

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Palmerston North District Plan – Proposed Plan Change I:
Increasing Housing Supply and Choice.

STATEMENT OF EVIDENCE OF ARUNA BANDARA WICKRAMASINGHE
MUDIYANSELAGE

Dated 11 August 2025

INTRODUCTION

1. My full name is Aruna Bandara Wickramasinghe Mudiyanseleage (**Aruna Wickramasinghe**). My evidence is given on behalf of the Horizons Regional Council¹ (the submitter) in relation to Proposed Plan Change I (PC I). In particular, my evidence addresses the planning matters relating to energy efficiency, climate change resilience, and stormwater management 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.
4. I have over 10 years of professional planning experience, including over 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 for over one and half years.

¹ Manawatū-Whanganui Regional Council

My role

5. I prepared Horizons' submission on PC I, dated 4 February 2025, and the further submission dated 24 March 2025.
6. I have also been involved in the pre-hearing meetings, held on a without-prejudice basis, on:
 - i. 22 May and 12 June 2025 with the representatives of PNCC and Ms. Leana Shirley, Senior Policy Planner (contractor) at Horizons; and
 - ii. 4 July 2025 with the representatives of PNCC, the Natural Hazards Commission, and Mr. Andrew Watt, Coordinator Climate Action at Horizons.
7. I have read the relevant parts of the following reports prepared by PNCC:
 - Section 42A Technical Report of Sarah Jenkin² – Planning
 - Section 42A Technical Report of Mary Wood³ – Stormwater

Code of conduct

8. I confirm that I have read and agree to comply with 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

9. My evidence addresses the provisions in PC I relating to the promotion of energy efficiency, enhancement of community resilience to the effects of climate change, and stormwater management. This is considered in the context of the requirement under the Resource Management Act 1991 for the District Plan to give effect to the relevant provisions of the Regional Policy Statement.

BACKGROUND

10. Horizons is responsible for managing natural resources across the Manawatū-Whanganui 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.

² Planning Consultant (PNCC)

³ Technical Lead – Stormwater (PNCC)

11. Horizons made a submission on PC I, dated 4 February 2025, and a further submission dated 24 March 2025.
12. The Horizons submission supports PC I in principle on the basis that it seeks to give effect to the National Policy Statement on Urban Development 2020 and the Regional Policy Statement by promoting urban intensification and a well-functioning urban environment. However, the Horizons submission also sought further evidence to understand the infill capacity of PCI, along with amendments to provisions in order to improve alignment with the direction of the RPS and NPS-UD.
13. In its further submission, Horizons opposed the relief sought in submission points SO199.5, SO199.8, SO199.22, and SO199.23, that sought the removal or amendment to those parts of PC I that give effect to provisions in the Regional Policy Statement.

OVERARCHING POSITION

14. I support the approach taken by PNCC in PC I to promote efficient use of energy, improve community resilience to the effect of climate change, and manage potential stormwater hazard, as these give effect to:
 - i. National Policy Statement on Urban Development 2020, Objectives 1 and 8, and Policy 1;
 - ii. Horizons' One Plan Regional Policy Statement UFD-Policy 8 (UFD-P8); and
 - iii. Horizons' One Plan Regional Policy Statement HAZ-NH-Policy 8 (HAZ-NH-P8).
15. I agree with the assessment and changes proposed in the s42A report of Ms Jenkins in response to Horizons' submission points.
16. The evidence presented in this statement focuses on the PC I provisions related to climate change resilience and stormwater management.

SCOPE OF EVIDENCE

17. My evidence addresses the following matters:
 - Resource Management Act 1991 (RMA).
 - National Policy Statement on Urban Development 2020 (NPS-UD).

- Urban Form and Development (UFD) provisions of Horizons' One Plan Regional Policy Statement (RPS), which address energy efficiency, climate change resilience, and stormwater management.
- Hazards and risks (Haz-NH) provisions of the RPS, which address risks related to stormwater flooding.
- The energy efficiency and climate change resilience provisions (objectives, policies and rules) in proposed PC I.
- The stormwater management provisions (objectives, policies and rules) in proposed PC I.
- The Section 42A Technical Report (Stormwater) of Ms. Mary Wood.
- The Section 42A Technical Report (Planning) of Ms. Sarah Jenkins.

EVIDENCE

Planning framework

18. 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."

19. RMA s31(1)(b) says:

"Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:

...

(b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—

(i) the avoidance or mitigation of natural hazards; ..."

20. 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."

