

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Private Plan Change 2 to
the Hamilton City Operative District
Plan: Te Awa Lakes Private Plan
Change

**STATEMENT OF EVIDENCE OF KORI LENTFER AND DAVID MORTON FOR THE APPLICANT
IN RESPONSE TO QUESTIONS FROM THE PANEL**

(GEOTECHNICAL)

28 NOVEMBER 2019

1. INTRODUCTION

- 1.1 Our full names are Kori Alfred Warren Lentfer and David John Morton.
- 1.2 Kori has the qualifications and experience set out in paragraphs 2.2 to 2.6 of his separate statement of evidence on geotechnical issues, and confirms the same statement he has made in previous statements regarding the Code of Conduct. Kori has 10 years of site specific experience working on the Te Awa Lakes site.
- 1.3 David is a Principal Geotechnical Engineer with CMW Geosciences and holds the qualifications of BSc and MSc (Technology) (Hons) from the University of Waikato in New Zealand, MEngSc (Geotechnical) from the University of New South Wales in Sydney, he is a Chartered Professional Engineer (CPEng) in New Zealand and has 23 years of professional experience. David has 20 years of site specific experience working on the Te Awa Lakes site, and also attended the expert witness caucusing for geotechnical matters with Mr Lentfer.
- 1.4 David confirms that he has read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and to the extent that he is giving expert evidence, has complied with it in preparing this evidence. He confirms that the issues addressed in this evidence are within his area of expertise and he has not omitted to consider material facts known to him that might alter or detract from the opinions expressed in his evidence.

2. TIMING OF FURTHER INVESTIGATION

- 2.1 We have been advised that a question was asked by Cmr Watson on the first day of the hearing as to why full geotechnical investigation and assessment could not be undertaken now, at the plan change stage, rather than as proposed as a later part of the land development consent process.
- 2.2 A staged geotechnical investigation and design approach is typical and appropriate for this type of large scale land development project. Only preliminary earthworks design has been undertaken to date that is sufficient to enable geotechnical analysis and design to confirm feasibility of the proposed development. Extensive civil and geotechnical engineering design work is required to support a resource consent application involving confirming the design finished ground surface. If required, further targeted geotechnical

site investigation to inform detailed geotechnical design of the proposed landform and structures (e.g. bridges, culverts, ground improvement etc.) would then follow and feed into iterations of the civil design until a final development design is confirmed. This may then be followed by further design refinement at the engineering plan approval phase prior to issue of design drawings and documents for construction.

- 2.3 The further stages of work would only be done once it is confirmed that the land has a Residential or Business zoning with specific end uses in mind under those zonings. There is a significant investment of time and cost in progressing a design from preliminary / feasibility assessment, through the detailed design to construction stages. For a development of this scale and nature, there needs to be careful consideration of all design elements (geotechnical being one of these) and a two (or more) stage approach is required to allow design iterations to be tested and modified to meet all performance criteria.

Kori Lentfer & David Morton

28 November 2019