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

FOR AUCKLAND COUNCIL

Brown NZ Ltd
June 2022

Introduction

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

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

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

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

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

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

Matters of National Importance:

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

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

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

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

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

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

1. Auckland City's Connections With the Waitemata Harbour

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

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

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

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

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

1.1 Current Views To & Connectivity With The Waitemata Harbour

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

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

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

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

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

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

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

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

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

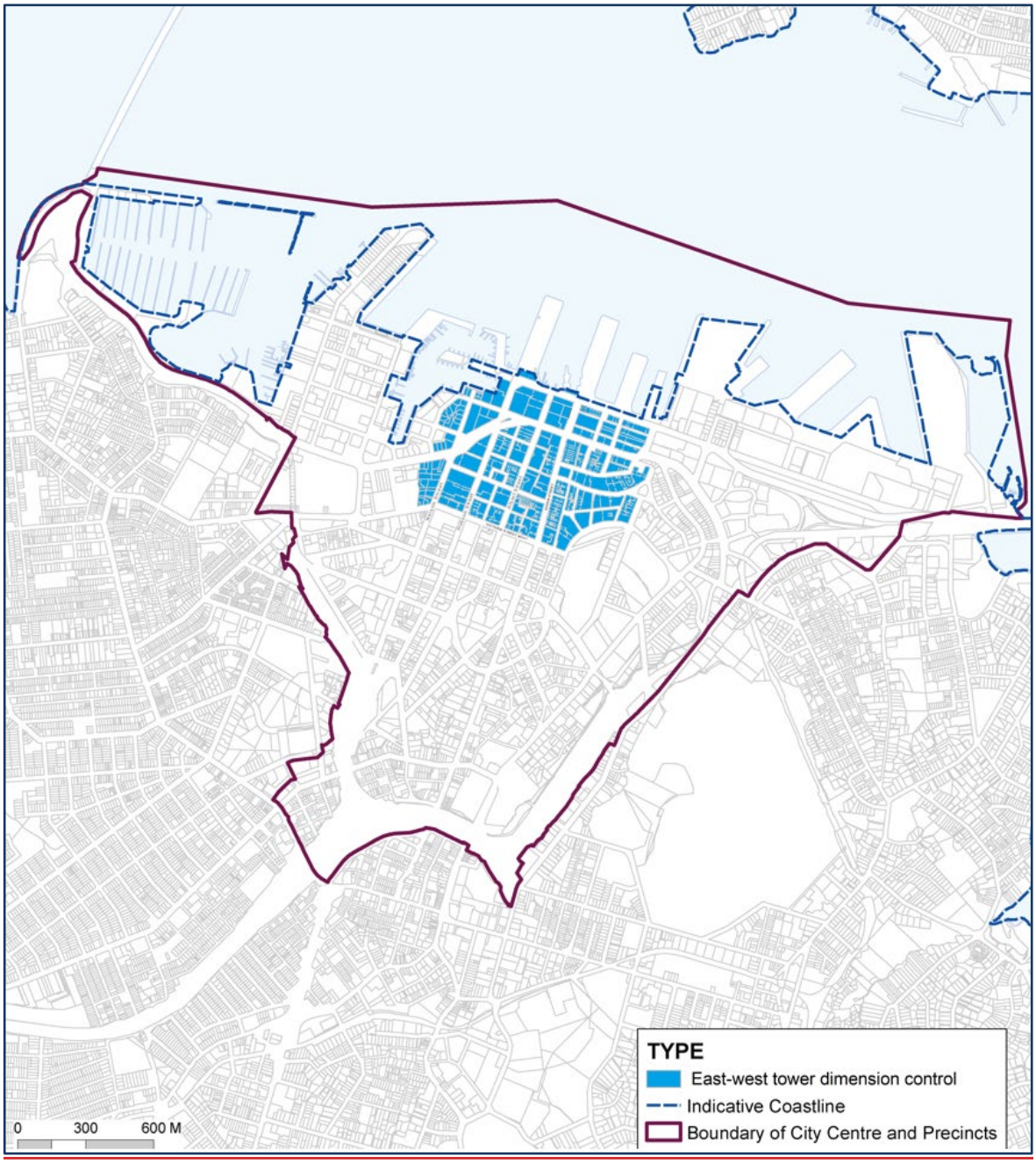
To summarise, therefore:

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

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

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

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



1.2 The Definition Of Existing Harbour 'Viewshafts'

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

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

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

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

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

1.3 Private Views & Connection

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

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

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

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

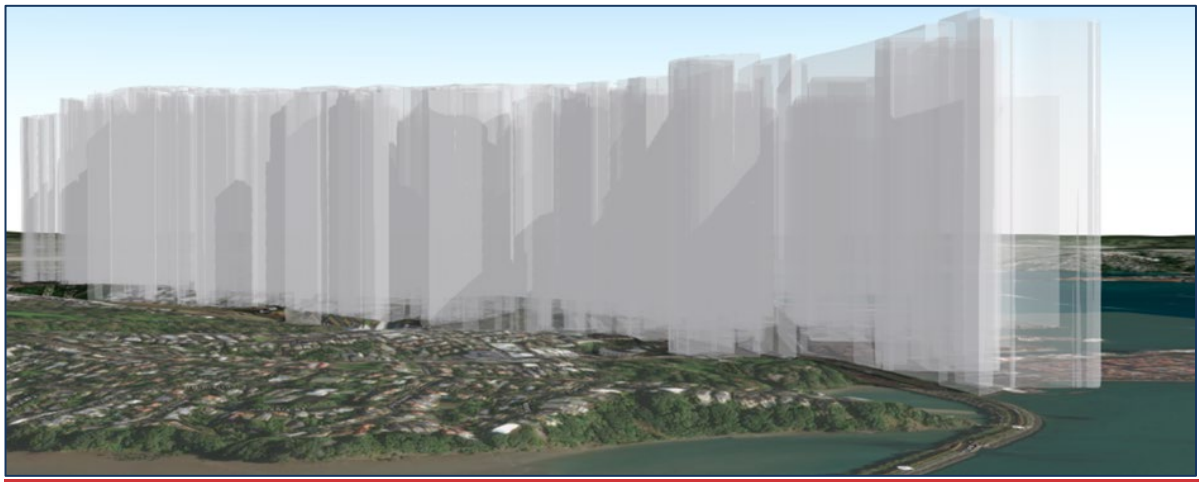
This pattern of development contrasts other recent developments, ranging from the four separate, but linked, commercial buildings of 10-16 Viaduct Harbour Avenue to the Dockside Lane complex near Quay and Tapora Streets, the 57-storey high, Pacifica building on Commerce Street – within its narrow north-south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

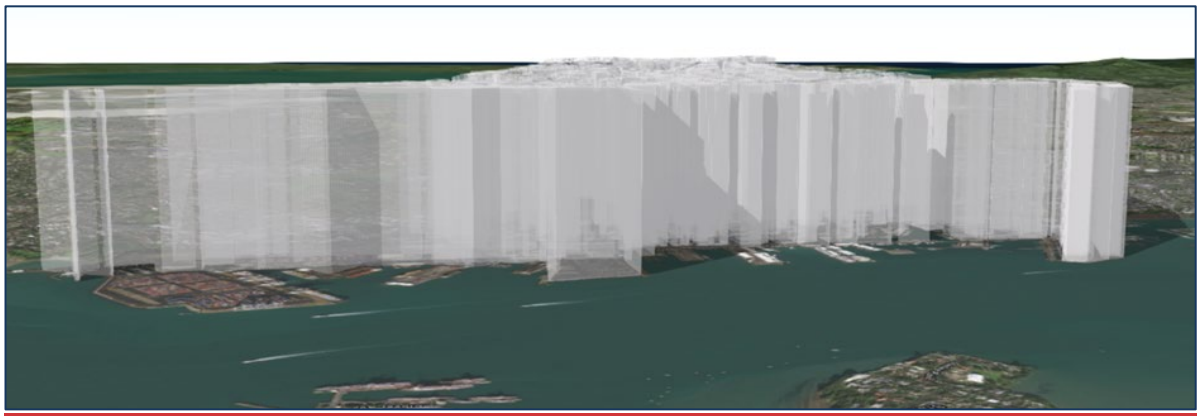
- Smaller, quite compact individual building footprints;
- Either a square or north-south alignment;
- Spaces around and between them running towards and away from the harbour;
- Opening out towards the harbour; and
- A stronger diversity.

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

1.4 Recommendations

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





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

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

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

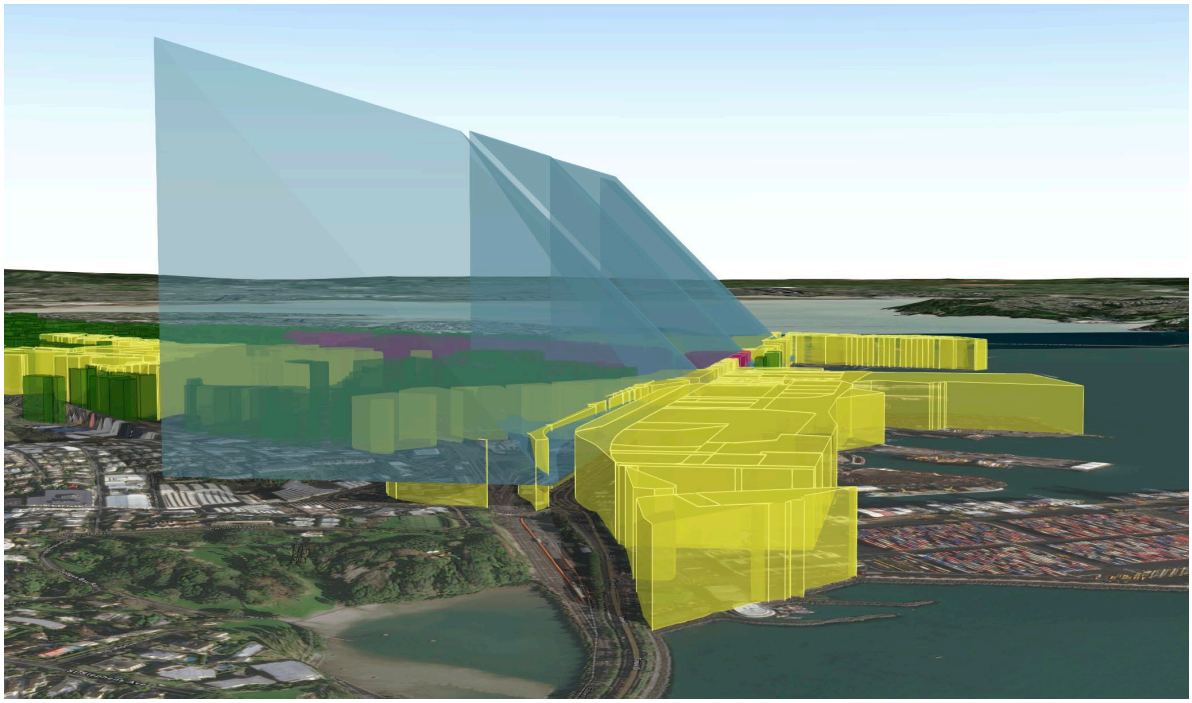
Exploring both of these issues, Auckland Council has worked with Architectus to model different recession planes and development footprint scenarios for the central City and its margins. The following analyses address those scenarios.

