



SUBMISSION ON PROPOSED PLAN CHANGE 28 HAZARDS AND RISKS, HISTORIC HERITAGE AND NOTABLE TREES, VARIATION 1 TO PLAN CHANGE 26, AND VARIATION 1 TO PLAN CHANGE 27 TO THE MACKENZIE DISTRICT PLAN

FORM 5
UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991

Please note all information provided in this submission will be made publicly available

Details of Submitter

Full Name: (Required)	Chris White
Contact Person: (If different from above)	50 Rhoburo Rd, Twizel 7901
Email Address: (Required)	Chris @ greenstonefund.com
Postal Address: (Optional)	
Telephone Number: (Required)	022 477 3761

Trade Competition

~~I~~ I could not (delete one) gain an advantage in trade competition through this submission.

If you have selected could, please answer the question below:

I am / I am not (delete one) directly affected by an effect of the subject matter that:

- adversely affect the environment; and
- does not relate to trade competition or the effects of trade competition.

Submission Details

The specific provisions of the proposal that my submission relates to are as follows:

Plan Change 28 - Hydro Inundation
We are opposed to this section
and how it effects Lyford Lane

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and the lack of actual risk assessment
likelihood of hydro-inundation events
Submission is Attached

I support/ oppose these provisions:
(include whether you support or oppose in full or in part)

See Attached submission

The reason(s) for my submission are:
(state in summary your reasons, and whether you seek any amendments)

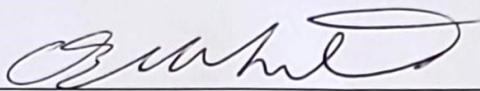
See Attached Submission

I seek the following decision from the Mackenzie District Council:
(give precise details)

See Attached submission

I wish to be heard in support of my submission.
 I do not wish to be heard in support of my submission.
(Tick one box)

If others make a similar submission I **would** / **would not** (circle one) be prepared to consider presenting a joint case with them at any hearing.


Signature of submitter or person authorised to sign on behalf of submitter
(A signature is not required if you make your submission by electronic means)

22-1-25 12:57pm

Date:

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language; or
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Once the closing date for submissions has passed, Council will publicly notify all submissions received, prepare a summary of submissions, and will allow a period for further submissions in support of, or in opposition to, those submissions already made.

Council hearings for the plan changes will then be arranged to consider all submissions. Anyone who has made a submission and indicated that they wish to be heard will have the right to attend the hearings and present their submission.

If you have any questions regarding Plan Change 28 and the variations, or the submission process, please do not hesitate to contact the Planning Department at 03 685 9010 or via email districtplan@mackenzie.govt.nz

January 22, 2025

Submission on MDC District Plan Change 28

Name - 158 Lyford Lane – White Family - Chris White

chris@greenstonefund.com

Submission:

We are opposed to the proposed section on hydro inundation in the plan and specifically how it affects our 158 Lyford Lane property, and the future financial value, and ability to cost consciously build dwellings.

1. PC 28 includes Hydro Inundation mapping that will affect the future development and building of a house on all Lyford Lane properties.
2. The existing PC28 policy statement and approach does not include an evidence-based approach to the future likelihood of the flood risk events in the event of a canal burst. The work to date is grossly underappreciated as to the actual risk, likelihood, and outcomes of such events. Evidence is lacking for such dramatic proposals.
3. We believe MDC and councilors should represent ratepayers of Lyford Lane in assessing the actual risk and likelihood of the probability of a high inundation event occurring on Lyford Lane.
4. National Planning Standards require a risk-based approach to policy framework and planning. The hydro inundation section should be removed until the necessary work is completed from a risk standpoint.
5. By solely relying on a worst-case consequence approach, MDC is ignoring its duties under the RMA and to Mackenzie ratepayers to take a risk-based approach to managing hazards in the region and follow a sustainable development ethos across its planning framework.

