

Your Comment on the Downtown Carpark Redevelopment Project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Viaduct Harbour Holdings Limited (“VHHL”) C/ Douglas Allan, Counsel (details below)		
First name	Douglas		
Last name	Allan		
Postal address	c/ Ellis Gould, Solicitors, [REDACTED]		
Mobile phone	[REDACTED]		
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Please provide your comments below, include additional pages as needed.

VHHL owns freehold interest in land in the Viaduct Harbour and Wynyard Precincts, adjacent to the Downtown Carpark site subject to the Downtown Carpark Redevelopment Project (“**Application**”).

VHHL generally supports the Project. VHHL’s primary concerns with regard to the Application relate to the potential for it to generate significant adverse effects on the transport and transportation networks around the Downtown Carpark site and adjacent to and within the Viaduct Harbour and Wynyard Precincts during the demolition and construction works phases.

In that regard, VHHL has retained Leo Hills of Commute, Traffic Engineers to advise on the Project’s implications. Mr Hills’ report, dated 6 May 2026 (“**the Report**”), is submitted to the expert panel under cover of this form. The Report concludes that:

- The most significant concerns arise in relation to the operation of Lower Hobson Street and the removal of the right turn into Customs Street West (into Viaduct) from Lower Hobson

during the demolition and construction phases, and ensuring all heavy construction vehicles should avoid streets in the Viaduct Harbour / Wynyard Harbour.

- Demolition and construction traffic effects on VHHL can be addressed provided the conditions of consent require imposition of the measures proposed by the applicant. That includes a condition of consent which specifies the CTMP should explicitly state all heavy construction vehicles should avoid streets in the Viaduct Harbour / Wynyard Harbour. This would be in accordance with FLOW reporting.

VHHL accordingly asks that the conditions of any consent require compliance with the traffic and access arrangements specified in the most recent form of the Application and in particular specify that all heavy construction vehicles should avoid streets in the Viaduct Harbour / Wynyard Harbour Precincts.

Thank you for your comments

Mr K Bunting
Chief Executive
Tramco

6 May 2026

Copy via email: [REDACTED]

Dear Kym

PEER REVIEW – DOWNTOWN CARPARK REDEVELOPMENT (VHHL)

Further to your instruction, we have undertaken a peer review of the proposed redevelopment of the Downtown Carpark building in Auckland CBD, in relating to Viaduct Harbour Holdings Limited's (VHHL) landholdings in the area.

This report summarises our understanding of the traffic management methodologies proposed in conjunction with the demolition and construction phases of the Downtown Carpark Redevelopment and any matters that we consider should be addressed in conditions.

In short, the most significant concerns arise in relation to the operation of the Lower Hobson Street and the removal of the right turn into Customs Street West (into Viaduct) from Lower Hobson and ensuring all heavy construction vehicles should avoid streets in the Viaduct Harbour / Wynyard Harbour. In our opinion, demolition and construction traffic effects on VHHL can be addressed provided the conditions of consent require imposition of the measures proposed by the applicant.

1 SCOPE OF REVIEW

I have reviewed the following documents that have accompanied the Downtown Carpark Fast Track application (**application**):

- *"Appendix 13_Operational Integrated Transport Assessment;*
- *"Appendix 14_Draft Construction Management Plan;*
- *"Appendix 20_Draft Operational Waste Management Plan;*
- *"Appendix 26_Draft Construction Traffic Management Plan.*
- *"Appendix 40_Demolition+Construction Transport Assessment; and*
- *9 April 2026 FLOW response to questions raised in our initial review (13 March 2026).*

Our review concentrates on the documents produced by the applicant's traffic engineer (FLOW) and specifically the Operational Integrated Transport Assessment, the Draft Construction Traffic Management Plan and the Demolition and Construction Transport Assessment.

From a review of the documents the key matter relates to the operation of the road network surrounding the VHHL landholdings during construction.

Figure 1 shows the VHHL landholdings in relation to the subject site.