21. NPS-UD Objective 8 says:

"New Zealand's urban environments:

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

22. RPS-UFD Policy 8 says:

1. *"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,***
- b. urban development being compact, well designed and sustainable, and*
- 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.***

2. *Territorial Authority decisions and controls:*

- a. on subdivision and land use must ensure that sustainable transport options such as public transport, walking and cycling are integrated into land use development, and*
- b. on subdivision and housing, including the layout of the site and layout of lots in relation to other houses/subdivisions, must encourage energy-efficient house design and access to solar energy."*

23. A footnote on page 2-123 of the RPS Hazard and Risks (HAZ-NH) chapter says:

"Flood event does not include the effects of stormwater which are managed by Territorial Authorities under different criteria including engineering, subdivision and design standards/manuals"

24. RPS-HAZ-NH Policy 12 (1) says:

"The Regional Council and Territorial Authorities must manage future development and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which:

1. *ensures that any increase in risk to human life, property or infrastructure from natural hazard events is avoided where practicable, or mitigated where the risk cannot be practicably avoided,”*

25. In accordance with s75(3) of the RMA, district plans are required to give effect to the RPS. Therefore, I consider that provisions related to climate change resilience and stormwater management should be included in the District Plan to give effect to UFD Policy 8 and HAZ-NH Policy 12 of the RPS.

Promoting efficient use of energy and community resilience to the effects of Climate Change

26. MRZ-Policy 10: *Energy Efficiency*, along with the requirements in SUB-MRZ-Policy 1 of PC I relating to energy efficient subdivision design and layout, optimising solar gain, and incorporating water sensitive design, directly give effect to UFD-Policy 8 of the RPS.

27. Paragraph 313 of the s42A Technical Report (Planning) of Ms. Sarah Jenkin states:

“An assessment of SUB-MRZ-P1 will be triggered when a subdivision will result in a non-compliance with a standard/s identified in SUB-MRZ-R1.1. These standards include MRZ-S1 – MRZ-S20 which include landscaping and urban design standards.”

28. In my opinion, SUB-MRZ-Policy 1 is also likely to be triggered by SUB-MRZ-Rule 1 control 3, which relates to *“subdivision design and layout and the size, shape and arrangement of proposed allotments”*.

29. Therefore, I consider it appropriate that MRZ-Policy 10 and the relevant provisions of SUB-MRZ-Policy 1 (as amended) be retained in PC I, as they are necessary to give effect to UFD-Policy 8 of the RPS.

Stormwater Management

30. As it is noted in paragraphs 23 and 24 above, the management of stormwater is addressed under HAZ-NH Policy 12 (*Other types of natural hazards*) in the RPS.

31. HAZ-NH Policy 12(1) of the RPS requires local authorities to manage natural hazard events, which includes stormwater flood hazard.

32. Paragraphs 29, 48, and 52 of s42A Technical Report (Stormwater) by Ms. Mary Wood state that the Stormwater Overlay in PC I is based on the best available data. Ms Wood further notes that removing the overlay would eliminate the key tool available for managing stormwater risks associated with intensification.

33. Relying on Ms. Wood's expert evidence, I consider the Stormwater Overlay to be a key mechanism adopted by PNCC to manage the potential effects of stormwater. It applies to areas identified as potentially being at risk of stormwater flooding, based on the best available data.
34. Paragraph 332 of the s42A Technical Report (Planning) by Ms. Sarah Jenkin states that the level of detail of SUB-MRZ-Policy 4 is appropriate, given the potential extent of flooding effects.
35. Recognising that PNCC has a role in managing stormwater effects arising from urban development, and having regard to Ms. Jenkins's assessment in paragraph 332 of her report, I consider that the requirements in SUB-MRZ-P4 are necessary for managing stormwater flood effects within the area covered by the Stormwater Overlay.
36. In this context, I consider that:
- i. The Stormwater Overlay; and
 - ii. The requirements in SUB-MRZ-Policy 4 (as amended)
- should be retained in PC I to give effect to HAZ-HN-Policy 12 of the RPS and s31(1)(b) of the RMA.

CONCLUSION

37. I consider it necessary to retain MRZ-Policy 10 and the relevant parts of SUB-MRZ-Policy 1 of PC I that promote efficient use of energy and enhance community resilience to the effects of climate change. These provisions ensure that the District Plan gives effect to UFD-Policy 8 of the RPS in the resource consenting process.
38. I also consider it is necessary to retain Stormwater Overlay as notified, and SUB-MRZ-Policy 4 as amended, to ensure effective management of stormwater and to give effect to HAZ-NH-Policy 12 of the RPS and s31(1)(b) of the RMA in the resource consenting process.

Aruna Wickramasinghe
For Horizons Regional Council

11 August 2025