

21 May 2026
Job No: 1016043.3000

Precinct Downtown Development Limited
C/- RCP

Attention: Bianca Hurrell

Dear Bianca

Downtown Carpark Site Development Fast-track Approvals Act Application Response to s53 Comments Regarding Air Quality

This document describes a response prepared by Tonkin & Taylor Ltd (T+T) on behalf of Precinct Properties New Zealand Limited ('**Precinct**')¹ to comments relating to air quality effects submitted by Auckland Council and adjacent parties to the expert panel appointed to make a decision on Precinct's application for the Downtown Carpark Redevelopment ('the application') under the Fast-track Approvals Act 2024.

T+T prepared the following documents lodged with the application:

- "Downtown Carpark Site Development - Air Quality Assessment", November 2025, Appendix 25 to the Substantive Application ('**AQA**').
- "Downtown Carpark Site Development – Dust Management Plan", November 2025, Appendix A to the AQA ('**DMP**').

The comments and responses are set out below.

Response to Auckland Council comments

Comments

Comments on air quality effects and associated management measures are set out on behalf of Auckland Council in the *Technical Specialist Memo – Air quality* submitted with its comments '**Council Air Memo**'.

The Council Air Memo acknowledges that *Conditions 5 -20, 35 -37, 99 -104, 146, and 152 collectively provide an appropriate and effective framework for the management and mitigation of potential adverse air quality effects* associated with the development. However, the Council Air Memo also notes that *due to the very close proximity of high -sensitivity receptors (≤10-30 m), the frequency of winds capable of transporting emissions toward these receivers, the classification of demolition as a high dust -risk activity*, this framework should be strengthened with an additional requirement for *real*

¹ In accordance with our engagement with Precinct Downtown Development Limited on behalf of Precinct Properties New Zealand Limited, dated 4/2/2023 and subsequent variations.

-time continuous PM₁₀/TSP monitoring during structural demolition and basement excavation activities.

The Council Air Memo therefore recommends the imposition of the following additional consent conditions:

During all structural demolition and basement excavation activities, the consent holder must employ a suitably qualified and experienced person to install and ensure the operation of real -time continuous particulate monitoring (PM₁₀ and/or TSP) at site boundary locations proximate to the most sensitive receptors, including at least:

(a) one monitor on the northern boundary adjacent to the M Social Hotel;

(b) one monitor on the eastern boundary adjacent to the HSBC/Aon podium ventilation intakes;

and

(c) one upwind/background monitor, with the location determined based on prevailing wind conditions.

Prior to installation of the real -time continuous monitoring and prior to any demolition works commencing the Consent Holder must submit for certification by the council the locations of monitoring as required by (a) -(c) above and any other monitoring locations determined necessary.

The monitoring system must:

- record 1-minute and 15 -minute average particulate concentrations;*
- issue automatic alerts when the pre-defined trigger levels in the Dust Trigger Action Response Plan (DTARP) are exceeded;*
- be integrated with the DTARP to ensure appropriate investigation, mitigation, or stop-work actions; and*
- operate continuously during all active dust generating works, including demolition, excavation, stockpile handling, and truck load -out.*

The Consent Holder must ensure monitoring instruments are located in accordance with the certified locations and maintained in good working order, including through daily functionality checks and retention of all monitoring data for a minimum of 12 months.

Monitoring data must be made available to the council upon request, within 5 working days.

The Council Air Memo has also recommended minor changes to conditions 36, 104 and 146, which are detailed along with our response in Table 1 below.

Response

Although the Kindercare Childcare Centre at AON House will not be occupied during demolition and construction (refer to legal memorandum), other sensitive activities with potential outdoor exposure to dust are present within the HSBC building/AON house podium levels. Therefore, we consider that continuous instrumental PM₁₀/TSP monitoring could provide useful feedback for dust management during demolition (as the key phase of the development for dust generation) to minimise the risk of dust impacts on these activities.

However, we have the following concerns in relation to the conditions proposed in the Council Air memo:

- The purpose of monitoring should be clearly specified in the condition – this should be for the purposes of providing feedback on the efficacy of dust management measures.
- Simultaneous measurement of wind speed and direction would also provide useful information for this purpose and should be included in the condition.
- The monitoring period should be limited to the demolition phase only. Monitoring during basement excavation is not warranted due to the low potential for dust emissions. The geotechnical/groundwater assessment submitted with the application indicates a relatively high groundwater level at the site. As a result, excavated material is likely to be wet or damp, with minimal potential to generate dust during handling or stockpiling.
- Rigid specification of monitoring locations as proposed in clauses (a) to (c) of the condition could frustrate compliance and the condition should allow for flexibility in location selection. The feasibility of monitoring locations will depend on factors such as physical access, available electricity supply and other siting constraints.
- In specific relation to the locations specified in the proposed condition, we do not consider the M Social Hotel clause (b) to be appropriate. The south (rear) façade of the M Social Hotel features minimal openings (doors/openable windows) and the hotel's air conditioning intake appears to be via roof-mounted air handling units, located several storeys above the carpark. Potential for direct dust exposure at this boundary therefore appears to be limited. We note that dust not been raised as a concern in the Millennium & Copthorne Hotels New Zealand Limited comments on the application.
- For the above reasons, a general direction for the monitors to be located at or near the site boundary either downwind of the demolition in the prevailing wind direction (key exposure location), upwind (to determine simultaneous background contributions) or proximate to sensitive receptors beyond the site boundary, would be more appropriate.
- A certification timeframe for monitoring location (e.g. 10 working days from submission of monitoring location details) is recommended. The condition should also allow monitoring locations to be amended after certification (where required by changing circumstances, such as loss of access or relocation of dust sources), via written Council approval, rather than repeating the full certification process.
- Specification of trigger levels for measured PM₁₀/TSP concentrations and exceedance responses to exceedances should be set out within the certified DMP rather than in a separate 'Dust Trigger Action Response Plan' (which is not defined in the conditions).
- The requirement to "operate continuously" does not provide for necessary monitoring outages (such as for calibration and maintenance), which are recognised in MfE ambient air quality monitoring guidance (2009).

