
**APPLICATION BY SOUTHERN LINK PROPERTY LIMITED FOR THE SOUTHERN LINK
INLAND PORT**

**SUMMARY STATEMENT OF TZE-MAN AMANDA LING ON BEHALF OF OTAGO
REGIONAL COUNCIL**

11 September 2026

1. INTRODUCTION

- 1.1 My full name is Tze-Man Amanda Ling.
- 1.2 I am employed by Morphum Environmental as a Senior Engineer, based in Auckland.
- 1.3 I have read the Code of Conduct for Expert Witnesses in giving evidence to the Environment Court. I agree to comply with that code when giving evidence to the Hearing Panel in this matter. All my evidence is within my expertise, and I have considered and stated all material facts known to me which might alter or qualify the opinions I express.

2. SCOPE OF STATEMENT

- 2.1 From June 2025 I was engaged by Otago Regional Council ("ORC") to provide pre-application advice of the technical reports/assessment related to natural hazards (flood hazard zone) and engineering (ORC flood scheme located nearby) perspective that would need to be provided for the consent application.
- 2.2 I have visited the development site on 14th August 2025 to understand the site layout and surrounding environment.
- 2.3 In February 2026 I was engaged by ORC to undertake a technical review and provide feedback on the flood hazard management proposal in pre-application documents provided by Southern Link Property Limited for the Southern Link Inland Port.
- 2.4 In June 2026 I was engaged by ORC to undertake a technical review of the flood hazard management proposal of the submitted substantive application documents provided by Southern Link Property Limited for the Southern Link Inland Port.
- 2.5 In preparing this evidence I have reviewed the following documents
 - (a) Southern Link Inland Port Stormwater Assessment Report, Project: 310206525, prepared by Stantec New Zealand, dated 15 April 2026.

- (b) The plan set: Southern Link Inland Port Developed Consent Design, plans prepared by Stantec New Zealand, revision D, dated 15 April 2026.
- (c) The draft conditions, sourced from: https://www.fasttrack.govt.nz/__data/assets/pdf_file/0020/29333/Part-C.02-Updated-Proposed-Conditions-Otago-Regional-Council-Tracked-Change-Version.pdf. Accessed 20 July 2026.

2.6 Subsequently I have also reviewed:

- (a) Statement of Evidence prepared by Andrew Craig on behalf of Southern Link Property Limited for Stormwater, dated 19 August 2026.
- (b) The updated draft conditions, sourced from: https://www.fasttrack.govt.nz/__data/assets/pdf_file/0017/33281/Attachment-23-Updated-proposed-Otago-Regional-Council-conditions.pdf. Accessed 28 August 2026.
- (c) Summary Statement on Stormwater Assessment prepared by Andrew Craig for Southern Link Property Limited, dated 10 September 2026.

2.7 I provided a review of this subsequent material in an e-mail to the processing planner for ORC, Hannah Goslin, on 28 August 2026.

2.8 I also confirm I participated in a discussion with the applicant's stormwater specialist (Mr. Andrew Craig) on 9 September 2026.

3. SPECIALIST ASSESSMENT

3.1 I provided a memorandum titled S53 Specialist Response – Substantive Application, dated 27 July 2026, upon review of the application material from a natural hazards (flooding) perspective.

3.2 The assessment considered the provided application material sufficient to understand the site context, the proposed works, the potential effects (as they relate to flooding) and the measures proposed to address the potential effects.

3.3 It is understood further refinement of the 1% Annual Exceedance Probability ("AEP") flood model during detailed design is anticipated considering the final building and operational layouts. The finished floor levels for the proposed onsite development buildings will be confirmed at detailed design stage.

- 3.4 Overall, I considered that the potential effects, as they relate to flood hazard, could be appropriately managed, largely as proposed in the application material, including through those conditions of consent recommended by the applicant.

4. COMMENTS ON PROPOSED CONDITIONS

- 4.1 In my S53 memorandum dated 27 July 2026, I commented on the proposed conditions B.8, B.18 and B.21.
- 4.2 The proposed Otago Regional Council conditions (28 August 2026 revision) addressed the comments provided for conditions B.8 and B.18.
- 4.3 In response to my recommendation for amendment of the condition B.21, 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 Statement of Evidence from Mr Craig, point 2.3, noted the referenced Dunedin City Council (“DCC”) methodology document primarily focuses on residential dwellings and does not provide an appropriate risk based approach for commercial or industrial facilities. In Mr. Craig’s opinion, reference to the DCC 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.
- 4.4 For the reasons outlined in Mr Craig’s Statement of Evidence, at point 2.3, I considered the removal of the reference to the DCC methodology document from the recommended condition was acceptable in my email back to the ORC processing planner on 28 August 2026. I also proposed a revision to the recommended condition as follows:

An assessment of the proposed building finished floor levels with appropriate freeboard above the 1% AEP with climate change flood level shall be provided by a suitably qualified and experienced person(s) at building consent stage.

- 4.5 Following my discussion with Mr Craig on 9 September 2026 regarding the revised condition, Mr Craig has considered the proposed condition is reasonable in his SLPL Summary Statement on Stormwater Assessment point 4.
- 4.6 I concur the inclusion of the revised condition accommodates a risk-based approach better applicable to commercial or industrial facilities to manage finished floor level design from flood hazard effects.

5. CONCLUSIONS

- 5.1 The assessment provided in my memorandum titled S53 Specialist Response – Substantive Application, dated 27 July 2026 remains applicable, with subsequent

refinement to the condition B.21 relating to the proposed building finished floor levels be provided with appropriate freeboard above the 1% AEP flood level.

- 5.2 I recommend that consent condition B.21 is amended to include the below detail related to the finished floor levels:

An assessment of the proposed building finished floor levels with appropriate freeboard above the 1% AEP with climate change flood level shall be provided by a suitably qualified and experienced person(s) at building consent stage.

- 5.3 Subject to the amendment of consent condition B.21, the remaining concerns relating to potential effects as they relate to flood hazard are resolved.



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Tze-Man Amanda Ling

11 September 2026