

21 May 2026
Job No: 1016043.2000

Precinct Properties New Zealand Limited
C/- RCP Limited
25 Hargreaves Street
Auckland 1011

Attention: Bianca Hurrell

Dear Bianca

Downtown Carpark Site Development Geotechnical Response to FTAA Submissions

1 Introduction

Precinct Properties New Zealand Limited (Precinct) has engaged Tonkin and Taylor Limited (T+T) to provide geotechnical consultancy services for the proposed Downtown Carpark Site Development ("Project").

We understand that Precinct has submitted a Fast Track Approvals Act 2024 (FTAA) application for consent, including the below reports which outlined analyses undertaken to assess the geotechnical and groundwater effects for the Project:

- "T+T (November 2025). Report to Precinct Properties New Zealand Limited. Downtown Carpark Site Development – Geotechnical and Groundwater Assessment Report. T+T Ref: 1016043.2000-RPT-GT-001."
- "T+T (11 December 2025). Letter report to Precinct Properties New Zealand Limited. Downtown West Development. PC120 Risk Assessment. T+T Ref: 1016043.2000"

Based on the assessment of effects outlined in the above reports, a draft Groundwater and Settlement Monitoring and Contingency Plan (GSMCP) was prepared to outline project controls to address potential geotechnical and groundwater related effects to the works. This is detailed in our report:

- "T+T (November 2025). Report to Precinct Properties New Zealand Limited. Downtown Carpark Site Redevelopment. Groundwater and Settlement Monitoring and Contingency Plan. T+T Ref: 1016043.2000 v5.1."

Following the application, an addendum report was provided to the panel outlining the geotechnical and groundwater related works undertaken following the FTAA submission, which included consultation with Auckland Council Geotechnical & Groundwater specialists. This is detailed in our report:

- "T+T (7 April 2026). Letter Report to Precinct Downtown Development Limited. Downtown West Development. Geotechnical Addendum Report. T+T Ref: 1016043.2000"

2 FTAA Application – s53 Comment Submissions

Section 53 of the Fast-track Approvals Act 2024 provides for a formal comment submission period during which certain parties are invited to provide written comments on the application before the panel makes its decision.

Following our review of the comments received during the comment period, which closed on 7 May 2026, the following comments raised geotechnical and groundwater-related matters that require further consideration.

- Richard Simmons on behalf of Fraser Thomas Ltd – Auckland Council's appointed Groundwater Specialist
- Dave Ouwejan on behalf of Soil and Rock Consultants (S&RC) – Auckland Council's appointed Geotechnical Specialist
- Takeshi Ito on behalf of Millenium & Copthorne Hotels New Zealand Limited (196 – 200 Quay Street) – including their appointed geotechnical specialist CMW Geosciences Ltd (CMW) who have provided comments on the T+T Geotechnical Assessment and proposed conditions.
- Ben Dearlove on behalf of Mornington Trustee Limited (30-36 Fanshawe Street)

The following sections outline the geotechnical and/or groundwater considerations raised by each of the above submissions and provides our responses where relevant.

3 Geotechnical Responses to FTAA Submissions

3.1 Auckland Council Groundwater Specialist – Fraser Thomas Ltd

As outlined in the T+T Addendum Report dated 7 April 2026, T+T engaged with the Auckland Council Groundwater Specialist prior to the formal s53 comments period.

During this early engagement, Fraser Thomas reviewed the application documents referenced above and issued RFI queries (informally, to Precinct) on 5 February 2026. T+T responded to these queries on 20 February 2026, and the responses were subsequently accepted by Fraser Thomas.

In their s53 comments, Fraser Thomas proposed amendments to the draft consent conditions to reflect their feedback. These amendments primarily relate to reducing the alert and alarm thresholds for ground and building settlement monitoring pins surrounding the basement excavation. The amendments are acceptable to T+T.

Based on our review, these changes have been incorporated into the proposed conditions in the formal submission by Fraser Thomas, and no additional amendments have been made.

In response, T+T has prepared an updated Groundwater and Settlement Monitoring & Contingency Plan (GSMCP)¹ for the development to align with the revised conditions.

