

Before the Expert Panel appointed under the Fast-track
Approvals Act 2024

FTAA-2604-1207

Under the Fast-track Approvals Act 2024 (FTAA)

In the matter of the Southern Link Inland Port

By Southern Link Property Limited

**STATEMENT OF EVIDENCE BY ROGER OAKLEY ON BEHALF OF SOUTHERN LINK
PROPERTY LIMITED**

WASTEWATER ASSESSMENT, NON POTABLE AND POTABLE WATER ASSESSMENT

19 August 2026



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1. INTRODUCTION

1.1 My full name is Roger Oakley. My qualifications and experience, and my role in the Southern Link Inland Port Project (**SLIP** or **Inland Port**) are set out in the “Non-Potable and Potable Water Assessment” and “Wastewater Assessment” reports both dated 16 April 2026, Section 2, which is included in Part B.14 and B.15 of the substantive application for the SLIP.

1.2 I have been asked by Southern Link Property Limited (**SLPL**) to provide a response to specific matters within my areas of expertise contained in written comments on the SLPL application from persons invited by the Panel to comment under s 53 of the FTAA.

1.3 The topics I cover are comments contained in the Treaty Impact Assessment for the Proposed SLIP, Section 5.5.3 authored by Dr Gail Tipa from Tipa and Associates Ltd on behalf of Te Rūnanga o Ōtākou (**TIA**). I understand the TIA is relied on in the comments received from Te Rūnanga o Ōtākou.

Code of Conduct

1.4 I confirm that I have read the Code of Conduct for Expert Witnesses contained in section 9 of the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

2. TREATY IMPACT ASSESSMENT, SECTION 5.5.3

Adequacy of Mosgiel WWTP and network capacity to accommodate Inland Port wastewater flows alongside existing network issues and planned residential growth

2.1 The TIA seeks confirmation that the Inland Port wastewater contribution to the current Mosgiel WWTP and wastewater network will not have an impact on the current network which they understood already has issues,

or that this has been considered by Dunedin City Council (**DCC**) in their infrastructure upgrade planning alongside residential development.¹

2.2 This evidence is in addition to the information already provided in documented DCC confirmation (refer to s5 of Wastewater App B14 of the Substantive Application) that there is capacity in the wastewater network to accept the wastewater flow demand from the SLIP, subject to certain requirements.

2.3 The wastewater design will include one of the requested options for connecting into the DCC system. That is, either a larger pipe will be installed between the first manhole and FSM08601, or the Inland Port will connect directly to FSM08601. The pipe downstream of FSM08601 is a 300mm pipe. The selected option will be confirmed during detailed design. The wastewater design includes limiting of trade waste flows in heavy rainfall and good practice measures to control wet weather flow from the development.

Absence of confirmed DCC approval of the proposed wastewater connection and treatment system

2.4 The TIA raises concerns that there is no mention of a DCC response on the wastewater system. The TIA noted there is pre application advice mentioning wastewater as part of 3 waters but no mention of DCC response on the final system. It notes that at the time of writing, the options to resolve DCC requirements were being investigated.²

2.5 In addition to the information already provided, the wastewater design will include one of the requested options for connecting into the DCC system. That is, either a larger pipe will be installed between the first manhole and FSM08601, or the Inland Port will connect directly to FSM08601. The pipe downstream of FSM08601 is a 300mm pipe. The selected option will be confirmed during detailed design. The wastewater design includes limiting

¹ TIA, page 51,

² TIA, page 52.

of trade waste flows in heavy rainfall and good practice measures to control wet weather flow from the development.

Uncertainty over the wastewater pre-treatment method, including whether a universal pollutant trap (UPT) will be used

- 2.6** The TIA raised concerns on the wastewater pre-treatment solution and the need for using a UPT (universal pollutant trap).³ The use of a UPT has not been confirmed, as a UPT is not the only method for treating stormwater. However, pretreatment will be implemented. The design of the pre-treatment system will be completed during the detailed design phase, and will ultimately be matched to expected contaminants.

Risk of wastewater/washbay overflow into stormwater ponds and subsequent discharge to the Silver Stream affecting taonga species and water users

- 2.7** The TIA raised concerns on the impact on taoka species and those using Whakaehu if wastewater overflow discharges to the stormwater ponds and then discharges into the Silver Stream.⁴ In my opinion, the risk that surcharge from the container washbay system results in contamination of the Whakaehu is acceptably low. The container washbay has been specifically designed to minimise the potential for washdown contaminants to enter the stormwater network. The washbay system is designed to contain washdown runoff and rainfall generated by storm events up to a 10% AEP (RCP8.5, 2080-2100) design storm event.

