

EXHIBIT STATEMENT OF EVIDENCE OF KATHLEEN THIEL-LARDON

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Maps of Site Context

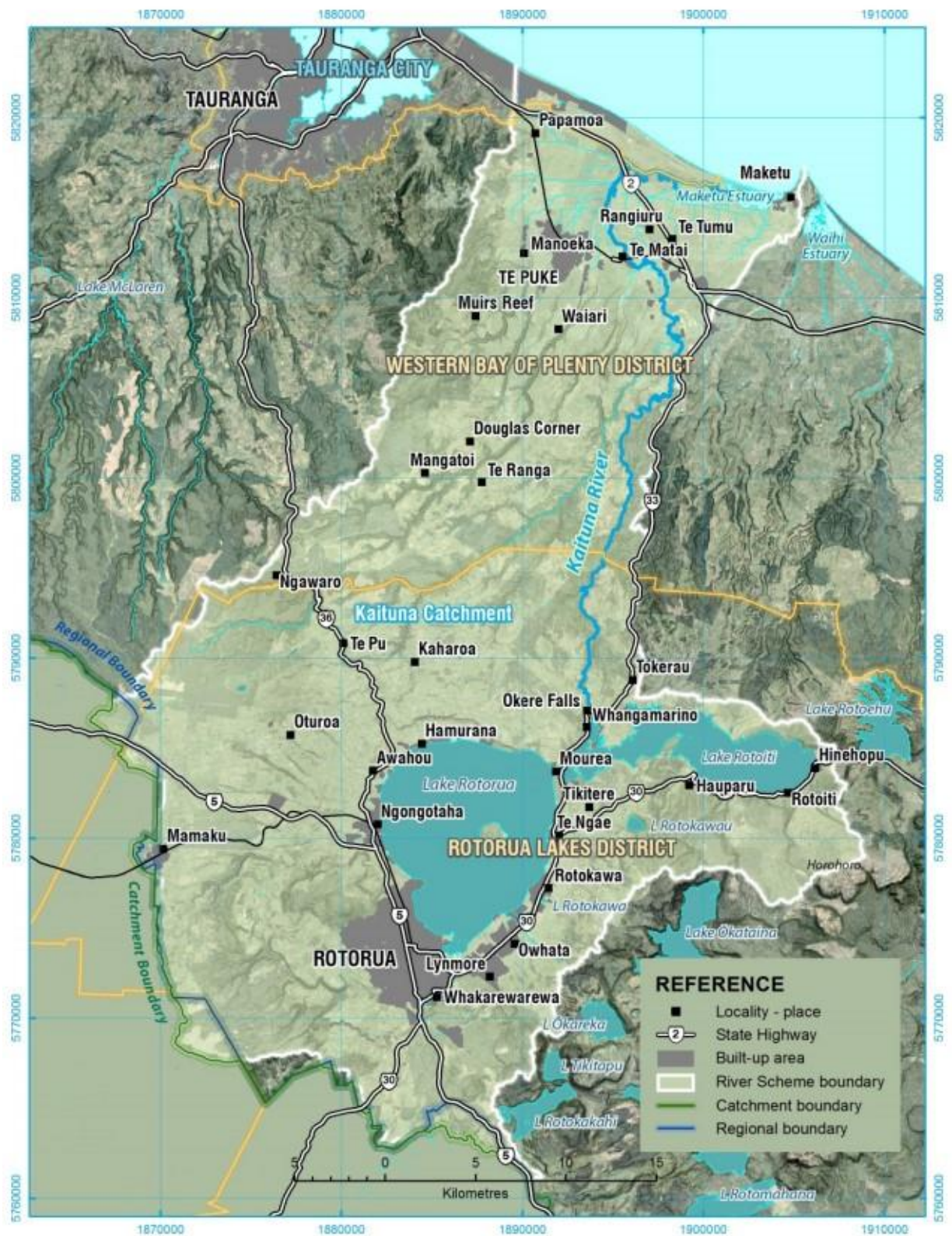


Figure 1: Kaituna Catchment

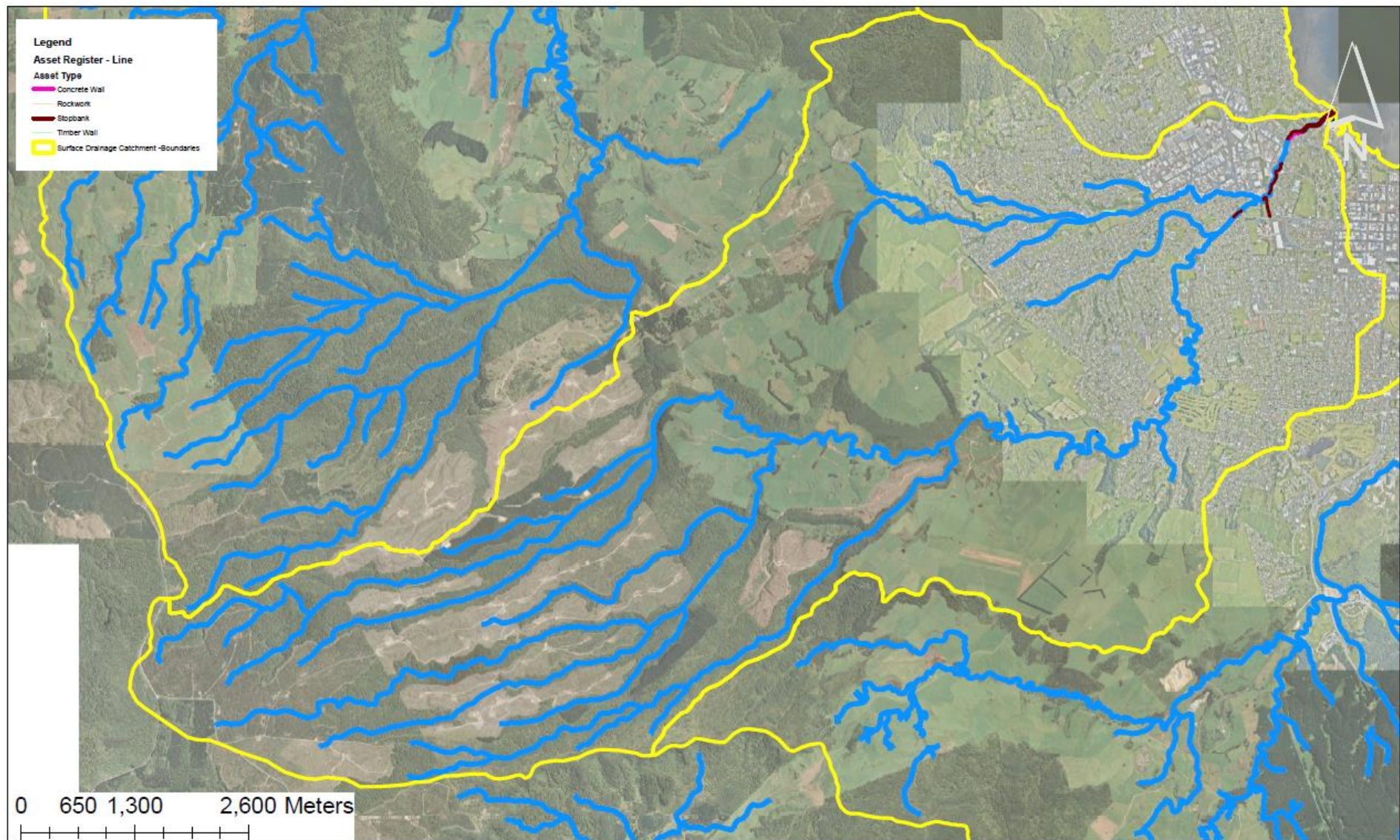


Figure 2: Utuhina Catchment



Figure 3: Lower Utuhina Flood Protection Assets



Figure 4: NZ Historical Topo Map NZMS1 – 1979

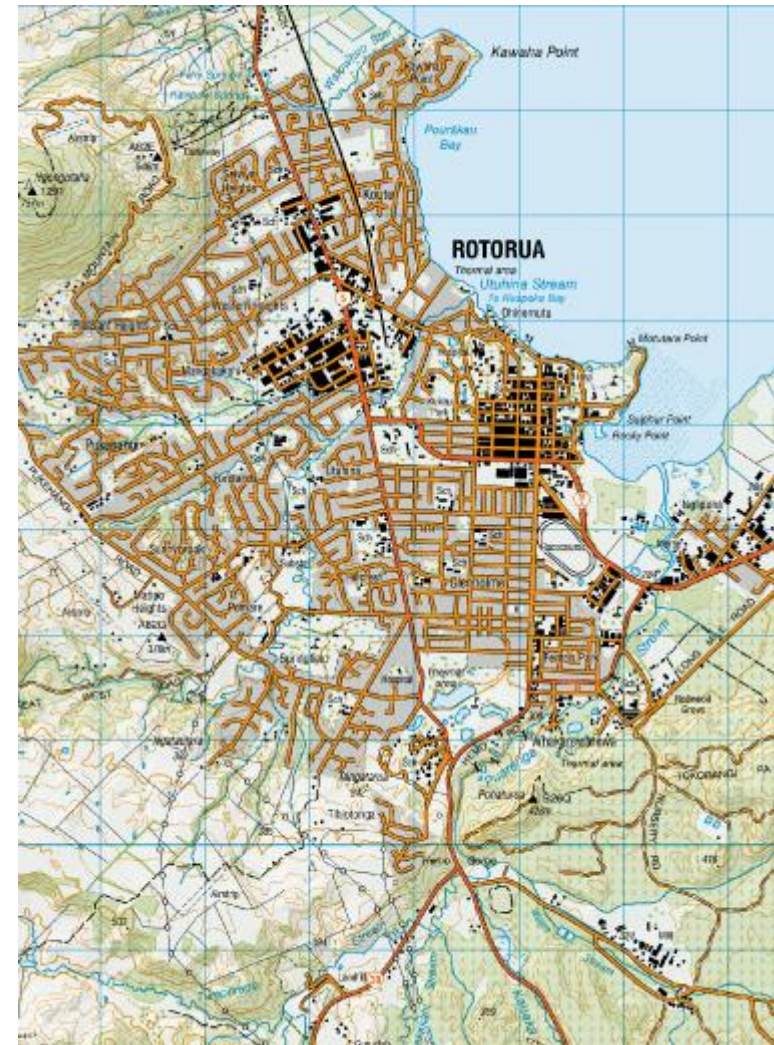


Figure 5: NZ Topo Map NZTM - 2019

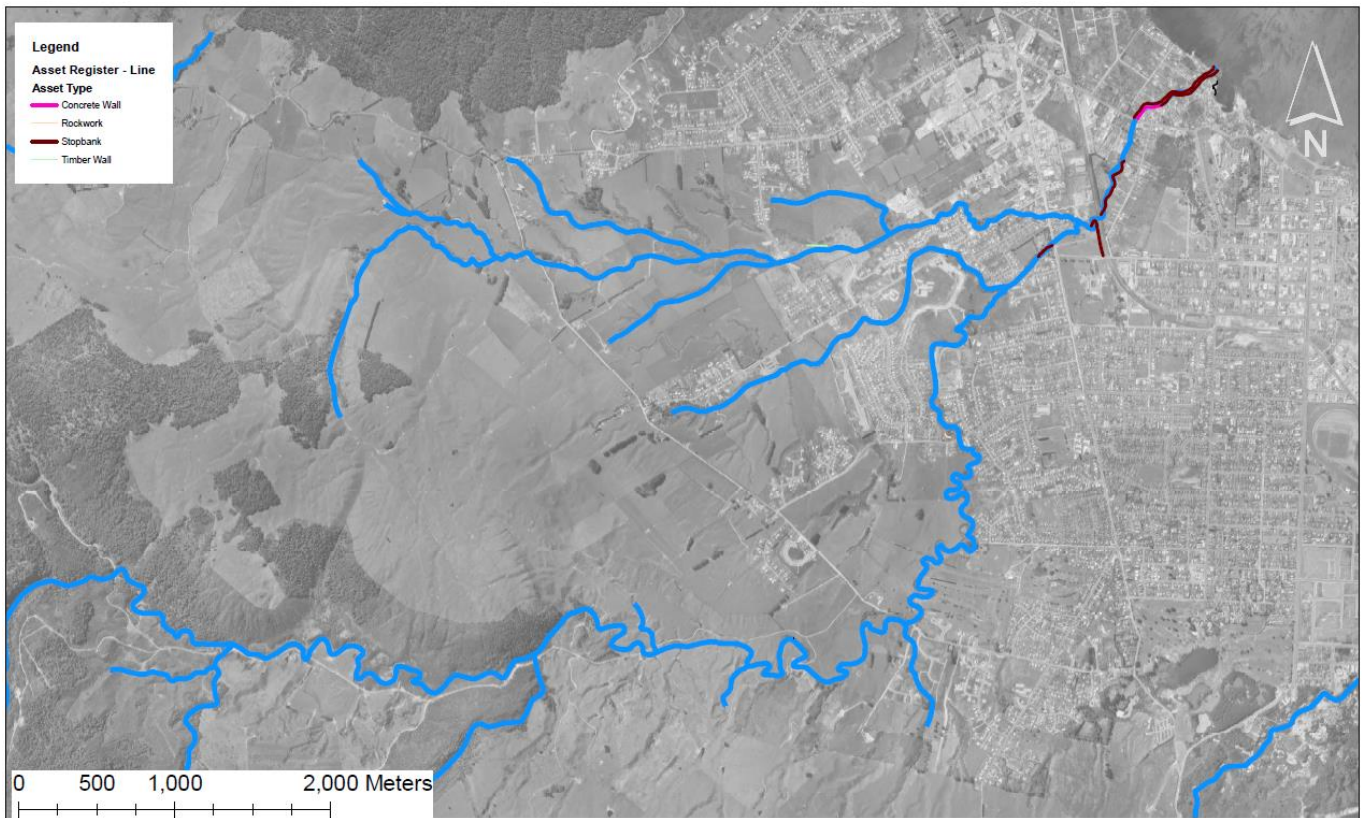


Figure 6: Aerial Image 1966-1969



Figure 7: Aerial Image 2015-2018

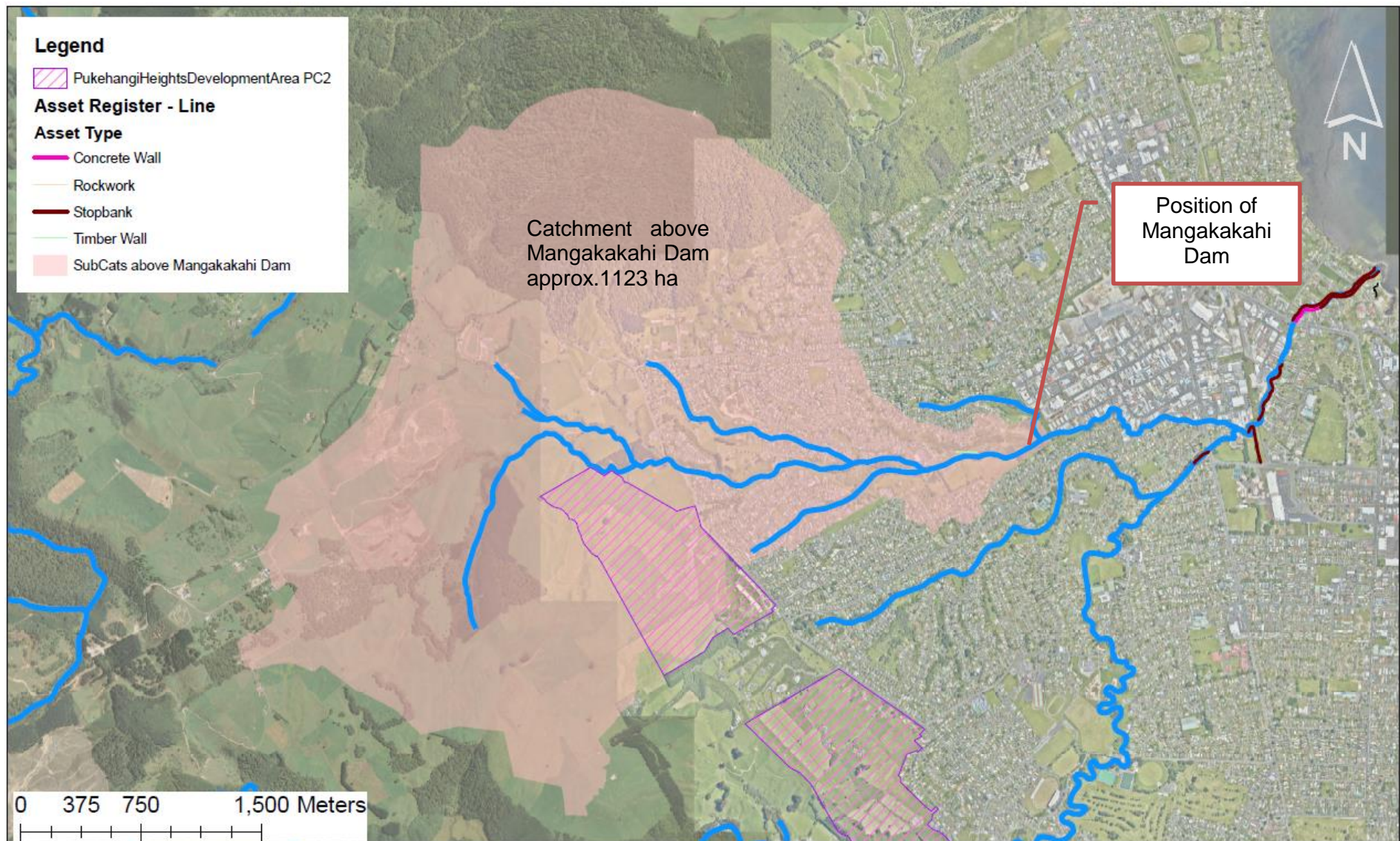


Figure 8: Mangakakahi Dam Catchment

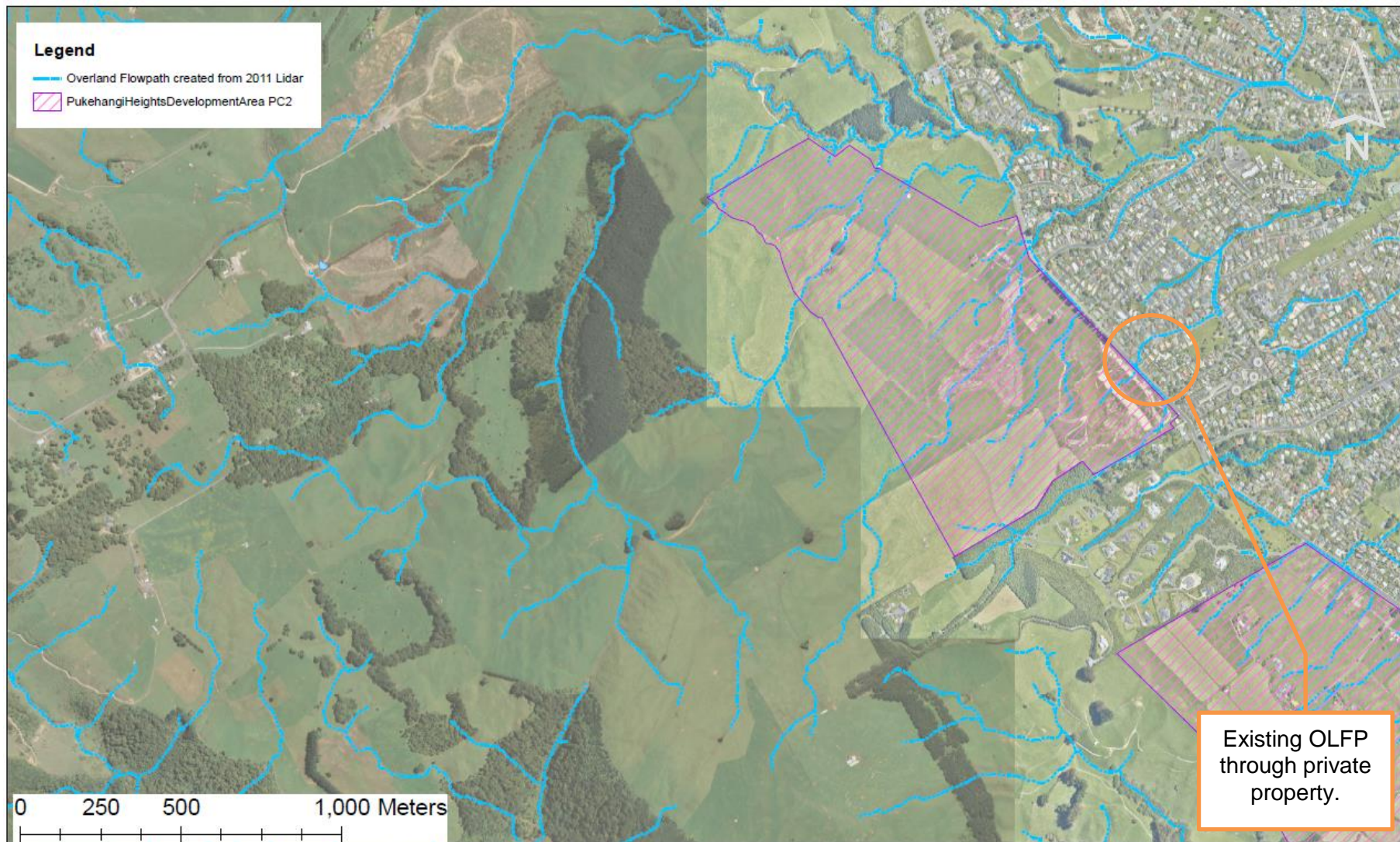


