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1. Submitter details

Full name of submitter:	Monie Farms Limited.
Contact name if different from above:	
Contact phone number(s)	
Email address:	
Address for service: (required if no email address is provided)	

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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

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4. Attendance at Council hearing

Select one	☒ I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
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Submission to Waipā District Council

Plan Change 36 – Proposed Residential Development at Ryburn Road, Ōhaupō

Downstream Flooding, Stormwater Management and Effects on Existing Rural Production

Prepared by

Monie Farms Ltd

Owners and Operators of Two Dairy Farms within the Lake Ngarotoiti Catchment

Executive Summary

Monie Farms Ltd respectfully submits this submission in relation to the proposed residential subdivision at Ryburn Road, Ōhaupō.

We own and operate two adjoining dairy farms located immediately downstream of the proposed development, west of the railway corridor, within the natural drainage catchment that flows toward Lake Ngarotoiti. Our farming operation supports approximately 500 dairy cows and has experienced regular flooding for many years as floodwater moves through our properties before discharging into the lake.

Flooding occurs between one and three times each year during significant rainfall events. Typical flood depths are around 500 mm, while major events can exceed one metre. During the significant flood event of 6 April 2017, approximately 26 paddocks were inundated. Since then, we have purchased the adjoining dairy farm, increasing the area potentially affected by flooding by approximately 15 additional paddocks.

We have reviewed the applicant's Request for Further Information (RFI) response and supporting technical reports. While we acknowledge the work undertaken by the applicant's consultants and their conclusion that downstream effects will be "negligible", we remain concerned that the information currently available does not provide sufficient confidence that existing downstream rural properties will not experience increased flooding, prolonged ponding, increased stormwater discharge or adverse water quality effects.

In particular, we consider further information is required regarding:

- downstream effects on rural properties west of the railway corridor;
- validation of flood modelling against historic flood events;
- flood duration and drainage recovery;
- stormwater quality effects on agricultural land; and
- cumulative effects within the wider Lake Ngarotoiti catchment.

Our submission is not intended to prevent appropriate development. Rather, it seeks to ensure that future growth occurs in a manner that protects existing rural businesses, respects the natural behaviour of the Lake Ngarotoiti catchment, and does not transfer additional flood or stormwater risks onto downstream landowners.

We also encourage Waipā District Council to consider whether this proposal presents an opportunity to investigate long-term catchment-wide flood management improvements, including a potential flood bypass around the northern side of Lake Ngarotoiti to improve drainage throughout the wider catchment.

Accordingly, Monie Farms Ltd respectfully requests that Council require further investigation of downstream effects before being satisfied that the proposal will not adversely affect existing rural properties.

Introduction

This submission is made by Monie Farms Ltd, the owners and operators of two adjoining dairy farms situated immediately downstream of the proposed Plan Change 36 development area.

Our farms are located west of the railway corridor within the natural drainage pathway that conveys floodwater through the catchment toward Lake Ngarotoiti. Our family has farmed this land for over 100 years and, through generations of practical farming experience, we have developed a detailed understanding of how floodwater behaves during both ordinary rainfall events and major storms.

The observations contained within this submission are based on two equally important sources of information:

- our firsthand experience of managing repeated flood events over many years; and
- our review of the technical information supplied by the applicant.

We respectfully ask that our local knowledge be considered alongside the applicant's technical assessments.

We recognise that Waipā District is growing and that additional housing will be required to accommodate future population growth. Monie Farms Ltd is not opposed to responsible residential development where it can be demonstrated that it is appropriately located, supported by suitable infrastructure, and does not create adverse effects on existing landowners or the wider environment.

Our concern is not with growth itself. Our concern is ensuring that future urban development does not increase flooding, stormwater discharge, flood duration or contamination risks for downstream rural properties that already experience significant flooding.

Where uncertainty exists regarding downstream effects, we believe additional assessment should be undertaken before decisions are made.

Our Farming Operation and Existing Flooding

Monie Farms Ltd operates two adjoining dairy farms within the Lake Ngarotoiti catchment, supporting approximately 500 dairy cows and contributing to the local economy through productive rural land use.

Our properties lie immediately downstream of the proposed subdivision, west of the railway corridor, within the natural flood pathway toward Lake Ngarotoiti. This location means our farms are directly affected by how stormwater and floodwater move through the catchment.

