ENGEO

ENGEO Limited

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Project Number 21253.000.001

Preliminary Environmental Site Investigation

9, 33 & 49 Heights Road, Pukekohe, Auckland

Submitted to: GBar Properties Limited 33 Coles Crescent Papakura Auckland 2110

Contents

1	Introduction			
	1.1	Objectives1		
	1.2	Approach1		
2	Site	Description1		
3 Site History				
	3.1	Auckland Council Site Contamination Enquiry		
	3.2	Auckland Council Property File Review		
	3.3	Historical Aerial Photograph Review4		
4	Site Investigation5			
5	Pote	Potential HAIL Activities7		
6	Cor	Conceptual Site Model7		
7	Summary and Conclusions			
8	Limitations10			
9	References11			



Tables

Table 1:	Site Information
Table 2:	Site Setting
Table 3:	Property File Review
Table 4:	Current Site Conditions
Table 5:	Conceptual Site Model

Appendices

Figure 1:	Site Location Plan
Appendix 1:	Indicative Masterplan
Appendix 2:	Site Contamination Enquiry Response
Appendix 3:	Historical Aerial Photographs
Appendix 4:	Site Photographs

ENGEO Document Control:

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23/06/2023	Revised Indicative Masterplan	NR	JR	JT



1 Introduction

ENGEO Ltd was requested by GBar Properties Limited to undertake a preliminary environmental site investigation (PSI) of the property at 9, 33 & 49 Heights Road, Pukekohe, Auckland (herein referred to as 'the site'). This work has been carried out in accordance with our signed agreement dated 2 December 2022.

The purpose of the assessment was to support a plan change application, with a proposal to redevelop the properties to support a new light industrial complex. We have been provided with the Woods Indicative Masterplan – Scheme Plan (P18-188-UD101; Appendix 1) depicting a conceptual development of new warehouse buildings, landscaped areas, and two proposed stormwater ponds. Based on the plan provided, redevelopment is primarily proposed across the western half of the site.

A site location plan has been provided as appended Figure 1.

1.1 Objectives

The objective of this investigation is to assess the likelihood that a land use from the Ministry for Environment Hazardous Activities or Industries List (HAIL) has occurred on-site, and to assess the need for consent under the Resource Management (*National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health*) Regulations 2011 (the "NES"; NES, 2011) or the contaminated land standards of E30 of the Auckland Unitary Plan – Operative in Part 16 November 2016 (the "AUP; AC, 2016).

1.2 Approach

To meet the objectives, this PSI was undertaken in accordance with MfE CLMG No. 1 (Reporting on Contaminated Sites in New Zealand) by a suitably qualified and experienced practitioner (SQEP).

The following sources of information were reviewed:

- Auckland Council property files and contaminated land enquiry.
- Historical aerial photographs from Retrolens, Auckland Council Geomaps, and Google Earth websites.
- Site walkover to assess the site conditions for visual indicators of contamination.

2 Site Description

Site information and site setting is summarised in Table 1 and Table 2, respectively.



Table 1: Site Information

Item	Description
Legal Description	LOT 1 DP 72373, LOT 1 DP 109824, LOT 2 109824
Current Land Use	Generally used for commercial / industrial purposes, including a tractor dealership and workshop, Totalspan Steel Buildings office, and BMC Engineering. 49 Heights Road is used for residential land use.
Proposed Land Use	Commercial / industrial (light industrial complex)
Site Area	5.35 hectares (ha)
Territorial Authority	Auckland Council

Table 2: Site Setting

Item	DescriptionThe site slopes down from the north, south and west boundaries to a gully. The base of the gully is in the southern third of the site running west from a minimum elevation of around 48 m in the southern third of 49 Heights Road. The gully widens out as it goes further west where is reaches a minimum elevation of around 44 m in the southeast corner of the site.The site is located in a mixed rural residential and commercial area at the northern end of Pukekohe.		
Topography			
Local Setting			
Nearest Surface Water & Use	The Whangapouri Creek runs north to south immediately adjacent to the eastern site boundary (on the other side of Paerata Road).		
Geology (GNS, 2022)	 GNS maps the site as underlain by two separate geological units. These are identified as Undifferentiated Kerikeri Volcanic Group basalt lava of South Auckland Volcanic field, comprising: <i>fine-grained and coarse-grained, porphyritic, olivine basalt, basanite and hawaiite lava flows;</i> and <i>lithic tuff, comprising comminuted pre-volcanic materials with basaltic</i> 		
	fragments, and unconsolidated ash and lapilli deposits.		
Hydrogeology	Unknown. Based on the site topography and the nearby Whangapouri Creek, it is considered likely that groundwater flows to the east.		



