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LMS:AW

The Governance Team
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Tēnā koe,

SUBMISSION: PROPOSED STORMWATER STRATEGY 2026-2056

Thank you for the opportunity to make a submission on Palmerston North's Draft Stormwater Strategy 2026 - 2056. We also appreciate the extension given to enable us to lodge this feedback after the closing date.

Horizons Regional Council (**Horizons**) is responsible for the integrated management of the region's natural resources, including freshwater quality, freshwater ecosystems, discharges to land and water, natural hazard management, and climate change adaptation. Horizons also has a key role in implementing national direction, including the National Policy Statement for Freshwater Management and the National Policy Statement for Natural Hazards, both of which have strong links to stormwater management.

Environmental planning is a key function of Horizons. The One Plan provides an integrated framework for managing the region's natural resources and identifies four key environmental issues: surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened indigenous biodiversity. The Regional Policy Statement component of the One Plan includes objectives and policies relating to natural hazard avoidance and mitigation, as well as objectives and policies which guide urban development to manage stormwater risk and adapting for climate change.

Horizons supports the overall direction of the Strategy and its recognition that stormwater management is one of Palmerston North's most significant long-term challenges. We support the holistic approach of the Strategy to managing stormwater, including the integration of flood risk management, climate change adaptation, water quality, growth planning, and environmental outcomes.

In particular, we support the seven outcomes identified in the Strategy, which collectively promote:

- improved collaboration and leadership across agencies, mana whenua, communities, and future water service providers,
- resilience and affordable stormwater infrastructure that supports sustainable growth and adapts to climate change,
- better integration of land use planning, freshwater management, and stormwater management,
- reduced flood risk and improved community resilience,
- stronger connections between people and water,
- recognition of the cultural significance of water and the contribution of mātauranga Māori to stormwater management, and
- greater use of nature-based and water sensitive design approach to improve environmental outcomes.

We also support the Strategy's emphasis on the priority actions identified for the first five years and the proposed review of the Strategy in 2031. In particular, we support efforts to:

- strengthen stormwater capability and technical capacity,
- improve the information base through monitoring, modelling, and flood risk assessment,
- investigate catchment scale and nature-based stormwater management approaches,
- improve the information base through monitoring, modelling, and flood risk assessment,
- investigate catchment scale and nature-based stormwater management approaches,
- improve community awareness and understanding of stormwater management, and
- foster collaborative approaches between Palmerston North City Council, Rangitāne o Manawātū, Horizons Regional Council, Central Districts Water, neighboring councils, and the wider community.

In reviewing the draft we have noted a few minor matters which we raise below to ensure the intent of the One Plan and/or wording is clear in the strategy.

1. **Figure 2, page 13:** the descriptor for Figure 2 implies that it represents flood risk for the Palmerston North area when in fact it actually shows rapid surface (runoff/surface) modelling. We recommend the statement be amended to include stormwater in the description which would correct the statement and align with the descriptions used when discussing "stormwater flooding" throughout the draft strategy.

"Stormwater Flooding risk for people and property in Palmerston North from a significant storm event. This maps shows the modelled water depths for a one in 200-year flood event (Map 28 in the Future Development Strategy 2024). The Palmerston North City Council boundary is shown as a dashed red line."

2. **Page 10, Section 1.2.1:** We note a minor typo where "harakeke" is mentioned twice: "These wetlands, streams and their margins - once teeming with harakeke, raupō, tuna, and rich birdlife, harakeke (flax), raupō (bulrush), tuna (eels), -..."

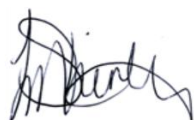
3. **Section 2.1, page 12:** in the list of sources looked at to identify stormwater challenges for Palmerston North, we suggest adding the One Plan as a reference document, given it was part of our engagement as the stormwater strategy was being developed.
4. **Page 15, section 2.6:** the final paragraph discusses the National Policy Statement for Natural Hazards and lack of complete information available to assess potential impacts from climate change. While we acknowledge the reality of incomplete information, we suggest some additional wording which reflects the current NPS Natural Hazards is a short-term interim measure to address gaps in the Resource Management Act. We suggest the following additional wording:

The National Policy Statement for Natural Hazards is a short-term interim measure intended to address a gap in the Resource Management Act. At the time of writing this strategy, the Planning Bill and Natural Environment Bill are before the Environment Select Committee. These Bills are intended to establish a modern planning framework and include goals relating to the management of risk from natural hazards, and (if passed into law) will make up a new system to replace the RMA.

Thank you again for the opportunity to provide feedback on the draft Stormwater Strategy for Palmerston North.

Horizons **does not** wish to be heard in support of this submission, however welcome any questions of clarification. Please direct any enquiries to Policy@horizons.govt.nz

Nāku noa, nā



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