

23 September 2024

Attention: Pamela Santos, Barker & Associates Limited

Dear Pamela,

Resource consent application – Further information request

Application number(s):	BUN60435935, LUC60435936, WAT60435937, DIS60435938
Applicant:	Precinct Properties New Zealand Limited
Address:	2 Lower Hobson Street, Auckland Central, 1010 204 Quay Street, Auckland Central Road – Lower Hobson Street, Fanshawe Street, Sturdee Street and Custom Street West
Proposed activity(s):	Demolition of the Downtown Car Park building and associated structures including the removal of the car park ramp and pedestrian footbridge to Fanshawe Street, and the pedestrian footbridge to 204 Quay Street (and associated stair access). Comprehensive redevelopment of the site to deliver a mixed use precinct comprising of three podiums providing for retail, food and beverage and office uses, connected through the city block to Lower Albert Street from Lower Hobson Street with a central public open space. Construction of two towers above podiums 1 and 2 to accommodate a mix of office activity and residential units reaching 227m and 168m in height respectively. Demolition and construction is anticipated to take up to seven years. A service lane connecting Custom Street West and Quay Street and associated landscaping.

Further to my letter of 22 August 2024 where I confirmed that your application was accepted for processing, I have now reviewed your application and inspected the site.

This letter is a request for further information that will help me better understand your proposal, including its effect on the environment and the ways any adverse effects might be mitigated.

Requested information

Planning

1. Matter of control H8.7.1(1)(b) reuse of building materials seeks details of the extent to which demolished materials are reused and recycled. The AEE states that *‘where possible*

demolished material will be repurposed or reused'. Please can additional information be provided as to the extent of demolished materials that may be reused or recycled.

2. Please can justification for adopting a 'commercial building vibration sensitivity' standard rather than a 'heritage building vibration' standard for 204 Quay Street be provided (as set out in the Noise and Vibration Assessment). As advised by the Noise and Vibration Specialist it is understood that this would normally be informed by a review of relevant documentation on building construction, maintenance, surveys and such.

Assessment of Environmental Effects

Please note that some of these queries and clarifications with respect of the AEE are intended to help achieve an AEE that is correct ahead of public notification of the consents. Some may not necessarily be best placed as a s92 matter, but are located here for ease.

3. Page 9 refers to overland flow path managed to avoid adverse effects, note that information regarding OLFP has not been provided within the Flood Report and that therefore this statement may need updating and other consequential update including possible further assessment depending on the detailed technical responses on this matter.
4. Pages 8 and 9 refers to direct Mana Whenua engagement by the applicant having informed the cultural narrative. Please can the details of that engagement be provided including but not limited the process, correspondence, and timeline of engagement and the outcomes from this process, please provide supporting information/correspondence provided demonstrating this engagement as part of any response.
5. The AEE at section 3.2 refers to an email being sent to Mana Whenua on 8 July 2024 with no responses received at the time of lodgement. In the event that responses have been received or engagement taken place as a result / since the lodgement of these consents please can this statement be updated and or details of those responses be provided.

Note: at the time of writing, Te Aakitai Waiohua (Jeff Lee) has registered an interest in these consents.

6. Page 13 of the AEE refers to the service lane connecting through to the M-Social site to the north. Please can this be checked for accuracy and updated? The service lane / laneway runs through the Aon and HSBC sites. The AEE may be referring to the access into the Downtown Car Park building direct from the M-Social site.
7. Section 4.2, fourth paragraph: please can this be checked for accuracy and updated depending on review. Flood plains and OLFP affect the site, but understood not to include coastal inundation 1m sea level rise, with the exception of 188 Quay Street which is not within the image being referred to.
8. Section 4.3 This describes the receiving environment. During the site visit (4 September), from the roof of the Downtown Car Park Building, a large bank of air conditioning units were seen located between the M Social building and the Downtown Car Park Building at relatively high level (6th floor). These were not running to full capacity but were particularly noisy. Please can it be clarified that this was known to the Acoustic Consultants and considered when preparing their reports.

9. Page 18 of the AEE states: “Six levels of basement are proposed which will contain a mixture of public and private car parking, bicycle parks, storage areas for the residential units for the first 5 levels and a single additional localised basement level to accommodate water tanks and lift pits on level 6.” Please can it be clarified if reference to ‘public’ car parking is an error and correct the AEE or alternatively provide additional explanation.
10. Page 18 of the AEE describes the Te Urunga Hau (The Urban Room). It describes this to be open 24/7 with the exception of the existing through-site link through the HSBC building which will only be open during business hours. See Image 1 below that indicates the position of the ‘secure line’. Please can the business hours be confirmed so that the degree of permeability and access is understood, including the hours of availability of the proposed public toilets, which are located on the opposite side of the secure line. These hours should match the operating hours of the proposed retail and food and beverage uses as indicated in the documentation.

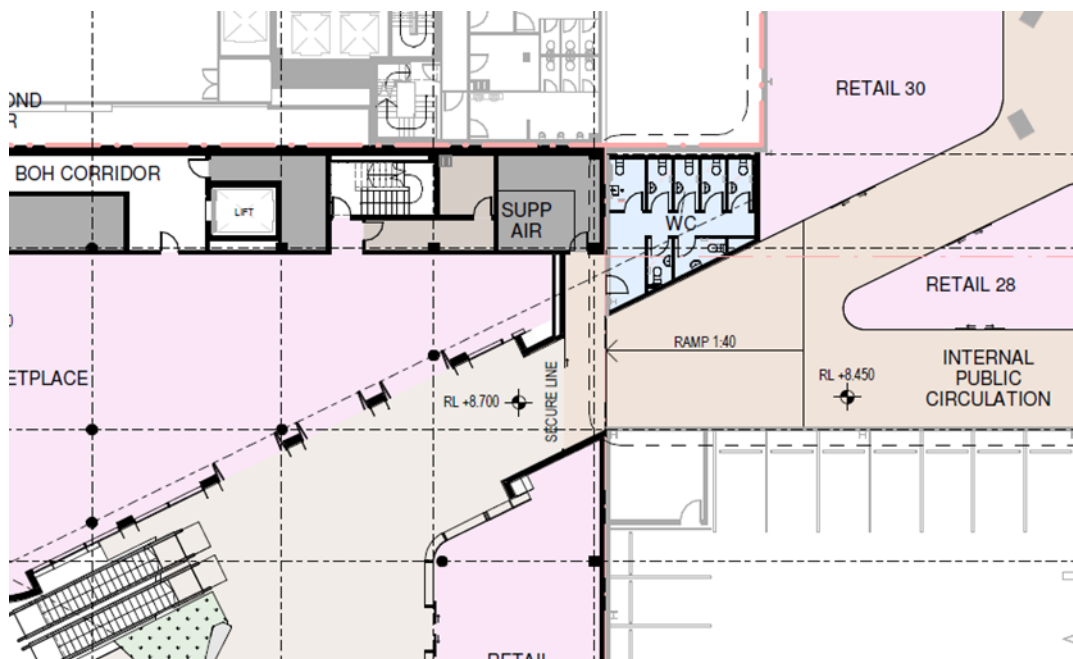


Image 1: Secure line indication

11. Page 2, section 5.2 (last bullet point) of the AEE refers to pedestrian connections within the Site connecting Lower Hobson Street and Custom Street West. Can this be checked and updated to also reference additional connections through to Lower Albert Street.
12. Please update page 23 section 5.3.2 to include the words ‘including demolition’ in brackets to the Construction hours sub-heading and ensure assessment recognises this part of the construction process which is included and applied for as part of this activity.
13. Page 26 of the AEE, Section 5.3.5 Site Works refers to the removal of existing buildings and foundations on site. The removal of the ground floor concrete slab of the existing Downtown Car Park building has notably not been considered in the technical reports. Please can the AEE and relevant technical documents be updated to address this in particular with respect of: noise and vibration assessments (and management plan), traffic effects and construction management. If additional consent matters are triggered as a result of technical assessment please can they be added to the AEE and further assessment provided. Page 33, Section

5.6 of the AEE refers to mitigation measures in relation to Noise and vibration. As requested above, please can addition of an 'Enabling Works Demolition Noise and Vibration Management Plan' be provided.

14. Section 5.4.5 Refuse and Recycling. Please can details (suggested as part of and supporting a waste management plan) be provided setting out what capacity of storage has been calculated as necessary for refuse storage and for recycling storage to support the various uses within this proposal and their operation. Drawing RC10-0005 Rev E (Basement 02) shows relatively small waste storage areas (Waste 1 and Waste 2) for the scale of development proposed. Please also clarify:

- i. It is noted that private collections are anticipated, however please can details of frequency of collections be provided to support the calculations of storage provision.
- ii. How will sorting of recyclable materials be provided for each of the respective uses;
- iii. For the residential apartments rubbish chutes are proposed. Please can details of the management and maintenance of these chutes be provided to understand avoidance of adverse effects in the event this system fails and results in inadequate refuse and recycling arrangements for residents.
- iv. Can it be clarified if food waste storage and collection will be provided for and details provided.
- v. Please clarify if refuse and recycling storage for the retail and food and beverage activities are also to utilise the commercial waste storage areas within the basement and confirm the necessary storage capacity has also been calculated in addition to office areas.

15. Given the scale of the proposal and variety of uses proposed, as well as the vertical clearance restrictions and pinch points requiring mitigation for Laneway truck movements, please provide a Waste Management Plan that includes the details requested in 12 above and provides clear management policies to cater for the different waste management requirements of the various commercial tenancies and residential activities.

- i. The Waste Management Plan¹ needs to also identify, address and cumulatively consider the waste collection demands and operations of the HSBC building / site and the Aon building / site, noting that they share the Laneway. Details of the The vehicles to be used for rubbish collection² to ensure rubbish trucks can satisfactorily enter and exit the site.

16. The Rules Assessment refers to the City Centre Port Noise Overlay being complied with as addressed in the Marshall Day Acoustics Report. Whilst it is noted that there is some overlap between E25 and D25 Standards, the Marshall Day Acoustics Report does not provide an assessment against Standard D25.6.1.1(2) or (3). Please can assessment against these subpoints be provided and confirmation provided that these are met. If these cannot be demonstrated as met, please include a further consent matter pursuant to D25.4.1(A1). It is noted that agreement to Standard D25.6.1.1(6) is confirmed in the AEE.

¹ Note: The Council's Traffic Engineer has also requested the provision of a Waste Management Plan to inform his assessment of effects associated with traffic matters.

² The Traffic Engineer has noted that the Auckland Transport (AT) 7.3m rubbish truck would not be able to access the site owing to the vertical clearance restriction of 3.6m at the site.

17. Outlook space infringements. Please review and if in agreement please add the following Tower 2 Apartments to the list of infringing outlook spaces for principal living rooms, unless the requirements of Standard H8.6.32(5)(d) are provided:

- a. 8.06, 9.06, 10.07, 11.07, 12.07, 13.07 –15.06m
- b. For principal living rooms or bedrooms that have a balcony space between the room and the external wall of the building, the outlook space must be measured from the external wall (Standard H8.6.32(3)(a) and (b). Please can the architectural plans be updated to correct the outlook space with respect of these arrangements. In particular the following units are likely to result in new outlook space infringements for principal living rooms: 14.07 -19.07 (infringement to the principal living room to result).

Please can the consent matters listed in the AEE (page 37 be updated to reflect the information requested).

18. Page 50, section 8.4 and bullet point 3 refers to the majority of apartments being single aspect but having good orientation such that they would receive good solar access. Bullet point 7 refers to 17m separation distance between towers. Please can the cumulative effect of 17m separation distance, single aspect and undersized dwellings (44sqm) be assessed and commented on with respect of the 22 apartments facing east 11.01, 12.01, 14.01 - 19.01 and 22.01 - 34.01. Please provide any supporting information to support this assessment.

19. Can the quality of the unit type HR 1C please be explained, noting that it has a bedroom within the concrete core structure of the tower. Can it be clarified if this will provide an appropriate standard of amenity for occupants with respect of heat / ventilation, proximity to the waste chutes including noise of waste travelling down the building, and the comings and goings of residents dropping off waste.

20. Can it be clarified what capacity of storage space, per residential unit is allocated within the basement noting the reference (AEE page 51) to lack of storage within the apartments being mitigated by basement storage provision. There are 331 lockers, are these to be allocated one per apartment, despite some apartments not needing mitigation of smaller floor areas? The capacity of storage per residential apartment would be useful to understand the quality / extent of the mitigation.

21. Glare: The Rules Assessment states that the proposal will comply with Standard H8.6.29 Glare. Please can it be confirmed and supporting information / statements provided with reference to the materials pallet that is proposed that the buildings will not exceed 20% of white light.

22. In respect to the 121 car parking spaces identified as being currently located in the Downtown Car Park and used by M Social Hotel. Please can evidence of this arrangement being lawfully established be provided in support of this statement and the and the assessment that the effects of re-providing those car parking spaces form part of the existing situation.

