

**BEFORE AN INDEPENDENT HEARINGS COMMISSIONER
NEW PLYMOUTH DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER an application by **ALL GOOD PROPERTIES LIMITED** for resource consent to subdivide land at Tawa Street, Inglewood into 13 unit titles ("Proposal")

Council Ref: SUB21/47746 and LUC21/47723

STATEMENT OF EVIDENCE BY PAUL STANLEY

Dated 17 June 2022

Govett Quilliam
THE LAWYERS

Rebecca Eaton
Phone: (06) 768 3700
Fax: (06) 768 3701
Private Bag 2013/DX NP90056
NEW PLYMOUTH 4342
rebecca.eaton@gqlaw.nz

STATEMENT OF EVIDENCE BY PAUL STANLEY

1. INTRODUCTION

1.1 My name is Paul Stanley. I am a Director and Chartered Professional Engineer with Stanley Gray Civil & Structural Engineers.

Qualifications and experience

1.2 I hold a Bachelor of Engineering Degree with Honours, in Civil Engineering and am registered as a Chartered Professional Engineer, under the Chartered Professional Engineers New Zealand Act 2002.

1.3 I have been working as an engineer for 19 years. My experience includes a diverse range of civil and structural engineering which incorporates engineering design, site-based engineering, contracts management and quality assurance. My practice area over the last 6 years has been specifically focussed on residential and commercial design in the Taranaki region, with typical work involving residential and commercial design including structural, foundation and stormwater design.

1.4 My involvement in the Proposal has included:

1.4.1 Preparation of Engineer's Report for the Proposal.

1.4.2 Review of the submission made regarding the application; and

1.4.3 Review of the Section 42A Report ("Officer's Report").

1.5 I have visited the application site and the surrounding area on approximately 6 occasions and am familiar with it and the surrounding environment

1.6 I have reviewed the Consent Application prepared by Bland & Jackson Surveyors Ltd ("the Application").

Expert Witness Code of Conduct

1.7 I confirm that I have read, and agree to comply with, the Environment Court's Code of Conduct for Expert Witnesses (Environment Court of New Zealand Practice Note 2014). This evidence I am presenting is within my area of expertise, except where I state that I am relying on the evidence of another person. To the best of my knowledge I have not omitted to consider

any material facts known to me that might alter or detract from the opinions I express.

Involvement in the Proposal

1.8 In 2021 I was engaged by All Good Properties Limited to provide an Engineer's Report for the Proposal in response to the Council's section 92 request for further information.

Scope of evidence

1.9 In my evidence I will comment on:

1.9.1 The Proposal;

1.9.2 Summary of Engineering assessment

1.9.3 Response to submitter;

1.9.4 Council Officer Report;

1.9.5 Conditions of consent; and

1.9.6 Conclusion.

2. THE PROPOSAL

2.1 The Proposal is well described and outlined in the application documents, further information submitted by the applicant and the evidence of others and I do not propose to provide a further description.

3. SUMMARY OF ENGINEERING ISSUES AND ASSESSMENT

3.1 Key engineering related issues encountered during site investigation were in relation to ground bearing and stormwater disposal. In particular:

3.1.1 The first issue related to Building Code clause B1 Structure, in relation to the ground bearing for the foundations.

3.1.2 The second issue related to Building Code clause E1 – Surface water, in relation to high groundwater levels and on-site stormwater disposal.

- 3.2 These issues are typical of the surrounding area and are able to be mitigated by the recommendation of specific engineering design as set out in the Engineer's Report and summarised below.
- 3.3 To ensure a stable, flood free building site could be created, we recommended that the foundations of the dwellings comprise timber driven SED piled foundations, designed by a suitably qualified engineer.
- 3.4 Groundwater levels were encountered at 1.2m below existing ground level during soil testing, meaning that the site was not suitable for conventional soak holes. Accordingly we recommended a shallow Rain-cell system be adopted in the design. An additional mitigation measure, at the request of the New Plymouth District Council ("NPDC"), meant that the preliminary design was revised to allow for a more conservative annual exceedance probability of 1%.
- 3.5 I consider that the above measures will appropriately mitigate risk of the Proposal in relation to ground bearing and stormwater proposal.

4. RESPONSE TO SUBMITTER

- 4.1 I understand that one submission has been received regarding the Application from Jessica and Dale de Jongh ("the Submitter").
- 4.2 I have reviewed the above submission.
- 4.3 The submission raises the following concerns related to my area of expertise:
- 4.3.1 The impact the Proposal on the level of flooding on Tawa Street.
- 4.4 The 1% AEP stormwater design results in no additional post development flow onto Tawa Street. Secondary flow will be towards Tawa Street and then enter the Kurapete Stream. Accordingly, I consider that the concerns raised by the Submitter are appropriately mitigated by the stormwater design for the Proposal.

5. **COUNCIL OFFICER REPORT**

5.1 I have reviewed the Section 42A Report for the Application as it relates to my area of expertise. I agree with the statements in the Report that relate to my area of expertise and do not wish to make any further clarifications.

6. **CONDITIONS OF CONSENT**

6.1 I confirm that the proposed conditions of consent are appropriate to address the ground bearing and stormwater issues that have been identified.

7. **CONCLUSION**

7.1 The site investigations highlighted two key engineering issues relating to the ground bearing for the foundations and the high groundwater levels and on-site stormwater disposal.

7.2 The issues encountered were expected, as they are typical of the surrounding area. In order to mitigate the associated risk, we recommended specific engineering design in relation to the foundations and stormwater disposal. In addition, a more conservative approach to stormwater design was recommended by the NPDC and was incorporated into the engineering design for stormwater disposal. These aspects of engineering design have been appropriately included and referenced in the recommended conditions of consent.

7.3 In conclusion, I consider that the specific engineering design adopted by the Proposal, in addition to the recommended conditions of consent will sufficiently mitigate the identified ground bearing and stormwater disposal issues.



Paul Stanley
17 June 2022