

**BEFORE A HEARING PANEL  
CONSTITUTED BY NELSON CITY COUNCIL**

*IN THE MATTER*

of an application by **CCKV Maitahi Development Co LP** and **Bayview Nelson Limited** for a change to the Nelson Resource Management Plan (Plan Change 28)

*IN THE MATTER*

of Part 5 and Schedule 1 of the Resource Management Act 1991

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**STATEMENT OF REPLY EVIDENCE OF DAMIAN VELLUPPILLAI**

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Applicants' Consultant:

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*Name, qualifications and experience*

- [1] My full name is Damian Nathan Velluppillai. I have a Bachelor of Engineering with Honours from the University of Canterbury. I am a Water Resources Engineer with 20 years of experience, currently employed by Tonkin & Taylor Ltd (T+T).

*Reference documents*

- [2] I prepared a Statement of Evidence with respect to Flooding as part of the evidence for the hearing of the PPC28 application, dated 13 June 2022, and a Statement of Rebuttal Evidence, dated 5 July 2022.
- [3] I was involved in reviewing flood risk aspects of the Stormwater Management Plan prepared by T+T, v3.

*Reply evidence*

- [4] I attended the presentations of expert evidence by Mr. Dali Suljic and Ms. Kate Purton relating to flood effects at the Private Plan Change 28 (PPC28) Hearing and heard their responses to the questions posed by the Panel of Commissioners.
- [5] I note that issues relating to flood risk raised by Mr. Suljic and Ms. Purton were largely focused on whether sufficient information had been provided by the Applicant to demonstrate the feasibility of achieving required stormwater and flooding performance objectives within the site, and the suitability of the proposed provisions to manage potential effects downstream.
- [6] In earlier application material and evidence, I provided my opinion that **if** post-development peak flows could be limited to no more than pre-development peak flows, then the flood hazard in the receiving Maitai River and floodplain would not be increased as a result of the proposed plan change and development of the site, even though total runoff volumes and durations would increase. My opinion, and the sufficiency of the information used to support it, were not challenged by other experts.

- [7] Evidence on the feasibility of meeting the above criteria, i.e. the attenuation of post-development peak flows to pre-development levels has been provided by Mr. Maurice Mills.
- [8] Ms Purton referred to “gaps and inconsistencies” she had identified in the Stormwater Management Plan provided prior to the hearing and provided four examples of those in her evidence. These four items covered requests for additional information (e.g. flood model build details) and minor corrections (e.g. adding labels to a figure for clarity, and corrections to tabulated attenuation requirements) and have been addressed as part of the updates made to the Stormwater Management Plan since the Hearing.
- [9] I agree with other experts that the Stormwater Management Plan should set out objectives (or performance standards) with respect to flood hazard. Subsequent planning and design stages for any development within the PPC28 area would be required to demonstrate achievement of these objectives these through appropriate plan provisions and consent conditions.
- [10] Having reviewed the proposed provisions, my opinion is that satisfactory management of flood effects can be delivered for development in the PPC28 area.

Dated 28 July 2022



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Damian Velluppillai – Water Resources Engineer