188 Beaumont Street Fast-track

Auckland Council Specialist Memo

Annexure 8:

Contamination & Hazardous Facilities Risk

Ruben Naidoo

13 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 – Contamination & Hazardous Facilities Risk

To:	Lewis So– Lead Planner Russell Butchers – Principal Project Lead
From:	Ruben Naidoo
Qualifications & Relevant Experience:	I have a qualification of: Bachelor of Technology: Environmental Health and have 19 years of experience in contaminated land and hazardous substances management. I am a full member of the New Zealand Institute of Environmental Health (NZIEH). I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications and have appeared as an expert witness before consent authorities on multiple occasions.
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:	RNaidoo
Date:	13 July 2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Fast Track Approval Substantive Application- 188 Beaumont Street, Auckland Central, B&A, 9 April 2025(AEE).
- Detailed site Investigation- 188 Beaumont Street, Wynyard Quarter, WWLA, 20 March 2026(DSI).
- Site Management Plan- 188 Beaumont Street, Wynyard Quarter, WWLA, 20 March 2026 (SMP).
- 188 Beaumont Street – Conditions of Consent, 26 March 2026.
- Hazardous Facilities Risk-Wynyard Quarter Precinct, - 188 Beaumont Street, Wynyard Quarter, T&T, February 2026. (HFR)
- Application Drawings, in respect of the provisions of the *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations*, Ministry for the Environment, 2021 (NES:CS),Chapter E30 of the Auckland Unitary Plan (Operative in Part) (AUP(OP), and NZ Guidelines for Assessing and Managing Asbestos in Soils (November 2017).

4.0 Specialist Assessment

4.1 Proposal

The proposed development comprises a residential-led mixed use building with the ground floor comprising retail spaces and car parking with apartments on the floors above, on a site known to be contaminated as a result of its historical use as part of the former Mobil Oil Auckland Special Products Terminal, a bulk petrochemical storage facility that operated between the 1920s and early 2000s.

The site will be entirely covered with new buildings, pavements or raised landscaped areas. There will be no exposed soil or potential for users of the site to contact soil (other than imported growing media) when the site has been developed.

The ground floor of the development will comprise retail spaces around its street and harbourside frontages. The central portion of the ground floor will comprise car parking, lobbies and supporting infrastructure (loading areas, mechanical and electrical services areas etc.). Residential activities will only occur on the first floor and levels above.

The ground floor slab is proposed to be suspended above existing ground level. At the time of preparing this assessment it had not been confirmed whether a void would be retained beneath the suspended floor slab or this area backfilled.
Soil disturbance /excavations proposed include:

- To remove obstructions for piling;
- To construct building cores (lift pits etc.) to approximately 4 m below ground level (mbgl);
- To install ground beams beneath parts, noting that suspending the floor slab will eliminate the need to excavate significantly below existing grade over large parts of the site; and
- To install some deeper service connections.

4.2.1 Contamination Assessment

The DSI assessment report is primarily derived from an historical Tonkin + Taylor PSI/DSI report which was undertaken in 2018 to assess the site conditions in relation to a resource consent for the redevelopment and extension of the existing Orams marine village and servicing facilities In the applicant's consultants view, this assessment remains relevant for the proposed development.

HAIL activities primarily include bulk fuel and petroleum chemicals storage and potential inclusion of contaminants in historical fill including metals, hydrocarbons and solvents.

Historical and current soil sampling and analysis are summarized below:

- Metal contaminants occasionally exceed the relevant standards for protection of environmental receptors but comply with the criteria for protection of human health under commercial / industrial land use.

- Owing to the previous identification of per- and polyfluoroalkyl substances (PFAS) in groundwater, three soil samples were analysed for the presence of these compounds. One sample contained low concentrations of perfluorooctane sulfonic acid (PFOS) and perfluorohexane sulfonic acid (PFHxS), that comply with the criteria for protection of human health under commercial/ industrial land use; however, have implications for disposal of PFAS impacted surplus spoil and discharges of surface and groundwater from the site.

- Consistent with soil results dissolved hydrocarbons are present in groundwater samples collected across the site. However, monitoring conducted by WWLA since completion of the Orams Marine redevelopment works indicates that concentrations have reduced, at least at the downgradient boundaries of the site

- As separate phase hydrocarbons (SPH) have previously been encountered at monitoring locations near the southern boundary of the site, the potential to encounter localised areas of SPH within the site cannot be excluded. The potential health effects associated with these materials can be mitigated by appropriate monitoring,

- Sampling has identified the presence of petroleum hydrocarbon related compounds and chlorinated solvents in soil vapour beneath the site. However, concentrations generally comply with the relevant criteria for the protection of human health under both commercial / industrial and residential land use.
- The exception being 1.1.2-Trichloroethane (1.1.2-TCA), which is present at concentrations exceeding all land use criteria by approximately 5-fold at one sampling location.

- However, this level of attenuation is expected to be achieved for a new building with a suspended floor slab in combination with residences not being developed on the ground floor.