Figure 9: Pukehangi Plan Change Area – Overland flow path (OLFP) West

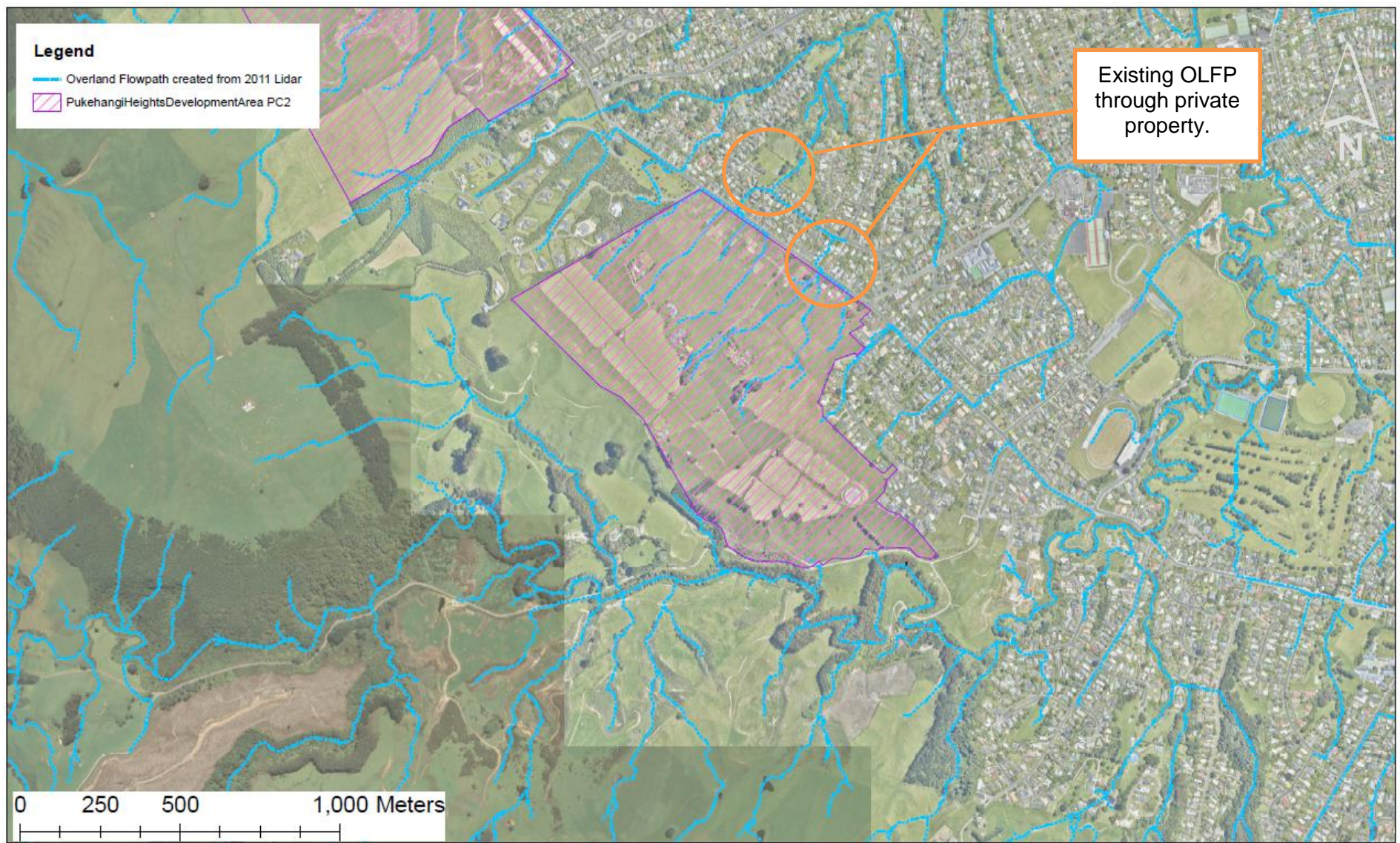


Figure 10: Pukehangi Plan Change Area – Overland Overland flow path (OLFP) East

Maps – Overview of Flood Models

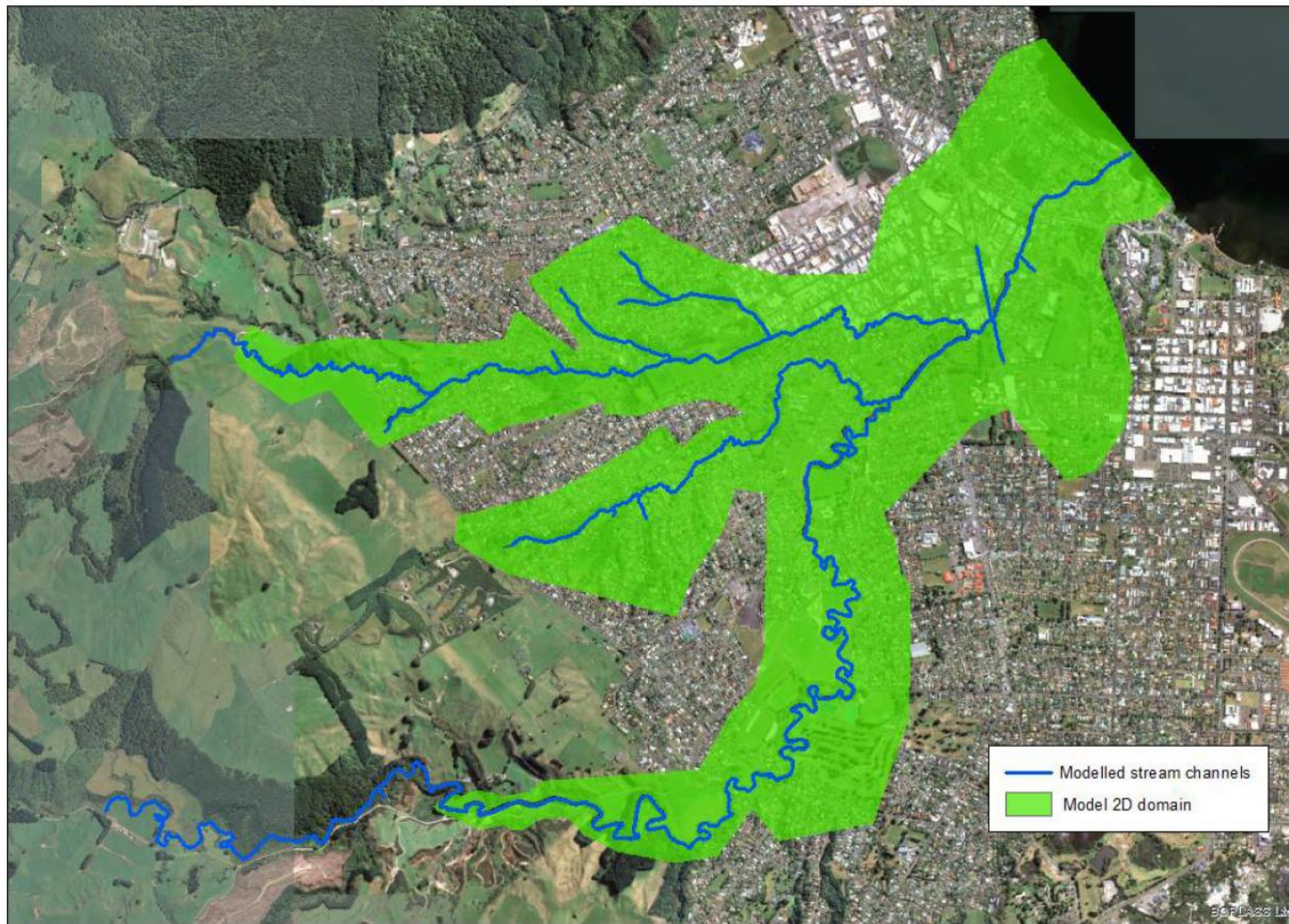


Figure 11: GUCM - Hydraulic Model layout (Mr Wallis)

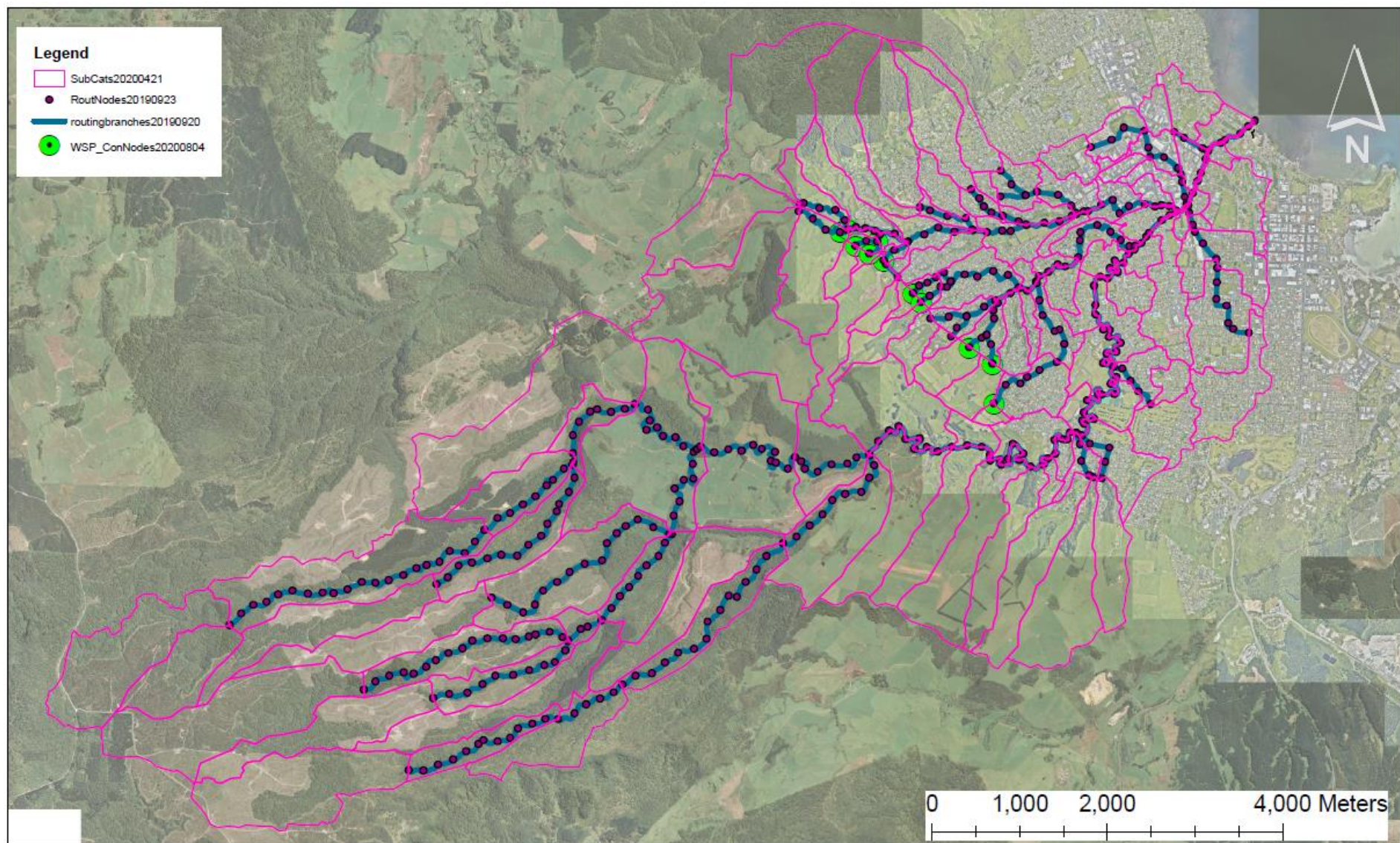


Figure 12: GUCM NRL Hydrological Model Layout (Mr West)

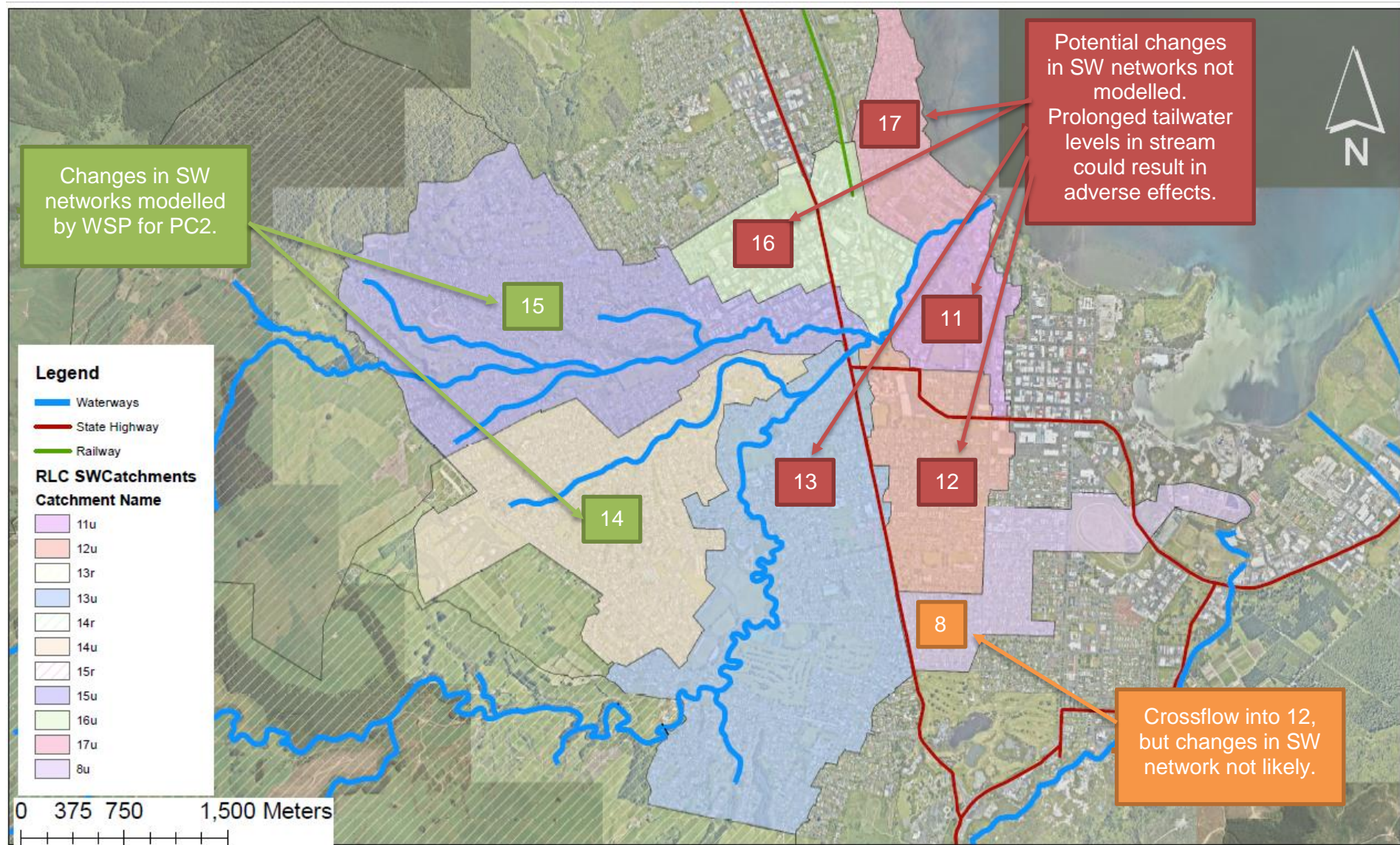


Figure 13: Rotorua Lakes Councils Stormwater Catchments

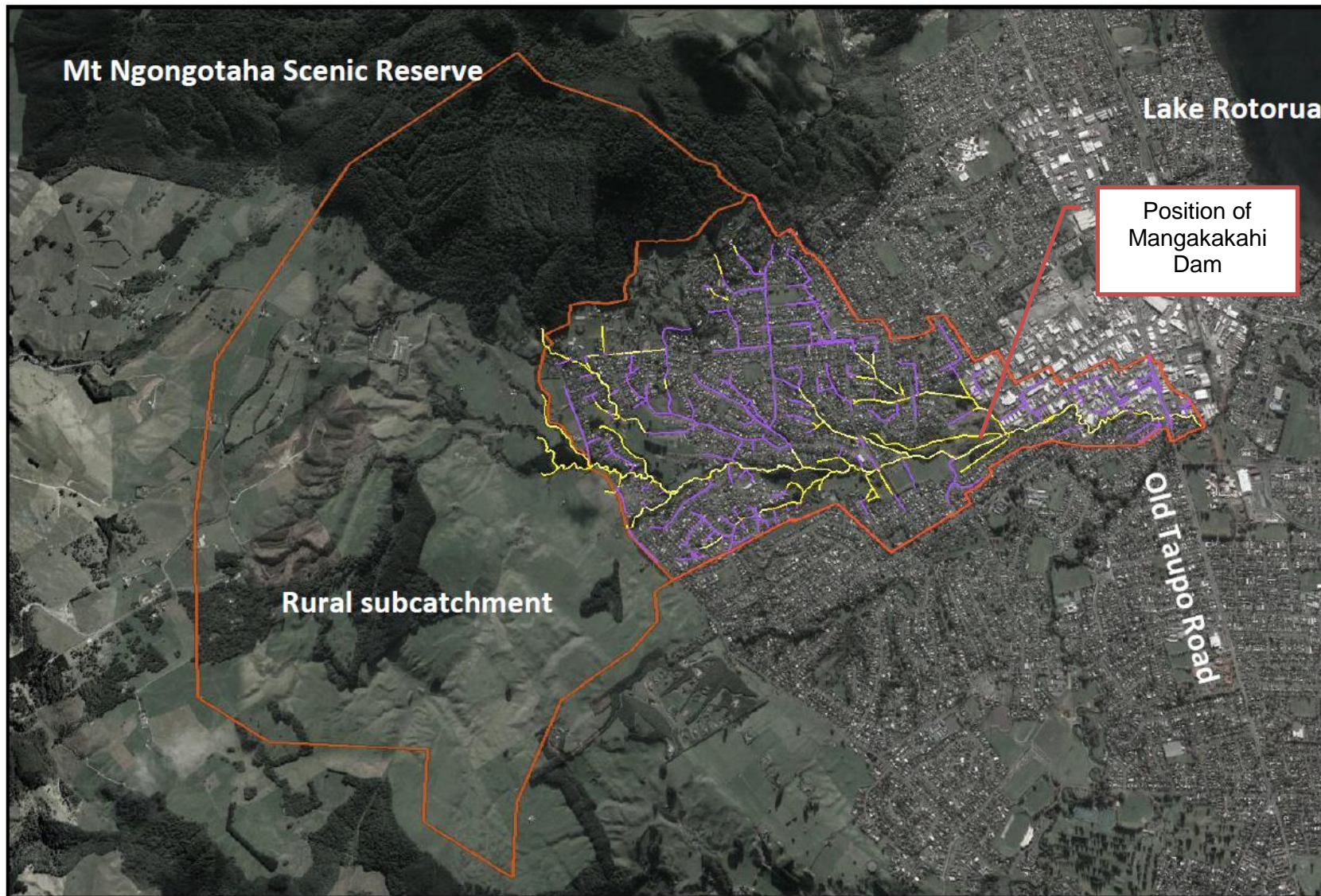


Figure 14: Rotorua Lakes Council – Catchment 15 model (RLC Stormwater Catchment 15 - Model Development Memo & System Performance Report)

