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Note: You must fill in **ALL** sections of this form.
Submissions close **5pm Thursday, 02 July 2026**.

1. Submitter details

Full name of submitter:	Gavin Longstaff and Sarah Wyatt
Contact name if different from above:	
Contact phone number(s)	
Email address:	
Address for service: (required if no email address is provided)	

We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

2. This is a submission on the following proposed plan change to the Waipā District Plan

Proposed Private Plan Change 36 – Ōhaupō Large Lot Residential Extension

3. Trade competition

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

4. Attendance at Council hearing

Select one	☐	YES I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
	☐	I do not	
If others make a similar submission, I will consider presenting a joint case with them at the hearing.			☐ Yes ☐ No

5. The specific provisions of the plan change my submission relates to are: (give details)

Select one	☐	I SUPPORT
	☒	I SUPPORT IN PART
	☐	I OPPOSE

6. My submission is: (please include the reasons for your view)

See Attached

7. I seek the following decision/s from Council: (give precise details – e.g. what you would like the wording of a specific provision (or map) to be changed to)

See Attached

8. Signature of submitter (note: a signature is not required if you make your submission by electronic means, however please type your name below)

Signature of submitter: (or person authorised to sign on behalf of submitter)	Sarah Wyatt and Gavin Longstaff 02/07/2026	Dated
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Note to person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the consent authority is satisfied that at least 1 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;
- 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.

Personal Information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991. The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you.

Your submission, including your name and contact details, will be made available for inspection at all Council service centres and libraries in accordance with the requirements of the Act. It may also be made available on the Council's website. A document summarising all submissions, including names and contact details of submitters will be posted on the Council's website

If you believe there are compelling reasons why your contact details should be kept confidential please contact the processing planner for this application.

G Longstaff and S Wyatt
73 Ryburn Rd
OHAUPO
WAIPA
3883

The Secretary
Planning Department
Waipa District Council
101 Alexandra Street
TE AWAMUTU
WAIPA
3800

Thursday 2 July 2026

PC36
Honey Comb Developments LP
Requested Zoning Change from Rural Zone to Large Lot Residential
5, 7 and 13 Ryburn Road and 4336 Ohaupo Road, Ohaupo

We refer to the above planning application and we wish to make the following submission in relation to the rezoning.

We wish to **conditionally oppose** the application to rezone the land listed in this application and in the following document have supplied our reasons.

Based on the attached document, we trust that our concerns will be taken into consideration prior to a decision being reached on Private Plan Change 36.

Should this application go to a Public or Council Meeting or Hearing, we wish to speak.

Kind Regards,

Garvin Longstaff

Sarah Wyatt

Conditionally Opposed Submission

Private Plan Change 36

Submitted By

Gavin Longstaff and Sarah Wyatt

Contract Milkers

We conditionally oppose Private Plan Change 36. While we do not oppose appropriate residential growth in principle, we oppose this rezoning unless it can be clearly demonstrated that downstream flooding, drainage performance, traffic safety, productive farmland and environmental values will be no worse than they are under existing conditions.

We are not opposed to the development in principle; however, rezoning should not proceed until independent investigations demonstrate that downstream flooding, drainage, traffic, productive farmland, and environmental values will be no worse off.

Our Interest

We manage one of the downstream dairy farms every day and have observed this catchment through multiple flood events over many years.

Gavin is in his twelfth season working this land. Gavin started in June 2015, working for the previous Farm Owner, prior to the sale of the farm in 2022. After the sale of the farm, Gavin was retained by the new owners for his knowledge of the land and animals that they had purchased.

Sarah is in her fifth season working this land. Sarah has lived on this land since March 2020 and when the farm was sold in 2022, went into the Contract Milking Business with Gavin. In this time, Sarah has developed an in-depth understanding of how water moves through this catchment and how the land responds during wet conditions.

Our evidence is supported by photographs dating back to 2017, recent flood events, annotated maps and our firsthand observations.

Existing Catchment

The proposed development is located within an existing rural catchment that drains through a network of roadside drains, farm drains, board drains and culverts before passing through downstream farmland, including the dairy farm that we manage.

We are the contract milkers responsible for the day-to-day management of the farm immediately downstream of the proposed development, as well as a nearby leased support block. Through managing these properties over a number of years, we have developed a detailed understanding of how water moves through this catchment during both normal rainfall and significant storm events.

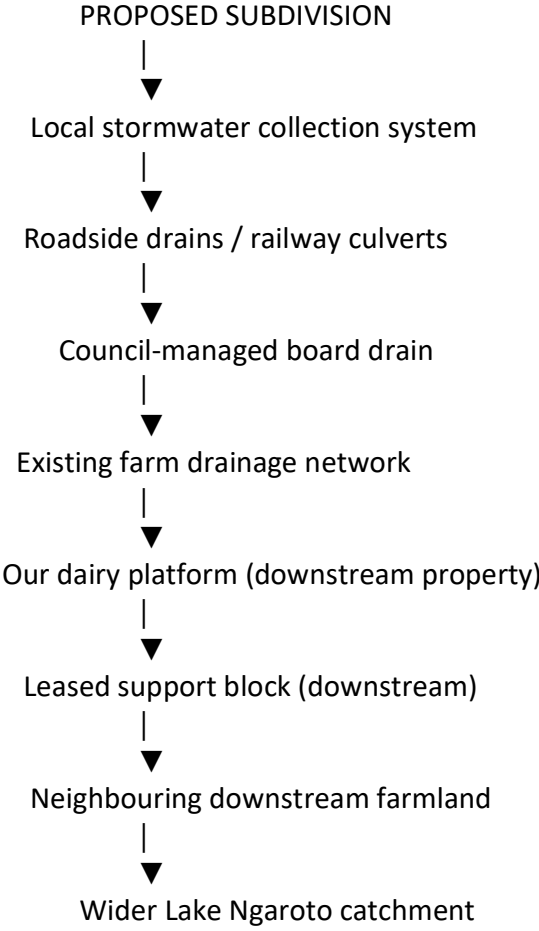
The drainage pathway from the proposed development ultimately flows through the drainage network adjoining the railway corridor before entering downstream board drains and farm drainage systems. This water then continues through our dairy platform, our leased support block, and neighbouring farmland before eventually contributing to the wider catchment that drains towards Lake Ngaroto.