Waterfront Harbour Edge (Set-back) Control:

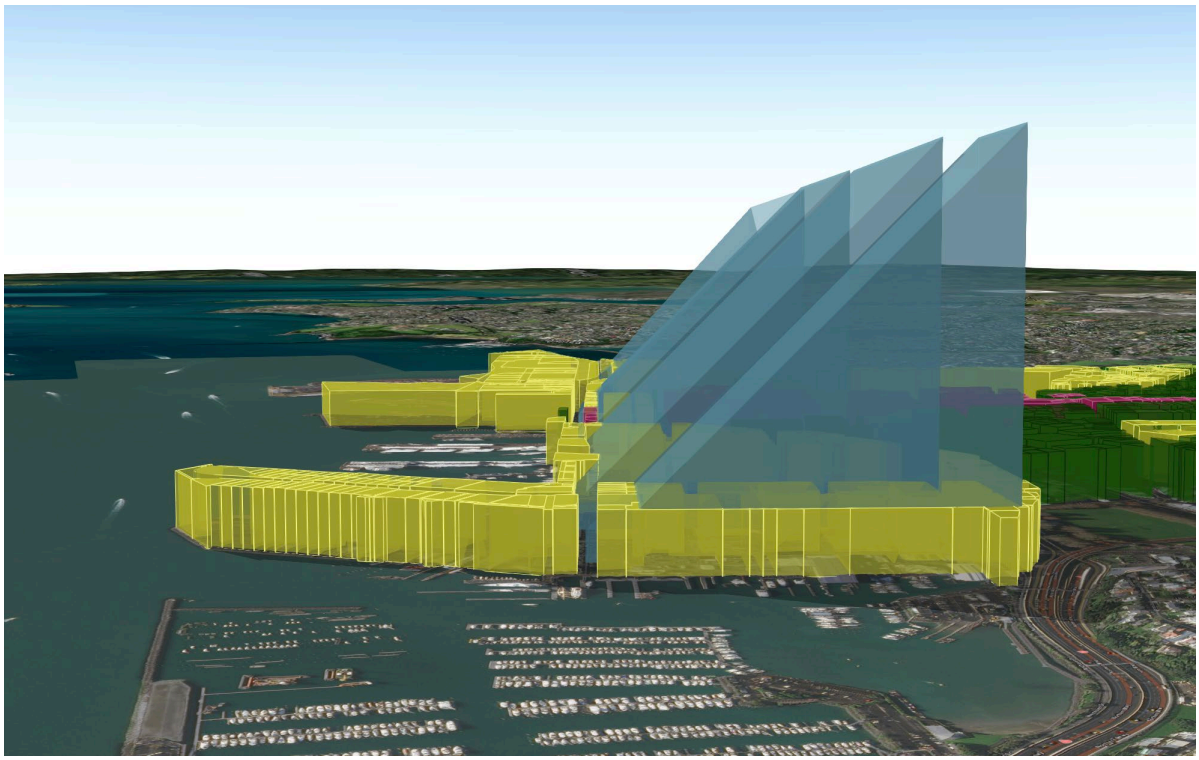
Use of a sloping height control or controls to manage building height near Auckland's waterfront has the potential to maximise the metaphorical 'rows of seating' within both apartment towers and commercial buildings that remain connected to the Waitemata Harbour in the long term. To test the application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

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

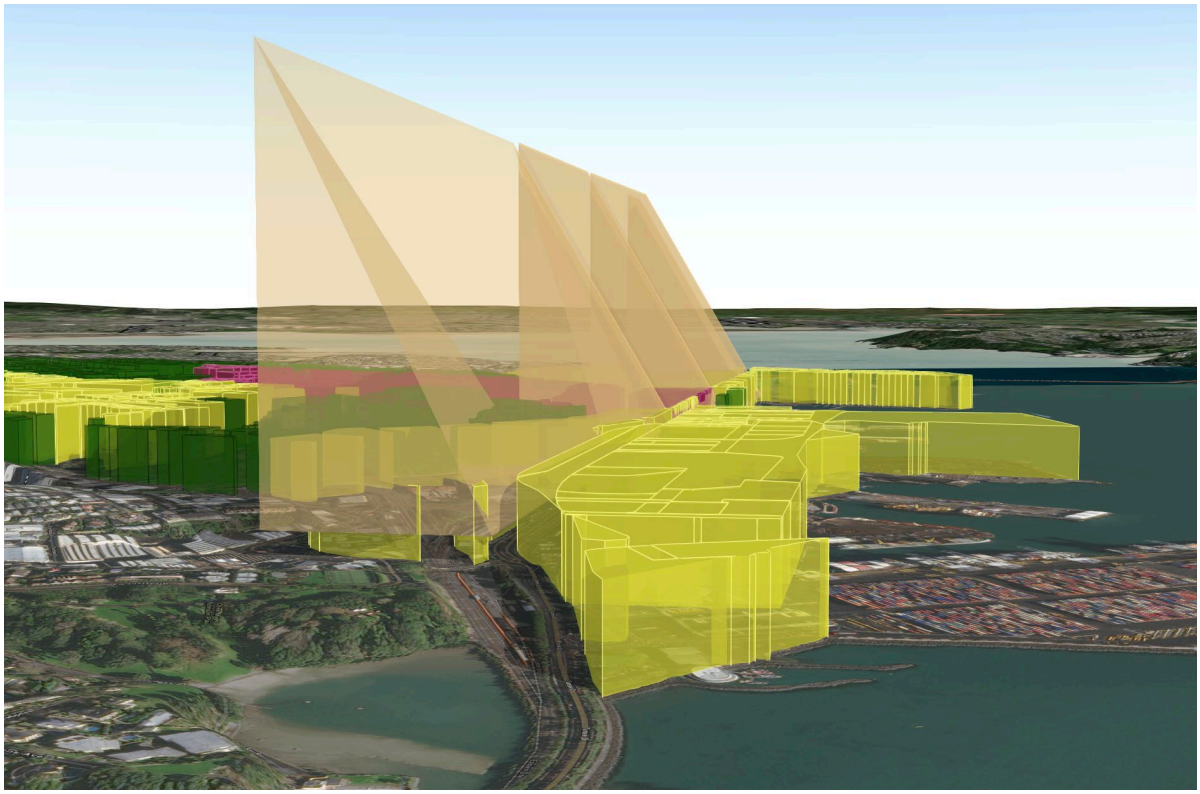
The main beneficiaries of both set-backs would be those living and working in those CBD towers that climb above approximately 12 storeys, and many of these would be among Auckland's wealthier city residents. Regardless, greater benefit would be derived for the wider residential and working populations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



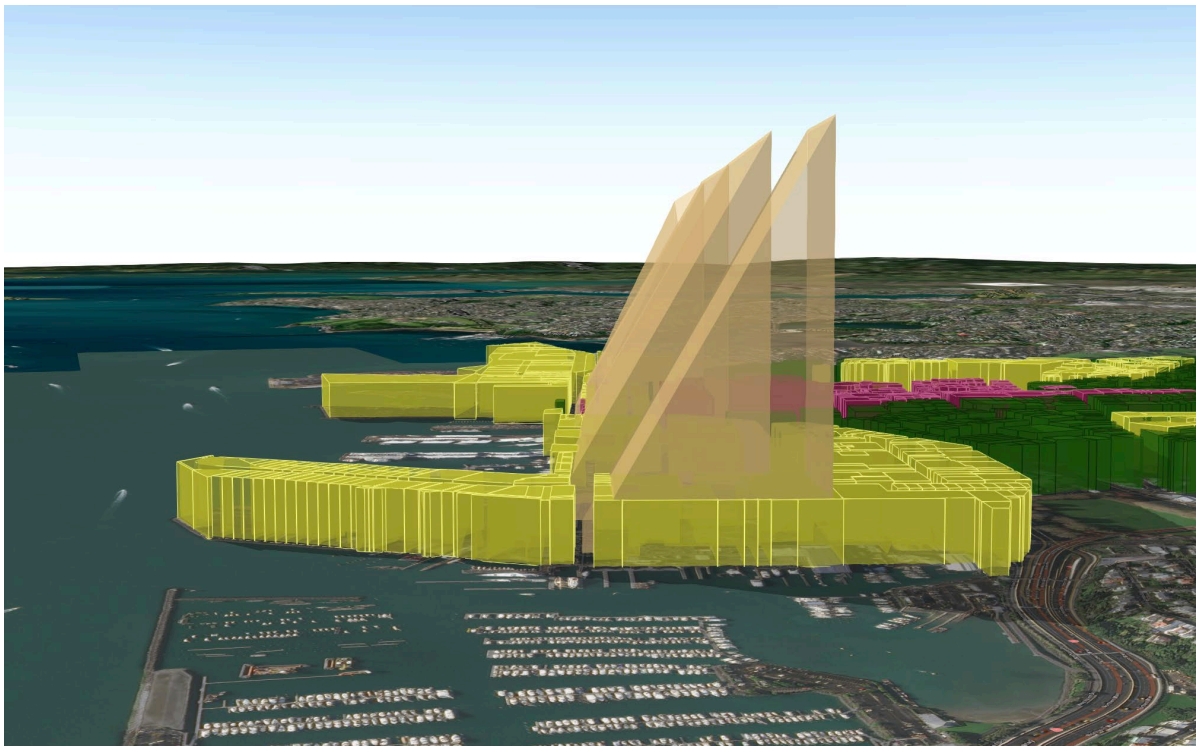
Screenshot of the modelled 40m + 45º Waterfront Harbour Edge Control – viewed from east of the CBD



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



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



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

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

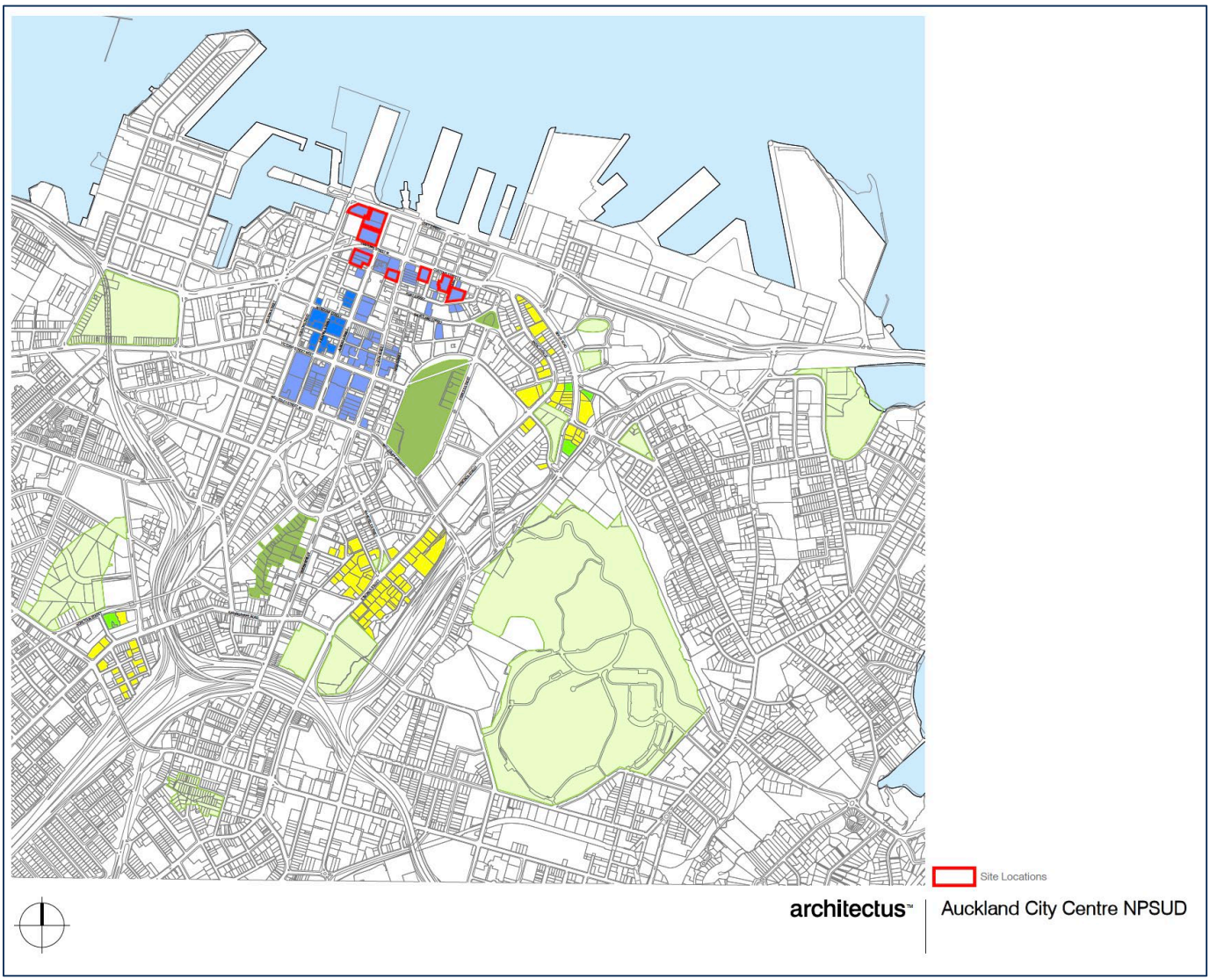
On the basis of this analysis, the 40m plus 45° Waterfront Harbour Edge Control is strongly supported, as It would greatly expand the number of city residents and workers alike who eventually have 'front row seats' in relation to harbour views. In addition, this control would help to maintain both views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

