MUL Urban Design Memo #15

To	Barker and Associates: Pamela Santos and Karl Cook
Copy to	Precinct Properties: Iain Purdie Russell McVeagh: Louise Espin and Simon Pilkinton Warren and Mahoney: Blair Johnston and Michael Mason RCP: Bianca Hurrell McIndoe Urban: Andrew Burns
From	Graeme McIndoe, McIndoe Urban
Date	30 March 2026
Subject:	**Urban Design Response to Auckland Council Urban Design Feedback**

SCOPE

The Auckland Council feedback is in four documents all of which have been reviewed:

- BUN60460864 (EPA: FTAA-2512-1158) The Downtown Carpark Redevelopment – Te Pūmanawa o Tāmaki **Key Urban Design Issues (25 March 2026)**
- PRR000043070 – **FTAA – Downtown Car Park (25 February 2026)** [This is a seven-page memo, File name is dated 03.03.2026]
- BUN60435935 – 2 Lower Hobson St_**UD Addendum PC78**_02_SS_md.pdf **(12 June 2025)**
- BUN60435935 – 2 Lower Hobson St_ **Final Urban Design Memo (30 May 2025)**

The Council feedback records general agreement on multiple matters, and these matters are neither recorded nor addressed in this memo. Instead, this response to Council feedback focuses on matters which are not agreed and/or which may benefit from discussion and/or for which further information may be supplied to assist resolution. These are:

1. Assessment against purpose of H8.6.2. General building height
2. Slenderness of the towers
3. Request for comparative shading effects description and assessment
4. Shading of identified public open spaces
5. Detailed design at ground level in relation to wind, canopies and hotel drop-off area
6. Daylight analysis and assessment

Auckland Council in BUN60460864 – DTCP – S67 RFI Key Issues 26.3.26 requests further information on universal design and potential accessible units. This matter is addressed by others.

Each Council feedback document is identified primarily by the text in bold above, including the document date. The urban design response includes a detailed tabulated analysis including, for ease of reference, relevant parts of the MUL Urban Design Assessment (UDA).

1. ADDRESSING PURPOSES OF H8.6.2. GENERAL BUILDING HEIGHT

a) Auckland Council identifies a need to assess building height against the purposes of H8.6.2. 'General building height'. While not consolidated into a single list, assessment against most of the purposes is included in various parts of the UDA and is compiled into the table below. Assessment against the outstanding purpose to "consolidate the city centre as the top of the centres hierarchy in Auckland" has been added.

Auckland Council feedback	Assessment relative to purposes of H8.6.2. General Building Height MUL Urban Design Response – includes extracts from MUL UDA
FTAA- Downtown Car Park (25 Feb. 2026) The following consent matter / rules assessment is not agreed: The Proposal involves the construction of a new building comprising of two towers that do not comply with Standard H8.6.2(2) General building height which specifies that where height limits are shown on Map H8.11.3 and Map H8.11.4 overlap, the lowest height limit applies as the first level of control. In this regard, whilst Map H8.11.3 General height controls, identifies the site as within the Special Height Area (without height limit), Map H8.11.4 identifies the site as subject to Height Control Planes: Quay Street Harbour Edge. The lowest limit is the Harbour edge height control plane for the purpose of Standard H8.6.2(2) and is not met. This is a **restricted discretionary** activity under rule C1.9(2). This is important as the effects of the building height infringement are to be considered in the context of the relevant criteria. C1.9(2)(b) requires consideration of the purpose of the standard (refer to footnote 1) and whether that purpose will be achieved if consent is granted. This is flagged as Appendix 11 - Urban Design Assessment does not consider this.	This Auckland Council feedback is correct to the extent that there was not an assessment in the UDA specifically against the Purpose of H8.6.2. General building height. Assessment was instead against the purpose of the HEHCP given the infringement of that standard and assessment criteria relating to that infringement. Correlation of that assessment with the purpose of H8.6.2 General building height is identified below, with all but one of the matters identified by the purpose of 'H8.6.2. General building height' having been addressed: **H8.6.2 General building height.** *Purpose: to manage the height of buildings within the city centre to:* • *enable the tallest buildings within the core of the city centre;* Not specifically addressed other than this planning context being noted on page 6 in relation to the aspiration of the CCMP, and the Unitary Plan context of unlimited height in the SHA within the city centre zone subject to application of particular controls. • *transition heights down to neighbourhoods adjoining the city centre and to the harbour edge*; "Transition of height from the core CBD to the waterfront" is addressed in the UDA Section 2.7, pages 24-25 and also at pages 28, 32, 33, 50. This was part of assessment relative to the purpose of the HEHCP. • *consolidate the city centre as the top of the centres hierarchy in Auckland;* Not addressed in the UDA. However, considering this now: The quality, height and intensity of the Precinct Properties proposal will inherently contribute to achieving this purpose. • *respect the existing and planned built form and character of the zone and precincts; and* This matter is covered in detail in relation to H8.8.2. Assessment criteria (a) building design and appearance: *Contributing to a sense of place* (i) at UDA pages 16,17.

	• *avoid adverse dominance, shading and/or visual amenity effects of building height on streets and public open spaces*. "Potential visual dominance at street level" is addressed in Section 2.7 at pages 28-30 and 34. Visual dominance in relation to tower setback infringements is addressed at page 44. Shading effects from building height on streets and public open spaces are addressed in detail in pages 53-62 inclusive and page 72 in the following report sections: – 3.2 City centre shading assessment – 3.3 Shading to nearby public open spaces – 3.4 Shading to surrounding street network – 3.8 Conclusions • *provide for variations to building height to recognise the character and amenity of particular areas, including heritage places.* While not specifically covered under this heading, this matter is addressed in a number of places in the UDA. – Height variation as a means of providing visual interest in long range views is addressed at p11. – Character of particular areas is addressed with: contribution to city skyline (p16) – Contributing to a sense of place and to the city centre skyline (pp16,17) – Shading studies in relation to the amenity of the heritage Ferry Building and the single storey heritage kiosk to the north of that (pp 56, 59)

2. SLENDERNESS OF THE TOWERS IN RELATION TO CHAMFER CHANGE

a) Auckland Council observes that a change to the extent of the chamfers in the FTA proposal leads to a reduction in perceived slenderness. That is correct, however, the towers still display a suitable inherent slenderness.