23. Objectives and Policies Assessment The lodgement package includes a review of the City Centre Zone Objectives and Policies. Please can further clarification be provided with respect of the below:

- a. With respect of Policy H8.3(3)(a) please can it be clarified what expert assessment is relied upon in making the statement 'A *height transition down from the core of the city centre towards the waterfront (including Viaduct Harbour Precinct to the west) is provided.*'
 - b. With respect of policy H8.3(3) (c) please can it be clarified how the height and form of the proposed towers will be *complementary to existing or planned character* of precincts, noting that the HEHCP has informed *existing character* and is intended to inform *planned character* of the Downtown West Precinct. This has not been considered.
 - c. Please can a detailed assessment of adherence to Downtown West Precinct, objective I205.2(1) be provided.
24. PC78: The IPI objectives and policies of PC78 to give effect to the NPS-UD within the City Centre Zone have legal effect requiring weighting alongside those operative provisions. Please provide a review of the proposed amendments of the objectives and policies for the H8: City Centre Zone under PC78 in support of the conclusions at page 61 section 9.1.1 of the AEE.
25. Basement level 05 floorplan RC10-0002 Rev E indicates a large diesel tank room. Please can it be clarified and information provided based on capacity that the amount of diesel stored is compliant with the thresholds for permitted activities under Table E31.4.3. If the amount of diesel stored is not a permitted activity, please confirm which consent matter is triggered.
- a. Furthermore, permitted activities must comply with the following Standards E31.6.1(1), E31.6.2(1), E31.6.3(1) and E31.6.4(1) please confirm with evidence that these standards are met. In the event a consent is required, please can assessment against the relevant matters of discretion, assessment criteria and objectives and policies of Chapter E31 of the AUP(OP) be added to an updated version of the AEE.
26. Appendix 4E Area Schedules: Please can the GFA schedule drawings be checked for the HSBC building for the following levels as they include areas that should be excluded from GFA calculations as per the AUP(OP) definition in Chapter J:
- a) Levels 3 and 4 have car parking and end of trip (EOT) facilities included in the GFA calculations.
 - b) Levels 5 and 6 car parking has been included in the GFA.
 - c) Level 30 appears to reference 1533m² of office however, the plans are annotated and laid out as plant areas which should be excluded.
 - d) Please can the above drawings and schedules be corrected and updated and the gross floor area (GFA) calculations for these buildings be updated throughout the pack. Please address any subsequent re-calculations needed with respect of Floor Area Ratio (FAR), BFAR and MTFAR.
27. Appendix 4E Average Floor Area Schedules: The 'Public office lobby double height' area of 706sqm on AFA Plan – DTW Level -01 has been excluded from the AFA calculations for podium 1. Please can it be clarified how this meets the definition of AFA in Chapter J, in particular clarify if you consider it to be directly accessible from a street or public open space.

If on clarification you do not consider this definition to be met, please can the AFA and associated calculations for MTFAR be updated?

Heritage Bonus

28. Page 73 of the AEE refers to 10,070m² of heritage floorspace being purchased from a donor site (as reflected in consent matters). Please can details of the donor site that this Heritage bonus floorspace is to be transferred from be provided. This is to demonstrate that reliance on this floorspace is realistic and that there is progress towards recording the transfer of this floorspace on the certificate of title for both the donor and the recipient sites.

Public Open Space Bonus

29. The proposal is seeking to utilise Public Open Space bonuses. Standard H8.6.17 Bonus floor area – public open space (2) states that in order to qualify for the bonus, the public open space *must* meet all of H8.6.17(2)(a)-(g). The Rules Assessment provides no assessment of compliance, nor makes reference to where this is considered in any supporting technical report. Please provide accompanying marked up drawings identifying the 169m² area of public open space that the bonus floor area is being relied upon for. Please provide assessment against Standard H8.6.17(2) to determine if the bonus can be applied for this 169m² of space. Please also provide an assessment against (3) and (4) of this standard.
- a. If the requirements of the Standard are not met, please apply for a further consent matter for failing to comply with the relevant Standard H8.6.17 under C1.9(2) and provide the associated assessment within an updated AEE.

Dwellings Bonus

30. Please can it be clarified where the calculations for the Dwellings Bonus is located within the application documents. The total residential GFA was not clearly apparent in the accommodation schedules. Please also provide the calculations for arriving at the dwellings bonus of 29,752m².
31. The Assessment Criteria H8.9.2.2(6) residential activities (i) residential development is to provide a high standard of internal amenity and on-site amenity for occupants... (ii) notes that: *in order for the bonus floor space to be awarded, residential developments must comply with all of the relevant standards and be consistent with the assessment criteria for residential developments... In some circumstances it may be appropriate to award the bonus floor space where the development (or part thereof) does not comply with the relevant standards. In this instance, the applicant will need to demonstrate that an equal or better standard of amenity can be achieved when compared with a development that complies with the relevant standards.*

As addressed in the AEE and further identified above, a number of the dwellings do not comply with the outlook and the minimum dwelling size standards. Whilst further assessment is noted at 9.2.7 of the AEE, the following assessment criteria is not met: H8.8.2(1)(d) (i) cross ventilation requirements cannot be met (port noise overlay), (iii) it is not clear that rubbish and recycling storage is sized appropriately and accessible for collection; (iv) no

waste management plan is provided. This is needed to justify use of the residential bonus floor area and is requested elsewhere.

- A. To further understand the resulting amenity of the under sized residential apartments, as required by H8.8.2(15) (a)(i) please can a greater level of detail of the 'Standard unit layout' be provided for those dwellings that do not meet the minimum floor area. In particular the amount of storage space that is provided within those dwellings (supplemented by basement storage). Please can additional annotations of storage space capacity be provided within these units and cross sections indicating the nature of the storage that is provided (whether full height or located above head height such as above kitchen sinks etc).

32. Signage. Can it be clarified that no residential units or ancillary residential spaces will have any windows obstructed by signage at high levels.

Wind Report

33. Please can it be clarified if the Hobson Street Flyover was included / in place during the Wind Tunnel Testing.
34. The RWDI Report, Table 1: Pedestrian Wind Comfort and Safety Conditions does not provide the existing wind conditions for a number of the location points in particular points 14-30 inclusive and 83-162 inclusive (there may be others). Please provide an updated RWDI Report that lists out the existing Wind Comfort and Wind Safety conditions. This information is needed to ascertain compliance with Standard H8.6.28(1)(c). Once that information has been provided, please accordingly update any additional areas of non-compliance with this Standard within the listed Consent Matters in the AEE as well as provide an updated assessment of the effects of non-compliance.
35. Further to Table 1 of the RWDI Report noted above, please can wind comfort and wind safety results be clarified. Category C is the comfort level aimed for footpaths and pedestrian locations. Consent is applied for the below:
 - a. Point 33 moves from Category C to Category D. So does point 34. Please add point 34 to the consent matters. Note that point 34 moves to Category D relying on mitigation, otherwise this is Category E which is noted as unacceptable. For point 34 Gust speed is exceeded for winter and annual (safety criteria), please also add this to the consent matters.
 - b. Point 35: Winter and annual gust speed is exceeded (safety criteria) without mitigation.
 - c. Point 61: Summer and annual gust speeds are exceeded (safety criteria) without mitigation.
 - d. Point 98 is comfort level Category E without mitigation and level D with mitigation. Category B is arguably what is anticipated for this location. This is a consent matter. Gust speed is exceeded annually and in summer and winter without mitigation.

- e. Consent is applied for point 160 changing from Category C to Category D. The existing condition is not shown in the above noted Table – please provide that detail.

There are a number of resulting Wind Category for comfort and for gust speeds that rely on mitigation. Without mitigation, some locations enter Category E (unacceptable) and exceed gust speeds (dangerous). The design of the proposal differs to the design that was Wind Tunnel tested. Additionally mitigation run through the Wind Tunnel test does not reflect the mitigation within the proposed scheme.

- 36. Points 33 and 34 indicate a busy pedestrian area. Please provide evidence that the level of landscaping as tested / proposed is feasible to establish in this location (with respect of underground services restrictions and landowner approvals, or ability to deliver raised planting beds that would not unacceptably obstruct pedestrian movement). Note that the Wind Report recommends Pohutukawa trees owing to suitability in exposed locations and being evergreen.

- a. Without evidence that this level of landscaping is feasible and achievable it is requested that the Wind Report be updated to report the Category E results on the corner of Quay Street and Lower Hobson Street (and for winter and annual gust speeds to be exceeded for point 34) as appended with the RWDI report (Figure 2.1B). Alternatively or in addition, please propose alternative mitigation measures that would achieve the stated wind effects / mitigation if the indicated level of tree planting is found unfeasible and provide updated testing to ascertain the resulting wind effects or compliance with the Standard.

- 37. Point 94 is noted to be Category D wind conditions at level 01 on the corner of podium 1. Notably this is in the position of the accessible ramp moving east to west into the site along Custom Street West, at the entrance to the north/south route between the Aon building and proposed podium 01 (with the office lobby and retail entrances adjacent). Re-routing pedestrians away from this location noting the accessibility provisions/infrastructure in this location is not feasible. The AEE (page 45) refers to mitigation measures being explored currently, please provide details of mitigation and clarification/updated results relating to the wind effects that would result.

- 38. The RWDI Report states (page 10): The terraces at Levels 6 and 7 consistently experience elevated wind speeds, falling within Category C to E conditions throughout the year. As a result, these areas are deemed unsuitable for regular use and will necessitate mitigation measures. Please can further information be provided as to what proposed extent of use is intended for these podium levels. As recommended by the Wind Specialist, please provide a Podium Access Management Plan setting out how access to the roof top levels of podium 1 and 2 will be controlled and / or limited to good weather days (as per page 13 of the Wind Report) in the interest of amenity and safety.

Wind Tunnel Testing: Differences to that Design

The Wind Report states that ‘*With the landscaping as tested, there was no exceedance of the gust criteria for all areas around the proposed development*’. The Wind Report at 4.2 states: *Landscaping in the form of mature evergreen trees was found to be beneficial and is an integral part of the mitigation measures strategy.* The Wind Report illustrates at Figure 11 the positions of mature evergreen trees placed for wind tunnel testing. There are also images (Figure 12) that shows the model that was tested that illustrates greater landscaping at

podium levels, including porous screens (not proposed as part of the proposal). The following is of note:

- The proposal was amended after Wind Tunnel testing as described on page 20 of the Wind Report.
 - The canopy to the west of podium 2 was reduced from 3m to 1.8m wide (section 4.1 of the Wind Report);
 - Podium levels 1, 2 and 3 indicate considerable landscaping in Figure 12 of the Wind Report. The RWDI report (Figure 2.2C) appears to have tested at least 12 trees on podium level 1, 24 trees to podium 3 and 7 trees to podium 3 to reach the reported wind conditions. A Nominal number of mature trees are indicated on the landscape plans for podium roof levels 1 and 2. No landscaping details appear to have been supplied for podium roof level 3.
 - The level of tree planting wind tested on the corner of Quay Street and Lower Hobson Street does not look comparable to the landscape proposals and feasibility is not confirmed.
39. The Wind Report states that the results would not worsen having regard to the differences between the tested scheme and the scheme now proposed. Not all differences listed above were commented on in that statement and the level of mitigation tested has not been pulled into the proposals in their entirety. Owing to the particular concerns at key locations (safety – gust speeds) and the fact that Category E performance is generally avoided based on mitigation as summarised above, in light of the high pedestrian movement owing to the east of the site being a major public transport interchange it is requested that:
- a. The updated proposal and changes in mitigation levels be Wind Tunnel tested and the updated results reported in updated RWDI summary tables as per (Table 1) and an updated summary report (Holmes) provided (with associated updates to AEE and consent matters provided); or
 - b. An updated statement from the Wind Tunnel specialist on what impact the reduced canopy extent, reduced landscaping to podium levels and street level (or none if not feasible), lack of porous screens as well as the design changes previously noted would have on the resulting wind conditions. Updated Wind Tunnel testing may be required dependent on review and conclusions.

40. An independent review of the testing results and summary of results may be deemed necessary on receipt of the responses.

41. The AEE at page 46 refers to: *adverse wind velocity and turbulence effects in the surrounding pedestrian spaces can be avoided...* Please can greater clarity be provided as to how that conclusion was reached noting reference to mitigation relied upon and the queries above.

Ground Floor Slab and Foundations

42. The Draft Construction Management Plan (DCMP) prepared by RCP dated 31/07/2024 does not cover the removal of the existing ground floor slab or foundations. Both the AEE and the DCMP refer to 'Enabling Works' comprising a 6 month period but no supporting technical reports address this. Please can the following be provided:

- a) 'Enabling Works' Demolition Methodology be provided for the removal of the ground floor concrete slab and foundations;
- b) A revised Construction Noise and Vibration Assessment (CNVA) that considers the Enabling Works Demolition Methodology and provides an assessment against the noise standards and updated conclusions on affected sensitive receivers;
- c) A revised Noise and Vibration Management Plan to provide for mitigation measures relating to those Enabling Works and revised CNVA;
- d) Updated Traffic Assessment to address the vehicle movements and any additional traffic control changes necessary to accommodate the Enabling works and associated truck movements.
- e) A revised AEE to account for the above including any updated or corrected consent matters and extent of infringements and updated assessment of affects.
- f) Any other matter needing updating as a result of the above.

