



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

to the Auckland Unitary Plan (Operative in part)

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

Stockade Hill Viewshaft Overlay

EVALUATION REPORT

Table of Contents

Executive Summary.....	3
1. Introduction	4
2. Integrated evaluation for qualifying matters.....	5
3. Issues.....	7
4. Objectives and Policies (existing).....	9
Rules and methods (existing).....	11
5. Development of Options.....	12
Consequences for development capacity.....	14
Evaluation of options	17
Analysis	19
Risks of acting or not acting	19
Effectiveness and efficiency.....	19
Description of how the qualifying matter is to be implemented	20
Overall conclusion.....	20
Appendices.....	21
Information Used	21
Consultation summary.....	21

Executive Summary

1. The following report addresses the evaluation required by Section 32 and Schedule 3C of the Resource Management Act 1991 (**RMA**), as it pertains to the application of the Stockade Hill Viewshaft Overlay (**SHVO**) as a qualifying matter incompatible with the level of development required by Policy 3 of the National Policy Statement on Urban Development (**NPS-UD**). The scale and significance of the issues are assessed as being minor.
2. The SHVO is used to restrict building heights to ensure that new development is of a height that does not intrude into or obstruct views to the coastal environment.
3. The following evaluation and findings have been informed by a site-specific assessment as required by the Resource Management Act 1991 (RMA), comprised of geospatial analysis and expert landscape assessment. It is concluded that the additional development enabled by Policy 3 would adversely impact the values managed by the SHVO, which therefore requires identification as 'any other matter which makes higher density' specified by Policy 3 of the NPS-UD inappropriate.
4. It is proposed to retain the existing provisions in Chapter D20A and to expand the 8m height overlay where the height of the viewshaft plane above ground is less than or equal 12m, being the enabled building height within the Mixed Housing Urban (**MHU**) Zone. It is also proposed that certain sites within the Policy 3(d) area are zoned MHU rather than THAB, where the heights and densities provided by the proposed THAB zone would be inconsistent with the values of the SHVO qualifying matter.
5. The above recommendation would restrict building heights on specified land adjacent to the Howick Town Centre (Policy 3(d) of the NPS-UD), which is otherwise identified through PC120 for application of 6-storey THAB zone.
6. The proposed spatial application of the qualifying matter is of relatively limited extent, generally being restricted to those areas near the ridge below Stockade Hill (generally coinciding with the location of Melons Bay Road) where the zoning results in potential risk of intrusions. A restricted discretionary resource consenting pathway remains available to applicants where buildings would exceed the 8m specified in the 8m height area, and this will enable appropriate assessment as to the effects on the viewshaft.
7. The reduction in development capacity and potential on the above number of sites is considered to be appropriate, and is the most effective and efficient means of ensuring the values of the SHVO are managed.

1. Introduction

1. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the Resource Management Act 1991 (**RMA**) for proposed Plan Change 120 [Auckland Housing Planning Instrument] (**PC120**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. The background to and objectives of PC120 are discussed in the overview report, as is the purpose and required content of section 32 and Schedule 3C evaluations.
3. This report discusses the implications of applying the SHVO as a qualifying matter to the requirements of clause 4(1)(b) of Schedule 3C of the RMA and the implementation of policy 3 of the NPS-UD. This report also evaluates the provisions which have been included in PC120 relating to the SHVO.
4. The Council may make the relevant building height or density requirements of clause 4(1)(b) and (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD less enabling of development in relation to an area within any zone in an urban environment only to the extent necessary to accommodate 1 or more of the following qualifying matters that are present:
 - (a) a matter listed in section 771(a) to (i) of the RMA;
 - (b) any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the National Policy Statement on Urban Development 2020 (**NPS-UD**), inappropriate in an area but only if subclause (4) of clause 8 of Schedule 3C is satisfied.
5. Under clause 8(2) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(a) or (1)(b) of clause 8:
 - (a) demonstrate why the Council considers:
 - (ii) that the area is subject to a qualifying matter; and
 - (iii) that the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) or policy 3 for that area; and
 - (b) assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
 - (c) assess the costs and broader impacts of imposing those limits.
6. Under clause 8(4) of Schedule 3C of the RMA, the evaluation report required under section 32 of the RMA must, in relation to a proposed amendment to accommodate a qualifying matter under subclause (1)(b) (an "other" qualifying matter), also:
 - (a) identify the specific characteristic that makes the level of development specified by clause 4(1)(b) or (c) or policy 3 inappropriate in the area; and

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

2. Integrated evaluation for qualifying matters

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

- review of prior evidence and recommendations prepared for Plan Change 3 (Protection of Views from Stockade Hill) to the Auckland Unitary Plan
- site visits, geospatial analysis, and expert landscape assessment.

10. The scale and significance of the issues is assessed to be minor.

11. This section 32/Schedule 3C evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

Table 1 Integrated approach for any matter specified in section 771(a) to (i) that is not currently operative in the AUP and any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD, inappropriate in an area

Standard sec 32 steps	Plus clause 8Schedule 3C steps
<p>Issue</p> <p>Define the problem-provide overview/summary providing an analysis of the qualifying matter</p>	<p>Identify whether an area is subject to a qualifying matter and describe the qualifying matter.</p> <p>[refer to Section 3 of this report]</p>
<p>Identify and discuss objectives / outcomes</p>	<p>Identify relevant RPS / district level objectives and policies. Describe why the Council considers that 1 or more qualifying matters apply to the identified areas, and whether the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD for that area.</p> <p>Justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.</p> <p>[refer to Section 4 of this report]</p>
<p>Identify and screen response options</p>	<p>Consider a range of reasonably practicable options for achieving the objectives including alternative standards or methods for these areas having considered the particular requirements in clause 4(1)(b) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD and assess the efficiency and effectiveness of the provisions.</p> <p>Site-specific analysis that evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter.</p> <p>[refer to Section 5 of this report]</p>

<p>Collect information on the selected option(s)</p>	<p>Assess the impact that limiting development capacity, building heights or density (as relevant) will have on the provision of development capacity.</p> <p>Site-specific analysis that evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD while managing the specific characteristics.</p> <p>[refer to Section 5 of this report]</p>
<p>Evaluate options – costs for housing capacity</p>	<p>Assess the costs and broader impacts of imposing those limits on development capacity.</p> <p>[refer to Section 5 of this report]</p>
<p>Evaluate option(s) - environmental, social, economic, cultural benefits and costs</p>	<p>Provide an assessment of the benefits and costs of the options in the light of the new objectives introduced by the NPS-UD relating to well-functioning urban environments.</p> <p>[refer to Section 5 of this report]</p>
<p>Selected method / approach</p>	<p>Describe how the preferred approach to implementing the qualifying manner is limited to only those modifications to the extent necessary to accommodate the qualifying matter; and how the qualifying matter is applied.</p> <p>[refer to Section 5 of this report]</p>
<p>Overall judgement as to the better option (taking into account risks of acting or not acting)</p>	<p>Conclusion as to the implications of the qualifying matter for development capacity to be enabled by NPS-UD in the areas where the qualifying matter applies.</p> <p>[refer to Section 5 of this report]</p>

3. Issues

12. The qualifying matter being evaluated is the SHVO qualifying matter, the purpose of which is described in the overlay description as:

“This overlay is used to restrict building heights to ensure that new development is of a height that does not intrude into or obstruct views to the coastal environment.”

13. As set out in the Landscape Assessment prepared by Melean Absolum and included as **Attachment 1**, the views are identified as being locally significant in accordance with the criteria contained within Chapter D16 Local Public Views of the AUP. It is understood that the values of the SHVO are associated with the views from Stockade Hill to the surrounding landscape and the Hauraki Gulf.

14. Earlier iterations of viewshafts from Stockade Hill were introduced through the legacy Manukau City Council District Plan. However, the SHVO in its current form was introduced and confirmed through Plan Change 3 – Protection of Views from Stockade Hill, Howick (PC3) to the AUP.
15. The SHVO imposes a building height restriction where zone heights would otherwise enable intrusions to occur based on ground contours. The SHVO generally does not seek to manage other development standards that may otherwise impact densities of development such as building coverage or yard setbacks; however, if resource consent is triggered due to non-compliance with the building height restriction, the bulk, location, and form of the building will be considered insofar as the views are affected.
16. Within the operative AUP, an 8m building height area has been applied exclusively to land zoned MHU in locations where the viewshaft plane is less than 12m (being the MHU maximum building height) above ground level.
17. Through PC120, the SHVO qualifying matter predominantly impacts residentially zoned land adjacent to (and to the northwest of) the Howick Town Centre, which has been identified through analysis as otherwise appropriate for application of 6-storey THAB zoning commensurate with the level of commercial activity and community services, as directed by Policy 3(d) of the NPS-UD.
18. The maximum building height of 22m generally enabled within the proposed PC120 THAB Zone is incompatible with the values of the SHVO where the recession plane is located 22m or less above existing ground level, as this would enable intrusions into and/or obstruction of the views to the coastal environment from Stockade Hill.
19. Given the above, specific management through identification of the SHVO as a qualifying matter is required with respect to application of the THAB zone in accordance with Policy 3(d) of the NPS-UD. Whilst not a qualifying matter specified in section 771(a) to (i) of the RMA, the SHVO is considered to be ‘any other matter that makes higher density, as specified by clause 4(1)(b) of Schedule 3C of the RMA or policy 3 of the NPS-UD inappropriate in an area.’
20. In addition, accessibility analysis carried out to inform the plan change has also resulted in an increased spatial application of MHU zoning proposed along Mellons Bay Road. It is noted that this rezoning is not specifically directed by Policy 3 of the NPS-UD, and therefore application of the SHVO to this area does not need to be assessed as a qualifying matter however this similarly requires assessment to determine if the building heights within the zone would enable intrusions into the viewshaft.
21. Both in the case of the proposed THAB and the proposed extension of MHU, the viewshaft plane is lowest relative to ground level along Mellons Bay Road, where there is a high point in the form of a natural ridgeline. Beyond this, to the east and west of this ridgeline, the topography falls away relatively quickly.

4. Objectives and Policies (existing)

22. The decisions on Proposed Plan Change 3 to the AUP and the associated consent order resolving the appeals establish the operative framework within which views from Stockade Hill are managed. Notably, Chapter D20A does not contain its own set of objectives and policies but refers to objectives and policies within Chapter D16 Local Public Views, discussed in greater detail below.
23. In summary, the management approach in the AUP to the SHVO qualifying matter includes:
- Chapter B4 Natural Heritage Objectives and Policies (Regional Policy Statement)
 - Chapter D16 Local Public Views and Chapter D20A Objectives and Policies
 - Chapter D20A Rules and Standards, in association with the mapped overlay
 - Chapter D20A Matters of Discretion and Assessment Criteria
24. The relevant AUP objectives and policies, that support the SHVO qualifying matter are as shown below in the table:

Table 2 Relevant Objectives and Policies

AUP Chapter	Objective / Policy	Summary of matter addressed
<p>RPS Chapter B4 Natural Heritage</p>	<p>Objective B4.3.1.(2) <i>Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use, and development.</i></p> <p>Policy B4.3.2.(5) <i>Identify and evaluate a view from a public place to the coastal environment, ridgelines and other landscapes for its regional or local significance considering the following factors:</i></p> <ul style="list-style-type: none"> (a) <i>The viewpoint conveys the view to an audience from a public viewpoint that is regionally or locally significant;</i> (b) <i>The view conveys an intact view within a wider context which is of high or good quality;</i> (c) <i>The view will contribute to or reinforce an overall appreciation of the region’s natural landscape;</i> (d) <i>The view recognises the importance of the landscape to Mana Whenua;</i> (e) <i>The extent to which there are other similar public views; and</i> (f) <i>Taking into account the extent to which the viewshaft will affect future development otherwise enabled by this Plan.</i> 	<p>Objectives and policies within Chapter B4 Natural Heritage provide overarching direction enabling the identification, evaluation, and management of significant views to the local environment, ridgelines, and landscapes.</p> <p>Policy B4.3.2.(5) outlines specific considerations to have regard to in identifying and evaluating views to the coastal environment, ridgelines, and landscapes, including their local or regional significance.</p> <p>Policy B4.3.2.(6) provides for the scheduling of local public views where they meet relevant criteria.</p>

AUP Chapter	Objective / Policy	Summary of matter addressed
	Policy B4.3.2.(6) <i>Include a view in Schedule 11 Local Public View Schedule if it is locally significant.</i>	
Chapter D16 Local Public Views	<p>Objective D16.2.(1) <i>Locally significant public views are managed to maintain and enhance the visual integrity of the views.</i></p> <p>Policy D16.3.(1) <i>Identify and evaluate significant local public viewshafts using the following criteria:</i></p> <ul style="list-style-type: none"> <i>(a) The extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape.</i> <i>(b) The community association with, or public appreciation of, the values of the viewshaft.</i> <i>(c) The visual coherence, unity or integrity of the viewshaft and its view; and</i> <i>(d) The potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates.</i> <p>Policy D16.3.(2) <i>Manage development on sites within the viewshafts to avoid adverse physical and visual effects on the viewshaft including adverse cumulative effects on the viewshaft.</i></p> <p>Policy D16.3.(3) <i>Require public access to be maintained to the viewing point where the viewshaft originates.</i></p>	<p>Objectives and policies within Chapter 16 collectively seek to provide for the evaluation, identification, and management of locally significant public views.</p> <p>Provisions seek to maintain and enhance the visual integrity of identified views, and avoid adverse effects of unmanaged development on the viewshafts.</p>
Chapter D20A Stockade Hill Viewshaft Overlay	<p>Objective D20A.2.(1) <i>Objective D16.2.(1) applies to this overlay.</i></p> <p>Policy D20A.3.(1) <i>Policies D16.3.(1), D16.3.(2) and D16.3.(3) apply to this overlay.</i></p>	<p>Objectives and Policies within Chapter D20A refer to and rely on those set out in Chapter D16.</p>

25. The AUP RPS sets out the framework for the management and protection of significant views to the coastal environment, ridgelines, and other landscapes. This outlines specific considerations to have regard to in identifying and evaluating these views, including their local or regional significance.

26. Chapters D16 and D20A seek to manage effects of development being located within locally significant public views and seek to maintain and enhance the visual integrity of the views. The protected views are of Auckland's wider landscape and maritime setting and provide a sense of identity at the local level. Individual viewing points, and their locally significant viewshafts from public places, contribute to the unique character of many of Auckland's neighbourhoods and coastal areas.

