Contaminated Site Management Plan

JOB NUMBER: 23-1883

Waikato Greenfield Racing Hub

PROJECT

Waikato Thoroughbred Racing Inc

CLIENT

Substantive – Rev 0
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23-1883 Waikato Greenfield Racing Hub



Prepared for: Waikato Thoroughbred Racing Inc Project No: 23-1883

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1 INTRODUCTION

1.1 Background

Waikato Thoroughbred Racing Inc (WTR) has engaged BCD Group (BCD) to prepare a site-wide contaminated site management plan (CSMP) for the proposed development properties at Hooker Road, Duncan Road and Pencarrow Road, Tamahere, Waikato (the Site). The Site location is shown in **Appendix A**.

A previous investigation (BCD Group, 2026) identified activities on the Hazardous Activities and Industries List (HAIL) which are ongoing or have occurred at the Site. These activities are consistent with the use of the Site as a farm. This PSI was submitted to support a referral to the Fast Track consenting process.

As activities regulated under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (2011) (NES CS) are proposed for the Site, activities on the HAIL have been identified at the Site, and areas of the Site have been identified as a "Piece of Land", a resource consent under the NES CS will be required.

To support this consent, a CSMP should be prepared to demonstrate that risks to human and environmental health can be managed. This would include outlining how investigations would be undertaken to quantify the potential risk, as well as management measures for soils at the Site.

Feedback from Waikato Regional Council (WRC) on the referral application advised that they agreed with the conclusions of the investigation and supports the preparation of a contaminated site management plan, including a targeted investigation of identified areas to inform management and remedial measures to manage risks to human and environmental health as part of a substantive application. This plan will be updated as design details are confirmed and investigations at the Site are undertaken

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.

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 senior living community, a village centre and a bloodstock sales precinct.

Masterplans for the Site are included in **Appendix B**. This plan shows:

- A main track, backtrack, warmup track and harness track
- Stabling and support areas for events
- Carparking
- Commercial and residential development
- Irrigation ponds

Earthworks across the Site will be required for:

- Excavation of the irrigation pond
- Stripping of topsoil and levelling of the Site
- Recontouring of the Site
- Demolition of existing structures at the Site
- Construction of foundations
- Development of roads and other surface infrastructure
- Development of subsurface infrastructure.

Earthworks depths, staging and excavation methodology are currently unknown. Preliminary estimates indicate that approximately 518,500 m³ of soil will be disturbed during topsoil stripping, with a further 406,434 m³ of cut generated. Approximately 538,187 m³ of fill will then be placed across the Site. These quantities describe different components of the preliminary earthworks model and should not be treated as a reconciled soil balance until the design, sequencing, reuse and disposal assumptions are confirmed.

This would provide a shape that then requires pavement construction, building and foundation construction and topsoil spreading (modelled at 400 mm deep, and reusing approximately 331,196 m^3 of the stripped topsoil).

These volumes do not include temporary site works, service trenching or additional excavation where unsuitable material is encountered. A maximum cut depth of 6 m is currently proposed for construction of a swale, and a maximum fill depth of 6.7 m is proposed for infilling the effluent ponds. Across most of the Site, cut is proposed to extend to approximately 1.5–2.0 m bgl.

The final site cover will vary across the Site and will include racetrack, grassed areas and impermeable surfaces. In addition to earthworks, changes of land use and subdivision of the Site will occur as part of the redevelopment.

1.2 Purpose and scope

The purpose of this Management Plan is to provide a framework for assessing the risk from contaminants at the Site via soil sampling investigations, and to provide appropriate soil management procedures to implement during works at the Site to manage risks to human and environmental health.

1.3 Assumptions

The following assumptions were made during this report:

- Information obtained by Waikato Thoroughbred Racing and any third parties is complete and accurate
- The observations made during this investigation are representative of the activities that have occurred or are occurring within or adjacent to the Site
- The observed and inferred conditions are representative of the actual conditions associated with HAIL sites and / or other sites not directly assessed
- That the future land use of the site will be commercial/industrial and residential. The relevant guideline values for those land uses have therefore been adopted for assessment.

1.4 Use of this management plan

Table 1 provides a breakdown of the stages of a project, and how this management plan supports the works at each stage:

Table 1 Use of this plan

Revision	Management plan role
For consent	• This management plan has been prepared to demonstrate effects from the disturbance of potentially contaminated soils and groundwater at a Site can be managed through the implementation of high-level controls. • This plan will be refined and updated as design details are finalised, including the construction sequencing earthworks details.
For tender	• Plan updated to reflect the conditions of resource consent, completed design elements and proposed construction sequencing • Plan supports engagement of contractors to deliver the construction
For earthworks / construction	• Plan updated to reflect Contractor and Environmental specialist details and finalised design elements.

2 REGULATORY APPLICABILITY

2.1 NES CS Applicability

A Preliminary Site Investigation (PSI) is required under regulation 6(3) of the NES CS to determine whether land is a "piece of land" on which a potentially contaminating activity or industry is, has been, or is more likely than not to have been undertaken. The completed PSI identified areas of the Site that meet this definition.

Based on the findings of the PSI it is more likely than not activities on the HAIL have been undertaken across the Site, which may have impacted the underlying soils. An assessment of the applicability of the NES CS to the Site is outlined in Table 2.

Table 2 NES CS applicability

NES CS requirement	Applicable to the Site?
Are areas of the Site classified as a "piece of land"	Yes – HAIL activities have been identified at the Site.
Activity assessment	
Removing or replacing and underground fuel system	No – no underground fuel system has been identified at the Site
Soil sampling	Yes – soil assessment will be undertaken as part of future work at the Site
Disturbing the soil	Yes – earthworks will be occurring across the Site
Subdividing the land	Yes – subdivision of the property will occur during the development
Change of land use	Yes – the property is being converted from production land (agricultural) into a commercial / industrial and residential development.

Based on this assessment the NES CS applies to works at the Site. The potential effects of these can be managed via the implementation of the investigation and management practices outlined in this plan.

2.2 Regional and District Plan

Section 5.3 of the Waikato Regional Plan concerns contaminated land in the Waikato Region. Rules 5.3.4.6 to 5.3.4.8 relate to discharges arising from the remediation of contaminated land. The requirements of these rules can be met via the implementation of this management plan.

No other contaminated land specific rules were identified for the Site during the PSI.

2.3 Health and Safety at Work Act (Asbestos) Regulations (2016)

Asbestos has been identified as a potential contaminant at the Site, especially in the farm dump. Laboratory testing ahead of the redevelopment of the Site will assess if these Regulations apply to the Site, licencing requirements for asbestos related work, and recommend appropriate precautions such as personal protective equipment, earthworks monitoring and waste disposal.

3 ROLES AND RESPONSIBILITIES

3.1 Roles and Responsibilities

Table 3 outlines the responsibilities of parties undertaking works at the Waikato Thoroughbreds Site. A record of the responsible parties should be kept including the works and dates of their engagement at the Site.

