



22 April 2024

Submission to:
Horizons Regional Council

Via email:
district.advice@horizons.govt.nz

Review of the dangerous dams, earthquake-prone dams and flood-prone dams policy

Rangitikei District Council appreciates the opportunity to comment on Horizons Regional Council's draft Policy on dangerous, earthquake-prone and flood-prone dams.

The Council is supportive of the draft Policy and how it was developed.

We are pleased that the regional councils have collaborated in developing a policy for consideration in all the regions: this is a pragmatic approach given the need to ensure the requirements of the Building (Dam Safety) Regulations 2022 are met consistently throughout New Zealand. In addition, and most importantly, the draft policy reflects sound engineering practice. We note that the draft policy takes into account the Government's decision on 28 March 2024 to raise the height threshold to four metres.

We are aware that the draft policy (and the regulations behind it) will require consideration of some of our infrastructure. Most notable are 'B' and 'C' dams at the Tutaenui Reservoirs where we have engaged expertise to improve their safety. However, we shall also check our various wastewater ponds to be sure that any which are deeper than four metres are assessed, having regard for the potential toxicity of the sludge they contain. We appreciate the helpful approach set out in section 5.2 of the draft Policy, which notes that Horizons will set timeframes for action in each particular case.

We are glad to see the emphasis in section 4 on communication and the commitment in section 5 to ensure territorial authorities are notified about any dangerous dams in their areas. We suggest that this approach is carried into section 6, so that before exercising any powers to address a dangerous dam, Horizons alerts the relevant territorial authority so that it is prepared for a civil defence response in the event of a failure of the dam.

While section 7, which sets out Horizons' priorities, reflects those by the Waikato Regional Council, we wonder whether it is worth including the additional priority proposed by the Hawke's Bay Regional Council, 'to minimise the risk to damage or loss of property'.

We understand your reason for including 'referable' dams as this is a term used in the Building Act 2004 and appreciate the footnote clarification on page 4 about this.

We suggest the commencement date in section 3 is 13 May 2024 to align with the date when the 2022 regulations' come into effect.

The Council hopes these comments are helpful.

Kind Regards

A handwritten signature in blue ink, appearing to read "Andy Watson".

Andy Watson, Mayor
Rangitikei District Council