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

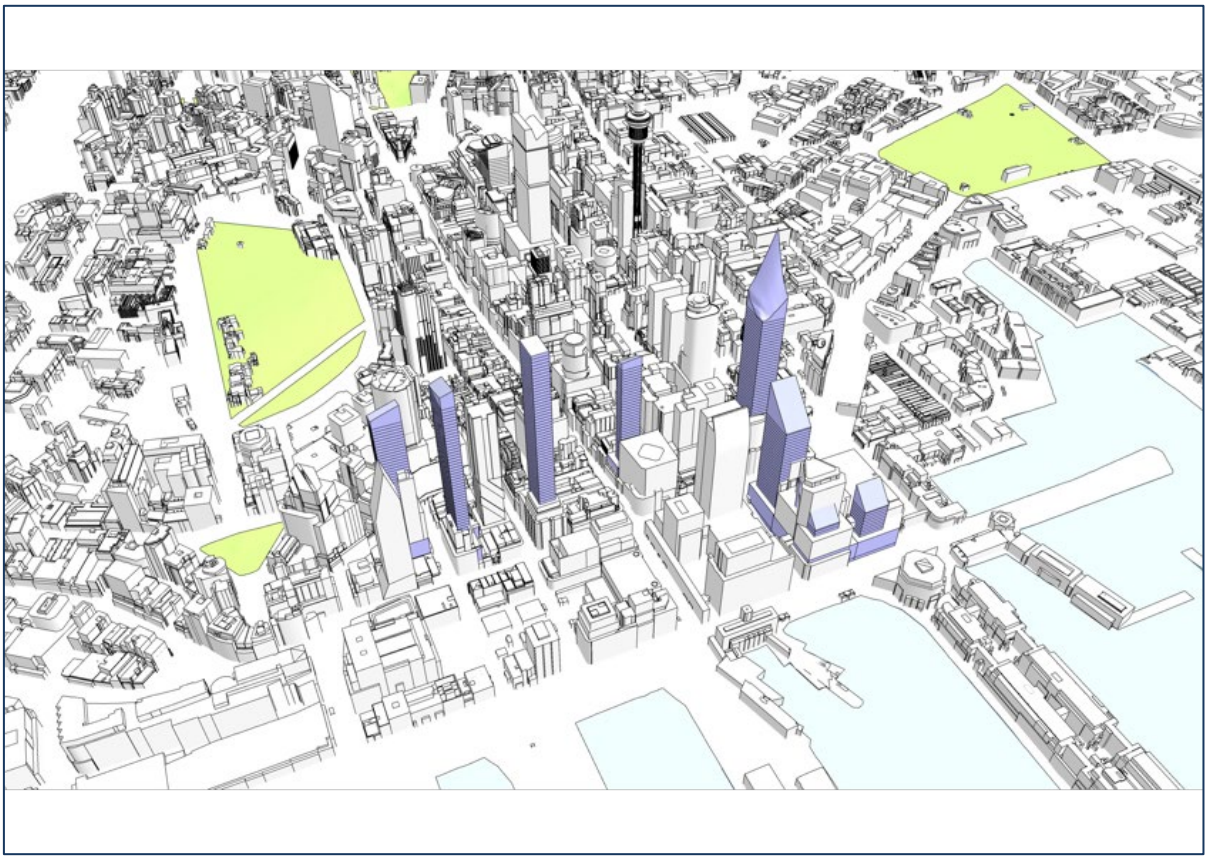
The option of applying similar or the same controls to other parts of the city waterfront – for example, around Wynyard Precinct – has also been considered. However, this would adversely impact on the permeability of the city periphery and, just as important, the future form of the central city – which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

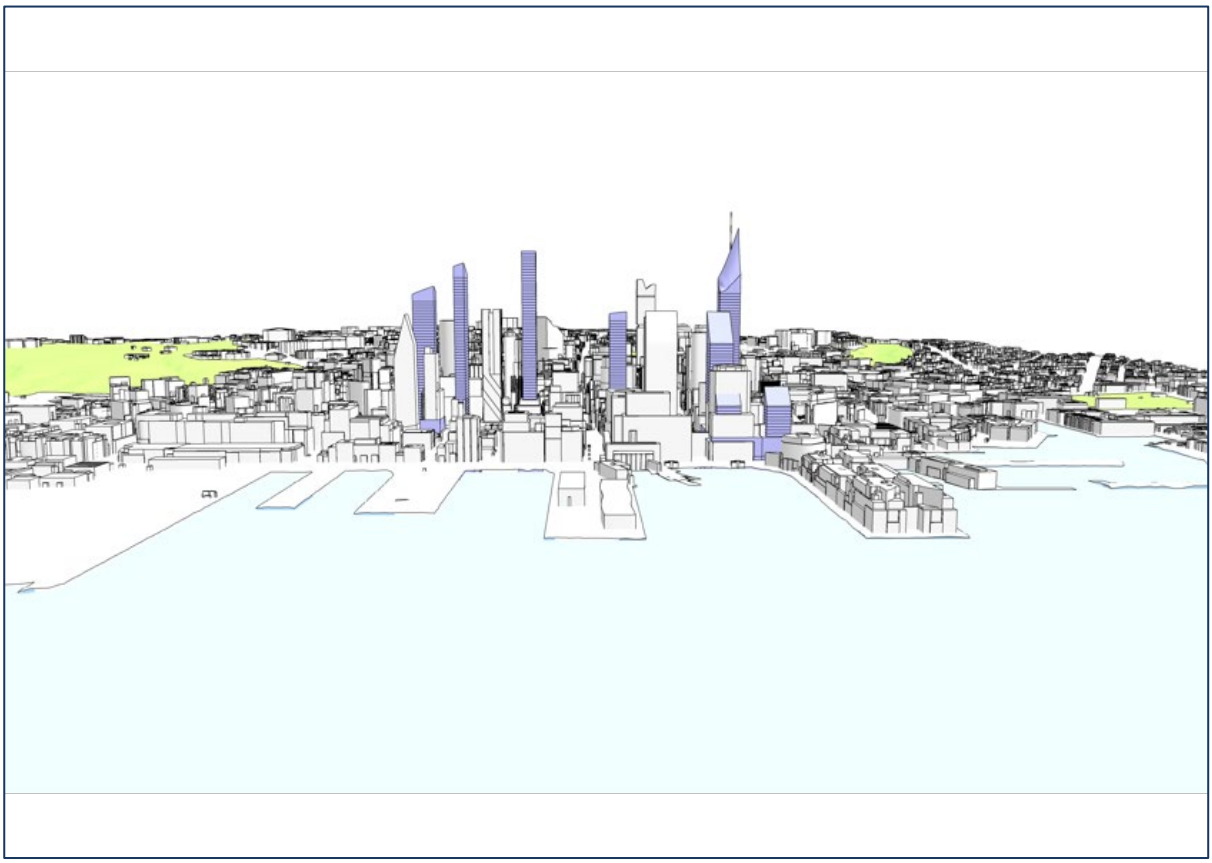
CBD Building Footprint Controls:

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



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





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

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

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

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

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

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

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

Other Measures:

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

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

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

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

2. Volcanic Viewshafts & Height Sensitive Areas

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

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

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

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

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

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

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

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

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

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

(ii) detract from the values of the view.

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

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

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

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

2.1 Auckland's Volcanic Viewshafts

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SIGNIFICANCE OF THE CONE:

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

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

VIEWSHAFT T01: THE AUCKLAND WAR MEMORIAL MUSEUM STEPS TO RANGITOTO

SIGNIFICANCE OF THE CONE:

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

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

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

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

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

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

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

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

2.2 Height Sensitive Areas & Their Management

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

- To maintain the connections and associations between individual maunga and the communities around them, thus contributing to the local amenity, identity and sense of place associated with those localities; and

- To cumulatively maintain the visual primacy of the maunga at the local level, as well as the regional level, thus enhancing the collective values of the maunga across the Isthmus and its margins.

