

MEMO

To: Chris Watt; Development Project Facilitator - Western Bay of Plenty District Council

From: James Danby, Planning Consultant - iPLAN Ltd

cc: -

Date: 9 December 2025

Re: TNL Stage 2– Contaminated Land Management – Fast Track Act Application

Purpose

The purpose of this memo is to provide feedback on draft conditions relating to the proposed management and use of potentially contaminated land under application submitted for the Takitimu Northern Link Stage 2 (**the project**) under the Fast Track Approvals Act 2024.

Background

The project is required to assess the management and use of potentially contaminated land in response to the requirements of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (**NESCS**) and the Bay of Plenty Regional Council (**BOPRC**) Regional Natural Resources Plan (**RNRP**).

The project includes a Preliminary Site Investigation¹ (**PSI**) of the land that will be affected by the proposed works. The PSI identifies several pieces of land covered by the NESCS. Given the nature of the project the PSI recommends that these pieces of land are subject to site specific Detailed Site Investigations (**DSI**) on a site-by-site basis as staged construction works are implemented within the designation corridor. Table 4 of the PSI identifies the pieces of land that will require a DSI. Under Regulation 11 of the NESCS this approach is described as a discretionary activity.

Waka Kotahi / NZTA (**the applicant**) have circulated draft conditions on this basis.

In terms of Western Bay of Plenty District Council's (WBOPDC) regulatory jurisdiction the following comments primarily relate to the NESCS, whilst noting that there is also cross over with the contaminated land provisions of the RNRP.

Contaminated Land – General Approach

The policy objective of the NESCS is to ensure land affected by contaminants in soil is appropriately identified and assessed when soil disturbance and/or land development activities take place and, if necessary, remediated or the contaminants contained to make the land safe for human use.

The PSI provides a comprehensive review of land affected by the project and which pieces of land are required to be subject to a DSI based on desktop investigations and site walkovers. It considered that the PSI appropriately identifies land covered by the NESCS on this basis.

¹ [Appendix 9.4.12 – Preliminary Site Investigation Report – Takitimu Northern Link Stage 2](#)

The proposal to undertake a DSI on a site-by-site basis is considered a pragmatic response to the character and scale of the project and, in conjunction with appropriate conditions, will implement the policy objective of the NESCS.

We understand the preferred approach to the project is that review and certification of DSIs, Contaminated Site Management Plans (**CSMPs**), Remediation Action Plans (**RAPs**) and Site Validation Reports (**SVRs**) will be undertaken by BOPRC with copies of the certified documents to be provided to WBOPDC for their records. This approach is preferred because:

- For this project there is comprehensive regional and district council cross over on the contaminated land issues that are required to be assessed under the NESCS and RNRP.
- BOPRC already have contaminated land technical expertise in house which provides a more efficient and effective pathway for certification of technical documents.

Contaminated Land – Proposed Conditions

The most recent version of proposed conditions provided by the applicant are included in Attachment 1 (with comments where relevant). Key points are summarised as follows:

- **General** – The condition structure is consistent with the proposed approach in that a DSI will be completed in the first instance, and this will be used to inform the CSMP, RAP and SVR methodology.
- **Certification of Management Plans²** – As noted above providing a Management Plan to WBOPDC for certification adds limited value to process and managing contaminated land effects. This is because that level of technical expertise does not ‘sit’ within WBOPDC.
- **Deemed Certification** – Section 3 identifies how a Management Plan will be deemed to be certified. This includes a scenario where no Management Plan has been submitted to WBOPDC and no response is received in return. The condition appears ultra vires on this basis.
- **CSMP** – The conditions under Section 6 give effect to purpose and content of site management plans as identified under CLMG No.1, Section 2.4.
- **RAP** – The conditions under Section 7 give effect to purpose and content of remediation action plans as identified under CLMG No.1, Section 2.7.
- **SVR** – The conditions under Section 8 give effect to purpose and content of site validation reporting as identified under CLMG No.1, Section 2.8.

Closing Comments

The draft conditions are consistent with the project approach and provide a framework for managing the effects of contaminated land in accordance with the NESCS.


However, as currently drafted it appears the conditions have the potential to set up a duplication of process which is not efficient or effective for either the applicant or WBOPDC.

Based on correspondence with BOPRC staff to date we understand the applicant has presented a similar set of conditions to BOPRC to address RNRP matters. This includes requirements to submit DSIs, CSMPs, RAPs and SVRs and to obtain certification of those documents. In that context there seems to be limited value in also providing those documents for certification to WBOPDC, when WBOPDC is ultimately interested in having those documents on record for the purpose of managing future land uses within its jurisdiction.

