

188 Beaumont Street Fast-track

Auckland Council Specialist Memo

Annexure 1:

Policy Planning

Lee-Ann Lucas

16 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: 188 Beaumont Street

Fast-Track application number: EPA: FTAA- 2604-1205
Council: BUN60464683

2.0 Technical Specialist Memo - Policy

To:

Lewis So- Intermediate Planner
Russell Butchers - Principal Project Lead

From:

Lee-Ann Lucas, Senior Policy Planner

Qualifications
& Relevant
Experience:

I hold the qualification of: Bachelor in Regional Planning from Massey University and have approximately 35 years of experience in planning.
I have prepared expert evidence and relevant RMA assessments for resource consent applications, plan changes and notices of requirement for designation, and have appeared as an expert witness before consent authorities.

Preparation in
Accordance
with the Code
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:



Date:

16 July 2026

3.0 Executive Summary / Principal Issues

This memo reviews the matters of building height and the provision of marine and port related floorspace within the proposed development of this site.

The site has been identified as a 'marker site' which is specifically identified to 'mark' the axis points of the underlying design principles for Wynyard Quarter. These sites are provided with additional height so as to identify them and to provide an interesting and varied skyline. However, this function is not just achieved through height, as the design of the building is also intended to contribute. This can be seen in the design of the ASB North Wharf Building which is another marker building in the eastern portion of the Wynyard precinct.

The marker building on this site also has an additional function in that its location within and adjacent to the marine precinct and the active wharf is to contribute to and/or compliment the continued operation and growth of this area through the required provisions of marine and port related floorspace to a height of 18m.

In my opinion the proposed height of approximately 22m over the permitted 'marker building' height and the proposed use of only residential with food and beverage activities at the ground floor run contrary to the policy direction for the development of this site.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- 188 Beaumont Street, Central Auckland Fast Track Approval Substantive Application – AEE and Statutory Analysis 9 April 2026.
- 188 Beaumont Street Design Statement – Fast Track Approval Architecture plans – Appendix 5, Parts 1-7
- Property Economics – 188 Beaumont St Development – Economic Impact Assessment (March 2026) – Appendix 16
- 188 Beaumont Street Redevelopment - Wider Regional and National Economic Benefits Assessment (26 March 2026) – Appendix 17
- Auckland Unitary Plan (Operative in Part) Chapter I214 Wynyard Quarter Precinct
- Auckland Unitary Plan (Operative in Part) Chapter H8 Business - City Centre Zone
- Primary Statement of Evidence of Severin Soder on Hearing Topic 020I Precincts – I214 Wynyard Precinct – 17 November 2023

- Joint planning evidence of Elisabeth Laird and Sarah Wong for Topics 020G – Precincts - I211 Viaduct Harbour Precinct and 020I – Precincts - I214 Wynyard Precinct – 17 November 2023
- The Wynyard Precinct Urban Design Framework 2014

5.0 Specialist Assessment

Proposal

1. The 188 Beaumont Street fast-track application (**the application**) is for an urban development project in the city centre involving a marker building comprising 210 residential apartments across three buildings, ground floor retail activities and associated car parking including enabling earthworks and installation of underground infrastructure.
2. The application site (**the site**) is zoned Business – City Centre zone in the Auckland Unitary Plan (Operative in Part) 2016 (**AUP**). The site is also subject to I214 the Wynyard Precinct.
3. The application has been lodged under the Fast-track Approvals Act 2024 (**FTAA**). In accordance with s3 of the FTAA:

The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.
4. My comments relate to the planning policy considerations relating to the proposed building height and the provision of marine and port related floorspace for this particular site within the Wynyard Precinct.

Comments

5. These comments relate to the proposal to not provide marine and port related floorspace within the development and to the proposal to exceed the maximum permitted height of the marker building on this site by approximately 22m. Comments on other detailed aspects such as traffic, economic, urban design, landscaping, natural hazards, and infrastructure are provided by the relevant experts.
6. It is noted that on 2 July 2026 the Policy, Planning and Development Committee endorsed the preparation of a plan change for the entire Wynyard Precinct (Chapter I214) in the Auckland Unitary Plan, including the land south of Pakenham Street. Specific to this assessment the proposed plan change will include a review of the height of marker buildings and the requirements associated with industry and marine retail (subject to the outcome of market analysis).