Auckland Council feedback	**Slenderness of Towers** **MUL Urban Design Response – includes extracts from MUL UDA**
Key Urban Design Issues (25 March 2026) 3. Reduced chamfers (Tower 1): The reduced chamfer treatment, particularly to the northern elevation, results in a perceptible shift in tower expression, with a noticeable reduction of the sense of slenderness compared to earlier iterations. **FTAA-Downtown Car Park (25 Feb. 2026)** Based on the review of the revised documentation the following key issue is identified: • The infringement of the maximum average tower dimension has increased from approximately 1.0m to 2.81m, equating to approximately a 5% variation relative to the 55m standard. The east-west tower width remains at 36.9m, supporting a slender high-rise expression, which is positive. This change could have some contribution to the reduced sense of slenderness, combined with the reduced chamfers. The reduced chamfers reduce the slenderness of the proposed Tower 1. The Figures below shows the expression of the chamfers as experienced from the harbour. R.C And Fast Track Versions and the chamfers formed a significant part of the Cultural Narrative / Concept. TAG Approved Scheme – The T1 chamfers were much more definitive with the TAG approved version of T1 appearing significantly more slender compared to the FTA version.	The Auckland Council's observation that the form of the towers has changed and they will appear less slender than a previous iteration is correct. However, while change has occurred through design development, the towers remain suitably slender. The extent of slenderness of the towers is addressed in the UDA at pages 18, 34, 42, 44, 45, 46, 51, 62, and 137. For example: *Page 18: Slender towers* A visual effect of slenderness is achieved given the height to width proportions of the towers. • T1 is 36.9m and T2 22.6m wide in an east-west direction. These are both substantially narrower than the 45m Unitary Plan standard. • The towers rise above their podium 188.5m and 128.0m respectively. This gives a height to width ratio for T1 of 5.1 : 1, and for T2, 5.7 : 1. The vertical emphasis of these proportions achieves an inherent slenderness that can be seen in views from the south and north – refer to figures 2.14 and 2.15. • In addition, the chamfers visible at the tops of the towers contribute further to perceived slenderness. This effect is seen particularly in views of T1 from the north-west and south-east and views of T2 from the south-west and north-east. *Page 46: Slender appearance* • The height and vertical proportions of the towers give an inherent slenderness. This effect of slenderness is reinforced by the long chamfers at the top of both towers. In this circumstance, T1's minimal exceedance of the maximum average tower dimension standard will have imperceptible-to-negligible effect on perceptions of slenderness. *Page 137: Conclusion* 6. Departures from other built form standards are minor and successfully mitigated by the combination of the articulation of form of the towers to reduce apparent and actual bulk, the chiselling of the tower forms for cultural effect and to reinforce slenderness, and openness elsewhere to allow views through.

3. COMPARATIVE SHADING EFFECTS DESCRIPTION AND ASSESSMENT

a) Auckland Council maintains a request for comparative shading diagrams including in relation to three public spaces. However, putting aside all legal and planning considerations, from an urban design perspective in my opinion this is unnecessary because:
   (i) The shading assessment has been undertaken considering all shade from the building, which inherently considers the shade from infringements to standards; and
   (ii) The conclusions of shading effects from comparative assessment will be virtually the same as for assessment of all shade cast by the proposal.

b) In the Shading Effects Summary in Final Urban Design Memo (30 May 2025) the Council reviewer states: "Upon reviewing the shading diagrams and the provided assessment, I am in general agreement with the findings of these documents. It was observed that most shading from the proposed buildings generally merges with existing complex shadows of the densely built City Centre environment." Assuming general agreement with shading methodology and findings it is possible this request for comparative description primarily applies to the shade cast on three spaces: St Patrick's Square, Takutai Square and Te Komititanga.

c) Close inspection of the shading diagrams and correlation with the elevations of the proposal show that the areas of shade impacting on:
   (i) St Patricks Square is from the top of the building above the HEHCP;
   (ii) shade on Takutai Square at the identified times is from a part of the building below the HEHCP; and
   (iii) the source of the shade on Te Komititanga at the identified time is unclear but it is likely that at least some of this is from the upper parts of the proposal.

Auckland Council feedback	**Comparative shading effects description and assessment** **MUL Urban Design Response – includes extracts from MUL UDA**
Key Urban Design Issues (25 March 2026) 1. Shading and additional bulk effects: While shading effects on St Patrick's Square remain limited in isolation, the lack of comparative shading analysis makes it difficult to understand the incremental effects of the additional upper-level massing on surrounding public spaces and streets. **S67 Information Requests** **Shading – Additional Bulk Effects** In the context of the building bulk and scale proposed, to support an effects-based assessment of shading, please provide shading diagrams that clearly distinguish the extent of shading generated by the proposed development relative to a building envelope that complies with the	Addressing comparative shading diagrams remains a legal and planning matter. From an urban design perspective the shading assessment has been undertaken considering all shade from the building, which inherently considers the shade from infringements to standards. It is therefore unnecessary to show the shadow from the infringing parts of building as the same conclusions on shading effects will be drawn. That is, the infringing parts are already taken into account.

Auckland Council feedback	Comparative shading effects description and assessment MUL Urban Design Response – includes extracts from MUL UDA
relevant Business – City Centre Zone Standards. This should include: • A comparative shading overlay showing the shade arising from a building envelope that complies with the Business - City Centre Zone Standards and the proposed development; • Clear graphic differentiation (e.g. colour tone or hatch) identifying shading attributable to the Business – City Centre Zone Standards that are not complied with, including the additional upper-level massing (with respect of infringed Standards H8.6.2 and H8.6.5; and • Identification of the extent and duration of this additional shading, particularly on public open spaces.	
FTAA-Downtown Car Park (25 Feb. 2026) Other previously identified key issues that remain include the following: ○ Shading diagrams: The council reiterates its previous requests that shading diagrams need to be provided that identify the shading effects and extent of amenity loss relating to sunlight that are attributable to the infringements of standards and the cumulative effects of the infringements to all standards including the below: ○ Standards H8.6.2 General building height and H8.6.24 Maximum tower dimension, setback from the street and tower separation (H8.8.(6)(a)) and C1.9(3)(e) and (f)); ○ Standard H8.6.5 Harbour edge height control plane (H8.8.2(8A)(a)(ii), (b)(i) and C1.9(3)(e) and (f)); ○ Standard H8.6.25(2): Building Frontage alignment and height (H8.8.2(9)(d)(i)) and C1.9(3)(e) and (f))	**ASSESSMENT OF SHADING EFFECTS RESULTING FROM INFRINGEMENTS OF STANDARDS** The effects of infringements on sunlight/shading have been comprehensively assessed as identified below. ***H8.8.2 Assessment criteria*** ***(8A) infringement of the harbour edge height control plane standard:*** *(b) Amenity effects on the streetscape and adjacent public open spaces along the waterfront:* *(i) The extent to which building bulk above the harbour edge height control plane results in loss of amenity to adjacent public open spaces along the waterfront, including:* • *Sunlight admission.* (Unitary Plan) MUL Assessment in relation to the HEHCP infrngmnt (p 40) Effects on sunlight admission to Quay Street and the water edge areas and spaces to the north of that are generally nil, and at the limited time of year when they do occur, are negligible. This is because the proposal is to the south of Quay Street and the waterfront. Moreover, it is set back behind the row of existing buildings that front to Quay Street The proposal does cast shade over some other nearby public open spaces. In all cases the shading effect is limited to a specific time of year and when it is experienced, any additional shade is limited in extent and duration. • *Shading and dominance at street level and public spaces, in particular Quay St, Queen St, and Customs St.* (Unitary Plan) MUL Assessment in relation to the HEHCP infrngmnt (p 40) *Shading of identified streets and public open spaces* For comprehensive analysis of shading refer to Section 3.3 *Shading to nearby public open spaces,* and Section 3.4 *Shading to surrounding street network.* That analysis

