

7 April 2025

Auckland Thoroughbred Racing Incorporated
Attn: Adam Sadgrove
80-100 Ascot Avenue
Remuera
Auckland

Dear Adam

Contamination Assessment - 222-250 Manukau Road, Pukekohe, Auckland
(Our Reference: 25208.000.001)

1 Introduction

ENGEO Ltd was requested by Auckland Thoroughbred Racing Incorporated (ATR) to undertake a contamination assessment to support a private plan change (PPC) application to Auckland Council for rezoning a portion of the property located at 222-250 Manukau Road, Pukekohe, Auckland (shown on Figure 1). The PPC will comprise rezoning the land from 'Special Purpose – Major Recreation Facility Zone' to 'Residential – Mixed Housing Urban Zone' (MHU) and 'Open Space – Informal Recreation Zone' (OS-IR) under the Auckland Unitary Plan (Operative in Part) (AUP).

The overall Pukekohe Gateway Plan Change also includes an additional 'Business – light industry' (B-IL) zone located to the northwestern corner, shown in Figure 5 of the Barkers & Associates Section 32 Report¹. This assessment only considers contamination risks to the zones that are intended to undergo rezoning (i.e., MHU & OS-IR). For contamination risks associated with the B-IL zone reference shall be made to ENGEO's previous investigation report². This work has been carried out in accordance with our signed agreement dated 18 July 2024.

¹ Barkers & Associates 2025. Pukekohe Gateway Plan Change – Section 32 Assessment Report for Auckland Thoroughbred Racing. REF: 25140; Draft 2.0

² ENGEO, 2024 – Preliminary Site Investigation, 222-250 Manukau Road, Pukekohe, Auckland. Ref: 25208.000.001

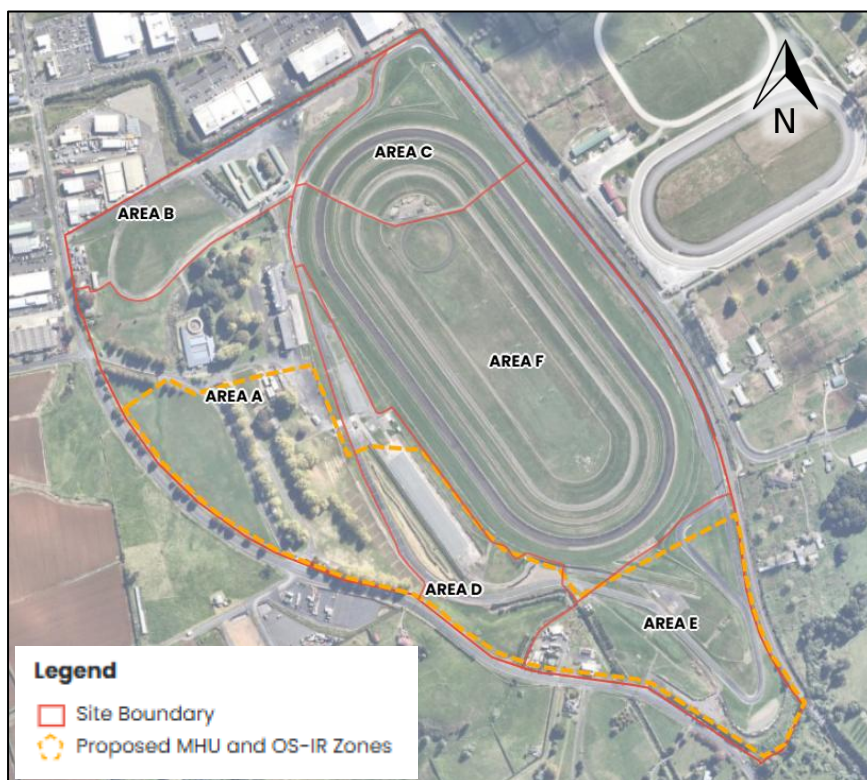
Figure 1: Site Area

Image sourced from Nearmap.

2 Scope of the Assessment

ENGEO has previously undertaken geotechnical³ and environmental assessments of the wider property located at 222-250 Manukau Road in 2024 (herein referred to as 'the site'); these reports should be read in conjunction with this letter.

This assessment has been completed with the intention of identifying key environmental constraints or data gaps that may preclude future conversion from 'Special Purpose – Major Recreation Facility Zone' to a 'Residential – Mixed Housing Urban Zone' and 'Open Space – Informal Recreation Zone'.

The previous site investigations which were undertaken in 2024 are considered suitable and no further site investigation works are proposed to support the PPC application. This assessment comprised a review of the relevant findings from the previous investigations completed.

