

Precinct Downtown Development Limited
C/- RCP Limited
25 Hargreaves Street
Freemans Bay
Auckland 1010

Attention: Bianca Hurrell

Dear Bianca

Downtown West Development Hazardous substances addendum report

1 Introduction

This letter report has been prepared to address Item 22 relating to hazardous substances in the *Section 67 Request for Information: FAST TRACK: Council ref: BUN60460864 – The Downtown Carpark Redevelopment – Te Pūmanawa o Tāmaki (FTAA-2512-1158)* dated 26 March 2026:

- a *Please provide an inventory of all hazardous substances proposed to be stored and used in site (including substances- cleaning and maintenance products- that may have a PA status)*
- b *Appendix A of the Hazardous Substances Assessment (Downtown West Carpark Basement Preliminary plans)*
- c *Clarity is requested on the storage capacity of the hazardous substance's bunds - whether they will be at a minimum of 110% capacity?*

Responses to these queries are provided in the following section.

Additionally, as part of developed design, minor modifications to the proposed diesel tank volumes have been provided and are presented in response to query a) in the following section. There is no change to the conclusions of the report or level of effect as assessed in the Hazardous Substances Assessment dated November 2025. The management measures presented in the draft Hazardous Substances Management Plan are also unchanged.

2 Item 22 responses

- | |
|--|
| a <i>Please provide an inventory of all hazardous substances proposed to be stored and used in site (including substances- cleaning and maintenance products- that may have a PA status)</i> |
|--|

Diesel inventory has been provided. Following consideration of back-up power generation requirements as part of developed design, minor adjustments have been made to the tank volumes as noted in **Table 2.1** below.

Table 2.1: Changes to proposed diesel tank volumes

Location	Application assessment (November 2025)	Update (April 2026)
Bulk tanks - Basement level B4	13,000 L (3 × 4,333 L)	15,000 L (2 × 6,000 and 1 × 3,000 L)
Day tanks (generators) - Level 1 podium	3,600 L (3 × 1,200 L)	No change
Day tanks (generators) - Basement level B1	1 × 1,200 L	No change
Day tanks (fire pumps) - Basement level B1	1 × 500 L	400 L (2 × 200 L) Relocated from T2 generator room to sprinkler room on same floor level.
Total	18,300 L	20,200 L

Section 3.3 of the HSA describes the likely inventory of packaged substances:

Other hazardous substances that may be used on-site are likely to include packaged products for cleaning and disinfection of mechanical water systems in the building, including biocides, scale control, corrosion control, dispersants and antifoams. These are generally expected to have some Class 6 toxicant properties or Class 8 corrosive properties, and some Class 9 ecotoxic classifications¹.

The type and volume of these substances will depend on the specialist certified contractor engaged for the water quality control and building maintenance activities. It is expected that volume of these products stored on site will be minimal (brought to site as required during compulsory monthly maintenance) and that, if necessary, they will be kept in closed containers within a bunded enclosure in a secure plant area. It is therefore highly unlikely that the quantities of these substances will exceed permitted thresholds described in the AUP discussed further in Section 5.1.

Section 5.1 of the HSA reiterates that the permitted activity thresholds are far in excess of what may be stored at the site for cleaning and maintenance products:

As previously mentioned [in Section 3.3 as quoted above], the other hazardous substances that may be used on-site are expected to be in quantities that have a permitted activity status. Examples of substances that may be required at times include biocides or cleaning products, which can be corrosive (Class 8) or chronically toxic to humans (Class 6) and other organisms (Class 9), or corrosion control agents, which are likely to have ecotoxic classifications (Class 9). Of these classifications, the most restrictive permitted quantity applies to those with acute ecotoxicity classifications 9.1A – 9.4A. The permitted quantity for these classifications under (A77) is less than 0.5 tonnes (approximately 500 L); which is more than expected to be required at any given time or stored on site. Other classifications that may apply to cleaning or maintenance products have higher permitted quantities:

- *(A71) permits up to 2 tonnes of acutely toxic substances in Class 6.1B,*
- *(A73) permits up to 6 tonnes of chronic toxicants Class 6.3-6.9 and acutely toxic Class 6.1C; and*
- *(A75) permits up to 2 tonnes of highly corrosive substances in Class 8.1, 8.2A or 8.3A.*

¹ Indicative classifications from the Environmental Protection Authority's Water Treatment Chemicals (Acutely Toxic, Corrosive) Group Standard 2020 HSR002686 and Corrosion Inhibitors (Acutely Toxic) Group Standard 2020

These volumes are far in excess of what will be required operationally at the development.

The storage and use of these substances at the Site are therefore considered to have permitted activity status under Chapter E31.

It is not possible at this stage to confirm the operational inventory of maintenance or cleaning products, but these are expected to be within the permitted quantity parameters and will be managed in accordance with the Hazardous Substances Management Plan.

b *Appendix A of the Hazardous Substances Assessment (Downtown West Carpark Basement Preliminary plans)*

Appendix A of the Hazardous Substances Assessment are site plans showing the location of the diesel tanks and refuelling point. An updated version of these plans (with revisions to reflect adjustments in tank sizes and location of fire pump day tanks) is attached as **Appendix A** to this letter.

c *Clarity is requested on the storage capacity of the hazardous substance's bunds - whether they will be at a minimum of 110% capacity?*

Permitted activity standard E31.6.3.(1)(b)(i) for tanks requires that secondary containment systems are *able to contain the maximum volume of the largest tank present plus an allowance for stormwater or fire water.*

The diesel tanks will be double-skinned and four-hour fire-rated to provide 100% integral containment with no requirement for additional fire or stormwater provision due to the enclosed nature of the double-skinned containment system. Each tank has interstitial space monitoring to identify any leaks from the internal tank.