Table 3 Site Roles and Responsibilities

Position	Contact Name and Company	Responsibilities and relevant section
Consent holder	Waikato Thoroughbred Racing Inc	• Appointing the project manager and environmental specialist • Ensure that the project is adequately resourced to ensure compliance with this CSMP
Project Manager	TBD	• Appointing the site manager / supervisor • Project reporting (Section 7.1) • Record keeping for the Site (Section 7.2) • Implementation of the sampling programme (Section 8) • Implement the site wide earthworks management protocols (Section 9) • Implementation of health and safety requirements (Section 10) • Contacting regulatory authorities following an unexpected contamination discovery (Section 12) • Implementation of the contamination discovery protocols (Section 12) • Implementation of dewatering, asbestos and air quality monitoring (Sections 13, 14, 15)
Environmental specialist	TBD	• Act as a suitably qualified and experienced person (SQEP) as per the requirements of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (2011) (Section 7, 8, 11, 12, 13, 14, 15, 16 17). • Project Reporting (Section 7.1) • Advising the Project Manager on the sampling requirements for the Site (Section 8). • Providing recommendations following an unexpected contamination incident (Section 12) • Recommending controls for other environmental requirements for the Site (Sections 8, 13, 14, 15)

Works at the Site will be undertaken in accordance with the Health and Safety at Work Act 2015 and the Resource Management Act 1991 (and replacement legislation). All site workers must be briefed on the contents of this CSMP before commencing work on-site. The briefing must explain the potential for asbestos contamination, the locations where asbestos may be encountered, and the controls to be implemented if suspected asbestos-containing material is identified.

4 SITE SETTING

4.1 Site identification

Table 4 Site identification

Attribute	Details
Address and legal description	37 Hooker Road and 38 Duncan Road, Tamahere, Hamilton Section 2 SO 547526 [RT 1027516] 696,678 m^2 90 Duncan Road, Tamahere, Hamilton Lot 2 DP 16925 [RT SA383/181] 142,120 m^2 536 Pencarrow Road, Tamahere, Hamilton Lot 2 DP 471383 [RT 650204] 185,194 m^2 592 Pencarrow Road, Tamahere, Hamilton Lot 1 DP 471383 [RT 650205] 238,694 m^2 636 Pencarrow Road, Tamahere, Hamilton, Section 49 SO 457609 [RT: 632409] 376,439 m^2 644 Pencarrow Road, Tamahere, Hamilton Section 46 SO 457609 [RT 632392] 13,550 m^2
Site Area	Approximately 1,655,000 m^2 (165.6 ha)
Current site use	Farming
Proposed future site use	The development, a mixture of commercial / industrial and residential land uses.

4.2 Site details

Site details are included in Table 5.

Table 5 Site details

Attribute	Details
Elevation and topography	The site has generally level contours, with steeper slope angles towards the western boundary. The western side of the site has a hill sloping down to the east, with contours ranging between 60 m and 53 m RL (NZVD2016). The southeastern corner of the site is also slightly elevated at 56.9 m RL
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.
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.
Hydrology	An unnamed stream is located in the base of a gully approximately 400 m to the north of the Site. The Waikato River is approximately 500 m to the south of the Site. Within the Site multiple stormwater drains run along the paddock boundaries. Due to the topography surface water flows into these drains, before leaving the Site to the north.
Hydrogeology	Groundwater was identified at between 0.9 – 2.3 m bgl across the Site during geotechnical investigations. Groundwater measurements taken during this investigation indicate that the shallow groundwater underlying the Site flows towards the north.

5 SUMMARY OF CONTAMINANT CONDITIONS

5.1 Waikato Thoroughbred Racing, Preliminary Site Investigation Report (BCD Group 2026)

To support the Fast Track referral application BCD undertook a preliminary site investigation for the Site (BCD Group, 2026).

A desktop assessment was undertaken which identified eight locations where HAIL activities had occurred. It also identified several activities which may have impacted the soils underlying the Site. These are discussed in Section 5.2.

A benchmarking assessment of the top 1.0 m of soils was undertaken in areas where farming had occurred, away from the areas where activities on the HAIL may have impacted soils. A total of 42 samples were collected from 14 locations. Samples were analysed for a suite of metals and organochlorine pesticides.

Samples were assessed against commercial / industrial and rural residential health criteria, background concentrations and selected disposal criteria. One sampling location exceeded the rural residential guidelines. This sample was vertically delineated but not horizontally delineated. Three locations exceeded the adopted background concentrations, and one location exceeded the Waikato Cleanfill acceptance criteria. A conceptual site model for the Site was developed and is included in Section 5.3.

5.2 Identified contaminating activities

HAIL activities identified as “more likely than not”: to have occurred at the Site are outlined in Table 6. Each of these locations have been given a separate identification number. A map showing these locations is included in **Appendix C**. Associated contaminants of concern have been sourced from the Hazardous Activities and Industries List guidance Identifying HAIL land (Ministry for the Environment, 2023)

Table 6 Identified HAIL activities

HAIL ID	Activity description	HAIL classification	Associated contaminants of concern	Discussion
01	Farm dump located in Paddock 36 of the Duncan property	G3 – Landfill sites	Metals, hydrocarbons, asbestos, OCP and semi-volatile organic compounds	A farm dump has been identified in paddock 36 of the Duncan farm. The impacts of this have not been assessed.
02	Storage shed and fuel tanks	A1 – Agrichemicals, including commercial premises used by spray contractors for filling, storing or washing out tanks for agrichemical application A17 – storage tanks or drums for fuel, chemicals or liquid wastes	Metals, hydrocarbons	The shed at the Site is used for agrichemical storage. In addition, an above ground storage tank is located beside the shed, and has historically been located adjacent
03	Vehicle shed	A1 – Agrichemicals, including commercial premises used by spray contractors for filling, storing or washing out tanks for agrichemical application A17 – storage tanks or drums for fuel, chemicals or liquid wastes A18 – Wood treatment or preservation including the commercial use of antisapstain chemicals during milling, or bulk storage of treated timber outside.	Metals, hydrocarbons	The workshop at the Site is used for the storage of agrichemicals, as well as the AST located adjacent to the shed and storage of treated timber piles.
04	Offal pit	G3 – Landfill sites	Metals, hydrocarbons, asbestos	Offal pits have been identified at the Site. While these have primarily been used for the disposal of animal carcasses, there is the potential that non-animal waste has been disposed of here.
05	Offal pit	G3 – Landfill sites	Metals, hydrocarbons, asbestos	Offal pits have been identified at the Site. While these have primarily been used for the disposal of animal carcasses, there is the potential that non-animal waste has been disposed of here.

06	Offal pit	G3 – Landfill sites	Metals, hydrocarbons, asbestos	Offal pits have been identified at the Site. While these have primarily been used for the disposal of animal carcasses, there is the potential that non-animal waste has been disposed of here.
07	Fuel storage tanks	A17 – storage tanks or drums for fuel, chemicals or liquid wastes	Hydrocarbons	The use of hydrocarbons on the Site may have impacted the underlying soils.
08	Burn pile	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	Metals, PAH	Impacts from the fire may have impacted the soils underlying the burn pile

In addition to the HAIL activities at the Site, non-HAIL activities which may have impacted soils at the Site should also be considered. These are outlined in Table 7.

Table 7 Potentially impacting activities

Activity	Release mechanism	Associated contaminants of concern	Discussion
Building fabric with potentially asbestos containing material	Potentially asbestos containing material was identified on the walls and eaves in the buildings at the Site	Asbestos	Due to the age of the buildings at the Site asbestos may be present in the building fabric of existing and demolished buildings at the Site.
Painted metals, treated timber, galvanised building fabric	Weathering of building materials such as paint, treated timber, and galvanised metals.	Metals, including arsenic, lead, zinc, copper, chromium	Building fabric may be impacting the soils at the Site.
Superphosphate application	The Site may have been subject to the application of superphosphate fertilisers	Cadmium, DDT	Based on the high-level soil sampling programme impacts from cadmium or DDT were not observed in the soil at the Site.
Effluent discharges	Effluent has been applied to the soils at the Site.	Nitrates, e.coli	Nitrates and e.coli are unlikely to impact the health of workers at the Site, especially if PPE is in place while undertaking work at the Site. However, if dewatering is required for works at the Site further assessment should be undertaken to quantify the potential risk from the dewatering.

