



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

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## to the Auckland Unitary Plan (Operative in part)

**Section 32 and Schedule 3C of the RMA qualifying matter:**

**Auckland War Memorial Museum Viewshaft**

**EVALUATION REPORT**

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## Executive Summary

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 Auckland War Memorial Museum (**AWMM**) Viewshaft as a qualifying matter incompatible with the level of development required by clause 4(1)(b) or (c) of Schedule 3C of the RMA and the implementation of policy 3 of the National Policy Statement on Urban Development (**NPS-UD**). The scale and significance of the issues are assessed as being medium.

The operative AWMM Viewshaft is managed through the mapped overlay and the provisions of Chapter D19 Auckland War Memorial Museum Viewshaft Overlay of the AUP. The viewshaft manages and protects regionally significant views in two directions, both to and from the AWMM.

The following evaluation and findings have been informed by the requirements of the RMA, as well as 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 AWMM Viewshaft. As such, the AWMM Viewshaft is identified as a qualifying matter in accordance with Schedule 3C cl.8(1)(a) of the RMA, as a matter of national importance that decision makers are required to recognise and provide for under s6(f) of the RMA.

It is proposed to retain the existing method and provisions in Chapter D19 of the Auckland Unitary Plan (Operative in Part) (**AUP**) as a qualifying matter to restrict heights otherwise enabled as directed by policy 3 in areas beneath the AWMM Viewshaft. A resource consent for a non-complying activity is required where buildings would exceed specified height limits. The AWMM Viewshaft would primarily impact residential and business land within Parnell, however also extends into and over the Business – City Centre Zone.

The proposed application of the AWMM Viewshaft qualifying matter has a reasonably substantial impact on the provision of development capacity across Parnell and within the walkable catchment of the City Centre Zone. However, the impact on development capacity cannot be wholly attributed to the AWMM Viewshaft, with a number of other qualifying matters (including regionally significant Maunga Viewshafts) extending over the area.

The reduction in development capacity and potential on identified sites is considered to be appropriate, and retaining the operative method is considered to be the most effective and efficient means of ensuring that the values of the AWMM Viewshaft continue to be managed.

## 1. Introduction

1. This report is prepared as part of the evaluation required by Section 32 and Schedule 3C of the RMA for PC120 to the 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 AWMM Viewshaft as a qualifying matter to the requirements of clause 4(1)(b) or (c) of Schedule 3C of the RMA and the implementation of policy 3 of the NPS-UD. This report also evaluates the provisions which have been included in PC120 relating to the AWMM Viewshaft.
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 77I(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 existing qualifying matters

8. For the purposes of PC120, evaluation of the AWMM Viewshaft 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 to identify any relevant provisions that apply to this qualifying matter
  - development of draft amendments to the operative district plan provisions of the AUP to implement this matter as a Qualifying Matter in accordance with the requirements of Schedule 3C of the RMA
  - review of the AUP to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter
  - review of the AUP Maps to assess the spatial application of this qualifying matter

- section 32 options analysis for this qualifying matter and related amendments
- review of decisions on the Business – City Centre Zone through Plan Change 78, as they pertain to the AWMM Viewshaft.

10. The scale and significance of the issues is assessed to be medium.
11. This section 32/Schedule 3C evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received.

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

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

<p><b>Evaluate option(s) - environmental, social, economic, cultural benefits and costs</b></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><b>Overall judgement as to the better option (taking into account risks of acting or not acting)</b></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 AWMM Viewshaft qualifying matter which seeks to manage and protect views both to and from the Auckland War Memorial Museum. The purpose of the viewshaft is best described in D19.1 Background as follows:

*'Auckland War Memorial Museum is located in a prominent location within Auckland Domain.*

*The museum is a landmark building with historic, community and architectural significance and is one of Auckland's most popular vantage points. Sited on relatively low grounds in relation to the surrounding ridges, the view to and from the museum could be easily compromised or lost through the erection of tall buildings. The combination of landform, dominant building presence and setting contribute to the museum's unique visual quality. Special visual protection measures are applied to secure the highly appreciated views and aspect qualities associated with this historic heritage place. The overlay rules limit building height and include provision for parapets, chimneys communications antennae, support structures, housing, building services components and advertising signs.'*

13. As is set out in the Landscape Assessment prepared by Ms Absolum and included as **Appendix 1**, the AWMM viewshaft has been identified as being regionally significant in accordance with the criteria contained within Chapter B4 of the AUP. The AWMM Viewshaft was initially introduced and scheduled through the legacy Auckland Isthmus and Central Area district plans and was subsequently re-confirmed through the Proposed Auckland Unitary Plan process.
14. The provisions of Chapter D19 are to be read in conjunction with the mapped AUP overlay and Figures D19.6.1.1, D19.6.1.2, and D19.6.1.3, which establish height limit surfaces forming a three-dimensional viewshaft plane. The 'origin' point is taken from the front steps leading up to main entrance to the Museum; however, the AWMM Viewshaft is unique in that it seeks to protect views in two directions, to and from the AWMM and the Auckland Harbour.

15. The viewshaft extends over residential and business zoned land specified for intensification by policy 3 of the NPS-UD, thereby requiring assessment through PC120 to determine whether it requires identification as a qualifying matter. Notably, the viewshaft extends over portions of the City Centre Zone (policy 3(A)) and over walkable catchments from the Parnell Train Station and the edge of the City Centre Zone (policy 3(C)).
16. The viewshaft predominantly affects Parnell and a limited portion of the City Centre Zone. Given its strategic location, Parnell has otherwise been identified through PC120 for greater intensification and building heights of up to 50m (or 15 storeys). These additional heights are proposed to be enabled through application of a Height Variation Control, which provides for additional building height through the underlying zone provisions.
17. The location of the AWMM viewshaft coincides with a number of other scheduled viewshafts identified through PC120 as qualifying matters. These viewshafts, including several regionally significant Maunga viewshafts as noted below, manage building heights through application of a viewshaft plane applied through a mapped overlay:
  - E8, Mount Eden;
  - H6, Mount Hobson; and
  - T1, Rangitoto Island.
18. Areas beneath the AWMM viewshaft are also affected by other qualifying matters, such as the Special Character Area Overlay and the Coastal Environment qualifying matter.
19. In the case of the AWMM Viewshaft, Chapter D19 primarily manages protected values through the imposition of height limits on development beneath the viewshaft. In particular, buildings and other structures which exceed the height limits specified in Figures D19.6.1.1 through D19.6.1.3 require resource consent as a non-complying activity.
20. The non-complying activity status enables the Council full discretion over potential effects that may arise from the non-compliance. Special Information Requirements introduced to Chapter D19 through Plan Change 78 decisions on the City Centre Zone also require expert landscape assessment of potential effects on views between Takarunga / Mount Victoria and Maungawhau / Mount Eden for activities requiring non-complying activity consent. These views are not currently scheduled within Schedule 9 Maunga Viewshafts Schedule of the AUP.
21. The Landscape Assessment included in **Appendix 1** sets out findings of assessment confirming the values the AWMM Viewshaft against the criteria set out in Chapter B4 of the AUP. This also set outs the extent to which additional development, as enabled by Policy 3, would affect the values identified and managed by the AWMM Viewshaft.

22. For the reasons set out in the Landscape Assessment, the protection of significant views through the AWMM Viewshaft is considered to be incompatible with the level of development provided for by policy 3 of the NPS-UD. In particular, developments beneath the viewshaft generally would not be able to both achieve the 15 storey (50m) building heights enabled by the Height Variation Control and also comply with the specified height limits in Chapter D19. In some areas, given the rolling topography, the viewshaft plane is located 5-10m above ground level.
23. Chapter D19 height limit surfaces do not constrain building height evenly across the extent of the viewshaft. Notably, the AWMM Viewshaft has the most substantial constraining effect on development and building heights along and adjacent to ridges coinciding with Parnell Road, Gladstone Road, and St Stephens Avenue, whilst that effect lessens substantially in the valleys between ridgelines.

#### 4. Objectives and Policies (existing)

24. The relevant AUP objectives and policies, that support the AWMM Viewshaft qualifying matter are as shown below in the table:

**Table 2 Relevant Objectives and Policies**

AUP Chapter	Objective / Policy	Summary of matter addressed
<p><b>RPS Chapter B4 Natural Heritage</b></p>	<p><b>Objective B4.3.1.(2)</b> <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><b>Policy B4.3.2.(5)</b> <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"> <li>(a) <i>The viewpoint conveys the view to an audience from a public viewpoint that is regionally or locally significant;</i></li> <li>(b) <i>The view conveys an intact view within a wider context which is of high or good quality;</i></li> <li>(c) <i>The view will contribute to or reinforce an overall appreciation of the region's natural landscape;</i></li> <li>(d) <i>The view recognises the importance of the</i></li> </ul>	<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>

AUP Chapter	Objective / Policy	Summary of matter addressed
	<p><i>landscape to Mana Whenua;</i></p> <p>(e) <i>The extent to which there are other similar public views; and</i></p> <p>(f) <i>Taking into account the extent to which the viewshaft will affect future development otherwise enabled by this Plan.</i></p>	
<p><b>Chapter D19 Auckland War Memorial Museum Viewshaft Overlay</b></p>	<p><b>Objective D19.2.(1)</b> <i>Significant views to and from the Auckland War Memorial Museum are protected.</i></p> <p><b>Policy D19.3.(1)</b> <i>Prevent the visual intrusion of buildings and structures into current identified views to and from the museum.</i></p>	<p>Chapter D19 contains only a single objective and a single policy, which together seek to protect the significant views to and from the AWMM.</p> <p>Of note is that Policy D19.3.(1) is a 'prevent' policy which is accompanied by a non-complying activity for any intrusion into the D19 viewshaft plane, or exceeding the identified height limits.</p>

