a number of viewshafts: for a variety of reasons – which was not generally supported at the political level, with many of these recommendations not carried through to Change 8, although some have since been adopted as part of PM339.

Importantly, the LA4 report broached the issue of criteria for the identification of viewshafts at two levels. At pages 6-10 of the LA4 report it initially focused on the significance of the individual cones, before – in turn – addressing the significance of potential viewpoints / origin points and their sense of connection with Auckland's cones, both individually and cumulatively. Re-evaluation of the (then) existing viewshafts, together with new viewshaft 'candidates', led to a number of recommended deletions and amendments.

From 2001-3, a further review of the viewshafts was undertaken, with staff from Auckland City, Manukau City and North Shore City participating in that process, notably George Farrant. I was again involved in that process. It concentrated on two key issues:

- Whether or not individual maunga were considered to be 'regionally significant'? and
- Whether or not individual views to them were also 'regionally significant', ie. supporting the regional community's connection and associations with the ONF / maunga.

These core issues were explored using criteria largely drawn from LA4's 1996/7 reports (p.6):

> *"…… Cones that are the subject of viewing and therefore of sightlines should first of all 'be a significant part of the Auckland scene'. This requires that they have sufficient character to leave a clear impression upon viewers' minds, and that they are large enough to command attention from some distance, or that their location makes them a natural focus of attention. They should be recognisable as cones and should not just appear to be prominent ridgelines or similar.*
>
> *This review has revealed that the cones identified in the 1976 study as those "whose visual protection depends on building height controls" can be subdivided into two groups of cones meriting protection of sightlines and one group whose sightlines do not merit protection."*

In addition, each viewpoint was assessed in terms of values associated with the individual vantage point and the way in which it's revealed the individual cone (pages 9-11 of the LA4 report):

> "*This review proposes that the significance of each view be re-assessed not only in relation to the significance of each cone, but also to the significance of the viewpoint, and to the ease with which viewers can see the cone from the viewpoint.*
>
> *Furthermore, in certain views the value of the whole scene is greater than the sum of the parts: while North Head or Mt. Victoria taken in isolation may have only sub-regional significance, where they are seen together with Rangitoto and the sparkling waters of the Hauraki Gulf the significance of the view is lifted.*
>
> *Each viewpoint - the origin point for each sightline - should convey the view to an audience that is regional in nature. This means that each viewpoint should either be a thoroughfare or a congregation point for a significant part of the regional community. Such points include main roads and intersections, and major recreational/ cultural venues. There is a case to include secondary schools, hospitals and regional shopping*

centres. However, local roads, the corner block of shops and local community halls do not meet this requirement.

The vast majority of the viewpoints are on city roads. ……. views from State Highways have national significance; those from Urban Routes are regionally significant; while those from local streets may have regional significance but are more usually only of local importance. ……

Each viewpoint and its surroundings needs to be reasonably conducive to creating a good impression of the cone in view; which is not to imply that contrast with a built foreground or middle ground is inappropriate, nor that the element of time and the potential for change in any given scene should be ignored. But the other components of a view should not be visually degraded to the extent that they significantly affect perception of the cone.

In the case of viewpoints from roads, it is preferable if the sightline is not off-set too greatly from the main axis of the road corridor, as drivers' attention is unlikely to wander too greatly from the road channel and a very large proportion of trips involve drivers by themselves. However, a number of factors can mitigate this:

- *the visual prominence of a cone, eg. Mangere Mountain from the Onehunga bridge on State Highway 20;*
- *the passenger's perspective - which must be taken into account, along with that of visitors to the city who may well be coach passengers; and*
- *the influence of foreground elements in a view which can lure the eye towards a cone that provides an important backdrop, such as the views south over Hobson Bay and east over the Tamaki estuary.*

As travellers are moving along most roads at some speed, their vehicles move some distance while they perceive the views. Hence if a view is to register on the viewers' consciousness, it needs to be seen from a viewing window, rather than as a snap-shot from one static position. For this reason, it is necessary to extend the viewpoints of sightlines that are at an angle to the direction of travel for some distance along the roadways."

The last point made above had important repercussions for the recommendations in relation to individual viewshafts, giving rise to an increase in the number of linear viewshafts 'stretched out' along key viewing corridors (eg. along parts of Tamaki Drive relative to views of Mount Hobson and Rangitoto), not just the static, single-location, origin points that predominated in the 1976 report.

In addition, considerable emphasis was placed on the degree to which each viewshaft – present or proposed – would accommodate a 'reasonable level of use' within private properties close to the origin point. This was not a criterion that pertained to the values of the view on offer, or the significance of the vantage point being considered, but it was generally agreed that two residential storeys (9m) of development should be accommodated under individual viewshafts. In some case, this led to viewshafts having slightly tilted or stepped

'base plates', and this resulted in amendments to many viewshafts that sought to avoid or work around a (then) Permitted Baseline level of development on affected properties.

Putting this preliminary matter to one side, the following factors dictated the identification of the 'regionally significant' viewshafts (below & overleaf):

1. Significance of the Individual Maunga:
▪ Physical stature: elevation, scale, profile ▪ Intactness: topography, vegetation cover, land use cover / elements ▪ Social Value & Status: reserves / art / literature ▪ Cultural / Tangata Whenua Values: pa sites / remnants / commemorative elements
2. Cumulative Values:
▪ Visual connection with other volcanic cones (of similar or higher significance): Mt Eden, Mt Wellington, One Tree Hill, Mt Hobson, Mt St John, Mt Albert, Mt Roskill, Mangere Mountain ▪ Visual Connection with other volcanic features of the Auckland Isthmus: Hobson Bay, Orakei Basin
3. Significance of Origin Point:
▪ Road Hierarchy: Strategic Routes (nationally important) / Regional Arterial Route (regionally important) ▪ Areas of Public Congregation: parks & reserves / open spaces / beaches / promenades / sports fields / walkways & cycleways / commercial centres / community centres
4. Visual Interaction /Engagement:
▪ Orientation of View ▪ Elevation / Slope / Aspect ▪ Proximity to Cone ▪ Clarity of Expression & Demarcation of Cone Relative To Surrounding Terrain / Development (including visual 'breathing space' around the cone) ▪ Visual Catchment Relative To Other Origin Points (Uniqueness / Representativeness) ▪ 'Gateway' Values (introduction to Isthmus cone field)

The resolution of the appeals to ARPS Plan Change 8 (Volcanic Cones) in 2010 resulted in the addition of 35 viewshafts to those addressed in 2001-3 and the deletion of 7 (then) existing viewshafts in the ARPS. Other resurveyed viewshafts were also relocated or shifted. This review was followed by yet further assessment of the Volcanic Viewshafts in 2013,

focusing on 11 that appeared to struggle to meet the criteria outlined above because of changes to the environments around them.

Then, in the course of the IHP hearings, further evaluation of the 87 Volcanic Viewshafts in existence at that time was undertaken in response to matters raised by submitters to the (then) draft PAUP. This review involved even more detailed analysis of the values associated with both individual viewshafts and individual maunga, giving rise to the viewshaft 'summary sheets' that I prepared in 2015 and 2016 that are now found in the AUP's Schedule 20. Examples of that assessment are shown overleaf.

It is noteworthy that the factors employed in those summary sheets (and précised above) were agreed as being appropriate by all of the landscape experts representing the Council and submitters involved in the IHP process. The Joint Statement covering this agreement agreed was signed by the experts (including myself) for Topic 020 – Volcanic Viewshafts on the 5th of May 2015.

VIEWSHAFT E10: NORTHERN MOTORWAY (SH1) TO MT EDEN / MANGAWHAU

SIGNIFICANCE OF THE CONE:	
• ***Physical stature*** • ***Intactness*** • ***Social Value & Status*** • ***Cultural / Tangata Whenua Values***	Mt Eden / Maungawhau is perhaps THE archetypal Isthmus cone: although not always especially prominent or physically imposing, its location close to Auckland's CBD and juxtaposition with it – in views such as E10 – highlights the dramatic interplay between natural processes and forces on the Auckland Isthmus and the dynamic urban environment that is evolving notwithstanding this active volcanic heritage. Indeed, it might be argued that the frisson of danger implicit in the presence of the cones is an important part of Auckland's identity and 'soul'. The cone is also strongly linked to parts of the Waitemata Harbour, and is exposed to the Southern, Northern and North-western Motorways. For those arriving via the Waitemata Harbour, Mt Eden affords an introduction to the wider isthmus cone field, and its close juxtaposition with both the War Memorial Museum and Auckland CBD highlights the present-day interplay of natural and man-made features that remains such a key feature of Auckland's landscape signature. The cone's crater reinforces its volcanic origins and significance as a stand-alone entity, while its visual linkage to other key Isthmus cones – Mt Hobson, One Tree Hill, Mt Albert, Mt Roskill, Mt Wellington and even Mt St John and the Big King – reinforces the cone's status as a key lynch-pin in Auckland's volcanic field. Its distinctive terracing further reflects its cultural / historical significance as a former pa site for the Waiohua tribe – until the early 1700s – that once dominated much of the central Isthmus.

CUMULATIVE VALUES:	
• ***Visual connection with other volcanic cones*** • ***Visual Connection with other volcanic features***	The cone makes a 'stand alone' statement in views from this quarter and origin point / line. However, during the course of the Northern Motorway's approach to the harbour bridge and Waitemata Harbour, it is viewed after Mt Victoria – which comes into view near the Barrys Point Rd interchange – and vehicle passengers can also crane their necks around to see Rangitoto beyond the Bayswater / Belmont / Devonport isthmus. Even so, Mt Eden enjoys a quite limited degree of interplay with other volcanic features – as whole – and is more directly associated with the Waitemata Harbour in views from this vantage area and direction.
SIGNIFICANCE OF THE ORIGIN POINT:	
• ***Transport Corridors*** • ***Areas of Public Congregation*** • ***Nature of the Viewing Audience***	The Northern Motorway is identified by Auckland Transport as a Strategic Route, and with the origin 'point' located on part of SH1 occupies part of New Zealand's premier transport corridor. It is, in fact, THE key entryway to central Auckland with the section of motorway leading up to the harbour bridge providing a very powerful introduction to the Waitemata Harbour, CBD and wider Isthmus. Indeed, it captures among the most important and impressive images of Auckland that locals and tourists / visitors alike are exposed to within the Region. As a result, this origin point is critically important in terms of public perceptions of Auckland, impacting on an enormous audience of commuters, daily motorway / bridge users and tourism traffic.
VISUAL PRESENCE / LEGIBILITY:	
• ***Orientation of View*** • ***Elevation / Slope / Aspect*** • ***Proximity to Cone*** • ***Clarity of Expression & Demarcation of Cone*** • ***Visual Catchment Relative To Other Origin Points*** • ***'Gateway' Values***	Critically, views from this quarter place Mt Eden at the epicentre of this view, between Sky Tower and the harbour bridge, and at the culmination of the city / CBD matrix – on its skyline. Lying slightly to the left of the harbour bridge and motorway alignment, Mt Eden is less than 'commanding', with its flat-topped profile mirroring that of the development at its foot. Yet, the juxtaposition of its green, volcanic, slopes with the patina of buildings stepping down from the Karangahape Rd, Symonds St and Jervois Rd ridges towards the Waitemata Harbour is clearly apparent. Indeed, the 'window' between and through development on the first two ridges mentioned above makes this juxtaposition 'work': it parts the 'sea' of development around Mt Eden so that it retains enough visual presence and sufficient clarity of expression to make a statement in its own right. In particular, it highlights both the resilience of the cones and their importance as iconic symbols of a uniquely volcanic metropolis. Additionally, Mt Eden combines with the broad expanse of the Waitemata Harbour, in the foreground, to highlight both the way in which Auckland has been historically structured and shaped by its array of natural features, and the enduring influence that they continue to exert over the form and fabric of Auckland as its continues to grow. The E10 viewshaft is therefore a critically important symbol of Auckland's past and future: its iconic profile reminds us that Auckland has been subject to formative processes that are far more powerful than human-kind, but it is also symbolic of a cultural heritage – and importance to iwi – that is critically important in terms of Auckland's wider signature.
RATING:	**Regionally (and Nationally) Significant**

VIEWSHAFT T01: THE AUCKLAND WAR MEMORIAL MUSEUM STEPS TO RANGITOTO

SIGNIFICANCE OF THE CONE:

- ***Physical stature***
- ***Intactness***
- ***Social Value & Status***
- ***Cultural / Tangata Whenua Values***

The "Rangitoto Island Historic Conservation Trust" website describes Rangitoto as:

> "*Rangitoto Island is a volcanic island in the Hauraki Gulf near Auckland, New Zealand. It is an iconic landmark of Auckland as its distinctive symmetrical 260 metre (850 feet) high shield volcano cone is visible from much of the city. It is the most recent and the largest (2311 hectares) of the approximately 48 volcanoes of the Auckland Volcanic Field.*"

This description, if anything, underplays the significance of Rangitoto: it is a truly unique volcanic feature that marks the interface between Auckland City and the Hauraki Gulf. It provides the sea gateway to Auckland and is a truly remarkable visual focal-point for views from many parts of the City. Its clinker-like fields of lava and massed pohutukawa are redolent of a natural past and processes that can only be glimpsed at in relation to Auckland's other, physically modified, cones, while its sense of splendid isolation at the junction of the inner Hauraki Gulf and Waitemata Harbour lends Rangitoto a visual presence and majesty quite unlike that of Auckland's other remnant volcanic features.

The Māori name for Rangitoto is 'Bloody Sky', and comes from the phrase Nga Rangi-i-totongia-a Tama-te-kapua ('The days of the bleeding of Tama-te-kapua'). Which relates to Tama-te-kapua – the captain of the Arawa waka – who was wounded on the island in battle with the Tainui iwi at Islington Bay.

CUMULATIVE VALUES:	
• ***Visual connection with other volcanic cones*** • ***Visual Connection with other volcanic features***	Although Rangitoto stands largely apart from the rest of the Auckland cone field (albeit physically connected to the non-volcanic Motutapu Island), T01 reveals it partly overlapped – visually – by the much smaller, highly modified volcano of North Head / Maungauika, which marks the entrance to the main body of the Waitemata Harbour facing central Auckland. Its sentinel like presence commands attention in its own right, but T01 places North Head in a position where its 'volcanic plug'-like profile, remnant fortifications and Defence / DoC buildings, together with walking tracks and open slopes, contrast very markedly with a heavily vegetated Rangitoto. Further to the left, Mt Victoria / Takarunga is also visible from the western end of The Cenotaph – rising above the commercial centre and residential surrounds of Devonport – so that a sequence of cones is apparent from the general vicinity of T01. They reinforce the geological progression of cones across the Auckland landscape and provide points of reference on the horizon that – together with the Waitemata Harbour – affirm the way in which natural elements still structure, and in places, dominate the Auckland landscape.
SIGNIFICANCE OF THE ORIGIN POINT:	
• ***Transport Corridors*** • ***Areas of Public Congregation*** • ***Nature of the Viewing Audience***	The Auckland Domain is one of Auckland Council's 'premier parks'; in fact, it is almost certainly Auckland's premier park (singular) while the Auckland War Memorial Museum is undoubtedly Auckland's single most important architectural and heritage attraction – for locals and tourists / visitors alike. This importance is exacerbated by the presence of The Cenotaph and consecrated ground around it at the foot of the museum steps. Each ANZAC day, it is the focus for the annual commemorations of those killed in past wars, but it remains a place of reverence and significance throughout the year. Symbolically, therefore, the area around TO1's origin point is conceivably the single most important location in Auckland, while the high levels of use by both the regional community and visitors means that it is also highly important in terms of Auckland's identity and presentation to the rest of the World.
VISUAL PRESENCE / LEGIBILITY:	
• ***Orientation of View*** • ***Elevation / Slope / Aspect*** • ***Proximity to Cone*** • ***Clarity of Expression & Demarcation of Cone*** • ***Visual Catchment Relative To Other Origin Points*** • ***'Gateway' Values***	Pohutukawas and other trees flanking the museum and cenotaph frequently obstruct views to much of the Waitemata Harbour and encroach into the view towards both North Head and Rangitoto. Furthermore, Rangitoto lies well to the right of the main viewing axis from the museum steps. Even so, the highly distinctive profile of Rangitoto – interwoven with that of North Head and the waters of the Waitemata Harbour – draws the eye of those leaving the museum or standing in front of it. North Head and Rangitoto are both clearly legible, and even though the view from the museum is (unlike those from most other origin points) slightly downwards, they still have commanding presence on the northern horizon. Rangitoto is particularly notable, as its largely unbroken swathe of dark khaki and rounded profile contrasts so very markedly with the geometry, angularity and colours found amid the development matrix otherwise visible across most of Devonport and among those CBD towers that rise above the Domain's margin of tree canopies. Of note, T01 goes beyond simply presenting Rangitoto as a visual focal point: it also forges an important link between Auckland's natural heritage and its cultural heritage by creating a sense of association between the island maunga and the War Memorial Museum – two of Auckland's most important features in quite different ways. Consequently, even though this viewshaft lacks some of the singular focus upon a cone that is apparent in other views, it remains critically important in terms of Auckland's sense of place.
RATING:	**Nationally / Regionally Significant**

In my opinion, the Volcanic Viewshafts listed in Schedule 20, and as shown on the AUP's mapping system, are critical to the regional community's appreciation of the maunga / ONFs. They contribute meaningfully, and in some cases powerfully, to Auckland's identity amid a volcanic field, and the City's natural heritage. Cumulatively, they also contribute to a metropolitan landscape that is truly unique, together with the values of the maunga as features and their integrity – both physical and visual. Such values also embrace Maori occupation and use of the maunga as pa and Auckland's historic heritage – from the stone dwellings and gardens once established by iwi on the Tamaki River side of Maungarei to Cornwall Park and the Logan Campbell Memorial associated with One Tree Hill / Maungakiekie.

In my opinion, this means that Auckland's maunga / ONFs are a Qualifying Matter under the NPSUD and that the Volcanic Viewshafts are critical to the protection of their values and integrity under sections 6(b), (e) and (f) of the RMA.

2.2 Height Sensitive Areas & Their Management

In 1976 areas were delineated around individual maunga that set out to protect local views to individual maunga from their surrounding local areas. The overriding objectives of this exercise, as originally undertaken, were two-fold:

- To maintain the connections and associations between individual maunga and the communities around them, thus contributing to the local amenity, identity and sense of place associated with those localities; and
- To cumulatively maintain the visual primacy of the maunga at the local level, as well as the regional level, thus enhancing the collective values of the maunga across the Isthmus and its margins.

In 2012 and 2013, LA4 undertook a review of the identified Height Sensitive Areas (HSAs) focusing on two issues (as set out in their report of the 18th of December 2012):

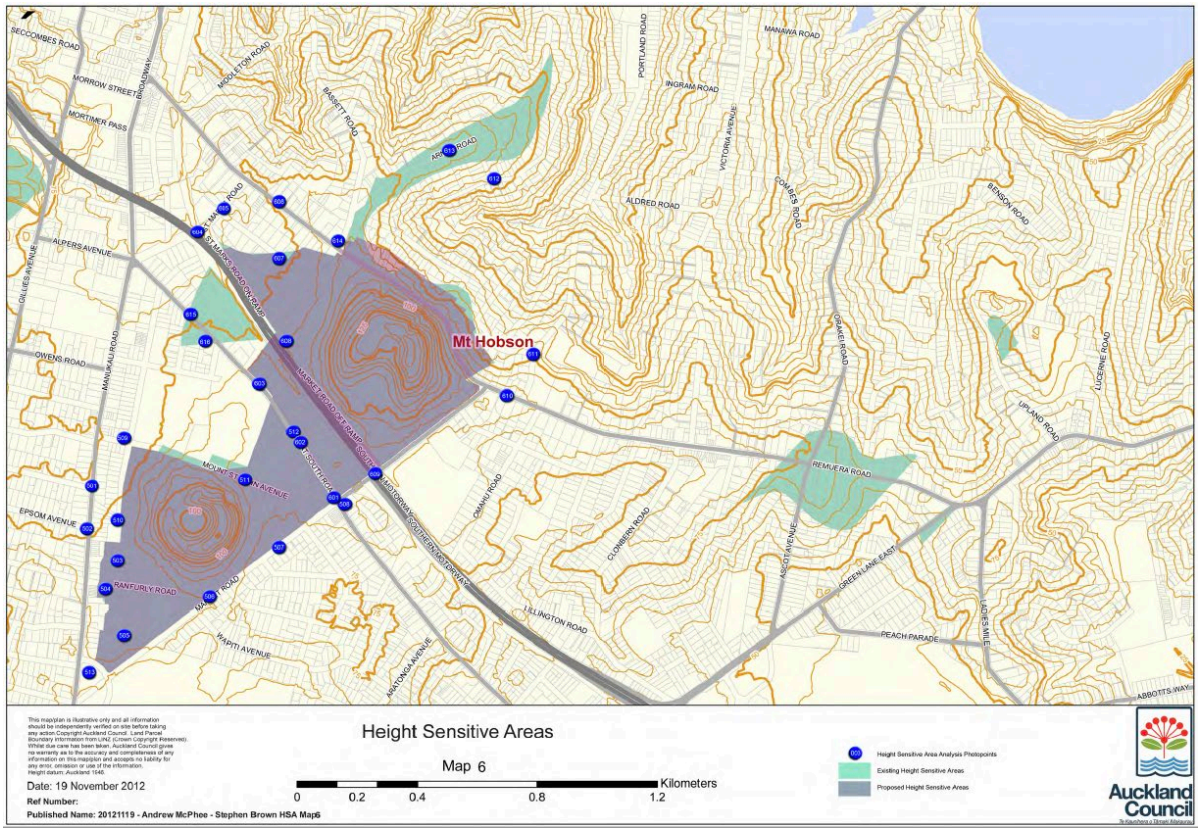
> *"**Retention of the array of relatively close-up views to each cone from its more immediate public surrounds**: These views and glimpses complement the longer distance, more strategic, regionally significant views captured by the Volcanic Viewshafts. Whereas those, very specific, views are identified one-by-one, the Blanket Height Sensitive Areas are delineated so as to protect a myriad of local views and glimpses – typically from locations well within 1.0km of each cone – that are important in terms of local catchments' identity and sense of place. The cones of the Auckland Volcanic field are critical to perception of the Auckland landscape, and the Height Sensitive Areas (with related controls) therefore set out to maintain individual community's sense of connection with, and attachment to, nearby cones by ensuring that they are not screened out by new development. In identifying areas / catchments within which such views are significant, the emphasis is therefore upon areas shared by the local community: roads, parks, reserves, village / commercial centres and places where recreational activities occur. No emphasis is, by contrast, placed on views from private locations, such as residential properties.*

Protection of each volcanic cone's profile and distinctive landform*: The cones retain value and make an important contribution to Auckland's landscape because they each have a profile that is fundamentally volcanic and cone-like. Development on, or too close to, each cone, or too large (both vertically and in terms of overall scale / mass) could well disrupt the iconic profiles associated with Auckland's volcanic field, as has happened in the past, eg with The Pines apartment development next to Mt Eden. Consequently, it is important that each Height Sensitive Area limits the scale of development so that the broad matrix of urban development on and around the apron of each cone broadly mimics / reflects the underlying topography of the individual cone. Each Height Sensitive Area should be sufficiently extensive that it maintains a continuity of built forms that, in turn, help to retain the distinctive volcanic profile of each cone and their differentiation from surrounding ridges and other landforms of lesser value."*

This assessment was undertaken for the following maunga:

- Mt Victoria / Takarunga & North Head / Maungauika
- Mt Albert / Owairaka
- Mt Roskill / Puketapapa
- The Big King / Te Tatua a Riukiuta
- Mt Eden / Maungawhau
- Mt St John / Te Kopuke
- Mt Hobson / Ohinerau
- One Tree Hill / Maungakiekie
- Mt Wellington / Maungarei
- Mangere Mountain
- Brown Island / Motukorea

That evaluation resulted in a series of maps that incorporated recommended changes to the HSAs for each maunga. For example, the map overleaf addressing Mount Hobson / Ōhinerau, shows areas of green where it was suggested that parts of the 1976 HSAs could be removed and purple areas where the HSAs (as then shown) should remain. Some 'pink areas were also identified where it was suggested that the HSAs should be extended.