5.3 Conceptual site model

The current conceptual site model (CSM) for the Site is included in Table 8. The conceptual site model outlines the potential source – pathway – receptor (SPR) linkages which may be present at the Site and an assessment as to the completeness of that linkage. A risk is only present if there is a complete SPR linkage.

This CSM will be updated as investigations are undertaken at the Site.

Table 8 Conceptual site model

Source	Contaminants of concern	Pathway	Receptors	Discussion	Complete SPR?
Impacted soil from HAIL and other potentially impacting activities undertaken at the Site	Metals	Ingestion and dermal contact Migration of contaminants from soil into water or groundwater	Site workers	Site workers may come into direct contact with soils at site during excavation works. Implementation of PPE and worker hygiene procedures will assist in protecting from this.	Potentially complete
			Future site users	Future site users may encounter impacted soils when visiting the site or ingesting food grown at the Site or groundwater extracted from the Site.	Potentially complete
			Onsite ecological receptors	Ecological receptors may ingest impacted soil through eating grass or other food spread on the ground or ingest groundwater extracted from the Site.	Potentially complete
			Receiving environment	Contaminants mobilised from soil may be transported in sediment-laden runoff to surface water receptors or may leach through the soil profile into shallow groundwater.	Potentially complete
	Hydrocarbons / semi-volatile organic compounds	Ingestion and dermal contact Migration of contaminants from soil into water or groundwater Inhalation	Site workers	Site workers may come into direct contact with soils at site during excavation works. Implementation of PPE and worker hygiene procedures will assist in protecting from this. If hydrocarbon vapours are present at the Site these may collect in excavations or otherwise expose workers to potential risk.	Potentially complete
			Future site users	Future site users may encounter impacted soils when visiting the site or ingesting food grown at the Site, groundwater extracted from the Site or from hydrocarbon vapours.	Potentially complete
			Onsite ecological receptors	Ecological receptors may ingest impacted soil through eating grass or other food spread on the ground or ingest groundwater extracted from the Site, or inhalation of hydrocarbon vapours.	Potentially complete
			Receiving environment	Impacted sediment from the Site may enter waterways or percolate through the soil profile into the underlying groundwater.	Potentially complete
	OCP	Ingestion and dermal contact Migration of contaminants from soil into water or groundwater	Site workers	Site workers may come into direct contact with soils at site during excavation works. Implementation of PPE and worker hygiene procedures will assist in protecting from this.	Potentially complete
			Future site users	Future site users may encounter impacted soils when visiting the site or ingesting food grown at the Site or groundwater extracted from the Site.	Potentially complete
			Onsite ecological receptors	Ecological receptors may ingest impacted soil through eating grass or other food spread on the ground or ingest groundwater extracted from the Site.	Potentially complete
			Receiving environment	Impacted sediment from the Site may enter waterways or percolate through the soil profile into the underlying groundwater.	Potentially complete
	Asbestos	Inhalation	Site workers	Site workers may mobilise asbestos during the work and inhale mobilised fibres.	Potentially complete
			Future site users	If asbestos is present in the near surface asbestos fibres may be mobilised.	Potentially complete

5.4 Site wide risk assessment

Information from this previous reporting and the conceptual site model have been combined to identify the potential contamination risk from areas at the Site, outlined in Table 9. These classifications are based on the existing sampling data and should be updated as sampling is undertaken across the WTR Site. As part of an adaptive management process the findings of additional investigations can cause changes in the risk classification for an area (for example, a higher risk site may be changed to lower if sampling shows results at or below background concentrations). This will be used to support future earthworks, or if subdivision / land use changes occur at the Site. If additional land is bought into the project beyond the boundary of the area investigated during the PSI, it will be classified as higher risk until further assessment is undertaken.

Table 9 Risk classification

Risk	Description
Lower	Areas where the soil has been assessed and contaminants are at or below adopted Waikato regional background concentrations. In these locations standard erosion and sediment controls are to be put in place with a protocol for contaminant discovery.
Medium	Areas which have been identified as areas above the background concentrations of contaminants but below applicable human health criteria, or areas where a non-HAIL potentially impacting activity (such as building fabric deterioration or effluent ponds) occurred. Works in these areas can be undertaken under this management plan, with contaminant discovery protocols.
Higher	Areas where soil sampling has identified a specific risk to human health, potential risks to human health such as asbestos, landfilling activities, effluent ponds or yet to be investigated activities on the HAIL.

A map, showing these areas is included in **Appendix D**.

Table 10 shows the classifications at the Site as of the substantive consent application (October 2026). These classifications will change over the life of the development as additional investigations are completed.

Table 10 Current area classifications – substantive application (October 2026).

Area	Classification	Rationale
01 – Farm Dump	Higher risk	An unassessed HAIL activity was identified in this area (BCD PSI (2026))
02 – Storage shed and fuel tanks		
03 – Vehicle shed		
04 – Offal pit		
05 – Offal Pit		
06 – Offal Pit		
07 – Fuel storage tanks		
08 – Burn pile		
09 – Central buildings	Medium risk	Building fabric and the effluent pond in this area may have impacted the soils underlying the location (BCD PSI (2026)).
10 – Northern buildings		
11 – Farm buildings		Building fabric may have impacted the soils in this location (BCD PSI (2026)).
12 – Farm house		
13 – Farm house		
14 – Sampling around HA 06		Exceedances of Waikato Background Concentrations were identified during sampling. Human health criteria were not exceeded. (BCD PSI (2026))
15 – Sampling around HA 08		
16 – Sampling around HA 12		Exceedances of Waikato Background Concentrations were identified during sampling. Adopted rural residential criteria were exceeded for arsenic, but commercial / industrial criteria were not exceeded. (BCD PSI (2026))
17 – Remainder of the Site	Lower risk	No HAIL activities have been identified in this area and screening sampling has not identified exceedances of Waikato Background Concentrations (BCD PSI (2026))

5.5 Applicability of management plans

5.5.1 Change in land use / subdivision

The PSI undertaken at the Site has identified the "pieces of land" where the activities on the HAIL have occurred at the Site.

Historical farming may have included superphosphate fertiliser application and organochlorine pesticide use. Superphosphate application may contribute cadmium, while historical organochlorine pesticide use may contribute DDT and related compounds. The high-level soil sampling programme did not identify impacts from cadmium or DDT in the sampled areas of the Site.

Based on this, outside of the areas of HAIL on the Site (the lower risk areas of the Site) it is highly unlikely that there will be a risk to human health if the area is subdivided or a change of land use occurs.

If a change of land use or subdivision is planned for a medium / higher risk area of the Site, soil sampling should be undertaken to assess the potential risk to human health from the activity. This may be undertaken in conjunction with sampling as part of the earthworks programme.

Results from this sampling should be provided to council for approval before the subdivision / change of land use is approved.

5.5.2 Earthworks

When earthworks are undertaken at the Site controls should be implemented based on the risk classification in Table 9. These management protocols are included in Table 11.