3 Site History

ENGEO obtained and reviewed available environmental information relevant to the site, including historical aerial photographs, property files, and a contaminated land enquiry response from Auckland Council. Relevant information from these sources is summarised in this section.

3.1 Auckland Council Site Contamination Enquiry

Auckland Council provided a response to a Site Contamination Enquiry (SCE) on 15 December 2022. A copy of this response is included in Appendix 2. In preparing the response, the former Auckland Regional Council and current databases were searched for closed landfills, bores, air discharge consent, and environmental assessments within 200 meters of the site.

Auckland Council's SCE identified the following activities from the Ministry for the Environment's Hazardous Activities and Industries List (HAIL; MfE, 2011) as potentially occurring on-site:

- HAIL ID A10: Persistent pesticide bulk storage or use including sports turfs, market gardens, orchards, glass houses or spray sheds.
- HAIL ID A17: Storage tanks or drums for fuel, chemicals, or liquid waste.
- HAIL ID D5: Engineering workshops with metal fabrication.
- HAIL ID F5: Motor vehicle workshops.

Several consents relating to the construction and extraction of groundwater from boreholes are recorded, as well as discharge of dairy wastewater to land. Additionally, the SCE indicates the installation of a 10,000L underground storage tank (UST) at 9 Heights Road.

Due to the age of the buildings on-site, Auckland Council has identified the potential for lead and / or asbestos contamination.

3.2 Auckland Council Property File Review

The property file held by Auckland Council was received on 15 December 2022. Relevant findings in relation to our environmental assessment are provided in Table 3 below.

Date	Description		
9 Heights Road			
1972	Les I. Russell Limited was granted approval to erect a factory and depot for the manufacture, preparation, and sale of food, but excluding the processing of raw meats.		



Date	Description			
1999	 Site plan supplied by Airey Consultants Ltd indicates the presence of: An existing fuel tank located on the western side of the tractor center to be removed. A proposed 4 m x 4 m bunded area for storage of soil, a 1 x 750l waste tank and 4 x 550l new oil tanks next to the existing fuel tank. An existing fat settling septic tank to be re-used as an oil separator located to the north-western side of the tractor center. 			
2007	The Tractor Center Limited holds the resource consent (No: 26269) to divert and discharge stormwater at 9 Heights Road. The consent expires on 31 December 2036.			
33 Heights Road				
1985	Proposed subdivision (Lot 2 DP 66575) of the existing orchard owned by Kotuku Gardens Ltd.			
2004	Approval of the land use application for the replacement of the wastewater disposal system (removal of old septic tank and new one installed) next to the existing dwelling on the southern side of the Tractor Centre.			
2017	Construction of new workshop / shed for GBar Properties for the storage of machinery and materials to the far west of the Tractor Centre, along Heights Road.			
49 Heights Road				
1979	Proposed site plan for the construction of a new dwelling and packing shed, with an existing septic tank located to the east of the proposed dwelling.			

3.3 Historical Aerial Photograph Review

Aerial photographs from 1942 to 2022 have been reviewed and are included in Appendix 3 for reference. The aerials were sourced from Auckland Council GeoMaps, Retrolens and Google Earth. Relevant visible features on the site and surrounding area are summarised below.

In 1942, the site comprises primarily grassed fields partitioned into 4-5 paddocks, and close inspection of the photographs suggests sheep are grazing on the land. A dwelling is present in the southeast corner of the site, with a shed present immediately north. Additional structures (likely agricultural sheds) are evident in the northeast portion and southwest portions of the site. The surrounding area appears to be used for rural residential purposes. Paerata Road binds the site to the east, and Heights Road to the north.

No significant changes to the site are observed in the 1961 image, with the exception of the removal of the small buildings in the southwest.



In the 1978 image, the eastern portion of the site has been developed into commercial / industrial land. A warehouse is present in the southeast portion of the site, with minor sheds / tanks north of the warehouse. The dwelling in the southeast (identified in the 1942 image) remains on-site. By 1981, the majority of the site appears in use as horticultural land, with paddocks of crops present across the majority of the site. Two buildings have been constructed in the northwest corner of the site.

