



# 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 Resource Management Act 1991 for qualifying matter:**

**Local Public Views Overlay**

**EVALUATION REPORT**

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## Executive Summary

- 1) The following report addresses the evaluation required by Section 32 and Schedule 3C of the Resource Management Act 1991 (**RMA**), as it pertains to the application of Chapter D16 Local Public Views Overlay (**LPVO**) as a qualifying matter incompatible with the level of development required by Policy 3 of the National Policy Statement on Urban Development (**NPS-UD**). The scale and significance of the issues are assessed as being minor.
- 2) Chapter D16 Local Public Views Overlay of the Auckland Unitary Plan (Operative in Part) (**AUP**) manages views of the wider landscape and maritime setting that are identified as being locally significant; in particular, this relates to six views identified and scheduled within Schedule 11 of the AUP.
- 3) Of these six local public views, four are located within areas subject to Policy 3 of the NPS-UD and as a result need to be assessed against the requirements of Schedule 3C of the RMA to determine whether their retention as a qualifying matter is warranted.
- 4) The following evaluation and findings have been informed by a site-specific assessment as required by the Resource Management Act 1991 (**RMA**), comprised of expert landscape assessment and geospatial analysis. It is concluded that the additional development enabled by Policy 3 would adversely impact the values of identified local public views, which therefore require management as ‘any other matter which makes higher density’ specified by Policy 3 of the NPS-UD inappropriate.
- 5) It is proposed to retain the LPVO as a qualifying matter to restrict heights otherwise enabled as directed by Policy 3 in areas beneath three of the four specified local public views, with the qualifying matter applied to land within a walkable catchment of the Manukau Business – Metropolitan Centre Zone and the Panmure train station. It is also proposed to remove one local public view as is discussed in further detail in the following report.
- 6) The proposed application of the LPVO qualifying matter is of relatively limited spatial extent, generally being confined to a small number of sites. The reduction in development capacity and potential on these sites is appropriate, and retaining the operative method is considered to be the most effective and efficient means of ensuring the values of the LPVO are managed. A restricted discretionary resource consenting pathway remains available to applicants where buildings would exceed the specified height, and this will enable appropriate assessment as to the effects on the viewshaft.

# 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 LPVO as a qualifying matter to the requirements of clause 4(1)(b) of Schedule 3C of the RMA and the implementation of policy 3 of the NPS-UD. This report also evaluates the provisions which have been included in PC120 relating to the LPVO.
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 qualifying matters

8. For the purposes of PC120, evaluation of the LPVO 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:
- a) assessment of the AUP(OP) to identify any relevant provisions that apply to this qualifying matter
  - b) development of draft amendments to the operative district plan provisions of the AUP(OP) to implement this matter as a Qualifying Matter in accordance with the requirements of Schedule 3C of the RMA
  - c) review of the AUP(OP) to identify all relevant provisions that require a consequential amendment to integrate the application of this qualifying matter
  - d) review of the AUP(OP) Maps to assess the spatial application of this qualifying matter
  - e) review of prior landscape and planning evidence prepared for the local public views topic to support decisions on the Proposed Auckland Unitary Plan
  - f) review of submissions and further submissions on the LPVO qualifying matter through Plan Change 78
  - g) section 32 options analysis for this qualifying matter and related amendments
  - h) site visits, geospatial analysis, and specialist visual landscape assessment.

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

**Table 1. Integrated approach for any matter specified in section 77I(a) to (i) that is not currently operative in the AUP and any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD, inappropriate in an area**

| <b>Standard sec 32 steps</b>  | <b>Plus clause 8 Schedule 3C steps</b>  |
|---|---|
| <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 a qualifying matter and describe the qualifying matter.</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. Describe why the Council considers that 1 or more qualifying matters apply to the identified areas, and whether the qualifying matter is incompatible with the level of development provided by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD for that area.</p> <p>Justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.</p> <p>[refer to Section 4 of this report]</p>  |
| <p><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) of Schedule 3C of the RMA and/or Policy 3 of the NPS-UD and assess the efficiency and effectiveness of the provisions.</p> <p>Site-specific analysis that evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter.</p> <p>[refer to Section 5 of this report]</p> |

|  |  |
|--|--|
| <b>Collect information on the selected option(s)</b>   | <p>Assess the impact that limiting development capacity, building heights or density (as relevant) will have on the provision of development capacity.</p> <p>Site-specific analysis that evaluates an appropriate range of options to achieve the greatest heights and densities specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 of the NPS-UD while managing the specific characteristics.</p> <p>[refer to Section 5 of this report]</p> |
| <b>Evaluate options – costs for housing capacity</b>   | <p>Assess the costs and broader impacts of imposing those limits on development capacity.</p> <p>[refer to Section 5 of this report]</p>   |
| <b>Evaluate option(s) - environmental, social, economic, cultural benefits and costs</b>             | <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>  |
| <b>Selected method / approach</b>  | <p>Describe how the preferred approach to implementing the qualifying manner is limited to only those modifications to the extent necessary to accommodate the qualifying matter; and how the qualifying matter is applied.</p> <p>[refer to Section 5 of this report]</p>   |
| <b>Overall judgement as to the better option (taking into account risks of acting or not acting)</b> | <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 LPVO qualifying matter, the purpose of which is best described in D16.1 Overlay Description as follows:

*'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.'*

13. As is set out in the Landscape Assessment prepared by Melean Absolum Ltd and included as **Appendix 1**, the views were previously identified as being locally significant in accordance with the criteria contained within Chapter D16 of the AUP. These views were initially introduced and scheduled through legacy district plans and subsequently re-confirmed through the Proposed Auckland Unitary Plan process.
14. Operative local public views do not have associated Statements of Significance, meaning that the intended values of each individual viewshaft are not necessarily well captured or defined within the AUP. As a result, it becomes necessary to review prior visual landscape assessment and evidence to better understand the specific values of each individual viewshaft; however, it is acknowledged that there does remain a degree of subjectivity in interpreting what those values are, given the lack of any AUP Statement of Significance.
15. The LVPO provisions are to be read in conjunction with the mapped AUP overlay and Schedule 11, with the latter identifying the location of the viewshaft planes, and their surveyed viewing points. Notably, four of the six viewshafts identified in Schedule 11 are located within areas specified for additional intensification by Policy 3 of the NPS-UD as follows and require reassessment to determine whether their retention is warranted as a qualifying matter:

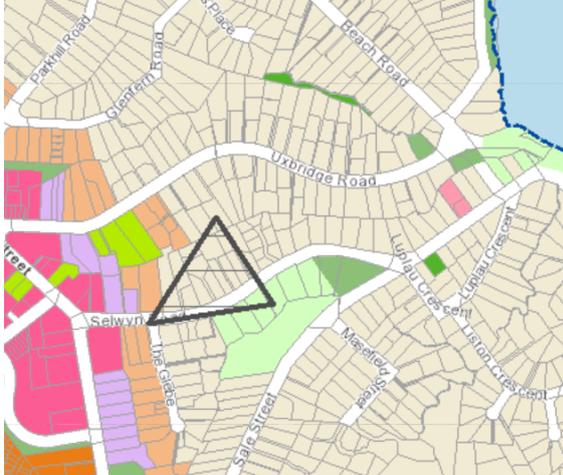
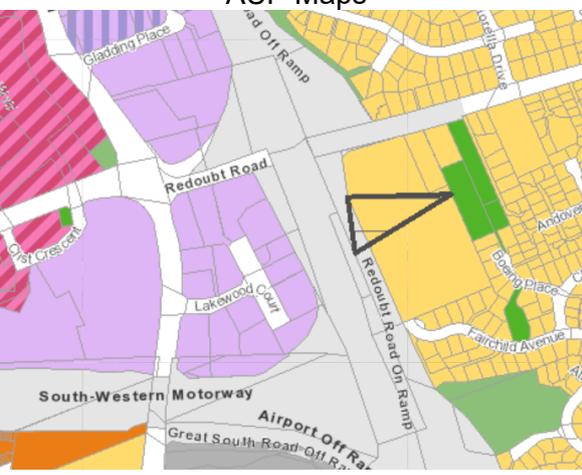
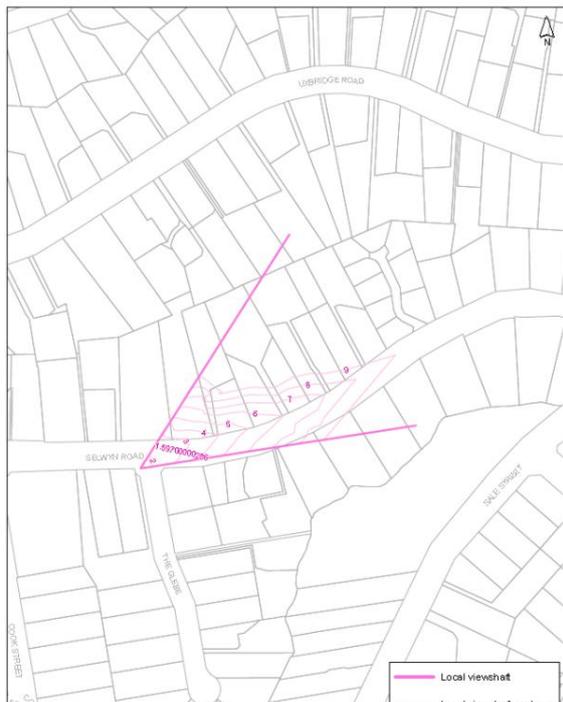
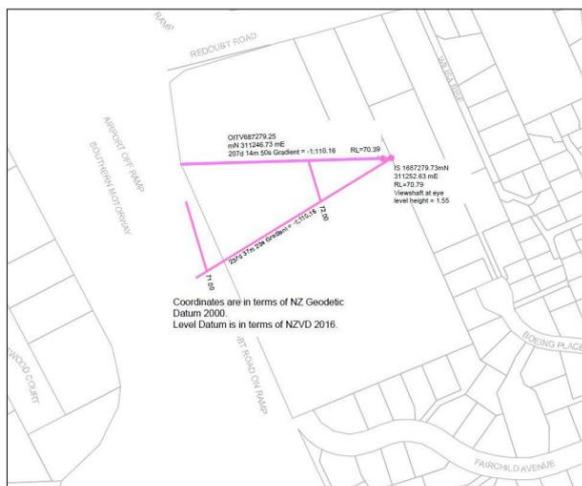
**Table 2. Local Public Views and the NPS-UD Policy 3**

| Map Reference | LPV Name  | NPS-UD Commentary  |
|---------------|---|--|
| 11.2          | Selwyn Road / The Glebe Intersection                                | Located adjacent to the Howick Town Centre Zone (Policy 3(D)), affecting predominantly residentially zoned land  |
| 11.3          | Mangemangeroa Reserve, Somerville Road / Whitford Road Intersection | N/A  |
| 11.4          | Mangemangeroa Reserve, Somerville Road                              | N/A  |
| 11.5          | St Johns Redoubt, Redoubt Road                                      | Located within a walkable catchment of the Manukau Business - Metropolitan Centre Zone (Policy 3(C)), affecting predominantly residentially zoned land                               |
| 11.6          | Queens Road, Panmure Basin  | Located within a walkable catchment of the Panmure train station (Policy 3(C)), affecting Open Space zoned land only (note the Open Space Zone is identified as a qualifying matter) |

|      |                                   |  |
|------|-----------------------------------|--|
| 11.7 | Pilkington Road,<br>Panmure Basin | Located within a walkable catchment of the Panmure train station (Policy 3(C)), affecting land zoned Business – Town Centre and Open Space (note the Open Space Zone is identified as a qualifying matter) |
|------|-----------------------------------|--|

16. The operative LPVO imposes a building height restriction in those areas that are mapped to manage intrusions into the floor of the viewshaft through one of two methods, either by identifying maximum height above existing ground level (in the case of local public views referenced 11.2, 11.3, and 11.4) or above mean sea level (in the case of local public views referenced 11.5, 11.6, and 11.7). These methods are shown in the relevant figures within Schedule 11 of the AUP.
17. Buildings and structures which intrude into the scheduled viewshaft require resource consent as a restricted discretionary activity, to enable assessment of the effects on the values of the local public view. The LPVO generally does not seek to manage other development standards that may otherwise impact densities of development such as building coverage or yard setbacks; however, if resource consent is triggered due to intrusion into the viewshaft, the bulk, location, and form of the building will be considered insofar as the views are affected.
18. In relation to the following views, the heights of development required to be enabled by Policy 3 of the NPS-UD are considered to be incompatible with the values of the LPVO as these would otherwise enable intrusions into the following local public views:
- Selwyn Road / the Glebe Intersection
  - St Johns Redoubt, Redoubt Road
  - Queens Road, Panmure Basin
  - Pilkington Road, Panmure Basin
19. The Landscape Assessment sets out findings of site-specific assessment confirming the values of each of these views against the criteria set out in Chapter D16 of the AUP. This also sets out the extent to which additional development, as enabled by Policy 3, would affect the values identified and managed by the LPVO. This is included as **Appendix 1**.
20. As described in the Landscape Assessment, the mapped Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts in the AUP maps do not convey the full extent of these viewshafts. Whilst the AUP maps indicate that there is a clear 'end limit' to these viewshafts, Maps 11.2 and 11.5 within Schedule 11 suggest that these viewshafts extend beyond what is shown in the viewer. Refer to **Table 3** below.