Table 11 Summary of management protocols

Control	Lower risk areas	Medium risk areas	Higher risk areas
Emergency contacts details (Section 6)	✓	✓	✓
Site wide record keeping and reporting requirements (Section 7)	✓	✓	✓
Soil sampling required prior to works (Section 8)		✓	✓
Site-wide management protocols (Section 9)		✓	✓
Worker PPE (Section 10)		✓	✓
Onsite reuse / soil disposal (Section 11)	✓	✓	✓
Unexpected contamination discovery protocols (Section 12)	✓	✓	✓
Dewatering controls (if required) (Section 13)			✓
Asbestos controls (if required) (Section 14)			✓
Air quality monitoring (if required) (Section 15)			✓

6 EMERGENCY CONTACTS

Emergency contact details are included in Table 12.

Table 12 Emergency contacts

Agency	Contact number
Fire and emergency, ambulance services	111
National poisons and chemicals information hotline	0800 764 766
Waikato District Council	0800 492 452
Waikato Regional Council	0800 800 401
WorkSafe New Zealand	0800 030 040

7 SITE WIDE RECORD KEEPING AND REPORTING

7.1 Reporting

7.1.1 Project reporting

A Project Report shall be completed following each phase of construction, defined as a discrete piece of work at the Site. The Project Report will provide the phase-specific records required by this CSMP and will support preparation of the Works Completion Report described in Section 16. A Project Report template is included in **Appendix E**.

7.1.2 Council reporting

A report will be compiled annually and provided to WRC / WDC. This will include:

- A description of the works undertaken for the year
- Volumes of soil disturbed, reused onsite and removed from Site (as applicable)
- A copy of all project reports (as discussed in 7.1.1)
- Details of contaminant discovery events, issues and complaints
- A summary of approved updates made to this management plan
- Any additional potentially contaminating activities that have been identified at the Site.
- Updates to the conceptual site model.

7.2 Record keeping

Documents should be sent to the project manager (PM) by the responsible party. The PM is responsible for supplying required documents to the Environmental Specialist as required.

Records in Table 13 should be kept and submitted at the end of any project undertaken at the Site.

Table 13 Record keeping requirements

Requirement	Section	Detail
Soil sampling	8	• Sampling and analysis plan • Reporting of the sampling undertaken
Site-wide management	9	• Implementation of site controls • Stockpile management • Erosion and sediment control and dust controls
HSE	10	• Inductions, health and safety plans, and PPE requirements and training • HSE incidents

Soil movement and management	9, 11	• A map showing where soil disturbance is being undertaken and risk area • Total volumes of soil disturbance (imported fill, retained onsite cut to fill, cut to waste) • Assessment of the existing sampling, and results and how this impacts risks to human and environmental health • Assessment if this existing sampling is sufficient for the works • A map of additional sampling locations to support the earthworks and a list of contaminants of concern. • Validation sampling • Volumes and destination of soils reused on site • Volumes, sources and testing of material imported to Site
Offsite disposal	11	• Volumes of soil to be removed from Site • Agreement of the receiving facility • Times and dates of soil movements offsite • Weighbridge receipts from accepting facility • Transportation requirements of material removed from the Site.
Contaminant discovery	12	• Details of material located (Location, photographs, volumes, nature / characterisation of the contamination) • Procedures to mitigate the contamination • Approval from the Environmental Specialist to continue with works
Incidents and complaints	N/A	The PM will be responsible for keeping a record of any health and safety or environmental incidents, accidents, or complaints related to the work. This will comply with the Construction Environmental Management Plan (CEMP) procedures and be reported in the works closure report.
Asbestos works	14	• Asbestos management or monitoring plans • Notifications to WorkSafe • Results of sampling • Air quality monitoring • Compliance with health and safety requirements • Disposal of material as asbestos contaminated waste • Asbestos clearance certificates
Other monitoring	13, 15	Gas monitoring, asbestos monitoring and dewatering records

The site supervisor shall ensure that records are kept of all excavation and filling works at the site. The Site supervisor shall prepare a detailed site plan showing the final extent and dimensions of the excavations and the final disposal location of material removed. The site plan is to be included in the Project Report.

8 SOIL SAMPLING REQUIREMENTS

The PM, under the advice of the environmental specialist, is responsible for the sampling programme outlined in this section.

Currently the Site is an operational farm. These operations at the Site should cease before additional sampling is undertaken, or an assessment if the ongoing farming activity is likely to have ongoing impacts at the Site made.

8.1 Site risk areas

Sampling requirements are outlined in Table 14 for when earthworks or a subdivision / change in land use are planned in the different risk areas.

Table 14 Soil sampling requirements

Area	Sampling requirements
Lower risk	When earthworks or a subdivision / change in land use are planned in the lower risk areas of the Site additional sampling is not required
Medium risk	A project specific plan for pre-work and post-work sampling developed utilising this CSMP to assess the risk to human health from the change in land use and enable appropriate reuse or disposal of material. Existing soil data may be used to determine supplementary pre-work sampling requirements.
Higher risk	A project specific plan for sampling (including remedial sampling if required) should be developed utilising this CSMP to assess additional risks and regulatory controls from asbestos and higher levels of contaminants in soils. These plans will be developed by a SQEP. Higher levels of PPE and monitoring may be required during the sampling, including but not limited to disposable overalls, respirators, air quality monitoring and washdown procedures. Remediation and validation sampling protocols may be required as part of the earthworks. A SQEP should develop a set of remedial goals and validation sampling protocol before earthworks begin. Sampling results will be provided to WRC as part of the Project Report.

8.2 Soil sampling programme

Soil sampling will be undertaken under the supervision of the environmental specialist, who will act as a SQEP for the sampling programme. Sampling is to be undertaken in general accordance with the requirements of Contaminated Land Management Guidelines (CLMG) No 5 Site investigation (Ministry for the Environment, 2021b) and analysis of soils and reported in general accordance with CLMG No 1 Reporting on contaminated sites in New Zealand (Ministry for the Environment, 2021a).

9 MEDIUM AND HIGHER RISK AREA MANAGEMENT PROTOCOLS

The PM shall ensure that works are undertaken in accordance with the controls in this section.

Table 15 Site wide management protocols

Activity	Recommendations
Prior to commencing work	• All staff involved in the handling of contaminated material must complete a specialist contamination induction and training course. • Confirm a location for offsite disposal and that the facility is certified to take the material. • All erosion and sediment control measures should be in place.
Transportation of material offsite	All trucks used for transporting contaminated material off site should employ covers over the load and their chassis and wheels must be free of debris before leaving the site.
Earthworks (material handling)	• Earthworks involving contaminated material should not, wherever possible, be completed during wet and or windy weather. • Dust management controls should be proactively implemented. • Vehicle and personnel movements in and out of the area involved should be minimised. • Where practicable, soil will be loaded directly onto the vehicle and taken directly to the reuse area or offsite disposal. • Care should be taken not to spill material while loading it onto trucks. • The practice of stockpiling of contaminated material should be kept to a minimum both in terms of its overall frequency and duration. • The size (extent/height/footprint) of stockpiles should be minimised. • Stockpiles should be physically segregated from clean material. • If the material is stockpiled for more than a day ***and*** wet weather is expected/forecast, it should be bunded and be covered by a waterproof geotextile fabric (e.g. polythene). • Use of impervious surfaces should be considered for higher risk situations. • Any rainwater collected during excavation should be diverted into the excavation for soakage to ground.

10 PPE AND WORKER HEALTH AND SAFETY

The PM is responsible for implementing the requirements in this section.

