

**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 CALLUM WOOD
ON BEHALF OF THE ANNA HUTCHINSON FAMILY TRUST**

DATED: 15 November 2023

Counsel acting:

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MAY IT PLEASE THE HEARING PANEL

1. My full name is Callum Kenneth Wood. I am a Principal Civil Engineer practising with Cosgroves Limited in Christchurch. Cosgroves is a multi-discipline engineering consulting company that provides solutions for civil engineering and building engineering services for public and private clients.

Qualifications and experience

2. I am a Chartered Civil Engineer with over 30 years' experience working on projects all over New Zealand and overseas.
3. Recent works include Design Lead for civil works on Te Pa Tahuna (Superlot 1) residential development in Gorge Road, Queenstown; 3 waters and civil design for Northlake Aged Care facility in Wanaka, and Civil infrastructure design for Flints Park, Ladies Mile.
4. My academic and professional qualifications and memberships are as follows:
 - (a) Bachelor of Civil Engineering, Canterbury University 1989;
 - (b) Chartered Professional Engineer, (CPEng);
 - (c) Member of Engineering NZ; and
 - (d) Chartered Director, (IOD)

Code of Conduct

5. 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

6. This evidence relates to Civil Engineering, infrastructure matters, 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**). I note that Mr Ladbrook has addressed stormwater matters.

7. I also note that:
 - (a) I prepared evidence on behalf of Glenpanel Development Limited (**Glenpanel**), which essentially attached my reports prepared in respect of the Glenpanel Fast Track Application; and

 - (b) I prepared a memorandum commenting on the Infrastructure Joint Witness Statement, as I was not able to attend that conferencing.

8. My evidence for the Trust has been based on and/ or has taken into account:
 - (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.

(iv) WSP Ladies Mile HIF Scoping and Concept Design report for QLDC, June 2018

(b) a description of the work/analysis undertaken based on a desktop review; and

(c) a desktop review of the aforementioned data sources.

9. I have read the evidence of Mr Regan, who had provided evidence for AHFT on these matters, but understand that it is to be withdrawn. Accordingly, I have treated that evidence as for background only, and I place no reliance on it, other than adopting a similar framework for my evidence (to best assist the Panel in terms of considering the substantive content of a replacement brief of evidence), in terms of forming my professional, independent, opinion on the issues within my expertise and scope of instruction.

10. In my opinion, the area which is the subject of the Trust's submission has potential serviceability for wastewater, and water supply, 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

11. I consider that 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.

12. 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

13. Based on my review of the information identified, I consider that it is entirely possible to provide both wastewater and drinking water options to service the site, based on the level of development envisaged by the Trust's submission.

14. In my opinion, decisions about the exact design of the wastewater and drinking water proposals can, and should, be deferred to Detailed Design, and that feasible solutions will easily be able to be advanced at that stage. It is preferable, in my opinion, to leave the detail to this stage, as that is when the latest information will be available to inform the most appropriate design solutions at that stage.

15. I note that the QLDC HIF report discusses the Wastewater capacity of the existing sewer lines at the location of the Shotover bridge as having spare capacity and no issues with the intent of sewer being directed via that route. However, the new 2023 reports by WSP that update the 3 waters infrastructure plan for Ladies Mile now state new lines and connections across the bridge to the Shotover Waste Water Treatment plant (WWTP). These new lines and connections are all pragmatic solutions for the completeness of the entire Mile, but I do note there is capacity now for connection into exiting lines without doing major upgrades that can be handled by careful planning and staging for some parts of the Mile. For example, the means to pump offline at low volume periods if required. All of these are engineering details that can be handled as conditions of future consent applications.

- 16.** I also consider that the details of how the proposed development to be enabled by the submission in terms of how it could store, connect and be reticulated via gravity or pumping for sewer can be engineered in design phases.
- 17.** The various QLDC reports also discuss the water supply options for upgrades to service Ladies Mile in general. There is an existing supply at the Shotover bridge and upgrades to lines up through Stalkers Road, along with intended new water reservoirs on the hillside of Ladies Mile. All of these options present viable means to service the proposed development.
- 18.** Ms. Prestidge records her opinion that “there are feasible options available to service Ladies Mile as a whole”. I agree, and consider this also applies in respect of the Extension Area.
- 19.** I have discussed with Amy Prestidge the broad summary described above and we are both in agreement that the engineering solutions described in various reports cover what is required for the Mile and that there are ways to stage and manage the developments as required.

JWS Infrastructure/ Stormwater

- 20.** As noted above, I have read the JWS, and generally agree with it as it relates to the AHFT submission, being that:
- (a) Amy Prestidge & Richard Regan - agree that connections to the existing networks for water supply and wastewater solutions are technically feasible, subject to consultation and acceptance by QLDC.
 - (b) Amy Prestidge – notes that there is finite spare capacity within both the existing wastewater and water supply networks which may impact the sequencing of development.

21. The need for any development to “wait its turn”, or an upgrade, in respect of wastewater and water supply infrastructure is a common occurrence. The risk of this should not, however, in my opinion, be an impediment to rezoning land. Solutions can be found, and the rezoning can provide a significant incentive for the landowner/ developer to be part of the solution.

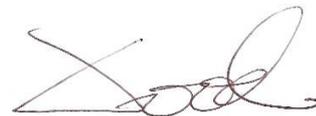
My conclusions and recommendations

22. In my opinion, the Minister’s Statement of Expectations regarding water supply and wastewater have been addressed, particularly that the Variation:

- (a) ensures appropriate and feasible infrastructure is provided for in Te Pūtahi Ladies Mile Zone; and
- (b) ensures future development will be undertaken in a manner that recognises and protects sensitive receiving environments including in particular ... the Shotover River.

23. The land which is identified in the submission by the Trust has potential serviceability for wastewater, and water supply, and, in my opinion, these are factors that should not prevent consideration of the Extension Area for rezoning as sought by the Trust.

DATED this 15th day of November 2023



Callum Kenneth Wood