Noise and Vibration Specialist

Demolition Noise and Vibration

- 43. The estimated duration of demolition noise infringements reported in Table 4 (Downtown Carpark – Demolition Resource Consent, prepared by Marshall Day dated 11 July 2024) are significant. Accordingly, please provide additional information on how concrete cutting works link up with other works (if known) to determine the percentage of time that infringements may occur on a typical day during normal business hours (e.g. 8am – 5pm, Monday to Friday) and during extended hours as referenced in the AEE at section 4.2 (page 12).
- 44. The Kindercare childcare facility located in the Aon Building includes an outdoor play space (on two levels) with line of sight to the subject site. Given the predicted noise levels, the outdoor space may be unusable for long periods of time. Accordingly, please provide additional information to describe specific noise management, mitigation and consultation measures to minimise disruption to the childcare operation. *(Noting that the Ministry of Education guideline noise levels for childcare centre are 55 dB LAeq for outdoor play area and 30 - 35 dB LAeq for sleeping and teaching/learning).*
- 45. Please can the assessment in the AEE be updated to consider affected persons informed by the additional information requested in the two points above.
- 46. The removal of the floor slabs on the ground level of the existing carpark building has not been addressed in either the demolition report and the construction phase noise report. Please can an updated demolition / construction methodology for carrying out these works be provided that informs a revised noise and vibration assessment.
 - a. Please also provide a corresponding update to the AEE with respect of assessment of effects on both the environment and persons as well as general updates to timeframes for works.

Construction and operational noise

- 47. Please clarify whether separate concrete pump(s) are required for the construction at the higher levels and whether the noise has been included in the MDA assessment report of 31 July 2024? It is noted that only concrete truck and pump noise has been assessed.

48. Up to 80 dB LAeq has been predicted at 85-89 Customs St West during vibratory sheet piling. Please can the MDA Assessment report consider how this noise will effect the residents and their ability to sleep as the sheet piling may need to be carried out at night time (up 11pm)?
49. It is noted amenity facilities such as pool, gym etc are located adjacent to residential units within both towers, and it doesn't appear the noise generated by these activities have been considered in the MDA report (31 July 2024). Please can it be clarified whether these noise have been assessed against the E25.6.9 internal noise insulation requirements? If yes, please provide the noise assessment.

Air Quality Specialist

50. The Air Quality Specialist has reviewed the relevant information to Air Quality and has noted: *"The effectiveness of the DMP is contingent on strict adherence to the outlined measures. Given the scale of the project and the urban context, there is a significant risk that dust control measures may not be fully effective at all times, leading to potential air quality impacts beyond the site boundaries."* In light of this, the Air Quality Specialist is of the view that the project must not be classified as a permitted activity under AUP E14. Instead, it is requested that either:
 - a. The dust management and monitoring strategy is enhanced to ensure compliance with the permitted activity standards; or
 - b. An air discharge consent is added to the reasons for consent, which would allow specific conditions to adequately protect air quality during the demolition and construction phases.

Heritage Matters

The Heritage Specialist has concerns relating to the demolition process and how it will be carried out on the Lower Hobson Street footbridge when adjacent to the former Auckland Harbour Board (AHB) building, and also around the details of the reinstated window.

51. The demolition process requires a high-level Heritage Demolition Methodology and Management Plan. Noting the 48-hour road closure and associated traffic effects linked to the removal of the footbridge, please provide additional methodology details confirming the demolition works can be completed within 48 hours. The methodology should include (but not limited to):
 - a. Avoiding or mitigating adverse the heritage effects; and
 - b. can be seamlessly undertaken with make good works (and scaffolding erected immediately / in conjunction) with consideration given to any knock-on pedestrian diversions that may be required to facilitate this; or
 - c. methodology of the extent of works undertaken to result in a safe temporary arrangement for pedestrians below and not result in deterioration / adverse effects to the façade until such time the final make goods are carried out; and
 - d. timeframe for completion of make good works.

Note: the restoration elements on the AHB building with a requirement for detailed drawings and a scaffolding plan submitted before the making good occurs could be secured by condition.

52. Please update the Site Clearance and Demolition Management Plan (Appendix 8) to include in Section 4.1 an assessment of the environmental effects and mitigation regarding historic heritage.

Universal Design Specialist

53. To understand the effectiveness of the public open space and pedestrian connections with wider pedestrian movement, it would be helpful to have a movement analysis for pedestrians from adjoining roads/ precinct into the site and connecting to adjacent streets, lanes, and public transport interchanges noting Policies H8.3(3)(c) and (4), objectives I205.2(2) and (3) and policy I205.3(2) and also the considerations of the assessment criteria for utilizing Public Open Space bonuse assessment criteria (H8.9.2.2(1)(a)(i)).

Urban Design Specialist

54. City form cross sections During the pre-application process following the requests from both the council officers and the Eke Panuku Technical Advisory Group (TAG), the applicant prepared a series of urban cross-sections that illustrate the proposal with its surrounding urban form. (TAG 2 Appendix I, City Form Cross Sections, dated 05.05.2023) This is a very helpful document in understanding how the proposal fits into the existing and future built form of the city centre area. These sectional studies illustrated both east-west planes and north-south planes together with the skyline profiles. Please can updated versions of these studies be provided in order to inform assessment of the proposal's relationship with the surrounding built form and any potential adverse effects.
55. Please can the Harbour Edge Height Control Plane (HEHCP) be indicated on these Cross Section drawings requested in 54. above.
56. Shading diagrams: On page 70 of the Urban Design Assessment Report, it was noted that '*Shading effects on the waterfront due to elevation of parts of the building above the Harbour Edge Height Control Plane are 'negligible' and limited to midsummer at early morning and late afternoon.*' On page 50 of the same document, it was also noted that the assessment did not consider the Harbour Edge Height Control Plane (HEHCP) standard as a permitted baseline.
- Please can the applicant clarify what informed the assessment to consider the effects of the additional height as being 'negligible' while the impact of the building parts above HEHCP is not illustrated.
 - To support the assessment of shading effects, can the applicant please indicate areas shaded by the additional height with a different colour tone to illustrate the shading effects of the height sought beyond the HEHCP.

H8.6.24. Maximum tower dimension, setback from the street and tower separation

57. Maximum tower dimension: Pages 37-38 of the Urban Design Assessment report, state the diagonal dimension of 50.64m for Tower 2. However, it should be measured from the most separate points as shown in Figure H8.6.24.1 below, which is the western façade of the building, which is 50.95m. This additional dimension may seem minimal but the western façade presents some of the most imposing architectural forms.
- Please can the Urban Design Assessment, Rules Assessment and AEE be updated to state the correct dimension.
 - The Urban Design Assessment report does not include Tower 2 in this specific section and concentrates only on T1. Please can the Urban Design Assessment Report be updated to provide assessment of Tower 2 for this Standard.

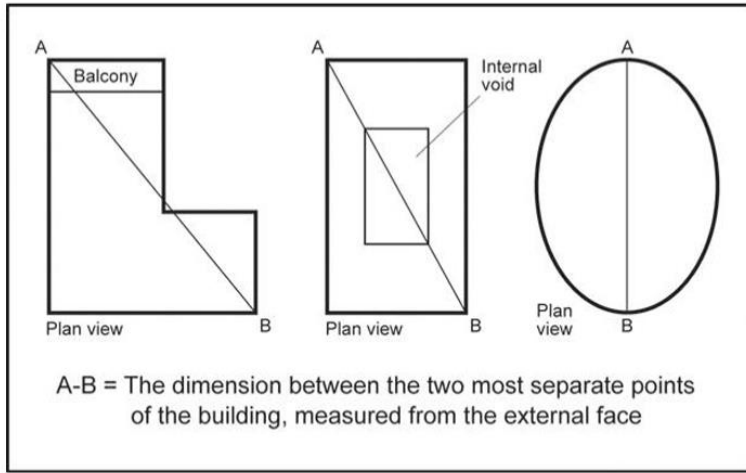


Figure 1. H8.6.24.1 Maximum tower dimension standard.

58. **Tower setback:** For Tower 2, a comparative diagram was included on page 40 of the Urban Design Assessment report with two versions, one with a 4.5m setback and the other with the required 6m setback from Lower Hobson Street. However, the chosen view angle is quite distant to assess the street experience, and the resolution and the level of detail of these diagrams are quite low (Figure 2 below illustrates this). To better inform the assessment of effects, please provide the following to demonstrate how the proposal achieves a consistent human-scaled edge to the street:

- i. a more detailed analysis regarding this reduced setback be provided; and
- ii. additional model render views at a higher resolution based on the series of locations identified in Figure 3 below;
- iii. technical section comparison drawings to assist this assessment being detailed cross-sections at 1-100 or similar scale that include the full extent of the road reserve, kerb line, pedestrian footpath of both sides and the landscape elements on the podium level dimension for both 4.5m and 6m deep profiles. Please include people in the drawings to illustrate the outcomes achieved concerning the human-scale.
- iv. At the pre-application stage, a viewpoint was requested from the corner of Hobson Street and Fanshawe St looking toward the north-east. An updated version of this visual simulation would be helpful for the assessment of the effects of not meeting this standard and resulting effects on the environment. Refer to Figure 4 below.

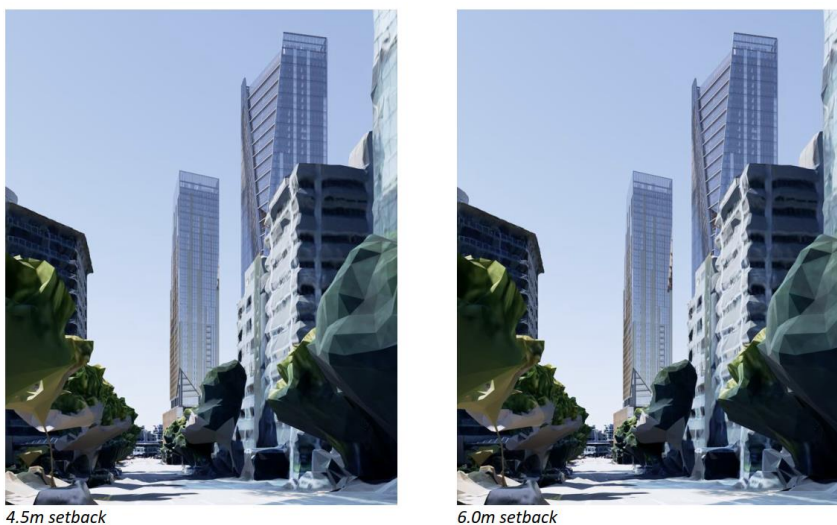


Figure 2 – Figure 2.30 from the Urban Design Assessment.

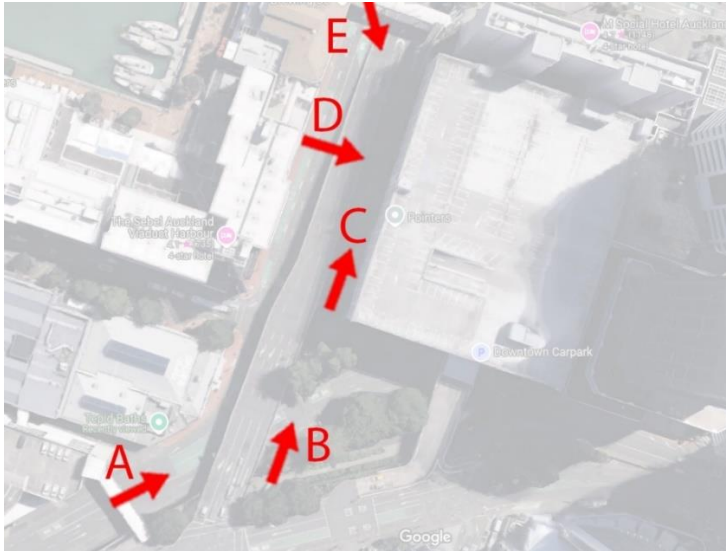


Figure 3. Requested view locations related to tower setback comparison.

14. View from corner of Hobson St and Fanshawe St looking north-east towards the site. Note – view should be amended to represent human scale.

VIEW ANALYSIS HOBSON, FANSHAWE ST

30.



Figure 4. Requested view point.