Auckland Council feedback	Comparative shading effects description and assessment MUL Urban Design Response – includes extracts from MUL UDA
	demonstrates that waterfront public space shading effects only occur in mid-summer: • additional small patches of shade are cast over Quay Street and the related waterfront public open space across Quay Street only at 6.00 and 7.00pm; and • Waitematā Plaza and the adjacent Viaduct Harbour Promenade receive additional shade at 8.00am but this has largely dissipated by 9.00am At those times for both of these areas, additional shade is both limited in extent and fleeting. Therefore, shading effects on Quay Street and the related public areas of the waterfront are 'negligible'. *Street shading Queen Street and Customs Street West* Analysis demonstrates that adequate sunlight is maintained to the surrounding street network. The worst-case events of shading on the surrounding street network throughout the year are highly localised and limited in extent and duration and are at most of 'low' significance. Some additional shade is cast over part of Lower Queen Street, Te Komititanga. However, this is limited in extent and duration and occurs well outside the identified season and period for sunlight control of that space. Considering the whole year and limited extent and duration of additional shade, the shading effect on Te Komititanga/Queen Elizabeth Square will be 'negligible'. (Refer to table 3.2 Shading of public open spaces.) ***Standard H8.6.24. Maximum tower dimension, setback from the street and tower separation*** *Purpose: ensure that high-rise buildings:* • *provide adequate sunlight access to streets and public spaces;* • *provide adequate sunlight, daylight and outlook around buildings;* MUL Assessment in relation to the HEHCP infrngmnt (p 46) *Sunlight and daylight access to streets and public spaces* • Adequate sunlight access is provided to streets and public spaces as examined in detail and identified in the shading effects study (Section 3.4). MUL Assessment in relation to the HEHCP infrngmnt (p 47) *Sunlight, daylight and outlook around buildings* Considering T1 in relation to T2: • The 15.35m (glass-to-glass) distance between the towers in combination with the plan offset of T2 from T1 well exceeds the standard to ensure better than adequate sunlight, daylight and outlook between these buildings. Considering T1 in relation to Aon House: • Aon House is 11.5m (glass-to-glass) to the east of T1. This is close to meeting the standard and allows sufficient separation to allow adequate sunlight, daylight into and outlook from the offices in these buildings.

Auckland Council feedback	Comparative shading effects description and assessment MUL Urban Design Response – includes extracts from MUL UDA
	Considering T2 in relation to the Viaduct Harbour Precinct to the west: • Any building along the western side of Lower Hobson Street in the Viaduct Harbour Precinct is permitted to rise to 24m above ground. This is directly across the street and 32.9m away from the proposed podium P2 which rises to approximately 31.4m above ground. • T2 rises above that podium and is set back a further 4.48m for a total separation distance of 37.4m. The additional 0.95m façade width of T2 will have no appreciable effect on outlook from those buildings or any other view from the Viaduct Harbour. The UDA includes further assessment in relation to matters of discretion: ***H8.8.1 Matters of discretion*** ***And H8.8.2 Matters of Discretion*** [This is a combined assessment of H8.8.1 and H8.8.2 as the wording of the three identified matters (a), (b) and (c) is either identical or virtually identical. The origin of each section of text is identified.] *Assessment criteria for infringement of setback from the street and tower separation in special height area and building setback from boundaries standards: [H8.8.1 and H8.8.2]* *(a) effects of additional building bulk and scale on neighbouring sites, streets and public open spaces (sunlight and daylight access, dominance, visual amenity, and landscape character); [H8.8.1. and H8.8.2., plus below, sub-criteria (i) to (iii) from H8.8.2]* MUL Assessment in relation to the HEHCP infrngmnt (p 51) *Effects on neighbouring streets and public open spaces* Sunlight and daylight access, dominance and visual amenity are all assessed above in relation to tower separation distance and H8.8.2. Assessment Criteria. The same assessment applies to this matter of tower setbacks. (See also analysis above of comparative Views A-F.) Considering shading of public open space, Sturdee Reserve is addressed in the separate shading analysis. However, the reduction of the setbacks of the towers from the street will not compromise the amenity of this space. • Sturdee Reserve enjoys the propitious effect of sun that will be received over the height restricted areas of the Viaduct Harbour Precinct to the west and northwest, including over the single storey Tepid Baths building; and • The 25m setback of T2 from Customs Street West ensures that considerably more sun will reach this space at the equinox between 12 noon and 2.00pm than if T2 were to be located to precisely comply with the envelope established by the street setbacks. *Policy H8.3(30)* *Manage adverse effects associated with building height and form by:*

Auckland Council feedback	Comparative shading effects description and assessment MUL Urban Design Response – includes extracts from MUL UDA
	(b) protecting sunlight to identified public open spaces and view shafts; MUL Assessment (p 52) Sunlight is protected to identified public spaces as addressed in Section 3.3 'Shading to nearby public open spaces'. The identified exception is a negligible and fleeting infringement to shade over part of St Patricks Square during the identified mid-winter period. (Refer to Section 3.3, Table 3.2.) The parts of the T1 and T2 which infringe the street setback standard will have nil or no appreciable effect on shading on Te Komititanga, St Patricks Square and the waterfront. *(d) managing the scale, form and design of buildings to:* *(i) avoid adverse dominance and/or amenity effects on streets and public open space; and* MUL Assessment (p 53) *Amenity effects on streets* Adequate sunlight access is provided to streets and public spaces as examined in detail and identified in the shading effects study (Section 3.4). **H8.8.2. Assessment criteria** **(a) building design and external appearance:** ***Variation in building form/visual interest*** *(xixb) the extent to which adequate separation between buildings is provided:* • *to ensure sunlight and/or daylight reaches the street* MUL Assessment re tower separation infringement (p 54) See assessment in Table 2.3: 'Maximum tower dimension' with an extract from that repeated below: *Sunlight and daylight access to streets and public spaces* • Adequate sunlight access is provided to streets and public spaces as examined in detail and identified in the shading effects study (Section 3.4). • Notwithstanding minor infringement of the 12m spacing between T1 and Aon House, and shortfall in required 6.0 setback from Lower Hobson Street the daylight around buildings can be expected to be better than adequate. This is because of the openness all around the site. Complementing that is the separation of towers which allows for shafts of sky exposure through the site and therefore contribute to the extent of daylight that will received. See also assessment of shading to streets in Section 3.4 'Shading to surrounding street network' which makes the following summary observation: • This analysis demonstrates that adequate sunlight is maintained to the surrounding street network. The worst-case events of shading on the surrounding street network throughout the year are highly

Auckland Council feedback	Comparative shading effects description and assessment MUL Urban Design Response – includes extracts from MUL UDA
	localised and limited in extent and duration and are at most of 'low' significance.
Final Urban Design Memo (30 May 2025) **Infringement of H8.6.24. Maximum tower dimension, setback from the street and tower separation** **(2) Provide adequate sunlight access to streets** **4.5.3** The extent to which the infringements of this standard would affect the shading outcome of the proposal is uncertain, though it is certain that it will have some level of effect. The shading analysis did not provide a specific comparison of the potential outcome of a fully complying scheme against the proposal outcome. • In my experience, given that Hobson Street is oriented North-South, the shortfall in the T2 tower setback would not significantly affect the sunlight outcome of the street, as the sunlight will be coming from a different direction for most hours during the day, except the morning. Also, this tower is set back 25m from Custom Street West, significantly reducing the potential effects of the infringements across this street.	While identifying that the impact of the extent of infringement on shading is not shown, Auckland Council also considers that there will not be significant effects on sunlight on the streets. I agree.
Final Urban Design Memo (30 May 2025) **4.7.1** The UDA provided a detailed shading assessment….. I am generally in agreement with the methodology used. The provided assessment effectively covers multiple aspects of a complex CBD environment.	**SHADING ANALYSIS** General agreement with methodology is positive. Any methodology should be applied consistently. Hence, Council's questioning of the ratings of the significance of shading for three identified open spaces can itself be questioned. See below in relation to 4.7.3.
4.7.2 ("Permitted baseline') During the S92 process, I requested an analysis of the additional height sought beyond HEHCP. However, the applicant does not consider HEHCP requirements a 'permitted baseline,' and thus, these effects were not presented. In terms of analysis and assessment, the provided material only illustrated the effects of the proposed building and did not include a comparison or indication of the effects generated by the additional height that has been proposed beyond H8.6.5 and H8.6.6 standards.	Noted. Legal and planning matter.