Permitted activity standard E31.6.3.(1)(b)(ii) for drums or other smaller containers (relevant to small stores of cleaning or maintenance products) only requires spill containment systems to have capacity for *half of the maximum volume of substances stored, plus an allowance for stormwater or fire water.*

As noted above, the volumes stored on site are expected to be minimal (products to be brought to site by maintenance contractors as necessary) and can readily be provided secondary containment by use of bunded cabinets, portable pallet bunds or room bunds provided in the plant areas.

3 Applicability

This report has been prepared for the exclusive use of our client Precinct Downtown Development Limited, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

We understand and agree that our client will submit this report as part of an application under the Fast-track Approvals Act 2024 and that an Expert Panel as the consenting authority will use this report for the purpose of assessing that application. We understand and agree that this report will be used by the Expert Panel in undertaking its regulatory functions.

Compliance with the Environment Court Practice Note 2023

We confirm that, in our capacity as authors of this report, we have read and abided by the Environment Court of New Zealand's Code of Conduct for Expert Witnesses contained in the Practice Note 2023

Rose Turnwald: I am a Specialist Environmental Engineer at Tonkin & Taylor Ltd (T+T). I specialise in hazardous substances management and have worked at T+T since 2018. Prior to joining T+T, I was a process engineer at a Major Hazard Facility. I have 9 years' experience in hazardous substances risk management. I hold the following qualifications – BE (Hons).

Rob Van de Munckhof: I am the Technical Director of Environmental Engineering at T+T and have worked as a Principal and Senior Environmental Engineer at T+T since 2005. I have undertaken hazardous substances risk assessments for a wide range of industries (including for mining, manufacturing and bulk fuel terminals), as well as providing technical support to Councils associated with District Plan rules for management of hazardous substances risks. I hold the following qualifications –BE (Hons).

Tonkin & Taylor Ltd

Report prepared by:

Authorised for Tonkin & Taylor Ltd by:



.....

Rose Turnwald
Environmental Engineer



.....

Peter Millar
Project Director

Technical review by:



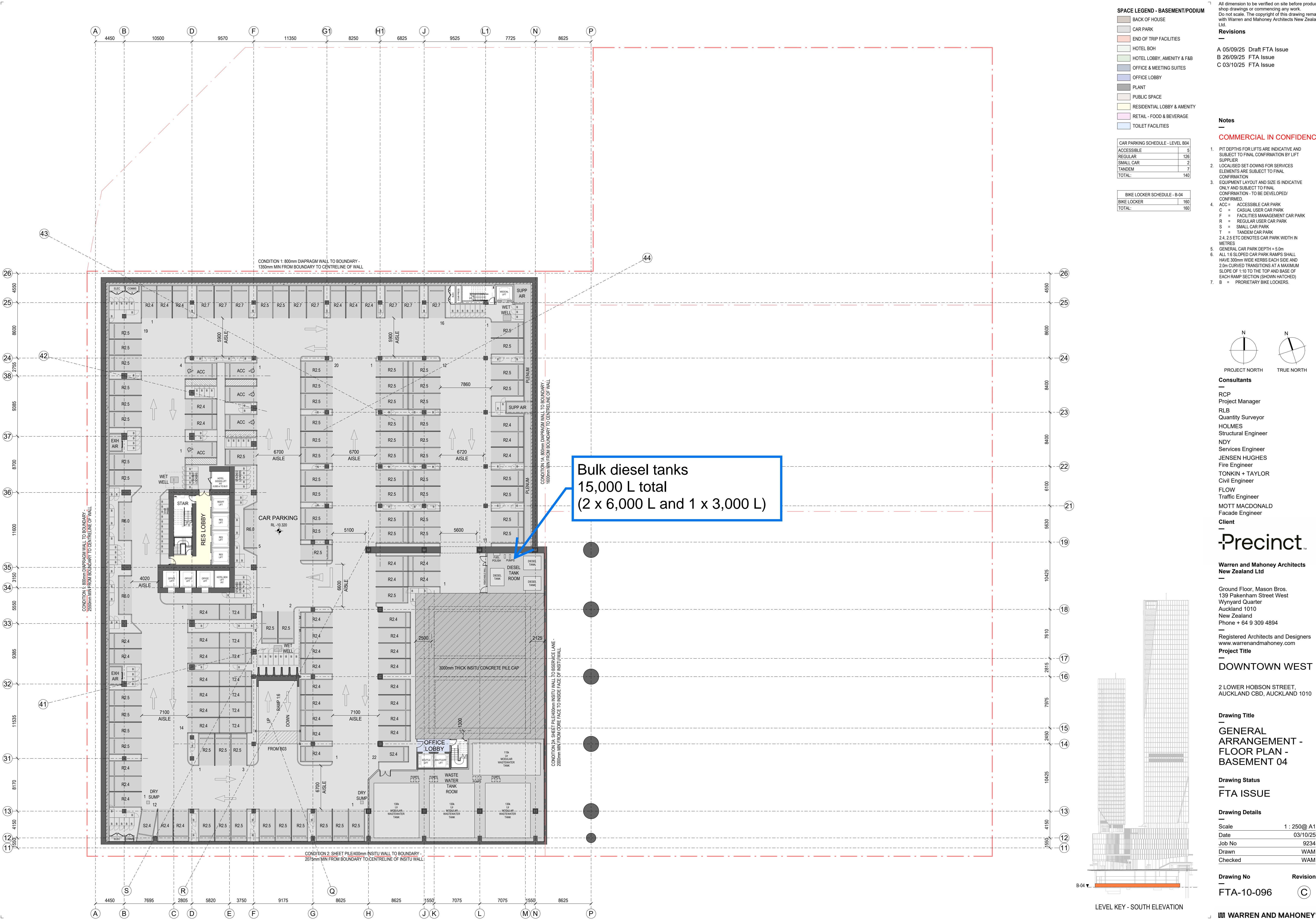
.....