Detailed elevations and renders - Tower and podium form, and streetscape

59. Please can a rendered version of the elevations that were provided on page RC23 – 0001 for the Architectural drawings at a larger scale be provided. This could be as wide as allowing each streetscape drawing to extend to a full A3 page. Please provide a rendered view of these main streetscapes at a similar quality to the images provided on page 19 of the Architectural and Landscape Report (By Warren and Mahony) with the proposed materiality rendered for the tower, podium and ground levels. These would include the Custom Street West and Lower Hobson Street elevations. This is requested for a clearer understanding of the street edge, the visual separation outcome of the podium and tower levels, and the activation of the ground-level program.
60. Please provide a detailed material schedule comparing the materiality of the towers with the podium levels, similar to the diagrams provided for the comparison of the two towers on page 54 of the Architectural and Landscape Report (By Warren and Mahony) to more clearly illustrate the level of visual differentiation that will be achieved between the towers and podium levels.

61. **H8.6.26 Verandahs:** Please can the following information and clarification be provided to aid the assessment of the adverse effects of not meeting the standard and any potential mitigating considerations:

- a. Can it be clarified if it is intended that the overhangs as shown on the streetscape section of the Architectural and Landscape Report (pg. 32) will provide shelter for pedestrian movement along Custom Street West in the view of the Urban Designer.
- b. Various detailed rendered sectional views have been produced for the internal laneways (pages 28-29 of the Architectural and Landscape Report by Warren and Mahony). Please provide sectional drawings with a similar level of detail at a scale of 1:100 or a similar scale for the street interfaces to Lower Hobson Street and Custom Street West (Requested detailed sections A-F in Figure 6 below) to illustrate the relationship of the proposed buildings with the street including the verandah and canopy provision. Please include the adjacent road reserves, pedestrian footpaths, kerb lines and detailed dimensions indicating space widths and heights for canopies and verandahs. Please include people in the drawings to illustrate the interface's relationship to users and extend of cover provided.
- c. **Non-s92 Query:** During the pre-application meetings, the applicant had previously stated that the verandah standard would be met for the final application, however, no verandah is provided along the Customs Street West frontage and at Lower Hobson Street a 1.8m wide verandah is provided (it is further noted that a 3.0m verandah was wind tunnel tested to Lower Hobson Street). Note also that a verandah cover is required for corner sites (refer Figure H8.6.26.1 Chapter H8 of the Auckland Unitary Plan). In this context, please can it be clarified what led to the decision to not include a verandah in the final version? Along the Custom Street West interface, were verandah options tested by the applicant, including Hobson Street corner and the Aon building frontage?

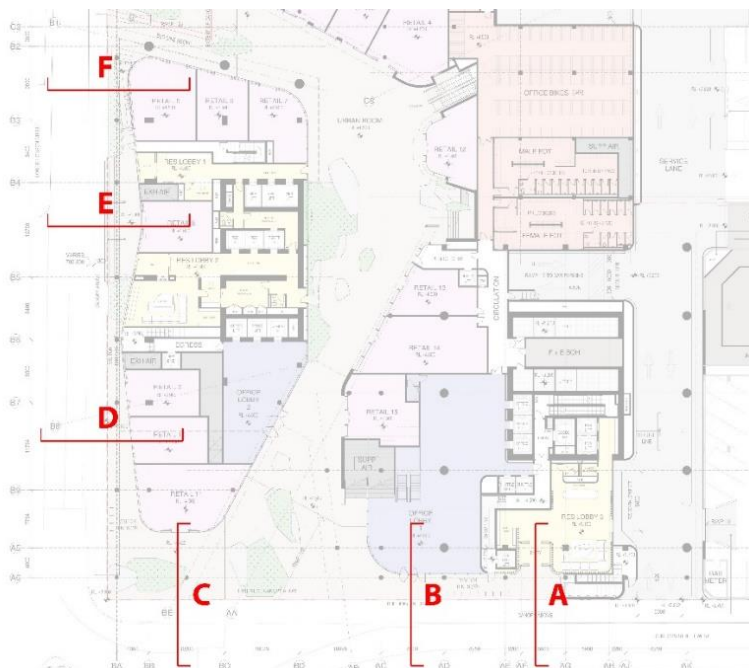


Figure 6. Requested detailed sections.

62. Lighting Strategy: Please clarify the lighting strategy for the site, including but not limited to the lighting of the street frontage (including verandah lighting), and the common areas including the through-site link(s). It is noted that the Rules Assessment states N/A. Please can it be clarified that the Permitted Activity Standards of E24.6.1 are met, noting that the subject site is within Lighting category 4 (high brightness) area.
63. Waste management: Please provide the waste management strategy (noting this has been requested elsewhere).

Landscape Architect

The Landscape Architect requests further information relating to his area of expertise in landscape effects assessment and landscape design. In his review he will rely on the application's Landscape Effects Assessment and appended panoramic photographs and visual simulations (Appendix 6), and the architectural drawings (Appendix 4A) and landscape plans (Appendix 4b) and architecture and landscape report (Appendix 4D). As such, the Landscape Architects Section 92 requests relate to these documents.

Although the application's Urban Design report (Appendix 5) contains comments in relation to landscape effects, as this has not been prepared by a qualified landscape architect or in accordance with a recognised landscape assessment methodology (as guided by Te Tangi a te Manu³), the Landscape Architect will not rely on the report to inform his professional opinions and therefore have no requests for further information in relation to it.

In order to better understand the actual and potential landscape effects of this proposal, the following additional information is requested:

Visual simulation requests

64. Please provide a bound printout of the application Appendix 6 (LVA Appendix) as a colour double page A3-size document for use in field as per the methodology.
65. Please provide a Zone of Theoretical Visibility map to indicate the geographical extent from where the proposal is likely to be visible from.
66. For each assessed viewpoint visual simulation, please provide a separate visual simulation page illustrating shapes of all consented buildings in the existing environment alongside the proposal. This would provide a much better understanding of the proposal's effects relative to the existing environment, and the receiving environment which includes consented but not built towers, as described in paragraph 90 of the Landscape Effects Assessment, rather than relying on a helicopter sketch model (Image I, paragraph 54).
67. Please provide a visual simulation from the Hobson Street / Fanshawe Street intersection (as requested during the pre-application engagement – refer to the below snippet from the 18/08/23 request):

³ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

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30.

Proposed Scheme

Field of view: 40°
Eye height: 168cm
1pm, March



Note: Images for initial visual assessment provided on these pages are generated utilising our in-house city model derived from multiple public sources. A selection of photographic montaged "Visual Simulations" in accordance with the NZLA "BEST PRACTICE GUIDE VISUAL SIMULATIONS BPG 10.2" will be provided to support the resource consent application.



Landscape effects assessment

Māori cultural landscape effects

68. It is understood that the Waitematā and adjacent land have importance to a number of iwi. To better understand Māori cultural landscape effects in accordance with Te Tangi a te Manu⁴, advise how the Eke Panuku Mana Whenua Forum, as referenced in Appendix 2 of the application, has informed the design and the landscape effects assessment. Providing a copy of the Eke Panuku Mana Whenua Forum minutes is likely to assist in this understanding.

Site context

69. To better understand effects on the existing environment (paragraphs 49 – 52), please provide a description of the existing city form's relationship to the Waitematā, and specifically the way in which the Harbour Edge Height Control Plane (HEHCP) enables the existing transition of height down to the Waitematā.
70. In reference to Images D and E in the Landscape Assessment that do not show the Lower Hobson Flyover which forms part of the existing environment, please clarify whether or not the flyover was taken into account in the assessment provided in paragraphs 83 – 84.

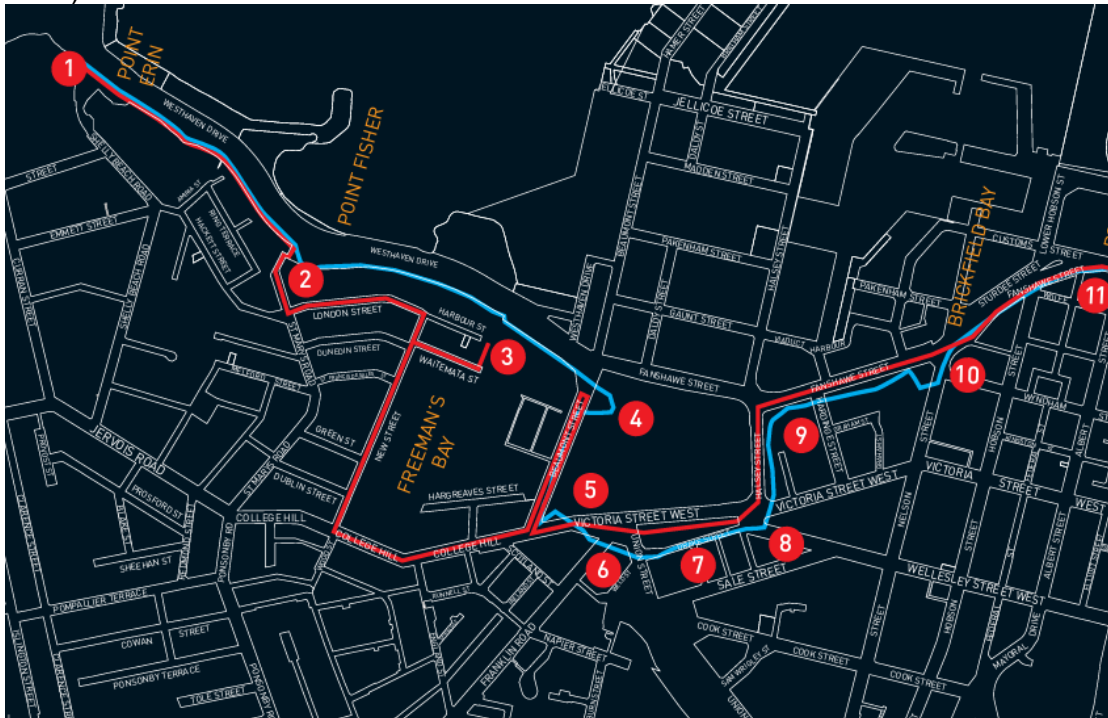
Effects on the form of the city

71. In the heading above paragraph 89 of the Landscape Assessment, please explain why the effects are considered "potential" and clarify what further information is needed for the assessor to reach a conclusion on effects.
72. Please clarify if the proposal meets the criteria to apply the HEHCP exception (H8.6.6.) and therefore determine whether the exception plane should form the baseline to which the HEHCP

⁴ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

infringements should be assessed against. Provide a reference, as relevant, to the AEE or other expert's report of the rationale for why the HEHCP exception rule should be applied.

73. Please describe the landscape effects of the proposal in relation to the HEHCP outside of the site boundaries i.e. what impact will there be on the transition of building heights along the harbour edge as enabled by the control as it applies to existing built form development, including the recently constructed Commercial Bay / PWC tower.
74. In regard to paragraphs 50, 90, 128, 134, 157, 172, 174, 175 and 181 and in reference to the map below included in the *Auckland City Heritage Walks – Auckland's Original Shoreline*⁵ document as referenced in the landscape assessment (or any other records of the historic coastline), please clarify whether the site is i) on the Federal St ridgeline or ii) below and to the north of the ridgeline and iii) within the original coastline (below the historic Mean High Water Mark).



- 16
- Mobility parking available in the Downtown car park.
 - Mobility toilets available in the Downtown Shopping Centre and in the Britomart precinct on Tyler Street, opposite the Events Centre.
- Parts of this walk at either end are quite steep. The central section between Beaumont Street and the base of The Strand in Parnell is relatively level.
- 1840 Mean High Water Mark, plotted by Aranne Donald, Auckland City Heritage Division 1992, from original sources.

75. In regard to the comment in paragraph 93 c) that “*the wider eastern and western façades of T1 are partly internalised to the block*”, please provide an assessment of other vantages, outside of the block, where the wider eastern and western vantages will be visible from, including from places within Britomart and the Viaduct Esplanade (refer to photos below as well as any viewpoint photographs / visual simulations already provided with the application).

⁵ <https://www.aucklandcouncil.govt.nz/arts-culture-heritage/heritage-walks-places/Documents/auckland-city-heritage-walks-original-shoreline.pdf>



Photo 1: View facing west to site from Galway Street, Britomart



Photo 2: View facing east to site from Viaduct Esplanade

76. In regard to paragraphs 92 and 180 of the Landscape Assessment, and in consideration of the transition of building heights enabled by the HEHCP, please explain whether and, if so, how the 'bookend' effect in this site is anticipated by the AUP. Please describe if/how the 'bookend' effect is visually compatible with the effects the HEHCP manages, and also to the transition of heights to the Viaduct compared to the transition of heights that is enabled by the HEHCP.
77. Please provide an assessment of effects in relation to how the proposal will be visually compatible with the heights of existing buildings on Quay Street, as viewed from Quay Street (refer photo below as an example). Please assess the landscape effects of the proposal on the established transition of building heights down to the Harbour edge. Quay Street's sense of scale and amenity.



