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**APPLICATION BY SOUTHERN LINK PROPERTY LIMITED FOR THE SOUTHERN LINK  
INLAND PORT**

**SUMMARY STATEMENT OF DR BENJAMIN RICHARD WATERHOUSE ON BEHALF OF  
OTAGO REGIONAL COUNCIL**

**11 September 2026**

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**1. INTRODUCTION**

- 1.1 My full name is Dr Benjamin Richard Waterhouse
- 1.2 I am employed by Beca Limited as a Senior Associate Environmental Scientist, based in Christchurch.
- 1.3 I hold a Doctor of Philosophy (PhD) in Ecology (mine restoration) from Lincoln University, New Zealand; and a Bachelor of Science (BSc with Honours) in Environmental Biology from the University of Plymouth, United Kingdom.
- 1.4 I am a Certified Environmental Practitioner (CEnvP) with Site Contamination Specialist certification (CEnvP-SC).
- 1.5 My experience in research and professional practice in environmental science and ecology is over 15 years, with the majority of my experience being in contaminated land in New Zealand.
- 1.6 I have read the Code of Conduct for Expert Witnesses in giving evidence to the Environment Court. I agree to comply with that code when giving evidence to the Hearing Panel in this matter. All my evidence is within my expertise, and I have considered and stated all material facts known to me which might alter or qualify the opinions I express.

**2. SCOPE OF STATEMENT**

- 2.1 In February 2026 I was engaged by Otago Regional Council (ORC) to undertake a technical review of contaminated land aspects of the submitted application documents provided by Dunedin City Council (DCC) Southern Link Inland Port (SLIP) project Fast Track Approvals Act application. Subsequently, I have also been asked to consider some aspects of management and risk associated with operational phase stormwater discharge to land, alongside my colleagues Mike Thorley, Kah Mun (Raymond) Chang and Emily Lion-Cachet (their statements to be supplied separately). I note that

management of stormwater treatment and quality, discharge quality, ecological effects etc., is excluded from my statement as it is reviewed by others. The focus for my statement is soil contamination risk and management.

2.2 In preparing this evidence I have reviewed the following documents:

Environmental Consultants Otago 2025 Limited (EC Otago). Detailed Site Investigation 270-292 Dukes Road North Mosgiel for Southern Link Property Limited. April 2026. Herein referred to as the 'DSI'.

EC Otago. Contaminated Site Management Plan: 270-292 Dukes Road North, Mosgiel version 1.0 17 February 2026. Herein referred to as the 'CSMP'.

EC Otago. Remedial Action Plan 270-292 Dukes Road North Mosgiel for Southern Link Property Limited. April 2026. Herein referred to as the 'RAP'.

Various draft consent conditions iterations for ORC.

Southern Link Inland Port Mark Scaife – for SLPL – Summary Statement on Groundwater 10 September 2026

### 3. SPECIALIST ASSESSMENT

3.1 My initial review of the DSI, CSMP, and RAP, and subsequent s53 response summarises my concerns and indicative solutions with regard to site contamination assessment and management. As communicated in my correspondence and reviews to date, it is my opinion that the outstanding risk can be managed with effective consent conditions, and suitable regulator oversight through review and certification of additional investigation Sampling and Analysis Plan(s), management plans, RAP (once finalised), and Site Validation Report (SVR). I also recommended in previous correspondence that stormwater management devices such as swales and basins are assessed from a contamination perspective.

3.2 My review of Mark Scaife's Summary Statement on Groundwater identifies commentary on discharges of stormwater to contaminated land. Mark Scaife states that a CSMP and RAP is already required to be lodged with ORC for certification, and that 'any and all' contaminated soils will be removed from the attenuation pond 'given the significant excavation depth'. It is not clear whether the statement assumes the RAP will deal with contaminated soils in the basin and swale location, or that the depth of proposed excavation alone is sufficient, or both.

3.3 I agree in principle that removal of contaminated soils would reduce the contaminant load leaching into groundwater. However, the means by which this is achieved and/or measured is not fully described by Mark Scaife or controlled for in the proposed consent conditions. For example, there is no proposed baseline sampling and testing and/or synthetic precipitation leaching procedure testing of the base of the swale or attenuation basin to demonstrate soil quality suitability prior to commissioning; there are no proposed baseline criteria against which to compare the testing; and there is no monitoring or safeguard to check swale or attenuation basin soil quality after extended

use and potentially repeated discharges of trade wastewater (as is proposed in the consent conditions) during high rainfall events.

#### **4. COMMENTS ON PROPOSED CONDITIONS**

- 4.1 Regarding my previous comments on the adequacy and completeness of site contaminated land investigations, Resource Consent A conditions have largely been agreed, and can be used to manage the outstanding risks.
- 4.2 For operational stormwater discharges, the following recommendations are made:
- (a) consent conditions include for the assessment of baseline soil conditions in the footprint of swale(s) and basin(s) to provide a basis against which future monitoring can be compared, and to demonstrate that the point of infiltration is suitable for that purpose prior to commissioning.
  - (b) the applicant includes in a stormwater monitoring plan the potential effects from accumulation of contaminants in soil over time.
- 4.3 For both contaminated land matters and operational stormwater discharge to land, should remedial and/or baseline soil quality criteria not be met, a contingency plan should be developed following the relevant national guidance frameworks.

Criteria and frequency for the above can be agreed as part of consent condition negotiations.

#### **5. CONCLUSIONS**

- 5.1 Overall, it is my opinion that risk from stormwater discharged to potentially contaminated land can be managed with robust baseline testing and operational phase monitoring compared to suitable criteria. As this is not currently provided for in the current consent conditions it is recommended that the consent conditions are updated to include such provisions. Remaining contaminated land matters can be managed through consent conditions, and expert review through regulator certification requirements already included in the conditions.



**Dr Benjamin Richard Waterhouse**

11 September 2026