25. The AUP Regional Policy Statement (**RPS**) sets out the wider 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. Policy B4.3.2.(5) in particular sets out criteria for the evaluation and identification of locally and regionally significant views. These criteria as they pertain to the AWMM Viewshaft have been considered in the Landscape Assessment in **Appendix 1**.
27. Objectives and policies within Chapter D19 further reinforce relevant RPS direction by requiring the protection of significant views to and from the AWMM, and the prevention of visual intrusions from buildings and structures. A 'prevent' policy is a particularly strong directive, and should be treated much the same as 'avoid.'
28. In addition, it needs to be recognised that protected views originating from the AWMM are of the Auckland Harbour and Hauraki Gulf. 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 the AWMM Viewshaft overlay contributes 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:*

29. The Landscape Assessment included in **Appendix 1** has considered the policy direction discussed above in carrying out assessment and in making recommendations. The AWMM Viewshaft is considered to be incompatible with the level of development provided by policy 3 of the NPS-UD, noting that the building heights provided for would enable intrusions into the viewshaft. This would be inconsistent with the protection of views to and from the AWMM sought through Objective D19.2.(1).
30. As has been discussed above, the primary means of protecting the AWMM Viewshaft is through application of height restrictions as imposed through the three-dimensional viewshaft plane. The extent of the AWMM viewshaft overlay is mapped in the AUP, with Figures D19.6.1.1, D19.6.1.2, and D19.6.1.3 setting out the location and elevations of the viewshaft plane.
31. Chapter D19 contains two rules managing potential intrusions into the viewshaft. Rule D19.4.1.(A2) in particular requires resource consent as a non-complying activity where buildings and other structures exceed the heights specified in Figures D19.6.1.1, D19.6.1.2, and D19.6.1.3. There are no associated assessment criteria where resource consent is required under Chapter D19; the non-complying activity status enables the Council full discretion over potential effects on the viewshaft that may arise from the non-compliance.
32. The non-complying activity status associated with height exceedances is to be read in conjunction with Policy D19.3.(1) which seeks to 'prevent... visual intrusion.' This suggests there may be instances where exceedance beyond the specified height limits may not visually intrude into the views from viewing points, and this can be appropriately assessed through the resource consent application process.
33. As below, a single standard within Chapter D19 provides for a degree of increased building coverage on some sites where the view protection height limit surface is lower than the height limit in the zone. In practice, it is understood that this would only materially affect land zoned Residential – Single House.

*D19.6.1. Building coverage:*

- (1) *For sites where the view protection height limit surface is lower than the height limit in the zone, the maximum building coverage is 40 per cent, unless a greater building coverage is allowed in the zone.*

34. In addition, a Special Information Requirement was introduced through Plan Change 78 decisions on the City Centre Zone. This requires all applications pursuant to Rule D19.4.1.(A2) to be accompanied by an expert landscape assessment which assesses the effects of the height exceedance on views between Takarunga / Mount Victoria and Maungawhau / Mount Eden.

## 5. Development of Options

35. 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 PC120 is to 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.

36. A number of reasonably practicable options have been considered with respect to the management of the AWMM Viewshaft relative to the need to provide for intensification as directed by the NPS-UD. The three options that have been evaluated in the section 32 and Schedule 3C assessment of the AWMM Viewshaft qualifying matter are:

- **Option 1:** Implement policy 3 and apply the AWMM Viewshaft as a qualifying matter.  
*This option would implement policy 3 of the NPS-UD as directed, and the AWMM Viewshaft would be retained in full as a qualifying matter.*
- **Option 2:** Implement policy 3 and apply the AWMM Viewshaft as a qualifying matter, narrowing the spatial extent of the viewshaft.  
*This option would implement policy 3 of the NPS-UD as directed, and the AWMM Viewshaft would be retained as a qualifying matter and narrowed to exclude its southeastern-most extent which is not otherwise impacted by Maunga Viewshaft qualifying matters.*
- **Option 3:** Implement policy 3 and do not apply the AWMM Viewshaft as a qualifying matter.  
*This option would implement policy 3 of the NPS-UD as directed in full, and the AWMM Viewshaft would be removed where coinciding with policy 3 areas.*

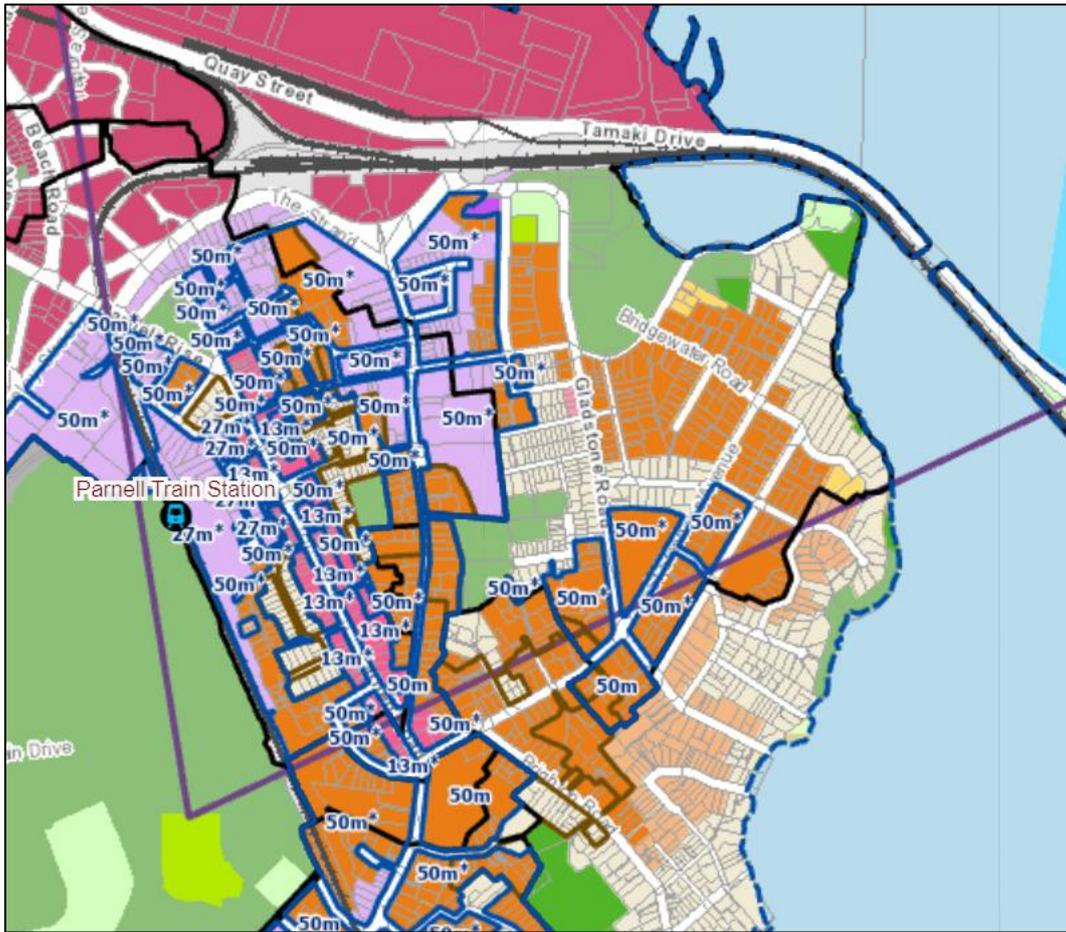
37. Further to the above options, the application of proposed Height Variation Controls as a method of policy 3 of the NPS-UD requires specific assessment and evaluation relative to identification of the AWMM Viewshaft as a qualifying matter.

38. In particular, the application of Height Variation Controls where the viewshaft plane restricts building heights has the potential to result in plan interpretation and implementation issues. A range of options have therefore been considered from an efficiency and effectiveness perspective, including possible removal of proposed Height Variation Controls in whole or in part, or through the use of annotations to the Height Variation Controls to alert plan users that a viewshaft qualifying matter may apply which affects enabled building heights.

### **Consequences for development capacity**

39. The consequences for the provision of development capacity by accommodating the AWMM Viewshaft qualifying matter are generally limited to restrictions on building heights. However, in the case of resource consent applications for non-complying activities, the overall bulk, form, and location of buildings exceeding specified height limits will be relevant to the assessment of any potential visual intrusions into the viewshaft.

40. The AWMM Viewshaft predominantly affects Parnell and a limited portion of the City Centre Zone. Given its strategic location, Parnell has otherwise been identified through PC120 for greater intensification and building heights of up to 50m (or 15 storeys). These additional heights are proposed to be enabled through application of a Height Variation Control, which provides for additional building height through the underlying zone provisions. **Figure 1** below depicts the proposed application of zones and Height Variation Controls applying beneath the AWMM Viewshaft.



*Figure 1. Proposed PC120 Zones and HVCs*

41. Effects on development capacity across sites beneath the AWMM Viewshaft vary widely; the constraining effect on development is therefore not ‘created equal.’ The AWMM Viewshaft has the most substantial constraining effect on development and building heights along and adjacent to ridges coinciding with Parnell Road, Gladstone Road, and St Stephens Avenue, whilst that effect lessens substantially in the valleys between ridgelines. **Figure 2** below depicts the elevation of the viewshaft plane about existing ground level.