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

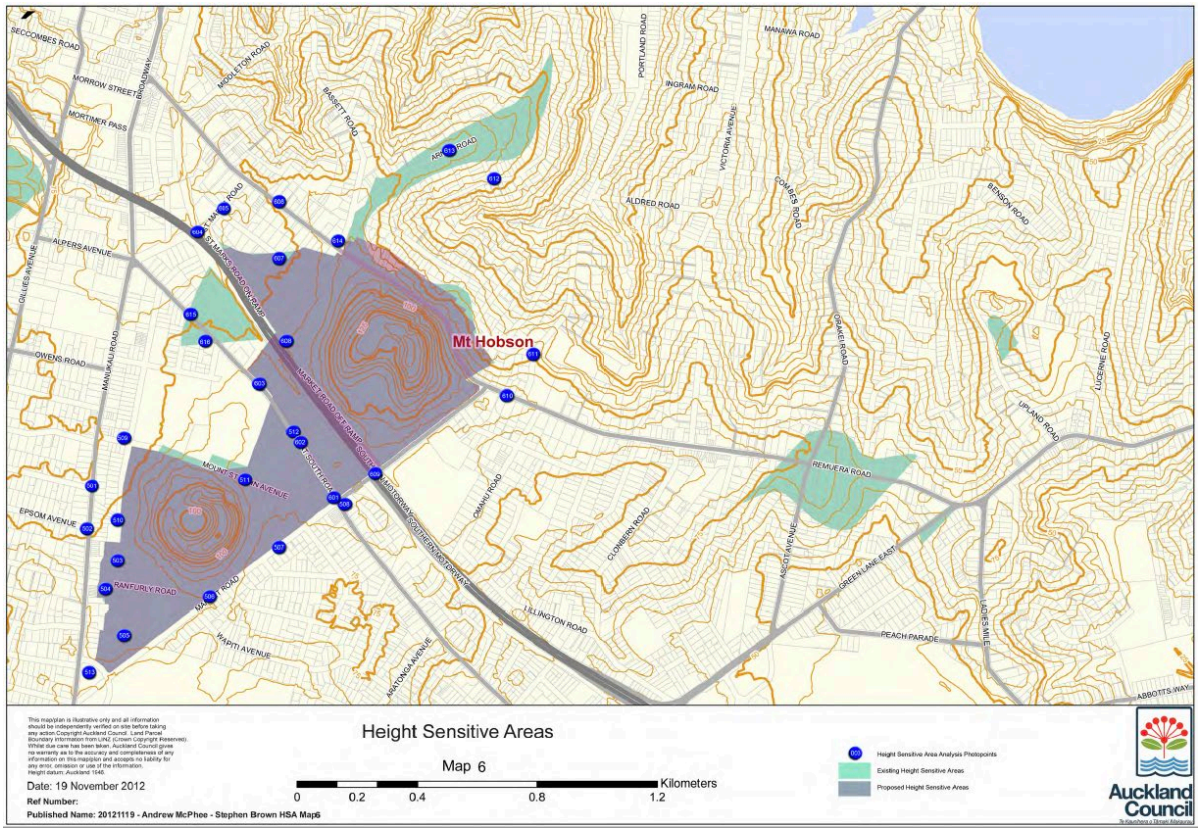
> *"**Retention of the array of relatively close-up views to each cone from its more immediate public surrounds**: These views and glimpses complement the longer distance, more strategic, regionally significant views captured by the Volcanic Viewshafts. Whereas those, very specific, views are identified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

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

This assessment was undertaken for the following maunga:

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

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



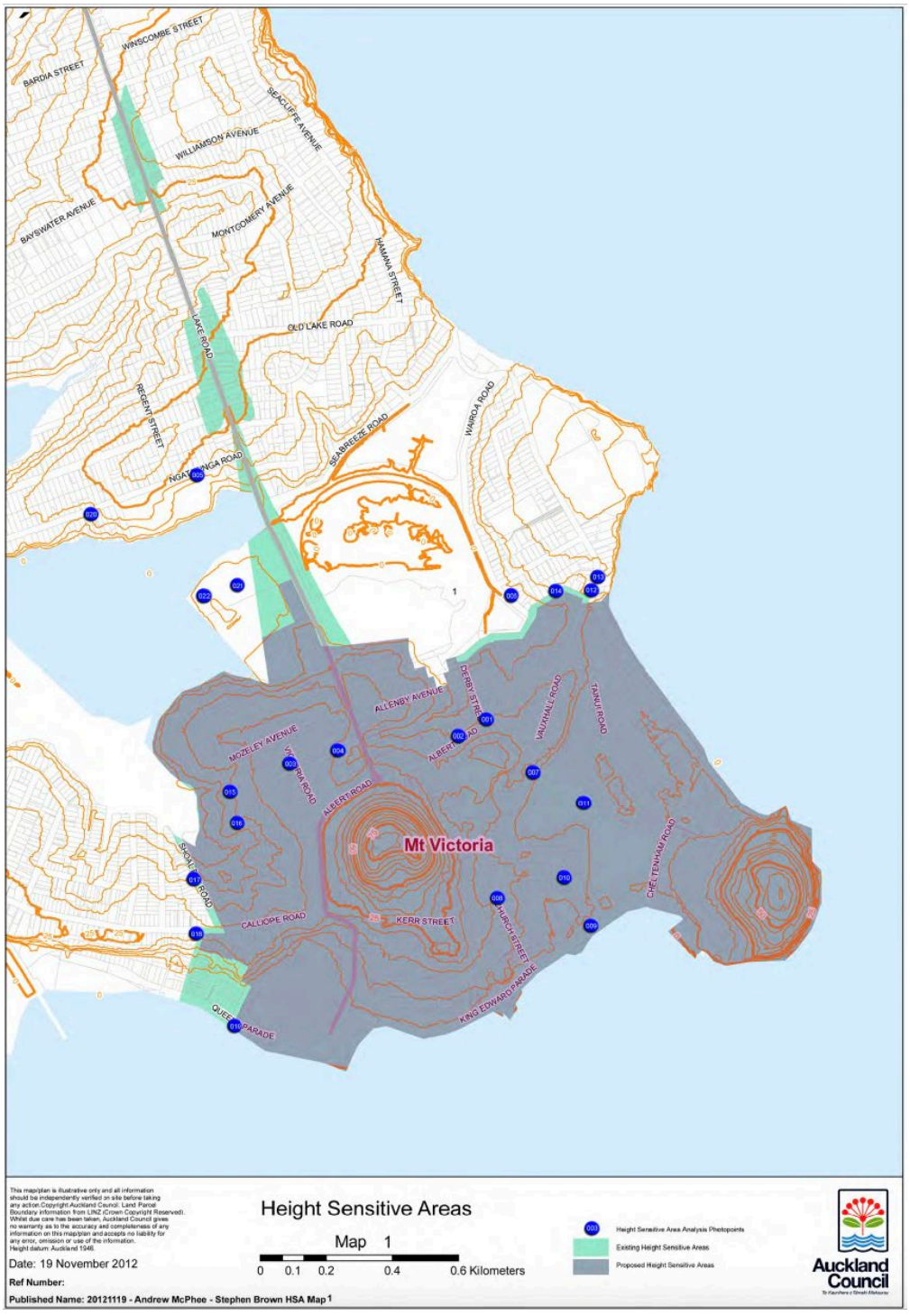
Mt Hobson Height Sensitive Area Map showing recommended changes to the 1976 HSA & photopoints

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

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

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

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



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

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

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

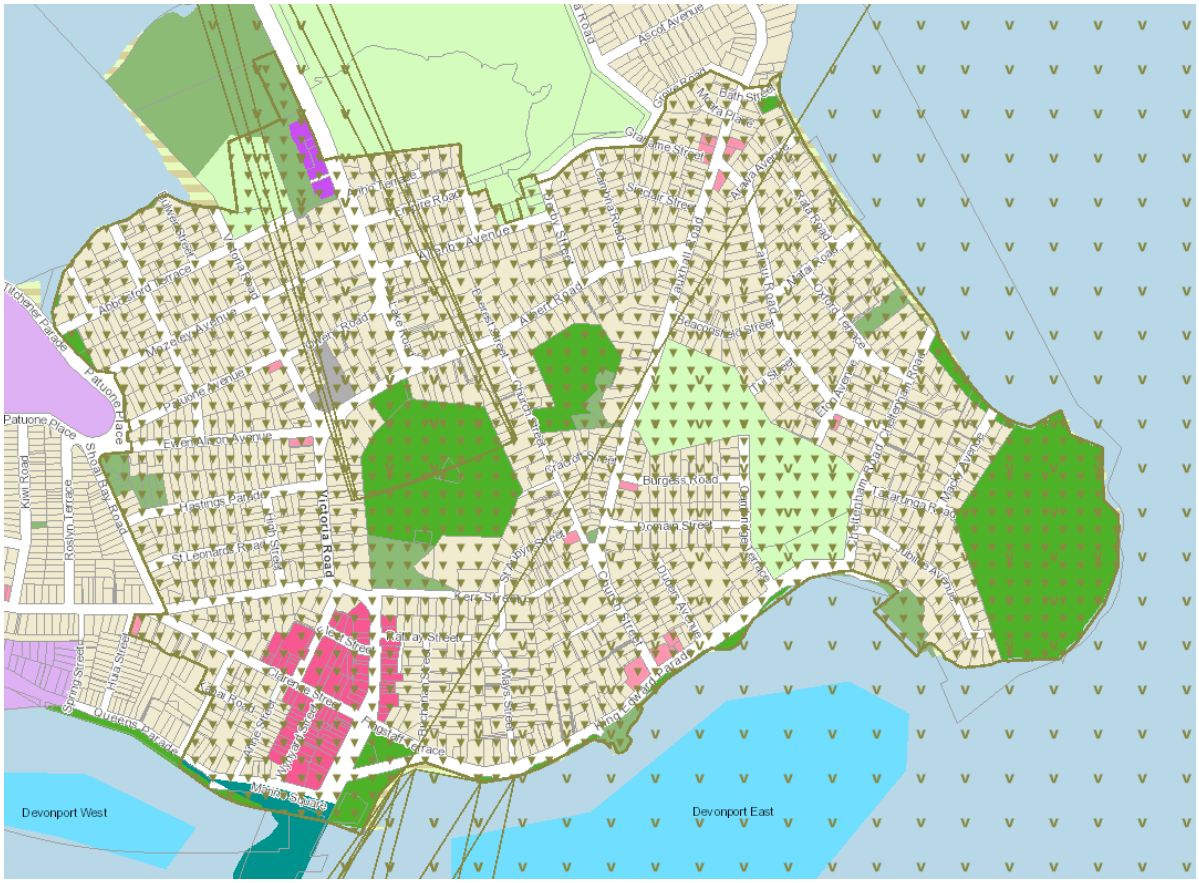
Turning to the key issue of how the HSAs should therefore be managed, it appears that there are two options in this regard:

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

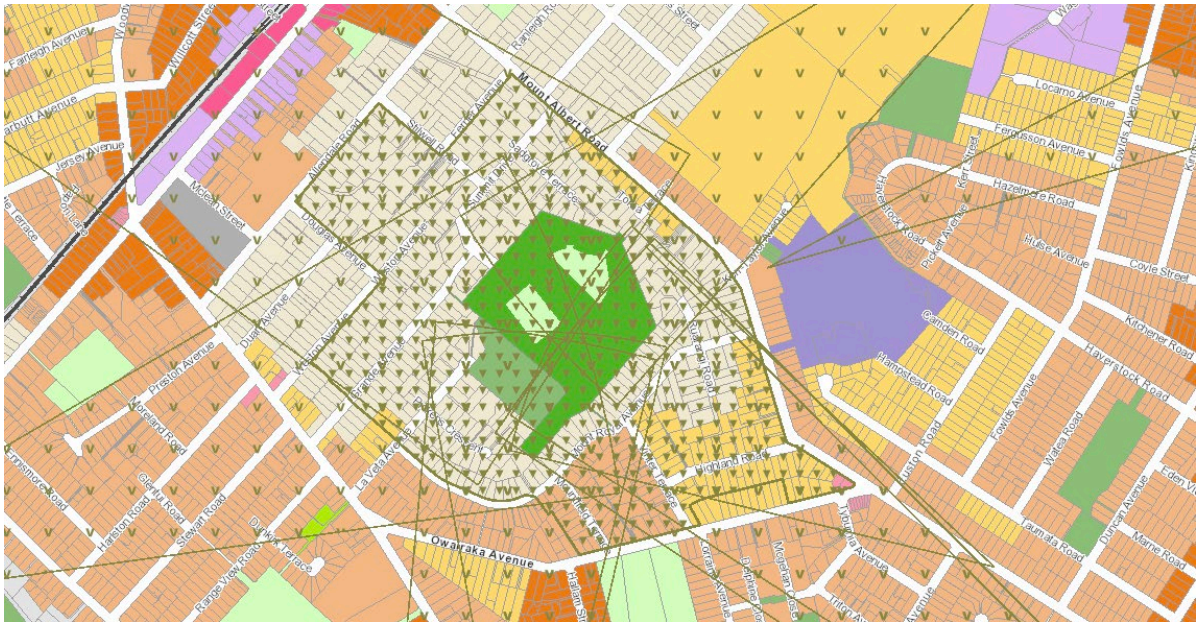
policies. However, it would not address existing Terrace Housing and Apartment Buildings (THAB) development found within some HSAs.