Rob Van de Munckhof
Technical Director – Environmental Engineering

2-Apr-26

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Appendix A Site plans



SPACE LEGEND - BASEMENT/PODIUM

- BACK OF HOUSE
- CAR PARK
- END OF TRIP FACILITIES
- HOTEL BOH
- HOTEL LOBBY, AMENITY & F&B
- OFFICE & MEETING SUITES
- OFFICE LOBBY
- PLANT
- PUBLIC SPACE
- RESIDENTIAL LOBBY & AMENITY
- RETAIL - FOOD & BEVERAGE
- TOILET FACILITIES

CAR PARKING SCHEDULE - LEVEL B04

ACCESSIBLE	5
REGULAR	126
SMALL CAR	2
TANDEM	7
TOTAL:	140

BIKE LOCKER SCHEDULE - B-04

BIKE LOCKER	160
TOTAL:	160

All dimension to be verified on site before producing shop drawings or commencing any work. Do not scale. The copyright of this drawing remains with Warren and Mahoney Architects New Zealand Ltd.

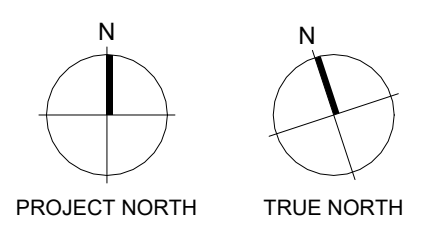
Revisions

- A 05/09/25 Draft FTA Issue
- B 26/09/25 FTA Issue
- C 03/10/25 FTA Issue

Notes

COMMERCIAL IN CONFIDENCE

- PIT DEPTHS FOR LIFTS ARE INDICATIVE AND SUBJECT TO FINAL CONFIRMATION BY LIFT SUPPLIER.
- LOCALISED SET-DOWNS FOR SERVICES ELEMENTS ARE SUBJECT TO FINAL CONFIRMATION.
- EQUIPMENT LAYOUT AND SIZE IS INDICATIVE ONLY AND SUBJECT TO FINAL CONFIRMATION - TO BE DEVELOPED/CONFIRMED.
- ACC = ACCESSIBLE CAR PARK
C = CASUAL USER CAR PARK
F = FACILITIES MANAGEMENT CAR PARK
R = REGULAR USER CAR PARK
S = SMALL CAR PARK
T = TANDEM CAR PARK
2.4, 2.5 ETC DENOTES CAR PARK WIDTH IN METRES.
- GENERAL CAR PARK DEPTH = 5.0m
- ALL 1:6 SLOPED CAR PARK RAMPS SHALL HAVE 300mm WIDE KERBS EACH SIDE AND 2.0m CURVED TRANSITIONS AT A MAXIMUM SLOPE OF 1:10 TO THE TOP AND BASE OF EACH RAMP SECTION (SHOWN HATCHED).
- B = PROPRIETARY BIKE LOCKERS.



- Consultants**
- RCP Project Manager
 - RLB Quantity Surveyor
 - HOLMES Structural Engineer
 - NDY Services Engineer
 - JENSEN HUGHES Fire Engineer
 - TONKIN + TAYLOR Civil Engineer
 - FLOW Traffic Engineer
 - MOTT MACDONALD Facade Engineer
- Client**



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Registered Architects and Designers
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Project Title

