

Before the Expert Panel appointed under the
Fast-track Approvals Act 2024

FTAA-2604-1207

Under the Fast-track Approvals Act 2024 (FTAA)

In the matter of the Southern Link Inland Port

By Southern Link Property Limited

**STATEMENT OF EVIDENCE BY ANDREW CRAIG ON BEHALF OF SOUTHERN LINK
PROPERTY LIMITED**

STORMWATER

19 August 2026



Sarah Scott / Kierra Parker
sarah.scott@simpsongrierson.com
kierra.parker@simpsongrierson.com
PO Box 874 Christchurch

1. INTRODUCTION

1.1 My full name is Andrew Robert Craig. My qualifications and experience, and my role in the Southern Link Inland Port Project (**SLIP**) are set out in the “Stormwater Assessment” report dated 15 April 2026, Section 1.2, which is included in Part B.13 of the substantive application for the SLIP.

1.2 I have been asked by Southern Link Property Limited (**SLPL**) to provide a response to specific matters within my areas of expertise contained in written comments on the SLPL application from persons invited by the Panel to comment under s 53 of the FTAA. The topics I cover are:

- (a) Natural hazards (stormwater) comments from Ms Amanda Ling of Beca on behalf of Otago Regional Council (**ORC**);
- (b) Natural hazards (hydrology and flooding) comments from Mr Ben Throssell of Beca on behalf of Dunedin City Council (**DCC**);
- (c) Comments on flooding from Mosgiel Taieri Community Board;
- (d) Comments on flooding from Jane and Bernie McLeod (231 Dukes Rd North); and
- (e) Comments on flooding from Craig and Joanne Inch (54 Rutherford Road).

Code of Conduct

1.3 I confirm that I have read the Code of Conduct for Expert Witnesses contained in section 9 of the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

**2. MS AMANDA LING ON NATURAL HAZARDS (STORMWATER), APPENDIX 2
TO THE COMMENT OF OTAGO REGIONAL COUNCIL**

2.1 Ms Ling states in summary at Section 3 that “Overall, the proposed on-site stormwater management system demonstrates the effects from the development can be effectively managed, as proposed in the application material, or otherwise addressed through the proposed conditions of consent.”

2.2 In Section 4, Ms Ling requests some additions to the proposed conditions B.8 and B.18, referencing Suitably Qualified and Experienced Person(s)(SQEP) and requesting some additional specific information. Whilst this information would have already been made available by a SQEP in the design report required under B.8 as proposed by the Applicant, the additional wording serves to provide some additional clarity, and I consider this request reasonable.

2.3 In Section 4, Ms Ling requests that condition B.21 be extended to include “appropriate freeboard above the 1% AEP flood level in accordance with the Dunedin City Council 2021 Update to Methodology for Determining Minimum Floor Levels”. The referenced DCC methodology focusses primarily on residential dwellings and does not provide an appropriate risk-based approach for commercial or industrial facilities that considers operational requirements, building type flood resistance, flood tolerance or criticality (impact and recoverability). In my opinion, referring to this document is not warranted, and a risk-based approach to finished floor levels should be managed during both detailed design and the subsequent building consent process.

3. MR BEN THROSSELL ON NATURAL HAZARDS (HYDROLOGY AND FLOODING), APPENDIX 4 AND PARAGRAPHS 145-163 OF THE COMMENT OF DUNEDIN CITY COUNCIL

3.1 Mr Throssell states at his conclusion that the on-site hazard risk can be mitigated and reduced to a suitably low threshold via consent conditions (minimum floor levels) and the mitigation works as proposed by the applicant. He makes some suggestions regarding further information required on effects on flooding and the potential off-site risks which I respond to below.

Setback

3.2 Mr Throssell refers to the setback from waterbodies standards in Rule 11.4.2.7 (summarised at paragraphs 155 and 159 of the DCC comment). He states in his report that:

“while setback standards are not met, the applicant has provided a site-specific, qualified measures to mitigate the flood risk. The 11.4.2.7 assessment intent can be met with conditions to certify outlet/bank protection design, require maintenance of erosion protection and tie discharge throttling to pre-development flows under current and future rainfall intensities.”

3.3 In my opinion, setback standards can be useful mechanisms on small streams but are often overly simplistic and lack appropriate definition for application to larger streams and floodplains. This is because measuring the setback can be ambiguous and the effects that the setback is seeking to manage (notably flood effects) is usually assessed by detailed hydraulic modelling and design responses to quantify and manage effects. Nevertheless, Mr Throssell and DCC have considered that a SQEP can demonstrate flood risk is avoided or the effects no more than low and have not recommended a new proposed condition in this regard. I support that approach.

Flood hazard performance outcomes

- 3.4** Mr Throssell proposed in an email attached to the DCC comments (summarised at [163] of the DCC comment) an alternative to SLPL's condition B.21 which deals with detailed design plan and hydraulic performance requirements and is included in SLPL's ORC condition set for managing flood effects.
- 3.5** I consider that the 20mm and 10mm performance outcome suggested by Mr Throssell outside of existing buildings is unnecessarily restrictive without reasonable consideration for hydraulic model stability or existing land-use. In response to the thresholds proposed by Mr Throssell, my view is that condition B.21 could contain a revised threshold of 20mm for existing commercial and rural buildings to provide appropriate and achievable controls on potential flooding effects in this environment. I do not agree that it is appropriate to require 20mm or 10mm outside of buildings, due to the possibility for changes between 10-100mm in localised depressions on rural land, even with a relatively stable hydraulic model.
- 3.6** My opinion on this matter has been developed having carefully considered the hydraulic modelling of the site and surrounding area, as set out in Appendix C and C2 of the Stormwater Assessment report, in addition to consideration of existing consented land-use in areas that might potentially be impacted by small changes in apparent modelled flood effects. I have also had personal experience in modelling large areas of potential hydraulic effects for the Ōtaki to North of Levin 24km highway, where I worked with council reviewers to develop an effects management framework that is more similar to the proposed conditions than the alternative proposed by Mr Throssell.
- 3.7** Mr Throssell recommends further evidence be requested including on modelling of additional flood events, for example the use of the 0.2% AEP event with and without climate change (summarised at [159] DCC comment). In my opinion such a rare event is useful for considering over-

