Construction Environmental Management Plan

JOB NUMBER: 23-1883

Waikato Greenfield Racing Hub

PROJECT

Waikato Thoroughbred Racing Inc

CLIENT

SUBSTANTIVE APPLICATION – REV 1
16 September 2026

Construction Environmental Management Plan

23-1883 **Waikato Greenfield Racing Hub** **Corner Pencarrow, Hooker & Duncan Roads, Tamahere, Hamilton**



Prepared for: Waikato Thoroughbred Racing Inc **Project no:** 23-1883

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1 INTRODUCTION

1.1 Project Background

The purpose of the Project is to create a unique, world class greenfield racing hub designed for horse training, racing and other equine related activities, while bringing the expertise and strength of the local racing fraternity together in a centralised location. This enables the local racing industry to be more streamlined, competitive, sustainable and future focused while bringing potential international investment and creating a 'destination' for horse racing in New Zealand, also increasing tourism opportunities for the wider region. The Site location is show in Appendix A.

A key driver behind the proposed greenfield equine hub and racecourses is enabling the consolidation of four separate racecourse facilities (Te Rapa, Waipa and Cambridge thoroughbred courses, and the Cambridge harness track). These facilities duplicate assets and resources and, given their current condition require significant levels of upgrades and investment to provide fit-for-purpose facilities that meet the higher standards of the modern-day racecourse experience. The retirement of these areas also frees up significant tracts of land within existing urban areas for future development, increasing housing supply.

To support the development's financial viability and enhance the site's long-term vibrancy as a racing, entertainment, commercial and community precinct, the proposal includes a range of complementary activities on the remaining land. These include equine support services, rural residential housing developments, a retirement living community, a village centre and a bloodstock sales precinct. Masterplans for the Site are included in Appendix B. This plan shows:

1.2 Purpose.

On behalf of Waikato Thoroughbred Racing Inc, a principal contractor (yet to be confirmed) is required to carry out all works associated with the Waikato Thoroughbred Racing Greenfield Hub (The Project) in accordance with the CEMP. The purpose of the CEMP is to set out an overarching framework and construction methods to be undertaken to avoid, remedy or mitigate any adverse effects associated with the construction of the Project so far as reasonably practicable. The CEMP sets out measures including management methods, controls, and reporting standards to be implemented to meet the legislative requirements relating to construction activities associated with the project.

It also provides an overview of the different environmental aspects associated with the construction programme and sets out a comprehensive framework for the management of actual and potential adverse environmental effects associated with the Project. The CEMP shall be complied with and monitored throughout the duration of the Project's construction.

The CEMP is to be read in conjunction with the following appended documents:

- Appendix A: Hazardous Substances Handling and Storage
- Appendix B: Emergency Spill Procedures
- Appendix C: Environmental Risk Register
- Appendix D: Environmental Aspects and Impacts Register

The CEMP is an overarching 'umbrella' document which will incorporate a series of 'sub management plans' as well as the implementation methods for addressing specific effects associated with the Project works. The relationship between the CEMP and the sub management plans is set out in more detail in Section 1.4. This CEMP and sub management plans may be updated throughout the course of the Project's construction to reflect changes to construction techniques or the physical environment.

1.3 Construction Environmental Management Plan Objectives.

The purpose of the CEMP is to set out an overarching framework and construction methods to be undertaken to avoid, remedy or mitigate any adverse effects associated with the construction of the Project so far as is reasonably practicable. The objectives of the CEMP are as follows:

Set out the environmental management framework for managing potential adverse effects which may result from construction of the Project.

- Provide details of the construction methodology and management measures.
- Identify the compliance management system which will be in place throughout the construction period.

- Outline the processes for monitoring and review of CEMP performance.

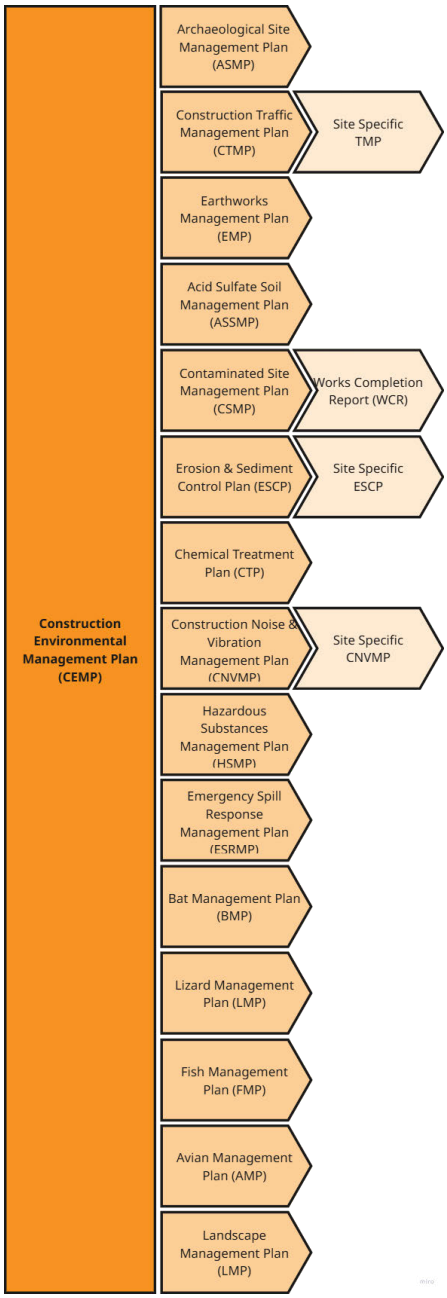
1.4 Management Plan Framework

As discussed in Section 1.2 the Project requires a set of management plans to ensure effective management of adverse effects associated with the construction of the Project. This CEMP sets the overarching framework for the management of environmental and social aspects of the Project and is supported by a series of 'sub management plans' focussing on specialist disciplines.

A number of specific plans have been identified in the proposed designation and resource consent conditions as requiring "certification" or submittal to the consenting authorities (WDC/WRC). These plans will require certification prior to the commencement of the main works. Further detail on the certification process is provided in Section 3.5.

Figure 1 illustrates the management plan structure including the CEMP and relevant sub-management plans.

Figure 1: Relationship between the CEMP and sub-management plans



1.5 Scope.

This version of the CEMP is intended to support the substantive phase application for resource consent for the Project. The substantive phase of a Fast-track application is the second major step in the Fast-track Approvals Act 2024 process. It begins after a project is either listed in Schedule 2 or successfully referred by the Minister.

1.6 Regulatory Framework & Jurisdiction

The Site falls under the regulatory jurisdiction of the Waikato District Council (WDC) and the Waikato Regional Council (WRC).

1.7 Management Plan Certification and Review

Once certified, minor amendments as a result of changes in design, construction materials, methods or management of effects can be made to the management plans without the need to seek recertification provided that the amendments are agreed to by WDC/WRC, prior to the implementation of any changes.

Management plans may be submitted in parts or stages to address activities or to reflect the staged implementation of the Project. If submitted in part, management plans will clearly show the linkage with plans for adjacent stages and interrelated activities.

Any amendments to a certified management plan that may result in a materially different outcome/effect will be submitted to WDC/WRC to certify these amendments are consistent with the relevant resource consent conditions prior to implementation.

If no written response is received from WDC/WRC within 10 working days of the management plan being submitted for certification, the management plans will be deemed to have certification and works can commence.

The CEMP will be reviewed at least annually and, if applicable, after an incident.

1.8 Relationship with Management Plans

This CEMP is intended to act as an umbrella management plan that sits over top of other management plans. These plans have yet to be confirmed but are likely to include those listed in **Table 1**.

Table 1: Anticipated Management Plans associated with the delivery of construction

Management Plan	Purpose of Management Plan	Regulatory Authority(ies)	Management Plan requirement source
Construction Environmental Management Plan (CEMP)	Integrates all environmental controls to manage construction impacts and compliance.	Waikato District & Regional Council	Resource Consent
Archaeological Site Management Plan (ASMP)	Protects archaeological sites through identification, monitoring, and controlled disturbance procedures	Waikato District Council / Heritage NZ Pouhere Taonga (HNZPT)	Resource Consent / Archaeological Authority
Construction Traffic Management Plan (CTMP)	Manages construction traffic to ensure safety, efficiency, and minimal community disruption	Waikato District Council	Resource Consent
Earthworks Management Plan (EMP)	Controls earthworks to prevent instability, manage runoff, and maintain environmental compliance	Waikato District & Regional Council	Resource Consent
Acid Sulfate Soil Management Plan (ASSMP)	Identifies and manages acid sulfate soils to prevent acidic runoff and contamination	Waikato Regional Council	Resource Consent
Contaminated Site Management Plan (CSMP)	Manages contaminated land risks through assessment, controls, and safe handling procedures	Waikato District & Regional Council	Resource Consent / Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011
Erosion & Sediment Control Plan (ESCP)	Prevents erosion and captures sediment to protect downstream environments	Waikato Regional Council	Prevents erosion and captures sediment to protect downstream environments
Chemical Treatment Plan (CTP)	Applies chemical treatment to improve sediment capture and maintain water quality	Waikato Regional Council	Applies chemical treatment to improve sediment capture and maintain water quality
Construction Noise & Vibration Management Plan (CNVMP)	Controls construction noise and vibration to meet standards and protect sensitive receivers.	Waikato District Council	Controls construction noise and vibration to meet standards and protect sensitive receivers
Hazardous Substances Management Plan (HSMP)	Manages hazardous substances storage, handling, and disposal to prevent harm	Waikato District & Regional Council	Resource Consent / Health & Safety at Work (Hazardous Substances) Regulations
Emergency Spill Response Management Plan (ESRMP)	Provides spill response procedures to contain, clean, and report environmental incidents	Waikato Regional Council	Resource Consent / Health & Safety at Work (Hazardous Substances) Regulations
Bat Management Plan (BMP)	Protects bats through habitat management, monitoring, and disturbance minimisation	Waikato District Council / Department of Conservation	Resource Consent