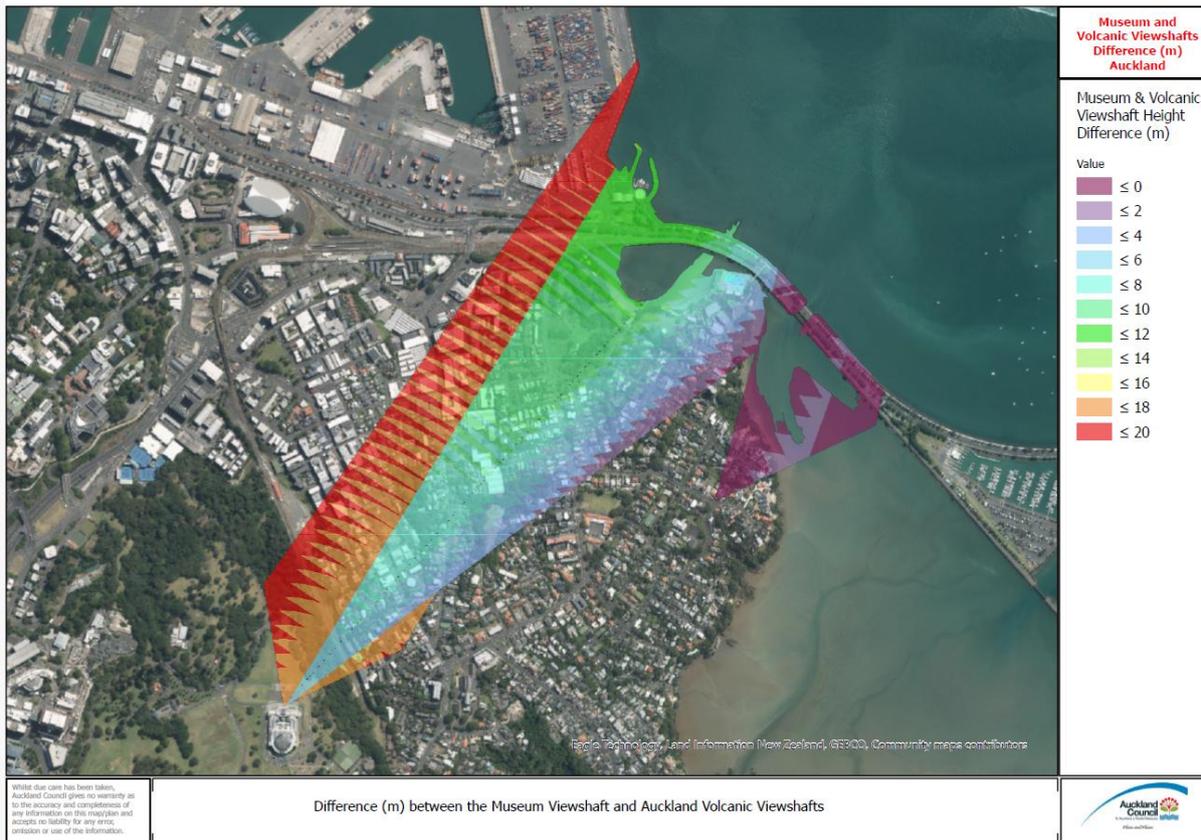
Figure 2. AWMM Viewshaft Plane Contours

42. **Table 3** includes a summary of sites as at 8 August 2025 beneath the AWMM which may be affected by the reduction of development capacity required to manage AWMM Viewshaft values relative to the uninhibited application of policy 3 of the NPS-UD, based on the operative mapped extent of the AWMM Viewshaft.

**Table 3 Summary of Effects on Development Capacity**

Proposed Zone/HVC	Number of sites	Land area of affected sites (hectares)
Business – Mixed Use	149	19.26
Business – Town Centre	90	5.3
Business – Neighbourhood Centre	4	0.16
Business – Light Industry	1	0.21
Residential – Single House	262	14.1
Residential – Mixed Housing Suburban	7	0.81
Residential – Mixed Housing Urban	8	1.31
Residential – Terrace Housing and Apartment Buildings	390	34.17
Open Space	22	10.51
50m Height Variation Control	360	37.42

43. The AWMM Viewshaft also extends over a number of sites located within the Business – City Centre Zone, however these have not been included in the above table as this matter, as it relates to the City Centre Zone, was heard in Plan Change 78.
44. Retention of the AWMM Viewshaft in full as a qualifying matter would affect a total of 955 sites zoned for residential or business uses. This includes a total of 360 sites to which a 50m Height Variation Control is proposed to apply through PC120. Application of the qualifying matter would mean the heights enabled by Height Variation Control in many cases would not be realisable, with constraints imposed through Chapter D19 which would limit heights based on the distance between the viewshaft plane and ground contours. In some instances, this would restrict heights to between 5-10m above existing ground level.
45. Given the above, retention of the AWMM Viewshaft would have a notable effect on development capacity within Parnell and within a walkable catchment of the City Centre Zone and rapid transit relative to the uninhibited application of policy 3 of the NPS-UD. The effect on development capacity lessens at a regional scale however remains noteworthy, particularly given the area’s strategic location relative to transport, amenities, and services.
46. It is however important to note that the reduction in plan enabled and realisable development capacity within the immediate area would not be wholly attributed to the AWMM Viewshaft. In particular, there are three regionally significant Maunga Viewshafts which overlap with the location and extent of the AWMM Viewshaft and which have been identified through PC120 as qualifying matters. Of the sites beneath the AWMM Viewshaft, 63% or a total of 602 sites are also located beneath a regionally significant Maunga Viewshaft.
47. A number of sites are also impacted by other qualifying matters, such as the Special Character Area overlay and the Coastal Environment qualifying matter.
48. On those sites that are located beneath both the AWMM Viewshaft and a regionally significant Maunga Viewshaft, the reduction in development capacity attributed only to the AWMM Viewshaft can be quantified by measuring the difference in the elevation of the AWMM viewshaft plane relative to that of the lowest Maunga Viewshaft plane. Above the lowest Maunga Viewshaft plane, reductions in development capacity must be attributed both to the AWMM Viewshaft and to the Maunga Viewshaft. These are best visualised in **Figure 3** below.
49. As is depicted in **Figure 3** below, the difference in elevation between the AWMM Viewshaft plane and the lowest regionally significant Maunga Viewshafts is estimated as follows:
  - between 18 and 20m below the viewshaft plane for E8, Mt Eden
  - up to 2m below the viewshaft plane for H6, Mt. Hobson
  - in the range of 2 and 12m below the viewshaft plane for T1, Rangitoto Island.



**Figure 3.** Difference in height (m) between AWMM Viewshaft plane and the lowest Maunga Viewshaft plane

50. In this regard, and in assessing the effects of the AWMM Viewshaft on development capacity, it is important not to consider the AWMM Viewshaft in isolation of other identified qualifying matters and their effects on development capacity.
51. The effects on plan enabled and realisable development capacity will vary by option. This is discussed in more detail in the evaluation of options below.

### Evaluation of options

52. To determine the most appropriate response for AWMM Viewshaft 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.
53. The scale and significance of the issues are assessed as being medium, which forms the envelope within which costs and benefits are to be evaluated and considered.

**Table 4 Evaluation of options**

Qualifying matter	Option 1	Option 2	Option 3
<b>Costs</b>			
<b>Costs of applying QM – housing supply / capacity</b>	<p><b>Moderate-high cost</b></p> <p>Costs to development capacity associated with the retention of the AWMM Viewshaft would be high relative to the uninhibited application of policy 3 of the NPS-UD, including Height Variation Controls of up to 50m in this location.</p> <p>The cost however cannot be fully attributed to the AWMM Viewshaft, with a number of Maunga Viewshafts already reducing enabled building heights below what the Height Variation Controls would otherwise provide for.</p>	<p><b>Moderate cost</b></p> <p>Costs to development capacity associated with the retention of the AWMM Viewshaft would be moderate-high relative to the uninhibited application of policy 3 of the NPS-UD (albeit lower than Option 1), including Height Variation Controls of up to 50m in this location.</p> <p>The cost however cannot be fully attributed to the AWMM Viewshaft, with a number of Maunga Viewshafts already reducing enabled building heights below what the Height Variation Controls would otherwise provide for.</p>	<p><b>No cost</b></p> <p>Note that whilst there would be no direct cost to development capacity associated with this option, it cannot be assumed that policy 3 could be applied to this area uninhibited. In particular, Maunga Viewshafts will reduce enabled building heights in many locations well below what the Height Variation Controls would otherwise provide for regardless of the AWMM Viewshaft.</p>
<b>Costs: Social</b>	<p><b>Low-moderate cost</b></p> <p>There are social costs to limiting the number of individuals able to live and work in close proximity to transport, amenities, and services.</p>	<p><b>Moderate-high cost</b></p> <p>There are social costs to limiting the number of individuals able to live and work in close proximity to transport, amenities, and services.</p> <p>This option would also result in some loss of the expansive views to and from the AWMM, which has social costs.</p>	<p><b>High cost</b></p> <p>This option would result in substantial social costs at a local, regional, and national level associated with the loss of views both to and from the Auckland War Memorial Museum. The expansive views from the Museum are currently a significant draw for Auckland residents and visitors alike, whilst the views to the AWMM from ships entering the Auckland Harbour is a distinctive point of local identity.</p>
<b>Costs: Economic (not otherwise covered by housing capacity issues)</b>	<p><b>Moderate-high cost</b></p> <p>There would be substantial cost to applicants involved in developments beneath the viewshaft, where these approach or extend into the viewshaft. For applications extending into the viewshaft, there is a high risk of notification and of consent being declined.</p> <p>In addition, there are economic costs to Council and plan users in interpreting and implementing the provisions.</p>	<p><b>Moderate-high cost</b></p> <p>There would be substantial cost to applicants involved in developments beneath the viewshaft, where these approach or extend into the viewshaft. For applications extending into the viewshaft, there is a high risk of notification and of consent being declined.</p> <p>In addition, there are economic costs to Council and plan users in interpreting and implementing the provisions.</p> <p>Parnell is a highly accessible location in Auckland, being located within a walkable</p>	<p><b>Low-moderate cost</b></p> <p>No administrative and/or resource consenting costs associated with implementing provisions in these areas.</p> <p>However, there will be costs to economic activity associated with reduction in visitors to the AWMM to appreciate the views.</p>