Figure 1: VHHL landholdings in relation to applicants site



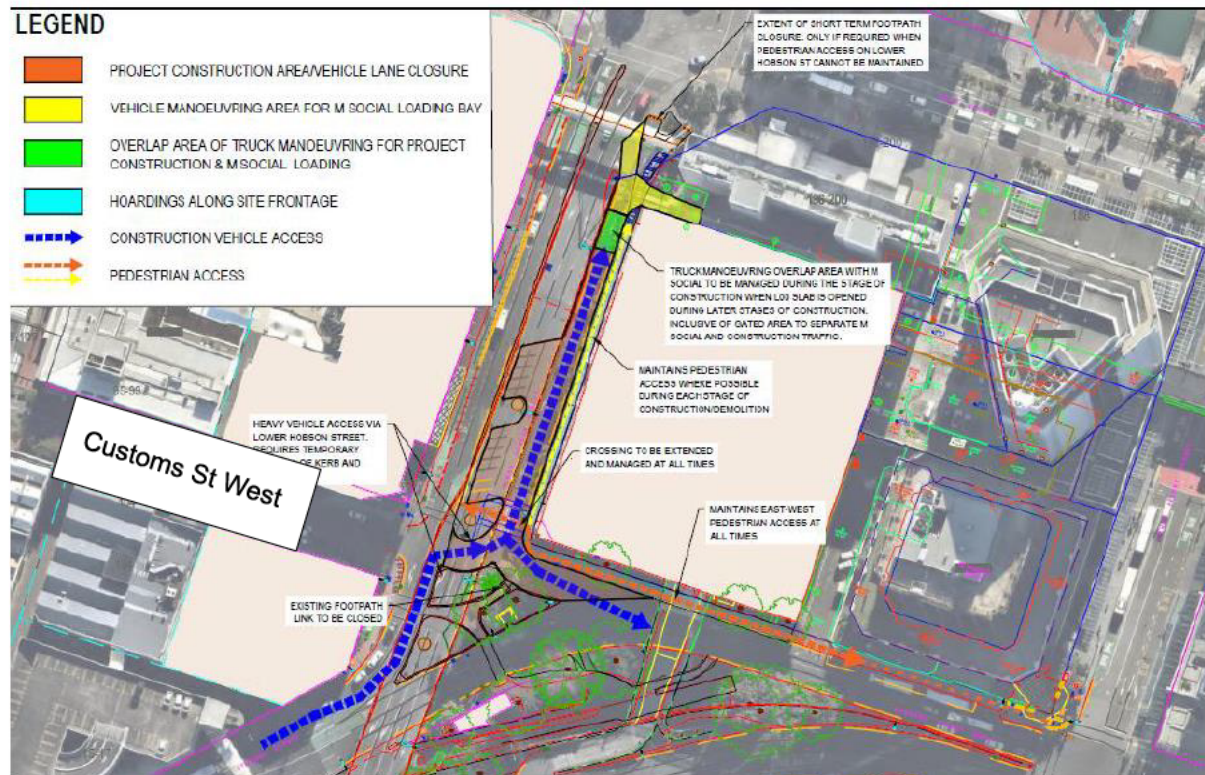
2 DEMOLITION CONSTRUCTION EFFECTS

2.1 GENERAL

The updated Construction Traffic Management Plan (CTMP) is significantly different to previous versions we have reviewed.

From our review, due to Auckland Transport requirements, no large construction trucks will be allowed to use Quay Street. As result, for the entire demolition / construction period, trucks will enter the construction site using Lower Hobson Street with the key change being that the south-bound lanes on the eastern side of Lower Hobson Street are proposed to be closed to general traffic and “reversed” in direction (currently one-way southbound and proposed to be one-way northbound). This is shown in the blue arrow in Figure 2 below (taken from the CTMP)

Figure 2: Construction access



Trucks will enter the construction site in various locations on the west side of the Downtown building. They will then exit out into Custom Street East and travel east through to Beach Road and the motorway network.

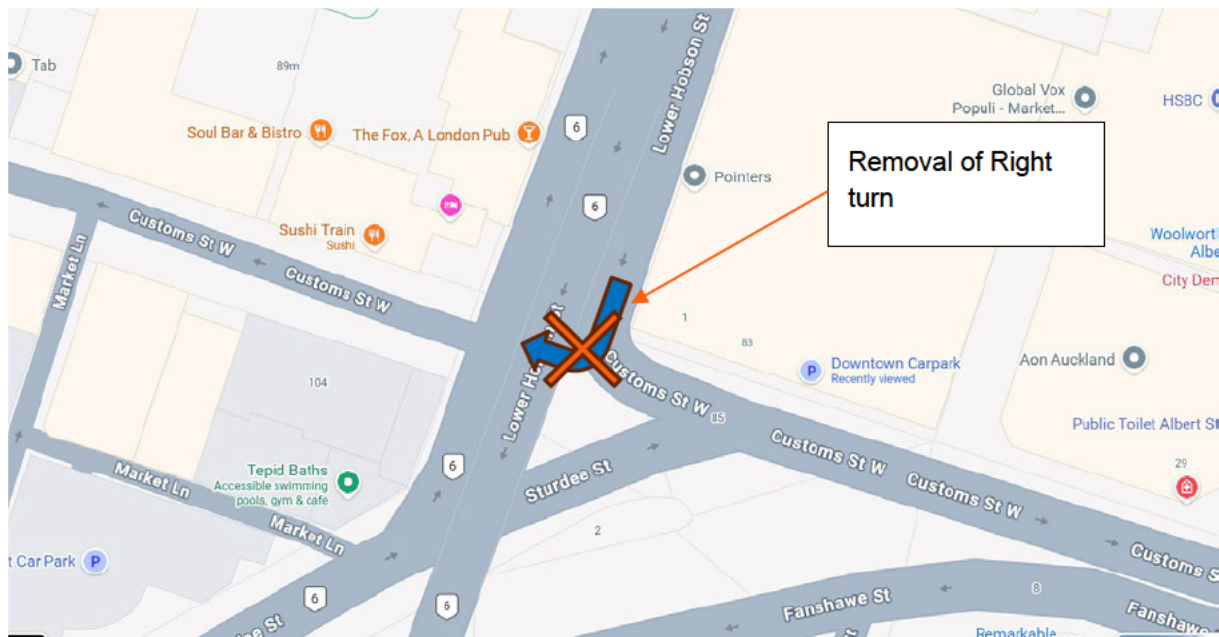
There is also proposed to be a full closure of Lower Hobson Street for the removal of the pedestrian overbridge which is likely to occur at early staged of demolition. The documentation notes that it is anticipated that the bridge can be removed within 48 hours.