Marine and port related floorspace

7. The marine and port related activities in the Wynyard Precinct are well established within this sector of the city centre having specific functional requirements to be alongside the wharf. The Urban Design Framework 2007 (**UDF**)¹ identified and accommodated a marine precinct in this western area of the Wynyard Precinct to recognise their historical establishment and to respect and enable the maintenance and growth of the marine activities in this city centre location after the decommissioning of the historic ‘tank farm’ facilities.
8. At the time, these marine and port activities were considered significant for their contribution to both the local and international economy in providing for the berthing and maintenance of fishing vessels and commercial boats and more recently the refit of international superyachts. The UDF provided the base for the Wynyard Quarter: Urban Design Background Information 2010 document, which was then appended as Annexure 14 to the Auckland Council District Plan – Central Area.
9. The UDF was refreshed in 2014 continuing to provide for marine and port related activities within the marine precinct along the western extent of Wynyard Quarter – known as the Marine precinct². It is acknowledged that this precinct also coincides with the Jellicoe precinct over the subject site. The Jellicoe precinct provides for the social and cultural heart of the Wynyard Quarter to be supported by complementary retail and entertainment activities on Jellicoe Street.
10. The provisions for the retention and potential expansion of marine related activities are carried through into the City Centre Masterplan 2012, continuing to acknowledge this western area for these. Marine related activities include recreational and commercial vessel berthage, vessel maintenance, superyacht refits, commissioning, dry storage and boat stacking facilities, and marine retail, along with all commercial and leisure fishing and retail related businesses. The requirement of marine related floorspace in this area specifically contributes to and supports the marine precinct.
11. The Business - City Centre zone covers the entire waterfront area setting out provisions to enable a scale of intensification that recognises the role of the city centre, and to manage activities to protect the identified amenity of the area and limit the potential for reverse sensitivity effects.
12. The underlying City Centre zone provides for marine and port activities through the following policies:

¹ Wynyard Quarter: Urban Design Framework 2007

² Wynyard Precinct - Urban Design Framework February 2014. Pg.12.

(19) Provide for a wide range of activities along the waterfront, while continuing to provide for those activities requiring a harbour location

(23) Identify and encourage specific outcomes in areas of the city centre that relate to:

- (a) a distinctive built character; and/or*
- (b) a concentration of particular activities; and/or*
- (c) activities that have specific functional requirements; and/or*
- (d) significant transformational development opportunities*

13. Chapter I214 Wynyard Precinct, of the AUP, further supports the division of areas within the Wynyard Quarter, and in line with the policies above, has divided the area into seven sub-precincts -A-G. Specific provisions have been assigned to manage the location and interaction of the activities that are contained within each sub precinct and to ensure their positive interaction and contribution to the whole precinct.

14. This is supported through the following objective and policies. Under the heading of Social and economic:

Objective I214.2

(1) Wynyard precinct is redeveloped while managing potential conflicts between different uses to achieve:

...

(b) maintenance and enhancement of the regionally significant economic function of the marine, fishing and other industries and maritime passenger operations to the Hauraki Gulf islands;

Policies I214.3

(11) Enabling a diverse range of activities, high quality visitor experiences, entertainment, events and development to occur, while recognising and maintaining the economic importance of the marine and fishing industry, the bulk liquid industry and Hauraki Gulf Islands maritime passenger operations to the Auckland Region.

(12) Recognise the significant local and regional socio-economic benefits associated with providing high-quality waterfront public open space and events activity while also providing for the operational and access requirements of the marine and fishing industries, other industrial activities and maritime passenger operations.

(13) Ensure that sufficient and suitably located land, wharf, waterspace and appropriate, convenient and adequate navigation and berthing facilities are provided to accommodate the current and future operation and growth of the marine and fishing industries and maritime passenger operations, including Sub-precinct C, North Wharf, the southern face of the Western Viaduct Wharf and the western face of the

Halsey Street Extension Wharf together with the adjacent waterspace for use primarily by the fishing industry.

15. Under the heading of Reverse sensitivity and amenity:

Policies I214.3

(29) Provide for the continued efficient operation of existing and future marine, fishing and other industries, including maritime passenger operations.