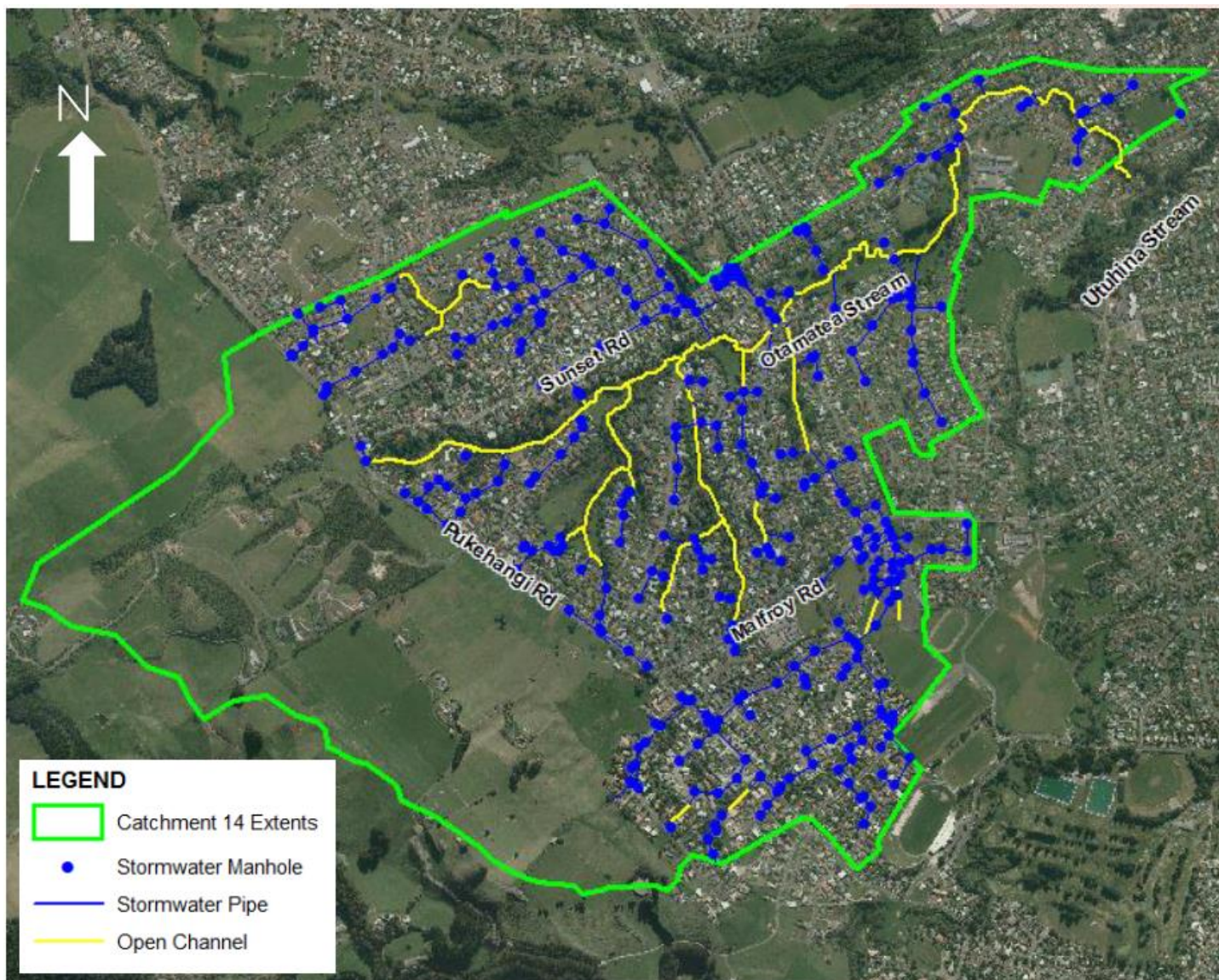


Figure 15: Rotorua Lakes Council – Catchment 14 model (RLC Stormwater Catchment 14 - Model Development Memo & System Performance Report)

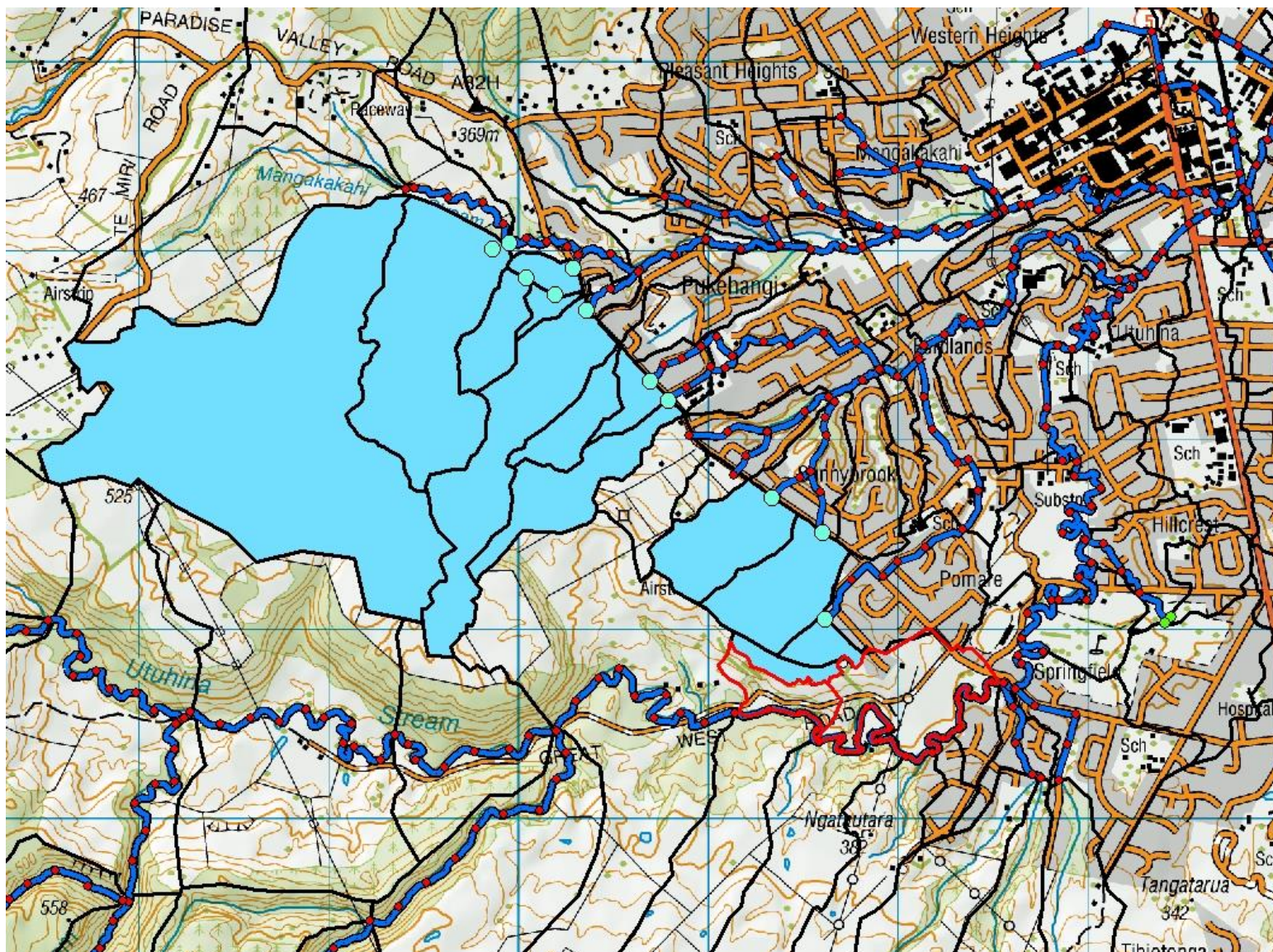


Figure 16: Rotorua Lakes Council – WSP Plan Change 2 model extent

Overview of Historic Flood Risk

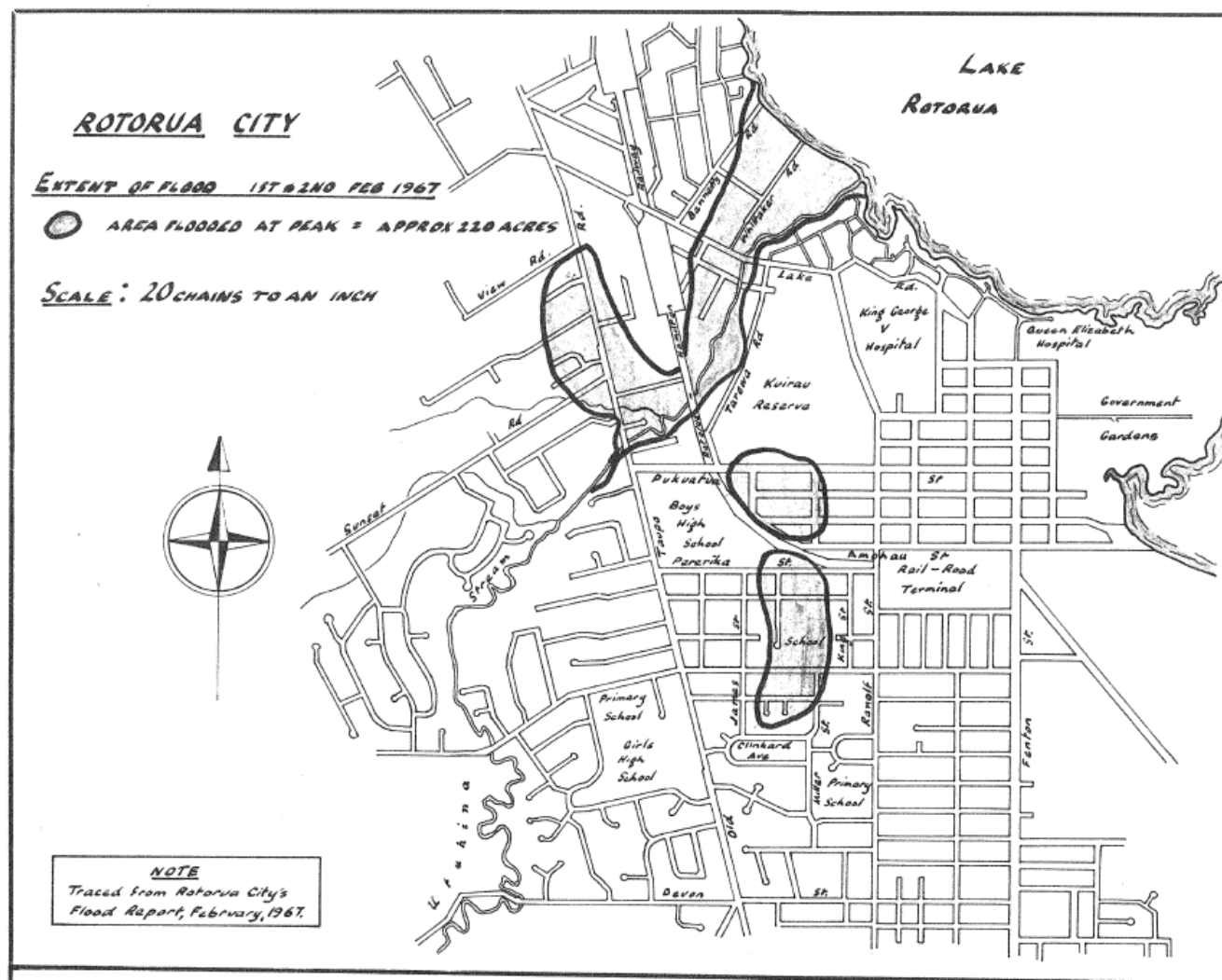


Figure 17: Extract from Kaituna River Major Scheme: Volume 5 - Plans Lakes Rotorua and Rotoiti

Overview of Existing Flood Risk

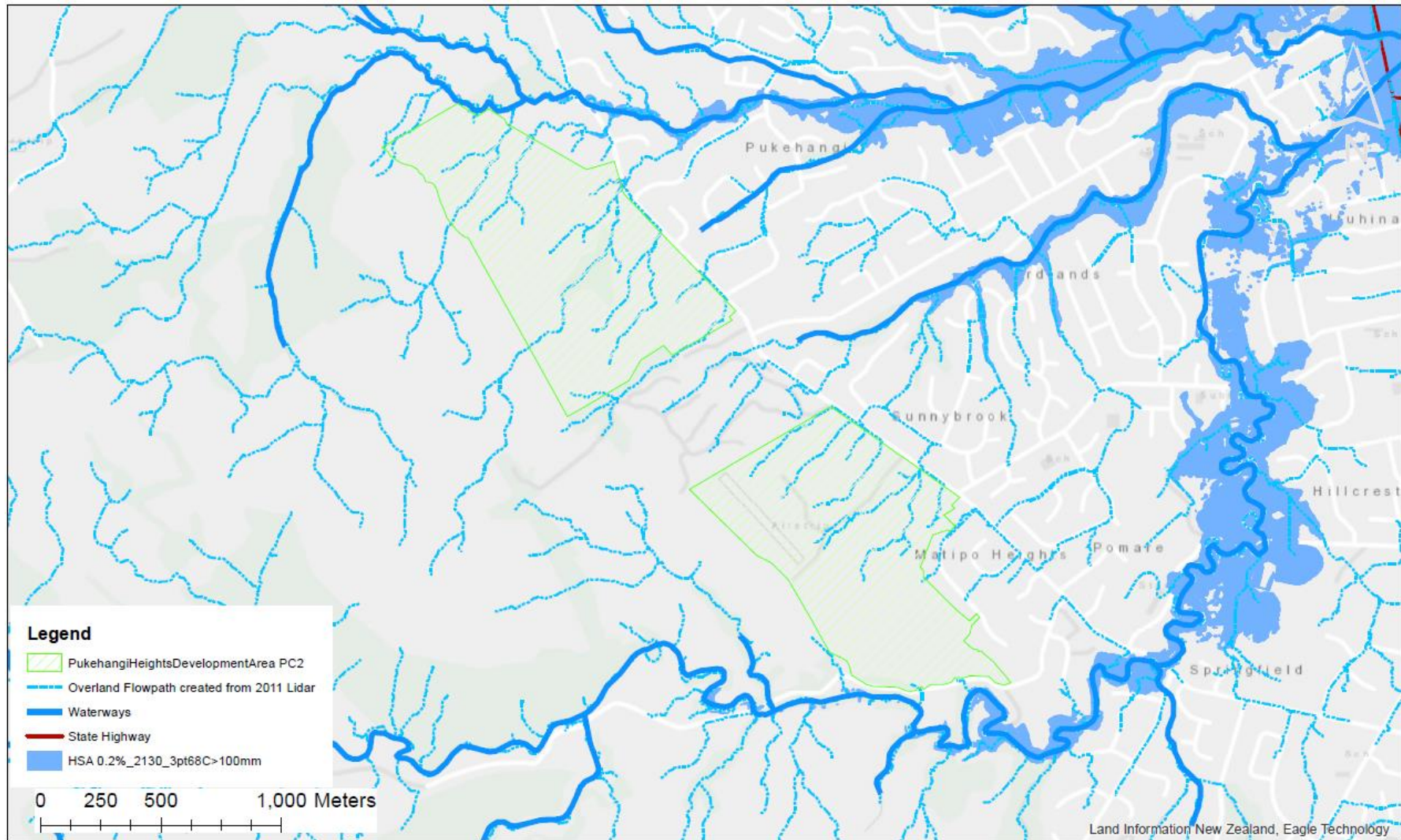


Figure 18: Flood Susceptibility Area (HSA) - 0.2% AEP 2130 >100mm flood extent from GUCM only– existing urban environment



Figure 19: Flood Susceptibility Area (HSA) - 0.2% AEP 2130 >100mm flood extent from GUCM only– existing urban environment – Mangakakahi



Figure 20: Flood Susceptibility Area (HSA) - 0.2% AEP 2130 >100mm flood extent from GUCM only– existing urban environment - Utuhina