By 2001, the site appears to no longer be used for horticultural land use. A shed has been constructed in the center of the site, and a significant increase in vegetation / shelterbelts can be observed. A cemetery is being constructed to the south of the site. By 2006, additional commercial buildings have been constructed in the northeast of the site. The dwelling (first visible in the 1942 image) to the southeast has been removed. The central portion of the site appears to be used for storage of materials (unknown materials but likely associated with the commercial activity being undertaken on-site). By 2010, a hardstand surface has been constructed across the eastern portion of site.

By 2017, additional storage of unknown materials can be observed, specifically along the northern portion of the site. Two additional curved sheds have been constructed in the center of the site, with a rectangular building constructed to the immediate west of these sheds. By 2022 (present day), a large warehouse-like building has been constructed along the northern site boundary. A hardstand surface is present to the west of this building. A third curved shed has been constructed in the center of the site. An increase in stored materials can be observed across the site.

4 Site Investigation

A site walkover was completed by an ENGEO environmental scientist on 25 January 2023. Observations of activities and conditions present at the site are summarised in Table 4 below.

Photographs taken during the site visit are included in Appendix 4.



Table 4: Current Site Conditions

Site Conditions	Comments
Site Description	The site is located on gently sloping land (sloping downwards from west to east) in a mixed rural residential and commercial / industrial area in Pukekohe. The site is currently used for commercial / industrial purposes, containing a tractor dealership and service station, an engineering firm (BMC Engineering), Totalspan Steel Building office, storage sheds, and yard areas containing storage of tractor parts, lawnmowers, small jeeps, tyres, piping, timber and general rubbish. Signage on the BMC engineering building also indicates the presence of "Hardi – The Sprayer". Conversations with site staff identified that this company is an agricultural spray supplier, however no activities or storage of materials associated with this activity were observed.
	A wash station, waste oil bath and a spray room are located on the western side of the tractor centre.
	Multiple above ground petrol / diesel fuelling stations were observed across the site. Hazardous substances included drums of fuel and compressed gases (nitrogen, argon) were located across the site (indoor and outdoor).
	The northern portion of the site is significantly higher in elevation than the rest of the site, with the exception of a raised section in the central southern portion of the site.
	The site at 49 Heights Road is used for residential purposes. The site comprises a single dwelling and a shed, comprising timber, steel and potential asbestos containing materials (PACM) within the soffits. Two stockpiles were observed in the southern portion of 49 Heights Road - one comprising soil, and the other felled vegetation, timber (crates) and plastic. The site slopes heavily downwards from north to south.
Surface Water Appearance	Minor surface water was observed to the west of the tractor warehouse. Surface water appeared to be associated with hosing down of equipment. No staining or sheen was observed on the water.
Current Surrounding Land Use	The site is surrounded by rural residential properties to the north and west. State Highway 22 neighbours the site to the east, and Heights Park Cemetery is present immediately south.
Local Sensitive Environments	No local sensitive environments have been identified.
Visible Signs of Plant Stress	No visible signs of plant stress observed.
Ground Cover	The ground cover is a mix of grassed areas, concrete and gravel hardstand.
Potential for On – Or – Off – Site Migration of Contaminants	Auckland Council GeoMaps indicates the presence of overland flow paths (OVFP) on-site. Soluble contaminants and contaminants absorbed to sediments have the capacity to migrate on / off site via this OVFP, however much of this flow is likely captured by stormwater drains prior to leaving site.



Site Conditions	Comments
Visible Signs of Contamination	Multiple drums have been observed across the site (within warehouses and yard areas), containing engine oils, petrol, lubricants etc. Minor staining has been observed around some of the drums in the yard areas.
Significant Observations	Minor earthworks are underway on-site. Soil from the rear of the tractor warehouse is being excavated and placed to the south of the BMC engineering building to build up a retaining wall. The soil profile appears to comprise a thin layer of topsoil, underlain by an orange clayey silt (indicative of native soils).

5 **Potential HAIL Activities**

Based on the information reviewed as part of this PSI, the following activities listed on the MfE Hazardous Activities and Industries List (HAIL; MfE, 2011) may have occurred at the site.

