

The Expert Panel Secretariat, Environmental Protection Authority (EPA)

Application Reference: 188 Beaumont Street (FTAA-2604-1205)

Date: 1 August 2026

Submitter Details

Name:

Robert James Pryor and Robyn Joy Pryor, [REDACTED]
[REDACTED]

Property Address:

[REDACTED]

Contact: [REDACTED]

1. Introduction

As owners within the 30 Madden Apartment complex, we welcome the Expert Panel's directive in Minute 2, Section 25, noting that "the impact of the Project on existing residents is a matter relevant to its decision making task" to prevent the evaluation from being confined solely to the commercial perspectives of the Applicant and Auckland Council.

As residents of 30 Madden, we are very supportive of ongoing progressive development in the Wynyard Quarter and development that has occurred to date. Our objection is not to growth or density, but rather to an excessive exceedance in height of the proposed 81.35 metre¹ high tower that overrides established planning frameworks and threatens the Precinct's urban design and architectural integrity.

2. Background and Experience

My full name is Robert James Pryor. I am a registered landscape architect and Director of LA4 Landscape Architects (LA4).

I hold a Bachelor of Science in psychology from Otago University and a post-graduate Diploma of Landscape Architecture from Lincoln University. I am a registered member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects (**NZILA**). I am also a member of the Resource Management Law Association (**RMLA**) and the Urban Design Forum (**UDF**).

I have over 40 years' experience undertaking landscape assessments for clients in both the public and private sectors on a wide range of major projects within a range of landscape settings. I specialise in the preparation of landscape and visual effects assessments.

In my professional capacity I have supported a number of over height developments throughout Auckland, but emphasise, in accordance with the Te Tangi a te Manu Aotearoa Landscape Assessment Guidelines 2022 that "**context is everything**".²

In preparing this submission we have referenced the application materials and in particular the Urban Design and Landscape Assessment (**UDLA**), prepared by Boffa Miskell Limited, dated April 2026, and the architectural plans prepared by Warren and Mahoney, dated 17/03/2026.

¹ Warren and Mahoney Architects, Drawing RC20.000

² Te Tangi a te Manu, Aotearoa Landscape Assessment Guidelines {5.32}

3. Submission in Opposition to the 188 Beaumont Street Proposal

This submission opposes the proposed residential and mixed use development at 188 Beaumont Street, Wynyard Precinct, on the following grounds:

Excessive Height and Visual Dominance

- The proposed tower significantly exceeds the previously permitted height for the site (previously 52m, now 62m), with the building reaching up to 81.35m above street level. This height is totally out of scale with the surrounding built environment and undermines the original intent of the Wynyard Precinct's urban design framework, which sought to maintain a balanced and legible skyline.
- The tower's prominence will visually dominate the western waterfront, detracting from the character of the area and diminishing the intended landmark quality of other marker buildings in the Precinct. The tower will challenge the primacy of the CBD high-rise core.
- Visual simulations from multiple public viewpoints illustrate the tower as a disproportionately large and intrusive element, especially when viewed from key public spaces.

Please refer to **Appendix 1** illustrating the 62m height limit superimposed on the architectural elevations, renders and visual simulations.

In regard to the visual simulations I would make the following comments. In making these comments I have regard to the TTatM guidelines:

A landscape effect is a consequence of change in a landscape's physical attributes on that landscape's values. Change is not an effect – landscapes change constantly. It is the implications of change for a landscape's values that is the effect³. Visibility and change are not effects in and of themselves⁴.

I also concur that the objective of an LVA is not to assess change or visibility but the nature and magnitude of effect of change on the existing landscape values. With all assessments the objective is not to determine the proposal's extent of visibility, it is to determine how the proposal will impact on existing landscape values, including landscape character and visual amenity. Visibility of itself is not an adverse effect⁵.