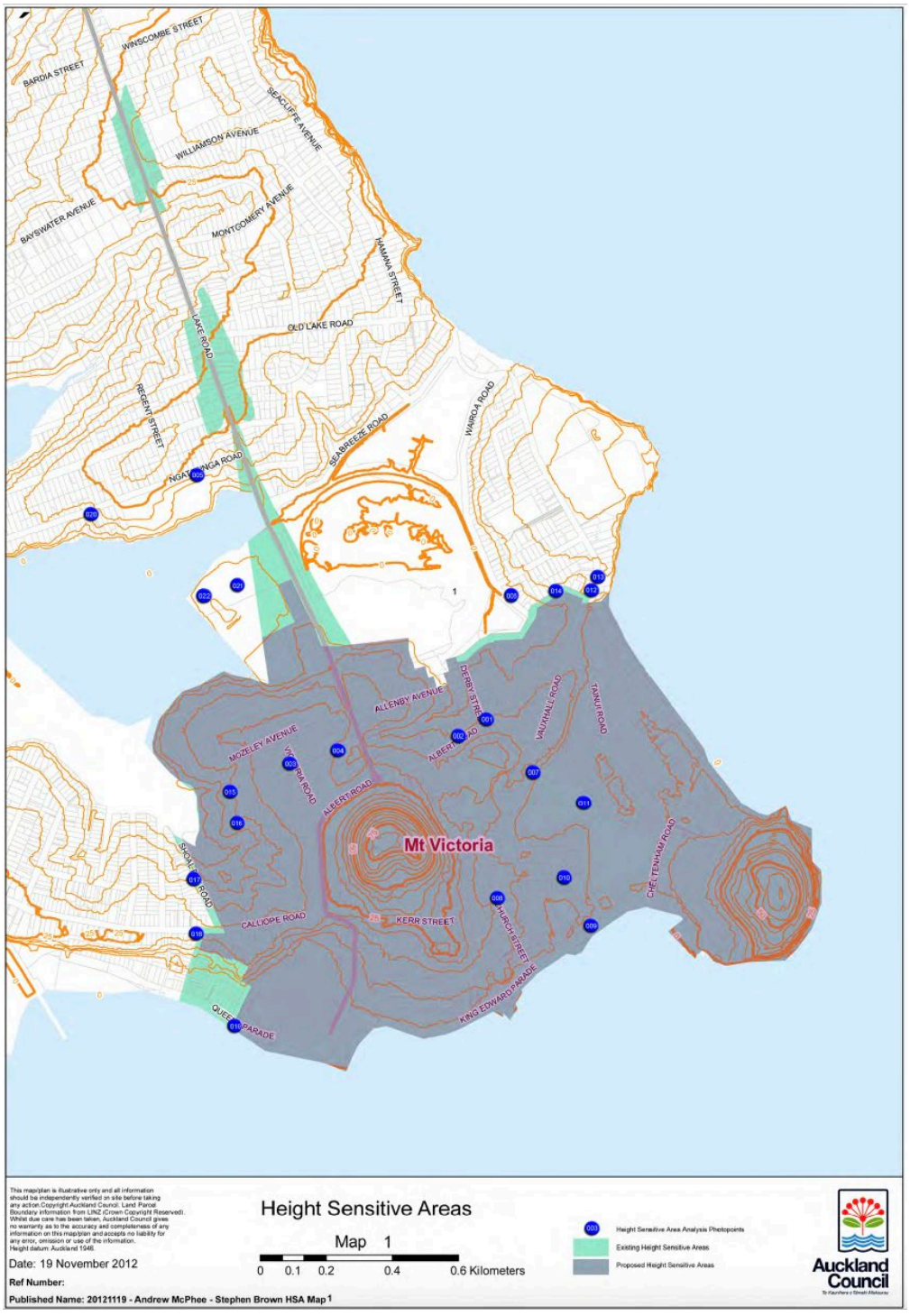
Mt Hobson Height Sensitive Area Map showing recommended changes to the 1976 HSA & photopoints

In the course of the IHP hearings, all of the HSAs were subject to yet further interrogation. Although this did not result in any significant changes to the mapping of the HSAs, it did result in the following statement being added to each set of HSA maps and photos – also now found in Schedule 20 – which addresses the process of evaluation:

> *"Each of Auckland's volcanic cones has been analysed and evaluated to determine:*
>
> - *Those parts of each cone / maunga and its surrounds that are considered to be critical to the retention of their volcanic cone / crater / feature profile – differentiating them from the terrain and other non-volcanic elements and features that surround them. These areas have been mapped.*
>
> - *Those areas around each cone that engage with it visually – via local views, both individually and cumulatively – and that derive an appreciable part of their character, identity and sense of place from this interaction. Photos have been included in this assessment that reflect such interaction, and the areas considered to directly benefit from it are mapped.*
>
> *Individual volcanoes / cones have different topography and profiles: some are more visually expressive and enjoy more presence in relation to Auckland's wider metropolitan area and community, whereas others are more subtle, with greater importance attached to local views and their role as a local feature and visual focal-point. In some instances, the nature of the surrounding terrain also strongly influences both the perception of cones' form and the extent of the area that is exposed to them. For example, the physically proximate nature of Mt Victoria / Takarunga and North Head*

/ Maungauika means that the visual interaction between these two cones, and public views of them as joint features, have been taken into account in looking at their volcanic 'profile'. These factors have been weighed up in determining the proposed boundaries for the Height Sensitive Areas (HSAs) proposed around individual cones. Consequently, this summary explains the key factors that have contributed to delineation of the proposed HSAs for all eleven cones assessed."

A typical HSA map covering the maunga of Mt Victoria / Takarunga, North Head / Maungauika and associated parts of Devonport is shown below, together with some of the photos taken from the local area.



VOLCANIC CONE BLANKET HEIGHT CONTROL PHOTOS
Mt Victoria & North head: Images 017 & 018

As with the Volcanic Viewshafts, it is my assessment that the HSAs remain integral to the protection of the values and visual integrity of Auckland's main maunga. In addition to maintaining the visual primacy of the maunga, both individually and cumulatively, the HSAs affirm the identity and sense of place of individual city localities, like Mt Eden, Mt Albert, Mt Wellington, Mangere, One Tree Hill and Devonport. They also serve to reinforce both the City's integration with the volcanic field that it sits on and its historic evolution during both pre-colonial times and since then. In my view, this mechanism remains critical to protecting the value of the maunga / ONFs under s.6(b), (e) and (f) of the RMA.

In addition to these matters of national importance, the maunga are integral to Auckland's identity and sense of place. They reflect the unique engagement of a geomorphological system with an increasingly large, cosmopolitan city. I therefore consider that Auckland's maunga / ONFs are a Qualifying Matter and that the HSAs are – like the Volcanic Viewshafts – critical to protection of their values and integrity.

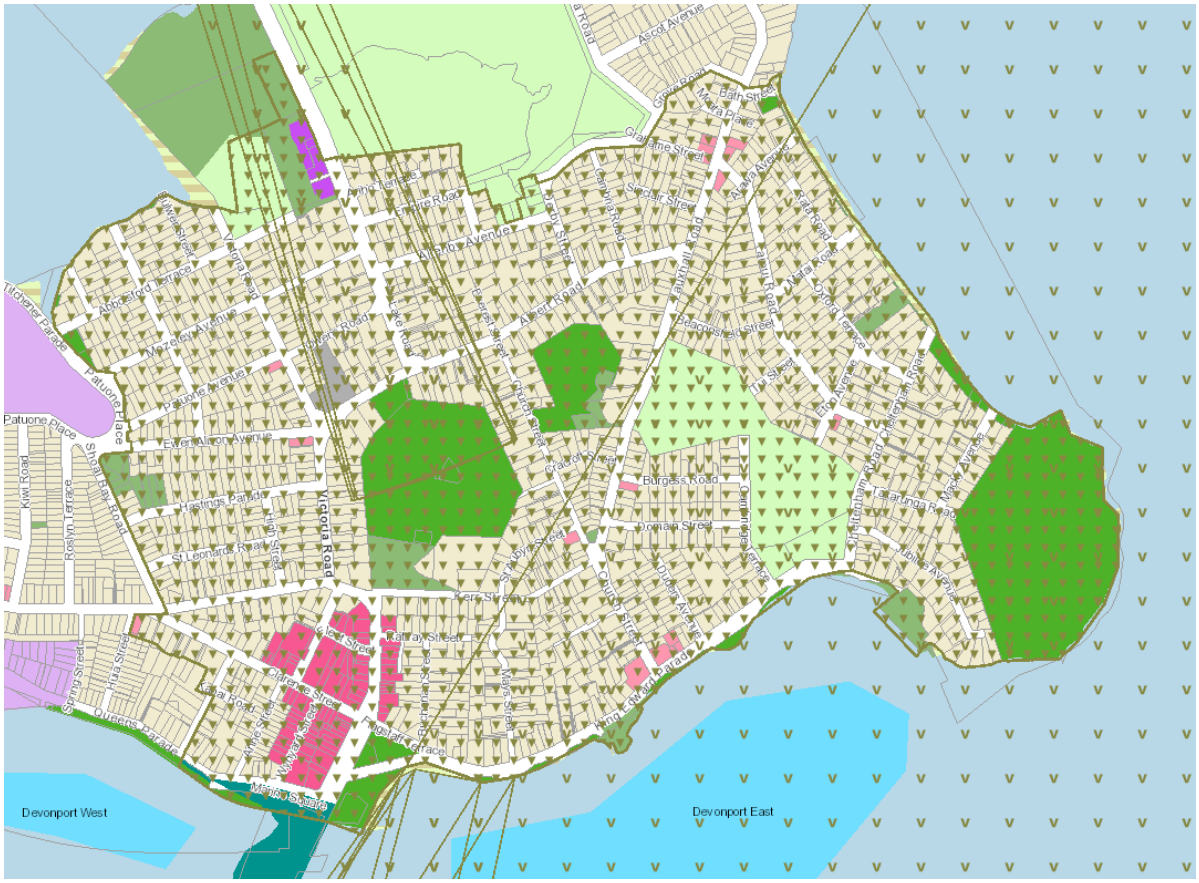
Turning to the key issue of how the HSAs should therefore be managed, it appears that there are two options in this regard:

- Introduction of a new lower density zone that specifically targets the Single House (SH) and Mixed Housing Suburban Zones (MHS) within each HSA so as to maintain the status quo within them. On one hand, this approach would make the rationale for control quite explicit – via the new zone's introductory statement, objectives and

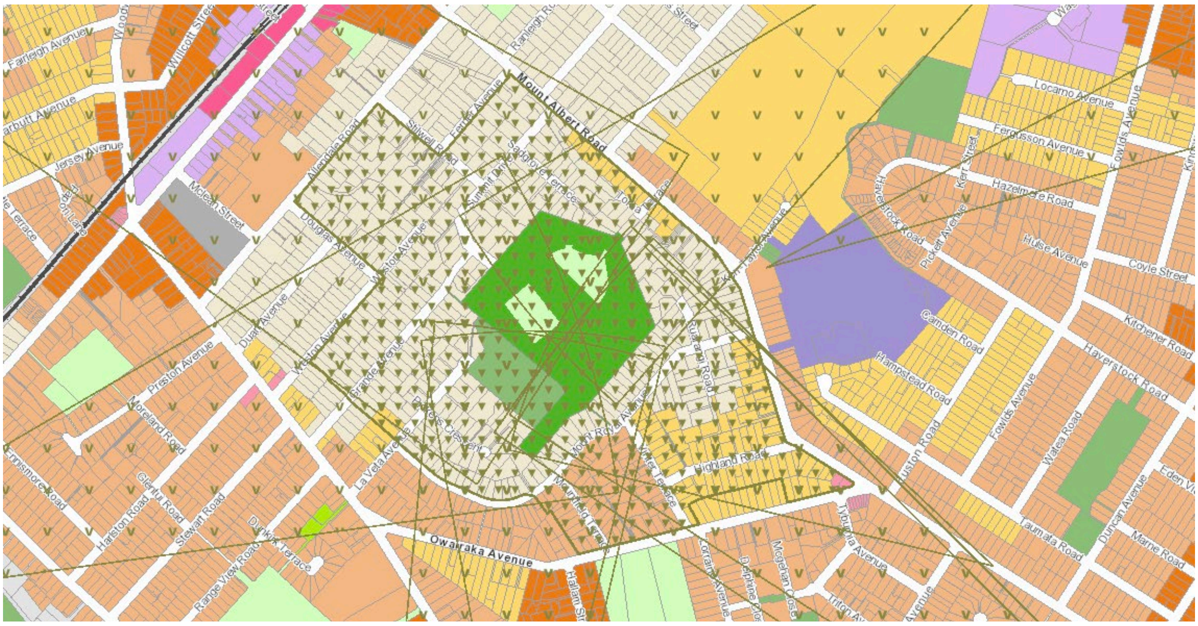
policies. However, it would not address existing Terrace Housing and Apartment Buildings (THAB) development found within some HSAs.

- Continued application of an overlay or overlays that limit the height and intensity of development across the underlying residential zones, so as to both retain views over that development and between the buildings within it. This approach would encompass all underlying residential zones, but could potentially cause conflict with the intent of the underlying zones' objectives and policies.

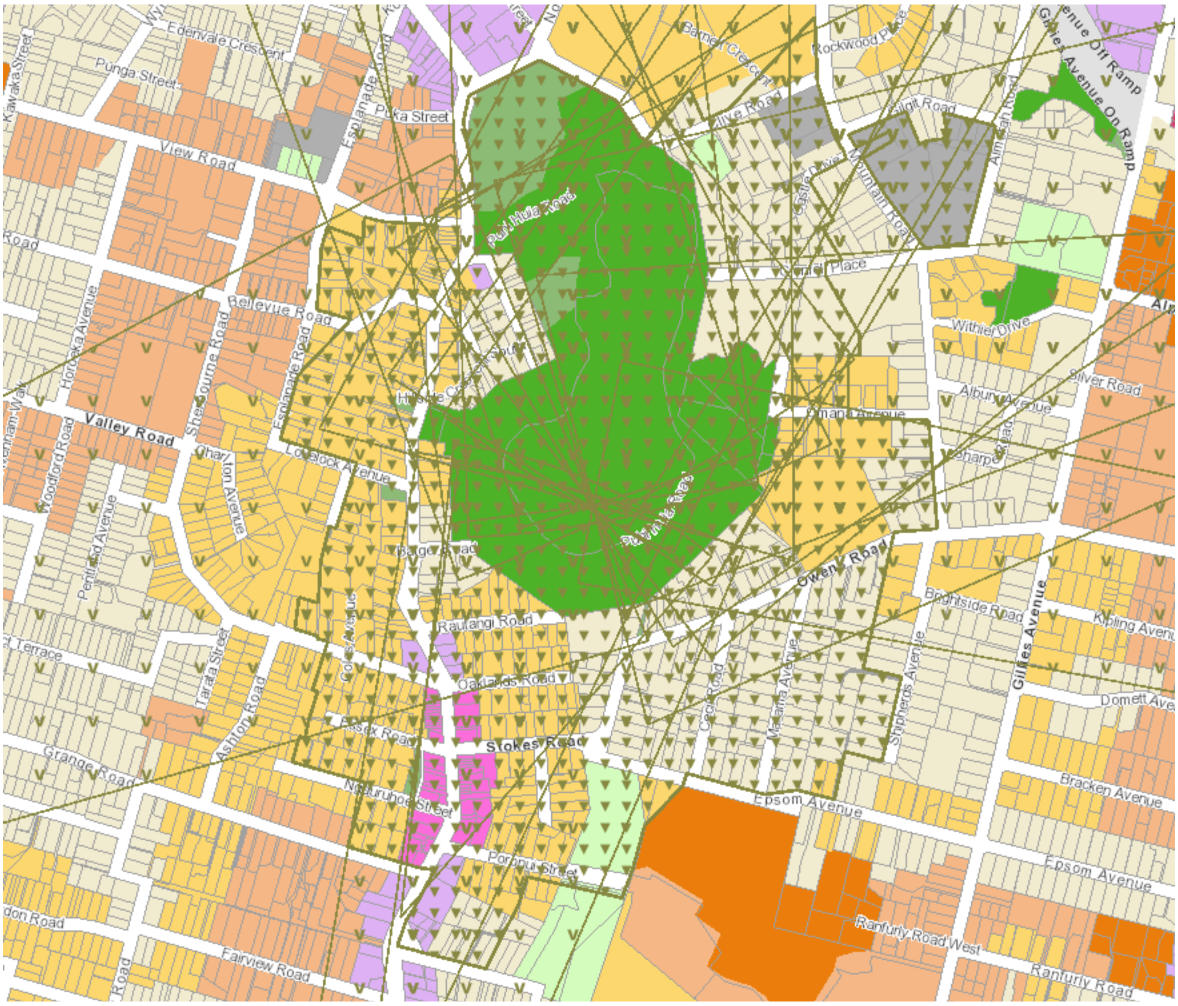
To examine the issue of these two approaches further, I have reviewed the HSAs and explored the extent to which MHU and THAB zones are found within each, and what effect intensification within them would impact on individual maunga. The following images show the full suite of HSAs found around Auckland and the underlying zones within them.



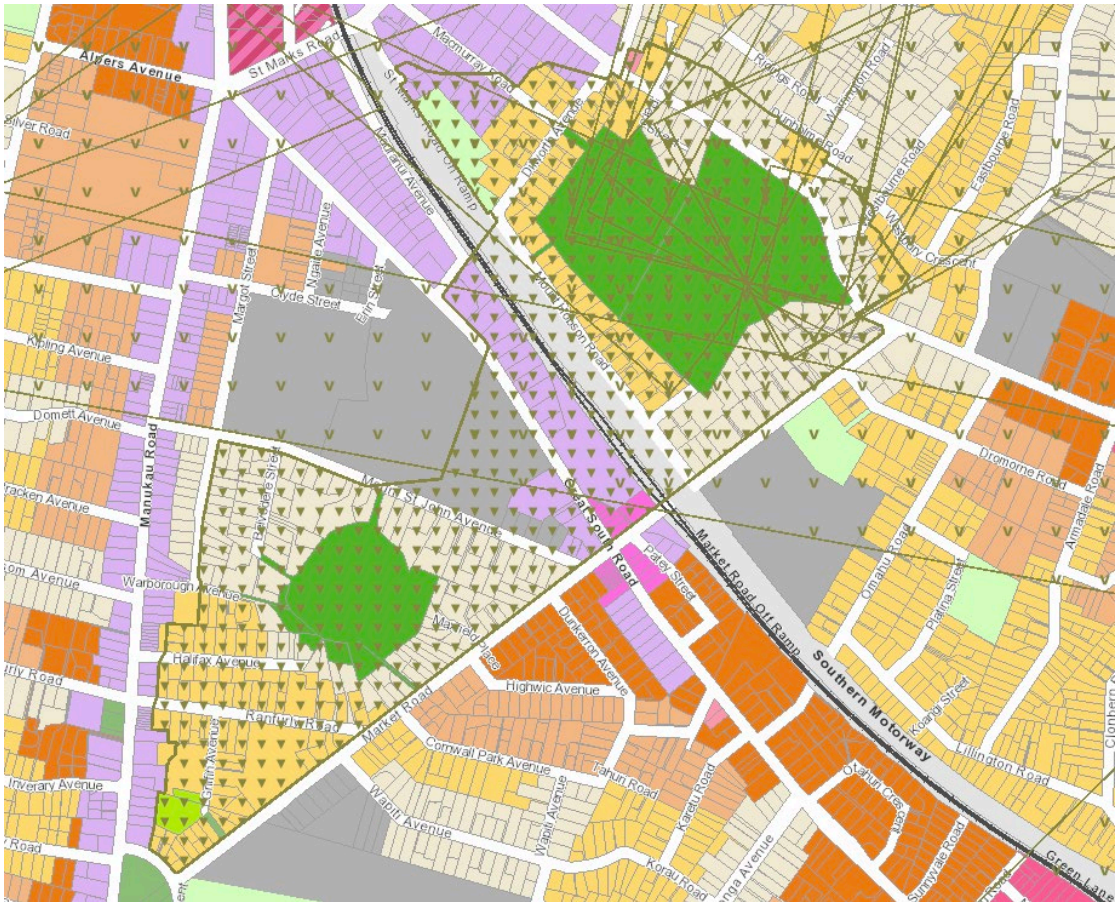
Mt Victoria / Takarunga & North Head / Maungauika