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

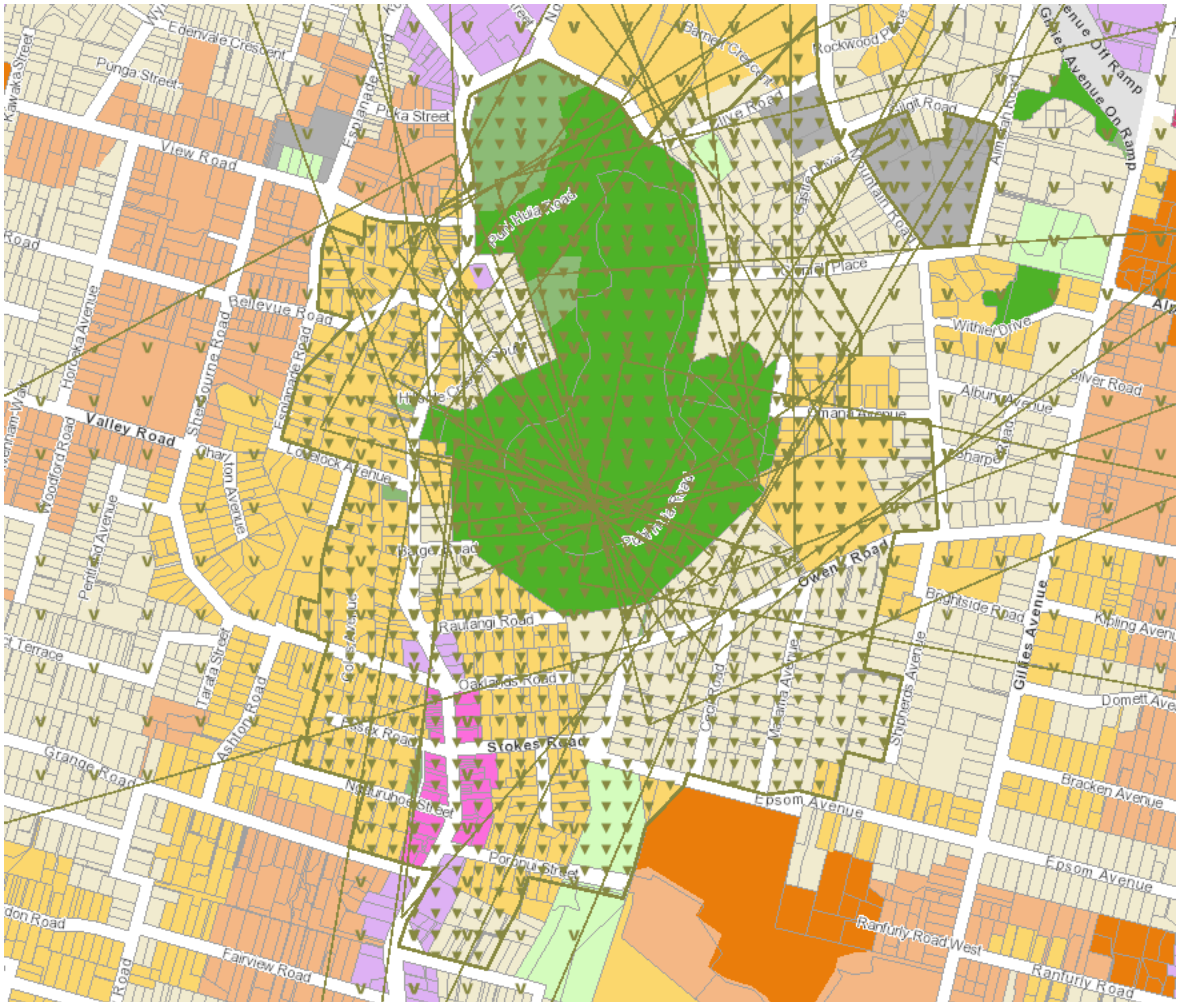
To examine the issue of these two approaches further, I have reviewed the HSAs and explored the extent to which MHU and THAB zones are found within each, and what effect intensification within them would impact on individual maunga. The following images show the full suite of HSAs found around Auckland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



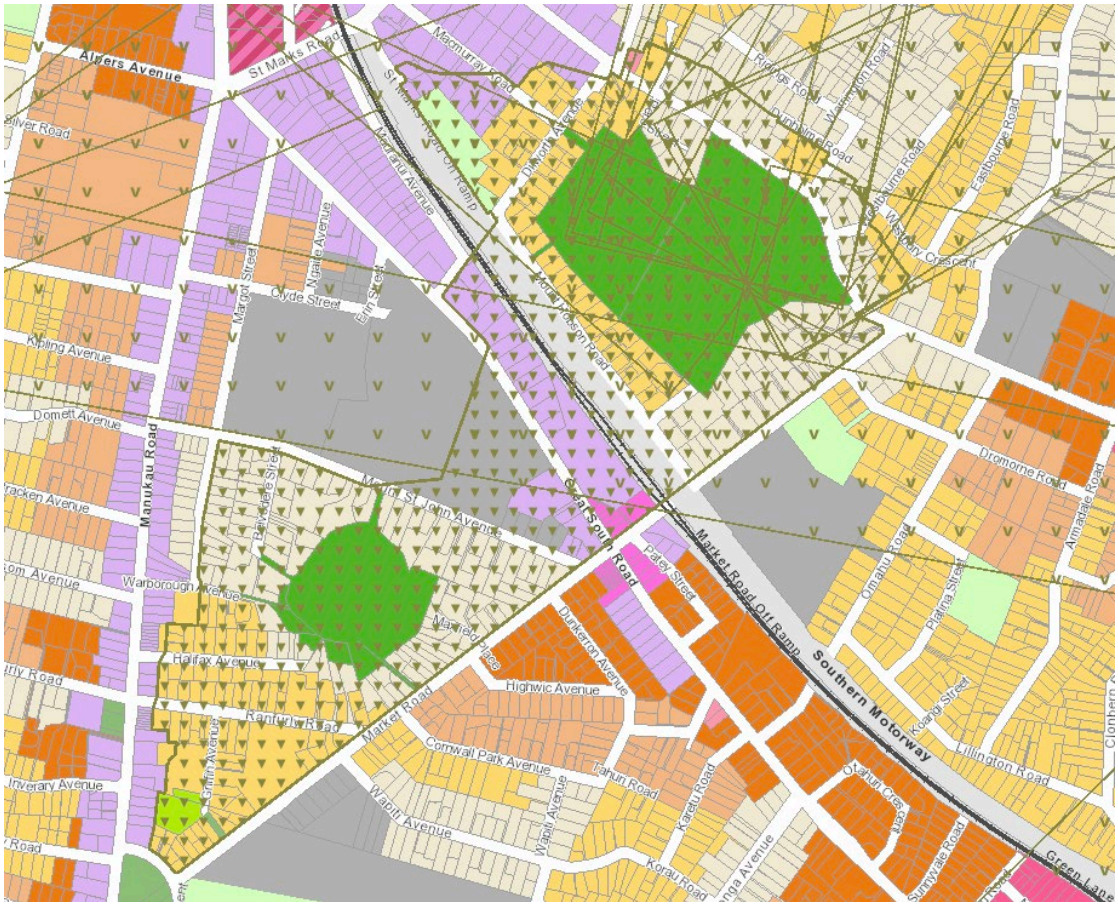
Mt Victoria / Takarunga & North Head / Maungauika