VS1C – Sulphur Point Beach

The LVA states that *"in the visual simulation the Project is visible to the west of the maunga which remains clearly in view. In views from within the protected viewshafts the maunga will retain its established presence."* In my opinion the additional height will have an adverse effect on the visual integrity of the volcanic maunga and be overly dominant. Retaining the height to the permitted 62m will retain the intended 'marker building' function.

The visual simulation also illustrates that the building challenges the primacy of the Central City core, presenting as a competing element, in isolation from the CBD.

VS2C – Shelley Beach Road Overbridge

The LVA states that *"The building's closer proximity to the viewer, in the foreground to the city, increases its apparent scale although not to a point that it is out of context with its existing city backdrop."* In my view the visual simulation clearly illustrates that the building is completely out of context with the city backdrop, vying for attention. The city backdrop's varied grain of development

³ Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines, [p. 135]

⁴ Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines, [p. 245]

⁵ Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines, [p. 146]

reduces in height towards the waterfront with the taller central core. Again, this view illustrates that the building challenges the primacy of the Central City core, presenting as a competing and out of context element in isolation from the CBD.

VS3C – St Marys Bay Beach Reserve

The LVA states that *“the Project’s tower is prominent in the view and its relative closeness to the viewer, in front of the core of the city centre, makes it appear as the largest building in the view, other than the prominent form of Sky Tower.”*⁶ I concur that the proposal appears as the largest building in the view, with the height, form and scale completely at odds with the urban and coastal landscape setting. I fail to see how the LVA concludes that the proposal will have low adverse visual effects from here and retains the primacy of the high-rise core and skyline backdrop.

VS6C – Te Whero East

The LVA states that *“the tower height is not remarkable or out of context whilst clearly anchoring the western end of the Waterfront axis as intended for this site in the Wynyard Quarter urban framework and providing a destination attraction on the axis.”*⁷ In my opinion the additional height of the tower has significant adverse effects on the urban and coastal character of the Precinct, completely dominating the view. A 62m building would be of an appropriate height, form and scale in this context creating a logical stepping down from the ASB building to the ‘six-pack’ Silos. I do not consider that the building *“contributes to the legible and characterful urban form of the Precinct.”*⁸

VS7C – North Wharf

The LVA states that *“the visual effects associated with the Project are assessed to be positive, contributing to the legible and characterful urban form of the Precinct.”*⁹ I fail to see how they conclude that the visual effects will be positive. The visual simulations graphically illustrate that the proposed 81.35m building would have moderate to high adverse visual effects due to its excessive height, bulk, and lack of integration with the surrounding landscape context.

Conclusions

In my opinion, the proposed 81.35m building would have moderate to high adverse visual effects due to its excessive height, bulk, and lack of integration with the surrounding landscape context. These effects include visual dominance, increased shading of public spaces, and reduced streetscape and public space amenity.

I do not consider that the proposal is appropriate in scale to the street network and the prominent waterfront location, or provides a suitable transition in height between the core central business district and the harbour.

I consider that a 62m height building would mitigate these effects and align with the planning provisions of I214 Wynyard Precinct, and reinforce the urban structure and legibility.

I do not consider that the height of the building complements and reinforces key public open spaces within Wynyard Precinct and development within the Viaduct Harbour precinct while providing an appropriate scale and transition in relation to the street network, lanes, the harbour and coastal environment and the core central business district in accordance with Policy I214.3(3) of the Wynyard Precinct.

⁶ UDLA, 9 April 2026 [page 41]

⁷ UDLA, 9 April 2026 [page 43]

⁸ UDLA, 9 April 2026 [page 43]

⁹ UDLA, 9 April 2026 [page 44]

Adverse Effects on Residential Amenity

- While the UDLA claims that the separation distance and remaining outlook mitigate adverse effects on residential amenity for 30 Madden, the increased dominance effects, adverse visual effects and increased sense of enclosure are substantial and should not be dismissed as acceptable in a high-amenity urban precinct.
- The UDLA in fact concludes that *“The west facing apartments in the nine and thirteen storey Daldy Street apartment building have been assessed to have moderate (**more than minor**) adverse visual amenity effects.”*¹⁰

