

To: Rory Smeaton

From: Kevin Tearney

Company: Porirua City Council

SLR Consulting New Zealand

cc:

Date: 12 June 2026

Project No. 820.030804.00001

**RE: Mt Welcome Project
Contaminated Land Assessment**

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1.0 Background

Porirua City Council (PCC) is a party to the fast-track substantive application for the Mt Welcome residential development the (Project), located at 422, 422A and 422B State Highway 59, 34 Muri Road and within State Highway (SH) 59 road reserve Pukerua Bay.

PCC has engaged SLR to review and comment on Preliminary Site Investigation (PSI) reports and a Contaminated Site Management Plan (CSMP) prepared by Pattle Delamore Partners (PDP), and proposed conditions of consent relating to contaminated land, provided in the Substantive Application dated 16 March 2026.

The PDP reports comprise the following:

- Memorandum, Executive Summary for Preliminary Site Investigation – Mount Welcome Pukerua Bay, 17 December 2025 ref W027550003M001_Final.
- Preliminary Site Investigation – Mount Welcome Station, ref W027550003L001_Final, 17 November 2025, which covers properties at Part Lot 1 DP 89102 and Lot 2 DP 89102 located at 442a and 422b SH59 Pukerua Bay and includes a summary of PSI findings for Lot 3 DP 89102¹ and Lot 2 DP 534864.
- Preliminary Site Investigation, Lot 2 DP 534864, Mt Welcome Station, 14 March 2022, ref W027550003L001_Final A03437103L001_PSI_Lot 2 Mt Welcome Station final_Updated.doc, which covers Lot 2 DP 534864.
- Preliminary Site Investigation, Mt Welcome Station, 27 August 2019, ref A03437100L001_PSI_Mt Welcome Station Porirua, which covers 422 SH1 stated as Lot 3 DP 89102¹.
- Contaminated Site Management Plan – Mt Welcome Development 14 November 2025, ref W027550004R001_Final. The CSMP applies to the 'western portion of the Mount Welcome development area, legally described as Part Lot 1 DP 89102, Lot 2, DP 89102 and Lot 3 DP 89102¹.

An initial review of the August 2019 and March 2022 PSIs was previously undertaken by SLR and reported to PCC in August 2025.

Consent conditions were provided in Appendix 7 of the Substantive Application.

The properties covered by the PSIs are shown in **Figure 1** and comprise:

¹Lot 3 DP 89102 is not shown on the referenced figures or on the Property Maps on the PCC map portal. It is also referenced as #422 in the PSI. There appears to be an error, with the correct identifier being Lot 1 DP 534864, 422 SH59 Pukerua Bay.

- PSI 2025 - Part Lot 1 DP 89102 422A and Lot 2 DP 89102 422B SH59 Pukerua Bay.
- PSI 2022 - Lot 2 DP 534864 located at 422A SH59 Pukerua Bay.
- PSI 2019 - Lot 1 DP 534864¹ located at 422 SH59 Pukerua Bay.

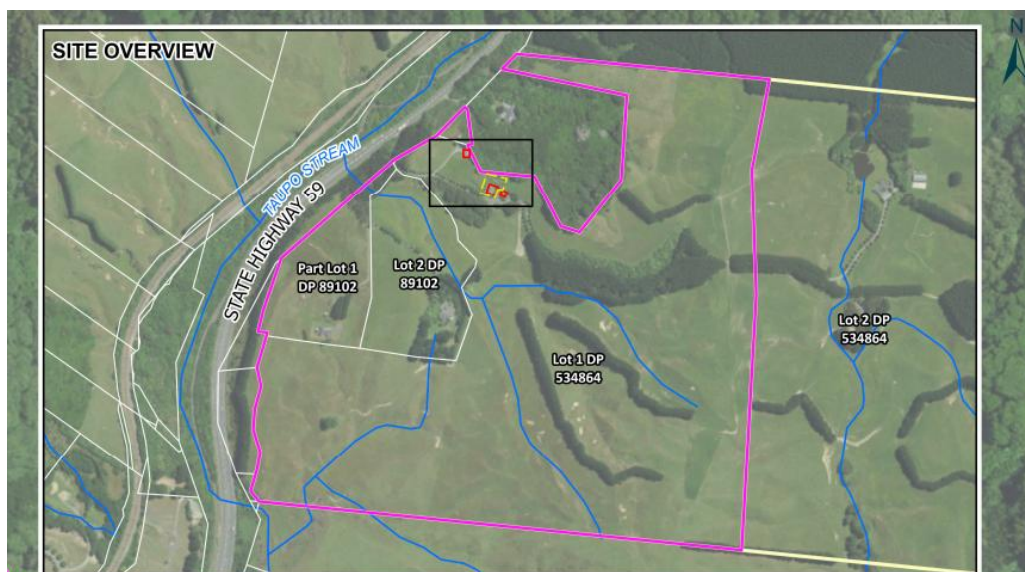


Figure 1 Site Overview (from Figure 2, CSMP (PDP November 2025))