Lizard Management Plan (LMP)	Safeguards lizards via habitat protection, relocation, and monitoring measures	Waikato District Council / Department of Conservation	Resource Consent / Wildlife Permit
Fish Management Plan (FMP)	Protects fish through passage management, salvage procedures, and habitat safeguards.	Waikato Regional Council / Department of Conservation	Resource Consent / Wildlife Permit
Avian Management Plan (AMP)	Manages avian impacts through monitoring, protection, and disturbance minimisation	Waikato District Council / Department of Conservation	Resource Consent / Wildlife Permit
Landscape Management Plan (LMP)	Guides landscape restoration, planting, and visual impact mitigation	Waikato District Council	Resource Consent

1.9 Sub-Management Plans

Supporting the CEMP are 15 sub-management plans (refer **Table 1**). The following sections summarise both the plans and their general scope and purpose.

1.9.1 Archaeological Site Management Plan (ASMP)

An ASMP is required when works may affect archaeological sites under the Heritage New Zealand Pouhere Taonga Act. Its purpose is to protect cultural heritage by outlining identification, monitoring, and controlled disturbance procedures. The plan ensures compliance with archaeological authority conditions, accidental discovery protocols, and iwi expectations. It provides contractors with clear instructions on what to do if artefacts or features are uncovered and establishes roles for archaeologists and cultural monitors. The ASMP safeguards heritage values, prevents unlawful site modification, and ensures that any archaeological material is appropriately recorded, preserved, or managed.

1.9.2 Construction Traffic Management Plan (CTMP)

A CTMP is required by the WDC — and the New Zealand Transport Agency (Waka Kotahi) where state highways are affected—to manage construction-related traffic impacts. Its purpose is to maintain public safety, minimise disruption, and ensure efficient movement around work sites. The plan outlines temporary traffic controls, detours, signage, pedestrian management, and vehicle access arrangements. It ensures compliance with traffic regulations, integrates contractor responsibilities, and provides procedures for high-risk activities such as oversized loads or road closures. The CTMP supports safe construction operations while protecting the wider transport network and community.

1.9.3 Earthworks Management Plan (EMP)

An EMP is required by both the WDC and WRC to manage earthworks activities, particularly those involving land disturbance, cuts, fills, and stability risks. Its purpose is to ensure earthworks are planned and executed safely, with controls for erosion, sediment generation, dust, and runoff. The plan outlines staging, methodologies, monitoring, and environmental protection measures. It ensures compliance with consent conditions, regional earthworks rules, and industry best practice. The EMP helps prevent slope failure, off-site sedimentation, and environmental harm while supporting efficient construction progress.

1.9.4 Acid Sulfate Soil Management Plan (ASSMP)

An ASSMP is required where acid sulfate soils are present or suspected under WRC oversight. Its purpose is to identify, test, and manage soils that may generate acidic runoff when disturbed. The plan outlines sampling protocols, treatment methods, neutralisation procedures, and containment strategies. It ensures compliance with environmental standards and prevents contamination of waterways, infrastructure, and groundwater. The ASSMP provides contractors with clear instructions for safe handling, storage, and disposal of reactive soils, reducing environmental and health risks.

1.9.5 Contaminated Site Management Plan (CSMP)

A CSMP is required under the NES-Contaminated Soil regulations and WDC District Plan rules when land contains or may contain contaminants. Its purpose is to manage risks to human health and the environment during earthworks or redevelopment. The plan outlines investigation findings, contamination controls, soil handling procedures, disposal pathways, and monitoring requirements. It ensures compliance with national standards, protects workers and the public, and prevents off-site migration of contaminants. The CSMP provides a structured approach to safely managing contaminated materials while enabling development to proceed responsibly.

1.9.6 Erosion & Sediment Control Plan (ESCP)

An ESCP is required by the WRC to prevent erosion and capture sediment during earthworks. Its purpose is to protect waterways, infrastructure, and downstream environments from sediment discharge. The plan outlines treatment devices, staging, stabilisation methods, monitoring, and rainfall response procedures. It ensures compliance with regional earthworks rules, industry guidelines, and consent conditions. The ESCP provides contractors with clear operational controls to maintain water quality, reduce environmental harm, and support regulatory compliance throughout construction. Site specific ESCP will be developed to address specific areas of the site and construction activities.

1.9.7 Chemical Treatment Plan (CTP)

A CTP is required by the WRC when chemical flocculation is used to enhance sediment capture. Its purpose is to ensure safe, effective, and compliant dosing of treatment chemicals. The plan outlines chemical selection, dosing rates, system calibration, monitoring, and emergency procedures. It ensures alignment with HSNO requirements, EPA approvals, and regional water quality standards. The CTP provides contractors with clear instructions for operating treatment systems, preventing overdosing, and maintaining consistent performance in variable weather and soil conditions.

1.9.8 Construction Noise & Vibration Management Plan (CNVMP)

A CNVMP is required by the WDC to manage construction noise and vibration impacts on nearby receivers. Its purpose is to ensure compliance with district noise limits, protect sensitive environments, and minimise disturbance. The plan outlines equipment controls, operating hours, monitoring, mitigation measures, and communication protocols. It provides contractors with clear guidance on managing high-risk activities such as piling or rock breaking. The CNVMP supports predictable, well-managed construction operations while maintaining community wellbeing. Site specific CNVMP will be developed to address specific areas of the site and construction activities.

1.9.9 Hazardous Substances Management Plan (HSMP)

An HSMP is required under HSNO regulations and by both the WDC and WRC conditions to manage hazardous substances on construction sites. Its purpose is to ensure safe storage, handling, use, and disposal of chemicals, fuels, and dangerous goods. The plan outlines inventory controls, segregation, spill prevention, emergency procedures, and regulatory compliance. It integrates Environmental Protection Authority (EPA) and Fire & Emergency New Zealand (FENZ) requirements and provides contractors with clear operational guidance. The HSMP reduces environmental and safety risks, ensuring hazardous substances are managed responsibly throughout the project.

1.9.10 Emergency Spill Response Management Plan (ESRMP)

An ESRMP is required by the WRC and FENZ to manage spill risks associated with fuels, chemicals, and hazardous materials. Its purpose is to ensure rapid containment, cleanup, and reporting of spills to prevent environmental harm. The plan outlines response procedures, equipment requirements, roles, communication pathways, and regulatory obligations. It ensures contractors are prepared for incidents and can act quickly to protect waterways, soil, and public safety. The ESRMP strengthens environmental resilience and reduces the consequences of accidental releases.

1.9.11 Bat Management Plan (BMP)

A BMP is required by the WDC and DOC where long-tailed bats may be affected by development. Its purpose is to protect bat populations through habitat assessment, monitoring, and mitigation. The plan outlines survey methods,

roost protection, vegetation management, and construction timing controls. It ensures compliance with wildlife legislation and integrates iwi values. The BMP provides contractors with clear procedures to avoid disturbance, manage risks, and support conservation outcomes.

1.9.12 Lizard Management Plan (LMP)

An LMP is required by the WDC and DOC where native lizard habitat may be disturbed. Its purpose is to protect lizard populations through habitat identification, salvage, relocation, and monitoring. The plan outlines survey protocols, capture methods, release sites, and construction controls. It ensures compliance with wildlife legislation and supports biodiversity protection. The LMP provides contractors with practical steps to minimise ecological impacts and maintain regulatory compliance.

1.9.13 Fish Management Plan (FMP)

An FMP is required by the WRC—and DOC or MPI depending on species and fisheries context—when works affect freshwater fish or instream habitats. Its purpose is to protect fish through salvage procedures, passage management, habitat controls, and monitoring. The plan outlines methods for safely relocating fish, managing diversions, and preventing harm during instream works. It ensures compliance with freshwater regulations and supports ecological outcomes. The FMP provides contractors with clear operational guidance to minimise impacts on aquatic life.

1.9.14 Avian Management Plan (AMP)

An AMP is required by the WDC and DOC where bird species or nesting habitats may be affected. Its purpose is to protect avian populations through monitoring, habitat management, and disturbance minimisation. The plan outlines survey methods, buffer zones, timing restrictions, and construction controls. It ensures compliance with wildlife legislation and integrates ecological and cultural considerations. The AMP supports responsible development while safeguarding bird species and habitats.