Auckland Council feedback	Comparative shading effects description and assessment MUL Urban Design Response – includes extracts from MUL UDA
Final Urban Design Memo (30 May 2025) **8.0 CONCLUSION** 8.0.1 The proposal presents a significant redevelopment that will greatly enhance the surrounding public realm, including the waterfront, supported by high-quality design outcomes. While the architectural design demonstrates a high standard, I remain concerned about the extent to which environmental effects have been addressed. It is crucial that the proposal provides a comparable assessment for shading effects associated with the additional building height and clearly outlines proposed design amendments and mitigation measures for wind effects. Therefore, urban design support for this proposal is contingent on the resolution of shading analysis and wind effects mitigation to ensure appropriate environmental outcomes are achieved.	Noted: This conclusion is positive except for concerns about: • absence of comparative shading assessment in relation to parts of the building above the HEHCP; and • effective wind effects mitigation

4. SHADING OF IDENTIFIED PUBLIC SPACES

a) Council shading effects concerns remain on St Patrick's Square and Te Komititanga/QE Square at times outside those identified by the Unitary Plan and also Takutai Square which is not specifically identified in the Unitary Plan.

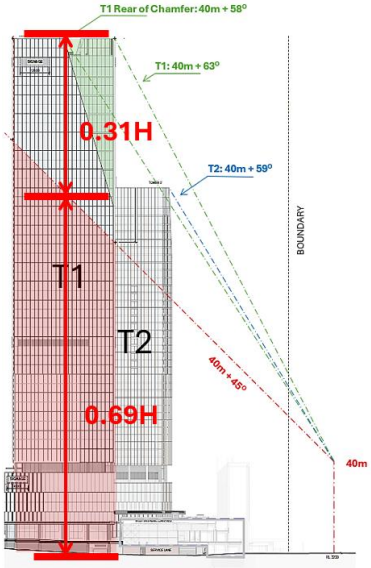
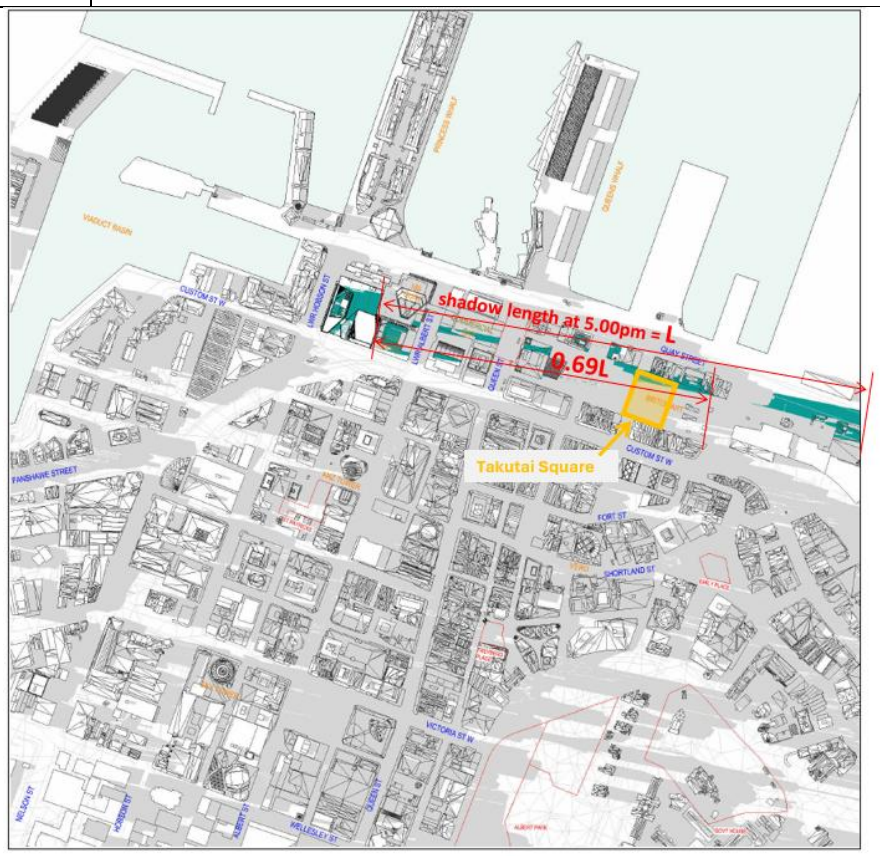
b) Applying a systematic shading assessment methodology, analysis by MUL finds that considering the extent and duration of shade, the significance of shading effects at those times is respectively 'low', 'negligible' and 'negligible/low' for these spaces.

Auckland Council feedback	**Shading of identified public spaces** **MUL Urban Design Response – includes extracts from MUL UDA**
Key Urban Design Issues (25 March 2026) **1. Shading and additional bulk effects** Key shading sensitivities for public open spaces also remain, including: • St Patrick's Square (mid-winter, 11:00–12:00) • Takutai Square (equinox, 5:00 PM) • Te Komititanga (mid-summer, 5:00 PM) **Final Urban Design Memo (30 May 2025)** **4.7.3 Shading Analysis** I am generally in agreement with the rationale and the assessment provided. However, I note some differences of opinion in certain areas, particularly in relation to the shading effects on the public open spaces such as the Te Komititanga Plaza.	Council's general support for rationale and effects assessment is positive. However, concerns for fleeting shade of limited areas outside the identified times seems to depart from a methodology that Council is, at section 4.7.1 "generally in agreement with". Departure from consistent application of a systematic methodology will introduce an inconsistency into review. The methodology extracted from pages 51 and 52 of the UDA for the significance of shading effects is in blue font below. Note that this methodology has subsequently been adopted and extended as the *Urban Designer's Institute of Aotearoa's S-SAM - Systematic Shading Assessment Methodology*. The rating scale and the explanatory notes give context for shading assessment. **Rating scale** 1. ***High***: A change to the amount of shade over a large area and/or with an effect over a large number of buildings and public open spaces, and for an extended period. 2. ***Moderate***: A change in shading over a large area and/or with an effect over a large number of buildings, and which is fleeting; or shading on a small proportion of an identified public open space for an extended period. 3. ***Low***: A change in shading over a small area or low number of buildings or a relatively small proportion of a public open space. The shading is fleeting. 4. ***Negligible***: A change in shading which is limited in extent to the point of being barely perceptible in a particular area or space, and which is fleeting. *The duration and timing of shading.* b) The principle applied is that a shading change that is for an extended period over an identified point will increase the effects. An 'extended period' is taken as meaning for well over an hour. Conversely shading that is fleeting will have reduced and sometimes negligible appreciable effect. 'Fleeting' shade is taken as being experienced for around an hour or less. *Significance of shading to different types of public open space* d) Priority weighting is given to identified public open spaces that people may occupy for extended periods. Shading on public open spaces identified in the Unitary Plan as requiring sun at identified times is most significant. Shading effects on a public open space

