
To:	Sarah Wilson – Senior Planner (Auckland Council (“AC”)) Adonica Giborees – Principal Project Lead (AC)
From:	Martin Peake, Director – Progressive Transport Solutions Ltd (“PTSL”) (On behalf of Auckland Transport; & Nicholas Simpson, Director & Planning Consultant – Elevate Planning Ltd (<i>On behalf of Auckland Transport</i> (“AT”))
Date:	25 March 2026
Subject:	BUN60460864 / FTAA-2512-1158: The Downtown Carpark Redevelopment – Te Pūmanawa o Tāmaki – s67 & Red Flags Memorandum

1. Introduction

1.1 This memorandum presents a summary of key issues from an initial review of the lodged documentation for the Downtown Car Park Fast Track Application. The following documents have been reviewed:

- Assessment of Environmental Effects, Barkers, 18th December 2025;
- Appendix 13 – Operational Integrated Transport Assessment, Flow, November 2025;
- Appendix 14 – Draft Construction Management Plan, RCP, 9 October 2025;
- Appendix 19 – Infrastructure Concept Design Report;
- Appendix 23 – Flood Hazard Risk Assessment;
- Appendix 24 – Proposed Consent Conditions;
- Appendix 26 – Draft Construction Traffic Management Plan, Flow, November 2025;
- Appendix 29 – Draft Servicing and Loading Management Plan, Flow, 6 November 2025;
- Appendix 28 – Environmental Winds Report, Holmes Consulting, 29th October 2025;
- Appendix 30 – Draft Hotel Pick Up and Drop Off Management Plan, Flow, 6 November 2025;
- Appendix 31 – Draft Managed Access Service Arrangement, Flow, 3 November 2025;
- Appendix 40 – Demolition and Construction Transport Assessment, Flow, November 2025; &
- Appendix 41 – THSA Hotel Advisors Report

1.2 The review and comments are intended to draw the applicant’s attention to the key issues identified that either require clarification or should be addressed by the applicant. . For the avoidance of doubt, the review comments provided in this email reflect the combined assessment of PTSL’s Director, Martin Peake, and Elevate Planning’s Director, Nicholas Simpson on behalf of AT.

1.3 Set out below are the issues identified in each of the documents reviewed. As some of the documents have overlapping subjects there is some overlap between the issues identified.

2. Summary of Key Issues

2.1 Summarised below are the key matters that have been identified in the review of the documentation.

- a) The assessment provided is based on the current road network forming part of the receiving environment. AT concur with this interpretation; however, the applicant has been advised that a separate application for resource consent(s) to enable changes to Customs Street West has been submitted and is described by Council as BUN60462925. Should this application be granted prior to a determination on this Fast Track Application being made, it would mean that the assessment provided to date would accurately capture the transport network that forms part of the receiving environment. Notably, this could change the outcome of AC's and AT's assessment whilst the Fast Track Application is being processed;
- b) The proposed management plans lack detail in terms of the key objectives of the plans, outcomes sought by the plans and the measures that will be implemented;
- c) The management plans need to be regularly reviewed and this should be included in the consent conditions. Of particular importance is the Hotel Pick Up and Drop Off Management Plan; this should include a review condition three months after the opening of the hotel;
- d) Notwithstanding that additional information has been identified as key information gaps to understand how the hotel PUDO will operate, AT's SMEs have raised significant concerns regarding the operation of the facility in terms of the reasonableness of the recommended management measures; suitability of the function of the constrained and reasonably short layout; and future integration with an area that has been identified for future redevelopment under the City Centre Master Plan, which has been intended for significant public realm improvements;
- e) The ability to manage the forecast number of heavy vehicles on the Lower Hobson Street slip lane needs to be demonstrated, taking into account the time taken to load or unload trucks. If the anticipated numbers are unable to be managed within the site this could impact on the operation of the Lower Hobson Street / Customs Street West / Sturdee Street intersection and the passage of buses; trucks may be forced to recirculate around the City Centre thereby unnecessarily increasing heavy vehicle movements. Furthermore, if the anticipated number of trucks cannot be managed, this could increase the demolition and construction time frames;
- f) AT's SMEs are open to further discussion regarding the potential for allowing a limited number of arrivals and departures of heavy vehicles during peak periods, subject to suitable management including appropriate monitoring and response measures. Whilst the assessment provided by the applicant shows that the buses are not adversely affected at peak times, there remains concerns in terms of the practicality of managing the number of forecasted heavy vehicles within their site and intended laydown areas and

whether this may result in queuing of vehicles into the adjacent Sturdee Street bus lanes. Specifically, this includes i) there is insufficient capacity on Lower Hobson Street to accommodate the number of trucks forecast, (ii) trucks have to wait for pedestrian to clear the pedestrian crossing under Lower Hobson Street, (iii) unscheduled trucks or other construction vehicles (such as workers cars or vans) use the access. This has the potential to adversely impact the operation of key bus routes, including the western shore services, Northern Express (“NX”), and a number of out of service buses including the Western Express (“WX”), which are services that cater for a significant portion of commuters;