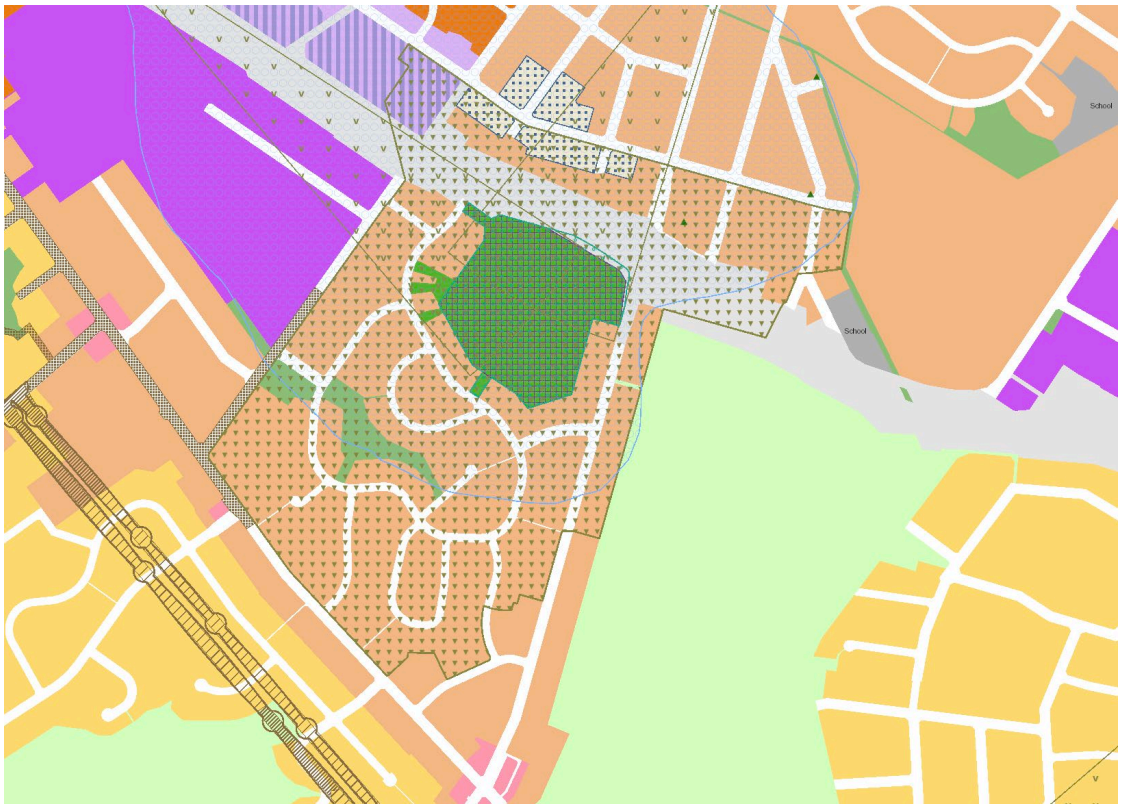
Mt Albert / Owairaka



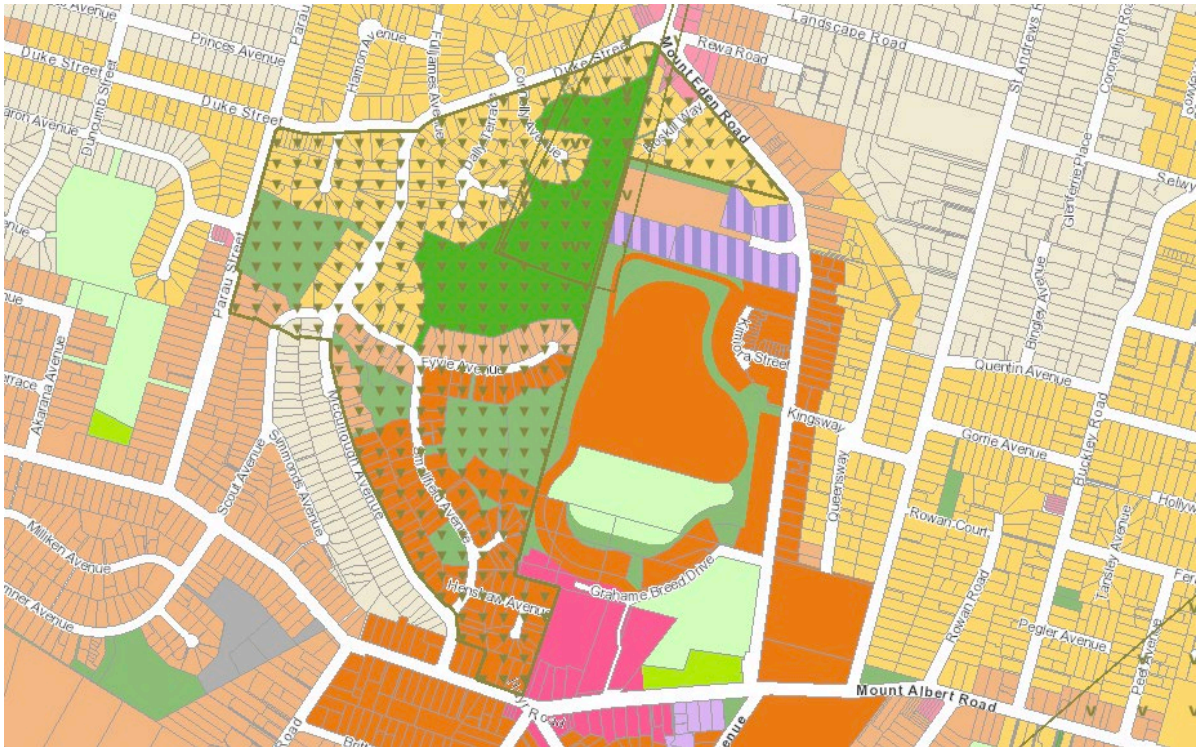
Mt Eden / Maungawhau



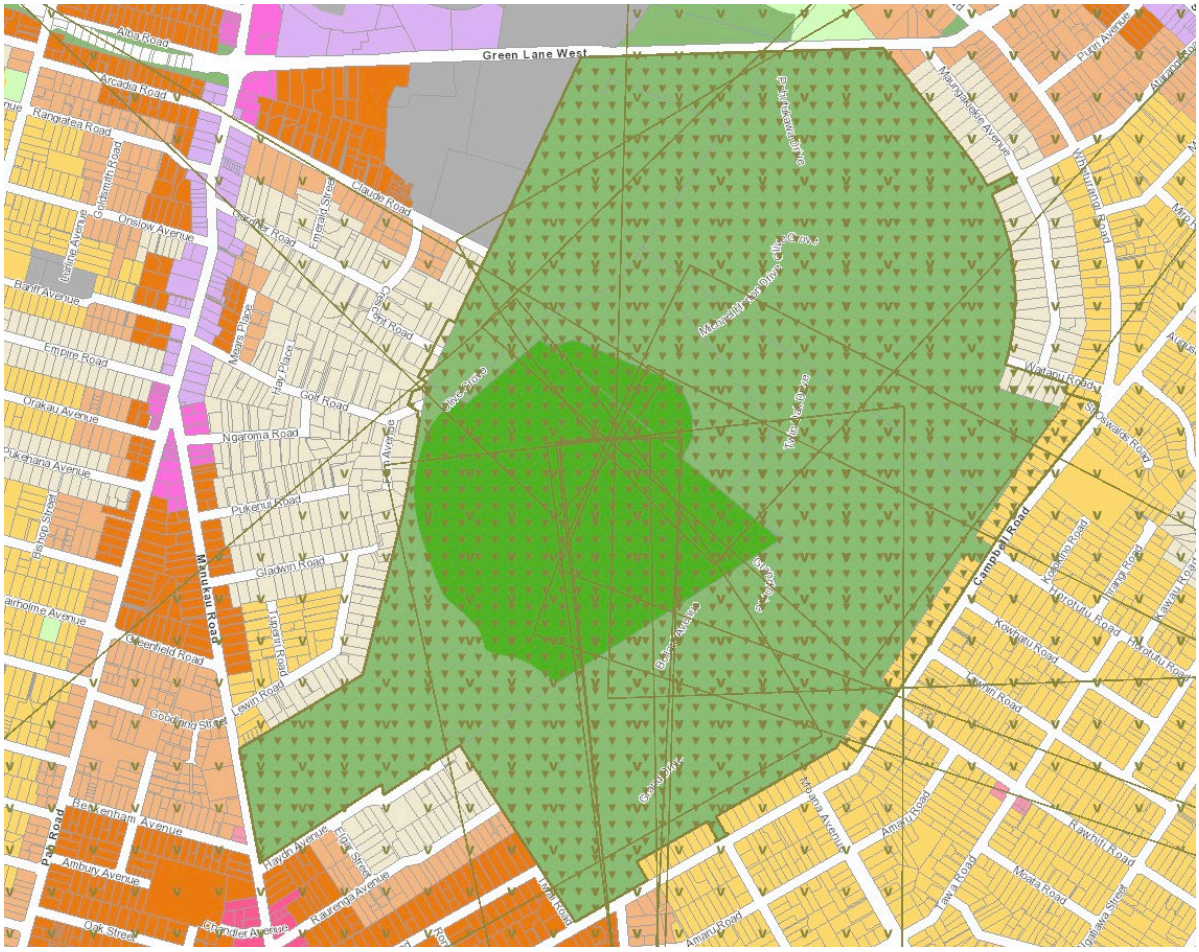
Mt St John / Te Kopuke & Mt Hobson / Ohinerau



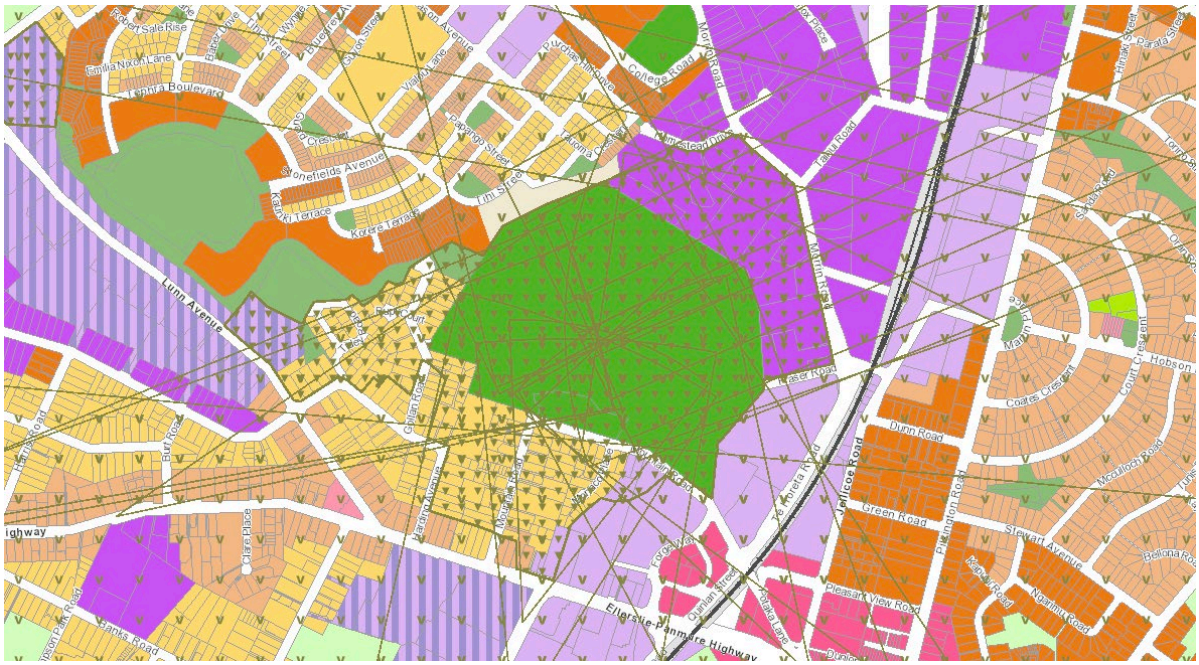
Mt Roskill / Puketapapa



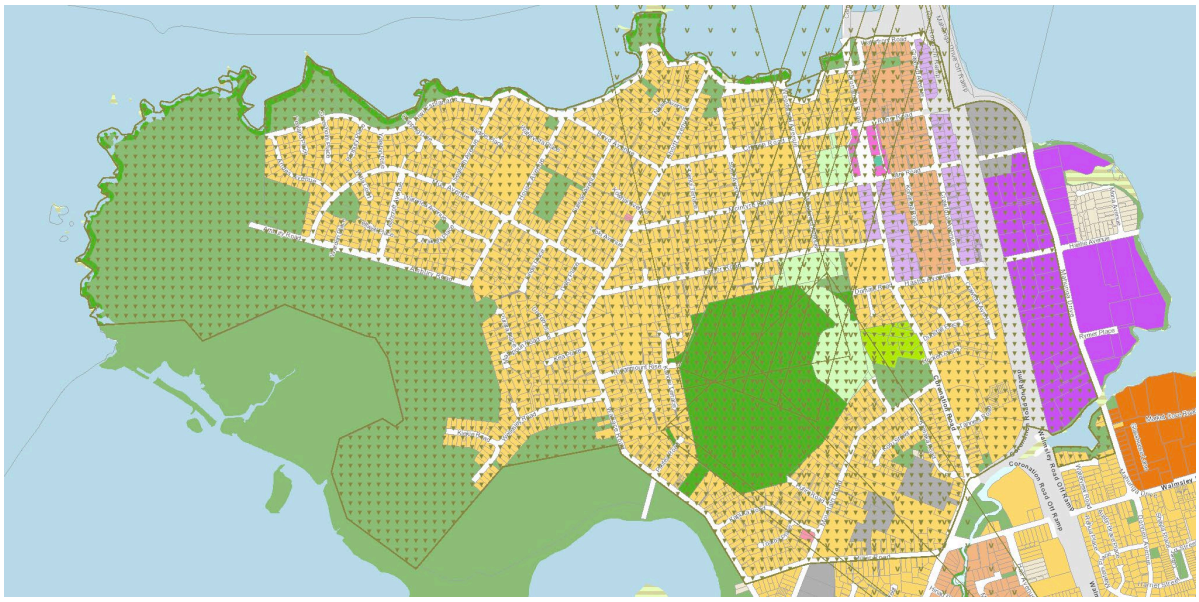
The Big King / Te Tatua a Riukiuta



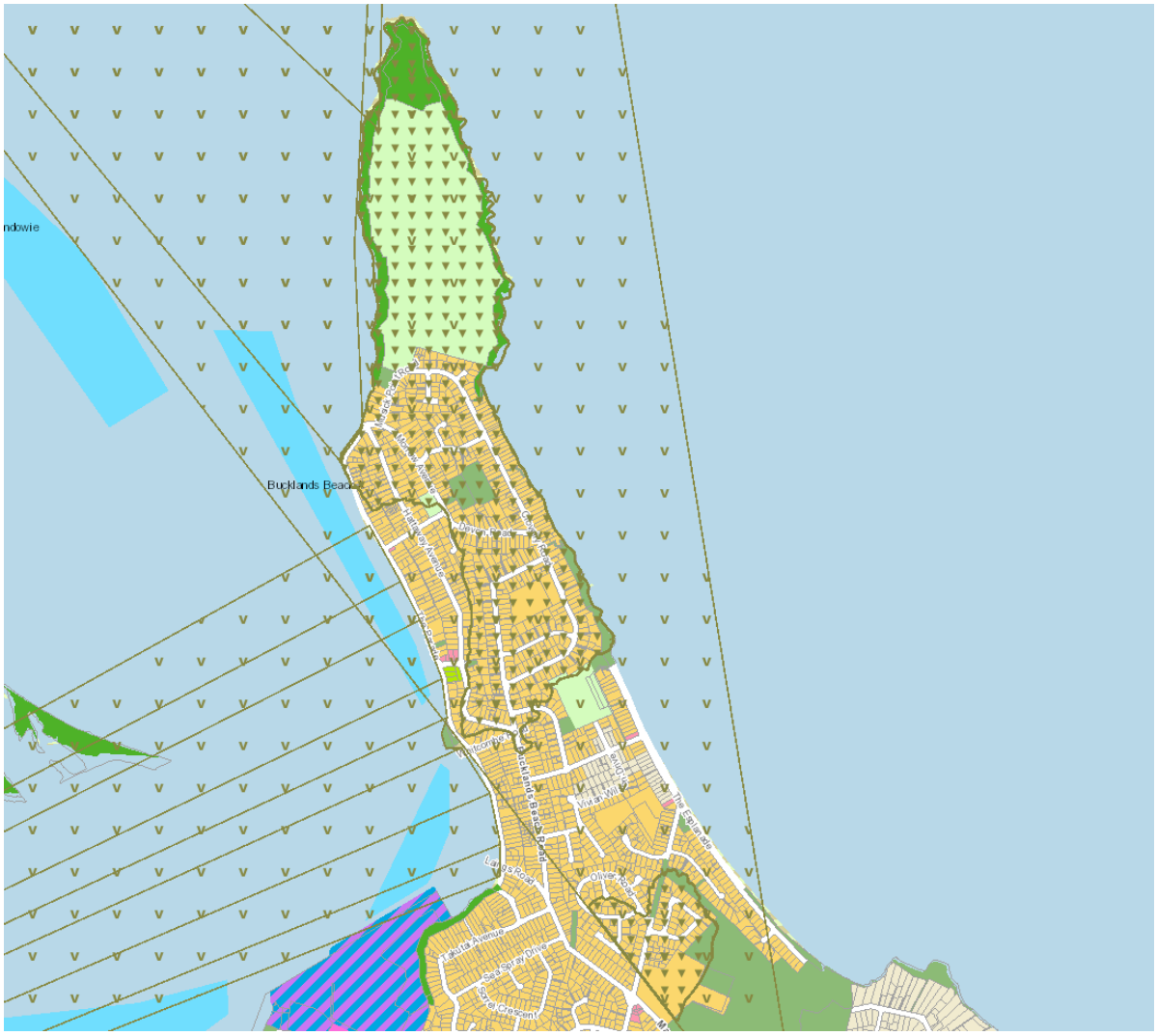
One Tree Hill / Maungakiekie



Mt Wellington / Maungarei



Mangere Mountain



Brown Island / Motukorea

The following table (overleaf) summarises the physical extent of THAB and Business Zoning within each HSA, before examining the strategic location of those zones (if present) and summarising the potential effects of development within them on a 7 point scale:

Very Low

Low

Low-Moderate

Moderate

Moderate-High

High

Very High

Height Sensitive Area:	Physical Extent of THAB and MHU Zones:	Comments About Those Zones & Their Strategic Importance:
Mt Victoria / Takarunga & North Head / Maungauika	None	No MHU or THAB zones are found within the HSA. Potential Effects: **Very Low**
Mt Albert / Owairaka	Limited (MHU Zone)	Most of Owairaka is surrounded by SH and MHS zones; however, the southern side of the maunga contains a pocket of MHU zone that is significant in relation to views from Owairaka Ave and Owairaka Reserve which – importantly – connects up with the network of reserves running between the SH20 and Sandringham Road. Potential Effects: **Moderate**
Mt Eden / Maungawhau	None	The Maungawhau HSA does not include any THAB or MHU zones, Potential Effects: **Very Low**
Mt St John / Te Kopuke	None	The Te Kopuke HSA does not include any THAB or MHU zones, Potential Effects: **Very Low**
Mt Hobson / Ohinerau	None	The Ohinerau HSA does not include any THAB or MHU zones, Potential Effects: **Very Low**
Mt Roskill / Puketapapa	Extensive (MHU Zone)	The western southern and eastern sides of Puketapapa are completely enclosed by MHU zoning, and another strip of MHU zone follows the northern side of SH20 (together with some MHS next to Denbeigh Ave) within the HSA. Development within the MHU area potentially affects key views of the maunga from both Dominion Road and May Road. Potential Effects: **Very High**
The Big King / Te Tatua a Riukiuta	Extensive (THAB & some MHU)	The south-western to north-eastern sides of Te Tatua a Riukiuta are enclosed by mainly THAB zoning, with some more limited MHU zoning near Fyvie Avenue and the northern end of the maunga's reserve. These zones intervene between the maunga and key public vantage points, including Mt Eden Road. Potential Effects: **Very High**
One Tree Hill / Maungakiekie	None	Maungakiekie's HSA mainly comprises Cornwall Park, together with a strip of MHS zone along Campbell Road. Potential Effects: **Very Low**
Mt Wellington / Maungarei	Small scale (MHU)	Two very small pockets of MHU zone are located near the Ellerslie Panmure Highway, but these are effectively 'swamped' by the much larger array of Business zoned land south to north-east of Maungarei. Potential Effects: **Low**

Height Sensitive Area:	Physical Extent of THAB and MHU Zones:	Comments About Those Zones & Their Strategic Importance:
Mangere Mountain	Moderate (Business & MHU)	Most of Mangere Mountain's HSA either comprises MHS zoning or Ambury Regional Park. However, a block of MHU zoned land is located north-east of the maunga, between Mangere Bridge Township and SH20. This has the potential to impact on views from some key roads to, from, and near, the motorway. Potential Effects: **Moderate**
Brown Island / Motukorea	None	The Motukorea HSA does not include any THAB or MHU zones, Potential Effects: **Very Low**

Based purely on this assessment, it appears that replacement of the current SH and MHS zones with an HSA specific zone might well be sufficient to manage development and the adverse effects of more general intensification around most of Auckland's volcanic maunga, including Mt Eden / Maungawhau, One Tree Hill / Maungakiekie, Mt Hobson / Ohinerau and Browns Island / Motukorea. Often such zoning is limited in its extent (Mt Albert / Owairaka) or – as in the case of Mt Wellington / Maungarei) subsumed by adjoining Business zoning, to the extent that development within those pockets would have little impact on the perceived integrity and value of the maunga.

On the other hand, some cones are surrounded by large areas of MHU and/or THAB zoning, notably The Big King / Te Tatua a Riukiuta and Mt Roskill / Puketapapa, while development within an MHU block near Mangere Mountain would have a more limited impact on perception of that maunga. Consequently, much as a single zone approach appears likely to work for the majority of volcanic cones currently protected by HSA controls, it would need to be supplemented by additional controls if the values of these three cones are to be protected in the longer term.

Given the choice solely between a new residential zone and more all-encompassing overlay, to effectively manage development within the HSAs, it therefore appears that the latter would be more effective in general. A new residential zone alone would not achieve the level of management and control considered essential if all of the HSAs are to remain meaningful. Having said this, a hybrid mix of a new zone and an overlay targeted at the Business, MHU and THAB zones (as they are currently) might provide an effective alternative.

2.3 Management of the Viewshaft & HSA Margins

The Volcanic Viewshafts and HSAs are clearly defined and past management of the viewshafts reflects this, eg. in relation to the fine-grained location of the ASB Tower / Auckland Council Building when it was first built and the Planning Tribunal's decline of consent for the original, Symonds Street Sky Tower. In particular, the Viewshafts have been managed in a very 'black and white' fashion, providing little leeway in relation to even relatively minor incursions into them in order to safeguard against any cumulative erosion of

their margins. This includes careful management of private properties both close to, and under, the Viewshafts' origin points, as over-height development within such areas has the potential to significantly erode or obscure the current views of the maunga that they focus on.

On the other hand, there has been limited need to closely manage the margins of the HSAs, except near the reserve / open space edges of each maunga, as the nature of development inside and directly outside most HSAs has been little different. Clearly, this has the potential to change where the NPSUD's walkable catchments and other areas of intensification under the RMAEHS come close to, or encroach into, some HSAs.

Volcanic Viewshafts

As indicated above, there is little point in having Volcanic Viewshafts if permitted development has the potential to obscure or erode them. For that reason, the current viewshafts have been located where they can reasonably survive even a reasonable level of development should occur on properties under, them. If development heights were to be permitted above this 'reasonable' level, with reference to the current AUP, then the point would soon be reached where the vast majority of Viewshafts – largely within suburban streets – are lost or of little value. Consequently, if the Viewshafts are to remain, then a stepped sequence of maximum building heights must be maintained below each of them which accommodates development up to, but not into, them. Any compromise in this regard would result in the progressive erosion of many, and potentially all, of the Volcanic Viewshafts over time. This stepped sequence has to remain pinned at the current levels near most Viewshaft origin points – at or close to 9m. The only obvious exceptions in this regard being those viewshafts that originate on elevated parts of the Southern Motorway (eg. to Mt Eden from the Newmarket Viaduct and Harbour Bridge), looking down motorway corridor (eg. to Mt Albert and Mt Eden from the North-western and Southern Motorways), and from the edge of Auckland's harbours and estuaries (eg. to Mt Wellington across the Tamaki River).

At the same time, the Viewshafts' 'side walls' were delineated so as to capture sufficient of each maunga's profile – together with air space around them – that they would maintain their distinctive profile, appearance and visual presence / primacy, irrespective of the level of development that might occur around them. Although it might be desirable to have more 'breathing space' around some maunga, a balance has been struck between the extent of each viewshaft required to achieve that goal while still accommodating a reasonable level of development around the viewshafts. Accordingly, it is my view that these 'side walls' should also be maintained, with little or no flexibility in relation to their extent.

Height Sensitive Areas

The HSAs are similarly vulnerable to incremental erosion and 'development creep' over time. Again, therefore, it is my view that the height limits imposed on them (typically 9m) should be maintained to the outer edge of each HSA. However, the issue of transition from current suburban environs into neighbouring walkable catchments up to 6 storeys high is not so easily addressed. Although the anticipated 'step up' at such interfaces could actually promote a high degree of interaction between new apartment dwellers occupying the edge of some 6-

storey areas and the maunga within adjoining HSAs, it could also create a quite 'hard', visually impenetrable, wall that 'ring fences' some HSAs. Yet, the wider, amenity implications associated with these points of rapid transition are not unique to the HSA margins: much the same effects would be imposed on those parts of metropolitan Auckland suddenly 'jump up' from the present Single House and Mixed Housing Suburban zones into the new 6-storey plus development within walkable catchments.

This then begs the question: 'would the presence of the HSA change this situation and generate effects not otherwise associated with such areas of transition?' In reality, I'm not sure it would. Individual HSAs would retain their visual permeability and visual access to local maunga because of the height controls implemented within each HSA. Visual access to individual maunga would therefore remain much as at present within their bounds. What would be lost are more isolated glimpses of the maunga from outside those same HSAs, within areas more widely affected by intensification. At the same time, however, longer distance views, which remain important to the wider community, would still (hopefully) be protected by the Volcanic Viewshafts.

On balance, therefore, it is difficult to identify any effects related directly to the maunga and implementation of s.6(b) that are specific to the areas of potential transition just described. By and large, the presence of an HSA does not appear to confer grounds for a more subtle or gradual stepping of development (and related transition) than will occur more generally across metropolitan Auckland. Although intensification around some HSAs, such as those ringing Mt Eden, Mt Albert and Mt Wellington, could create a marked 'bowl' of lower development around individual maunga, the more significant effects emerging on the edge of such areas would relate to the abruptness of change from 2 to 6 storeys and the sense of imposition that this generates for some HSA residents. Yet, these amenity effects would be common to many areas abutting walkable catchments. They would not impact on local views of the maunga or public perception of them.

Consequently, the nature of transition at the edge of the walkable catchments would have little, if any, impact on their value as ONFs and integrity, or their overall protection under section 6(b) of the RMA and Chapter B.4 of the AUP. As a result, it seems that there are no obvious grounds for treating the interface of the HSAs with walkable catchments any differently from those found throughout the rest of Auckland City.

In a theoretical vein, however, there still remains the possibility of intensification occurring within some HSAs in the future – irrespective of current Council / AUP strategies and policies. This would have a much more significant effect than intensification around the HSA margins. There are two key components to intensification:

- Increased building height – which has the potential to project vertically into the profiles of individual maunga, together with the breathing space around them that helps to 'shape' and define their distinctive profiles.

- Lateral 'in-fill' - which has the potential to occupy the spaces between existing dwellings and thus remove the gaps between them that are often critical in terms of

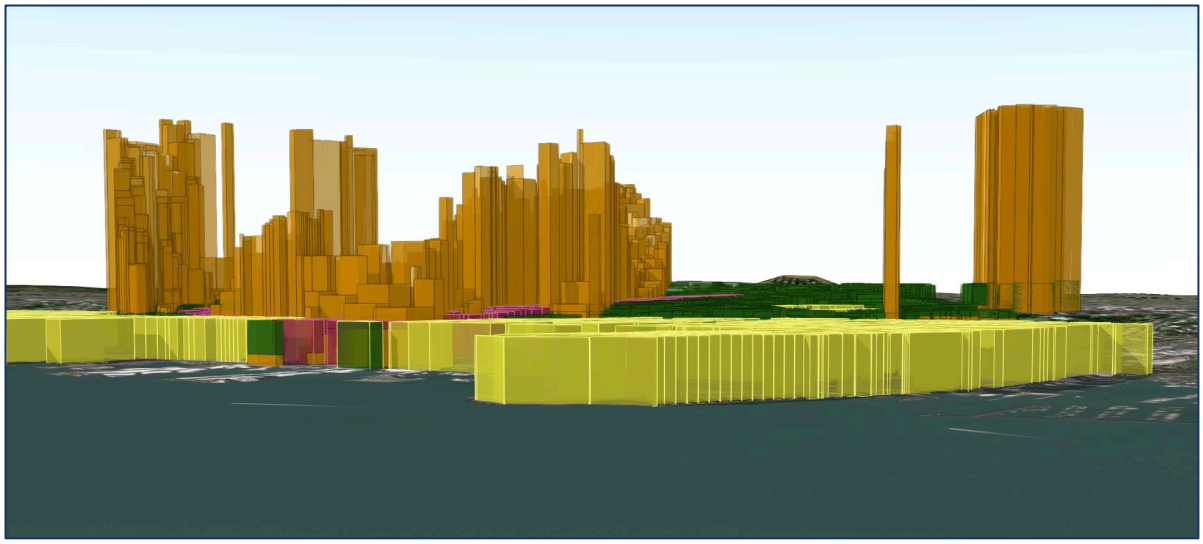
the myriad glimpses and small-scale views of maunga that also contribute to their 'ownership' by local communities.

