

APPENDIX 7

Memo

Date	29 th April 2026
To	Nirosha Seelaratne
CC	-
From	Hana Christenson

Woodend Bypass Review of NESCS Conditions

Qualifications:

I am a senior scientist in the Contaminated Land and Waste Team at Environment Canterbury. I hold a Bachelor of Science in Chemistry with first class honours, and a Doctor of Philosophy in Antarctic Studies. I have ten years of professional experience completing research, consulting and regulatory work on the geochemistry of contaminants in the environment. I have been a senior scientist in the Contaminated Land and Waste Team at Environment Canterbury for two years where responsibilities include providing technical advice on consents, project work and development of guidance to support decision making.

Introduction:

I was requested to review the proposed conditions together with application documentation for the Woodend Bypass NESCS consent. I provide the below technical advice to Waimakariri District Council to support their assessment of the application and the proposed conditions. I have also provided advice to Canterbury Regional Council planners on this application.

Recommended changes to conditions

I recommend the following changes are made to the proposed conditions to ensure that the investigations and remedial approaches meet the expectations of WDC under the consent, and ensure contaminated soil can that is retained on site can be appropriately managed in future.

NESCS.3 – investigations of HAIL sites to be provided to WDC for approval prior to earthworks commencing.

NESCSX(1) – this condition should specify that WDC should approve any remediation action plans that are provided.

NESCS.5 – the works completion report should also include the fate of contaminated soil disposed/reused within the site in the records

I recommend the addition of the following to the conditions:

- A contamination discovery condition (e.g. *“In the event of contamination discovery e.g., visible staining, odours, and/or other conditions that indicate soil contamination, then work must cease until a Suitably Qualified and Experienced Practitioner (SQEP) has assessed the matter and advised of the appropriate remediation and/or disposal options for these soils. Any measures to manage the risk from potential soil contamination must be approved by the Waimakariri District Council.”*)
- Notification of the commencement of earthworks 5 days prior to their commencement on a contaminated site. This will allow compliance checks to occur if required.
- A condition requiring provision of a long term site management plan (LTSMP) as there may be contamination retained on site (asbestos is the main contaminant they are proposing to retain above the commercial/industrial soil contaminant standard). This will have some overlap with the works completion report, but it would be valuable to have a document which addresses NESCS requirements for any future earthworks in the areas where contamination exceeds SCS E.g. *“Where any contamination above applicable soil contaminant standards will be retained or managed on site, a Long Term Site Management Plan shall be submitted to [relevant council], Attention: [relevant council team] within two months of completing the construction works. The Long Term Site Management Plan shall include:*
 - a. *Confirmation that the construction works have been completed and were carried out in accordance with the SMP*
 - b. *Details of any soil sampling and validation carried out*
 - c. *Accurate details of the location and extent of any encapsulated soils, including an estimate of the volume of material discharged; and*
 - d. *Details of the future management of any encapsulated soils, including how the integrity of the lining or seal will be maintained and monitored over time”*