² Defined in Draft Conditions Appendix 1

In our opinion it would be preferable for this project to provide a single certification pathway at regional council level with those certified documents then being provided to WBOPDC.

Please contact the undersigned if further clarification is required.



James Danby
Consultant Planner
iPLAN Ltd

Attachments:

1 – Proposed Conditions

DOCUMENT NOW TAKEN OFFLINE – DO NOT EDIT

Takitimu North Link Stage 2 – Draft Resource Consent Conditions – NES-Soil (October 2025)

CONTENTS

1	Purpose.....	2
2	Management Plans	2
3	Deemed certification of Management Plans	2
4	Management Plan(s) for Enabling Works	3
5	Detailed Site Investigation	3
6	Contaminated Site Management Plan	3
7	Remedial Action Plan.....	4
8	Site Validation Report	4
ADVICE NOTES		5
APPENDIX 1 - DEFINITIONS.....		6
APPENDIX 2 – SITES REQUIRING A DSI		8

1 Purpose

- 1.1 This resource consent authorises the Consent Holder to undertake soil disturbing activities pursuant to the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (Clause 11) for the construction of the Project, with an expiry date in 20 years, and a lapse date in 20 years (after the date of commencement of the Consent).
- 1.2 Pursuant to section 123 of the RMA and Schedule 5, cl 26 of the FTA the lapse and expiry date is as set out in **Condition 1.1** unless the Consent has been given effect to, surrendered or cancelled at an earlier date.

2 Management Plans

- 2.1 The Consent Holder shall prepare, submit to WBOPDC and implement the Management Plans (as defined in Appendix 1), in accordance with the decision pathway, timeframe and duration as specified in the relevant conditions of consent. If WBOPDC advises (within the relevant timeframe) that a Management Plan that has been provided to the WBOPDC for certification is not suitable to certify and provides reasons for this, the Consent Holder shall re-submit the Management Plan to WBOPDC for certification in accordance with the requirements as specified in the relevant condition addressing that Management Plan.
- 2.2 **Conditions 2.3 – 4.3** apply to all plans defined as a 'Management Plan' in Appendix 1 (unless stated otherwise).
- 2.3 The preparation of all Management Plans shall be undertaken by a SQEP (unless stated otherwise).
- 2.4 The Consent Holder may prepare Management Plans in parts to address specific activities or to reflect the staged implementation of Project Works.
- 2.5 The Consent Holder may update a Management Plan by submitting the amendment in writing to WBOPDC for certification or for information in accordance with the requirements as specified in the relevant condition addressing that Management Plan.
- 2.6 The Consent Holder shall ensure that Management Plans, including any amendments, are accessible on-site and updated within 10 Working Days of any amendments being certified by WBOPDC or provided to WBOPDC for information.
- 2.7 The Consent Holder shall provide drafts of the Management Plans (as defined in Appendix 1) to Pirirākau and Ngāti Taka before the Management Plan is to be provided to WBOPDC in accordance with the corresponding timeframe requirement in the relevant Management Plan condition and shall provide at least 10 Working Days for their comments. The Consent Holder shall consider any written feedback received from Pirirākau and Ngāti Taka and incorporate suggestions from the written feedback as the Consent Holder considers appropriate. The relevant Management Plan shall include a summary of written feedback received from Pirirākau and Ngāti Taka, and outline how feedback has been incorporated into the Management Plan and, if not, the reasons for that.

Commented [JD1]: WBOPDC or BOPRC certification

3 Deemed certification of Management Plans

- 3.1 The Consent Holder shall not commence any Project Works (Construction Works, or Enabling Works, as applicable to the relevant Management Plan) within an area to which Management Plan condition(s) apply until the **certified** Management Plan has been provided to WBOPDC for information as specified in accordance with the relevant condition.
- 3.2 If the applicable Management Plan (or amendment) required under these conditions has been submitted to WBOPDC for certification in accordance with the relevant condition, and the number of Working Days specified in the condition for submission of the Management Plan to WBOPDC has passed, and WBOPDC has not certified the Management Plan (or amendment), or advised that the Management Plan (or amendment) is not suitable to certify, the Management Plan will be deemed to have been certified and the Consent Holder may commence Project Works in accordance with the applicable Management Plan (or amendment) as submitted.

Deleted: required

Deleted: certified or otherwise

Commented [JD2]: Assumed certification?