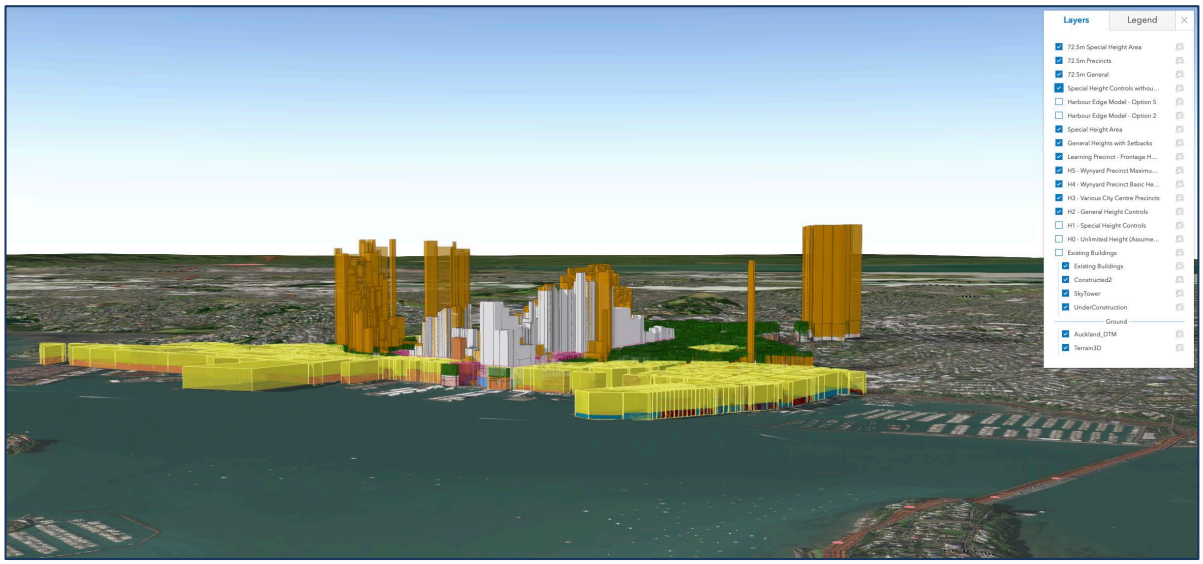
Together, such changes have the potential to create walls of development between individual streets and the local street networks that they are currently linked to. Consequently, intensification within the HSAs has the potential to rapidly erode or remove some and reshape others – by removing the visual links that are fundamental to their existence. Although increased building height has the greater immediate potential to screen out some maunga, intensification that just results in the in-filling of spaces between existing dwellings has the potential to remove or reduce such connections – to the point where some HSAs would need to be reviewed and remapped, conceivably removed altogether. This has the potential to significantly reduce the connectivity between communities and the maunga that they currently feel connected with.

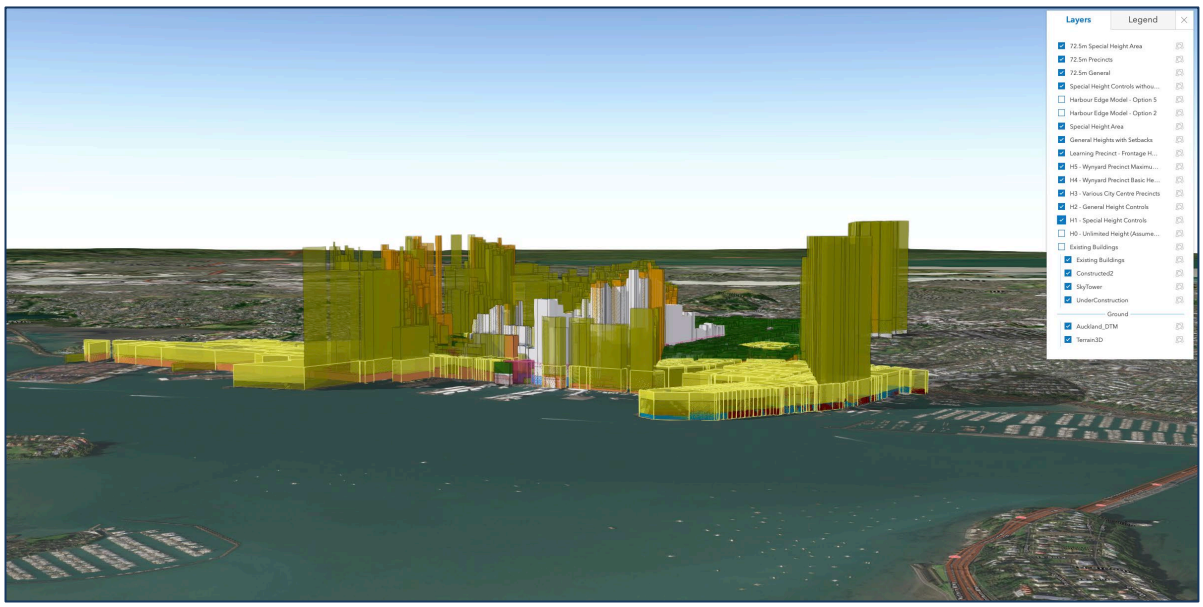
2.3 The Volcanic Cones & The Form of The Central City

Currently, the volcanic cones are central to a 'language' of landforms spread across the Isthmus and its margins that express a volcanic field. They lies at the centre of an array of overlapping ridges, lava fields and craters / basins that are fundamental to Auckland's identity and sense of place. For the most part, existing development across Auckland's metropolitan area largely mirrors, or at least shows some sympathy for, that 'statement'.

However, unfettered development outside the Volcanic Viewshafts and HSAs, together with the City's waterfront precincts, would introduce a quite different geomorphic language to the Isthmus and, in particular (but not solely), other near-CBD areas: one of abruptly uplifted buildings terminating at sharp edged 'cliff's' and 'escarpments'. Some pockets of development would rise up as seemingly quite incongruous blocks on the outer edge of the CBD while others would rear up, as seemingly isolated outliers of the CBD – as the following modelling, undertaken by Architectus for Auckland Council, clearly reflects.

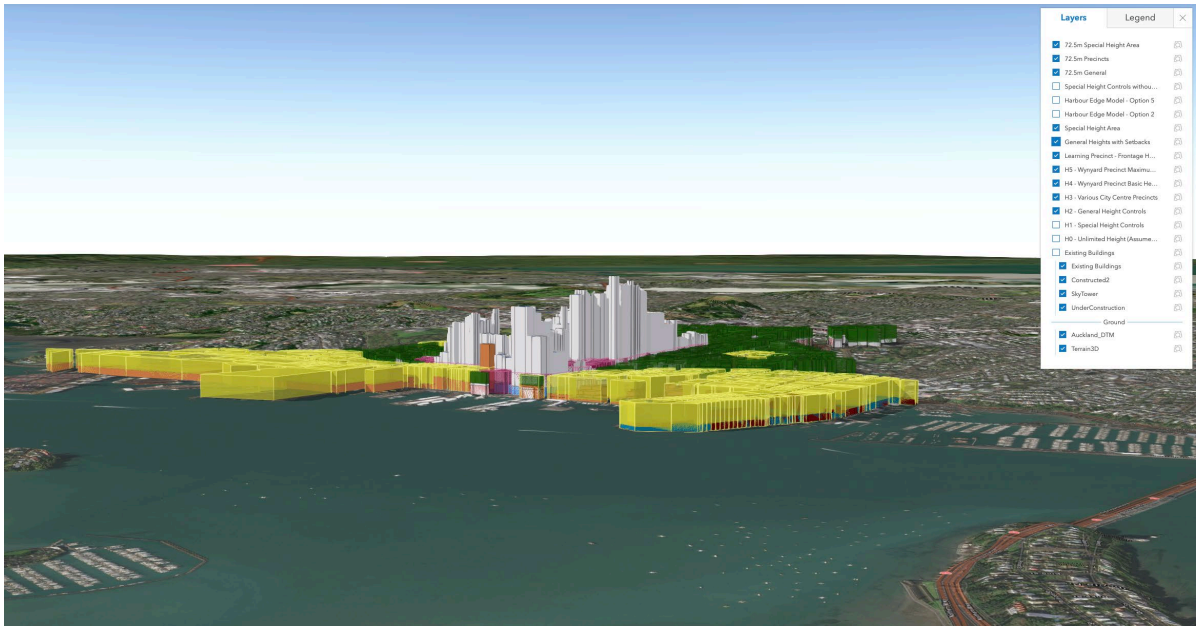






Different permutations on this scenario, as shown above, would also introduce built forms that visually suppress, even subjugate, the natural landforms and geomorphological heritage of Auckland City. Key volcanic features, like Mt Eden would be reduced to the role minor geomorphological ‘bumps on the horizon’ within viewshafts that are framed by exceptionally tall and dominant buildings either side of them.

At the same time, the future central city would become increasingly reliant on the quality and character of individual buildings to express its character and qualities. A much less dramatic and self-focused level of change would therefore be needed if a feeling of balance is to be retained between the wider landscape of Auckland’s volcanic field and its other natural features (including both harbours) and Auckland’s future built / cultural environs. This approach is reflected in the following scenario also modelled by Architectus (overleaf).



The level of high rise development still accommodated under this scenario would remain highly significant, but it:

- Would impinge less on the City's wider array of natural landforms and harbours, both in terms of scale and the extent of high rise development, and by avoiding the reduction of views to the volcanic field to a series of isolated 'windows' and glimpses from key parts of the motorway system;

- Would reinforce the centrality of the CBD, devoid of the outlying fragments of development visible under looser management that have the potential to interrupt and 'fracture' Auckland's wider landscape;

- Would provide a feeling of transition into those areas of less intensive (albeit still tall and still relatively intensive) development around the CBD; and

- Would help to maintain Auckland's balanced identity as both a city of harbours and volcanic cones.

Overall, it is my assessment that this more balanced approach to future development is essential if Auckland is to retain its sense of place, and not become another amorphous city whose identity is increasingly dictated by buildings / towers that are, by their very nature, both individualistic and competitive with one another.

3. Outstanding Natural Landscapes

Although some 89 Outstanding Natural Landscapes (ONLs) are identified across the Auckland Region (Schedule 7), only a relatively small number are located on the margins of Auckland's metropolitan area and on the edge of locations, such as Warkworth, that might be affected by the delineation of walkable catchments. Those closer to central Auckland are shown on **Attachments 34** and **35** and (from north to south) include:

ONL 33. Omaha Kahikatea Swamp Forest (Omaha)

ONL 35. Northern & Mangatawhiri Spit (Omaha)

ONL 38. Matakana River South (Algies Bay & Sandspit)

ONL 43. West Mahurangi Harbour (Warkworth)

ONL 44. Mahurangi – Waiwera (Hatfields Beach)

ONL 50. Shakespeare Regional Park & Coastline (Whangaparaoa Peninsula)

ONL 51 Okura Estuary (Long Bay)

ONL 53. Lucas Creek (Albany)

ONL 54. Okura Estuary Headlands (Long Bay)

ONL 69. Omana Regional Park

ONL 71. Mangemangeroa Creek Escarpment (Shelly Park / Howick & Whitford)

ONL 72. South Titirangi (Titirangi & Waima)

ONL 73. Waitakere Ranges & Coastline (Waitakere foothills, Swanson, Henderson Valley & Titirangi)

Of these ONLs, by far the largest comprises the Waitakere Ranges and its foothill margins. These are described in Chapter B4.1 as follows:

> *The Waitākere Ranges form an important natural backdrop to metropolitan Auckland and are outstanding for their terrestrial and aquatic ecosystems. The landscape has significance to Mana Whenua and has highly regarded cultural and spiritual values. Development is generally sparse, does not dominate the natural environment and should continue to reflect the heritage features of the Waitākere Ranges. Resource management issues in the Waitākere Ranges Heritage Area include:*
>
> *(1) managing the pressure to accommodate further development in the Waitākere Ranges and their foothills;*

(2) *managing the cumulative effects of development on the landscape and the desired future character and amenity values of the Waitākere Ranges Heritage Area and its natural environment;*

(3) *enabling the social and economic well-being of local communities in the area, including infrastructure necessary to service those communities.*

Management of the Waitakeres, together with other ONLs, is addressed in the AUP by the following provisions (among others):

B4.2.1. Objectives

(1) Outstanding natural features and landscapes are identified and protected from inappropriate subdivision, use and development.

D10.3. Policies [rcp/dp]

(1) Protect the physical and visual integrity of outstanding natural landscapes by:

(a) avoiding the adverse effects of inappropriate subdivision, use and development on the natural characteristics and qualities that contribute to the values of the outstanding natural landscape;

(b) maintaining the visual coherence and integrity of the outstanding natural landscape;

(c) maintaining natural landforms, natural processes and vegetation areas and patterns;

(d) maintaining the visual or physical qualities that make the landscape iconic or rare; and

(e) maintaining high levels of naturalness in outstanding natural landscapes that are also identified as outstanding natural character or high natural character areas.

(2) Protect the physical and visual integrity of outstanding natural landscapes while taking into account the following matters:

(a) the extent of anthropogenic changes to the natural elements, patterns, processes or characteristics and qualities;

(b) the presence or absence of structures, buildings or infrastructure;

(c) the temporary or permanent nature of any adverse effects;

(d) the physical and visual integrity and the natural processes of the location;

(e) the physical, visual and experiential values that contribute significantly to the natural landscape's values;

(f) the location, scale and design of any proposed development; and

(g) the functional or operational need of any proposed infrastructure to be located in the outstanding natural landscape area.

At a broad strategic level, it is my assessment that the core values of the Region's ONLs can only be protected – again, in accordance with s.6(b) of the RMA – if their core values

are maintained at, or very close to, the levels apparent when first identified as ONLs. Those core values include:

Biophysical Values: primarily related to flora, fauna, landforms and water / sea bodies;

Experiential Values: including expressiveness, legibility / aesthetic value, perceived naturalness and intactness, coherence and continuity;

Associative Values: including cultural / Māori associations and attachments, historical associations, other community values (such as identity and sense of place), educative and scientific values.

However, as indicated in Policy D10.3(2), an important consideration is the level of 'anthropogenic change' that is already associated with individual ONLs and the current presence of buildings, structures and – by extension – land uses or activities. In this regard, many of the ONLs listed above already derive at least some of their value from their visual counterpoint with existing areas of development near or abutting them. Such examples include the ONLs bounding, or close to, Omaha, Warkworth, Algies Bay, Hatfields Beach, the Whangaparaoa Peninsula, Long Bay, the Lucas Creek, Mangemangeroa Creek and Maraetai.

Potential intensification near these ONLs might well increase the visual contrast already associated with them, but it would not fundamentally change their 'internal' / intrinsic values or their relationship to Auckland's metropolitan areas and coastal settlements. If anything, their perceived value might well be enhanced by engagement with residential areas that are more intensively developed and occupied. In many instances, this would go beyond just enhancement of their experiential values to also embrace their perceived natural heritage, and more passive recreational, values.

Consequently, I am not concerned about residential intensification under the NPSUD and RMAEHS for the majority of ONLs identified above, providing the integrity of their boundaries is maintained. In many cases, such protection is, in fact, already provided by adjoining or coincident 'buffer areas', such as the sports fields of Te Puru Park between Beachlands and ONL 69, and those parts of Omana Regional Park not within ONL 69 that nevertheless serve to frame and protect most of its margins. At Long Bay, the 'early settler' heritage landscape effectively added to Long Bay Regional Park by the Environment Court combines with the flats near Vaughans Stream and part of the Vaughans Road ridge to separate the coastline and headlands at the centre of ONL 54 from Long Bay's rapidly evolving development areas, whereas at Hatfields Beach the coastal edge of ONL 44 is both protected and buffered (visually, as well as physically) by the Hatfields Beach Recreation Reserve. Further north, the Mahurangi River mediates between Warkworth's town centre and the river escarpment of ONL 43, while at Omaha, ONLs 33 and 35 are separated from the existing coastal settlement by a golf, course road corridor and sequence of protected sand dunes.

Conversely, around Titirangi, as well as within much of the Waitakere foothills area, there is much more intermixing of lower density, residential development with the tracts of bush, stream courses and Manukau Harbour coastline at the core of ONLs 72 and 73. For the most

part, however, there is little real likelihood of intensification under the NPSUD and RMAEHS affecting this area, with (as far as I am aware) just one such area having been identified as a possible walkable catchment, in the vicinity of Swanson Village. This area is located within the physical scope of the Waitakere Ranges Protection Act, but not ONL 73.

As a result, just two ONLs are of direct concern in relation to the NPSUD, the RMAEHS, and their effects. ONL 43 (below) is strung along the Mahurangi River, and its escarpment could potentially be visually 'over topped' by intensive development off Sandspit Road. This would conceivably diminish its perceived naturalness, coherence and significant aesthetic appeal. In turn, this could have an impact on the overall character of the ONL and even the identity of both it and central Warkworth – which is strongly framed by both the river and its escarpment / bush corridor. In fact, a Plan Change has already been lodged with Auckland Council seeking to promote intensification in this area at 34-36 Sandspit Road, although it remains uncertain whether the land around Sandspit Road will become a walkable catchment, so that even this potential issue remains little more than conjecture at present.

ONL 43 opposite Warkworth's town centre

The second area of concern is an elevated part of ONL 54 at Long Bay (overleaf). Although most of this ONL is buffered from nearby development areas by Long Bay Regional Park, the Vaughans Stream flats and part of the Vaughans Road ridge system (as described above), it also remains susceptible to visual 'over topping' and domination near the end of the Vaughans Road leading out to Piripiri Point. Again, this could conceivably have an adverse effect on the character and values of ONL 54, including the current predominance of natural features and elements around its headlands and coastal valleys, its overall cohesion and unity, and its aesthetic appeal and identity.

ONL 54 showing the development area at the Vaughans Rd ridge and the ONL extending up to and around Piripiri Point

Overall, therefore, it appears at this stage that the NPSUD and RMAEHS would have a limited impact on the vast majority of ONLs that ring Auckland's metropolitan area and other growth centres, providing the physical integrity of those ONLs is protected and maintained. If walkable catchments were to be identified near Sandspit Road and on the Vaughans Road ridge, then some form of transition – stepping down in relation to both height and intensity – may be required to protect the margins and integrity of ONLs 43 and 54. Elsewhere, however, it appears that few, if any, such measures are currently required.

Again, therefore, I can only reiterate my support for protection of the physical integrity of all of Auckland's ONLs (as per Schedule 7 in the AUP), at least initially through their identification as Qualifying Matters. In my opinion, this approach is consistent with the RMA's inclusion of s.6(b) – addressing Outstanding Natural Features and Landscapes – as one of its Matters of National Importance, together with Policy 15 of the NZ Coastal Policy Statement and related provisions in AUP Chapters B.4 and D.10. In combination, it is my view that these statutory instruments effectively mandate such protection.

4. Areas of Outstanding & High Natural Character

The AUP contains a similar range of provisions addressing management of the natural character of the coastal environment. However, the level of control associated with such management is elevated by s.6(a)'s mandate for 'preservation' (as opposed to protection) of such values. Thus, Policy 13(1) of the NZ Coastal Policy Statement addresses both the preservation of natural character values and the protection of them from inappropriate subdivision, use and development by requiring:

- the avoidance of adverse effects in areas of the coastal environment with outstanding natural character; and
- the avoidance of such effects – or their remediation or mitigation – in all other areas of the coastal environment.

Related objectives and policies in the AUP include the following:

B8.2. Natural character

B8.2.1. Objectives

(1) Areas of the coastal environment with outstanding and high natural character are preserved and protected from inappropriate subdivision, use and development.

(2) Subdivision, use and development in the coastal environment are designed, located and managed to preserve the characteristics and qualities that contribute to the natural character of the coastal environment.

(3) Where practicable, in the coastal environment areas with degraded natural character are restored or rehabilitated and areas of high and outstanding natural character are enhanced.

B8.2.2. Policies

(1) Identify and evaluate areas of outstanding natural character or high natural character considering the following factors:

(a) natural elements, processes and patterns;

(b) biophysical, ecological, geological and geomorphological aspects;

(c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

(d) the natural movement of water and sediment;

(e) the natural darkness of the night sky;

(f) places or areas that are wild or scenic; and

(g) experiential attributes, including the sounds and smell of the sea, and their context or setting.

(3) Preserve and protect areas of outstanding natural character and high natural character from inappropriate subdivision, use and development by:

(a) avoiding adverse effects of activities on natural character in areas of the coastal environment scheduled as outstanding natural character; and

(b) avoiding significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment.

(4) Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character of the coastal environment not identified as outstanding natural character and high natural character from inappropriate subdivision, use and development.

D11.2. Objectives [rcp/dp]

(1) The natural characteristics and qualities of areas with outstanding natural character, or high natural character values are preserved and protected from inappropriate subdivision, use and development.

(2) Where practical areas with outstanding natural character or high natural character values in the coastal environment, including areas in the Waitākere Ranges Heritage Area and the Hauraki Gulf/To Moana Nui o Toi/Tīkapa Moana, are enhanced.

D11.3. Policies [rcp/dp]

(1) Subdivision, use and development in areas scheduled in Schedule 8 …… must:

(a) avoid adverse effects on the natural characteristics and qualities that contribute to the natural character values of outstanding natural character areas;

(b) avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects, on the characteristics and qualities that contribute to the natural character values of high natural character areas;

(c) maintain significant landforms and indigenous vegetation and habitats that are significant natural characteristics and qualities in outstanding natural character and high natural character areas, to protect the visual and biophysical linkages between areas, while taking into account:

(i) the location, scale and design of the proposed subdivision, use or development;

(ii) the extent of anthropogenic changes to landform, vegetation, coastal processes and water movement;

(iii) the presence or absence of structures, buildings or infrastructure;

(iv) the temporary or permanent nature of any adverse effects;

(v) the physical and visual integrity of the area, and the natural processes of the location;

(vi) the intactness of any areas of significant vegetation and vegetative patterns;

(vii) the physical, visual and experiential values that contribute significantly to the wilderness and scenic value of the area;

(viii) the integrity of landforms, geological features and associated natural processes, including sensitive landforms such as ridgelines, headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs, streams, rivers and surf breaks;

(ix) the natural characteristics and qualities that exist or operate across mean high water spring and land in the coastal environment, including processes of sediment transport, patterns of erosion and deposition, substrate composition and movement of biota, including between marine and freshwater environments; and

(x) the functional or operational need for any proposed infrastructure to be located in the area.

(2) Promote land use practices and restoration activities that will enhance the values of outstanding natural character and high natural character areas.

Again, at a generic level I support these provisions, which reflect that s.6(a) is the first of the RMA's listed Matters of National Importance. In my opinion, this again means that all identified areas of Outstanding and High Natural Character in the AUP (Schedule 8) should be identified as Qualifying Matters that avoid being subject to residential intensification.

4.1 Outstanding Natural Character Areas

Focusing more directly on the Region's identified ONC Areas (Schedule 8), as shown in **Attachment 36**, it is apparent, however, that none intersect with, or abut, areas that might be subject to residential intensification. This includes more remote areas on Waiheke Island, mainly in the vicinity of Rocky Bay and Whakanewha Regional Park.

Consequently, it is not considered likely that the NPSUD and RMAEHS have any implications for the ONC Areas identified across the Region. Even so, given their extremely high environmental value, it is my opinion that it would still be appropriate to identify them as Qualifying Matters under the NPS's Policy 4.

4.2 High Natural Character Areas

On the other hand, the HNC Areas shown on **Attachments 37** and **38**, together with others near some of Auckland's coastal settlements, are more widespread. They often sit close to the margins of Auckland's metropolitan area – at Kauri Point, within the Lucas Creek, abutting Long Bay and Okura, at the end of Whangaparaoa Peninsula, and around Pollen Island and Tohuna Torea – as well as being near the coastal settlements of Omaha, Warkworth, Algies Bay, etc. As a result, their distribution is broadly similar to that of Schedule 7's ONLs. The issues posed by the NPSUD and RMAEHS are also largely similar to those described for Auckland's ONLs and – generally speaking – somewhat limited.

Consequently, many of Schedule 8's HNC Areas already contrast with neighbouring areas of development, generating a feeling of positive tension and engagement. This feeling of 'beneficial' counterpoint would often increase with intensification of the housing areas near many HNC Areas. Examples of where this could be the case include:

HNC Areas 48 & 51: Te Arai & Pakiri Beach and Ti Point (Leigh)

HNC Area 53. Omaha

HNC Ara 57. Brick Bay (Sandspit)

HNC Areas 85 & 86: Waiwera River and Waiwera

HNC Area 88. Shakespeare Regional Park (Whangaparaoa Peninsula)

HNC Areas 102-105. Lucas Creek

HNC Area 139. Pollen Island (inner Waitemata Harbour)

HNC Area 140. Watchman Island (Waitemata Harbour)

HNC Area 141. South Titirangi (Manukau Harbour)

HNC Area 142. Tohuna Torea (Tamaki River)

HNC Area 143. Motukoraka Island (Beachlands)

Other HNC Areas will also remain, as now, physically buffered from development near them, including many of those identified around the southern Manukau Harbour, in the Mahurangi Harbour and around the Tawharanui Peninsula.

Moreover, although the coastal margins of Big Muddy Creek through to Huia on the northern side of the Manukau Harbour are interspersed with pockets and ribbons of housing – often up and down ridgelines – it is unlikely that such areas will come under pressure from the NPSUD as potential walkable catchments and the RMAEHS.