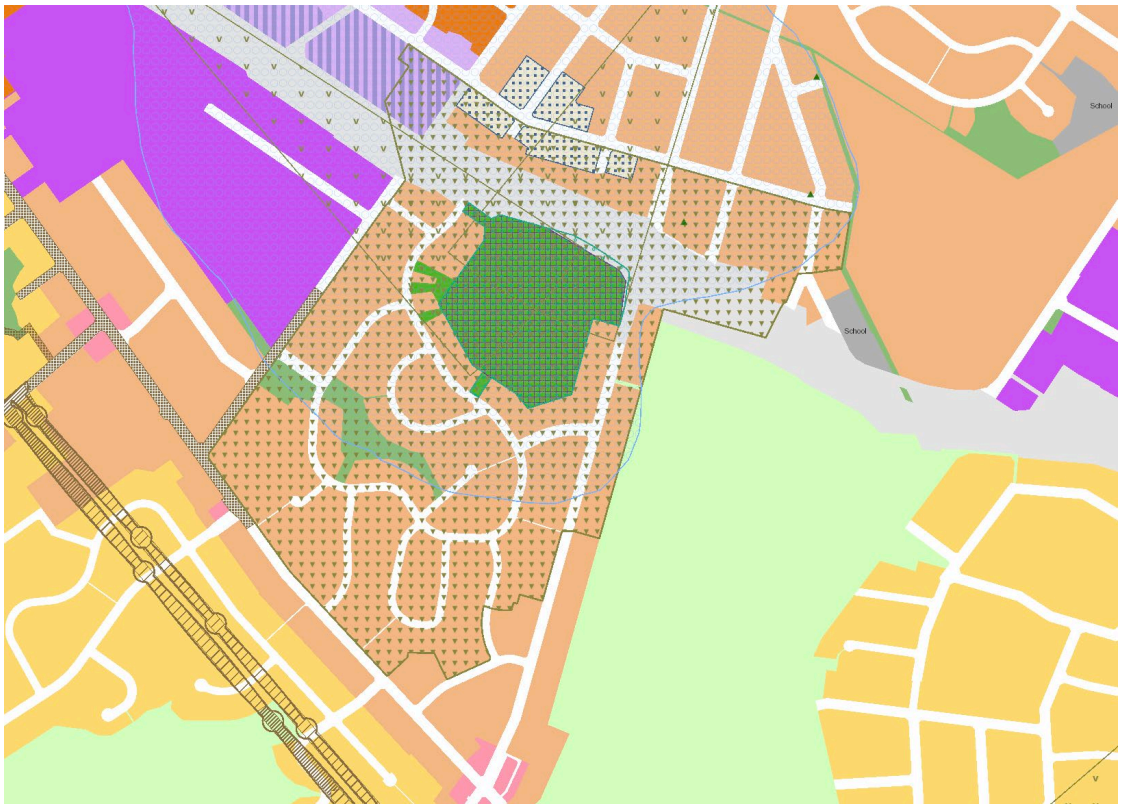
Mt Albert / Owairaka



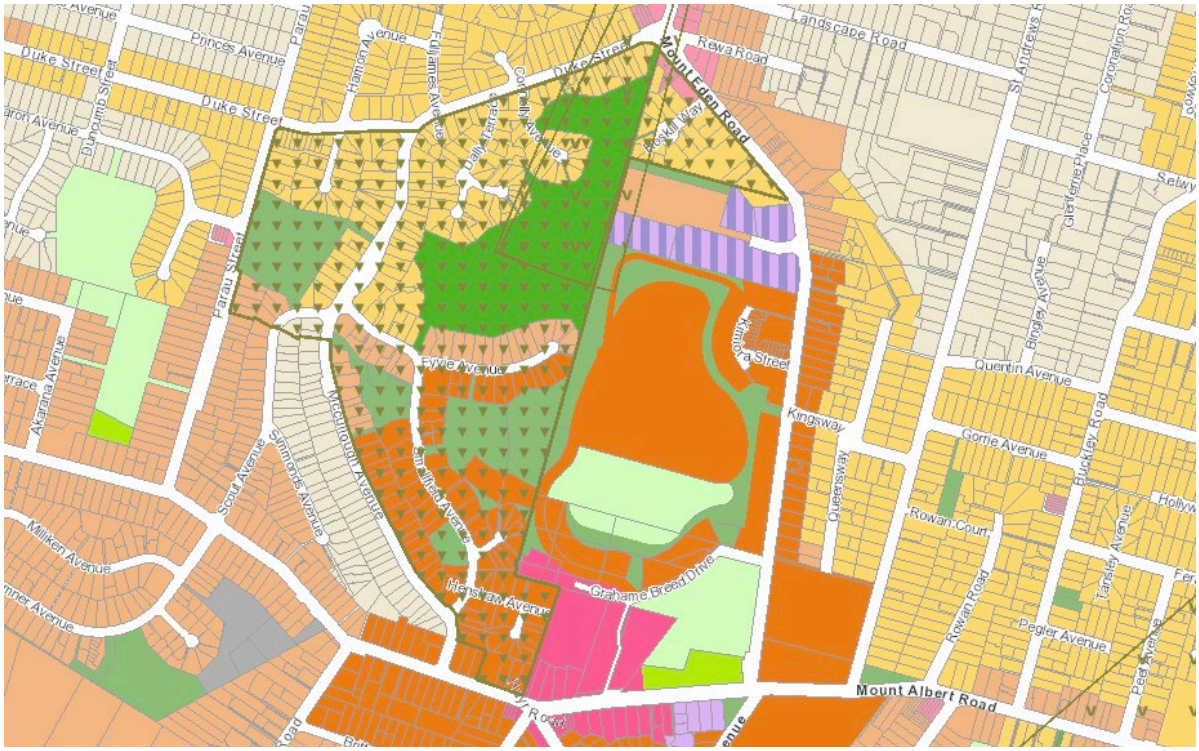
Mt Eden / Maungawhau



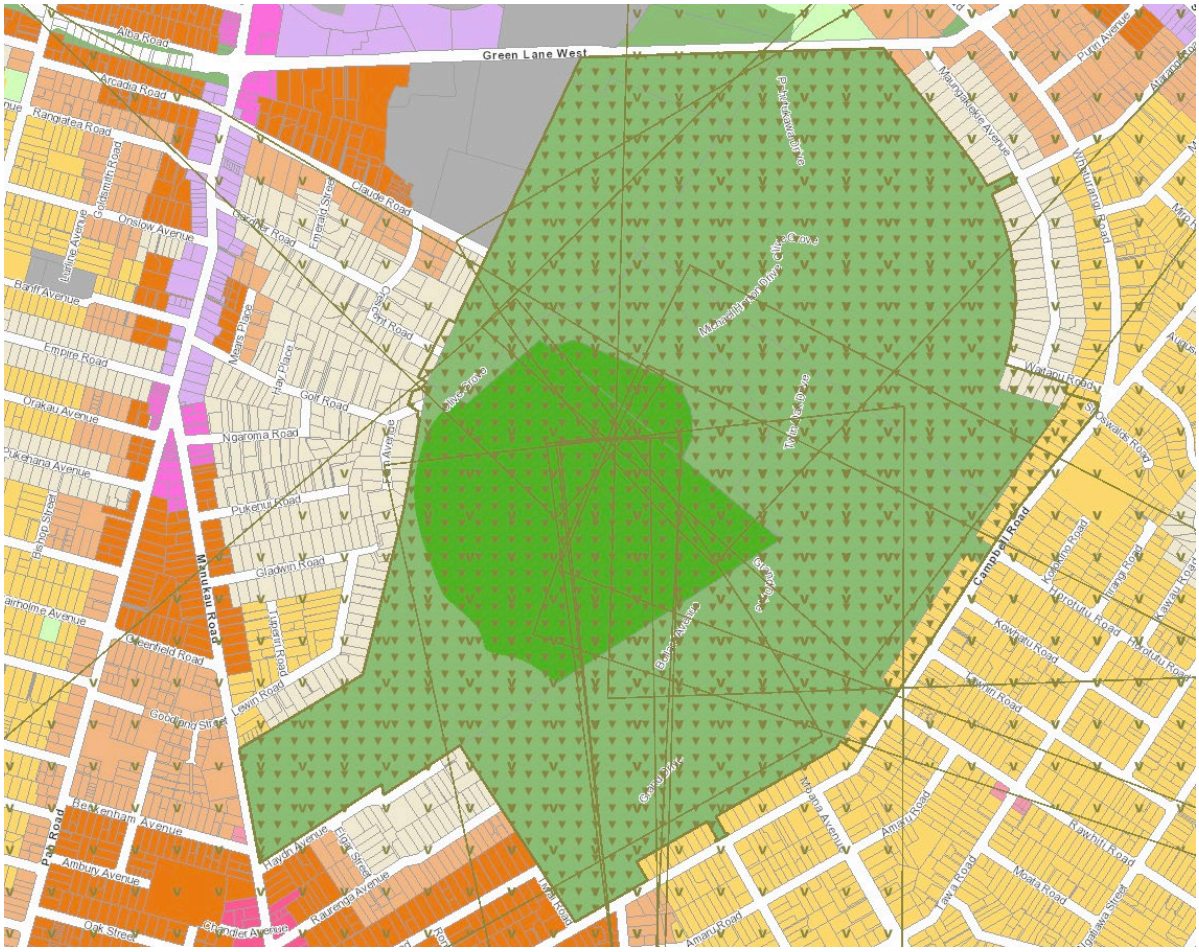
Mt St John / Te Kopuke & Mt Hobson / Ohinerau