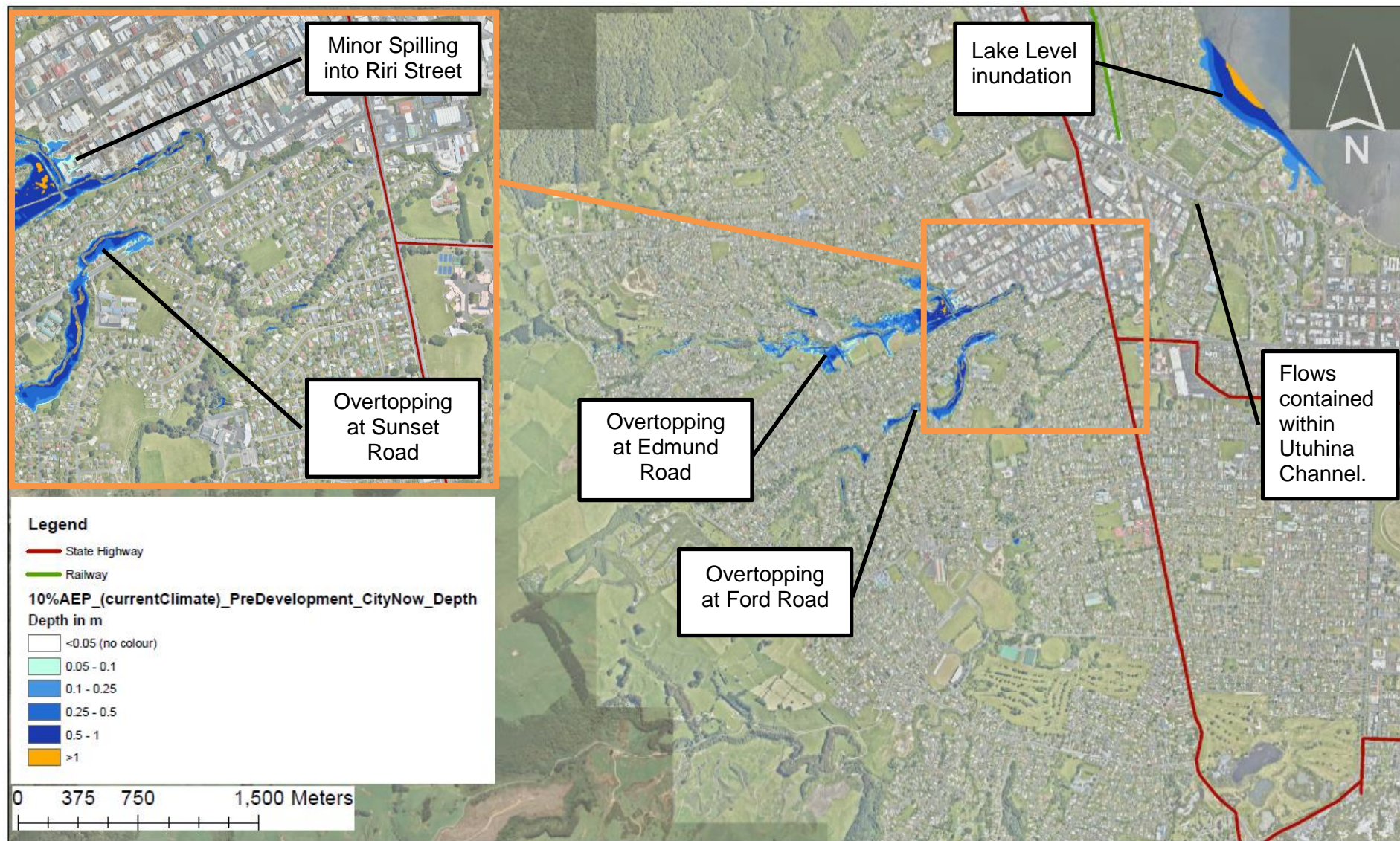


Figure 21: 10% AEP current climate pre-development flood extent from GUCM (Lower Utuhina) – existing urban environment – Depth

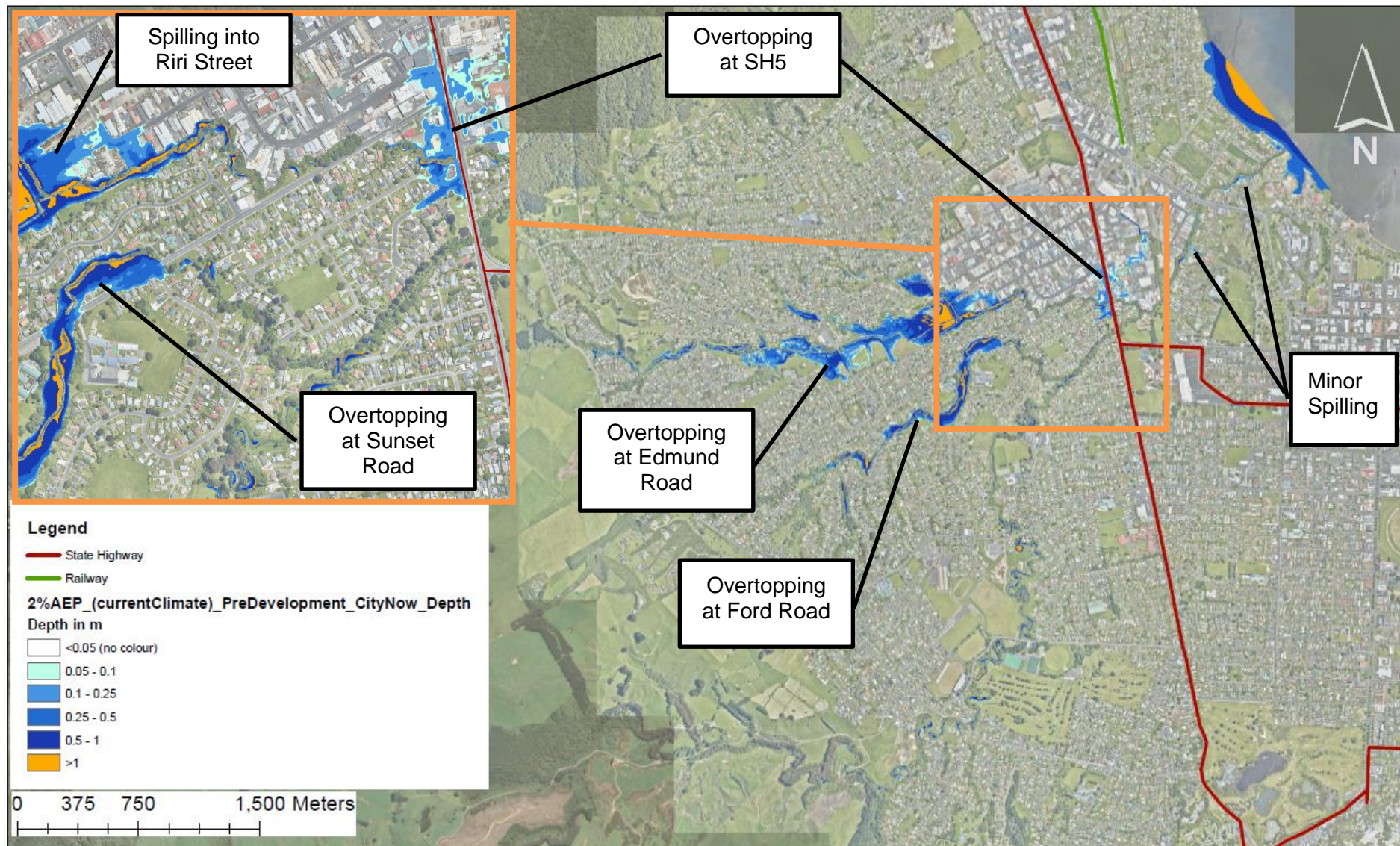


Figure 22: 2% AEP current climate pre-development flood extent from GUCM (Lower Utuhina) – existing urban environment – Depth

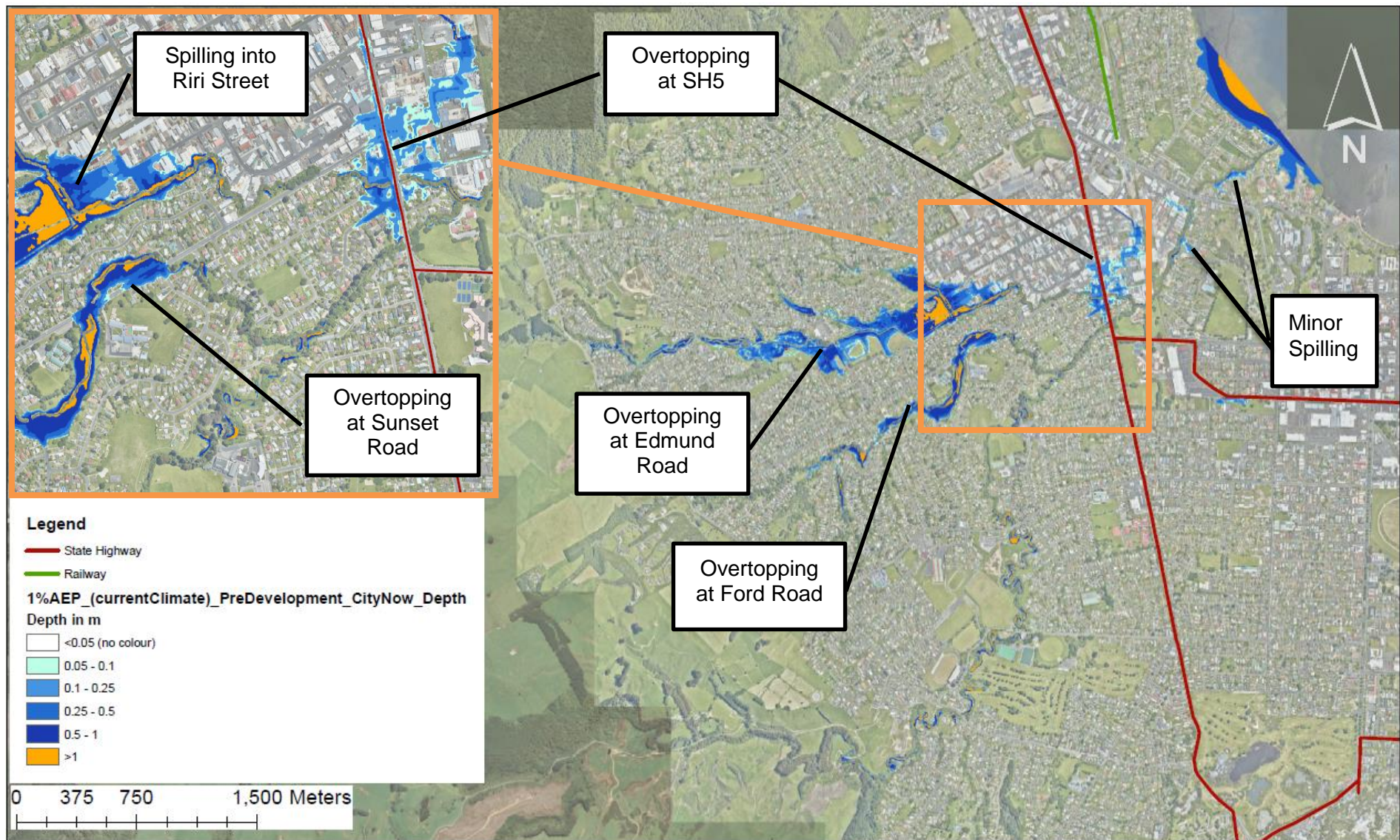


Figure 23: 1% AEP current climate pre-development flood extent from GUCM (Lower Utophina) – existing urban environment – Depth

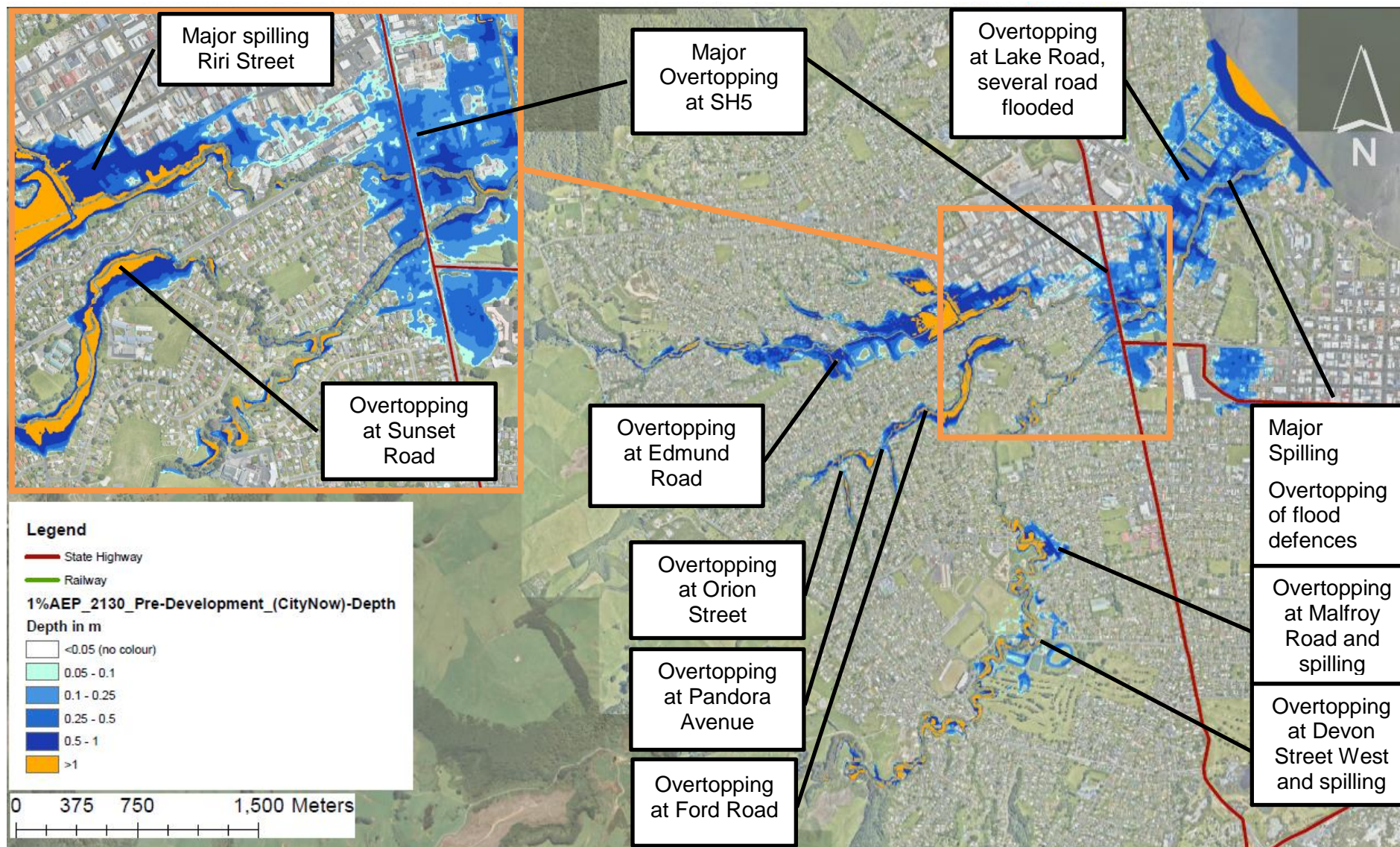


Figure 24: 1% AEP 2130 pre-development flood extent from GUCM (Lower Utuhina) – existing urban environment – Depth

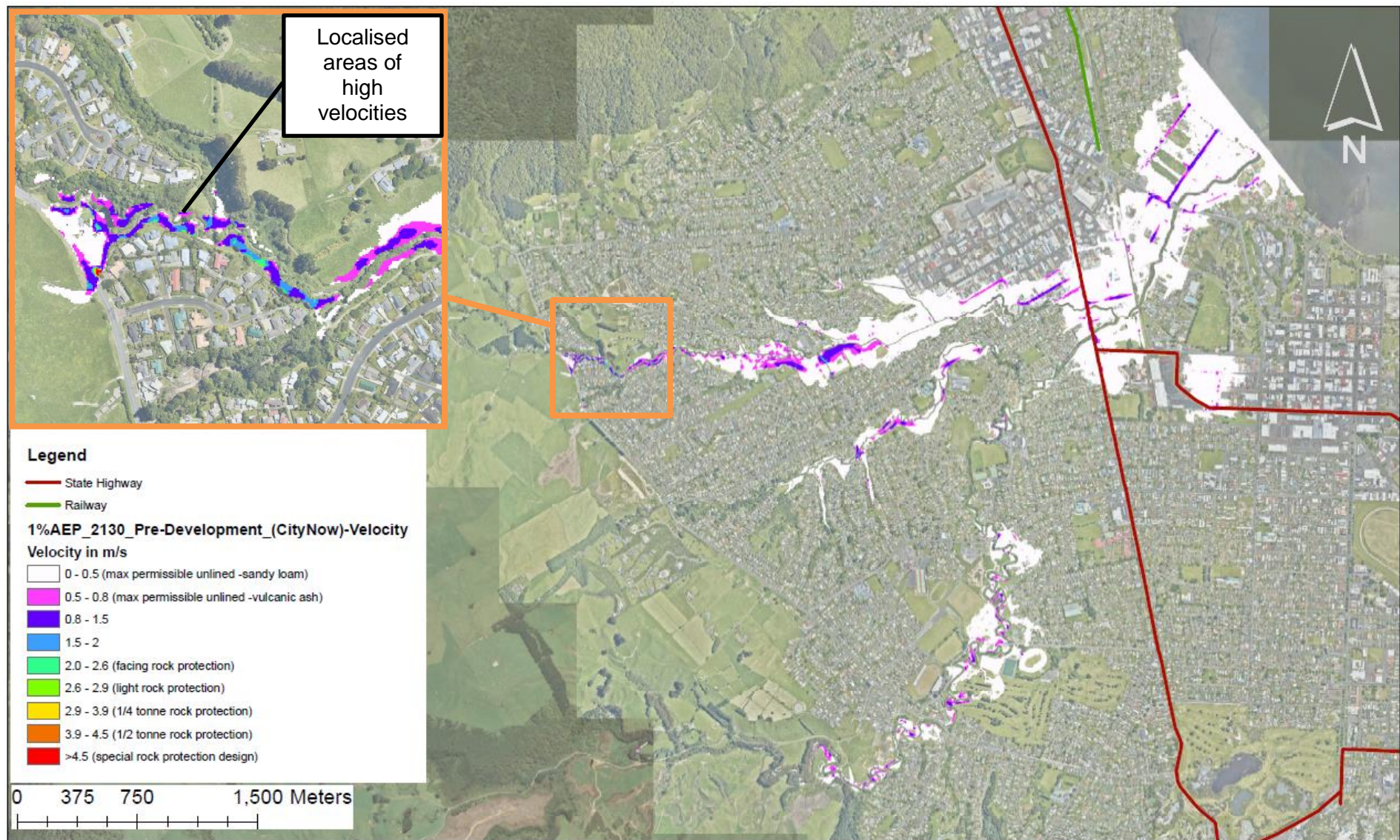


Figure 25: 1% AEP 2130 pre-development flood extent from GUCM (Lower Utuhina) – existing urban environment – Velocity

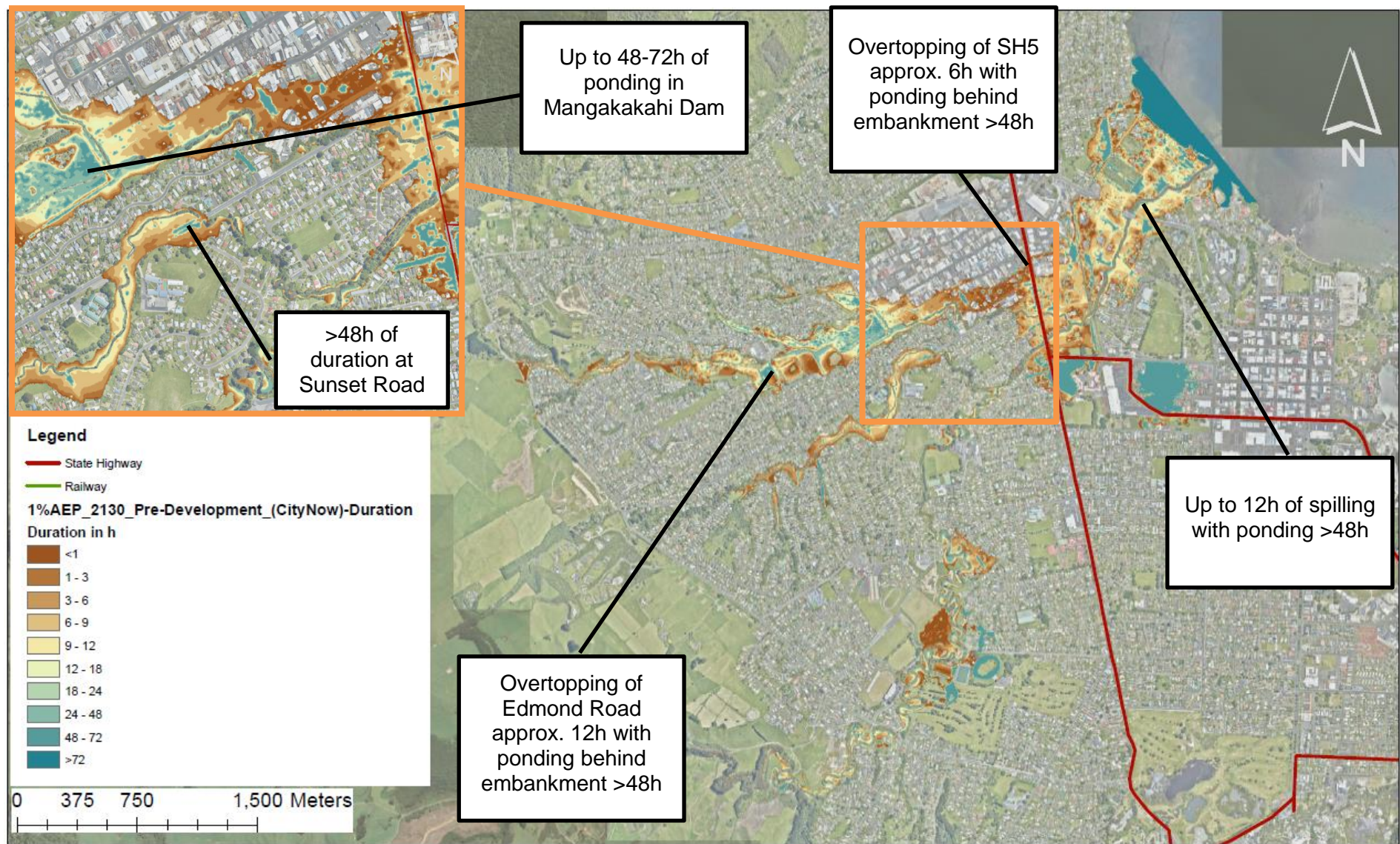


Figure 26: 1% AEP 2130 pre-development flood extent from GUCM (Lower Utuhina) – existing urban environment – Duration

