

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA ROHE**

ENV-2023-WLG-000005

UNDER the Resource Management Act 1991

IN THE MATTER the direct referral of applications for resource consents and notices of requirement under sections 87G and 198E of the Act for the Ōtaki to North of Levin Project


BY **WAKA KOTAHĪ NEW ZEALAND TRANSPORT AGENCY**

Applicant

**STATEMENT OF EVIDENCE OF SARAH HELEN NEWALL ON BEHALF OF THE
MANAWATŪ-WHANGANUI REGIONAL COUNCIL, THE GREATER WELLINGTON
REGIONAL COUNCIL, HOROWHENUA DISTRICT COUNCIL AND KĀPITI COAST
DISTRICT COUNCIL**

SITE CONTAMINATION

Dated: 26 September 2023


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STATEMENT OF EVIDENCE OF SARAH HELEN NEWALL

A. INTRODUCTION

[1] My name is Sarah Helen Newall. I am a Site Contamination Specialist with HAIL Environmental Limited. I have been in that position since February 2021.

[2] I prepared a combined report on the application required by sections 87F and 198D of the Resource Management Act 1991 on behalf of Manawatū-Whanganui Regional Council (**Horizons**), the Greater Wellington Regional Council (**GWRC**), the Horowhenua District Council and the Kāpiti Coast District Council (**District Councils**) dated 28 April 2023 (**combined s87F and 198D Report**).

[3] In my combined s87F and 198D Report, I reviewed the application from Waka Kotahi for resource consent applications lodged with Horizons and the GWRC and notices of requirement (**NoRs**) lodged with the District Councils relating to the Ōtaki to North of Levin Highway Project (the **Ō2NL Project** or **Project**). My combined s87F and 198D Report provided recommendations to improve or further clarify aspects of the resource consent application addressing site contamination.

[4] I confirm I have the qualifications and experience set out at paragraphs 4-10 of my combined s87F and s198D Report.

[5] Since filing my combined s87F and 198D Report I have reviewed the Contaminated Land evidence of Waka Kotahi prepared by Kathryn Halder dated 4 July 2023. I have not attended any expert conferencing and to the best of my knowledge, no issues of site contamination were discussed at mediation.

B. CODE OF CONDUCT

[6] I repeat the confirmation provided in my combined s87F and 198D Report that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This

evidence has been prepared in accordance with that Code. Statements expressed in this evidence are within my area of expertise.

C. OUTSTANDING ISSUES

[7] There are no outstanding issues arising from my combined s87F and 198D Report.

[8] All issues relating to site contamination have been resolved by Waka Kotahi confirming that the resource consents for contaminated land have not been applied for as part of the proposal before the Court.

[9] Waka Kotahi has confirmed that the necessary contaminated land related consents will be applied for separately in due course. For reasons set out in my combined s87F and s198D Report I consider this to be appropriate.

[10] I am available to answer any questions from the Court arising from my combined s87F and s198D Report. If the Court does not require my appearance at the hearing, I can confirm the contents of this statement of evidence by affidavit.

26 September 2023

Sarah Helen Newall