4 Management Plan(s) for Enabling Works

- 4.1 Where a Management Plan is required to be prepared before the start of Project Works by a condition of this Consent, the Consent Holder may prepare an area or activity-specific Enabling Works version of that Management Plan(s) to authorise the Enabling Works covered by that Management Plan condition(s). A subsequent Management Plan will need to be prepared before the start of the remaining Project Works subject to those Management Plan condition(s).
- 4.2 Any Enabling Works version of a Management Plan shall be prepared in general accordance with the requirements of the applicable Management Plan condition(s), with the scope modified to be commensurate with the nature, scale and effects of the proposed Enabling Works and include an explanation of how it will be incorporated into any subsequent Management Plan(s).
- 4.3 At least 20 Working Days before the start of the relevant Enabling Works, the Enabling Works version of that Management Plan shall be provided to WBOPDC for information, or for certification that it complies with the relevant conditions.

5 Detailed Site Investigation

- 5.1 The Consent Holder shall prepare a **Detailed Site Investigation** report (DSI) for each site identified as requiring a DSI in Tables A and B of Appendix 2 to these conditions. The purpose of the DSI report is to confirm the level of contamination at the PSI sites. The DSI shall be prepared in accordance with CLMG1 and CLMG5.
- 5.2 At least 40 Working Days before the start of contaminated land disturbance activities, the DSI shall be submitted to WBOPDC for information.

Commented [JD3]: Table B - typo??

Commented [JD4]: Information only

6 Contaminated Site Management Plan

- 6.1 The Consent Holder shall prepare a **Contaminated Site Management Plan (CSMP)**. The purpose of the CSMP is to identify contaminated sites within the Designation Boundary, and identify measures to manage potential risks from disturbance of contaminated soils to the health of workers and the environment.
- 6.2 The CSMP shall:
- Identify sites where contamination is expected to be present, as identified in the DSI, including details on the type and extent of the contamination, and whether remediation is considered to be required.
 - Include site management protocols for management of contamination, including pre-Construction Works site set-up, soil excavation / disturbance procedures, soil reuse / management (procedures to reuse, place and cap unwanted topsoil that exceeds clean fill criteria), imported materials, groundwater procedures, health and safety procedures and measures for transport and disposal of contaminated soils, and ESC methodologies.
 - Include specific site management protocols for disturbance of any asbestos contaminated soils, including an Asbestos Removal Control Plan.
 - Where practicable, require all ESC measures to be installed prior to the commencement of the excavation of contaminated soils.
 - Set out measures for temporary stockpiling of excavated contaminated material, where temporary stockpiling cannot be avoided, to ensure as far as practicable that contaminants are effectively bunded and imperviously covered so as to prevent contaminants leaching into uncontaminated ground.
 - Where contaminated soil is to remain onsite, measures to ensure the contaminated soil remains in situ, as far as practicable, and ongoing survey requirements subsequent to the completion of soil disturbance works to ensure that contaminated soil has not spread.
 - Include health and safety and environmental management procedures to be implemented (at locations where soil sampling has indicated that contamination is expected) during the Project Works, including but not limited to:
 - Personal protection and monitoring;

Commented [JD5]: What if DSI returns soil below SCS?

Commented [JD6]: Wording - the DSI does that.

Commented [JD7]: Job of the DSI?

- 2. On-site soil management practices, including stockpile management and stormwater and sediment controls; and
 - 3. Off-site soil transport and disposal.
 - (h) Include contingency measures to apply in the event of accidental/unexpected discovery of contaminated soils during Project Works to safely manage unexpected contamination.
 - (i) Be prepared in accordance with the requirements of the CLMG1.
- 6.3 At least 30 Working Days before the start of contaminated land disturbance activities, the CSMP shall be submitted to WBOPDC **with certification from a SQEP** that the CSMP satisfies the requirements of **Condition 6.2**.
- 6.4 The Consent Holder shall implement the CSMP for the duration of Construction Works, with survey requirements extending beyond Construction Works, as determined by a SQEP.

Deleted: for certification

Commented [JD8]: Necessary?? Does WBOPDC have the skill set??