3.2 Auckland Council Geotechnical Specialist – Soil & Rock Consultants Ltd

As outlined in the T+T Addendum Report dated 7 April 2026, T+T engaged with the Auckland Council Geotechnical Specialist prior to the formal s53 comments period. This engagement included an RFI process (informally between Council and Precinct) relating to the proposed basement retaining wall design, associated deformations, and the potential effects on surrounding buildings and utilities. T+T provided responses and supporting information to these queries, as detailed in the Addendum Report.

¹ T+T (May 2026). Report to Precinct Properties New Zealand Limited. *Downtown Carpark Site Development. Groundwater and Settlement Monitoring and Contingency Plan*. T+T Ref: 1016043.2000 v6.0.

Based on the Application material, including our reports outlined above and the supplementary information provided during the RFI process, it is understood that S&RC consider an adequate level of geotechnical assessment has been completed at this stage of the consenting process.

S&RC also considers that the proposed conditions, together with the GSMCP, are sufficient to avoid or mitigate potential adverse effects on the surrounding environment, subject to the inclusion of additional conditions. These are set out in Appendix A, alongside T+T's comments on the proposed conditions. Overall, the proposed conditions are considered acceptable and consistent with the proposed detailed design and monitoring regime, however, some are noted as already being addressed by the existing conditions.

3.3 Millenium & Copthorne Hotels New Zealand Limited (196 – 200 Quay Street)

Millennium & Copthorne Hotels New Zealand Ltd (MCK) provided detailed s53 comments supported by several engineering specialists, including geotechnical engineers from CMW Geosciences Ltd (CMW).

Prior to the formal comments being submitted, CMW undertook preliminary analyses of the proposed basement excavation and provided a gap analysis letter in advance of its submission for review by T+T. Following this, T+T and CMW participated in a series of teleconferences during which CMW's concerns were discussed and supplementary technical information was provided by T+T to try to narrow/ resolve the issues. T+T has subsequently reviewed the s53 comments prepared by CMW dated 1 May 2026. In that letter, CMW identifies several matters which it considers require further consideration and proposes amendments to the draft resource consent conditions. T+T's responses to CMW's proposed conditions are provided in Appendix B.

Our responses to the requested condition changes have been formed on the following basis:

- The ground model has been developed using an extensive geotechnical database compiled from both site-specific investigations and historical investigations undertaken within the site and the surrounding area. While T+T acknowledges CMW's comments regarding potential variability in the ECBF rockhead and reclamation profile, no significant erosional features or anomalies have been identified within the available dataset that would reasonably warrant further refinement at the current resource consent stage.
- The geotechnical and groundwater assessments and associated modelling completed to date are considered sufficiently robust and appropriate for a resource consent level design assessment. As discussed during the technical meetings with CMW, further detailed finite element modelling (FEM) and sensitivity assessments are proposed as part of the subsequent detailed design and Building Consent phases. These assessments will be informed by additional investigation data as required, refinement of the construction methodology, and sensitivity testing of key geotechnical parameters and ground profiles.
- Detailed construction methodologies will be developed in consultation with the appointed contractor and specialist piling/retaining wall subcontractors following procurement and confirmation of the final construction approach. These methodologies will be developed having regard to the geotechnical assessment and the key construction risks identified to date, including the potential presence of buried obstructions, with the objective of managing both commercial and neighbouring property risks. It is not practicable to finalise detailed construction methodologies until the construction sequencing and methods have been confirmed.
- Notwithstanding the above, the proposed resource consent conditions (as updated in Precinct's response) have been based on T+T's preliminary geotechnical and groundwater assessments, which indicate a negligible risk of damage to neighbouring buildings and utilities,

including M Social Hotel. The proposed monitoring and contingency framework is considered appropriate to manage potential construction effects and provide protection to potentially affected stakeholders during the works. Importantly, the detailed design development, construction methodology, and any subsequent refinement of the works will be required to demonstrate compliance with the performance outcomes, trigger levels, and monitoring requirements established by the consent conditions. As such, this provides an appropriate level of protection to neighbouring properties and supports the conclusion that the risk to M Social Hotel remains negligible.

3.4 Ben Dearlove on behalf of Mornington Trustee Limited

The submission states:

“Mornington Trustee Limited is the owner of the commercial property at 30-36 Fanshawe Street, 30 Fanshawe St: Lot 1 DP 193477; 32 Fanshawe St: Lot 1 DP 193476; and 34-36 Fanshawe St: PT Land on DP 3765 (CT-7A/671) Lot 1 DP 112556, located in the immediate vicinity of the proposed Downtown Carpark Redevelopment.