It is, however, also recognised that a number of other HNC Areas might be visually 'over topped' or dominated by new development on ridges behind them; and this is potentially an issue in relation to the following HNC Areas:

HNC Area 58. Mahurangi River Southern Escarpment (Warkworth)

HNC Area 87. Coal Mine Bay (Whangaparaoa Peninsula)

HNC Area 89. Matakatia Bay (Whangaparaoa Peninsula)

HNC Area 91. Weiti River (Whangaparaoa Peninsula)

HNC Area 92. Chenery Road (Whangaparaoa Peninsula)

HNC Area 95. Long Bay

HNC Area 96. The Tor (Torbay)

HNC Area 99. Kauri Point (Birkenhead)

HNC Area 101. Oruamo Creek (Greenhithe)

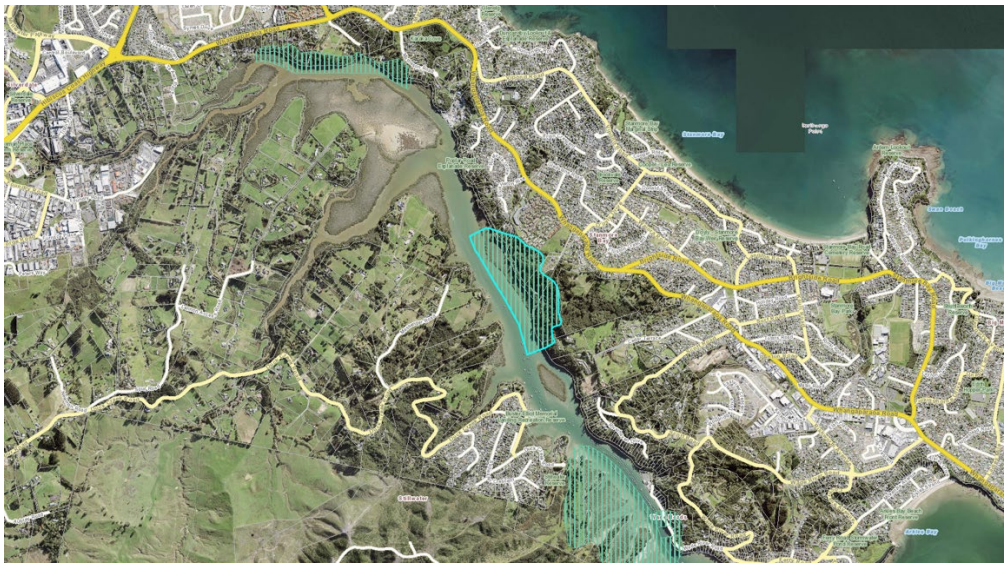
HNC Area 201. Lowtherhurst Reserve (Massey)

HNC Area 58 following the Mahurangi River

HNC Area 87 Coal Mine Bay

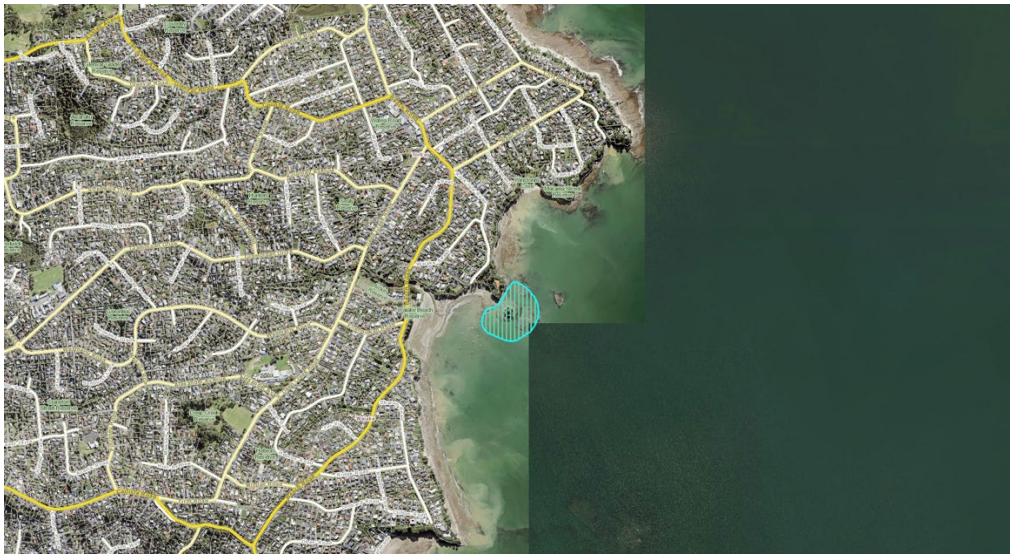
HNC Area 89 Matakatia Bay

HNC Area 91 Weiti River



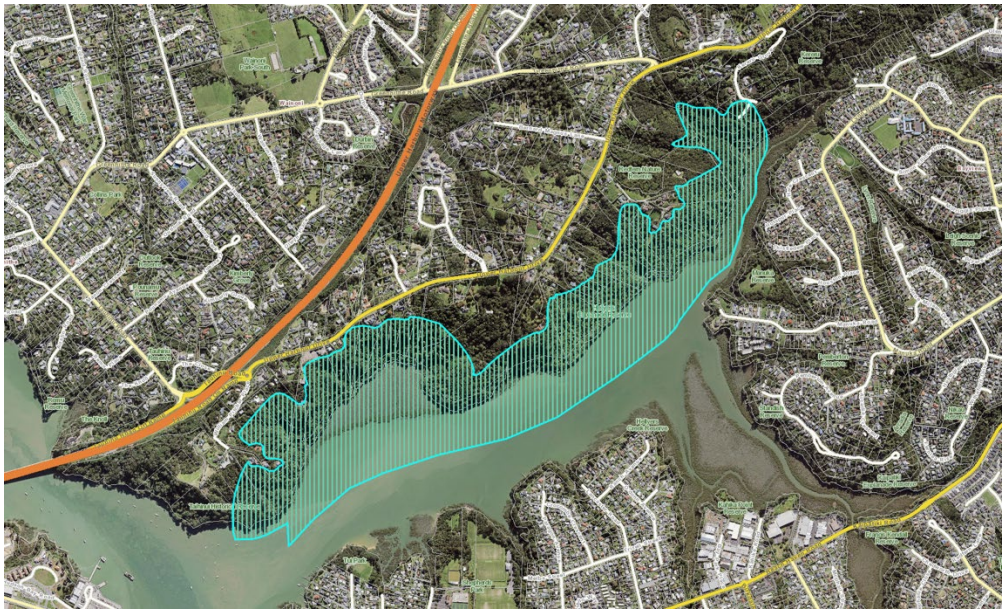
HNC Area 92 Chenery Road

HNC Area 95 Long Bay



HNC Area 96 The Tor

HNC Area 99 Kauri Point



HNC Area 101 Oruamu Creek

HNC Area 201 Lowtherhurst Reserve

However, there is already a very marked point of division between most of these coastal areas and adjoining areas of development. Intensification along these HNC Area interfaces would exacerbate this division, but not change its nature. In fact, with the possible exception of HNC Area 58, I have been unable to find a location where any additional height controls would be required to maintain the current characteristics and values of the HNC Areas identified above. Instead, the effects arising from intensification would be largely incremental in nature.

It is therefore considered that all HNC Areas should be identified as Qualifying Matters – like ONLs and ONC Areas – but there would not be any need to additional height and/or intensity controls at their interfaces with Auckland's metropolitan area and settlements.

One issue not addressed this far is that of intensification within Auckland's coastal environment more generally and whether this would comprise a 'significant adverse effect' with respect to 13(1)(b) of the NZCPS. In response to this matter, it is important to recognise that:

- Such intensification is much more likely to occur within Auckland's metropolitan area – which is already substantially shaped and defined by urban development, irrespective of where the coastal environment starts and ends; and

- Those areas of elevated value and sensitivity on the margins of the city and its outlying settlements are already identified as HNC Areas, and I am of the view that they will retain their integrity without additional interface controls. In a similar vein, 'other areas' that are not identified as HNC Areas within the Coastal Environment, are already typically so modified that it would make little difference if intensification were to occur within them. In effect, the location of the HNC Areas creates a series of buffers around Auckland's metropolitan area where protection against further development that might generate 'significant adverse effects' – including intensification – is needed.

Given this situation, it would be very difficult to justify and implement policies that effectively accord the coastal environment the status of a ‘qualifying measure’ – especially so where intensification is already apparent, such as around Auckland’s CBD and Wynyard Quarter, around Mission Bay, Kohimarama and St Heliers, or up much of the North Shore’s ‘east coast bays’. It is my opinion, instead, that policy measures should focus on preservation of the natural character values of the HNC and ONC Areas discussed above, in accordance with Policy 13 (in particular) of the NZCPS.

Stephen Brown

BTP, Dip LA, Fellow NZILA

Appendix B - Maunga Authority Letter

23 September 2025

Jess Dingle
Senior Policy Planner
Policy, Planning & Governance
Auckland Council

Tēnā koe Jess

Proposed Plan Change – Auckland Housing Planning Instrument

1. Auckland Council is proposing to withdraw Plan Change 78: Intensification (**PC78**) and introduce a plan change to give effect to the Resource Management (Consenting and Other System Changes) Amendment Act 2025 (**Amendment Act**).

2. The Tūpuna Maunga Authority (**Maunga Authority**) has consistently advocated for the protection of maunga viewshafts and height-sensitive areas as qualifying matters in plan changes to give effect to the National Policy Statement on Urban Development.

3. We appreciate the opportunity to engage with the Council on the replacement plan change. As part of this process, we have provided supporting information to assist with the section 32 evaluation report. This material draws on the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 and the Tūpuna Maunga Integrated Management Plan.

Noho ora mai
nā

Paul Majurey
Chair
Tūpuna Maunga Authority

Introduction

1. The Maunga Authority supports the Council position that the Maunga Viewshafts and Height Sensitive Areas Overlay (**the overlay**) is a qualifying matter where located within Policy 3 areas described in the National Policy Statement on Urban Development (**NPSUD**). Outside these areas, the Maunga Authority supports the overlay continuing to have precedent over building height and intensity.

2. The Tūpuna Maunga are a matter of national importance under sections 6(b), 6(e) and s(6f) of the Resource Management Act 1991 (**RMA**) that shall be recognised and provided for.

3. Existing provisions in the Auckland Unitary Plan Operative in Part (**AUP**) recognise and protect the many layers of significance of the Tūpuna Maunga that are of national importance. This includes the overlay restricting building height to protect views to maunga. Any plan change must retain and strengthen these provisions by modifying additional building height and density to the extent necessary to protect the Tūpuna Maunga.

4. PC78 recognised the overlay as a qualifying matter. In May 2025, the Council accepted the Independent Hearings Panel recommendations for the City Centre to retain the existing maunga viewshafts as a qualifying matter. Nothing has changed since that time that would justify a different position.

The overlay as a qualifying matter and planning constraint

5. The overlay is a qualifying matter under 3.32(1)(a) in the NPSUD as a matter of national importance under section 6 of the RMA for one or more of the following matters:

    a. outstanding natural features and landscapes to be protected from inappropriate subdivision, use, and development (s6(b);

    b. the relationship of Māori and their culture and traditions with their ancestral lands, waahi tapu, and taonga (s6(e)); and

    c. historic heritage places to be protected from inappropriate subdivision, use, and development (s6(f)).

6. The AUP recognises the protection of the maunga of Tāmaki Makaurau is an issue of regional significance. The AUP recognises that the relationship of mana whenua to the maunga is very important to their culture and traditions. Significant views to and between the maunga of Auckland from a range of publicly accessible locations are accordingly of great value to Auckland's identity and the quality of the environment and should be protected.[1]

[1] Regional Policy Statement (**RPS**) B4.1 Issues

7. The Tūpuna Maunga land[2] is also a qualifying matter under 3.32(1)(h) in the NPSUD by virtue of:

    a. its open space zoning[3];

    b. its classification under the Reserves Act 1977; and

    c. being held in trust for the common benefit of the iwi/hapū of Ngā Mana Whenua o Tāmaki Makaurau and the other people of Auckland[4].

8. The Tūpuna Maunga are among the most significant spiritual, cultural, historical, archaeological and geological landscapes in the Auckland region. This is recognised and provided for by the natural heritage, historic heritage and sites and places of significance to mana whenua overlays applying to the Tūpuna Maunga.

Treaty Settlement and acknowledgment

9. In 2014, following five years of Te Tiriti of Waitangi settlement negotiations, 14 Tūpuna Maunga[5] were transferred to the 13 iwi/hapū of Ngā Mana Whenua o Tāmaki Makaurau.[6] The Tūpuna Maunga are held in Trust for the benefit of these iwi/hapū and people of Auckland.

10. The Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 (**Collective Redress Act**):

    a. records that maunga are taonga in relation to which the iwi and hapū have always maintained a unique relationship and honoured their intergenerational role as kaitiaki; [7]

    b. restores ownership of certain maunga of Tāmaki Makaurau to the iwi and hapū, the maunga being treasured sources of mana to the iwi and hapū and providing mechanisms to exercise mana whenua and kaitiakitanga over the maunga;[8]

[2] Land included in Schedule 1 of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 and contiguous land where s110 applies

[3] Except for Rarotonga/Mount Smart

[4] Except for Rarotonga/Mount Smart

[5] The 14 Tūpuna Maunga owned by the 13 iwi/hapū of Ngā Mana Whenua o Tāmaki Makaurau via the Tūpuna Taonga o Tāmaki Makaurau Trust and the Crown owned reserve land administered by the Maunga Authority, being: Matukutūruru/Wiri Mountain; Maungakiekie/One Tree Hill; Maungarei/Mount Wellington; Maungauika/North Head; Maungawhau/Mount Eden; Ōhinerau/Mount Hobson; Ōhuiarangi/Pigeon Mountain; Ōtāhuhu/Mount Richmond; Ōwairaka/Te Ahi-kā-a-Rakataura/Mount Albert; Puketāpapa/Pukewīwī/Mount Roskill; Rarotonga/Mount Smart; Takarunga/Mount Victoria; Te Kōpuke/Tītīkōpuke/Mount St John; Te Tātua a Riukiuta/Big King. Te Pane-o-Mataaho /Te Ara Pueru/Māngere Mountain remains in Crown ownership.

[6] Ngāti Maru; Ngāti Pāoa; Ngāti Tamaoho; Ngāti Tamaterā; Ngāti Te Ata; Ngāti Whanaunga; Ngāti Whātua o Kaipara; Ngāti Whātua Ōrākei; Te Ākitai Waiohua; Te Kawerau ā Maki; Te Patukirikiri; hapū of Ngāti Whātua (other than Ngāti Whātua o Kaipara and Ngāti Whātua Ōrākei) whose members are beneficiaries of Te Rūnanga o Ngāti Whātua, including Te Taoū not descended from Tuperiri.

[7] Collective Redress Act, preamble (4)

[8] Collective Redress Act, s3

c. provides Crown acknowledgement of the importance to Ngā Mana Whenua o Tāmaki Makaurau of cultural activities on and traditional uses of the Tūpuna Maunga. This being integral to parts of the relationship with the maunga.[9]

11. Part 3 of the Collective Redress Act established the Maunga Authority as an independent statutory co-governance entity for the Tūpuna Maunga. The Maunga Authority reflects both the important relationship Mana Whenua have with these sacred places and their importance to, and connection with, all the peoples of Auckland. There is equal representation from mana whenua and Auckland Council on the Maunga Authority.

12. In exercising its powers and carrying out its functions under the Collective Redress Act, the Maunga Authority must have regard to the spiritual, ancestral, cultural, customary, and historical significance of the Tūpuna Maunga to Ngā Mana Whenua.[10]

Significance of Tūpuna Maunga to Ngā Mana Whenua o Tāmaki Makaurau

13. Ngā Mana Whenua o Tāmaki Makaurau have individual associations and relationships with the maunga. Any references to the significance of the Tūpuna Maunga to mana whenua is a general or collective sense.

14. The human occupation of Tāmaki Makaurau spans around 1,000 years. The tūpuna of the Māori people travelled here from Hawaiiki in the Pacific via ancestral kaitiaki (in the form of marine mammals and birds) and waka. The early peoples settled along the shores of the Manukau and Waitematā Harbours. Over the centuries there were several great tribal migrations into the region, including the iwi/hapū of Marutūāhu, Ngāti Whātua and Waiohua -Tāmaki.

15. The Tūpuna Maunga were strategically important areas. Pā were built on high ground with palisaded fortresses ringed with (still visible) terraces supporting housing, storage pits and large gardens which extended onto the surrounding fertile soils. History records the various battles and strategic alliances as various tribes sought influence over Tāmaki. The maunga were also places of unity and connection with births and marriages taking place on them, as well as being places of interment.

16. The Tūpuna Maunga were central to the daily lives of the tribes of Tāmaki as places of habitation, rituals of daily life and worship, the cultivation of food, and at times warfare. The tangible inscriptions of the tūpuna (ancestors) remain as seen, for example, in the modified terraced fortified pā, cultivated areas and stone features.

17. The significance of the relationship between Māori and maunga is succinctly described in the Waitangi Tribunal Tāmaki Makaurau Settlement Process Report.

> *…maunga are iconic landscape features for Māori. They are iconic not because of their scenic attributes, but because they represent an enduring symbolic connection between tangata whenua groups and distinctive land forms. Sometimes, these land forms are the physical embodiment of tūpuna. Thus, associations with maunga are imbued with mana and wairua that occupy the*

[9] Collective Redress Act, s65
[10] Collective Redress Act, s109

spiritual as well as the terrestrial realm. Maunga express a group's mana and identity. This connection and expression is an integral part of Māori culture.[11]

18. Within Tāmaki Makaurau the Tūpuna Maunga are part of the broader volcanic field of Ngā Tapuwae ō Mataaho.

> *Ngā Tapuwae ō Mataaho is an unmistakable Māori cultural landscape. The features and resources provided by the volcanic landscape support a long period of Māori settlement, use and occupation, from the earliest times of discovery and arrival. Just as importantly, Māori established relationships with the landscape which reflected a fundamental ethos of the Polynesian tradition – a sense of kinship between the human, physical and spiritual dimensions*.[12]

19. Fundamental to recognising and providing for section 6(f) of the RMA is an understanding Te Ao Māori or the Māori world view. This is the recognition of the inter-related connectedness between all life forces, living and non-living. Whanaungatanga, or kinship is central is Te Ao Māori.

> *Whanaungatanga does not refer to family ties between people, but rather to a much broader web of relationships between people (living and dead), land, water, flora and fauna, and the spiritual world of auta (gods) – all bound together through whakapapa. In this system of thought, a person's mauri or life force is intimately linked to the mauri of all others (human and non-human) to whom he or she is related. This explains why iwi referred to mountains, rivers, and lakes in the same way as they referred to other humans, and why elders feel comfortable speaking directly to them*. *…..*[13]

20. Thus, the relationship between traditional knowledge and landscapes is because of the close engagement between tangata and their environment.

> *There is no separation between the material and nonmaterial, the tangible and intangible. Interpreting a landscape in its entirety, therefore, requires an understanding of the relationships between people and their environment over time, and an understanding that sites are reference points of a cultural value system. Places must be understood within a specific cultural context, one that gives a certain mandate to present and future trustees to act and to manage places and associated knowledge systems. The concept, therefore, reminds living descendants of some parameters for interpreting places. Ancestral landscape stresses the practical aspect of spiritual values. The linkages between ancestor and spiritual values are not remote or obscure.*[14]

21. Maunga are intrinsically connected to Māori identity and well-being. They are a known landmark for mana whenua for whom their names are immediately recognisable as

[11] Waitangi Tribunal Tāmaki Makaurau Settlement Process Report, Wai 1362, page 95
[12] Ngā Tapuwae Ō Mataaho – Heritage Case for the nomination of the Auckland Volcanic Landscape as a World heritage property, Tim Walker, p10
[13] Waitangi Tribunal, Ko Aotearoa Tēnei – A Report into Claims Concerning New Zealand Law and Policy Affecting Māori Culture and Identity, Te Taumata Tuarua, p237
[14] Merata Kawharu – Ancestral Landscapes and World Heritage from a Māori Viewpoint, p327

symbols of their people. It is for this reason maunga are referred to in pepeha (introductions) being part of the story of the places and people Māori are connected to.

> *Together with other named features of the land – rivers, lakes, blocks of land, promontories, holes in the ground, fishing grounds, trees, burial places, and islands – they form a cultural grid over the land which provides meaning, order, and stability to human existence. Without the fixed grid of named features we would be total strangers on the land – lost souls with nowhere to attach ourselves.*[15]

22. Since the arrival of early European settlers, the maunga have been subject to confiscation, quarrying, and extensive development (particularly on the lower slopes). Taller buildings have been constructed intruding into views to and between maunga.

23. It is of upmost significance that what remains of the Tūpuna Maunga is protected, given they are fundamental to the relationship of Māori and their culture and traditions with their ancestral lands, waahi tapu, and taonga.

Tūpuna Maunga o Tāmaki Makaurau Integrated Management Plan

24. The Collective Redress Act requires the Maunga Authority prepare and approve an Integrated Management Plan (IMP).[16] The IMP sets the direction for protection, restoration and enhancement of the maunga.

25. The IMP recognises those values that make the Tūpuna Maunga unique and iconic. These values include section 6 of the RMA matters.

> *The Tūpuna Maunga are among the most significant spiritual, cultural, historical, archaeological and geological landscapes in the Auckland region. The Tūpuna Maunga are sacred to mana whenua as taonga tuku iho (treasures handed down the generations). Ngā Mana Whenua therefore secured the statutory requirement for an IMP to ensure the future of each of these treasured places will be organised with equal consideration and reverence.* [17]

> *They have come to be treasured and celebrated by all communities for their striking landscape and heritage features, the distinct identity and sense of place they inspire and their value as open spaces for all Aucklanders to be active, and for respite, relaxation and escape from busy urban lives.*[18]

26. The IMP sets out seven values with corresponding pathways to achieve the integrated outcomes for all the Tūpuna Maunga. The values provide the tika (correct) framework for the care and protection of the Tūpuna Maunga and the pathways elaborate and give tangible expression to the values.[19] The values identified are:

[15] Te Maori – Maori Art From New Zealand Collections, S.M. Mead, 1984, p20
[16] Collective Redress Act, s58
17 IMP, paragraph 1.12
[18] IMP, paragraph 1.15
[19] IMP, paragraph 1.15

a. Wairuatanga / Spiritual;

b. Mana Aotūroa / Cultural and Heritage;

c. Takotoranga Whenua / Landscape;

d. Mauri Pūnaha Hauropi / Ecology and Biodiversity;

e. Mana Hononga Tangata / Living Connection;

f. Whai Rawa Whakauka / Economic and Commercial; and

g. Mana Whai a Rēhia / Recreational

27. Wairuatanga value recognises that the Tūpuna Maunga are sacred places to mana whenua. They are taonga tuku iho (treasures handed down the generations) and inspire reverence and aroha. Among the pathways to achieving this are to reconnect mana whenua to their stories, traditions and history on the maunga; the importance of the maunga as sites of cultural and spiritual significance to mana whenua is recognised and the relationship between the tangata and the whenua is restored.[20] A key part of this to preserve and enhance the authenticity and visual integrity of the Tūpuna Maunga so that they are markers in the landscape, and their cultural and natural features are visually apparent.

28. Takotoranga Whenua value is significant to the protection of views to and between maunga, including as recognised and protected by the AUP overlay.

> *The Tūpuna Maunga are among the most treasured and distinctive connected landscape features of Tāmaki Makaurau that are both natural and modified. The Tūpuna Maunga create and contribute to Aucklanders sense of pride, 'place' and home.*
>
> *The ability to view these taonga from all over Auckland – the most populated part of New Zealand – and from other maunga is valued for this reason. The Tūpuna Maunga are a place to see and experience other parts of Tāmaki Makaurau.*
>
> *The significance of the Tūpuna Maunga to mana whenua and all Aucklanders creates an opportunity to ensure the protection and enhancement of the physical and visual integrity of these natural features in the surrounding urban environment. Their significance includes the distinctive and impressive earthworks such as terracing, rua (storage pits), and defences, which are characteristic of pā on the maunga. These reflect the extent and nature of past use and occupation of the Tūpuna Maunga by mana whenua, and are of exceptional archaeological significance both nationally and internationally.*

[20] IMP, pages 61-63

Maunga Viewshafts and Height Sensitive Areas Overlay

29. In their report to the Auckland Council on the Volcanic Viewshafts and Height Sensitive Areas Overlay (**HSA**), the Auckland Independent Hearings Panel stated:

> *The network of volcanic maunga are a unique and defining feature of Auckland.* [s6(b)] *They are also a significant taonga for Mana Whenua and the Panel is required to provide for the relationships of Mana Whenua with their maunga.* [s6(f)][21]

30. RPS B4.3.1 Viewshafts objectives are:

> *(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.*
>
> *(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.*

31. RPS policies B4.3.2 set out how to identify, evaluate and protect viewshafts to and between the maunga.[22] They also include policy to protect the maunga to control development that could encroach into views and erode their significance.[23] These policies refer to viewshafts and height sensitive areas around the flanks of the maunga.

