

Proposed Private District Plan Change 53

**190, 236 and 268 Stratton Street, Normandale
Rezoning to Rural Residential Activity Area**

Publicly Notified:

Tuesday, 14 January 2020

Submissions Close:

Wednesday, 12 February 2020

Part 1: Introduction

1. What is Proposed Private District Plan Change 53

On 8 November 2019, Urban Edge Planning Limited formally requested a change to the City of Lower Hutt District Plan. At its 10 December 2019 meeting, Hutt City Council ('Council') resolved to accept the plan change request and instructed officers to commence the plan change process for a private plan change, as set out in the First Schedule of the Resource Management Act 1991 ('the RMA').

The request and associated evaluation is included in Part 4 of this document.

2. What does Proposed Private District Plan Change 53 propose?

Proposed Private District Plan Change 53 ('the Proposed Plan Change') proposes to rezone 190, 236 and 268 Stratton Street, Normandale from the General Rural Activity Area to the Rural Residential Activity Area.

The purpose of the proposal is to provide for additional rural residential development at a scale similar to surrounding rural residential areas.

No changes to the objectives, policies or rules of the District Plan are proposed.

3. Structure of this document

This document contains five parts:

Part 1	Introduction
Part 2	Public Notice for the Proposed Plan Change
Part 3	Proposed Amendments to District Plan Maps
Part 4	Request and Section 32 Evaluation
Part 5	Submission Form

All five parts of this document are publicly available from Council, as detailed in the Public Notice for the Proposed Plan Change (Part 2 of this document).

3. The process for Proposed Private District Plan Change 53

The process for the Proposed Plan Change to date has been as follows:

8 November 2019	Request for the Proposed Plan Change received by Council from Urban Edge Planning Limited.
10 December 2019	Council formally accepts the plan change request, and instructs officers to commence the plan change process for a private plan change, as set out in the First Schedule of the RMA.
14 January 2020	Proposed Plan Change is publicly notified.

Upon notification of the Proposed Plan Change, all interested persons and parties have an opportunity to have input through the submissions process. The process for public participation in the consideration of the Proposed Plan Change under the RMA is as follows:

- The Proposed Plan Change is publicly notified and any member of the public may make a submission in support of or in opposition to the proposal. This submission phase is at least 20 working days from the date of the Public Notice.
- After the closing date for submissions, Council must prepare a summary of decisions requested. This summary must be publicly notified.
- Certain persons may make a further submission in support of, or in opposition to, the submissions already made. The further submission phase is 10 working days after the notification of the summary of decisions requested.
- If a person making a submission or further submission asks to be heard in support of their submission, a hearing must be held.
- Following the hearing, Council must give its decision on the Proposed Plan Change in writing (including its reasons for accepting or rejecting submissions).
- Any person who has made a submission has the right to appeal the Council decision on the Proposed Plan Change to the Environment Court.

Part 2: Public Notice

PUBLIC NOTICE

Public Notification of Proposed Private District Plan Change 53 to the City of Lower Hutt District Plan

Clause 5 and Clause 26 of the First Schedule of the Resource Management Act 1991

Proposed Private District Plan Change 53: 190, 236 and 268 Stratton Street, Normandale – Rezoning to Rural Residential Activity Area

Hutt City Council has accepted a request from Urban Edge Planning Limited for a proposed change to the City of Lower Hutt District Plan. The proposal is to rezone 190, 236 and 268 Stratton Street, Normandale from the General Rural Activity Area to the Rural Residential Activity Area.

No changes to the objectives, policies or rules of the District Plan are proposed.

The purpose of the proposal is to provide for additional rural residential development at a scale similar to surrounding rural residential areas.

Documentation for the proposed plan change can be viewed:

- On Council's website: www.huttcity.govt.nz/pc53,
- At all Hutt City Council libraries, and
- At the Customer Services Counter, Council Administration Building, 30 Laings Road, Lower Hutt.

Copies can also be requested by contacting Hutt City Council:

- Phone: 04 570 6666, or
- Email: district.plan@huttcity.govt.nz.

Any person may make a submission on the proposed plan change. However, if the person could gain an advantage in trade competition through the submission, then the person may do so only if the person is directly affected by an effect of the proposal that:

- Adversely affects the environment, and
- Does not relate to trade competition or the effects of trade competition.

Submissions close on Wednesday, 12 February 2020.