Table 16 PPE requirements

Activity	Recommendations
Prior to commencing work	• All staff involved in the handling of contaminated material must complete a specialist contamination induction and training course covering risks, controls, and discovery protocols. • Staff will be directed to a designated break area intended for the consumption of food and taking a break. Hygiene protocols will be outlined. • A smoking / vaping ban will be in effect.
Personal Protective Equipment (PPE)	• It is assumed that all staff involved in construction activities on site will as a minimum be equipped with the following PPE - steel capped lace up boots, high visibility vest, hard hat with chin strap, and eye protection. • In addition to the PPE requirements for the Site the following will be used during the excavation and handling of contaminated soils: • Overalls (washable / disposable as required) • Cut proof and nitrile gloves • Disposable P2 dust masks • PPE requirements may be updated if a contaminant discovery incident occurs.
Disposal of used PPE	All disposable PPE should be placed in an appropriate rubbish sack, closed, and disposed of to a suitable waste disposal facility.

11 ONSITE REUSE / SOIL DISPOSAL

The PM, following advice of the environmental specialist, is responsible for decisions about soil reuse, soil importation and offsite disposal.

Table 17 Soil reuse and disposal

Category	Criteria
Reusable	Material must meet the human health criteria from the intended reuse location.
Imported	In order for material to be imported onto Site it must meet the following criteria: Material must meet the definition of cleanfill Material must be compliant with WasteMinz clean fill guidelines (WasteMINZ, 2023) If material is not sourced from a cleanfill site it should be tested and analysed to ensure the Site can receive it. The rate of testing should be one sample per 500m^3 with no less than three samples from any one source.
Disposable	Prior to earthworks commencing, the contractor will arrange for the disposal of soil and excavated material at an appropriate facility that is licenced to accept soil of this nature.

12 UNEXPECTED CONTAMINATION DISCOVERY

The unexpected discovery of contaminated material is possible during the completion of earthworks associated with the Project.

- The Site Supervisor will be responsible for the implementation of the unexpected contamination discovery protocols
- The environmental specialist will be responsible for recommending site controls, PPE, and sampling
- The project manager is responsible for notification of the regulatory authorities.

12.1 Indicators of Contamination

If indicators of contamination are observed at the Site, the protocols in this section should be implemented. These include:

- Soil discolouration or staining
- Unusual odours
- Fibrous materials
- Asbestos containing materials
- Demolition or construction waste
- Hydrocarbon staining or impacts
- Rubbish / refuse

12.2 Immediate action upon discovery

If any of the contaminant indicators are observed:

- Works within 10 metres of the discovery will temporarily stop
- The site will be made safe (if possible)
- Notifications will be made to Emergency Services if required.
- Notification to the Environmental Specialist, who will for providing advice on safe handling, controls, PPE, and sampling requirements (if any).
- The PM will be responsible for the implementation of the unexpected contamination discovery protocols and notification of regulatory authorities as soon as possible (and not more than 24 hours following the incident).

13 DEWATERING CONTROLS

The PM is responsible for managing the dewatering requirements of the plan.

Dewatering will be undertaken in accordance with a dewatering management plan and consent requirements for the Site.

13.1 Prior to dewatering

Prior to dewatering the following will be reviewed by the environmental specialist:

- Consent requirements
- Location of dewatering
- Risk classification of area
- Proximity to higher risk areas
- Dewatering methodology and volumes
- Proposed discharge point
- Previous sampling

This will then be used to assess sampling requirements for groundwater or treatment options for the discharged groundwater.

Groundwater samples should be submitted to an IANZ-accredited laboratory and analysed for the contaminants identified by the Environmental Specialist. Results should be compared with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (Water Quality Australia, 2018), together with any applicable consent limits or receiving-environment criteria, to assess the potential effects of discharge.

The construction team will record the details and methodology of the dewatering and treatment approach agreed with the Environmental Specialist.

13.2 During Dewatering

During dewatering, the activity will be:

- Actively managed and not left unattended.
- Managed in accordance with the agreed dewatering and treatment methodology (if required).

Records of the activity (including time started, time finished, approximate volumes involved, and discharge or disposal location for water) will be kept.

13.3 Post Dewatering

Records will be supplied as part of the project reporting outlined in 7.1.1.

14 ASBESTOS CONTROLS

The PM is responsible for implementing the asbestos controls at the Site.

14.1 Presence of asbestos onsite

Asbestos has been identified as a potential issue in the farm dump and fill sites and building fabric at the WTR Site. If asbestos is found in these areas of the Site, or as part of a contamination discovery incident, the asbestos related controls in this Section will be implemented.

14.2 Licenced asbestos specialist

If asbestos is confirmed onsite, depending on the licencing requirements a licensed asbestos specialist may be required to prepare management plans, undertake the removal of the asbestos, supervise the works and produce clearance certification for the worksite.

14.3 Legislative requirements

If asbestos is identified at the Site works will need to be undertaken in accordance with the following legislation and guidance documents:

- Health and safety at work act (2015)
- Health and Safety at Work (Asbestos) regulations 2016
- New Zealand Guidelines for Assessing and Managing Asbestos in Soil (2024) (NZGAMAS)

14.4 Sampling

Where suspected asbestos is encountered the material will be tested to confirm the presence and type of asbestos. The Environmental Specialist will coordinate this process.

14.5 Asbestos licencing triggers

The licensing category, asbestos concentration criteria, PPE, respiratory protection, fibre-suppression measures and decontamination requirements must be confirmed by the licensed asbestos specialist before work begins. The confirmed requirements must distinguish Class A licensed work, Class B licensed work, asbestos-related work and unlicensed asbestos work, and must state whether each numerical criterion applies independently or in combination. These are outlined in Table 18.

Table 18 Asbestos requirements

Licensing requirements	PPE requirements	Respiratory protective equipment	Dust / fibre suppression	Decontamination facilities
FA = Friable Asbestos, AF = Asbestos-containing Fibres / Asbestos Fibres (friable condition)				
Class A **>1% w/w FA/AF in soils**	Disposable type 5 overalls, nitrile gloves, steel toe gumboots or footwear with disposable overshoes	Full face P3 respirator with particulate filter.	Water and asbestos encapsulating polymer emulsion applied before start of work and during as required. A surfactant should be considered for amphibole fibres.	Basic disposable wet contamination tent or trailer.
Class B **>0.001% w/w FA / AF** **>1% w/w ACM**		Half face P3 respirator with particulate filter. Potential for full face mask if friable asbestos is identified.		Basic disposable decontamination tent and footwash.
Asbestos related work **>0.001% w/w FA /AF** **>0.01% w/w ACM**		Disposable P2 mask	Water via localised points. Surfactants and polymers may be required when the location is regarded as sensitive. Temporary cover of contaminated area awaiting remediation.	
Unlicensed asbestos work **≤0.001% w/w FA /AF** **≤0.01% w/w ACM**	No asbestos specific PPE required.	None required if environmental specialist confirms it is unlikely that asbestos will exceed trace levels in air monitoring (0.001 f/mL) or air monitoring confirms asbestos below 0.01 f/mL		Footwash and used PPE collection area.

14.6 Additional Controls

Depending on the results of the sampling additional controls may be required. These are detailed in Table 19.