**Table 3. Comparison – AUP Maps and Schedule 11, Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts**

| Selwyn Rd / the Glebe Viewshaft  | St Johns Redoubt, Redoubt Road Viewshaft  |
|--|---|
| <p style="text-align: center;">AUP Maps</p>                 | <p style="text-align: center;">AUP Maps</p>   |
| <p style="text-align: center;">Schedule 11 – Map 11.2</p>  | <p style="text-align: center;">Schedule 11 – Map 11.5</p>  <p style="font-size: small;">Coordinates are in terms of NZ Geodetic Datum 2000<br/>Level Datum is in terms of NZVD 2016.</p> |

21. It is not clear how the ‘end limits’ of the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts that are shown in the AUP map viewer came to be. It is however noted that prior evidence presented on the topic of Local Public Views during the Proposed Auckland Unitary Plan process emphasises the need to manage potential viewshaft obstructions within the foreground, as outlined in the excerpt below:

*‘Some local public views are in prominent public locations but could be obstructed by buildings occurring in the foreground. The focus here is on management of these*

*foreground effects, rather than on the longer distance implications of the volcanic viewshafts.*<sup>1</sup>

22. Nonetheless, the discrepancy presents a challenge in that development beyond the mapped 'end limit' of these two viewshafts is enabled under the operative AUP and has the potential to contribute to the erosion of viewshaft values. In the case of the St Johns Redoubt, Redoubt Road viewshaft, development which does intrude into the views has already occurred beyond the mapped end limit of the viewshaft, which has affected the visual integrity of the view.
23. Whilst the above is an issue with the Operative AUP rather than an issue resulting only from PC120, the additional intensification that would be enabled by PC120 in accordance with Policy 3 has the potential to result in further intrusions, thereby exacerbating the issue if not appropriately managed.
24. On the other hand, the extension of these two viewshafts in their entirety to the coast would have substantial impacts on development capacity and in some cases would remove or reduce development potential relative to what is currently enabled under the Operative AUP. This is considered to go beyond the scope of PC120 and, where considered and recommended from a landscape perspective, are likely to best addressed through a separate plan change or through the review of the AUP.
25. With regards to the above two local public views, a range of reasonably practicable options have been considered as discussed below and in the Landscape Assessment to try to reconcile the existing values of the viewshafts with the need for their ongoing management and the requirement to enable development capacity in these locations.
26. Given the above, specific management through identification of the LPVO as a qualifying matter is required in some form. Whilst not a qualifying matter specified in section 771(a) to (i) of the RMA, the LPVO qualifying matter is considered to be 'any other matter that makes higher density, as specified by clause 4(1)(b) of Schedule 3C of the RMA or policy 3 of the NPS-UD inappropriate in an area.'

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

27. The operative AUP approach is to manage views through implementation of the LPVO, including mapped viewshafts and associated provisions which collectively seek to maintain and enhance the visual integrity of identified views.
28. In summary, the management approach in the AUP to the LPVO qualifying matter includes:
  - Chapter B4 Natural Heritage Objectives and Policies (Regional Policy Statement)
  - Chapter D16 Local Public Views Objectives and Policies
  - Chapter D16 Rules and Standards, in association with the mapped overlay
  - Chapter D16 Matters of Discretion and Assessment Criteria
  - Schedule 11 Local Public Views Schedule

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<sup>1</sup>Statement of Evidence Trevor Stewart Mackie on behalf of Auckland Council (Planning) – Topic 020 Viewshaft – Local Public Views for the Proposed Auckland Unitary Plan, at paragraph 9.1.

29. This approach in the AUP was extensively addressed through the Proposed AUP hearings process that occurred in 2014 – 2016.
30. The relevant AUP objectives and policies that support the qualifying matter are as shown below in the table:

**Table 4. AUP Objectives and Policies relevant to the LPVO**

| 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 landscape to Mana Whenua;</i></li> <li>(e) <i>The extent to which there are other similar public views; and</i></li> <li>(f) <i>Taking into account the extent to which the viewshaft will affect future development otherwise enabled by this Plan.</i></li> </ul> <p><b>Policy B4.3.2.(6)</b> <i>Include a view in Schedule 11 Local</i></p> | <p>Objectives and policies within Chapter B4 Natural Heritage provide overarching direction enabling the identification, evaluation, and management of significant views to the local environment, ridgelines, and landscapes.</p> <p>Policy B4.3.2.(5) outlines specific considerations to have regard to in identifying and evaluating views to the coastal environment, ridgelines, and landscapes, including their local or regional significance.</p> <p>Policy B4.3.2.(6) provides for the scheduling of local public views where they meet relevant criteria.</p> |

| AUP Chapter                           | Objective / Policy   | Summary of matter addressed  |
|---------------------------------------|--|--|
|                                       | <i>Public View Schedule if it is locally significant.</i>  |  |
| <b>Chapter D16 Local Public Views</b> | <p><b>Objective D16.2.(1)</b> <i>Locally significant public views are managed to maintain and enhance the visual integrity of the views.</i></p> <p><b>Policy D16.3.(1)</b> <i>Identify and evaluate significant local public viewshafts using the following criteria:</i></p> <ul style="list-style-type: none"> <li>(a) <i>The extent to which the public viewshaft contributes to the aesthetic value or visual legibility of the wider natural landscape.</i></li> <li>(b) <i>The community association with, or public appreciation of, the values of the viewshaft.</i></li> <li>(c) <i>The visual coherence, unity or integrity of the viewshaft and its view; and</i></li> <li>(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></li> </ul> <p><b>Policy D16.3.(2)</b> <i>Manage development on sites within the viewshafts to avoid adverse physical and visual effects on the viewshaft including adverse cumulative effects on the viewshaft.</i></p> | <p>Objectives and policies within Chapter 16 collectively seek to provide for the evaluation, identification, and management of locally significant public views.</p> <p>Provisions seek to maintain and enhance the visual integrity of identified views, and avoid adverse effects of unmanaged development on the viewshafts.</p> |

31. The AUP 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.

32. Chapter D16 manages locally significant public views in order to maintain and enhance their visual integrity. The views are of Auckland's wider landscape and maritime setting and

provide a sense of identity at the local level. Individual viewing points, and their locally significant viewshafts from public places, contribute to the unique character of many of Auckland's neighbourhoods and coastal areas.

33. Policy D16.3.(1) in particular sets out criteria for the evaluation and identification of local public views for scheduling. Each local public view has been re-assessed against these criteria as part of the Landscape Assessment in **Appendix 1** in order to confirm whether as viewed today these would continue to satisfy the relevant criteria.
34. In assessing each local public view against the criteria in Policy D16.3.(1), it is important to also have regard to the higher order direction afforded by Policy B4.3.2.(5). Whilst these are generally similar, with Chapter D16 objectives and policies having given effect to RPS policies, there are several notable differences. In particular, and in evaluating viewshafts, Policy B4.3.2.(5) specifically highlights the importance of the view and landscape to Mana Whenua and the extent to which there are similar public views. In identifying viewshafts for protection, it also enables consideration of the costs to development of that protection and/or management.
35. Collectively, the Objectives and Policies identified above provide for the identification and management of significant views, including local public views. Objective D16.2.(1) sets out the overarching objective of Chapter D16, being that 'locally significant public views are managed to maintain and enhance the visual integrity of the views.'
36. In addition, it needs to be recognised that some of the LPVO scheduled views are of the Hauraki Gulf and its Islands. When considering the range of densities for these areas covered by this viewshaft and associated height limits, the Hauraki Gulf Marine Part Act 2000 (HGMPA) needs to form part of this consideration. Specifically, it is considered these Overlays contribute to Objectives (d) and (e) of Section 8, which are as follows:

### **8 Management of Hauraki Gulf**

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

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

37. The Landscape Assessment included in **Appendix 1** has considered the policy direction discussed above in carrying out site specific assessment and in making recommendations.
38. All four of the local public views that have been re-assessed are considered to be incompatible with the level of development provided by clause 4(1)(b) of Schedule 3C of the

RMA or policy 3 of the NPS-UD for that area, noting that the building heights provided for would enable intrusions into these viewshafts. This would be inconsistent with the maintenance and enhancement of the visual integrity of these views sought by Objective D16.2.(1).

39. Notwithstanding the above, some of these local public views are more strongly aligned with the evaluation criteria and policy direction than others. This has been considered in the development of options discussed below, including the evaluation of the costs and benefits of each of these options.

### **Rules and methods (existing)**

40. As has been discussed above, the primary means of managing the values within the LPVO is through application of height restrictions in specified locations under the viewshafts, based on either maximum height above ground level or maximum height above mean sea level as outlined in Schedule 11. The LPVO does not manage other development standards that may otherwise impact densities of development, such as building coverage or yard setbacks.
41. The AUP maps depict the spatial extent of the viewshafts, and are used in determining whether Chapter D16 applies to a site. In the event that a site is located within the mapped viewshaft, plan users are directed to Chapter D16 and Schedule 11 to determine the applicable maximum building heights which apply across the site and the relevant AUP provisions.
42. Chapter D16 contains two rules managing potential intrusions into the viewshaft. Rule D16.4.1.(A2) in particular requires resource consent as a restricted discretionary activity where buildings or structures intrude into the viewshaft. Associated matters of discretion in D16.8.1. and assessment criteria in D16.8.2. enable assessment of (a) the effects of the intrusion on the integrity and on values of the local public view, (b) the functional or operational need for the intrusion, and (c) whether there are practicable alternatives.
43. As noted in the Landscape Assessment in **Appendix 1** and referenced above, it is acknowledged that operative and legacy mapping (pre-dating the AUP) of the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road viewshafts do not convey the full extent of these viewshafts, which has in some instances enabled development to occur beyond the viewshaft 'end limits' that has compromised the visual integrity of the viewshaft.
44. The above is a technical issue associated with the operative provisions and mapping in the AUP, however could potentially be exacerbated by the level of development otherwise enabled in Policy 3 areas.

## **5. Development of Options**

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

- measures to better manage significant risks from natural hazards region-wide; and
- an amended approach to managing housing growth as a result of no longer incorporating the medium density residential standards (MDRS), but providing for intensification in a way that complies with clause 4 of Schedule 3C of the RMA by:
  - providing at least the same amount of housing capacity as would have been enabled if Plan Change 78: Intensification (PC78), as notified, was made operative, including by providing for additional intensification along selected Frequent Transit corridors and modifying zoning in suburban areas through an amended pattern of Residential - Mixed Housing Urban and Mixed Housing Suburban zones;
  - enabling the building heights and densities specified in clause 4(1)(b) and (c) of Schedule 3C of the RMA within at least the walkable catchments of Maungawhau (Mount Eden), Kingsland, Morningside, Baldwin Avenue and Mount Albert Stations;
  - giving effect to Policy 3 (c) and (d) of the National Policy Statement on Urban Development 2020 (NPS-UD) through intensification in other walkable catchments and land within and adjacent to neighbourhood, town and local centres;
  - enabling less development than that required by clause 4(1)(b) and (c) of Schedule 3C or Policy 3 of the NPS-UD where authorised to do so by clause 8 of schedule 3C.

Section 32 requires a range of options to be considered.