DOWNTOWN WEST

2 LOWER HOBSON STREET,
AUCKLAND CBD, AUCKLAND 1010

Drawing Title

GENERAL ARRANGEMENT - FLOOR PLAN - BASEMENT 04

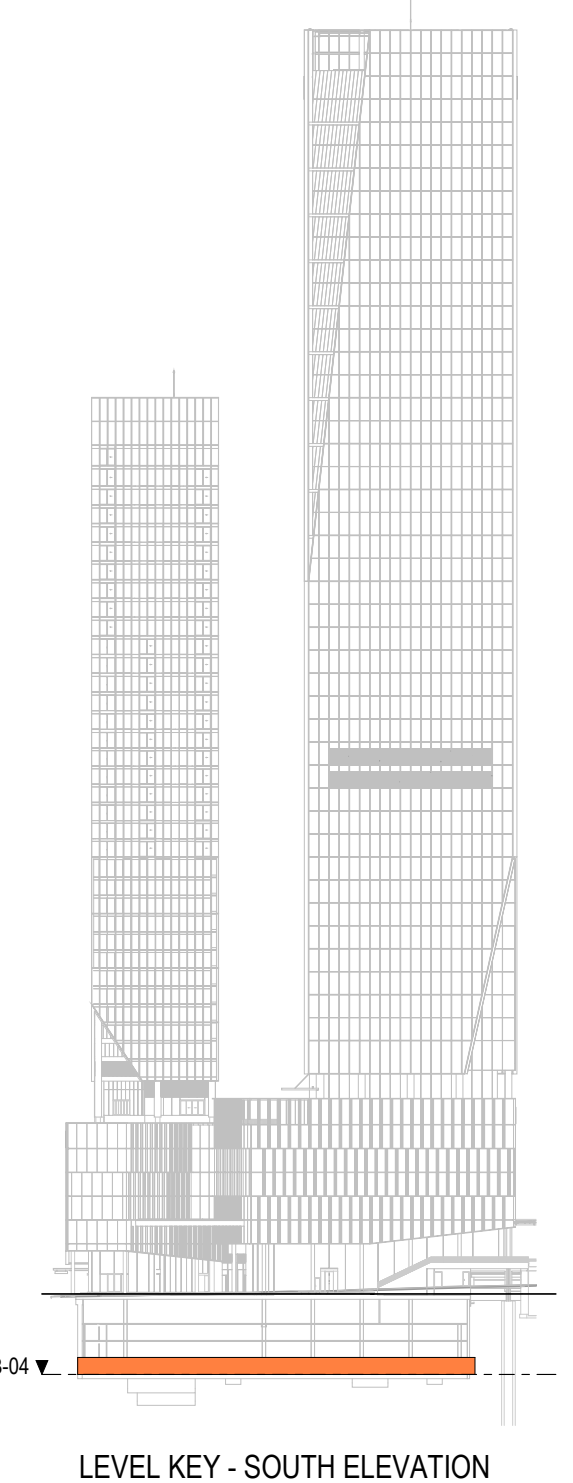
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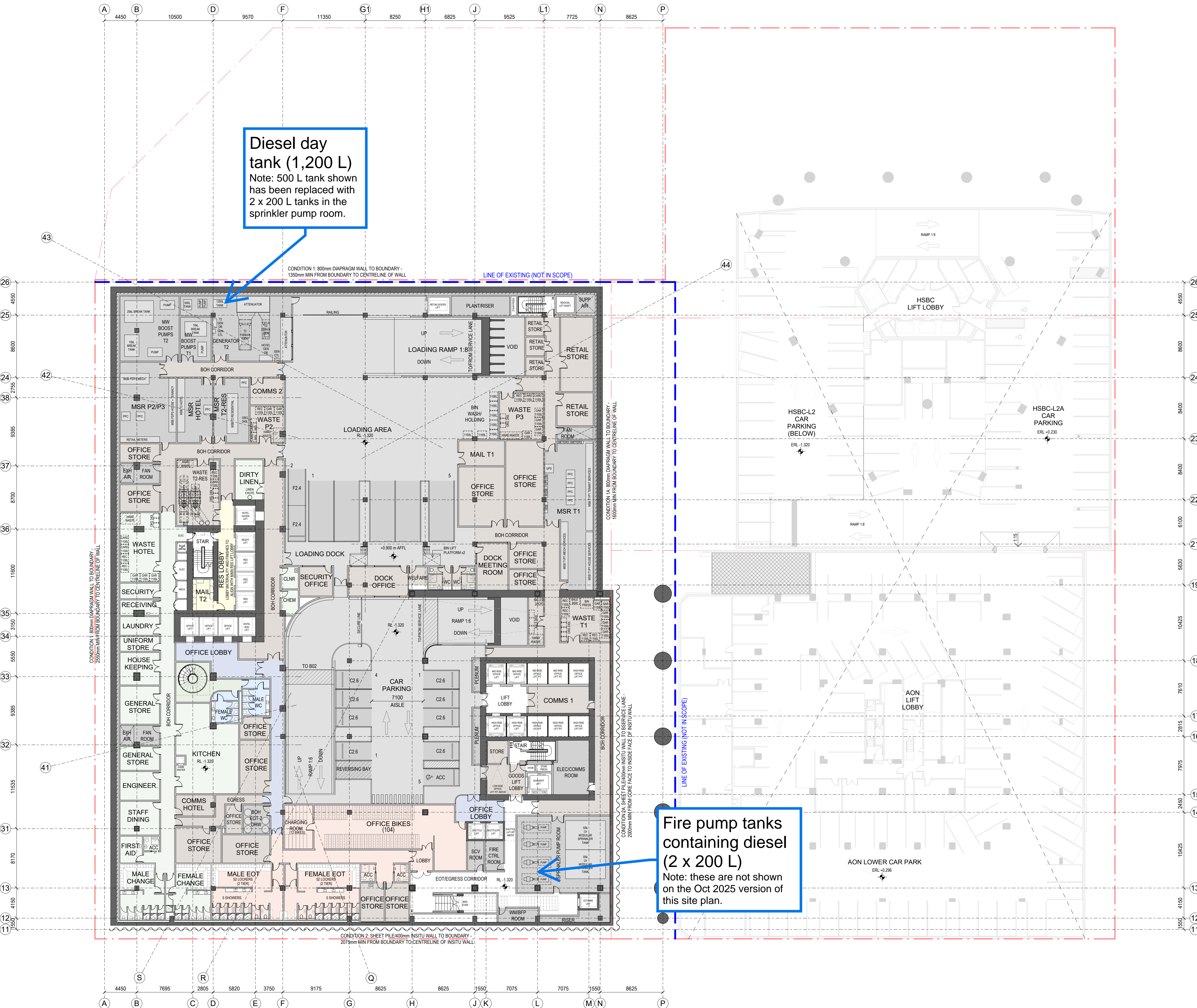
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Job No 9234
Drawn WAM
Checked WAM