1.9.15 Landscape Management Plan (LMP – Landscape)

A Landscape Management Plan is required by the WDC to manage visual and amenity outcomes associated with development. Its purpose is to guide planting, restoration, screening, and long-term landscape integration. The plan outlines species selection, maintenance requirements, staging, and design principles. It ensures compliance with district plan landscape provisions and supports high-quality environmental outcomes. The Landscape MP provides contractors and designers with clear direction for achieving consistent, attractive, and enduring landscape results.

1.10 Staging of CEMP through the delivery of the Project

This version of the CEMP is not intended to be used for construction as there simply is not sufficient information available to develop a fit for purpose (fit for construction) Plan. A series of CEMP updates are anticipated as the project transitions through a series of phases . The nature of this phasing is illustrated in **Table 2**

Table 2: Project Phases & the nature of CEMP content

Project Phases	CEMP related activity on Site	Summary of CEMP Content
Substantive Application	• NIL	• High level summary of anticipated management commitments prior to knowing the confirmed resource consent, archaeological authority, and wildlife permit conditions.
Resource Consents issued (pre-construction)	• Final investigations required to compile and finalise management plans.	• Specific resource consent condition related managerial commitments. • Pre-construction, construction, and post construction commitments detailed.
Contractor Engagement & Appointment (pre-construction)	• CEMP becomes operational once approved by WDC/WRC.	• Fine-tuning and editing of CEMP content with specific contractor related details and information.
Construction	• CEMP	• Fully operational and approved document.

1.11 Construction related Consents, Authorities, Permits.

To complete the Project in terms of construction the following resource consents are sought, refer **Table 3**.

Table 3: Anticipated Resource Consents, Archaeological Authorities, and Wildlife Permits for construction

Construction Activity	Planning Context	Regulatory Agency Responsible
Earthworks (soil disturbing activities)	• Restricted Discretionary Activity consent (Rule EW-R21 – Earthworks General. • Restricted Discretionary Activity Rule EW-R22 – Earthworks General). •	Waikato District Council
	• Discretionary Activity Rule 5.1.4.13 • Discretionary Activity Rule 5.2.5.5	Waikato Regional Council
Noise & Vibration	• Discretionary Activity consent (Rule NOISE-R4) – Construction	Waikato District Council
Take/Use/Divert Water	• Discretionary Activity Rule 3.3.4.24 – Groundwater take. • Non-Complying Activity pursuant to Rule 3.3.4.26 to use water – Surface water	Waikato Regional Council
Discharge	• Discretionary Activity Rule 3.3.4.24 • Non-Complying Activity pursuant to Rule 3.3.4.26	Waikato Regional Council
Archaeological authority	• Sections 42 and 56 of the Heritage New Zealand Pouhere Taonga Act 2014.	Heritage New Zealand
Wildlife Permit	• Section 53, 54, and 56 of the Wildlife Act 1953.	Department of Conservation

Should these be issued, each resource consent, authority, or permit will have specific conditions that will require either this CEMP or a sub-management plan (refer **Table 1**) to address. These requirements will drive a requirement to update the management plans.

2 ROLES AND RESPONSIBILITIES

Any person involved with the construction of the Project has a role in the implementation of the CEMP.

The construction team has a responsibility to identify and report all environmental aspects within the workplace and to monitor environmental awareness on site. **Table 4** below sets out the names, roles, responsibilities and authorities, and technical expertise of principal personal involved in the implementation and operation of the CEMP.

Contractors have not yet been confirmed for the construction of the Project. When they are appointed, they will assign a "Project Manager" to the project who will be responsible for the implementation of the CEMP and associated sub-management plans. For the purposes of this work, the draft anticipated roles and responsibilities have been set out in **Table 4**.

Table 4: Management Roles & Responsibilities (Indicative Only).

Position	Contact Name & Company	Responsibilities
Waikato Thoroughbreds Racing Ltd	TBC	• Ensure that commitments made in the CEMP are delivered upon by the Principal Contractor and PM. • Ensure that in selecting a Principal Contractor and Project Manager that emphasis is placed on their experience and history of environmental performance and compliance with resource consents, discharge permits, authorities, and wildlife permits along with commitments made in the CEMP and sub-management plans.
Principal Construction Contractor	TBC	• Ensures that the Project Manager (PM) is aware of the importance of following the CEMP and sub-management plans and provide the necessary support and resources to the PM to deliver upon the commitments made in all the management plans. • Ensure that the Project Manager is aware and clear about their responsibilities under this plan. • Ensure that the PM is adequately experienced and resourced to be able to deliver upon the commitments made in the CEMP and all sub-management plans.
Project Manager	TBC	• Principal Project contact for WDC, WRC, and DoC. • Responsible for all day-to-day construction operations on the Project. • Overall responsibility for ensuring environmental compliance is maintained onsite and all actions identified by onsite compliance monitoring inspections are completed as soon as practicable. • Ensure that the site is available to the WDC/WRC Compliance Manager or other Council representatives for inspections if required subject to receiving the appropriate site induction and health and safety briefings. • Implementation of the CEMP and sub management and mitigation plans onsite. • Ensuring all Staff and sub-contractors undergo an induction that includes environmental management requirements.

Site Manager /Supervisor	*TBC*	• Ensure that all staff who work on the site, including sub-contractors, are made aware of the environmental control measures on site during their induction onto site. • Complete daily inspections of the erosion and sediment controls to ensure they are functioning correctly and direct any maintenance or corrective actions needed. • Liaise with WDC/WRC staff who attend site to complete compliance inspections. • Provide on-the-ground support to the visiting environmental specialists (Project Ecologist, Protect Archaeologist, Environmental Advisor and Consultant). • Direct and supervise the installation of environmental controls in accordance with the CEMP.
Project Ecologist	TBC	• Supporting the PM deliver upon the commitments of the Vegetation, Landscape Fish, Lizard, Bird and Bat Management Plans. • Liaise with WDC/WRC/DoC representatives as required.
Project Archaeologist	TBC	• Supporting the PM deliver upon the commitments of the Archaeological Site Management Plan. • Liaising with Heritage New Zealand. • Liaise with WDC/WRC/HNZPT representatives as required.
Project Environmental Advisor	TBC	• Provide specialist environmental advisory services and support. • Project Ecology and Landscape support. • Provision of Environmental Training (Erosion and Sediment Control, Management of Hazardous Substances, Archaeological site management, Emergency Spill Response. • Completion of monthly project environmental management reports. • Completion of routine monthly environmental inspections. • Completion of routine construction noise monitoring. • On-site environmental compliance assistance as required.
Environmental Consultant	*BCD Group Limited* *Simon Cathcart* M: 027 246 9687 E: simonc@bcdgroup.nz	• Support the Project Manager/Supervisor with technical advice and on-site support as required.

3 PROJECT DESCRIPTION

3.1 Location

The site is located on multiple rural properties to the south-east of Hamilton City in the rural area of Tamahere and occupies approximately 165ha between Pencarrow Road, Hooker Road, Duncan Road the Waikato Expressway (Refer Appendix A). **Table 5** identifies the properties involved.

Table 5: Property Details involved in the Waikato Thoroughbred Racing Hub

Attribute	Address	Legal Description (Area)
Address and legal description	37 Hooker Road & 38 Duncan Road, Tamahere, Hamilton	Section 2 SO 547526 [RT 1027516] 69.6 (ha)
	90 Duncan Road, Tamahere, Hamilton	Lot 2 DP 16925 [RT SA383/181] 14.2ha
	536 Pencarrow Road, Tamahere, Hamilton	Lot 2 DP 471383 [RT 650204] 18.5ha
	592 Pencarrow Road, Tamahere, Hamilton	Lot 1 DP 471383 [RT 650205] 23.8ha
	636 Pencarrow Road, Tamahere, Hamilton,	Section 49 SO 457609 [RT: 632409] 37.6ha
	644 Pencarrow Road, Tamahere, Hamilton	Section 46 SO 457609 [RT 632392] 13.5ha
Total Site Area	Approximately 165.5ha	

3.2 Physical works outside of the temporary construction area

Some construction activities associated with the Project may take place outside of the temporary construction area. At this stage the nature and extent of these activities cannot be confirmed. Examples of the type of activities include:

- Extensions and amendments to cycleways and footpaths.
- Utility infrastructure (Gas, Electricity, Water supply, Fibre).
- Intersection upgrades/argumentation at (Tamahere Dr/Pencarrow Rd, Pencarrow Rd/Hooker Rd, Hooker Rd/Duncan Rd).

3.3 Schedule of construction activities

Listed in **Table 6** is an indicative schedule of physical construction activity. This will evolve during the construction period for the project as site conditions become fully understood. The estimated overall Project program time frames are from October 2028 to an expected end date of May 2032.