Qualifying matter	Option 1	Option 2	Option 3
	Parnell is a highly accessible locations in Auckland, being located within a walkable catchment of both rapid transit and the City Centre Zone. As such, there is a high economic cost to displacing and dispersing growth further from transport, amenities, and services.	catchment of both rapid transit and the City Centre Zone. As such, there is a high economic cost (albeit slightly less than Option 1) to displacing and dispersing growth further from transport, amenities, and services.	
<b>Costs: Environmental</b>	<b>Moderate-high cost</b> Likely to result in greater emissions as a result of business/residential activities having to locate further from transport, services, and amenities.	<b>Moderate-high cost</b> Likely to result in greater emissions (albeit less than Option 1) as a result of business/residential activities having to locate further from transport, services, and amenities.  Would result in some loss of the connection between the AWMM and the local landscape and Auckland Harbour.	<b>Moderate-high cost</b> Would result in loss of the connection between the AWMM and the local landscape, particularly appreciation of the coastal environment and views to the Auckland Harbour and the Hauraki Gulf.
<b>Benefits</b>			
<b>Benefits of applying the QM - social</b>	<b>High benefit</b> This option would result in substantial social benefits at a local, regional, and national level associated with continued protection of views both to and from the Auckland War Memorial Museum. The expansive views from the Museum are currently a significant draw for Auckland residents and visitors alike, whilst the views to the AWMM from ships entering the Auckland Harbour is a distinctive point of local identity.	<b>Moderate-high benefit</b> This option would result in substantial social benefits at a local, regional, and national level associated with continued protection of views both to and from the Auckland War Memorial Museum, albeit somewhat less than Option 1.  There is considered to be social benefit to enabling more development close to transport, amenities and services relative to Option 1.	<b>Low-moderate benefit</b> There is considered to be some social benefit to enabling more development close to transport, amenities and services; however this benefit would not be inherently different from what would otherwise arise from Option 2.
<b>Benefits - economic</b>	<b>Low-moderate benefit</b> There are some benefits to economic activity expected associated with tourists visiting the viewing point.	<b>Low-moderate benefit</b> There are some benefits to economic activity expected associated with tourists visiting the viewing point. This would be tempered somewhat by the fact that the expansive views are reduced relative to Option 1.  This option would enable more people to live and work closer to transport options, amenities, and services; however this is not considered to be result in	<b>Moderate-high benefit</b> Administrative costs will decrease, as development will not need to consider potential effects of intrusion into the viewshaft – potentially reducing the number and complexity of resource consents required.  Enabling people to live and work closer to transport options, amenities, and services is expected to have

Qualifying matter	Option 1	Option 2	Option 3
		substantially greater economic benefit relative to Option 1.	some economic benefit to businesses.
<b>Benefits – environmental</b>	<p><b>Moderate-high benefit</b></p> <p>Would protect the connection between the AWMM and the local landscape, particularly appreciation of the coastal environment and views to the Auckland Harbour and the Hauraki Gulf.</p>	<p><b>Moderate-high benefit</b></p> <p>Would protect (albeit not in full) the connection between the AWMM and the local landscape, particularly appreciation of the coastal environment and views to the Auckland Harbour and the Hauraki Gulf.</p> <p>This option is expected to result in some environmental benefit relative to Option 1 in that it would enable more people to live and work closer to transport options, amenities, and services.</p>	<p><b>High benefit</b></p> <p>Enabling people to live and work closer to transport options, amenities, and services will support reduction in greenhouse gas emissions;</p>

## Analysis

54. It is considered that Option 1 is the most appropriate method for achieving both the purpose of PC120 and the direction afforded by Chapters B4 and D19 of the AUP. In particular, the AWMM Viewshaft is an important element of regional and national identity and its removal would result in substantial social and environmental costs. It is acknowledged that retention of the AWMM Viewshaft in its current mapped form has a reasonably high impact on development capacity, however greater heights will be able to be achieved outside of the ridgelines where the viewshaft plane has the most constraining effect on development.
55. Option 2 would enable some further development capacity in the immediate area relative to Option 1, however this is considered to be outweighed by the social and environmental costs associated with the loss of some of the significant views previously identified for protection. In particular, and as noted in the Landscape Assessment in **Appendix 1**, this would have the greatest effect on views to the AWMM from incoming ships entering the Auckland Harbour, which is an important element of regional and national identity.
56. Option 3 would enable the greatest development capacity relative to the other two options however the benefits associated with the removal of the AWMM Viewshaft are substantially lessened by the fact that there are a number of other qualifying matters which have a constraining effect on development in the immediate area. Even if the AWMM Viewshaft were not identified as a qualifying matter, development capacity within the policy 3(C) area would still be constrained (albeit to a lesser degree). As has

been mentioned above, its removal would result in substantial social and environmental costs.

### **Risks or acting or not acting**

57. 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. In this instance, the AWMM Viewshaft and its methods are well understood, and the evaluation undertaken has been informed by assessment carried out by an expert landscape architect.
58. The risk of not acting, which allows for the development to build through the AWMM Viewshaft plane is likely to have a significant cost on social and environmental outcomes. As this is an important regional control, it contributes to a well-functioning urban environment that provides for social well-being and achieves environmental outcomes.
59. The risk of acting, which means retaining the AWMM as a qualifying matter, provides for better environmental outcomes whilst still ensuring the AUP is consistent with both Objectives 1 and 2 of the NPS-UD.

### **Effectiveness and efficiency**

60. The objective of the plan change is to implement clause 4(1)(b) or (c) of Schedule 3C of the RMA and policy 3 of the NPS-UD. The primary objective of the AWMM Viewshaft is to provide for the protection of views to and from the AWMM.
61. Based on the above evaluation, it is considered that Option 1 is the most efficient and effective means of the three options of achieving both the objectives of the plan change and providing for the protection of views to and from the AWMM. Option 1 is considered to be slightly more efficient and effective than Option 2.
62. Option 3 may be efficient and effective at achieving certain objectives of PC120, however is not considered to be efficient and effective at balancing this with the protection of views to and from the AWMM.
63. In addition to the above, consideration has been given to the potential disconnect between the heights enabled through application of Height Variation Controls and the height limits imposed through Chapter D19, including the flow on effects this may have on plan usability, interpretation, and implementation. Options considered in this regard included possible removal of proposed Height Variation Controls in whole or in part where applying to land beneath the AWMM Viewshaft, and/or the use of annotations on Height Variation Controls to alert plan users that a viewshaft qualifying matter may apply which affects enabled building heights.
64. Whilst retention of proposed Height Variation Controls is likely to result in some loss of efficiency, it also ensures that plan-enabled building heights required by policy 3 of the NPS-UD are reduced 'only to the extent necessary' to accommodate the values of the qualifying matter. Notably, there are areas beneath the viewshaft where the Height

Variation Controls enable increases in building height over and above what the zone would otherwise provide for, whilst still being able to comply with Chapter D19 height limitations.

65. It is therefore considered that an annotation to Height Variation Controls will be the most efficient and effective way of balancing the need to provide for intensification whilst alerting plan users to the possible effects of the AWMM Viewshaft qualifying matter on building heights. This same approach has been proposed for Height Variation Controls applying to land beneath Maunga Viewshafts.

### **Description of how the qualifying matter is to be implemented**

66. It is proposed that the AWMM Viewshaft is retained as a qualifying matter in full, including retention of Chapter D19 provisions and Figures D19.6.1.1, D19.6.1.2, and D19.6.1.3. In addition, it is proposed that the mapped AWMM Viewshaft overlay is retained as currently shown in the AUP.

### **Overall conclusion**

67. It is proposed that the AWMM Viewshaft is identified as a qualifying matter pursuant to s771(a), as a matter of national importance that decision makers are required to recognise and provide for under s6(f) of the RMA.
68. An evaluation has been carried out in relation to a number of options identified as reasonably practicable means of achieving the purpose of the RMA, which was informed by assessment carried out by an expert landscape specialist. This determined that the benefits associated with retaining the controls outweigh the costs in areas where the qualifying matter applies.
69. 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 AWMM viewshaft 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.

### Information Used

The following reports, documents, evidence, and plan versions were used to help the development of the plan change and assess the AWMM Viewshaft as a qualifying matter.

Name of document, report, plan	How did it inform the development of the plan change
Proposed Plan Change 120 Landscape Assessment – Local Public Views, Stockade Hill Viewshaft, and AWMM Viewshaft Overlays, prepared by Melean Absolum Ltd.	Expert landscape assessment supporting the s32 report.
Auckland Unitary Plan (Operative in Part 2016)	Chapters B4 Natural Heritage and D19 Auckland War Memorial Viewshaft Overlay provisions reviewed and considered in assessment of views and restrictions on development. AUP maps and Figures D19.6.1.1, D19.6.1.2, and D19.6.1.3 identify locations of the viewshafts.
Auckland Council Report on IHP Recommendations for the City Centre Zone (Plan Change 78)	Considered in development of the s32 report.
Primary Statement of Evidence of Todd Oliver Elder on behalf of Auckland Council, Planning - Topic 010B Qualifying Matters – Auckland War Memorial Museum Viewshaft Overlay (Plan Change 78)	Considered in development of the s32 report.
Statement of Primary Evidence of Melean Jill Absolum on behalf of Auckland Council, Landscape – Topic 010B – Auckland War Memorial Museum Viewshaft Overlay (Plan Change 78)	Considered in development of the s32 report.

### Consultation summary

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



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## 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.