Drawing No FTA-10-096
Revision C





SPACE LEGEND - BASEMENT/PODIUM

- BACK OF HOUSE
- CAR PARK
- END OF TRIP FACILITIES
- HOTEL BOH
- HOTEL LOBBY, AMENITY & F&B
- OFFICE & MEETING SUITES
- OFFICE LOBBY
- PLANT
- PUBLIC SPACE
- RESIDENTIAL LOBBY & AMENITY
- RETAIL - FOOD & BEVERAGE
- TOILET FACILITIES

CAR PARKING SCHEDULE - LEVEL B01

ACCESSIBLE	1
CASUAL	8
FACILITY MGMT	2
TOTAL:	11

BASEMENT CAR PARKING - TOTALS

B-04	140
B-03	153
B-02	150
B-01	11
BUILDING CAR PARK TOTALS:	454

CAR PARKING SCHEDULE - BY TYPE

ACCESSIBLE	21
CARWASH	1
CASUAL	8
FACILITY MGMT	2
REGULAR	397
SMALL CAR	4
TANDEM	21
TOTAL:	454

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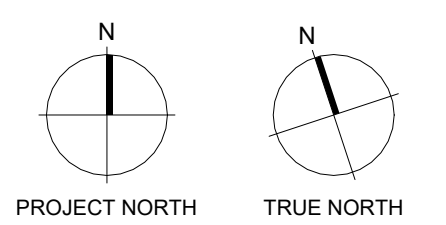
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Drawing Title