Auckland Council feedback	Shading of identified public spaces MUL Urban Design Response – includes extracts from MUL UDA
	are given a lesser weighting when other immediately adjacent parts of the open space receive sun at the same time and are available to occupy.
Final Urban Design Memo (30 May 2025) **4.10 Shading Effects Summary** **4.10.1** Upon reviewing the shading diagrams and the provided assessment, I am in general agreement with the findings of these documents. It was observed that most shading from the proposed buildings generally merges with existing complex shadows of the densely built City Centre environment. **4.10.8** In my opinion, the most significant shading effect is the additional shading cast on public open spaces. These are: St Patrick's Square – Mid-Winter -10.45-11.45 Takutai Square – Equinox – 5 PM Te Komititanga – Mid-Summer – 4 PM	Following the positive review of general shading conclusions, shade on these identified spaces is identified as being the most significant remaining effect. The shade is fleeting and limited in extent. While these shading effects may remain the most significant, as they are outside identified times, their significance is rated in the range of 'negligible' to 'low' when applying the methodology and rating scale that is applied to all shading.
4.10.9 One common characteristic of all three shading events is that they block the last sunlit areas of these squares at the specified times, resulting in a complete loss of sunlight in these public spaces during those periods. As sunlight access is considered a premium in the City Centre environment, the cumulative loss in these spaces is regarded as a significant effect. This is a potential impact of the additional height sought beyond the HEHCP. A comparison between a fully compliant outcome and the proposal could have identified such effects; however, it was not provided. In my view, this analysis should have been included to clarify the extent of the effects.	I do not consider additional shade at limited times of day, with limited extent, at restricted times of year and for very short periods outside those times identified by the Unitary Plan to be especially "significant". With reference to the rating scale used, its significance is relatively limited. Shading to Takutai Square is not due to the part of the building over the HEHCP. See analysis in response to Document 1 above. Cumulative loss is not significant. This is because of the relatively rare occurrence of shade from the proposal on these spaces, the short duration of additional shade, and the broad range of other nearby places and spaces which remain in the sun when the spaces are shaded.
Final Urban Design Memo (30 May 2025) **8.0.3** As noted in Section 4.10.9, while the proposal complies with key Unitary Plan standards such as H8.6.3 (Admission of Sunlight to Public Places), it casts additional shading on three major public spaces; St Patrick's Square, Takutai Square, and Te Komititanga Plaza, during sensitive hours, removing the last remaining sunlit areas at those times. These impacts are considered significant in the context of a	While the shade cast does over brief periods remove the last remaining area of sun on these spaces, the shading effects do not occur during the sensitive hours identified by the Unitary Plan. Reference to the shading drawings can confirm that the identified shading effects: • on St Patrick's Square are from the part of the building above the HEHCP; • on Takutai Square are not from the part of the building above the HEHCP; and

Auckland Council feedback	Shading of identified public spaces MUL Urban Design Response – includes extracts from MUL UDA
compact city centre where sunlight is a valued public amenity. The absence of a comparative shading analysis against a compliant scheme makes it difficult to fully understand the extent to which these effects result from the additional height sought beyond the HEHCP. In this regard, the residual shading effects remain a concern.	• shading effects on Te Komititanga Plaza may or may not be from the part of the building above the HEHCP.
FTAA Downtown Car Park (25 Feb. 2026) Key shading concerns for the public open spaces remain: St Patrick's Square Mid-Winter 11.00-12.00,	**SHADING ON ST PATRICKS SQUARE OUTSIDE THE IDENTIFIED TIME PERIOD** Shading effects for the hour immediately before that identified in the Unitary Plan has been assessed in detail. Considering the entire hour before noon, the significance of the additional mid-winter shading effects on St Patrick's Square is rated as low. See relevant extracts from table 3.2 Shading of public open spaces below. (Refer UDA pp70,71.) *Mid-winter shading before 12.00noon* The mid-winter drawings show that while no additional shade is cast over St Patricks Square at 10.30am, some additional shade occurs at the following times before 12.00noon: • 10.45am: a narrow sliver of additional shade is cast across the western arm of the Square. All of the remainder of the space is in shade. • 11.00am: a band of additional shade is cast across the western arm of the square and all apart from a narrow sliver at its western boundary is in shade. • 11.15am: this band of additional shade is broad and more or less on the alignment of Federal Street. The central eastern part of the Square is already in shade. The western end of the Square is exposed to a band of sunlight. • 11.30am: the band of shade narrows slightly and moves around towards the east and extends the full length of the central/eastern part of the Square. Two bands at the western arm of the Square remain in the sun. • 11.45am: The proposal casts a band of additional shade extending diagonally down from the north-eastern corner of Square. The remainder, approximately three-quarters of the Square, is in the sun. Considering mid-winter times before the controlled midday period, the worst-case times are at 11.15am and 11.30am. At these times very little of the Square receives sun. Overall, the additional shade is limited in area and its effects are fleeting. Thus, applying the rating scale identified above, the significance of this 'worst case' pre-noon shading is 'low'. In the following 30 minutes from 11.30am to 12.00noon, variously some or much of the Square continues to be in the sun. In this latter period considering the fleeting nature of the shade and the availability of sun in other parts of the Square the effects are variously 'low' to 'negligible'. Therefore, considering the entire hour before noon, the significance of the additional mid-winter shading effects on St Patrick's Square is rated as low.

Auckland Council feedback	Shading of identified public spaces MUL Urban Design Response – includes extracts from MUL UDA
FTAA Downtown Car Park (25 Feb. 2026) Key shading concerns for the public open spaces remain: Takutai Square Equinox 5pm,	**SHADING ON TAKUTAI SQUARE** Takutai Square is not specifically identified by the Unitary Plan for sunlight control. Therefore, the following part of the Unitary Plan appears to be most relevant to this matter: ***H8.8.2 Assessment criteria*** ***(8A) infringement of the harbour edge height control plane standard:*** *(b) Amenity effects on the streetscape and adjacent public open spaces along the waterfront:* *(i) The extent to which building bulk above the harbour edge height control plane results in loss of amenity to adjacent public open spaces along the waterfront, including:* • *Sunlight admission.* MUL Shading Assessment (page 40) "The proposal does cast shade over some other nearby public open spaces. In all cases the shading effect is limited to a specific time of year and when it is experienced, any additional shade is limited in extent and duration." MUL Shading assessment at p67 for 5pm Spring Equinox 23 September. "At this time the sun is low. Shade is cast onto Tyler Street in Britomart, and beyond that over to Quay Street and into the port, from a point just to the east of Britomart Place. This shade is limited in extent and fleeting, however is over the last remaining area of sun on this street at the edge of Takutai Square at this time." **March 2026 observations:** The shading effect at this time over Britomart and Quay Street beyond is rated in table 3.1 as 'moderate'." The overall significance of this shading effect on Takutai Square is rated as 'negligible/low'. This is because: • The 'moderate' rating for equinoctial shade referred to the entire area of shadow cast and adjustment must be made for considering only part of that; • Shading effects must be considered throughout the year and no shade will be cast on Takutai Square in either mid-summer or mid-winter; • The part of Takutai Square which is shaded at this time is Tyler Street and street carriageways are relatively insensitive; and • Takutai Square is not an identified space for sunlight control. H8.8.2 (8A) (b) (i) suggests for the purpose of assessment of shade to waterfront public open spaces that there is a requirement to specifically determine the extent of shade from the parts of the building that is above the HEHCP. Graphic analysis below demonstrates that the shade on Tyler Street (assuming that is part of Takutai Square) arises from parts of T2 that are below the HEHCP. The rationale for this finding is: a) Measured at the centreline of the building, that part of T1 below the HEHCP is the lowest 69% of building height. (see annotated extract form figure 2.10) b) The plan diagram shows that the shade cast over Tyler Street will be from the rear half of T1. The centreline of T2 is at 0.686 of the height (H), rounded to 0.69H

