

To: Precinct Properties NZ Ltd c/o

Date: Wednesday, May 20, 2026

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Job No: 5024

Subject: Downtown Carpark Site Development (Fast-track Application) – Response to EPA Fast-track Process s53 comments (landscape).

1 INTRODUCTION

1.1 This memorandum has been prepared following review of the s53 comments received in relation to the FTA application process for the proposed Downtown Carpark Site Development by Precinct Properties New Zealand Ltd, at 2 Lower Hobson Street in central Auckland.

1.2 This response is provided in relation to landscape assessment matters and focuses on those raised by Auckland Council's Specialist Landscape Architect, Mr Stephen Quin. In the preparation of this memorandum I have reviewed the following documents:

Specialist comments

- The *Technical Specialist Memo – Landscape*, prepared by Mr Stephen Quin (Principal Landscape Architect) for Auckland Council (dated 23 April 2026),
- The *Technical Specialist Memo – Urban Design*, prepared by Mr Mustafa Demiralp (Principal Urban Designer) for Auckland Council (dated 29 April 2026), and
- The *Memorandum of Planning Matters for Auckland Council*, prepared by Ms Sarah Wilson (Senior Planner) for Auckland Council (dated 7 May 2026).

1.3 No landscape related issues have been raised by other parties on the application.

2 RESPONSE TO REVIEW COMMENTS

2.1 The technical specialist review from Auckland Council, in relation to landscape matters, provides comments around how comprehensive mixed-use development is appropriate on the site and that change is anticipated within the city centre. However, overall the review is unsupportive of the Project and a number of issues are raised. These are addressed below based on the following key themes.

- Transition in building height,

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- Visual permeability,
- Waterfront amenity,
- Natural character, and
- Visual amenity assessment process.

2.2 My landscape assessment report provides an effects-based assessment of the Project on this site in the round in the context of the city centre whilst providing evaluation against the relevant planning framework. The Project is for two large buildings set upon a podium within the north-western part of Auckland's city centre, where the tallest building are provided for and anticipated in the Auckland Unitary Plan.

Transition in building height

2.3 Many of the concerns raised by Mr Quin relate to the Harbour Edge Height Control Plane (**HEHCP**) and the relevant planning provisions¹. The *transition in building height* is one component for evaluation under the purpose of the HEHCP.

2.4 Within his assessment Mr Quin makes a number of statements around the proposed transition, particularly in relation to the proposed height and form of the respective buildings. These include comments related to:

- the “*significant infringements to the standard will cause the city form to not transition down to the Viaduct Harbour Precinct or to the harbour edge...*”²,
- the “*existing transition will no longer be legible*”, “*would become obsolete*” and the proposed transition “*would become the dominant plane*”,³ and
- “*Rather than transitioning down, I consider that the proposal will create an abrupt and dramatic height drop between the proposed towers and the neighbouring Viaduct Harbour Precinct*”⁴.

2.5 For the reasons outlined within my report as part of the assessment of (i) the *Potential effects on the broader cityscape (scale, appearance and context of the towers on the skyline)* (from page 36), (ii) assessment from respective viewpoints within the city centre (from page 42) and in the wider city context (from page 55), and (iii) specific assessment in relation to the HEHCP (from page 67), I disagree with these statements. In my opinion, the proposed design will provide a legible and obvious transition in building height between buildings T1 and T2 to the waterfront, setback behind the M-Social building and HSBC tower which front Quay Street. It also provides a transition to the

¹ Refer H8.6.5, H8.8.1(8A) and H8.8.2(8A) of the AUP.

² From paragraph 12 of Mr Quin's landscape assessment.

³ From paragraphs 20 and 21.

⁴ From paragraphs 33, with similar comments provided within paragraph 34(c).

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Viaduct Harbour Precinct to the west, setback beyond the existing buildings in the Viaduct and the separation distance of Lower Hobson Street.

- 2.6 The proposed height transition will complement both the existing and planned built form and character as anticipated by the AUP(OP). As outlined within paragraph 106(r) of my assessment and through the visual amenity assessment (from page 42), although there is a steeper transition between the two respective towers than anticipated by the AUP and HEHCP, it is not abrupt or inappropriate in the context of the city. This is achieved through the stepping and chamfered form of the buildings. There is not a radical departure from the planned built form in the city and the transition is provided through visually interesting buildings which are not a ‘monolithic presence’⁵. The Project will integrate with and positively contribute to Auckland’s skyline overall, located within the cluster of taller buildings within the western reaches of the city centre.
- 2.7 Within paragraph 30 of Mr Quin’s memo he also states that my assessment has not given *“sufficient acknowledgement of **the existing transition** of building heights down to the waterfront or to the effects that the proposal will create on this transition”* (emphasis added). Within paragraphs 106(p) – (u) of my report, and through the viewpoint analysis, the existing transition is described and assessed.
- 2.8 I remain of the opinion that the height, form and scale of the proposal will be complementary to the planned and existing built form within the city centre and a legible and obvious transition is provided to both the harbour edge and Viaduct Harbour Precinct which responds to the site’s location in the city centre, where the tallest buildings are anticipated by the AUP. The design retains the purpose of the standard (including with the existing ‘recession plane’) and is appropriate in this context.
- 2.9 This matter regarding transition in building height (in relation to the HEHCP) is also addressed within the urban design memorandum prepared by McIndoe Urban.