46. In addition, as the LPVO qualifying matter is a qualifying matter that is "any other matter that makes higher density, as specified by clause 4(1)(b) or (c) of Schedule 3C of the RMA or policy 3 inappropriate in the area", a site-specific analysis is required that evaluates an appropriate range of options to achieve the greatest heights and densities specified by policy 3 of the NPS-UD, while managing the specific characteristics.
47. With regards to the LPVO, site-specific assessment undertaken included expert landscape assessment informed by site visits and geospatial analysis to identify locations where zone building heights may otherwise enable intrusion into the viewshafts that would affect the values of the viewshafts. The Landscape Assessment also considered where modifications may be required to these viewshafts to ensure that values are effectively managed.
48. As previously noted, the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts present particular challenges given that the full extent of the viewshafts are not shown in the operative AUP maps. This reduces the effectiveness of these viewshafts as a planning tool and can lead to erosion of viewshaft values over time.
49. As such, and in developing and evaluating options for the management of local public views relative to the need to provide for intensification *generally*, specific consideration was given to the following sub-options for the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts through the Landscape Assessment:
- Extension of the mapped viewshaft to the coastal edge; and/or
  - Extension of the mapped viewshaft to an alternative end limit and/or other modifications, including narrowing and/or realignment of the viewshaft; and/or
  - Deletion of the viewshaft.

50. With regard to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts, the Landscape Assessment notes:

Selwyn Road / the Glebe Intersection

- Were the viewshaft to be retained, the current mapped viewshaft would need to be extended to a point nearer to or at the coast in order to effectively manage the viewshaft values.
- ‘The view actually increases briefly as one travels down Selwyn Road<sup>2</sup>,’ such that similar views would also continue to be available to those travelling down Selwyn Road from Howick Town Centre as a result of the topography, presence and orientation of Selwyn Road and Nixon Park relative to the coast, if the viewshaft were to be deleted as a qualifying matter.
- The Selwyn Road / the Glebe Intersection viewshaft is situated proximal to the Stockade Hill viewshaft, which provides ‘a much wider panorama and an even better understanding of the relationship of Howick to the Hauraki Gulf and its islands.’<sup>3</sup>
- Does not definitively conclude whether the viewshaft should be retained or deleted as a qualifying matter through PC120.

St Johns Redoubt, Redoubt Road

- Recommends narrowing and realigning the viewshaft and extending to an ‘end limit’ nearer the coast, within Wiri. This would extend over land zoned (or proposed to be zoned through PC120) Business – Mixed Use, Business – Heavy Industry, Business – Light Industry, and Residential – Terrace Housing and Apartment Buildings.

51. Having regard to the recommendations in the Landscape Assessment, a range of reasonably practicable options have been considered with respect to the management of local public views relative to the need to provide for intensification as directed by the NPS-UD. Options were narrowed down to four for further evaluation as part of this report, which is considered to be appropriate given the scale and significance of the issues; variations were also considered where a distinct response was required for one or more individual viewshafts.

52. The four options that have been evaluated in the section 32 and Schedule 3C assessment of the LPVO qualifying matter are:

- **Option 1:** Implement Policy 3 and apply the LPVO as a qualifying matter, including extending and modifying the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts.

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<sup>2</sup> Proposed Plan Change 120 Landscape Assessment – Local Public Views, Stockade Hill Viewshaft, and AWMM Viewshaft Overlays, prepared by Melean Absolum Ltd, at Table 4.

<sup>3</sup> Proposed Plan Change 120 Landscape Assessment – Local Public Views, Stockade Hill Viewshaft, and AWMM Viewshaft Overlays, prepared by Melean Absolum Ltd, on page 22.

*This option would implement Policy 3 of the NPS-UD as directed; however development capacity would be tempered by the retention of the LPVO as a qualifying matter.*

*Noting that the operative AUP maps do not reflect the full extent of the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts, this option would see the mapped viewshafts extended and modified as specified in paragraph 50 above.*

- **Option 2:** Implement Policy 3 and apply the LPVO as a qualifying matter, in its current operative form.

*This option would implement Policy 3 of the NPS-UD as directed; however development capacity would be tempered by the retention of the LPVO as a qualifying matter.*

*The Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts would not be extended beyond that currently mapped in the Operative AUP.*

- **Option 3:** Implement Policy 3 and apply the LPVO as a qualifying matter as it pertains to the Queens Road and Pilkington Road, Panmure Basin viewshafts, and to remove both the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts as qualifying matters.

*This option would implement Policy 3 of the NPS-UD as directed; however development capacity would be tempered by the retention of the LPVO as a qualifying matter as it pertains to the Queens Road and Pilkington Road, Panmure Basin viewshafts.*

*The Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts would be removed and would not be identified as qualifying matters.*

- **Option 4:** Implement Policy 3 and do not apply the LPVO as a qualifying matter.

*This option would implement Policy 3 of the NPS-UD as directed in full, and the LPVO would be removed as it relates to the four local public views coinciding with Policy 3 areas.*

53. It is acknowledged that time constraints have not enabled meaningful engagement with the community and Mana Whenua in regards to the possible deletion of any local public views. This means that any recommendation in this report has had to rely on information previously available, the implications of which is discussed further below in terms of the risks of acting or not acting.

## Consequences for development capacity

54. The consequences for the provision of development capacity by accommodating the LPVO qualifying matter are to restrict building heights within the mapped extent of the viewshafts, by requiring restricted discretionary consent where development is proposed which would intrude into the floor of the viewshafts.
55. The scale and significance of the issues are assessed as being minor. At a regional scale, the impact of the LPVO on development capacity is generally indiscernible with most options being considered; however the impact on development capacity increases noticeably with Option 1, particularly at a local level.
56. Table 5 below evaluates the impacts on development capacity of each of the four options being considered through this evaluation. **Appendix 2** includes a list of sites located within the viewshafts, as per the preferred option.

## Evaluation of options

57. To determine the most appropriate response for the LPVO as a qualifying matter, each of the options needs to be evaluated in the context of the objectives and policy 3 of the NPS-UD. The below evaluation has been informed by the Landscape Assessment included as **Appendix 1**.

**Table 5. Evaluation of options**

| Qualifying matter                                       | Option 1   | Option 2  | Option 3  | Option 4  |
|---|--|---|---|---|
| <b>Costs</b>  |  |   |   |   |
| <b>Costs of applying QM – housing supply / capacity</b> | <p><b>High cost</b></p> <p>Likely to lead to substantial effect on plan enabled development capacity, including within Policy 3(b), 3(c), and 3(d) areas. Extension of the St Johns Redoubt, Redoubt Road Viewshaft in particular would heavily impact the Manukau Metropolitan Centre Zone and its walkable catchment if the viewshaft were to be extended.</p> | <p><b>Low cost</b></p> <p>The qualifying matter would be applied to a select number of sites only – in particular:</p> <ul style="list-style-type: none"> <li>Two sites zoned Business – Town Centre (Pilkington Road, Panmure Basin viewshaft)</li> <li>One site zoned for THAB including 50m building heights (St Johns Redoubt)</li> <li>17 sites zoned for THAB (Selwyn Road / the Glebe)</li> </ul> <p>The LPVO would also extend over the Open Space zone, however the Open Space Zone has been identified as having qualifying</p> | <p><b>Some cost</b></p> <p>The qualifying matter would be applied and would restrict building heights on two sites within the Business – Town Centre Zone only.</p> <p>The LPVO would also extend over the Open Space zone, however the Open Space Zone has been identified as having qualifying matters requiring height restrictions in any case.</p> | <p><b>No cost</b></p> <p>The qualifying matter would not be applied, and therefore Policy 3 would be implemented in full. There would be no cost to development capacity in these areas</p> |

| Qualifying matter           | Option 1  | Option 2  | Option 3  | Option 4  |
|-----------------------------|---|---|---|---|
|                             |   | <p>matters requiring height restrictions in any case.</p> <p>The effect on development capacity is likely to be largely indiscernible at a regional scale, and only minor at the local scale.</p>   |   |   |
| <p><b>Costs: Social</b></p> | <p><b>High cost</b></p> <p>Will provide for the ongoing maintenance and enhancement of all four identified local public views.</p> <p>Will impose further constraints on the degree to which a range of dwellings and business can locate within and close to transport, amenities and services, which will have social costs to prospective residents and businesses. Most of this cost would be associated with the extension of the St Johns Redoubt, Redoubt Road Viewshaft, and to a lesser degree the Selwyn Road / the Glebe Intersection viewshaft.</p> | <p><b>Low cost</b></p> <p>Will provide for the ongoing maintenance and enhancement of two local public views in full and two local public views in part.</p> <p>Will have some cost on the degree to which dwellings may locate proximal to transport, amenities, and services, albeit quite limited.</p> | <p><b>Low-moderate cost</b></p> <p>Will provide for the ongoing maintenance and enhancement of certain local public views to be retained.</p> <p>This option would result in costs to local communities associated with the loss of two local public views that have been identified through various processes as having local significance, and subsequently managed and protected for several decades.</p> <p>In the case of the St Johns Redoubt, Redoubt Road Viewshaft, this cost would include the potential loss of connection between the redoubt itself and the landscapes to the west.</p> <p>In the case of the Selwyn Road / the Glebe Intersection viewshaft, some of the cost associated with the loss of the viewshaft would be moderated by the retention of the Stockade Hill Viewshaft as a qualifying matter which provides for similar, more expansive views from a highly visited public place. The Stockade Hill Viewshaft qualifying matter is discussed in a separate report.</p> | <p><b>High cost</b></p> <p>This option would result in costs to local communities associated with the loss of views that have been identified through various processes as having local significance, and subsequently managed and protected for several decades.</p> |

| <b>Qualifying matter</b>    | <b>Option 1</b>  | <b>Option 2</b>   | <b>Option 3</b>  | <b>Option 4</b>   |
|-----------------------------|--|---|--|---|
| <b>Costs: Economic</b>      | <p><b>High cost</b></p> <p>There would be much greater cost to applicants involved in developments beneath the extended viewshafts. There would also be costs to Council in interpreting and implementing the provisions.</p> <p>There are also costs to economic activity resulting from the dispersal of development, due to reduced development capacity within and adjacent to transport, amenities, and services.</p> | <p><b>Low-moderate cost</b></p> <p>There are costs to plan users and Council in interpreting and implementing the provisions, particularly given the disconnect between Chapter D16 objectives and policies and the mapped extent of the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts.</p>  | <p><b>Low cost</b></p> <p>Some costs to plan users and Council in interpreting and implementing the provisions, albeit less so than Option 2.</p> <p>There may be some cost to economic activity associated with reduction in local visitors to the viewing points for Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts.</p> | <p><b>Low cost</b></p> <p>No administrative and/or resource consenting costs associated with implementing provisions in these areas.</p> <p>However, there may be some cost to economic activity associated with reduction in local visitors to these places to appreciate the views.</p> |
| <b>Costs: Environmental</b> | <p><b>High cost</b></p> <p>Likely to result in greater emissions as a result of business/residential activities having to locate further from transport, services, and amenities.</p>  | <p><b>Moderate cost</b></p> <p>Would result in some loss of the connection communities have with their local landscapes and environment, particularly appreciation of the coastal environment; notably whilst building intrusions will be managed in the immediate foreground of the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts, intrusions may occur beyond the AUP mapped end limits of these viewshafts.</p> <p>Some cost associated with increase in emissions as a result of business/residential activities having to locate further from transport, services, and amenities, albeit limited.</p> | <p><b>Moderate cost</b></p> <p>Would result in some loss of the connection communities have with their local landscapes and environment, particularly appreciation of the coastal environment as it relates to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts.</p>   | <p><b>High cost</b></p> <p>Would result in loss of the connection communities have with their local landscapes and environment, particularly appreciation of the coastal environment in relation to the four local public views requiring reassessment through this plan change.</p>      |
| <b>Benefits</b>             |  |   |  |   |

