

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER OF Proposed Plan Change E: Roxburgh Residential
Area to the Palmerston North City Council
District Plan

**STATEMENT OF REPLY EVIDENCE OF MARY WOOD ON BEHALF OF PALMERSTON NORTH
CITY COUNCIL**

STORMWATER AND FLOODING

Dated: 16 May 2025

REPLY EVIDENCE OF MARY WOOD

A. INTRODUCTION

- [1] My full name is Mary Wood.
- [2] I prepared a section 42A report dated 22 April 2025 on behalf of Palmerston North City Council for proposed Plan Change E (**PCE**).
- [3] My experience and qualifications are set out in my s 42A report.
- [4] I repeat the confirmation given in my s42A Report that I have read and will comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023, and that my report has been prepared in compliance with that Code.
- [5] I have reviewed evidence provided by the submitters on PCE. My response below does not respond to every matter raised by submitters, and this should not be taken as acceptance of these matters. I have referenced my Section 42A evidence and that of other Council witnesses.

B. RESPONSE TO SUBMITTERS

- [6] The following items relate to planning evidence provided by **Mr P Thomas** on behalf of **Frances Holdings** as the only expert to have raised stormwater matters.
- [7] **Items 12-17** of Mr Thomas's evidence relates to the capacity of the proposed stormwater outfall improvement. Mr Thomas considers that the scale of the improvement is sufficient such that permeability requirements are not required.
- [8] I consider that maintaining permeability limits as part of redevelopment is consistent with WSD principles required under the Horizons One Plan and is a fundamental tool in reducing the rate and volume of runoff generated in the first instance.
- [9] The capacity of the outfalls will be sized to meet the requirements of the wider catchment as well as the Plan Change area. The Stormwater Servicing Assessment sized the improved outfall capacity considering 10% AEP plus climate change event and to reduce spilling within the wider catchment, and with 30% pervious across residential lots on the Plan Change area as noted in item 28 of my evidence.

- [10] I have not reviewed the recent capacity calculations for the proposed improvements, but I note that larger pipes for servicing a wider catchment area does not necessarily equate to additional 'spare' capacity for the Plan Change area – earlier capacity assessments already allowed for 30% permeability from the Plan Change area and therefore have already been incorporated into the sizing of the outfall.
- [11] Item 16 of Mr Thomas's evidence states that ..."the capacity of the outfalls as now proposed will far exceed the 10% AEP plus climate change...". I am unclear on the technical basis of Mr Thomas's comments in regard to this statement and I do not consider this to be correct. The pipes are sized to meet the requirements of the wider catchment, not only the Plan Change area. The recommended outfall works from the Stormwater Servicing Assessment clearly identify that a *duplicate* network is required (provided as Figure 1 of my evidence) and the capacity assessment undertaken for the Stormwater Servicing Assessment (Table 8) reviewed sizing of proposed upgrades on the basis of a 10% plus CC design event, not anything greater than that.
- [12] The Stormwater Servicing Assessment did not finalise the alignment for the outfall but identified that options could include a duplicate within the existing corridor or install a new pipe along a different corridor. The design is currently being worked through along with Regional Council and this is addressed in a statement from Ms V Demado. The alignment of the outfall does not impact the need for permeability limits to be retained.
- [13] **Item 19** notes an inconsistency in the Section 42A report with regard to the peak flows from changing land use. I agree that the change in land use is not expected to increase peak runoff. The main issues, however, remain the current capacity of the outfall as well as the need to allow for future climate change with proposed upgrades and the need to implement WSD.
- [14] **Item 22** of Mr Thomas's evidence asserts that stormwater matters would be best addressed at the subdivision stage. I consider that the requirements that would typically be included in a stormwater management plan are addressed through the Plan Change provisions as noted in item 117 of my evidence. I do not agree with the proposed approach of deferring these matters to be considered at a later process stage as these aspects are best incorporated into the early design/layout. Considering

permeability requirements later may be more challenging to accommodate if not planned for in an integrated manner.

[15] Mr Thomas notes that he has been advised that soakage may be feasible for the plan change area, along with retention (**Item 23** of his evidence). I have not seen evidence demonstrating the feasibility of these methods. Regardless, these methods relate to the management of stormwater once it has already been generated – permeability allows for reduction of runoff in the first place.

[16] Overall, I do not agree with Mr Thomas’s requested amendments discussed across items 1-30 in his evidence. The permeability limits in particular are aligned with the Horizon’s One Plan and enable an integrated approach to reducing runoff from the site and the sizing of downstream infrastructure.

16 May 2025



Mary Wood