7 Remedial Action Plan

- 7.1 If the CSMP identifies contaminated soils requiring remediation within the Designation Boundary, the Consent Holder shall prepare a **Remedial Action Plan (RAP)**. The purpose of the RAP is to identify a remedial strategy and controls to mitigate the risk posed by any contaminants identified in the CSMP.
- 7.2 The RAP shall be prepared in accordance with the requirements of section 2.7 of the CLMG1.
- 7.3 The RAP shall include:
- (a) The remediation or management goal;
 - (b) Remediation methodology, including rationale, with a clear and systematic outline plan of works;
 - (c) Contingency measures if the remediation methodology fails to reach the remediation or management goal; and
 - (d) Proposed site validation sampling plan and reporting.
- 7.4 At least 30 Working Days before the start of Project Works in an area identified in the CSMP, the RAP shall be submitted to WBOPDC **with certification from a SQEP** that it satisfies the requirements of Conditions 7.2 and 7.3.
- 7.5 The certified RAP shall be implemented for the duration of the Project Works in the areas identified by the CSMP.

Commented [JD9]: DSI does the identifying.

Deleted: for certification

Commented [JD10]: Necessary?

8 Site Validation Report

- 8.1 Following completion of Project Works in an area to which a RAP applies, the Consent Holder shall prepare a **Site Validation Report (SVR)**. The purpose of the SVR is to validate that the objectives of the RAP have been achieved.
- 8.2 The SVR shall be prepared in accordance with the requirements of section 2.8 of CLMG1.
- 8.3 The SVR shall include:
- (a) The location and dimensions of the excavations (of contaminated soils) carried out, including a relevant site plan, and records of where any contaminated soil is to remain on site;
 - (b) Records of any unexpected contamination encountered during the Project Works;
 - (c) Soil sampling / validation results where remediation has been carried out or where unexpected contamination has been encountered;
 - (d) Copies of the disposal dockets for the material removed from the Designation Boundary and any clean fill imported onto the Designation Boundary; and
 - (e) The requirements for ongoing monitoring and management (if any contamination is contained within the Designation Boundary).

- 8.4 Within two months of Completion of Construction Works in an area to which a RAP applies, the SVR shall be submitted to WBOPDC ~~with certification from a SQEP~~ that it satisfies the requirements of **Conditions 8.2 and 8.3.**

Deleted: for certification

ADVICE NOTES

- 1 For the avoidance of doubt, the deemed certification process in **Condition 3** applies to Management Plan(s) for Enabling Works.
- 2 A resource consent from Bay of Plenty Regional Council is also required for activities relating to soil disturbance activities. That consent also includes the conditions of this Consent. Compliance with the conditions of this Consent may also constitute compliance with the conditions of that consent. The Consent Holder may prepare one DSI, CSMP, RAP, SVR that meets the conditions of this Consent and that Bay of Plenty Regional Council consent, or separate ones.

draft

APPENDIX 1 - DEFINITIONS

The table below defines the acronyms and terms used in these conditions. Defined terms are capitalised.

Abbreviation/term	Meaning/definition
Clean fill	Has the same meaning as in the ' <i>The WasteMINZ Technical Guidelines for Disposal to Land Version 3.1 (2023)</i> '.
CLMG1	Ministry for the Environment <i>Contaminated land management guidelines No 1: Reporting on contaminated sites in New Zealand</i> (Revised 2021).
CLMG5	Ministry for the Environment <i>Contaminated land management guidelines No 5: Site investigation and analysis of soils</i> (Revised 2021).
Completion of Construction	When construction of the Project (or the relevant part of the Project) is complete, and the Project (or the relevant part of the Project) is operational.
Consent	The consent that these conditions apply to.
Consent Holder	New Zealand Transport Agency Waka Kotahi
Construction Works	Activities undertaken to construct the Project, excluding Enabling Works.
Designation	Designation D203 (Road purposes – State Highway 2) and Designation D181 (Road for access to State Highway 2) in the Western Bay of Plenty District Plan.
Designation Boundary	The boundary of the area of land subject to the Proposed Designation.
Enabling Works	<p>Preparatory works and investigations to enable Construction Works, including the following activities:</p> <ul style="list-style-type: none"> • Archaeological investigations • Geotechnical investigations • Formation of access for site investigations • Establishing construction yards and offices • Constructing and sealing (if necessary) access roads and accesses to private properties and the Project • Contaminated land investigations • Demolition or removal works, including contaminated land clearance • Fencing • Vegetation protection or removal works • Protection and relocation of utilities • Establishment of mitigation measures (such as screen planting) for Enabling Works

