

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Palmerston North City Council District Plan – Proposed Plan Change E: Rezoning Roxburgh Crescent.

STATEMENT OF EVIDENCE OF ARUNA BANDARA WICKRAMASINGHE MUDIYANSELAGE

Dated 08 May 2025

INTRODUCTION

1. My full name is Aruna Bandara Wickramasinghe Mudiyansele (Aruna Wickramasinghe). My evidence is provided on behalf of the Horizons Regional Council¹ (submitter) in relation to the Proposed Plan Change E. In particular, I will address the planning matters relating to rezoning land and the need to manage stormwater within the District Plan.

Qualifications and experience

2. I am currently employed as a Senior Policy Planner at the Horizons Regional Council (Horizons). I have been working for Horizons since October 2024.
3. I hold a Master of Engineering in Urban Engineering from the University of Tokyo, Japan, and I am a Full Member of Planning Institute Australia (PIA).
4. I have over 10 years of professional planning experience, including two years of policy planning experience in New Zealand. Prior to joining Horizons in October 2024, I worked at the Gisborne District Council as an Intermediate Policy Planner.

My role

5. I prepared Horizons' submission on the Proposed Plan Change E (PC E), dated 19 November 2024, and the further submission dated 19 December 2024.
6. I have also been involved in the pre-hearing meeting on 12 February 2025, with the representatives of the Palmerston North City Council (PNCC) and Ms. Leana Shirley, Senior Policy Planner (contractor) at Horizons.

¹ Manawatu-Whanganui Regional Council

7. I did not attend the second pre-hearing meeting on 28 March 2025. Ms. Shirley represented Horizons. I have read the transcript of the meeting that was made available by the PNCC.
8. I have read the relevant parts of following reports prepared by PNCC:
 - Planner's s42A report
 - Appendix 1: officer recommendations in response to submissions
 - Appendix 2: amendments to District Plan showing officer recommendations
 - Appendix 4: statement of evidence – Mary Wood²
 - Appendix 12: pre-hearing meeting minutes – Horizons Regional Council
 - Appendix 16: pre-hearing stormwater meeting transcript
 - Appendix 19: email between Council and Horizons

Code of conduct

9. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I confirm that I have considered all the relevant and material facts that I am aware of that might alter or detract from the opinions that I express that are within the scope of this evidence, and that this evidence is within my area of expertise.

Scope of evidence

10. My evidence addresses the proposed plan change provisions relating to stormwater management, as well as the requirement under Resource Management Act 1991 for the District Plan to give effect to the relevant provisions of the Horizons' One Plan - Regional Policy Statement.

BACKGROUND

11. Horizons is responsible for managing natural resources across our region, which includes flood control, air and water quality monitoring, pest control, facilitating economic growth, leading regional land transport planning and coordinating the region's response to natural disasters.
12. Horizons made a submission in support of the Proposed PC E, dated 19 November 2024, and a further submission dated 19 December 2024. In its further submission, Horizons opposed the relief sought in submission points S11.001, S11.020, and S11.021, which requested the removal of stormwater permeability standards and related policies.

²Engineer, Technical Lead - GHD Limited, PNCC Stormwater Expert

13. Horizons supports the approach taken by PNCC in Proposed PC E to manage stormwater, as it gives effect to:

- a) Horizons' One Plan Regional Policy Statement UFD-P8 (RPS-UFD Policy 8).
- b) National Policy Statement on Urban Development 2020, Objectives 1 and 8, and Policy 1.
- c) National Policy Statement for Freshwater Management 2020, Objective 1 and Policy 3.

SCOPE OF EVIDENCE

14. My evidence addresses the following matters as they relate to stormwater management:

- Resource Management Act 1991 (RMA).
- National Policy Statement on Urban Development 2020 (NPS-UD).
- National Policy Statement for Freshwater Management 2020 (NPS-FM).
- Horizons' One Plan (One Plan) – Regional Policy Statement (RPS) provisions under the topic *Urban Form and Development* (UFD) that address climate change resilience and stormwater.
- The stormwater management provisions (objectives, policies and rules) in Proposed PC E.
- Appendix 4 of the PC E s42A report: Statement of Evidence by Ms. Mary Wood (PNCC Stormwater Expert).

