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Tēnā koe

## WAITOMO PROPOSED DISTRICT PLAN

### Introduction

Thank you for the opportunity to make a submission on the Waitomo Proposed District Plan (PDP).

At Horizons Regional Council (Horizons) our responsibilities include managing the Manawatū-Whanganui region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

Environmental planning is a key function. Horizons integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

Horizons' interest in the PDP is as one of the regional authorities for a section of the affected area. In this submission, we consider the proposed plan change in context of giving effect to the regional policy statement components of Horizons' One Plan, and ensuring that these changes would not be inconsistent with the regional plan provisions<sup>1</sup>. Horizons does not meet the criteria of gaining an advantage in trade competition through this submission and therefore is not limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

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<sup>1</sup> As set out in section 75 of the Resource Management Act 1991

## Natural Hazards

The relevant provisions from the RPS are:

- Objective 9-1 (Effects of Natural Hazards)
- Policy 9-2(b)

We see that Chapter 23 Natural Hazards has been framed to acknowledge and give effect to One Plan Chapter 9, which sets the Manawatū-Whanganui regional approach to natural hazards. We generally consider that the approach gives effect to the responsibilities allocated to territorial authorities in One Plan Policy 9-1. In particular we support objectives NH-O1, NH-O4, NH-O5 and policies NH-P12 and NH-P13.

We note that the PDP identifies areas where some types of new development must be avoided because of the risk from natural hazards; specifically the High Risk Flood Zone. Policy 9-2(b) of the One Plan provides restriction for development in areas which have the potential to be prone to large scale flooding events. Only Te Kuiti has been identified as a High Risk Flood Zone (HRFZ) meaning that no area in the Manawatū-Whanganui region of the district has been identified as a HRFZ. Horizons therefore supports in particular policy NH-P11, which acknowledges the presence and potential impact of natural hazards outside these defined areas and appears to signal an adaptive management approach.

However, Horizons notes that there may be some inconsistency in this approach against One Plan Policy 9-2. Policy 9-2(b) requires territorial authorities to maintain strict rules on development in areas prone to flooding:

- b. Regional council and territorial authorities must not allow the establishment of any new structure<sup>^</sup> or activity, or an increase in the scale of any existing structure<sup>^</sup> or activity, within an area which would be inundated in a 0.5% AEP (1 in 200 year) flood event unless:
  - i. flood hazard avoidance<sup>\*</sup> is achieved or the 0.5% AEP (1 in 200 year) flood hazard is mitigated, or
  - ii. the non-habitable structure<sup>^</sup> or activity is on production land<sup>^</sup>, or
  - iii. there is a functional necessity to locate the structure<sup>^</sup> or activity within such an area, in any of which cases the structure<sup>^</sup> or activity may be allowed.

The PDP has used a 2D Hydraulic Modelling system to model areas that would be inundated at an AEP of 1% (1 in 100 year) flood event based on a Representative Concentration Pathway (RCP) of 8.5. The 8.5 RCP takes into account climate change factors and models these areas more closely to a current day 0.5% AEP. The potential inconsistency arises where the PDP is not clear on whether this 8.5 RCP is used to identify a High Risk Flood Zone. To fully give effect to the One Plan Part 1, we ask Waitomo District Council to clarify whether or not the 1% AEP takes into account the 8.5 RCP in the HRFZ provision which would more closely resemble the policy intent of the One Plan's 0.5% AEP.

Conclusion

Horizons generally supports the Waitomo PDP, subject to the comments within this submission. Horizons seeks the relief set out in its submission above, or any further alternative or consequential relief that achieves the outcomes sought.

We do not wish to be heard in support of this submission but are happy to provide clarification on any matters raised in this submission as required.

Nāku noa, nā



Nicolaas Portegys  
SENIOR POLICY ANALYST

Enclosures      Horizons' Draft Waitomo District Plan Feedback – 2 June 2022

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