Table 19 Additional asbestos controls

Requirement	Details
Management plans	Depending on the concentrations of asbestos at the Site an asbestos management plan may be required. This should be prepared by an appropriately experienced person.
Works notification	Under the requirements of the Health and Safety at Work Regulations (Asbestos) 2016, WorkSafe New Zealand needs to be notified before the disturbance of asbestos contaminated soils for Class A and B works. The works should be supervised by an appropriately licensed person and undertaken by an appropriately licensed removalist.
Site works	• The worksite should be zoned and appropriately fenced. • Signs should be placed at entry/exit points, and boundary air monitoring should be undertaken. • When conducting earthworks where asbestos is present, the Site should be separated into zones: ○ A “controlled” area, where disturbance of asbestos contaminated soil is undertaken ○ “intermediate” area, where PPE is removed, equipment is wiped down and cleaned, and hands and face washing is undertaken ○ A “general” area, where other work is undertaken.
Waste removal	Asbestos contaminated material should be disposed of at a consented acceptance location.
Completion of works	Following works a clearance assessment must be made by the appropriate person in accordance with the NZGAMAS. • Class A: Independent assessor • Class B: Competent person Following the inspection a clearance certificate should be provided an attached to the Project Report.

15 AIR QUALITY MONITORING

15.1 Asbestos

If asbestos has been identified at the Site, an environmental specialist should be contacted to determine the controls (if any) required to complete the work. Further requirements for asbestos controls are included in Section 14.

15.2 Landfill gas

Landfill gas may be an issue when working around the farm dump or offal pits at the Site. Monitoring should be undertaken with an appropriately calibrated multi-gas meter.

If vapour is encountered, work should be ceased immediately. A SQEP should be consulted to consider the risk and whether it is safe to continue or whether elevated levels of protection and more stringent procedures are required. A monitoring programme should be implemented.

Exposure limits for working around the farm dump and offal pits are outlined in Table 20

Table 20 Vapour monitoring exposure limits

Gas / vapour	Action level	Instrument
Methane	1% (20% of the LEL)	Multi-gas meter
O_2	19.5 –23.5%	Multi-gas meter
CO_2	Below 5,000 PPM	Multi-gas meter
CO	Below 25 PPM	Multi-gas meter
H_2S	Below 1 PPM	Multi-gas meter

16 WORKS COMPLETION REPORTING

Following completion of the earthworks, a Works Completion Report (WCR) shall be prepared by a SQEP in accordance with CLMG No 1 to confirm that the works have been completed in accordance with this CSMP. The WCR shall include:

- Records of observation of works by the Environmental Consultant, including photographic records.
- Soil movement forms and/or landfill dockets showing proof of contaminated soil disposal.
- Declaration by the Environmental Consultant that the works have been completed in accordance with this Plan.
- Site plan showing the final extent and dimensions of the excavated areas.
- Details of site validation inspections and testing.

This report should be supplied to the council within two months of the completion of soil disturbance.

17 DOCUMENT CONTROL

The CSMP will be reviewed and amended as necessary during works at the Site to ensure the potential risks to human and environmental health are appropriately managed. Amendments to the CSMP should be undertaken by the SQEP and submitted for regulatory approval before the implementation of updates.

18 PRACTITIONER STATEMENT

I, David Jackson of BCD Group certify that:

This management plan meets the requirements of the Resource Management (National Environmental Standard for assessing and managing contaminants in soil to protect human health) Regulations 2011 because it has been:

- Undertaken by a suitably qualified and experienced practitioner, and
- Reported on in general accordance with the current edition of Contaminated Land Management Guidelines No 1 – Reporting on contaminated sites in New Zealand,
- Reported on in general accordance with the current edition of Contaminated Land Management Guidelines No 5 – Site investigation and analysis of soils, and
- The report is certified by a suitably qualified and experienced practitioner.

19 REFERENCES

BCD Group. (2026). *Preliminary Site Investigation - Waikato Thoroughbred Racing Greenfield Hub.* BCD Group.

BRANZ. (2024). *New Zealand Guidelines for Assessing and Managing Asbestos in Soils.* Porirua: BRANZ.

Ministry for the Environment. (2011). *Contaminated land management guidelines No 2 Hierarchy and application in New Zealand of Environmental Guideline Values (Revised 2011).* Wellington: Ministry for the Environment.

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Ministry for the Environment. (2023). *Hazardous Activities and Industries List guidance Identifying HAIL land.* Wellington: Ministry for the Environment.

Waste Management Intitute of New Zealand. (2024). *Waste Industry Guidelines Disposal of Low-Level Asbestos Contaminated Soil at a Landfill.*

WasteMINZ. (2023). *Technical Guidelines for the Disposal to Land, Revision 3.1.*

Water Quality Australia. (2018). *Guidelines for Fresh and Marine Water Quality.*

20 REPORT LIMITATIONS

This document is prepared by BCD Group Limited (BCD) for Waikato Thoroughbred Racing (the Client) for the limited purposes described in this document. BCD accepts no liability if the document is used for a different purpose or if it is used or relied on by another person. Any such use or reliance will be solely at their own risk.

This report has been prepared by BCD based on information provided by the Client and other third parties. BCD has not independently verified the information and has relied upon it being accurate, complete, and sufficient for use by BCD in preparing the report. BCD accepts no responsibility for errors or omissions in, or the currency or sufficiency of the provided information.

This document has been prepared based on observations of the site vicinity, review of third-party information, desktop review of historical aerial photographs and analysis of selected soil samples. The soil samples were analysed by an analytical laboratory for selected contaminants during the Site Investigation. The site conditions as described in this document have been interpreted from and are subject to this information and its limitations, and accordingly, BCD does not represent that its interpretation accurately represents the full site conditions.

Laboratory test results provide an approximation of the concentration of the tested analytes and are subject to the inherent limitations of the laboratory techniques used for the tests. Interpretations of subsurface conditions, including contaminant concentrations, are not guaranteed at distances away from the specific points of sampling.

Appendix A Site location



Client: WAIKATO THOROUGHBRED RACING — TE RAPA · CAMBRIDGE · WAIPA

Contractor:

BCD GROUP

Sheet: Site Location

Project Title: Waikato Thoroughbred Racing
Pencarrow, Hooker & Duncan Roads

Revision	Date	By	Reason
01	12/12/2025	SL	Master Planning

Drawn: SL
Engineer: SL
SCALE: N/A
At: A3
Job Number: 23-1883
Sheet Number:
Revision: 01

All dimensions to be verified on site before making any shop drawings or commencing any work

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LEGEND

- Site Boundaries
- Internal roads
- Existing Structures

Tamahere Drive
Strawberry Fields Lane
Summerfield Lane
Pencarrow Road
Waikato Expressway State Highway 1
Duncan Road
Hautapu Road
Hooker Road
State Highway 1
Discombe Road

0 300 600 900 m

Notes:
Elevation Contours are in terms of NZVD2016, generated using QGIS based on 2021 Lidar sourced from LINZ.
Aerial imagery, property boundaries, etc sourced from LINZ.