Photo 3: View facing east to Quay Street from intersection of Viaduct Esplanade and Lower Hobson

78. Please assess the proposal's potential to enable or provide for cumulative effects in other areas covered by the HEHCP i.e. could other sites covered by the HEHCP be developed to similar heights if the proposal were to be implemented and what would be the cumulative impacts of such a scenario?
- a. Further to the above, would the HEHCP still be of relevance i.e. will all the effects that the HEHCP seeks to manage still be able to be managed if the proposal were implemented?

Viewpoint assessment

79. None of the assessment of the viewpoints / visual simulations describe the existing city form (as seen in the viewpoint panoramic photographs) in relation to the existing transition of building heights to the Waitematā that has been enabled by the HEHCP, nor provide any assessment of effects relating to the existing transition. Please describe the existing transition of building heights to the Waitematā in these views and provide an assessment of adverse effects on the established transition in relation to the following representative viewpoints:

- Viewpoint 2: Queens Wharf
- Viewpoint 3: Quay Street
- Viewpoint 4: Viaduct Esplanade
- Viewpoint 5: Karanga Plaza Steps
- Viewpoint 6: Brigham Street / Hamer Street (Wynyard Point)
- Viewpoint 7: Stanley Point
- Viewpoint 8: Takarunga / Mt Victoria, Devonport
- Viewpoint 9: Ōkahu Bay Wharf (Ōrākei)
- Viewpoint 10: Tamaki Drive at The Strand
- Viewpoint 12: Anglesea Street / Ponsonby Road
- Viewpoint 13: Shelly Beach Road overbridge
- Viewpoint 14: St Mary's Bay Beach
- Viewpoint 15: Sulphur Beach Reserve
- Viewpoint 16: Harbour View Beach Reserve, Te Atatu Peninsula

80. Explain how the obstruction of views from the Sky Tower's observation deck responds to the HEHCP purpose to "*maximise views between the harbour and the city centre*"⁶, and given this view is representative, describe whether the parts of the proposal infringing the HEHCP and

⁶ Auckland Unitary Plan Operative in part - H8.6.5. Harbour edge height control plane

the HEHCP exception will create a similarly obstructive effect from any other private views and public views i.e. publicly accessible lookouts / viewing platforms in other towers.

81. In consideration of paragraph 93 c) under the heading *Slenderness*, please provide an assessment of the effects of the “*wider eastern and western facades*” in relation to the viewpoint 4 visual simulation and photo 2 in this memo from the Viaduct Esplanade.
82. In regard to the commentary quoted below (paragraph 123 of the LA report) please provide an assessment of the *sequential experience* of approaching the site along the Viaduct Esplanade from the west, and determine whether more of the sky space that will be occupied by the proposal will be present in views within this sequence.

“Given the proximity of the view and the scale of the respective towers, the main focus of the view in this area is within the Viaduct harbour at ground / sea level. Similar to the view from St Patrick’s Square, although the eye will be drawn up to the proposed buildings, only the lower levels will be ‘naturally’ seen, e.g. one would need to draw their angle of view up to see the upper levels”.

83. In regard to the Karanga Plaza Steps viewpoint, please describe what is meant by “*relatively slender*” (paragraph 129) i.e. relative to / comparative with what other towers in the view?
84. Further to the above request for a visual simulation from the Hobson Street / Fanshawe Street intersection as requested by the Urban Design Specialist, please provide an assessment of effects from this viewpoint giving particular regard to the effects of the reduced setback on the relationship of the towers to the Harbour, giving particular regard to the heights and setback.

HEHCP assessment criteria (for Restricted Discretionary activities)

85. In regard to paragraph 182 c), provide an assessment of any other views that will be affected by the parts of the proposal infringing the HEHCP, including private views and public views from towers i.e. publicly accessible lookouts / viewing platforms, including the Sky Tower.
86. In regard to paragraph 184, please explain how the proposal will be visually compatible with the existing transition of buildings heights to the Waitematā that has been enabled by the HEHCP.
87. In regard to paragraph 185, please describe the effects of the infringing parts of the HEHCP on the waterfront’s sunlight admission and shading at street level and at public gathering places. Provide a reference being relied on to reach this conclusion if this assessment is provided in another expert’s report.
88. In regard to paragraph 186, provide an assessment of the effects of the reduced setback on Lower Hobson Street on the streetscape scale and visual harmony anticipated by the AUP.

Landscape plans

89. Whilst it is noted that a planting strategy is provided in Appendix 4D from page 26 and roof gardens from page 44, notwithstanding this, please provide a planting layout and an itemized schedule of plant and tree species to be used in the urban room to help determine the appropriateness and the ability of plants / trees to thrive in the space.
90. Please advise how many hours of sunlight that the proposed trees in the urban room will receive throughout the year and provide arboricultural expert advice as to whether these trees will be able to thrive within the urban room conditions.
91. Please provide a planting layout and an itemised schedule of plant and tree species to be used on the podium roof to help determine the appropriateness and the ability of plants / trees to

thrive in the space. Provide arboricultural expert advice as to whether trees on the podium roof will be able to thrive within the exposed conditions.

Architectural drawings

92. Drawings RC80-0001, RC80-0005, RC80-0008, RC80-0009 and RC80-0012 do not show the Lower Hobson flyover and show other changes to Lower Hobson Street and Sturdee Park. It is noted that the removal of the Lower Hobson Street flyover does not form part of this proposal. Please clarify if changes to Sturdee Park form part of the application. If not, clarify on the drawings the extent of the changes to the existing environment shown that are not within the scope of the application (including the Hobson Street Flyover).

Development Engineering including Geotechnical

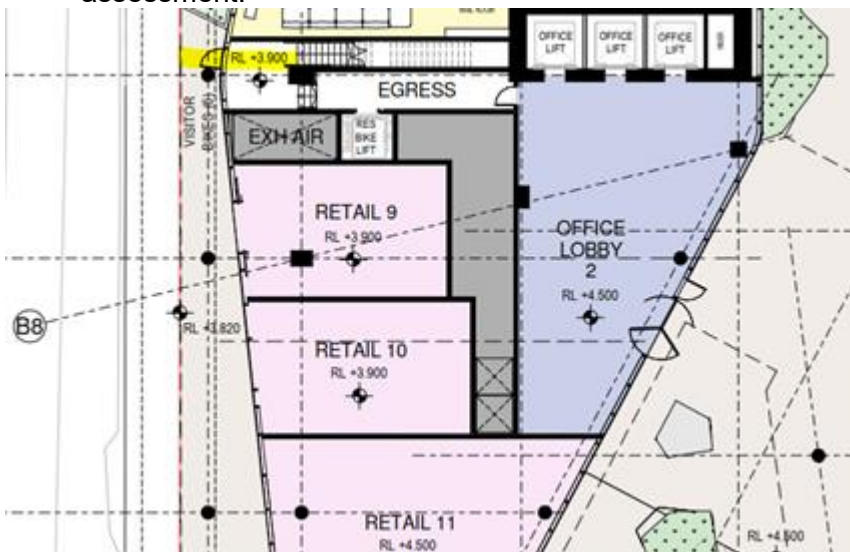
Wastewater

93. The Infrastructure Report references in Section 1.1, Tower heights of 41 and 52 levels and plans from May 2024. The lodged plans illustrate tower heights of 45 and 56 levels [including podium] and are dated: August 2024. These supersede the plans relied upon for the Infrastructure Report. Please address this discrepancy and provide updated wastewater calculations for peak weather flow and capacity assessment (if appropriate).
94. The executive summary in the Infrastructure Report references new connections to Custom Street West and Lower Albert Street however the plan provided in Figure 3.3 shows new connections are proposed from Lower Hobson Street and Sturdee Street. Please clarify the discrepancy.
95. It is understood there has been discussions directly with Watercare Senior Development Engineer, James Shao and Development Engineer Steven Lopati for this proposal. Please provide copies of this correspondence.
96. Due to the scale of development, the Council would require Watercare to provide input to the assessment. The necessary capacity calculations and drainage plans have been provided within the Infrastructure Report. However please can the applicant fill the attached (Appendix 1) form to enable the Development Engineers to send through to Watercare for assessment.

Flooding

97. Please provide a clear plan and drawings to show the location and details of the proposed flood barriers referenced in Section 2.2 of the Flood hazard and risk assessment report.
- a. While it is acknowledged that these are to be refined with subsequent design stages, details of what is proposed and where is still required for E36 assessment to demonstrate what and how overland flow and flood plains are to be managed and mitigated.
 - b. If the proposed flood barriers are permanent, please present these clearly in the landscaping plan for consistency.
98. If flood barriers are temporary structures requiring monitoring for severe weather events to instigate installation, and maintenance to ensure that they are in good condition for use, please advise.
99. Please clarify what measures are to be implemented for the lack of adequate freeboard for retail units 9 and 10 e.g., flood resilient design to minimise operation downtime, closing of the store during severe weather events, flood barriers to prevent entry of floodwaters into the retail store, alternative entry/exit from the retail store etc.

100. Please provide calculations and parameters used to produce the outputs for the pre and post development conditions (with 3.8 degrees climate change).
101. Please confirm if a Flood Management Plan is proposed to manage the response to severe weather events. If so, please provide some high level comments on expected content e.g. monitoring of severe weather events, maintenance of flood barriers and any alarms, etc that could then be secured as a condition of consent. Please include this in the hazard risk assessment.
102. Plans showing the distribution and depth of floodwaters and overland flows have been provided. Please provide plans showing the velocity of flows for the pre and post development condition with 3.8 degrees climate change.
103. In order to assess the risk of flows to persons and vehicles, assessment is necessary on the depth and velocity of flows. Information regarding the depth of flows has been provided, please also provide the anticipated velocity of flows.
104. The risk assessment is based on 40 mm of floodwaters in the retail spaces 9 -10 (3.9 m RL) however this appears to rely on point 6's data (3.94 m RL). Point 5 appears to be located closer to retail spaces 9-10 and reports a 3.95 m RL for the top of flood level and would result in a 50 mm depth of floodwaters in the retail space. Please clarify how the 40 mm was deduced for the risk assessment or update the assessment.
105. The documentation states that there is up to 20 mm increase in flood depths as a result of the proposal. Please provide further commentary on the effects it may have on the road network for public users and emergency service vehicles in a 1% AEP event.
106. Noting the depth of floodwaters on Lower Hobson Street to be in the order of 0.5m which is of significant risk to persons, please provide an assessment for the safety of persons exiting the site to Lower Hobson Street or a clear plan showing alternative evacuation route from the site to ensure that persons do not encounter unsafe hazards. Please note that safe evacuation routes must be practical, legally available, accessible and safe.
107. It is noted that there appears to be an egress which may also be affected by floodwaters which has been excluded from the risk assessment. Please include this in the risk assessment.



108. Please confirm if there are any changes to the overland flow path entry and exit point locations as a result of the proposal.

109. Please confirm if there are any changes to the capacity of overland flows as a result of the proposal.

Earthworks (excluding erosion and sediment control)

110. It is noted that water sprinklers and dust control measures are proposed during demolition works. Please provide dust control measures for during earthworks for assessment against E12.6.2(5) and E12.8.2(1)(b).
111. Please provide a clear isopach earthworks plan to show the location, distribution and depths of proposed earthworks. This should show the location of lift pits and water tanks which are deeper than the lowest basement level and confirm the maximum excavation depth.
112. The Burland Scale includes a number of assumptions including that the building has not historically endured deformation and omits the age of the structures whereby relatively small amounts of ground settlement may result in effects otherwise not anticipated. Therefore, we require assurance that the assumptions are met or the site-specific structures and services have been considered with their existing condition, age, depth and construction type. Therefore, please provide comments on the construction type, depth, condition and age of the neighbouring buildings, paved surfaces and public and private services which are affected to justify the assessment of effects. This assessment can be undertaken in collaboration with a structural engineer.
113. Please provide endorsement from a structural engineer for the proposed alert and alarm trigger levels in section 3.1 with consideration to total and differential ground settlement effects (not just dewatering).
114. Please clearly identify the investigation logs relied upon for the geological sections. This is different to ascertain from the Geotechnical Layout Plan if relying on the investigation logs from Appendix D due to multiple labels on the same log e.g. page 87 of the PDF appears to be labelled as Bore 12 64, BH_TT66665 and BH_64335 however none of these are referenced in the Geotechnical Layout Plan.