This means our farming operation sits directly downstream of the proposed development and receives the cumulative effects of runoff generated from land further upstream. Any increase in stormwater volume, peak flow, or the duration of discharge has the potential to add further pressure to a drainage network that already experiences capacity constraints during wet periods.

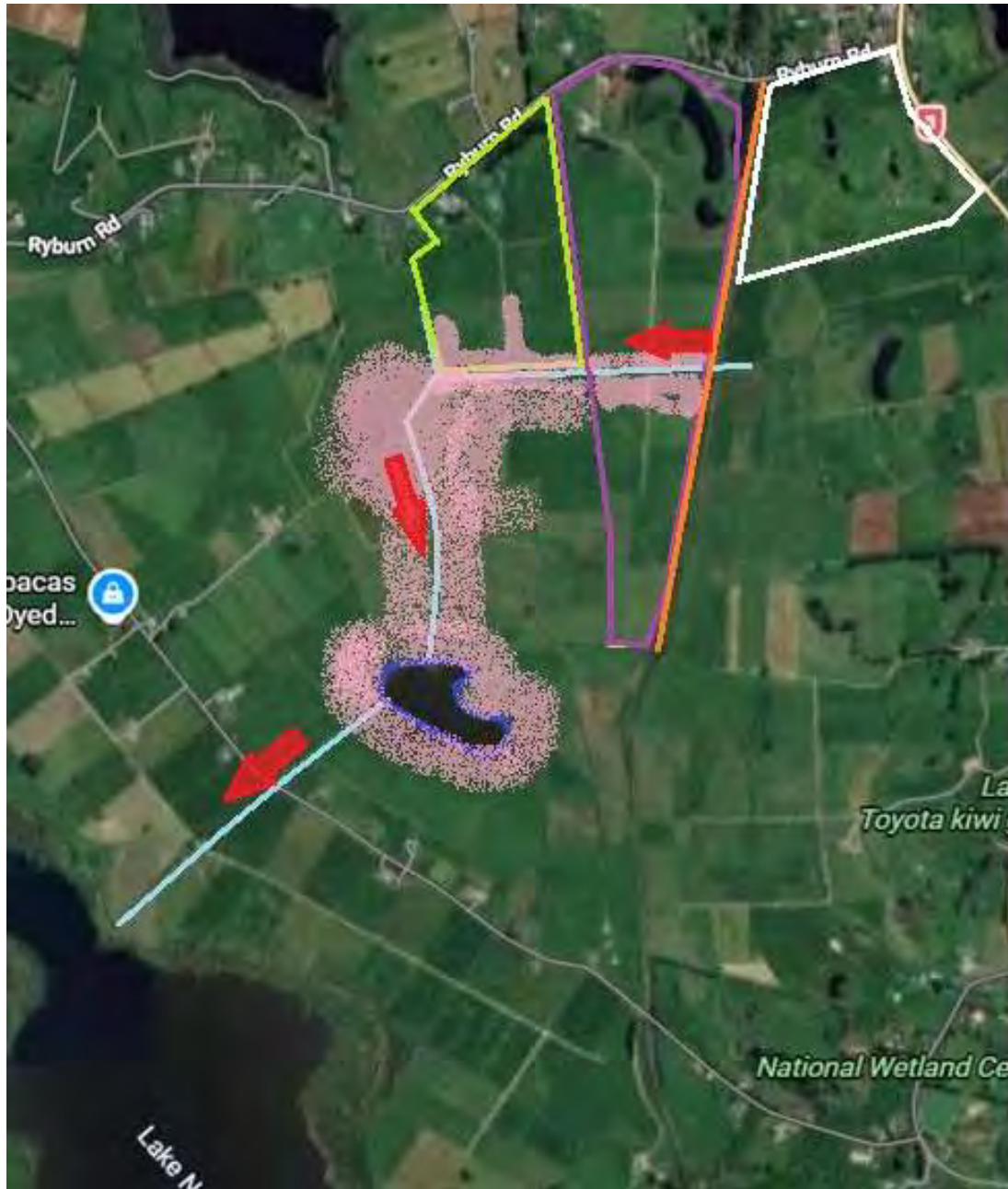
The catchment is characterised by peat soils and a naturally high water table. While peat soils can retain large volumes of water, once saturated they have little remaining capacity to absorb additional rainfall. As a result, water tables frequently remain close to the ground surface throughout winter and during prolonged wet weather, causing rainfall to rapidly become surface runoff rather than infiltrating into the soil.

The drainage network already experiences periods where water backs up through the system, resulting in flooding across surrounding farmland. During larger rainfall events, the wider catchment becomes inundated, and floodwaters continue moving through the drainage network towards Lake Ngaroto. These flooding events demonstrate that the drainage system is already under considerable pressure before any additional development occurs.

Our observations are based on years of managing livestock and farming within this catchment through all seasons. We regularly observe where floodwaters first emerge, how long water remains on paddocks, how the drains respond during rainfall events, and the practical impacts that flooding has on farming operations, pasture production, animal welfare and infrastructure.



