

**Submission ID:** 64199

**Submission Date:** 2023-02-09  
15:40:46

Schedule 1 of the Resource Management Act (RMA) 1991

**To: Matamata-Piako District Council**

**Submitter's Details**

**Name (individual/organisation):**

Waikato Regional Council

**Contact person (if different from above):**

Ashleigh Ngow

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**This is a submission on Plan Change 54: Papakāinga**

**The specific provisions of the plan change that my submission relates to are:**

3. WRC has feedback in relation including a reference to “other natural and physical resources” in two provisions. We also make a suggestion to include additional objectives and policies relating to the use of water and energy and climate resilience. WRC also notes the location of two of the MPZ Precinct areas within WRC drainage schemes and the need to adopt appropriate measures and controls to manage flood risk in these areas. We also raise specific concerns regarding the location of Waiti Marae (within the MPZ Precinct 1) and its vulnerability to flooding.

**My submission is:**

Both in support and in opposition (with recommendations).

**I seek the following decision from Council:**

Accept the plan change with the following amendments

**Suggested amendments:**

Please see the attached submission document for detail on suggested amendments.

**I wish to be present at the council planning hearing:**

Yes

**I would be prepared to present a joint case at the hearing with others making a similar submission:**

Yes

**I could gain an advantage in trade competition through this submission.**

No

**Please complete the following:**

I am directly affected by an effect of the subject matter of this submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

**Upload additional info (if necessary):**

[63e45d2ed84ea-Waikato Regional Council Submission on Plan Change 54 - Papakainga.pdf](#)

**Notes:**

- The submission and decision you wish Council to make should only relate to the contents of the proposed plan change.
- Submissions close at **4.30pm, Monday 13 February 2023.**
- I accept that by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public. After the closing date, all submissions received will be available for public viewing.
- [Click here to view MPDC's Privacy Policy](#)

File No: 25 06 00  
Document No: 25133087  
Enquiries to: Ashleigh Ngow



13 February 2023

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Tēnā koe,

**Waikato Regional Council Submission to the Matamata-Piako District Council (MPDC) on the Matamata-Piako District Plan Change 54: Papakāinga**

Thank you for the opportunity to make a submission on the Matamata-Piako District Plan Change 54: Papakāinga. Please find attached the Waikato Regional Council's submission. Please note this feedback was signed off under delegation by the Director Science, Policy and Information. The Waikato Regional Council looks forward to being involved in further discussion on this subject.

Should you have any queries regarding the content of this document please contact Ashleigh Ngow, Graduate Policy Advisor, Policy Implementation directly on +6478586075 or by email [Ashleigh.Ngow@waikatoregion.govt.nz](mailto:Ashleigh.Ngow@waikatoregion.govt.nz).

Ngā mihi,

A handwritten signature in blue ink, appearing to read "Tracey May". The signature is stylized and fluid.

Tracey May  
Director Science, Policy and Information

**8 December 2022**

### **Introduction**

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission on the Matamata-Piako District Plan Change 54: Papakāinga (“the plan change”). WRC has been actively involved in this plan change process by providing feedback and attending hui.
2. WRC is supportive of the plan change and commends MPDC on the approach taken to actively involve tangata whenua and key stakeholders in this process.
3. WRC has feedback in relation including a reference to “other natural and physical resources” in two provisions. We also make a suggestion to include additional objectives and policies relating to the use of water and energy and climate resilience. WRC also notes the location of two of the MPZ Precinct areas within WRC drainage schemes and the need to adopt appropriate measures and controls to manage flood risk in these areas. We also raise specific concerns regarding the location of Waiti Marae (within the MPZ Precinct 1) and its vulnerability to flooding.
4. We look forward to continuing discussions regarding the development of the plan change and in particular, would like to collaborate with MPDC to address flood risks to the proposed Waiti Marae development area (within MPZ Precinct 1).

### **Submission**

5. WRC supports the plan change and commends MPDC on the approach taken to develop the plan change in collaboration with iwi and key stakeholders.
6. WRC is supportive of MPDC’s approach to create a new Māori Purpose Zone with two separate precincts (MPZ Precinct 1 and Precinct 2), and the incorporation of district-wide provisions to allow flexibility for papakāinga development in various forms and locations.
7. In relation to provision MPZ-O1 and Papakāinga-O1, it is recommended that these clauses are reworded as follows:
  - a. “Enable Māori to maintain and enhance their traditional and cultural relationship with their ancestral land and other natural and physical resources and to enhance their social, economic and cultural wellbeing.”
8. WRC also considers that an additional objective and subsequent policies relating to climate resilience and responsiveness to environmental change could be included. This would support and encourage papakāinga development that both mitigates and adapts to a changing climate.

Suggested wording:

Objective:

Support and enable sustainable papakāinga developments that are climate-resilient and are responsive to environmental change.

Policies:

1. To encourage the efficient use of water and energy in papakāinga developments by:
  - a. Utilising water sensitive features (such as rainwater collection tanks and low-flow fittings);

- b. Enabling the use of renewable energy; and
  - c. Providing for electric mobility and associated charging infrastructure.
2. To increase community resilience and reduce exposure of papakāinga developments to natural hazard and climate change risks by:
- a. Locating buildings and infrastructure outside of areas currently affected by natural hazards and their associated risks and those potentially affected in the future;
  - b. Designing papakāinga to be adaptable to a range of changing environmental conditions and changes in temperature, rainfall, water availability and wind;
  - c. Supporting the use of mātauranga Māori to guide the design of papakāinga to be adaptable to natural hazards and climate change risks; and
  - d. Supporting existing development to adapt and where necessary, relocate.
9. It is noted that two of the MPZ Precinct areas are within WRC managed drainage schemes. The Waiti Marae is within the Central drainage scheme and the Raungaiti Marae is within the Thames Valley drainage scheme. Appropriate drainage techniques should be employed to manage any cumulative impacts on the drainage schemes.
10. WRC has specific concerns regarding the Waiti Marae, given that it is located downstream from the Waiti Detention Dam and is subject to flooding during a 2% annual exceedance probability (AEP) flooding event. As indicated in Figure 1 below, the Waiti Dam Spillway (see yellow and black dashed line), the Waiti Dam (dark blue line) and the Waiti stop bank (solid yellow and black line) traverse or adjoin the subject site. These are flood management assets owned and managed by WRC.