EVIDENCE

Planning framework

15. RMA s75(3) says:

"A district plan must give effect to—

(a) any national policy statement; and

(b) any New Zealand coastal policy statement; and

(ba) a national planning standard; and

(c) any regional policy statement."

16. NPS-UD Objective 1 says:

"New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future."

17. NPS-UD Objective 8 says:

"New Zealand's urban environments:

- a) support reductions in greenhouse gas emissions;*
- b) and are resilient to the current and future effects of climate change".*

18. NPS-UD Policy 1 says:

"Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

...

- f) are resilient to the likely current and future effects of climate change."*

19. NPS-FM Objective 1 says:

"The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

- a) first, the health and well-being of water bodies and freshwater ecosystems*
- b) second, the health needs of people (such as drinking water)*
- c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future."*

20. NPS-FM Policy 3 says:

"Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments."

21. RPS-UFD Policy 8 gives effect to:

- a) Objectives 1 and 8, and Policy 1 of NPS-UD, which address the future effect of climate change and resilience; and

- b) Objective 1 and Policy 3 of NPS-FM, which seek to manage the effects of the use and development of land on freshwater, including the effects on the receiving environments.

22. RPS-UFD Policy 8 (1) says:

"Urban environments are developed in ways that support reductions in greenhouse gas emissions and improve resilience to the effects of climate change by:

- a. *use of urban design, building form and infrastructure to minimise as far as practicable the contribution to climate change of the development and its future use, including (but not limited to) energy efficiency (including methods to ensure whole-of-life energy efficiency), water efficiency, waste minimisation, transportation modes (including use of public transport and active transport) **water-sensitive design and nature-based solutions,***

...

- c. *requiring a risk-based approach to their resilience to the impacts of climate change, including sea level rise and any increases in the scale and frequency of natural hazard events."*

23. In accordance with s75(3) of the RMA, District Plans are required to give effect to the RPS. Therefore, I consider that the inclusion of permeability standards and related policies is essential to ensure the District Plan gives effect to RPS-UFD Policy 8.

24. In my opinion, the permeability standards and related policies proposed in PC E give effect to:

- i. RPS-UFD Policy 8,
- ii. NPS-UD Objectives 1, and 8, and NPS-UD Policy 1, which address the future effects of climate change and promote resilient, well-functioning urban environments,
- iii. NPS-FM Objective 1 and Policy 3, which seek to manage the effects of land use and development on freshwater, including the receiving environments.

Appendix 4 of the PC E s42A report: Statement of Evidence – Ms. Mary Wood (PNCC Stormwater Expert)

25. Paragraphs 86 and 87 of Ms. Wood's statement of evidence, appended as Appendix 4 to the PC E s42A report, state that she does not agree with the submission point of 11.001, which seeks the removal of the permeability standards and related policies from the Proposed PC E.
26. In paragraph 85 of Ms. Wood's statement of evidence, Ms Wood states that *"the use of specified minimum permeability requirements is necessary to align with modelled runoff and capacity assessments and to provide the ability for some development to occur until wider capacity improvements are in place"*
27. In paragraph 84 of Ms. Wood's statement of evidence, Ms. Wood recognises that, at an overarching level, the permeability provisions in Proposed PC E, including those relating to water-sensitive design and nature based solutions, align with RPS-UFD Policy 8.
28. Relying on Ms. Wood's expert evidence, I consider that the inclusion of the proposed permeability provisions in the District Plan is necessary to enable decision makers to manage the potential effects of urban land use on water quality, and to address the risk of flooding from stormwater discharges.

PC E s42A Report – Mr. Eamon Guthrie (Senior Planner, PNCC)

29. Paragraph 5.26 of Mr. Guthrie's s42A report states that the proposed permeability provisions in PC E are appropriate, and that Mr. Guthrie does not support the removal of the permeability provisions from the Proposed PC E.
30. I agree with Mr. Guthrie that the permeability provisions should be retained, and that those proposed in PC E should be included in the District Plan as notified.

CONCLUSION

31. I consider that it is important to include the proposed permeability standards and related policies in the District Plan to enable PNCC to effectively manage stormwater, and to ensure the District Plan gives effect to National Direction and relevant provisions of the RPS in the resource consenting process.

Aruna Wickramasinghe
For Horizons Regional Council

08 May 2025