

From: [Katrina Andrews](#)
To: [Policy Shared](#)
Subject: External Sender: Proposed Private Plan Change 35 - Waikato Regional Council submission
Date: Thursday, 13 November 2025 5:04:26 pm
Attachments: [Waikato Regional Council Submission to Proposed Private Plan Change 35 - Te Awamutu Retail Centre.pdf](#)

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Kia ora,

Please find attached Waikato Regional Council's submission to Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan.

WRC appreciates the opportunity to provide comment on this proposed plan change.

Additionally, I left Peter a voicemail yesterday, as WRC staff would appreciate the opportunity to start a wider discussion with Waipā District Council staff about development within the Mangapiko and Mangaohoi catchments in Te Awamutu. I would be very happy to facilitate organising a meeting for this.

Any questions or issues with the submission, please don't hesitate to contact me.

Ngā mihi nui,
Katrina

Katrina Andrews | SENIOR POLICY ADVISOR | Strategic and Spatial Planning, Science, Policy and Information
WAIKATO REGIONAL COUNCIL | Te Kaunihera ā Rohe o Waikato

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Document No: 33746381
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02

10 November 2025

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Te Awamutu 3840

Private Bag 3038
Waikato Mail Centre
Hamilton 3240, NZ

waikatoregion.govt.nz
0800 800 401

Attn: Proposed Private Plan Change 35 Submission

Email: districtplan@waipadc.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission to Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan

Thank you for the opportunity to make a submission on Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan. Please find attached the Waikato Regional Council's submission regarding this document. This submission was formally endorsed under delegated authority on 10 November 2025. Waikato Regional Council looks forward to being involved in further discussion regarding the proposed plan change.

Should you have any queries regarding the content of this document please contact Katrina Andrews, Senior Policy Advisor, Strategic and Spatial Planning directly on (07) 8590 929 or by email Katrina.Andrews@waikatoregion.govt.nz.

Regards,

A handwritten signature in blue ink, appearing to be 'Tracey May', with a small blue dot to the right of the signature.

Tracey May
Director Science, Policy and Information

Submission from Waikato Regional Council to Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan

10 November 2025

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan (PC35). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District plans, including plan changes such as this one, are required to give effect to the WRPS under Resource Management Act 1991 (RMA) section 75(3)(c).
2. WRC is neutral as to the proposed rezoning of 638 Cambridge Road ('Area B' of the plan change site) from Medium Density Residential Zone to Commercial Zone and the proposed amendments to district plan provisions relating to the Te Awamutu Large Format Retail Area. Our submission focuses on the flood hazard assessment within the private plan change request.
3. The Hazards and risks (HAZ) chapter of the WRPS sets out objectives, policies and methods to manage the effects of natural hazards on people, property and the environment. Objective HAZ-O1, Policies HAZ-P1 and P2 and Method HAZ-M11 are particularly relevant to the proposed plan change given the site's location on the edge of the Mangaohoi Stream floodplain. Policy HAZ-P1 directs that:

"Natural hazard risks are managed using an integrated and holistic approach that:

- 1. ensures the risk from natural hazards does not exceed an acceptable level;*
- 2. protects health and safety;*
- 3. avoids the creation of new intolerable risk;*
- 4. Reduces intolerable risk to tolerable or acceptable levels;*
- 5. enhances community resilience;*
- 6. is aligned with civil defence approaches;*
- 7. prefers the use of natural features over man-made structures as defences against natural hazards;*
- 8. recognises natural systems and takes a 'whole of system' approach; and*
- 9. seeks to use the best available information/best practice."*

4. We have concerns about the information and conclusions reached in the General Civils and Three Waters Report (Appendix F to the plan change request) in relation to the assessment of flood hazard. In order to give effect to the above provisions of the WRPS, we consider that further assessment is required to demonstrate that the site can be developed without increasing flood levels in the floodplain at the plan change site or increasing flows in the Mangaohoi Stream downstream of the site.
5. We provide specific recommendations for further assessment, with accompanying reasons, in the table below.