Flooding is an existing and recurring issue. Significant rainfall events occur one to three times each year, with typical flood depths of around 500 mm and major events exceeding one metre. While flood depth is important, our experience is that flood duration is often the more significant issue. The longer water remains on productive pasture, the greater the impact on pasture recovery, grazing rotations, stock management and the overall productivity of the farm.

The flood event of 6 April 2017 demonstrated the scale of flooding that can occur within this catchment. Approximately 26 paddocks were inundated across our farming operation. Since that event we have purchased the adjoining dairy farm, increasing the area potentially affected by flooding by approximately 15 additional paddocks.

Video evidence submitted with this submission was recorded during the 6 April 2017 flood event downstream of the proposed subdivision before floodwater reached Lake Ngarotoiti. The footage demonstrates the existing flood pathway, extensive inundation across productive farmland and the scale of flooding already experienced within the catchment. We respectfully submit that this observed evidence should be considered alongside the applicant's hydraulic modelling.

Our experience over many years has shown that relatively small changes in flood behaviour can have significant practical consequences for a working dairy farm. Even modest increases in flood duration or slower drainage can delay grazing, reduce pasture productivity, increase rehabilitation costs and disrupt normal farm operations.

Existing flooding already results in the loss of productive grazing land, damage to pasture, disruption to stock management, damage to fences, races and drainage infrastructure, reduced farm access and ongoing financial impacts. For this reason, any proposal that may alter stormwater runoff or drainage performance should demonstrate, with a high degree of confidence, that downstream landowners will experience no additional adverse effects.

Review of the Applicant's Technical Assessment

Monie Farms Ltd has carefully reviewed the Request for Further Information (RFI) response and the technical reports prepared in support of the proposed subdivision.

We acknowledge the work undertaken by the applicant's planning, engineering and environmental consultants and recognise that hydraulic modelling is an important tool for assessing flood behaviour.

However, while the reports conclude that the proposed development will have "negligible" effects beyond the site boundary, we remain concerned that the information currently available does not provide sufficient confidence that downstream rural properties will experience no adverse effects.

Our concerns extend beyond flood depth alone and include flood duration, drainage recovery, stormwater quality, agricultural impacts and the long-term performance of the wider catchment.

Hydraulic Modelling and Historic Flood Evidence

Hydraulic modelling is based on assumptions, inputs and design scenarios and should be considered alongside observed flood behaviour.

Our flood photographs and the video recorded during the 6 April 2017 flood provide direct evidence of how water moves through the downstream catchment. We have not identified information demonstrating how the applicant's modelling has been calibrated or validated against historic flood events experienced on downstream rural properties such as ours.

Given the existing flood risk within this catchment, we believe this would provide important reassurance regarding the reliability of the modelling.

Assessment of Downstream Rural Properties

Our principal concern is that the reports do not appear to provide a detailed assessment of existing rural properties located downstream of the development.

In particular, we have not identified specific assessment of:

- dairy farms west of the railway corridor;
- productive rural land within the downstream flood pathway;
- practical effects on farming operations; or
- cumulative effects further toward Lake Ngarotoiti.

Given the location of our farms within the natural downstream flow path, we believe these matters warrant further investigation.

Flood Duration and Agricultural Effects

While considerable attention has been given to predicted flood levels, we have not identified the same level of assessment regarding flood duration and drainage recovery.

For a dairy farming operation, the time taken for water to leave productive pasture is often more significant than the maximum flood depth.

We therefore respectfully request further assessment of:

- drainage recovery following significant rainfall;
- duration of ponding on downstream farmland;
- cumulative changes in inundation time; and
- the time required for productive land to return to normal use.

Stormwater Quality and Existing Rural Production

Our concerns also extend beyond the quantity of stormwater leaving the development.

Residential stormwater has the potential to introduce contaminants including sediment, hydrocarbons, heavy metals, litter, pet waste and bacteria that are not generally associated with rural runoff.

As downstream dairy farmers, we are concerned about the potential effects on:

- pasture quality;
- stock health;
- farm drainage systems;
- environmental compliance; and
- the long-term productivity of our farming operation.

While we acknowledge that stormwater treatment systems are proposed, we respectfully request confidence that these systems will continue to protect downstream agricultural land under both normal and significant rainfall events.

Summary of Our Review

We acknowledge the significant technical work undertaken by the applicant.