Auckland Council feedback	Shading of identified public spaces MUL Urban Design Response – includes extracts from MUL UDA
	c) As the length of shadow has a direct linear relationship to the height of the building, the shadow cast by the uppermost 31% of T1 can be identified, and it is well beyond Takutai Square at this time. d) Because the length of the shadow in the Sep 23 – 05_00PM shading diagram is truncated by the frame of the drawing, the point where shade from the infringing top of the building occurs will be further beyond Takutai Square than shown on this diagram.
 Figure 2.10 from MUL report with overlay identifying portions of T1 above and below the HEHCP. (H = total height of T1)	 Sep 23 - 05_00 PM Warren and Mahoney shading diagram with overlay which demonstrates that the shade from the part of the part of T1 that is above the HEHCP does not impinge on Takutai Square at this time.
FTAA Downtown Car Park (25 Feb. 2026) Key shading concerns for the public open spaces remain: Te Komititanga Mid-Summer 5pm.	**SHADING ON TE KOMITITANGA / QE SQUARE – OUTSIDE THE UNITARY PLAN IDENTIFIED DATES AND TIMES** The Unitary Plan identifies shading controls on Te Komititanga / QE Square over the winter months from April 1 to September 30. During that period sunlight control applies from 11.30am to 2.00pm. Following detailed analysis and with reference to the rating scale, the effect of fleeting shade over a limited part of Te Komititanga only occurring in the late afternoon in mid-summer is negligible. See detail from the MUL assessment below: MUL assessment of shading effects on Te Komititanga at page 40: "Some additional shade is cast over part of Lower Queen Street, Te Komititanga. However, this is limited in extent and duration and occurs well outside the identified season and period for sunlight control of

Auckland Council feedback	Shading of identified public spaces MUL Urban Design Response – includes extracts from MUL UDA
	that space. Considering the whole year and limited extent and duration of additional shade, the shading effect on Te Komititanga/Queen Elizabeth Square will be 'negligible'. (Refer to table 3.2 Shading of public open spaces.)" In relation to shading from street setback infringement, MUL page 52) "The parts of the T1 and T2 which infringe the street setback standard will have nil or no appreciable effect on shading on Te Komititanga, St Patricks Square and the waterfront." Extract from Table 3.1 City centre shading assessment (page 68) 5pm Mid-Summer 21 December "At this time the upper parts of the proposal cast shade onto the roof spaces of Commercial Bay and part of Te Komititanga Plaza (Queen Elizabeth Square). This additional shade on Te Komititanga is limited in extent, outside the winter period April 1 to September 30 when sunlight control applies and outside the identified times between 11.30am and 2.00pm for that control." 3.3 Shading of nearby public open spaces (page 69) "Sunlight controls are identified in the Unitary Plan for only two nearby spaces: St Patrick's Square and Te Komititanga (Queen Elizabeth Square). In addition to the spaces and at times specified by the Unitary Plan, this analysis assesses potential shading effects on these identified spaces outside the times identified by the Unitary Plan and also on all other nearby public open spaces that may receive some additional shade." Extract from Table 3.2 Shading of public open spaces (page 71) **"Te Komititanga/Queen Elizabeth Square** • The proposal does not cast shade over additional areas of Te Komititanga at either mid-winter or at the equinox. • At 5.00pm at the summer solstice, the upper parts of the proposal cast shade onto part of Te Komititanga. Shade continues to be cast but to a lesser degree at 6.00pm. This shade is received outside the winter period April 1 to September 30 when sunlight control applies. It is also outside the identified times between 11.30am and 2.00pm for that control. The summer shading effect is rated 'low'. That is because while it is over an area of identified significance, additional shade is restricted in area and fleeting in duration. Considering the whole year and limited extent and duration of additional shade, the shading effect on Te Komititanga/Queen Elizabeth Square will be 'negligible'." Summary observation (page 75) "The proposal does not cast shade over Te Komititanga/Queen Elizabeth Square at the times of day and year identified by the Unitary Plan. However, limited and fleeting shade is cast over Te Komititanga/Queen Elizabeth Square in the late afternoon at mid-summer. The effect of that additional shade is 'negligible'."

5. DETAILED DESIGN AT GROUND LEVEL IN RELATION TO WIND, CANOPIES AND HOTEL DROP-OFF AREA

a) Wind effects at ground level and in relation to canopy design are primarily for the wind consultants and architects to address.

b) In the same area on Customs Street West, Council has identified potential to consider threshold and/or additional planting at the hotel vehicle drop-off area. This is primarily for Warren and Mahoney to address.

c) There is merit in discussing the Customs Street West edge shelter and hotel drop-off pick-up area with Council's urban designer.

Document 3 Auckland Council Final Urban Design Memo	**MUL Urban Design Response – includes extracts from MUL UDA**
Key Urban Design Issues (25 March 2026) **4. Verandah Cover and Customs Street West Interface** A verandah is not provided along the Customs Street West frontage, which represents a departure from the intent of H8.6.26. While some localised cover is achieved through soffit zones and recessed building edges, this does not provide continuous weather protection along the public footpath. The proposal incorporates covered laneways and internal routes, which offer alternative sheltered pedestrian movement, and this is a positive aspect of the design. However, these do not fully substitute for continuous street-edge weather protection along the public streets. Providing a verandah in this location could also have contributed positively to wind outcomes. Pedestrian comfort is further compromised in this interface with the proposed Hotel Drop-off area. There could be some improved outcomes for the drop-off area. Some preliminary thoughts are illustrated below, Figures 4-5. **FTAA Downtown Car Park (25 February 2026)** **[HOTEL DROP-OFF DETAILED DESIGN]** The Urban Design Specialist is of the opinion that the drop off area could be improved with some suggestions below, Figures 1-2. Further consideration of the design of this area is requested.	**Verandah cover and wind effects resolution** The proposal does provide some shelter, although as identified by Council that does not comply with the Unitary Plan verandah standard: • There is cover with that at high level along the edge of P1 which extends over the stairs that connect ground (L-00) with the podium plinth (L-01). That gives continuity with the verandah shelter at the base of Aon House which is also elevated at this level. • There is shelter further west for pedestrians moving around the rear of the hotel drop-off area; and • As Council has identified, during inclement weather, there is a choice of mid-block sheltered route(s). In this context, and putting aside any further required wind mitigation, the extent of cover provided by the high-level overhangs at the street edge may be suitable. Wind effects and suitable mitigation are addressed by Holmes NZ LP. **Hotel drop-off detailed design:** There may be scope at the time of detailed design to consider these matters further:

