

**BEFORE AN INDEPENDENT HEARING PANEL
APPOINTED BY QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER THE Resource Management Act 1991

IN THE MATTER of a Variation to the proposed Queenstown Lakes District Plan (Te Pūtahi Ladies Mile) in accordance with Part 5 of Schedule 1 to the Resource Management Act 1991

**STATEMENT OF EVIDENCE OF RICHARD REGAN
ON BEHALF OF THE ANNA HUTCHINSON FAMILY TRUST**

DATED: 20 OCTOBER 2023

Counsel acting:
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MAY IT PLEASE THE HEARING PANEL

1. My full name is Richard Regan. I am a Principal Engineer at McKenzie and Co.

Qualifications and experience

2. I am a Chartered Civil Engineer with over 30 years' experience in urban development, construction supervision and project management in the public and private sector. My experience includes civil consultancy roles in the UK, Australia, and New Zealand.
3. Recent works included Engineer to Contract for watermain rehabilitation at the Auckland Airport (Domestic Terminal), Design Manager for residential/industrial/commercial developments and NZ Technical Lead for the Stormwater Technical Working Group - New Zealand Government Three Waters Amalgamation (Stormwater Code of Practice).
4. I am a named contributor to Auckland Council Erosion and Sediment Control Guidelines GD05 and an Auckland Council Registered Producer Statement Author.
5. My recent professional roles include:
 - (a) Harrison Grierson, Auckland, Technical Director;
 - (b) DHC, Engineering Manager; and
 - (c) Calibre, Urban Business Unit Leader (Northern).
6. My academic and professional qualifications and memberships are as follows:
 - (a) Bachelor of Civil Engineering, Auckland University 1994
 - (b) NZCE Certificate in Civil Engineering 1991
 - (c) Member of Institution of Professional Engineers NZ
 - (d) Chartered Professional Engineer, (CPEng)

- (e) International Professional Engineer (IntPE); and
- (f) Auckland Council Producer Statement Author Building Code clauses covered (B1, B2, E1, G13).

I have recent and relevant experience in investigation and reporting stormwater serviceability on a proposed development submission for the Auckland Council Future Development Strategy in Riverhead, Auckland. I have also advised on residential development projects within Auckland region and the North Island – Taranga and Waharoa, as well as a significant residential development in Silverstream , Wellington. Refer to attached CV for further details.

Code of Conduct

7. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

Scope of evidence/matters to be addressed

8. I have prepared evidence in relation to Civil Engineering (Three Waters focusing on wastewater and Drinking Water) in support of the submission memorandum of the Anna Hutchinson Family Trust (**Trust**), a submitter on the Te Pūtahi Ladies Mile Variation (**Variation**). My evidence includes:

- (a) a desk top review of available information
 - (i) WSP Ladies Mile 3 Waters Servicing Concept -Final Report 6 – XQ118.10;
 - (ii) Queenstown Lakes District Council GIS Platform; and
 - (iii) The Property Group Response Letter – Response to Comments Received for Glenpanel Development Limited in relation to the Flint's Park, Ladies Mile—Te

Pūtahi resource consent application under COVID-19
Recovery (Fasttrack Consenting) Act 2020.

- (b) description of the work/analysis undertaken based on a desktop review; and
- (c) my conclusion is based on a desktop review of the aforementioned data sources.

9. I have concluded that the area which is the subject of the Trust's submission has potential serviceability for wastewater, water supply and stormwater, and there is no reason to decline the Trust's relief based on any of these matters.

The key matters in question or in dispute

10. The key matters in question relating to my expertise are:

- (a) whether servicing the site with wastewater and drinking water is viable for this site;
- (b) the coordinated and appropriately designed and located infrastructure consistent with Council standards, including the provision of a contribution to the upgrade of existing infrastructure to accommodate future development where appropriate; and
- (c) whether appropriate infrastructure can be supplied at the subdivision and development stage.

11. I have prepared the following analysis based on a desk top review of three waters information and existing contours.

Issues raised by the Variation relevant to my expertise

- 12.** Based on my review of the information identified, I consider that the provision of both a wastewater and drinking water solution is viable for this site, based on the level of development envisaged by the Trust's submission.
- 13.** I consider that decisions about the exact design of the wastewater and drinking water proposals should be deferred to Detailed Design, and that feasible solutions will be readily able to be identified and designed at that stage.
- 14.** As noted in the evidence by Ms. Prestidge, "there are feasible options available to service Ladies Mile as a whole". I consider this statement to be true, and can apply equally to include the Extension Area.

My conclusions and recommendations

- 15.** I have concluded that the Minister's Statement of Expectations regarding stormwater have been addressed.
- 16.** The Council section 42A report confirms that stormwater must be addressed by developers, and it is my view that there is no technical reason why a stormwater management system should prevent rezoning for urban purposes.
- 17.** I also agree and accept that a stormwater management system can be developed which will not impact the Shotover River.
- 18.** The land which is identified in the submission by the Trust has potential serviceability for wastewater, water supply and stormwater, and these are factors that should not prevent consideration of the Extension Area for rezoning as sought by the Trust.

DATED this 20th day of October 2023

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Richard John Regan