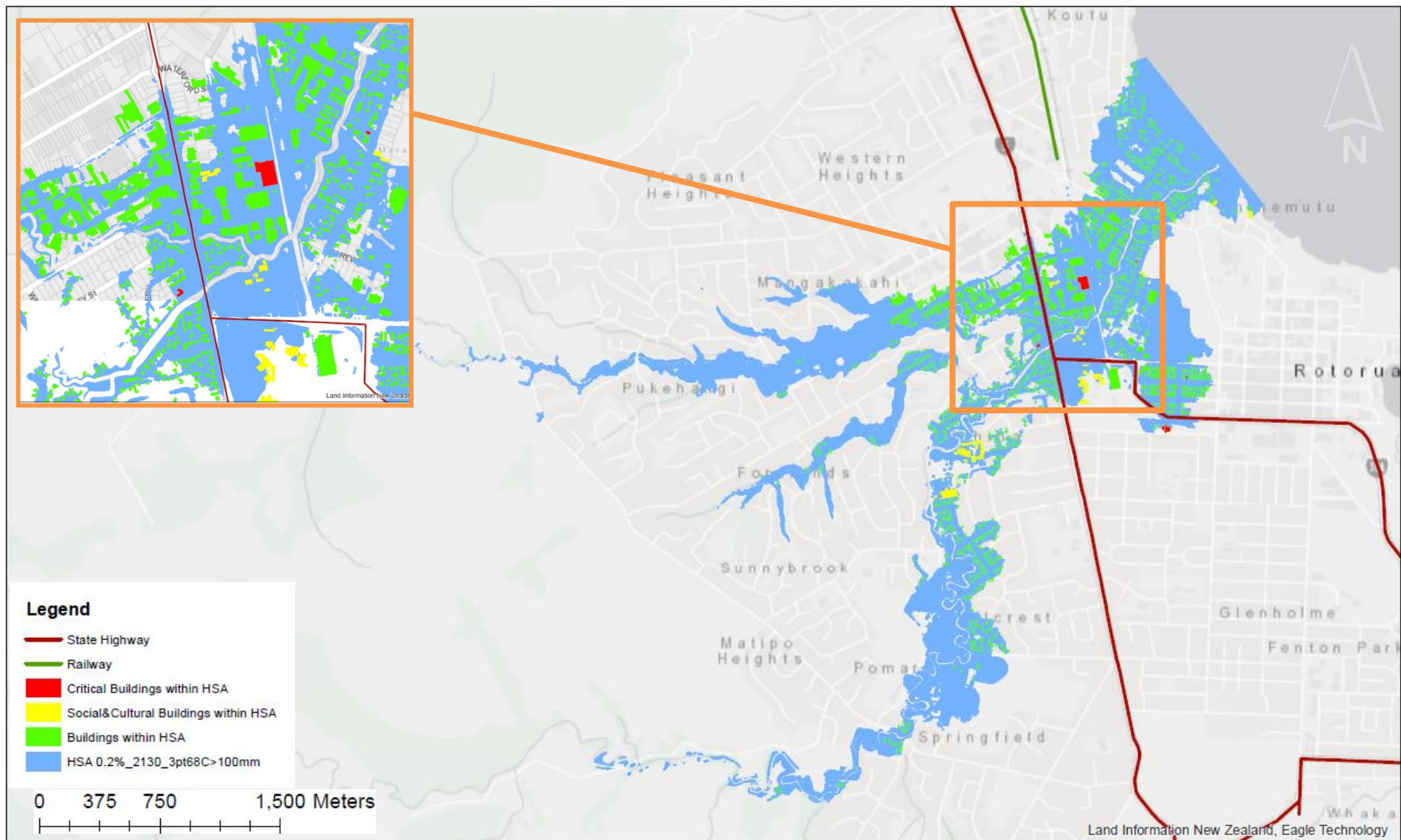


Figure 27: Hazard Susceptibility Area (fluvial flooding only) > 100mm peak during 0.2% AEP 2130 – existing urban environment

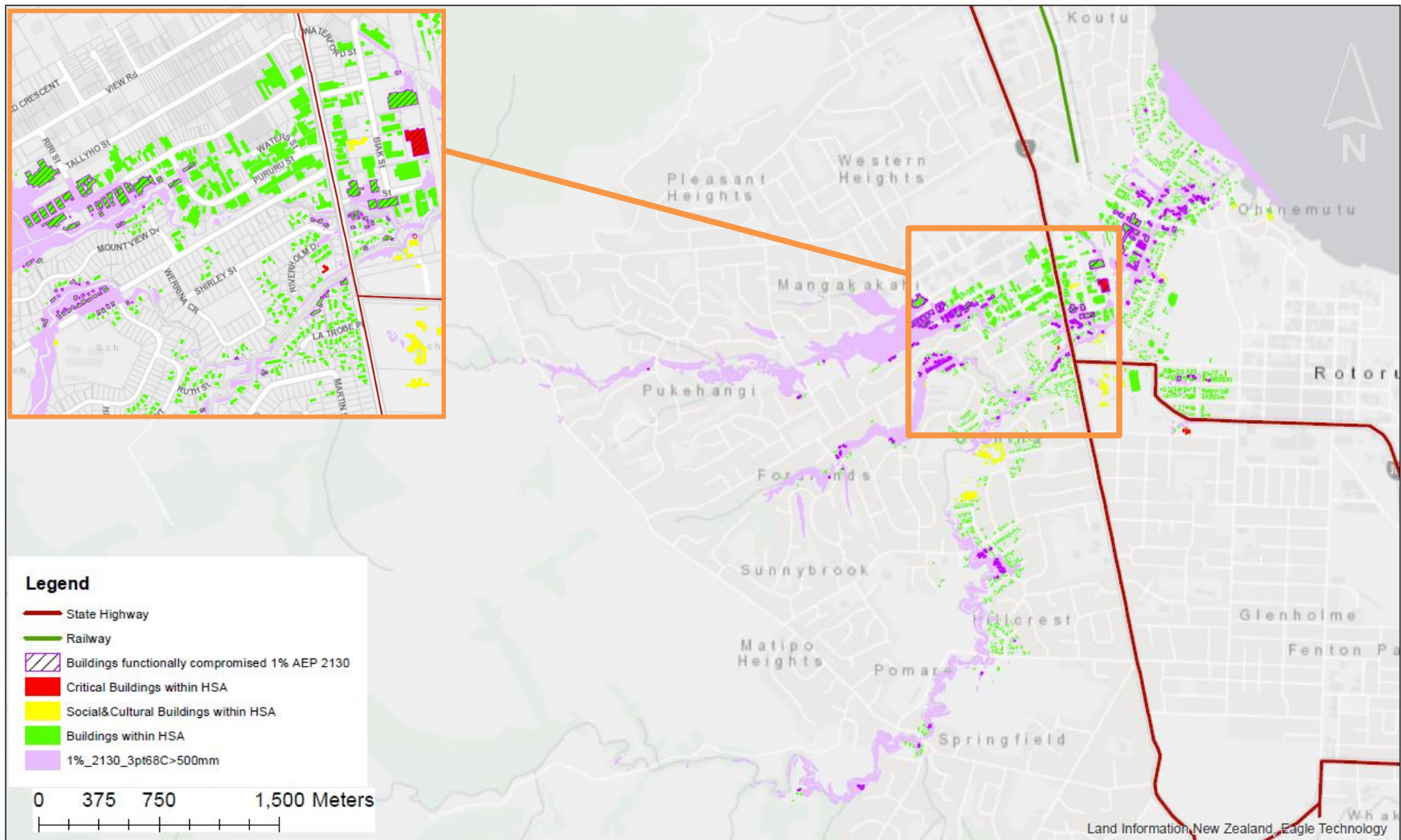


Figure 28: Primary Hazard Analysis Area (fluvial flooding only) > 500mm peak during 1% AEP 2130 – existing urban environment



Figure 29: 1% AEP 2130 – existing urban environment – industrial zone

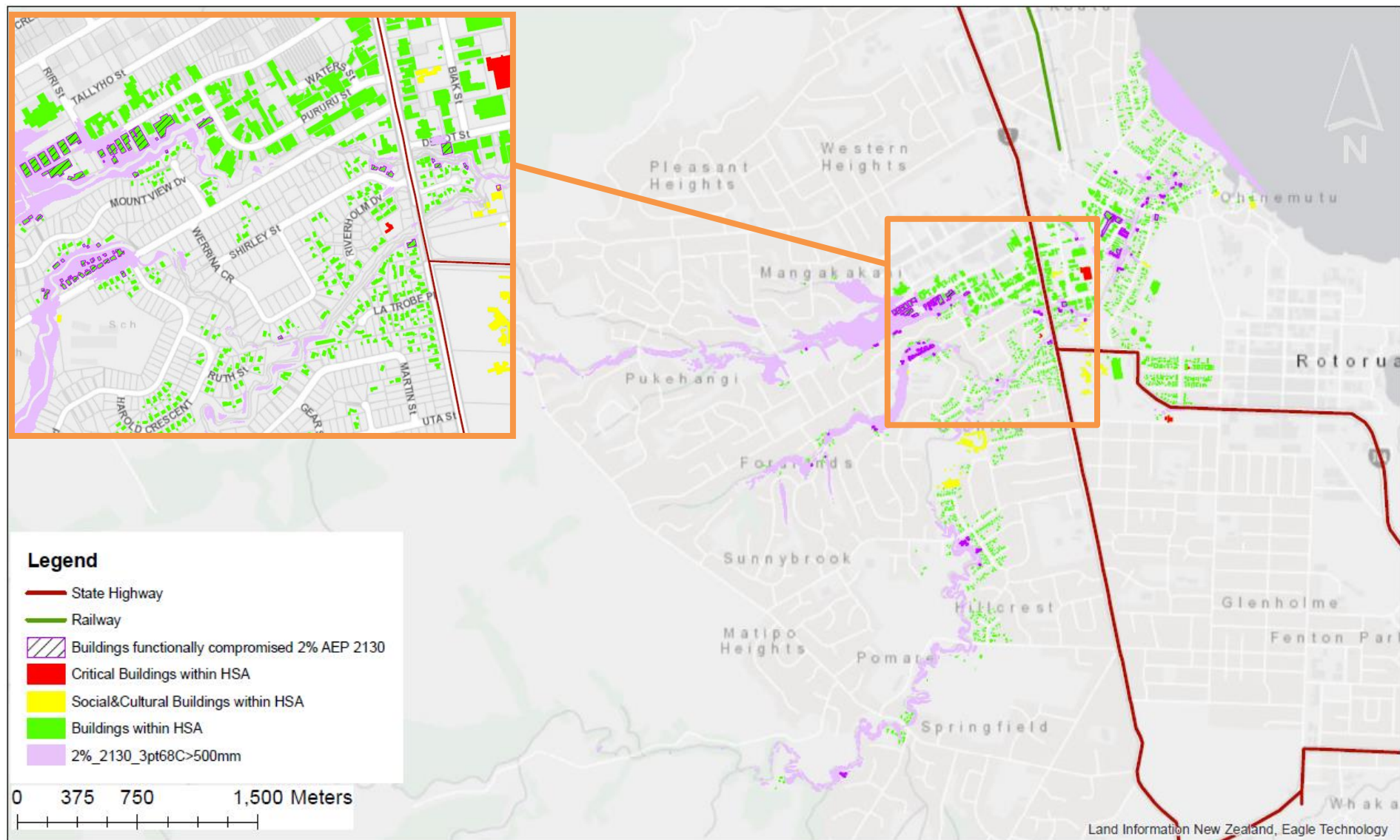


Figure 30: Secondary Hazard Analysis Area (fluvial flooding only) > 500mm peak during 2% AEP 2130 – future urban environment

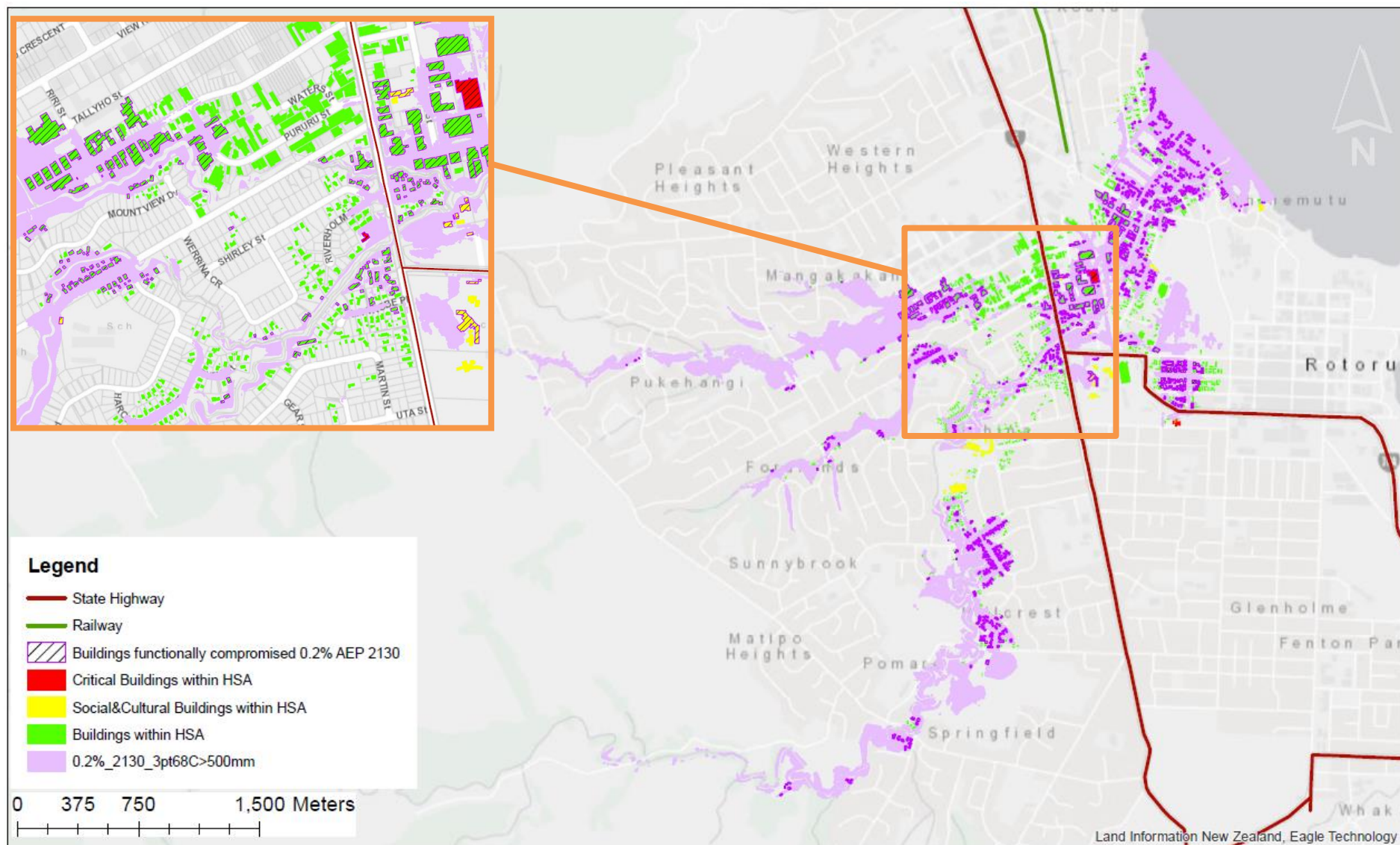


Figure 31: Secondary Hazard Analysis Area (fluvial flooding only) > 500mm peak during 0.2% AEP 2130 – future urban environment

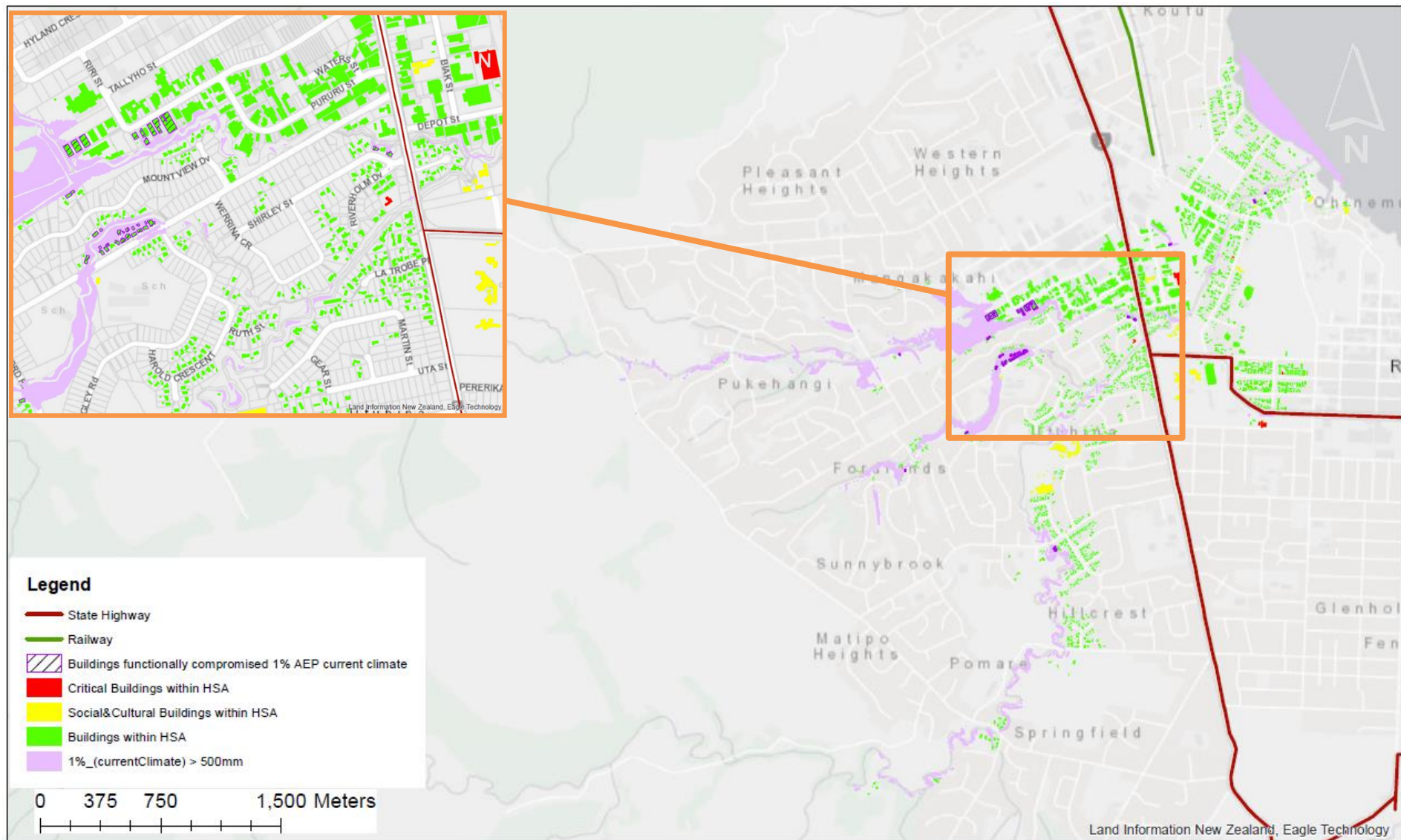


Figure 32: Primary Hazard Analysis Area (fluvial flooding only) > 500mm peak during 1% AEP 2020 – existing urban environment