| <b>Qualifying matter</b>                    | <b>Option 1</b>   | <b>Option 2</b>  | <b>Option 3</b>   | <b>Option 4</b>  |
|---|---|--|---|--|
| <b>Benefits of applying the QM – social</b> | <p><b>High benefit</b></p> <p>This is considered to contribute to communities' appreciation of distinctive local landscapes and connections to the coastal environment.</p> | <p><b>Moderate benefit</b></p> <p>This is considered to contribute to communities' appreciation of distinctive local landscapes and connections to the coastal environment; however the benefits are reduced compared to Option 1, particularly in relation to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts.</p> <p>There is considered to be social benefit to enabling more development close to transport, amenities and services relative to Option 1.</p> | <p><b>Moderate benefit</b></p> <p>This is considered to contribute to communities' appreciation of distinctive local landscapes and connections to the coastal environment; however the benefits are reduced compared to Option 1, particularly in relation to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts.</p> <p>There is considered to be social benefit to enabling more development close to transport, amenities and services relative to Option 1.</p>  | <p><b>Low-moderate benefit</b></p> <p>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 Options 2 and 3.</p>  |
| <b>Benefits - economic</b>                  | <p><b>Low benefit</b></p> <p>There are some benefits to economic activity expected associated with locals visiting the viewing points.</p>                                  | <p><b>Low-moderate benefit</b></p> <p>There are some benefits to economic activity expected associated with locals visiting the viewing points, albeit less than option 1.</p> <p>Enabling people to live and work closer to transport options, amenities, and services is expected to have some economic benefit to businesses, compared to Option 1.</p>   | <p><b>Moderate benefit</b></p> <p>Costs of implementing the qualifying matter both for Council and plan users, including in the number and complexity of resource consents, will be lower compared to options 1 and 2.</p> <p>There are some benefits to economic activity expected associated with locals visiting the viewing points, albeit less than options 1 and 2.</p> <p>Enabling people to live and work closer to transport options, amenities, and services is expected to have some economic benefit to businesses, compared to Option 1.</p> | <p><b>Moderate benefit</b></p> <p>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.</p> <p>Enabling people to live and work closer to transport options, amenities, and services is expected to have some economic benefit to businesses; however this is not expected to be inherently different from what would otherwise arise from Options 2 and 3.</p> |
| <b>Benefits - environmental</b>             | <p><b>Moderate benefit</b></p> <p>Would support the connection communities have with their local landscapes and</p>   | <p><b>Moderate-high benefit</b></p> <p>Would support the connection communities have with their local landscapes and environment,</p>  | <p><b>Moderate-high benefit</b></p> <p>Would support the connection communities have with their local landscapes and environment,</p>   | <p><b>Low-moderate benefit</b></p> <p>Enabling people to live and work closer to transport options, amenities, and services will support reduction in</p>  |

| Qualifying matter | Option 1  | Option 2  | Option 3  | Option 4  |
|-------------------|---|---|---|---|
|                   | environment, particularly appreciation of the coastal environment in relation to the four local public views. | particularly appreciation of the coastal environment in relation to the four local public views, albeit less than Option 1.<br><br>Enabling people to live and work closer to transport options, amenities, and services will support reduction in greenhouse gas emissions, particularly compared to Option 1. | particularly appreciation of the coastal environment in relation to the four local public views, albeit less than Option 1.<br><br>Enabling people to live and work closer to transport options, amenities, and services will support reduction in greenhouse gas emissions, particularly compared to Option 1. | greenhouse gas emissions; however this is not expected to be inherently different from what would otherwise arise from Options 2 and 3. |

## Analysis

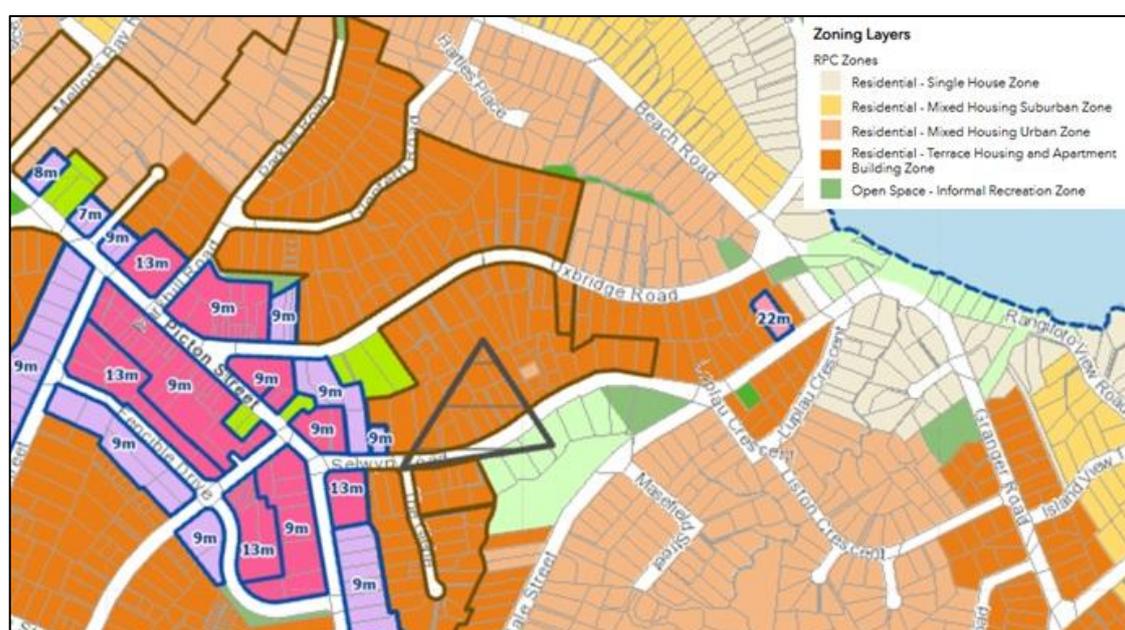
58. In implementing Policy 3 of the NPS-UD, Option 4 would have some of the greatest benefits in terms of enabling development capacity as directed. However, this option would generate considerable cost associated with the loss of all four local public views and the values that they seek to manage. As such, this option is not considered to be particularly well balanced when considering the policy direction within Chapters B4 and D16 of the AUP and would be inconsistent with the ‘well functioning urban environment’ envisaged by the NPS-UD.
59. All of Options 1 through 3 would provide for the retention of the Queens Road and Pilkington Road, Panmure Basin viewshafts as qualifying matters. In particular, it is considered that these viewshafts will not have a discernible impact on development capacity and provide for greater benefits than they do costs, based on the assessment completed and recommendations made in the Landscape Assessment. Retaining these two viewshafts as qualifying matters provides for a balanced approach, when considering the policy direction set out in the NPS-UD and within Chapters B4 and D16 of the AUP.
60. In terms of Options 1 through 3, the primary point of difference between these options is the response to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts. Analysis of these options as they pertain to each of these two viewshafts is discussed in more detail below:

### Selwyn Road / the Glebe Intersection

- Option 1 (retaining and extending the viewshaft as a qualifying matter) would have a reasonably significant impact on plan enabled development capacity at a local level relative to what would otherwise be enabled by the uninhibited application of Policy 3(D) of the NPS-UD. Noting the assessment in the Landscape Assessment, it is considered that the costs of retaining and extending the viewshaft would outweigh the benefits, given that there are other similar public views managed by the AUP in the immediate vicinity which are more strongly aligned with policy direction in Chapters B4 and D16.
- In the event that the viewshaft were extended in full to the coast (Option 1), there is also a potential scope issue in that this would remove or reduce development potential

relative to what is currently enabled under the Operative AUP on some sites, particularly those between Beach Road and Marine Parade. As such, it is considered that Option 1 as it pertains to the Selwyn Road / the Glebe Intersection viewshaft is out of scope of PC120.

- Whilst the costs of imposing Option 2 (retaining the viewshaft as currently mapped as a qualifying matter) would be limited, it is considered there would be little to no benefit in doing so. In particular, and as noted in the Landscape Assessment, retention of the viewshaft as currently mapped in the AUP would manage views up until the mapped 'end limit' however development of up to 22m (based on the current proposed extent of the modified THAB zone) could occur immediately beyond this, which would largely obscure the views seeking to be managed by the viewshaft from the viewing point. Refer to **Figure 1** below.



**Figure 1.** Selwyn Road / the Glebe Intersection viewshaft, PC120 zoning

- It is considered that while Option 3 (delete the viewshaft as a qualifying matter) would have some costs in terms of lost connection with the local landscape from this particular viewpoint, this would be moderated by the presence of similar public views in the immediate area (i.e. the Stockade Hill Viewshaft). As noted in the Landscape Assessment, 'the view actually increases briefly as one travels down Selwyn Road<sup>4</sup>,' such that similar views would also continue to be available to those travelling down Selwyn Road from Howick Town Centre as a result of the topography, presence and orientation of Selwyn Road and Nixon Park relative to the coast.
- Given the above, it is considered that Option 3 most appropriately balances the costs and benefits in relation to the Selwyn Road / the Glebe Intersection viewshaft.

<sup>4</sup> Proposed Plan Change 120 Landscape Assessment – Local Public Views, Stockade Hill Viewshaft, and AWMM Viewshaft Overlays, prepared by Melean Absolum Ltd, at Table 4.

### St Johns Redoubt, Redoubt Road

- Option 1 (narrowing and extending the viewshaft to the end limit recommended in the Landscape Assessment) would have a reasonably significant impact on plan enabled development capacity at a local level relative to what would otherwise be enabled by the uninhibited application of Policy 3(C) of the NPS-UD. In particular, this would extend over and reduce heights within notable portions of the walkable catchment around the Manukau Business – Metropolitan Centre Zone.
  - In addition, and based on geospatial analysis completed to date, Option 1 would in some cases remove or reduce development potential relative to what is currently enabled under the Operative AUP. As such, it is considered that Option 1 as it pertains to the St Johns Redoubt, Redoubt Road Viewshaft is out of scope of PC120.
  - Considering the above, the remaining options in regards to the St Johns Redoubt, Redoubt Road Viewshaft are to: (a) Option 2 - retain the viewshaft as currently mapped in the AUP as a qualifying matter, noting that extension of the viewshaft is best addressed through a separate plan change or through review of the AUP at a later stage, or (b) Option 3 - delete the viewshaft as a qualifying matter.
  - Whilst the Landscape Assessment indicates that the viewshaft (a) has been compromised and (b) is flawed as currently mapped in the Operative AUP, it is considered that Option 2 would impose only minor social, economic, and environmental costs (including costs to development capacity), and would continue to manage the viewshaft values to a degree. In particular, the Landscape Assessment notes that there are elements of the view that remain valuable within the context of the criteria within Chapter D16, and warrant continued management. There are also no other local public views which offer similar views containing similar values to the St Johns Redoubt, Redoubt Road viewshaft.
  - With respect to Option 3, and having regard to the Landscape Assessment and the policy direction within Chapter B4 of the RPS and the NPS-UD, it is not considered that deletion of the viewshaft is currently warranted or necessary.
  - In relation to the St Johns Redoubt, Redoubt Road Viewshaft, it is considered that Option 2 most strongly aligns with policy direction, whilst balancing the costs and benefits of the viewshaft and the need to intensify.
61. Overall, it is considered that Options 2 and 3 are more consistent with both the policy direction set out in the NPS-UD as well as that within Chapters B4 and D16 of the AUP. As a result, the preferred option takes elements of both Options 2 and 3, as follows:
- **Selwyn Road / The Glebe intersection viewshaft** – remove as a qualifying matter.
  - **St Johns Redoubt, Redoubt Road viewshaft** – retain as a qualifying matter in its current form, recognising that the preferred extension from an expert landscape perspective is out of scope of PC120.
  - **Queens Road, Panmure Basin viewshaft** – retain as a qualifying matter in its current form.
  - **Pilkington Road, Panmure Basin viewshaft** – retain as a qualifying matter in its current form.

62. It is acknowledged that with respect to the Selwyn Road / the Glebe Intersection viewshaft, the recommendation to remove the viewshaft as a qualifying matter differs from what had been previously recommended through notification of Plan Change 78. This reflects that the zoning proposed below and beyond the mapped 'end limit' of the viewshaft has changed from Plan Change 78 to PC120, which in turn (a) would if retained, necessitate significant extension to the viewshaft to account for and reduce heights enabled by the underlying zone, and (b) increases the costs of retaining the viewshaft as a qualifying matter.
63. For the reasons set out above, the preferred option as outlined in paragraph 61 above is considered to strike an appropriate balance when weighing the costs and benefits of the values of the viewshafts relative to the need to intensify, having regard to the relevant policy direction.

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

64. 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.
65. In this instance, the viewshafts and their methods are well understood. However, there is a level of uncertainty and/or incomplete information associated with the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road Viewshafts, which presents some risk as discussed below:

#### Selwyn Road / The Glebe Intersection

- The uncertainty in relation to the Selwyn Road / the Glebe Intersection viewshaft primarily stems from the inability to carry out meaningful engagement with the community and Mana Whenua prior to notification, given time constraints to notify. This poses more of a risk given the recommendation to remove as a qualifying matter.
- The criteria for identification of a local public view within Chapter D16 includes (Policy D16.3.(1)(b)) '*the community association with, or public appreciation of, the values of the viewshaft.*' The viewshaft was originally identified and scheduled under the legacy Manukau City District Plan in the 1990s with support from the community. The latest recorded information regarding public appreciation of the values of the viewshaft is available as a result of submissions and further submissions on Plan Change 78. Notably, a number of submitters sought deletion of the LPVO as a qualifying matter in its entirety, which in turn generated a large number of further submissions opposing these points. Whilst this provides a degree of context regarding the importance of the LPVO to the public generally, it does not provide any level of granularity as to the public appreciation of this *particular viewshaft* so as to be informative.
- In addition, the identification and evaluation (and conversely, their deletion) of locally and regionally significant views must consider a number of factors, including whether 'the view recognises the importance of the landscape to Mana Whenua' (RPS Policy B4.3.2.5.(d)). Review of prior documentation regarding the scheduling and reconfirmation of the viewshaft does not indicate that Mana Whenua have a particular association with this view, as originating from the scheduled viewpoint within the intersection of Selwyn Road / the Glebe. There is however no ability to confirm this

conclusively without having engaged directly with Mana Whenua regarding this viewshaft.