Shading and Loss of Sunlight

- The proposal will cast shade on 30 Madden during the winter solstice, affecting both the west and north façades for up to 1.25 hours in the middle of the day during the winter. Even if described as “fleeting,” this loss of sunlight during the coldest part of the year will negatively impact residents’ quality of life.
- Silo Park, a key public open space, will also experience increased shading in the late afternoon during spring and summer, including over the playground area. This reduces the usability and enjoyment of the park during peak times for families and visitors, despite the UDLA considering this *“to have a limited effect on enjoyment of the park and playground, given also that people tend to seek out summer shade associated with the park and playground.”*¹¹

Precedent for Over Development

- The proposal continues a trend of developments in the Wynyard Quarter exceeding permitted height controls, eroding the integrity of the planning framework and setting a precedent for further over development.
- The cumulative effect of these infringements is a loss of the intended urban form, with the original marker building sites losing their distinctiveness and the Precinct’s skyline becoming increasingly cluttered and inconsistent.

Inadequate Response to Urban Design Principles

- The development’s bulk and massing, particularly the tower’s large floor plates above 31m, exceed maximum dimensions set out in the Precinct provisions. This results in a building that is not sufficiently modulated or broken down to a human scale, contrary to the principals of good urban design.
- The proposal’s justification that the site is “intended for a marker building” does not excuse the disregard for controls on bulk, height, and the need for sensitive integration with the surrounding landscape and coastal context.

Public Access and Amenity Concerns

- While the proposal offers a 7m setback from the western water edge for public access, this is still privately owned and may not guarantee long term, unrestricted public use. The activation of the ground plane with food and beverage venues does not compensate for the loss of openness and increased privatisation of the waterfront.

¹⁰ UDLA, 9 April 2026 [page 47]

¹¹ UDLA, 9 April 2026 [page 35]

Insufficient Mitigation of Adverse Effects

- The design changes made in response to Council and Design Panel feedback (e.g., façade modulation verandah additions) are minor and do not adequately address the fundamental issues of excessive height, bulk, and adverse effects on the streetscape, public spaces and neighbouring properties.

MFE Revised Notice of Decisions

- The MFE's Revised Notice of Decisions for the 188 Beaumont Street Project, dated 18 December 2025, states:

"The project is a development project that would have significant regional benefits (my emphasis) by increasing the supply of housing in the Auckland region by approximately 215 residential apartment units, addressing housing needs by offering a mix of one-, two- and three-bedroom units and contributing to a well-functioning urban environment in the Auckland city centre."

In my opinion, given the prime waterfront location; outlook; the size, design and layout of the apartments will result in premium, high-end apartments catering towards the upper end of the market. The proposal will not provide affordable housing. As evidenced within the 30 Madden complex, one bedroom 50m² apartments start at the \$1m price point, 2-bedroom 100m² apartments from \$2m, and upwards from there. I fail to see how the proposal will have 'significant regional benefits'.

3. Conclusion

These concerns highlight the tension between the desire for a landmark building and the need to respect established urban design principles, streetscape and public amenity, residential amenity, and the character of the Wynyard Precinct.

The adverse effects on residential amenity, public open space, urban form, and the coastal environment outweigh the claimed benefits. The development does not sufficiently respect the planning framework, the expectations of the public and existing residents, or the long-term vision for a balanced, high-quality urban precinct.

I also note that the LVA memorandum for the Referral Application stated

*'The height of the proposed 23 storey central tower element and the adjacent 10 storey Beaumont and 8 storey Marina buildings have been informed by comprehensive QS cost planning through iterations of the design relative to the current Auckland construction and residential apartment sales markets.'*¹²

This should not be a determinant for justifying the additional height.

4. Relief Sought

We urge the Expert Panel to reject the 80m height extension for the 188 Beaumont Street project. The development should be strictly confined to the established 62m maximum marker building guideline under the Auckland Unitary Plan frameworks, ensuring the height and density aligns with human-scale urban design.