- 2.8** This means that under normal operating conditions, all washdown wastewater, together with rainfall falling on the washbay area, is collected, pre-treated, and attenuated before being discharged to the DCC wastewater network as trade waste. Overflow from the washbay system to the stormwater network would only occur during storm events greater than the design storm event (a 10% AEP RCP 8.5 2080-2100 storm). In these circumstances, the system has been designed to capture and retain the

³ TIA, page 53.

⁴ TIA, page 54.

initial runoff "first flush" prior to any surcharge occurring. The time it takes the system to surcharge during storm events that are larger than the design storm will vary.

- 2.9** As an example, the attenuation system would provide sufficient capacity to capture flows from the first 20-30 minutes of a 1% AEP RCP 8.5 2080-2100 storm. This equates to a rainfall depth of around 25 – 30 mm over the container washbay catchment area. This initial rainfall, or first flush, would be captured, treated, attenuated, and discharged to the DCC wastewater system. As a result, the portion of runoff most likely to contain residual contaminants on the washbay surface would be directed to the wastewater network rather than the stormwater system.
- 2.10** Potential contaminants associated with container washing may include suspended solids, hydrocarbons, trace metals and residual cleaning products such as surfactants, detergents and degreasers. The specific contaminant profile will depend on the types of containers being cleaned and the cleaning products used. In the rare storm events large enough to trigger an overflow, the specific residual contaminants would be further diluted by rainfall from the entire site in the stormwater attenuation pond (a 25,000 m³ volume) and flows within the Silver Stream (greater than 160 m³/s).
- 2.11** Consent Condition B.34 requires that water quality samples are collected from the Silver Stream within one week of any surcharge from the container washbay wastewater system. Additional mitigating factors include 1). The container washbay will be located at a localised highpoint to minimise the catchment draining to the container washbay wastewater system. 2). Container washing would not occur during an extreme storm event exceeding the washbay design capacity, as this would be highly impractical operationally for staff welfare and safety reasons and because if surcharging ultimately occurred it would be very impractical to use the washbay as water would not drain away causing ponding within the washbay. 3). The stormwater attenuation pond itself is a good emergency

backstop contingency measure that would be used between a spill and the receiving environment.

Risk of odour and septicity in the wastewater network during construction

- 2.12** The TIA raised concerns that there was no mention in the draft report of potential mitigations if odour / septicity becomes an issue. In my opinion, the risk of odour and septicity is very low.⁵ The early connections to the wastewater system will be those closest to the pump station, reducing the risk of long residence time within the network. Furthermore, the system is designed as a gravity system, which means that pipes are not full. This means that the wastewater flow is aerated, which mitigates the risk of septicity. In the unlikely event of odour issues, subsequent mitigation could include more regular flushing of the system, or in extreme cases, the fitting of odour filters to manholes and the pumpstation. Appropriate odour filters are commercially available from a number of suppliers.

Risk of waterway contamination from fire suppression water mixing with industrial materials during a fire event

- 2.13** The TIA raised concerns on the contamination risk to waterways in a fire event where fire suppression water is mixed with industrial materials.⁶ Addressing this concern primarily relates to stormwater management and will principally be addressed in the evidence of Nick Keenan (refer his section 4). Firefighting water is provided by the SLIP non-potable water scheme fed from three 400m³ tanks, giving a total volume of 1,200m³. In comparison, the total stormwater attenuation pond volume is around 25,000m³.
- 2.14** Firefighting water will ultimately drain via the stormwater network, or overland through the site, to the stormwater attenuation ponds. The method of using the stormwater attenuation ponds to manage firefighting runoff until the water can be removed or treated will be confirmed during

⁵ TIA, page 55.

⁶ TIA, page 59.

detailed design. Nick Keenan advises that firefighting water will be regarded in the same way as a spill. This will be addressed in the Spill Response Plan for the site that is required under DCC Consent Conditions 47 and 48 and Otago Regional Council Consent Conditions 26 and 27. The spill response plan will developed by the stormwater designers.

3. CONCLUSION

- 3.1** The comments from Dr Gail Tipa from Tipa and Associates Ltd in the TIA for the Proposed SLIP do not change my views expressed in the Wastewater Assessment and Non-Potable and Potable Water Assessment.

Dated: 19th August 2026



Roger Oakley