The building is scheduled as CAT B Historic Heritage (ID 01954) in the Auckland Unitary Plan. The building is founded on shallow foundations below a 2-storey basement.

We seek reassurances that despite being located outside the 20m zone noted in Appendix 33 T&T Draft groundwater settlement monitoring and Contingency plan the effects of dewatering and damming local ground water flows will not detrimentally affect our building.”

T+T Response:

We do not consider the building to be at risk from the effects of dewatering or groundwater mounding, for the following reasons:

- 1 The building is located approximately 70 m from the proposed works. At this distance, our assessment indicates that any settlement effects associated with excavation dewatering will be negligible. Similarly, any groundwater mounding effects behind the retaining wall are expected to be minor and to dissipate over relatively short distances, and are therefore unlikely to extend to the subject property.
- 2 The site is considered likely to be located along the crest of the inferred former coastal cliffs (refer to Figure 2.1 of the T+T Geotechnical Assessment Report). On this basis, and considering the presence of a two-level basement, it is anticipated that the building is founded on ECBF rock. Foundations bearing on ECBF rock are generally not sensitive to groundwater level changes and are unlikely to experience settlement arising from groundwater drawdown in the surrounding soils.

Overall, the proposed works are not expected to result in detrimental effects on the building.

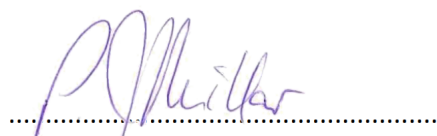
4 Applicability

This report has been prepared for the exclusive use of our client Precinct Properties New Zealand 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.

Tonkin & Taylor Ltd
Environmental and Engineering Consultants

Authorised for Tonkin & Taylor Ltd by:



Peter Milar
Project Director

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Appendix A Proposed Conditions – Auckland Council Geotechnical Specialist

Subject	Proposed Condition	T+T Response
Asset, Services, Basement and Foundation Location	Prior to the lodgement of structural building consents, the consent holder must identify and locate all public and private services, basements and foundations in proximity (beyond the extent of any ground anchors and the zone of influence of any retaining) to the proposed earthworks and anchors. This must inform the detailed design and anchor geometry must be designed to avoid effects on buried services and neighbouring foundations and retaining. <u>Advice Note:</u> It is necessary to assess the effects on basements, foundations and services, regardless of their ownership.	T+T agree to add this condition. <i>We understand that service location using GPR survey has been completed for parts of the basement perimeter. Further work is understood to be scheduled prior to construction to complete this location.</i>
Temporary Works Decommissioning	De-stressing and decommissioning of ground anchors shall be addressed as part of detailed design. Where proposed new services would be constructed at locations potentially affected by the ground anchors, the construction sequencing for those services shall allow for their construction following decommissioning of the anchors.	Details for de-stressing and decommissioning of ground anchors will be included in the construction methodology submitted as part of the works, and is therefore already incorporated in Condition 90.
Detailed Design	Further detailed design (including PLAXIS modelling) shall be completed for the basement retaining walls to confirm, based on the final construction methodology and sequence, including the following matters: • Retaining wall movements and ground settlement: confirmation of predicted wall deflections and associated ground surface settlement for the final excavation staging and support system remain within consented limits. • Temporary/permanent support demands: final sizing/spacing and load demands for temporary anchors and/or top-down props, including waler/capping beam actions. • Groundwater cut-off and seepage effects: confirmation of the final D-wall toe level to achieve the required groundwater cut-off and to manage seepage uplift/piping risks consistent with the AEE assumptions. • Liquefaction effects: refinement of liquefaction assessment inputs and confirmation of liquefaction-related lateral earth pressures/deformation demands on the wall system. • Contingency: sensitivity testing for parameters and construction elements for contingency planning.	T+T agree to add this condition. <i>This is consistent with our proposed detailed design methodology, following confirmation of the final construction methodology and sequence in consultation with the project / construction team.</i>

