

FILE NOTE

Project	9234 Downtown Car Park Redevelopment
Date	20 May 2026
Subject	Section 53 Comments - Response
Prepared	<i>on behalf of</i> Warren and Mahoney Architects New Zealand Ltd
Distribution	Pamela Santos (Barker & Associates)

The following memo responds to matters raised relating to Universal Design & Landscape contained within Auckland Council s53 responses in relation to FTAA-2512-1158.

Universal Design Matters:

07. Technical Specialist Memo - Universal Design

The Universal Design commentary provided by Auckland Council is extensive and we have not endeavoured to undertake further detailed response beyond the responses to RFI's provided previously (FN0001 – Section 67 Request for Information).

Key areas of ongoing commentary appear to be:

- **Detailed clearances at entrance/egress points along the Lower Hobson Street elevation.** As per our previous RFI response we remain open to further dialogue and design refinement to achieve an acceptable outcome and to resolve any remaining concerns. The proposed condition seems to achieve this intent and is acceptable.
- **Provision & location of the accessible lift.** There remains concern regarding the location of the accessible lift. Our view remains unchanged, which is that the proposed lift location is proximate to, and visible from the stair, and that is optimally located in relationship to the range of directions of travel through the site. This location will be supported by high quality wayfinding signage and lighting to ensure legibility.
- **CPTED - lighting and pedestrian safety issues.** We note that Auckland Council's Urban Design assessment highlights that 'the proposal continues to achieve good CPTED outcomes'. We believe many of the remaining detailed concerns raised in the Universal Design memo are addressed by the requirement for a Detailed Lighting Plan and an Active Surveillance Plan as a consent condition.
- **Provision of Accessible Residential apartments.** We have commented previously on the provision of a range of apartment sizes and types, and on the ability for selected apartment types to be modified to conform with accessibility requirements (if required). The proposed Conditions of Consent are in excess of the New Zealand Building Code requirements and the Council's proposed inclusion as a Consent Condition is inappropriate.

Our response to the proposed Consent Conditions are as follows:

Universal Design		
Item	Proposed Condition of Consent (red represents Council's proposed addition/amendment)	Design Team Response
46 Architectural Design Plans	f. Finalised design of the ground floor elevation wall position and door locations relative to the stairs and planters along Lower Hobson Street to facilitate safe emergency egress during evacuation and reduce	We consider this to be acceptable.

	movement clash (able bodied moving straight down stairs clashing with mobility impaired moving across their movements)	
47 Landscaping	a. detailed landscape plans for streetscape and the urban room and specifications;	We consider this to be acceptable.
	b. location of planter boxes adjoining circulation paths, with clear widths marked between walls, stairs, external doors and planter beds to show adequate clearances. This is to ensure appropriate egress widths and movement, particularly during an emergency evacuation on Lower Hobson Street;	We consider this to be acceptable, although a duplication of 46.f)
	c. planting schedule, detailing the specific planting species, the number of plants provided, locations, distances in between trees at street level type (ever green or deciduous), the heights/pint bag sizes;	We consider this to be acceptable.
48. Signage and Wayfinding Design	b. All exterior directional, wayfinding, including location of public lifts, amenities, locker rooms, accessible toilets and rest rooms, and traffic and parking signs associated with the management of vehicle access to and from the Site that is not on land controlled by Auckland Transport.	We consider this to be acceptable.
	d. All signage must be universal in nature – intuitive, legible and accessible for all carrying fonts, heights, colour contrast approved by low blind vision, include raised tactile lettering and braille for floor mounted signs, and interactive NZSL panels at information counters/ plinths at critical junctions.	Public signage will be designed in accordance with public realm best practice. The detailed description here feels onerous for a Consent Condition.
49. Lighting Plan	c. include proposed locations, lux levels and types of lighting (i.e. manufacturer's specifications once a lighting style has been determined) and any light support structures required to control timing, level of lighting, or to minimise light spill, glare, and loss of night-time viewing; including emergency lighting, sensor lights, areas of glare free luminaires and, strip lighting along stairs and in front of lifts.	We consider this to be acceptable.
	h. including night-time illumination proposed for the stairway along Customs Street West; and	We consider this to be acceptable.
NEW - Publicly Accessible Lift	A strategy to maintain Universal Lift Access in the event of breakdown of the publicly accessible lift, 24/7. This might include temporary 24/7 access to the office lobby lifts during a breakdown, or the provision of a second publicly accessible lift.	This requirement to maintain access 24/7 is unreasonable and this condition is not acceptable. Maintenance can be scheduled to align with timeframes in which minimal usage occurs.
NEW Universal Design Residential Dwellings	Prior to the lodgement of Architectural Building Consent, a finalised Apartment Schedule and apartments drawings must be submitted to the Council for written certification. The information must include the following:	All of these requirements are in excess of the New Zealand Building Code requirements and should not be included as a Consent Condition as outlined above.