Farm Catchment



KEY:

- Purple - Our Farm
- Green – Our Lease
- Light Blue – Drainage serving the subdivision
- Orange – Train Tracks
- Pink – Areas of ground that are flooded

Existing Flooding and Drainage Issues

Flooding is a regular and well-established characteristic of this catchment. Since taking over the day-to-day management of the farm, we have experienced some degree of flooding every winter. While the severity varies depending on rainfall intensity, duration and the condition of the wider catchment, seasonal flooding has become an accepted part of farming this land.

As the contract milkers responsible for managing both the downstream dairy platform and the nearby leased support block, we have developed a detailed understanding of how water moves through the drainage network during both ordinary rainfall and significant storm events. These observations have been made over several years while carrying out normal farming operations and managing livestock throughout all seasons.

The existing drainage network already operates under significant pressure during sustained rainfall. Water levels within the drains rise rapidly and, once the system reaches capacity, water backs up through the drainage network and spreads across paddocks. In many locations floodwater remains for extended periods before the drainage system is able to recover.

Because the catchment consists predominantly of peat soils with a naturally high groundwater table, it does not require extreme rainfall to produce flooding. During winter and prolonged wet periods the soils are already saturated, leaving very little capacity to absorb additional rainfall. As a result, even moderate rainfall events can produce surface ponding and inundation. Larger rainfall events result in widespread flooding throughout the catchment.

Our experience demonstrates that the drainage network functions as one interconnected system. Water entering the network upstream ultimately affects downstream properties. Consequently, any increase in stormwater entering the system has the potential to increase flood depths, extend the duration of flooding or increase the frequency of flooding experienced downstream.

Although flooding has occurred every winter throughout our management of the property, it is only in the past few years that we have begun systematically photographing flood events. This has largely been prompted by the proposed development and our concern that decisions regarding future stormwater management should be based on documented evidence of the existing drainage constraints.

The absence of photographs from earlier years should not be interpreted as an absence of flooding. Rather, flooding has long been regarded as part of farming within this catchment and, until recently, there was little reason to formally document what had become an expected seasonal occurrence.

The photographs accompanying this submission therefore represent only a portion of the flooding events experienced over many years. They demonstrate recurring patterns

of inundation across multiple seasons and provide visual confirmation that flooding is an ongoing characteristic of the catchment rather than an isolated or exceptional event.

During larger rainfall events the entire catchment becomes overwhelmed. Water continues moving through the drainage network toward Little Ngaroto and ultimately Lake Ngaroto. During these events, floodwaters are capable of transporting aquatic species such as koi carp into farm drains and across flooded paddocks, creating additional environmental and farming impacts that are discussed later in this submission.

While appropriate maintenance of both farm drains and board drains is important, our observations indicate that the flooding experienced within this catchment cannot be attributed solely to the condition of individual drains. Instead, it reflects the combined effects of peat soils, a naturally high groundwater table, the limitations of the wider drainage network, and the cumulative volume of water moving through the catchment during wet periods.

For these reasons, we are concerned that introducing additional stormwater from a large residential development—even where attenuation measures are proposed—has the potential to place further pressure on an already constrained drainage system unless it can be clearly demonstrated that there will be no increase in downstream flooding.

Historical Flooding Record

Flooding within this catchment has been a recurring feature for many years. The following table provides a summary of our observations and the evidence available. It should be noted that earlier flooding events were not routinely photographed because they were considered part of the normal realities of farming in this area.

Time Period	Observation
Every winter since managing the farm	Seasonal flooding affecting the dairy platform, leased support block and surrounding land. The severity varies depending on rainfall, but some degree of flooding occurs each winter.
Prior to 2024	Flooding was generally accepted as part of farming within this catchment and was not routinely photographed or documented.
2017	Earliest photographs available showing flooding within the drainage network and surrounding paddocks.
2024–2025	Increased documentation of flood events began due to concerns regarding the proposed subdivision and the need to record existing drainage conditions.
January 2025	Significant flooding occurred throughout the board drain network and downstream paddocks. Photographs demonstrate extensive inundation across affected land.
2025–2026	Further flood events documented across both the dairy platform and leased support block, showing recurring patterns of inundation and prolonged surface water.
Major catchment overflow events	Floodwaters continue through the drainage network toward Little Ngaroto and Lake Ngaroto. During these events, koi carp have entered farm drains and flooded paddocks, demonstrating the connectivity of the wider catchment.

Peat Soils and High Groundwater

The catchment surrounding the proposed development is predominantly underlain by peat soils. These soils behave very differently from the mineral soils found in many other parts of the Waikato and require careful consideration when assessing the potential impacts of additional stormwater entering the drainage network.

Peat soils are formed from partially decomposed organic material that has accumulated over thousands of years in permanently or seasonally waterlogged environments. As a result, they are naturally associated with a high groundwater table and rely on artificial drainage systems to make the land suitable for agricultural use.

Although peat soils are capable of storing significant volumes of water, this storage capacity is only available while the soil profile has space to absorb additional rainfall. During winter and prolonged wet periods, the peat becomes saturated and the groundwater table rises close to the ground surface. Once this occurs, there is little remaining capacity for infiltration, and further rainfall quickly becomes surface runoff entering the drainage network.

This reflects our experience managing the farm. Throughout winter the ground often remains consistently damp, even during periods without rainfall. Following rainfall events, water levels rise quickly in the drains and surface ponding develops across low-lying paddocks. These conditions occur because the land is already carrying a high level of moisture before additional rain falls.