GENERAL ARRANGEMENT - FLOOR PLAN - BASEMENT 01

Drawing Status

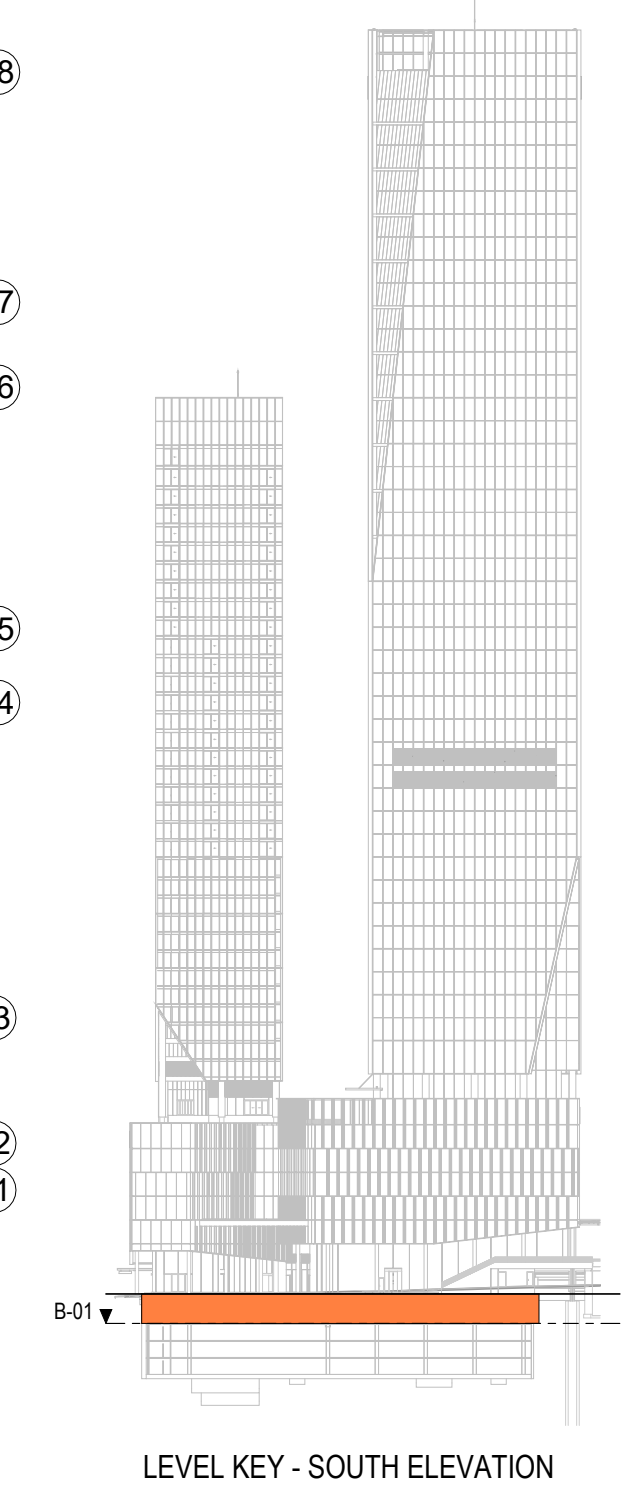
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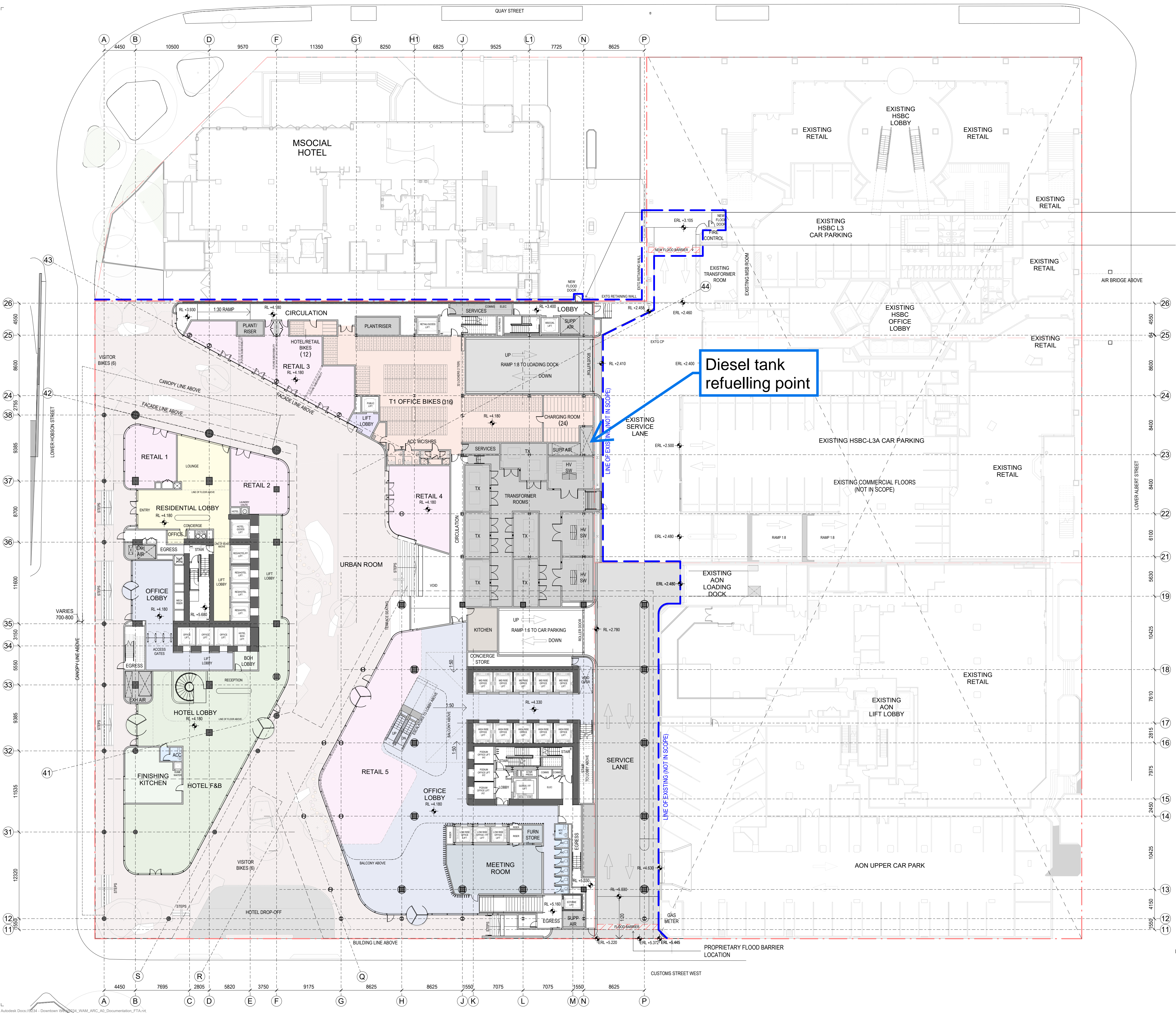
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Checked WAM

Drawing No FTA-10-099
Revision C

WARREN AND MAHONEY





SPACE LEGEND - BASEMENT/PODIUM

- BACK OF HOUSE
- CAR PARK
- END OF TRIP FACILITIES
- HOTEL BOH
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- TOILET FACILITIES

OFFICE AND RETAIL FACILITIES

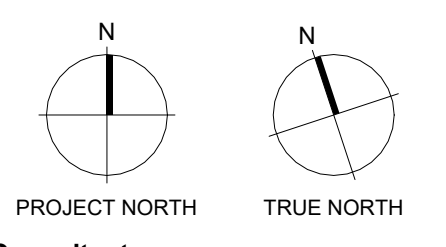
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OFFICE BIKE TOTALS:	316

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Revisions

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 - FINAL PLACEMENT AND HEIGHT OF LIFT OVERINGS - TO BE DEVELOPED/ CONFIRMED.
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 - CHANGES REQUIRED TO EXISTING BUILDING STRUCTURE TO SUIT THE FINAL DESIGN ARE INDICATIVE - TO BE DEVELOPED/ CONFIRMED.