Regards

Rob and Robyn Pryor

[Redacted signature block]

¹² Urban Design, Landscape and Visual Assessment Memorandum, Boffa Miskell, 25 August 2025 [p. 15]

Appendix 1: Graphic Illustrations indicating the permitted 62m height limit



Figure 1: North elevation (Source: WAM Architectural Drawings)



Figure 2: Architectural render looking towards the proposal from Silo Park (Source: WAM Architectural Drawings)



Figure 3: Architectural render looking west from the Wind Tree to the Jellicoe Street frontage of the proposal (Source: WAM Architectural Drawings)



Figure 4: Architectural render from the water (Source: WAM Architectural Drawings)



Proposed View

Boffa Miskell
www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. If it is intended to support the Client's application under the Fast-track Approvals Act 2024 and it may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application, Boffa Miskell Limited has assumed due care in preparing this plan. It does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

Viewpoint Details

NZTM Easting : 1 756 155 mE
NZTM Northing : 5 923 343 mN
Elevation/Eye Height : 2.9m / 1.6m
Date of Photography : 12:00pm 8 December 2025 NZDT

Horizontal Field of View : 40°
Vertical Field of View : 30°
Projection : NA
Image Reading Distance @ A3 is 50 cm

Data Sources: Photography - BML, GIS data - AC aeriels and LIDAR 2016 NZTM / AVDM6, Model - Wynyard Quarter Masterplan Model, McIndoe Urban_Site5_110m Option_24.9.21.skp

188 BEAUMONT STREET
View from Sulphur Point Beach Reserve - Single Frame
Date: February 2026 | Revision: 2
Plan prepared by Boffa Miskell Limited
Project Manager: [Redacted] | Drawn: JMy | Checked: RdL

VS 1C

Figure 5: VS1C View from Sulphur Point Beach Reserve (Source: Boffa Miskell Urban Design and Landscape Assessment)



Boffa Miskell
www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. If it is intended to support the Client's application under the Resource Management Act 1991 and it may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application, Boffa Miskell Limited has exercised due care in preparing this plan, it does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

Viewpoint Details

NZTM Easting : 1 755 324 mE
NZTM Northing : 5 921 647 mN
Elevation/Eye Height : 12.8m / 1.6m
Date of Photography : 2:10pm 8 December 2025 NZDT

Horizontal Field of View : 40°
Vertical Field of View : 30°
Projection : NA
Image Reading Distance @ A3 is 50 cm

Data Sources: Photography - BML, GIS data - AC aeriels and LIDAR 2016 NZTM / AVD46, Model - Wynyard Quarter_Masterplan Model_McIndoe Urban_Site5_110m Option_24.9.21.skp

188 BEAUMONT STREET
View from Shelly Beach Road Overbridge - Single Frame
Date: February 2026 | Revision: 2
Plan prepared by Boffa Miskell Limited
Project Manager: [Redacted] | Drawn: JMy | Checked: RdL

VS 2C

Figure 6: VS2C View from Shelly Beach Road Overbridge (Source: Boffa Miskell Urban Design and Landscape Assessment)



Proposed View

Boffa Miskell
www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. If it is intended to support the Client's application under the Resource Management Act 1991 and it may be relied upon for the purposes of assessing the application, Boffa Miskell Limited has exercised due care in preparing this plan. It does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

Viewpoint Details

NZTM Easting : 1755673 mE
NZTM Northing : 5921357 mN
Elevation/Eye Height : 2.6m / 1.6m
Date of Photography : 15/11/2025 NZDT

Horizontal Field of View : 40°
Vertical Field of View : 30°
Projection : NA
Image Reading Distance @ A3 is 50 cm

Data Sources: Photography - BML, GIS data - AC aerials and LIDAR 2016 NZTM / AVD46, Model - Wynyard Quarter_Masterplan Model_McIndoe Urban_SiteS_110m Option_24.9.21.skp

188 BEAUMONT STREET
View from St Mary's Bay Beach Reserve - Single Frame

Date: February 2026 | Revision: 2
Plan prepared by Boffa Miskell Limited
Project Manager: [Redacted] | Drawn: J.Bly | Checked: R.B.