Table 6: Construction Schedule (Indicative Only)

Start Date	Finish Date	Project Activities
Q3 2029	Q1 2032	• Vegetation protection (fencing) • Installation of erosion and sediment controls • Vegetation removal • Topsoil stripping and stock piling • Service relocations (utilities) • Entranceway reconfigurations. • Stormwater swales, ponds and network installation • Training track, main track, and harness track construction including underpass. • Civil infrastructure (roads, curb and channel, parking areas). • Building foundations and pads. • Fencing, lighting and landscaping
Q3 2029	Q1 2032	• Construction of equine facilities (Bloodstock precinct, commercial development, events buildings, operational buildings, trainer zone)
TBC	TBC	• Residential precincts (senior living, lifestyle blocks).

3.4 Hours of operation during construction

Normal working hours, will be:

- For on-site construction activities: 7:30am to 6.00pm Monday to Saturday (excluding public holidays).
- For earthworks related heavy vehicle movements on public roads: 9:00am - 6:00pm Monday to Friday (excluding public holidays).
- For all non-earthwork related heavy vehicle movements on public roads: 9:00am -6:00pm Monday to Friday (excluding public holidays).

3.4.1 Working hours exemptions

If work is required outside of the hours of operation described above, then the Project Manager can apply to the WDC Compliance Monitoring Officer (CMO). Any proposal to temporarily vary the hours of operation must be made in writing and must include the following information:

a) A written proposal, with a clear map(s) and/or diagram(s), outlining the need for the variation, the proposed variation area, any activities proposed to be undertaken within the variation area, and an appropriate assessment of the effect(s) of the temporary exemption to operating hours.

b) Details, if any, of any proposed work(s) or activity(ies) that may be used to offset or mitigate any effect(s) of the proposed temporary exemption to operating hours.

c) Details, if any, of any temporary or permanent positive effect(s), including net positive effects, on the community that may be associated with the proposed temporary exemption to operating hours.

d) A summary of consultation undertaken with and feedback received.

3.5 Commencement of construction activities

For construction activities to commence the following criteria/milestones will be required:

1) All resource consents, authorities and permits will have been issued.
2) All preconstruction related resource consent, authority, and permit conditions will have been complied with, including but not limited to:
   a) Receipt of all written authorisations from the relevant Regulatory Authority (WRC/WDC/DoC/NZHPT) have been received covering off approval /certification of Construction Phase Management Plans.
   b) Notification and communication with key Stakeholders.
   c) Recording and capture of baseline environmental monitoring has been completed.

This section will be reviewed and updated when conditions have been received.

4 ENVIRONMENTAL CONDITIONS

4.1 Elevation and Topography

The Site is relatively flat and currently covered in grazing pasture. Soft undulations cover the property and increase to the north-western boundary adjacent Pencarrow Road. A detailed topographic survey has been completed (Refer Appendix C).

4.2 Geology

The published geology for the Site shows most of the Site is underlain with Late Pleistocene River deposits from the Hinuera Formation described as “cross-bedded pumice sand, silt and gravel with interbedded peat”. There is an intrusion along the western boundary of the Site of early-middle Pleistocene River and igneous deposits of the Walton subgroup, described as alluvium dominated by primary and reworked, non-welded ignimbrite.

4.3 Soils

The Site is underlain with Typic Orthic Allophonic soils, with an area of Typic Orthic Gley soils intruding into the site from the eastern boundary. There are also Typic Orthic Granular soils coming into the site across the western boundary.

4.3.1 Subsoil profile

The subsoil profile encountered at the site is typical of the area surrounding the site and is consistent with the mapped regional geology.

4.3.2 Surficial Soils

The near surface conditions as encountered in the hand augers consist of 100-300mm of topsoil.

Below the topsoil, the general soil profile consisted of a 0.3m to 0.5m thick layer of stiff to very stiff silts overlaying interbedded sands and silts. The sands generally dominated the soil profile and were loose to dense (Hinuera Formation). Due to poor soil recovery, Scala penetrometer testing was continued below the hand auger depths and is shown on the logs.

4.3.3 Deeper Soils

Testing indicate the deeper soil profile consists of sands, with varying thickness of silt and clay lenses through to the base of the CPTs.

4.4 Acid Sulphate Soil Risk

BCD prepared a preliminary report assessing the risk associated with acid sulfate soils at the Site because the Waikato Regional Council acid sulfate risk screening map showing the Site as in a medium / high risk area.

28 samples were obtained from six sampling locations. All sampling locations presented at least one indicator of acid sulfate soils. Consequently, acid sulfates could not be conclusively ruled out, and a more comprehensive Acid Sulfate Management Plan (ASMP) was recommended.

When the civil earthworks design progresses past concept a more comprehensive ASMP can be developed that contains:

- an integrated management approach to earthworks
- handling and management protocols of acid sulfate soils

Low pH conditions are likely to complicate any chemical treatment approaches adopted as part of this ESCP. Consequently, the ASMP will be integrated into the chemical treatment section of this Plan when it is developed.

4.5 Groundwater and Dewatering

Groundwater was encountered at depths of 0.9m to 2.8m below ground level (bgl) at the time of the investigation in November. The groundwater was shallowest on the northeastern part of the site with groundwater progressively deepening towards the west and south. However, the depth variation is also a function of the changes in the ground surface elevation. When converted to reduced levels the groundwater is between RL 52m to 53.5m which is considered typical of spring levels in the area and is likely to be higher following periods of prolonged or intense rainfall.

BCD have installed piezometers in selected locations across the site and will be periodically monitoring them over the duration of the design works. Over the period from December 2025 to mid-March 2026, we have found groundwater fluctuations between 200mm to 300mm. A groundwater table of 1m bgl has been used in our preliminary assessment of liquefaction for uniformity.

Due to the shallow groundwater depth, it is anticipated that excavations for infrastructure or foundations will extend below the water table in parts of the site. Saturated sands are likely to be encountered in these scenarios which will impact the stability of the excavations.

The stability of temporary excavations below the groundwater can be managed through, slope design, dewatering, trench shields and temporary retaining, depending on location and depth of the excavation.

Dewatering the shallow groundwater table is unlikely to result in ground surface settlement due to the sandy nature of the zone being dewatered. Water from well points or sump pumps can be diverted away from the excavation and spread over the ground to recharge via infiltration, or to a designated recharge well.

During design phases dewatering needs will be assessed for compliance with the Waikato Regional Plan and any necessary consent will be obtained.

4.6 Slope Stability

The existing slopes are generally no steeper than 1V:6H and not considered to have a risk of slope instability. A natural slope is located within the western boundary which runs along Pencarrow Road. New slopes should be specifically assessed, although 1V:2.5H can be adopted for preliminary purposes for slopes not intercepting the water table. For ponds or other areas where cuts may be below the water table, shallower slope angles may be required or retaining / slope reinforcement incorporated into the design.

Final slope angles will be verified through geotechnical investigation, particularly where groundwater, weak soils, or construction disturbance may influence stability. This verification will be completed by a Chartered Professional Engineer (CPEng).

4.7 Hydrology (Surface Water)

An unnamed tributary of the Mangaone Stream is located within the centre of the Site. Also connected to the Site via a culvert under the Waikato Expressway (approximately 400m north of the Site) is the Mangaomapu Stream. The Waikato River is approximately 500 m to the south. Within the Site multiple man-made drains and stormwater channels have been excavated to run along the paddock boundaries. The surface topography directs the majority of surface water flows into these drains, before leaving the Site to the northwest via the un-named tributary of the Mangaone Stream. A significantly smaller portion of surface water runoff leaves the site to the North, under the Expressway, and into the Mangaomapu Stream (Refer Figure 1).