Groundwater Specialist

115. Please undertake an assessment of the proposed activity against AUP (OP) Standard E7.6.1.6 (1 to 3), which is missing from Table 5.1. of the T & T report.
116. It is unclear where the combined settlement profiles, presented in Appendix H of the T&T report, are located. Please identify and annotate the locations of the critical cross-sections on Figure 1 – The Geotechnical Layout Plan. Critical cross-sections are required considering the deepest excavations, proximity to adjacent buildings (including podium parking structure for HSBC building), structures and public/private services.
117. Please correctly annotate the locations of neighbouring buildings, structures and services on the geotechnical cross sections and combined settlement profiles. Foundation types and depths and basement levels of buildings/structures should be shown for clarity and foundation / pile layout plans are to be provided from Council Property files. These plans are to be annotated with critical information for all neighbouring structures/buildings. Any existing public and private services should also be annotated on the cross sections at the correct depth. We note that the following buildings/structures/services/roads have not been assessed:
- a. HSBC Tower parking podium, located directly adjacent to the northern part of the eastern site boundary.
 - b. The Lower Hobson Street flyover, located approximately 8m west of the western site boundary,

- c. Gas pipelines, shown on the Dry Services plans appended to the T&T Infrastructure Concept Design Report, between the excavation and Customs Street West.
118. It is noted that different values for the Effective Elastic Modulus and Effective Poisson's Ratio have been used for the Section 1 and Section 2 Seep/W analyses. Please clarify why different values have been adopted for the same soil units across the models, or revise the analyses accordingly.
119. It is noted that groundwater flow in a northerly direction may be impeded by construction of the basement, however T&T consider the potential for groundwater mounding to be low, with groundwater mounding to be considered at the detailed design stage. Groundwater mounding may result in adverse effects on any nearby basement structures (such as the two level drained basement at HSBC Tower and the drained basement at West Plaza at 1-3 Albert Street) and must be assessed as part of this application. We note that the high-level mitigation measure of installing permeable trenches around the wall perimeter would likely result in additional groundwater drawdown and consolidation settlement which has not been addressed. Please provide a detailed assessment of groundwater mounding and assess the effects of any proposed mitigation measures should they be required. In addition please provide an assessment of shadow effects of the proposed basement on the foundations and any basement at the MSocial Hotel.
120. The WALLAP output for Section 3, Option 1 (sheet piles terminating in the ECBF) has only been undertaken to the toe of the sheet piles. The assessment does not include any relaxation/movement within the ECBF rock below the toe of the sheet pile or lateral deflection of the future proposed permanent wall. Please revise the assessment of Section 3 to include the effects of the open excavation to the full basement depth. We note that WALLAP may not be appropriate for this assessment and finite element modelling, such as PLAXIS, may be required. We also note that the Modulus of Elasticity of the concrete diaphragm wall has been used in the Section 3 WALLAP assessment rather than the value for the sheet piles which is provided in Table 4.8 of the T&T report. Please ensure the correct Modulus of Elasticity value is used for the assessment and revise accordingly.
121. It is noted that no assessment has been undertaken for the proposed Section 3 diaphragm wall (Option 2). Please undertake an assessment of the diaphragm wall option, if it is still proposed.
122. It is noted that the proposed basement wall for Design Section 2 and Design Section 3 – Option 2 is dependant on ground anchors. Please provide written approval from Auckland Transport for the ground anchor installation within the road reserves of Customs Street West and Hobson Street.
123. Please provide additional assessment / including modelling and confirmation of the adequacy of the groundwater cut-off by only a minimum of 1m embedment of the sheet pile wall along the southern and the south portion of the eastern boundary in to ECBF rock.
124. Please undertake the assessment of damage to buildings using the Damage Classification after Burland (1995) and Mair et al (1996) which includes the "*Very Slight*" description of the degree of Damage and refers to Limiting Tensile Strain and update Section 4.5 of the T & T report accordingly.
125. As a result of the response to the queries 115-124 above, please revise the assessment of effects on neighbouring buildings, structures (including driveways, accessways and roads) and public and private services. The combined settlement profiles should also be revised as necessary and calculations provided for the **maximum** differential settlement values annotated on the combined settlement profiles under neighbouring buildings, structures (including driveways, accessways and roads) and public and private services.

126. Geological Section 5, appended to the T&T Geotechnical and Groundwater Assessment report has been incorrectly labelled Section 4. Please revise accordingly.
127. Please consider adding the following to the Construction Monitoring and Instrumentation Plan or provide justification as to why they are not required:
- i. A groundwater monitoring piezometer (MW05) near the south-eastern corner of the site to monitor the effects of groundwater mounding,
 - ii. Additional ground settlement pins beyond the northern and eastern site boundaries,
 - iii. Settlement pins on the Lower Hobson Street flyover structure.
128. It is noted that pre and post-construction internal condition surveys are proposed for the MSocial, HSBC Tower, AON Tower and Tepid baths buildings. Please clarify:
- a) the extent of the proposed surveys and show this on the Construction Monitoring and Instrumentation Plan.
 - b) include the nature and extent of the external survey of the Lower Hobson Street flyover structure and road pavement.
 - c) why (in Table 6.1 of the draft GSMCP) 'no internal surveys are proposed of 204 Quay Street and the Watermark Building at 85 Customs Street West'.
129. On the Construction Monitoring and Instrumentation Plan please identify the sections of stormwater and wastewater pipes for pre and post construction condition surveys. Also show the details of the nature and extent of the proposed surveys for the gas pipes (shown on the Dry Services plans) and water mains.
130. Please revise Table 3.1 of the GSMCP to refer to Groundwater Alert Levels 1 and 2 rather than alert and alarm trigger levels. Alarm levels are not appropriate for groundwater level monitoring.
131. Please revise the alert and alarm values for building settlement pins in Table 5.1 of the GSMCP to reflect the 70% of the predicted total settlement and the predicted settlement as shown on the revised settlement profiles for MSocial, HSBC Tower, HSBC podium car park structure, AoN Tower, the Lower Hobson Street flyover structure, 204 Quay Street , Tepid Baths and the Watermark Building at 85 Customs Street West.
132. It is noted that the Inclinator alarm trigger levels, provided in Table 4.1 of the GSMCP, are higher than the assessed retaining wall deflections (e.g. 35 mm Alarm level vs 24 mm predicted deflection). Please revise the alarm and alert levels to reflect the maximum assessed retaining wall deflection which is the basis for the assessment of effects on neighbouring buildings/structures.

Traffic Engineering

133. The S92 Request for Further Information related to consent reference: LUC60435285, dated 27 August 2024 and specifically numbers 22-31 of that letter are applicable to this request. Subject to the response to those requests, there may be follow up requests in relation to the matters listed below relevant to this consent application:
- Construction hours
 - Heavy vehicle routes
 - Pedestrian and cyclist safety assessment and diversion mitigation
 - Local access assessment
 - Contractor parking assessment and mitigation

- Vehicle tracking of construction vehicles is similar to demolition.

Temporary activities (E40)

Note: The Construction Traffic Assessment refers back to the demolition details for the pedestrian and cyclist safety assessment and diversion mitigation. This is of concern as the demolition is only for one year with particular stages lasting varying lengths of time (Stage One being 48 hours), however this consent is for multiple years. Further information is required to understand the effectiveness of the mitigation especially due to the long closure and diversion periods.

134. The ITA at page 61 (Table 16) provides details of average truck movements per day during earthworks. It is stated that the volume of heavy vehicles daily and hourly will ultimately be dependent on the methodology the contractor adopts. Please can details of the likely range of truck movements per day be provided and a sensitivity test be carried out for the high range of truck movements, in addition to the average to enable the potential effects to be understood and inform any additional potential mitigation requirements?
135. During a site visit (04/09/2024) Signage restricting vehicles over 10.3m long from turning right into Lower Hobson Street was viewed. Please confirm that the heavy vehicle routes proposed during demolition and construction will comply with this restriction. Please identify measures to ensure this restriction is adhered to.

Car Parking

136. Access and Maneuvering (E27.6.3.3). The Vehicle Tracking assessments are provided as Appendix E of the Traffic Report. Sheet 12 of 16 Basement 02 Vehicle tracking – B85 Design Vehicle (Drawing number: PREP002-QS-SW01-W Rev A) with snip copied below (Fig 1) shows a clash with a structure (identified with the red circle). The blue annotation below illustrates a segmented / non-continuous tracking curve. Please provide tracking curves that are continuous and do not clash with structures.

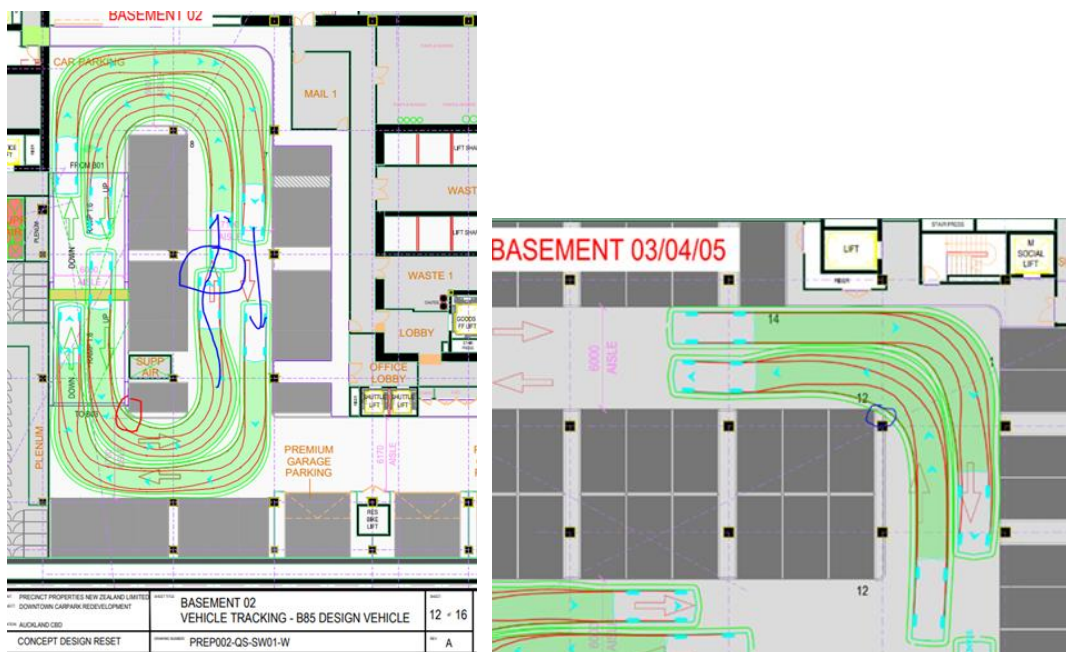


Figure 1 Figure 2

137. Sheet 14 of 16 Basement 03/04/05 Vehicle Tracking – B85 Design Vehicle (Drawing number: PREP002-QS-SW01-W Rev A) with snip copied above (Fig 2) shows the tracking curve clearance clashing with a structure. Please amend the tracking curves or identify design changes that provide mitigation for this clash.
138. Passing Bay – Further to the above points, subject to the response to the vehicle tracking curves at the bends, further information may be required to assess whether a passing location/bay may be required as further mitigation.
139. Vertical Clearance (E27.6.3.5). Please provide vertical clearance cross sections for the existing (HSBC site) section of the proposed Laneway, clearly displaying the vertical clearance restrictions mentioned in the documentation (AEE and Integrated Transport Assessment) as being 3.6m.
140. The Traffic Engineer has vertical clearance concerns with respect of the servicing arrangements (Section 8.4.2 of the ITA) for the proposed development, noting the existing Quay Street entrance (beneath the HSBC development) has a 3.6m vertical clearance restriction and the proposed Laneway entrance from Custom Street West will have a 2.9m vertical clearance restriction. For example, an average Auckland Transport (AT) 7.3m rubbish truck has vertical height of 3.7m. With this in mind, please clarify and demonstrate that the current infringing vertical clearance height (stated as 3.6m) can accommodate an 8.3m truck or provide mitigation or address this concern through design changes.
141. Please also provide details as to how furniture trucks and waste collection vehicles will be able to access and service the site owing to the considerable residential proportion of the proposal.
142. Please can it be clarified how emergency service vehicles (Fire Trucks) will attend the site owing to the vehicle access restriction and vertical height clearances (E27). It is also noted that PC79 introduces a reference to emergency vehicle access. Please can it be clarified if fire tender access is restricted to the Laneway. If it is, please clarify if this arrangement is of concern to the New Zealand Fire Service or provide evidence that emergency responder access is suitable.
143. Whilst the AEE and the Integrated Transport Assessment refers to a Servicing Management Plan providing mitigation for the vertical clearance restriction, please provide a Servicing Management Plan to further understand how adverse effects of the reduced vertical height clearance will be avoided, or mitigated. This should provide details of anticipated servicing related to frequency, number, time of day and any conflict with peak periods. This information should also include a section on existing servicing demands for HSBC and Aon buildings to understand the full demands on the redesigned Laneway.
144. Please can details of existing consent conditions relating to servicing, car parking or other vehicle access arrangements in relation to the HSBC, Aon and M-Social buildings / sites also be provided and the effects of any changes to those conditions considered within the ITA and AEE.

Note: Whilst this may be an existing situation, the existing activities using the service lane can leave via Custom Street West (potentially). It is unclear what the existing or proposed waste management arrangements are.