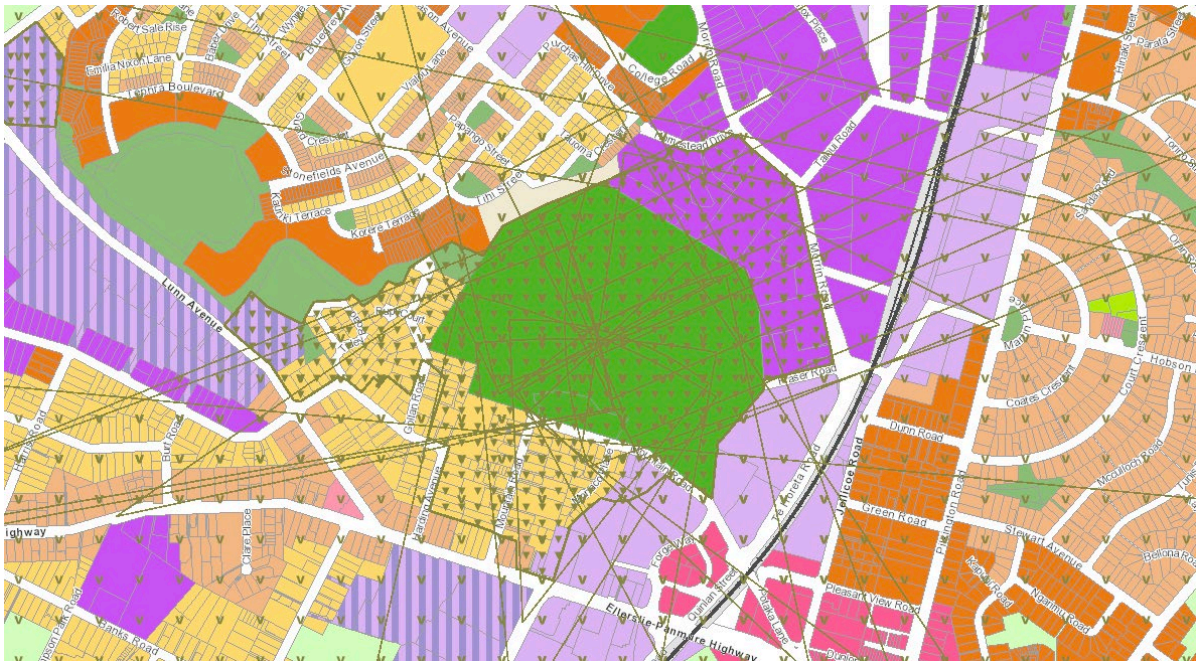
Mt Roskill / Puketapapa



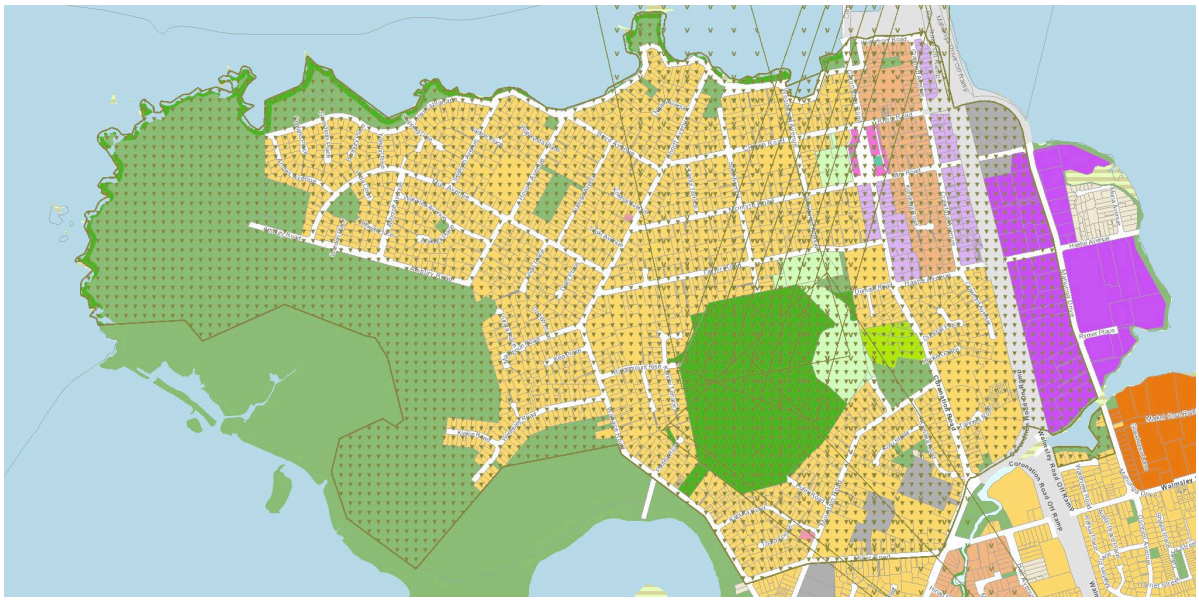
The Big King / Te Tatua a Riukiuta



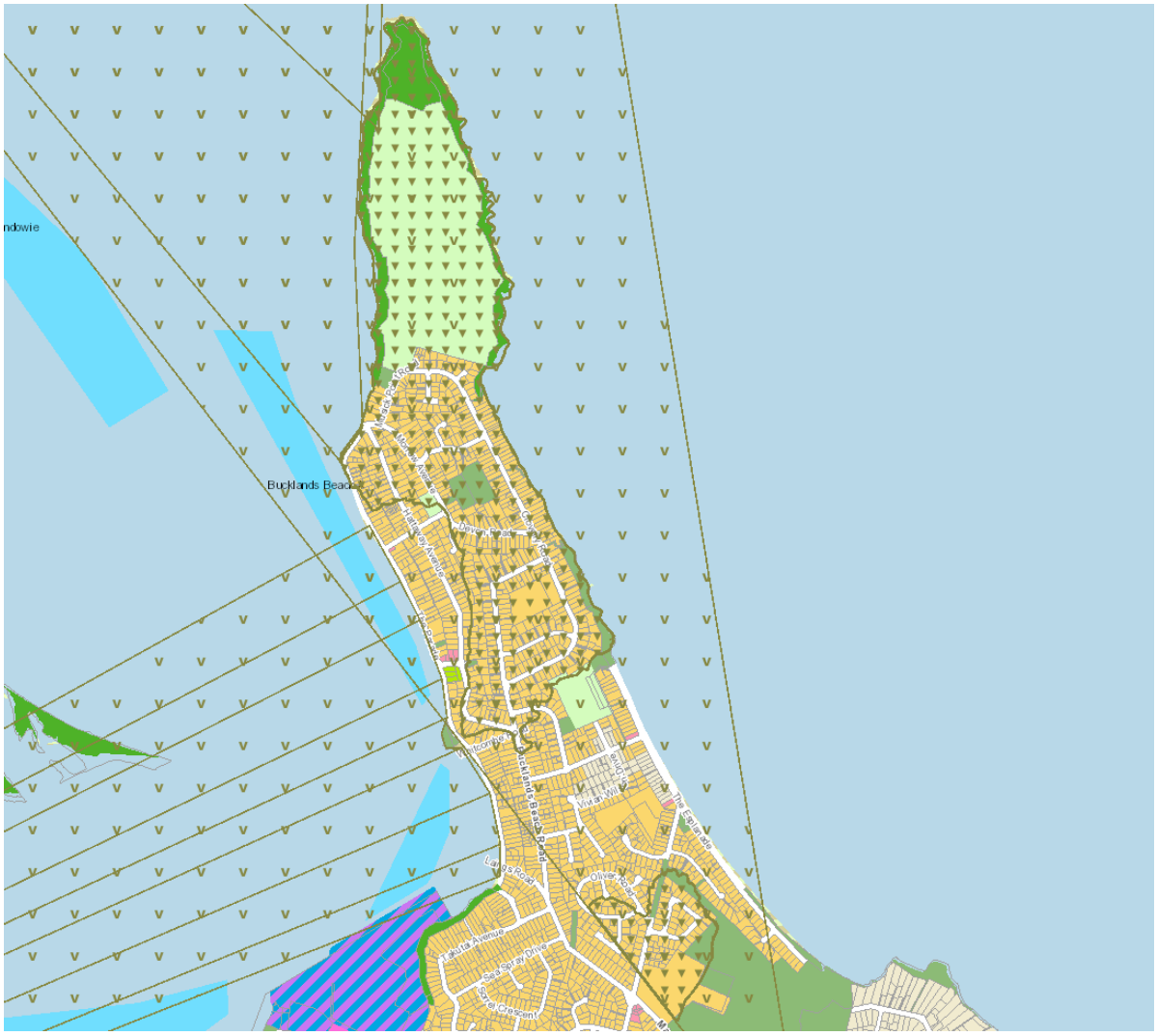
One Tree Hill / Maungakiekie



Mt Wellington / Maungarei



Mangere Mountain



Brown Island / Motukorea

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

Very Low

Low

Low-Moderate

Moderate

Moderate-High

High

Very High

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

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

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

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

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

2.3 Management of the Viewshaft & HSA Margins

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

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

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

Volcanic Viewshafts

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

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

Height Sensitive Areas

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

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

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

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

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

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

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

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

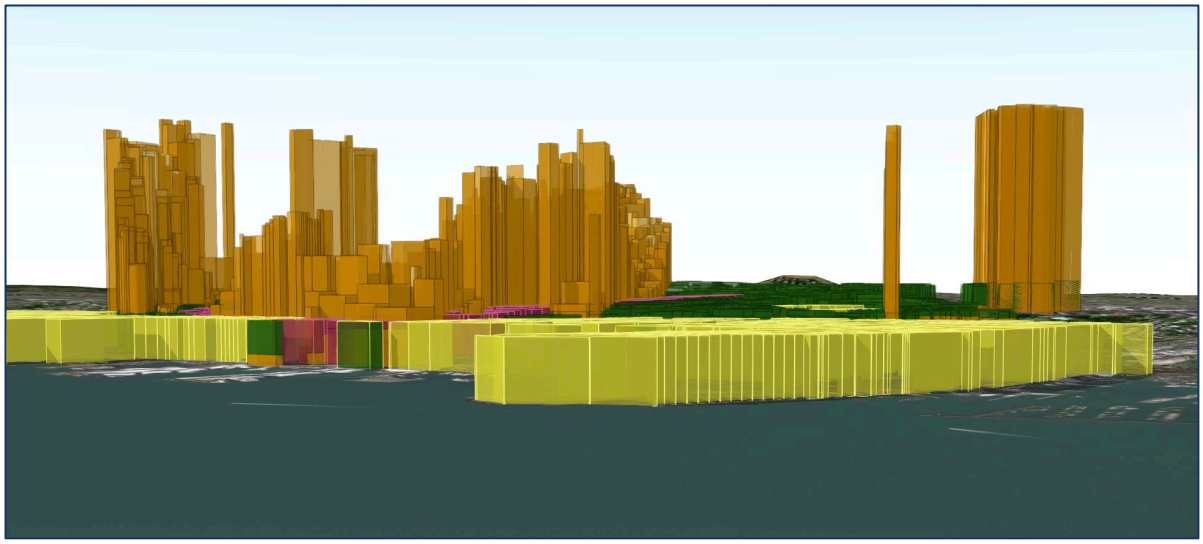
the myriad glimpses and small-scale views of maunga that also contribute to their 'ownership' by local communities.

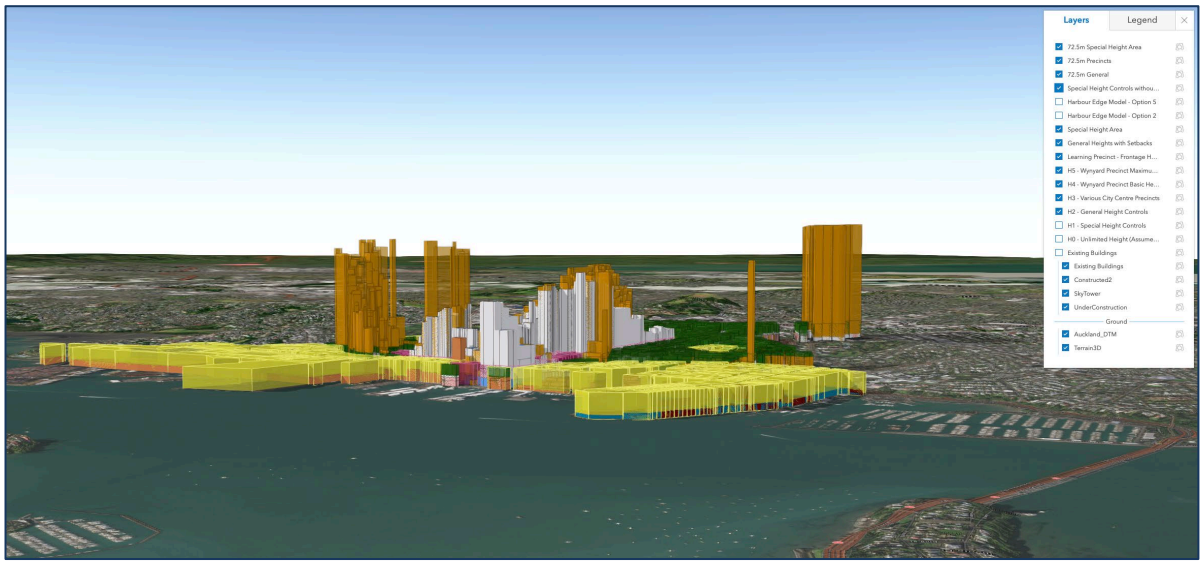
Together, such changes have the potential to create walls of development between individual streets and the local street networks that they are currently linked to. Consequently, intensification within the HSAs has the potential to rapidly erode or remove some and reshape others – by removing the visual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

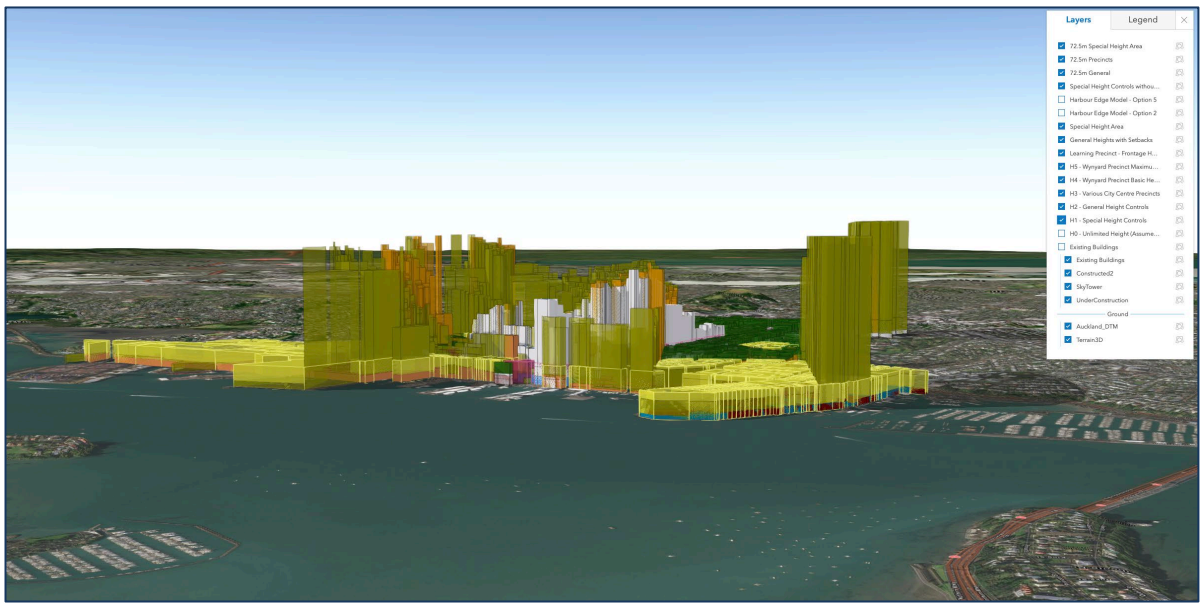
2.3 The Volcanic Cones & The Form of The Central City

