

Fulton Hogan Ltd  
c/- Woods  
PO Box 6752  
Welleseley Street  
Auckland

Attention: Tim James

Dear Tim

## Wainui East: Earthworks 2 Area - Ground Contamination Assessment

### 1 Introduction

Tonkin & Taylor Ltd (T+T) has been commissioned by Fulton Hogan Ltd to carry out a desk study assessment of the potential for historical onsite activities to have resulted in ground contamination in the Earthworks 2 Area of the Wainui East development (refer to Figure.1). This assessment was undertaken in accordance with our proposal dated 7 August 2015 and a further request from Rachelle Hui of Woods (email dated 10 April 2017).

The persons undertaking, managing, reviewing and certifying the investigation are suitably qualified and experienced practitioners as defined in the NES Soil regulations<sup>1</sup>.

### 2 Background

We understand Fulton Hogan intends to apply for resource consent to progress the earthworks in Earthworks 2 Area and is seeking clarification around any potential contamination issues within the proposed development.

T+T has previously completed several assessments of the wider Wainui East development, as follows:

- T+T, September 2015. *Wainui East Tranche 1 - Ground contamination assessment*. Prepared for Fulton Hogan Ltd. T+T ref: 30868.001
- T+T, January 2016. *Wainui East - Stage 1 - Ground contamination assessment*. Prepared for Fulton Hogan Ltd. T+T ref: 30868.001
- T+T, June 2016. *Argent Lane Special Housing Area - Ground contamination assessment*. Prepared for Fulton Hogan Ltd. T+T ref: 30868.001
- T+T, August 2016. *Argent Lane Special Housing Area, Qualifying Development Area- Ground contamination assessment*. Prepared for Fulton Hogan Ltd. T+T ref: 30868.001

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<sup>1</sup> Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.

This letter should be read in conjunction with the previous assessments.

