Submission to Mackenzie District Council on Plan Change 28 – Hazards and Risks

I am making a submission relating to the proposed insertion of Hydro Inundation overlay into the Eplan maps as it pertains specifically to Pukaki Airport where I live and have a business.

I have been researching the available information provided by the council, relating to the potential hydro inundation and discussing this proposal with other stakeholders in the area and am very concerned about how this would impact current and potential landowners at the airport.

From what I have read and listened to, my first concern is the proposed Hydro inundation mapping in appendix 7 of the PC 28 of the District Plan, shows catastrophic consequences of a Pukaki Inlet Dam breach.

The council have advised in answering questions about the flood inundation plan that there "has been no change to the risk of flood inundation" yet they only now wish to advise landowners and put it on the LIMS

I note that while this information is only just now being proposed to be put into the district plan, it is clear from information that I have found that this information has been known for a long time. Definitely back to 2013 when an environment court decree said that Meridian and the council should be consulting with affected landowners. They did not.

Up until late 2015 the Pukaki Airport board were unaware of this also and they were happily selling sections on the airport development.

At the April 2017 meeting Meridian were categorically told by the Pukaki Airport board members that landowners did not know about the hydro inundation risk.

The general consensus from the meeting in April 2017 was that the Hydro inundation information should be included on the LIM reports along with explanatory notes from Meridian regarding the extremely low risk of actual Pukaki Inlet Dam breach, in an earthquake.

Our LIM when we purchased 9 Avro ave did not have any information on the LIM.

I also know that people who purchased other sections in the airport zone who had no mention of Hydro Inundation mapping on their LIM.

And now the council wants to include this mapping in the district plan following the current review process.

1. I note that the council does not appear to want to prevent hydro inundation on the airport itself, and therefore our sections and the ratepayer land they are charged

with looking after on behalf of the ratepayers, remains unprotected. All the mitigation seems to be around emergency evacuation and limiting what can be built on the airport subdivision. The airport itself is included in the list of critical infrastructure that would need to be restored in the aftermath of a Natural Hazard event. I would have thought preventing damage to the airport runways through hydro inundation, would have been a high priority, given that the airport is likely to be needed to evacuate the 10,000 people potentially in the district in an AF8 event or an Ostler Fault 7+ earthquake if it happened in the height of tourist season.

I note that protection of the airport was bought up in the recorded meeting in April 2017 by Graeme Smith (the then Mayor) and Meridian did not think they had responsibility to provide protection through earthworks. The remarks indicate it would not be cost effective given the very low risk of the Pukaki Inlet Dam breach happening and then causing the hydro inundation that they were modelling. Comment was made that the money would be better spent on ensuring the dam didn't breach in the first place, but they had already done that and were very confident it would not breach and therefore the logical conclusion is that the hydro inundation would not happen. However in the district plan review documents we are submitting on Para 6.5 pn page 17 Meridian state "whilst the infrastructure is designed to meet the highest structural standards, there remains a risk that failure can occour as a result of a major earthquake. While the likelihood of structural failure is very low the consequences can be serious for people and property."

Why are the MDC not insisting that Meridian build protection to mitigate this residual risk to people and property, particularly the ratepayers airport property, given it's a critical asset.

2. As to attempts to bring in regulatory controls after purchase, would the council not be at risk of legal action given none of us have been informed ever in writing about the hydro inundation.

Proposals/Solutions

1. The MDC insists that Meridian take responsibility for the residual risk that remains of the very unlikely event of dam breach and provide protection for the ratepayer's assets and therefore also the properties at the airport. They are clearly good at finding engineering solutions, surely, they could come up with an earthworks/ structure that could protect the airport. It's Meridians asset that could fail and therefore their hazard. The airport was in existence before the dam.

2. While having no issue that the flood inundation risk mapping be included in the district plan, with subsequent emergency planning, I would like to also see that the inundation mapping that will finally be included in LIMS, is also accompanied by remarks from Meridian regarding extremely low risk of hydro inundation actually

occurring due to their confidence in their extremely safe dam. Dam breach while possible is unlikely.

3. The modelling of hydro inundation of the airport, is in essence theoretical only in a specific set of circumstances.

4. If Meridian are not prepared to do this then that suggests perhaps they may not have the confidence in the dam, they purport to have and the council then needs to refer to proposal one above.

5. The purpose of adding contextual comments to the Mapping by Meridian would go a long way to protecting the airport section owner's property values and property rights. It would be also very helpful to have a mathematical number put to the risk. E.g 1 in 10,000 chance of dam breach occurring as alluded to in the meeting in April 2017.

This would hopefully ensure that insurance companies did not take this information and load our insurance premiums accordingly.

6. I would not like to see any further regulatory control put on the airport section owners regarding what can and can't be built other than what is already provided for. I note the council is not happy with the direction taken in regard to activities on some properties, in the airport subdivision, however a robust resource consent process and strict adherence to the rules already in place would prevent this from happening. Enforcing compliance would be a good start.

7. If the council in their wisdom were to adopt the Hydro inundation mapping with out context comments on the risk of a Hydro dam breach, and this impacted our property value, insurance premiums and property rights, I would think that I along with a large number of other section owners would have legal redress given the council did not inform us via our LIM and resource consent processes that hydro inundation was a possibility. The mapping that has now been done should have been done long before now, given that information was clearly available.

8. This information would have possibly given many of us a reason to reconsider our section purchase and or building, and is likely to have resulted in lawyers, bankers and insurance companies advising us not to purchase on the first place. I have no doubt the council at that time were very keen to see sections sold and development happened on the airport and the council have benefited financially from this. It appears that advice to include the mapping on the LIMs was conveniently ignored.

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I acknowledge that the information above and all other information provided in this submission will be made publicly available.

I do not wish to be heard in support of this submission

I am not willing to do a joint presentation with people with a similar position at the hearing.