2.0 Proposal

The proposed development is described as 949 residential lots, a neighbourhood centre and associated roads and infrastructure. This shown by **Figure 2**. The development will include the removal of existing residential dwellings within Part Lot 1 DP 89102 (#442A), Lot 2 DP 89102 (#422B) and Lot 1 DP 536864 (#422). The residential dwellings and associated buildings within Lot 2 DP 534864 (also #422A) will remain. It is stated that Lot 2 DP 534864 will become Lot 5003.

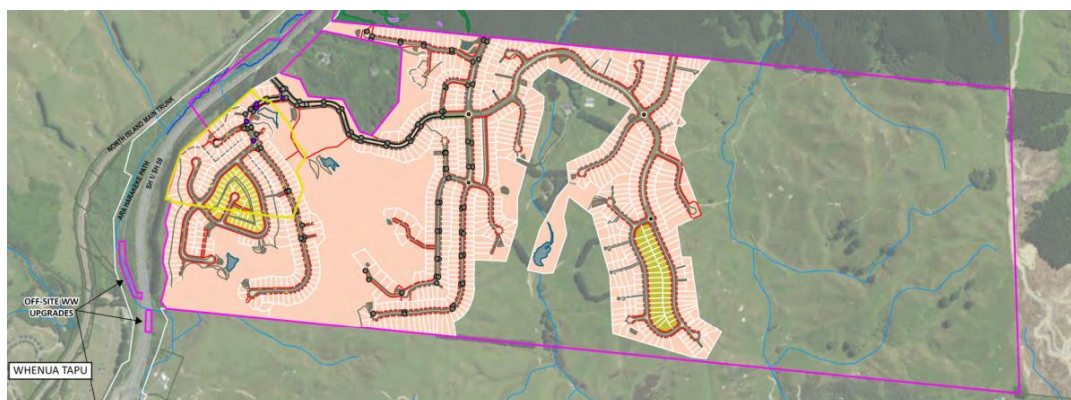


Figure 2 Proposed Development (from Figure 2, PSI (PDP 2025))



3.0 Review

3.1 Land Contamination

The PSI preparation included the review of publicly available information in relation to the environmental setting, land use and potential ground contamination, including review of Certificates of Title and aerial photographs, site walkover inspections and interviews with people knowledgeable about each site. The PSIs were also informed by proposed development plans, with the proposed development layout set out in 2025 PSI, used as the basis for the final assessment of effects.

3.1.1 Lot 1 DP 534864

The PSI documents that Lot 1 DP 534864 was in pastoral land use since at least 1941, with the addition of associated residential dwellings and sheds.

Buildings and structures on 1 DP 534864 include the present-day residential dwelling and main woolshed, located in the western area of the site in proximity to SH1. Driveway access to the structures is via State Highway 1. A small, assumed residential, building was also present near to the southwestern corner of the property.

Further buildings and structures are evident in the vicinity of the woolshed by 1979. These structures are interpreted by PDP to include stock yards and races and a potential sheep dip/spray race to the east of the main woolshed; a smaller building, also labelled as woolshed, was also identified by PDP. These features are shown on 1979 aerial photograph (**Figure 3**) below.