Subject	Proposed Condition	T+T Response
	• Considerations of neighbouring building surcharge, including basements and deep foundations. The above shall be supported by additional investigation and groundwater testing as necessary. These confirmations will be undertaken consistent with the AEE design basis and the consent conditions, and shall not materially change the effects conclusions.	
Construction Methodology	The consent holder must, prior to the lodgement of structural building consents, provide a detailed construction methodology written or endorsed by a chartered geo-professional for the contractor to undertake the earthworks. This must include the recommendations provided within the Geotechnical and Groundwater Assessment Report by Tonkin + Taylor (reference: 1016043.2000-RPT-GT-001, dated November 2025) and be submitted to the Council for written certification. The construction methodology must include: • Details confirming the sequencing of installation of new underground services to follow the decommissioning of ground anchors where ground anchors are identified by the SQEP to affect new service locations; • The detailed basement design as required by condition, including: – safety requirements for the areas above excavations and excavation time frames; and – temporary propping/weatherproofing and sequencing of boundary works. The consent holder must ensure that the contractor carries out the earthworks and construction in accordance with the certified construction management plan at all times. No earthworks may commence until written certification of the construction methodology by the Council has been provided. <i>Advice Note:</i> This must be provided to ensure boundary stability is maintained throughout the civil works stage of the development. Certification from a suitably qualified engineering professional (SQEP) must be provided to the Council confirming that the earthworks have been completed in accordance with the approved construction methodology as required by Condition [90] within 10 working days following completion. Written certification must be in the form of a geotechnical completion report, or any other form acceptable to the Council. The consent holder must ensure that the excavation and basement retaining wall works are carried out on site in accordance with the further detailed basement designs, the certified GSMCP, and the certified construction methodology.	This is accepted subject to minor changes, refer to updated Condition 90.

Subject	Proposed Condition	T+T Response
Pre-construction condition survey	Prior to the commencement of any earthworks onsite, a detailed pre-construction condition survey must be completed for those properties identified in immediate proximity to the development. The condition survey must be carried out in accordance with the recommendations in the Groundwater and Settlement Monitoring and Contingency Plan (GSMCP) as listed in Condition 1. This must be prepared by a suitably qualified engineering professional and must be submitted for certification by the Council prior to construction works commencing. The consent holder must allow a minimum of ten (10) working days for a response from the owner of any property that a condition survey is required for as set out in the GSMCP. Any existing damage is to be reviewed by the suitably qualified engineering professional responsible for the GSMCP. The assessed condition of the neighbouring properties shall not cause a change to the damage Risk Category assessed by the GSMCP. <u>Advice Note:</u> It is necessary to undertake pre-construction condition survey, regardless of their ownership.	This condition is already specified within the proposed consent conditions (No. 166) – however applicable to “Commencement of Dewatering” rather than “any earthworks onsite”. T+T preference is to maintain existing proposed condition which is consistent with established definitions relating to earthworks and consistent with typical practice. However, in proposed condition 166 we have included the allowance for a minimum of 10 working days for a response from any property owner to our existing conditions from the proposed condition.
Post-construction condition survey	Within six months of completion of the construction works, a post-construction condition survey must be completed for those properties for which a pre-construction condition survey was undertaken. <u>Advice Note:</u> This condition does not apply where written evidence is provided to the Council that the owner of a property has confirmed they do not require another condition survey. The post-construction condition survey must be carried out in accordance with the recommendations in the Groundwater and Settlement Monitoring and Contingency Plan (GSMCP) as listed in Condition 1. This must be prepared by a suitably qualified engineering professional and must be submitted for certification by the Council. The post-construction condition survey report must include a determination of the cause of damage identified (if any) since the pre-construction or previous survey and steps to repair it. The costs of repairing any damage attributed to the development must be paid by the consent holder.	This condition is already specified within the proposed consent conditions (No. 169) – however between six and twelve months of “Completion of Dewatering” rather than within six months of “completion of construction works”. T+T preference is to maintain existing proposed condition which is consistent with established definitions relating to earthworks and consistent with typical practice.