3 Site Description

Site information and the setting (including the area relevant to the PPC) are summarised in Table 1 and Table 2, respectively.

³ ENGEO, 2024 – Geotechnical Preliminary Investigation Report, 222-250 Manukau Road, Pukekohe, Auckland. Ref: 25208.000.001

Table 1: Site Information

Item	Description
Legal Description	Lot 2 DP 337473, Lot 2 DP 100207, Lot 1 DP 337473, LOT 3 DP 511480, and LOT 2 DP 511480
Current Land Use	Horse racing track and associated buildings / training areas, former motor vehicle racetrack, and associated buildings. Large portions of the site are undeveloped with carparking, access roads, and grassed areas.
Site Area	Total Site Area: 72.5 Ha PPC Area: Approx. 22.96 Ha
Territorial Authority	Auckland Council

Table 2: Site Setting

Item	Description
Topography	<p>The PPC area dips significantly from the western boundary (RL60) to the eastern boundary (RL 50).</p> <p>The site dips significantly from the western boundary (RL60) to the centre of the site (variable between RL 50 to 55).</p> <p>The rest of the site and the southern end of the PPC area is generally flat at RL 55.</p>
Local Setting	<p>The site is located to the south of a commercial / business area and is bounded by Buckland Road to the east and Station Road (adjacent to a rail line) to the west.</p> <p>Overland flow paths are mapped flowing to a stream / culvert that runs north to south through the site. The stream is predominantly piped; however, portions are culverted. The stream flows into the Tutaenui Stream which flows in a southerly direction.</p>
Geology	<p>The PPC area is within the southern and western portions of the site. The western elevated portion of the site is mapped Basaltic Lava (Qsl) of the Kerikeri Volcanic Group. This consists variably weathered lava flows, often hard and in places displaying columnar jointing.</p> <p>The low-lying south-western portion of the site is mapped as Anthropogenic engineered ground, mixed cut and fill deposits (He). The map notes that these are areas where underlying geology is uncertain due to modification by human activities.</p>

3.1 Previous Investigations

As noted previously, ENGEO has undertaken geotechnical¹ and environmental² investigations of the site, however we understand that the PPC will only incorporate a portion of the site (shown in Figure 1).

The environmental investigation⁴ consisted of a desktop review of available information from historical aerials, Auckland Council site contamination enquiry, and property file. As a part of the investigation the site was separated into zones according to their historical use.

The report² identified the following potential activities in the PPC area which are included on the Hazardous Activities and Industries List (HAIL⁵), and considered to potentially have occurred or are currently occurring:

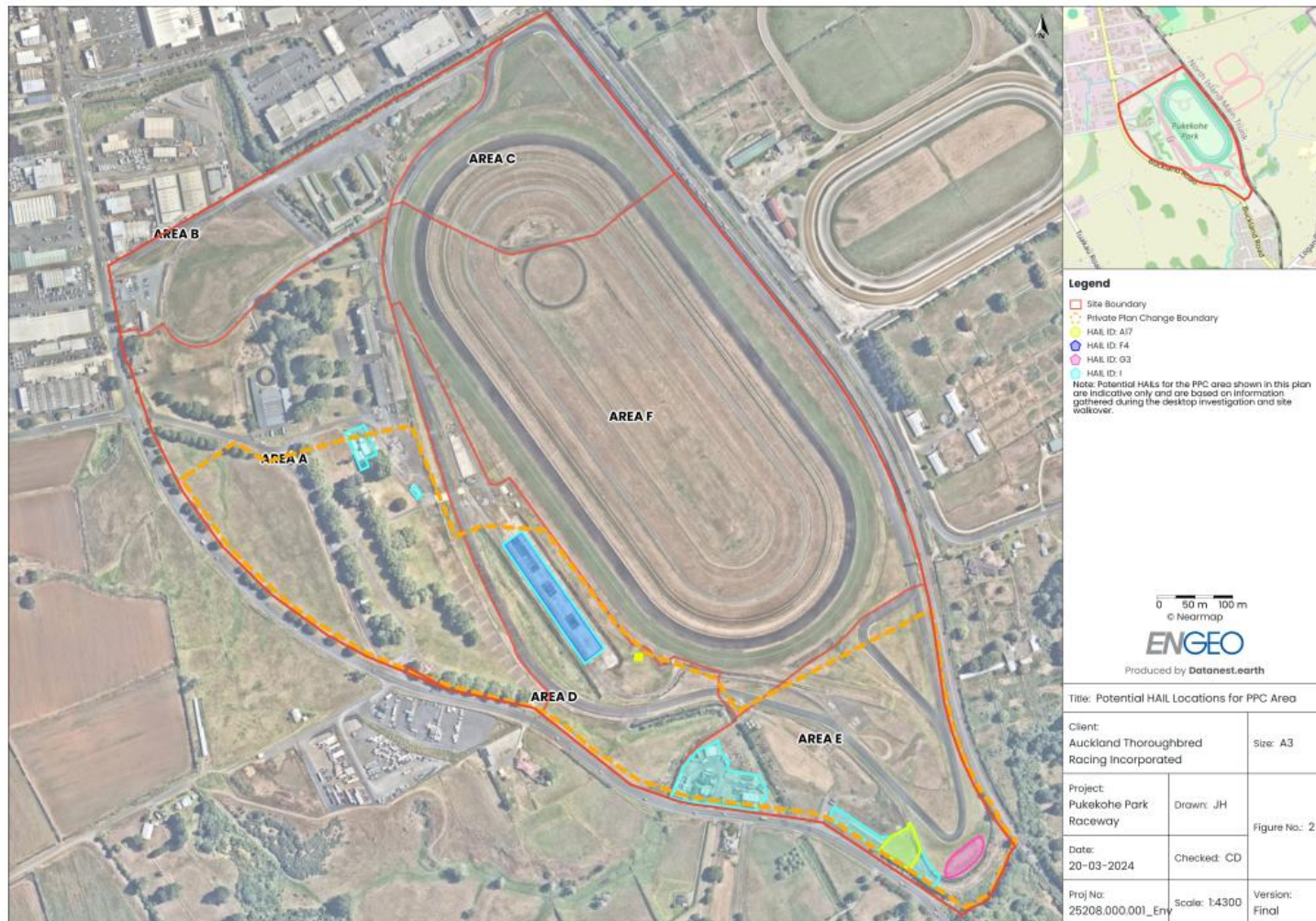
- **HAIL ID A17: Storage tanks or drums for fuel, chemicals or liquid waste.** An above ground fuel storage tank was identified within Area A. An old 2,000 litre aboveground storage tank was noted on the grass area south of the pitlane in Area D. Four 200 litre fuel storage drums and two 20 litre drums were noted in the storage yard in Area E.
- **HAIL ID F4: Motor Vehicle Workshops.** The pit garage and pit lanes have been used for maintaining and repairing race cars during race events, the bays underneath the stewards' room have been used for the ongoing inspection and maintenance of race cars.
- **HAIL ID G3: Fill Sites.** Property file information indicated that a large bund at the southern end of Area E was classified by Auckland Council as a Landfill.
- **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 the existing and former site buildings, it is likely that asbestos products are present within building materials. Contamination of adjacent soils may occur during cutting of building material that contains asbestos (e.g., for service installation) and weathering of exterior building material (Area A, Area B, Area D, and Area E). There is also a risk of contamination in yards storing plant / equipment used for site maintenance (Area A, Area B, Area D, and Area E). Additionally, storage sheds were noted within Area B and Area E. However, these were not accessible at the time of investigation, and therefore an assessment of potential sources of contamination within the sheds were not completed.

Indicative locations / extents of these areas are presented in Figure 2. Due to the likely presence of land uses on the site included on the HAIL, a detailed site investigation (DSI) will be required to support future resource consent applications involving change of land use or soil disturbance. The DSI will be supervised, and the report reviewed and approved by a suitably qualified and experienced contaminated land practitioner in accordance with national environmental regulations for soil contamination (NESCS).

We understand that since ENGEO's walkover (conducted on 21 March 2024), the buildings in the former concessions stand / storage yard area, and the pitlane and race control buildings have been demolished / removed.

⁵ Ministry for the Environment. (2011). Hazardous Activities and Industries List (HAIL).

Figure 2: Map Showing Potential HAIL



4 Conclusions

During ENGEO's investigation, no activities were identified which would be likely to preclude future conversion of the PPC area to residential land use from a contamination perspective, provided that the relevant provisions of the NESCS and the AUP are followed when the change in land use occurs.

This assessment is not intended to replace the need for a DSI during future redevelopment. An intrusive environmental investigation will be undertaken prior to earthworks, to support a resource consent application for subdivision and / or change in land use, and remedial works will be determined by the findings of the previous (and any future) investigation works.

5 Limitations

- i. We have prepared this report in accordance with the brief as provided. This report has been prepared for the use of our client, Auckland Thoroughbred Racing Incorporated, 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



Jack Hammond

Environmental Scientist

Report reviewed by



Claire Davies, CEnvP

Associate Environmental Consultant