27. In addition, it needs to be recognised that Chapter D20A views are of the Hauraki Gulf and its Islands. When considering the range of densities for these areas covered by this viewshaft and associated height limits, the Hauraki Gulf Marine Part Act 2000 (HGMPA) needs to form part of this consideration. Specifically, it is considered these Overlays contribute to Objectives (d) and (e) of Section 8, which are as follows:

8 Management of Hauraki Gulf

To recognise the national significance of the Hauraki Gulf, its islands, and catchments, the objectives of the management of the Hauraki Gulf, its islands, and catchments are—

- (d) the protection of the cultural and historic associations of people and communities in and around the Hauraki Gulf with its natural, historic, and physical resources:*
- (e) the maintenance and, where appropriate, the enhancement of the contribution of the natural, historic, and physical resources of the Hauraki Gulf, its islands, and catchments to the social and economic well-being of the people and communities of the Hauraki Gulf and New Zealand:*

28. The viewshaft originating from Stockade Hill has been evaluated against the criteria in Policy D16.3.(1) and identified as being locally significant. As has been noted above, the level of development required by Policy 3 of the NPS-UD is considered to be incompatible with the maintenance and enhancement of the visual integrity of the views as set out in Objectives D20A.2.(1) and D16.2.(1), as the building heights enabled through the uninhibited application of Policy 3(d) and associated zone provisions would otherwise enable intrusions into the viewshaft in certain locations.

Rules and methods (existing)

29. The primary means of managing the values of the operative SHVO is through the application of an 8m building height area, which has been introduced where the zone building height standards would otherwise enable intrusions into the viewshaft based on ground contours. The extent of this 8m building height area as it exists as an overlay in the AUP-OP is shown in **Figure 1** below.

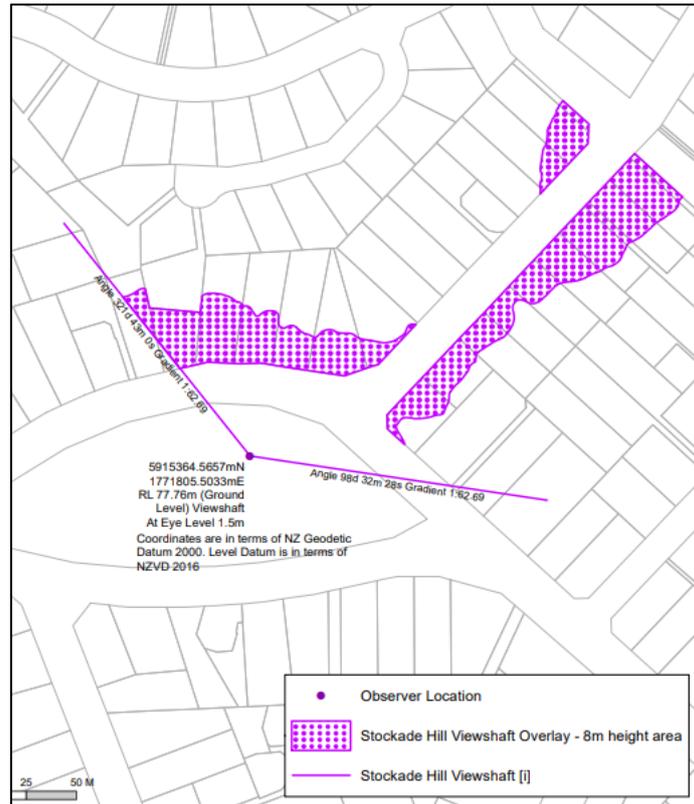


Figure 1. Operative SHVO 8m building height area

30. The SHVO does not manage other development standards that may otherwise impact densities of development, such as building coverage or yard setbacks.
31. Chapter D20A contains two rules managing potential intrusions into the viewshaft. Rule D20A.4.1.(A2) in particular requires resource consent as a restricted discretionary activity where buildings are proposed within the 8m height control which would exceed 8m in height. Associated matters of discretion in D20A.8.1. and assessment criteria in D20A.8.2. enable assessment of (a) the effects of the intrusion on the integrity and values of the SHVO, (b) the functional or operational need for the intrusion, and (c) whether there are practicable alternatives.

5. Development of Options

32. Section 32 of the RMA requires an examination of the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The overall objective (purpose of the proposal) of Plan Change 120 has two key objectives – it proposes:
- measures to better manage significant risks from natural hazards region-wide; and
 - an amended approach to managing housing growth as a result of no longer incorporating the medium density residential standards (MDRS), but providing for intensification in a way that complies with clause 4 of Schedule 3C of the RMA by:

- providing at least the same amount of housing capacity as would have been enabled if Plan Change 78: Intensification (PC78), as notified, was made operative, including by providing for additional intensification along selected Frequent Transit corridors and modifying zoning in suburban areas through an amended pattern of Residential - Mixed Housing Urban and Mixed Housing Suburban zones;
- enabling the building heights and densities specified in clause 4(1)(b) and (c) of Schedule 3C of the RMA within at least the walkable catchments of Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Avenue and Mount Albert Stations;
- giving effect to Policy 3 (c) and (d) of the National Policy Statement on Urban Development 2020 (NPS-UD) through intensification in other walkable catchments and land within and adjacent to neighbourhood, town and local centres;
- enabling less development than that required by clause 4(1)(b) and (c) of Schedule 3C or Policy 3 of the NPS-UD where authorised to do so by clause 8 of schedule 3C.

Section 32 requires a range of options to be considered.

33. In addition, as the SHVO qualifying matter is a qualifying matter that is "any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA and/or policy 3 of the NPS-UD inappropriate in an area", a site specific analysis is required that evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA and/or by policy 3 of the NPS-UD, while managing the specific characteristics.
34. With regards to the SHVO, site-specific analysis undertaken included geospatial analysis to identify locations where zone building heights (based on updated application of zones) would enable intrusion into the viewshaft, as well as expert landscape assessment informed by site visits. The landscape assessment is included as **Appendix 1** to this report.
35. A number of reasonably practicable options have been considered with respect to the management of the SHVO relative to the need to provide for intensification as directed by the NPS-UD. These options were narrowed down to three for further evaluation as part of this report, which are considered to be appropriate given the scale and significance of the issues.
36. The three options that have been evaluated in the section 32 and Schedule 3C assessment of the SHVO qualifying matter are:
- **Option 1:** Apply Policy 3(d) in part and extend the 8m height area within Chapter D20A as a qualifying matter (*preferred*).

This option would retain the mapped 8m height area and extend it where new MHU zoning is proposed and the viewshaft is less than or equal to 12m above ground

level. The 6-storey THAB zone would be introduced to those portions of the identified the Policy 3(d) area surrounding Howick Town Centre where located within the SHVO and the viewshaft plane is greater than 22m above ground level, however would not be applied where the viewshaft plane is less than 22m above ground level.

- **Option 2:** Apply Policy 3(d) and retain Chapter D20A as a qualifying matter, including extension to the 8m height control area.

This option would introduce 6-storey THAB zone throughout the Policy 3(d) area surrounding Howick Town Centre, and retain and extend the mapped 8m height area where (a) new MHU zoning is proposed and the viewshaft plane is less than or equal to 12m above ground level and (b) new THAB zoning is proposed and the viewshaft plane is less than or equal to 22m above ground level.

- **Option 3:** Apply Policy 3(d) and do not apply Chapter D20A as a qualifying matter.

This option would introduce 6-storey THAB zoning throughout the Policy 3(d) area surrounding Howick Town Centre, and would not apply the mapped 8m height area to manage the qualifying matter.

37. Other options that were considered and subsequently discounted included:

- The introduction of a second mapped 11m height area that would apply only to areas within the proposed 6-storey THAB Zone. This option was discounted as the benefit to development capacity in doing so would be limited and it would add additional complexity to the interpretation and implementation of the plan.
- The removal of the mapped 8m height area in favour of applying viewshaft contours across the full extent of the viewshaft. Whilst this option may have some benefits, further, more detailed investigation would be required that is likely to go beyond the scope of PC120.

Consequences for development capacity

38. The consequence for the provision of development capacity by accommodating the SHVO qualifying matter differs between options. However, the primary consequence is to restrict building heights within the mapped 8m height area, requiring restricted discretionary activity consent where development is proposed which exceeds this height.

39. In both Options 1 and 2, the mapped 8m height area would predominantly be applied to sites located along the ridge coinciding with Mellons Bay Road (where the viewshaft plane relative to ground level is lowest). This area is also identified as otherwise appropriate for application of the proposed 6-storey THAB zone commensurate with the level of commercial activity and community services, as directed by Policy 3(d) of the NPS-UD.

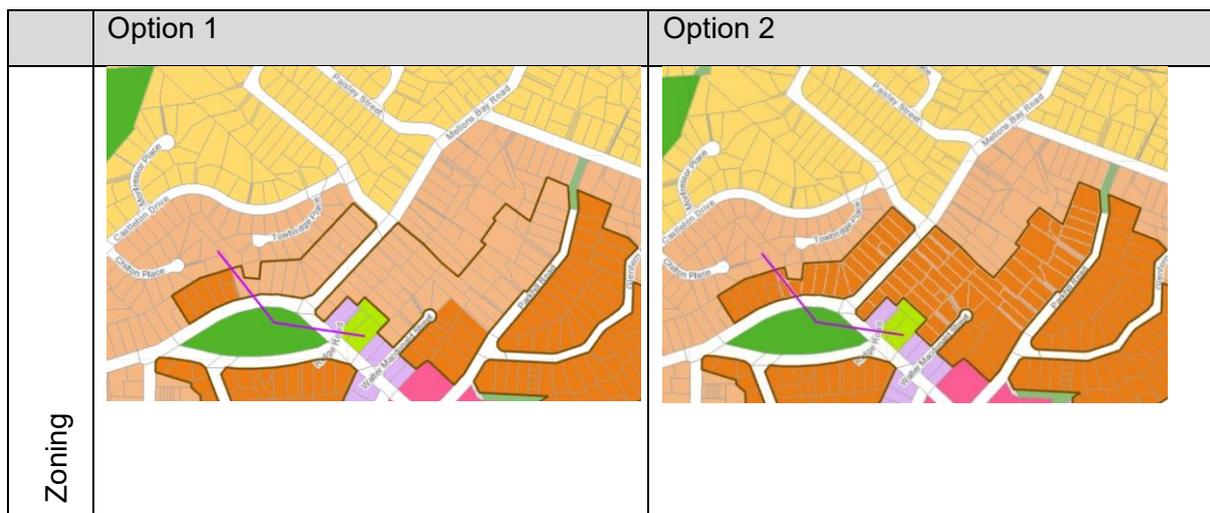
40. The primary point of difference between these two options from a development capacity perspective is that Option 2 relies in part on the application of zones to manage the qualifying matter, whereas Option 1 fully implements the spatial application of zones and relies on further extensions of the mapped 8m height area to manage potential intrusions into the viewshaft.

41. Table 3 below provides a breakdown of sites located within the Policy 3(d) area under the SHVO, in terms of application of zones and the 8m mapped height area. This provides an important point of comparison between Options 1 and 2.

Table 3 Number of sites within Policy 3(d) area under the SHVO

	Option 1	Option 2
Proposed MHU with 8m height area applied	23	0
Proposed MHU without 8m height area applied	35	0
Proposed 6-storey THAB with 8m height area applied	0	50
Proposed 6-storey THAB without 8m height area applied (additional – Option 2 relative to Option 1)	N/A	8

42. The difference in spatial application of zones between Options 1 and 2 is also shown in **Figure 2** below.



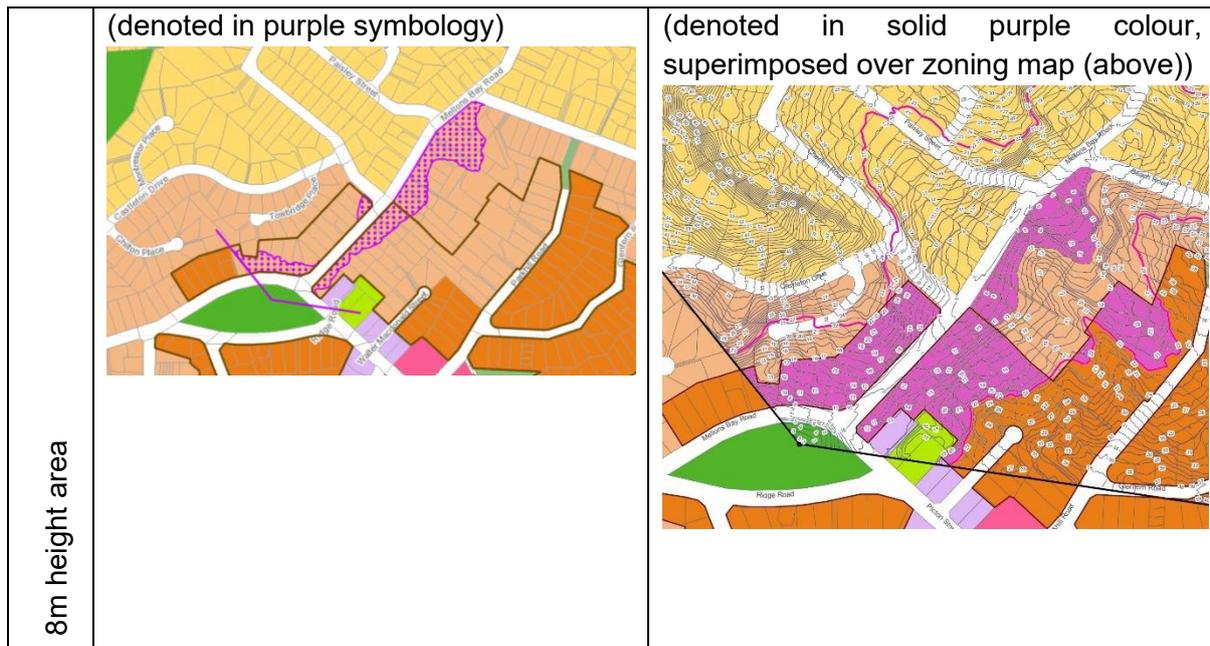


Figure 2. Application of zones and the 8m height area – Options 1 and 2

43. The methods in Options 1 and 2 have somewhat different effects on the provision of development capacity within the identified Policy 3(d) area as discussed below. Note both Options 1 and 2 would have a negative impact on the provision of development capacity relative to the uninhibited application of Policy 3(d), however Table 4 below compares the relative impact between these two options.

Table 4 Comparison of effects on development capacity – Options 1 and 2

	Positive effect on development capacity (relative)	Negative effect on development capacity (relative)
Option 1	<ul style="list-style-type: none"> - In areas where the viewshaft plane is less than 22m above existing ground level, application of the MHU Zone would provide for greater building heights than application of the mapped 8m height area. This has a positive effect on development capacity compared to Option 2. 	<ul style="list-style-type: none"> - Application of zones is based on legal cadastral boundaries. As such, where only part of the site is less than 22m below the viewshaft plane, not rezoning to THAB means the balance of the site is not able to utilise THAB development standards. This has a negative effect on development capacity compared to Option 2. - Application of MHU Zone rather than THAB Zone in certain areas means that those sites would not be able to benefit from the additional density enabled by other THAB development controls (yards, coverages, etc). This has a negative effect on development capacity compared to Option 2.
Option 2	<ul style="list-style-type: none"> - The mapped 8m height area responds more directly to ground contours beneath the viewshaft plane, meaning that some sites would be able to take advantage of THAB building heights across part of the site where not located within the mapped 8m height area. This 	<ul style="list-style-type: none"> - In areas where the viewshaft plane is less than 22m above existing ground level, application of the mapped 8m height area restricts building heights to a greater degree than application of the MHU Zone would. This has a negative effect on development capacity.