Table of specific submission points: WRC submission to Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan

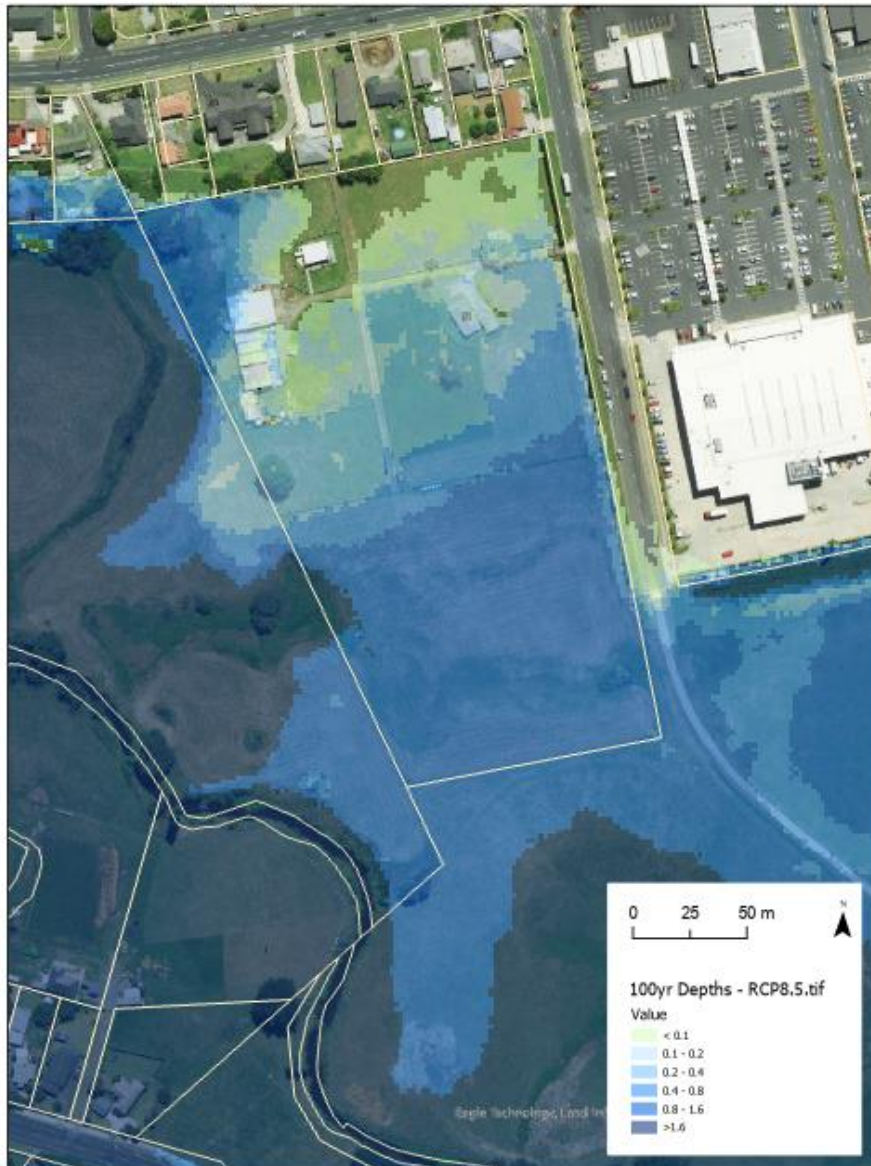
Submission point	Provision	Support/ oppose	Submission	Relief sought
Flood hazard assessment				
6.	General Civils and Three Waters Report (Appendix F to the plan change request)	Further assessment recommended	‘Section 2.3 – Flood Hazard’ of the General Civils and Three Waters Report states that the 1% Annual Exceedance Probability (AEP) flood level at the site boundary is approximately 46.95m (47.17m in Moturiki Datum). The report does not provide any information as to how this level was derived or for what climate scenario it is valid for.	Provide further detail as to how the 1% AEP flood level at the site boundary was calculated and for what climate scenario this level is valid for.
7.	General Civils and Three Waters Report	Further assessment recommended	The flood maps appended to the report (Appendix B) show the Mangaohoi Stream with dry sections of stream bed during the 2-year event. In the largest event modelled (the 100-year ARI RCP 6.0), flows in the Mangaohoi Stream are contained entirely within the channel. We consider this suggests that the model is significantly underestimating flooding. It seems likely that these maps were generated without taking the upstream Mangaohoi catchment into account. ‘Section 3.5 – Pre- and Post-Development Flow Analysis’ states that a scenario was run with a constant downstream water level of 46.95m. We assume this relates to the map titled “1% AEP boundary conditions”. It seems this map was generated using a static downstream water level boundary and may not take flows from the upstream Mangaohoi catchment into account. This would also result in an underestimation of flooding.	Provide more detail on the flood model configuration, including where the downstream boundary has been positioned and how the upstream Mangaohoi catchment has been accounted for.
8.	General Civils and Three Waters Report	Further assessment recommended	Te Miro Water has recently completed a flood modelling study of the Mangapiko and Mangaohoi Streams at Te Awamutu. Te Miro Water was initially engaged by Waipā District Council and on completion of the project, provided the model and results to WRC. WRC staff have reviewed the model and accepted it as being suitably robust. We understand this model represents the best available flood information for the site.	Provide more robust analysis to demonstrate that the site can be developed without increasing flood levels in the floodplain at the plan change site or increasing flows in the Mangaohoi