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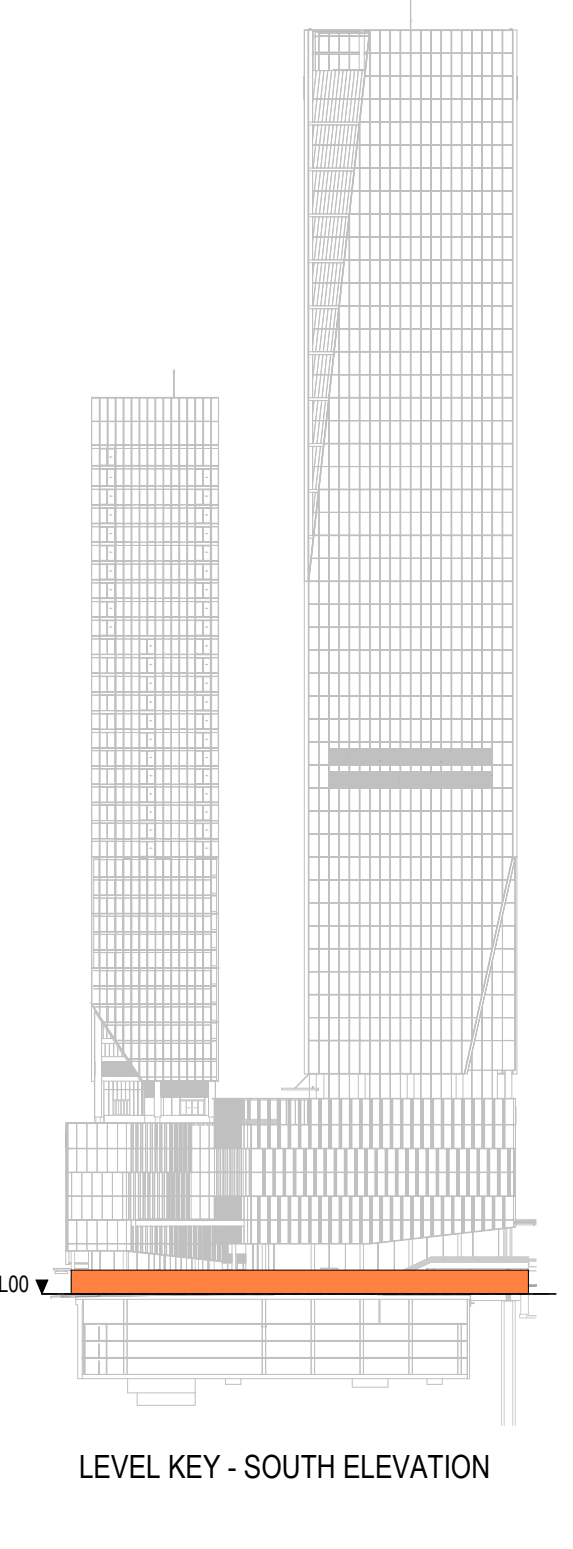
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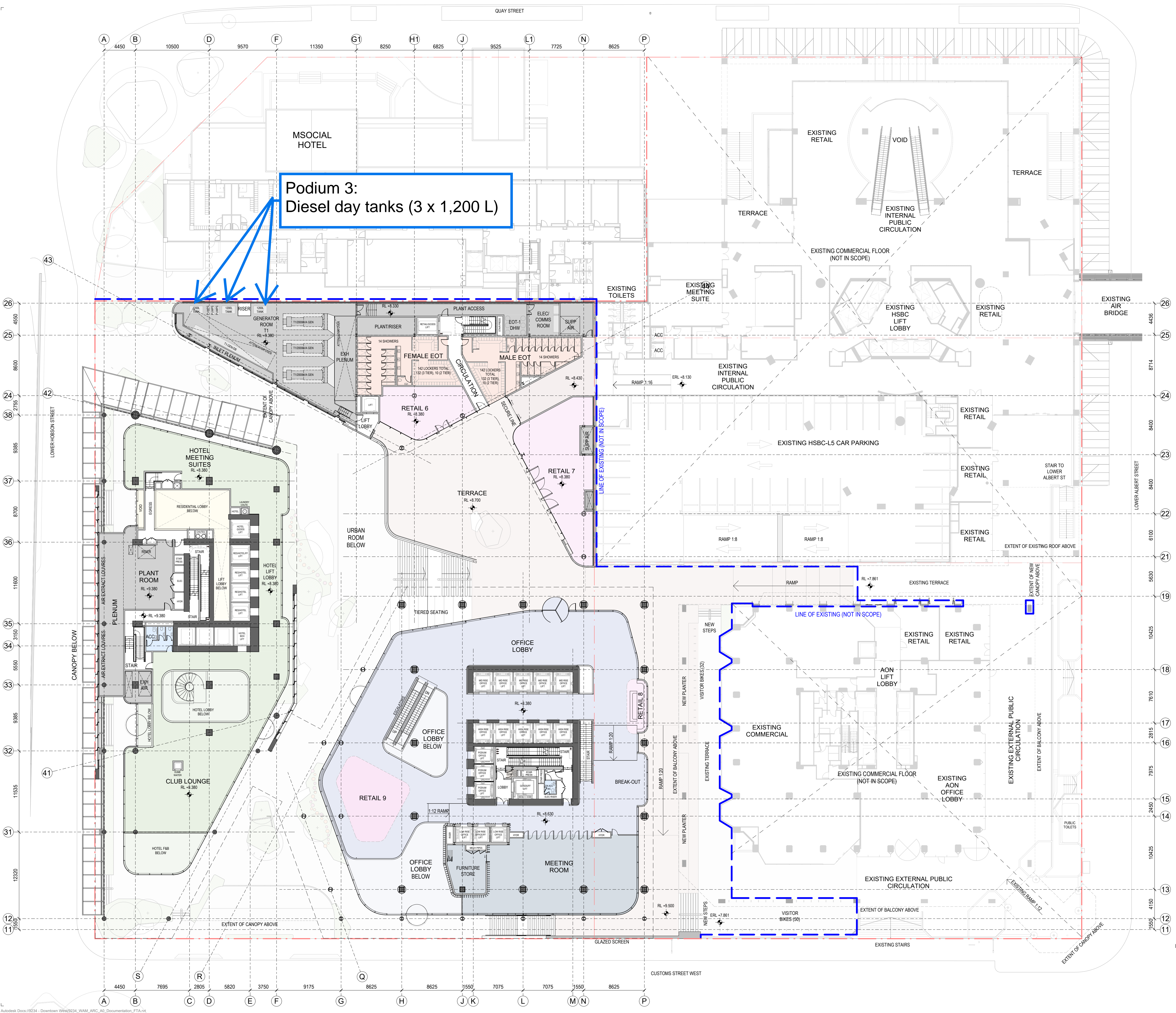
FTA ISSUE