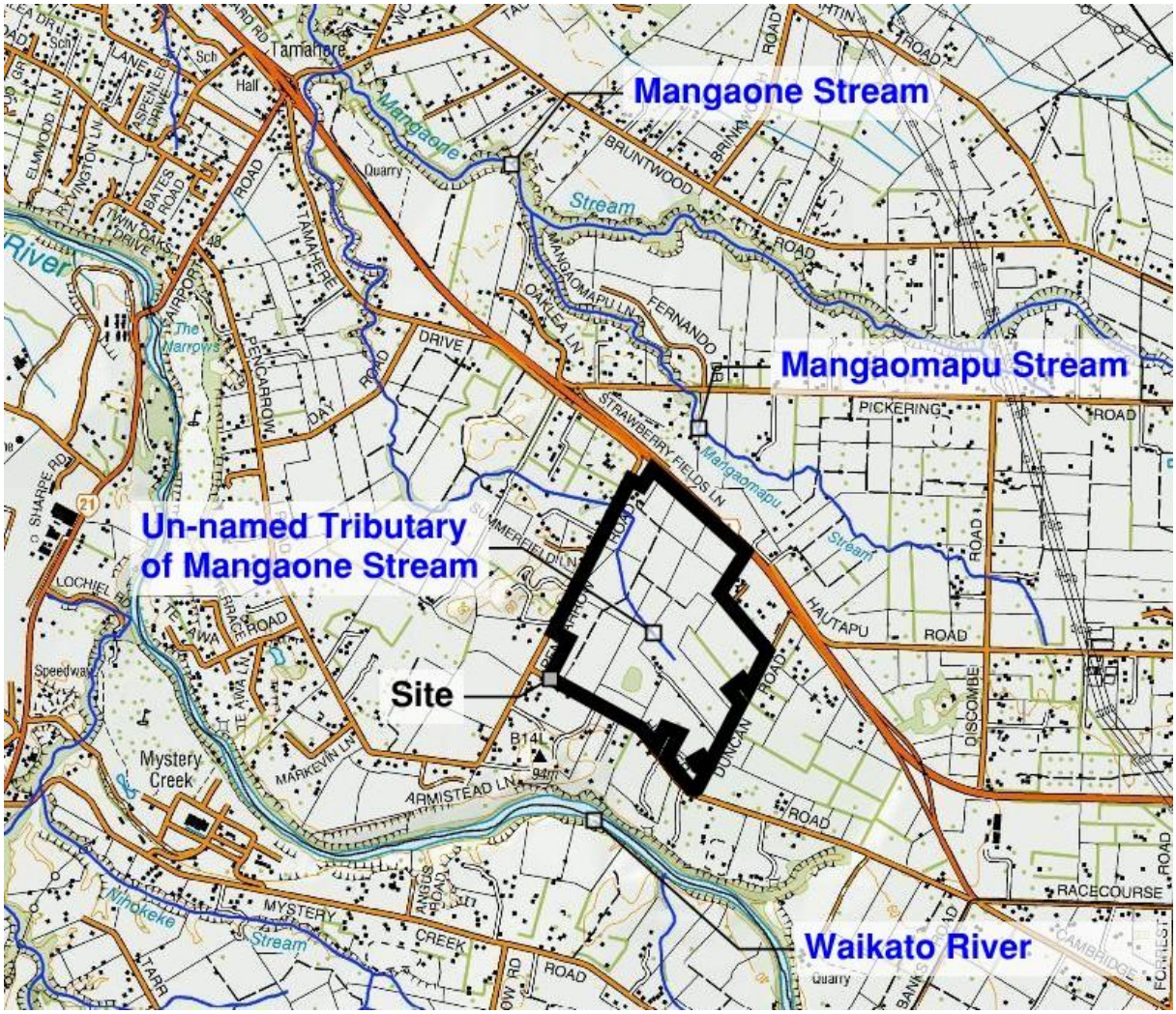


Figure 2: Surface Water Hydrological Connections.

5 ECOLOGY

An integrated approach to safely delivering the construction while protecting wildlife and the environment will be undertaken by the Project. The approach will be guided by a number of management plans that individually address different ecological groupings – vegetation, fish (freshwater ecology), lizards, birds and bats. The key actions/deliverables from these management plans will collated into a delivery programme and allocated to Project staff and sub-contractors when the plans have been finalised and approved.

5.1 Vegetation

Vegetation across most of the 160-ha site is highly modified pasture dominated by exotic grasses such as ryegrass, Yorkshire fog, clover and plantain. Hedgerows of hawthorn and barberry form linear structure but are ecologically low-value. The key indigenous feature is the 0.95ha kahikatea stand, containing mature kahikatea, pokākā, tītoki, mataī and tawa. The stand is degraded, unfenced, and hydrologically altered by perimeter drains, yet remains regionally under-represented and ecologically significant. A small natural wetland occurs within it.

5.2 Fish

The property contains a network of artificial watercourses, confirmed by Waikato Regional Council. Channels are shallow (0.05–0.2 m deep), slow-flowing, and dominated by exotic macrophytes such as starwort, water pepper and watercress. Habitat quality is low, with minimal riparian cover and likely ephemeral flow. Fish trapping detected no individuals, but eDNA confirmed shortfin eel presence. Downstream connectivity leads to Mangaonua Stream, where several At-Risk species occur. Effects will require fish recovery and a Fish Management Plan.

5.3 Lizard

Lizard habitat is limited but present in the kahikatea stand, particularly within fallen logs, dead wood and a firewood pile. The most likely indigenous species is copper skink (At Risk – Declining), consistent with nearby iNaturalist records. The wider pasture and hedgerows may also support copper skink or pest rainbow skinks. No lizards were detected during log-rolling searches. Habitat loss from development is expected to be minor, provided pre-clearance searches, retention of cover objects, and restoration planting within the kahikatea stand are implemented.

5.4 Bird

The site supports common indigenous birds such as pied stilt, pukeko, welcome swallow, paradise duck, kingfisher and spur-winged plover. Mature exotic trees and the kahikatea stand provide nesting and foraging habitat, while open pasture supports ground-feeding species. No threatened birds were recorded, though mobile species like North Island kākā may occasionally visit. Vegetation clearance poses low ecological risk but requires nesting-bird checks. Overall avifaunal value is low due to dominance of exotic habitat and absence of significant indigenous assemblages.

5.5 Long-tailed bat (Pekapeka-tou-roa)

Long-tailed bats (Threatened – Nationally Critical) are the site's highest-value fauna. Eight of nine ABMs detected bats, with 191 passes recorded, and Site 4 within the kahikatea stand showing 129 passes and seven feeding buzzes. The stand contains multiple potential roost trees, including dead kahikatea with cavities and flaking bark. Key risks include habitat loss and artificial lighting. Mitigation requires retention and restoration of the stand, strict lighting limits (0.3 lux, 2700 K), a 50 m bat commuting corridor, and DOC-compliant roost-felling protocols.

6 ENVIRONMENTAL RISK MANAGEMENT

Effective environmental risk management is essential to identifying, assessing, and controlling potential environmental impacts associated with construction activities. The risk assessment framework presented in this CEMP provides a consistent and transparent method for evaluating environmental risks by considering both the likelihood of an event occurring and the severity of its potential consequences.

The likelihood **Table 7** and consequence **Table 8** define the criteria used to assign risk scores, while the risk matrix (Refer **Table 9** combines these scores to determine the overall level of risk. This process supports the PM in delivering informed decision-making, prioritisation of mitigation measures, and the implementation of appropriate controls to minimise adverse environmental outcomes.

Table 7: Risk Likelihood score and ratings

Likelihood score and rating	
Likelihood rating	**Description**
Almost certain	Is expected to occur in most circumstances (>85% chance of occuring)
Likely	Will probably occur in most circumstances (55% to 85% chance of occuring)
Possible	Could occur (30% to 55% chance of occuring)
Unlikely	Could occur but not expected (5% to 30% chance of occuring)
Rare	Occurs but only in exceptonal cicumstances (<5% chance of occuring)

Table 8: Likelihood and consequence are used to determine the overall risk level

	Insignificant	Minor	Moderate	Severe	Extreme
Almost certain	Low	Medium	High	Critical	Critical
Likely	Low	Medium	High	Critical	Critical
Possible	Low	Medium	Medium	High	Critical
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Low	Low	High

The Aspects (risks) identified in the Risk Matrix (**Table 9**) when uncontrolled/unmanaged represent a certain risk. The risk is then addressed and managed via the controls identified in either a single or multiple management plans). The management of the risk in accordance with the management plan down grades the risk to the environment.

Table 9: Waikato Thoroughbred Racing Hub Construction Phase Risk Matrix

Principal Construction Activity	Sub Activity	Environmental Aspect (Risk)	Possible Impact	Risk Owner	Uncontrolled (current) risk			Relevant Environmental Management Plan(s) addressing the Risks	Controlled (residual) risk		
					Likelihood of Risk	Consequence of Risk	Raw Risk level		Likelihood of Risk	Consequence of Risk	Residual risk level
Earthworks	Cut and fill operations including stockpiling	Air quality	Generation of nuisance dust that crosses the Site boundary into adjacent properties and adjacent roads/highways.	Project Manager	Likely	Moderate	High	Erosion & Sediment Control Plan (ESCP) Site Specific ESCP	Possible	Moderate	Medium
					Likely	Moderate	High	Construction Traffic Management Plan (CTMP)	Unlikely	Moderate	Medium
		Freshwater quality	Discharge (release) of contaminants (Soil/Water) including low pH Fish Habitat destruction/fragmentation and animal mortality		Possible	Severe	High	Acid Sulfate Soil management Plan (ASSMP) Contaminated Site Management Plan (CSMP) Fish Management Plan (FMP)	Unlikely	Severe	Medium
		Heritage	Destruction of artefacts and koiwi		Unlikely	Moderate	High	Archaeological Site Management Plan (ASMP)	Rare	Moderate	Low
	Stormwater construction including drain excavations	Freshwater quality	Generation of sediment laden water that enters wetlands and watercourses without treatment. Fish Habitat destruction/fragmentation and animal mortality		Likely	Moderate	High	Erosion & Sediment Control Plan (ESCP) Site Specific ESCP	Rare	Moderate	Low
	Earthworks adjacent watercourses				Likely	Moderate	High	Erosion & Sediment Control Plan (ESCP) Site Specific ESCP Fish Management Plan (FMP)	Unlikely	Moderate	Medium
	Heavy machineary operation	Noise and vibration	Generation of nuisance noise and vibration that impacts on neighbouring properties		Possible	Severe	High	Construction Noise & Vibration Management Plan (CNVMP) Site Specific CNVMP	Unlikely	Severe	Medium
Concrete Works	Drainage installation, Foundation works, curb and channel	Freshwater quality	Generation of high pH construction waste water/runoff that enters wetlands and water courses without treatment Fish Habitat destruction/fragmentation and animal mortality	Project Manager	Possible	Moderate	Medium	Hazardous Substances Management Plan (HSMP) Emergency Spill Response Plan (ESRP)	Unlikely	Moderate	Medium
		Noise and vibration	Generation of nuisance noise and vibration that impacts on neighbouring properties		Possible	Moderate	Medium	Construction Noise & Vibration Management Plan (CNVMP) Site Specific CNVMP	Unlikely	Moderate	Medium
Vegetation Removal	Removal of Hedges	Terestrial Ecology	Lizard & Bird Habitat destruction/fragmentation, animal mortality	Project Manager	Unlikely	Moderate	Medium	Lizard Management Plan (LMP) Avian Management Plan (AMP)	Rare	Moderate	Low
	Removal of Trees		Bat & Bird Habitat destruction/fragmentation, animal mortality		Unlikely	Moderate	Medium	Bat Management Plan (BMP) Avian Management Plan (AMP)	Rare	Moderate	Low
General Construction Activities	Fencing & building	Noise and vibration	Generation of nuisance noise and vibration that impacts on neighbouring properties	Project Manager	Possible	Minor	Medium	Construction Environmental Management Plan (CEMP) Construction Noise & Vibration Management Plan (CNVMP)	Unlikely	Minor	Low
	Storage and use of hazardous substances	Terestrial & Aquatic Environment	Release of hazardous substances into the environment with risk of them entering and contaminating either soil or water health or both		Unlikely	Moderate	Medium	Hazardous Substances Management Plan (HSMP) Emergency Spill Response Plan (ESRP)	Unlikely	Moderate	Medium