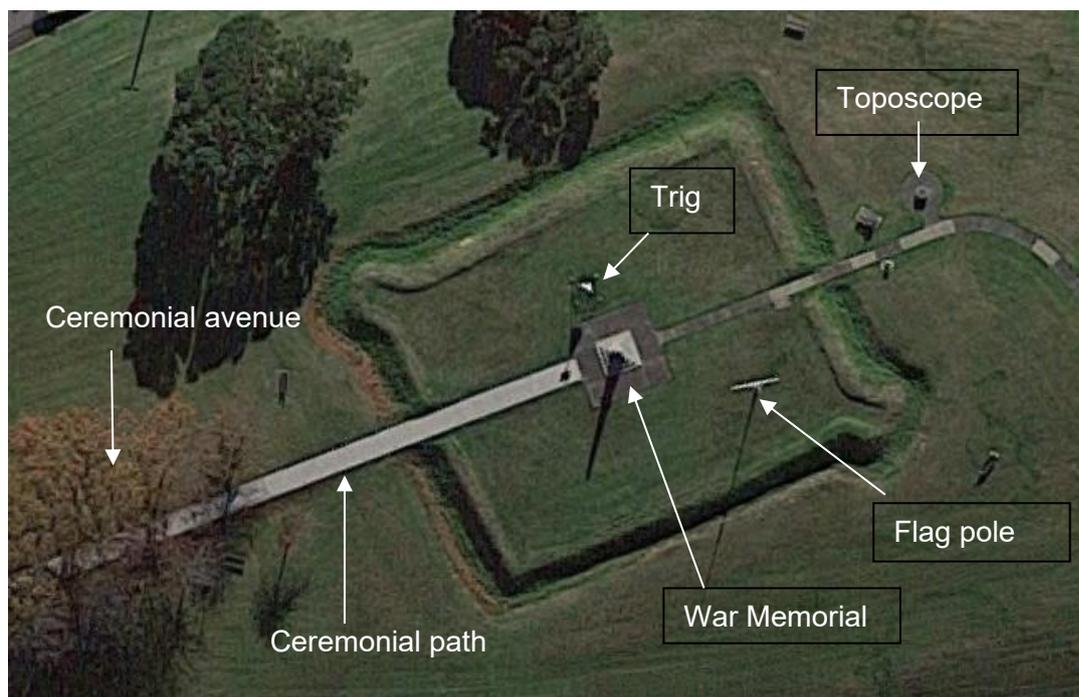
## 4 STOCKADE HILL VIEWSHAFT

### 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*).

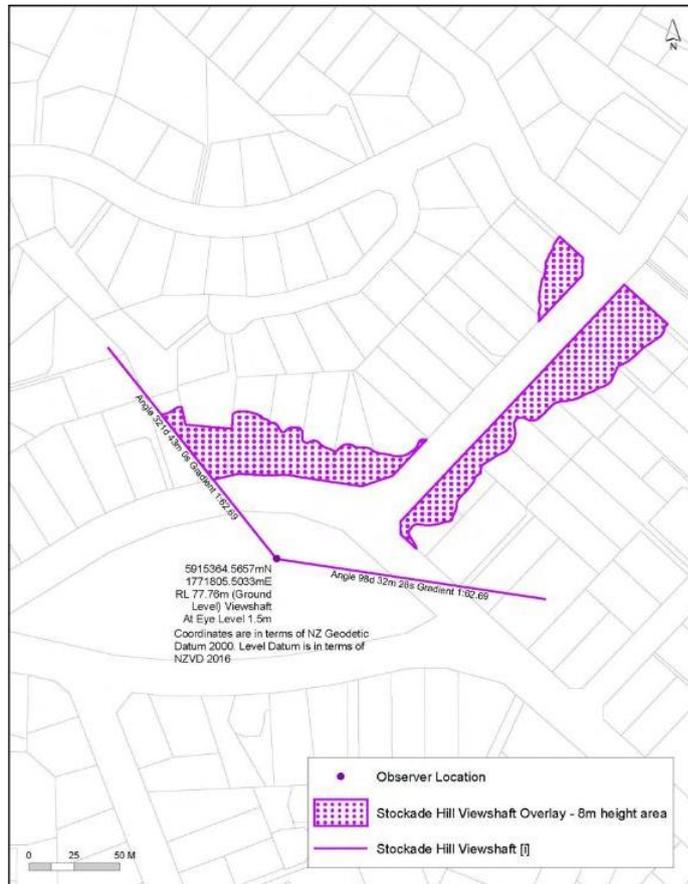
Outside the embankment on the eastern side is a toposcope, beside which is the origin of the viewshaft. These features can all be seen in the aerial photograph in **Photograph 2**, below.



**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:

a	<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.
b	<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.
c	<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.
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>	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.

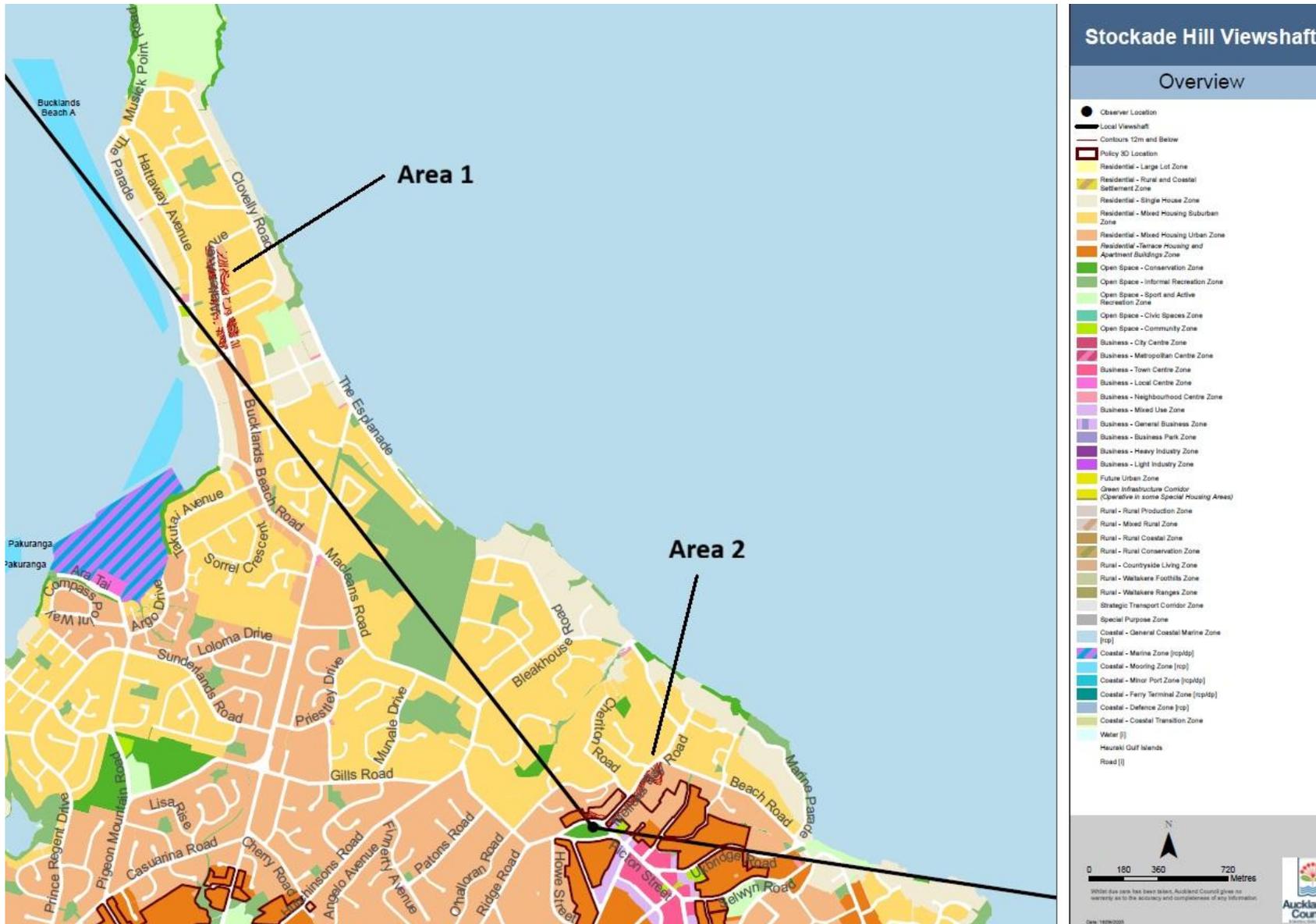
### 4.4 EFFECTS OF POLICY 3(d) NPS-UD

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 height<sup>1</sup>; or
- the gap between the viewshaft and the proposed MHU zone is less than 12m maximum building height.

<sup>1</sup> 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 sites<sup>2</sup> 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.

