BEFORE THE HEARING PANEL

IN THE MATTER	OF THE RESOURCE MANAGEMENT ACT 1991
A N D	
IN THE MATTER	OF PROPOSED PLAN CHANGE 29 TO THE NELSON RESOURCE MANAGEMENT PLAN

REBUTTAL STATEMENT OF EVIDENCE OF DAMIAN NATHAN VELLUPPILLAI

TONKIN & TAYLOR LTD

15 August 2024

INTRODUCTION

QUALIFICATIONS AND EXPERIENCE

1 My full name is Damian Nathan Velluppillai.

2 My qualifications and experience were set out in my Primary Statement of Evidence dated 10 June 2024. I repeat the confirmation in my Primary Statement of Evidence that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

3 In this statement of rebuttal evidence, I respond to the evidence of David McColl (Manuka Street Hospital) relating to flood hazard mapping at the Manuka Street Hospital site.

KEY ISSUE 1 – FLOOD HAZARD MAPPING AT MANUKA STREET HOSPITAL

4 In paragraphs 6.3 and 7.3 of his evidence, Mr. David McColl submits that the flood mapping that the proposed PC29 flood hazard and high flood overlays are based on does not reflect more recent changes in site levels.

5 I confirm my agreement with Mr. McColl (as set out in the *Joint Witness Statement – Flooding*) that the existing raised and retained carpark area on the site has been elevated above the modelled 2130 RCP8.5M 1% AEP flooding on which the hazard overlays are based. I would expect that when the flood model is next updated, including inclusion of more recent ground levels, that this area would not be shown to be affected by river flooding. Therefore, in my opinion and in agreement with Mr. McColl, both the flood hazard and high flood hazard overlays can be removed ('clipped') from the following two lots:

   a NL60/201 Pt Sec 517 City of Nelson

   b NL60/202 Pt Sec 517 City of Nelson

6 The above two lots are marked in red on Figure 1 below.



Figure 1: PC29 Flood Hazard Overlay and High Flood Hazard Overlay can be removed from the two labelled parcels, as ground levels in these parcels have been elevated since the time of LiDAR capture and are now significantly higher than modelled flood levels. Source: Shape Nelson ePlan and TopoftheSouthMaps.

Damian Nathan Velluppillai
15 August 2024

t:\nelson\projects\1006675\1006675.5101\workingmaterial\evidence - rebuttal\pc29 rebuttal evidence of damian velluppillai - v1.docx