Figure 1. Proposed Porte Cochere / Hotel PUDO. Utilises the same paving as the main pedestrian circulation and has a very minimal landscape buffer between the footpath and the transition from the street footpath, and the drop of area can be improved. footpath and the transition from the street footpath, and the drop of area can be improved. Figure 2. A) The landscape buffer can be more prominent. B) A transitional pavement can be considered between the footpath and the drop-off carriageway. C) The planter elements can be further extended to buffer between the pedestrian circulation and drop-off area.	• The proposal presents the paving as a shared surface on which all users, being uncertain about what other users may or may not do, take particular care. More explicitly defining the vehicle movement area raises the possibility that drivers will be less likely to defer to use by pedestrians. • Threshold (paving) definition might be explored. However, this should be done with care and it is possible that extending planters will lead to visual clutter and inconvenience for pedestrians.
Key Urban Design Issues (25 March 2026) **2. Wind conditions:** The proposal incorporates wind mitigation measures; however, certain areas continue to experience elevated wind conditions (non-compliance). While some refinements have been made, further mitigation, including potential extension of canopy coverage or similar design responses, would improve pedestrian comfort along surrounding streets. **Final Urban Design Memo (30 May 2025)** While some amendments were made to the podium canopy as design mitigation, the proposal still generates Category D wind effects. Further design mitigation should be explored e.g. Further extending the podium canopy area or exploring other and similar options.	To be addressed by Architects and Wind Consultant.
Final Urban Design Memo (30 May 2025) (WIND EFFECTS) **4.5.9** Wind effects are a significant concern and require careful consideration under Standard H8.6.28 of the Auckland Unitary Plan (OP), which seeks to mitigate adverse wind effects generated by high-rise buildings. **….e**ven in the mitigated scenario, Category D wind effects persist on Quay Street, and new instances occur along Lower Albert Street, Customs Street West, and the proposed Urban Room (Te Urunga Hau). **4.5.11** While the applicant proposes mitigation through street planting, this is not considered sufficient from an urban design perspective.	To be addressed by Architects and Wind Consultant.

Final Urban Design Memo (30 May 2025) **In response to submissions** *[unnumbered]* ***Lack of weather protection from lack of verandahs*** The proposed outcome for the verandah cover can be supported on balance, as assessed in Sections 5.2.4-5.2.5	Council supports the proposal in relation to these matters, but subsequently in FTAA-Downtown Car Park memo (25 February 2026) questions the extent of cover.
Final Urban Design Memo (30 May 2025) **5.1.2** Considers that Lower Hobson St entrance to T2 apartments is not sufficiently "unique" or "differentiated" from the retail frontages/ entries there.	This is a relatively inconsequential matter of fine detail that can be easily remedied if and as required.

6. DAYLIGHT ANALYSIS AND ASSESSMENT

a) In referring to infringements of H8.6.24., Auckland Council (UD Addendum re PC78, 12 June 2025) contend that:

> "no daylight modelling or assessment has been provided by the applicant to demonstrate compliance with the daylight-related objectives. The absence of such data limits the ability to fully assess whether the proposal achieves adequate daylight access around buildings, as sought by the revised standard."

This follows from Auckland Council concerns in the Final Urban Design Memo (30 May 2025) that daylight effects have not been assessed:

- In relation to ***loss of daylight through height and scale of buildings*** *Council advise: "* At this stage, there is no supporting data or assessment provided by the applicant to enable meaningful comment on the extent of daylight loss."
- Council also contend in "that a daylight analysis was not provided by the applicant, as noted previously."
  and
- [Regarding infringement of maximum frontage height H8.8.2(() (d) (i)] "Shading effects on public spaces are assessed in detail; however, no daylight analysis was provided as well as a comparative assessment."

b) Daylight access has not been modelled but has been assessed in detail as described in the table below.

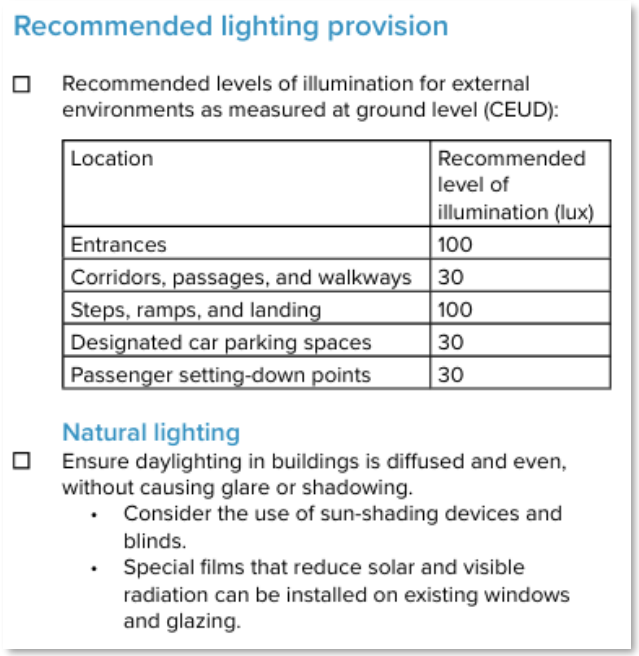
c) Auckland Council do not identify daylight analysis and assessment as a 'key issue' in the most recent communication of 25 March 2026.

Auckland Council Feedback	**Daylight Assessment** **MUL Urban Design Response – includes extracts from MUL UDA**
Final Urban Design Memo (30 May 2025) ***29. Loss of daylight through height and scale of buildings*** As part of the further information request, comparative shading analysis was requested. • At this stage, there is no supporting data or assessment provided by the applicant to enable meaningful comment on the extent of daylight loss.	Effects on daylight have been assessed. Text in the UDA on daylight is recorded in the table below in relation to the Unitary Plan matter that applies to demonstrate the extent to which this has been examined. Furthermore, given the openness around the site, the topmost parts of the building will have no appreciable impact on daylight, other than due to increased shading as modelled, a reduction of reflected light in certain instances. This in my opinion will rarely be to a level where there will be perceptions of compromise to daylight in the relatively wide-open public realm and reasonably distant buildings around the proposal.
[GM note: The text in italics below is parts of the Unitary plan that address daylight to provide the context for the response in the right-hand column.]	UDA page18 *Daylight and sunlight into buildings* Plan offset and separation of 15.03m between T1 and T2, and 11.2m between T1 and the existing Aon House ensures adequate sunlight and daylight into both the proposed towers and existing adjacent buildings. UDA page 18 *Daylight and sky views to streets* Daylight to streets is maintained due to the openness of Lower Hobson Street to the north, west and south, and the broad width of Lower Customs Street, Sturdee and Fanshawe streets combined.