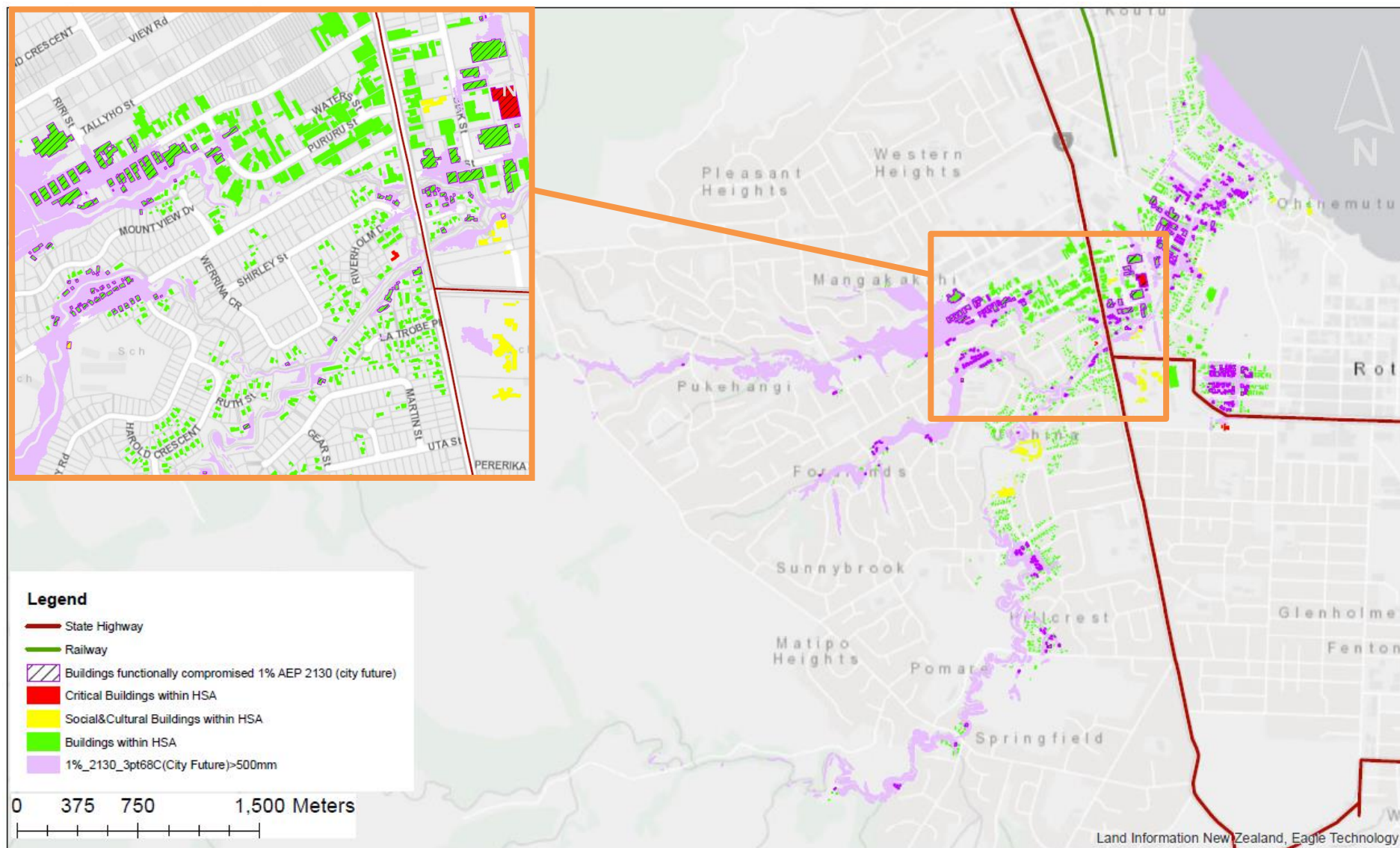


Figure 33: Primary Hazard Analysis Area (fluvial flooding only) > 500mm peak during 1% AEP 2130 – future urban environment

HSA - area covered in flooding greater than 100mm during the 0.2% City Now 2130

City Now with 100yr Climate Change (+10yr plan timeframe)

Functionally compromised building counts for different events (2130 Climate + existing urban environment)

Finished Floor Level On Piles*					50 year	Finished Floor Level On Piles*				100 year	Finished Floor Level On Piles*				500 year
50yr 2130 > 0.5m					Likelihood >=2% AEP	100yr 2130 > 0.5m				Likelihood <2-1% AEP	500yr 2130 > 0.5m			Likelihood <1-0.1	
Building Type	Total No. in HSA	No.	% compromised	Consequence Level	Risk Level	No.	% compromised	Consequence Level	Risk Level	No.	% compromised	Consequence Level	Risk Level	Overall Risk	
miscellaneous buildings	1687	111	6.58%	minor	medium	241	14.29%	moderate	medium	865	51.27%	catastrophic	high	high	
social/cultural buildings	46	3	6.52%	moderate	medium	4	8.70%	moderate	medium	16	34.78%	catastrophic	high		
critical buildings	6	0	0.00%	insignificant	low	1	16.67%	major	medium	3	50.00%	catastrophic	high		

* count will under predict in industrial areas where slab on ground is more likely

Figure 34: Risk Assessment Overview - Primary and Secondary Hazard Analysis 2130 (fluvial flooding only)

HSA - area covered in flooding greater than 100mm during the 0.2% City Now 2130

City Now with current climate

Functionally compromised building counts for different events (Current Climate + existing urban environment)

		Finished Floor Level On Piles *			100 year	Overall Risk
		100yr 2020 > 0.5m			Likelihood <2-1% AEP	
Building Type	Total No. in HSA	No.	% compromised	Consequence Level	Risk Level	
miscellaneous buildings	1687	44	2.61%	minor	low	low
social/cultural buildings	46	1	2.17%	minor	low	
critical buildings	6	0	0.00%	insignificant	low	

City Now with 100yr Climate Change (+10yr plan timeframe)

Functionally compromised building counts for different events (2130 Climate + existing urban environment)

		Finished Floor Level On Piles*			100 year	Overall Risk
		100yr 2130 > 0.5m			Likelihood <2-1% AEP	
Building Type	Total No. in HSA	No.	% compromised	Consequence Level	Risk Level	
miscellaneous buildings	1687	241	14.29%	moderate	medium	medium
social/cultural buildings	46	4	8.70%	moderate	medium	
critical buildings	6	1	16.67%	major	medium	

City Future with 100yr Climate Change (+10yr plan timeframe)

Functionally compromised building counts for different events (2130 Climate + future urban environment)

HSA (worst case)		Finished Floor Level On Piles*			100 year	Overall Risk
		100yr 2130 > 0.5m			Likelihood <2-1% AEP	
Building Type	Total No. in HSA	No.	% compromised	Consequence Level	Risk Level	
miscellaneous buildings	1687	271	16.06%	moderate	medium	high
social/cultural buildings	46	5	10.87%	moderate	medium	
critical buildings	6	2	33.33%	catastrophic	high	

* count will under predict in industrial areas where slab on ground is more likely

Figure 35: Risk Assessment Overview – Comparative Primary Hazard Analysis (fluvial flooding only)

	Consequences				
Likelihood (ARI - years)	Insignificant	Minor	Moderate	Major	Catastrophic
≥ 2	low	medium	medium	high	high
$<2-1$	low	low	medium	medium	high
$<1-0.1$	low	low	medium	medium	high
$<0.1-0.04$	low	low	low	low	medium
<0.04	low	low	low	low	medium

0.2% AEP = 1 in 500 year event
 1% AEP = 1 in 100 year event
 2% AEP = 1 in 50 year event
 5% AEP = 1 in 20 year event
 10% AEP = 1 in 10 year event
 20% AEP = 1 in 5 year event
 50% AEP = 1 in 2 year event
 100% AEP = Happens every year

Secondary Analysis
 Primary Analysis
 Secondary Analysis

Quantitative analysis of consequence

Table 21 Consequence table with qualitative and quantitative descriptions.

Consequence level	Built			Lifelines utilities	Health & safety
	Social/cultural	Buildings	Critical buildings		
Catastrophic	$\geq 25\%$ of buildings of social/cultural significance within hazard assessment area have functionality compromised.	$\geq 50\%$ of buildings within hazard assessment area have functionality compromised.	$\geq 25\%$ of critical buildings within hazard assessment area have functionality compromised.	A lifeline utility service is out for > 1 month (affecting $\geq 20\%$ of the town/city population) OR out for > 6 months (affecting $\leq 20\%$ of the town/city population).	> 101 dead and/or > 1001 injured
Major	11–24% of buildings of social/cultural significance within hazard assessment area have functionality compromised.	21–49% of buildings within hazard assessment area have functionality compromised.	11–24% of critical buildings within hazard assessment area have functionality compromised.	A lifeline utility service is out for 1 week – 1 month (affecting $\geq 20\%$ of the town/city population) OR out for 6 weeks to 6 months (affecting $< 20\%$ of the town/city population).	11–100 dead and/or 101–1000 injured
Moderate	6–10% of buildings of social/cultural significance within hazard assessment area have functionality compromised.	11–20% of buildings within hazard assessment area have functionality compromised.	6–10% of critical buildings within hazard assessment area have functionality compromised.	A lifeline utility service is out for 1 day to 1 week (affecting $\geq 20\%$ of the town/city population) OR out for 1 week to 6 weeks (affecting $\leq 20\%$ of the town/city population).	2–10 dead and/or 11–100 injured
Minor	1–5% of buildings of social/cultural significance within hazard assessment area have functionality compromised.	2–10% of buildings within hazard assessment area have functionality compromised.	1–5% of critical buildings within hazard assessment area have functionality compromised.	A lifeline utility service is out for 2 hours to 1 day (affecting $\geq 20\%$ of the town/city population) OR out for 1 day to 1 week (affecting $\leq 20\%$ of the town/city population).	≤ 1 dead and/or 1–10 injured
Insignificant	No buildings of social/cultural significance within hazard assessment area have functionality compromised.	$< 1\%$ of buildings within hazard assessment area have functionality compromised.	No damage within hazard assessment area, fully functional.	A lifeline utility service is out for up to 2 hours (affecting $\geq 20\%$ of the town/city population) OR out for up to 1 day (affecting $\leq 20\%$ of the town/city population).	No dead and/or No injured

NB for the purpose of Table 21:

- the term "town/city population" means the catchment of people within the hazard assessment area that is served by the lifeline utility, except that with respect to a lifeline utility that predominantly or exclusively serves a population outside the hazard assessment area, it means the population in the area served by the lifeline utility.
- the applicable consequence level will be the one that corresponds to the row that represents the highest measured or estimated consequence.

Figure 36: Risk Assessment Overview – Risk Matrix and Consequence Table



Figure 37: Hazard Vulnerability Classification DxV 1% AEP 2020 pre-development – existing urban environment

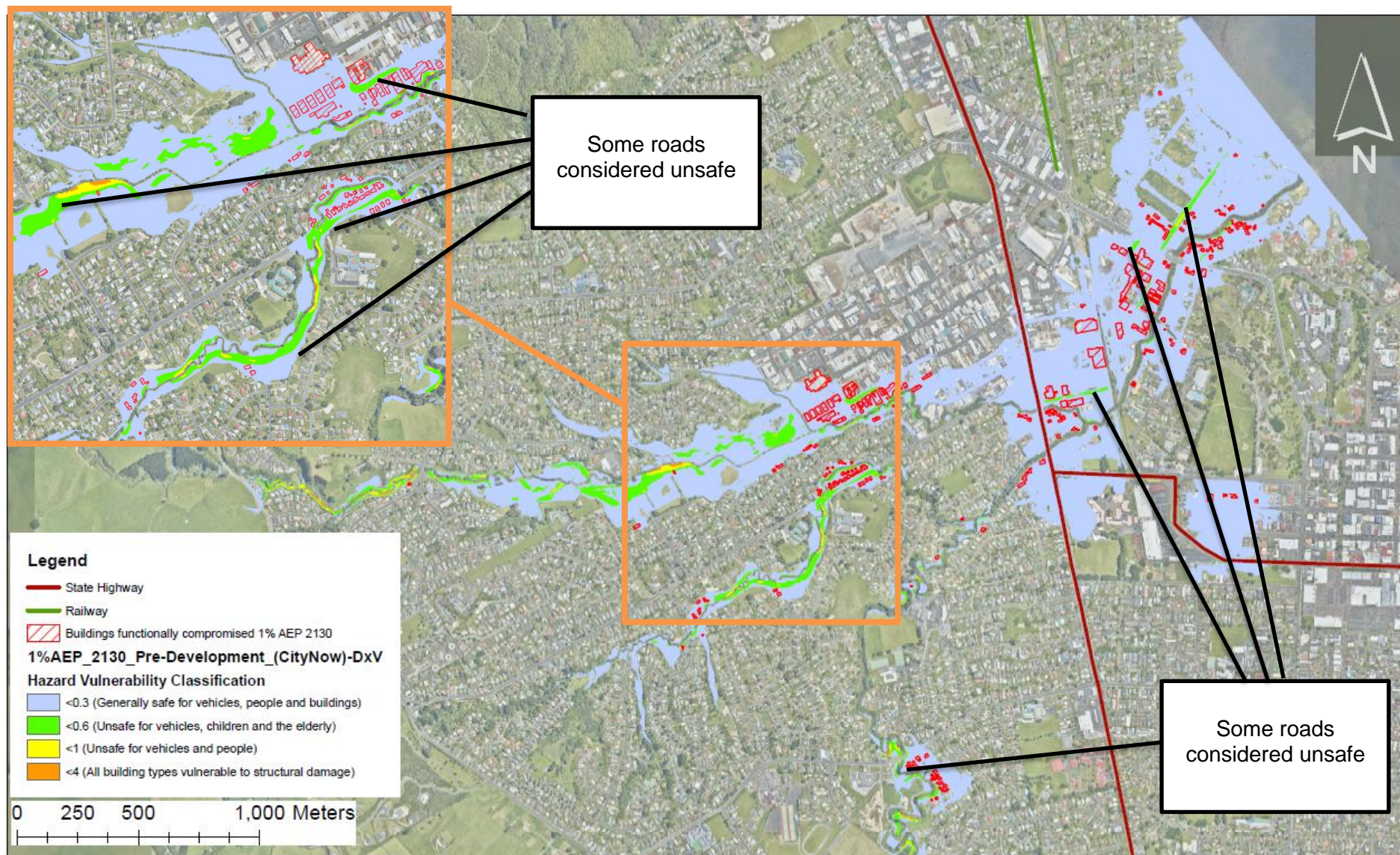


Figure 38: Hazard Vulnerability Classification DxV 1% AEP 2130 pre-development – existing urban environment