- g) The need for safety zones around vehicles loading and unloading on Lower Hobson Street and Customs Street West, particularly for crane operations, need to be identified alongside clarifications regarding the proposed construction methodologies (such as those relating to sheet piling installation and the proposed use of the tower cranes) as these may result in effects on the bus lane on Customs Street West; need for increased space for construction work zones either within the shared access lane or along Customers Street West; and limitations in the operation of truck movements on Lower Hobson Street;
- h) A safety assessment is required as to the effects on the adjacent road network where materials are craned from trucks on Lower Hobson Street or Customs Street West as this activity could be a distraction to road users on the flyover or a pose a hazard for areas under goods being moved;
- i) A series of measures are proposed to reduce wind speeds, which is reliant upon being installed within the road reserve which the applicant does not maintain direct control over. It is possible that the measures proposed could be removed, should AT be required to undertake works within the road reserve or if the future condition of the road requires to be changed;
- j) The proposed stormwater and wastewater extensions involve the positioning of new pipes and supporting assets within the road reserve, where the applicant’s supporting assessment of adverse construction impacts does not specifically address such works. Further information is required to understand whether this may materially alter any of the conclusions reached within the applicant’s assessment to inform what mitigation measures, including any necessary principles of the Construction Traffic Management Plan (“CTMP”). need to be in place to maintain the effective function and safety of the surrounding transport network. Deferring these extensions to Engineering Plan Approval (“EPA”) stage is not an outcome that is supported by AT, as these works have the potential to materially impact the conclusions reached within the applicant’s assessment of how any adverse construction impacts are to be managed;
- k) The options presented for managing adverse stormwater and wastewater impacts has been discussed with AT’s SMEs. For wastewater, AT supports Options (3) for the inclusion

of on-site storage of wastewater and off-peak pumping and (5) through the incorporation of a pipe bridge across the footbridge connecting Commercial Bay to the HSBC / Aon Buildings. The proposed trenching included in Option (5) is not a supported outcome, due to the significant investment that has been spent on upgrading the existing facilities and maintaining the integrity of Lower Albert Street alongside the complexities with the services located within the existing carriageway; &

- l) Access to the M Social service bay and the Managed Access Service Arrangement Plan should be developed in consultation with M Social prior to granting of consent.

3. General Comment

- 3.1 The assessments provided have been based on the current road network. Whilst this is the correct interpretation of what constitutes the receiving environment, the applicant has been advised that AT has submitted an application described by Council as BUN60462925 that involve significant changes to the surrounding transport network.
- 3.2 The intention of these works is to enable the future delivery of the flyover delivery and broader redevelopment of the transport network within the immediate vicinity of the subject site. This application is comprised of the relocation of the retaining wall between Fanshawe Street / Customs Street West to enable the relocation of the Northern Express ("NX1") bus service and reduction to a single lane eastbound, post-development, between the service lane between the subject site / HSBC building and the intersection of Lower Albert / Customs Street West. The flyover is anticipated to remain in place following completion of these works and is anticipated to be subject to a future application for resource consent(s) being prepared and submitted by Auckland Transport. It is likely that the timing of Auckland Transport's application will be determined first, at which case the receiving environment will incorporate a revised transport network as modified by this application. Consequently, the applicant's assessments, including any demolition; construction; and post-construction / operational related effects, would need to be updated to take into account the future transport network should Auckland Transport's application be granted first. If BUN60462925 is to form part of the receiving environment, AT's assessment pertaining to adverse construction related impacts upon the surrounding transport network must take into account whether this would give rise to adverse cumulative impacts, if the works sought via this application and those included in BUN60462925 are implemented concurrently, and to ensure that the management measures set out by the applicant remain suitable with the revised road network. It is acknowledged that other parts of AT, responsible for delivering the works in BUN60462925, intend to present their preferred interim and permanent road layout to the applicant within the near future.
- 3.3 Various management plans have been developed in relation to managing traffic effects. The management plans should provide greater detail as to the measures that will be implemented, particularly where the Operational or Demolition and Construction Assessment reports have detailed mitigation or management measures. Furthermore, the documents should set out clear objectives and frameworks that the management plans are intended to achieve and/or the effects to be addressed.

4. Operational Integrated Transport Assessment

- 4.1 The Downtown Precinct I205 sets out requirements for a north-south pedestrian connection between Customs Street West and Quay Street. The commentary in ITA Section 7.2.5 states that the facility is “*mainly to serve the needs of staff moving around the loading dock*”. However, the lane is open to the public and 24/7 access is understood to be enabled. Therefore, its suitability; accessibility for all users, including those with mobility impairments; and attractiveness for use by the general public as a route to connect from Customs Street West to Quay Street should be assessed to demonstrate how the path achieves the intent of Precinct Standard I205.6.2. It is acknowledged that consent has been applied for to infringe this standard, however technically we are of the view that no north-south connection is achieved noting that the alignment of the connection with the existing Aon pedestrian access will achieve somewhat of an east – south alignment through the wider block.
- 4.2 The ITA Section 5.4.2 highlights that the layout of the Quay Street access has recently been updated including the provision of bollards on the eastern side to delineate the pedestrian and vehicle manoeuvring areas. It should be confirmed that the proposed layout of the Quay Street access takes into account that the revised layout.

Hotel Operation / PUDO

- 4.3 The hotel has a pickup and drop off (PUDO) area for cars and small vans. There are no details as to how the hotel will be serviced by coaches or whether there is a functional need for incorporating coach parking facilities, noting that the intent is to achieve a five star hotel. Appendix (41), which includes information regarding the operational requirements of a five star hotel, is silent on whether the provision of coach facilities is essential for achieving the five star experience. These details are required to understand if there will be a future need for the provision of coach parking facilities and if this is not achievable, whether there would be a need for parking and routes that would be taken between the hotel and the coaches, particularly if luggage is to be carried between the hotel and the coach parking location.
- 4.4 If there is a functional need for the provision of coach facilities to achieve a five star standard and this could not be achieved, whether this would mean that the facility would accommodate a four star hotel and materially affect the management of the porte-cochere from what has already been assessed.
- 4.5 The PUDO access amends the layout of the Customs Street West / Lower Hobson Street intersection. The revised layout sets back the limit lines from Lower Hobson Street so that they are level with each other. This will create sight line issues for vehicles in the kerbside lane being able to see past a vehicle in the second lane at the limit line. This is the reason for the stagger in the existing arrangement. Furthermore, the layout is unusual with vehicles from Customs Street West cutting across Lower Hobson Street at an unusual angle to the intersection. Motorists travelling to the hotel who are unfamiliar with the arrangement could be confused by the layout and make a sudden turn to enter the PUDO. This may not be expected by motorists on Lower Hobson Street slip lane, motorists travelling along Customs Street West (from Sturdee Street) or buses using the Customs Street bus lane. AT's SMEs have raised significant concerns over its layout and operation.