32. The HSA is not a 'lesser' form of protection than the viewshafts i.e., not a s6(b) and s6(f) matter. Both are complementary, collectively providing minimum protection of the Tūpuna Maunga.

33. The tihi is the most sacred part of the maunga to mana whenua. The volcanic viewshafts capture selected views of the tihi from the points of origin. HSA's are critical to retaining the profile and integrity of the maunga. This gives meaning to the landmark and its individual qualities, making it immediately recognisable to mana whenua. The HSA can also protect visual evidence of mana whenua occupation of the maunga, showing far more than can be seen from the viewshafts point of origin.

34. Any additional building height and density, including beyond the HSA overlay, that diminishes the protection of the Tūpuna Maunga is contrary to s6 of the RMA. It would also be contrary to s8 of the RMA as it would fail to take into account Te Tiriti o Waitangi and the Collective Redress Act.

[21] AIHP Report to AC Topic 020 Viewshafts, 3.2.1
[22] Policies B4.3.2(1), (2) and (3)
[23] Policy B4.3.2(4)

Appendix C - Existing Overlay Provisions

D14. Maunga Viewshafts and Height Sensitive Areas Overlay

D14.1. Overlay description

The purpose of the Maunga Viewshafts and Height Sensitive Areas Overlay is to appropriately protect significant views of Auckland's maunga cones through the use of viewshafts and height sensitive areas. The maunga viewshafts and height sensitive areas are identified on the planning maps.

This overlay contributes to Auckland's unique identity by protecting the natural and cultural heritage values of significant maunga cones.

This overlay incorporates three elements:

(1) Regionally significant maunga viewshafts which protect regionally significant views to the Auckland maunga. Buildings that intrude into a regionally significant maunga viewshaft require restricted discretionary activity consent up to 9m in height, beyond which they are a non-complying activity.

(2) Locally significant maunga viewshafts manage development to maintain locally significant views to the Auckland maunga. Buildings that intrude into a locally significant maunga viewshaft are a permitted activity up to 9m in height, beyond which they are a restricted discretionary activity.

(3) Height sensitive areas are areas of land located on the slopes and surrounds of the maunga cones. These areas are mapped and are identified as a layer on the planning maps and are marked with the following symbol: ▼.

Height sensitive areas enable reasonable development in areas where the floor of the viewshaft is less than 9m (the maximum height in Residential – Single House Zone and Residential – Mixed Housing Suburban Zone). They also ensure that development is of a scale and/or location that does not dominate the local landscape or reduce the visual significance or amenity values of the maunga feature. Buildings are a permitted activity up to a defined maximum height beyond which they are a non-complying activity. An additional height control applies at the boundary of a maunga feature.

D14.2. Objectives [rcp/dp]

(1) The regionally significant views to and between Auckland's maunga are protected.

(2) The locally significant views to Auckland's maunga are managed to maintain and enhance the visual character, identity and form of the maunga in the views.

PC 78 (see Modifications)

[new text to be inserted]

D14.3. Policies [rcp/dp]

(1) Protect the visual character, identity and form of regionally significant maunga, together with local views to them, by:

(a) locating height sensitive areas around the base of the maunga;

(b) imposing height limits which prevent future encroachment into views of the maunga that would erode the visibility to their profile and open space values, while allowing a reasonable scale of development.

(2) Manage subdivision, use and development to ensure that the overall contribution of the regionally significant maunga scheduled as outstanding natural features to the landscape of Auckland is maintained and where practicable enhanced, including by protecting physical and visual connections to and views between the maunga.

(3) Protect the historic, archaeological and cultural integrity of regionally significant maunga features and their surrounds by avoiding activities that detract from these values and the mana of the maunga.

(4) Avoid new buildings or structures that intrude into maunga viewshafts scheduled in Schedule 9 Maunga Viewshafts Schedule, except:

(a) where they would have no adverse effect on the visual integrity of the maunga as seen from the identified viewing point or line; or

(b) to allow development up to a two-storey height to intrude into a maunga viewshaft, where any adverse effect of development is avoided or mitigated; or

(c) to allow development located within an identified height sensitive area up to defined appropriate height limits; or

(d) to allow the provision of infrastructure where there are particular functional or operational needs that necessitate a structure that penetrates the floor of a maunga viewshaft, there is no reasonably practicable alternative and adverse effects of development are avoided or mitigated.

(5) Avoid new buildings or structures that exceed two storeys in height in a height sensitive area, except where they would have no adverse effect on the visual integrity of any maunga to which that height sensitive area relates, as seen from any public place.

PC 78 (see Modifications)

[new text to be inserted]

(6) Require urban intensification to be consistent with the protection of maunga features and viewshafts.

D14.4. Activity table [rcp/dp]

Table D14.4.1 specifies the activity status of land use and development activities in the Maunga Viewshafts and Height Sensitive Areas Overlay pursuant to sections 9(3) and 12 of the Resource Management Act 1991.

- The rules that apply to network utilities and electricity generation in the Maunga Viewshafts and Height Sensitive Areas Overlay are located in Section E26 Infrastructure.

Table D14.4.1 Activity table

Activity		Activity status	
Buildings (where they intrude into a scheduled maunga viewshaft), excluding network utilities, electricity generation facilities, broadcasting facilities and road networks			
		Regionally Significant Maunga Viewshaft	**Locally Significant Maunga Viewshaft**
(A1)	Buildings that do not intrude into a viewshaft scheduled in Schedule 9 Maunga Viewshafts Schedule	P	P
(A2)	Temporary activities	P	P
(A3)	Buildings, except for fences and walls, up to 9m in height	RD	P
(A4)	Fences and walls, where their height does not exceed 2.5m	RD	P
(A5)	Towers associated with fire stations operated by Fire and Emergency New Zealand that are no higher than the height allowed as a permitted activity in the zone.	RD	P
(A6)	Buildings not otherwise provided for or that do not comply with the standards under D14.6	NC	RD
Buildings in a height sensitive area, excluding network utilities, electricity generation facilities, broadcasting facilities and road networks			
(A7)	Buildings up to 9m in height except as specified in Standard D14.6.3.	P	
[new text to be inserted]	**[new text to be inserted]**	**[new text to be inserted]**	
(A8)	Buildings up to 13m in height in the areas identified in Figure D14.10.1	P	
(A9)	Temporary activities	P	
(A10)	Towers associated with fire stations operated by Fire and Emergency New Zealand that are no higher than the height allowed as a permitted activity in the zone	RD	
(A11)	Buildings not otherwise provided for or that do not comply with the standards	NC	

PC 78 (see Modifications)

PC 78 (see Modifications)

D14.5. Notification

(1) Any application for resource consent for any of the following non-complying activities must be publicly notified:

(a) D14.4.1(A6) Buildings not otherwise provided for or that do not comply with the standards (non-complying only); and

(b) D14.4.1(A11) Buildings not otherwise provided for or that do not comply with the standards.

(2) Any application for resource consent for an activity listed in Table D14.4.1 Activity table and which is not listed in D14.5(1) above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(3) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

D14.6. Standards

All activities listed as permitted and restricted discretionary in Table D14.4.1 must comply with the following standards.

D14.6.1. Height

(1) In applying these standards, height must be measured using the rolling height method except if using standards D14.6.3(1)(a)(i), D14.6.3(1)(a)(iii) and D14.6.3(1)(c) where maximum height is restricted by another method.

(2) Flagpoles, masts, lighting poles, chimneys and water overflow pipes must not exceed 300mm in any horizontal cross-sectional dimension and must be located at least 10m from any other flagpole, mast, lighting pole, chimney or water overflow pipe.

(3) Except for guy wires and chain link or other open or transparent fences, the list of exclusions in the plan's definition of height do not apply.

D14.6.2. Buildings and structures that do not intrude into a viewshaft scheduled in Schedule 9 Maunga Viewshafts Schedule

(1) Compliance must be confirmed by a report from a registered surveyor that the building does not intrude into the scheduled viewshaft (from the identified viewpoint or line) because of the presence of landform. The presence of existing vegetation is not to be taken into account when confirming compliance and the report shall include identification of the landform used to confirm compliance.

D14.6.3. Buildings on sites that have a contiguous boundary with a site with a maunga feature mapped as an outstanding natural feature

(1) Buildings on sites that have a contiguous boundary with a site with a maunga feature mapped as an outstanding natural feature must not exceed a height of:

(a) the height sensitive area maximum of 9m except where the lesser height of the following applies;

(i) the average height above NZVD2016 of the highest points of the nearest two buildings (not including accessory buildings) on adjoining sites where those sites also have contiguous boundary with the maunga feature; or

(ii) *[deleted]*

(iii) where D14.6.3(1)(a)(i) cannot be applied, the average height above NZVD2016 of the site boundary which is contiguous with the maunga feature. Average height will be calculated using the average of measurements of height above NZVD2016, taken along the contiguous boundary at 1m intervals.

(b) 7.3m for buildings on 14A Pickens Crescent Mt Albert (Lot 1 DP 394305; CT 377258); or

(c) RL (in terms of NZVD2016) 103.08 for buildings on 47A Mount St John Avenue Epsom (Lot 1 DP 359371; CT 241868).

D14.6.4. Temporary construction and safety structures (other than in Business – City Centre Zone)

(1) Temporary construction and safety structures must be removed within 30 days or upon completion of the construction works, whichever is the lesser.

D14.6.4A Temporary construction and safety structures (Business - City Centre Zone Only)

(1) Temporary construction and safety structures must be removed within 24 months or upon completion of the construction works, whichever is the lesser.

(2) Temporary construction and safety structures that are in place for greater than 30 days must:

(a) Not display any sign except signs required for health, safety or operational requirements;

(b) Only display lighting that is limited to that necessary to comply with safety or civil aviation requirements; and

(c) Be non-reflective and have a matte finish.

D14.7. Assessment – controlled activities

D14.7.1. Matters of control

There are no controlled activities in this overlay.

D14.8. Assessment – restricted discretionary activities

D14.8.1. Matters of discretion

The Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application:

(1) all restricted discretionary activities:

(a) effects on the visual integrity of the view of the maunga from the identified viewing point or line;

(b) location, nature, form and extent of proposed works;

(c) mana whenua values associated with the maunga; and

PC 78 (see Modifications)

(d) the functional or operational need for the proposal and any alternatives considered to fulfil that need without the intrusion into the viewshaft or exceeding the maximum height limit of a height sensitive area.

[new text to be inserted]

D14.8.2. Assessment criteria

The Council will consider the relevant assessment criteria for restricted discretionary activities from the list below:

(1) all restricted discretionary activities:

(a) having regard to the viewshaft or height sensitive area statement in Appendix 20 Maunga Viewshafts and Height Sensitive Areas – Values Assessments, whether the nature, form and extent of the building adversely affects the visual integrity of the maunga;

(b) whether the proposed building has a functional or operational requirement to be in the location proposed and the proposed height of the building is consistent with that requirement;

PC 78 (see Modifications)

(c) whether there are practicable alternatives available that will not intrude into, or will minimise the intrusion into the viewshaft or exceedance of the maximum height of a height sensitive area;

(d) whether the proposed building will impact on Mana Whenua values associated with the maunga; and

(e) the relevant objectives and policies in B4.3, D14.2 and D14.3

PC 78 (see Modifications)

[new text to be inserted]

D14.9. Special information requirements

There are no special information requirements in this overlay.

D14.10. Figures

PC 78 (see Modifications)

Figure D14.10.1 Devonport Height Sensitive Area height

Appendix D - Proposed Overlay Provisions

D14. Maunga Viewshafts and Height and Building Sensitive Areas Overlay

D14.1. Overlay description

The purpose of the Maunga Viewshafts and Height and Building Sensitive Areas Overlay is to appropriately protect significant views of Auckland's maunga cones through the use of viewshafts and height and building sensitive areas. The maunga viewshafts and height and building sensitive areas are identified on the planning maps.

This overlay contributes to Auckland's unique identity by protecting the natural and cultural heritage values of significant maunga cones.

This overlay incorporates three elements:

(1) Regionally significant maunga viewshafts which protect regionally significant views to the Auckland maunga. Buildings that intrude into a regionally significant maunga viewshaft require restricted discretionary activity consent up to 9m in height, beyond which they are a non-complying activity.

(2) Locally significant maunga viewshafts manage development to maintain locally significant views to the Auckland maunga. Buildings that intrude into a locally significant maunga viewshaft are a permitted activity up to 9m in height, beyond which they are a restricted discretionary activity.

(3) Height and building sensitive areas are areas of land located on the slopes and surrounds of the maunga cones. These areas are mapped and are identified as a layer on the planning maps and are marked with the following symbol: ▼.

Height and building sensitive areas enable reasonable development in areas where the floor of the viewshaft is less than 9m (the maximum height in Residential – Single House Zone and Residential – Mixed Housing Suburban Zone). They also ensure that development is of a scale and/or location that does not dominate the local landscape or reduce the visual significance or amenity values of the maunga feature. Buildings are a permitted activity up to a defined maximum height beyond which they are a non-complying activity. An additional height control applies at the boundary of a maunga feature.

D14.2. Objectives [rcp/dp]

(1) The regionally significant views to and between Auckland's maunga are protected.

(2) The locally significant views to Auckland's maunga are managed to maintain and enhance the visual character, cultural significance, identity and form of the maunga in the views.

~~PC 78 (see Modifications)~~

[new text to be inserted]

(3) The height and building sensitive areas are managed to protect the visual character, cultural significance, identity, physical integrity and form of the maunga.

D14.3. Policies [rcp/dp]

(1) Protect the unique visual character, cultural significance, identity, physical integrity and form of regionally significant maunga, together with local views to them, by:

(a) locating height and building sensitive areas around the base of the maunga; and

(b) imposing height and built form limits which prevent future encroachment into views of the maunga that would erode the visibility to their profile and open space values, and cultural values, while allowing a reasonable scale of development.;

(c) minimising earthworks and retaining walls;

(d) within residential zones, limiting building coverage and landscaped area and ensuring separation of buildings to maintain and enhance visual permeability to the slopes of the maunga; and

(e) respecting the maunga as sacred places to mana whenua.

(2) Manage subdivision, use and development to ensure that the overall contribution of the regionally significant maunga scheduled as outstanding natural features to the landscape of Auckland is maintained and where practicable enhanced, including by protecting physical and visual connections to and views between the maunga.

(3) Protect the historic, archaeological and cultural integrity of regionally significant maunga features and their surrounds by avoiding activities that detract from these values and the mana of the maunga.

(4) Avoid new buildings or structures that intrude into maunga viewshafts scheduled in Schedule 9 Maunga Viewshafts Schedule, except:

(a) where they would have no adverse effect on the visual integrity of the maunga as seen from the identified viewing point or line; or

(b) to allow development up to a two-storey height to intrude into a maunga viewshaft, where any adverse effect of development is avoided or mitigated; or

(c) to allow development located within an identified height and building sensitive area up to defined appropriate height limits; or

(d) to allow the provision of infrastructure where there are particular functional or operational needs that necessitate a structure that penetrates the floor of a maunga viewshaft, there is no reasonably practicable alternative and adverse effects of development are avoided or mitigated.

(5) Avoid new buildings or structures that exceed two storeys in height in a height and building sensitive area, except where they would have no adverse effect on the visual integrity of any maunga to which that height and building sensitive area relates, as seen from any public place.

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~~[new text to be inserted]~~

(6) Require urban intensification to be consistent with the protection of maunga features and viewshafts.

D14.4. Activity table [rcp/dp]

Table D14.4.1 specifies the activity status of land use and development activities in the Maunga Viewshafts and Height and Building Sensitive Areas Overlay pursuant to sections 9(3) and 12 of the Resource Management Act 1991.

- The rules that apply to network utilities and electricity generation in the Maunga Viewshafts and Height and Building Sensitive Areas Overlay are located in Section E26 Infrastructure.

Table D14.4.1 Activity table

Note: Where a site is subject to both a Maunga Viewshaft and a Height and Building Sensitive Area, and where the height as limited by the Maunga Viewshaft is lower than the permitted height in the Height and Building Sensitive Area, Rule D14.4.1 (A7) applies and Rule D14.4.1 (A3) does not apply.

Activity		Activity status	
Buildings (where they intrude into a scheduled maunga viewshaft), excluding network utilities, electricity generation facilities, broadcasting facilities and road networks			
		Regionally Significant Maunga Viewshaft	**Locally Significant Maunga Viewshaft**
(A1)	Buildings that do not intrude into a viewshaft scheduled in Schedule 9 Maunga Viewshafts Schedule	P	P
(A2)	Temporary activities	P	P
(A3)	Buildings, except for fences and walls, up to 9m in height	RD	P
(A4)	Fences and walls, where their height does not exceed 2.5m	RD	P
(A5)	Towers associated with fire stations operated by Fire and Emergency New Zealand that are no higher than the height allowed as a permitted activity in the zone.	RD	P
(A6)	Buildings not otherwise provided for or that do not comply with the standards under D14.6.1, D14.6.3, D14.6.4	NC	RD

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Buildings in a height and building sensitive area, excluding network utilities, electricity generation facilities, broadcasting facilities and road networks		
(A7)	Buildings up to 9m in height except as specified in Standard D14.6.3.	P
~~[new text to be inserted]~~	~~[new text to be inserted]~~	~~[new text to be inserted]~~
(A7A)	Buildings that do not comply with standard D14.6.5 Building coverage*	RD
(A7B)	Buildings that do not comply with standard D14.6.6 Landscaped area*	RD
(A7C)	Buildings not complying with underlying zone Yards standards*	RD
(A7D)	Buildings that do not comply with standard D14.6.7 Earthworks*	RD
(A8)	Buildings up to 13m in height in the areas identified in Figure D14.10.1	P
(A9)	Temporary activities	P
(A10)	Towers associated with fire stations operated by Fire and Emergency New Zealand that are no higher than the height allowed as a permitted activity in the zone	RD
(A11)	Buildings not otherwise provided for or that do not comply with the standards	NC

* These standards do not apply in the Bucklands Beach Height and Building Sensitive Area

D14.5. Notification

(1) Any application for resource consent for any of the following non-complying activities must be publicly notified:

(a) D14.4.1(A6) Buildings not otherwise provided for or that do not comply with the standards (non-complying only); and

(b) D14.4.1(A11) Buildings not otherwise provided for or that do not comply with the standards.

(2) Any application for resource consent for an activity listed in Table D14.4.1 Activity table and which is not listed in D14.5(1) above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(3) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

D14.6. Standards

All activities listed as permitted and restricted discretionary in Table D14.4.1 must comply with the following standards.

D14.6.1. Height

(1) In applying these standards, height must be measured using the rolling height method except if using standards D14.6.3(1)(a)(i), D14.6.3(1)(a)(iii) and D14.6.3(1)(c) where maximum height is restricted by another method.

(2) Flagpoles, masts, lighting poles, chimneys and water overflow pipes must not exceed 300mm in any horizontal cross-sectional dimension and must be located at least 10m from any other flagpole, mast, lighting pole, chimney or water overflow pipe.

(3) Except for guy wires and chain link or other open or transparent fences, the list of exclusions in the plan's definition of height do not apply.

D14.6.2. Buildings and structures that do not intrude into a viewshaft scheduled in Schedule 9 Maunga Viewshafts Schedule

(1) Compliance must be confirmed by a report from a registered surveyor that the building does not intrude into the scheduled viewshaft (from the identified viewpoint or line) because of the presence of landform. The presence of existing vegetation is not to be taken into account when confirming compliance and the report shall include identification of the landform used to confirm compliance.

D14.6.3. Buildings on sites that have a contiguous boundary with a site with a maunga feature mapped as an outstanding natural feature

(1) Buildings on sites that have a contiguous boundary with a site with a maunga feature mapped as an outstanding natural feature must not exceed a height of:

(a) the height and building sensitive area maximum of 9m except where the lesser height of the following applies;

(i) the average height above NZVD2016 of the highest points of the nearest two buildings (not including accessory buildings) on adjoining sites where those sites also have contiguous boundary with the maunga feature; or

(ii) *[deleted]*

(iii) where D14.6.3(1)(a)(i) cannot be applied, the average height above NZVD2016 of the site boundary which is contiguous with the maunga feature. Average height will be calculated using the average of

measurements of height above NZVD2016, taken along the contiguous boundary at 1m intervals.

(b) 7.3m for buildings on 14A Pickens Crescent Mt Albert (Lot 1 DP 394305; CT 377258); or

(c) RL (in terms of NZVD2016) 103.08 for buildings on 47A Mount St John Avenue Epsom (Lot 1 DP 359371; CT 241868).

D14.6.4. Temporary construction and safety structures ~~(other than in Business – City Centre Zone)~~

~~(1) Temporary construction and safety structures must be removed within 30 days or upon completion of the construction works, whichever is the lesser.~~

~~D14.6.4A Temporary construction and safety structures (Business - City Centre Zone Only)~~

(1) Temporary construction and safety structures must be removed within 24 months or upon completion of the construction works, whichever is the lesser.

(2) Temporary construction and safety structures that are in place for greater than 30 days must:

(a) Not display any sign except signs required for health, safety or operational requirements;

(b) Only display lighting that is limited to that necessary to comply with safety or civil aviation requirements; and

(c) Be non-reflective and have a matte finish.

The following Standards D14.6.5 – D14.6.8 apply only to buildings in Residential Zones within the Height and Building Sensitive Areas Overlay.

D14.6.5. Building coverage

Purpose: To protect the visual character, cultural significance, identity, physical integrity and form of the maunga when viewed from public places by maintaining the relationship of built form to open space and landscape context.

(1) Within Height and Building Sensitive Areas the maximum building coverage is 35 per cent of the net site area.

D14.6.6. Landscaped area

Purpose: To protect the visual character, cultural significance, identity, physical integrity and form of the maunga when viewed from public places by maintaining the relationship of built form to open space and landscape context.

(1) Within Height and Building Sensitive Areas the minimum landscaped area must be at least 40 per cent of the net site area.

D14.6.7. Earthworks

Purpose: To protect the visual character, cultural significance, identity, physical integrity and form of the maunga

(1) Within Height and Building Sensitive Areas Land Disturbance shall comply with E12.4.2 (A32) and (A33)

D14.7. Assessment – controlled activities

D14.7.1. Matters of control

There are no controlled activities in this overlay.

D14.8. Assessment – restricted discretionary activities

D14.8.1. Matters of discretion

The Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application:

(1) all restricted discretionary activities:

(a) effects on the visual integrity of the view of the maunga from the identified viewing point or line;

(b) location, nature, form and extent of proposed works;

(c) mana whenua values associated with the maunga; and

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(d) the functional or operational need for the proposal and any alternatives considered to fulfil that need without the intrusion into the viewshaft or exceeding the maximum height limit of a height and building sensitive area.

~~[new text to be inserted]~~

(2) Buildings in Residential Zones not complying with standards D14.6.5 Building coverage; D14.6.6 Landscaped area; D14.6.7 Earthworks or underlying zone Yard standards:

(a) Cultural values associated with the maunga;

(b) The unique visual character, identity, physical integrity and form of the maunga.

D14.8.2. Assessment criteria

The Council will consider the relevant assessment criteria for restricted discretionary activities from the list below:

(1) all restricted discretionary activities:

(a) having regard to the viewshaft or height and building sensitive area statement in Appendix 20 Maunga Viewshafts and Height and Building

Sensitive Areas – Values Assessments, whether the nature, form and extent of the building adversely affects the visual integrity of the maunga;

(b) whether the proposed building has a functional or operational requirement to be in the location proposed and the proposed height of the building is consistent with that requirement;

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(c) whether there are practicable alternatives available that will not intrude into, or will minimise the intrusion into the viewshaft or exceedance of the maximum height of a height and building sensitive area;

(d) whether the proposed building will impact on Mana Whenua values associated with the maunga; and

(e) the relevant objectives and policies in B4.3, D14.2 and D14.3

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~~**[new text to be inserted]**~~

(2) Buildings in Residential Zones not complying with standards D14.6.5 Building coverage; D14.6.6 Landscaped area; D14.6.7 Earthworks or underlying zone Yards standards:

(a) Policy D14.3 (1)

(b) Policy D14.3 (2)

(c) Policy D14.3 (3)

(d) Policy D14.3 (6)

D14.9. Special information requirements

There are no special information requirements in this overlay.