Unlike catchments with freely draining soils, this catchment has a limited ability to absorb increases in stormwater volumes during saturated conditions. Consequently, the performance of the drainage network becomes increasingly important in managing flood risk.

The proposed development would replace permeable rural land with a substantial area of roofs, roads, driveways and other hard surfaces. Even where stormwater attenuation measures are proposed, a greater proportion of rainfall will enter the drainage system more rapidly than occurs under existing land use.

This is of particular concern in a peat catchment where downstream drainage capacity is already constrained. Any increase in runoff volume, peak discharge or the duration of discharge has the potential to place additional pressure on a drainage network that already experiences seasonal flooding.

Given these characteristics, we believe it is essential that any assessment of stormwater effects fully considers the cumulative impacts of development within a peat catchment rather than relying solely on theoretical attenuation calculations. Hydraulic modelling should demonstrate not only compliance at the point of discharge but also that downstream properties will experience no increase in flood frequency, flood depth or flood duration.

The unique characteristics of peat soils also reinforce the importance of applying a precautionary approach. Once flooding impacts occur downstream, they cannot easily be reversed and may result in long-term consequences for agricultural productivity, infrastructure, animal welfare and environmental values.

Key Point

The concern is not simply the amount of rainfall that falls on the proposed subdivision. The concern is that the subdivision will discharge additional stormwater into an already saturated peat catchment where drainage capacity is limited, increasing the risk of downstream flooding on existing rural properties.

Agricultural Impacts of Existing and Potential Increased Flooding

Our primary concern is not simply that flooding occurs, but the practical consequences flooding has on the operation of a working dairy farm and the welfare of the animals under our care.

As contract milkers, we are responsible for the day-to-day management of approximately 200 dairy cows, replacement stock and the surrounding farming operation. Our responsibilities include pasture management, animal health, milk production, environmental compliance and ensuring the ongoing productivity of the farm.

Flooding directly affects each of these responsibilities.

Loss of Productive Pasture

When paddocks become inundated, pasture is unable to be grazed until floodwaters have receded and soil conditions have recovered sufficiently to avoid excessive pugging.

This reduces the amount of usable pasture available for grazing and places additional pressure on the remainder of the farm. During winter, when pasture growth is already limited, the loss of grazing area can have significant consequences for feed management.

Extended periods of saturation can also reduce pasture persistence, requiring costly re-grassing and pasture renewal.

Soil Damage and Pugging

Wet peat soils are particularly vulnerable to pugging by livestock.

Where animals are required to graze saturated paddocks, hoof damage destroys soil structure, reduces pasture production and increases the time required for paddocks to recover.

Even after floodwaters have receded, paddocks often remain unsuitable for grazing for an extended period due to the risk of further soil damage.

This can create ongoing impacts well beyond the flood event itself.

Animal Welfare

Flooding presents genuine animal welfare challenges.

Livestock naturally avoid standing in water for prolonged periods and require access to dry areas for lying, feeding and resting.

Where flooding reduces the number of suitable paddocks, stock movements become more difficult and management options become increasingly limited.

As the people responsible for the daily welfare of the herd, we must continually adapt grazing plans during wet periods to minimise animal stress and protect both livestock and pasture.

Animal Health

Prolonged wet conditions increase the risk of several animal health issues.

These include:

- Mastitis resulting from muddy and wet conditions.
- Lameness caused by prolonged exposure to saturated ground.
- Increased bacterial contamination around gateways and races.
- Greater stress on animals due to repeated movements between limited dry areas.

Maintaining animal health during wet periods requires significantly greater labour and management input.

Farm Operations

Flooding affects almost every aspect of day-to-day farm management.

It can:

- Restrict access to paddocks.
- Delay stock movements.
- Reduce flexibility when managing calving.
- Limit where supplements can be fed.
- Increase machinery access issues.
- Extend the amount of time required for routine farm tasks.

These operational impacts occur even where floodwaters are relatively shallow.

Financial Impacts

The cumulative impacts of repeated flooding include:

- Reduced pasture utilisation.
- Increased pasture renewal costs.
- Higher supplementary feed requirements.
- Additional labour.
- Reduced operational efficiency.
- Increased animal health costs.
- Potential reductions in milk production.

While each individual flooding event may appear manageable, the cumulative effect over multiple winters places a significant financial burden on both ourselves as contract milkers and the farm owners.

Existing Challenges Should Not Be Increased

We fully acknowledge that flooding has long been a feature of farming within this catchment and accept that some seasonal flooding is part of operating on peat soils.

However, that existing situation should not be used as justification for introducing additional stormwater into an already constrained drainage network.

The fact that flooding already occurs makes it even more important that any new development demonstrates it will not increase flood frequency, flood depth, flood duration or the operational impacts experienced by downstream landowners.

In our view, the objective should not simply be to avoid creating a "significant" increase in flooding. Rather, development should demonstrate that it will not make an already challenging situation any worse.

As the people responsible for managing this farm every day, we experience the effects of the drainage network in a very practical way. Flooding is not an abstract planning issue for us—it affects where our cows can graze, how we manage animal welfare, the condition of our pastures, the time required to complete daily tasks, and ultimately the productivity and viability of the farming operation. Our concerns are based on years of firsthand experience living and working within this catchment.

Biosecurity and Environmental Effects

The flooding experienced within this catchment has environmental impacts beyond the inundation of farmland. One of the clearest demonstrations of the connectivity of the drainage network is the movement of aquatic species during major flood events.

During periods when the wider catchment becomes inundated, floodwaters moving through the drainage system have carried koi carp into farm drains and flooded paddocks on our property. This has occurred when water levels become sufficiently high for fish to move throughout the interconnected drainage network.