- 4.6 The applicant needs to demonstrate how the hotel PUDO will operate for a van entering the area if there are vehicles already parked e.g. cars in the parking bays. The van and trailer should be able to enter the site fully clear of the road reserve so as not to impact on vehicles on Lower Hobson Street or pedestrians on the Customs Street West footpath. As described in the report, if the car parks are full then additional vehicles would need to drive through and exit the site. This should include vans with trailers. Vehicle tracking should be provided to show that this can be achieved by vans entering from both Lower Hobson Street and Customs Street West.
- 4.7 In addition, tracking should be provided to demonstrate that a car would be able to enter the eastern car parking space if there is already a vehicle in the western car park.
- 4.8 The report states that vehicles within the PUDO would have a limit on the length of stay (3 to 5 minutes). The survey of the comparative hotel used to assess the utilisation of the PUDO should include details of the number of vehicles using the facility, including cumulative occupancy, and the dwell times of vehicles. This would assist in understanding the possible number of vehicles that would need to be moved on if there is no space for them to stop. Vehicles being moved on if there is no space for them to stop will increase the number of vehicle movements associated with the PUDO.
- 4.9 An assessment is needed to demonstrate that there is sufficient capacity within the PUDO for the hotel to accommodate the forecasted users. If vehicles are moved on frequently when there is no space for them to park, then this will add to the general traffic on the network and increase the vehicle movements to and from the PUDO (an additional entry and exit movement for each vehicle that is moved on).
- 4.10 To understand how the gradients work for the interface between the porte-cochere and surrounding plaza / pedestrian footpaths, cross sections through the porte-cochere starting from the road carriageway through to the pedestrian plaza are considered necessary to demonstrate that safe and compliant gradients will be achieved.
- 4.11 Further detail is required on the design of the Porte Corche in relation to how vehicle movements will be separated from the pedestrians movements in the Plaza and the public footpath along Customs Street West.
- 4.12 Basement PUDO
- 4.13 There are no details available in order to establish how the nine casual spaces contained within the proposed basement car park, assigned to the use of either the residential or office components, are to be accessed by future users. Further details should be provided in order to establish how users are to book such spaces, which might be able to be addressed within the Loading and Servicing Management Plan.

Cycle Access

- 4.14 The suitability of cycle access via lifts to the cycle parking areas needs to be considered carefully given the number of bike parks proposed and the emphasis provided on the use of cycling from the site. This should include the size and capacity of lifts and the manoeuvrability

of cycles within the buildings when wheeling cycles to and from the lifts and bike parking areas.

Trip Generation (ITA Section 9.2.1)

- 4.15 The trip rates associated with the servicing of the residential component appears to be very low. It is based on the hotel servicing, which is not appropriate for the intended use. However, the demand for servicing associated with residential uses involves other considerations such as the delivery of larger goods and services (i.e. furniture) and the likes of residents who may be looking to relocate into the proposal / move elsewhere. Further consideration of the required trip rate for the residential component is considered necessary factoring in the demand for other servicing associated with the dwelling use to suitably establish any adverse effects upon the surrounding network with respect to the Vehicle Access Restriction ("VAR").

Traffic Modelling (Section 9.4.1)

- 4.16 The signal phasing for the signalised intersections used in the SIDRA modelling should be provided to be able to confirm the proposed phasing is appropriate for the revised intersection layout(s).
- 4.17 To assist in assessing the effects of the construction traffic on the Customs Street West / Lower Hobson Street / Sturdee Street intersection, SIDRA model Lane Summary output should be provided as well as the Movement Summary.
- 4.18 Traffic volumes on Lower Hobson Street in the future year model are very low (1 to 6 vehicles). This does not appear realistic as not all existing vehicles using the Lower Hobson Street slip lane travelling to Customs Street West will be destined for the Downtown Car Park. The volume of traffic on the Lower Hobson Street slip lane should be reviewed.

5. Hotel Pick Up and Drop Off Management Plan

- 5.1 Should the Hotel Pick Up and Drop Off Management Plan (HPUDOMP) not be effective in managing traffic within the PUDO, there will be adverse impacts on the safe and efficient operation of the road network. Details are required of what further measures could be implemented, outside of an increase in the number of staff that could assist in the unloading / loading of vehicles, to safely manage the PUDO if the proposed measures are ineffective.
- 5.2 The management plan objectives should include:
- Preventing queuing across the public footpath along Customs Street West; and
 - Avoid adverse safety and operational effects of the PUDO on the adjacent road network (such as the operation of the Sturdee Street/Customs Street West/ Lower Hobson Street intersection) either in its current or any future form.
- 5.3 The management plan should clearly set out what measures will be undertaken to manage the facility rather than what measures could be adopted (as currently stated in the plan).
- 5.4 The management plan has a description of potential signage and road markings. It is concurred that signage will be required; however, this is a matter for the design (which should be included in the consent) rather than the management plan. It is noted that signage of time

restrictions or vehicle types etc. will only be effective if motorists using the facility obey those signs.

- 5.5 Monitoring should include an assessment of the crash records in the vicinity of the PUDO, including adjacent intersections to determine whether the PUDO has affected safety of the road network.
- 5.6 The management plan is proposed to be reviewed “at least every 12 months”. The operation of the PUDO and the management plan should be reviewed 3 months after opening of the hotel to determine whether the management plan is effective and if any changes are needed to the plan.
- 5.7 A review of the HPUDOMP should be triggered at the request of Council to respond to complaints received from the public or operational issues identified by Auckland Transport or Auckland Council that affect the safe and efficient operation of the adjacent road reserve. The review requirement should be included as a condition of consent.

