File No: 25 05 00G
Document No: 18385317
Enquiries to: Sarah Lealand

Waikato
REGIONAL COUNCIL
Te Kaunihera à Rohe o Waikato

30 March 2021

Private Bag 3038 Waikato Mail Centre Hamilton 3240, NZ

waikatoregion.govt.nz 0800 800 401

Neale Russell Ltd and Palms on George Ltd C/- Bloxam Burnett & Olliver Via email: cdawson@bbo.co.nz

Attention: Chris Dawson

Kia ora koutou

I am writing to you in relation to your submission on the Waikato District Plan Review in which you have requested a rezoning of the Mercer airfield to enable extension of the existing airfield activities on the site.

Your submission says that:

- Mercer Airport does not rely on any Council provided reticulated infrastructure apart from access to a formed public road; and
- consideration of potential natural hazards and how the related risks will be managed are not applicable.

This is incorrect. The Mercer airfield is located in an area that benefits from both flood and drainage infrastructure provided by the Waikato Regional Council (WRC).

The airfield is located upstream from, and within the catchment of, the Motukaraka pump station, which is required for both drainage and flood protection. I have attached maps taken from WRC's hazard portal showing the area defended by the WRC stopbank along the Maramarua Stream, and the land drainage district in which the airfield sits. WRC's Hazard Portal can be viewed at Waikato Regional Hazards Portal (arcgis.com)

Any development on this land, irrespective of its zoning will need to consider:

- the potential risks related to being located within an area defended from a flood hazard to a specified service level and the residual risks, including how these residual risks are exacerbated by increasing the intensity of development in defended areas,
- that land drainage services are to rural service levels only and that there is no current intention to increase these levels; and
- that significant increases in impervious services may increase the volume and speed of run-off, impacting on the ability to maintain current drainage services levels resulting in increased flood hazard risks from ponding.

WRC did not make a further submission on submission #921 and is not intending in participating at Hearing 25 specifically on this submission. However, I wish to draw your attention to my evidence for Hearing 25 – Zone extents relating to WRC's flood and drainage infrastructure. I have included the relevant paragraphs (16.4 - 16.7) from my evidence below:

Flood and drainage infrastructure managed by WRC is included in the definition of 'regionally significant infrastructure' under the WRPS, therefore Policy 6.6 and Implementation Method 6.6.1 apply.

Flood infrastructure is designed to manage flood events based on particular land uses. For example, the acceptable level of flood risk for pastoral farming, and the subsequent level of infrastructure investment required for this land use, is quite different to the acceptable level of flood risk for residential development. I believe that that zoning decisions should consider how the change in land use might also change expectations of the level of flooding infrastructure service delivery provided by WRC.

A number of the areas proposed for growth are beside or within areas that have land drainage systems that are funded through a targeted rate on benefiting landowners. These drainage areas are managed for pastoral land use. Under these schemes WRC has three days to remove surface flooding from a 10% AEP event. The discharge of semi-urban or urban stormwater in to existing rural designed drainage channels can negatively impact drainage channels which suffer from additional discharge flow volumes over longer duration, conflicting with WRC audited performance requirements. If there are areas that are expected to have significantly increased discharge into drainage networks through urbanisation, it is anticipated that the responsibility of those networks should be taken over by the district council to manage. This will need to be factored into infrastructure calculations going forward and be part of a changed operating, and subsequent rating, landscape for the district council.

I consider it is both appropriate and necessary that flooding and drainage infrastructure be considered alongside the other core infrastructure, such as three waters and transport infrastructure, when enabling an increase in land use intensity to accommodate growth.

I will also provide a copy of this letter to the Hearings Panel for their information.