	<p>has a positive effect on development capacity compared to Option 1.</p> <ul style="list-style-type: none"> - Within mapped 8m height area, able to still utilise THAB development standards (except for height) such as yards and coverages. This has a positive effect on development capacity compared to Option 1. - Outside of the mapped 8m height area, able to <i>fully</i> utilise THAB development standards. This has a positive effect on development capacity compared to Option 1. 	
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44. It is expected that the consequence to development capacity of identification of the SHVO as a qualifying matter would be similar between Options 1 and 2. Note that Option 3 would have no effect in this regard, as Policy 3(d) would be applied to the area in full.

45. Despite the above, the effect of the SHVO qualifying matter on development capacity is of a relatively limited scale. As such, this effect is likely to be felt locally.

Evaluation of options

46. To determine the most appropriate response for SHVO as a qualifying matter, each of the options needs to be evaluated in the context of the objectives and of clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD.

47. The scale and significance of the issues are assessed as being minor, which forms the envelope within which costs and benefits are to be evaluated and considered.

Table 5 Evaluation of options

Qualifying matter	Option 1	Option 2	Option 3
Costs			
Costs of applying QM – housing supply / capacity	<p>Moderate cost</p> <p>As discussed above.</p>	<p>Moderate cost</p> <p>As discussed above.</p>	<p>No cost</p>
Costs: Social	<p>Low-moderate cost</p> <p>There are social costs (albeit limited) to limiting the number of individuals able to live and work in close proximity to the Howick Town Centre.</p>	<p>Low-moderate cost</p> <p>There are social costs (albeit limited) to limiting the number of individuals able to live and work in close proximity to the Howick Town Centre.</p>	<p>High cost</p> <p>Removal of the SHVO and its associated height controls would likely result in the loss of an important public amenity – being views to the coastal environment from a well trafficked and valued public open space and heritage place.</p>

Qualifying matter	Option 1	Option 2	Option 3
Costs: Economic (not otherwise covered by housing capacity issues)	<p>Moderate cost</p> <p>There are some costs to economic activity resulting from some dispersal of development further from the Howick Town Centre.</p> <p>Some costs to plan users and Council in interpreting and implementing the provisions.</p>	<p>Moderate-high cost</p> <p>There are some costs to economic activity resulting from some dispersal of development further from the Howick Town Centre.</p> <p>There are costs to plan users and Council in interpreting and implementing the provisions, particularly the possible disconnect between objectives and policies of the THAB zone and the application of the mapped 8m height area over the top.</p>	<p>Low cost</p> <p>No administrative and/or resource consenting costs associated with implementing provisions.</p> <p>However, there may be some cost to economic activity associated with reduction in local visitors to appreciate the views, were buildings to begin to encroach into the viewshaft.</p>
Costs: Environmental	<p>Low cost</p> <p>Some cost (albeit limited) in greater emissions associated with dispersal of business/residential activities locating further from the centre/transport options.</p>	<p>Low cost</p> <p>Some cost (albeit limited) in greater emissions associated with dispersal of business/residential activities locating further from the centre/transport options.</p>	<p>Moderate-high cost</p> <p>Would result in loss of the connection the community has with their local landscape and environment, particularly appreciation of the coastal environment.</p>
Benefits			
Benefits of applying the QM - social	<p>High benefit</p> <p>Contributes to the connection the community has with the local landscape and coastal environment.</p>	<p>High benefit</p> <p>Contributes to the connection the community has with the local landscape and coastal environment</p>	<p>Low-moderate benefit</p> <p>Some benefit in enabling more development to occur close to the centre.</p>
Benefits - economic	<p>Low-moderate benefit</p> <p>There are likely to be some benefits to economic activity expected associated with visitors to the viewing point.</p>	<p>Low-moderate benefit</p> <p>There are likely to be some benefits to economic activity expected associated with visitors to the viewing point.</p>	<p>Moderate benefit</p> <p>Administrative costs to applicants and Council will decrease, as development will not need to consider potential effects of intrusion into the viewshaft.</p> <p>Some additional development enabled near Howick Town centre, with associated economic benefits to businesses etc.</p>
Benefits – environmental	<p>Moderate-high benefit</p> <p>Would support the connection the local community has with their local landscapes and environment, particularly appreciation of the coastal environment.</p>	<p>Moderate-high benefit</p> <p>Would support the connection the local community has with their local landscapes and environment, particularly appreciation of the coastal environment.</p>	<p>Low benefit</p> <p>Some benefit (albeit limited) in reduced emissions associated with greater consolidation of business/residential activities adjacent to the centre.</p>

Analysis

48. Options 1 and 2 are considered to be very similar in terms of costs and benefits, although Option 1 is considered to have a slight advantage in that there are likely to be slightly lower costs to interpreting and implementing the provisions. Options 1 and 2 are also expected to be similar in terms of their impact on development capacity, albeit with a slightly different spatial distribution within the very localised area of interest.
49. While Option 3 would provide for full implementation of policy 3 of the NPS-UD within these areas, this option would generate considerable cost associated with the potential loss of the views which Chapter D20A seeks to manage.
50. On balance, it is considered that Option 1 is the most appropriate method for achieving the purpose of PC120 and the direction afforded by Chapters B4 and D20A of the AUP. The SHVO is an important element of local identity, and its removal would have a high cost to social and environmental outcomes.

Risks of acting or not acting

51. Section 32(2)(c) of the RMA requires this evaluation to assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. The risk of not acting, which allows for the development to build through the viewshaft and height limits, could have a significant cost to social and environmental outcomes. As this is a significant local control, it contributes to a well-functioning urban environment that provides social well-being and achieves environmental outcomes.
52. The risk of acting, which means retaining SHVO as a qualifying matter, provides for better environmental outcomes whilst still making the AUP able to meet both Objective 1 and 2 of the NPS-UD.

Effectiveness and efficiency

53. Based on an evaluation of the various options, it is considered that Option 1 above would most effectively and efficiently manage the values of the SHVO whilst managing potential effects on development capacity of the three options. This option strikes an appropriate balance between the need to enable development capacity adjacent to the Howick Town Centre and the need to manage values associated with the SHVO qualifying matter.
54. Both Options 1 and 2 can effectively manage the values of the SHVO qualifying matter, however there are some inefficiencies with both options. In the case of Option 1, this arises from the application of the MHU zone to sites within the Policy 3(d) area where development would otherwise be able to benefit from more enabling standards (yards, coverages) via provisions of the THAB Zone. In the case of Option 2, this arises from (a) restricting heights in the proposed THAB Zone to 8m in certain areas where application of MHU zoning instead could enable greater height without enabling intrusions into the viewshaft, and (b) there is a cost to efficiency in terms of plan usability, as well as of interpreting and implementing the plan, largely associated with the disconnect between the outcomes sought by the THAB zone and that sought through application of the 8m height area.

55. Option 3 would not manage building intrusions into the viewshaft, thereby enabling an associated erosion of identified SHVO values over time. As such, this option would not effectively manage the values of the SHVO. In terms of efficiency, Option 3 would enable the most development capacity of all options assessed, however this would be tempered by the significant cost associated with the loss of social and environmental values of the SHVO.

Description of how the qualifying matter is to be implemented

56. It is proposed that the SHVO is retained as a qualifying matter, enabling Chapter D20A to continue to manage views through application of the overlay and associated provisions, including those discussed in Section 4 of this report.

57. It is proposed that the mapped 8m height area overlay is expanded to encompass additional areas proposed to be rezoned to MHU where the zone heights and ground contours would otherwise enable intrusions into the viewshaft. It is also proposed that certain sites within the Policy 3(d) area are zoned MHU rather than THAB, where the heights and densities provided by the proposed THAB zone would be inconsistent with the values of the SHVO qualifying matter.

Overall conclusion

58. Chapter D20A Stockade Hill viewshaft is a qualifying matter under Clause 8(1) of Schedule 3C which includes 'any other matter that makes higher density, as specified by clause 4(1)(b) or policy 3, inappropriate in an area, but only if subclause (4) is satisfied.' Subclause (4) requires an evaluation report.

59. As identified above, the benefits associated with retaining the controls under Chapter D20A outweigh the cost to development capacity enabled by Policy 3 in areas where the qualifying matter applies.

60. It is considered that the approach proposed strikes an appropriate balance between the costs and benefits, and is an effective and efficient means of providing for the management of SHVO values whilst enabling development capacity required by Policy 3 of the NPS-UD where it will not be incompatible with these values.

Appendices

- **Appendix 1.** Proposed Plan Change 120 Landscape Assessment – Local Public Views, Stockade Hill Viewshaft, and AWMM Viewshaft Overlays, prepared by Melean Absolum Ltd.
- **Appendix 2.** List of Sites Impacted by SHVO qualifying matter (preferred option)

Information Used

1. The following reports, documents, evidence, and plan versions were used to help the development of the plan change and assess Chapter D20A Stockade Hill Viewshaft Overlay as a qualifying matter.

Name of document, report, plan	How did it inform the development of the plan change
Landscape Assessment – Stockade Hill Viewshaft Overlay, prepared by Melean Absolum Ltd.	Expert landscape assessment supporting the s32 report.
Auckland Unitary Plan (Operative in Part 2016)	Chapters B4 Natural Heritage and D20A Stockade Hill Viewshaft Overlay provisions reviewed and considered in assessment of views and restrictions on development. AUP maps and Schedule 11 identify locations of the viewshafts.
Proposed Change 3 Protection of Views from Stockade Hill, Howick – Statutory Assessment Report	Considered in the development of the s32 report.
Auckland Council Decision following the hearing of a Plan Modification under the Resource Management Act 1991 – Plan Change 3: Protection of Views from Stockade Hill, Howick	Considered in the development of the s32 report.

Consultation summary

2. Limited consultation on PC 120 has been undertaken, and this is detailed in the Auckland Council September 2025 reports entitled:
 - a. Consultation and Engagement on a Proposed Plan Change Potentially Replacing Proposed Plan Change 78 – Intensification Summary Report
 - b. Māori Engagement Consultation Summary Report

APPENDIX 1. Proposed Plan Change 120 Landscape Assessment – Local Public Views, Stockade Hill Viewshaft, and AWMM Viewshaft Overlays, prepared by Melean Absolum Ltd.

PROPOSED PLAN CHANGE 120
[Housing Planning Instrument]
LANDSCAPE ASSESSMENT

LOCAL PUBLIC VIEWS
STOCKADE HILL VIEWSHAFT &
AWMM VIEWSHAFT OVERLAYS



For Auckland Council

MELEAN ABSOLUM LIMITED
Landscape Architects

September 2025



CONTENTS

1	INTRODUCTION	3
2	STATUTORY CONTEXT	3
3	AUCKLAND WAR MEMORIAL MUSEUM VIEWSHAFT	5
4	STOCKADE HILL VIEWSHAFT	8
	4.1 Background	8
	4.2 Existing provisions	9
	4.3 Values of the View	10
	4.4 Effects of Policy 3(d) NPS-UD	10
5	LOCAL PUBLIC VIEWS	15
	5.1 Pilkington Road, Te Kopua Kai a Hiku	16
	5.2 Queens Road, Te Kopua Kai a Hiku	19
	5.3 Selwyn Road / The Glebe, Howick	20
	5.4 St Johns Redoubt, Manukau	25
6	SUMMARY	31

1 INTRODUCTION

Melean Absolum Limited (MAL) has been asked by Auckland Council to assist in the role of landscape expert, in the assessment of three overlays in the Auckland Unitary Plan (Operative in Part) (AUP). This assessment is to support s32 and Schedule 3C assessments of the Resource Management Act (RMA) for proposed Plan Change XX to the AUP.

This report sets out the values of the overlays; provides a brief description of the various locations where each of the overlays applies; and considers the potential adverse effects of the level of development enabled by the proposed Plan Change on the protected values. Recommendations are made on whether the additional height or density can be accommodated without adverse landscape effects; whether removal or amendment of the extent of the overlay should be made; or whether the overlay should be accepted as a qualifying matter (QM) in terms of the National Policy Statement for Urban Development 2020 (NPS UD).

2 STATUTORY CONTEXT

In undertaking this assessment I have had regard to the Objectives and Policies of the Regional Policy Statement of the AUP. Under B4 Te tiaki taonga tuku iho - Natural Heritage are objectives and policies related to the protection of viewshafts. Of relevance to this assessment are:

"B4.3.1 Objective (2)

(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

(5) Identify and evaluate a view from a public place to the coastal environment, ridgelines and other landscapes 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 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 natural landscape;*
 - (d) the view recognises the importance of the landscape to Mana Whenua; and*
 - (e) the extent to which there are other similar public views; and*
 - (f) taking into account the extent to which the viewshaft will affect future development otherwise enabled by this Plan.*
- (6) Include a view in Schedule 11 Local Public View Schedule if it is locally significant."*

As well as the RPS provisions in the AUP, I have also had regard to the provisions of Chapters D16 Local Public Views, D19 Auckland War Memorial Museum Overlay, and D20A Stockade Hill Viewshaft Overlay.

D16 LOCAL PUBLIC VIEWS

Of particular relevance to this assessment is Policy D16 3.1 which reads:

Identify and evaluate significant local public viewshafts using the following criteria:

- (a) the extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape;*
- (b) the community association with, or public appreciation of, the values of the viewshaft;*
- (c) the visual coherence, unity or integrity of the viewshaft and its view; and*
- (d) the potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates.*

As part of my assessment I have carefully considered these criteria, along with the RPS factors above.

D19 AUCKLAND WAR MEMORIAL MUSEUM VIEWSHAFT

Both the single objective and single policy deliberately use strong wording:

D19.2. Objective

Significant views to and from the Auckland War Memorial Museum are protected.

D19.3. Policy

Prevent the visual intrusion of buildings and structures into current identified views to and from the museum.

These provisions indicate the importance of the viewshaft, particularly the 'prevent' provision. I have taken this into account in my consideration of the viewshaft.

D20A STOCKADE HILL VIEWSHAFT

The objectives and policies in this chapter repeat those in D16 Local Public Views. I have again given consideration to the listed criteria in the following assessment.

3

AUCKLAND WAR MEMORIAL MUSEUM VIEWSHAFT

The Auckland War Memorial Museum (AWMM) viewshaft was rolled over from two legacy plans, namely the Auckland City (Isthmus and Central Area Sections) District Plans. It appeared in both because its origin was within the Isthmus Section, while its control applied in the Central Area.

The viewshaft is unusual in two ways. Firstly, it is intended to protect views both to and from the Museum building. This is an important distinction between this and other protected viewshafts. The viewshaft protects views of the city and harbour from the Museum, an important and popular local and tourist destination.

By covering a substantial part of the main shipping channel between Maungauika (North Head) and Takaparawha (Bastion Point), it also protects views to the Museum from the water, so that visitors arriving by ship, recreational boats and ferry passengers can all enjoy views of this important heritage building which has architectural and community significance. By happy coincidence this also protects views of the Museum from Devonport and other locations across the water north of the end of the viewshaft.