7 COMMUNICATION

Maintaining good communications is an important consideration for the Project and frequently a "Stakeholder Engagement Plan" (SEP) is mandated by resource consent conditions. If, when resource consent conditions are known, such a requirement is made of the consent holder then the following section will be expanded into a full management plan. The following sections outline how communication associated with the project will be managed.

7.1 Communication Principles

The Project will adopt the following principles in terms of management of communication:

- Early and frequent engagement reduces opposition and builds trust.
- Clear, concise messaging prevents confusion and frustration.
- Transparency about timelines maintains credibility.
- Consistent channels and documentation ensure everyone receives the same information.
- Closing the loop — showing how feedback influenced decisions — is critical for public confidence.

7.2 Pre-construction Communications

The purpose of pre-construction communication will be to build the community's understanding, reduce any anxiety, and prevent misinformation. Pre-construction communication will include:

- Project announcement — high-level overview of purpose, benefits, and timeline.
- What to expect — noise, dust, traffic changes, working hours, and any early enabling works.
- Community engagement — drop-in sessions, online surveys, "what we heard / how we responded" summaries to show responsiveness.
- Contact channels — dedicated email, phone line, project webpage, and sometimes a community liaison person.

7.3 Early Construction Phase Communications

The purpose of early construction phase communication is to set expectations and maintain trust with the community. Early construction phase communication will include:

- Start-of-works notice — exact start date, staging plan, detours, ,travel impacts, and safety messaging.
- Regular updates — monthly bulletins on progress, upcoming disruptions, and completed milestones.
- Traffic management updates — maps, detour explanations, and timing of closures.
- Site signage — clear, simple boards explaining the project and contact details.

7.4 Ongoing Construction Communications

The purpose of ongoing construction communications is to keep residents informed, reduce frustration, and manage disruptions. This phase of communication will include:

- Progress updates — milestones reached, upcoming works, changes to schedule.
- Issue-specific alerts — water shutoffs, driveway access interruptions, night works, vibration-intensive activities.
- Responsive communication — answering community questions promptly; publishing FAQs.
- Transparency about delays — honest explanations of weather impacts, supply issues, or design changes.
- Documentation of feedback — showing how community input influenced decisions.

7.5 Near-Completion Communications

The purpose of near completion communications is to prepare the community for transition back to normal. This phase of communication will include:

- Final works notice — resurfacing, landscaping, commissioning, line marking, or final inspections.
- Removal of detours — dates for reopening roads, footpaths, or facilities.
- Safety reminders — avoiding newly laid surfaces, respecting barriers, etc.

7.6 Completion & Close-Out Communications

The purpose of completion and close-out communication is to demonstrate accountability and celebrate community investment. This phase of communication will include:

- Project completion announcement — outcomes, benefits, and acknowledgements.
- Before/after visuals — photos or videos showing improvements.
- Community thank-you — recognising patience and cooperation.
- Post-construction evaluation — satisfaction surveys, lessons learned, and performance metrics.

7.7 Typical Communication Channels Used

Multiple communications channels will be utilised, including:

- Project website or dashboard
- Email newsletters
- Social media updates
- Letterbox flyers and door-knocking for high-impact works
- On-site signage and variable message boards
- Community meetings, drop-ins, and pop-ups
- Local media releases
- SMS alerts for critical disruptions

7.8 Notifications to Council

The Project will be required to make notifications to WDC/WRC at specific times during the completion of construction activities. The exact nature and timing of these notifications will be finalised in resource consent conditions when they are finally issued. In the absence of these conditions this CEMP cannot specify the exact requires. It is usual that the notifications are segregated into pre-construction, during construction and post construction.

8 TRAINING & EDUCATION

A well-crafted training and education programme is essential to making this, and all of the environmentally focused management plans, effective. Its success relies on staff clearly understanding their roles, responsibilities, and the environmental challenges, risks, and objectives that shape daily operations. By ensuring personnel are informed, capable, and aligned with project goals, the training and education programme functions as a cohesive, proactive framework that consistently drives safe, compliant, and environmentally responsible performance.

8.1 Induction

All personnel will complete an environmental induction prior to commencing work on site. The induction will provide an overview of project-specific environmental risks, consent requirements, and the environmental controls implemented to manage potential effects. Topics will include erosion and sediment control measures, stormwater management, spill prevention and response, waste management, protection of environmentally sensitive areas, incident reporting procedures, and individual environmental responsibilities. Workers will be made aware of designated no-go areas, emergency response requirements, and the consequences of non-compliance. Refresher inductions and toolbox talks will be undertaken as required to communicate environmental updates, emerging risks, and lessons learnt (Refer **Table 10**).

Table 10: Environmental Management Induction Topics

Environmental Responsibilities

- Environmental policy and project environmental objectives.
- Individual responsibilities and reporting requirements.
- Stop work and escalation procedures for environmental incidents.

Key Environmental Risks

- Erosion and sediment control measures.
- Stormwater management requirements.
- Dust, noise, and vibration controls.
- Protection of watercourses, wetlands, and sensitive habitats.
- Hazardous substances and contamination risks.

Environmental Controls

- Sediment retention ponds, decanting earth bunds, stabilised entrances.
- Refuelling and maintenance requirements.
- Spill prevention and spill response procedures.
- Waste segregation, recycling, and disposal requirements.
- Concrete washout and dewatering controls.

Protected Areas

- No-go zones and environmentally sensitive areas.
- Significant vegetation, waterways, ecological habitats, and heritage sites.
- Site access restrictions and vehicle movement controls.

Incident Reporting

- Environmental incidents, near misses, and non-conformances.
- Pollution events and spill reporting procedures.
- Notification requirements and emergency contacts.

Monitoring and Compliance

- Consent conditions and permit requirements.
- Daily inspections and housekeeping expectations.
- Environmental audit and compliance processes.

8.2 Environmental Training

Personnel who are required to perform certain tasks or roles will be required to complete environmental training (refer **Table 11**)

Table 11: Environmental Training

Type of Training	Purpose	Convenor	Attendees
Project Staff Induction	Induct new staff to the Project, providing a general overview to the environmental values, risks, stakeholders, sensitive receptors and contacts for the Project as well as cultural history and significance of the area. Induction will highlight environmental monitoring requirements for all. Emphasis will be placed on requirements around housekeeping and the need to keep construction areas in a tidy condition. Induction training will also make construction team aware of resource consent conditions, designation conditions, environmental control procedures.	Project Manager	All staff and visitors
	Construction team members with environmental responsibilities may also require the following training: • Environmental Emergency response training • Spill response training • Environmental inspections; and monitoring	Environmental Advisor	Construction workers and supervisors
Contaminated land training	Train staff on the CLMP and ASSMP and the associated procedures relating to the management of contaminated land and acid sulfate soils including how to identify and respond to any accidental discoveries. Information pertaining to contaminated and acid sulfate soils will be included in toolbox talks and will be included as a hazard on site hazard boards. The control mitigation measures relate only to the hazards associated with the HAIL activities identified across the Project.	Suitably Qualified Contaminated Land Specialist	Construction workers and supervisors
Erosion and Sediment Training	Training content will be targeted at the most relevant information for various staff roles. All training will include awareness of the activities and associated effects that earthworks can have on the local receiving environments, including an overview of the values of those environments. Training will also ensure that all staff understand what ESC measures are, the function of those measures, and the importance of diligently complying with SSESCPs. Training will ensure that staff understand the ESC management structure, and how to report on any maintenance requirements they identify during their work. It will also address the legal responsibilities of all personnel and legal consequences of non-compliance.	Environmental Advisor	Construction workers, supervisors and engineers
	More specific training will be provided to staff that will be involved in the day-to-day implementation of ESC	Environmental Advisor	Construction workers,

	measures. This will include on-the-ground practical training on the construction, maintenance and decommissioning of devices.		supervisors and engineers
Toolbox Talks/ Daily Pre-Starts	Highlight site and activity specific construction procedures and requirements. Discuss environmental management and monitoring requirements for the day. Share environmental lessons learned across the Construction Industry.	Environmental Advisor	Construction workers, supervisors and engineers

9 COMPLAINTS MANAGEMENT

Complaints may be referred to the Project by WDC, WRC, or members of the public. Members of the public who provide a complaint directly to the Project will be able to use the contact telephone number listed on information boards/signs about the Project boundary.