- Despite the above uncertainties, risks associated with the preferred option to delete the viewshaft are generally moderated by the fact that: (a) there remain similar alternative public views, both managed by the AUP (Stockade Hill Viewshaft) and unmanaged (travelling down Selwyn Road), which provide opportunity for appreciation of the local landscape and connection with the coast, and (b) notification will enable appropriate opportunities for submissions to be made and considered through the plan change, providing further indication as to the associations held with the viewshaft.
- Whilst prior engagement would provide context to inform any recommendation for notification, the plan change process provides for a reasonable pathway to further gauge interest in, and association with, the viewshaft. Submissions and further submissions can be made, which will be considered and evaluated in further refining this s32 evaluation report.

#### St Johns Redoubt, Redoubt Road

- The uncertainty as it pertains to the St Johns Redoubt, Redoubt Road viewshaft arises as a result of scope issues through PC120 that prevent extension of the viewshaft to the end limit recommended in the Landscape Assessment. In particular, the current viewshaft as mapped in the AUP does not capture the full extent of the view, meaning that development could occur beyond the mapped 'end limit' which compromises the values of the viewshaft; this could be exacerbated as a result of increased building heights enabled through PC120 beyond the mapped 'end limit' of the viewshaft.
- At this stage, there is insufficient evidence to warrant extending the viewshaft to a point between the current mapped end limit and the end limit recommended in the Landscape Assessment. Without that evidence, the costs of doing so cannot be justified in light of the direction to intensify as required by Policy 3(c) of the NPS-UD.

66. The risks of acting and not acting in relation to the LPVO qualifying matter have been appropriately considered through the evaluation of options. Overall, the LPVO remains an important local control and contributes to a well-functioning urban environment that provides for social well-being and achieves environmental outcomes.

67. The preferred option manages the risks of acting and not acting, including in relation to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road viewshafts. It also provides for environmental outcomes whilst ensuring the AUP is consistent with both Objectives 1 and 2 of the NPS-UD.

#### **Effectiveness and efficiency**

68. The objective of the plan change is to implement clause 4(1)(b) of Schedule 3C of the RMA and Policy 3 of the NPS-UD. The primary objective of the LPVO is to provide for the maintenance and enhancement of the visual integrity of significant local public views.

69. Options 1 through 3 are equally efficient and effective at managing the values of the Queens Road and Pilkington Road viewshafts whilst minimising effects on development capacity required by Policy 3. Option 4 would be efficient in providing for development capacity, it

would likely result in erosion of the values of all four views over time, and as a result is not considered to be effective.

70. With respect to the Selwyn Road / the Glebe Intersection and St Johns Redoubt, Redoubt Road viewshafts, Option 1 would necessitate extension over a significant distance, thereby constraining development over a relatively large area and reducing overall efficiency of the viewshafts. As has been noted, these viewshafts as mapped in the Operative AUP are not an overly effective means of managing their views, and neither is retention of the viewshafts in their current form (Option 2).
71. The Landscape Assessment notes that there are elements of the St Johns Redoubt, Redoubt Road viewshaft that remain valuable within the context of the criteria within Chapter D16, and warrant continued management; as such, Option 3 would not be effective at managing the values of this viewshaft.
72. It is considered that the preferred option (taking elements of both of Options 2 and 3 as set out in paragraph 61 above) is the most efficient and effective at achieving both the objectives of the plan change and providing for the maintenance and enhancement of significant local public views, where warranted. It is acknowledged that retaining the St Johns Redoubt, Redoubt Road viewshaft in its current form presents potential issues from an efficacy perspective however this is considered to be the most appropriate response at this time for the reasons set out above.
73. Whilst other options may be efficient and/or effective at achieving certain objectives of either the plan change or the LPVO, they are not efficient and effective at balancing the two.

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

74. It is proposed that the LPVO is retained as a qualifying matter in relation to the Pilkingtons Road and Queens Road, Panmure Basin viewshafts, as well as the St Johns Redoubt, Redoubt Road viewshaft. It is proposed to remove the Selwyn Road / the Glebe viewshaft as a qualifying matter.
75. With respect to the three local public views to be identified as qualifying matters, it is proposed that the LPVO provisions within Chapter D16 and Schedule 11 are retained in their current form. In addition, it is proposed that the LPVO maps are retained with respect to these three local public views to be identified as qualifying matters.

### **Overall conclusion**

76. It is proposed that the LPVO is identified as a qualifying matter in relation to the Pilkingtons Road and Queens Road, Panmure Basin viewshafts and the St Johns Redoubt, Redoubt Road viewshaft under Clause 8(1) of Schedule 3C of the RMA, which includes 'any other matter that makes higher density, as specified by clause 4(1)(b) or policy 3, inappropriate in an area, but only if subclause (4) is satisfied.'
77. An evaluation has been carried out in relation to a number of options identified as possible means of achieving the purpose of the RMA, which was informed by site-specific assessment carried out by an appropriate expert, which determined that the local benefits

associated with retaining the controls pertinent to these three local public views outweigh the cost to development capacity in areas where the qualifying matter applies.

78. It is considered that the approach proposed strikes an appropriate balance between the costs and benefits, and is the most effective and efficient means of providing for the management of LPVO values whilst enabling development capacity.

## Appendices

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

## Information Used

1. The following reports, documents, evidence, and plan versions were used to help the development of the plan change and assess Chapter D16 Local Public views 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 D16 Local Public Views provisions reviewed and considered in assessment of views and restrictions on development. AUP maps and Schedule 11 identify locations of the viewshafts. |
| Statement of Evidence Trevor Stewart Mackie on behalf of Auckland Council (Planning) – Topic 020 Viewshaft – Local Public Views  | Considered in the development of the s32 report.  |
| Statement of Primary Evidence of Melean Jill Absolum on behalf of Auckland Council, Landscape Evidence on Ridgeline Protection, Local Public Views, Auckland War Memorial Museum Viewshaft | Considered in the development of the s32 report.  |
| PC78 Submissions and Further Submissions on Topic 010H Qualifying Matters – (Other) Local Public Views   | Considered in the development of the s32 report   |
| Primary Statement of Evidence of Todd Oliver Elder on behalf of Auckland Council, Planning - Topic 010H Qualifying Matters (Other) – Local Public Views                                    | Considered in the development of the s32 report.  |
| Statement of Primary Evidence of Melean Jill Absolum on behalf of Auckland Council, Landscape – Topic 010H – Local Public Views Overlay  | Considered in the development of the s32 report.  |

## **Consultation Summary**

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

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

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

MĀORI ENGAGEMENT CONSULTATION SUMMARY REPORT

**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.

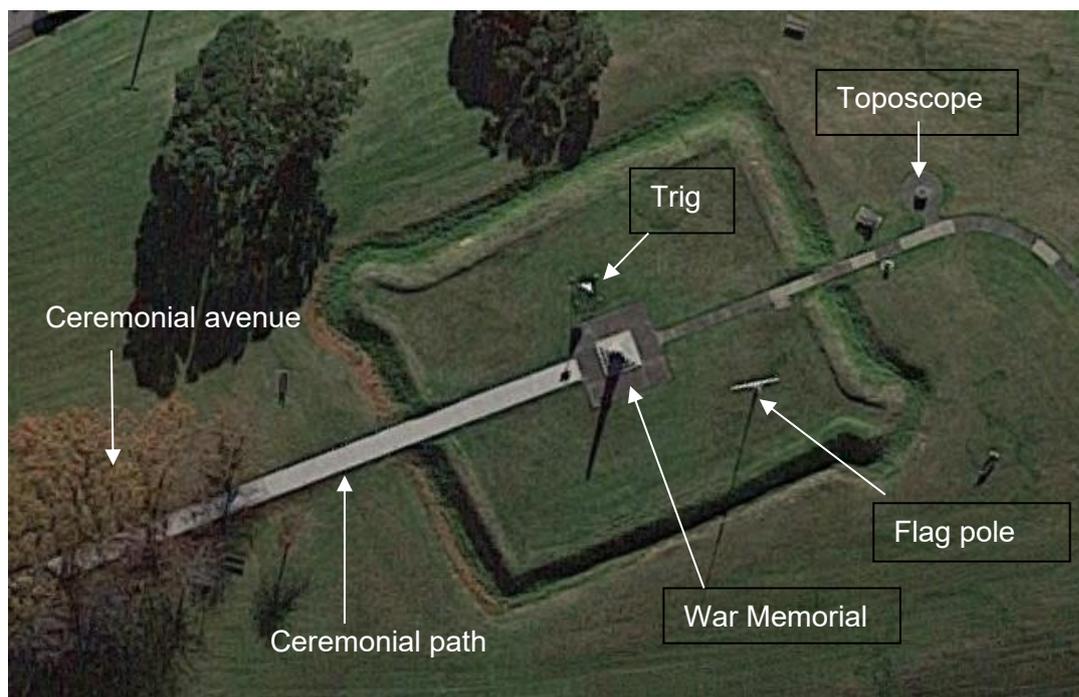
## 4 STOCKADE HILL VIEWSHAFT

### 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*).

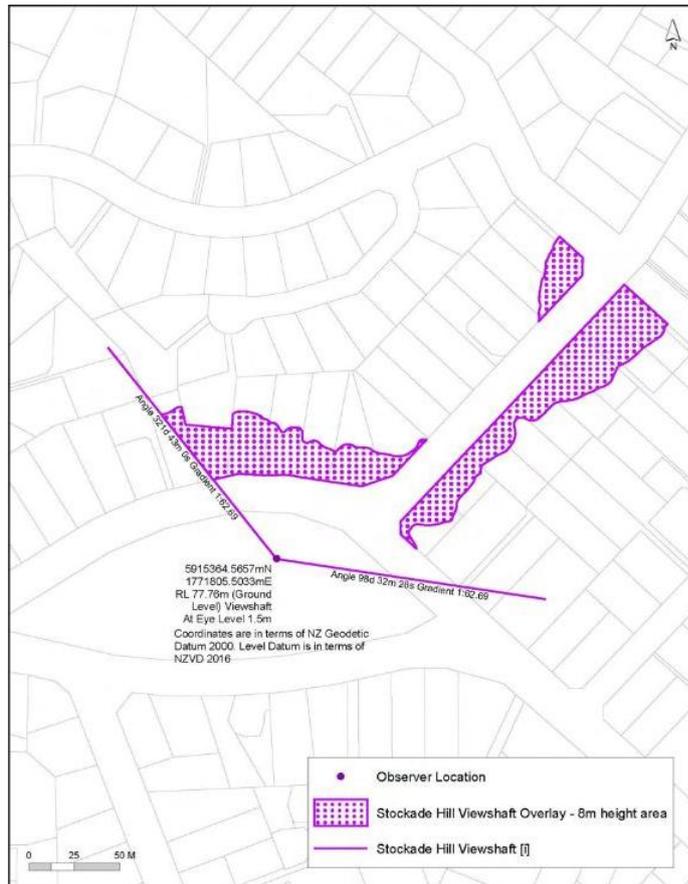
Outside the embankment on the eastern side is a toposcope, beside which is the origin of the viewshaft. These features can all be seen in the aerial photograph in **Photograph 2**, below.