Secondly, the viewshaft is in three adjoining parts. The western part of the viewshaft sets a 1:40 gradient from the origin on the bottom step of the Museum over the eastern CBD and port area, terminating in the sea between the port and Devonport. The eastern part of the viewshaft sets a less steep gradient, 1:54.7, over the Parnell ridge, before again, terminating in the sea. Between these two planes is a transition plane, that essentially slopes between the 1:40 and 1:54.7 planes, enabling the allowable building height contours in the eastern and western parts to join up, as shown below.

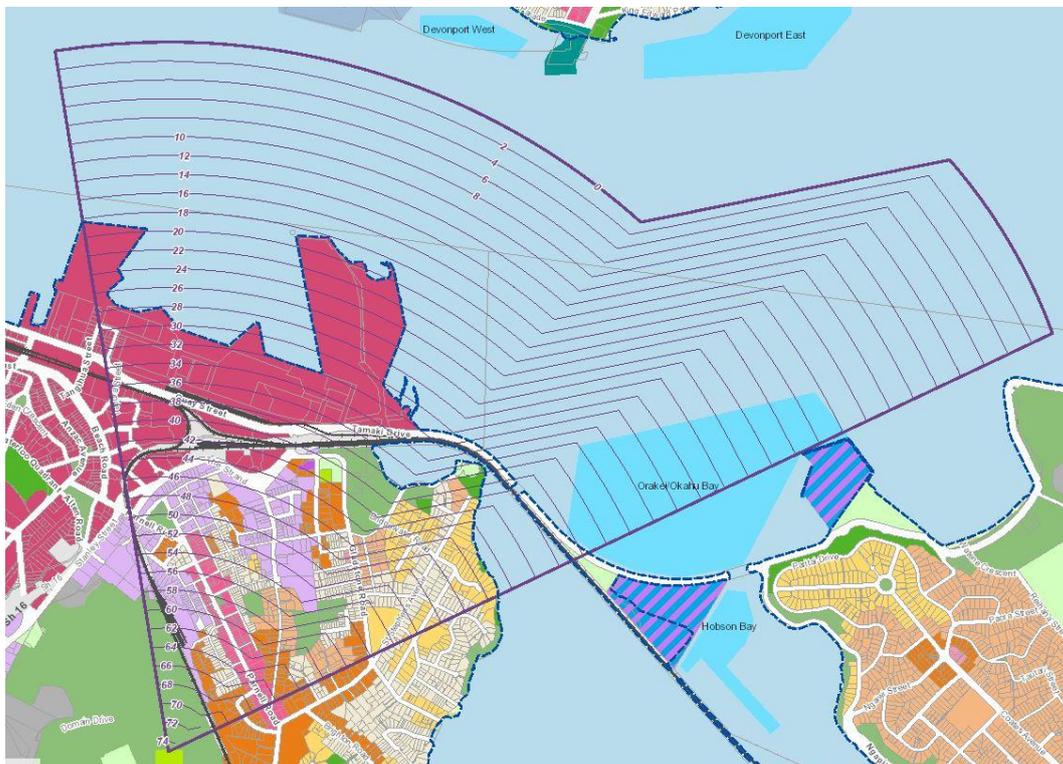


Figure 1 The AWMM Viewshaft

Standing on the origin point on the Museum steps one can get a panoramic view extending from the taller buildings in the CBD emerging above the pohutukawas along Domain Drive, in the west; past Bayswater Peninsula, Stanley Point, the waters of the Waitemata Harbour, the tall container cranes at the port, the eastern side of Rangitoto; right round to buildings along St Stephens Avenue. These are identifiable in **Photograph 1**, overleaf, by the spire of Bishopcourt in front of the damaged but re-grown Norfolk Island pine tree with the four tall chimneys of Neligan House just beyond. Properties along the northern road frontage of St Stephens Avenue are excluded from and lie immediately south of the viewshaft.

Although much of the harbour is hidden from view from the origin point, it is important to remember that this viewshaft works in two directions. The tall northern face of the Museum immediately behind the origin point rises a considerable height and is visible above the trees in the Domain from much of the inner harbour.

In considering the potential impacts on development potential that the AWMM viewshaft would impose, it is important to note that much of the viewshaft is also covered by three regionally significant Maunga Viewshafts which have been identified through PC120 as QM.

Three different options are being considered in the s32 and Schedule 3C evaluation report in relation to this viewshaft:

- Retain the viewshaft as in the AUP and accept it as a QM in terms of the NPS UD; or
- Retain the viewshaft as a QM but reduce its width on the southern edge, to exclude that area not covered by a regionally significant Maunga Viewshaft; or
- Do not apply the viewshaft as a QM.

In assessing these three options I have concluded that, undoubtedly, the AWMM viewshaft is of regional, if not national, importance. The Museum building is a listed Category 1 heritage building with Pouhere Taonga, Heritage New Zealand. As noted on their website:

"The Auckland War Memorial Museum is one of the largest neoclassical buildings in Australasia. It stands as a prominent memorial to the many Aucklanders and other northern New Zealanders who fell in two world wars, exhibiting a strong New Zealand identity through its architecture and function. Constructed on a site of significance to Maori, previously known as Pukekawa, it overlooks the city centre from the Auckland Domain, a major city park. The building was initially erected in 1924-1929 through government and public subscription, as a monument of practical benefit to communities affected by war. It commemorated those from Auckland Province who died in the First World War, as well as providing a suitable home for the Auckland Institute and Museum."

In my opinion, development that intruded through the floor of the viewshaft would have significant adverse landscape effects.

Although Option 2 would provide for some additional development, compared with Option 1, it would be at the expense of an important part of the viewshaft. The southern portion of the viewshaft, which would be largely lost in Option 2, extends out to a line between Takaparawha and Maungauika. As cruise ships and ferries approach the inner Waitemata Harbour from the Rangitoto Channel, they cross this line and get their first views of Auckland CBD and the Museum. Were development to intrude in front of the museum building in such views, this would, in my opinion undermine an important element of Auckland's identity.



Photograph 1 View of the AWMM Viewshaft from the Museum steps

Option 3 has the potential effect of completely masking the museum building in from views to and from the inner harbour over time. These views have been identified as regionally significant and, in my opinion, should continue to be protected in PCXX by the viewshaft being identified as a QM.

RECOMMENDATIONS

In light of the cultural, heritage and landscape significance of the AWMM viewshaft overlay, I recommend its retention, in terms of control on the height of development, and its recognition as a QM in PCXX.

4 STOCKADE HILL VIEWSHAFT

4.1 BACKGROUND

The Stockade Hill Viewshaft Overlay (SHVO) provisions can be found in D20A of the AUP. The overlay arose as a result of community led submissions to the Independent Hearing Panel (IHP) on the Proposed Unitary Plan and subsequent settlement of appeals to Plan Change 3 (PC3) to the AUP.

As the name suggests, Stockade Hill is the site of a defensive redoubt built in 1863 to protect local settlers, in the event of a Maori uprising. After it was decommissioned and the buildings removed, a monument commemorating WW1 was erected in 1921 in the centre of the area enclosed by the stockade embankments. Also within the embankments is a trig station (SO 28853) erected in 1936 and a flagpole. A straight path crosses the middle of the embankments on the western and eastern sides, meeting at the war memorial in the middle. The western end of this path is flanked by a ceremonial avenue of pin oak trees (*Quercus palustris*).

Outside the embankment on the eastern side is a toposcope, beside which is the origin of the viewshaft. These features can all be seen in the aerial photograph in **Photograph 2**, below.



Photograph 2 Aerial photograph of the top of Stockade Hill

4.2 EXISTING PROVISIONS

As already noted, the existing provisions include identical objective and policies as those found in D16, the Local Public View (LPV) overlay. Additionally, the standards restrict buildings to an 8m height limit within the area illustrated in D20A.6.1.1, as shown in **Figure 2** below. Buildings exceeding this height limit are to be considered as restricted discretionary activities with corresponding assessment criteria being applied.

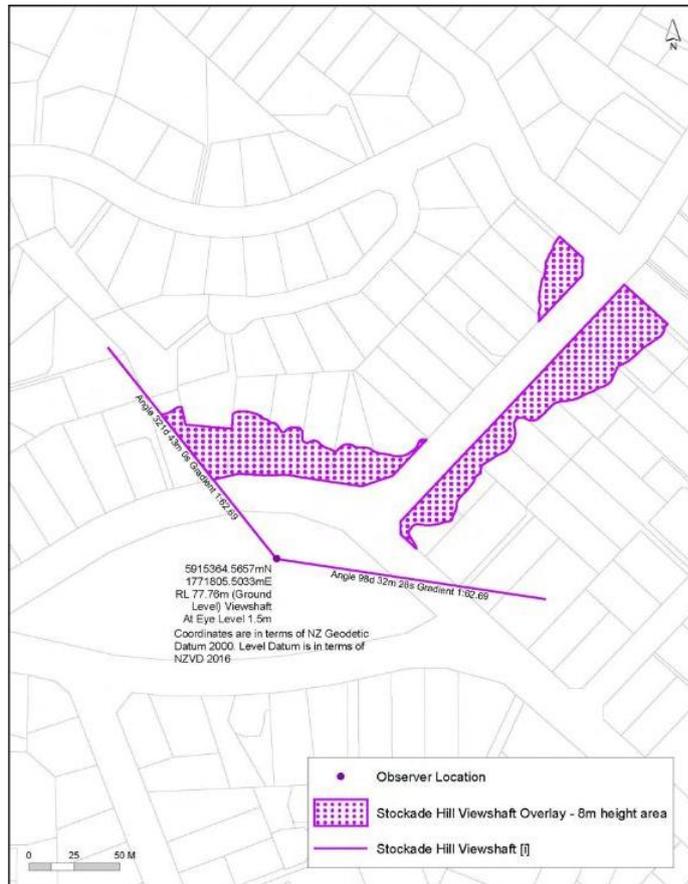


Figure 2 D20A.6.1.1 in the AUP

Despite the breadth of the Stockade Hill Viewshaft, ($136^{\circ} 49' 29''$), the landform within it, together with the height restrictions applying to the residential zones under it, only a small area either side of Mellons Bay Road needed to have the 8m height restriction in order to protect the view from the summit of Stockade Hill.

4.3 VALUES OF THE VIEW

The purpose of the Stockade Hill viewshaft is described in the AUP provisions as:

“This overlay is used to restrict building heights to ensure that new development is of a height that does not intrude into or obstruct views to the coastal environment.”

In considering the Stockade Hill Viewshaft in terms of the criteria in Policy D16 3.1 I provide the following assessment table:

<i>a</i>	<i>the extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape;</i>	Wide view of inner Gulf including Beachlands and Motukaraka Island. It provides clear legibility of relationship between Howick and the coast.
<i>b</i>	<i>the community association with, or public appreciation of, the values of the viewshaft;</i>	Originally nominated by the local community, so appreciated by them. Also the origin of the viewshaft is in a popular local heritage site.
<i>c</i>	<i>the visual coherence, unity or integrity of the viewshaft and its view; and</i>	The viewshaft provides a coherent view enabling an understanding of the geomorphology of the area and the Gulf and islands beyond.
<i>d</i>	<i>the potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates.</i>	Strong historic associations with Stockade Hill. Opportunities for additional interpretation referring to the view from the stockade.

Table 1 Stockade Hill viewpoint assessment against Policy D16.3.1

Overall, I conclude that views from Stockade Hill that encompass the Hauraki Gulf and many of its islands continue to meet the criteria for the scheduling of local public views in the AUP.

4.4 EFFECTS OF POLICY 3(d) NPS-UD

PC120 proposes to up-zone areas within the viewshaft overlay from Single House Zone (SHZ) to either Mixed Housing Suburban, (MHS), or Mixed Housing Urban, (MHU), and from MHU to a modified Terrace Housing and Apartment Building (THAB) zone, in response to the identification of Policy 3(d) areas. To calculate the potential effects of the additional height thus enabled, the floor of the viewshaft has been modelled in relation to the ground level beneath it, illustrated by means of contours.

As shown in **Figure 3** overleaf, the contours illustrate that there are two areas where either:

- the gap between the viewshaft and the proposed THAB zone is less than the 22m maximum building height¹; or
- the gap between the viewshaft and the proposed MHU zone is less than 12m maximum building height.

¹ 22m being the maximum building height of the modified THAB zone.

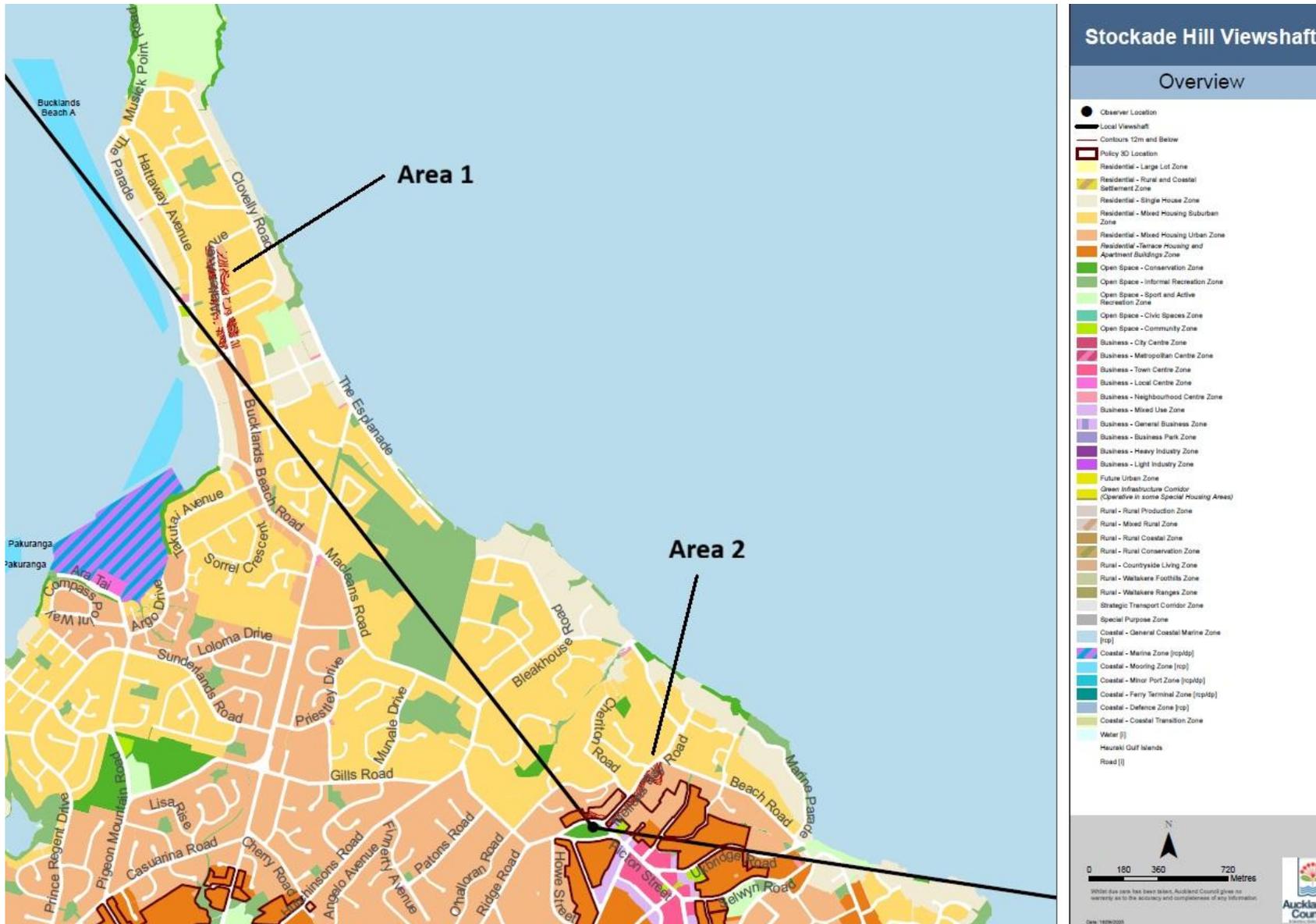


Figure 3 Stockade Hill Viewshaft Contours, Areas 1 and 2

The areas are identified as:

- Area 1 – an area within the Musick Point Peninsula;
- Area 2 - the area already covered by the existing provisions but extended further north-east along Mellons Bay Road.