However, we consider that further information would assist Council and affected landowners in understanding the proposal's potential downstream effects.

In particular, we believe additional assessment is required regarding:

- downstream property-specific effects;
- flood duration and drainage recovery;
- cumulative catchment effects;
- stormwater quality;
- impacts on productive rural land; and
- the interaction between future urban development and the existing downstream drainage network.

Our intention is not to challenge the expertise of the applicant's consultants, but to ensure Council has sufficient information to make a fully informed decision.

Stormwater, Catchment Management and Regional Drainage

While flooding is our primary concern, we are equally concerned about the long-term quality and management of stormwater entering the downstream catchment.

Residential development introduces roads, roofs, driveways and other impervious surfaces that have the potential to carry contaminants including sediment, hydrocarbons, heavy metals, bacteria and pet waste.

Given the location of our farms immediately downstream, we respectfully request that Council be satisfied these effects have been appropriately assessed for existing dairy farming operations.

We are also concerned about the cumulative effects of future urban development within the wider catchment.

While each individual development may conclude that its effects are relatively small, the combined increase in impervious surfaces and stormwater runoff has the potential to place increasing pressure on an already constrained downstream drainage system.

For this reason, we encourage Council to assess this proposal within the context of the wider Lake Ngarotoiti catchment rather than in isolation.

We also note Waikato Regional Council's published objectives for rural drainage schemes, which recognise the importance of removing ponded water from productive pasture within an appropriate level of service to minimise damage to farmland.

From our experience, floodwater already remains on our properties for extended periods following significant rainfall.

Accordingly, we respectfully ask Council to consider whether:

- the existing downstream drainage network has sufficient capacity for future urban development;
- post-development stormwater may increase flood duration on downstream farmland;
- cumulative urban growth has been adequately considered; and
- existing drainage infrastructure will continue to perform as intended.

Floodwater does not recognise property boundaries. Water moves through the catchment as one connected system.

For this reason, we believe future development should be assessed within the context of the wider catchment, ensuring existing landowners, future residents and environmental values are all protected.

Economic Effects on Monie Farms Ltd

Flooding already has significant operational and financial consequences for our farming business.

Existing impacts include:

- loss of productive grazing land;
- reduced pasture growth and feed availability;
- pasture rehabilitation costs;
- disruption to grazing rotations;
- stock management difficulties;
- damage to fences, races and drainage infrastructure;
- reduced farm access;
- increased labour requirements; and
- reduced business resilience during prolonged wet periods.

Since purchasing the adjoining farm, approximately 15 additional paddocks are now exposed to downstream flooding.

Any increase in flood levels, flood duration, stormwater discharge or deterioration in water quality has the potential to increase these impacts.

Protecting existing productive rural businesses should therefore be an important consideration when assessing future development within this catchment.

Relief Sought

Monie Farms Ltd respectfully requests that Waipā District Council:

1. Give careful consideration to the evidence provided by downstream landowners regarding existing flooding within the Lake Ngarotoiti catchment.
2. Require the applicant to provide additional information demonstrating the effects of the proposed subdivision on downstream rural properties located west of the railway corridor.
3. Require further assessment of:
 4. downstream flood levels;
 5. flood duration and drainage recovery;
 6. peak stormwater discharge;
 7. cumulative catchment effects; and
 8. stormwater quality and potential impacts on productive rural land.
9. Obtain, or require, an independent peer review of the applicant's flood modelling and stormwater assessment.
10. Consider the potential effects of residential stormwater on downstream agricultural land, dairy farming operations, stock health and environmental management.
11. Ensure that any approval includes appropriate conditions confirming there will be no increase in downstream flooding, flood duration, stormwater discharge or adverse water quality effects affecting existing rural properties.
12. Give appropriate weight to the practical experience, flood evidence and local knowledge provided by Monie Farms Ltd alongside the applicant's technical assessments.
13. Allow Monie Farms Ltd the opportunity to be heard in support of this submission.

Additional Relief Sought – Long-Term Catchment Management

In addition to the matters outlined above, Monie Farms Ltd respectfully requests that Council consider whether this proposal presents an opportunity to investigate long-term flood management improvements across the wider Lake Ngarotoiti catchment.