9.1 Responsibilities

9.1.1 Project Manager

The Project Manager is responsible for ensuring that:

- All complaints are responded to and followed up.
- Suitably trained, experienced, qualified, and resourced personnel are always available to respond to complaints including after hours and on weekends when complaints could be received.
- Both the WDC and WRC are updated regarding complaint receipt, responses and progress on resolution.
- A complaints register is maintained.
- Complaints are investigated, corrective actions undertaken and documented, and any lessons learnt are shared.

9.1.2 On-call Staff

The on-call staff are responsible for

- Visiting the area in question and then implementing mitigation and corrective measures where it is deemed necessary and in accordance with direction from the Project Manager.
- Providing regular updates regarding the situation to the Project Manager.

9.1.3 Complaint Register

A register of all complaints will be maintained by the Project. The Register will identify the following information:

- A unique number for each complaint.
- Date and time the complaint was originally made.
- Name and contact details of the person to whom the complaint was originally made.
- Name and contact details of the person(s) making the complaint.
- A description of the complaint.
- Date and time the complaint was received by a member of the Project team.
- Name and contact details of the person(s) tasked by the Project Manager with addressing the complaint.
- A description of the corrective actions assigned and the time frame for addressing the actions.
- Date and time the corrective actions were completed.
- Date and time the person(s) making the complaint were notified of the completion of the corrective actions.

9.2 Complaint Initial Action

Responding to complaints and initiating mitigation measures, where actions are required, will take place as soon as possible. The Project staff member responding will record the following information:

- Time/date and location.
- Identity and contact details of complainant.
- Weather conditions (including wind direction and strength).
- Nature of the complaint (e.g. noise, dust, vibration, odour etc).

- Confirmation of the issue (can it be seen, heard, smelt, or felt).
- Evidence be collected to validated/verify the complaint (recordings, photos, video, samples)
- Characteristics of the issue (e.g. is the issue occurring constantly or intermittently, how long has it been an issue, can the source on the issue be confirmed).
- What construction related activities are being undertaken and at what distance from the complainant.
- Who is responsible for the construction activity.
- What, if any, mitigation measures/strategies are being employed by the construction staff associated with the activity.
- What mitigation/corrective action(s) have been initiated.
- What feedback/updates have been provided to the complaint.

9.3 Complaint Investigation

The Project Manager will advise the WDC/WRC as soon as practical of the outcome of an investigation including:

- The specifics of the issue being investigated.
- The cause of the issue.
- What actions were taken to remedy the issue.
- What management and operational measures were changed/upgraded/improved to ensure that the issue did not occur again or was less likely to occur.
- What actions were taken to communicate the outcome of the investigation with the complainant, project staff, sub-contractors, and key stakeholders.

10 COMPLIANCE MANAGEMENT

The Project Team will monitor compliance against the conditions of consent. A copy of all granted/issued regulatory permissions (resource consents, discharge permits, wildlife permits, archaeological authorities) will be maintained on site along with copies of all authorised/certified management plans.

When issued, resource consent conditions will specify monitoring regimes and discharge standards. The following undertakings are meant to act as indictors and will be amended to reflect resource consent conditions when they are known.

10.1 Routine Internal Inspections

The PM will ensure that weekly monitoring is undertaken by a suitably qualified and experienced person (SQEP) to assess the effectiveness of environmental controls including but limited to performance against the following management plans:

- Erosion & Sediment Control Plan (including Chemical Treatment Plan (CTP)) and site specific ESCPs.
- Contaminated Site Management Plan (CSMP)
- Acid Sulfate Soils Management Plan (ASSMP)
- Construction Noise & Vibration Management Plan (CNVMP) and site specific CNVMPs.
- Hazardous Substances Management Plan (HSMP)
- Ecology related management plans (Bat, Lizard, Avian, and Fish MPs)

10.2 Biannual Audits

Twice yearly during the period of construction a full audit of the commitments made in every management plan will be undertaken seeking to evaluate performance against all the conditions of the regulatory permissions (resource consents, discharge permits, wildlife permits, archaeological authorities).

10.3 Records and Reporting

All monitoring inspections and audit findings will be recorded in writing, including:

- Date and time of monitoring.
- Weather conditions.
- Construction activities underway
- Details of any non-complying activities or circumstances, including monitoring observations (photos, videos, measurements, samples, etc).
- Any corrective actions identified and to whom they were assigned/delegated and when the corrective action is to be completed by.

- Which regulatory permission (resource consents, discharge permits, wildlife permits, archaeological authorities) condition , or management plan commitment that was not complied with.

Monitoring records will be provided to the WDC/WRC upon request and retained on site for the duration of the works.

10.4 Investigations involving incidents of non-compliance

The PM will ensure that where non-compliances are identified they are corrected and where it is significant then an investigation is undertaken to establish why and how it happened together with identifying actions that will prevent it from happening again in the future.

Significant events include, but are not limited to:

- Discharge of dust across the property boundary that resulted in a complaint being received.
- Discharge of water that is sediment laden and/or has a high (>8.5) or low pH (<5.5) into a watercourse or wetland.
- Construction noise and/or vibration occurrence that resulted in a complaint being received.
- The removal of environmental controls with written permission from either WDC/WRC.
- Failure to adhere to protocols associated with the accidental discovery of wildlife, contamination, archaeological artefacts and /or koiwi.
- Failure to adhere to protocols associated with vegetation removal.
- Failure to store, handle, or use hazardous substances in accordance with the HSMP.
- Releases (spill, leak, discharge) of a hazardous substance into the environment.
- Instances of wilful and deliberate non-compliance.

10.5 Winter Works

Only approved earthworks can be undertaken between 1st of May and 30th of September each year. Unless written approval of a winter works application is received from the WRC then all areas where earthworks have been undertaken shall be stabilised prior to 1st of May each year and be maintained in a stabilised state until at least 30th of September each year. The stabilised surface will be maintained in accordance with the ESCP.

Otherwise without written approval to complete earthworks during winter then no earthworks authorised by this consent, other than those necessary for the maintenance of erosion and sediment controls, shall take place during the period of 1st of May to 30th of September inclusive each year.

10.6 Decommissioning of Environmental Controls

The Project Manager will not authorise the removal or decommissioning of any environmental controls until permission to do has been received in writing from either the WDC/WRC w, whomever has jurisdiction to approve.

In the case of sediment controls the contributing catchment must be completely stabilised. The Project Manager will submit in writing to WRC notice of the intent to remove sediment controls prior to their removal or decommissioning. Written notice must include evidence of stabilisation and be signed off by SQEP confirming that the contributing catchment for the erosion or sediment control measure is completely stabilised. Written approval from WRC is required before any controls are removed.

11 MANAGEMENT PLAN REVIEW

11.1 Plan Review and Updates

Amendments to the CEMP can be made., however these changes cannot be made without the oversight and involvement of the WDC and WRC.

11.2 Review Triggers

Review of the CEMP can be triggered by various mechanisms that include:

1. Changes to construction methodology:
   - Any modification to staging, earthworks volumes, dewatering approach, haul roads, or work areas that alters environmental risk.

2. Discovery of unexpected environmental conditions:
   - Contaminated soil
   - Asbestos
   - Archaeological artefacts/koiwi
   - Protected fauna (bats, lizards, fish, birds)
   - Acid sulfate soils

3. Environmental incidents or near misses:
   - Spills, sediment discharges, dust events, noise exceedances, or complaints that indicate controls are not effective.

4. Monitoring exceedances, any breach of thresholds for:
   - Turbidity, pH, hydrocarbons in discharge water
   - Dust
   - Noise/vibration limits
   - Groundwater drawdown

5. Changes to regulatory requirements
   - New or amended resource consent conditions
   - Updated designation conditions
   - New wildlife permits or archaeological authority conditions.

6. Changes in project scope or design
   - Realignments, additional work areas, new borrow pits, changes to stormwater design, or new structures.