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

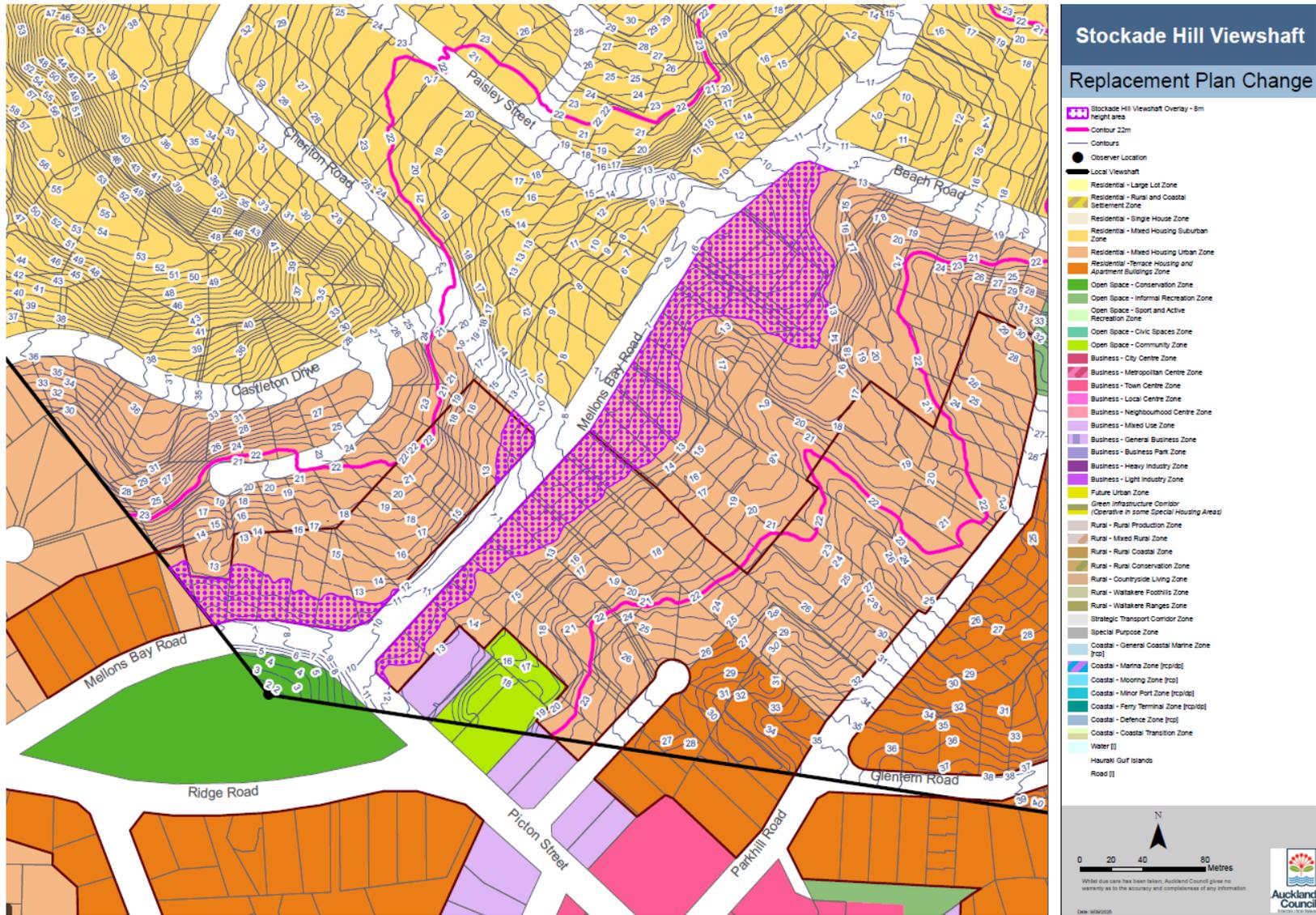
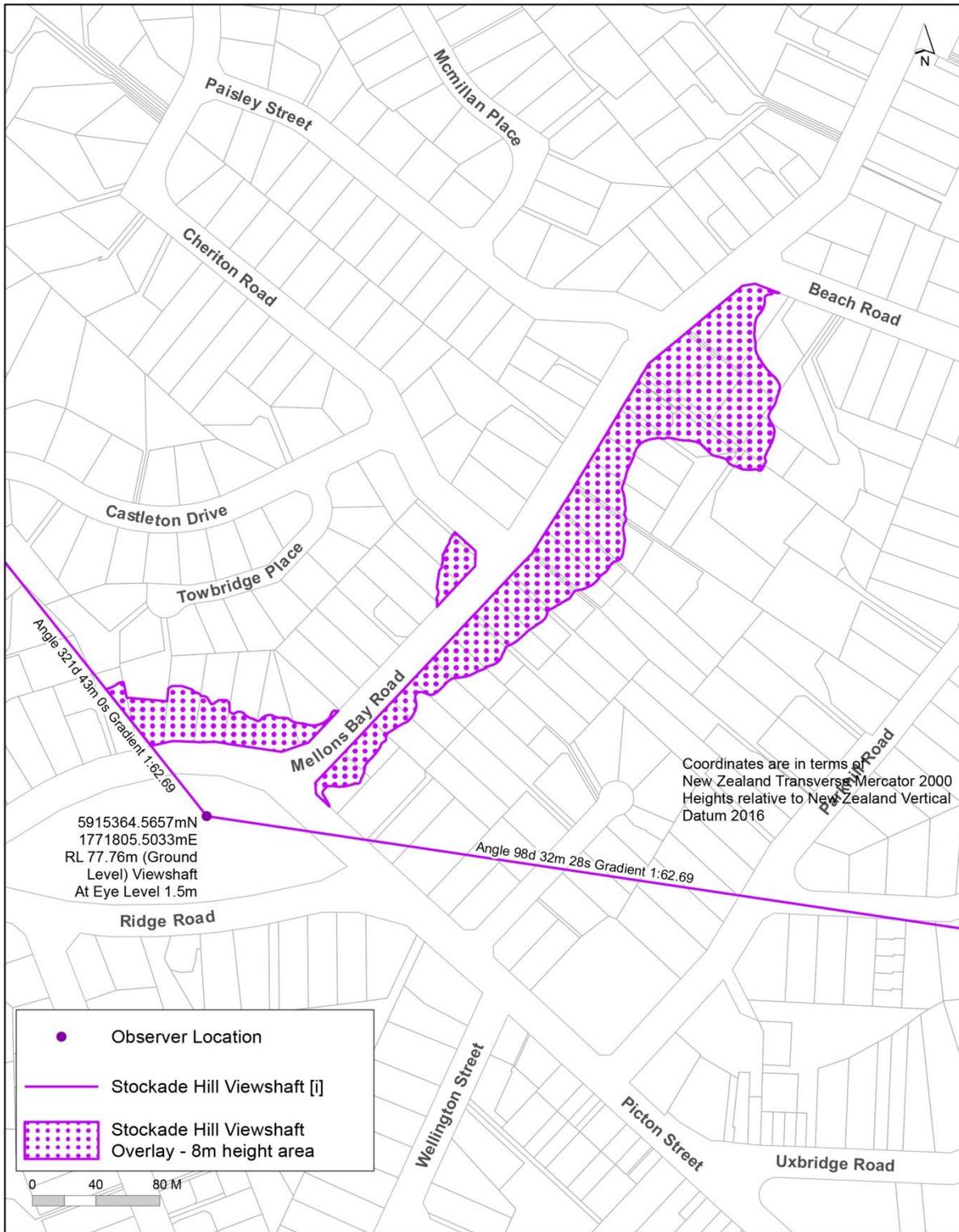


Figure 4 Stockade Hill Viewshaft with contours (Area 2)



**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.

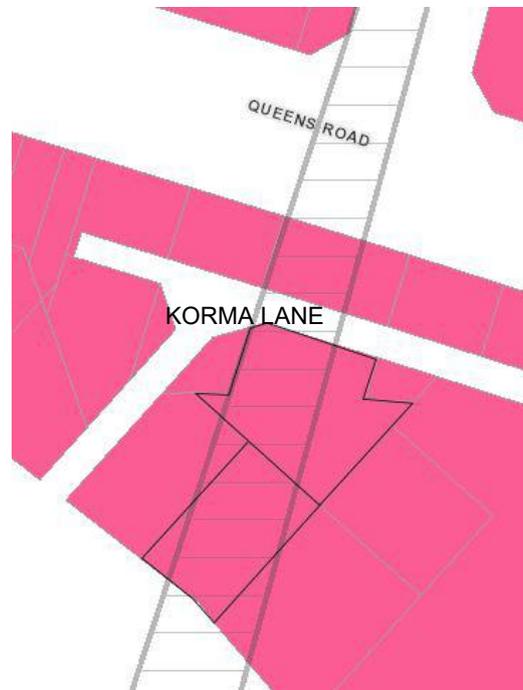
The implications of this are discussed in more detail in the individual viewshaft discussion below.

## 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.<sup>3</sup>

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

<sup>3</sup> 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.

<b>A</b>	<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>B</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
<b>C</b>	<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.
<b>D</b>	<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.

<b>A</b>	<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>B</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.
<b>C</b>	<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.
<b>D</b>	<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)

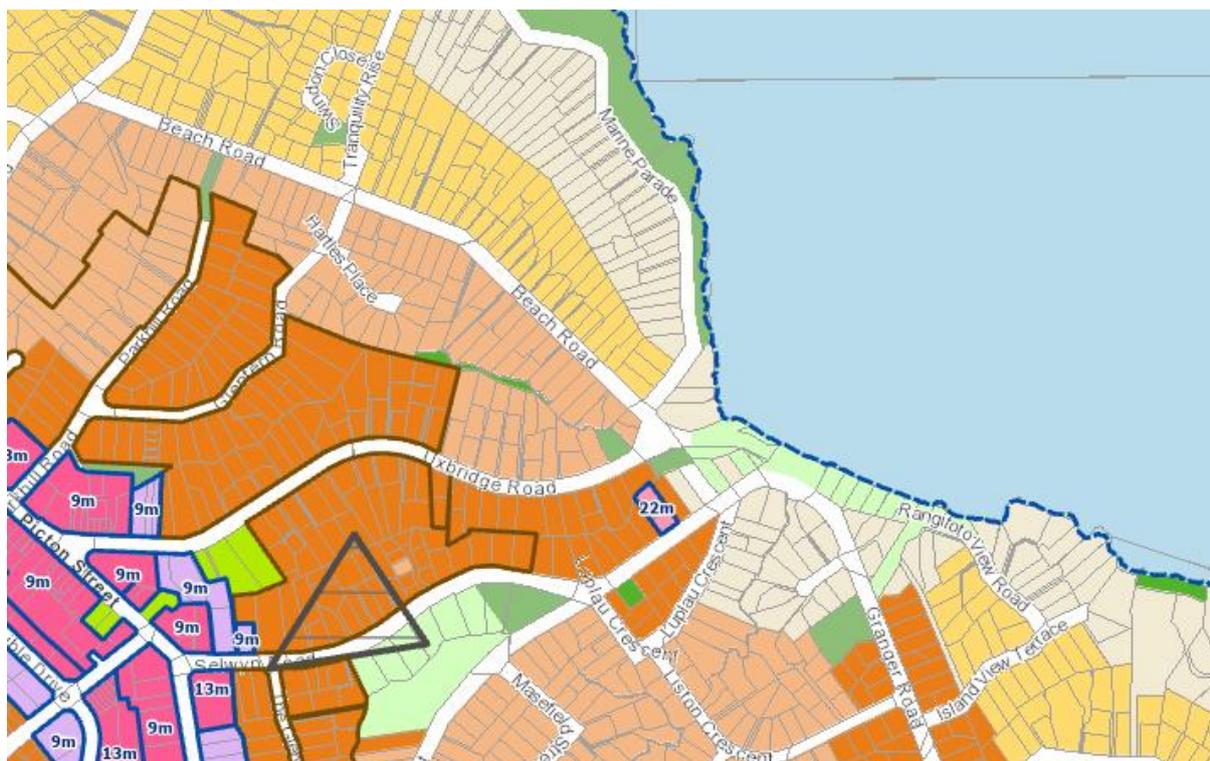
As can be seen in **Figure 10**, above left, the viewshaft, as currently illustrated in Schedule 11 of the AUP, is a triangle extending approximately 180m from the origin point. It covers an area of properties all zoned R-SH, with the Nixon Park / Howick Bowling Club land on the southern

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.