This observation demonstrates that the drainage network is not functioning as a series of isolated drains. Rather, it operates as one connected hydrological system extending from upstream catchments through agricultural land and ultimately toward Little Ngaroto and Lake Ngaroto.

The presence of koi carp on our farm during flood events is significant for several reasons.

Firstly, it illustrates the extent of flooding that already occurs within the catchment. Water levels become sufficiently high that aquatic species are able to move well beyond permanent waterways and into areas that are normally productive farmland.

Secondly, koi carp are recognised as an invasive pest species that contribute to declining water quality through their feeding behaviour. By disturbing bottom sediments, they increase water turbidity, release nutrients into the water column and reduce water quality within affected waterways.

Although the proposed development is not responsible for the presence of koi carp, any increase in flood frequency, flood extent or the duration of floodwaters has the potential to increase opportunities for pest fish to move through the drainage network and onto agricultural land.

This further illustrates why stormwater management should be considered at the scale of the entire catchment rather than only at the point where stormwater leaves the proposed development.

The environmental values of downstream waterways, wetlands and Lake Ngaroto are closely linked to the way stormwater is managed throughout the catchment. Protecting these environments requires confidence that additional development will not adversely affect the existing hydrological regime.

Catchment Connectivity

One of the strongest pieces of evidence arising from our firsthand observations is that the catchment functions as a single interconnected system.

Floodwater does not remain confined to individual drains or properties. During larger rainfall events, water moves through culverts, board drains, farm drains, paddocks and wetlands before eventually reaching Little Ngaroto and Lake Ngaroto.

The movement of koi carp through this same pathway provides a clear indication of the level of connectivity that exists throughout the drainage network.

For this reason, we consider it essential that the cumulative downstream effects of additional stormwater are assessed across the entire catchment rather than only at the subdivision boundary.

Limitations of the Existing Stormwater Assessment

We acknowledge that the applicant has commissioned professional stormwater assessments to support the proposed development. However, based on our experience managing the downstream land on a daily basis, we are concerned that technical modelling alone may not fully reflect the behaviour of this catchment under real-world conditions.

Stormwater modelling is necessarily based on assumptions, design parameters and selected rainfall events. While these are important tools for assessing potential effects, they should be considered alongside the practical experience of those who live and work within the catchment throughout the year.

Our observations over several years indicate that the drainage network behaves differently once the peat soils become saturated and the groundwater table rises. During these periods, the capacity of the catchment to absorb additional rainfall is significantly reduced, and relatively modest rainfall events can result in flooding.

We are therefore concerned that assessments based primarily on theoretical storage volumes or modelled discharge rates may not fully capture the cumulative effects experienced by downstream landowners during prolonged wet periods.

Existing Drainage Constraints

The existing drainage network is already required to manage runoff from a large rural catchment.

Throughout our time managing the farm we have observed:

- seasonal flooding occurring every winter;
- drains reaching capacity during sustained rainfall;
- water backing up through the drainage network;
- prolonged inundation of paddocks;
- floodwaters moving throughout the wider catchment toward Little Ngaroto and Lake Ngaroto.

These observations indicate that the drainage system is already operating under considerable pressure during wet conditions.

Accordingly, the relevant question is not simply whether the proposed development complies with current stormwater design standards. It is whether the development can genuinely demonstrate that downstream flooding will not become more frequent, deeper or longer in duration.

Cumulative Effects

We are particularly concerned about cumulative effects.

While the increase in runoff generated by a single development may appear acceptable when considered in isolation, downstream landowners experience the combined effect of every discharge entering the drainage network.

As water moves through the catchment it accumulates from multiple sources before reaching downstream properties.

For those of us farming at the receiving end of the system, the cumulative effect is what determines whether paddocks remain usable, drains remain within capacity, and livestock can continue to be managed safely.

For this reason, we consider it essential that downstream cumulative effects are fully assessed rather than relying solely on compliance at the point of discharge.

Peat Catchment Behaviour

Particular consideration should also be given to the behaviour of peat catchments.

Unlike freely draining mineral soils, saturated peat has limited remaining storage capacity during winter.

Consequently, attenuation systems that perform well under average conditions may behave differently once the wider catchment is already saturated.

We therefore consider it important that stormwater modelling reflects prolonged winter saturation, elevated groundwater levels and existing downstream drainage limitations rather than considering only isolated design storm events.

Practical Knowledge

As the people responsible for managing this farm every day, we observe how the drainage system behaves under a wide range of weather conditions.

Our observations include:

- where flooding first develops;
- which paddocks are consistently affected;
- how long floodwaters remain;
- how quickly drains respond;
- where water backs up through the drainage network;
- the practical consequences for farming operations and livestock.

While this knowledge is observational rather than technical, it represents years of direct experience and should be considered alongside engineering assessments when evaluating the potential effects of the proposal.

Precautionary Approach

Given the existing flooding issues within this catchment, we believe a precautionary approach is appropriate.

Where there is uncertainty regarding downstream effects, the burden should rest with the applicant to demonstrate that the proposed development will not increase:

- flood frequency;
- flood depth;
- flood duration;
- pressure on the downstream drainage network; or
- adverse effects on existing rural landowners.

In our view, demonstrating compliance with minimum engineering standards alone is not sufficient where downstream land is already known to experience regular flooding.

We are not suggesting that development should never occur within this catchment.

Rather, we are asking that any development proceeds only where it can be demonstrated, with a high level of confidence, that downstream properties will not experience any worsening of existing flooding or drainage issues. Given the established flooding history of this catchment, we believe this is both a reasonable and necessary expectation.

