BEFORE HEARING COMMISSIONERS
FOR THE PALMERSTON NORTH CITY COUNCIL

I MUA NGĀ KAIKŌMIHANA WHAKAWĀ
MO TE KAUNIHERA O PAPAIOEA

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of proposed Plan Change I: Increasing Housing Supply and Choice to the Palmerston North District Plan

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JOINT WITNESS STATEMENT

Stormwater

Dated 28 August 2025

A. INTRODUCTION

1. This joint expert witness statement relates to proposed Plan Change I: Increasing Housing Supply and Choice (**PCI**) to the Palmerston North District Plan.

2. The experts attending the conference were:

   (A) Mary Wood (**MW**) for the Palmerston North City Council; and

   (B) Phil Jaggard (**PJ**) for Kāinga Ora.

3. The conference took place on 28 August 2025.

B. AGREED AGENDA

4. The agenda for discussion is set out below in Annexure A.

C. CODE OF CONDUCT

5. This joint witness statement is prepared in accordance with section 9 of the Environment Court Practice Note 2023.

6. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

D. PURPOSE AND SCOPE OF CONFERENCING

7. The purpose of this expert conferencing was to identify, discuss, and highlight points of agreement and disagreement on Stormwater.

E. AGREED ISSUES

8. Refer to Annexure A.

F. DISAGREEMENT AND REASONS

9. Refer to Annexure A.

Date: 28 August 2025

Mary Wood

Phillip Jaggard

ANNEXURE A

Expert conferencing – Stormwater – Philip Jaggard and Mary Wood

Issue	Agreed position with reasons	Disagreements with reasons
Stormwater Overlay		
1. What would be an appropriate percentage impermeable coverage for the modelling?		Mr Jaggard considers 70% to be appropriate as it aligns with the proposed plan. Ms Wood does not agree, referring to parag 18 of reply/rebuttal evidence.
2. Is the modelling and supporting assessment sufficiently robust to support the overlay?		Mr Jaggard considers that there are sites with no flooding within the Stormwater Overlay, and that the impact from development of these at a site level would be insignificant in terms of an on-site and offsite effects basis. Ms Wood disagrees as the modelling is of an appropriate scale for plan change and the supporting assessment considers other factors such as downstream effects, historical information and pipe capacity.
3. Could the Stormwater Overlay extent be reduced through application of a water depth limit?	Could potentially be reduced considering a depth limit, noting that this would require separate agreement on a water depth criteria and provisions	Definition of criteria would still need to be developed agreed

Alternative Permitted Activity Standards		
Issue	**General comment**	**Next steps for discussion**
4. For PJ to describe the technical basis for standards that could be applied for development within the Stormwater Overlay to be able to proceed without requiring a resource consent.	Alternative proposed (PJ) permitted activity standards • Floor levels are already set under the provisions • Off site effects for small events are already set (ie mitigated by attenuation tanks) as per the provisions • Off site flood depth difference for large events assumed to be relatively insensitive to changes in impervious coverage (*parag 18 M Wood evidence*) as per city-wide model outputs, therefore this suggests site specific changes in imperviousness will be even less of an issue • Therefore effect to be managed would be the flood displacement and overland flowpath. So only those sites with extensive flooding/overland flowpath should be required to prepare an assessment, noting large areas in the overlay have no flooding	Definition of 'extensive flooding' and flood displacement/water depth criteria would still need to be agreed and possible provisions drafted.
5. Can stormwater effects be adequately managed through permitted activity standard (ie additional technical criteria) without site-specific assessment?	Possibly, subject to agreement on technical criteria and provisions, as noted above	