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**Sent:** Wednesday, 22 January 2025 6:14 am

**To:** District Plan <[districtplan@mackenzie.govt.nz](mailto:districtplan@mackenzie.govt.nz)>

**Cc:** Zac Ashley <[zashley150@gmail.com](mailto:zashley150@gmail.com)>; Brian Smith <[briansmithadvisory@xtra.co.nz](mailto:briansmithadvisory@xtra.co.nz)>

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

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Dear Mackenzie District Council,

We are writing regarding Plan Change 28 (PC28) and the proposed inclusion of Hydro Inundation Mapping in the District Plan, particularly as it affects Pukaki Airport.

Our company, Tussock Hill Enterprises Limited, owns the land at 5 Avro Place at the airport.

We wish to highlight three key points:

**1. The extremely low probability of major flooding**

A Pukaki Inlet Dam breach is highly unlikely. The dam's design adheres to the highest structural standards, supported by rigorous maintenance and monitoring. While theoretical failure under specific extreme circumstances is acknowledged, the probability of such failure is extremely low. Meridian has expressed confidence in the dam's integrity and this should be clearly reflected in any public communication, such as the District Plan and LIM reports. Failing to contextualize this low risk in official documents misrepresents the hazard, potentially causing unnecessary alarm and confusion among residents, stakeholders, and investors.

**2. Potentially damaging economic implications of overregulation**

The proposed mapping and any overly restrictive regulations could adversely affect property owners, the local economy, and the Council's investments. Without adequate explanation of the low probability of a dam breach, property values at Pukaki Airport risk significant devaluation. Potential buyers, insurance companies, and banks may view the land as excessively risky, regardless of the actual likelihood of flooding. Misrepresented hazard risks could lead to inflated insurance premiums or reluctance from financial institutions to lend against these properties. The airport is a critical infrastructure asset - overregulating development or activity at this site undermines its long-term viability and economic contributions to the region. Any new regulations must balance the need for safety with the rights and interests of property owners.

**3. Growth and infrastructure pressures**

The Mackenzie District is experiencing strong growth, driven by its appeal as a tourism and

lifestyle destination. This growth places increasing demands on already overstretched infrastructure. It is vital that the Council facilitate development, not restrict it - restrictive policies on land use at Pukaki Airport may discourage future investment, hindering development and economic growth. A clear explanation of the actual risk, backed by credible modelling from Meridian, should accompany the hazard mapping. This will ensure stakeholders make informed decisions without unnecessary fear. The airport's strategic importance, particularly during emergencies, underscores the need for proactive protection of this key infrastructure rather than restrictions that could limit its usability in critical times.

**Proposed actions:**

1. Contextualize the hydro inundation mapping: Include explicit statements from Meridian regarding the low probability of a dam breach and quantify the risk (e.g., "1 in 10,000 years"). Ensure this context appears in the District Plan and LIM reports to prevent misinterpretation of the hazard.
2. Limit new regulatory restrictions: Maintain existing land use provisions without introducing additional restrictions. Instead, focus on robust enforcement of current resource consent conditions.
3. Engage Meridian for additional protections: Require Meridian to implement measures (e.g., earthworks) to protect key infrastructure such as the airport from residual risks, ensuring its operational viability during emergencies.

The inclusion of Hydro Inundation Mapping in the District Plan should not proceed without detailed risk contextualization to avoid undue economic and regulatory consequences. Overregulation risks stifling growth and undermining the long-term potential of Pukaki Airport and the Mackenzie District as a whole.

We appreciate the opportunity to provide feedback on PC28 and trust that the Council will carefully consider these concerns.

Yours sincerely,

Directors of Tussock Hill Enterprises Limited;

Zac Ashley – MBus (Economics), MMgt (Management), PGDip (Aviation).

Nick Ashley – MAv (Aviation Management), MMgt (Management).

Brian Smith – BCom (Accounting & Economics), Life Member Apopo (formerly Institute of Public Works Engineers Australasia – IPWEA)

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

**Do you wish to be heard in support of your submission? (I do)**

**If others make a similar submission would you be prepared to consider presenting a joint case with them at any hearing? (I would)**