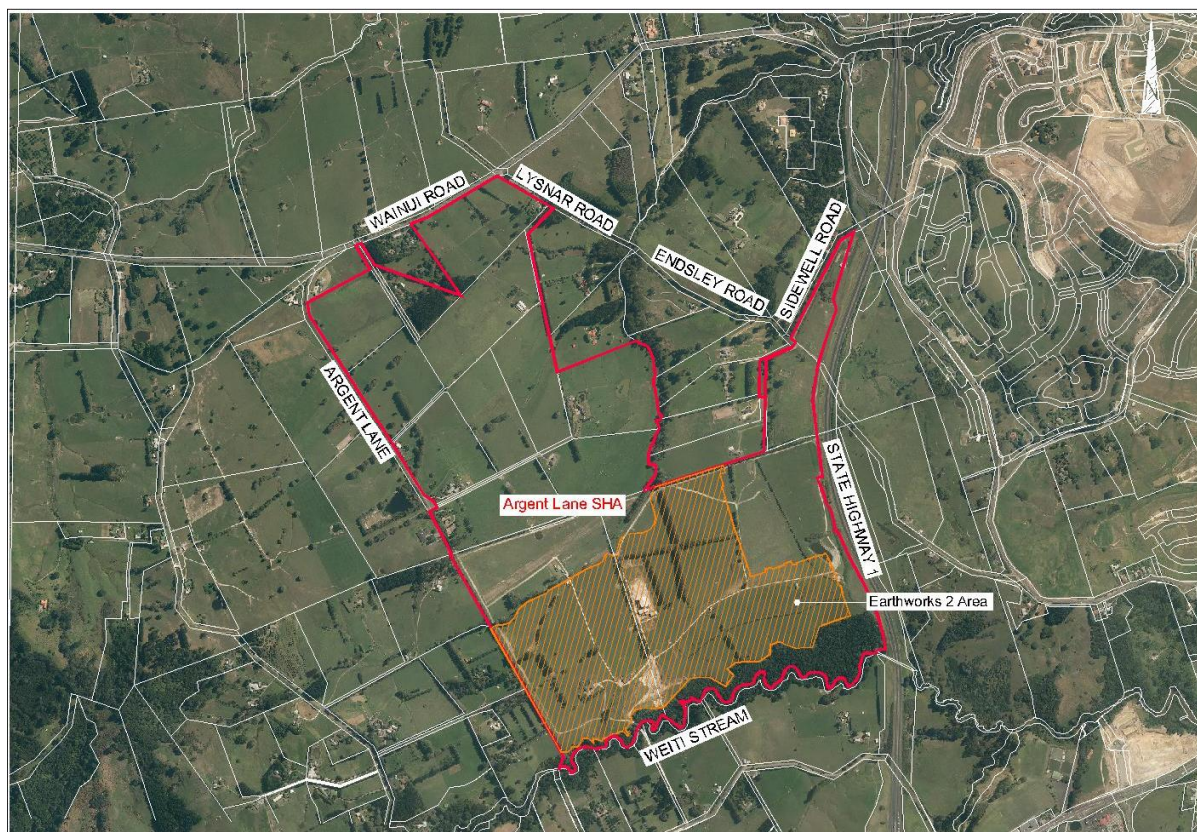


Figure 1: Extent of Wainui East stage 2 earthworks (photograph sourced from Auckland Council GIS viewer).

Under the NES Soil regulations, the need for consent to address ground contamination issues is only triggered when activities included on the Ministry for the Environment's (MfE) Hazardous Activities and Industries List (HAIL) are being, or have been, undertaken on a site. While the provisions of the Auckland Unitary Plan (AUP) is not as specific as the NES Soil regulations, the HAIL is generally also used to determine consenting requirements under those regulations.

### 3 Findings of previous assessments

The previous assessments conducted by T+T included site walkover inspections and interviews with site owners or occupiers where possible. These assessment identified that the site has been used predominately for pastoral farming purposes, with supporting residences and infrastructure. A proposal to develop a lime quarry at the site was considered within the Earthworks 2 Area. However, the proposed quarrying operations did not proceed and the operations base and associated infrastructure developed to support this activity did not appear to have included any uses with significant potential to have resulted in ground contamination.

Only the storage of ACM and burning of rubbish, undertaken in the vicinity of the operations base, appeared to have had potential to have resulted in ground contamination. However, given the recent nature (after mid-2012) and limited extent of these activities contamination it was assessed as being likely to be localised in this immediate area.

Given the size of the subject site and small area of these potentially contaminating activities it was assessed that removal and disposal of the ACM and residual rubbish should be able to be undertaken as a permitted activity under the ground contamination provisions of the NES Soil and AUP, subject to:

- Council being advised prior to the commencement of the work;
- Appropriate stormwater and erosion controls being implemented;
- Any water that is discharged being disposed of without causing more than minor adverse effects on the environment;
- Any contaminated soil or materials removed from the site being disposed of at a facility authorised to accept such materials; and
- The potential ACM may require additional controls and approvals in accordance with the Asbestos Regulations<sup>2</sup>.

In summary, subject to the localised areas of rubbish and potential ACM being removed, the previous assessment concluded that the activities undertaken on the site were not considered to constitute HAILs.

#### 4 Confirmation of current site conditions

T+T confirm that its geotechnical staff have visited the site several times since the initial site walkover of August 2015, and that site activities and features generally correspond to those described in the above assessments, with no new HAIL activities having been observed to date. The only changes to the site relate to ongoing earthworks for other stages of the wider Wainui East development. T+T's geotechnical staff members report no unexpected (potentially contaminated) materials have been encountered during earthworks to date.

#### 5 Conclusion

In conclusion, subject to the localised areas of rubbish and potential ACM being removed, we consider that consent should not be required for ground contamination matters in relation to earthworks in Earthworks 2 Area. However, we recommend that this interpretation be confirmed with Council prior to proceeding with any rezoning or redevelopment of the site.

Yours sincerely



Shane Moore  
Principal Environmental Scientist

26-May-17  
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<sup>2</sup> Health and Safety at Work (Asbestos) Regulations 2016