- HAIL ID A10: Persistent pesticide bulk storage or use including sports turfs, market gardens, orchards, glass houses or spray sheds.
 - The site has been used for historical horticultural purposes across the northern part of the site (1981 image; Appendix 3).
- HAIL ID A17: Storage tanks or drums for fuel, chemicals, or liquid waste.
 - The SCE has indicated the presence of a 10,000L UST at 9 Heights Road, as well as activities associated with a tractor maintenance and repair center.
- HAIL ID D5: Engineering workshops with metal fabrication.
 - An engineering firm is present on-site, as well as the Totalspan Steel Building site.
- HAIL ID F5: Motor vehicle workshops.
 - A tractor maintenance and repair center, and an automotive parts shop have been identified as present on-site.
- HAIL ID I: Any other land that has been subject to the intentional or accidental release of a hazardous substance in sufficient quantity that it could be a risk to human health or the environment.
 - Due to the age of current and former site buildings, there is potential for contamination associated with lead-based paints and / or asbestos.

6 Conceptual Site Model

A conceptual site model (CSM) has been developed for the site to assess the exposure pathways present at the site. A CSM consists of three primary components. For all a contaminant to present a risk to human health or an environmental receptor, all three components are required to be present and connected. The three components of a conceptual site model are:



- Source of contamination.
- An exposure route, where the receptor and contaminants come into contact (e.g., ingestion, inhalation, dermal contact).
- Receptor(s) that may be exposed to the contaminants.

The potential source, pathway receptor linkages at this subject site are provided in Table 5.

Table 5: Conceptual Site Model

Source	Exposure Pathway	Potential Receptor	Acceptable Risk?
Pesticides and other sprays associated with horticultural land use Primary contaminants of	Soil ingestion, inhalation of dust, and / or dermal contact	Site redevelopment workers / future site users	Unknown – the northern half of the site has been used for historical horticultural purposes
concern; heavy metals / metalloids and organochlorine pesticides (OCPs)	Leaching of contaminants	Surrounding environment	Recommend testing of site soil / fill material
Storage of tanks or drums for fuel, or liquid waste Primary contaminants of concern; heavy metals /	Soil ingestion, inhalation of dust, and / or dermal contact	Site redevelopment workers / future site users	Unknown – an underground storage tank (UST) has been identified at 9 Heights Road Recommend testing of site
metalloids and polycyclic aromatic hydrocarbons (PAHs)	Leaching of contaminants	Surrounding environment	soil / fill material
Engineering workshops with metal fabrication Primary contaminants of concern; heavy metals /	Soil ingestion, inhalation of dust, and / or dermal contact	Site redevelopment workers / future site users	Unknown – an engineering firm has been identified on-site Recommend testing of site
metalloids, possible use of solvents or degreasers	Leaching of contaminants	Surrounding environment	soil / fill material
Motor vehicle workshops Primary contaminants of concern; heavy metals / metalloids and PAHs,	Soil ingestion, inhalation of dust, and / or dermal contact	Site redevelopment workers / future site users	Unknown – a tractor dealership and workshop been identified on-site Recommend testing of site
possible use of solvents or degreasers	Leaching of contaminants	Surrounding environment	soil / fill material
Contamination associated with the age of building construction Primary contaminants of concern; lead and asbestos	Soil ingestion, inhalation of dust, and / or dermal contact	Site redevelopment workers / future site users	Unknown – potential asbestos and / or lead contamination from current / former buildings Recommend testing of site soil / fill material



7 Summary and Conclusions

ENGEO was requested by GBar Properties Limited to undertake a PSI of the property at 9, 33 and 49 Heights Road, Pukekohe, Auckland. The purpose of the assessment was to support a plan change application, with a proposal to redevelop the properties to support a new light industrial complex.

Based on the information reviewed as part of this PSI, several activities listed on the MfE's HAIL (MfE, 2011) are considered more likely than not to have occurred on the piece of land. A land use change, soil disturbance and subdivision on sites where an activity included on the HAIL is, has, or is more likely than not to have occurred, requires a consent under the NES (NES, 2011).

A Detailed Site Investigation (DSI) is required in the areas where potential HAIL land uses have been identified to determine whether a controlled or restricted discretionary activity can be obtained, unless the territorial authority issues a discretionary activity consent under the NES.

Based on the current / historical land use, contaminants may be present within shallow soil above regional background levels, meaning that shallow soil excavated from site may require testing / approval from Auckland Council prior to being disposed or reused at another earthworks site.

