

**SUMMARY STATEMENT OF EVIDENCE OF CHRISTOPHER JAMES SCRAFTON
ON BEHALF OF POKENO VILLAGE HOLDINGS LIMITED IN RESPECT OF
STAGE 2 OF THE PROPOSED WAIKATO DISTRICT PLAN – NATURAL
HAZARDS**

PLANNING

Pokeno Village Holdings Limited Submission

- 1.1 As set out in its submission, PVHL supports Stage 2 to the Proposed Waikato District Plan (PWDP) subject to amendments to provisions to:
- (a) Recognise and require an integrated catchment management approach to stormwater management.
 - (b) Provide greater clarity with regard to information required to support resource consent applications.
 - (c) Recognise the complexity associated with hazard mapping.
- 1.2 I discuss each of these points in more detail in my primary statement of evidence for Stage 2.

Integrated Stormwater Management

- 1.3 In my view Catchment Management Plans (CMPs) are a useful tool to support urbanization and to inform Long Term Plans (LTPs) in terms of necessary infrastructure requirements.
- 1.4 Where a CMP has been developed to support rezoning of land (and considered through a first schedule RMA process), it is appropriate for development within the CMP area to be in general accordance (or similar) with the CMP. Being in general accordance could include (for example):
- (a) Design standards for urban development to be included within the provisions.
 - (b) A requirement for identified stormwater infrastructure to be provided at certain locations.
- 1.5 I do not agree with the Reporting Officer that Policy 15.2.1.15 and the associated rules are sufficient to adequately support a catchment-based approach to stormwater management. My main concerns with Policy 15.2.1.15 are:

- (a) It requires new subdivision and development within floodplains, flood ponding areas and overland flow paths to adopt integrated catchment plan-based stormwater management methods which achieve a number of listed matters. However, there is no guidance in the policy or elsewhere within the PWDP that I am aware of as to what integrated catchment plan-based stormwater management methods are. In my view, the plan should include guidance as to what Councils expectations are for the development of CMPs.
- (b) Whilst referenced in the policy a CMP is not identified within the information requirements as being required to support new subdivision or development. In my view, a CMP should be a requirement to support urbanization.
- (c) It does not recognize that a catchment-based approach to stormwater management may result in changes to floodplains and overland flowpaths.
- (d) It does not recognize that the minimization of impervious surfaces is not always appropriate or desirable and other approaches to stormwater management may be identified through a CMP process.
- (e) It does not include a requirement for new subdivision or development within new urban areas to have regard to or to be in general accordance with an approved (or adopted) CMP.

Hazard mapping

- 1.6 In its submission PVHL requested that, at a minimum, non-statutory maps showing areas that warranted natural hazard risk assessments be included in the PWDP noting that providing the maps as non-statutory layers allows for regular updates to the maps to reflect changes in the environment without the need for a first schedule RMA process. The Reporting Officer disagrees with this recommendation noting (amongst other things) that the flood modelling information is not uncertain.
- 1.7 From my experience the accuracy of floodplain modelling is generally limited by budget, extent of area to be modelled and other matters such as achieving access to private property to ground truth modelling and regardless of the accuracy of the modelling undertaken, it still only represents an estimate of the situation at the time the model was undertaken. I consider that it will become more inaccurate as a result of development and changes in the environment. For example, the development of a stop bank can have a

fundamental change to the extent of a floodplain. In such a scenario, applicants will be required to acquire resource consent (for a discretionary activity) for activities identified within the mapped floodplain which in reality are no longer within a floodplain. I consider this to be inefficient and an unnecessary burden on the community.

1.8 To address this issue, PVHL has recommended that the floodplain mapping be retained as a non-statutory layer as opposed to a statutory layer. In my view this approach allows for the floodplain mapping to be updated by Council as required without the need for a first schedule RMA process. To supplement this approach and to provide sufficient technical veracity of changes to floodplain mapping, I would recommend a rule or other method that identifies that a potential applicant is required to provide the Council that the floodplain doesn't apply, the associated provisions of the plan should not apply. I note that a similar approach has been adopted in Auckland and from my experience this approach is an efficient and appropriate method. I consider this approach to be appropriate as it:

- (a) Avoids the costly first schedule process for minor mapping amendments; and
- (b) Is unlikely to result in any transparency issues as raised by the Reporting Officer. For example, I do not consider that an applicant seeking to update the floodplain mapping could propose to divert the floodplain to a third-party property without having the approval of the third-party. Further to this point, the decision of whether the floodplain mapping requires updating or not would be at the discretion of the Council.

1.9 In my view, this approach is appropriate as ground proofing of modelling is likely to result in a more accurate assessment of where the floodplain is, particularly where a floodplain has changed since the modelling has been embedded in the plan.