Abbreviation/term	Meaning/definition
ESC	Erosion and Sediment Control
FTA	Fast Track Approvals Act 2024
Management Plan(s)	<p>The following plans and reports (which are collectively referred to as Management Plans):</p> <ul style="list-style-type: none"> • Detailed Site Investigation • Contaminated Site Management Plan • Remedial Action Plan if required under Condition 7.1 • Site Validation Report if required under Condition 8.1
Project	The construction, operation and maintenance of Takitimu North Link Stage 2.
Project Works	All Enabling Works and Construction Works.
RMA	Resource Management Act 1991
SQEP	Suitably Qualified Experienced Person - a person (or persons) who can provide sufficient evidence to demonstrate their suitability and competence in the relevant field of expertise.
WBOPDC	Western Bay of Plenty District Council
Working Day	<p>A day of the week other than—</p> <ul style="list-style-type: none"> (a) Saturday, a Sunday, Waitangi Day, Good Friday, Easter Monday, Anzac Day, the Sovereign's birthday, Te Rā Aroki a Matariki/Matariki Observance Day, and Labour Day; and (b) if Waitangi Day or Anzac Day falls on a Saturday or a Sunday, the following Monday; and (c) a day in the period commencing on 20 December in any year and ending with 10 January in the following year.

APPENDIX 2 – SITES REQUIRING A DSI

Key:

No DSI required
DSI required: HAIL A.10 – (orchard only, no storage sheds etc.) Contaminants reasonably expected above background levels in some soils.
DSI required: All other land uses where HAIL identified, including orchards with storage sheds.
Elevated levels of contaminants reasonably expected in some site soils.

Table A: Land parcels on-site requiring a DSI (privately owned)

Current Legal Description	Property ID Code	Land Parcel Name Allocated for the Purpose of this PSI	More likely than not that HAIL activities occurred on the area of site impacted by the proposed road designation?	DSI Required?	Identified Contaminants of Concern
Part allot 75 Te Puna Psh	36		No.	No	-
Lot 2 DPS 76152	37	1205/6	Yes HAIL A.10.	Yes	Metals, OCP
Lot 3 DPS 76152	38	1205/7	Yes - HAIL A.10 (on the encroaching orchard area only), potential HAIL A.1 (fill point – adjacent site), HAIL E.1, HAIL I (sheds – adjacent site)	Yes	Metals, OCP, asbestos
Lots 1 & 2 DPS 5073	39	3002/452	Yes - HAIL F.4, HAIL F.7, HAIL A.17, potential for HAIL E.1, HAIL I	Yes	Metals, asbestos, hydrocarbons
Lot 3 DPS 10643	41	1205/24	Yes - HAIL A.10, potential for HAIL E.1, HAIL I on suspected historic house site	Yes	Metals, pesticides, asbestos
Lot 1 DPS 29552	42	1207/285	Yes - HAIL A.10 (on orchard area), potential HAIL E.1, HAIL I (around shed), HAIL A.1 (fill Point)	Yes	Metals, OCPs
Lot 3 DPS 29552	43	3002/2	Yes - HAIL A.10, potential HAIL E.1, HAIL I (Shed only)	Yes	Metals, pesticides, asbestos
Lot 2 DPS 29552	45	1207/165	Yes- HAIL A.10	Yes	Metals, OCP
Lot 1 DPS 27924	46	3002/341	Yes- HAIL A.10	Yes	Metals, OCP
Lot 1 DPS 509914	47	3002/260	Yes - HAIL A.10	Yes	Metals, OCP
Lot 1 DPS 49164	48	3002/59	Yes - potential HAIL E.1, HAIL I, HAIL A.17, HAIL A.1, HAIL A.6	Yes	Asbestos, metals
Lot 1 DPS 34018	49	3002/61	Yes - Potential HAIL E.1, HAIL I, HAIL F.8, HAIL A.1, HAIL A.17	Yes	Asbestos, metals, hydrocarbons
Lot 1 DPS 90796	50	3002/185	Yes - HAIL A.10	Yes	Metals, OCP
Lot 3 DPS 38759	51	3002/45	No.	No	-
Lot 1 DPS 29812	53	3002/21	Yes - HAIL A.10, potential for HAIL I	Yes	Metals, OCP
Part 2 DPS 56303	54	3002/3	No.	No	-
Lot 2 DPS 61605	55	1203/42	No.	No	-
Lot 1 DPS 67894	56	1203/72	Yes - HAIL A.10 (orchard area only)	Yes	Metals, OCP
Section 3 SO 557694	59	1207/351	Yes - HAIL A.10 (orchard area only)	Yes	Metals, OCP
Lot 3 DPS 28670	60	3003/11490	No.	No	-
Lot 1 DPS 28670	63	1203/130	Yes - HAIL A.10, potential for HAIL A.1 (fill point only)		Metals, OCP
Lot 2 DPS 70802	64	1203/5	Yes - HAIL A.10 (on the encroaching orchard area only).	Yes	Metals, OCP
Lot 4 DPS 70802	65	1203/7	Yes - HAIL A.10, potential for HAIL I	Yes	Metals, OCP
Lot 1 DPS 71072	105	1203/1	No.	No	-