Appendix B CMW Suggested Condition Changes

Consent / Page Ref	CMW Comment	T+T Response
40, 164–165 / p.14, 50–51	The GSMCP shall include additional investigation where existing data is insufficient, and full justification of key geotechnical and groundwater parameters used in design.	The GSMCP is intended to document the monitoring regime required under the draft conditions of consent and is based on the geotechnical and groundwater assessments undertaken as part of the design process. It is not a design document and does not include the design geotechnical or groundwater parameters adopted for the works, nor does it include geotechnical investigation data beyond that required to support the monitoring regime. The proposed amendment therefore extends beyond the intended scope and purpose of the GSMCP, and accordingly it is not considered appropriate to incorporate this wording into the condition.
158 / p.47	The design and construction of the basement retaining walls must be undertaken in accordance with the specifications contained in the detailed design geotechnical reports. Prior to detailed design certification, the consent holder shall undertake additional site-specific geotechnical investigations where required to adequately characterise ground conditions and validate key design parameters, including but not limited to soil and rock stiffness and strength. The detailed design shall incorporate these updated investigation results and include documented justification of all adopted geotechnical parameters, including the basis of derivation and consideration of parameter variability. Where parameters are derived from external datasets or engineering judgement, this shall be clearly identified and supported by appropriate sensitivity analyses. The final design shall demonstrate that retaining wall performance, including predicted deformations and stability, has been assessed using parameters that are representative of site-specific conditions and consider upper-bound scenarios. All such investigations, parameter derivations, and analyses shall be subject to independent peer review and submitted to Council for certification prior to commencement of construction.	We consider that this is sufficiently addressed by the proposed “Detailed Design” condition of consent recommended by Auckland Council’s appointed Geotechnical Specialist, which T+T supports adopting into the proposed conditions of consent. Refer to condition 158. Requirements relating to independent peer review are more appropriately addressed through the Building Consent process, and therefore it is not considered appropriate to include these as resource consent conditions.
Advice Notes 16 / p.62	All requirements currently identified as Advice Notes shall be incorporated into enforceable consent conditions, with “may” replaced by “shall”.	This is a planning matter.

Consent / Page Ref	CMW Comment	T+T Response
173 / p.57	A minimum of three (3) inclinometers shall be installed along the diaphragm wall and monitored continuously until movements stabilise to SQEP and Council satisfaction.	We have reviewed the proposed monitoring plan, and have determined than an additional inclinometer should be included along the northern face adjacent to MSocial. This results in two along the northern boundary, and four total across the basement footprint. However, we consider that weekly manual readings (instead of continuous monitoring) for inclinometers and settlement markers are considered reasonable given that: • The site is secured with a perimeter wall and bracing prior to any excavation • The large amount of geotechnical information available to inform the assessment of effects. • The additional ground information that will be obtained during the installation of the wall (prior to excavation) which will inform risk and be supplemented by sensitivity checks undertaken during detailed design. • The extended excavation timeframe and the expected rate of movements. Construction is progressive and, if significant changes in rates of deformations or responses are detected, an increased frequency will be initiated. We note that the proposed monitoring frequencies have been accepted by AC Specialists as part of their review, and implemented successfully on comparable projects (e.g. Seascape, Commercial Bay).
162–163 / p.49–50	Alert exceedances shall trigger immediate review and mitigation. Alarm exceedances shall trigger immediate notification, contingency actions, and stop-work.	We consider the proposed response framework and notification timeframes to be appropriate. A 24-hour notification period is considered reasonable and consistent with standard practice, while still ensuring timely implementation of contingency actions where required. The proposed alert levels have been established at thresholds where negligible risk to adjacent buildings has been assessed, providing appropriate opportunity for review and response prior to any significant effects occurring.
90 / p.27	A detailed construction methodology shall be developed at detailed design stage, including excavation sequencing, temporary works,	This is already addressed by the existing condition 90 (which has been updated).

