

**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 MAURICE GRAEME  
MILLS**

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## **Name, qualifications, experience, and code of contact**

- [1] My full name is Maurice Graeme Mills. My qualifications and experience are set out in my statement of evidence. I confirm I continue to abide by the Code of Conduct for Expert Witnesses.

## **Reference documents**

- [2] I prepared a Statement of Evidence with respect to infrastructure (water supply, wastewater, and stormwater) as part of the PPC28 application, and a Statement of Rebuttal Evidence.
- [3] I was involved in preparing stormwater aspects of the Stormwater Management Plan prepared by Tonkin & Taylor Ltd, v3, dated 29 July 2022.
- [4] I attended the presentations of expert evidence by Mr David Wilson 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.

## **Reply Evidence**

- [5] I note that issues relating to stormwater raised by Mr. Wilson 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.
- [6] In my earlier evidence I stated that stormwater treatment is not required or currently proposed for runoff from roads within the Walters Bluff/Brooklands catchment.
- [7] Based on feedback from Mr. Wilson and Ms. Purton we have reconsidered this and now propose to provide treatment of rainfall runoff from all road surfaces where it is physically possible to provide devices, subject to Nelson City Council as the ultimate asset owner, being supportive of this. On the steeper roads servicing small lot areas this is likely to consist of proprietary

type treatment devices while on the ridgeline road there may be scope for rain gardens and swales.

- [8] To address the concerns of the Section 42a comments regarding gaps and inconsistencies in the SMP, the report has been updated to address these comments, together with consideration of the concept master plan, which was not available when the earlier SMP was produced.
- [9] I acknowledge that further work is required on the SMP to create an integrated stormwater management plan; however, this is more appropriate to be undertaken at future consenting stages when the master plan and construction sequencing has been confirmed.
- [10] In my earlier evidence I stated that in my opinion the Stormwater Management Plan (SMP) provides a sufficient information to clearly set out the stormwater and flood risk management requirements for future development of the site, and how it shall be demonstrated that these have been met, to a level appropriate to support a plan change application. I am still of this opinion.
- [11] Having reviewed the draft PPC28 provisions, it is my opinion that satisfactory management of stormwater can be achieved.

Dated 28 July 2022



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Maurice Mills