Submission point	Provision	Support/ oppose	Submission	Relief sought
			The Te Miro Water model provides the following flood levels at the site for the 1% AEP event under various climate scenarios: • Historic climate - 47.22m R.L. Moturiki Datum; • RCP 6.0 scenario - 47.69m R.L. Moturiki Datum; and • RCP 8.5 scenario - 47.95m R.L Motutiki Datum. The images in Appendix 1 show the modelled flood depth from the Te Miro Water model for the RCP 6.0 and 8.5 scenarios. The Te Miro Water model shows that a significant portion of Area B is with the floodplain of the Mangaohoi Stream. This represents a larger portion of the site compared to the flood maps appended to the General Civils and Three Waters Report. The site is at the edge of an extensive floodplain. Any displacement of flood waters through filling of the site will result in an increase in flood levels on approximately 160 properties; many of which contain existing dwellings. Displacement of flood waters will also result in an increase in flow in the Mangaohoi Stream downstream of the floodplain. The plan change site is one of many in the floodplain that have been zoned for urban development. While each potential development could result in a small increase in flood levels and downstream flows, the cumulative effects of successive developments will be significant, potentially resulting in flooding of numerous properties that would otherwise not be flood affected and increasing flood levels at numerous properties that are already at risk. Given the above, we consider that a significantly more robust analysis is required to demonstrate that the site can be developed without increasing flood levels in the floodplain at the plan change site or increasing flows in the Mangaohoi Stream downstream of the site.	Stream downstream of the site.

Appendix 1 - Modelled flood depth for RCP 6.0 and 8.5 scenarios from the Te Miro Water modelling for the Mangapiko and Mangaohoi Streams



**Mangapiko and Mangaohoi River Flooding
Maximum Flood Depth 1% AEP RCP 6.0**



Mangapiko and Mangaohoi River Flooding
Maximum Flood Depth 1% AEP RCP 8.5

Further information and hearings

WRC **wishes to be heard** at the hearings for Proposed Private Plan Change 35 – Te Awamutu Retail Centre to the Waipā District Plan 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.

Submitter details

Waikato Regional Council

Contact person: Katrina Andrews (Strategic and Spatial Planning)

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Hamilton 3240

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.