Downstream Effects on Existing Rural Landowners

As the occupiers and day-to-day managers of the rural property immediately downstream of the proposed subdivision, we are directly affected by the way stormwater is managed within this catchment.

Unlike the proposed development, which is located upstream, our property receives the cumulative effects of water travelling through the drainage network. Any increase in runoff generated by development has the potential to affect those already living and working downstream.

The existing flooding issues described throughout this submission are not hypothetical concerns. They are conditions that we currently manage as part of operating a working dairy farm. We accept that farming on peat soils involves seasonal flooding and naturally wet conditions. However, we do not consider it reasonable that these existing challenges should be increased through additional urban development unless it can be clearly demonstrated that no additional adverse effects will occur.

Our concern is not based on opposition to growth or development. We recognise that Waipā District is growing and that additional housing will be required in the future. However, growth should occur in a way that does not transfer additional environmental or financial costs onto existing downstream landowners.

Where downstream flooding already occurs, the responsibility should rest with the applicant to demonstrate that development will not worsen an existing problem.

Fairness for Existing Landowners

Existing rural landowners have made long-term investments in their properties and farming businesses based on the current characteristics of the catchment.

The proposed development represents a significant change in land use from predominantly rural land to urban residential development.

Where such a change has the potential to alter stormwater behaviour, those who may be adversely affected should not be expected to bear the resulting costs or increased risks.

This includes costs associated with:

- reduced pasture production;
- increased drainage management;
- pasture renewal;
- supplementary feed;
- additional labour;

- animal health impacts;
- infrastructure maintenance; and
- reduced operational flexibility.

We consider it appropriate that these potential effects are fully assessed before consent is granted.

Existing Drainage Does Not Mean Unlimited Capacity

The existence of an established drainage network should not be interpreted as evidence that there is spare capacity available to accommodate additional stormwater.

Our experience demonstrates the opposite.

The drainage system already reaches capacity during seasonal rainfall events, resulting in flooding across downstream farmland.

The fact that a drainage network exists does not mean that additional stormwater can be introduced without consequence.

Any assessment should therefore consider not only the capacity of individual drains and culverts but also the cumulative performance of the entire downstream catchment under saturated winter conditions.

Practical Experience Should Inform Decision-Making

As the people responsible for managing the downstream farm every day, we have practical knowledge that cannot be obtained from desktop modelling alone.

Our observations include:

- the locations where flooding consistently occurs;
- the sequence in which drains fill and overflow;
- the duration of flooding;
- the effect of groundwater levels on drainage performance;
- the movement of floodwater across paddocks; and
- the operational consequences for farming.

We respectfully submit that this local knowledge should be considered alongside engineering assessments when evaluating the potential effects of the proposal.

Avoiding the Transfer of Risk

A key principle of good planning is that development should avoid, remedy or mitigate adverse effects on neighbouring properties.

We are concerned that, without appropriate safeguards, the proposed development could transfer additional flood risk from the development site to existing downstream rural landowners.

We consider it reasonable that any consent granted should include conditions that ensure downstream properties are not placed in a worse position than they are today.

Our submission is not based on speculation. It is based on years of managing the downstream effects of this catchment, observing its behaviour through multiple seasons and flood events, and understanding the practical realities of farming on peat soils.

We are asking that the existing challenges faced by downstream landowners are recognised and that any future development is required to demonstrate that it will not increase those challenges.

Traffic and Road Safety

In addition to our concerns regarding stormwater management, we have significant concerns about the effects of increased traffic generated by the proposed subdivision.

Ryburn Road is a rural road that currently services farming operations, rural residents and agricultural vehicles. It was not originally designed to accommodate the substantial increase in vehicle movements that is likely to result from a large residential development.

As people who use this road every day, often several times a day, we have firsthand knowledge of its characteristics, its limitations and the practical challenges already experienced by road users.

Daily Farm Traffic

Our farming operation requires regular movement of:

- tractors;
- feed wagons;
- fertiliser trucks;
- livestock trucks;
- milk tankers;
- veterinarians;
- contractors;
- machinery transport;
- staff vehicles; and
- stock being moved between our dairy platform and leased support block.

These vehicles are often large, slow moving and require additional space to manoeuvre safely.

Increasing residential traffic has the potential to create more conflicts between agricultural vehicles and general traffic.

Road Characteristics

Ryburn Road has a number of characteristics that already require drivers to exercise caution.

These include:

- narrow carriageway widths in places;
- limited opportunities for overtaking;
- agricultural vehicle movements;
- seasonal mud and debris associated with farming operations;
- varying traffic speeds.

These characteristics are typical of a rural road but may become increasingly problematic if traffic volumes increase significantly.

Safety for Rural Operations

Farm vehicles cannot always accelerate quickly or maintain the same speeds as passenger vehicles.

Many farm operations require machinery to enter and leave paddocks, cross the roadway or travel relatively short distances between properties.

These movements already require careful planning.

A substantial increase in residential traffic would increase the number of interactions between slow-moving agricultural machinery and general traffic, potentially increasing safety risks for all road users.

Children and Vulnerable Road Users

As parents raising children within this community, we are also concerned about the safety of children using the road.

An increase in vehicle numbers inevitably increases exposure to risk for:

- children;
- cyclists;
- pedestrians; and
- others using the rural road environment.

Any traffic assessment should carefully consider these users, not simply vehicle capacity.

Future Traffic Growth

The proposed subdivision represents a long-term change in traffic patterns rather than a temporary increase.

Each new household is likely to generate multiple vehicle movements every day.

Collectively, this represents a substantial increase over existing rural traffic volumes.