Area 1 is also covered by the Regionally Significant Volcanic Viewshaft and Height Sensitive Areas Overlay and so no additional height is anticipated in this area by virtue of that separate QM.

The extension of Area 2 north-east of Cheriton Road is currently zoned Residential - Single House (SH). The remainder of Area 2 is currently zoned MHU and is already partially covered by the existing AUP 8m height limit.

Additionally, Area 2 was examined in more detail, as shown in **Figure 4**. The pink line on the plan marks the 22m contour, which is the point at which development enabled by the proposed THAB zone could break through the viewshaft floor. As a result, no properties within the red line area are recommended to be zoned THAB. The brown line indicates the extent of the identified Policy 3(d) area which would, without the overlay, be zoned THAB.

Indicated in **Figure 4** is a small area, on the eastern side of Mellons Bay Road between Cheriton Road and Paisley Street, where the contours shown are either 6m or 7m. In these areas there is potential for development to break through the floor of the viewshaft, but to remain within the 8m height control.

I have carefully considered whether a more restrictive height limit should be imposed in this area to ensure buildings do not penetrate the floor of the viewshaft. I have concluded that this additional control is not necessary for the following reasons:

- the area concerned only covers potential building sites² on two properties, a small area within the breadth of this viewshaft overlay;
- reducing the potential height for development below what is currently enabled in the AUP would be unacceptable; and
- adding an additional height control area would make the AUP provisions unnecessarily complicated.

RECOMMENDATIONS

In my opinion the Stockade Hill Viewshaft is worthy of identification as a QM under PC120, together with the restrictions to the extent of the THAB zone and the extension of the 8m height control areas where the proposed MHU zoning would enable development through the floor of the viewshaft, as discussed above, and shown in **Figures 4** and **5** overleaf.

² I have assumed that small corner areas, narrow road frontages and accessways in the height control area will not have buildings proposed on them.

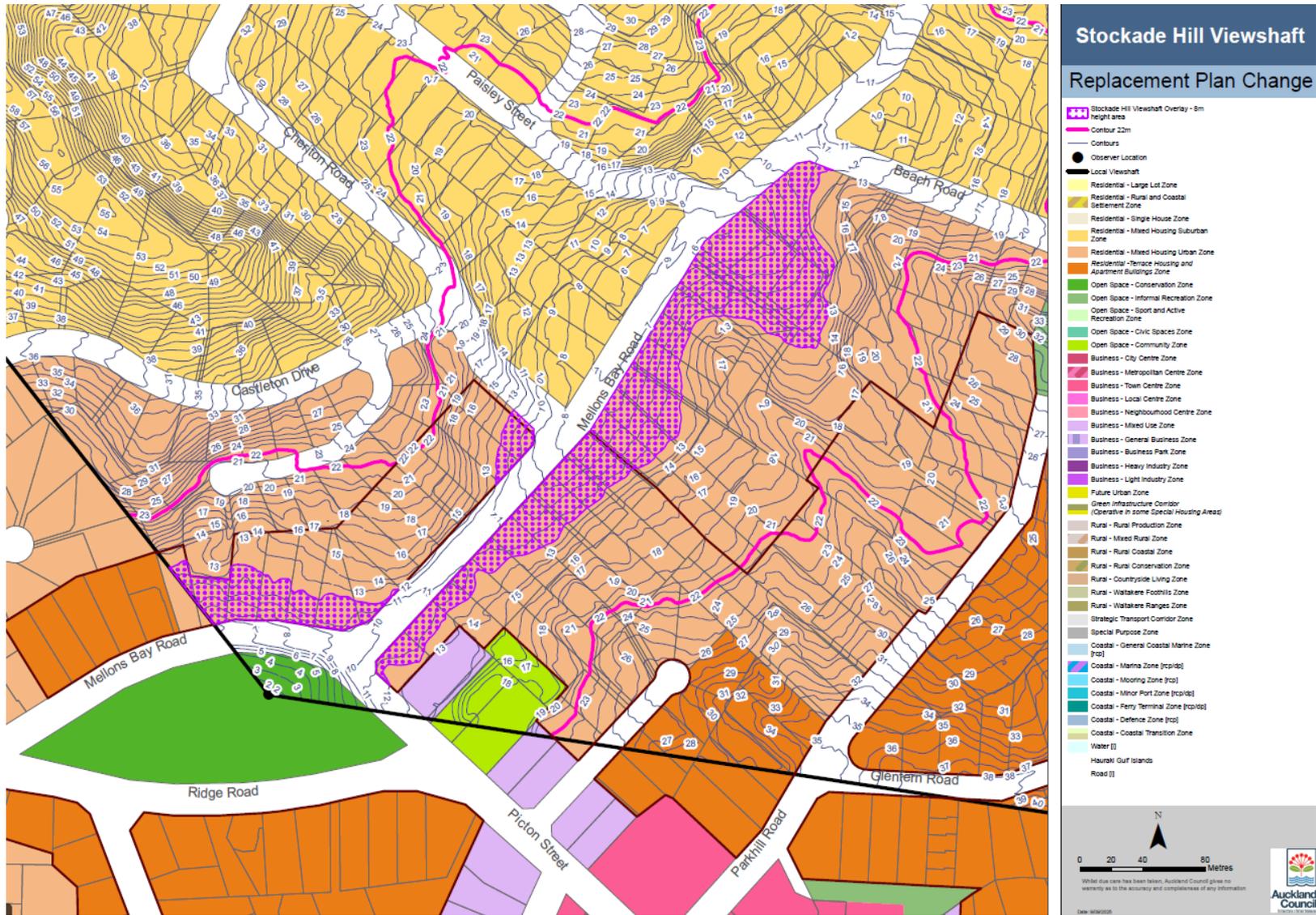
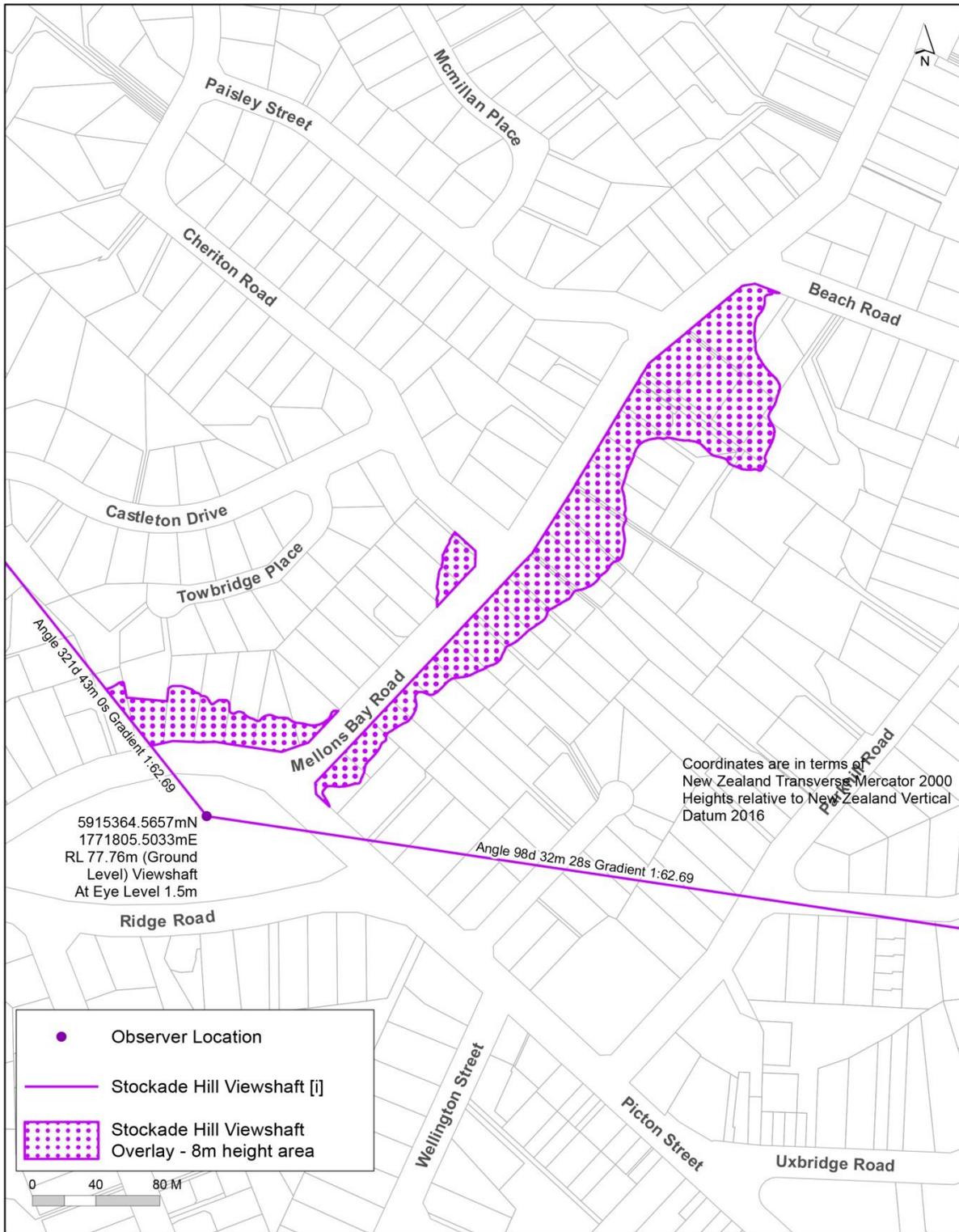


Figure 4 Stockade Hill Viewshft with contours (Area 2)



Stockade Hill Viewshaft Overlay – Building height



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Figure 5 Stockade Hill Viewshaft Overlay, 8m height limit

5 LOCAL PUBLIC VIEWS

There are six public views protected by the Local Public View overlay (LPVO) in the AUP. The LPVO arose from provisions within both the Auckland City District Plan (Isthmus Section) and the Manukau City District Plan. Each of these TLAs had responded to concerns raised by their ratepayers that increasing development intensity threatened to obscure views of local landscape features that were important to the local community.

The geographical location of the overlays in the AUP was taken directly from the legacy District Plans, while new provisions were developed and incorporated into the AUP. Those provisions include, under D16.1 Overlay Description:

"In addition to the distinctive volcanic landscape and regionally significant outstanding natural landscapes and outstanding natural features, Auckland's wider landscape and maritime setting provides a sense of identity at the local level. Individual viewing points, and their locally significant viewshafts from public places, contribute to the unique character of many of Auckland's neighbourhoods and coastal areas. Although many significant local views are naturally self-preserved by topography or proximity to the coast and require no specific protective restrictions, some are in prominent public locations but could be obstructed by buildings occurring in the foreground. These viewing points and the views from them have been scheduled in the Local Public Views Overlay to ensure the benefits they provide are retained for future generations."

Schedule 11 in the AUP identifies each of the LPVO areas, 11.2 - 11.7. Two of the viewshafts, 11.6 and 11.7 at Queens Road and Pilkington Road, Panmure respectively, have detailed plans of their extent and specific controls which are also included in D16. The other four viewshafts are each illustrated by identification of the origin point, along with the edges of the viewshaft and notation of the angle at which the viewshaft descends.

Unfortunately, the intended extent of these viewshafts is not illustrated in either Schedule 11, or, and much more importantly, on the on-line AUP Geomaps. This makes it very difficult for anyone reading the AUP or consulting the on-line maps, to be sure whether a property is, or is not, within a LPVO. In the case of the St Johns Redoubt this problem has led to a number of developments in recent years that have been consented and constructed despite breaking through the floor of what I consider to be the intended protected viewshaft, sometimes by a considerable margin.

Of the six LPVOs, only four are potentially affected by the additional height of development enabled under the proposed plan change. This is because the other two cross only open space zoned land at Mangemangeroa Reserve on the edge of Botany, outside any area identified within Policy 3 of the NPS-UD. Although LPVO 11.6 from Queens Road to the Panmure Basin only crosses road and open space zoned land at Lagoon Pool and Leisure Centre, in Panmure, I am advised that because this area is within a Policy 3(c) walkable catchment from Panmure train station, an assessment of whether the viewshaft should be identified as QM is required.

The four relevant viewshafts are assessed below to determine whether they are likely to be interrupted by development utilising the proposed plan change provisions and the extent to

which this threat should be resisted by identifying the viewshaft as a QM, in order to protect the views for current and future generations.

To undertake this assessment, it has been necessary to determine what the actual extent of the viewshaft is intended to be, where that is not already identified in the AUP and Geomaps, and then determine if development beneath it, once developed to the proposed plan change zoning height limits, would penetrate the floor of the viewshaft. Under the AUP provisions, development which intrudes into one of the viewshafts (up through the floor) is to be assessed as a restricted discretionary activity.

In undertaking this work, it has become clear that, in the case of both the Selwyn Road/The Glebe view in Howick and the St Johns Redoubt view in Manukau, that when the viewshaft is extended to the sea, the gap between the floor of the viewshaft and the underlying ground is measured, the resulting contour lines towards the end of the viewshaft (ie away from the origin point) get very close to and sometimes penetrate, ground level. This may have arisen as a result of the identification of the angle of the view having been made last century for the legacy District Plans, before LiDAR survey information and GIS modelling were available. It might also mean that the viewshaft was never intended to extend as far as the sea. Without further information, I remain uncertain.

The implications of this are discussed in more detail in the individual viewshaft discussion below.

5.1 PILKINGTON ROAD, TE KŌPUA KAI A HIKU, PANMURE BASIN

The controls pertaining to this LPVO are illustrated in both D16.10.1 and Schedule 11 Map 11.7. The grid reference for the origin of the viewshaft is provided in the drawing and originates just north of Pleasant View Road on Pilkington Road. The viewshaft continues down Pilkington Road, crosses Queens Road and continues over one commercial building fronting Queens Road and four separate commercial properties accessed from Korma Lane. It then continues across Lagoon Drive and over the top of the Lagoon Pool and Leisure Centre and Te Kōpua Kai a Hiku, Panmure Basin itself, landing on the far shore close to Marine Lane.