Client: WAIKATO THOROUGHBRED RACING — TE RAPA · CAMBRIDGE · WAIPA

Contractor:

BCD GROUP

Sheet: Internal Infrastructure

Project Title: Waikato Thoroughbred Racing
Pencarrow, Hooker & Duncan Roads

Revision	Date	By	Reason
02	27/02/2026	BB	Fast Track Referral Application
01	12/12/2025	SL	Master Planning

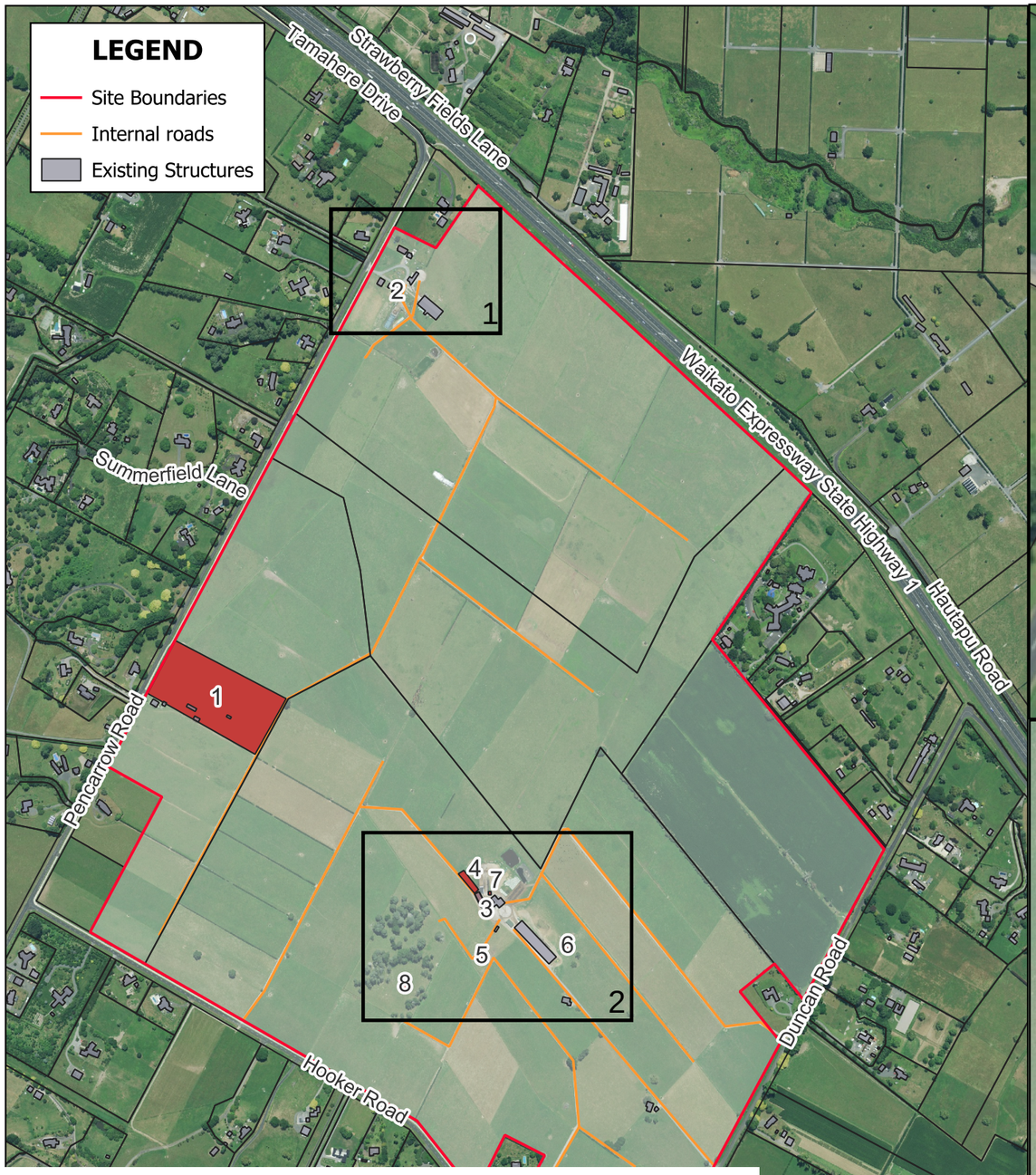
Drawn: SL
Engineer: SL
SCALE: 1000
At: A3
Job Number: 23-1883
Sheet Number:
Revision: 02

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Appendix B Site masterplan (refer Appendix M: Architectural Master Plan and Drawings – Fast-track Substantive Application Planning Assessment – Overall Summary)

Appendix C HAIL locations





HAIL ID	Activity description
01	Farm dump located in Paddock 36 of the Duncan property
02	Storage shed and fuel tanks
03	Vehicle shed
04	Offal pit
05	Offal pit
06	Offal pit
07	Fuel storage tanks
08	Burn pile

Client: WAIKATO THOROUGHBRED RACING — TE RAPA · CAMBRIDGE · WAIPA

Contractor:

BCD GROUP

Sheet: HAIL Locations

Project Title: Waikato Thoroughbred Racing
Pencarrow, Hooker & Duncan Roads

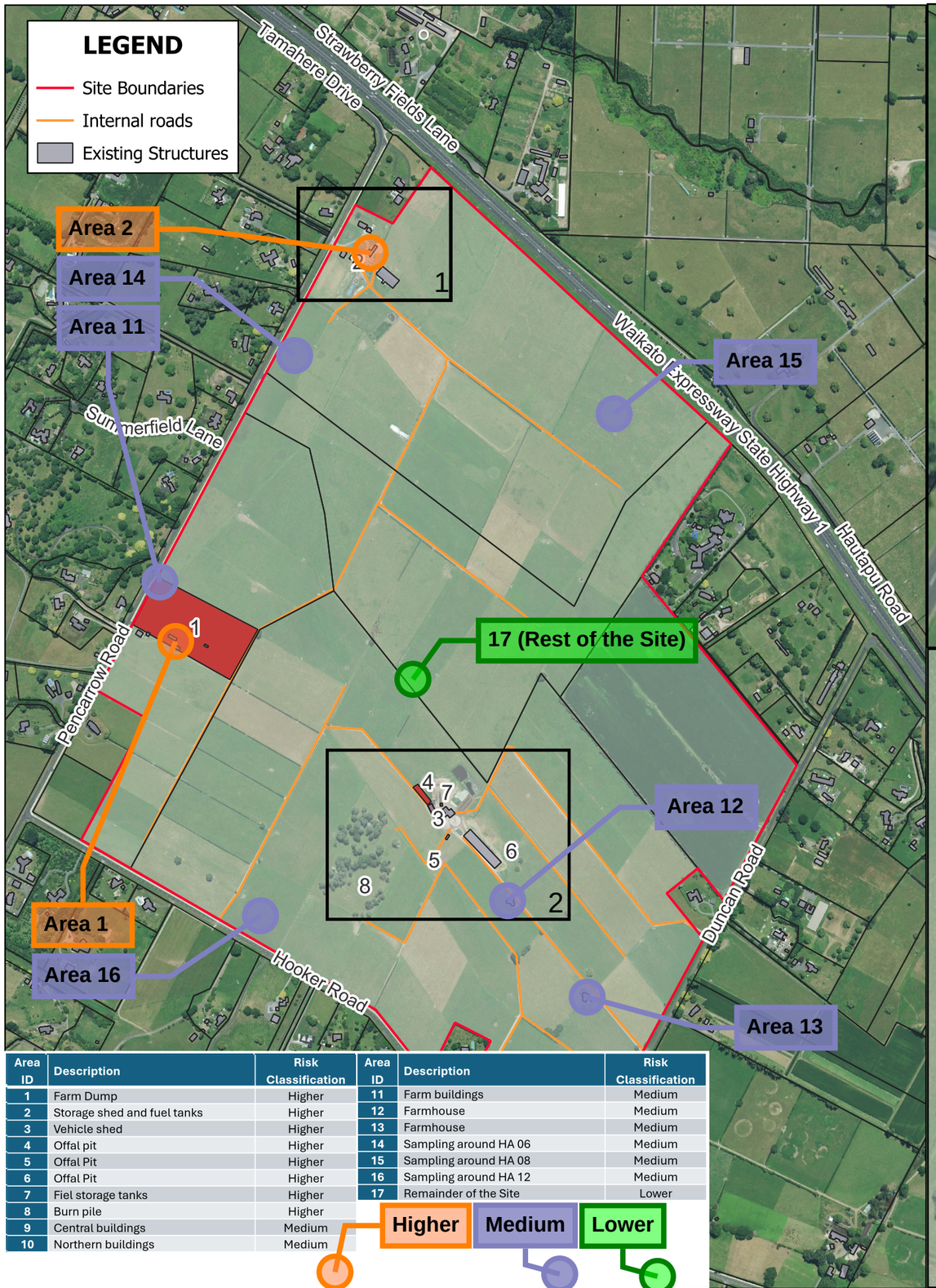
Revision	Date	By	Reason
01	27/02/2026	BB	Fast Track Referral Application