From our experience farming within this catchment for generations, we believe the flooding issues experienced downstream are not solely the result of individual properties or developments. Rather, they

reflect the way floodwater moves through the wider catchment and the limited ability of the existing drainage system to efficiently convey water during significant rainfall events.

As a result, floodwater ponds across productive farmland before eventually passing through Lake Ngarotoiti.

We respectfully suggest that Council investigate whether a broader catchment solution could provide long-term benefits for both existing landowners and future development.

One possible option that warrants further investigation is the creation of a flood bypass or relief channel around the northern side of Lake Ngarotoiti, allowing floodwater to bypass the lake before reconnecting with the existing outlet drain.

We acknowledge that such a proposal extends beyond the immediate scope of Plan Change 36 and would require detailed engineering investigations, environmental assessment, consultation with affected landowners, engagement with mana whenua and the involvement of Waikato Regional Council.

Nevertheless, we believe it is an idea worthy of investigation because it has the potential to:

- reduce prolonged ponding on productive farmland;
- improve drainage efficiency throughout the catchment;
- increase resilience during significant storm events;
- reduce pressure on existing downstream properties; and
- provide long-term environmental, economic and community benefits.

While we recognise this proposal cannot be resolved through this subdivision alone, we believe the current application provides an opportunity to begin considering broader catchment management solutions rather than continuing to assess future developments in isolation.

Monie Farms Ltd wishes to make it clear that we are **not opposed to appropriate development**.

Should Council and the applicant demonstrate, through robust evidence, that the proposed subdivision will result in **no increase in downstream flooding, flood duration, stormwater discharge or adverse water quality effects**, and should meaningful investigation be undertaken into long-term catchment flood management opportunities, including the potential bypass discussed above, we would welcome the opportunity to continue working constructively with Council, the applicant, Waikato Regional Council, mana whenua and other stakeholders toward an outcome that benefits both existing landowners and future residents.

However, until those matters have been satisfactorily addressed, we continue to have genuine concerns regarding the potential effects of the proposed development on our farming operation and the wider Lake Ngarotoiti catchment.

Conclusion

Monie Farms Ltd recognises that Waipā District is growing and that additional housing will be required to meet the needs of future generations.

We support responsible and well-planned development where it can be demonstrated that existing communities, productive rural land and the natural environment will not be adversely affected.

Our submission is not intended to prevent development. Rather, it seeks to ensure that future growth occurs in a way that recognises the existing characteristics of the Lake Ngarotoiti catchment and protects those who already live and work within it.

Our observations are based on generations of practical farming experience, supported by documented flood events, photographs, video evidence and our review of the applicant's technical information.

While we acknowledge the work undertaken by the applicant's consultants, we respectfully consider that further information is required before Council can be satisfied that downstream rural properties will experience no additional adverse effects.

We believe this proposal presents an opportunity not only to assess the effects of one subdivision, but also to strengthen the long-term resilience of the entire Lake Ngarotoiti catchment.

Good planning should enable communities to grow while ensuring that existing landowners are not left carrying unintended downstream consequences.

Final Statement

Monie Farms Ltd respectfully submits that this proposal should not be viewed solely as a decision about one subdivision. Rather, it is an opportunity to consider how future urban growth can occur alongside existing productive rural land in a way that is sustainable, resilient and fair to all affected landowners.

Our submission is made respectfully and in good faith. It is not intended to oppose appropriate development, but to ensure that future growth is supported by robust evidence, sound stormwater management and a clear understanding of the downstream effects on existing landowners and farming businesses.

We remain committed to working constructively with Waipā District Council, the applicant, Waikato Regional Council, mana whenua and other stakeholders to achieve an outcome that balances the need for future housing with the protection of existing rural businesses, productive farmland and the wider Lake Ngarotoiti catchment.

We believe this proposal also presents an opportunity to investigate longer-term catchment management solutions, including the potential for a flood bypass around the northern side of Lake Ngarotoiti. While we recognise that such a solution extends beyond the scope of this application, we believe it has the potential to improve flood resilience throughout the wider catchment and should not be overlooked.

Should Council and the applicant be able to demonstrate through robust evidence that the proposed subdivision will result in **no increase in downstream flooding, flood duration, stormwater discharge or adverse water quality effects**, and should meaningful consideration be given to long-term catchment-wide flood management opportunities, Monie Farms Ltd would welcome the opportunity to continue working constructively with all parties to help achieve that outcome.