It appears from the AUP GIS maps that some changes have occurred to the boundaries of the commercial properties which the viewshaft affects, when up-to-date cadastral information is compared with that shown in D16.10.1 and Schedule 11 Map 11.7. Nevertheless, there remain five properties zoned Business Town Centre (B-TC) on Korma Lane and Lagoon Drive that are crossed by this LPVO, as shown in **Figure 6**, below.

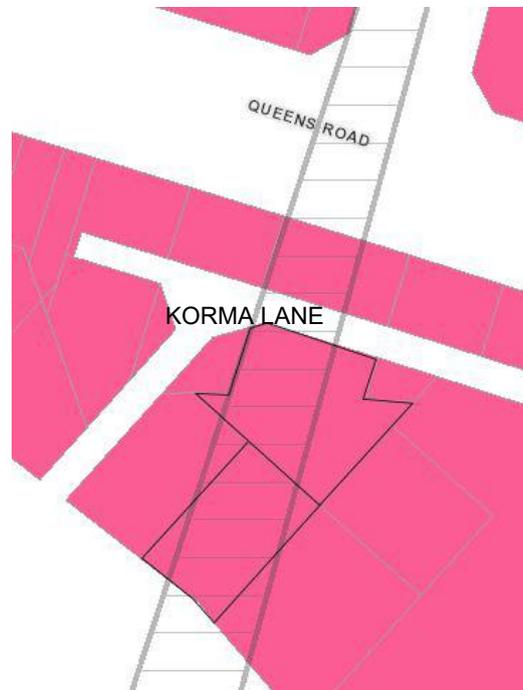


Figure 6 The Pilkington Road LPVO at Korma Lane

To the south of Lagoon Drive, the LPVO crosses the public pool zoned Open Space – Sport and Active Recreation, (OS-S&AR) with the basin beyond.

I am aware that Auckland Council is planning the demolition of the upper storey of numbers 71-79 Queens Road on the south side of the road to create the Panmure Town Square, as shown in **Figures 7 - 9** below and overleaf.³

Although this is a commendable initiative, the properties on the south side of Korma Lane remain within the viewshaft and have the potential to interrupt both the protected viewshaft and the view from the new square.



Figure 7 The Lagoon Drive frontage



Figure 8 The Korma Lane frontage

³ Taken from Our Auckland website.



Figure 9 Artist's impression from above Lagoon Road

Considering the view in terms of the AUP D16 assessment criteria, I provide the following table.

A	<i>The extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape</i>	Harder to see the Basin from the actual viewpoint but it becomes apparent as one moves downhill from the origin. This will be greatly improved by the proposed Panmure Square which will open the views considerably.
B	<i>the community association with, or public appreciation of, the values of the viewshaft</i>	The creation of Panmure Square will enhance existing opportunities for the community to appreciate the value of the view, clearly demonstrating the relationship between the settlement and the local landscape feature
C	<i>the visual coherence, unity or integrity of the viewshaft and its view</i>	Not particularly coherent view. Trees, which will continue to grow, and street lights do detract to some extent. However, trees can be managed as part of the Panmure Square development.
D	<i>the potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates</i>	Historic associations unknown, but they appear unlikely. Interpretation of the origins of Te Kōpua Kai a Hiku and its importance to Maori can be made in the new square.

Table 2 Pilkington Road viewpoint assessment against Policy D16.3.1

In my opinion, the viewshaft provides the Panmure community with a locally significant view of an important landscape feature that will only be improved by the creation of the town square. To avoid visual interruption to this, the viewshaft should be identified as a QM in PC120, in my view. I also note that both D16.10.1 and Schedule 11 Map 11.7 will need to be updated because at present they refer to the parapet of the building that is to be demolished and have out-dated cadastral information.

5.2 QUEENS ROAD, TE KŌPUA KAI A HIKU, PANMURE BASIN

The controls pertaining to this LPVO are illustrated in both D16.10.2 and Schedule 11 Map 11.6. The grid reference for the origin of the viewshaft is provided in the drawing and has its origin on the north-eastern side of Queens Road opposite the end of Basin View Lane. The view extends down Basin View Lane, crosses Lagoon Drive and open space zoned land at Lagoon Pool and Leisure Centre.



Photograph 4 The Queens Road viewshaft

As can be seen in **Photograph 4**, not only does the viewshaft provide an excellent view down to Te Kōpua Kai a Hiku, Panmure Basin, but it also provides longer views to Hamlins Hill, Mutukaroa, on the left and Mangere Mountain, Te Ara Pueru, on the right, although these important Auckland landmarks are not protected by this viewshaft.

Considering the view in terms of the AUP D16 assessment criteria, I provide the following table.

A	<i>The extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape</i>	Surprising opportunity to see the relationship of Panmure township with its volcanic basin.
B	<i>the community association with, or public appreciation of, the values of the viewshaft</i>	Viewshaft is along Basin View Lane, so strong local connections with the viewshaft.
C	<i>the visual coherence, unity or integrity of the viewshaft and its view</i>	Very narrow viewshaft is defined by the buildings either side of the road, but coherent in itself.
D	<i>the potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates</i>	The footpath on Queens Road widens at the viewshaft to facilitate its appreciation, so interpretation of any historical associations and geological formation would be possible here.

Table 3 Queens Road viewpoint assessment against Policy D16.3.1

Again, I find that the viewshaft provides the Panmure community with a locally significant view of an important landscape feature. To avoid visual interruption to this, the viewshaft should be identified as a QM in PC120.

5.3 SELWYN ROAD / THE GLEBE, HOWICK

The controls pertaining to this LPVO are illustrated in Schedule 11 Map 11.2. This LVPO has its origin at the intersection of Selwyn Road and The Glebe, in Howick, at the corner of All Saints Anglican church property. The view protected is over residential development that slopes to the north-east, allowing views to the Hauraki Gulf, Beachlands and Motukaraka Island, with Ponui and Waiheke Islands beyond.

This viewpoint, close to the centre of Howick enables an understanding of the relationship of Howick with the inner Gulf and its islands. The reasonably busy road provides the opportunity for appreciation of the view by many, including bus passengers. The view is interrupted to some extent by power poles and lines but otherwise is coherent and continues as one travels down Selwyn Road. High quality coastal landscapes that are clearly visible from close to the centre of Howick create a valuable local view, as shown in **Photograph 5**, below.



Photograph 5 The view looking towards the inner Gulf and Waiheke Island

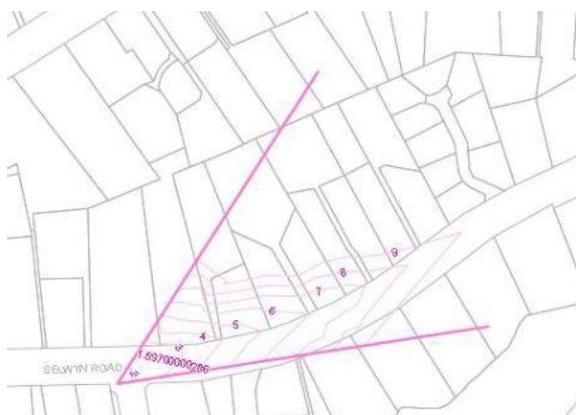


Figure 10 The Selwyn Road LPVO in Schedule 11 (left) and the AUP Geomaps (right)

As can be seen in **Figure 10**, above left, the viewshaft, as currently illustrated in Schedule 11 of the AUP, is a triangle extending approximately 180m from the origin point. It covers an area of properties all zoned R-SH, with the Nixon Park / Howick Bowling Club land on the southern

side of Selwyn Road. A total of 17 residential properties and four open spaces lots are either wholly or partially under the LPVO as illustrated. However, as already noted, the black triangle in **Figure 10** above right is probably not an accurate representation of the full extent of the view, with many more properties to the north-east of the triangle potentially sitting beneath the viewshaft.

It is clear from a comparison of the AUP map in **Figure 10** and **Photograph 5**, that the view of the Hauraki Gulf and islands extends much further than the triangle incorporated in the AUP GIS map. **Figure 12**, overleaf, is a map of the viewshaft extended along the angle denoted in Schedule 11 to the point where it meets the sea. It is a more accurate representation of the extent of the viewshaft than that shown in **Figure 10**.

As can be seen in **Figure 12**, the landform between the origin point and the sea is a valley with higher land at the north-western and southern edges of the viewshaft. The contours illustrate the distance between ground level and the floor of the viewshaft with different colours used for different groups of contours to aid legibility.

Figure 11 below, is an excerpt from the PPC120 map showing the proposed zoning in the viewshaft and down the valley below.

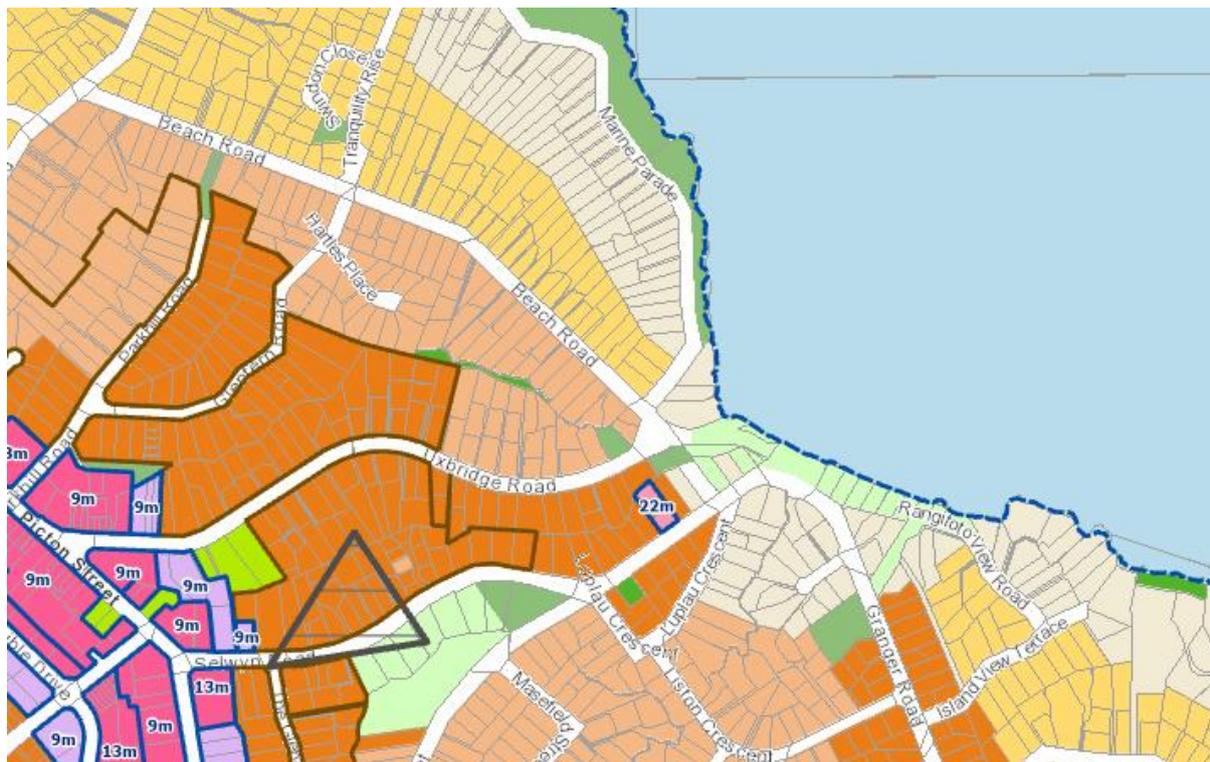


Figure 11 PC120 zoning for Selwyn Road / The Glebe viewshaft area

When comparing the proposed zoning with the contours in **Figure 12**, it is clear that development up to 22m in either the THAB zone or the single Neighbourhood Centre zoned property,⁴ exceeds the space available indicated by the contours. As well as this, there are

⁴ Which has a height variation control enabling development up to 22m as well.

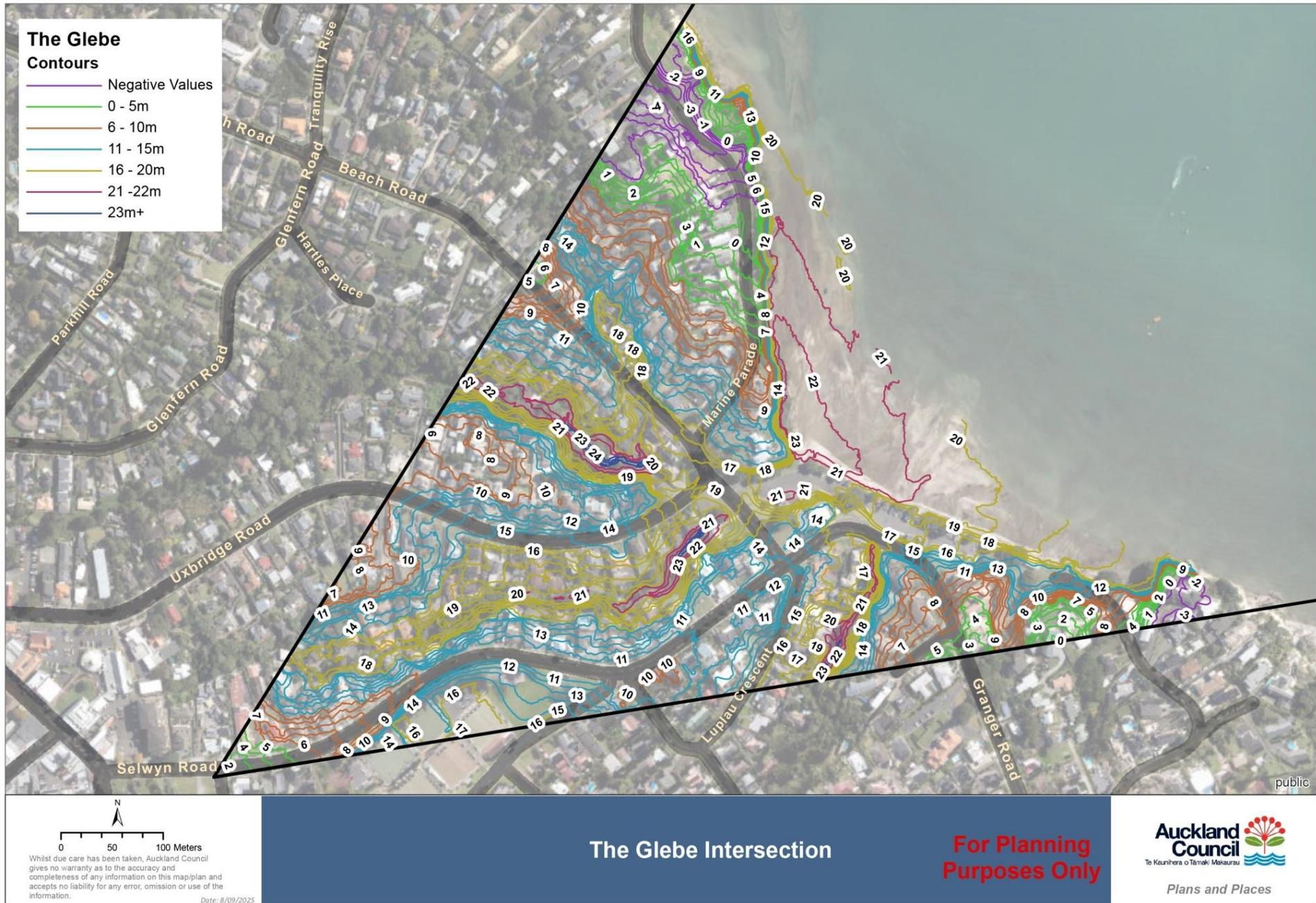


Figure 12 Contours between the floor of the viewshaft and the ground

areas close to the coast where the contours are less than the existing MHS and Single House zoning height limits of 8m. The introduction of the modified THAB zone with its 22m maximum building height, changes the relationship between the floor of the viewshaft and potential development considerably. As the viewshaft is not intended to prevent redevelopment of these areas, further work is required to determine whether the viewshaft should be angled less steeply or only extend a particular distance from the origin. Unfortunately, time constraints have meant that this work has yet to be undertaken.