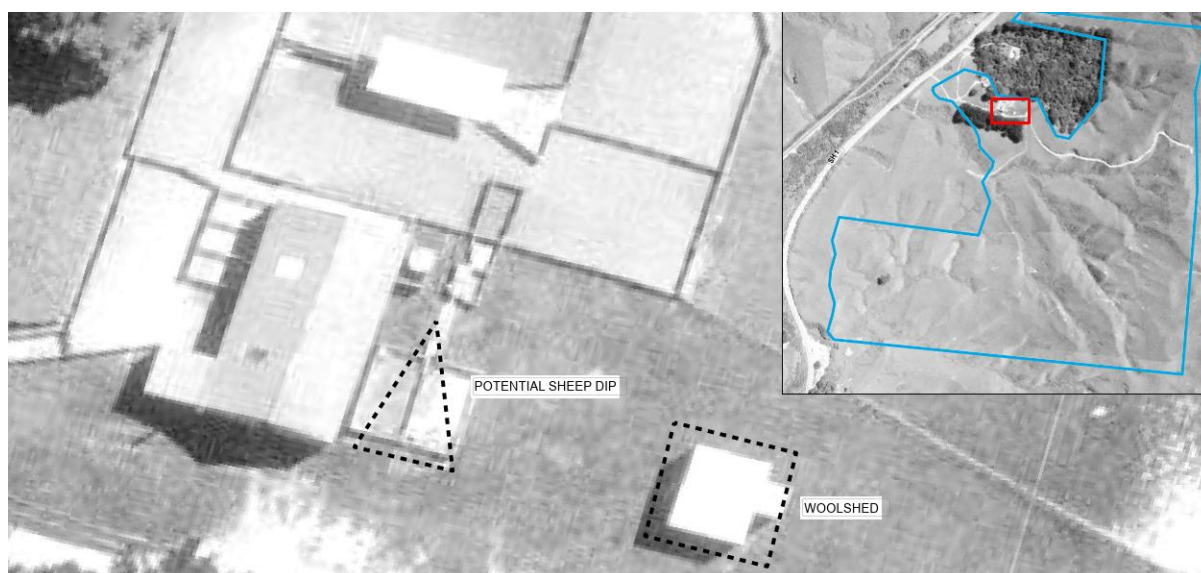


Figure 3 Location of stock yards, buildings and potential sheep dip/spray race (from PSI. Appendix B (PDP 2019))

The small woolshed appears to have been removed by 2018.

PDP has identified the residential dwelling and the current and former woolsheds as potentially hazardous activities and industries List (HAIL), comprising:

- HAIL I, associated pre-2000 buildings potentially containing asbestos containing materials (ACM) and lead from lead based paints.

The inferred sheep dip/spray race is assessed as:



- HAIL A8, comprising a potential sheep dip or dips

These inferred HAIL sites are shown in **Figure 4** and lie with the proposed development area. **Figure 4** also shows the locations for proposed soil sampling set out in the CSMP.



Figure 4 HAIL land in Lot 1 DP 534864 showing proposed soil sampling locations (from CSMP, Figure 2 (PDP 2025))

3.1.2 Lot 2 DP 534864

The PSI documents that Lot 2 DP 534864 was in pastoral land use since at least 1942. An 'unidentified structure' was noted on aerial photographs from 1942, 1966 and 1973, not visible in 1988. PDP interpret this to be a possible spray race or potential building platform. I interpret the presence of two features in 1942, comprising fenced stock pens and a linear feature of uncertain origin, which is not visible in subsequent aerial photographs. The feature identified by PDP is shown in Figure 5 below².

PDP also identify three buildings (two apparent residential dwellings and a smaller building), first noted in 2002 located along the access track which cuts through the central portion of the site. The remaining site area was in pastoral land use. An additional building adjacent to the dwelling located within the northwestern portion of the site was noted in 2011.

The locations of these building are shown on **Figure 5**. Based on the site walkover, these comprise:

- Residential dwelling.

² My interpretation is that this feature is located to the east of the Helicopter hanger also shown in Figure 5, some 60 m south of the location shown on Figure 5.



- Helicopter hangar/shed and helipad. A mobile jet fuel storage (Jet A-1 fuel) was located on the concrete pad outside the hangar. One barrel of jet fuel was also noted on a trailer. A partially constructed/deconstructed helicopter was seen outside the hangar.
- Storage shed to the south of the main residential dwelling used to store farming machinery and agricultural chemicals, also including stock pens.
- A second storage shed (implement shed) in the central part of the property, east of the farm machinery shed³. An above ground storage tank (AST) was located outside on grass adjacent to the storage shed. No signs of spills or leaks were noted. No details were obtained on AST contents or storage history.

There was no spraying equipment observed on site and no asbestos building materials noted in any structure present on site.

