

**BEFORE THE WAIMAKARIRI DISTRICT
COUNCIL HEARINGS PANEL**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of a submission by Miranda
Hales (V1 Submission 55; PDP Submission 246)

BRIEF OF EVIDENCE OF HOLLIE GRIFFITH

Date 5 March 2024

QUALIFICATIONS AND EXPERIENCE

1. My name is Hollie Griffith. I have 8 years' experience as an Environmental Scientist.
2. I am working for Momentum Environmental Ltd. I have worked for Momentum Environmental Ltd for 4 years. Prior to this I worked at Beca for 3 years.
3. My relevant professional experience includes undertaking soil contamination investigations and preparing investigation reports for multiple similar sites across wider Canterbury in accordance with the Ministry for the Environment's Contaminated Land Management Guidelines.
4. I confirm that I have prepared this evidence in accordance with the Code of Conduct for Expert Witnesses. Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. The issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying on the evidence or advice of another person. The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

EVIDENCE

5. I have prepared the attached report (**Appendix A**) dated 21 July 2023.
6. In summary the report states a Preliminary Site Investigation (PSI) was prepared to support future higher density residential development. The PSI showed that the site (126 Lehman's Road, Rangiora) has been used for pastoral farming activities for its known history until becoming a rural residential lifestyle lot in the early 1990's. The normal use of fertilisers and pastoral weed controls associated with this use is unlikely to have caused soil contamination that would pose a risk to human health.

A dwelling, garage and shed were constructed at the site in the early 1990's therefore the risk of soil contamination from lead-based paint products and asbestos containing materials is very low. A burn area is visible in the latest aerial photograph. The site inspection and XRF screening confirmed the burn area has been used for green waste

only and therefore does not constitute an intentional or accidental release of hazardous substances in sufficient quantity to pose a risk to human health.

7. The report recommends that as no evidence of any activities or industries as listed in the Hazardous Activities and Industries List (HAIL) have occurred on the site, now or in the past, the site is considered suitable for its proposed future use with no further investigations required.

In terms of planning status, at the time of writing of the report, the NESCS does not apply to the site, therefore resource consent under the NESCS is not required.