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

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

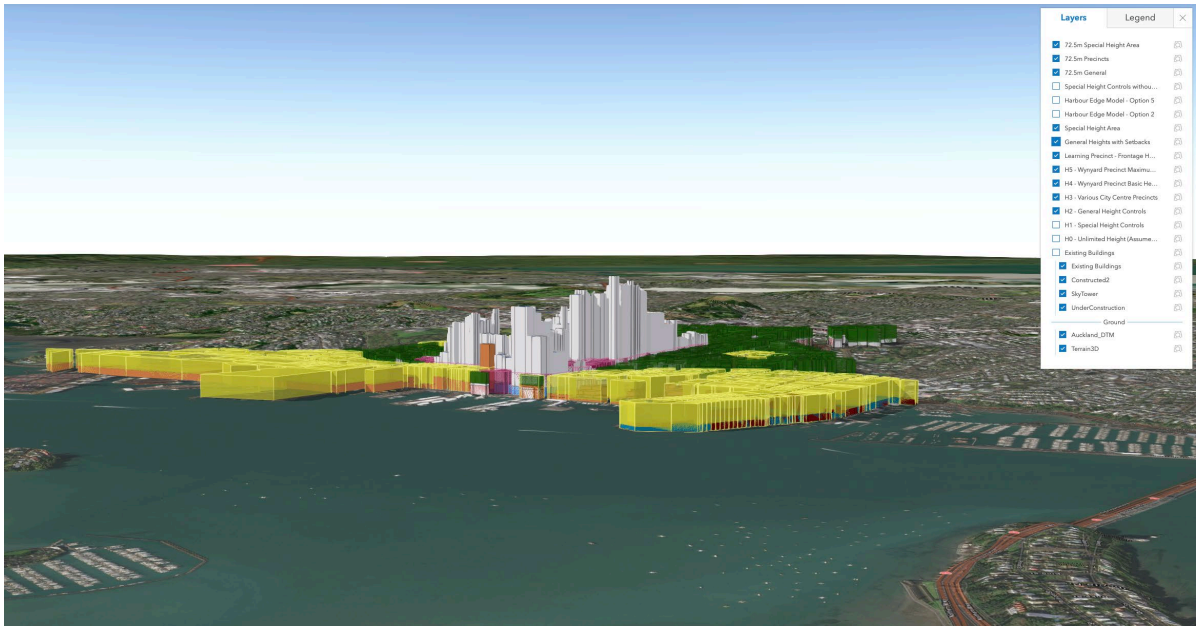






Different permutations on this scenario, as shown above, would also introduce built forms that visually suppress, even subjugate, the natural landforms and geomorphological heritage of Auckland City. Key volcanic features, like Mt Eden would be reduced to the role minor geomorphological ‘bumps on the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

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



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

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

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

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

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

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

3. Outstanding Natural Landscapes

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

ONL 33. Omaha Kahikatea Swamp Forest (Omaha)

ONL 35. Northern & Mangatawhiri Spit (Omaha)

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

ONL 43. West Mahurangi Harbour (Warkworth)

ONL 44. Mahurangi – Waiwera (Hatfields Beach)

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

ONL 51 Okura Estuary (Long Bay)

ONL 53. Lucas Creek (Albany)

ONL 54. Okura Estuary Headlands (Long Bay)

ONL 69. Omana Regional Park

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

ONL 72. South Titirangi (Titirangi & Waima)

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

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

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

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

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

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

B4.2.1. Objectives

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

D10.3. Policies [rcp/dp]

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

- *(a) avoiding the adverse effects of inappropriate subdivision, use and development on the natural characteristics and qualities that contribute to the values of the outstanding natural landscape;*
- *(b) maintaining the visual coherence and integrity of the outstanding natural landscape;*
- *(c) maintaining natural landforms, natural processes and vegetation areas and patterns;*
- *(d) maintaining the visual or physical qualities that make the landscape iconic or rare; and*
- *(e) maintaining high levels of naturalness in outstanding natural landscapes that are also identified as outstanding natural character or high natural character areas.*

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

- *(a) the extent of anthropogenic changes to the natural elements, patterns, processes or characteristics and qualities;*
- *(b) the presence or absence of structures, buildings or infrastructure;*
- *(c) the temporary or permanent nature of any adverse effects;*
- *(d) the physical and visual integrity and the natural processes of the location;*
- *(e) the physical, visual and experiential values that contribute significantly to the natural landscape's values;*
- *(f) the location, scale and design of any proposed development; and*
- *(g) the functional or operational need of any proposed infrastructure to be located in the outstanding natural landscape area.*

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

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

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

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

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

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

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

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

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

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

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

ONL 43 opposite Warkworth's town centre

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

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

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

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

4. Areas of Outstanding & High Natural Character

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

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

Related objectives and policies in the AUP include the following:

B8.2. Natural character

B8.2.1. Objectives

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

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

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

B8.2.2. Policies

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

(a) natural elements, processes and patterns;

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

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

(d) the natural movement of water and sediment;

(e) the natural darkness of the night sky;

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

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

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

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

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

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

D11.2. Objectives [rcp/dp]

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

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

D11.3. Policies [rcp/dp]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.1 Outstanding Natural Character Areas

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

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

4.2 High Natural Character Areas

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

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

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

HNC Area 53. Omaha

HNC Ara 57. Brick Bay (Sandspit)

HNC Areas 85 & 86: Waiwera River and Waiwera

HNC Area 88. Shakespeare Regional Park (Whangaparaoa Peninsula)

HNC Areas 102-105. Lucas Creek

HNC Area 139. Pollen Island (inner Waitemata Harbour)

HNC Area 140. Watchman Island (Waitemata Harbour)

HNC Area 141. South Titirangi (Manukau Harbour)

HNC Area 142. Tohuna Torea (Tamaki River)

HNC Area 143. Motukoraka Island (Beachlands)

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

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

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

HNC Area 58. Mahurangi River Southern Escarpment (Warkworth)

HNC Area 87. Coal Mine Bay (Whangaparaoa Peninsula)

HNC Area 89. Matakatia Bay (Whangaparaoa Peninsula)

HNC Area 91. Weiti River (Whangaparaoa Peninsula)

HNC Area 92. Chenery Road (Whangaparaoa Peninsula)

HNC Area 95. Long Bay

HNC Area 96. The Tor (Torbay)

HNC Area 99. Kauri Point (Birkenhead)

HNC Area 101. Oruamo Creek (Greenhithe)

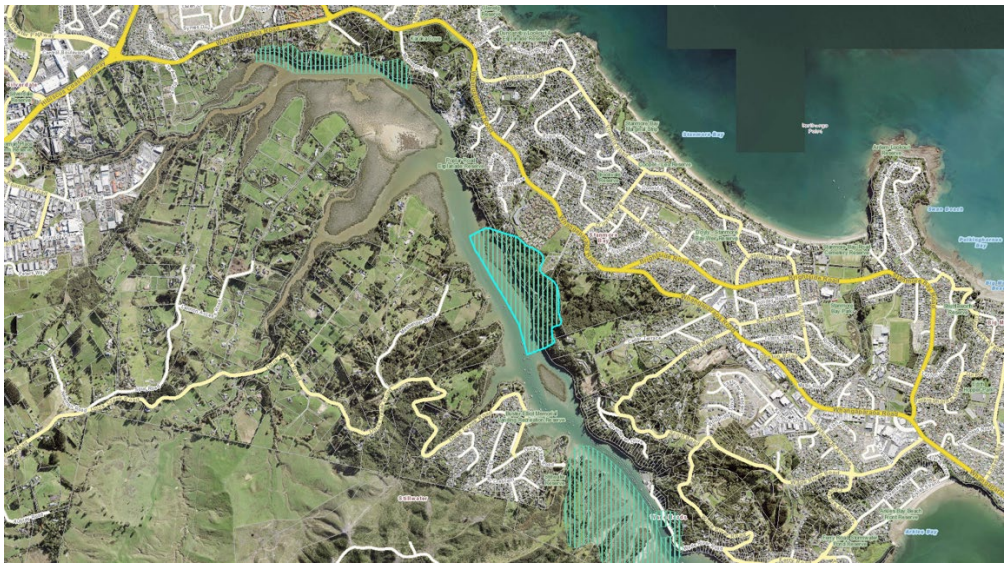
HNC Area 201. Lowtherhurst Reserve (Massey)

HNC Area 58 following the Mahurangi River

HNC Area 87 Coal Mine Bay

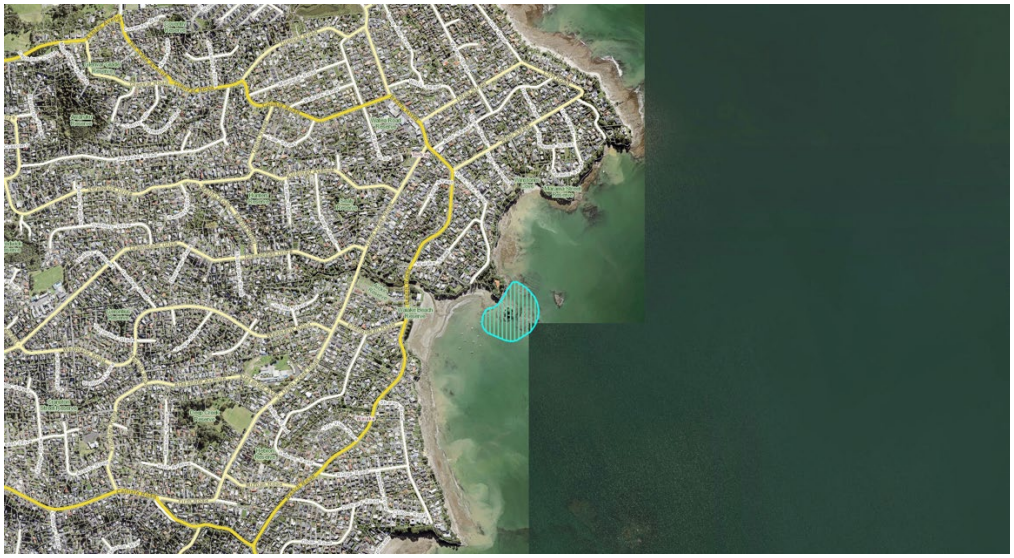
HNC Area 89 Matakatia Bay

HNC Area 91 Weiti River



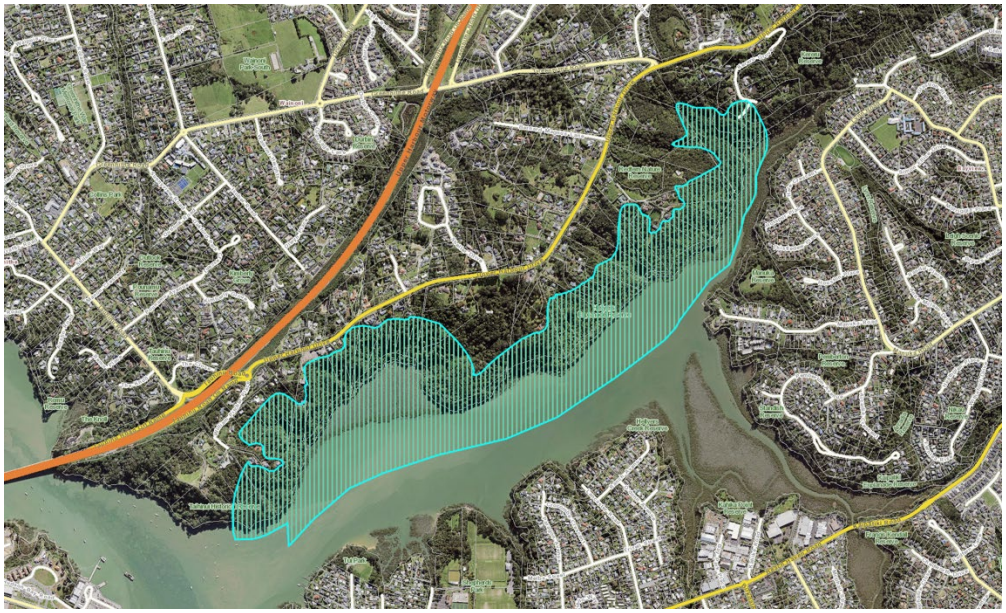
HNC Area 92 Chenery Road

HNC Area 95 Long Bay



HNC Area 96 The Tor

HNC Area 99 Kauri Point



HNC Area 101 Oruamu Creek

HNC Area 201 Lowtherhurst Reserve

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

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

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

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

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

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

Stephen Brown

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