However, until those matters have been satisfactorily addressed, and until there is confidence that downstream effects have been fully understood and appropriate long-term mitigation has been considered, Monie Farms Ltd continues to have genuine concerns regarding the potential effects of the proposed development on our farming operation and the wider Lake Ngarotoiti catchment.

We respectfully ask that the evidence, concerns and recommendations outlined in this submission be given careful consideration before any final decision is made on Plan Change 36.

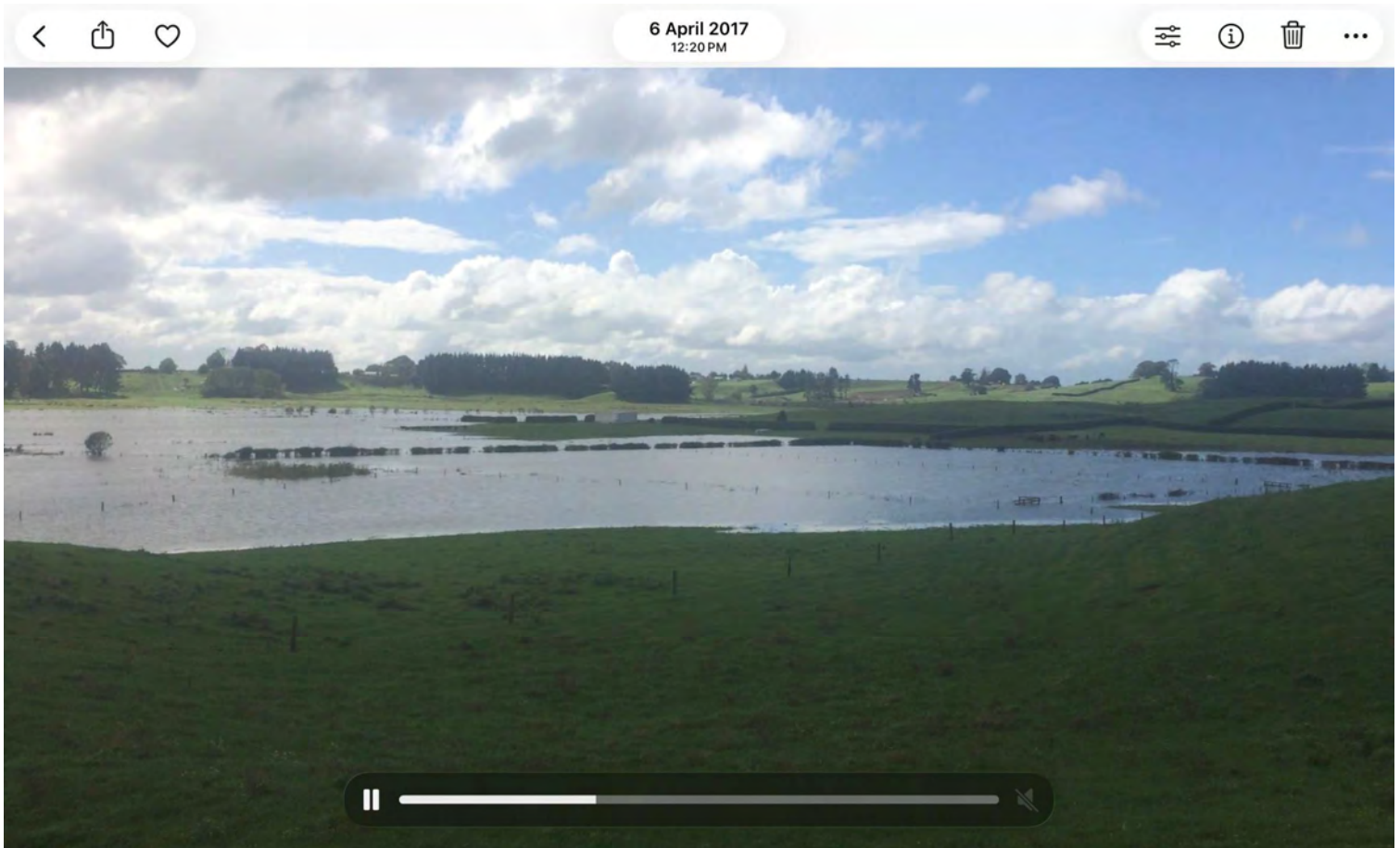
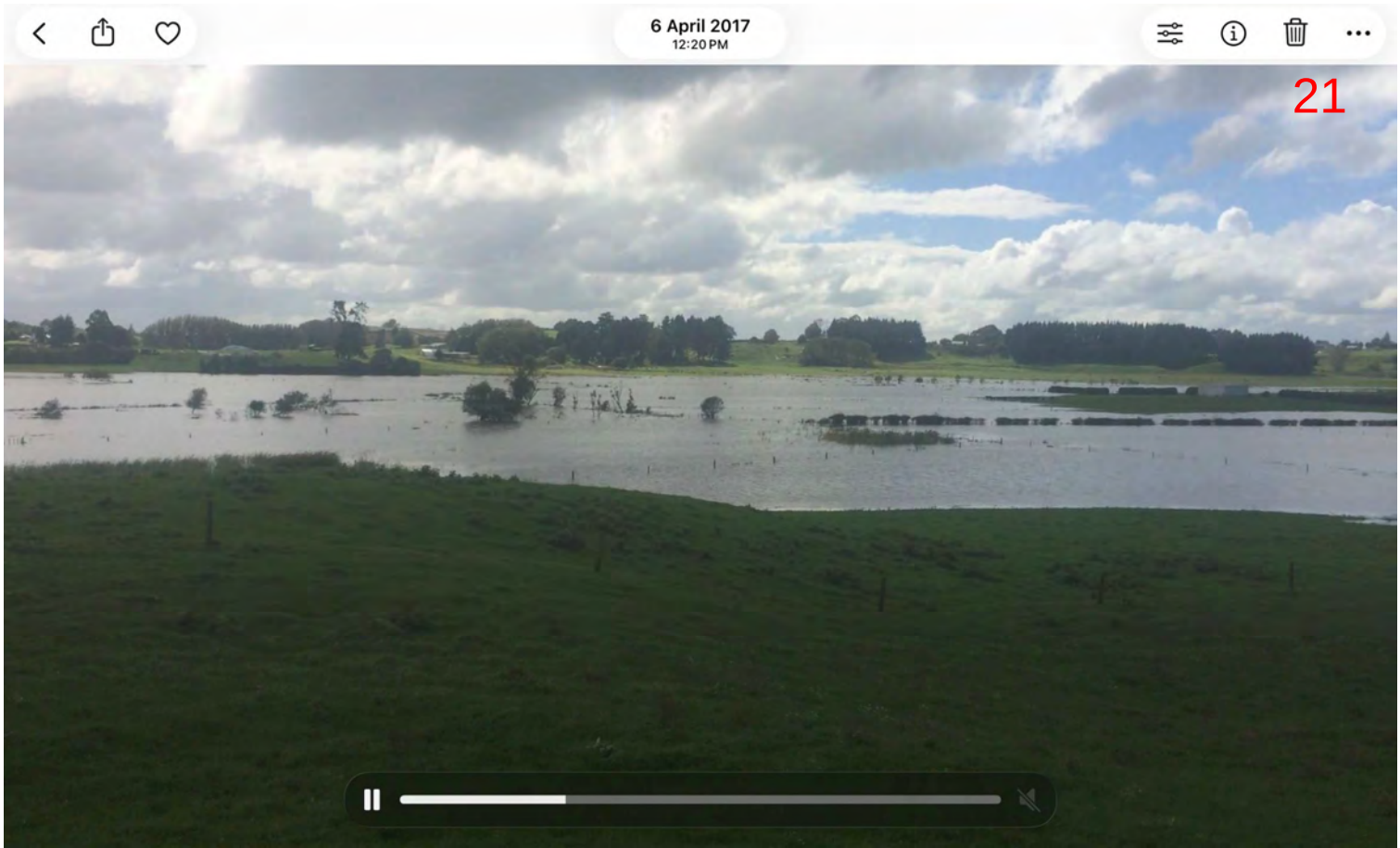
We respectfully ask that this proposal be viewed not only through the lens of accommodating future growth, but also as an opportunity to improve the long-term resilience of the Lake Ngarotoiti catchment for the benefit of existing landowners, future residents, productive rural businesses and the wider community.

Submitted respectfully by

Monie Farms Ltd

Owners and Operators of Two Dairy Farms within the Lake Ngarotoiti Catchment







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