

**BEFORE THE HEARINGS PANEL  
FOR THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN**

**IN THE MATTER** of the Resource Management Act  
1991

**AND**

**IN THE MATTER** of the Queenstown Lakes Proposed  
District Plan

**AND**

**IN THE MATTER** of Hearing Submissions Seeking  
Amendments to the Planning Maps  
covering Queenstown and  
Queenstown Rural (Excluding  
Wakatipu Basin)

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**STATEMENT OF EVIDENCE OF PAUL GEORGE FAULKNER  
ON BEHALF OF**

**Middleton Family Trust  
(Submitter 336)**

**Dated 9<sup>th</sup> JUNE 2017**

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## 1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Paul George Faulkner. I am a Senior Engineering Geologist at GeoSolve Limited (“GeoSolve”). I have 19 years of experience in my field and hold the qualifications of B.Sc (Geological Science) and M.Sc (Engineering Geology), from the University of Leeds in the United Kingdom. I am a fellow of the Geological Society, London. I currently work with Geosolve and have been based in the Queenstown region for approximately 11 years. I have worked for Tonkin & Taylor Ltd and Geosolve during this period
- 1.3 I specialise in rock and soil slope stability in terms of associated risk assessments and remediation, geological hazards and undertaking construction on steep slopes and areas with unfavourable ground conditions. I have worked on a wide range of projects including large commercial/private buildings and associated deep excavations, assessments of rock slopes for highways and commercial operations, and high end residential developments.
- 1.4 I have provided emergency response services for rocks fall incidents in the Queenstown Lakes District region and completed risk assessments for unstable ground in high mountain environments.
- 1.5 I have read the Code of Conduct for Expert Witnesses in the Environment Court consolidated Practice Note (2014). I agree to comply with this Code of Conduct. This evidence is within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.6 In the preparation of this evidence I have reviewed the following:

- a. Primary submission #336; and
  - b. The Statement of Evidence of Mr Geddes filed on behalf of Middleton Family Trust as part of Hearing Stream 13; and
  - c. The Council s.42A Report prepared in relation to Hearing Stream 13 with reference only to the Queenstown Heights Overlay Area; and
  - d. Tonkin & Taylor and Geosolve reports submitted for resource consents RM081212 and RM150520; and
- 1.7 I was directly involved in the preparation of the reviewed T&T and Geosolve reporting outlined above.

## **2.0 SCOPE OF EVIDENCE**

2.1 I have prepared evidence where I assess and explain:

- a. Geotechnical Reporting: Tonkin & Taylor and Geosolve reports submitted for resource consents RM081212 and RM150520;

## **3.0 GEOTECHNICAL REPORTING**

3.1 The geotechnical assessment reports have been completed for the Remarkables View sub-division which is located close to the eastern margin of the Queenstown Hill Landslide. The reports do not constitute an assessment of the landslide feature itself, and are more accurately described as an assessment of the area adjacent to and beyond the eastern margin.

3.2 Three reports were completed for the Remarkables View sub-division (T&T reports 880044, 880044.300 and Geosolve report 150639) submitted for RM081212 and RM150520). These reports were completed for the following reasons:

- a. T&T report 880044, dated April 2007 constitutes a geotechnical assessment for Stage 2 of the Remarkables View sub-division. Due to the close proximity of the Queenstown Hill landslide, this report contains a general overview of the landslide, and a more detailed review of its location relative to the sub-division supplemented by test pitting. Results indicated the proposed sub-division was not affected by the landslide however further assessment was recommended in 1 location to assess shallow soil instability, and the landslide margin, following removal of vegetation. This work was completed in 2010 and is summarised in T&T letter report 880044.300 discussed below.
- b. T&T letter report 880044.300, dated 26 November 2010, summarises the further specific assessment completed following the recommendations provided in the T&T 2007 report, discussed above. The investigation was completed on the western boundary of the Remarkables View sub-division specifically to address shallow soil instability in a drainage channel, and also to provide further confirmation the landslide was outside the sub-division area.
- c. Geosolve report 150639, dated 24 September 2015, comprises a specific review undertaken for a revised lot layout for the Remarkables View sub-

division. Site inspection and review of existing data was completed to confirm the new layout was outside the landslide area.

In summary, the reports reviewed confirm the Queenstown Hill Landslide is not present within the Remarkables View Sub-division. A broad summary of the landslide is presented in T&T report 880044, however the reports do not consider the wider landslide area in any detail e.g. southern or western areas, and are specific to the land immediately beyond the eastern margin only.

- 3.3 It is my opinion that findings of these reports are not representative of the entire landslide hazard. The reports specifically address the area immediately east of the landslide area only, not the landslide itself. Prior to any development within the landslide area, or immediate margins, a detailed geotechnical investigation will be required to determine whether (or not) there is ground suitable for residential development.

Paul Faulkner

A handwritten signature in blue ink, appearing to read 'Paul Faulkner', with a stylized flourish at the end.

**9<sup>th</sup> June 2017**