	a) An analysis demonstrating efforts to consider Universal design parameters in apartments closest to vertical circulation hubs and an updated Apartment Schedule identifying at least 5% of the residential dwellings (or a minimum of five) designed as accessible to suit design and access requirements. b) This should provide for a range of dwelling sizes; c) Updated floor plans for each of the Apartments updated to meet the above parameters' d) A statement prepared by a Universal Design specialist or accessibility consultant confirming all considerations for Universal Design undertaken in general and how design parameters' for the accessible apartments have been met.	
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Landscape Design Matters:

- 6. Technical Specialist Memo – Urban Design
- 14. Technical Specialist Memo – Parks Planning
- 17. Technical Specialist Memo – Arboriculture

The following limited commentary relates to the sufficiency of the proposed 15-20m³ tree pit volumes contained within our previous response (FN0001 – Section 67 Request for Information). We are of the view that our previously submitted response addressed this matter sufficiently, including a written description and additional drawings; however limited further commentary is provided below.

This response does not address the wind and land ownership specific queries raised – these are addressed by others.

Tree Pit Volume		
Item	Query / Information Requirement from Council	Design Team Response
Memo - Arboriculture	7.4. The response has confirmed that only a desktop review was undertaken regarding the planting of the four Pohutukawa trees. The response has confirmed that the potential tree pit volume will be between 15m ³ and 20m ³ .	Our previous FN0001 response also highlighted that should in-situ below ground services be more significant than shown on available council data sources, an above ground planter could be implemented to retain the proposed tree pit volumes. This may include a raised seating edge with soil volume mounded behind and similar to the adjacent seating along quay street FN0001 also confirmed that the plan arrangements and details have been developed in conjunction with the project arborist to allow some flexibility in accommodating the proposed trees around existing services.
	7.5. The total volume of soil or growing medium that a tree has, will ultimately determine a trees final size and life span. If the volume is restricted, this will also restrict a trees potential size and the benefits it provides. Determining if the volume being allocated is sufficient is dependent on what the purpose of the planting is and what is trying to be achieved.	Agreed in principle. The trees are not expected to achieve unrestricted mature dimensions typical of coastal pōhutukawa specimens - they are being designed as managed urban street trees within a constrained road corridor.

	7.6. Based upon the current volume of the planting pits, the trees are unlikely to attain a natural full mature canopy spread and size, compared to a tree with an unrestricted growing environment.	While a 15–20m³ soil volume may not support unrestricted mature pōhutukawa canopy development, the proposal does not rely upon that outcome. We understand that our proposed tree pit volume exceeds recent Auckland urban benchmarks in Quay Street, Madden Street and Fort street.										
Memo – Parks Final	5.1.2 As confirmed by Councils Senior Urban Forest Specialist, Bernardo Santos, the proposed 15–20m³ tree pit does not align with the Auckland CoP (Chapter 7) for a large canopy species such as pohutukawa, and is unlikely to support full maturity or long-term performance. In a constrained, wind-exposed environment with ongoing pruning pressures, this increases the risk of decline, higher maintenance, and reduced functional value.	As confirmed in FN0001 – the proposed tree pits are designed in accordance with the <i>'Auckland Code of Practice for Land Development and Subdivision, chapter 7: Landscape, table 4: minimum soil volume requirements for trees within built structures'</i> (Page 41) which identifies 'large' trees as requiring minimum soil volumes of >15m³. Refer table below: CHAPTER 7: LANDSCAPE 41 Table 4: Minimum soil volumes for trees in built structures <table><tr><th>Trunk diameter at maturity</th><th>Small (<100 mm)</th><th>Medium (100 - 150 mm)</th><th>Medium/Large (150 - 250 mm)</th><th>Large (>250 mm)</th></tr><tr><td>Minimum soil volume</td><td>>8 m³</td><td>>10 m³</td><td>>15 m³</td><td>>15 m³</td></tr></table>	Trunk diameter at maturity	Small (<100 mm)	Medium (100 - 150 mm)	Medium/Large (150 - 250 mm)	Large (>250 mm)	Minimum soil volume	>8 m³	>10 m³	>15 m³	>15 m³
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Minimum soil volume	>8 m³	>10 m³	>15 m³	>15 m³								
	5.1.3 Given the reduced soil volume, the proposal does not adequately acknowledge the associated limitations, including reduced longevity and the need for a defined replacement strategy. The proposed species and form (e.g. multi-stem vs single-stem) is not provided, and the constructability of tree pits in proximity to underground services, including input from relevant utility providers where applicable, have also not been appropriately addressed.	Drawing L03 illustrates the existing services and site constraints that are currently informing the design approach. There are a number of below ground utilities, including power, water, and stormwater infrastructure, which require careful coordination. The sections also illustrate the proposed strategy for working around the existing services, ensuring root intrusion and disturbance to underground infrastructure is avoided. Preliminary offsets have been indicated, and the required clearances will continue to be coordinated with the relevant service authorities throughout the developed design phase.										