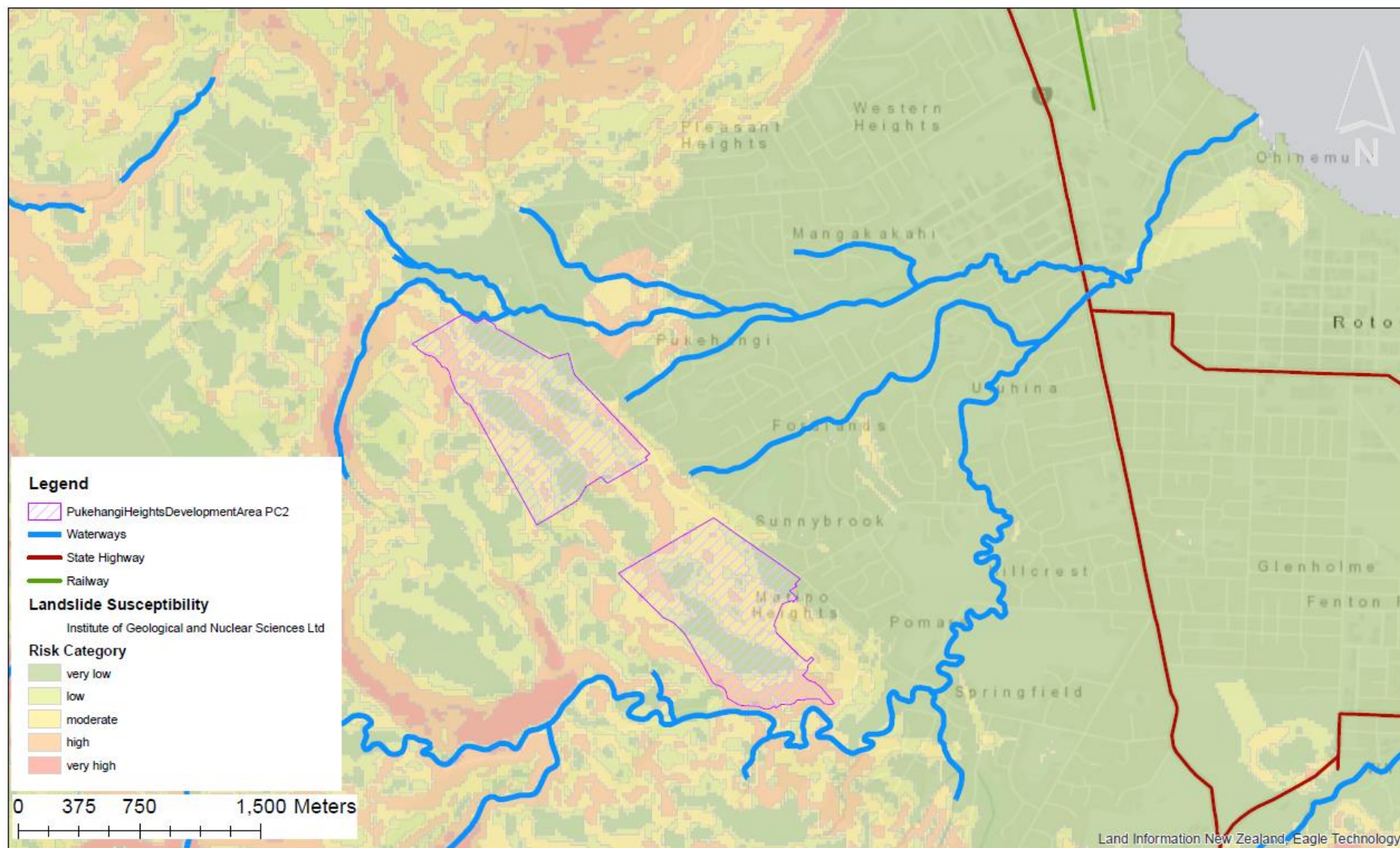


Figure 39: Landslide Susceptibility

Overview of Post Development Impact

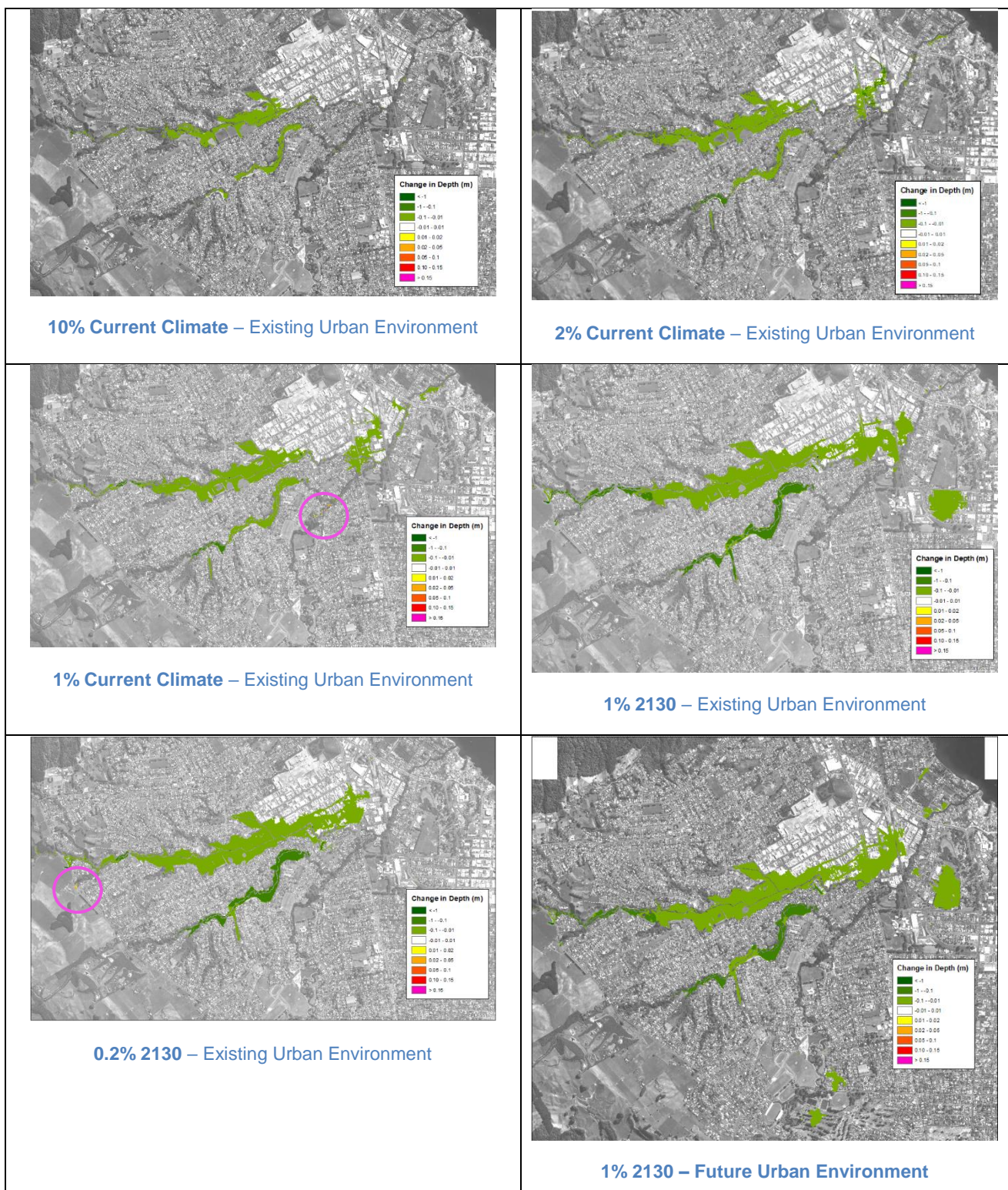


Figure 40: GUCM Scenario 15 Depth Impact

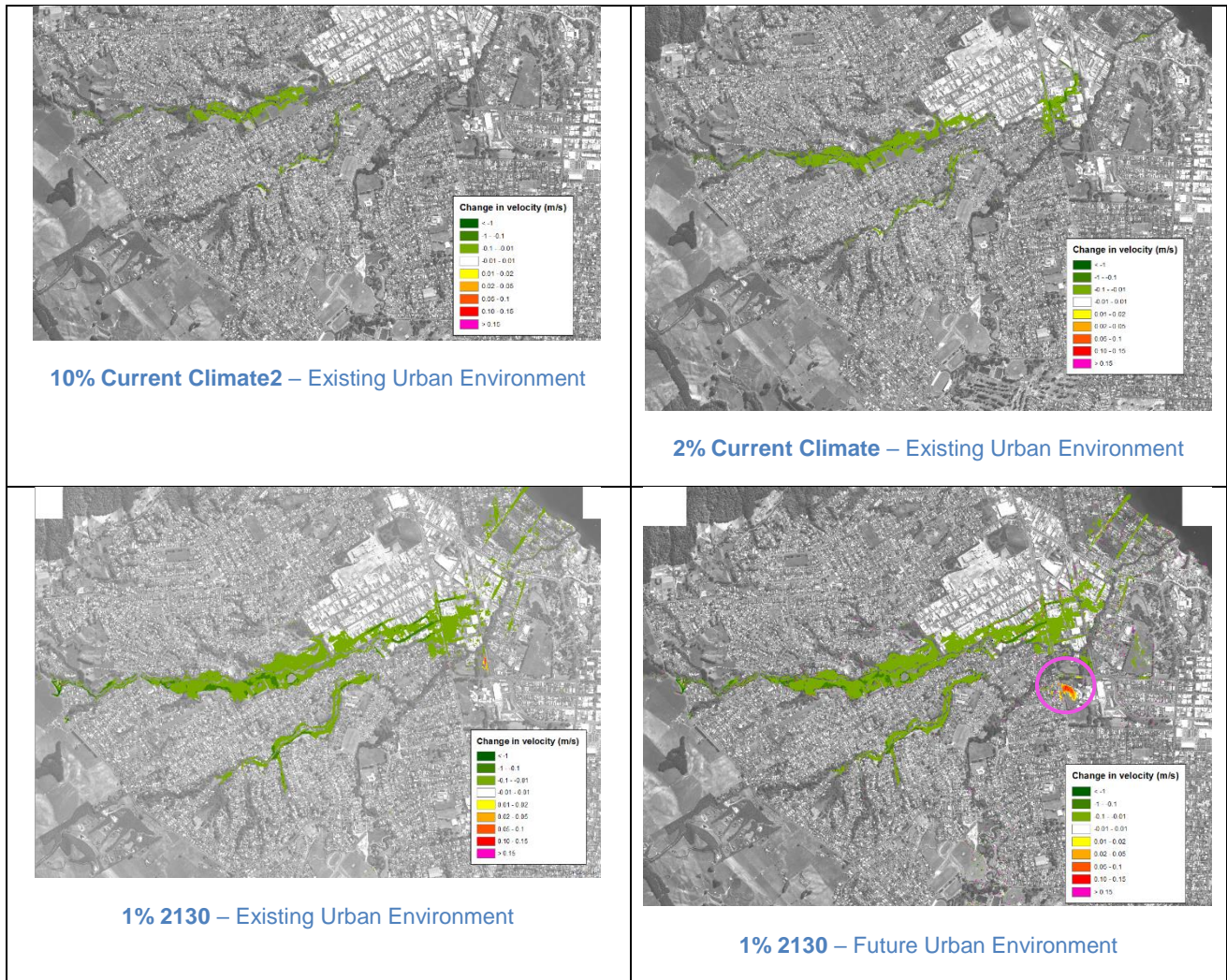


Figure 41: GUCM Scenario 15 Velocity Impact

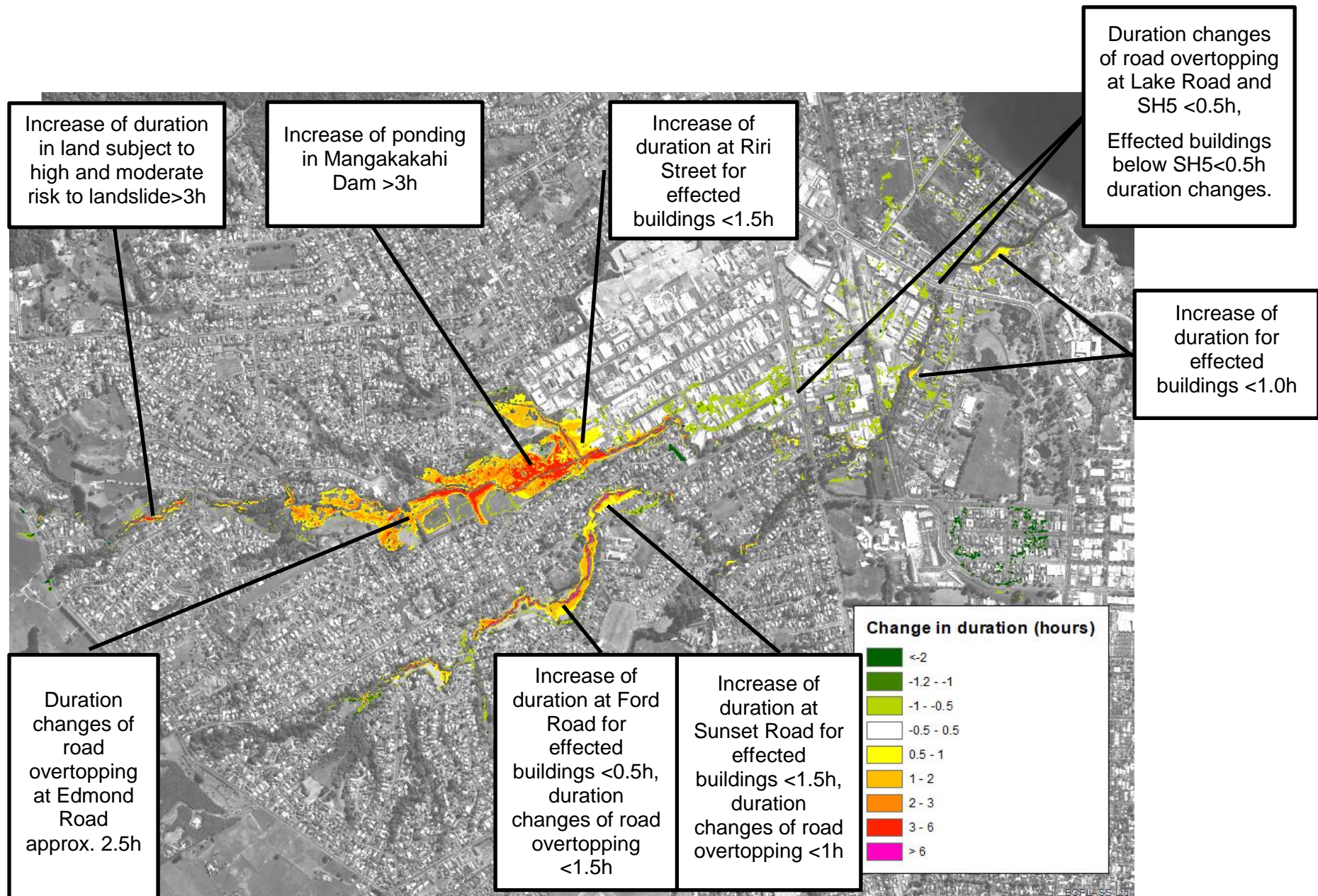


Figure 42: GUCM 1% 2130 – Existing Urban Environment Scenario 15 Duration Impact



Figure 43: Hazard Vulnerability Classification DxV 1% AEP 2020 post-development – existing urban environment

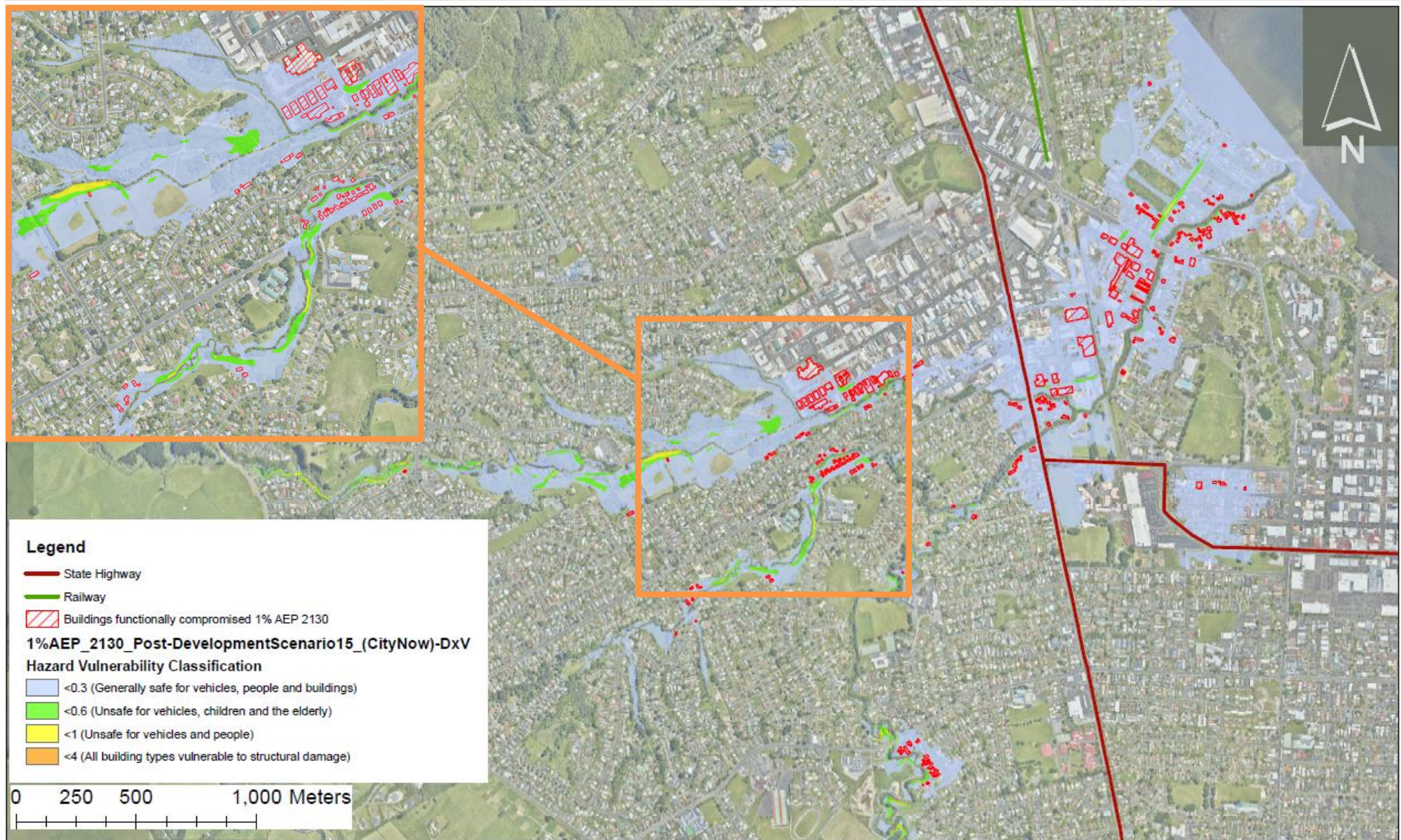


Figure 44: Hazard Vulnerability Classification DxV 1% AEP 2130 post-development – existing urban environment

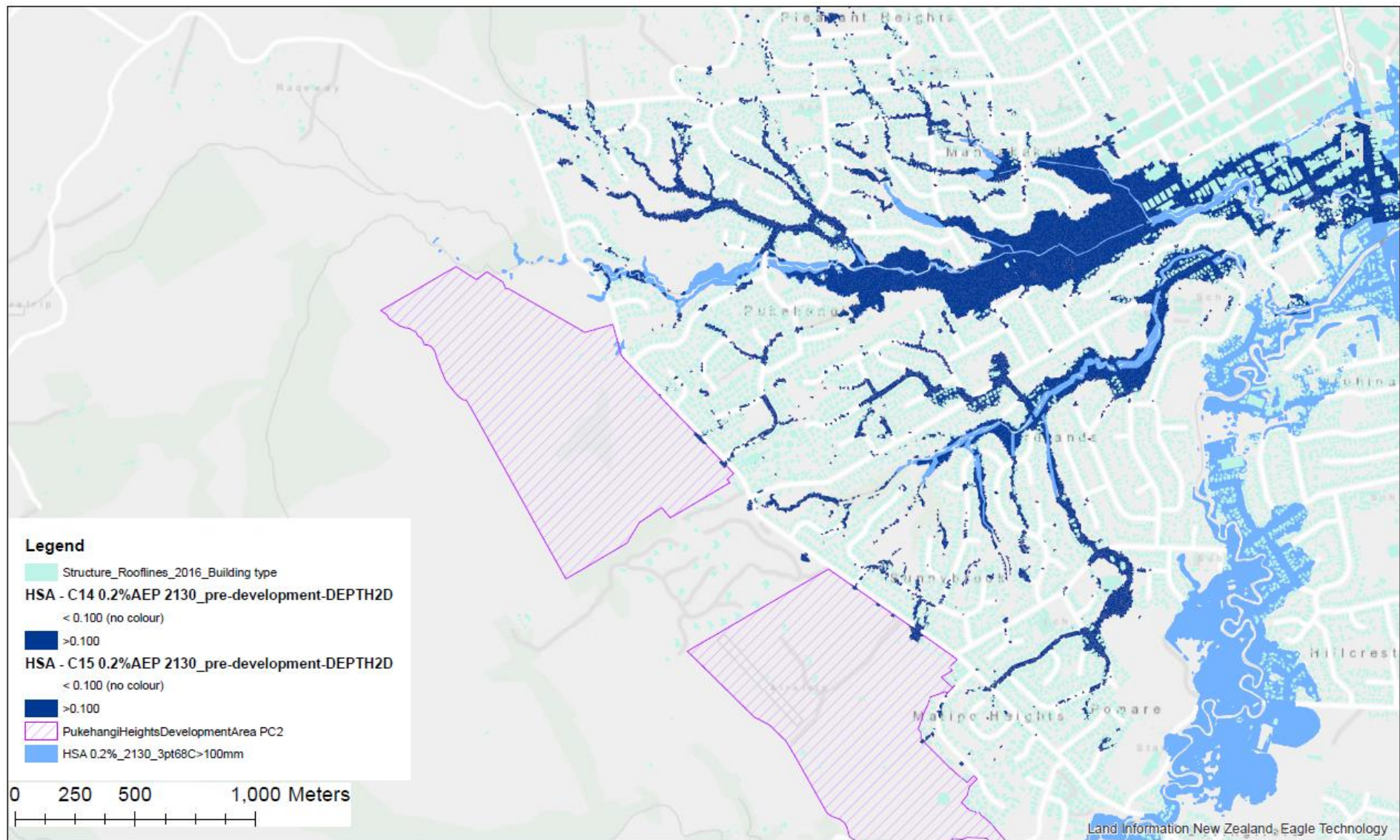


Figure 45: HSA 0.2% AEP 2130 >100mm pre- development flood extent– existing urban environment