6. Managed Access Service Arrangement Plan (M Social)

- 6.1 Evidence should be provided that demonstrates that the Managed Access Service Arrangement Plan (MASAP) has been developed in consultation with M Social. This is necessary to ensure that the plan meets the needs of M Social.
- 6.2 The management plan is very light on detail as to the mechanisms that will be in place to manage trucks arriving and departing the site. Further detail is required in the management plan as to the procedures that will be in place to manage trucks e.g. how construction staff will be notified of an arriving truck, the procedure for opening the barrier, procedures to ensure that there would always be construction staff available to manage trucks, etc.
- 6.3 Whilst the specific detail will be developed once a contractor is appointed and the details of the traffic management measures are confirmed, the MASAP should provide an outline of the anticipated procedures for managing the facility, including operational requirements e.g. maximum sizes of vehicle, target response times for opening the boom gate (to minimise potential effects onto Lower Hobson Street) etc., how access would be achieved if a delivery vehicle arrives outside of the normal construction working hours.
- 6.4 Traffic management will need to be designed to prevent general traffic from entering the area set aside for trucks to wait for the boom gate to open. Motorists could inadvertently turn into this space expecting to travel along Lower Hobson Street slip lane, particularly at the commencement of the works when the road network has just changed. If a motorist does do this, they would need to reverse out onto Lower Hobson Street which could be a safety issue. This could be addressed, in the MASAP by ensuring the design includes measures to avoid the general public from attempting to access the slip lane.
- 6.5 The plan indicates that modifications to the median island between the slip lane and the flyover will be made to ease the movement of trucks turning left from the loading dock onto the flyover. It also states that this is to be confirmed; it is noted that the Construction and Demolition Transport Assessment does not indicate that modifications to the median would be undertaken.

- 6.6 The vehicle tracking shows that the 8.0m truck exiting the site onto the Lower Hobson Street Flyover will run adjacent to the kerb of the median island. Therefore, there is a risk of damage to the kerbs, particularly as the movement is difficult to perform (as demonstrated by the vehicle tracking). Modification to the median island would assist trucks exiting the loading bay and would reduce the risk of damage to the median island. Given the long duration of the demolition and construction, a permanent solution to ease the movement should be provided rather than risk the need for on-going repairs that will require traffic management on Lower Hobson Street.
- 6.7 The modifications to the median island should be confirmed as part of the consent as this affects the proposed operation and management of the loading dock; leaving the median island in its current location risks damages to the roading infrastructure with on-going repairs.
- 6.8 The plans show that the location of the gated area within the slip lane is to be moved further north towards the M Social loading dock in later stages of construction to allow access to the construction site. Relocating this gated area will impact on the ability of the M Social truck to be able to reverse into the loading dock. Details of how this would operate when the gated area is moved north are required as it would not be acceptable for trucks to reverse out of the M Social dock onto Lower Hobson Street.
- 6.9 For a 10.3m truck waiting at the boom gate, there is little, if any, clearance to the kerbside lane on the Lower Hobson Street Flyover. There is a risk that the 10.3m truck could overhang into the traffic lane, posing a hazard to vehicles travelling from the Quay Street intersection onto the flyover. The truck could be in place for a period of time, depending on how long it takes for the boom gate to be opened. Measures to minimise the risk of conflicts between a truck and traffic on Lower Hobson Street are required.
- 6.10 The document refers to 8.3m trucks, whereas the vehicle tracking has been undertaken for an 8.0m RTS18 truck. The tracking for an 8.3m truck on sheet 4 of 5 (refer to Appendix in Construction and Demolition Transport Assessment) shows that the 8.3m truck runs across the kerb when reversing in with less than 0.5m of clearance to the wall between the slip lane and Lower Hobson Street flyover. The maximum size of truck should be 8.0m to operate as shown (reverse in and forward out).
- 6.11 The design vehicle should be confirmed. Any restrictions on use should be determined based on the actual size of vehicles currently used in the loading dock. M Social should be consulted to determine the design vehicle.
- 7. Servicing and Loading Management Plan**
- 7.1 Details are required to understand whether during the demolition and construction phase, the existing servicing and loading arrangements that occur from the service lane for HSBC and AON buildings will be impacted, including the length of time that any portion(s) of the service lane is to be closed as works progress in resurfacing / enclosing this space. If these activities are impacted, how will these be managed and would there be an effect on the operation of the service lane and vehicle crossings on Quay Street and Customs Street West? Recommend that this aspect is separated out from the Servicing and Loading Management Plan, noting that the intention of this document should be focused on the management of post-

construction effects relating to the proposal. Potentially a better place for this is within the Managed Access Service Arrangement Plan, focusing on the proposed management measures to maintain the servicing for any existing activity located within the service lane. Consideration of any alternative(s) location for servicing any existing activity reliant upon the shared accessway is required, which should be supported by an assessment that is aimed at establishing whether any increased demand for loading might adversely affect the operation of Quay Street noting that the access along Customs Street West is anticipated to be closed for an undisclosed period of time.

- 7.2 The management plan says there will be core hours when the dock will be managed by a Dock Manager. What happens if a truck arrives outside of the core hours?
- 7.3 The management plan provides very little detail on the action plan (Section 4), with some of the items being design items rather than details of how servicing and loading will be managed. It should include greater detail as to how servicing vehicles will be managed to ensure that there is a space for vehicles in the loading bay, how traffic movements would be spread through the day to avoid peak periods etc.
- 7.4 Details of the procedures that would be adopted to manage unscheduled vehicle arrivals should be provided.