Auckland Council Feedback	Daylight Assessment MUL Urban Design Response – includes extracts from MUL UDA
	The collective width of these streets allows generous daylight and broad sky exposure to be experienced.
• OAUP "*Maintains visual and physical connections and visual permeability to the Waitematā Harbour through the city centre by providing adequate airspace, sunlight, daylight and amenity around towers."*	*UDA page 38* "This intention and the spacings and modelling of building form required to achieve views plus sunlight, daylight and amenity are managed by the standards on maximum dimension, spacing and setback of towers (see assessment in in Section 2.4 of this report). Depending on which component of this collection of buildings is being considered, these standards are met or nearly met. Analysis in Section 2.4 details this and finds the proposed towers provide for adequate light, space and general amenity.
	UDA page 39: *Daylight* The parts of the towers that infringe the HEHCP are predicted to have an imperceptible or barely perceptible impact on daylight due to the extent of space around and exposure to the sky of streets spaces and buildings here. • Daylight to streets is maintained due to the openness of Lower Hobson Street to the north, west and south, and the broad width of Lower Customs Street, Sturdee and Fanshawe streets combined which allow extensive sky exposure to these streets. • The gaps between buildings across the site, with 32.3% of the width of the project site (from the edge of Lower Hobson Street to the façade of Aon House) remaining open, contribute to north sky exposure for Customs Street West.
Standard H8.6.24. Maximum tower dimension, setback from the street and tower separation *Purpose: ensure that high-rise buildings:* • *are not overly bulky and are slender in appearance;* • *provide adequate sunlight access to streets and public spaces;* • *provide a consistent human-scaled edge to the street;* • *provide adequate sunlight, daylight and outlook around buildings;* • *enable visual connections through the city centre; and* *mitigate adverse wind effects*	UDA page 46: *Sunlight and daylight access to streets and public spaces* • Adequate sunlight access is provided to streets and public spaces as examined in detail and identified in the shading effects study (Section 3.4). • Notwithstanding minor infringement of the 12m spacing between T1 and Aon House and the 1.52m shortfall in setback from Lower Hobson Street, the daylight around buildings can be expected to be better than adequate. This is because of the openness all around the site and the open shafts through the site (described on figure 2.29) which provide good sky exposure. UDA page 47*: Sunlight, daylight and outlook around buildings* Considering T1 in relation to T2: • The 15.35m (glass-to-glass) distance between the towers in combination with the plan offset of T2 from T1 well exceeds the standard to ensure better than adequate sunlight, daylight and outlook between these buildings. Considering T1 in relation to Aon House: • Aon House is 11.5m (glass-to-glass) to the east of T1. This is close to meeting the standard and allows sufficient separation to allow adequate sunlight, daylight into and outlook from the offices in these buildings. Considering T2 in relation to the Viaduct Harbour Precinct to the west: • Any building along the western side of Lower Hobson Street in the Viaduct Harbour Precinct is permitted to rise to 24m above

Auckland Council Feedback	Daylight Assessment MUL Urban Design Response – includes extracts from MUL UDA
	ground. This is directly across the street and 32.9m away from the proposed podium P2 which rises to approximately 31.4m above ground. • T2 rises above that podium and is set back a further 4.48m for a total separation distance of 37.4m. The additional 0.95m façade width of T2 will have no appreciable effect on outlook from those buildings or any other view from the Viaduct Harbour.
Assessment criteria for infringement of setback from the street and tower separation in special height area and building setback from boundaries standards: [H8.8.1 and H8.8.2] *(a) effects of additional building bulk and scale on neighbouring sites, streets and public open spaces (sunlight and daylight access, dominance, visual amenity, and landscape character);*	UDA page 51: *Daylight access* Those parts of the proposal above the podium, that is T1 and T2, are set back from the boundary, offset and angled in plan and suitably separated so that adequate daylight will be maintained around them.
Policy H8.3(31) *Ensure adequate sunlight, daylight, and outlook around buildings.*	UDA page 53: Adequate sunlight, daylight, and outlook around buildings is provided for as described above in Table 2.3: 'Maximum tower dimension'. Furthermore, the clearances for outlook around the T2 residential accommodation far exceed the 6m outlook space dimensions (refer to Section 6.1).
Policy H8.3(38) *Ensure adequate sunlight and daylight to public open spaces and streets.*	UDA page 53: In addition to daylight as addressed above, adequate sunlight access is provided to streets and public spaces as examined in detail and identified in the shading effects study (Section 3.4).
(xixb) the extent to which adequate separation between buildings is provided: • *to ensure sunlight and/or daylight reaches the street*	UDA page 54: *Sunlight and daylight access to streets and public spaces* • Adequate sunlight access is provided to streets and public spaces as examined in detail and identified in the shading effects study (Section 3.4). • Notwithstanding minor infringement of the 12m spacing between T1 and Aon House, and shortfall in required 6.0 setback from Lower Hobson Street the daylight around buildings can be expected to be better than adequate. This is because of the openness all around the site. Complementing that is the separation of towers which allows for shafts of sky exposure through the site and therefore contribute to the extent of daylight that will received. See also assessment of shading to streets in Section 3.4 'Shading to surrounding street network' which makes the following summary observation: • This analysis demonstrates that adequate sunlight is maintained to the surrounding street network. The worst-case events of shading on the surrounding street network throughout the year are highly localised and limited in extent and duration and are at most of 'low' significance.

Auckland Council Feedback	Daylight Assessment MUL Urban Design Response – includes extracts from MUL UDA
	P103: The lanes are suitably wide with glazed roofs so are both sheltered and open to daylight and sun. P105: The Urban Room is open to the sky to the north for very good sunlight and daylight. (Refer to Section 3.6 for sun and shading analysis).
	Furthermore, **CONSIDERING OUTDOOR DAYLIGHT LEVELS** There are no daylight standards for the public realm. Light level standards for outdoor spaces instead relate to ensuring suitable artificial lighting and avoiding restricting light spill after dark. The qualitative assessment of daylight in the UDA is based on professional judgement. However, to test this issue from another perspective, the levels of daylight that can be expected to be received is compared below to some related standards for lighting. These are the artificial lighting levels for external environments recommended by the Auckland Design Manual, and the New Zealand Building Code requirement for natural light inside buildings. This simple comparison shows that • the extent of daylight around a building vary widely (refer to [1] typical outdoor daylight levels below), • it will under even overcast conditions be much higher than the lighting level required in buildings (refer to [2] New Zealand Building Code, and around buildings (refer to [3] Auckland Design Manual – noting these ADM levels are for artificial light after dark. 1. **Typical outdoor daylight levels** vary in accordance with weather and time of day. A UK source (geenbusinesslight.com/resources/lighting-lux-lumens-watts, sourced 16/03.2026) identifies typical lux as follows. **Natural Light Condition** / **Typical Lux** Direct Sunlight — 32,000 to 100,000 Ambient Daylight — 10,000 to 25,000 Overcast Daylight — 1000 Sunset & Sunrise — 400 Moonlight (Full moon) — 1 Night (No moon) — < 0.01 2. **The New Zealand Building Code**, Clause G7 'Natural Light gives context for daylight inside buildings: **Functional requirement** **G7.2** *Habitable spaces* shall provide *adequate* openings for natural light and for a visual awareness of the outside environment. Requirement G7.2 shall apply only to *housing*, old people's homes and early childhood centres. **Performance** **G7.3.1** Natural light shall provide an *illuminance* of no less than 30 lux at floor level for 75% of the *standard year*.

Auckland Council Feedback	Daylight Assessment MUL Urban Design Response – includes extracts from MUL UDA
	3. The Auckland Design Manual Universal Design Checklist for Lighting Design (see below) identifies recommended lux levels for external illumination after dark.  **Recommended lighting provision** ☐ Recommended levels of illumination for external environments as measured at ground level (CEUD): Location / Recommended level of illumination (lux) Entrances 100 Corridors, passages, and walkways 30 Steps, ramps, and landing 100 Designated car parking spaces 30 Passenger setting-down points 30 **Natural lighting** ☐ Ensure daylighting in buildings is diffused and even, without causing glare or shadowing. • Consider the use of sun-shading devices and blinds. • Special films that reduce solar and visible radiation can be installed on existing windows and glazing. For further comparison, office floor plates are usually lit to around 500 lux.

END