If you would like more information, or should you wish to discuss the matter further, please contact Sarah Lealand, Manager of the Lower and Central Waikato, Integrated Catchment Management Directorate, on 07 859 2781 or Sarah.Lealand@waikatoregion.govt.nz

Kind regards

Miffy Foley

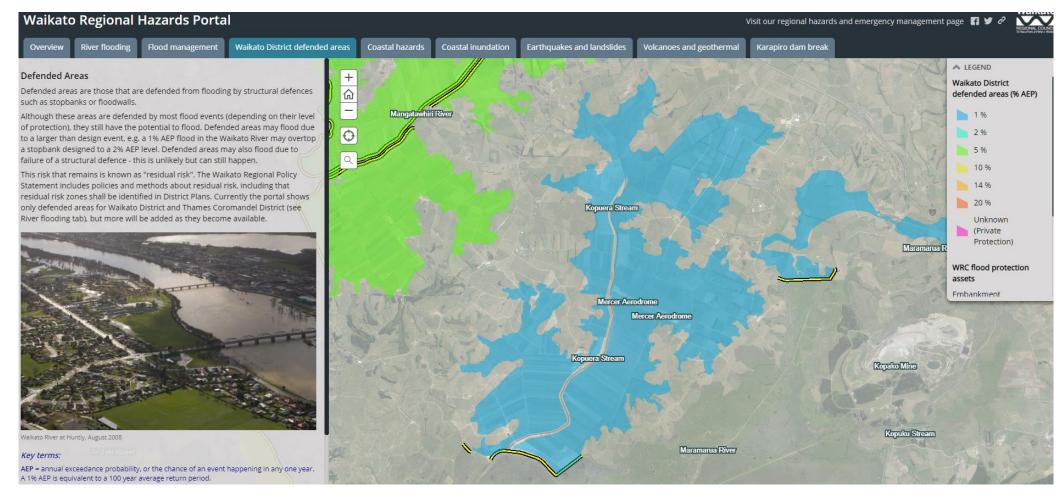
Senior Policy Advisor, Policy Implementation

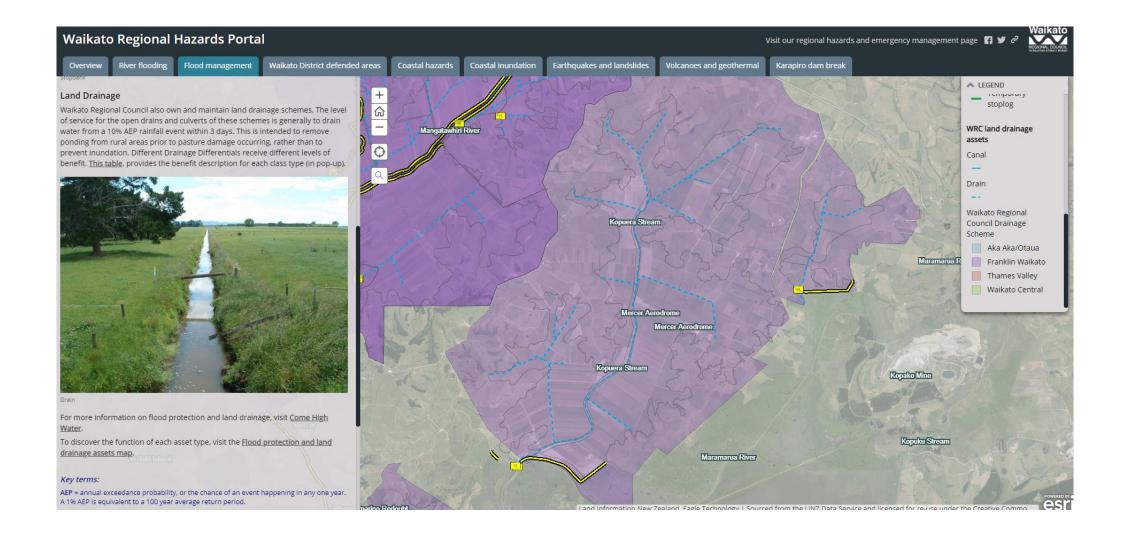
cc. The Hearings Panel for the Waikato District Plan Review

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Attachment - Map extracts from WRC's Hazard Portal





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