4.2.2 Further Investigation

- It is noted that soil vapour concentrations locally exceed default exposure standards, while a low residual risk is anticipated under the proposed development, the applicant is currently undertaking further testing to clarify this risk.
- Further vapor monitoring is expected to confirm the need for vapour mitigation (if required) and will inform an updated vapour risk assessment to be provided to Council for approval.
- Further testing to be undertaken prior to works commencing to inform PFAS concentrations in surplus spoil that will be generated during earthworks

To support further investigations and monitoring, excavations at depth, the presence of PFAS in soil and off-site disposal proposals, surface and groundwater discharges and vapor intrusion; a site management plan has been provided to address these issues and provide mitigation measures in the final design of the proposal.

4.2.3 Site Management Plan (SMP)

The SMP addresses the consideration for pre works requirements including:

- Undertaking additional testing of soils for PFAS once foundation designs and site levels are finalised as PFAS impacted material may not be accepted for disposal at landfill.
- shall prepare a vapour risk assessment, which confirms the required vapour mitigation measures (if any), for approval by Council, prior to construction commencing.
- Water management and treatment measures must be established and provided to Council for approval.

Furthermore, the SMP outlines procedures for contractors regarding soil management, removal, health and safety and response to unexpected contamination encounters, and post works requirements and reporting.
An updated SMP will be required after the abovementioned pre works requirements being completed

NESCS
The proposed earthworks (soil disturbance), and subdivision and changing use associated with earthworks and construction of the new building, will require consent as a Restricted Discretionary Activity under Regulation 10 of the NESCS because contaminants are present above the applicable standards for the protection of human health and the site is in requirement of remediation.

AUP E30 Contaminated Land
Contaminants exceed the permitted activity discharge criteria and SPH is expected to be present at the site. As proposed earthworks will exceed 200 m_3 and take longer than 2 months, the relevant permitted activity rules of Section E30 of the AUP cannot be met.
Consent will therefore be required to authorise short-term discharges during the works. It is considered that the requirements of Rule E30.6.2.1 can be met and consent can therefore be granted on a Controlled Activity basis.

4.3 Hazardous Facility Risk

The site is located south of Silo Park, on the corner of Beaumont Street and Jellicoe Street. There is only one hazardous facility remaining in the Wynyard Precinct, the Sanford fish processing facility. The closest boundary is approximately 120 m from the Sanford fish processing facility on Madden Street. This is a hazardous facility due to its use of anhydrous ammonia as a refrigerant gas.
An accidental ammonia gas release therefore presents a hazard to the general public in the event of an accidental release.

The risk review has been undertaken in accordance with the requirements within Chapter I214 of the Auckland Unitary Plan Operative in Part (AUP) Wynyard Precinct provisions, with reference to the quantitative risk assessments prepared for the Wynyard Precinct, and the acceptable risk levels defined in the *Hazardous Industry Planning Advisory Paper No 4 Risk Criteria for Land Use Safety Planning* (New South Wales' Department of Planning, 2011) (HIPAP4) guidance.

The QRA presents the risk contours for the injury and fatality risks associated with the Sanford site. These include the criteria for acceptable risk that apply to residential developments such as the subject site.

The risk assessment concluded that site is substantially outside of the acceptable individual fatality contour, indicating that the fatality risk to occupants of the development is very low; and as such the residential activities proposed at the site are not subject to any unacceptable levels of risk from ammonia use at the Sandford fish processing facility, therefore no mitigation is recommended or required.

The site would be most likely to require evacuation if the wind is blowing from the direction of Sanford (southeast) following an accidental release of ammonia.
In an event that required community evacuation, fire and emergency services would notify and coordinate evacuation in the wider area, and in this regard, Special Information Requirement I214.9 (7)(a) requires an emergency response and evacuation plan for sensitive activities in the Wynyard Precinct.
The applicant has provided a draft Ammonia Emergency Response 7 Evacuation plan accordingly.

5.0 Recommendation

- I am in support of the application and the proposal to undertake further site investigation and vapour risk assessment, which will confirm the required vapour mitigation measures (if any), for approval by Council, prior to construction commencing.

- I concur with the applicant that the residential activities proposed at the site are not subject to any unacceptable levels of risk from ammonia use at the Sandford fish processing facility, therefore no mitigation is recommended or required.
  The provision of an Ammonia Response & Evacuation plan would suffice.

3.0 Proposed Conditions

I consider all conditions relating to contamination as detailed by the applicant in the document titled- 188 Beaumont Street - CONDITIONS OF CONSENT (26 March 2026) to be accepted and adopted, viz.,

PART B: Contaminated Land Discharge Permit DIS [xxx] and Land Use Consent (NESCS) LUC [xxxx]

Conditions applicable to both NES and the AUP E30

Conditions 1-14.

Condition 76 relating to Emergency & Evacuation Plan

Emergency and Evacuation Plan

Following construction of the project and in the event of an ammonia related hazardous event within the Wynyard Precinct, the Consent Holder must implement the 'Draft Ammonia Emergency Response and Evacuation Plan' referenced in Condition 1 prepared by Tonkin + Taylor and dated February 2026 for the risk sensitive activities (i.e. dwellings) for the duration of the activity.