Is it recommended that a Suitably Qualified and Experienced Practitioner (SQEP) is engaged to undertake a DSI in accordance with the requirements of the NES, and to assess the site against the contaminated land provisions of the AUP. If the redevelopment proposes to dispose of soils off-site, the DSI should also consider assessment of soils for disposal purposes.



8 Limitations

- We have prepared this report in accordance with the brief as provided. This report has been
 prepared for the use of our client, GBar Properties Limited, their professional advisers and the
 relevant Territorial Authorities in relation to the specified project brief described in this report.
 No liability is accepted for the use of any part of the report for any other purpose or by any other
 person or entity.
- ii. The recommendations in this report are based on the ground conditions indicated from published sources, site assessments and subsurface investigations described in this report based on accepted normal methods of site investigations. Only a limited amount of information has been collected to meet the specific financial and technical requirements of the client's brief and this report does not purport to completely describe all the site characteristics and properties. The nature and continuity of the ground between test locations has been inferred using experience and judgement and it should be appreciated that actual conditions could vary from the assumed model.
- iii. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual data provided. They should perform any additional tests as necessary for their own purposes.
- iv. This Limitation should be read in conjunction with the Engineering NZ/ACENZ Standard Terms of Engagement.
- v. This report is not to be reproduced either wholly or in part without our prior written permission.

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned on (09) 972 2205 if you require any further information.

Report prepared by

epates-

Tyler Paterson Environmental Scientist

Report reviewed by

Auch

Jamie Rhodes, CEnvP (SC) Associate Environmental Engineer

Nandhini R Environmental Scientist



9 References

AUP, 2016. Auckland Regional Council. (2016). The Auckland Unitary Plan (Operative in Part) notified 15 November 2016.

MfE, 2011. Ministry for the Environment. (2011). Hazardous Activities and Industries List (HAIL).

NES, 2011. The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations (2011).





FIGURES







APPENDIX 1:

Indicative Masterplan





AREA SCHEDULE SUMMARY

	EXISTING BUILDING 1	EXISTING BUILDING 2	NEW BUILDING 1	NEW BUILDING 2	NEW BUILDING 3	NEW BUILDING 4	NEW BUILDING 5	NEW BUILDING 6	NEW BUILDING 7	NEW BUILDING 8
GFA	2,414m ²	2,666m ²	1,819m ²	1,962m ²	950m ²	1,000m ²	900m ²	1,550m ²	1,500m ²	1,500m ²
PARKING PROVIDED	15	45	20	51	16	30	35	44	35	30

TOTAL STORMWATER POND AREA 2,000m² TOTAL GFA (EXISTING + NEW) 17,643m² TOTAL PARKING PROVIDED 341





SITE PLAN LEGEND

PROPERTY BOUNDARY 0.5m CONTOURS EXISTING RETAINING WALL PROPOSED RETAINING WALL EXISTING WAREHOUSE PROPOSED WAREHOUSE PROPOSED CANOPY & LOADING PROPOSED STORMWATER POND LANDSCAPE AREA SERVICE AREA

RE	VISION DETAILS	BY	DATE
Α	PLAN CHANGE	SW	22/06/2023

SW	9, 33, and 49 HEIGHTS ROAD, PUKEKOHE	
SW		
EW		
EW	WOODS.CO.NZ	
	SW	



GBAR PROPERTIES

9-49 HEIGHTS ROAD PROPOSED PLAN CHANGE



INDICATIVE MASTERPLAN

STATUS	PLAN CHANGE	REV
SCALE	1:1500 @A3	Α
COUNCIL	AUCKLAND COUNCIL	A
DWG NO	P18-188-UD101	



APPENDIX 2:

Site Contamination Enquiry Response





13 December 2022

ENGEO Limited 8 Greydene Place AUCKLAND 0622

Attention: Nandhini R

Dear Nandhini

Site Contamination Enquiry – 9, 33, 49 Heights Road, Pukekohe

This letter is in response to your enquiry requesting available site contamination information within Auckland Council records for the above site. Please note this report does not constitute a site investigation report; such reports are required to be prepared by a (third-party) Suitably Qualified and Experienced Practitioner.