8. Construction Traffic Management Plan

- 8.1 The CTMP should clearly state what construction routes will be used rather than what is proposed to provide certainty that inappropriate routes will not be used by construction traffic e.g. Quay Street.
- 8.2 The CTMP should detail the hours of operation that will be permitted rather than anticipated. It is acknowledged that some activities will need to be undertaken outside of normal working hours e.g. demolition of the pedestrian footbridge and the car park ramp.
- 8.3 The CTMP Section 5.3 states that construction hours may be extended to allow for works to be undertaken outside of sensitive hours of neighbouring buildings. Clarification should be provided around when extended hours are to be undertaken, noting that it might influence the intended duration.
- 8.4 Section 6, Table 1 provides an estimate of peak hour truck movements. Discussions have taken place with AT's SMEs, who consider that there may be an ability to consider a limited number of arrivals and departures of heavy vehicles during the peak period. Taking a conservative view in that BUN60462925 forms part of the receiving environment, the undertaking of demolition concurrently with the works proposed in BUN60462925 would likely generate significant adverse cumulative impacts upon the network that would adversely affect the operation of the Lower Albert Street / Customs Street West intersection, including (but not limited to) disruptions to key bus routes and journey times. As a result, it is considered necessary that restrictions during peak periods (7am – 10am and 4pm – 7pm Monday to Friday) that no heavy vehicles can arrival to or depart from the subject site for the entirety of any time where there is overlap with the works sought in the aforementioned consent. Outside of the period where both this proposal and BUN60462925 are being implemented concurrently, the SMEs are open to considering a number of vehicle movements, 12 vehicles / 24 movements as a starting

point, during the same peak periods on the proviso that appropriate monitoring is undertaken at key intervals, which include provisions for further restrictions on the maximum number of heavy vehicle arrivals and departures should the results of any monitoring identify any reductions to bus journey times.

- 8.5 Should conditions relating to the restriction on maximum truck movements during peak hours either be imposed by the Panel or adopted by the applicant, consideration should be provided to outline the revised duration and programme of works that may result from reduced numbers of movements that would be permitted during these peak period restrictions. As a result, the applicant should provide some consideration to whether working before the morning peak period and/or post-evening peak is feasible.
- 8.6 Section 7 deals with contractor parking. There will be a need for contractors to travel to the site to drop off tools, equipment, and materials.
- 8.7 The CTMP should provide details as to how these vehicle movements will be managed and where these vehicles would access the site. The use of the access under the Lower Hobson Street flyover is not appropriate as this will increase the number of vehicles using the bus lane to access the site. Furthermore, it will increase the number of vehicles within the Lower Hobson Street slip lane area which is proposed to be used for trucks to access the site. This would impact on the operation of this area with potential knock-on effects to the Lower Hobson Street / Sturdee Street / Customs Street West intersection as non-truck movements would be difficult to coordinate. Additional vehicles in the Lower Hobson Street slip lane area increases the risk of trucks or other vehicles backing up into the bus lane. Similar restrictions regarding the arrival to and departure of light vehicles during peak hours, with reference to the planned works included in BUN60462925, should be considered as part of the management included within the CTMP.
- 8.8 This detail is required as it is noted that it will not be practical for trades people to travel by public transport with tools and equipment or to carry equipment from car parks located away from the site.
- 8.9 The CTMP should provide greater certainty over the proposed management measures as determined by the traffic assessment. It is acknowledged some detail will need to be developed once a contractor is appointed and consent is granted; however, it is important that the measures set out as mitigation or to manage the effects of construction are detailed in the CTMP rather than left to potential further consideration or assessment at a later date. Language such as 'must' rather than 'should' or 'may' would provide that greater certainty.
- 8.10 The CTMP states that a short section of footpath would be closed between the Lower Hobson Street slip lane and Customs Street West. It is not clear which section is referenced here as the text states that the Lower Hobson Street and Customs Street West pedestrian routes would remain open. The section to be closed needs to be clarified, it is assumed it is the area highlighted in the image below. The reasons for the closure of the footpath along Lower Hobson Street should be set out in the documentation.



- 8.11 Section 11 sets out the Principles of the Temporary Traffic Management Plan (TTMP). The principles include minimising bus lane closures. Bus lane closures should be avoided, rather than minimised, at all times except for the necessary works where roads need to be closed (e.g. demolition of the pedestrian footbridge and removal of the car park exit ramp to Fanshawe Street).
- 8.12 The draft CTMP (and ultimately CTMP) should clearly set out all specific criteria that the traffic management must comply with so that it is clear to the person preparing the final CTMP the constraints for the management of construction traffic and mitigation measures that have been identified to manage the effects on the safe and efficient operation of the road network. This should include routes that must be used (and cannot be used) by construction vehicles, times that construction vehicles are able to access the site, restrictions on the number and/or types of vehicles accessing the site etc.

9. Construction Management Plan

- 9.1 The left turn into the site from Customs Street West to the Lower Hobson Street lane should not be permitted for safety and operational reasons. Access should only occur under the flyover.

Safety Zones around loading / unloading activities on Lower Hobson Street and Customs Street West

- 9.2 Safety zones around the proposed loading zone and indicative plant locations on Customs Street West and Lower Hobson Street should be identified, including for the operation of forklift trucks and cranes. This is necessary to understand whether this would affect the traffic lanes on Customs Street West, particularly buses.
- 9.3 There is reference within the CMP for the need to erect scaffolding surrounding the entirety of the site through the course of demolition and construction works. However, no details have been provided to establish whether the extent of scaffolding can be secured above the existing Class B Hoardings. Please clarify whether scaffolding can be erected above the proposed Class B Hoardings or alternatively demonstrate whether this will increase the amount of space surrounding the subject site / influence the positioning of any intended work zones proposed.

The purpose of this request is to understand whether this will increase the amount of space required within the road reserve to facilitate the required construction / adversely affect the surrounding network.

- 9.4 A loading zone as shown on Customs Street West (Figure 7 and 9) could impact the safety of adjacent lanes and need road closures (e.g. during crane operations). Furthermore, it could impact on the efficient operation of the loading areas along Lower Hobson Street as vehicle movements entering or exiting Lower Hobson Street may not be able to occur whilst a vehicle is being unloaded.
- 9.5 If vehicles are unloaded from Lower Hobson Street or Customs Street West via crane, this could pose a safety hazard to traffic on the Lower Hobson Street flyover (either due to distraction or potential for loads to swing towards or over the carriageway).