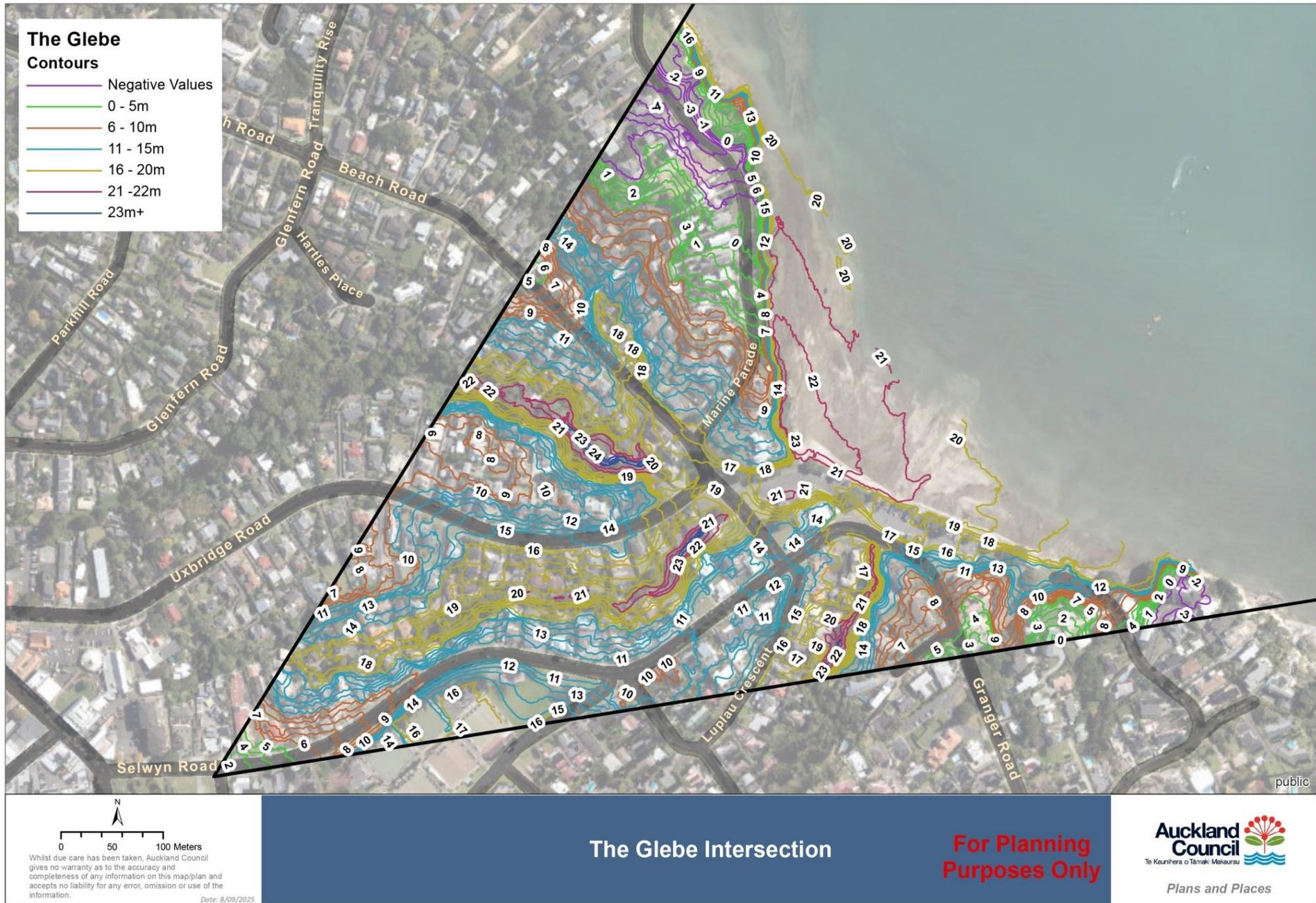
**Figure 11** below, is an excerpt from the PPC120 map showing the proposed zoning in the viewshaft and down the valley below.



**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,<sup>4</sup> exceeds the space available indicated by the contours. As well as this, there are

<sup>4</sup> 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.

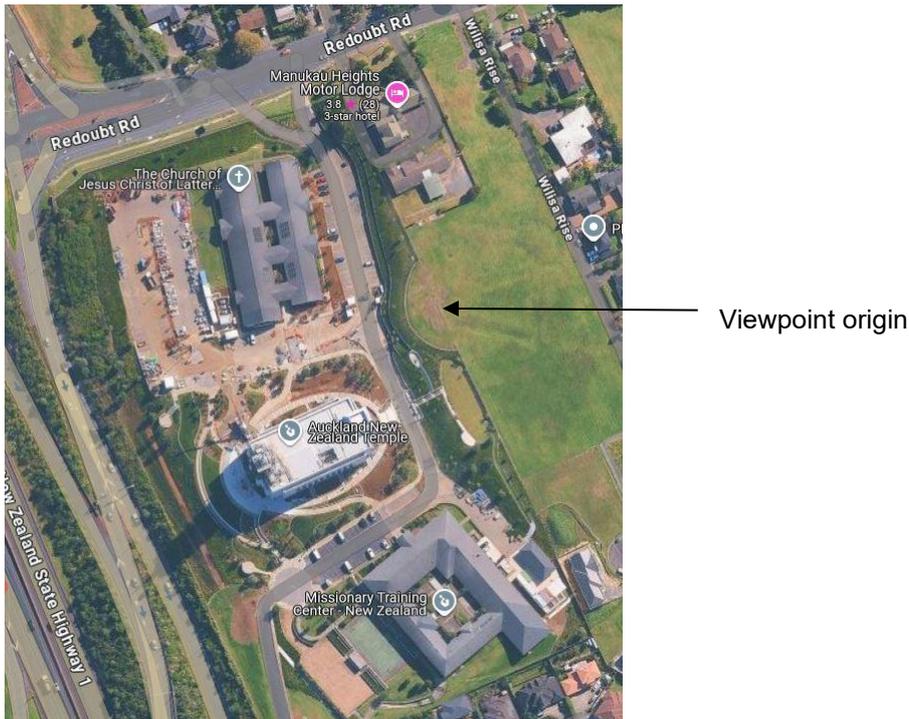
On the other hand, to appreciate that view one has to walk from the adjoining road, either up the steep eastern side of Stockade Hill, or the gentler western side. The Selwyn Road / The Glebe viewshaft is readily available to pedestrians, motorists, bus passengers and cyclists moving downhill from the 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.

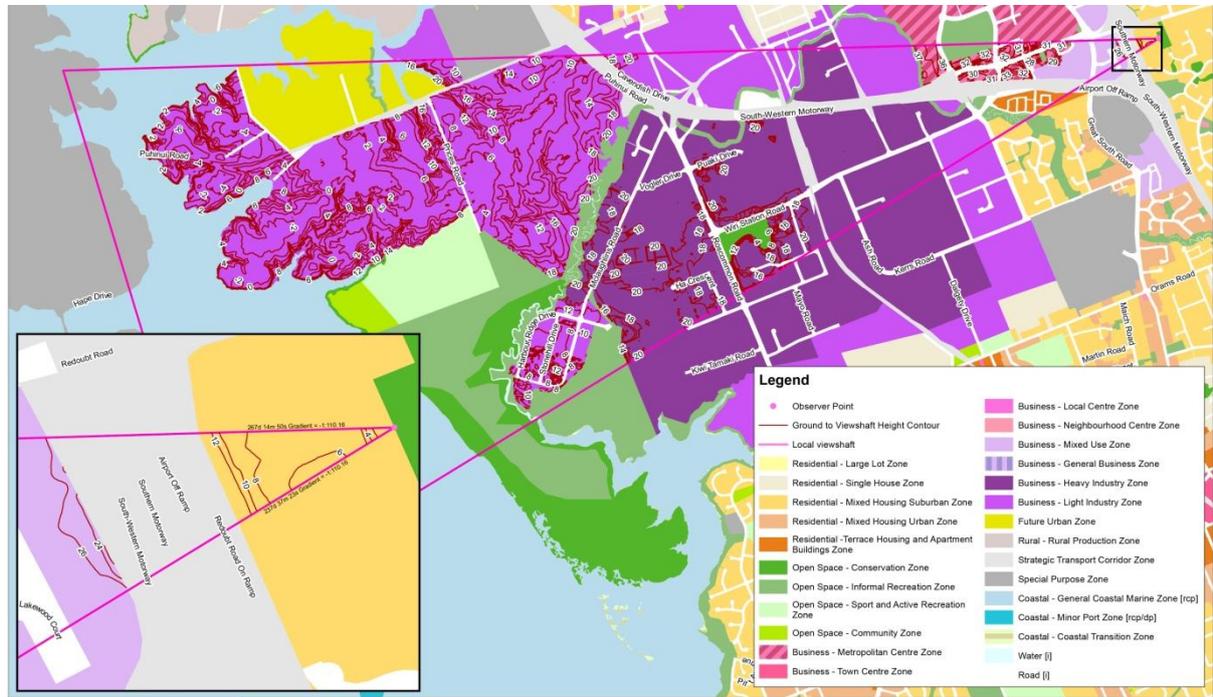


**Figure 13** The St John's Redoubt LPVO in Schedule 11 (left) and the AUP Geomaps (right)

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.