Visual permeability

- 2.10 Another theme of Mr Quin’s review relates to visual permeability, which is also a component of the purpose of the HEHCP. Mr Quin states⁶ the Project will contribute to a *“wall effect of towers along the front row of the waterfront as approaching the city centre from the north”* and that there is reduced ‘airspace’ and ‘openness’ around the buildings which will reduce the visual permeability between the harbour and the city.

⁵ Per paragraph 41 of Mr Quin’s landscape assessment. I provide commentary in relation to how the design avoids having a monolithic appearance (refer paragraphs 106(h) and 159) and how it presents visually interesting buildings and façade treatment throughout my assessment report.

⁶ From paragraph 34a)ii of Mr Quin’s landscape assessment.

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- 2.11 Within my report I have provided assessment of visual permeability in relation to a number of viewpoint locations⁷ and from views from the Sky Tower⁸. This is also discussed within paragraph 226(d) of my assessment report. In my opinion, the Project will retain visual connection and permeability between the harbour and the city centre and a 'wall effect' is avoided.
- 2.12 In relation to Mr Quin's comments regarding the upper levels of the building reducing the airspace and not providing 'breathing space'⁹, I note that the relevant AUP criterion refers to airspace around towers¹⁰. This is achieved by the setback of the proposed towers from the site boundaries, from other towers in the city, and their slender east-west form and dimension.

Waterfront Amenity

- 2.13 Mr Quin also provides comments related to effects on waterfront amenity¹¹, particularly related to Quay Street and the public open spaces along that waterfront edge (such as Te Wānanga) and also within the Viaduct Harbour.
- 2.14 I have provided assessment of the potential effects in relation to waterfront amenity, including along Quay Street within paragraphs 91 – 95 (*Relationship to Quay Street*) and paragraphs 230, 233 and 234 (*Amenity effects on the streetscape and adjacent public open spaces along the waterfront*) within my landscape assessment report.
- 2.15 The Project has been appropriately designed to minimise any potential dominance effects and will not result in a significant loss of amenity to the streetscapes or public open spaces along the waterfront. Te Waitematā remains an important natural asset for Auckland's identity and the design is appropriate in the context of the harbour and city centre.

Natural Character

- 2.16 Within paragraph 42 of his memo Mr Quin considers that the proposal does not align with Policy 6.1.9 of the New Zealand Coastal Policy Statement (NZCPS), with particular regard to the "*set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment*".
- 2.17 The site is located on reclaimed land proximate to the Waitematā Harbour coastal edge in the urban centre of Auckland city. It is a highly modified urban environment where development is enabled and anticipated by the AUP. As outlined within paragraphs 236

⁷ Including assessment for viewpoints 1, 4, 8 and 13 and the associated visual simulations within Appendix B.

⁸ Refer paragraphs 133 – 139 and Image S within my assessment report.

⁹ Refer paragraphs 22, 23, 26, 39 and 56 of Mr Quin's landscape assessment.

¹⁰ Refer H8.8.2.(8A)(a)(ii) (bullet 3) of the AUP.

¹¹ Refer paragraphs 36 – 42 of Mr Quin's landscape assessment.

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– 239 of my assessment report any effects on natural character are assessed to be very low, at most, and the proposal will not result in a significant loss of amenity to the adjacent public areas on the waterfront.

Visual amenity assessment process

- 2.18 Within paragraphs 5 – 8 of his review memo Mr Quin outlines and acknowledges the methodology used in the preparation of the visual simulations follows best practice guidelines, and their use as a tool to assist with analysis of visual effects. He also states that there are “*limitations of relying on visual simulations to undertake visual assessment*”. I agree with Mr Quin as simulations are one tool to assist with representation of proposals.
- 2.19 In the preparation of my assessment I used the seventeen visual simulations prepared to assist with my evaluation, in conjunction with walking around the city centre and travelling to different parts of the wider city context. This allowed me to understand the site and its existing context, the existing buildings (and their scale) and streetscape environment, and to view and experience the city at street level and within the wider context. I also reviewed the architecture and landscape drawing sets and the rendered images within the Visual Study¹² document as part of my assessment to assist with my understanding of the design of the Project, its scale, and its position in the localised and wider city context. This, in conjunction with review of the relevant planning provisions, allowed me to gain an overall understanding of the Project in that context beyond the sole use of visual simulations.

3 CONCLUSION

- 3.1 I remain of the opinion that the proposal is appropriate for this site within Auckland’s city centre. It will positively transform and rejuvenate a blighted part of downtown Auckland, proximate to the waterfront and harbour edge. It will positively contribute to streetscape, and street level circulation and activity, to the cityscape by introducing a pair of towers with a family likeness to the skyline, and is an appropriate development in terms of the site’s urban landscape context. In my opinion, although the tower heights result in an infringement the proposal will achieve the purpose of the HEHCP.

¹² Refer to Appendix D – Visual Study to the Landscape Assessment report, prepared by Warren and Mahoney Ltd.