7. Seasonal or weather-related triggers
   - Onset of wet season
   - Major storm events
   - Flooding or high groundwater

8. Contractor or personnel changes
   - New subcontractors, changes in environmental roles, or changes in competencies may require updates to responsibilities and procedures.

11.3 Update Process

Any changes to the CEMP need to be submitted to the WDC/WRC for review. Until such time as written approval is received from both Councils on any proposed amendments the existing management plan commitments will remain in effect.

11.4 Certification

WDC/WRC certification will be received in writing.

12 REPORT LIMITATIONS

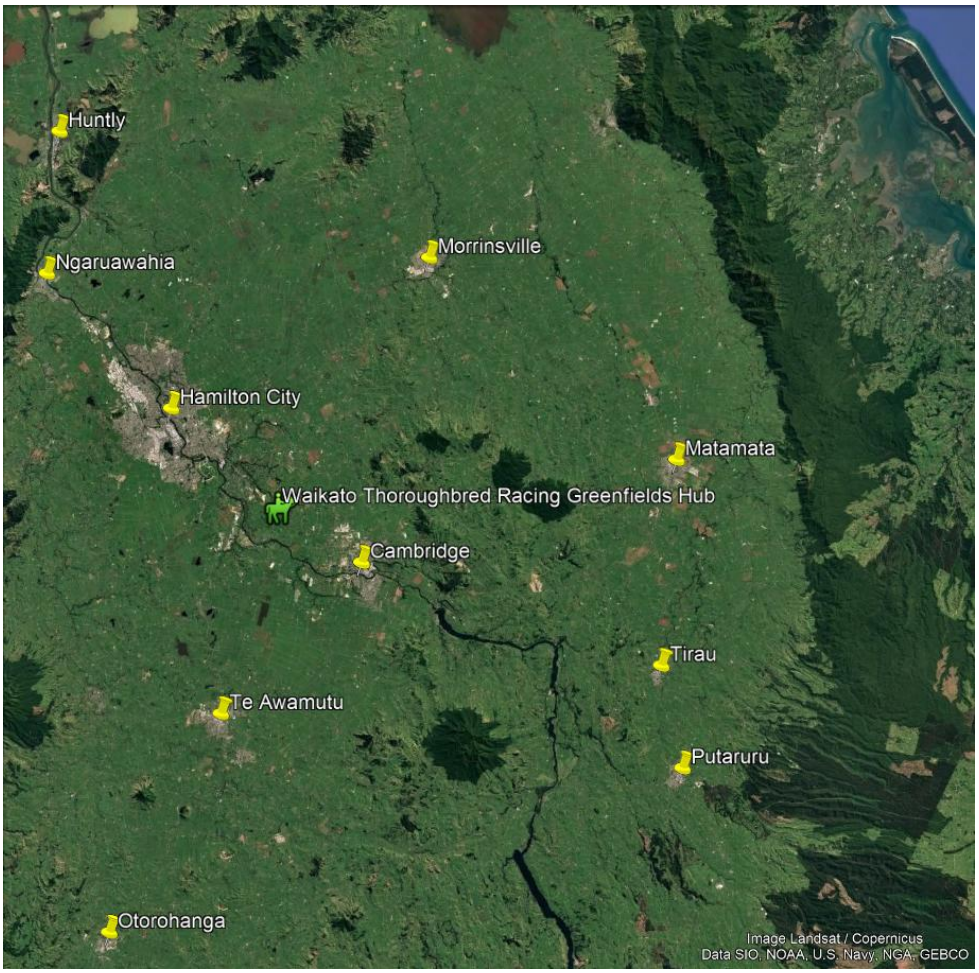
This report has been prepared for our client for their purposes and the regulatory authority in relation to the consent application within the scope of this report. It is based on our understanding of the proposed development. Should any changes to the nature of the development occur, BCD should be asked to provide comment on the ongoing applicability of recommendations made in this report. It is not to be relied upon or used out of context by any other person without reference to BCD Group Ltd. The reliance by other parties on the information or opinions contained in this report shall, without prior review and agreement in writing, be at such parties' sole risk. To avoid misinterpreting this report, we recommend that the assistance of ESC professionals familiar with the project and scope of this report is maintained.

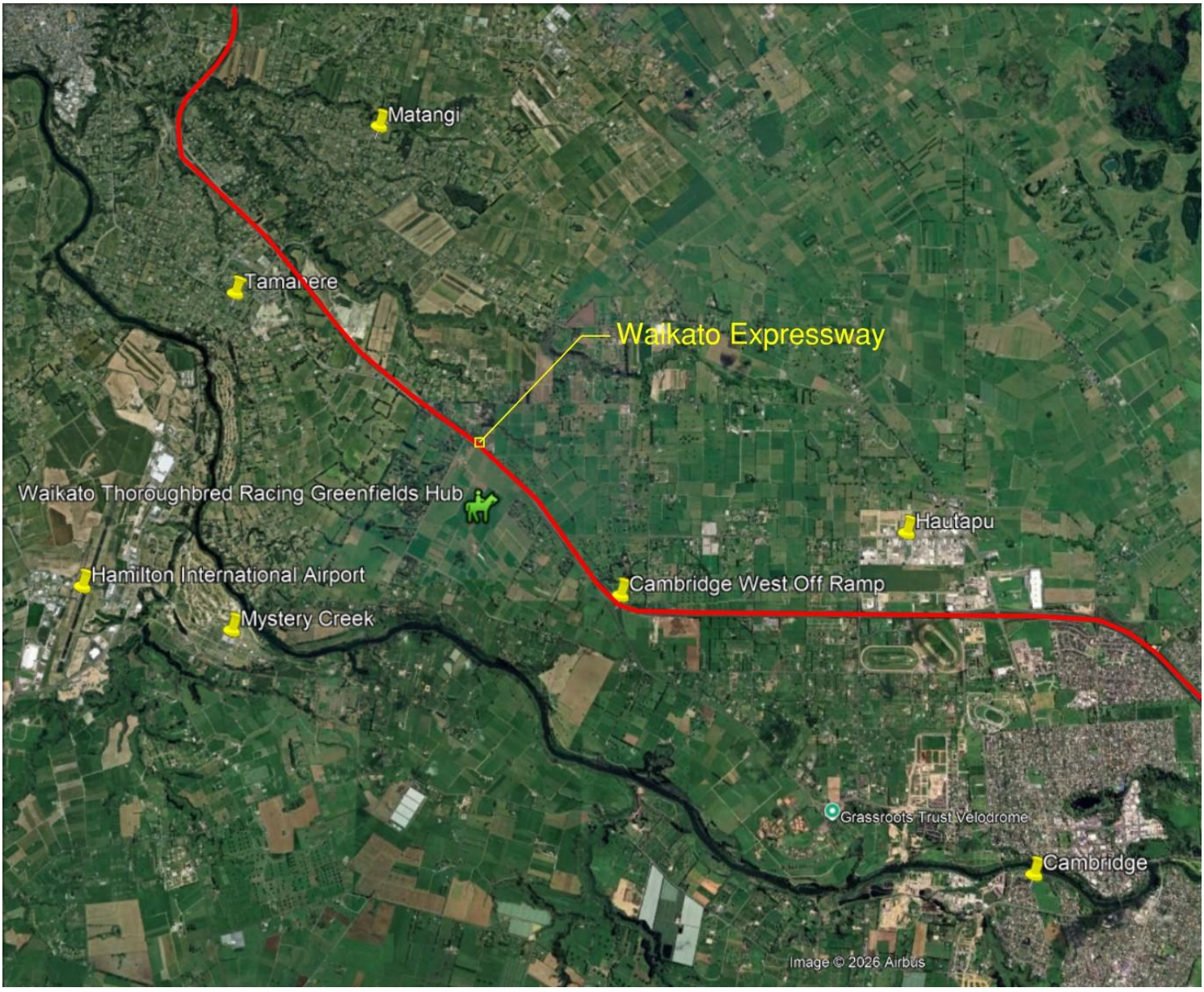
This report covers erosion and sediment control considerations only. We recommend the proposed works be checked against current District and Regional Council plans or checked by a registered planner.

Appendix A

Location of Development Site


Waikato Thoroughbred Racing Greenfields Hub
Image Landsat / Copernicus
Data SIO, NOAA, U.S. Navy, NGA, GEBCO


Huntly
Ngaruawahia
Morrinsville
Hamilton City
Matamata
Waikato Thoroughbred Racing Greenfields Hub
Cambridge
Tirau
Te Awamutu
Putaruru
Otorohanga
Image Landsat / Copernicus
Data SIO, NOAA, U.S. Navy, NGA, GEBCO


Matangi
Tamahere
Waikato Expressway
Waikato Thoroughbred Racing Greenfields Hub
Hautapu
Hamilton International Airport
Cambridge West Off Ramp
Mystery Creek
Grassroots Trust Velodrome
Cambridge
Image © 2026 Airbus

Appendix B

Master plan of Development Site

(Refer Appendix M: Architectural Masterplan and Drawings – Fast-track Substantive Application Planning Assessment – Overall Summary)