Once established, these traffic increases will remain for the lifetime of the subdivision.

Our Observations

Based on our daily use of Ryburn Road we have observed:

- agricultural machinery regularly occupies much of the carriageway;
- milk tankers require careful manoeuvring;
- stock trucks regularly enter and exit farm entrances;
- visibility can be reduced in poor weather;
- traffic speeds are variable;
- drivers unfamiliar with rural roads sometimes underestimate the space required by agricultural vehicles.

These observations reinforce our concern that increased residential traffic should be carefully assessed.

Conclusion

We respectfully request that the Hearing Panel carefully consider whether the existing road network is capable of safely accommodating the expected increase in traffic while continuing to support existing rural land uses.

If consent is granted, we consider that any necessary road improvements should be completed before significant residential occupation occurs.

Effects on a Working Farm Business

Increased traffic will have practical effects on the day-to-day operation of our farming business. Our dairy platform and leased support block operate as one farming unit, requiring regular movement of livestock, tractors, feed wagons and other machinery between properties. As traffic volumes increase, these movements will become slower, more difficult and potentially less safe. Waiting for suitable gaps in traffic reduces operational efficiency and increases the risk associated with moving stock and agricultural vehicles. These are ongoing operational effects that should be recognised alongside the broader traffic impacts of the proposal.

Climate Change and Future Catchment Resilience

When considering the long-term effects of the proposed subdivision, it is important that stormwater management is assessed not only against current conditions but also against the future climate that this development will operate within.

The houses, roads and stormwater infrastructure associated with this development are expected to remain in place for many decades. During that time, rainfall patterns are expected to continue changing, with increasing frequency of intense rainfall events and greater pressure being placed on existing drainage systems.

For downstream landowners, this is a significant concern.

Our farming operation already experiences seasonal flooding under current conditions. The drainage network regularly operates under pressure during prolonged wet periods, particularly when peat soils are saturated and groundwater levels are high.

If rainfall intensity increases over the coming decades, as is widely anticipated, the capacity of the existing drainage network may become increasingly constrained.

This raises an important question:

Can the proposed stormwater system continue to protect downstream properties not only under today's conditions, but throughout the expected life of the development?

Planning for the Life of the Development

The effects of this subdivision will not end once construction is complete.

Future residents will rely on the stormwater system for many decades, and downstream landowners will continue living with the consequences of how effectively that system performs.

For this reason, we believe stormwater management should be designed with sufficient resilience to accommodate future climatic conditions rather than simply achieving compliance under current design assumptions.

Where uncertainty exists, a precautionary approach should be adopted to ensure that downstream flood risk is not progressively increased over time.

Existing Flooding Leaves Little Margin for Error

One of our greatest concerns is that this catchment already experiences flooding under the current climate.

Because flooding is already occurring, there is very little remaining capacity within the drainage network before additional adverse effects begin to occur.

In other words, the existing system does not appear to have a substantial safety margin available to absorb additional runoff or increasingly intense rainfall.

This makes it particularly important that future stormwater management is conservative and robust.

Cumulative Effects Over Time

Development within a catchment should not be viewed as a single event.

Over the coming decades there is likely to be further urban growth, additional infrastructure and changing land uses throughout the wider catchment.

Each individual development may appear to have only a minor effect when assessed independently.

However, downstream landowners experience the cumulative impact of all development occurring upstream.

For this reason, we consider it essential that decision-makers recognise the long-term cumulative effects of urbanisation, particularly within a flood-prone peat catchment.

Building Resilient Communities

Supporting growth within Waipā requires confidence that both new and existing communities can coexist without transferring unacceptable risks.

A resilient stormwater system should protect:

- new residents living within the subdivision;
- existing rural landowners downstream;
- agricultural productivity;
- environmental values;
- waterways and wetlands; and
- public infrastructure.

Achieving these outcomes benefits both present and future generations.

Conclusion

We are not asking that future climate change be predicted with certainty.

Rather, we are asking that the uncertainty surrounding future rainfall patterns is recognised when assessing a development that will remain part of this catchment for many decades.

Given the existing flooding issues, peat soils, shallow groundwater and limited downstream drainage capacity, we believe the proposed development should demonstrate a high level of resilience to future climatic conditions before consent is granted.

Observations from Managing the Catchment

The following observations are based on our firsthand experience managing this farming operation on a daily basis over several years. They are not intended to replace technical assessments but to provide practical evidence of how the catchment behaves under real conditions.

Seasonal Flooding

- Some degree of flooding occurs every winter.
- The extent of flooding varies depending on rainfall intensity and the level of saturation already present within the catchment.
- Flooding has become an accepted part of farming this property, although that does not mean additional flooding should be accepted.

Peat Soil Conditions

- The ground often remains wet for extended periods throughout winter, even when there has been little recent rainfall.
- Water tables remain consistently high during wetter months.
- Once the soil becomes saturated, relatively modest rainfall can result in surface ponding.

Drainage Behaviour

- Drains respond quickly to rainfall events.
- During prolonged rainfall, drains rise rapidly and eventually reach capacity.
- Once drains reach capacity, water backs up through the drainage network and spreads across paddocks.
- Even after rainfall has stopped, paddocks often remain flooded while drains continue flowing at capacity.
- Recovery from flood events is often measured in days or weeks rather than hours.

Flooding Patterns

- The same low-lying paddocks tend to flood repeatedly.
- Floodwaters generally follow consistent pathways across the farm.
- The sequence in which different areas flood is relatively predictable based on rainfall and existing catchment conditions.

- Floodwater does not remain confined to drains but spreads across productive farmland during larger events.