From a review of the above we consider:

- The key change relating to the VHHL land will be with Lower Hobson Street “reversed” in direction, vehicles will no longer be able to enter Customs Street West into the Viaduct via the right turn from the north (Lower Hobson Street). See Figure 3 below
- As such the only entry into Customs Street West at this intersection will be the left turn;
- As such those vehicles currently turning right into Customs Street West will need to divert to other routes;
- We have reviewed the FLOW reporting regarding the effect of this temporary restriction / diversion:
 - FLOW have assessed the potential effects of this diversion route using SATURN model to estimate the delays of a vehicle travelling from the Quay Street / Lower Hobson Street intersection to the Customs Street West / Lower Hobson Street intersection (ie worst case). This movement is predicted to take around 100 seconds more as a result of the diversion route. However, this is on the assumption that drivers will select the same route. As this lane closure will apply throughout demolition and construction, drivers will likely become accustomed to this closure and select alternative routes in advance

- The SATURN modelling indicates 193 vehicles per hour (vph) and 98 vph will be diverted from this right turn in the AM and PM peaks respectively; and
- The delay plots show very little increase in delay on the network (less than 5 seconds) to any movement into the viaduct at other intersections as vehicles disperse to other intersections / routes.

Figure 3: Removal of Right turn in



2.2 TRUCK ROUTES

We consider that the road network surrounding the VHHL properties is generally not appropriate for large numbers of heavy vehicles associated with construction.

In this regard we note that the FLOW Draft Construction Traffic Management Plan (section 11 in particular) states that one of the key principles of the CTMP is “*Avoid using Quay Street and the Viaduct Streets as heavy construction vehicle routes*”. This is reinforced in the proposed heavy vehicle routes which have the trucks entering the site via Fanshawe Street.

We agree with FLOW and the routes they have used (and not used). As such we consider the condition of consent which specifies a CTMP should explicitly state all heavy construction vehicles should avoid streets in the Viaduct Harbour / Wynyard Harbour.

3 POST CONSTRUCTION

We have generally reviewed the traffic modelling in the Traffic Reports and consider in general it is based on sound assumptions and shows little to no changes to the roading network including around VHHL’s landholdings. This is not surprising given that, while the development is predicted to increase traffic volumes out of the service lane access onto Quay Street, this is be offset by a reduction in through traffic on Quay Street, due to the reduction of trips travelling to and from the Downtown Carpark.

4 CONCLUSION

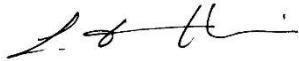
Overall, from our review of the Downtown carpark redevelopment in relation to Viaduct Harbour Holdings Limited's landholdings:

- The proposal (once construction is completed) will result in minimal changes in network operation;
- During construction the key traffic engineering issue relates to the operation of the Lower Hobson Street and the removal of the right turn into Customs Street West (into Viaduct) from Lower Hobson St;
- The FLOW modelling shows 193 vph and 98 vph will be diverted from this right turn in the AM and PM peaks. The resultant additional delay entering the viaduct as a result of this restriction has been shown to be minimal.
- We consider the condition of consent which specifies a CTMP should explicitly state all heavy construction vehicles should avoid streets in the Viaduct Harbour / Wynyard Harbour. This would be in accordance with FLOW reporting.

I trust this is sufficient for your requirements. Should you have any queries, please do not hesitate to contact me.

Yours sincerely

Commute Transportation Consultants



Leo Hills

Director

