

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:

Downtown Carpark Site Development

Fast-Track application number:

FTAA-2512-1158 (EPA reference)

BUN60460864, LUC60460865, DIS60460866 and WAT60460867
(Council reference)

2.0 Technical Specialist Memo – Environmental Monitoring

To:

Sarah Wilson – Lead Planner & Adonica Giborees - PPL

From:

Yashika Joshi, Senior Environmental Monitoring Officer – Central

Qualifications
& Relevant
Experience:

I hold the qualification of: Bachelors of Commerce from the University of Auckland, majoring in commercial law, and have over four years of experience in the regulatory sector. I lead and support the monitoring of consented activities, involving large scale earthworks, stormwater, wastewater and coastal urban development.

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:

06.05.2026

3.0 Executive Summary / Principal Issues

Respective Consent Types: It is recommended that conditions are broken down into respective consents for efficient monitoring and to ensure pre-start requirements for each consent can be met. For example: specific conditions for LUC, specific conditions for WAT, conditions that apply to all consents.

Grouping of Conditions by Phase: It is recommended that conditions be grouped in chronological order, starting with Pre-Start Conditions, followed by During Construction, and then Post-Construction requirements. Currently, some pre-start requirements are located under conditions relating to during works phase which may cause confusion and should be reorganised accordingly.

Condition Triggers: Consent triggers should be clear to enable efficient monitoring. Some current triggers are a bit vague.

- Avoid using “prior to any works commencing.” Use e.g. “prior to the start of any earthworks”

Implementation conditions: Recommend aligning the wordings of these conditions so they match. They should also be separated from the “plan” conditions for efficient monitoring.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Appendix 24_Proposed Consent Conditions

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

Condition 5:

- Clarify who from Auckland Council should be invited to the CLG – would it be limited to environmental monitoring to attend or are there other parties that may be interested in attending.

Condition 9:

- Wording suggests only Condition 11 to 20 apply to the Management Plans, missing out the requirement of Condition 10 which requires Management plans to be prepared by SQEP. I recommend adding Condition 10 to be applied to all Managements plan.

Condition 12:

- Recommend removing “as applicable” – not directive especially when its followed by “unless otherwise specifies in the conditions” for document submission.

- Recommend changing from “Prior to Construction” to “Prior to demolition” unless the condition specifies anything differently.

Condition 16:

- Minor error where the condition is referencing #16 when it should be #15.

Condition 19:

- Recommend changing from “must be made available to Council during monitoring inspections” to “must be available on-site at all times” – as the management plans are not only for monitoring inspections but also for the sites to ensure they are undertaking works in accordance with them.

Condition 22:

- Recommend removing reference to other management plans. CTMP, CNVMP, ESCMP, DMP and GSCMCP as the CMP is a standalone management plan on its own while the referenced management plans refer to specific stage/activity.
- “22(f)” recommend be removed – not clear what outcome is being sought here.

Condition 26:

- One of the bullet point says “avoid use of the existing loading zones on Lower Hobson Street and Custom Street West...” This is not direct and can lead to differing understanding of the condition. I recommend removing this or specifying when it can be used.

Condition “Dewatering systems to be chemically treated”

- Recommend incorporating this within the ChTMP – there is existing reference the in ChTMP condition covered in “a)” that says “design details of chemical..... for the site’s dewatering system(s)” – Merging the two condition would keep monitoring streamlined for all ChTMP occurring on site.
- The condition also says it must be treated in accordance with the ChTMP which is a management plan – the implementation of management plan is already covered by condition 18 which requires work to be carried out in accordance with certified plans.

Condition NEW3 and NEW4:

- Recommend these conditions be grouped with the “Management plan” requirements/conditions.

Condition 45:

- Recommend providing evidence that street level planting can occur in the location proposed – Auckland CBD has many underground services that could impact implementation of this condition.

Condition “NEW/Advice Notes” under C45:

- Recommend changing it to a condition otherwise cannot enforce to have the plans reviewed by the Universal Design Specialists.

Condition “Comprehensive Active Surveillance Management Plan”:

- Recommend creating a second condition requiring implement/installing the plan.

Condition 51:

- Recommend aligning with 20 working days requirements – streamlined with other conditions which require submission of a plan.

Condition 71:

- Recommend removing “unless it can be demonstrated to be best practicable option” – is vague and can be argued what this could mean.

Condition 83 and 92:

- They are the same conditions – one of them can be removed.

Condition 84:

- Remove this condition – “minimise” discharge/silt contradicts with requirements of C83 which says “avoid”.

Condition 99:

- Recommend removing “in the opinion of an enforcement office”.

Condition 106:

- Recommend adding a form of “certification” to confirm the Glare requirements set by AUP standards has been achieved.

Condition 141:

- Recommend aligning the timeframe with LUC conditions – 20 working days for management plan.

Condition 142:

- Notification under Earthworks condition says “5 days”. Recommend aligning this with 5 days.

Condition 162:

- Condition 36 (GSCMP) falls under the management plan requirements covering “demolition aspect for surveys” and is required 20 working days prior to “construction” while this condition 162. Requires GSCMP to be provided 20 working days prior to “commencement of dewatering. Recommend removing C36.

7.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

8.0 Recommendation

Environmental Monitoring Unit does not take a position on whether we support or oppose the application.

9.0 Proposed Conditions

Review undertaken for all proposed conditions - Please see specialist assessment above.

10.0 Supporting Documents

N/A