16. The site is located within both sub precinct C and E identified on I214.10.7 Wynyard: Precinct plan 1 Sub-precincts. In accordance with Policy I214.3(13) Marine retail is provided for as a restricted discretionary activity and marine and port activities are provided for as a controlled activity in sub-precinct C. Other retail activity up to 1000m² is a non-complying activity in this area, reflecting the significance of the availability of this space for marine related activities as a priority.
17. Sub-precinct E more or less reflects the area referred to as the Jellicoe precinct in the UDF 2014. For the portion of the subject site within Sub precinct E, development is limited to “marine and port activities and marine retail only for the first 18m above ground level” (approx. 3 storeys). This requirement is stipulated in I214 Wynyard: Precinct Plan 7 – additional activity restrictions³. Food and beverage greater than 100m² GFA is provided for as a restricted discretionary activity, however this is further subject to a risk level assigned on Precinct Plan 10⁴, which is reliant on the date when all hazardous industry located within Sub-precinct F discontinue operation. These activities then become Permitted. There is currently one remaining hazardous facility in the Wynyard Precinct – the Sanford fish processing facility.
18. Chapter I214 has recently been reviewed and reset through Plan Change 78 Intensification to the Auckland Unitary Plan and maintains the approach to ensure the co-existence of the established marine and port activities in the western and waterfront portion of the Wynyard Precinct, while enabling additional intensification.
19. The proposed development does not propose any marine or port related activities or marine retail within the floorspace of the development. Food and beverage spaces are proposed at the ground level facing out on to Jellicoe and Beaumont Streets. Carparking is proposed within the podium to a height of four levels and residential is proposed for the remainder of the buildings.
20. The applicant acknowledges that the proposed development would decrease the amount of marine industry land and floorspace within the Wynyard Precinct and states that this would have a minor economic impact.⁵ To support this, the applicant refers to an economic

³ Chapter I214 Wynyard: Precinct Plan 7 – additional activity restrictions. AUP Pg. 22.

⁴ Chapter I214 Wynyard Precinct Plan 10 Auckland Unitary Plan. Pg. 55.

⁵ 188 Beaumont Street development Fast-track application, Economic Impact Assessment, Property Economics. March 2026. Pg 7.

assessment (provided as part of the s67 requirements) undertaken of the marine related floorspace within the Wynyard Precinct (excluding the subject site)⁶ which states that *“the existing marine floorspace within Wynyard Quarter (excluding the subject site) already exceeds the projected demand for the next 15 years, demonstrating Wynyard Quarter has ample capacity to meet future needs.”*⁷

21. The assessment provides a summary of all marine related floorspace in the Wynyard Precinct (excluding 188 Beaumont Street) to justify the reduction proposed through the redevelopment of 15 Westhaven Drive. The property at 188 Beaumont is noted for future development of residential and commercial uses.
22. The assessment refers to *a significant and ongoing decline in Superyacht servicing, refitting and commissioning* and therefore due to the cost of land in the Wynyard Precinct the retention of space for these types of activities is not considered economically viable. The assessment states that these activities are relocating to other sites around Auckland, leaving the space to be occupied by other types of activities. The redevelopment of 15 Westhaven Drive does include some marine related activities that acknowledge its location in the southern end of the marine sector. The historic and continued operation of Orams Marine boat yard for refitting boats and now superyachts, is also acknowledged.
23. Although the assessment states that there is an observed decline in demand for marine related GFA and yard space between 2018 and 2021, it also says that this is expected to return to 2018 levels over the next two decades⁸. It acknowledges the marine industry as being mostly located to the west of Beaumont Street with a few exceptions elsewhere in the Wynyard precinct, noting that these other exceptions are predominantly relocating elsewhere. In my opinion this strengthens the intention that marine and port activities and marine retail space be located on 188 Beaumont Street in line with the objectives and policies for this marine precinct area.
24. However, as stated previously, the proposed plan change will be undertaking an assessment of the marine activities within the Wynyard Precinct, looking particularly at the movement of these activities in recent years to determine whether or not the current provisions of the precinct are appropriate.
25. The applicant has referred to the proposed development of the site as the residential component of the redevelopment of the adjoining Orams Marina site – directly linking to this site via the carparking podium. Food and beverage floor space at the ground floor is provided to take advantage of the site’s location near to Silo Park.