Considering the qualities of the view in terms of the AUP D16 assessment criteria, I provide the following table.

A	<i>The extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape</i>	This viewpoint, close to the centre of Howick, provides an opportunity to understand the relationship between Howick and the inner Gulf and islands.
B	<i>the community association with, or public appreciation of, the values of the viewshaft</i>	Originally nominated by the community, but there are no apparent associations. The reasonably busy road does provide opportunity for appreciation of the view by many, including bus passengers. It is also appreciated by residents in the "Gulf View Rest Home" at number 20 Selwyn Road.
C	<i>the visual coherence, unity or integrity of the viewshaft and its view</i>	The view is interrupted to some extent by power lines but otherwise is coherent. The view actually increases briefly as one travels down Selwyn Road.
D	<i>the potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates</i>	Historic associations unknown, but they appear unlikely at this location.

Table 4 Selwyn Road / The Glebe viewshaft assessment against Policy D16.3.1

As well as my consideration of this viewshaft in relation to the D16 criteria and because of the relationship between this viewshaft and the Stockade Hill viewshaft, I have been asked to specifically consider it in terms of RPS Policy B4.3.2 including (5) (e) which states:

"the extent to which there are other similar public views"

The Stockade Hill viewshaft is less than 1km away from this viewpoint and provides a much wider panorama and an even better understanding of the relationship of Howick to the Hauraki Gulf and its islands. It extends from Rangitoto in the west right round to Beachlands in the east and takes in Rangitoto, Motukorea, (Browns Island) Motutapu, Motuihe, Waiheke and Motukaraka, as well as Musick Point. It could be considered a better alternative viewshaft.

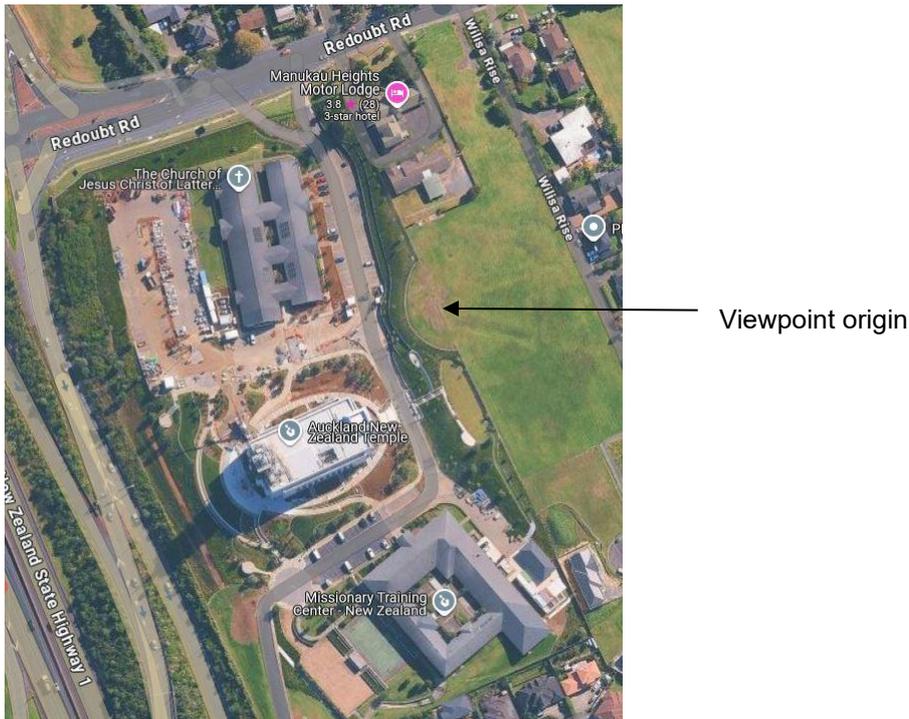
On the other hand, to appreciate that view one has to walk from the adjoining road, either up the steep eastern side of Stockade Hill, or the gentler western side. The Selwyn Road / The Glebe viewshaft is readily available to pedestrians, motorists, bus passengers and cyclists moving downhill from the origin. As one moves first east and then north from The Glebe intersection, the view extends across the corner of Nixon Park and then the sea can be seen along the road corridor. As the road curves back to the east the sea views are lost at about

Luplau Crescent. Many of the qualities found in the protected viewshaft would thus be protected naturally by the local topography and landuse.

If this viewshaft were to be retained, and without having undertaken more geospatial analysis, it would be necessary to extend the viewshaft to the sea. Further work could potentially however identify an alternative termination line to the viewshaft prior to the sea, or could identify an alternative angle of the viewshaft plane which increases the distance between the viewshaft floor and the ground level near the sea. This work has not been undertaken and so I have found it very difficult to come to a conclusion on whether this viewpoint should be identified as a QM in PC120 or not.

5.4 ST JOHN REDOUBT, MANUKAU

The controls pertaining to this LPVO are illustrated in Schedule 11 Map 11.5. This LVPO is located on the western edge of St Johns Redoubt Historic Reserve, off Redoubt Road in Manukau. The reserve adjoins the Church of Jesus Christ of the Latter-day Saints (CJCLS) property to the west. The remains of the historic redoubt span the boundary between the two properties and a semi-circle of lawn with perimeter fencing extends into the CJCLS property as shown in the aerial **Photograph 6** below. This enables the public move further west than the viewpoint origin.



Photograph 6 Aerial of the CJCLS property west of St Johns Redoubt Historic Reserve.



Figure 13 The St John's Redoubt LPVO in Schedule 11 (left) and the AUP Geomaps (right)

As shown in **Figure 13** above, the viewshaft of this LPV originates on the western edge of the St John's Redoubt Historic Reserve and spreads westwards. In the AUP Geomaps it appears

to terminate at the Southern Motorway. Similarly, in Schedule 11 of the AUP, the viewshaft appears to terminate at the southern motorway.

However, when the full extent of this viewshaft, as indicated in Schedule 11, is mapped, it extends all the way to the Manukau Harbour, as illustrated in **Figure 14**, below.

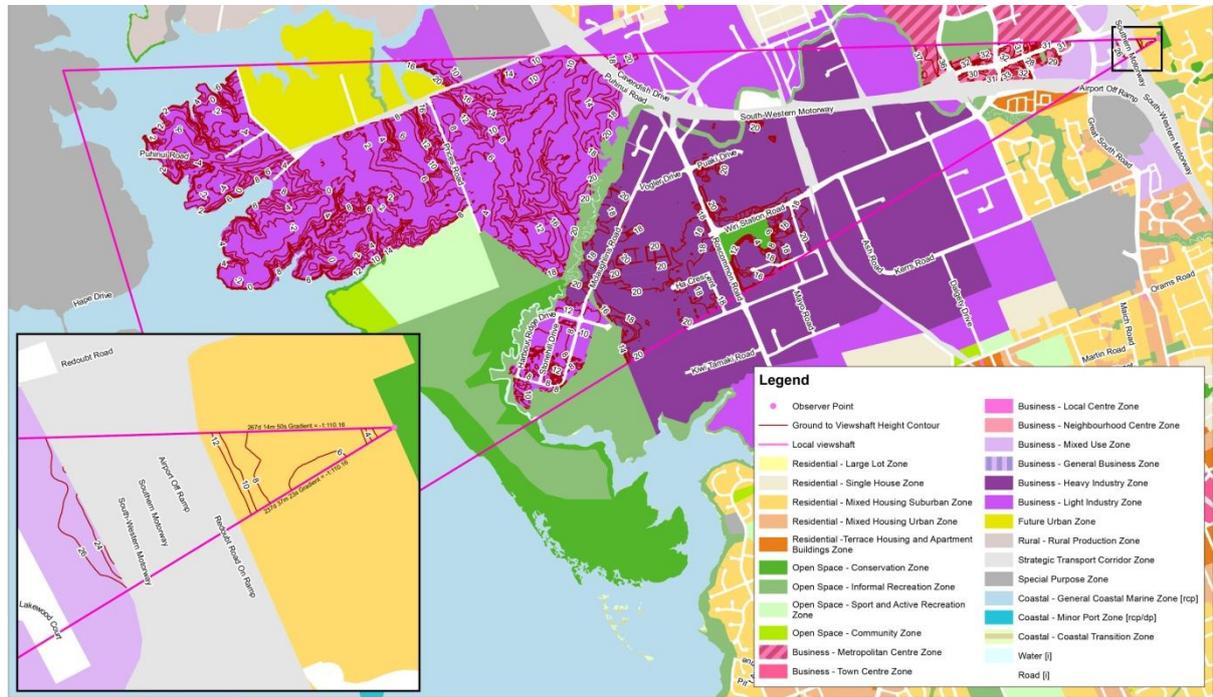


Figure 14 Full extent of viewshaft shown over operative AUP zoning map (contours to be ignored)

As can be seen in **Figure 14**, the viewshaft extends across a range of different zones including Business - Metropolitan Centre, (MC), Business - Mixed Use, (MU), THAB, and both Business - Light Industry (LI), and Heavy Industry, (HI). Close to the origin point it crosses MHS zoned land belonging to the CJCLS.

Before assessing the height difference between the viewshaft floor and the building height controls in the various zones, it is necessary to consider the impact of more recent developments on this viewshaft.

Overleaf are three photographs taken from the viewpoint origin looking towards the Manukau Harbour, Awhitu Peninsula, Manukau Heads, Cornwallis and Matukutūreia, McLaughlins Mountain, **Photographs 7, 8 and 9**. It is clear from these photographs that development has significantly interrupted the view, particularly the view to the Manukau Heads and Cornwallis. Firstly, the 16 storey Duval Apartment building was constructed between 2015 and 2022. Subsequently a 38m high warehouse was constructed at the rear of the Bluebirds Food property on Wiri Station Road. These buildings are identified in the photographs.

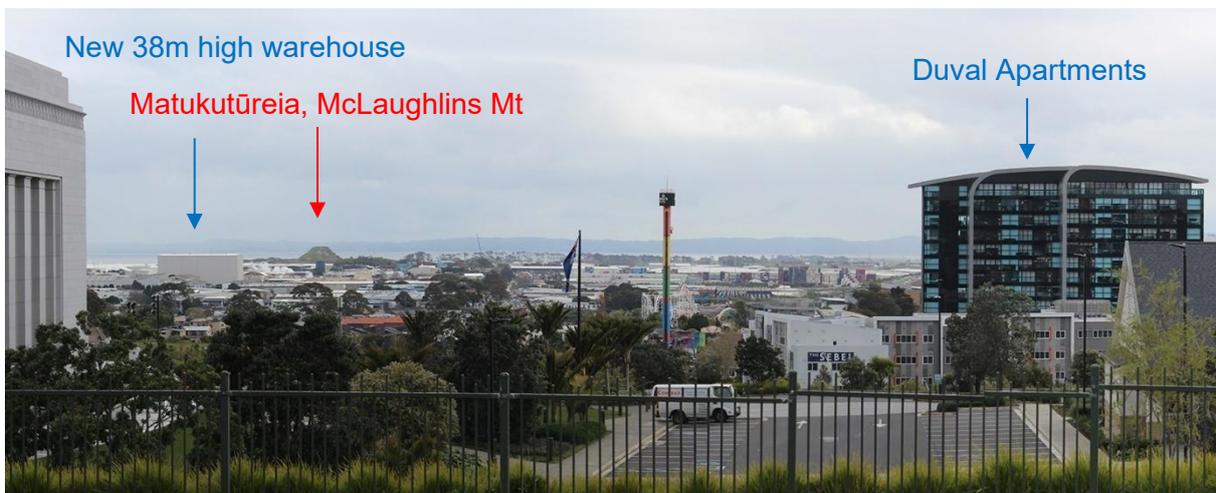
In my opinion there is little point in retaining the viewshaft at the width shown in **Figure 13**, as the view has already been curtailed by the Duval Apartment building. Additionally, as is clear in **Figure 14**, the viewshaft crosses areas of Metropolitan Centre zone at Manukau, where heights up to 72.5m can be anticipated. In my view, retention of the viewshaft, with a reduction in the width is worth considering.



Photograph 7 St Johns Redoubt Viewshaft as seen in 2015⁵



Photograph 8 St Johns Redoubt Viewshaft as seen in 2022⁶



Photograph 9 St Johns Redoubt Viewshaft as seen in 2025

⁵ At the time of the PAUP LPVO assessment

⁶ At the time of the PC78 LVPO assessment

To support this opinion I have assessed a reduced viewshaft against the Policy D16.3.1 criteria. It is shown in **Table 5** below:

A	<i>The extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape</i>	Viewpoint within a public reserve offers a long view to the Manukau Harbour and Awhitu Peninsula, with Matukutūreia formal a focal point. Despite recent developments the view enables public appreciation of the relationship between the redoubt and Manukau Harbour.
B	<i>the community association with, or public appreciation of, the values of the viewshaft</i>	Originally nominated by the local community, so presumably appreciated by them. Access to viewpoint currently limited by the reserves invisibility, but could be better promoted, particularly in light of its heritage significance.
C	<i>the visual coherence, unity or integrity of the viewshaft and its view</i>	The integrity of the original viewshaft has been severely compromised. Nevertheless, the narrowed viewshaft to the harbour and Awhitu remain coherent with Matukutūreia, McLaughlins Mountain as a focal point.
D	<i>the potential value of the viewshaft for public education, including known historic associations in relation to the site where the viewshaft originates</i>	There remains great potential for interpretation of both the heritage values of the site and the components of the view, which may include the relationship of the redoubt with the views to the east.