**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.

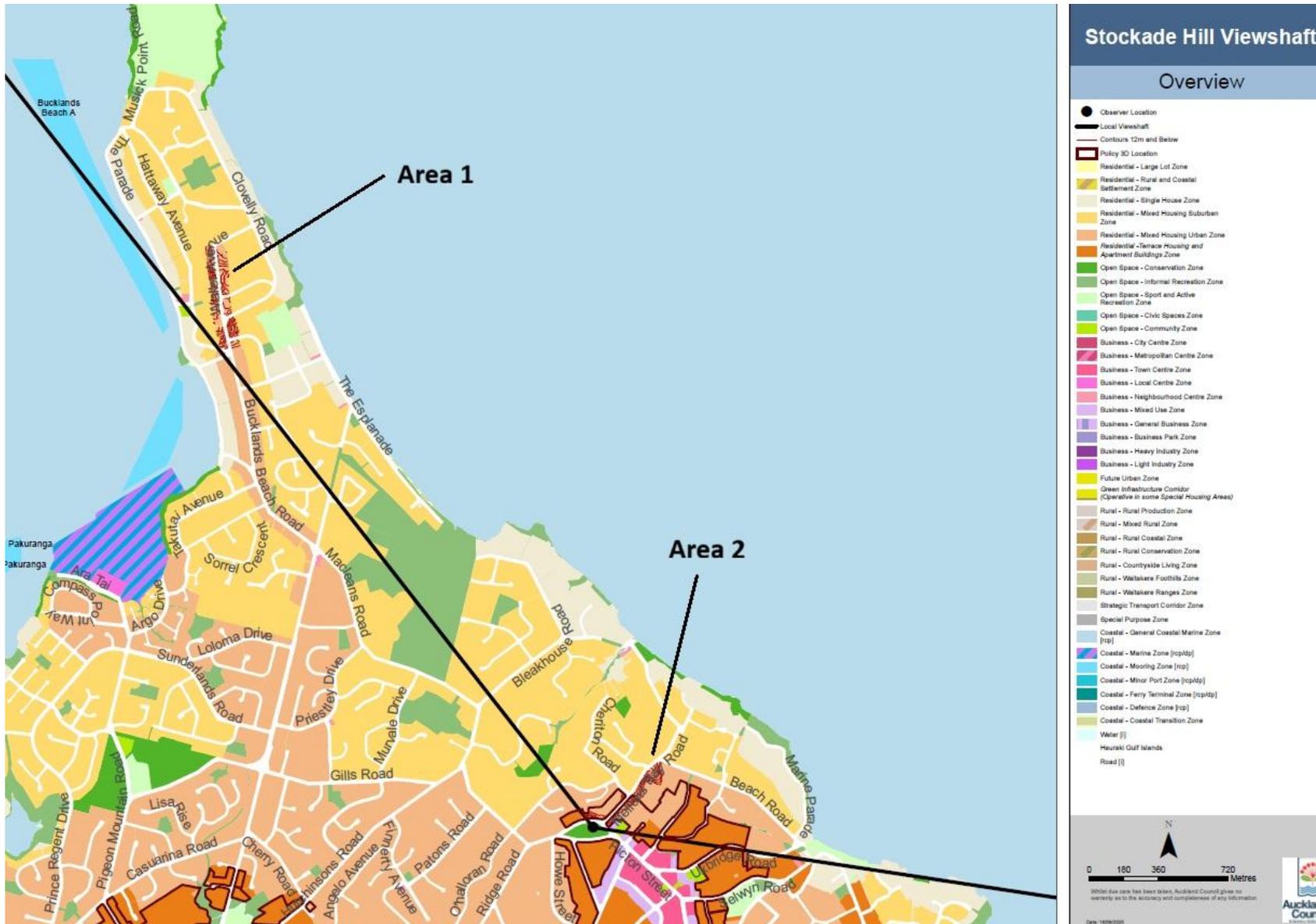
### 4.4 EFFECTS OF POLICY 3(d) NPS-UD

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:

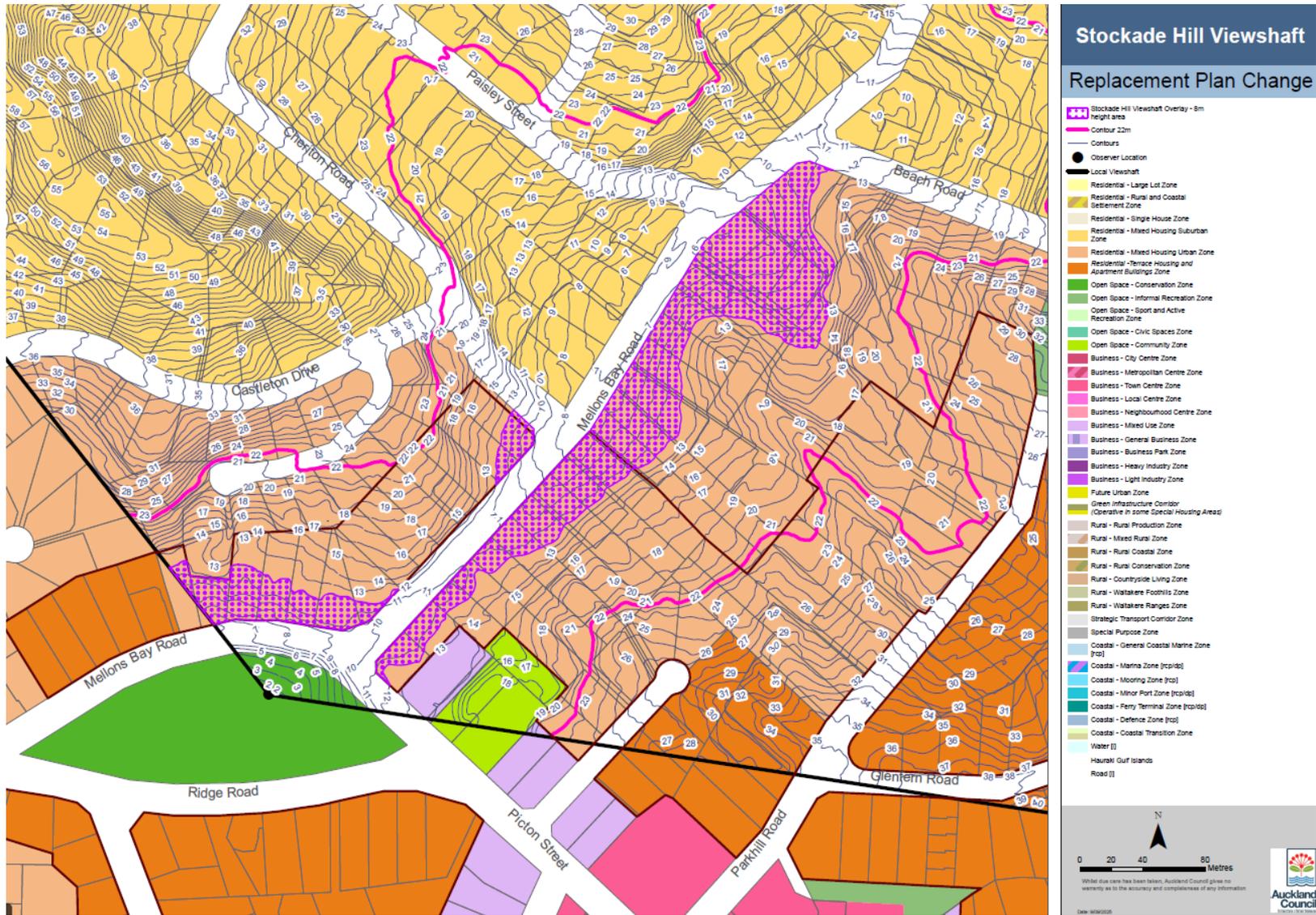
- the area concerned only covers potential building sites<sup>2</sup> on two properties, a small area within the breadth of this viewshaft overlay;
- reducing the potential height for development below what is currently enabled in the AUP would be unacceptable; and
- adding an additional height control area would make the AUP provisions unnecessarily complicated.

## RECOMMENDATIONS

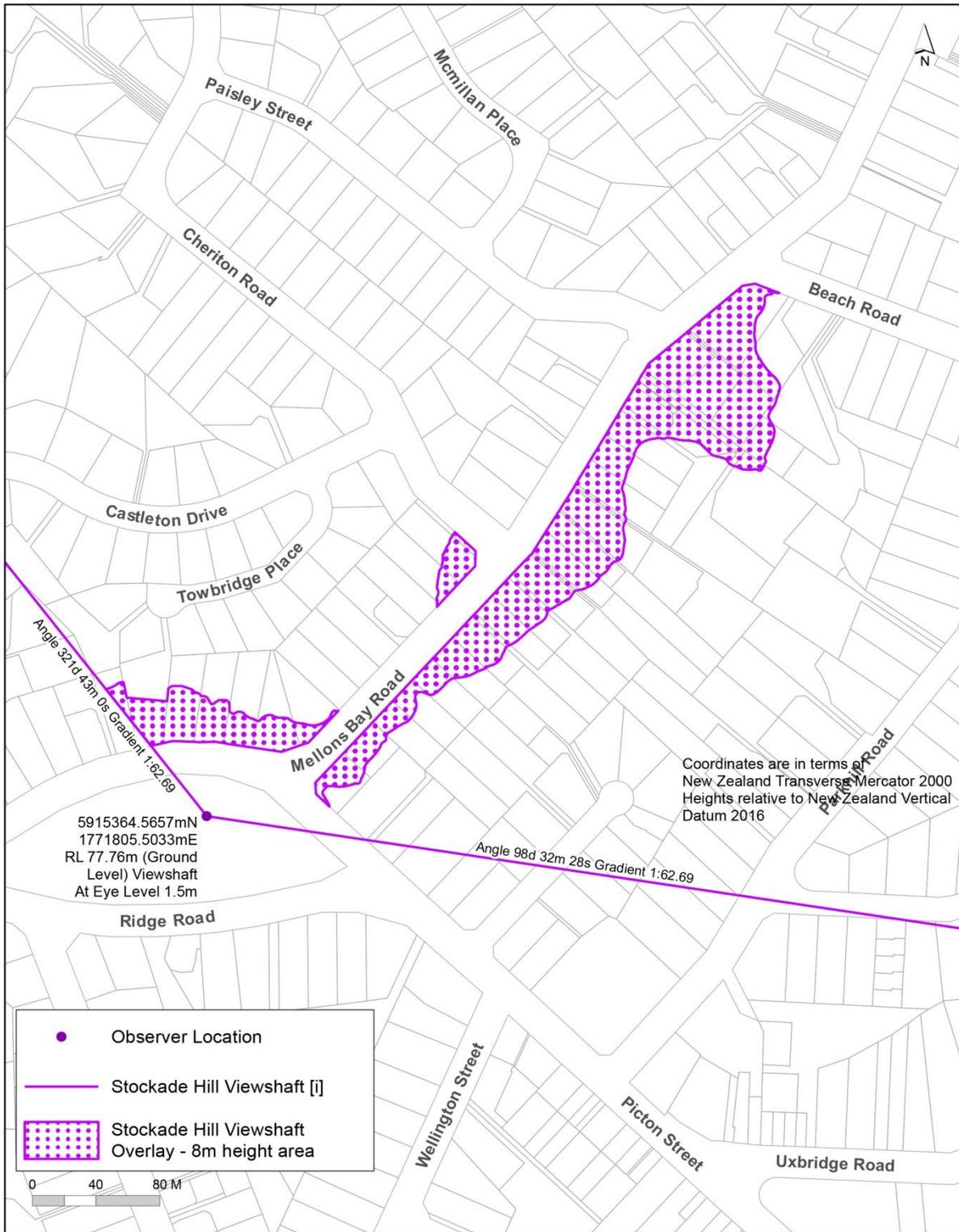
In my opinion the Stockade Hill Viewshaft is worthy of identification as a QM under PC120, together with the restrictions to the extent of the THAB zone and the extension of the 8m height control areas where the proposed MHU zoning would enable development through the floor of the viewshaft, as discussed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

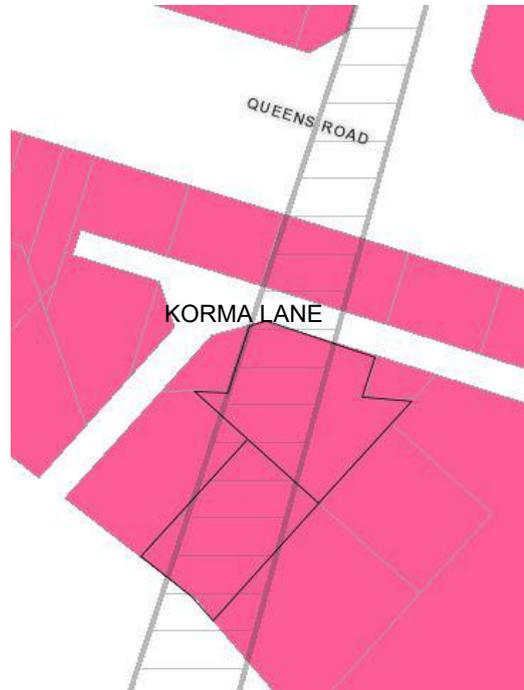
The implications of this are discussed in more detail in the individual viewshaft discussion below.