D14.10. Figures

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Figure D14.10.1 Devonport Height and Building Sensitive Area height

Appendix E - Updated Report from Stephen Brown

b r o w n

LANDSCAPE REPORT

REVIEW OF MAUNGA VIEWSHAFTS: E06, E10, E16, E18, E19, E20, K01, K02, O10, T08, W06 & W13, A13

Prepared For:

Auckland Council

Brown NZ Ltd
September 2025

1. Introduction

This report responds to the following brief from Auckland Council to:

1) *Review the degree to which Maunga Viewshafts (MVs) E10, E16 and E20 might be modified to accommodate greater building height and intensity within and around Auckland's CBD, while maintaining the integrity of the views protected by the MVs to Maungawhau – Mt Eden; and*

2) *Re-evaluation of MVs E06, E19, K1, K2, O10, T08, W06 and W13, which were recommended for possible removal or modification in 2015 (in the course of addressing submissions to the Draft AUP), to ascertain whether they should still be retained.*

3) *The additional review of MVs E18 and A13 to ascertain if they should be retained.*

This review has been undertaken by Stephen Brown (Brown NZ Limited) and Stephen Quin (Tāmaki Makaurau Design Ope, Auckland Council). It has involved:

- A review of the photos and values identified for the subject MVs in Appendix 20 of the AUP;
- Site visits to the origin points of those same MVs;
- Photography of the MVs; and
- A joint review of the MVs, their values, and options for the modification of some of them – employing site visits and photos taken in the course of that field work (**Figures 1-22**, appended to this report).

2. Analysis

The following summaries address each MV in turn, discussing key issues identified in relation to the retention and/or 'reshaping' of the MVs. Each summary also references the attached Figure or Figures relevant to the individual MV. It should be noted that these summaries only revisit the values identified in the Appendix 20 analyses for specific MVs where the situation has changed since 2015 and/or an error appears to have been made in relation to their values and significance.

The following summaries have not had input from mana whenua or Tupuna Maunga Authority. It is understood that is part of the full plan review process in developing the next generation AUP that mana whenua and the Tupuna Maunga Authority will be engaged with and will collaborate on the review of all viewshafts. The full review of viewshafts is not considered to be within the scope of this plan change.

E10 Maungawhau – Mt Eden (Figures 1-7)**:**

The introductory sequence of views to Maungawhau-Mt Eden, the central city, and the Waitematā Harbour, remains highly important as an 'introductory' statement about the city of Auckland and its

place amid both a volcanic field and two harbours. Linked to the Harbour Bridge, the main northern gateway to Auckland, the message imparted by this sequence of views is both eloquent and important: it remains a key part of Auckland-Tamaki Makaurau's signature. Even so, the situation in relation to different parts of this view is complex, as the viewshaft now addresses views from parts of the Northern Motorway and Onewa Road interchange:

- Part of the motorway north of the interchange (Figures 1 and 5);
- Part of the motorway and harbour bridge approach south of the Onewa Road interchange (Figures 2, 3 and 6); and from
- Onewa Road as it traverses the motorway and descends to merge with it (Figures 4 and 7).

Importantly, although the Onewa Road overbridge now bisects MV E10, the on-ramp to the motorway sits within the viewshaft and offers its own sequence of views to Maungawhau-Mt Eden. Having said this, it is equally clear that the over-bridge interferes with views from the Northern Motorway to the maunga, and this interference is exacerbated by the planting that extends southwards from the foot of the overbridge piles and its stormwater basin. Other factors also affect perception of the maunga and are significant in terms of its relationship with the city and harbour:

1) The interplay between the CBD and Maungawhau-Mt Eden is arguably at its most powerful at the northern end of the viewshaft – as the maunga emerges from behind the Auckland Council building and Sky Tower, and is directly juxtaposed with both.

2) Views from the motorway, south of the Onewa Road interchange, are just as clear, but are also more subject to interference from the aforementioned planting, two of the three signage gantries between the interchange and harbour bridge, and traffic on the Onewa Road slip lanes onto the motorway. These interrupt the sequence of views south of the Onewa Road interchange and dilute some of the focus on the maunga.

3) Views from the Onewa Road on-ramp, as it turns southwards, are slightly more elevated than those from the motorway proper and offer clear views of Maungawahu-Mt Eden once clear of the guardrail and scattered vegetation next to the interchange.

Consequently, much as the northern section of E10 offers the shortest sequence of views to the maunga before the interchange, those views remain meaningful in terms of capturing Maungawahu-Mt Eden's relationship with the central city and harbour. At the same time, the retention of E10 'as is' has the advantage of protecting views from the Onewa on-ramp that are also important in this regard.

These factors, together with the slightly truncated nature of the sequence of views between the interchange and harbour bridge, suggest that MV E10 should remain as it is presently defined in the AUP.

In addition to these points, a site visit has also been undertaken to the crest of Maungawhau-Mt Eden and the elevated viewing platform directly north of the crater, which is a real focus for tourist and visitor activity. Looking northwards from this lookout, it is clear that the E10 viewshaft also helps to protect

views back to the Waitematā Harbour, the bridge and its 'landing point' on the North Shore (see photo overleaf). Reducing the extent of this view would unquestionably diminish some of the visual interplay between these 'features' and the inner city, including the CBD's concentration of towers anchored by Sky Tower – which also makes a powerful statement about the interaction between the city's man-made development and key components of its natural heritage.

View back towards the MV E10 origin point on the Northern Motorway

E16 Maungawhau – Mt Eden (Figures 8 & 9)**:**

Traversing the harbour bridge between the southern tip of Northcote Point and the bridge approach to Westhaven and Shelly Beach Road, expansive views are offered of the Waitematā Harbour, Westhaven Marina, the central city and Maungawhau-Mt Eden. The maunga is a central feature of these views that rises clearly above the matrix of existing development on the Karangahape Road and Symonds Street ridgelines. Indeed, the height limits associated with the MVs to Maungawhau-Mt Eden are now clearly reflected in the flat-topped nature of much of the development visible below the maunga's main crown, which tends to emphasise its presence (captured in the centre photo of Figure 8). None of these views are more or less important than the others captured by E16, as the maunga is central to all of them, and they all highlight the interplay between the central city (and its margins) with Maungawhau-Mt Eden.

This visual interaction between the city's built and natural elements also makes an important statement about Auckland's origins (including its volcanic morphology), its cultural history and its present-day character. Consequently, there is no landscape basis for removing part of the current E16 viewshaft. This would only reduce its impact and meaning.

In addition to the above analysis, Figure 9 shows Maungawhau-Mt Eden with firstly two storeys, then four storeys, of development added to the viewshaft 'base plate' (and height limit) in front of the maunga. The two-storey addition would subtly, but noticeably, reduce the extent of the maunga's

grassed / reserve area, which is important in terms of separating it from surrounding development and articulating its form, while the four-storey addition would have a more obvious impact, severely diminishing the maunga's profile and value as an Outstanding Natural Feature.

Ultimately, though, both 'additions' would adversely affect the maunga's integrity by reducing its profile, visual legibility and presence. As such, neither change is supported from a landscape standpoint.

E19 Maungawhau – Mt Eden (Figure 10)**:**

The E19 viewshaft captures a sequence of close-up views to Maungawhau-Mt Eden from the Southern Motorway as it heads south over Khyber Pass Road and continues to approach the Gillies Avenue junction. As shown in Figure 10, these views extend out over existing development on Khyber Pass Road, but then, approaching the Mountain Road overbridge, are increasingly interrupted by the older wings of Mt Eden Prison, then obscured by its newer wings, one of which directly abuts the motorway. In the past, the alignment of the Southern Motorway – almost towards the maunga, then past its eastern side – together with the maunga's close proximity, contributed to spectacularly direct and open views of Maungawhau-Mt Eden. However, the sequence was dramatically curtailed with the construction of the more recent prison wings. As a result, the sequence of views captured by E19 is now 'cut short' as the motorway approaches the Gillies Avenue interchange.

Even so, the view from the motorway remains important. It has long affirmed the symbolic connection between the prison and Maungawhau-Mt Eden, and it offered spectacular views of the maunga's lower cone apron, then main tuff ring, prior to development of the wing closest to the motorway. In the long term, it remains a highly significant viewshaft that may well 'outlive' Mt Eden Prison.

As such, it is considered that E19 viewshaft should be retained and delineated in accordance with the AUP.

E20 Maungawhau – Mt Eden (Figures 11 & 12)**:**

The view from the intersection of Ponsonby Road and Karangahape-Great North Road to Maungawhau-Mt Eden captures a moderately close-up perspective of the maunga, in which both the main cone and tuff ring, and the maunga's lower (northern) crater are clearly defined and articulated. At the same time, a dense mantle of mostly native vegetation 'picks' out its lower and middle slopes from surrounding development. As a result, the maunga is a commanding presence on the south-eastern skyline, between commercial premises that fall away from Karangahape Road and Ponsonby Road into Newton Gully and other development that is spread out across both the Kingsland ridge and Maungawhau-Mt Eden's lower slopes.

This remains an important perspective of Maungawhau-Mt Eden and it is considered that this important view should be retained as identified in the AUP.

In addition, Figure 13, shows two storeys, then four storeys, of development added to the viewshaft 'base plate' (and height control) in front of the maunga. This shows that two storeys of additional development would appreciably reduce both the maunga's profile and its visual presence relative to the

development around it. Maungawhau-Mt Eden's visual primacy would be significantly diminished. The addition of yet two more storeys to the area above the viewshaft base plate would exacerbate this situation, to the point where the maunga would lose much of geomorphic profile, its visual presence and its meaning.

Both 'additions' would significantly erode Maungawhau-Mt Eden's value and integrity. Accordingly, neither is considered appropriate from a landscape standpoint.

E06 Maungawhau – Mt Eden (Figure 13)**:**

MV E06 originates on the second storey verandah of Alberton, an historic house, managed by Heritage New Zealand - Rārangi Kōrero, that is located on an elevated property next to Mt Albert Road, looking eastward towards Maungawhau-Mt Eden. However, views of the maunga are only available from the second-floor verandah, and it has been closed to public access for more than a decade due to health and safety considerations. No other parts of the house or surrounding property have any connection with Maungawhau-Mt Eden, as views from lower down are obscured by buildings within the adjoining Crown Research facility and a thick band of vegetation next to that property.

Concerns about the publicly accessible nature of this viewshaft were raised in 2015 as part of the Unitary Plan process, and it is considered that they remain valid. Even though it captures a view of Maungawhau-Mt Eden that is unusual in terms of its viewing angle and location (relative to most other viewshafts to the maunga), this viewshaft has limited value in terms of the regional community and its appreciation of the maunga. For this reason, it is recommended that this MV is deleted.

E18 Maungawhau – Mt Eden (Figure 14)**:**

MV E18 is located south of the important intersection between Mt Eden Road, New North Road and Symonds Street. It captures an important close-up view of Maungawahu-Mt Eden from its namesake Road, and is the only MV viewpoint down that road corridor, north of the maunga, which does so. It captures the skyline and slopes spread across the northern to north-western side of the volcanic maunga, which are strongly articulated by its mixture of mostly native vegetation and open spaces. These culminate in Maungawhau's flat-topped tihi, which slopes gradually north to the north, framing its main crater. A recently constructed lookout on the northern side of the tuff ring, together with the trig point on the maunga's highest point and another lookout – of importance to visitors and locals alike – are also visible.

This view to Maungawahu-Mt Eden emerges as Mt Eden Road curves towards the maunga, directly south of the Power Station and Galbraith's Alehouse, offering a powerful introduction to the maunga and a marked change from the built forms that otherwise hem in its channel both sides of E18's origin point. It is unusual in offering both an expansive and detailed view of the maunga's north-western slopes and form, creating a powerful sense of connection between the volcanic maunga and the road that it is named after.

Consequently, MV E18 offers an important perspective of Maungawhau-Mt Eden, and it should be retained as identified in the AUP.

K01 & K02 Tātua a Riukiuta-Big King (Figures 15 & 16)**:**

MVs K01 and K02 were recommended for deletion in 2015/16 as part of the Unitary Plan process; however, the IHP Panel did not support that recommendation. Both MVs capture views down Mt Eden Road to the crest of a now, much diminished, Tātua a Riukiuta-Big King. Even so, they continue to highlight the significant connection between the residual maunga and a key arterial road – especially so near the heavily used intersection of Mt Eden Road with Balmoral Road (K01). The view from MV K02, from Mt Eden Road further south, K02 supports that introductory contact with the maunga and shows it becoming more prominent on the immediate skyline.

On the basis of the IHP's findings and this review, which together affirm K01 and K02's contribution to the wider community's appreciation of the maunga, it is considered that both MVs should be retained, as presently defined in the AUP.

O10 Maungakiekie – One Tree Hill (Figures 17 & 18)**:**

MV O10 was originally located so as to capture the view to Maungakiekie-One Tree Hill as motorists drive up Merton Road and traverse the College Road roundabout, heading towards St Johns and Kohimarama. As shown in Figure 17, the viewshaft should capture the distinctive form of the maunga and the Logan Campbell Memorial obelisk atop it. However, the actual view from the left-hand side of the roundabout is completely blocked off by recently planted pohutukawas, as is depicted in Figure 16. This planting nullifies the MV. Unfortunately, this is not an uncommon situation, as street tree planting appears to be frequently undertaken without regard to the MVs. Consequently, the situation on College Road is far from exceptional.

Overall, it is considered that Maungakiekie has sufficient visual presence and is sufficiently meaningful to be retained as a Locally Significant Viewshaft, and the street trees should accordingly be relocated to accommodate it.

T08 Rangitoto (Figures 19 & 20)**:**

As motorists drive down St Heliers Bay Road towards the St Heliers Bay shopping centre, the highly distinctive profile of Rangitoto emerges near the St Heliers School sports fields (Figure 18), becoming even more prominent further down the road corridor, a bit closer to the local shopping centre (Figure 19). Both views are strongly emblematic of the close relationship between the Eastern Bays and Rangitoto, with the road's axial focus on the maunga and island enhancing this connection.

Of these views, that shown in Figure 19 offers better appreciation of Rangitoto's expansive form, albeit partly behind palm trees and other vegetation. Adoption of this MV starting point would keep a revised T08 viewshaft within the physical 'cone' of the existing viewshaft, but it would be slightly less restrictive in relation to future development near the top half of St Heliers Bay Road. Both options would have a similar 'base plate' and associated height limit.

Regardless, it is considered that the Locally Significant Viewshaft – or a variation to it, as described above – should be retained.

W06 Maungarei – Mt Wellington (Figures 21 & 22)**:**

MV W06 was originally delineated when Waipuna Road was a key route to Panmure, Pakuranga and Howick – before the arrival of the south-eastern arterial. It also predated redevelopment of the Waipuna Hotel and Conference Centre, which raised its physical profile to the then maximum height limit applicable to the hotel site. Now, the view is largely compromised by the enlarged hotel and conference centre, the offset nature of the viewshaft – at right angles to Waipuna Road, and the reality that the road itself has lost much of its significance as a regionally important corridor (Figure 20).

On the other hand, the recreation reserve around the Panmure Lagoon has been greatly expanded over recent years, with a large parking area and walkway/cycleway both found at the end of Peterson Road off Waipuna Road. Figure 21 captures the view from the end of that road to Maungarei-Mt Wellington over the Panmure Lagoon, offering a much clearer view of its volcanic profile and even the terracing either side of the old quarry and pine block that still scar the maunga's southern slopes. Reflecting this current situation, it is considered that W06 would benefit greatly from relocation to the end of Peterson Road – as a Locally Significant Viewshaft.

However, it is also recognised that such a shift would impose a realigned viewshaft overlay on the area south of Maungarei-Mt Wellington, and this is not within the remit of the current assessment. It is, though, a matter that should be considered in the future. As matters currently stand, the W06 viewshaft does not appear to have sufficient value and significance to retain its status as a MV.

W13 Maungarei – Mt Wellington (Figure 23)**:**

Opposite Sacred Heart College, a narrow reserve connects West Tamaki Road with Leybourne Circle. Descending quite rapidly from West Tamaki Road, the upper margins of the reserve and adjoining roadside offer a reasonably clear view to Maungarei-Mt Wellington. Unfortunately, though, the outline of the maunga is soon lost behind single-storey state housing next to, and below, the reserve, and as Figure 22 demonstrates:

- Any development taller than the current single-storey dwellings would compromise it;
- The view of Maungarei-Mt Wellington is already soon lost in the course of walking through the reserve;
- The reserve itself has limited value in terms of views from West Tamaki Road – which are fleeting at best; and
- Although sitting directly opposite Sacred Heart College, the viewshaft is not associated with activity areas inside the college or views from within it.

Consequently, much as the profile of Maungarei-Mt Wellington remains clearly etched on the south-western skyline when standing at the very top of the reserve, it is nevertheless considered that this MV

lacks the public significance and 'robustness' to withstand even modest development near the reserve. As a result, it is considered that it should be deleted.

A13 Ōwairaka – Mt Albert (Figure 24)**:**

At the point where the North-western Motorway (SH16) passes under Te Atatu Road, it starts to descend towards the Whau River and, at the same time, merge with the on-ramp for city-bound traffic from Te Atatu. MV A13 captures the point of merger between the motorway and the slip lanes onto it, which coincide with the first point at which both the volcanic profile of the Auckland Isthmus first comes into view on SH16 and the main body of the inner Waitemata Harbour does the same. At least three tupuna maunga are visible at this point, of which **Ō**wairaka-Mt Albert is the most prominent, while Maungakiekie-One Tree Hill and the Tātua a Riukiuta-Big King are visible beyond it, then Maungawhau-Mt Eden and Rangitoto, emerge past the cut that the highway passes through.

Ōwairaka is not, in its own right, the most expressive or clearly articulated of Auckland's volcanic landforms, with many of its lower and middle slopes partly covered in housing. Like many of the City's other volcanic features, it also has a rather hummocky profile, not assisted by the historic lowering of its profile to provide railway ballast for a growing city. Even so, its profile is unmistakably that of one of Auckland's volcanoes and, together with its strategic location, this means that it is both an important feature in its own right and a representative of Auckland's wider volcanic field and landscape at this key gateway to central Auckland. Together with the other maunga just described and the Waitemata Harbour, it conveys an important sense of Auckland's natural heritage. Notably, in the Environment Court's *Tram Lease & Ors v Auckland Council (NZEnvC 133)* decision of June 2015, it describes the MV and views its captures as follows (para.s 89 and 90):

> *We are unanimous that the view to Mt Albert was striking from this position, and represented a clear threshold or entry view across the harbour towards Auckland, with the volcanic field clearly in view. This included Mt Albert as the dominant initial element, but with partial views of Big King, One Tree Hill and Mt Eden. That view persisted for some time driving on the motorway, and although it was interrupted at various points, continued to be visible for several minutes. The drive is for a significant part towards the view, i.e. it gets larger as one approaches the city.*
>
> *We are not convinced by any arguments that the vegetation or the existing buildings on the natural feature, or the view shaft itself, have no value. We conclude that it is the tension between the built environment on the lower shoulders of Mt Albert and the dominant (perhaps tonsured) features of the cone with the patches of colour through it which make the view so striking. We also recognise that, in the context of travelling along the motorways, the view of the volcanic view field changes, with several of the cones becoming more dominant as one moves from north to south, or south to north, west to east or east to west. It is that interchange of the volcanoes and their landmark quality that marks out these view shafts as significant.*

It is considered that MV A13 offers an important sequence of views to **Ō**wairaka-Mt Albert (albeit with just the one origin point) and should be retained as identified in the AUP.

3. Summary of Findings

Table 1, following, summarises the findings and recommendations of this review:

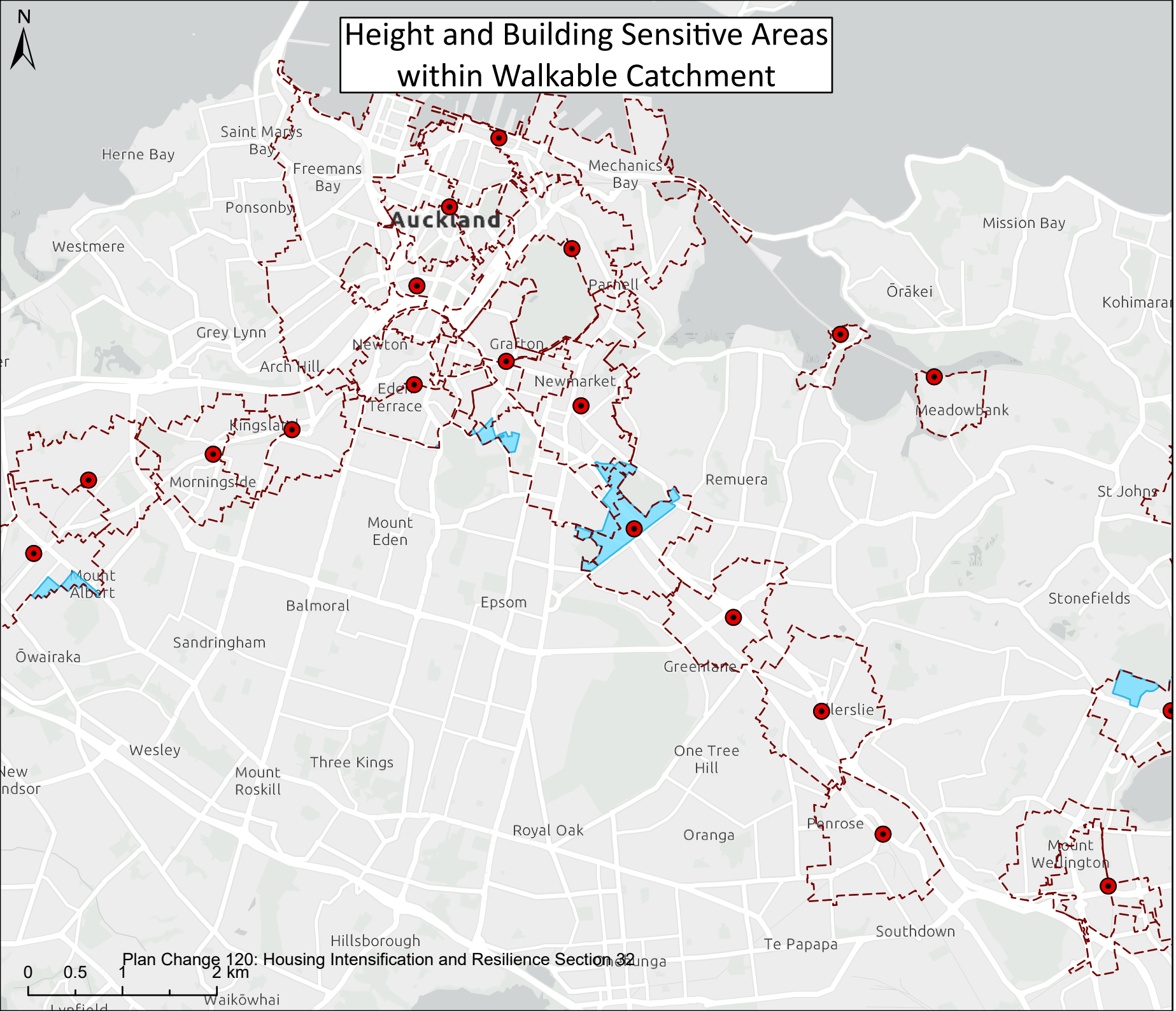
Table 1.