The following details are based on information available to the Contamination, Air & Noise Team in the Resource Consent Department. The details provided may be from former regional council information, as well as property information held by the former district/city councils. For completeness the relevant property file should also be requested to obtain all historical records and reports via 09 3010101 or online at:

https://www.aucklandcouncil.govt.nz/buying-property/order-property-report/Pages/order-property-file.aspx.

1. Hazardous Activities and Industries List (HAIL) Information

This list published by the Ministry for the Environment (MfE) comprises activities and industries that are considered likely to cause land contamination as a result of hazardous substance use, storage, and/or disposal.

Council's records indicate this site has possibly been subject to the following activity that fall within the HAIL:

- HAIL Item (A.10) Persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds.
- HAIL Item (A.17) Storage tanks or drums for fuel, chemicals or liquid waste.
- HAIL Item (D.5) Engineering workshops with metal fabrication.
- HAIL Item (F.5) Motor vehicle workshops.

Council records indicate 33 & 49 Hights Road have been utilised for historical horticulture activities (this can be seen in the below 1981 aerial image), further the potential for contamination associated with storage of materials from a tractor maintenance and repair centre at 33 Heights Road may need to be considered.

Council records indicate in 1975 the installation of 10,000L UST at 9 Heights Road, additionally records indicate the site is utilised for workshop and engineering activities associated with a tractor maintenance and repair centre.

Due to the age of the buildings on site the potential for asbestos and/or lead paint may need to be considered.



2

Please note:

- If you are demolishing any building that may have asbestos containing materials (ACM) in it, you have obligations under the Health and Safety at Work (Asbestos) Regulations 2016 for the management and removal of asbestos, including the need to engage a Competent Asbestos Surveyor to confirm the presence or absence of any ACM.
- Paints used on external parts of properties up until the mid-1970's routinely contained lead, a poison and a persistent environmental pollutant. You are advised to ensure that soils affected by old, peeling or flaking paint are assessed in relation to the proposed use of the property, including high risk use by young children.

2. Consents and Incidents Information (200m radius of the selected site)

The Council database was searched for records of the following activities within approximately 200 metres of the site:

- Pollution Incidents (including air discharges, oil or diesel spills)
- Bores
- Contaminated site and air discharges, and industrial trade process consents
- Closed Landfills
- Air quality permitted activities
- Identified HAIL activities



Figure 1: Selected Consents, Incidents and HAIL activities within approximately 200m of the subject site

Legend:



Relevant details of any pollution incidents and consents and HAIL activities are appended to this letter (Attachment A). Please refer to the column titled 'Property Address' on the spreadsheet to aid in identifying corresponding data on the map.

For any identified HAIL sites, please refer to the tab "HAIL activities" for more information (Column C and D include HAIL activity details where these are available).

Please note:

The HAIL activity hatching in Figure 1 only reflects whether a site has been identified as a HAIL site (both verified and non-verified) by the Council and the type of HAIL associated with the site. This does not confirm whether the site has been formally investigated or the contamination status of the property (e.g. contaminated, remediated etc.). Additionally, due to limitations within Council's records, the specific HAIL activity is not included in the data for all properties. For further information on any of these known HAIL sites, a subsequent site contamination enquiry can be lodged for the specific property (up to 5 adjacent properties can be covered in one request).

While the Auckland Council has carried out the above search using its best practical endeavours, it does not warrant its completeness or accuracy and disclaims any responsibility or liability in respect of the information. If you or any other person wishes to act or to rely on this information, or make any financial commitment based upon it, it is recommended that you seek appropriate technical and/or professional advice.

If you wish to clarify anything in this letter that relates to this site, please contact <u>contaminatedsites@aucklandcouncil.govt.nz</u>. Any follow up requests for information on other sites must go through the online order process.

Should you wish to request any of the files referenced above and/or listed in the attached spreadsheet for viewing, please contact the Auckland Council Call Centre on 301 0101 and note you are requesting former Auckland Regional Council records (the records department requires three working days' notice to ensure the files will be available).

Please note Auckland Council cost recovers officer's time for all site enquiries. As such an invoice for \$128 for the time involved in this enquiry will follow shortly.