Other Comments

- 9.6 Figure 29 shows a temporary bridge structure extending beyond the B-class hoarding. It is not clear if this extends into the adjacent traffic lane. This could impact the operation of the bus lane or require the bus lane to be closed. Please provide drawings that show the footing / full extent of the proposed support structure and update the CMP accordingly.
- 9.7 As part of the considerations in relation to the CMP comments, the applicant is required to turn their consideration to whether the construction management approach includes the planned wastewater and stormwater network extensions and whether this may materially impact the amount of space required within the road reserve / suitability of the key management measures outlined within their overall approach (i.e. retention of class B hoardings etc).
- 9.8 The B-class hoardings will extend across the footpath. There are double-decker buses in the adjacent bus lane along Customs Street West. The clearance between the B-class hoarding and buses needs to be confirmed as this would need to comply with AT's Practice Note 6 - Vertical and Horizontal Clearance over and beside bus routes.

10. Demolition and Construction Transport Assessment

Section 6.3 Demolition of Car Park Ramp.

- 10.1 It is not clear if the bus lane on Customs Street West will be closed only during the weekend works to allow for supports to be erected for the ramp, or whether the bus lane would be closed from Weekend 1 until the ramp is fully removed. This should be clarified. If it is closed between the two weekends, the works should be undertaken on consecutive weekends.
- 10.2 The alternative route for HCVs from Fanshawe Street or Nelson Street is for them to be directed back to Hobson Street and the motorway. However, these motorway connections do not provide access to the eastern side of the city centre e.g. Port. Further detail is required on the alternative routes for HCVs travelling to the port. It is acknowledged that Figure 15 shows a route via Khyber Pass interchange, however, this is a substantial diversion.

Section 7 Construction Phase

- 10.3 Unexpected vehicles arriving at the site entrance under the Lower Hobson Street flyover will be directed to circulate around the block. Further details of the route trucks would need to take is required to understand the feasibility of redirecting trucks.
- 10.4 Crane operations are stated to be within the site and not affect live traffic lanes or areas used for construction vehicles. However, the plans show locations for trucks to wait to be offloaded on Lower Hobson Street and Customs Street West. This will require safety space around the vehicles as materials are craned off/on to trucks. This could impact on traffic lanes on Customs Street West, Lower Hobson Street flyover or the operation of the Lower Hobson Street slip lane. More detail is required over the safety zones around trucks being offloaded and the operation of cranes to understand whether safety zones are required during crane operations, and whether traffic movements on the lanes will be stopped while crane operations occur. This would impact on the operation of the Lower Hobson Street slip lane including ability for vehicles to enter the works area clear of the bus lane on Sturdee Street. Furthermore, material being craned off trucks on Lower Hobson Street could be a distraction for motorists on the Lower Hobson Street flyover, thereby posing a safety hazard. A safety assessment is required of the proposed operation to load or unloaded material on trucks on Lower Hobson Street and Customs Street.
- 10.5 There is also some confusion regarding the description provided within the CMP as it relates to the sequencing of the required basement construction and how this work will progress without requiring additional space within the road reserve. Specifically, Figure (24) suggests that three tower cranes will be installed within the subject site to facilitate the unloading of structural elements, such as piles and steel beams, to enable basement construction and Figure (32) suggests that a sheet piling rig will progress around the perimeter of the site, outside of the site boundaries, for pile installation. Practically, we are unclear on how the tower cranes can remain within the site whilst constructing the basement and how the sheet piling rig will undertake works without being located within the road reserve, which will ultimately result in additional space required for enabling the intended construction. Please provide further explanation on how the tower cranes are to be used to facilitate the proposed construction of the basement levels and how the proposed pile installation will occur. The purpose of this request is to confirm, with certainty, that cranes aren't going to be required outside of the boundaries of the subject site to facilitate the construction of the basement itself.
- 10.6 More detail is required around the proposed layout in the vicinity of the pedestrian crossing on Lower Hobson Street. Trucks will be tracking across this area. For safety, these manoeuvres will need to be managed. How the crossing operates outside of the construction times needs to be considered.

Section 7.1 Construction: Retention and Excavation

- 10.7 Trucks turning left from Customs Street West to enter the Lower Hobson Street slip lane should be avoided. The movement would need to be undertaken at a slow speed as it is effectively a U-turn and would impact on the operation of both Customs Street West general traffic lanes and the bus lane.

- 10.8 In the phase where trucks are reversing into Lower Hobson Street and then loaded on Lower Hobson Street. How will material be moved from the site and into the trucks? Will this impact pedestrians on Lower Hobson Street i.e. have to be stopped to allow material to be moved from the site to the trucks waiting on Lower Hobson Street.
- 10.9 How will the interface between trucks and pedestrians along Lower Hobson Street be managed as they move to and from the site? Will there be periods when the footpath will be completely closed, and if so, how long for? In the situation where trucks enter the site from Customs Street West, trucks may be required to wait on Customs Street West for pedestrians to crossing the site access; this would affect the movement of vehicles along Customs Street West, including buses.

Section 8 Pedestrian and Cyclist Mitigation

- 10.10 At the Lower Hobson Street slip lane pedestrian crossing under the flyover, it should be demonstrated that there is sufficient space for a truck to wait for pedestrians to cross Lower Hobson Street pedestrian crossing without blocking back into the Sturdee Street bus lane.

Section 10 Local Access Assessment

- 10.11 With the closure of the Lower Hobson Street slip lane traffic turning right from the slip lane to the western end of Customs Street West will be diverted. Diversion signage is proposed. The use of temporary traffic management diversion signage for extended periods (i.e. 5 years) is not appropriate. The signage may be useful for the first few months of the closure.
- 10.12 The assessment of the diversion should include details of the number of vehicles affected by the closure of the right turn movement from the Lower Hobson Street slip lane to Customs Street West.
- 10.13 Tracking for larger vehicles turning left from Sturdee Street into the western end of Customs Street West should be checked as the proposed closure prevents larger vehicles turning into the western end of Customs Street West from under the Lower Hobson Street flyover. This is necessary due to the loading zones on Customs Street West, and the closure of the slip lane may impact on the ability for heavy vehicle to reach the loading zones.