design event risk and emergency management procedures but is neither appropriate nor has precedent for assessing potential effects on the existing environment in this instance. I note that this suggestion has not propagated through to a proposed condition in the DCC proposed condition set, which I support.

- 3.8** Mr Throssell suggests that other further information is required to demonstrate hydraulic neutrality off-site including additional reporting locations and additional granularity on effects (set out in his conclusion and summarised at [157] DCC Comment). In my view this type of information is more appropriately provided as part of detailed design when demonstrating compliance with condition B.21. This will allow the evidence to be supported by more detailed modelling with the final design, rather than attempting to provide excessive precision at the current stage of concept design.

Finished Floor Levels and Freeboard

- 3.9** I agree with the statement by Mr Throssell that floor levels are generally set at building consent stage (summarised in DCC Comment at [158]). I do not agree with the suggested basis for setting floor levels and freeboard ahead of detailed design. There are detailed modelling and consideration of other operational and building design resilience measures that make this matter more appropriate to deal with at the time building consent is sought for a specific building. I note that this suggestion has not propagated through to a proposed condition in the DCC condition set, which I support.

Erosion/scour control at outlets

- 3.10** Mr Throssell references the importance of outlets and spillways to incorporate energy dissipation and erosion/scour protection and maintenance of these measures (summarised in DCC Comments at [159]). I agree and expect that maintenance requirements of these measures would typically be included in asset operations and maintenance requirements,

which are covered by proposed conditions B.16- B.20. I do not consider that there needs to be an additional specific consent condition to require this. I note that this suggestion has not propagated through to a new proposed condition, which I support.

4. MOSGIEL TAIERI COMMUNITY BOARD (MTCB)

4.1 The MTCB seeks assurance that stormwater infrastructure will be planned, funded and delivered before the development reaches full scale. SLPL has confirmed that the design and construction of the main transverse drainage features, notably the eastern and western swales and stormwater attenuation pond will be delivered at the start of construction as they will aid in the effective control of runoff and sediment control.

4.2 The MTCB express concern relating to possible flood risks on Mosgiel, requesting ORC oversight on any changes to flood risk that might arise from the proposal. The Stormwater Assessment report illustrates that no adverse flood impacts of this nature are anticipated. Potential for flood impacts will be adequately controlled via the proposed consent condition B.21. Therefore, in my opinion, the flood related concerns of MTCB are in my view appropriately addressed.

5. JANE AND BERNIE MCLEOD (231 DUKES RD NORTH)

5.1 The McLeods raise concerns over flooding risk to the Silver Stream, Mosgiel and neighbours, citing the Future Development Strategy (**FDS**), the Natural Hazards on the Taieri Plains report of 2013, and total rainfall volumes from recent events.

5.2 The modelling employed by me for assessing flood risk before and after the proposed SLIP development is based on industry standard available rainfall analysis and hydraulic modelling appropriate to the stage of consent design, as set out in the Stormwater Assessment report which has been reviewed

by ORC, and which is more current and accurate than the analysis used in the Taieri Plains 2013 report.

5.3 The comparison of pond volume by the McLeods using total rainfall does not account for flow that continues to leave the pond at a controlled pre-development rate while it is raining. Thus, it is mainly the increase in runoff, relative to the existing condition, that is held in the pond for gradual release. This concept has been considered explicitly in the hydraulic modelling referred to in the Stormwater Assessment.

5.4 The Stormwater Assessment report illustrates that no adverse flood impacts are anticipated. Potential for flood impacts will be adequately controlled via condition B.21. Therefore, in my opinion, the flooding related concerns raised are appropriately addressed.

6. CRAIG AND JOANNE INCH (54 RUTHERFORD ROAD)

6.1 The Inch's raise concerns over flooding risk to the Silver Stream and to Mosgiel, citing total rainfall volumes from recent events.

6.2 The modelling employed by me for assessing flood risk before and after the proposed SLIP development is based on industry standard available rainfall analysis and hydraulic modelling appropriate to the stage of consent design, as set out in the Stormwater Assessment report which has been reviewed by ORC.

6.3 The comparison of pond volume by the Inches using total rainfall does not account for flow that continues to leave the pond at a controlled pre-development rate while it is raining. Thus, it is mainly the increase in runoff, relative to the existing condition, that is held in the pond for gradual release. This concept has been considered explicitly in the hydraulic modelling referred to in the Stormwater Assessment.

6.4 The Stormwater Assessment report illustrates that no adverse flood impacts are anticipated. Potential for flood impacts will be adequately controlled via condition B.21. Therefore, in my opinion, the flooding related concerns raised are appropriately addressed.

7. CONCLUSION

7.1 The S53 comments do not change my views expressed in the Stormwater Assessment Report. Importantly, I consider that potential flood effects can be appropriately controlled through proposed condition B.21 with the revised threshold of 20mm for existing commercial and rural buildings as described in paragraph 3.5 above. I do not consider any further changes to the applicant's condition set are required.

Dated: 19 August 2026



Andrew Craig