145. Bicycle Parking - Please show the short stay bicycle parking spaces on the site plan and provide details of the bicycle parking types and specifications for both short stay and long stay bicycles.
146. Accessible car parking - Please provide an assessment against the PC79 accessible parking rates and ensure that the stated / illustrated dimensions comply with PC79. Please update the drawings to illustrate compliance with PC79 or add as a consent matter with associated assessment of effects.
147. Loading Space – The ITA at section 8.4.3 (final bullet point on page 42) describes the pinch point at the service lane, meaning one way operations will need to be in place when a truck is exiting the loading bay. Please provide a draft Servicing Management Plan documenting the operation of the loading dock booking system as described at section 8.4.3 (final bullet point on page 42 of the ITA). Please provide additional explanation as to how busy periods will be determined and how truck movements will be scheduled to avoid those busy times. Can it be clarified who will have day to day responsibility for this booking system. Noting that in the event that the consent is granted a monitoring condition would be expected to ensure compliance.
148. Section 8.4.3 of the ITA makes reference to convex mirrors to provide some mitigation for the one-way service lane functionality. Please locate the convex mirror(s) on the architectural plans.
149. Signage – Please can it be clarified if the signage indicated on the building facades, in particular on the Custom Street West and Lower Hobson Street podium buildings that lines of sight for drivers of vehicles will not be interfered with in particular with respect of traffic lights.
150. SIDRA Modelling Results - Please provide all SIDRA modelling assumptions, SIDRA parameters / SIDRA detailed results (movement summary and phasing used). Has the SIDRA model been calibrated to the existing / baseline traffic receiving environment for local intersections (phasing / timing and other aspects), and how was it applied to the development of the model?
 - a. Subject to the discussion / information provided in response to the query / further information requested with respect of trip rate assumptions, further questions / updated modelling may be requested.

Auckland Transport

Due to the overall approach in consenting strategy, many of the request for further information that were made in the context of the land use consent described as LUC60435285 have been reiterated for the purposes of this application with minor amendments, where applicable. These are requests for further information that will help to better understand the proposal, including its effect on the environment and the ways any adverse effects might be mitigated.

Modelling & effects upon the transport network

151. Like the supporting assessment provided in LUC60435285, limited information has been provided in order to assess how any existing trips generated from the DTC are to be redistributed into other parts of the network. There is a concern that the condition of the

receiving environment has been understated, which means that there may be factors in play that could skew the results of the assessment, including the modelling. In particular:

- a. There are a number of leased car parks within the DTC, which belong to the HSBC and/or Aon buildings nearby. It is understood that there may be existing lease agreements in place that require the applicant to find alternatives to service any surrounding building(s), both during and after construction;
- b. Whilst it is recognised that the DTC is proposed to be closed, it does not necessarily mean that the current movements associated with the use of the DTC will all no longer travel to the city. More appropriately, it is likely that they will be simply displaced to another car park within the City Centre;

Auckland Transport acknowledges that the applicant has identified in that they have included the DTC trips and distributed them in accordance with a methodology guided by AFC. However, no information has been provided in order to confirm which methodology was selected and where the assessment has allocated any resulting trips. Subsequently, please provide an updated assessment, inclusive of revised modelling, that takes into account the aforementioned points in order to characterise what will happen to the existing trips to the DTC.

152. The effect on buses has not been specifically reported within the applicant's Transport Assessment Report ("TAR"), other than a high-level comment that the bus lanes protect buses from additional delays. However, it is considered that there will not only be delays in terms of intersections but also because of having to reroute buses due to road and/or lane closures, which are both proposed across various stages. It is noted that the modelling report states that each bus route has been coded separately. Subsequently, please undertake an assessment of the pre and post development journey times associated with each bus route in order to understand the anticipated delays that will result from the proposed demolition.
 - a. As part of the response to the above, the supporting assessment must include details on how any adverse operational effects and/or delays will be avoided or mitigated in regards to any proposed relocation of existing bus layovers and out of service buses, noting that this will have a flow on effect to the start of any service(s) and overall function of the bus network;

Advice Note:

For the avoidance of doubt, a response to Matter (2) should take into account the information needed to address the additional assessment requested in Matter (6) of this memorandum.

153. Further to the above, please undertake additional assessment on the total effects on journey times for all vehicles in each identified scenario. The assessment should not solely focus on specific intersection delay(s), as currently identified, as it is also about total journey times.
154. The diagrams included within the TAR shows that in Stages (2), (3), & (4) in the PM peak traffic rerouting from northbound Albert Street to Swanson Street and onto Federal Street and then onto Fanshawe Street with increases in volumes on the northern end of Federal Street of 200 vehicles. This could be traffic avoiding the Albert Street / Fanshawe Street intersection. Please justify whether this rerouting is realistic and provide further supporting assessment in order to demonstrate the control measures to achieve this proposed rerouting. We are concerned around whether this could affect the reported delays if traffic remains on Albert Street rather than taking the route indicated in the model.

155. Trip generation for the office component of the development is based on trip rates per car parking space and a trip rate per 100m² GFA which relates to visitors / deliveries. These rates are based on a rate from the Wynyard Quarter Precinct. This trip generation does not take into account any vehicle trips that would be generated by the development that would not park on site e.g. office workers that have not been allocated an on-site car park and that have driven to work. Furthermore, Wynyard Quarter is subject to constraints on the total PM peak hour trips that are permitted. This may be reflected in the trip rates used in this precinct. Please provide further justification of the stated trip rates, including providing a sense check with other CBD office based developments and should take into account the fact that workers are able to park off-site.
- a. Further to Matter (155), please update the traffic modelling with revised trip rates and taking into account additional trips associated with the development that may be distributed across other parking buildings.
156. Similarly to LUC60435285, the circulation of construction vehicles is still proposed come in to the site from the North and then exiting out to the west. By comparison to LUC60435285, there is a significantly higher number of construction vehicle movements (on average) that will be generated by the required enabling works / redevelopment of the subject site. However, there is little information available to understand the programme of works after year (1) in terms of the required approach to managing the surrounding network. The Construction Traffic Management Plan (“CTMP”) suggests that control measures similar to Stage (3) may be imposed. However, for a project of this scale and duration of construction we require more certainty around the suitability of the construction management measures in order to understand what the resulting adverse effects upon the surrounding network, particularly in terms of the operation of the bus network, may be.
- As such, please provide further details and supporting assessment of the programme of works following completion of demolition, commenting on what kind of management measures will need to be in place to facilitate the proposed construction. This response must include, but not be limited to, an outline of the necessary road closures; required construction laydown facilities; positioning of plant / crane location(s); any alternative routes for bus movements around the site and/or wider network closures; locations of temporary access to the site; how the existing AON and HSBC buildings will continue to be accessed; and an updated CTMP taking into account the aforementioned matters.
157. It is understood that there is a current agreement for parking for M Social within the DTC. This parking will be displaced during the demolition and construction phases of the project (7 years). Please provide further details on where the required parking will be displaced to and whether this will result in additional movements to M Social (for example, valet parking from the hotel to the car park and back again). The response to this matter should take into account any resulting adverse effects on the operation of Quay Street, particularly the eastbound bus lane, and how these will be avoided or mitigated.

Staging and proposed diversion routes / lane closures

Matters (158-159) below are predominantly focused on the proposed management approach to the first year of construction, noting that no detailed information is available at this point in time, outside of a suggestion that similar controls to Stage (3) could be used, after the completion of demolition. In this vein, further information request may be made upon a response to Matter

(156) once a more detailed programme of works / CTMP draft is available for peer review.

158. As noted above, there is limited consideration around how the proposed works will provide for the continued service of buses and/or suitable access to nearby bus stops and supporting infrastructure. Alternative routes for buses should be provided, including how they would access their current bus stops or where alternative bus stops are to be located. This information is required to understand the effect on buses and to ensure that there is an acceptable solution. Specific traffic management measures may be required. For instance, during Stage (1) buses that normally turn left out of Lower Albert Street would not be able to do so. Vehicles are only permitted to turn left onto Quay Street. It is not clear how those buses will then be able to travel west. Similar consideration needs to be given to buses arriving from the west that turn right into Lower Albert Street. Stage (5) will also affect the routing of buses.
159. Please provide further details on the proposed rerouting of buses, including any temporary relocations of existing bus infrastructure.
160. Further to Matter (158), there are a number of other specific clarifications required surrounding the various stages. Further details, inclusive of supporting additional assessment, is required in relation to the following:
- a. *Stage (1)*:
 - i. The location on Quay Street where vehicles are prevented to travel towards Lower Hobson Street needs to be further east than Lower Albert Street as Lower Albert Street is limited to bus and authorised vehicles only. As identified above, the restriction may need to apply from Commerce Street. Buses from Lower Albert Street are to be diverted to Customs Street West, however there is left turn only from Lower Albert Street to Quay Street. Subsequently, signal phasing may have to be amended and/or traffic controls at the intersection. Please take this into account through the revised modelling, as required in Matter (151);
 - ii. Please clarify how larger vehicles that end up in the local access area would be able to be turned around in the event of manoeuvring into this restricted area;
 - iii. One of the diversion routes for pedestrians appears to include stairs, where it does not appear that the applicant has provided consideration towards mobility impaired users, particularly during night-time periods. Please clarify what measure(s) are proposed to ensure that mobility impaired users are provided with advanced warning of alternative routes to manoeuvre through the proposed routes in a safe manner.
 - b. *Stage (2)*:
 - i. The single left turn lane from Quay Street to Fanshawe Street would impact buses as they would need to merge into a single lane. Tracking onto the Lower Hobson Street flyover past the crane would need to be demonstrated that it can be undertaken safely and that there is sufficient width for larger vehicles to complete the movement past the crane. Please provide further

assessment, inclusive of additional tracking illustrations, addressing this matter;

- ii. Please provide further information on the diversion route for the closure of southbound Lower Hobson Street slip lane. No details have been provided at this stage;
- iii. It is unclear whether the footpath on the corner of Lower Hobson Street / Quay Street can accommodate heavy vehicles, as it is currently shown that the tracking of construction vehicles is intended to mount the kerb / footpath. This could damage the upgrade works in this location, which is not a supportable outcome. Please provide further clarification in response to this matter.

c. *Stage (3):*

- i. Please clarify whether any lane closures and/or reductions in lane width(s) are proposed along Customs Street West, and provide a supporting adverse effects based assessments relating to the effects of such lane closures and/or reduction in lane width(s).
- ii. Please clarify whether Stage (3) can be extended to include most of the eastern portion of the car park, enabling the duration of Stage (4) control to be reduced.

d. *Stage (5):*

- i. Please provide further assessment to quantify the adverse effects on Fanshawe Street through the removal of a single lane. Further to this, please clarify whether the existing bus lanes will be closed for the period of works required for Stage (5);
- ii. Please provide further supporting information on the proposed traffic diversion route for eastbound traffic from Nelson Street and Fanshawe Street. Specifically, we are wanting clarity around whether this is to be directed down the single lane on Lower Hobson Street and onto Quay Street.
- iii. Further to this, please confirm whether the proposed diversion route has taken into account the spatial requirements of larger vehicles. Please note, there are restrictions surrounding the use of heavy vehicles along Quay Street, although this does not appear to have been considered as part of the proposed construction vehicle route that has been specified within the CTMP.
- iv. During the removal of the carpark ramp over Customs Street West the CTMP currently proposes that all bus services be redirected to travel north on Lower Hobson Street. This arrangement will work for the North-Western bus services, as they start their services on the eastern side of Lower Hobson Street. However, this will not suit the Northern services as they will start their services on the western side of Lower Albert Street. Please provide further assessment to demonstrate whether alternative routes can

be used in order to maintain suitable service of any nearby bus routes, including the Northern and North-Western services.

161. It is recognized for a significant period of time that the slip lane of Lower Hobson Street would be closed for the required construction. Any vehicles wanting to use that lane would not be able to do so given the restrictions. Please provide further detail around the southbound Lower Hobson Street traffic volumes for vehicles relying upon this connection and details of any proposed diversion route(s).
- a. Given the proposed closure of Lower Hobson Street, and requirement for part of the flyover to be propped up for the duration of works, please provide further assessment on how the existing on-street parking located beneath the flyover, two of which are understood to have been included for police use, will be provided for during the period of construction and/or identify whether any arrangements have been made to relocate these car parks for the stated construction period.