## 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.

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

**Table 2** Pilkington Road viewpoint assessment against Policy D16.3.1

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

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

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



**Photograph 4** The Queens Road viewshaft

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

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

|          |  |   |
|----------|--|---|
| <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.

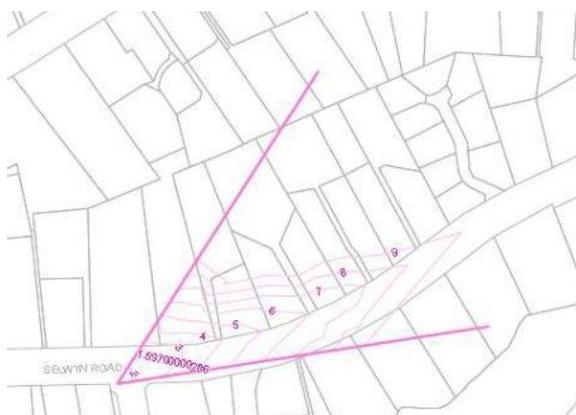
### 5.3 SELWYN ROAD / THE GLEBE, HOWICK

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)

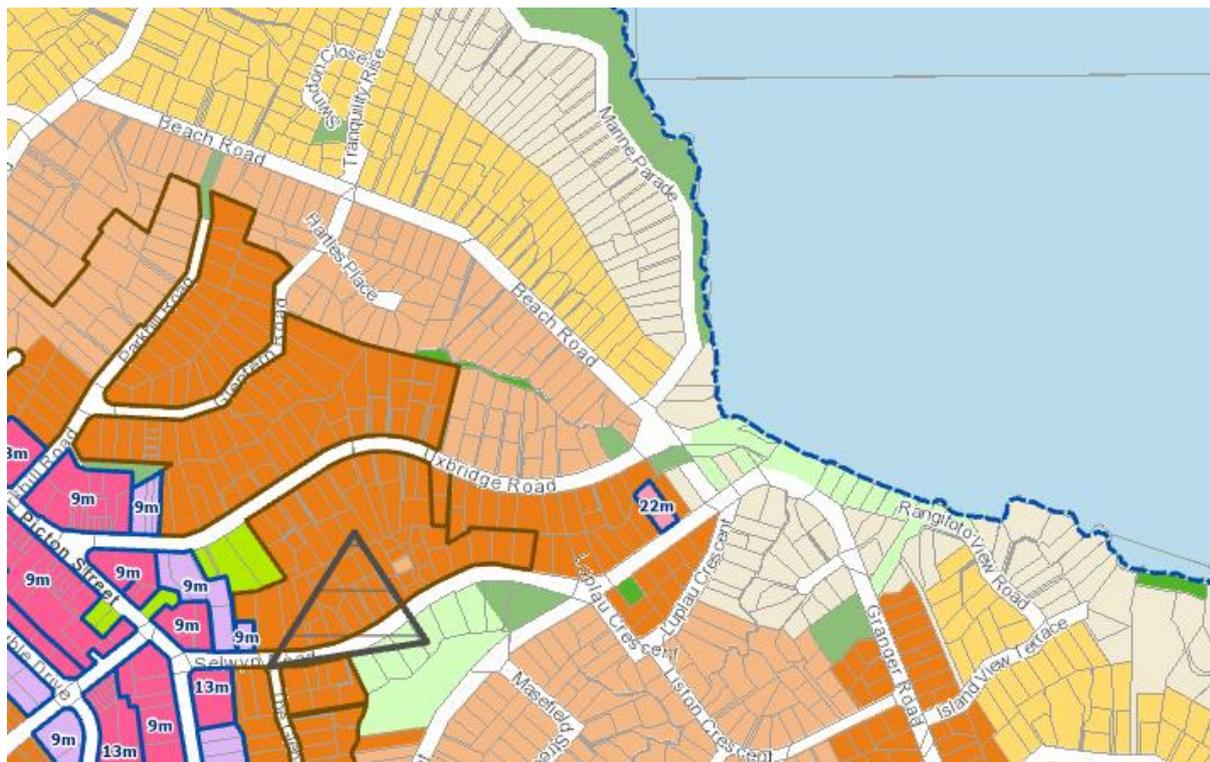
As can be seen in **Figure 10**, above left, the viewshaft, as currently illustrated in Schedule 11 of the AUP, is a triangle extending approximately 180m from the origin point. It covers an area of properties all zoned R-SH, with the Nixon Park / Howick Bowling Club land on the southern

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.

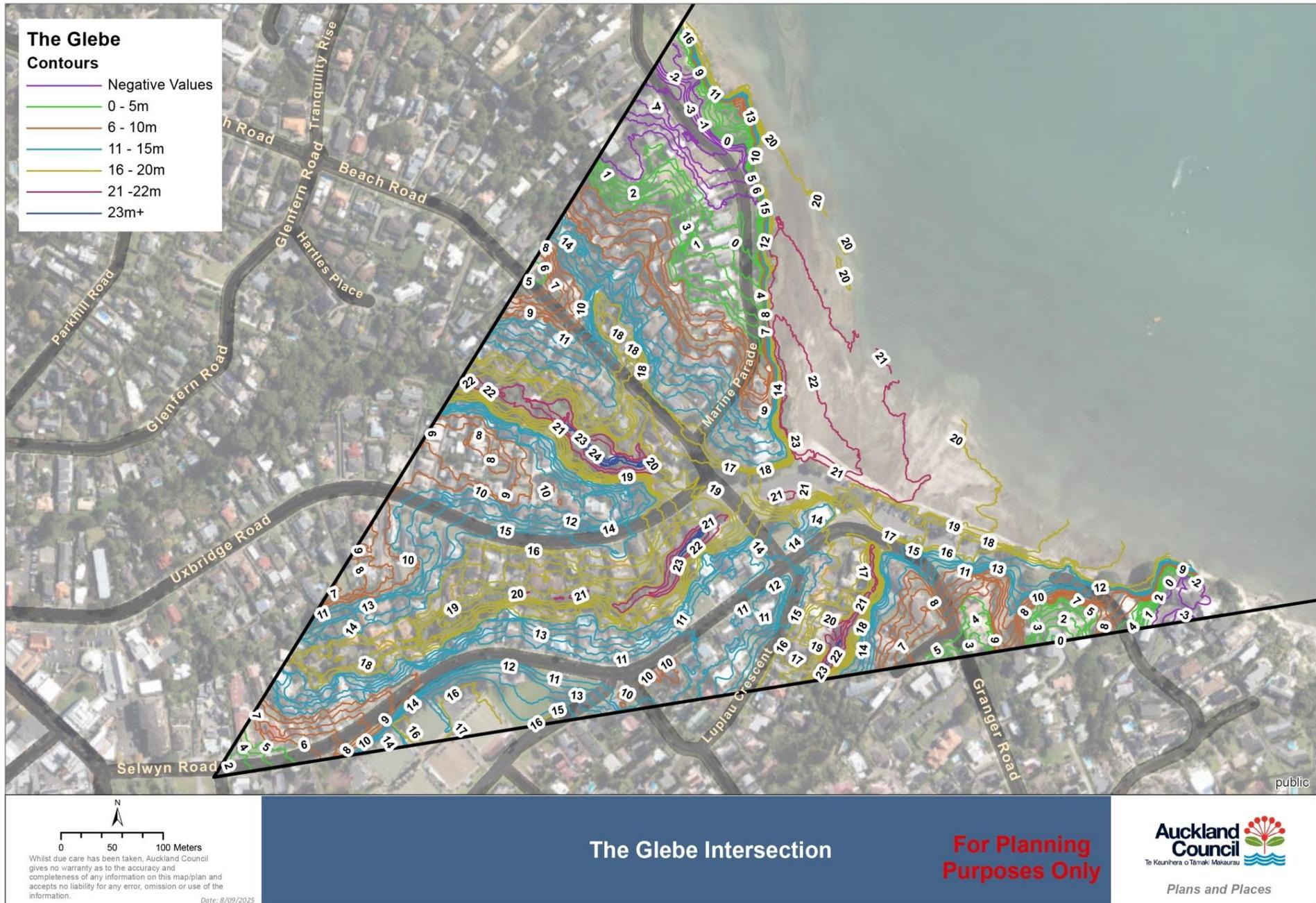
**Figure 11** below, is an excerpt from the PPC120 map showing the proposed zoning in the viewshaft and down the valley below.



**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.

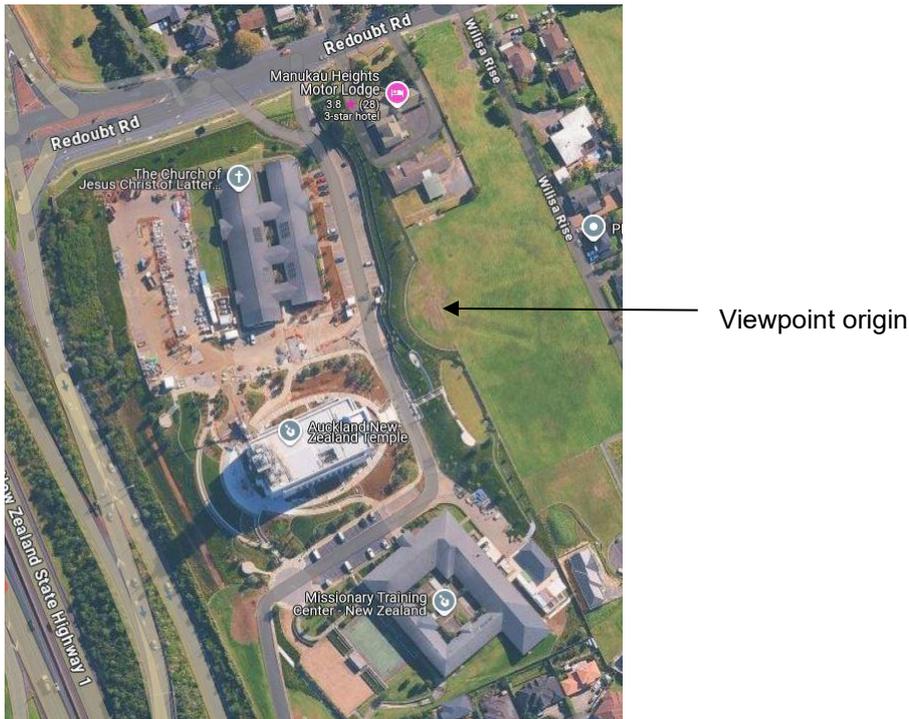
On the other hand, to appreciate that view one has to walk from the adjoining road, either up the steep eastern side of Stockade Hill, or the gentler western side. The Selwyn Road / The Glebe viewshaft is readily available to pedestrians, motorists, bus passengers and cyclists moving downhill from the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

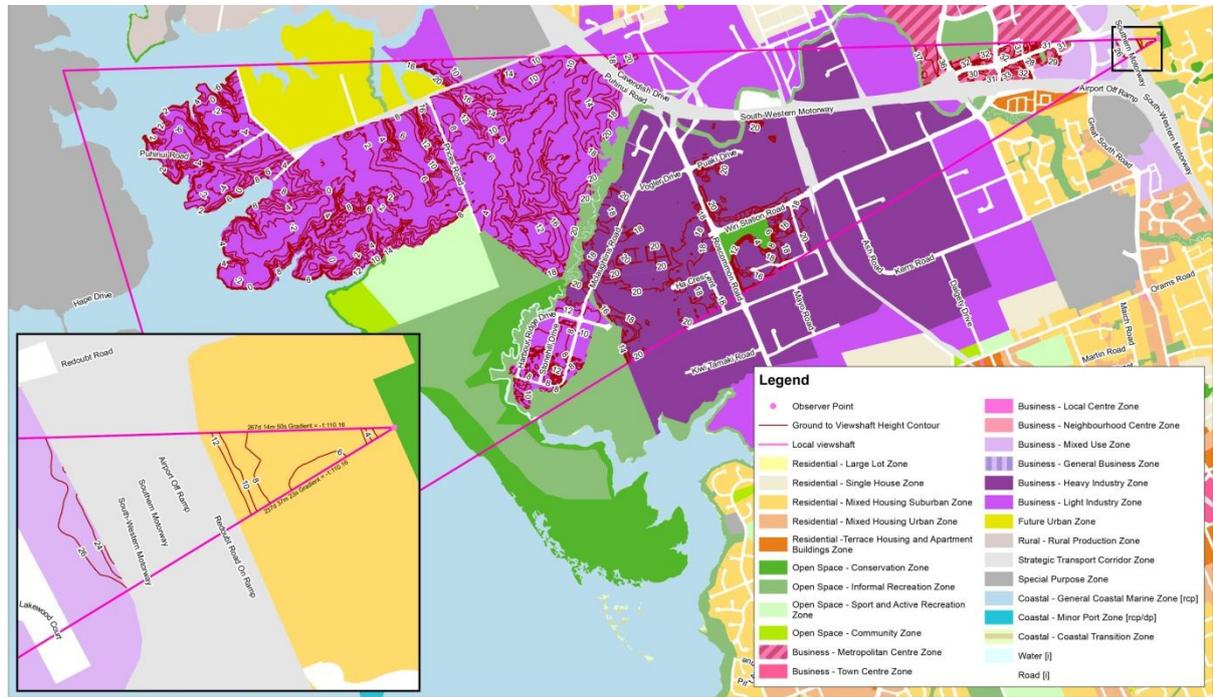


**Figure 13** The St John's Redoubt LPVO in Schedule 11 (left) and the AUP Geomaps (right)

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.