Catchment Connectivity

- Water entering the drainage system upstream eventually reaches our property.
- During major rainfall events, floodwaters continue moving through the catchment toward Little Ngaroto and ultimately Lake Ngaroto.
- The movement of water demonstrates that the drainage network functions as one interconnected system rather than a series of isolated drains.

Biosecurity Observations

- During major flood events, koi carp have entered farm drains and flooded paddocks.
- Their presence demonstrates the extent of connectivity throughout the drainage network.
- It also highlights the environmental impacts that occur when the wider catchment becomes inundated.

Farming Impacts

- Grazing plans frequently need to be altered because paddocks become inaccessible.
- Stock movements become more difficult during wet periods.
- Saturated ground limits where animals can safely graze.
- Pasture damage continues well after floodwaters have receded.
- Recovery of affected paddocks often requires significant time before normal grazing can resume.

Changes in Documentation

- Flooding has occurred throughout the time we have managed this farm.
- Earlier flood events were generally accepted as part of farming within this catchment and were not routinely photographed.
- In recent years we have deliberately begun documenting flood events because of increasing concern about the proposed development and the need to demonstrate the existing condition of the catchment.

Summary

Taken individually, many of these observations may appear to be routine challenges associated with farming on peat soils.

However, when considered together, they paint a consistent picture of a catchment that already operates under significant hydraulic pressure during wetter periods.

Our observations support the conclusion that the downstream drainage network has limited capacity to accommodate additional stormwater without increasing the risk of adverse effects on existing rural landowners.

Why We Are Making This Submission

We wish to make it clear that this submission is not made in opposition to growth or development within Waipā District.

We recognise that the district continues to grow and that additional housing will be required to meet the needs of current and future residents. We also appreciate that well-planned urban development can provide significant benefits to the wider community.

Our concern is not with the principle of development itself.

Our concern is ensuring that development occurs in a way that does not unintentionally transfer increased flood risk, environmental impacts or financial costs onto existing downstream landowners.

As the people responsible for managing the downstream dairy farming operation every day, we experience the practical consequences of how this catchment functions. Flooding is not simply an engineering concept or a planning matter for us. It influences where our cows can graze, how we manage animal welfare, when paddocks can be used, how much pasture is available, and ultimately the productivity of the farming business.

Throughout this submission we have described our firsthand observations of the catchment, supported by photographs and evidence collected over several years. These observations are consistent with what we experience every winter and demonstrate that the drainage network already operates under significant pressure during wet periods.

We acknowledge that professional engineering assessments have been prepared for the proposed development. However, we respectfully submit that these technical assessments should be considered alongside the practical knowledge of those who live and work within the catchment every day.

Good planning is achieved when technical expertise and local experience are both recognised and considered.

We are not asking the Hearing Panel to eliminate all flooding.

We are not asking that farming interests take precedence over housing.

We are asking that the existing realities of this catchment are properly recognised, and that any development is required to demonstrate that it will not make an already constrained drainage system perform worse for those downstream.

We believe this is a reasonable expectation.

Relief Sought

For the reasons outlined in this submission, we respectfully request that the Hearing Panel either decline the proposal in its current form or, if consent is granted, impose conditions that ensure downstream landowners and the wider catchment are not adversely affected.

Specifically, we seek that:

Stormwater

1. Independent peer review of all stormwater and hydraulic modelling by an appropriately qualified expert not engaged by the applicant.
2. Assessment of cumulative downstream effects across the entire catchment, including our dairy platform, lease block, neighbouring farmland, Little Ngaroto and Lake Ngaroto.
3. Demonstration that the proposed development will not increase:
 - flood frequency;
 - flood depth;
 - flood duration;
 - downstream flow velocities; or
 - adverse effects on downstream landowners.
4. Stormwater infrastructure designed to remain effective under future climate conditions, including increased rainfall intensity.

Construction

5. Appropriate erosion and sediment controls throughout construction to prevent sediment entering downstream drains and waterways.
6. Ongoing monitoring of stormwater infrastructure during construction and following completion.

Monitoring

7. A programme of post-development monitoring to confirm that the subdivision performs as predicted and does not create downstream flooding effects.
8. A mechanism requiring remedial action if monitoring identifies increased downstream flooding attributable to the development.

Environmental Protection

9. Protection of downstream waterways, wetlands and ecological values, including consideration of biosecurity impacts associated with increased flood connectivity.

Rural Landowners

10. Recognition of the interests of existing downstream rural landowners when assessing future stormwater performance.
11. Ongoing consultation with affected downstream landowners should significant changes to stormwater management be proposed.

General

12. Any other conditions the Hearing Panel considers necessary to ensure that the effects of the proposed subdivision are avoided, remedied or appropriately mitigated.

Final Statement

We appreciate the opportunity to present our submission.

Our comments are based on years of living and working within this catchment, managing its effects through every season and experiencing firsthand the practical consequences of flooding on a working dairy farm.

We respectfully request that the Hearing Panel adopts a precautionary approach.

Where uncertainty exists regarding downstream effects, the burden should remain on the applicant to demonstrate that existing downstream landowners will be no worse off. Until that can be demonstrated, we respectfully submit that Private Plan Change 36 should not proceed in its current form.

Thank you for considering our submission.

Photographic Evidence - Ryburn Road Submission

Figure 1



Figure 2



Figure 3



Figure 4



Figure 6



Figure 7



Figure 8



Figure 9



Figure 10



Figure 11



Figure 12



Figure 13



Figure 14



Figure 15



Figure 16



Figure 17



Figure 18



Figure 19



Figure 20



Figure 21



Figure 22



Figure 23



Figure 24