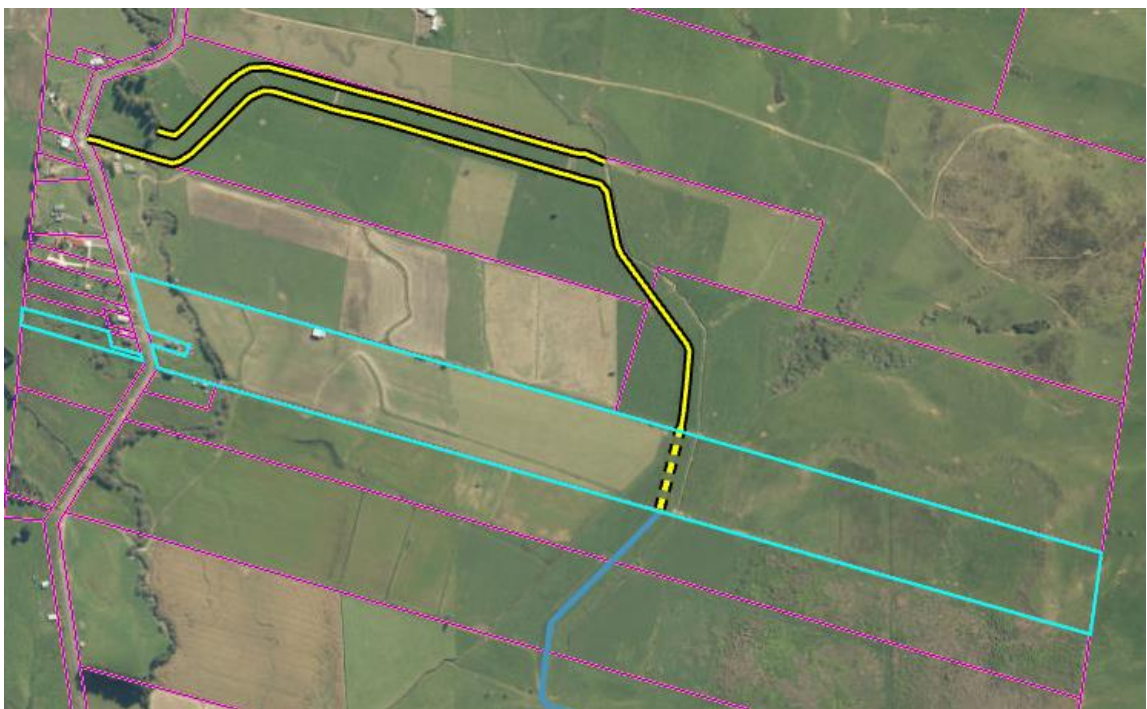


Figure 1. Aerial image demonstrating WRC flood management assets at Waiti Marae

11. Generally, WRC advises against developing sites that are subject to natural hazard risk. In this case, development in this location may result in the Waiti Dam upgrading in classification from a low potential impact classification (PIC) dam to a high PIC dam – under the New Zealand Society on Large Dams Dam Safety Guidelines. This upgrade in classification will require a higher frequency of monitoring and engineering management, which will likely increase overall management costs for MPDC, WRC, the developers, and ratepayers in the Matamata-Piako district.

12. In addition to this, climate change is expected to exacerbate rainfall and flood flows and therefore, it is likely that the current 2% AEP protection provided will become a 5% protection in 50 years, which means that the current spillway will operate more often than it currently does, and overland flow depth will increase.
13. Any development occurring on this site must adopt measures to reduce flood risks to people and property. To ensure this, WRC recommends amending the provisions in the MPZ Precinct 1 chapter and reducing the extent of the MPZ Precinct 1 overlay in the Waiti Marae Map. Key amendments should include, but are not limited to:
  - Reducing the extent of MPZ-Precinct 1 overlay on this site to only cover areas suitable for development, including:
    - Areas outside of the flood detention ponding zone on the site (outside of low-lying areas to the east of the Waiti Dam);
    - Parts of the site directly adjacent to Waiti Road;
    - Areas on higher ground to the north-east of the Waiti Dam Spillway, rather than across the entire site;
  - Ensuring access is provided to WRC in perpetuity to ensure that monitoring and maintenance of flood protection and management assets can continue;
  - Requiring flood risk mitigation measures such as minimum finished floor levels (FFL) for proposed buildings and ensuring accessways are built above flood levels.
14. WRC is concerned about the proposed development in this area and would like to work collaboratively with MPDC and the landowners to reduce and address the flood risks to people and property.
15. Overall, WRC commends MPDC on the plan change and looks forward to continuing discussions regarding its development.

### Submitter details

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I could not gain an advantage in trade competition through this submission  
I am not directly affected by an effect of the subject matter of the submission that:  
(a) does not adversely affect the environment; and  
(b) does not relate to trade competition or the effects of trade competition.

### Further Information and Hearings

WRC **wishes to be heard** at the hearings for the Matamata-Piako District Plan Change 54: Papakāinga primarily in support of this submission and is prepared to consider a joint submission with others making a similar submission.

WRC **could not** gain an advantage in trade competition through this submission.