Current Legal Description	Property ID Code	Land Parcel Name Allocated for the Purpose of this PSI	More likely than not that HAIL activities occurred on the area of site impacted by the proposed road designation?	DSI Required?	Identified Contaminants of Concern
Lot 1 DPS 311691	106	1203/53	Yes - HAIL A.10 (orchard area only)	Yes	Metals, OCP
Lot 2 DPS 454121	108	1207/289	No.	No	-
Lot 2 DPS 563502	114	3002/274	Yes - HAIL E.1, HAIL I, potential HAIL A.10	Yes	Asbestos, metals, OCPs
Lot 2 DPS 28670	66	3003/11255	Yes - potential for HAIL I	Yes	Metals, OCP
Lot 1 DPS 370230	67	3003/47	No.	No	-
Lot 2 DPS 370230	68	3003/48	No.	No	-
Lot 6 DPS 12952	69	3003/11072	No.	No	-
Lot 2 DPS 12952	70	3003/11032	Yes - HAIL E.1, potential HAIL A.10	Yes	Asbestos, metals, OCPs
Lot 1 DPS 353725	71	1210/78	Yes - HAIL G.5, potential for HAIL E.1 and HAIL I	Yes	Asbestos, metals, OCP, hydrocarbons
Lot 2 DPS 353725	72	1210/79	Yes - HAIL I	Yes	Metals
Lot 1 DPS 12952	73	1210/477	Yes - HAIL A.10	Yes	Metals, OCP
Lot 1 DPS 12236	75	1210/170	Yes - HAIL A.10, potential for HAIL E.1 and HAIL I	Yes	Asbestos, metals, hydrocarbons
Allot 380 Te Puna Psh Section 1 SO 492478	78	1210/2	Yes - HAIL B.4, potential for HAIL E.1 and HAIL I	Yes	Asbestos, PCBs, metals, hydrocarbons
Lot 1 DPS 190	80	1210/20	Yes - Potential for HAIL E.1, HAIL I	Yes	Asbestos, metals
Lot 1 DPS 28825	81	1213/1	Yes - HAIL A.8, HAIL A.10 and HAIL G.5 (timber storage areas only)	Yes	metals, OCP
Lot 1 DPS 55363	84	3003/9852	Yes - HAIL A.10 (orchard area only)	Yes	Metals, OCP
Lot 4 DPS 71883	98	1211/5	Yes - HAIL A.10	Yes	metals, OCP
Allot 283 Te Puna Psh	101	1209/907	No.	No	-
Lot 2 DPS 80612	102	1209/6	No.	No	-
Lot 1 DPS 67841	109	1210/301	No.	No	-
Lot 1 DPS 48400	110	1210/290	Yes - HAIL E.1, HAIL A.10 (orchard area only)	Yes	Asbestos, metals, OCPs
Lot 1 DPS 55964	115	1210/390	No.	No	-
Lot 3 DPS 28825	87	3003/9332	No.	No	-
Lot 1 DPS 63246	88	3003/9431	Yes - potential for HAIL H and HAIL I from fill, HAIL A.10 (orchard area only)	Yes	Asbestos, metals, OCPs, hydrocarbons
Lot 2 DPS 475801	89	1187/101	Yes - HAIL A.10, potential for HAIL E.1, HAIL I	Yes	Asbestos, Metals, OCP
Lot 4 DPS 44151	91	1857/952	No.	No	-
Part Allot 2058 Te Puna Psh	94	3003/8385	Yes - Potential for HAIL E.1 and HAIL I, HAIL A.10	Yes	Asbestos, metals, OCP
Allot 331 Te Puna Psh	95	3003/8615	No.	No	-
Lot 1 DPS 84565	96	1216/14	Yes - HAIL A.10, D5, potential for E.1 and HAIL I	Yes	Asbestos, metals, OCP
Lot 105 DP 518597	1	1 (Lot 105 DP 518597)	Yes - HAIL I and HAIL A.10.	Yes	Metals and OCP
Lot 8 DP 518597		1 (Lot 8 DP 518597)			
Lot 104 DP 518597	3	3 (Lot 104 DP 518597)		Yes	Metals and hydrocarbons.