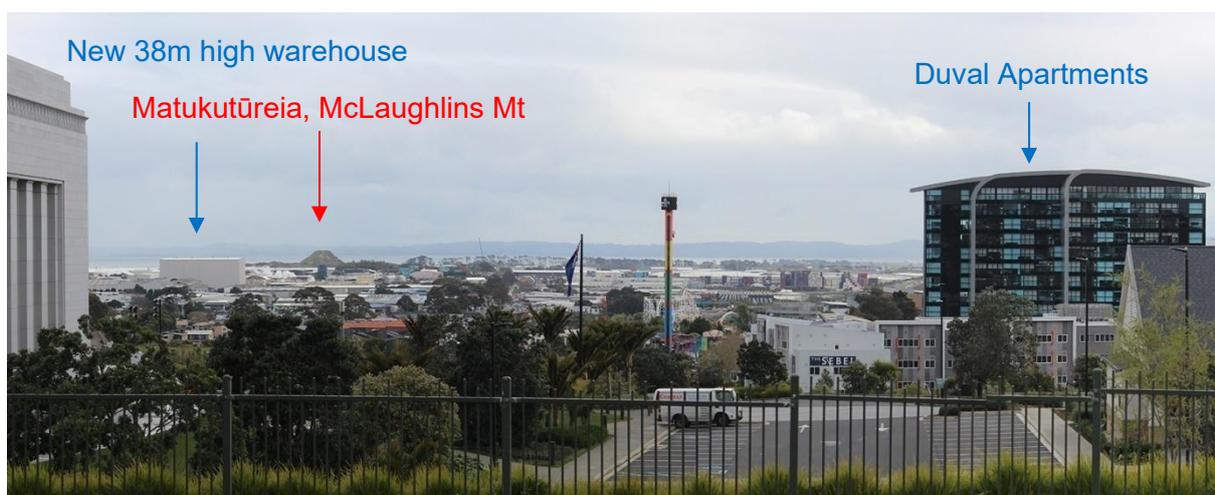
In my opinion there is little point in retaining the viewshaft at the width shown in **Figure 13**, as the view has already been curtailed by the Duval Apartment building. Additionally, as is clear in **Figure 14**, the viewshaft crosses areas of Metropolitan Centre zone at Manukau, where heights up 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 2015<sup>5</sup>



**Photograph 8** St Johns Redoubt Viewshaft as seen in 2022<sup>6</sup>



**Photograph 9** St Johns Redoubt Viewshaft as seen in 2025

<sup>5</sup> At the time of the PAUP LPVO assessment

<sup>6</sup> 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.

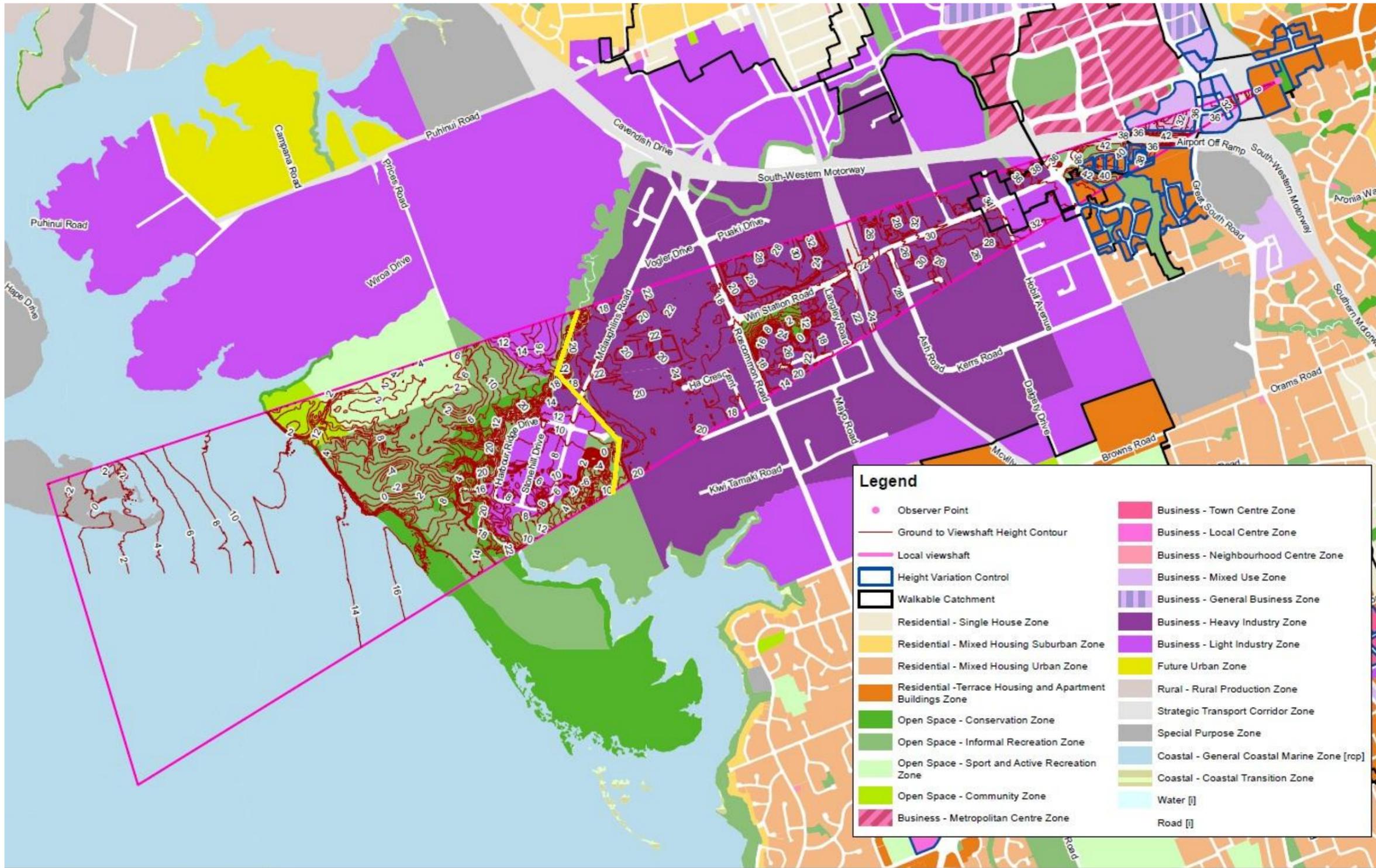
**Table 5** St Johns Redoubt viewshaft assessment against Policy D16.3.1

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.

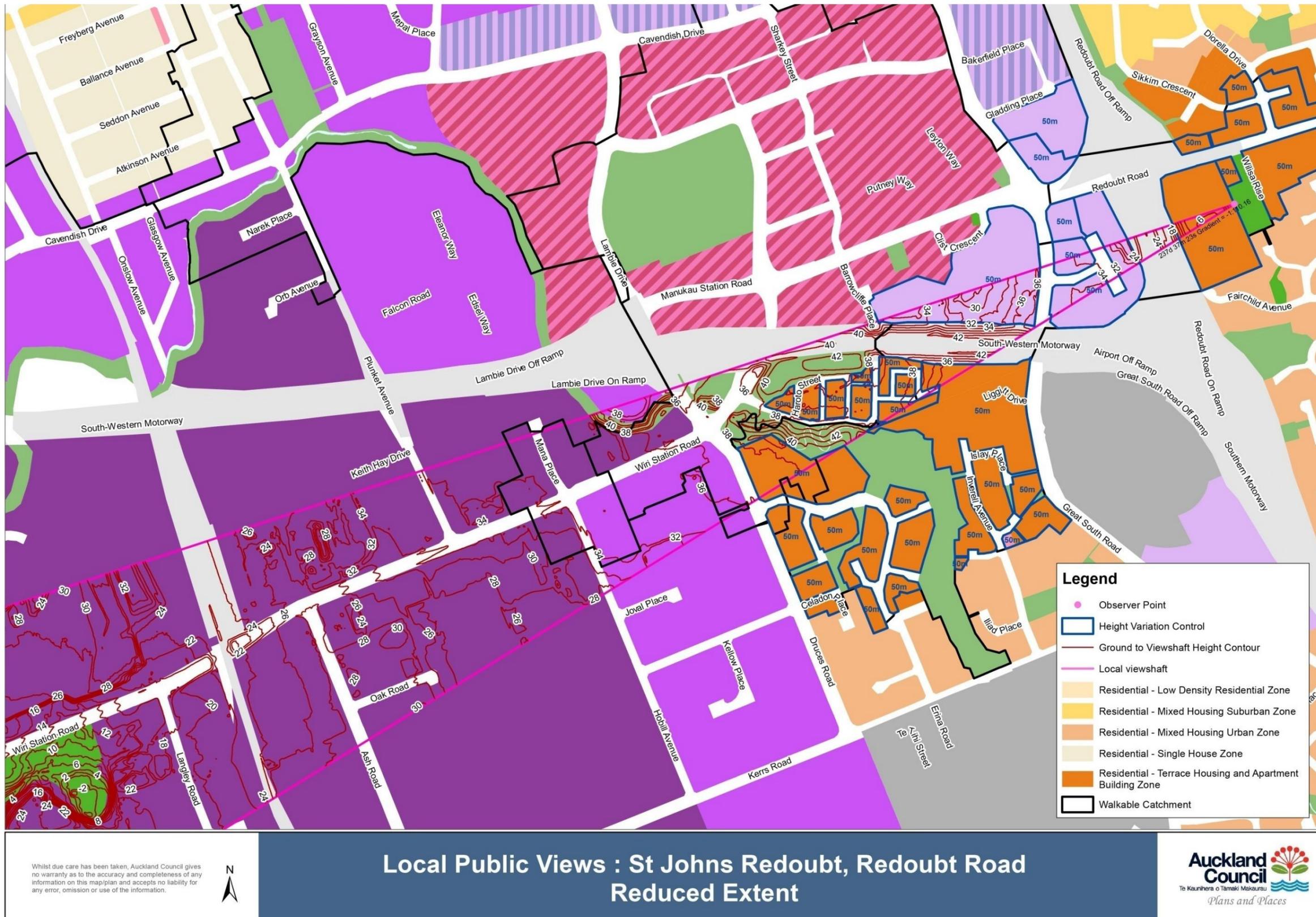


Figure 16 Narrowed viewshaft at St Johns Redoubt, eastern end.

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