
Anonymous User just submitted the survey Submission Form - Plan Change 28: Hazards and Risks, Historic Heritage and Notable Trees, and Variations with the responses below.

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

Acknowledged

Do you believe you could gain an advantage in trade competition through this submission?

No

Are you directly affected by an effect or the subject matter that adversely affects the environment and does not relate to trade competition or the effects of trade competition?

Yes

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

See attached

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

Oppose in part

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

See attached

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

ZSee attached

Do you wish to be heard in support of your submission?

I do not

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

I would

If you have any additional supporting information as part of this submission please attach it here.

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District plans change 28 submission

Introduction

The proposed district plans changes contained in Change 28 and the attendant annexes have brought to light very significant negative implications for Council and land owners in affected areas. The purpose of this submission is to identify the implications, draw Council's attention to them, prevent further Council errors and suggest remedies.

Pukaki Airport is identified as a strategic asset, and as such, needs to be protected against threats such as natural disasters. Plans change 28 details the effect of a Pukaki dam failure as a result of an earthquake and the resultant inundation of the airport in up to 2 m of flood water. The airport is not protected.

The Pukaki Dam is the responsibility of Meridian Energy. As such they are responsible for any risks which arise from their extremely profitable operation of the infrastructure. The risk to the airport and adjacent properties has not been mitigated.

Pukaki Airport is owned and operated by Council and is therefore subject to the risk visited upon them by a failure of Meridian's infrastructure. Meridian have an obligation to mitigate risks which arise as a result of their infrastructure. Meridian have not done anything to mitigate the risk. Council have similarly done nothing to compel Meridian to mitigate the risk.

The freehold home hangar blocks on Pukaki Airfield were sold by the Council to private owners. Those blocks and all the development subsequently carried out are subject to the same risk of inundation and loss from a dam failure. Council knew of the risk, if not the full magnitude of the risk as early as 1990. Council has not taken any action to mitigate the risk to the airport or surrounding land.

Land owners were not informed of the risks of inundation when the blocks were sold even though Council were well aware of the risk prior to selling the development blocks. No mention of this risk was contained in the LIMS for the airport development properties. This omission, if unaddressed, will have a profound effect on the present commercial value and future resale value of the properties. It is likely to adversely affect insurance premiums, the ability to raise finance for development and the incentive to invest in airport development generally. In the worst case landowners could suffer a total loss, without compensation. This is unacceptable. Council, not landowners, must bear full responsibility for the consequences of Council omission.

Council's proposal to reduce risk by limiting development on the airfield development blocks will further reduce the value of the hangar blocks and the development on each block. Land owners are expected to bear the cost of Meridian and Council's refusal to mitigate the risk and Council's omission to fully disclose the risk affecting land they have sold in the airport development. Council's proposal does nothing to reduce the risk to existing development in the airport development land.

Suggested Remedies

The first step must be to verify the accuracy of the flooding predictions. It is not clear how the inundation predictions have increased by a factor of ten from the original estimates.

The second step must be for Council to compel Meridian to accept responsibility for the risk and take positive action to mitigate the risk to the strategic asset and the land surrounding it. This could be as simple as a 2.5m protective dam surrounding the airfield - taking care to allow for future airport runway extension. Because the only means of escape in the event of a large earthquake is via the motorway, the continued viability of the bridge crossing the Twizel river is critical. If that bridge fails following a major earthquake resulting in a dam failure, the results will be multiple fatalities.

The third step must be for Council to accept responsibility for :

1. not acting to compel Meridian to reduce the risk to a strategic asset
2. not informing / misleading land purchasers of the extent of the risks affecting the property sold by Council
3. not acting to fully protect a strategic asset

The fourth step should be for Council to take no further action which would further diminish the value of the existing properties by imposing further restrictions on development for airport development blocks.

The fifth step should be for council to clearly establish and publish in the district plan and the applicable LIMS, the likelihood of an earthquake of sufficient magnitude to cause the failure of the Pukaki dam infrastructure and subsequent inundation.

Conclusion

The failure of Meridian infrastructure and the subsequent inundation of the land downstream of the Pukaki Dam would result in the loss of a strategic asset which is most needed following a natural disaster such as an earthquake. Meridian need to accept and diminish that risk.

Council have been remiss on several fronts, namely they failed to disclose the real risk to property they sold as part of the airport development. Secondly they failed to act upon information that they have had for decades to compel Meridian to mitigate the risk of dam failure. They have not verified that the sole means of escape from the airport in the event of a major earthquake and inundation would be viable following such a natural disaster. Finally they threaten to shift the burden of reduced property value onto the land owner and further diminish the value of the affected properties by imposing further restrictions on development on existing properties. This is not acceptable.

Mitigation of the risk is Meridian's responsibility and council needs to ensure Meridian meet their obligation. They can afford to protect the airport and the adjacent properties. They need to do so.

John ten Have
Chairman
Pukaki Airport Owners Group.