Residential Drop Off / Pick Up Area

162. We note that the redevelopment includes a proposed drop-off / loading area towards the south-west of the existing shared laneway. Notably, a secure line is proposed immediately in front of the residential drop off area. This raises concerns surrounding the operation of the accessway, as it is unclear how the residential drop off area is to be used, for example whether this may be used by taxis and/or uber, and how vehicles would be able to safely exit out of this area. As proposed, it would appear that vehicles would either reverse into Customs Street West and/or have to manoeuvre within the laneway itself which could create a conflict point with the adjacent network and/or lead to further queuing into the road. The secure line may result in some motorists turning right into the site from Quay Street to avoid the secure line; this would exacerbate the effects on the bus lane on Quay Street. Therefore, further information is necessary to understand what type of users will be reliant upon the residential drop off area; the frequency of pick ups / drop offs; and whether vehicles would need to reverse onto the road or whether on-site manoeuvring can be achieved so that motorists can exit in a forward direction; in order to understand whether vehicles can exit the area in a safe and convenient manner.
163. The applicant's assessment is not wholly clear in terms of how accessibility to any cycle parking area is to be achieved. As proposed, the service lane does not allow cyclists to get through the area in a safe or convenient manner. Further, there are questions surrounding how the pedestrian linkages to other parts of the network are intended to operate. At this stage, it does not appear as though any new crossing(s) and/or other connections are proposed, outside of the integration of the existing podium of the Aon Building. Given that it is anticipated that the development will significantly increase the pedestrian and cycle demand to the area and site, further details are requested around how the movement of pedestrians and cyclists travelling between the site and the wider road network will be managed to ensure that there is safe and appropriate access on the immediately adjacent streets to the development. This should include details of any enhancements to pedestrian and cycle crossing facilities and footpaths surrounding the subject site.

Other s92 Requests:

164. For alternative and departure routes, please provide an assessment of vehicle tracking inclusive of supporting tracking plans. As part of this response, please rely upon As-built

surveys of existing kerblines to inform the tracking diagrams.

165. Please provide maximum dimensions for crane set-down footprint, including stabilisers and kentledge as required.

166. Service and delivery requirements for all affected properties must be identified and provided for, particularly those properties along the western side of Lower Hobson Street. Please provide further supporting information on how any existing servicing / delivery arrangements are to be maintained for any nearby properties.

a. As part of this response, please demonstrate whether any underlying resource consent decisions relating to the Aon / HSBC buildings are of relevance in providing a response to Matter (166). One of the areas that we are concerned by is the potential that the upgrading / redevelopment of the shared vehicle accessway has the potential to create conflict with any underlying consents, which may have been consented on the basis that access to loading located within the extent of the shared vehicle laneway was achieved.

Advice Note:

If this is the case, then further resource consent(s), including a variation to underlying conditions of consent, may be required.

167. Little information has been provided in order to understand how the shared vehicle lane is to be demarcated, and operated, after construction is completed. It is understood that the existing service lane includes a number of loading spaces; pedestrian accessways (servicing adjacent fire egress); and undercroft bicycle parking. Please provide further information, inclusive of supporting plans, on the proposed condition / demarcation of the shared accessway / service lane.

Providing the information

Please provide this information in writing within 15 working days⁷ (before 15 October 2024). If you will not be able to provide the information by that date, please contact me before then to arrange an alternative time. We will not work on your application any further until either you provide this information, or you state that you refuse to provide it.

Note: If you will require more than 15 working days to provide this further information, I will seek that you agree to an extension of time under [section 37](#) of the Resource Management Act 1991 (the RMA). This will enable appropriate time for me to undertake the necessary review of the information once provided.

Refusing to provide the information

If you refuse to provide the information, or if you do not submit the information to us within 15 days (or by another other agreed time), the RMA requires that we publicly notify your application.⁸

If this happens, you will be required to pay the notification fee of \$20,000 in full before we proceed with the notification of your application.⁹

⁷ Section 92A(1) of the RMA

⁸ Section 95C of the RMA

⁹ Section 36AAB(2) of the RMA

Next steps

Once you have provided the requested information, I will review what you have provided to make sure it adequately addresses all of the points of this request.

In the application acceptance letter, I described the statutory timeframe for our decision on your application. The time for you to respond to this further information request will be excluded from this timeframe¹⁰. I will be able to give you an updated forecast on a decision date on request once you have provided the information requested above.

Suggested changes/recommendations – not pursuant to section 92 of the RMA

Planning

1. Please can it be clarified if the vertical clearance height restriction at the Custom Street West Laneway entrance could be increased in height in the context of the levels achieved on the pedestrian levels above? Is it possible that the vertical clearance to be increased by any margin?

Urban Design Specialist

2. Could the applicant please confirm if any consideration was given to the vertical panel arrangement of Tower 2 during the design process, and whether if these panels could be configured in a way to help reduce the perceived bulk of the building, particularly in relation to the western interface?
3. On page 43 of the Urban Design report by McIndoeUrban, it was noted that ‘The perspectives (figures 2.3 and 2.34) show clear differentiation between the podium and the towers above which avoids a sense of the towers morphing into the podium and vice versa and the impression of bulk that could result.’ Please note that Tower 2 is also only 4.5m set back from the podium level, which is a considerable shortfall of the required 6m from the H8.6.24 rule. Also, in these images the colours/tones of the architectural fins at the podium levels appear to be very similar to the panelling colours of the tower, therefore creating a more visually similar look and feel between these two elements rather than avoiding a morphing outcome. Please clarify what informed this assessment as stated in the urban design report.



Figure 2.33 Podium viewed from the south-west over Lower Hobson Street, shown with the Existing ramp removed. Podium P2 is at left, P1 at right. (Render 01)



Figure 2.34 Podium (P3 at left, P2 at right) viewed from the north-west over Lower Hobson Street, shown with the existing ramp removed. (Render 09)

Figure 5. Figures 2.33 and 2.34 from the urban design assessment report.

Landscape Architect

¹⁰ Section 88C(2) of the RMA

4. Paragraph 5 of the Landscape Effects Assessment refers to TAG panels and workshops. The TAG comments provided with the application (Appendix 3) notes that one of the TAG members did not support the proposal. As such, it is requested that an explanation be provided as to how the landscape effects assessment has been informed by the TAG comments, including the views of the TAG member who did not support the proposal, to assess the landscape effects of the proposal.
5. In regard to the TAG comments provided with the application (Appendix 3), please clarify whether TAG was provided with the visual simulations that are appended to the landscape effects assessment in order to review the proposal. If not, please explain the differences between the images that TAG was provided and the visual simulations that are appended to the landscape effects assessment.

Auckland Transport

The following matters are recommended to the applicant to take on board and address at their discretion. These are not s92 requests, but suggestions/other items for the applicant to consider:

Approach to managing construction effects / proposed staging

As identified in LUC60435285, Auckland Transport holds significant concerns relating to the overall approach in managing any construction related adverse effects, such as the resulting delay to bus journey times, and the manner in which construction vehicles will enter / exit from the subject site. The extent of the concerns is exacerbated by the considerable increase in construction traffic and duration, which is anticipated to be up to seven years from commencement to completion. AT has identified a number of principles for work being undertaken with Auckland's City Centre, which is used to inform the preparation of CTMPs as a means of avoiding and/or mitigating effects upon the wider transport network. These can be found within AT's Temporary Traffic Management Guidelines ("TTMG") 2022 to 2025, dated 7th September 2022. It is noted that the draft CTMP has not been prepared in accordance with the principles, including any supporting specifications, set out within the aforementioned document and otherwise does not suitably avoid and/or mitigate adverse construction related effects upon the City Centre's transport network.

6. Consequently, AT considers that an updated draft CTMP is required to be prepared for AT's review and input, that better provides for the adoption and implementation of the principles of the TTMG and other specific matters outlined within this memorandum.
7. Notwithstanding the above, and pending a response to the various s92 matters included above, the following further specific concerns relating to the various staging proposed is provided below. As noted previously, the focus of the following matters is made in relation to year one of demolition as it is unclear in terms of the type of control measures / road closures that will be necessary to facilitate the redevelopment of the subject site. This is not an exhaustive list of concerns;

Stage (1):

- a. The footpath along Customs Street West is proposed to be closed. It is not clear why this is necessary in this stage (or Stage (2) for that matter) as there are no works in this area. Keeping the signalised crossing open would provide an

alternative for pedestrians;

- b. Cycle facilities on Customs Street West would be closed to cyclists. As a result, cyclists would need to dismount and travel through Wynyard Quarter.

Stage (2): The footpath along Customs Street West is proposed to be closed, however it is not clear why this is necessary. The applicant is advised to consider whether closure from Customs Street West / Sturdee Street West intersection, where the signalised pedestrian crossing is located, could be achieved. Keeping the signalised crossing would provide an alternative for pedestrians. Construction during Stage (2), at this stage, only is located within the north-western corner of the building.

Stage (3): The response to Matter (160)(c) raises a potential concern in terms of any potential lane closures / reduced lane widths due to the operation of the adjacent bus network.

Stage (4): Closure of bus lane on Customs Street West will further impact buses as the applicant's intention is to remove bus priority.

Stage (5): With regards to Matter (160)(d)(ii), there are significant concerns relating to the use of Quay Street as a diversion route for heavy vehicles, given the functionality of the existing road coupled with the streetscape improvements that have been completed for the locality. By diverting construction vehicles through this space, there is a high risk of causing damage to nearby streetscape amenities and other key infrastructure.

The stage numbering indicates a chronological staging of the demolition of the DTC. Stages (1) and (5) are anticipated to have the most significant impact upon the operation of the network. As these are short duration activities, if these could be timed to occur during school holidays (e.g. over the summer break (January)), then this would significantly reduce the effects of these closures due to the much lower traffic volumes at this time.

8. It is understood that the footpath along Customs Street West is intended to be closed for a significant proportion for the duration of required construction, ultimately resulting in pedestrians being redirected towards Fanshawe Street or Quay Street. This creates issues for people with accessibility issues due to the gradient differences coupled with stair access leading up to Fanshawe Street. Signposting this to ensure that pedestrians are aware of the access restrictions would prove problematic. Therefore, the applicant is requested to demonstrate how alternative routes would operate for all users, including those with mobility issues, or maintain pedestrian access throughout the periphery of the subject site. Notably, this aligns with the principles of the TTGM.
9. The City Centre is under significant stress and strain regarding the availability of kerb space. To this effect, it is requested that the applicant confirm a commitment that once the basement is completed that contractor vehicles would be able to be accommodated within the subject site. As part of this, it is noted that there is a requirement for FENZ and other emergency / incident access etc).
10. AT accepts that at this stage, the flyover removal has not obtained resource consent, and as such would not form part of the receiving environment. However, AT wishes to acknowledge that the approach to managing construction effects in this constrained environment will be a long-term commitment between the applicant and AT in order to

ensure the continued safe and effective operation of the surrounding, and wider, transport environment. To that effect, whilst it may fall outside of the remit of Resource Management Act, AT want to identify the need to take an integrated approach between the delivery of the flyover removal and redevelopment of the subject site. Failure to do so may have unintended consequences in that the flyover removal may not be able to be delivered in a timely manner and prior to the DTC redevelopment being completed should this be feasible, should sufficient space within the road reserve not be allocated equitably to both parties.

Operation of Hobson Street Flyover / Lane Closures

11. There are concerns regarding the proposed crane location described as (2K) for Stage (2), which will restrict access to the Hobson Street flyover. We cannot see that a crane can be safely stabilised and operate with a live traffic lane onto the flyover, which is shown as a single lane southbound, as the only traffic route from Quay Street. Tracking shown for Stage (2) is not good as it currently shows tracks arriving and tracking over the footpath. An alternative crane location may be feasible on the Lower Hobson Street low level, should trucks be able to reverse into the site to load.

Right Hand Turns Into Service Lane

12. Whilst the right hand movements into the site from Quay Street, which is assumed to be a reasonably low number, there is anticipated to be some queuing for the Eastbound bus lane where there are currently no queues forecasted. The potential for queuing to occur for motorists waiting to turn into the site, travelling in the eastbound lane along Quay Street, has the potential to increase journey times and cause delays to the start of services, such as the North Western bus way, along Lower Albert Street and for any other out of service buses. At this stage, we are unable to support the use of right hand turns into the shared laneway within the subject site. Further consideration is necessary around establishing whether mitigation measures can be implemented to restrict right hand turns into the subject site.

Ongoing Use of Quay Street for Service Vehicles / Shared Accessway Operation

13. AT notes that it appears as though the applicant has not taken into consideration that there is a heavy vehicle access restriction through Quay Street, as the assessment demonstrates that service vehicles will enter / exit the shared service lane from Quay Street. The use of heavy vehicles in recent years have led to unintended damages to the streetscape improvements that have been fully implemented along Quay Street. As such, the applicant is requested to look at alternative circulation routes to avoid having heavy service vehicles from entering the site, traveling from Quay Street.
14. Further to the above, there is limited information available to understand how the secure line is to operate and whether this could lead to queues forming for any motorists waiting to enter into the proposed car park after turning into the shared accessway. If the queue length for motorists extends into Customs Street West, this could affect pedestrians on the footpath, buses, and it is possible that motorists may end up circling around the block through to Quay Street / entering into adjacent bus lanes, given the significance of Customs Street West as a key east-west corridor. AT is concerned by the potential for queues to form back into the network causing friction with any nearby bus routes and on pedestrians.

If you have any queries, please contact me on 027 352 7379 and quote the application number above.

Yours sincerely,

A handwritten signature in black ink that reads "Sarah Wilson". The signature is written in a cursive style with a small dot above the 'i' in Wilson.

Sarah Wilson
Senior Planner