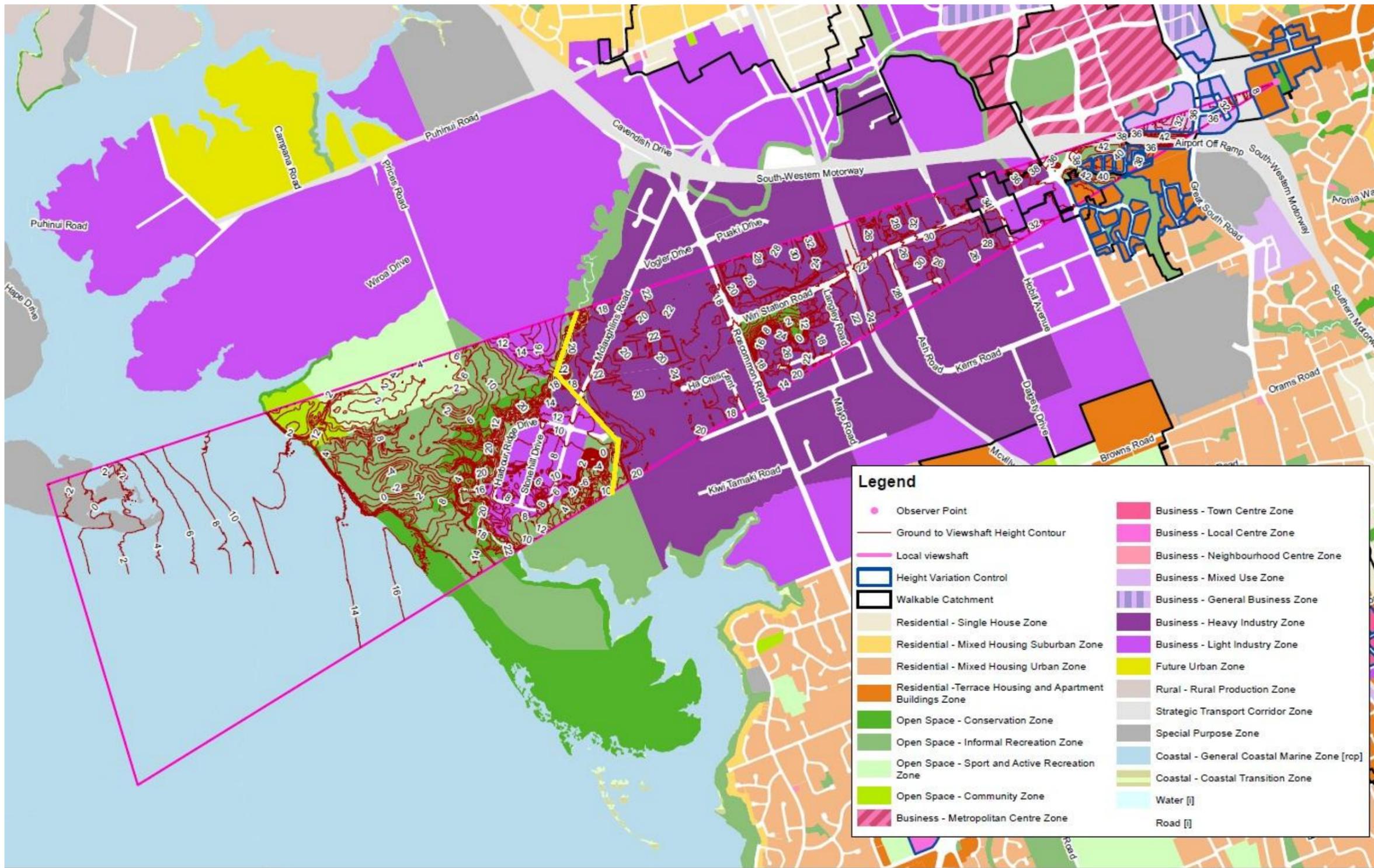
Table 5 St Johns Redoubt viewshaft assessment against Policy D16.3.1

In my opinion, these values support the identification of a narrowed viewshaft as a QM in PC120. In considering the extent of reduction in the viewshaft I have taken into account the level of development that is anticipated to be enabled by PC120, as well as development already enabled by the AUP.

Initially, I did consider moving the northern edge of the viewshaft to the southern edge of the Duval Apartment building. However, this would leave two blocks of MC zoned land, between Manukau Station Road and the South-western Motorway, within the viewshaft. An alternative would be to align the northern boundary of the viewshaft with the most southerly edge of the MC zone. By coincidence this alignment is right through the Fearfall Drop Tower at Rainbows End, which helps understand the extent of the possible viewshaft in the above photographs.

The construction of the over-height warehouse at Bluebird Foods about 2km from the viewpoint origin, has highlighted the potential for buildings exceeding the HI maximum building height of 20m to interrupt the view. If that building had been located a little further north and east, it would have completely blocked views to Matukutūreia from the viewpoint. On the other hand, the contours shown in **Figures 15** and **16**, overleaf, make it clear that for much of the LI and HI zoned land within the narrowed viewshaft, development up to the 20m could be readily be accommodated without breaking through the floor of the viewshaft. However, the viewshaft would need to remain in place, and be appropriately illustrated in GIS Geomaps, for this control to work.

There are some small areas where this would not be true. Building heights within the HI zoned block bounded by Wiri Station, Roscommon and Langley Roads includes contours of



**Local Public Views : St Johns Redoubt, Redoubt Road
Reduced Extent**



Whilst due care has been taken, Auckland Council gives no warranty as to the accuracy and completeness of any information on this map/plan and accepts no liability for any error, omission or use of the information.



Figure 15 Narrowed viewshaft at St Johns Redoubt, with recommended termination line marked in yellow.

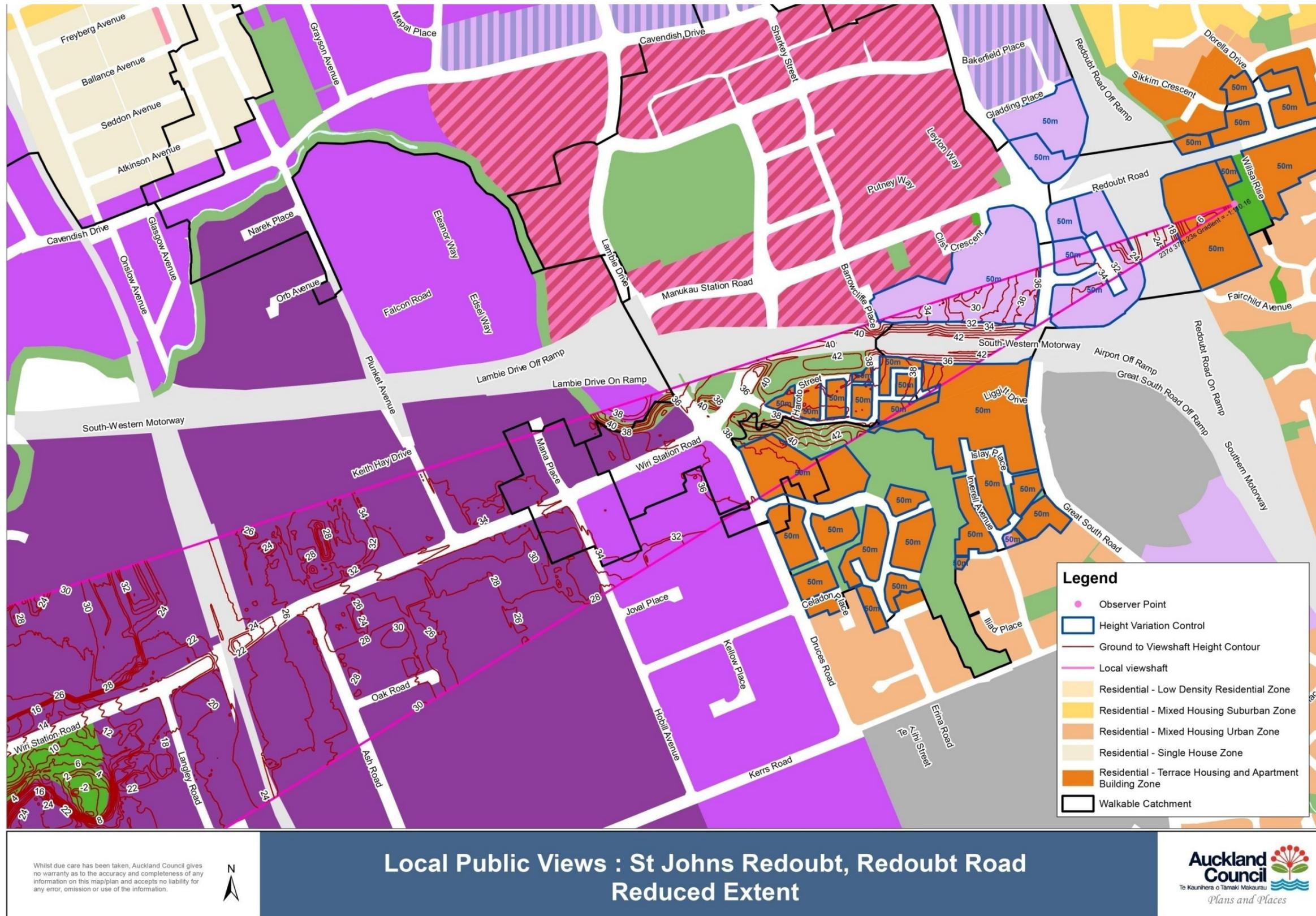


Figure 16 Narrowed viewshaft at St Johns Redoubt, eastern end.

between 4m and 18m in **Figure 15**. However, this block contains the remains of Wiri Mountain and the Wiri Lava Caves Scenic Reserve which explains the more elevated land which reduces contour heights. To the east of this block, over areas of operative LI and HI zoned land, the contours shown on **Figure 16** range between 20m, the maximum building height, in these zones, and 36m, meaning the viewshaft would not interrupt anticipated building heights.

Finally, there is an area further west around the LI area of Harbour Ridge Drive where the contours are again lower than the maximum 20m building height. Retaining the view to Matukutūreia is important, in my opinion. Were development to be undertaken on the seaward side of the mountain, it would form a backdrop and would, in my opinion, be acceptable. For this reason I propose delineating an end to the narrowed viewshaft, as shown in **Figure 15**, above, such that LI zoned land beyond (west of) the Puhinui Stream and Matukutūreia Stonefields Reserve is not covered by the viewshaft overlay. This means the overlay would stop just east of Matukutūreia. The distance between the viewpoint origin and these excluded areas of LI zoned land, about 5km, should mean that any taller development being constructed here will appear small within the viewshaft and not detract from its overall qualities.

RECOMMENDATION

In my opinion, the narrowed and foreshortened viewshaft shown in **Figure 15** is worthy of protection as a QM in PC120.

6 SUMMARY

AUCKLAND WAR MEMORIAL MUSEUM VIEWSHAFT OVERLAY

In light of the cultural, heritage and landscape significance of the AWMM viewshaft overlay, I recommend its retention, in terms of control on the height of development, and its recognition as a QM in PC120.

STOCKADE HILL VIEWSHAFT OVERLAY

In my opinion the Stockade Hill Viewshaft is worthy of identification as a QM under PC120, together with restrictions to the extent of the THAB zone and extension of the 8m height control areas.

LOCAL PUBLIC VIEWS OVERLAY

Pilkington Road Viewshaft, Panmure

In my opinion, the viewshaft provides the Panmure community with a locally significant view of an important landscape feature that will only be improved by the creation of the town square. To avoid visual interruption to this, the viewshaft should be identified as a QM in PC120, in my view.

I also note that both D16.10.1 and Schedule 11 Map 11.7 will need to be updated because at present they refer to the parapet of the building that is to be demolished and have out-dated cadastral information.

Queens Road Viewshaft, Panmure

I find that the viewshaft provides the Panmure community with a locally significant view of an important landscape feature. To avoid visual interruption to this, the viewshaft should be identified as a QM in PC120.

Selwyn Road / The Glebe Viewshaft, Howick

In considering the value of the view against the Policy D16.3.1 assessment criteria alone, I find the viewshaft is worthy of ongoing protection. However, if retained as a QM, further work would be necessary to identify if there is an alternative angle and length of viewshaft, that appropriately manages the view while not unduly constraining development. Additionally, when considered against RPS Policy B4.3.2 (5) (e), I find that the Stockade Hill Viewshaft provides a very similar but much larger view to the Hauraki Gulf and its islands.

St Johns Redoubt Viewshaft, Manukau

In my opinion, this viewshaft should be extended towards the sea, when compared with the Schedule 11 and GIS Geomaps versions. It should also be narrowed to exclude MC zoned land and end to the east of Matukutūreia, as illustrated in **Figures 15** and **16**, and would remain worthy of protection as a QM in PC120.



Melean Absolum
Dip LA FNZILA
14 September 2025

APPENDIX 2. List of Sites Impacted by SHVO qualifying matter (preferred option)

List of sites Impacted by SHVO (preferred option)		
Address	Operative AUP Zone	Section RMA
16 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
18 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
20 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
22 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
24 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
26 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
36 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
38 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
40 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
44 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
46 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
46A Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
48A Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
50 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
52 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
31 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
33 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
35 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
37 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
39 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
41 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
41A Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
43 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
47 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
49 Mellons Bay Road, Mellons Bay	Residential – Mixed Housing Urban	S771(j)
51 Mellons Bay Road, Mellons Bay	Residential – Single House	S771(j)
51A Mellons Bay Road, Mellons Bay	Residential – Single House	S771(j)
2 Picton St, Howick	Residential – Mixed Housing Urban	S771(j)
4 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
6 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
8 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)

1/10 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
12 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
14 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
14A Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
16 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
15 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
13 Walter Macdonald St, Howick	Residential – Mixed Housing Urban	S771(j)
32 Parkhill Rd, Howick	Residential – Mixed Housing Urban	S771(j)
32A Parkhill Rd, Howick	Residential – Mixed Housing Urban	S771(j)
34 Parkhill Rd, Howick	Residential – Single House	S771(j)
34A Parkhill Rd, Howick	Residential – Single House	S771(j)
36 Parkhill Rd, Howick	Residential – Single House	S771(j)
38 Parkhill Rd, Howick	Residential – Single House	S771(j)
40 Parkhill Rd, Howick	Residential – Single House	S771(j)
42 Parkhill Rd, Howick	Residential – Single House	S771(j)
44 Parkhill Rd, Howick	Residential – Single House	S771(j)
44A Parkhill Rd, Howick	Residential – Single House	S771(j)
46 Parkhill Rd, Howick	Residential – Single House	S771(j)
48 Parkhill Rd, Howick	Residential – Single House	S771(j)
50 Parkhill Rd, Howick	Residential – Single House	S771(j)
52 Parkhill Rd, Howick	Residential – Single House	S771(j)
52A Parkhill Rd, Howick	Residential – Single House	S771(j)
54 Parkhill Rd, Howick	Residential – Single House	S771(j)
56 Parkhill Rd, Howick	Residential – Single House	S771(j)
58 Parkhill Rd, Howick	Residential – Single House	S771(j)
60 Parkhill Rd, Howick	Residential – Single House	S771(j)
62 Parkhill Rd, Howick	Residential – Single House	S771(j)