Section 11 Contractor Parking

- 10.14 It is not clear how will trades people will access the site to unload tools and equipment. Use of the access under Lower Hobson Street flyover would not be acceptable as this will add complexity to the operation of this facility and cannot be controlled, unlike the arrival of trucks.

Section 12 Construction Traffic Generation

- 10.15 The number of trucks is an estimate. If the contractor methodology differs from that assumed, the number of trucks could be significantly higher than proposed and thus the effect on the operation of the bus lane on Sturdee Street would be more significant.
- 10.16 Up to 24 trucks per hour are anticipated to use the access under the Lower Hobson Street flyover. It should be demonstrated, ideally supported by additional commentary by a contractor and/or buildability consultant, how this number of trucks can be accommodated

within the site and the Lower Hobson Street slip lane, considering the time required for trucks to be unloaded or loaded taking into account that vehicles are also intending to reverse into the proposed loading area. This could result in there being insufficient space to accommodate all the anticipated trucks. If 24 trucks per hour cannot be managed within the site, this could have implications for the demolition and construction timeframes.

Section 13.1 Assessment Methodology

- 10.17 M Social trips have been assigned to the service lane. It should be confirmed that there is sufficient parking available within the service lane to accommodate the M Social car parking displaced by the demolition/construction phase. This is necessary to confirm the assumption.
- 10.18 The SATURN modelling shows that in Scenario B PM peak that traffic diverts along Swanson Street to travel between Hobson Street and Lower Albert Street. This increases traffic along Lower Albert Street and increases delay on the Lower Albert Street approach. Is the forecast diversion realistic?

SIDRA Modelling

- 10.19 For Network 1, the model includes an 'intersection' for Sturdee Street give way. Whilst it is acknowledged that this is intended to model the effects of weaving traffic, it is not clear what movements give way and what movements have priority. Furthermore, it is considered that the SIDRA model is not sufficiently detailed to model the effects of weaving traffic in this situation.
- 10.20 In the PM peak for the Quay Street / Lower Hobson Street intersection, the proposed model has a higher cycle time than the existing model. Cycle times should remain unchanged unless there is justification for changing it, particularly as intersection could be linked to other nearby intersections.
- 10.21 In Network 2, it should be confirmed that light construction vehicles have been added to the service lane intersections at Customs Street West and on Quay Street. It is not clear whether this is the case.
- 10.22 An assessment of the operation of the Quay Street service lane access is required for the period when the Customs Street West service lane access is closed due to construction works.

Section 14.3.1 Effects to the operation of key intersections

- 10.23 An improvement to the performance of the Quay Street / Lower Hobson Street / Princes Wharf intersection is reported due to "optimised signal phasing". Other than the removal of the Lower Hobson Street slip lane, which is an exit leg, the changes to signal phasing should be identified.

Section 15 Make Good and Remediation Works

- 10.24 Reinstatement of Fanshawe Street to kerb and berm is recommended with the removal of the ramp from the car park. The form of the reinstatement should be confirmed with the relevant AT SME.
- 10.25 Existing footpaths on Lower Hobson Street and Customs Street West are proposed to be reinstated to "an appropriate standard". For clarity it, should be confirmed what the standard

of reinstatement should be as it will about the completed works within the site. At this stage, it is anticipated that the style and appearance should tie into the existing footpath condition that is present throughout the wider block, i.e. what is evident along Lower Albert Street and Quay Street.

Section 16 Assessment of Temporary Traffic Management Guidelines

- 10.26 Item 2 – Class B hoardings are proposed along the Customs Street West and Lower Hobson Street frontages. The TTM guidelines state the footpaths must be maintained at their existing widths. The width of the footpaths with the hoardings is not stated. To understand the potential effect on pedestrians, particularly along Customs Street West, the width of the footpath with the hoardings should be stated.
- 10.27 Item 9 – Parking removed under the Lower Hobson Street flyover is paid parking. This will have a financial consequence to Auckland Transport.

Construction of Wastewater and Stormwater Pipes / Connections

- 10.28 The Infrastructure Concept Design Report provides details of wastewater and stormwater connections that will be required. These connections will result in construction in the road reserve, including excavations for the installation of pipes. These works will result in potential effects on the operation of the road network including potential impacts on buses and pedestrians. The effects of these works on the transport network have been assessed in the Construction and Demolition Transport Assessment.

Wastewater Connections

- 10.29 Wastewater connections from the site to the existing wastewater network are required. The Infrastructure Concept Design Report discusses five options, and the Assessment of Environmental Effects narrows these options to three options (Option 3 to 5). The application seeks to allow the selection of a preferred option to the detailed design / Engineering Plan approval stage. However, some of the options are likely to have effects on the operation of the transport network to enable the construction of these connections. The transport effects have not been assessed.
- 10.30 It is noted that Option 4 for the pumped connection along Sturdee Street to Nelson Street includes a pump station in land that would be made available following the demolition of the Lower Hobson Street flyover. There are no timeframes as to when the flyover will be removed, therefore, this provides some significant uncertainty as to whether this option would be feasible if the flyover is not removed prior to the completion of the proposed development. Option 4 is not a supported solution by AT, noting that it does raise significant concerns regarding the future upgrades planned for Sturdee Park and the directions included within the CCMP.
- 10.31 Option 5 provides a pipe connection across Lower Albert Street. This includes a potential variant for the connection to be taken across the footbridge that connects the AON/HSBC buildings to Commercial Bay. There appears to be very little clearance between double decker buses and the footbridge. The feasibility of this option would need to be demonstrated as vertical clearance for double deckers will need to be maintained.