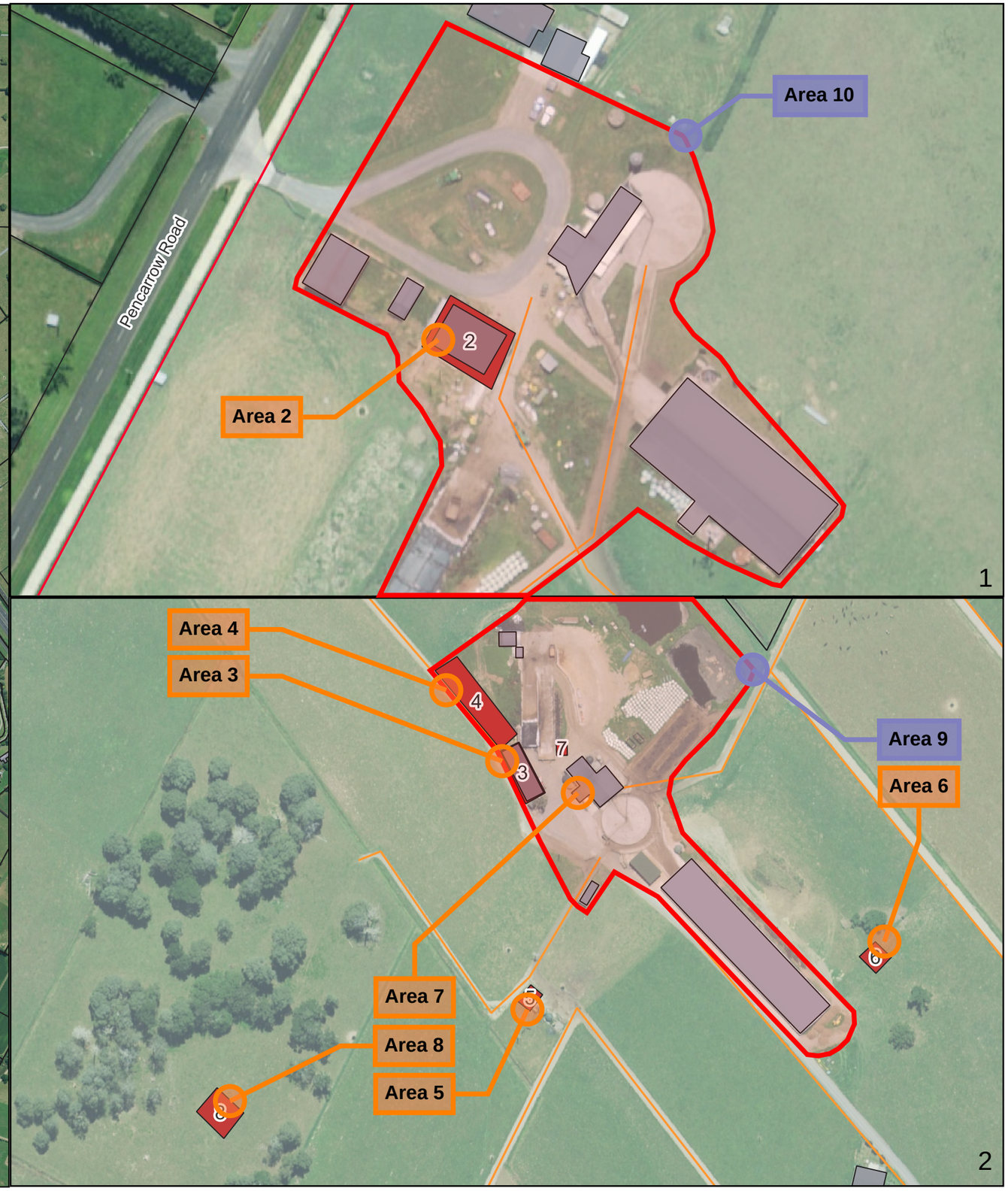
Drawn: SL
Engineer: SL
SCALE: 1000
At: A3
Job Number: 23-1883
Sheet Number:
Revision: 01

All dimensions to be verified on site before making any shop drawings or commencing any work

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Appendix D Risk classification





Area ID	Description	Risk Classification
1	Farm Dump	Higher
2	Storage shed and fuel tanks	Higher
3	Vehicle shed	Higher
4	Offal pit	Higher
5	Offal Pit	Higher
6	Offal Pit	Higher
7	Fiel storage tanks	Higher
8	Burn pile	Higher
9	Central buildings	Medium
10	Northern buildings	Medium

Area ID	Description	Risk Classification
11	Farm buildings	Medium
12	Farmhouse	Medium
13	Farmhouse	Medium
14	Sampling around HA 06	Medium
15	Sampling around HA 08	Medium
16	Sampling around HA 12	Medium
17	Remainder of the Site	Lower

Higher | Medium | Lower

Client: WAIKATO THOROUGHBRED RACING – TE RAPA · CAMBRIDGE · WAIPA

Contractor

BCD GROUP

Sheet: Contamination Risk Areas

Project Title: Waikato Thoroughbred Racing
Pencarrow, Hooker & Duncan Roads

Revision	Date	By	Reason
02	26/08/2026	SNC	Substantive Application - Fast Track

Drawn: SNC
Engineer: SNC
SCALE: 1000
At: A3
Job Number: 23-1883
Sheet Number:
Revision: 02

All dimensions to be verified on site before making any shop drawings or commencing any work

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Appendix E Project reporting template

Project Report

This Project Report must be completed for earthworks at the WTR Site. Contractors are required to complete Section 1 -3. A Suitably Qualified and Experienced Person (SQEP) is required to complete Section 4. On completion this form should be provided to the Project Manager.

Section 1 – Project information (Sections 9, 10)			
Contractor		Date of works	
SQEP		Company	
Project name			
Summary of works			
Location of works			
Risk area	Higher ☐	Medium ☐	Lower ☐
Details of soil sampling completed			
Details of contractor contaminated land briefing			

Section 2 – Soil disturbance (Sections 8, 10)			
Soil disturbance volume			
On-site reuse volume		Location of reuse	
Offsite removal volume		Disposal locations	
Imported material volume		Source of imported material	
Records of testing sent to receiving facility and acceptance record		Attached ☐	
Disposal receipts (if applicable)		Attached ☐	

Additional management required? (Sections 11, 12, 13, 14, 15)			
Was additional management required?		Yes ☐	No ☐
Desludging? ☐	Dewatering? ☐	Asbestos? ☐	Air quality? ☐
Details of additional soil management required			
Contaminated soil inspections?			
Were contaminant discovery protocols implemented? If so, detail.			
Form completed by		Date	
Project Manager		Signed	
Environmental Specialist (if required)		Signed	