

TO: GWRC Hutt Valley Flood Management Subcommittee – FINAL
 FROM: “Save Our Hills” team on behalf of petitioners

RE: The terms of reference for an audit of GWRC’s Pinehaven Stream study

Thank you for the opportunity to comment on the Terms of Reference. We are keen for the audit to be a worthwhile and prudent use of ratepayers’ money.

We have read the document titled “Request for Proposal for the Audit of Pinehaven Stream Flood Hazard Mapping”, sent to us by Alistair Allan. We acknowledge and appreciate efforts being made by GWRC to address our concerns. We are writing in advance of our meeting with you on 23rd January to advise you that our concerns are not being addressed by the proposed audit.

We wish to make this point very clear: this is NOT the audit we have been asking for.

By writing in advance of the meeting we hope that headway can be made to revise the terms of reference to ensure the audit does address our concerns.

We have carried out several detailed case studies, investigating the correlation between GWRC’s flood calculations and Q100 flood maps. *These case studies highlight significant discrepancies between the calculations and the maps.*

The current terms of reference for the audit do NOT address these discrepancies. They only repeat what is already known, wasting time and ratepayers’ money.

The current Terms of Reference (and why they are of little value) are:

1. **Hydrology:** this has already been reviewed, therefore why repeat it?
2. **Modelling method:** this has already been reviewed, so why repeat it?
3. **Freeboard:** we are not contesting freeboard (just asking that it be shown differentiated from actual floodwater in the maps, like other Councils do)

If the audit is limited to the above terms of reference, the audit will be prevented from investigating the contradictions we have found in the flood maps. For the audit to be a worthwhile and judicious use of ratepayers’ money, the terms of reference must be changed. The terms of reference we propose are:

1. **Investigation of discrepancies** between GWRC’s flood calculations and Q100 flood maps: even without freeboard, the maps show significantly more floodwater than the calculated 1-in-100 year flows – why is this?
2. **Baselines for stormwater neutrality:** The process of using known run-offs from existing hill sub-catchments as baselines for assessing stormwater neutrality of future development must be made explicit in the FMP
3. **Future case scenario:** How can the impact of 1,665 new houses on hill sub-catchments be only “minor”? Use this scenario to show how future development will be assessed and controlled for stormwater neutrality.

We have been endeavoring to obtain clarification from GWRC about these issues for the last 6 months, but it has not been forthcoming. Some information that we have been given by GWRC is contradictory. This lack of critical information from GWRC to substantiate the Q100 flood maps suggests something about the flood maps is being hidden from the public, something to do with future development.

We have been reliably informed that development of the hill sub-catchments is being designed right now. Stormwater run-off from development on the hills is a significant hurdle for a developer. The discrepancies in the flood maps could accommodate significant run-off from future development on the hills, removing this hurdle for developers, but with devastating impact on people and property in the Pinehaven Stream catchment.

The current terms of reference for the audit do not address these critical issues. Furthermore, the proposed deliverables are extremely limited. They amount to nothing more than a summary statement about “fitness for purpose” of the maps based on tick box YES/NO questions devised by GRWC staff. This is the same staff who have been side-stepping our concerns for the last 6 months, asserting that the flood maps are “fit for purpose”. The proposed deliverables are woefully insufficient, and a statement of “fitness for purpose” arising from the audit will merely serve to cover up the contradictions and discrepancies in the flood maps.

The terms of reference we have proposed need to be independently investigated in the audit. Furthermore, full and detailed results need to be made transparent to the public, so that ratepayers can have confidence in the Council’s use of their money and so that Pinehaven and Silverstream residents can have confidence in the accuracy of the flood maps.

Thank you for your consideration of these issues. We look forward to your prompt response.

Yours sincerely,
Stephen Pattinson and Darryl Longstaffe

On behalf of “SAVE OUR HILLS” petitioners

14 January 2015

NB: Please also see Technical attachment (4 pages)