Yours Sincerely,

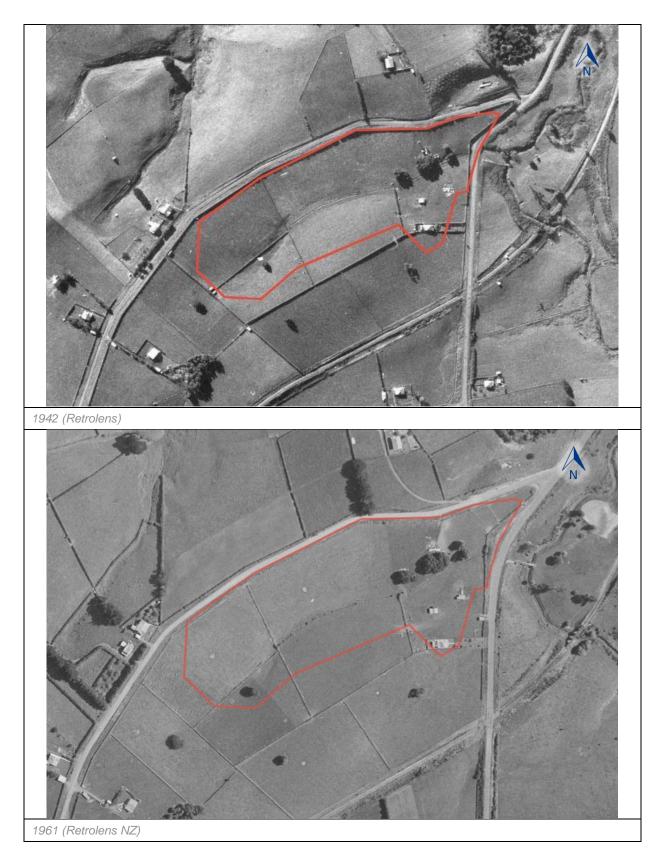
Contamination, Air and Noise Team Specialist Unit | Resource Consents Auckland Council



APPENDIX 3:

Historical Aerial Photographs

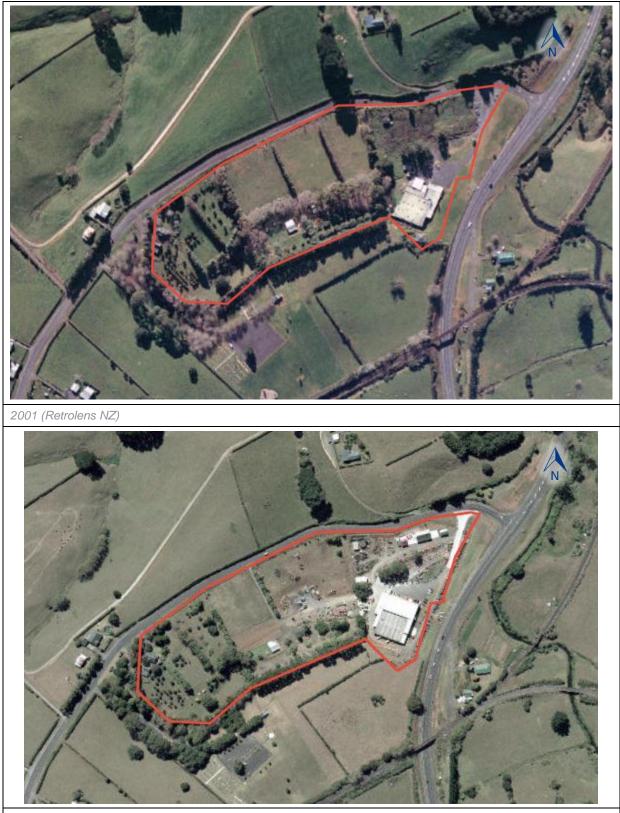






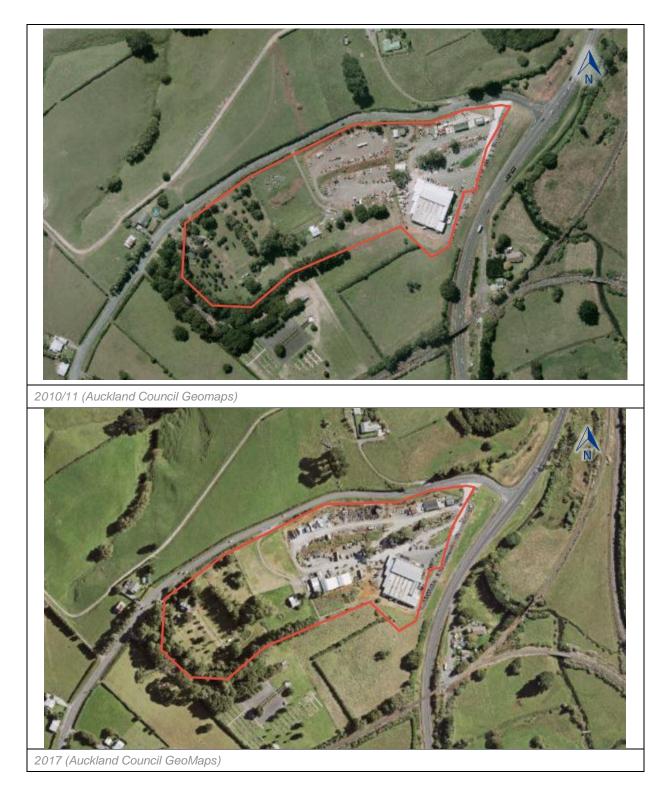






2006 (Auckland Council Geomaps)









2022 (NearMaps)









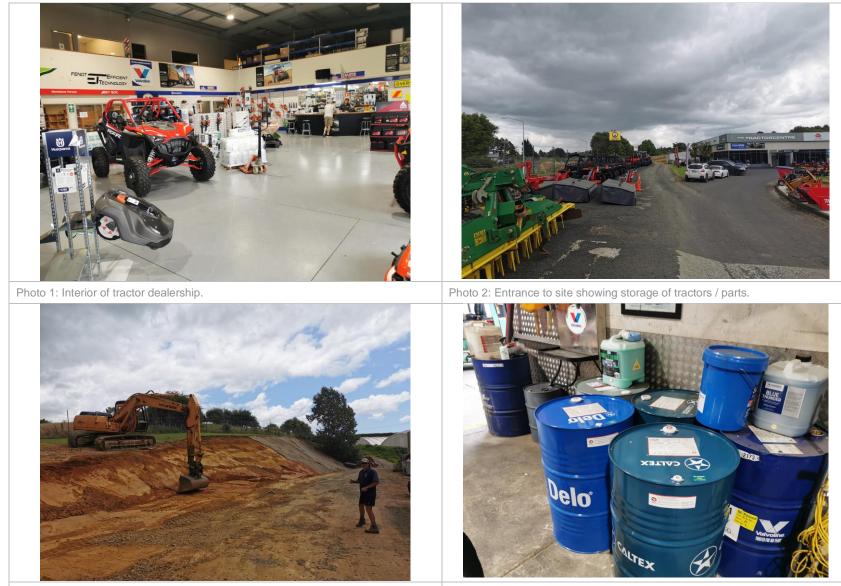


Photo 3: Earthworks area to the south of tractor centre.

Photo 4: Drums within workshop (situated on concrete pad in good condition).



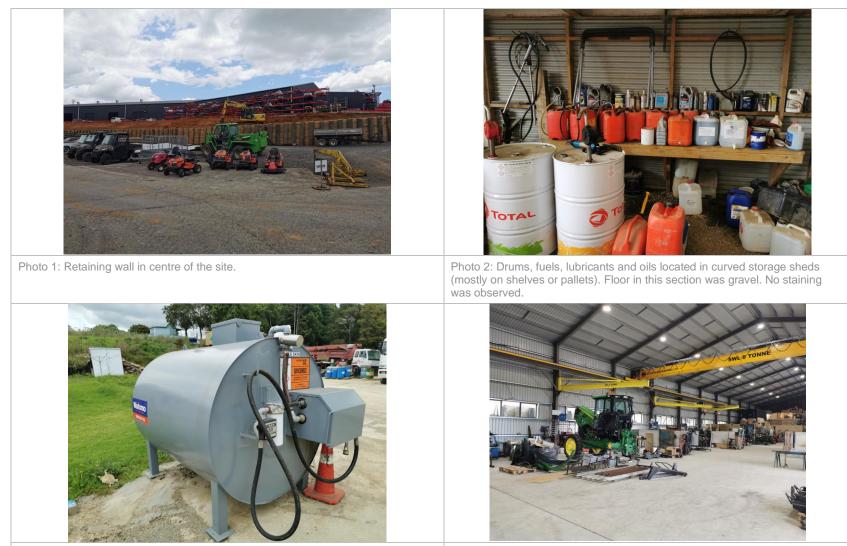


Photo 3: Above ground storage tank.

Photo 4: Interior of engineering firm.