⁶ Economic Impacts - 15 Westhaven Drive. M.E. Consulting. Nov 2023.

⁷ 188 Beaumont Street development Fast-track application, Economic Impact Assessment, Property Economics. March 2026. Pg 7.

⁸ Economic Impacts - 15 Westhaven Drive. M.E. Consulting. Nov 2023. Pg 25.

26. The EIA refers to an economic assessment for marine activities undertaken by Market Economics 2023, that states “*recent locational trends in marine activity shows that Auckland’s marine industry is increasingly relocating from waterfront sites to inland industrial and mixed-use areas, with functions such as manufacturing, retail, and support services concentrating in more cost-effective and logistically accessible locations.*”
27. With reference to Chapter I214 Wynyard: Precinct Plan 7 – additional activity restrictions, it is noted that the block of land on the opposite side of Beaumont Street is identified for dwellings that are subject to a ‘no-complaint’ covenant. Such measures are put in place to assist the management of potential conflicts between different uses such as the anticipated occupation of the subject site with marine and port related activities while accommodating residential dwellings in this adjoining block.

Marine and port related floorspace conclusion

28. In my opinion the proposal does not sufficiently justify the lack of marine and port related floorspace in the proposed development. It is acknowledged the proposal seeks to capitalise on its proximity to the city centre and to contribute to the vibrancy of the location. The application places emphasis on the direction of the NPS-UD for intensification by providing residential accommodation and seeks to complement this with the proposed activities at the ground floor.
29. I find the subject site to be logically identified to provide for marine and port related activities due to its location in a contiguous band of these activities along this western harbour edge. While there may be other areas of marine related floorspace in the Wynyard Precinct those areas are more likely to be subject to the relocation movement observed by the applicant, possibly due to reverse sensitivities from the other types of activities accommodated in the wider Wynyard Precinct, or for economic reasons. I consider the locational advantages and support provided through the provisions of the AUP for the anticipated marine and port related activities for this site, provide more certainty.
30. In my opinion, the extensive residential accommodation proposed on the site is not as compatible with the adjoining active wharf as the anticipated use of the site for marine and port activities and accessory offices.
31. The proposal is therefore contrary to the objectives and policies of both the underlying zone and the Wynyard Precinct in that it is not providing for the intended marine and port related activities in this location.
32. As stated earlier, it is acknowledged that Council will be undertaking a market analysis of marine related activities within the Wynyard Precinct as part of the proposed plan change.

Building Height

33. The site has been identified as a ‘marker site’ in the Wynyard Precinct. Marker sites are located on the axis points for the underlying design principles for Wynyard Quarter that were

introduced and evolved through the various UDF spatial plans. Marker sites have additional building height to identify them and provide for an interesting and varied skyline.

34. The City Centre zone provides for the building height of these marker buildings in Policy H8.3(30) *Manage adverse effects associated with building height and form by:*

(a) transitioning building height and development densities down to neighbourhoods adjoining the city centre and to the harbour edge;

and

(c) requiring the height, form, and design of new buildings to be complementary to existing and planned built form and character of the zone and precincts;

35. Chapter I214 Wynyard Precinct provides for these buildings through the following policy: I214.3(3) *Ensure that maximum building height:*

...

b) provides a transition between the core of the precinct and the coastal edge with site-specific opportunities for taller buildings located and designed to reinforce key public open space and waterfront connections while avoiding intrusion of public views into and through Wynyard Precinct;

36. The marker building on the subject site was given additional height through the recent decisions on PC78 to reflect a recent decision that granted additional height to another marker building to the east on 37-55 Madden Street. The height for the subject site was increased through PC78 by an additional 10m from 52m to 62m. This height was specifically referenced and analysed in the joint evidence of Ms Elisabeth Laird and Ms Sarah Wong⁹ and in the evidence of Mr Severin Soder,¹⁰ an urban design architect with Architectus engaged by Auckland Council to provide urban design advice.
37. In responding to submissions seeking additional height to the marker building at 188 Beaumont Street, the additional height to 62m was determined by the IHP as being appropriate given the recent approval of additional height for the marker building on the corner of Beaumont and Madden Streets. However, any additional height sought for this site was considered inappropriate given the policy direction of transitioning height to the Waitemata Harbour.
38. The applicant acknowledges the recently approved increase to 62m. However, the applicant seeks to exceed this height by approximately 22m for a proposed tower at the centre of the site to accommodate approximately 126 residential apartments.