Drawing Details

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Date 03/10/25
Job No 9234
Drawn WAM
Checked WAM

Drawing No FTA-10-100
Revision C





**Podium 3:
Diesel day tanks (3 x 1,200 L)**

SPACE LEGEND - BASEMENT/PODIUM

[Symbol]	BACK OF HOUSE
[Symbol]	CAR PARK
[Symbol]	END OF TRIP FACILITIES
[Symbol]	HOTEL BOH
[Symbol]	HOTEL LOBBY, AMENITY & F&B
[Symbol]	OFFICE & MEETING SUITES
[Symbol]	OFFICE LOBBY
[Symbol]	PLANT
[Symbol]	PUBLIC SPACE
[Symbol]	RESIDENTIAL LOBBY & AMENITY
[Symbol]	RETAIL - FOOD & BEVERAGE
[Symbol]	TOILET FACILITIES

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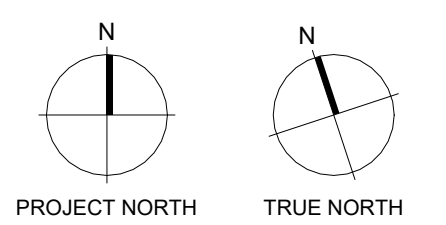
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Drawing Title

**GENERAL
ARRANGEMENT -
FLOOR PLAN -
LEVEL 01**

Drawing Status

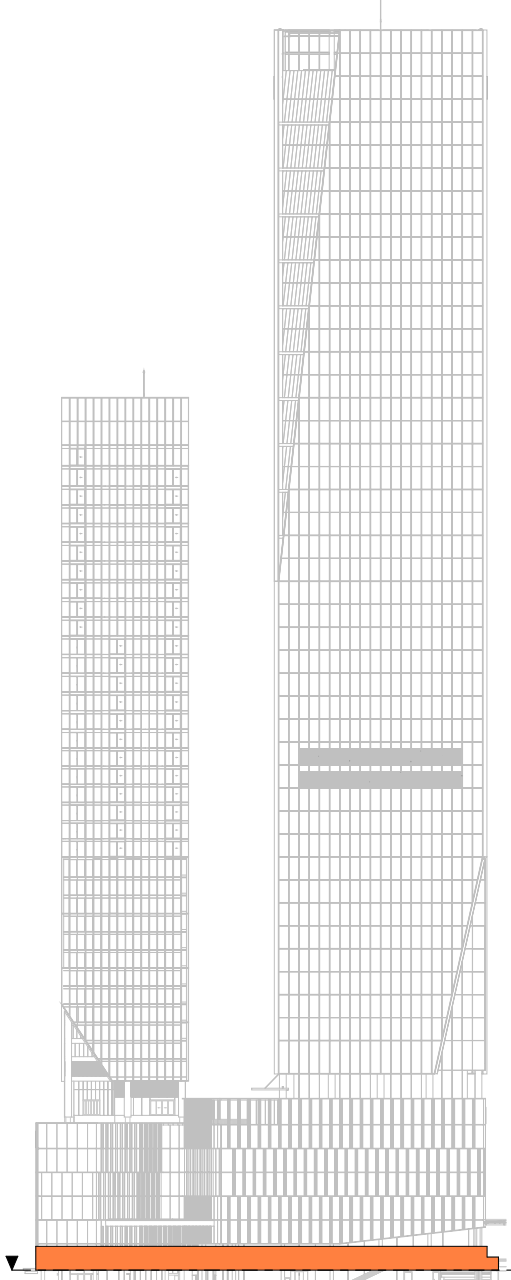
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Checked	WAM

Drawing No
FTA-10-101

Revision
C



LEVEL KEY - SOUTH ELEVATION