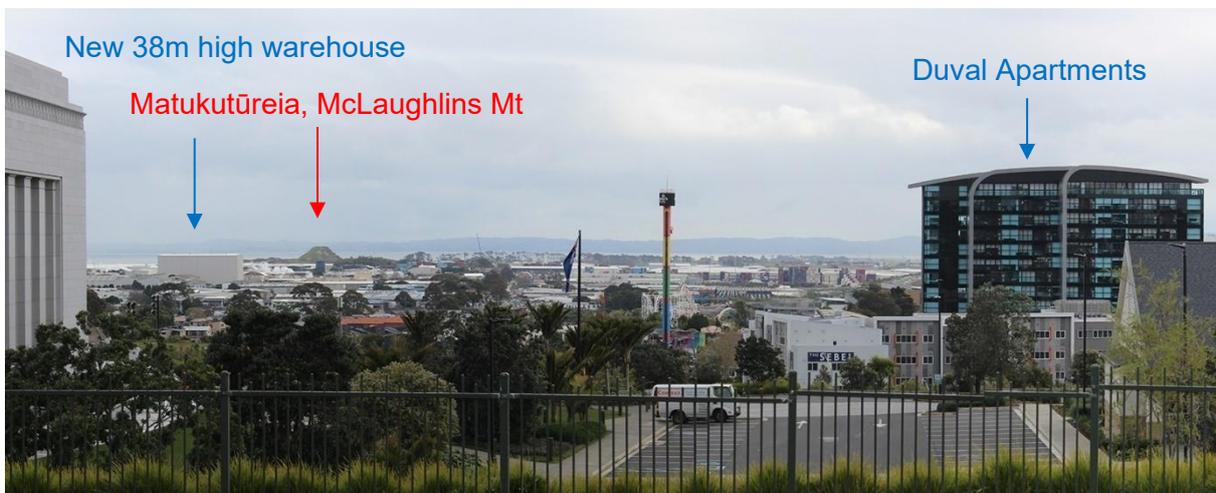
In my opinion there is little point in retaining the viewshaft at the width shown in **Figure 13**, as the view has already been curtailed by the Duval Apartment building. Additionally, as is clear in **Figure 14**, the viewshaft crosses areas of Metropolitan Centre zone at Manukau, where heights up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

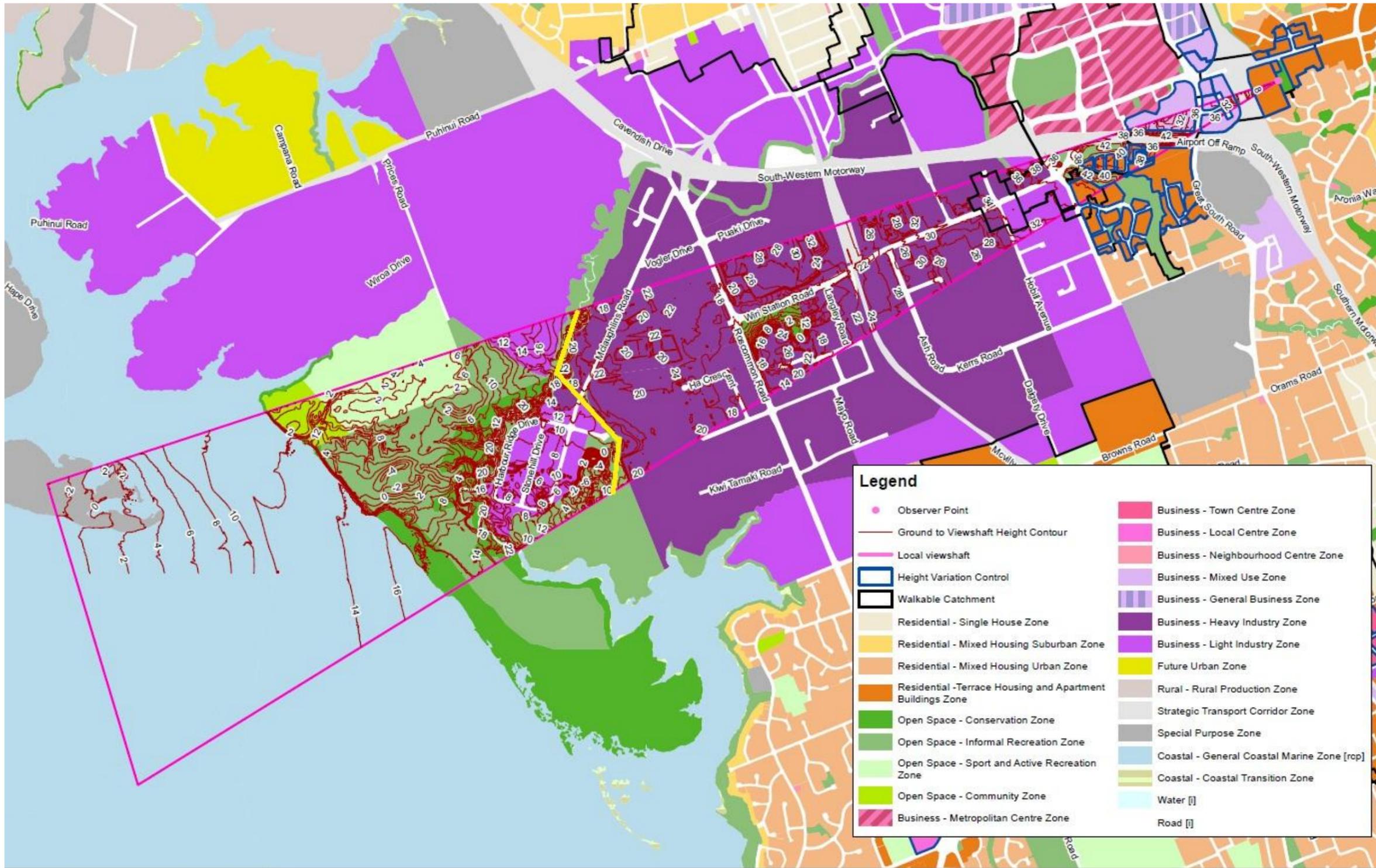
**Table 5** St Johns Redoubt viewshaft assessment against Policy D16.3.1

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



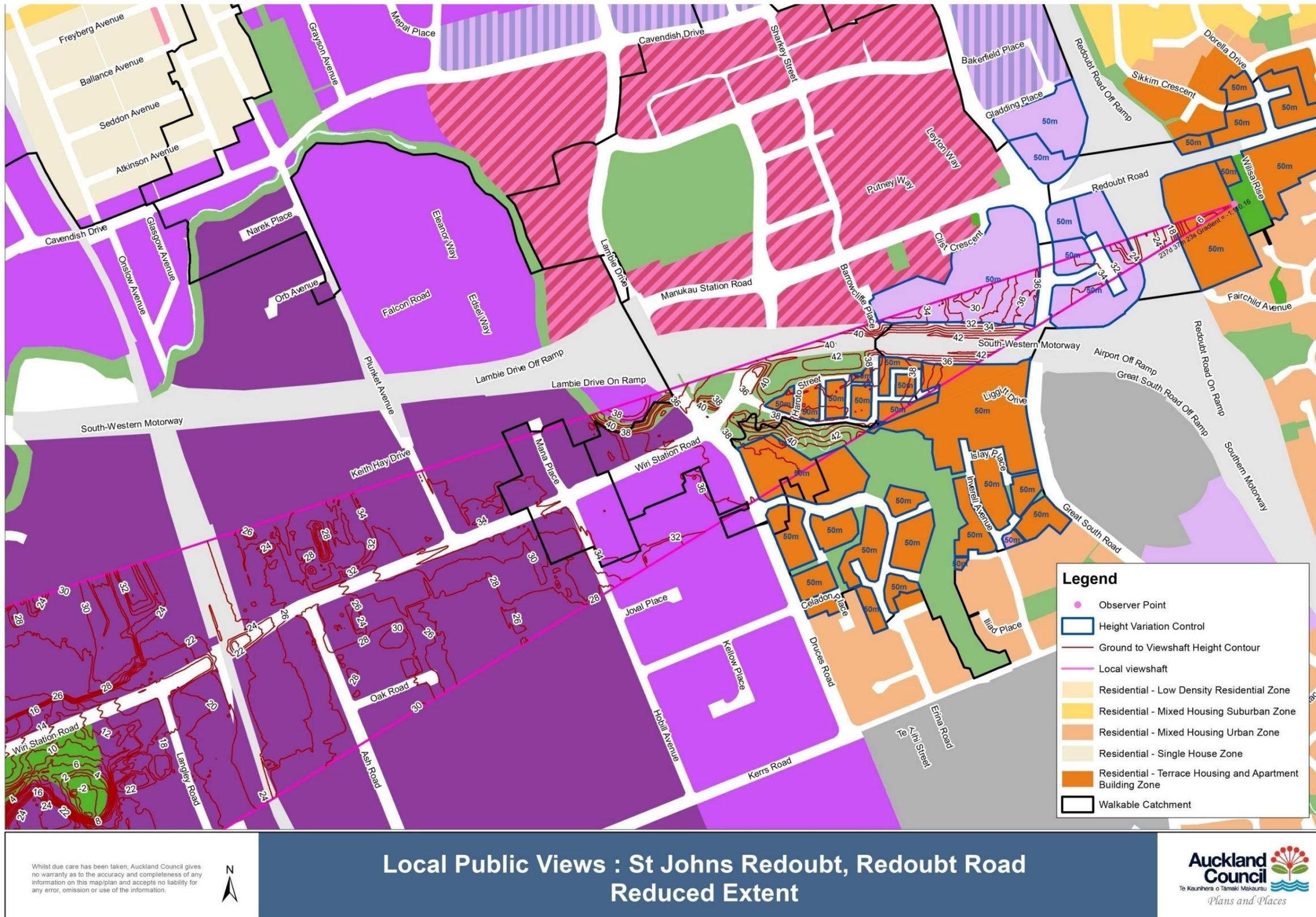
**Local Public Views : St Johns Redoubt, Redoubt Road  
Reduced Extent**



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

**APPENDIX 2. List of Sites Impacted by LPVO (preferred option)**

| <b>List of Sites Impacted by LPVO (preferred option)</b> |                          |  |                    |
|--|--------------------------|--|--------------------|
| <b>Local Public View</b>                                 | <b>Address</b>           | <b>Operative AUP Zone</b>                | <b>Section RMA</b> |
| St Johns Redoubt, Redoubt Road (Map 11.5)                | 19 Redoubt Road, Manukau | Residential – Mixed Housing Suburban     | S771(j)            |
| Queens Road, Panmure Basin (Map 11.6)                    | 29 Lagoon Drive, Panmure | Open Space – Sport and Active Recreation | S770(j)            |
| Pilkington Road, Panmure Basin (Map 11.7)                | 77 Queens Road, Panmure  | Business – Town Centre                   | S770(j)            |
|  | 3 Korma Lane, Panmure    | Business – Town Centre                   | S770(j)            |
|  | 26 Lagoon Drive, Panmure | Business – Town Centre                   | S770(j)            |
|  | 28 Lagoon Drive, Panmure | Business – Town Centre                   | S770(j)            |
|  | 30 Lagoon Drive, Panmure | Business – Town Centre                   | S770(j)            |
|  | 29 Lagoon Drive, Panmure | Open Space – Sport and Active Recreation | S770(j)            |