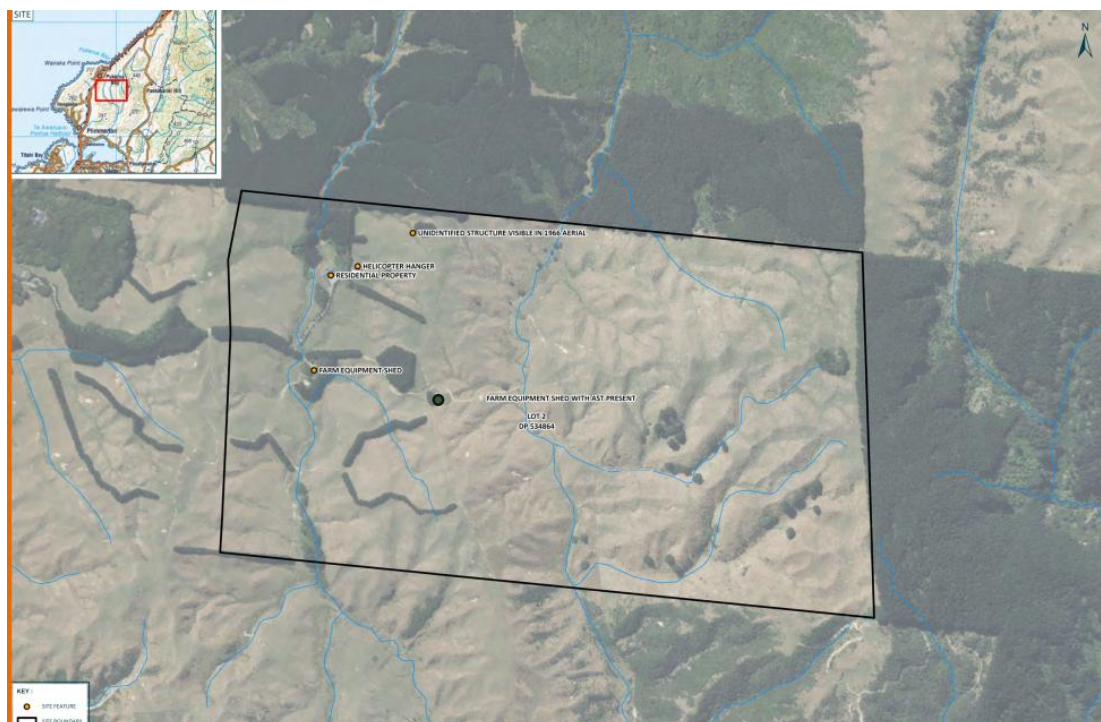


Figure 5 Building and structures within Lot 2 DP 534864 (from PDP (2022))

PDP identified the following potential HAIL:

- HAIL A 13, comprising above ground bulk fuel storage adjacent to the implement shed and storage of Jet A1 fuel in a mobile tanker and a drum likely associated with helicopter pad and shed. Small quantities of other chemicals were also noted in these areas.

The potential sheep dip or spay race (HAIL A8), identified from the early historic aerial photographs was later assessed as not a sheep dip. Notwithstanding, it was advised that excavations in this area should proceed with caution.

PDP initially advised that further investigations would be required to determine if any risk to human health (or environmental receptors) exists from the identified HAIL (or potential HAIL) activities, and what (if any) particular site management measures must be put in place

³ The approximate location of the implement shed is shown by the green dot in Figure 5, inserted by SLR.



during the proposed site development activities, based on the development proposal at the time to the PSI. The currently planned development excludes the potential HAIL land identified by PDP. PDP conclude that no further investigations are required.

3.1.3 Part Lot 1 DP 89102 and Lot 2 DP 89102

The PSI documents that Part Lot 1 DP 89102 and Lot 2 DP 89102 were in pastoral land use since at least 1942. Access tracks are visible from 2005, with a residential dwelling also located within Lot 2 DP 89102. A residential dwelling was also located within Part Lot 1 DP 89102 by 2009.

No HAIL was identified from the record review and the site walkover.

These properties lie within the planned development. PDP conclude that no further investigations are required.

3.2 CSMP

The aim of CSMP is stated to be to provide guidance and controls for:

- Excavation of potentially contaminated soil within the identified HAIL areas.
- Accidental discovery of contaminants within the relevant areas of the site during demolition of the residential properties and associated structures.

It is noted that the accidental discovery protocol should also be applied to the wider development area⁴. It also aims to minimise the exposure risk to the environment and excavation workers.

The CSMP presents information relating to:

- Roles and responsibilities of the parties involved.
- Consenting requirements.
- Excavation site controls.
- Procedures for excavating contaminated soils.
- On-site stockpile management.
- Sediment and erosion control.
- Soil removal and transport including for contaminated soil encountered.
- Health and safety controls.

The CSMP also provides a summary of the Detailed Site Investigation (DSI) to be undertaken in Lot 1 DP 534864 to investigate the identified HAIL land, including a preliminary sampling plan (**Figure 4** in this report).

The sampling and analysis are designed to identify contamination associated with the inferred sheep dip/spray race (11 sampling locations to 2 m depth) and to assess the presence of residual ACM and lead (six locations to 0.5 m depth) in the halo of the two farm buildings present on site and the footprint of the other shed now removed (and termed woolshed in the PDP PSI reports). Approximately 28 samples are to be analysed for heavy

⁴ The CSMP lists the site as including Lot 3 DP 89102. This Lot is not shown on site plans in the CSMP and may be Lot 1 DP 534864.



metals, 10 samples for asbestos (semi quantitative) and 11 for organochlorine pesticides (OCPs).