Figure 46: HSA 0.2% AEP 2130 >100mm pre- development flood extent– existing urban environment- Immediately Downstream of PC2

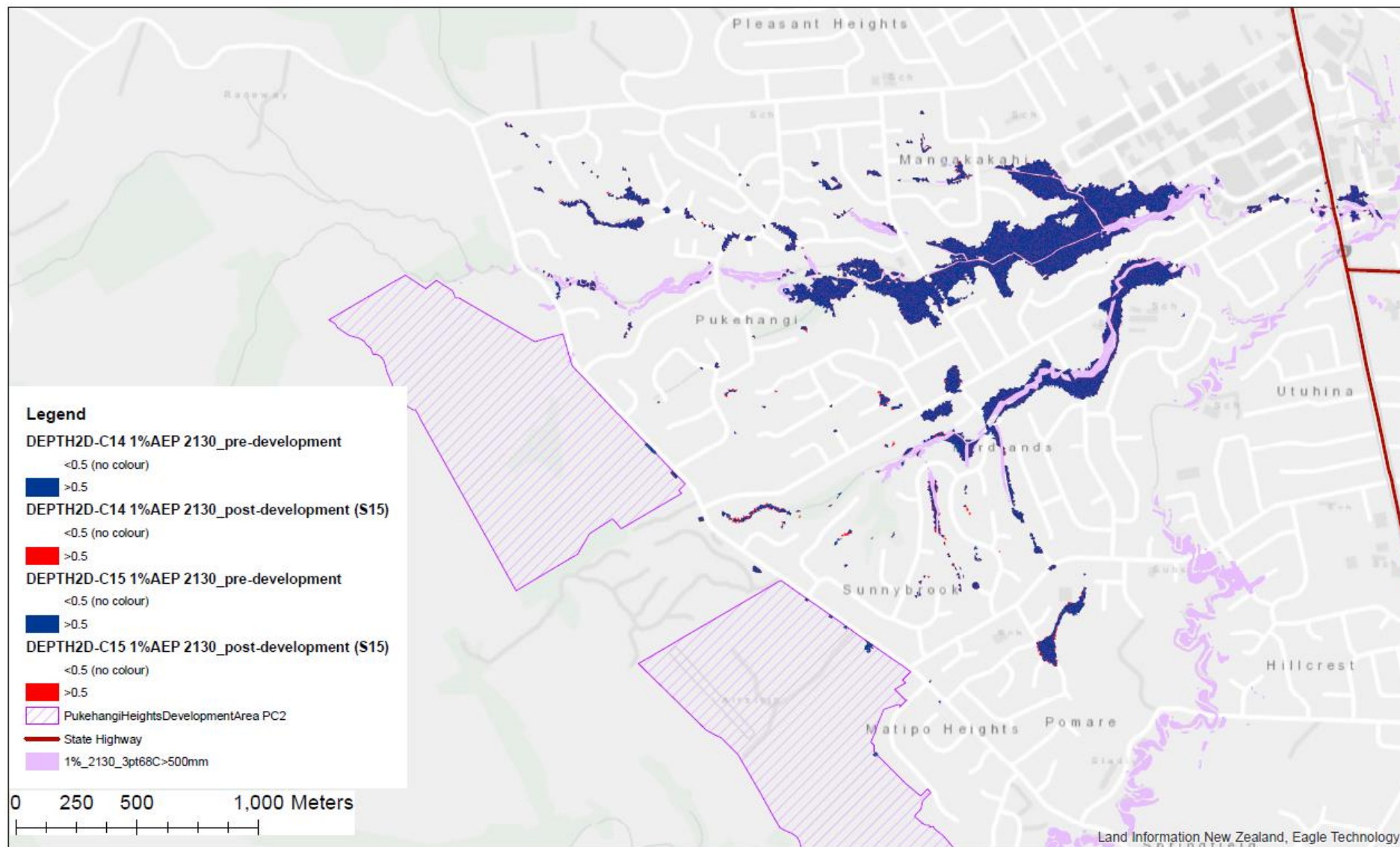


Figure 47: 1% AEP 2130 >500mm pre- and post-development flood extent– existing urban environment

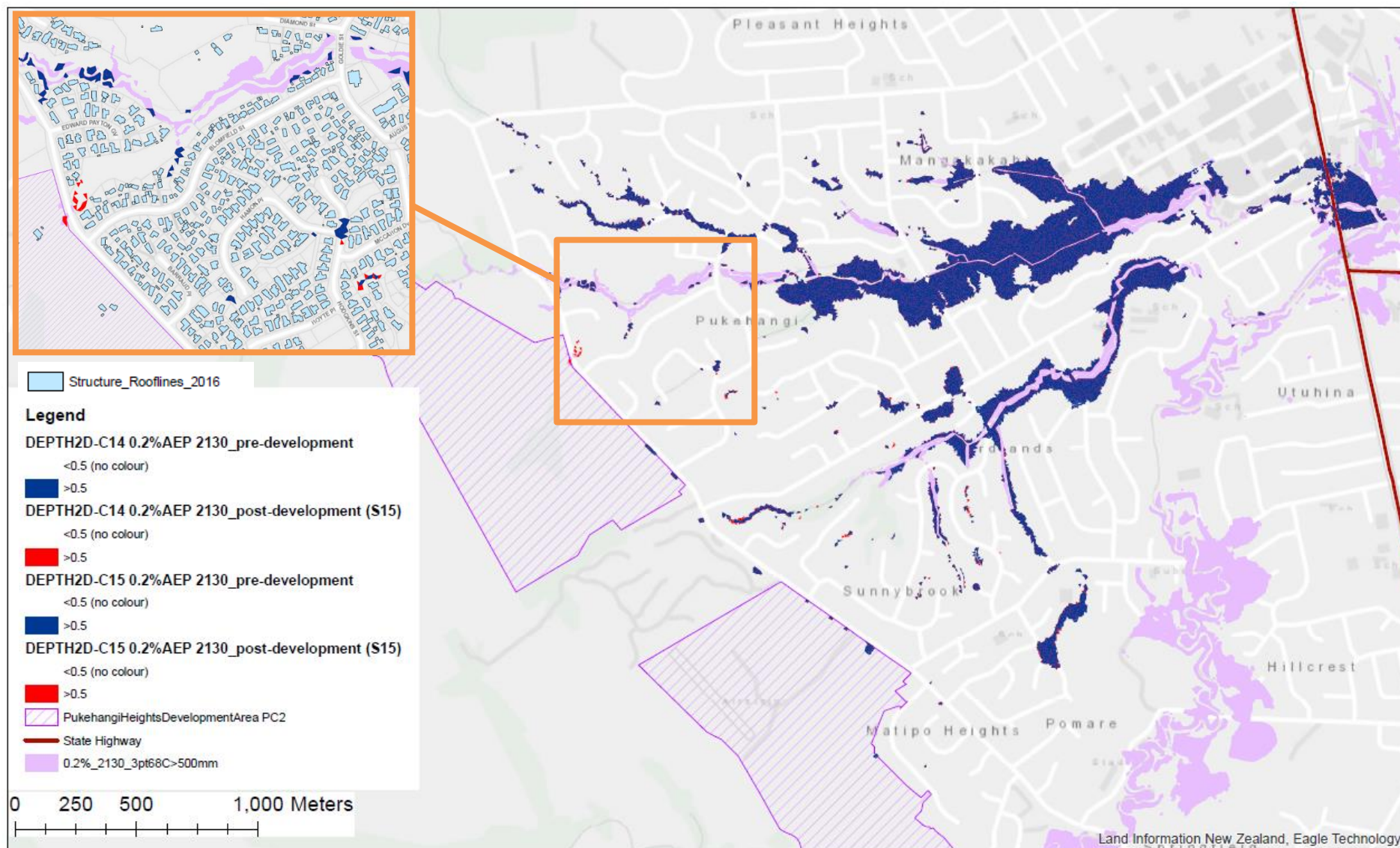


Figure 48: 0.2% AEP 2130 >500mm pre- and post-development flood extent– existing urban environment

Limitation on Addressing Existing Flood Risk

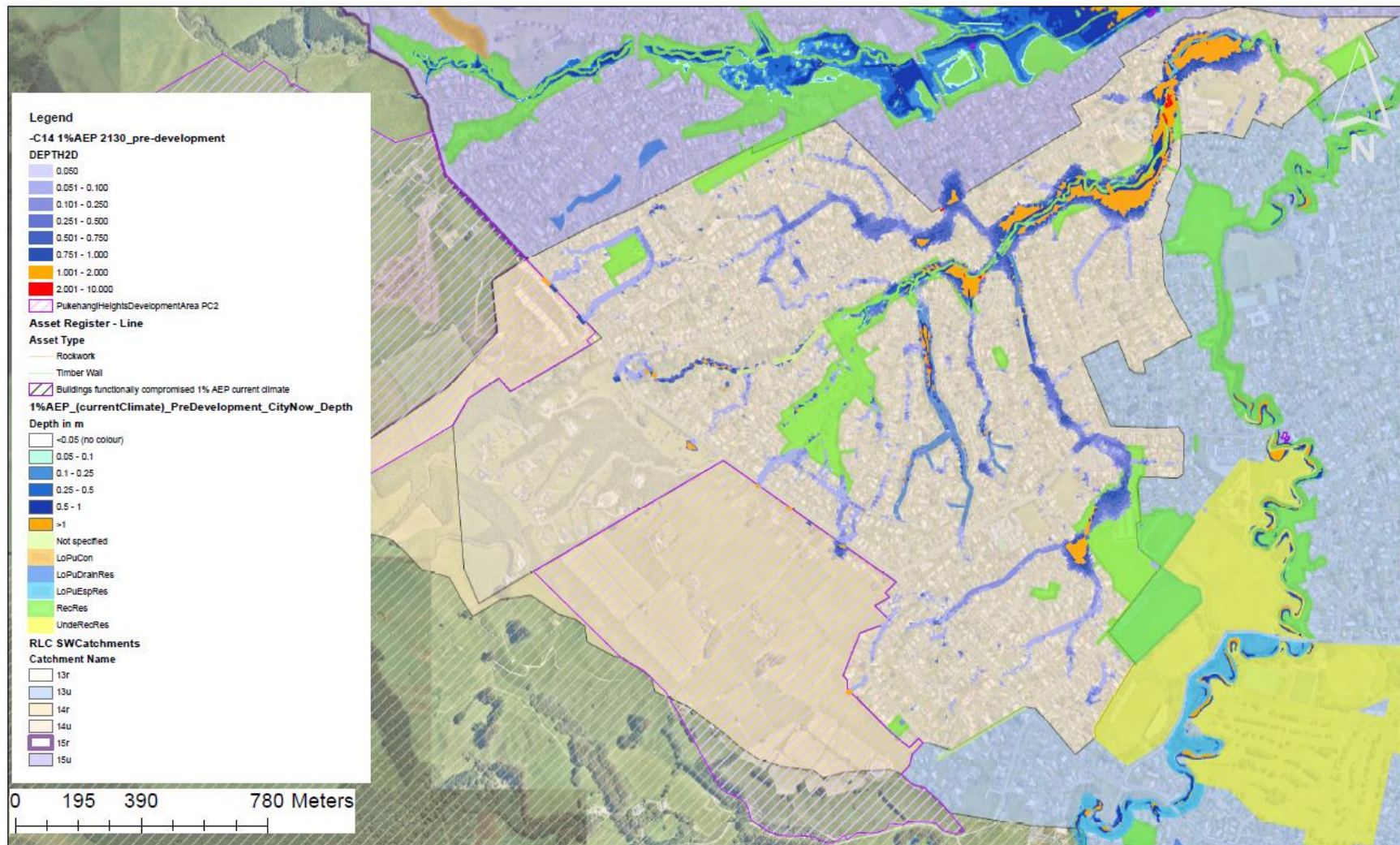


Figure 49: Otamatea – limited offside mitigation option

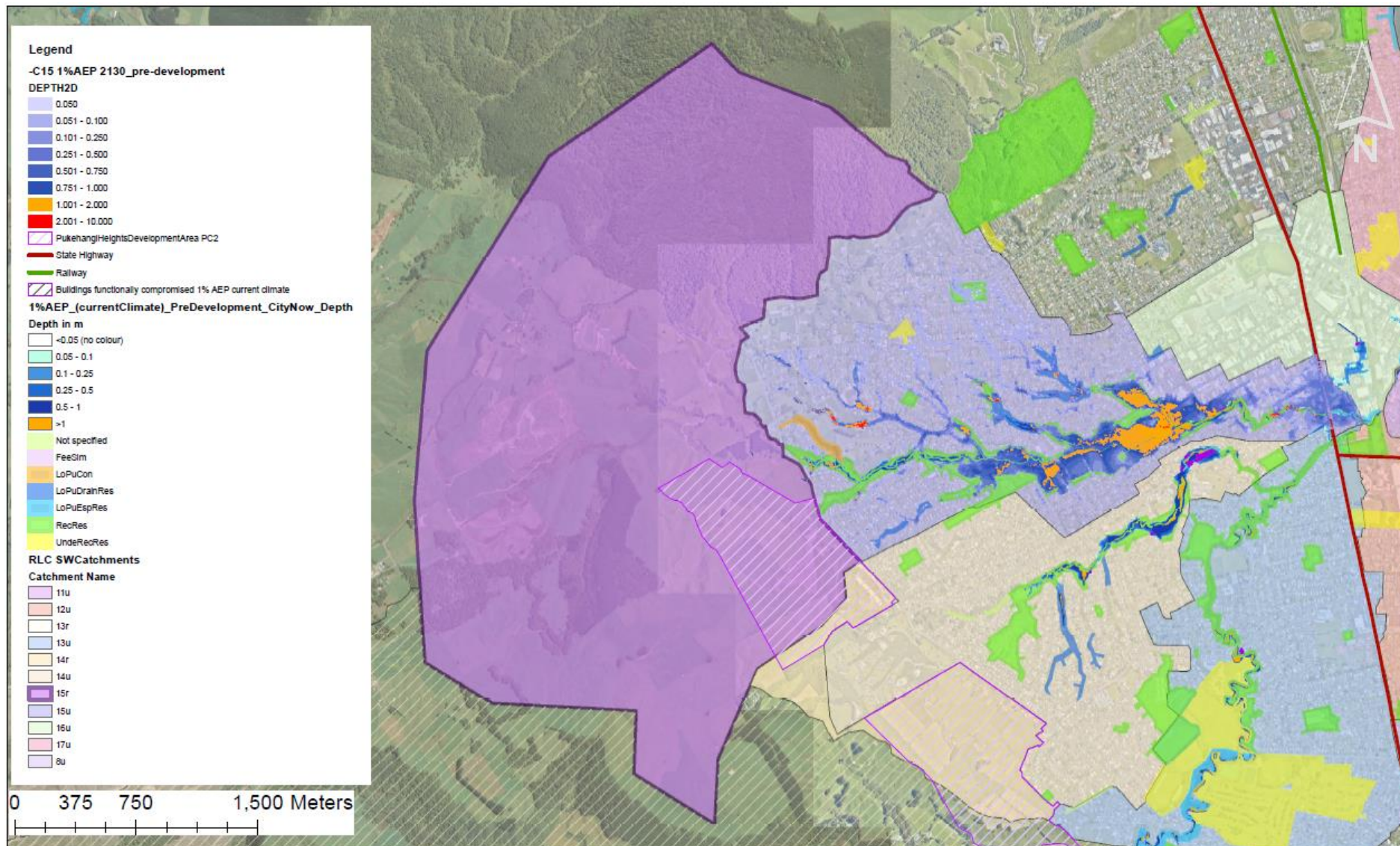


Figure 50: Mangakakahi– limited offside mitigation option

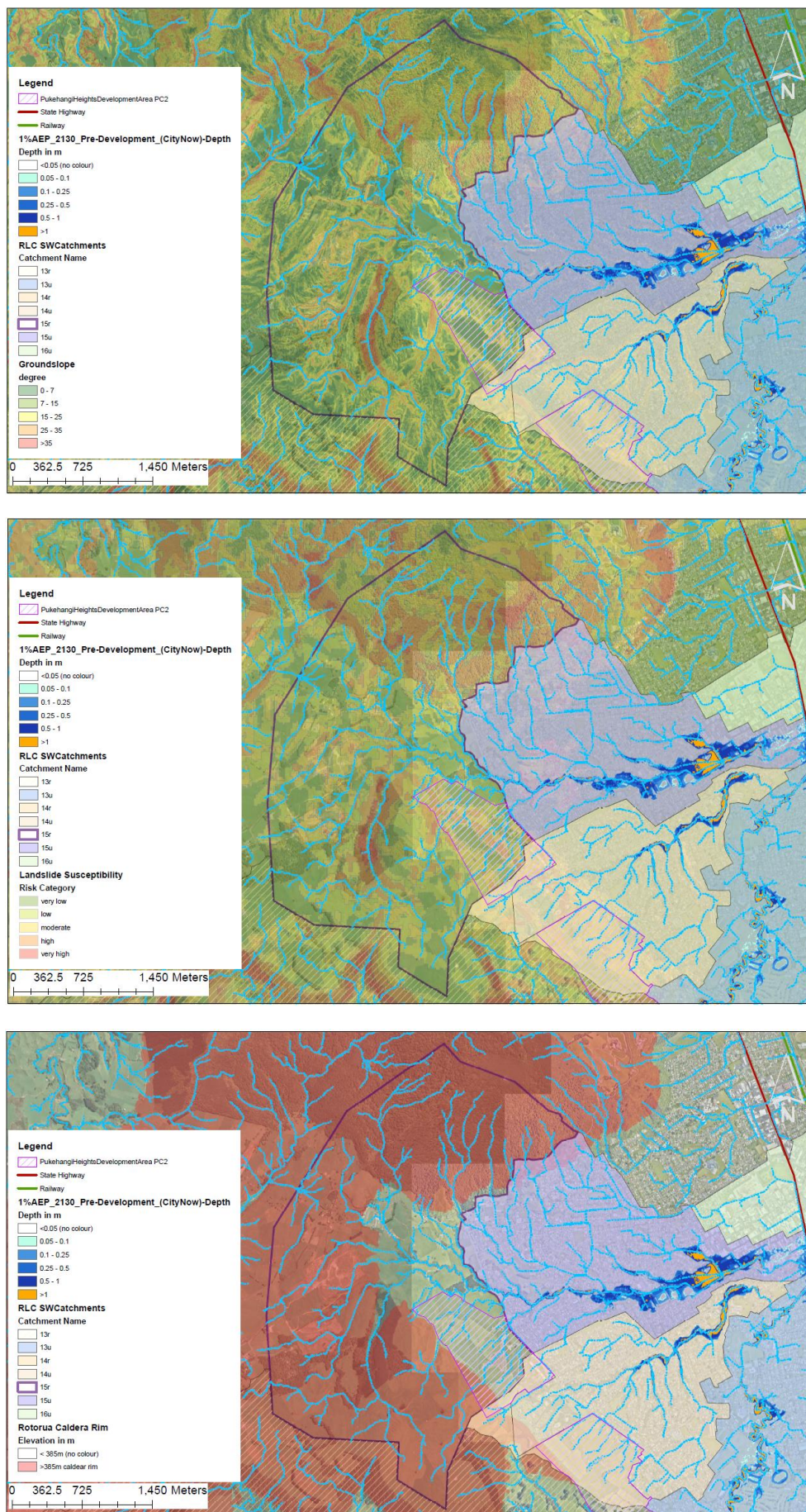


Figure 51: Mangakakahi– constraints/limited upstream mitigation opportunities