Maunga Viewshaft:	Maunga Addressed:	Value From a Regional or Local Perspective:	Recommendations:
E10	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E16	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E19	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E20	**Mt Eden / Maungawhau**	Regionally Significant	No Change to the MV
E06	**Mt Eden / Maungawhau**	Not Regionally or Locally Significant	Deletion of the MV
E18	**Mt Eden / Maungawhau**	Regionally Significant	Retention of the MV
K01	**Tātua a Riukiuta-Big King**	Regionally Significant	No Change to the MV
K02	**Tātua a Riukiuta-Big King**	Regionally Significant	No Change to the MV
O10	**Maungakiekie-One Tree Hill**	Locally Significant	No Change to the MV Relocation of the street trees in the MV
T08	**Rangitoto**	Locally Significant	No Change to the MV; Possible relocation of its origin point in the future
W06	**Maungarei-Mt Wellington**	Not Regionally or Locally Significant	Deletion of the MV; Possible replacement & relocation of the MV in the future
W13	**Maungarei-Mt Wellington**	Not Regionally or Locally Significant	Deletion of the MV
A13	**Ōwairaka-Mt Albert**	Regionally Significant	Retention of the MV

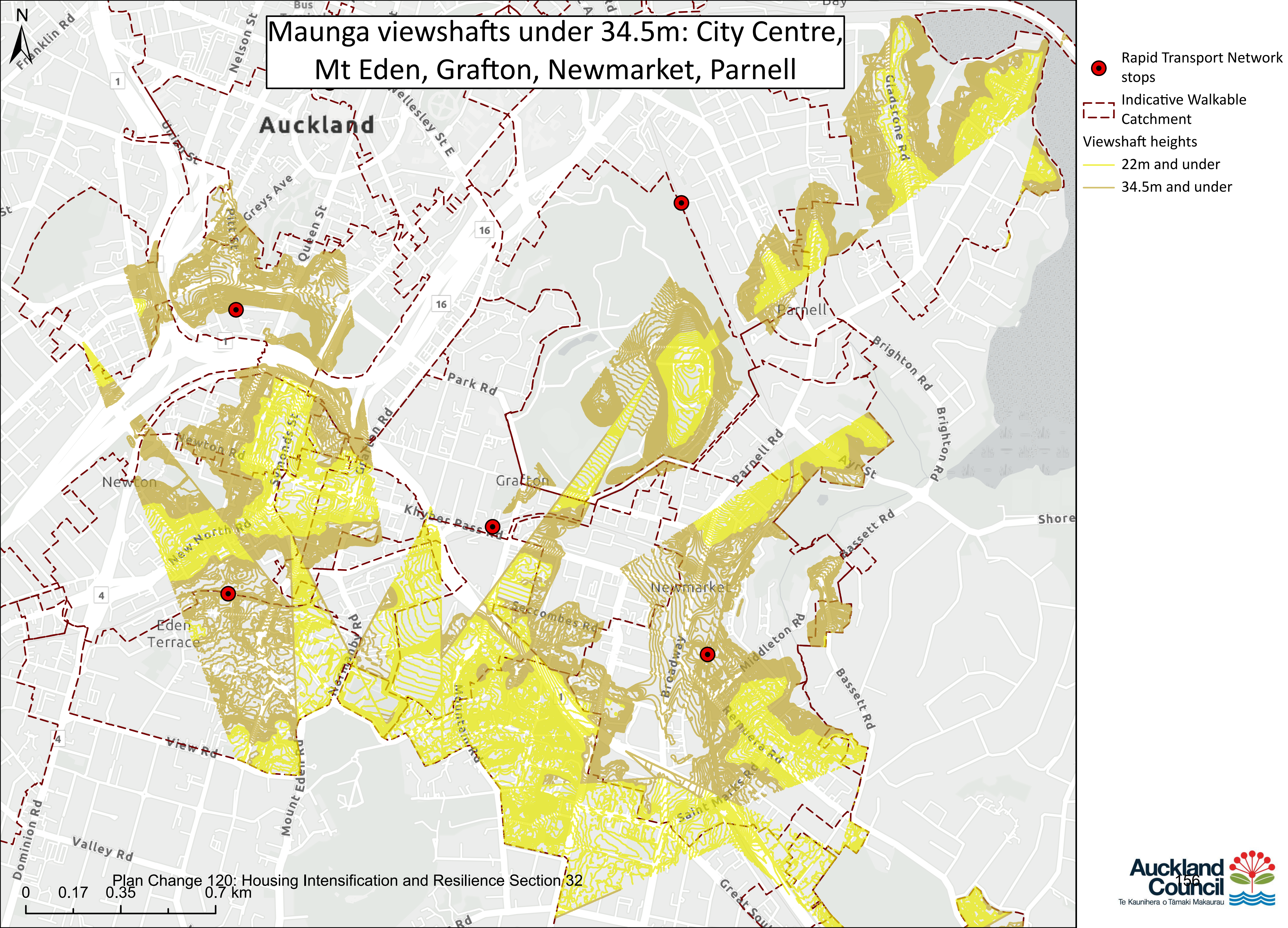
Stephen Brown

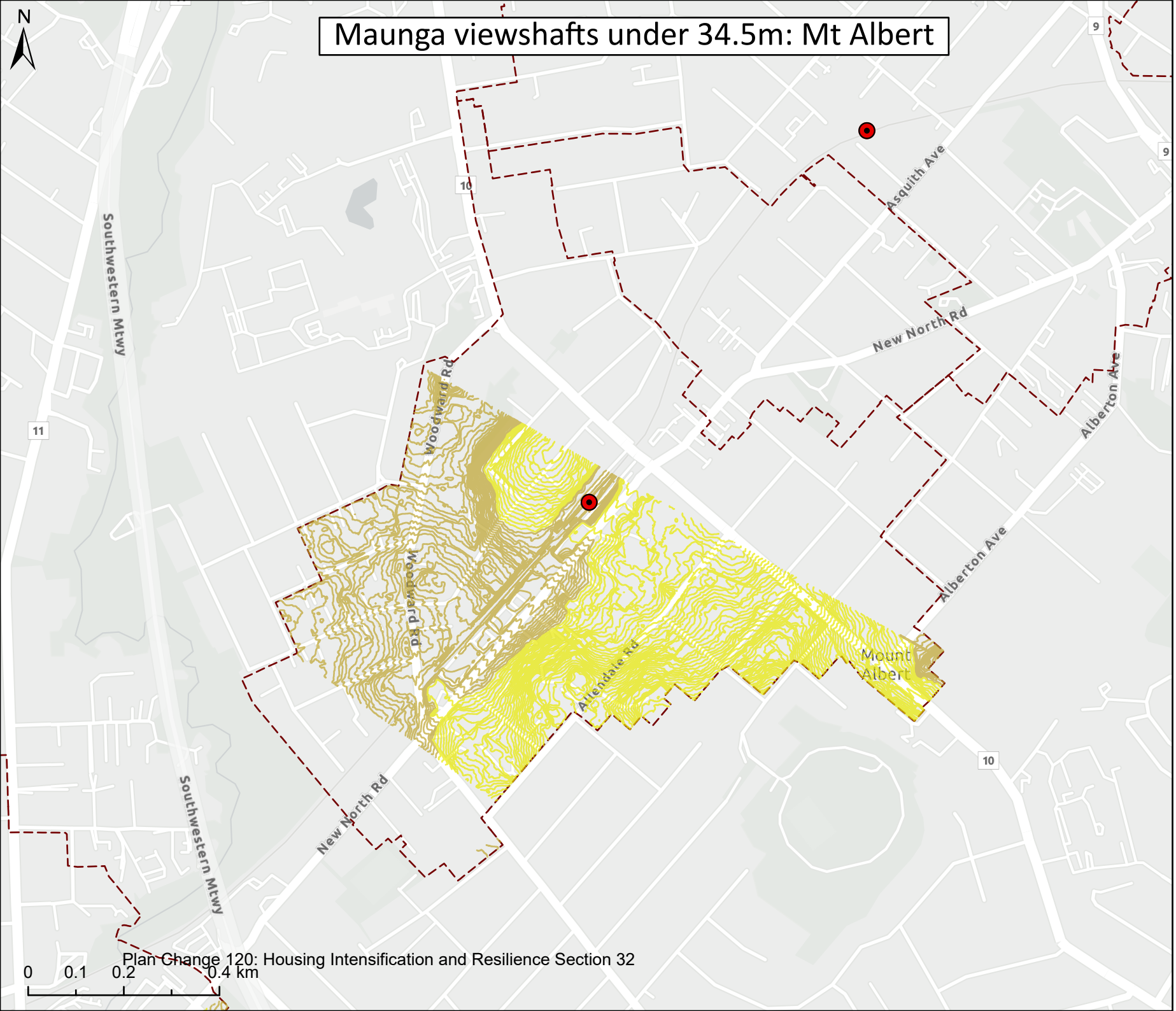
BTP, Dip LA, FNZILA

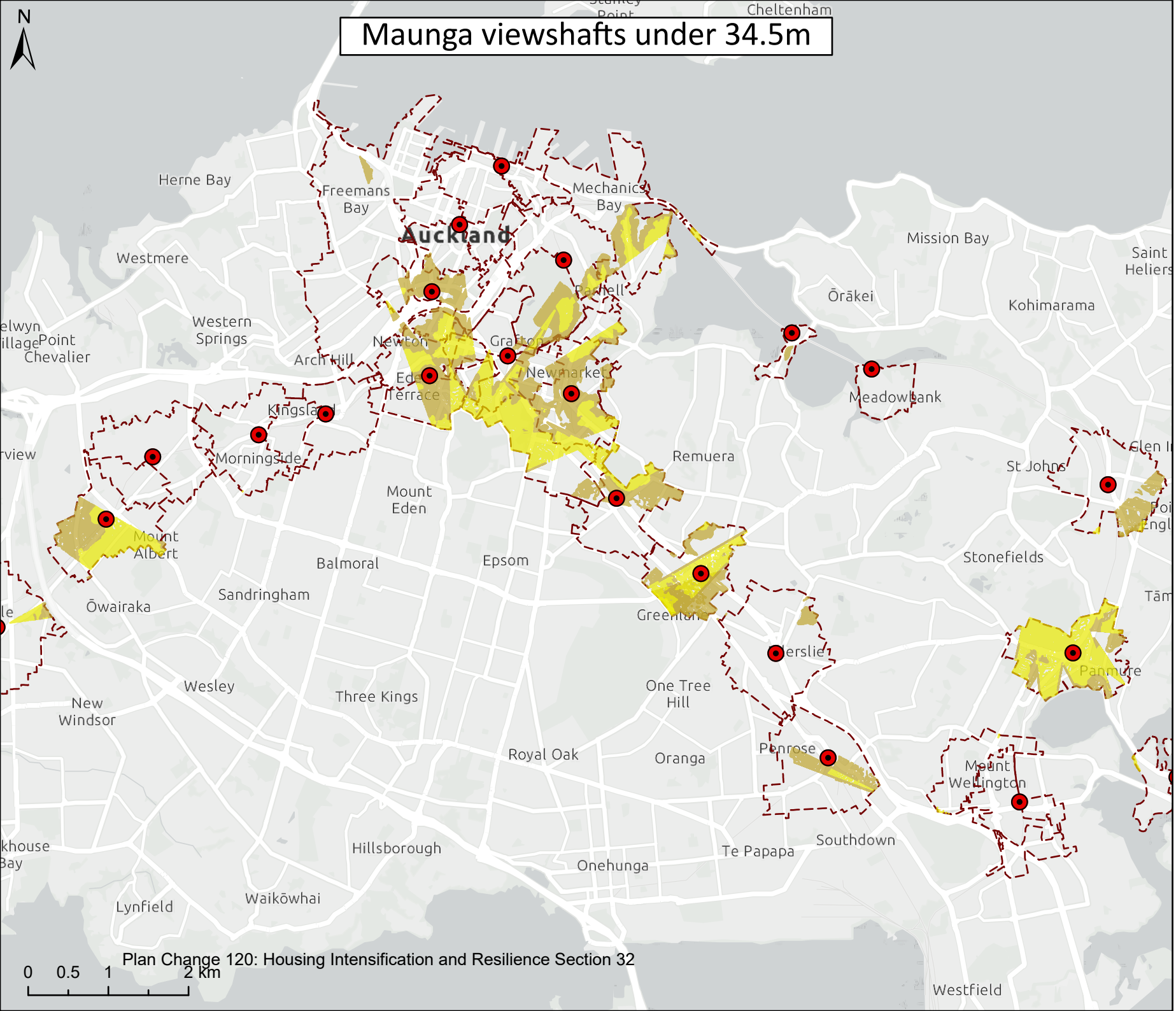
Appendix F - Large Scaled Maps (A3)


Height and Building Sensitive Areas within Walkable Catchment
N
Rapid Transport Network stops
Indicative Walkable Catchment
Height and Building Sensitive Areas within Walkable Catchments
Auckland
Herne Bay
Saint Marys Bay
Freemans Bay
Ponsonby
Westmere
Mechanics Bay
Parnell
Mission Bay
Ōrākei
Kohimarama
Grey Lynn
Arch Hill
Newton
Grafton
Eden Terrace
Newmarket
Meadowbank
Kingsland
Morningside
Remuera
St Johns
Mount Eden
Mount Albert
Balmoral
Epsom
Stonefields
Sandringham
Ōwairaka
Greenlane
Glerslie
Wesley
Three Kings
Mount Roskill
One Tree Hill
Royal Oak
Oranga
Panrose
Mount Wellington
Hillsborough
Te Papapa
Southdown
Waikōwhai
0 0.5 1 2 km
Plan Change 120: Housing Intensification and Resilience Section 32
Auckland Council
Te Kaunihera o Tāmaki Makaurau
155

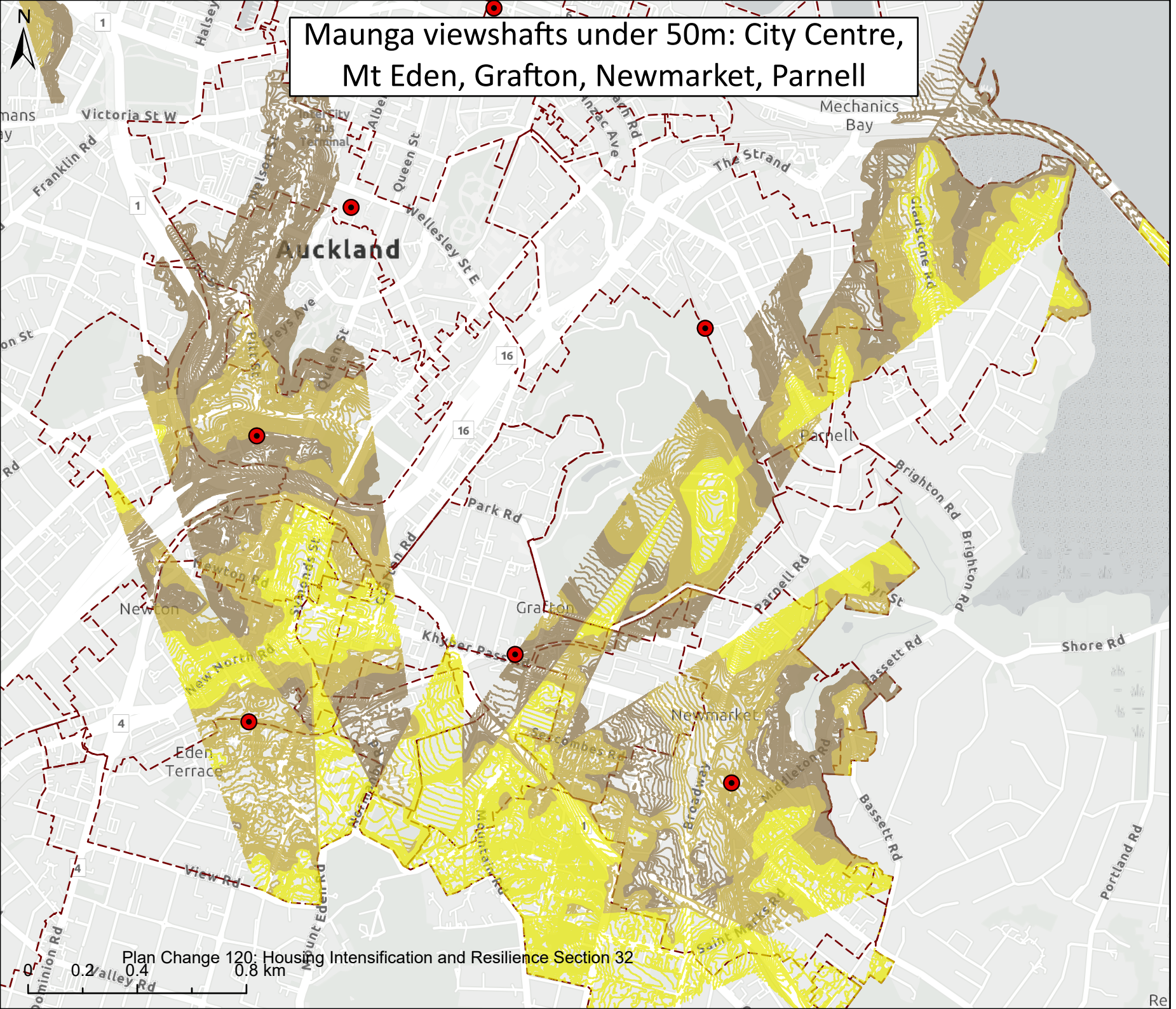
Maunga viewshafts under 34.5m: City Centre, Mt Eden, Grafton, Newmarket, Parnell



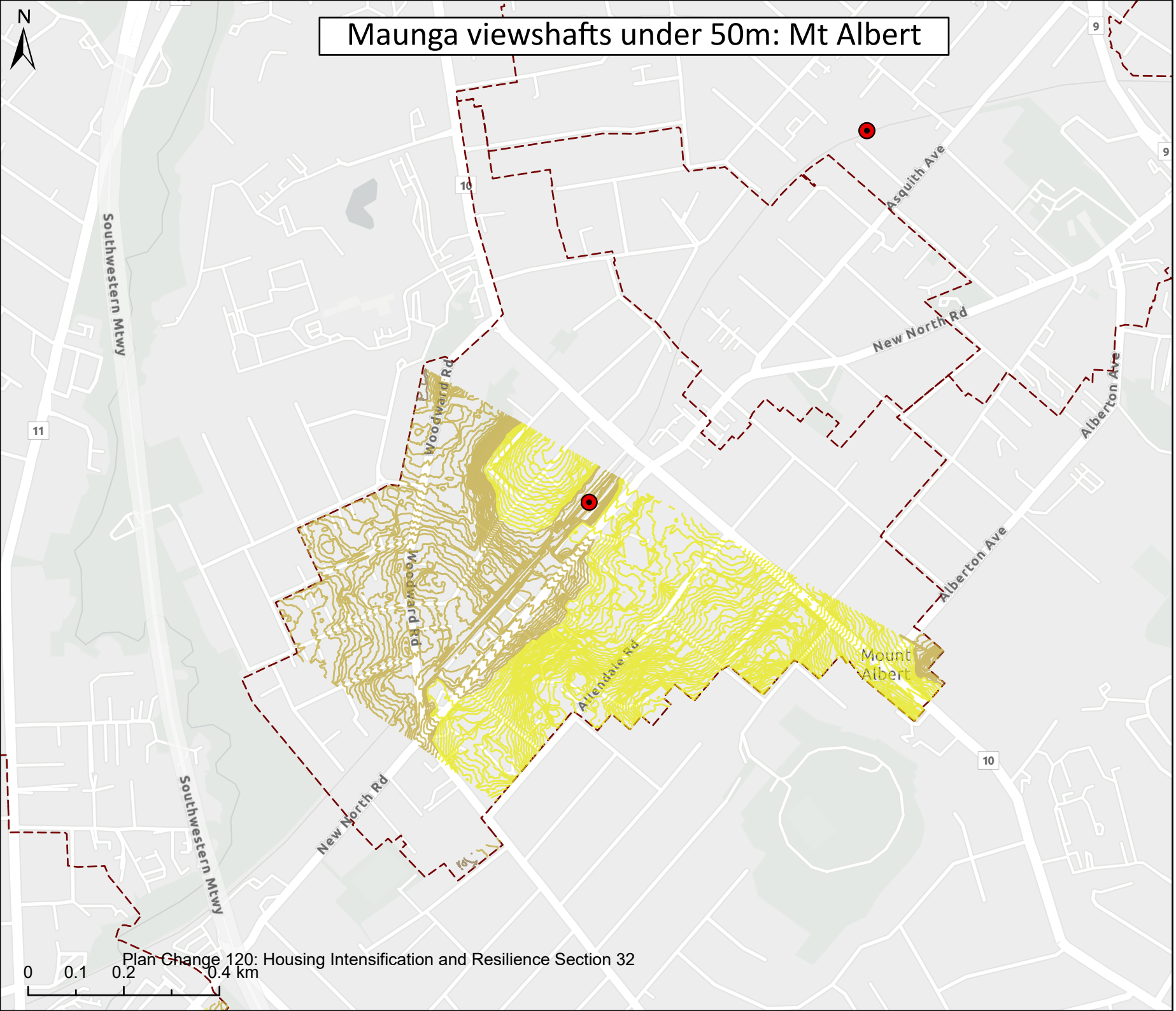

Maunga viewshafts under 34.5m: Mt Albert
N
Rapid Transport Network stops
Indicative Walkable Catchment
Viewshaft heights
22m and under
34.5m and under
Southwestern Mtwy
Woodward Rd
New North Rd
Asquith Ave
Alberton Ave
Arlington Rd
Mount Albert
9
10
11
0 0.1 0.2 0.4 km


Maunga viewshafts under 34.5m
N
Rapid Transport Network stops
Indicative Walkable Catchment
Viewshaft heights
22m and under
34.5m and under
Herne Bay
Freemans Bay
Mechanics Bay
Auckland
Westmere
Western Springs
Point Chevalier
Arch Hill
Newton
Grafton
Parnell
Newmarket
Mission Bay
Ōrākei
Kohimarama
Meadowbank
Remuera
St Johns
Stonefields
Kingsland
Morningside
Mount Eden
Mount Albert
Balmoral
Epsom
Sandringham
Ōwairaka
Greenlane
Panmure
Wesley
New Windsor
Three Kings
One Tree Hill
Royal Oak
Oranga
Penrose
Mount Wellington
Hillsborough
Onehunga
Te Papapa
Southdown
Lynfield
Waikōwhai
Westfield
0 0.5 1 2 km

Maunga viewshafts under 50m: City Centre, Mt Eden, Grafton, Newmarket, Parnell



Maunga viewshafts under 50m: Mt Albert



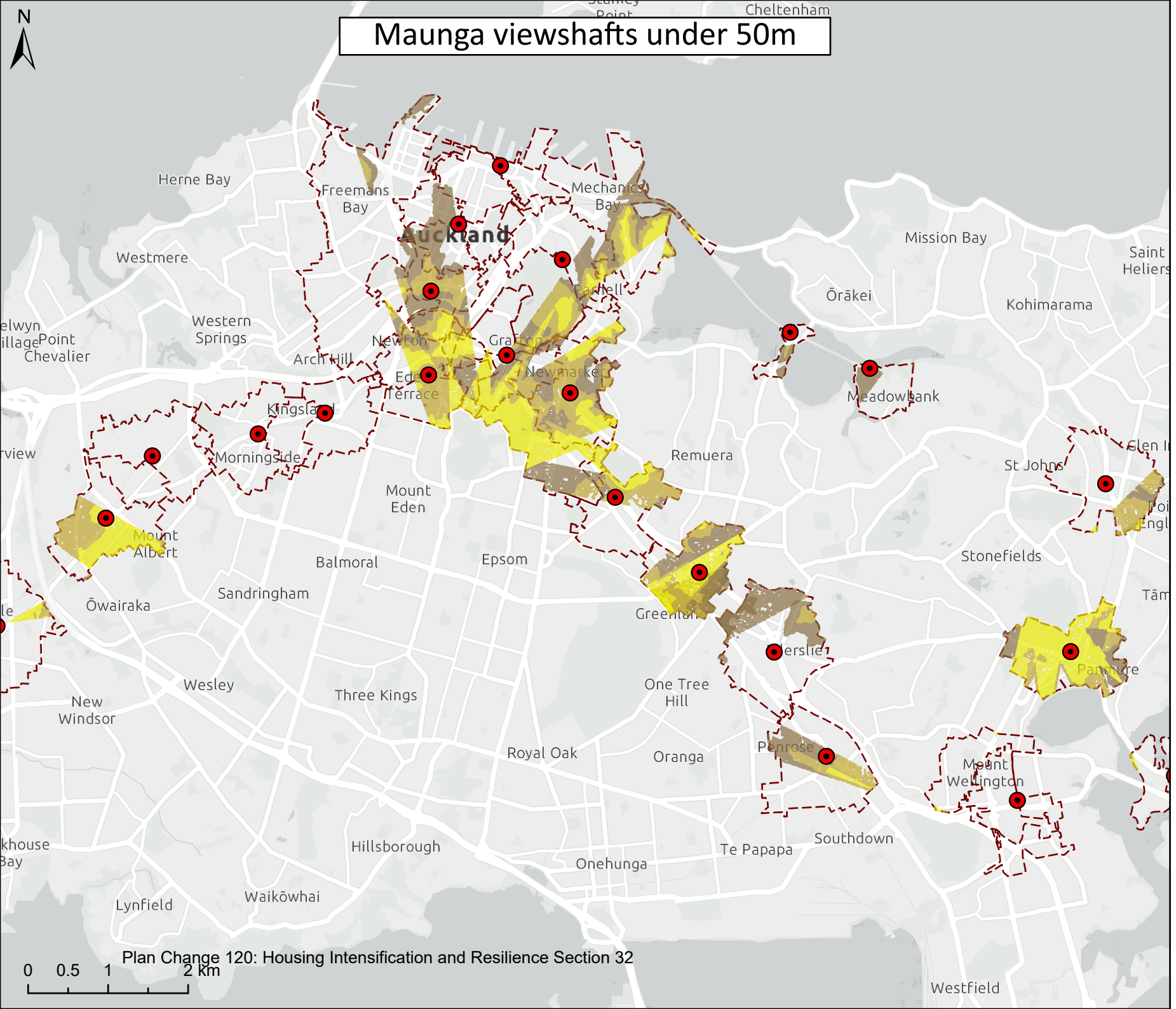
Rapid Transport Network stops

Indicative Walkable Catchment

Viewshaft heights

- 22m and under
- 34.5m and under
- 50m and under

Auckland Council
Te Kaunihera o Tāmaki Makaurau


Maunga viewshafts under 50m
N
Rapid Transport Network stops
Indicative Walkable Catchment
Viewshaft heights
22m and under
34.5m and under
50m and under
Herne Bay
Freemans Bay
Mechanics Bay
Auckland
Westmere
Western Springs
Point Chevalier
Arch Hill
Newton
Grafton
Parnell
Mission Bay
Ōrākei
Kohimarama
Meadowbank
Kingsland
Morningside
Mount Eden
Remuera
St Johns
Mount Albert
Balmoral
Epsom
Stonefields
Ōwairaka
Sandringham
Greenlane
Wesley
New Windsor
Three Kings
One Tree Hill
Royal Oak
Oranga
Penrose
Mount Wellington
Hillsborough
Onehunga
Te Papapa
Southdown
Lynfield
Waikōwhai
Westfield
0 0.5 1 2 km