- 10.32 Auckland Transport has previously advised that there are challenges in providing a connection across Lower Albert Street due to the utilities in the footpaths in this area. Trenching across Lower Albert Street could have significant impacts on bus operations and passenger movements accessing bus stops.
- 10.33 An assessment of the effects on the operation of the transport network, including for buses during the construction of Options 4 and 5 (as outlined in the Infrastructure Concept Design Report) should be provided. This should include assessing the effects on Sturdee Street and Nelson Street (including the Fanshawe Street / Nelson Street / Sturdee Street intersection) for Option 4, and Lower Albert Street for Option 5. The feasibility of providing a pipe connection across Lower Albert Street should be demonstrated, including providing sufficient vertical clearance for buses.

Stormwater Connections

- 10.34 The Infrastructure Concept Design Report states that new stormwater pipes are required along Lower Hobson Street and Customs Street West along the site frontage. The text states that these would be in the berm but the drawings indicate that these would be in the road. No assessment as to the traffic effects of the installation of these proposed pipes has been provided. Such an assessment is necessary as:
- Lower Hobson Street is proposed to be used for construction vehicle access; if the carriageway needs to be excavated to install the pipe, this would impact on the ability for construction vehicles to access the site. An assessment of how construction vehicles would access the site if Lower Hobson Street is unavailable is required.
 - Installing the pipe on Customs Street West would require the closure of the Customs Street West bus lane and thus impact on buses.
 - If the pipes are to be installed in the footpath (as there is no berm along these sections of road), this would require the closure of the footpaths. An assessment of the effects on pedestrians, including any traffic management that may impact the operation of the adjacent road network, is required.
- 10.35 Further information is required to clarify the location of the proposed stormwater pipes, provide details of the construction methodology and duration of construction, and an assessment of the effects on the operation of the road network, including buses and pedestrians. The implications on the site access for construction vehicles should be assessed if Lower Hobson Street under the flyover is unavailable due to the installation of the stormwater pipes.

11. Wind Report

- 11.1 Whilst we do not have expertise to peer review the supplied wind report, we have turned our minds to consideration around the proposed mitigation measures to reduce any adverse wind effects noting the intent is to rely upon measures within the road reserve.
- 11.2 Part of the mitigation strategy is reliant upon establishing additional specimen tree planting towards the west of M Social, alongside increasing the number of trees contained within an existing tree pit located at the intersection of Lower Hobson Street / Quay Street. This is an issue that has been discussed at a high-level with AT's specialists, who consider that there may

be an opportunity to increase the density of planting in the applicant's identified location. However, this is subject to Engineering Plan Approval, which will require further consideration surrounding (but not limited to) the size of any tree(s) at the time of planting; proximity to underlying services; and future planned upgrades required as part of the surrounding transport network.

- 11.3 Additionally, it is acknowledged that part of the intended mitigation strategy is reliant upon the establishment of a canopy extending into the road reserve along the western frontage of the subject site. For any structure(s) encroaching into the road reserve, an Encroachment License is required for such works. In terms of the reliance of the canopies for the purposes of a permanent assessment for mitigating adverse effects, we would recommend some caution noting that Encroachment Licenses are limited in duration, up to a maximum of 20 years, and can be terminated on a notice period of one to two months. Encroachments are required to be designed to be removable, which must be demonstrated at the time of applying for a future Encroachment License application.
- 11.4 If the wind mitigation strategies are required to be permanent to provide certainty that suitable mitigation will be in place to maintain safe wind speeds, consideration must be given to whether the extent of canopy depth needs to be increased further within the boundaries of the subject site where the applicant has direct control or through the implementation of any other measure(s) that is not directly reliant upon what is positioned within the road reserve.

12. Conditions of Consent

- 12.1 The following table provides comments on the conditions of consent, particularly as they relate to the comments above. The comments are not intended to be provide comprehensive feedback on conditions but are provided to assist the applicant in refining the conditions.
- 12.2 In general, the management conditions should clearly set out the objectives of the plans, required outcomes and specific measures that will be implemented.
- 12.3 A condition is required on the operation of the proposed access under the Lower Hobson Street flyover to restrict the use of this access to heavy vehicles only and not permit trades vans or vehicles to use this access.

Condition	Comment
4 – Community Liaison Group	Recommend that representation by Auckland Transport be included in this condition, noting that the management of related construction effects will be an iterative process particularly acknowledging the fact that many of the details around the contractor's methodology have not yet been finalised.
27 - 28 – Construction Traffic Management Plan	There are quite a few concerns regarding the lack of specific details around the management measures, which would likely necessitate additional principles and/or other measures being included in the

	preparation of the final CTMP for certification.
53-55 – Managed Access Service Arrangement Plan (M Social)	The MASAP condition does not provide sufficient detail as to the contents of the plan or provide confidence that the measures identified in the application material to manage the M Social access will be delivered.
79 – Flooding	Have not had an ability to refer the updated assessment through to AT's SMEs. We reserve comment on this aspect.
107 – Wind	As noted above, there are concerns relating to the reliance upon measures within the road reserve.
116 Footpath Reinstatement	The footpath reinstatement should detail the quality / type of the materials to be used for the footpath taking into consideration the interface with the proposed development.
122 Servicing and Loading Management Plan (SLMP)	The condition needs to consider what occurs if vehicles arrive outside of the 'core' hours, particularly as a Dock Manager only needs to be available during the core hours.
124-127 Hotel PUDO Management Plan (HPUDOMP)	The condition does not provide sufficient detail on what contents the Management Plan should include, including outcomes sought from the management plan.
	A review condition of the Hotel management Plan is required. This should be able to be triggered at the request of Council to respond to complaints received from the public or operational issues identified by Auckland Transport or Auckland Council that affect the safe and efficient operation of the adjacent road reserve.
130, 131 – Visibility intervisibility Convex Mirror	The condition should refer to the service lane as it is not clear where the convex mirror is required. This is needed to assist users of the conditions.
Advice Note 26 – Works that require a Resolution	The advice note should refer to this specific site.