We therefore recommend the following alternative conditions in place of the condition proposed in the Council Air Memo to require continuous instrumental PM₁₀/TSP monitoring:

- XXA) During structural demolition of the car park building and attached overpass and footbridge, the consent holder must continuously monitor ambient particulate concentrations and wind conditions at or adjacent to site boundary locations for the purposes of providing continuous feedback on the efficacy of dust management measures. The monitoring must be undertaken in accordance with the following:
- a. monitoring of PM₁₀ or Total Suspended Particulate (TSP) concentrations must be conducted at no less than two separate locations, either downwind or upwind of the demolition works in the prevailing wind direction, or proximate to sensitive receptors beyond the site boundary;

- b. monitoring of wind speed and direction must be conducted at no less than one location;
- c. the monitoring locations described in clauses (a) and (b) must be as certified in accordance with Condition XXB, except with the written approval of the Council;
- d. 1-minute and 15-minute averages of monitored parameters must be recorded, retained for a period of no less than 12 months and provided to the Council in writing within 5 working days of a written request;
- e. electronic alert notifications of measured exceedances of the trigger levels specified in the certified Dust Management Plan (DMP) must be automatically distributed to the relevant persons responsible for managing dust specified in the DMP; and
- f. installation, maintenance and manual calibration of all monitoring instruments must be undertaken by a suitably qualified and experienced person and in accordance with the instrument manufacturer's specifications.

XXB) The consent holder must submit a written identification of the proposed monitoring locations required under clauses (a) and (b) of Condition XXA to Council for certification no less than 10 working days prior to the commencement of demolition activities.

To avoid the need for the separate "Dust Trigger Action Response Plan" recommended in the Council Air Memo, we recommend that the following changes be made to Condition 37 (regarding DMP content):

- e) visual inspection and monitoring procedures, including frequency and kind of monitoring to be undertaken, records to be kept and any system review or reporting required.
- f) methods for continuous monitoring of ambient PM₁₀ or Total Suspended Particulate (TSP) concentrations and wind speed and direction in accordance with Condition XXA, including specification of trigger levels for ambient PM₁₀ or TSP concentrations and procedures for investigating and implementing dust management responses to measured trigger level exceedances.

A response to the changes to conditions 36, 104 and 146 recommended in the Council Air Memo, is provided in Table 1.

Table 1: Response to Council Air Memo recommended modifications to conditions 36, 104 and 146

Condition	Council recommended modifications	Response
36	<i>The objective of the DMP is to manage <u>and monitor</u> dust related effects from <u>demolition</u>, earthworks and construction onsite in accordance with the "Ministry for the Environment Good Practice Guide for Assessing and Managing the Environmental Effects of Dust Emissions" dated November 2016.</i>	No objection

Condition	Council recommended modifications	Response
104	<i>The Council must be notified as soon as practicable in the event of any significant discharge to air, which results in or has the potential to result in a breach of air quality conditions listed in Condition 101 – 103 102 or cause significant adverse effects on the environment. The following information must be supplied:...</i>	No objection.
146	<i>During earthworks all necessary action must be taken to prevent dust generation and sufficient water must be available to dampen exposed soil, and/or other dust suppressing measures must be available to avoid dust formation. The consent holder must ensure that dust management during the excavation works generally complies with the Good Practice Guide for Assessing and Managing Dust (Ministry for the Environment, 2016).</i>	The Ministry for the Environment Good Practice Guide provides guidance on dust management rather strict compliance actions or thresholds. We therefore consider that the change proposed in the Council Air Memo would not be enforceable, and we propose the following alternative modification to Condition 146 for clarity: The consent holder must ensure that dust management during the eExcavation works <u>must be undertaken in general accordance generally</u> complies with the Good Practice Guide for Assessing and Managing Dust (Ministry for the Environment, 2016).

Response to Adjacent Party comments

Quattro RE Limited and individual Sebel unit owners raised concerns in relation to potential dust impacts of the development. No specific conditions were proposed in their comments.

In response, we consider that the conditions proposed by Precinct appropriately address the potential dust effects noted by the parties and we do not recommend any additional updates to the conditions on this basis.

Conclusion

The Council Air Memo proposes consent conditions requiring instrumental air quality monitoring during demolition and earthworks. In response, we have recommended further refinements to these conditions to improve the clarity, effectiveness and practicability of the air quality monitoring requirements. We consider that our recommended conditions will provide further certainty that the discharges to air from the proposed demolition and construction activities can meet the relevant permitted activity standards under the Auckland Unitary Plan.

We have also responded to comments relating to the potential air quality impacts of the development submitted by Quattro RE Limited and various Sebel unit owners. We do not consider that those comments alter the conclusion that, with the proposed dust management and monitoring regime in place, the discharges to air are permitted under the Auckland Unitary Plan.

Applicability

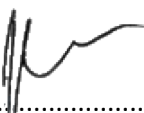
This report has been prepared for the exclusive use of our client Precinct Downtown Development Limited, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

We understand and agree that Precinct Properties New Zealand Limited will submit this report as part of an application under the Fast Track Approvals Act 2024 and that the Expert Panel for the application will use this report for the purpose of assessing that application.

Tonkin & Taylor Ltd

Report prepared by:

Authorised for Tonkin & Taylor Ltd by:



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21-May-26

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