Consent / Page Ref	CMW Comment	T+T Response
	predicted deformations, and mitigation measures, and submitted for Council certification.	
90 / p.27	The construction methodology shall be independently peer reviewed and verified against deformation predictions and monitoring requirements prior to commencement of works.	Requirement for peer review of the construction methodology is considered a matter for the Building Consent process and is therefore not considered appropriate to include as a resource consent condition. In addition, we consider that these concerns would also be addressed by Condition 87A (proposed by Council relating to Asset, Services, Basement and Foundation Location).
90 / p.27	The contractor's methodology, once developed or refined, shall be submitted with sufficient lead time for review and acceptance prior to implementation.	This is already addressed by the existing condition: <u>"The consent holder must, two weeks prior to the lodgement of structural building consents, provide...to the Council for written certification. ..No earthworks may commence until written certification of the construction methodology by the Council has been provided."</u>
40(a-f) / p.14	Monitoring shall include continuous automated groundwater monitoring and stage-dependent monitoring frequencies during diaphragm wall construction, excavation and dewatering.	For the reasons outlined above, continuous automated monitoring is not considered necessary or proportionate to the level of anticipated risk.
40(a-f) / p.14	Monitoring of groundwater shall be undertaken continuously using automated (real-time) systems, including both shallow (tidally influenced) and deeper ECBF groundwater systems.	As above. Groundwater monitoring is proposed both within shallow reclamation fill and ECBF rock at depth.
40, 164–165 / p.14, 50–51	A calibrated, site-specific groundwater model supported by additional testing shall be provided to assess drawdown, mounding, and uplift effects.	A site-specific groundwater assessment and modelling has been undertaken as part of the Geotechnical Assessment Report prepared for the FTAA application and has been reviewed and endorsed by Auckland Council's appointed Groundwater Specialist. The proposed basement excavation will be supported by diaphragm walls embedded into the ECBF rock below excavation level, which is considered to represent the most effective groundwater cut-off methodology currently available within the New Zealand market. This approach has been successfully implemented on numerous projects of a comparable scale within the Auckland downtown area.

Consent / Page Ref	CMW Comment	T+T Response
90 / p.27	The detailed design and construction methodology shall explicitly account for potential buried obstructions, including their influence on sequencing, wall alignment, and performance.	Potential buried obstructions have been identified as a key risk within the Geotechnical Assessment Report and will be addressed through the detailed construction methodology. This is also in part addressed by new condition 87A. The basement wall alignment has also been specifically configured to isolate the proposed works from the existing DTC piles as far as practicable.
90 / p.27	The contractor's methodology shall be submitted with sufficient lead time for independent review to confirm risks associated with obstructions are appropriately managed.	Already addressed in the conditions as outlined above.
40(d) / p.14	Monitoring frequency shall be stage-dependent, continuous during high-risk stages, and only reduced where stability is demonstrated to the satisfaction of a SQEP and Council.	The monitoring frequency is already stage dependent, as outlined in the draft GSMCP and draft conditions (Schedules C to E). Requirement for continuous monitoring is not considered appropriate as already addressed.
40(d) / p.14	Monitoring frequency shall be proactively adjusted based on risk and not solely in response to trigger exceedances.	The draft conditions already provide for review of monitoring results and implementation of increased monitoring frequencies through the Alert and Alarm trigger response framework. The proposed Alert and Alarm levels have been conservatively set at thresholds where negligible risk to adjacent structures is anticipated, providing appropriate opportunity to review and respond well before any significant effects occur. Accordingly, where monitoring results remain below these thresholds and are consistent with predicted performance, there would generally be no technical basis requiring increased monitoring frequency.
41 / p.14–15	Building-specific assessments shall define acceptable movement limits, monitoring requirements, and mitigation measures for each structure, including M Social Hotel.	The proposed conditions already require detailed pre-dewatering condition surveys to be undertaken by suitably qualified specialists, including assessment of building condition, foundation type, susceptibility to movement, appropriateness of monitoring locations and frequencies, and review of the proposed Alert and Alarm trigger levels to confirm that settlement below the Alarm Level would not result in damage.

Consent / Page Ref	CMW Comment	T+T Response
40(a-f), 176 / p.14, 58	All monitoring data shall be made available to Council and affected stakeholders, including near real-time access, and regular summary reports.	We do not consider near real-time public access to monitoring data to be necessary or appropriate. Monitoring results will be reviewed and managed by the project SQEPs in accordance with the consent conditions and associated response framework. Two-monthly monitoring reports will be publicly available and therefore accessible to affected stakeholders, while any exceedances of the relevant trigger levels will be managed and notified in accordance with the consent conditions. There is also an established process proposed through the CGL conditions to address the provision of information to CGL members (conditions 7 and 8).
173 / p.57	Monitoring shall include continuous monitoring using automated (real-time) systems during diaphragm wall construction, excavation and dewatering.	Already addressed above
175 / p.58	Immediate notification to Council and all affected stakeholders (including M Social Hotel) upon detection of exceedance or incident.	Agree to amend condition to “immediately as far as practice but within two working days” of detection
106 / p.30	Where access to adjacent properties is not available, conservative thresholds and supplementary monitoring shall be implemented.	This is considered to be addressed by the existing condition, and the proposed Alert & Alarm levels are already set at conservative thresholds. Accordingly, no change to the condition is proposed.