6. MDC is imposing significant restrictions on Lyford Lane property rights without an evidential policy process.
7. The implementation of hydro inundation has significant negative effects on ours and other Lyford Lane landowners' property rights and values. These include, but not just limited too.
 - a. Increased insurance costs and annual premiums. Even the possibility of declining coverage.
 - b. Owners' ability to borrow or lend against our Lyford property. Possible limiting of our ability to refinance a mortgage or obtain a mortgage.
 - c. A significant loss of property value as potential buyers in the Lyford zone are so discouraged by MDC existing policy wording. One local Twizel realtor has already mentioned this to us.
 - d. Building restrictions concern us greatly, as we have alerted MDC through multiple submissions of our intent to build a family home on our 158 Lyford Lane. You can effectively restrict the building by onerous requirements on foundations, building sites, etc. Not knowing the likelihood of hydro inundation or actual risks, how can MDC in good faith impose such future restrictions around building.
8. Meridian considers the risk of a canal breach failure as extremely unlikely, and their main concern seems to be on evacuation. We hope that MDC takes a similar approach, and not negatively impacts the building of sensible dwellings down Lyford Lane.
9. Meridian have had updated modelling completed and are required by the Environment Court decree to share this information with landowners and MDC. Has this been provided to Lyford Landowners on request?
 - a. Have MDC provided any and all of their policy assessment documentation, internal correspondence or discussion papers to Lyford Lane landowners upon request?
10. MDC needs to understand the risk of flood inundation. Especially before limiting landowners' property rights. It is not acceptable to make major planning changes based on something 'extremely unlikely' or 'very unlikely' happening. We need a proper risk assessment of the hydro flood inundation and in what direction and exactly where, height and for how long this would last.

- a. It is our families understanding that the Pukaki canal was built to break on the top side (west side) towards the BenOhau range in the event of an earthquake. This is based on family conversations with MoW when the canals were originally under construction.

Some historic context: Ministry (MoW) engineers had several meetings with the Cameron family from Benohau Station about potential Hydro Inundation events. Ours and other families also attended these meetings.

- When the Pukaki canal was being built from Lake Pukakai along towards Lake Ruataniwha several onsite meetings occurred with the expert engineers and designers from MoW responsible for the canal being built. These meetings covered earthquakes along the Southern Alps and the Ostler Fault, and how the Pukaki canal would break uphill in the unlikely event a canal breach should ever occur.
- The level of detail discussed around earthquakes was substantial and families came away impressed how the engineers had thought about natural disasters, potential canal breaks, and where the water would flow in such events.
- It is obvious when under construction and completion, and even when one drives along the canal that the topside (West and Benohau side) of the canal was narrow/narrower in several places and the bottom side (the east side) of the canal was designed broader and also with stronger more robust materials than/when compared to the topside canal wall. The reason for this was that the canal would break easily to the topside and limit inundation consequences towards the east of the canal. The engineers had thought extensively on this matter of a canal breach.
- It was explained that the curvature and narrowness complement natural topographic areas where if an earthquake occurred the canal would 'always break on the topside' and then pond on the westward/topside in the Benohau range catchment area/s. **MOW and the engineers deliberately designed weak points on the topside of the canal so as no inundation or canal break would occur on the bottom side in the event of earthquakes.**

This should be taken into account of any risk assessment of likelihood of canal inundation at Lyford Lane.

- Everything was designed to flow up and outwards toward the Benohau range in event of an earthquake.
- Engineering experts also explained that there are many culverts under the canal and not just where the culverts and rivers like Fraser stream, Dry stream and Twizel flow under the canal. These culverts are designed to take water away from the topside break and then disperse water downstream in an orderly manner.
- It was also explained that the likelihood of an earthquake canal bursting event was in the 3,000-16,000-year range, and that if this occurred, they had mitigated this with canal design to break towards the upside/topside/westward edge of the canal towards the Benohau range.

Chris White