Remediation, site validation and updates of the CSMP are identified as possible further actions, depending on the outcome of the DSI.

3.3 Proposed Conditions of Consent

3.3.1 District Conditions

Condition 8 of the District Conditions references condition 35 requiring a CSMP for certification by Council.

35. At least 20 working days prior to the commencement of construction works on stages where potential HAIL sites are located in the Preliminary Site Investigation (PSI) in Condition 1, the Consent Holder shall provide a Detailed Site Investigation (DSI) Report, as well as submit a final Contaminated Site Management Plan (CSMP) to the Manager, Resource Consents and Monitoring for certification in accordance with Condition 8. The DSI shall detail the findings of onsite investigation works (including soil sampling) undertaken following the demolition of any existing buildings. The CSMP will outline procedures that must be followed for the disturbance, handling and disposal of soil. The DSI and CSMP shall address the matters outlined in the Ministry for the Environment's Contaminated Land Management Guidelines.

This certified CSMP must be available at pre-start meeting (Condition 38).

Condition 65 covers the requirement for a site validation report on completion of remedial works prepared by a suitably qualified contaminated land professional in accordance with the Ministry for the Environment Contaminated Land Management Guidelines.

There is no condition covering the review and / or certification by Council of the DSI scope, which is stated in the PSI as preliminary.

3.3.2 Regional Conditions

Condition 49 of the Regional Conditions under *Discharge from Soil Contamination* is identical to Condition 35 of the District conditions of consent.

There appear to be no other contaminated land related Regional Conditions.

4.0 Assessment

I consider that the PSI reports have been prepared by Suitably Qualified and Experienced Practitioners (SQEP) and are suitable for use as supporting specialist technical reports for the Application.

I agree that the PSIs have identified the HAIL land within Lot 1 DP 534864 that will be affected by the planned development. This includes a potential sheep dip/spray race to the south of the main woolshed. I also agree that age of the buildings indicate the potential for lead and asbestos in building fabric and associated shallow soil contamination. I note that the PSI recommends pre demolition asbestos surveys of these buildings, which should be undertaken. The pre demolition asbestos survey recommendation does not appear to have been carried through to the CSMP or the Consent Conditions.

I recommend that the requirement for asbestos surveys of buildings in Lot 1 DP 534864 be included in the CSMP.



Although not material to the outcome, it appears that the PSIs and CSMP sometimes call Lot 1 DP 534864, Lot 3 DP 534864. This appears to be an error, and if so, it should be rectified. I note that Lot 3 DP 534864 does not appear on site plans.

HAIL land within Lot 2 DP 534864 as I understand it, will not be disturbed by the planned development. This includes the potential former sheep yards and the other undetermined linear feature that I infer were located to the east of the Helicopter Hangar, and not at the location shown on the summary figure in PDP (2022), labelled 'unidentified structure' and reproduced in this report as **Figure 5**. I note that this unidentified structure lies within the planned development.

As reported in the PSI, PDP initially interpreted the feature as a potential sheep dip/spray race but finally conclude that it was not used for this purpose and label it as unidentified. This reclassification appears to be based on the site walkover undertaken for the PSI. I agree that the site walkover photographs do not indicate the presence of sheep dip/race infrastructure and I also think that the terrain does not appear to be suitable for that use.

I agree that the HAIL land is unlikely to present within Part Lot 1 DP 89102 and Lot 2 DP 89102.

I consider that the CSMP has been prepared by a SQEP and covers the main elements required for a CSMP. It is focussed on the HAIL land but includes an unexpected discovery protocol for all properties subject to the planned development. This is appropriate.

I also note that District Condition 35 and Regional Condition 49 require an updated CSMP be submitted for certification following the DSI, prior to any remediation works. This is appropriate.

In relation to the proposed DSI, I agree that the general scope is appropriate. However, the scope is generic and it is not clear, for example, how the investigation will be amended if groundwater is encountered and why groundwater is not being specifically targeted given that it is stated that groundwater is possibly shallow in this area of the site and contamination from sheep dips has the potential to contaminate groundwater.

I recommend that the Applicant provides a Sampling and Analysis Quality Plan (SAQP) covering the proposed DSI for review and certification prior to the DSI works. This could be offered as a consent condition.

5.0 Closure

We trust that this report meets your requirements. Please do not hesitate to contact me if you would like to discuss.

Regards,

SLR Consulting New Zealand



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