⁹ EIC E Laird and S Wong Planning Topics 020G Viaduct Harbour Precinct and 0201 Wynyard Precinct. 21 Nov 2023. Pg 49.

¹⁰ EIC S Soder Urban Design – Topic 020I I214 Wynyard Precinct. 17 Nov 2023. Pg 45/46.

39. They also seek additional height increases for the building to the west, referred to as the Marina building, from 18m to approximately 34m and the building to the east, referred to as the Beaumont building, from 31m to 39m. It is noted that the Marina building was also provided with an increase in height through the PC78 hearing process from 10m to 18m to reflect the proposed 18m maximum height of buildings in the rest of sub-precinct C. Despite this proposed height increase, the applicant offers this lower building as a site specific response to the policy direction of the precinct in transitioning height down to the harbour edge.
40. The applicant notes that a number of properties in the surrounding precinct area have been granted additional height to that indicated by the precinct plan and that these in turn are undermining the legibility of the marker building on this site. This is also acknowledged in Mr Soder's evidence noting that these additional height increases have tended to follow an 'overs and unders' approach and therefore the balance of the overall built form is not too dissimilar to that anticipated for the site. Mr Soder notes that these additional height applications have been appropriately addressed through the resource consent process, addressing the individual site and design elements of each accordingly. Mr Soder does not consider such increases to compromise the eligibility of the marker buildings at their reviewed height of 62m.¹¹
41. With reference to the origin of the marker buildings, in my opinion, the distinction of these buildings as markers is not just about their height but also about their design. I refer to the ASB North Wharf building at the eastern end of the Wynyard Precinct – distinguishable by the form of its roof and cladding. The applicant acknowledges the height of the ASB building at 52m in Appendix 5 Architectural Drawings Part 2 page 26. However, I leave the assessment of the design elements to Ms Michelle Chan and Ms Sheerin Samsudeen of Auckland Council's Urban Design review team in their capacity as urban design reviewers.

Building heights conclusion

42. The applicant seeks consent to increase the heights of these buildings to provide for 210 apartments as a development project with regionally significant benefits. In my opinion, residential accommodation and particularly to the proposed extent, would not be the only use of this site. Given the policy direction for the location, marine and port activities and marine retail should be incorporated into the design.
43. The site is located within and immediately alongside an active marine and wharf edge and historically has been anticipated to provide for activities that support and complement the continued use by this industry. The site also functions as a marker building in line with the underlying design concepts of the wider precinct area.
44. In my opinion, the proposed development substantially exceeds the scale and height envisaged by the Wynyard Precinct provisions. The Central Tower, Marina Building, and

¹¹ EIC S Soder Urban Design – Topic 020I I214 Wynyard Precinct.17 Nov 2023. Pg 45/46.

Beaumont Building exceed the permitted height limits by approximately 22m, 16m, and 8m respectively. Such departures are inconsistent with the policy direction, which provides for taller buildings only on identified landmark sites to enhance the skyline, while ensuring a transition in building scale towards the harbour edge.

45. Again, it is acknowledged that the overall height of buildings within the Wynyard Precinct is being reviewed as part of the proposed plan change. Marker buildings in particular are being considered for greater height where appropriate.

6.0 Recommendation

In my opinion, the proposed application is contrary to objectives and policies of both the underlying zone and the Wynyard Precinct in that it is not providing for the intended marine and port related activities in this location.

The proposed additional height far exceeds the development height anticipated by the Wynyard Precinct and is contrary to the policy direction to provide for taller buildings on these marker sites to add interest to the skyline, but to otherwise transition height down to the harbour edge.

7.0 Supporting Documents

- Primary Statement of Evidence of Severin Soder on Hearing Topic 020I Precincts – I214 Wynyard Precinct – 17 November 2023
- Joint planning evidence of Elisabeth Laird and Sarah Wong for Topics 020G – Precincts - I211 Viaduct Harbour Precinct and 020I – Precincts - I214 Wynyard Precinct – 17 November 2023