VS 3C

Figure 7: VS3C View from St Marys Bay Beach Reserve (Source: Boffa Miskell Urban Design and Landscape Assessment)



Boffa Miskell www.boffamiskell.co.nz	This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. If it is intended to support the Client's application under the Fast-track Approval Act 2021 and it may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application, Boffa Miskell Limited has accepted due care in preparing this plan. It does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.	Viewpoint Details NZTM Easting : 1 756 971 mE NZTM Northing : 5 92 1252mN Elevation/Eye Height : 2.3m / 1.16m Date of Photography : 10:23am 6 December 2025 NZDT	Data Sources: Photography - BML, GIS data - AC aerials and LIDAR 2016 NZTM / AVDM46, Model - Wynyard Quarter Masterplan Model, McIndoe Urban_Site5_110m Option_24.9.21.skp Horizontal Field of View : 40° Vertical Field of View : 30° Projection : NA Image Reading Distance @ A3 is 50 cm	188 BEAUMONT STREET View from Te Wero East - Single Frame Date: February 2026 Revision: 2 Plan prepared by Boffa Miskell Limited Project Manager: [Redacted] Drawn: Jily Checked: RdL	VS 6C
--	--	--	---	---	--------------

Figure 8: VS6C View from Te Wero East (Source: Boffa Miskell Urban Design and Landscape Assessment)



Boffa Miskell
www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. It is intended to support the Client's application under the Fast-track Approvals Act 2024 and it may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application. While Boffa Miskell Limited has exercised due care in preparing this plan, it does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

Viewpoint Details

NZTM Easting : 1 756 796 mE
NZTM Northing : 5 921 337 mN
Elevation/Eye Height : 3.0m / 1.6m
Date of Photography : 10.40am 6 December 2025 NZDT

Data Sources: Photography - BML, GIS data - AC aerials and LiDAR 2016 NZTM / AVD46, Model - Wynyard Quarter Masterplan Model, McIndoe Urban_Site5_110m Option_24.9.21.skp

Horizontal Field of View : 40°
Vertical Field of View : 30°
Projection : NA
Image Reading Distance @ A3 is 50 cm

Project Manager: [Redacted] | Drawn: JMy | Checked: RdL

188 BEAUMONT STREET
View from North Wharf - Single Frame
Date: February 2026 | Revision: 2
Plan prepared by Boffa Miskell Limited

VS 7C

Figure 9: VS7C View from North Wharf (Source: Boffa Miskell Urban Design and Landscape Assessment)



Proposed View

Boffa Miskell
www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. It is intended to support the Client's application under the Fast-track Approval Act 2024 and it may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application. While Boffa Miskell Limited has exercised due care in preparing this plan, it does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

Viewpoint Details

NZTM Easting : 1 756 679 mE
NZTM Northing : 5 921 642 mN
Elevation/Eye Height : 3.5m / 1.6m
Date of Photography : 11:16am 8 December 2025 NZDT

Horizontal Field of View : 40°
Vertical Field of View : 30°
Projection : NA
Image Reading Distance @ A3 is 50 cm

Data Sources: Photography - BML, GIS data - AC aerials and LiDAR 2016 NZTM / AVD46, Model - Wynyard Quarter_Masterplan Model_McIndoe Urban_Site5_110m Option_24.9.21.akp

188 BEAUMONT STREET
View from corner of Hamer & Brigham Street - Single Frame

Date: February 2026 | Revision: 2
Plan prepared by Boffa Miskell Limited

Project Manager [redacted] | Drawn: JMy | Checked: RdL

VS 8C

Figure 10: VS8C View from corner of Hamer and Brigham Street (Source: Boffa Miskell Urban Design and Landscape Assessment)