Submissions may be lodged in any of the following ways:

- Email: submissions@huttcity.govt.nz
- Post: District Plan Division, Hutt City Council, Private Bag 31912, Lower Hutt 5040
- In Person: Council Administration Building, 30 Laings Road, Lower Hutt

Submissions must be written on, or in accordance with, Form 5 of the Resource Management (Forms, Fees and Procedure) Regulations, and must include:

- Details on the specific provisions the submission relates to,
- Whether the specific provision is supported or opposed or proposed to be amended, with reasons, and
- Precise details on the decision that is sought from Council.

Submissions must also address potential trade competition advantages and state whether or not you wish to be heard in support of your submission.

Submission forms (Form 5) are available:

- On Council's website: www.huttcity.govt.nz/pc53,
- At all Hutt City Council libraries, and
- At the Customer Services Counter, Council Administration Building, 30 Laings Road, Lower Hutt.

Copies can also be requested by contacting Hutt City Council:

- Phone: 04 570 6666, or

- Email: district.plan@huttcity.govt.nz.

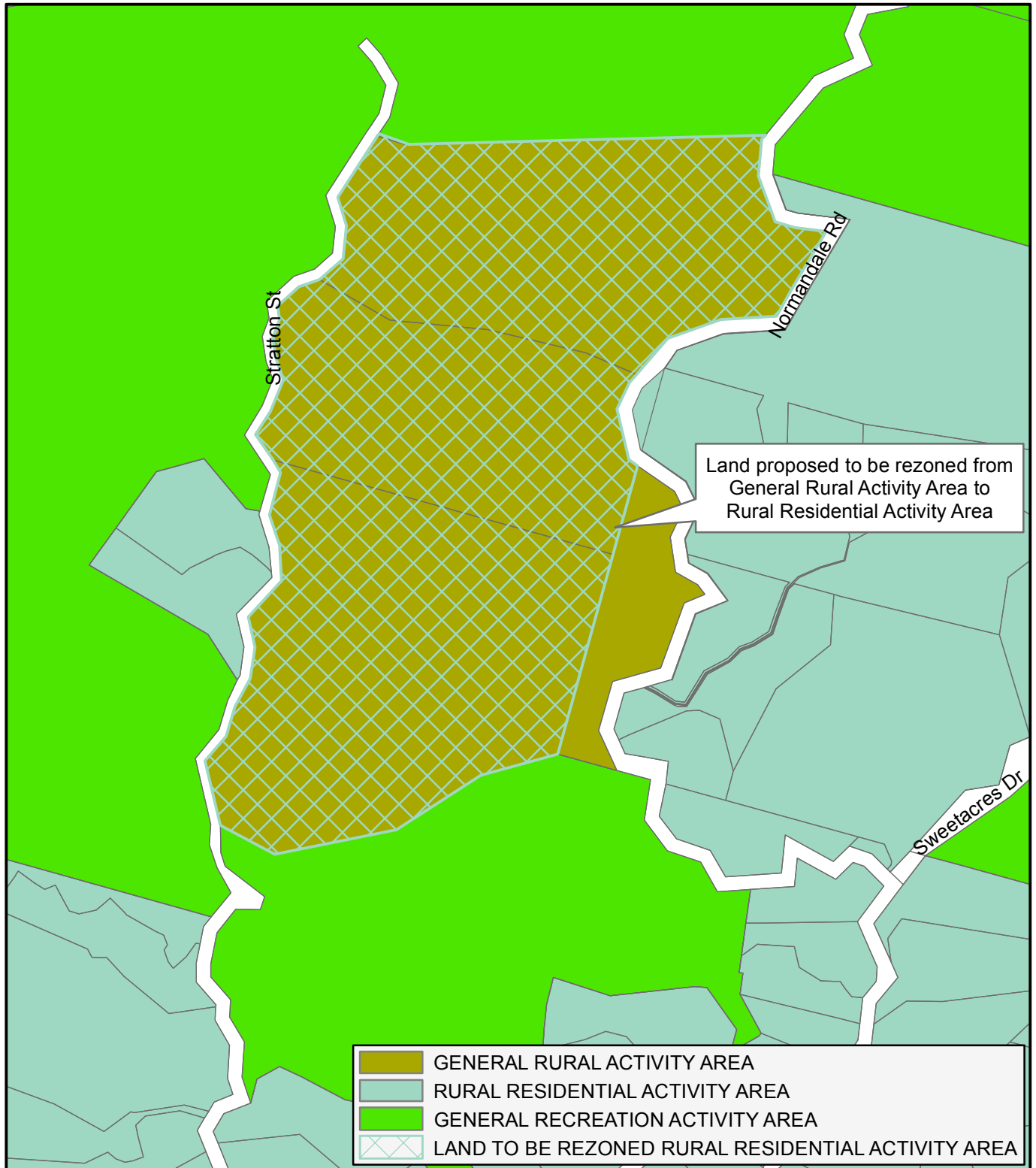
The process for public participation in the consideration of this proposal under the Resource Management Act is as follows:

- After the closing date for submissions, Hutt City Council must prepare a summary of decisions requested by submitters. This summary must be publicly notified.
- There must be an opportunity for the following persons to make a further submission in support of, or in opposition to, the submissions already made:
 - Any person representing a relevant aspect of the public interest.
 - Any person who has an interest in the proposal greater than the general public has.
 - The local authority itself.
- If a person making a submission asks to be heard in support of their submission, a hearing must be held.
- Hutt City Council must give its decision on the provisions and matters raised in the submissions (including its reasons for accepting or rejecting submissions) and give public notice of its decision within two years of notifying the proposal, and serve it on every person who made a submission.
- Any person who has made a submission has the right to appeal against the decision on the proposal to the Environment Court if:
 - In relation to a provision or matter that is the subject of the appeal, the person referred to the provision or matter in the person's submission on the proposal, and
 - In the case of a proposal that is a proposed policy statement or plan, the appeal does not seek the withdrawal of the proposal as a whole.

Please contact Nathan Geard (04 570 6996 or Nathan.Geard@huttcity.govt.nz) if you have any questions about the proposal.

Jo Miller
Chief Executive
14 January 2020

Part 3: Proposed Amendments to District Plan Maps

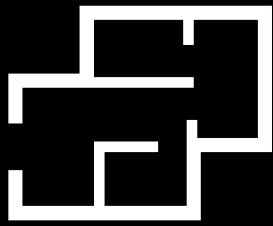


Proposed Private District Plan Change 53

190, 236 and 268 Stratton Street, Normandale

District Plan Maps B3 and R1

Part 4: Request and Section 32 Evaluation



URBANEDGE
P L A N N I N G L T D

Private Plan Change Request Section 32 Evaluation

**190, 236 AND 268 STRATTON STREET,
NORMANDALE - REZONING TO RURAL
RESIDENTIAL ACTIVITY AREA**

Date – 8 November 2019

Prepared for – Judy and Neville Bannister



PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

PART A: REQUEST FOR PRIVATE PLAN CHANGE

To: District Plan Team
Address: Hutt City Council
 Private Bag 31-912
 Lower Hutt 5040

Urban Edge Planning on behalf of Judy and Neville Bannister requests a District Plan Change to the Operative City of Lower Hutt District Plan under Schedule 1 Part 2 Clause 21 of the Resource Management Act 1991 (RMA):

Private Plan Change request for	190, 236 and 268 Stratton Street, Normandale – Rezoning to Rural Residential Activity Area
Brief description of the proposed Plan Change	The proposed Plan Change seeks the rezoning of three properties in Normandale from General Rural Activity Areas to Rural Residential Activity Area. No new provisions or amendments to existing provisions are proposed.
Applicant	Judy and Neville Bannister
Address for service	Urban Edge Planning Ltd PO Box 39071 Wellington Mail Centre Lower Hutt 5045
Address for invoices	As above

Urban Edge Planning attaches, in accordance with Schedule 1 Part 2 Clause 22 of the RMA 1991, a Section 32 Evaluation report.

Signature of applicant:



James Beban

Director / Planner

Urban Edge Planning

On behalf of Judy and Neville Bannister

8 November 2019

PART B: SECTION 32 EVALUATION

Section 32 Evaluation

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1. Introduction

- (1) The proposed Plan Change seeks to rezone the following properties from General Rural Activity Area to Rural Residential Activity Area under the City of Lower Hutt District Plan (the District Plan):
 - 190 Stratton Street (SEC 43 Normandale Sett Blk VII D3/922) – 20.28ha
 - 236 Stratton Street (LOT 1 DP 50184 20B/82) – 12.75ha
 - 268 Stratton Street (LOT 2 DP 50184 20B/83) – 16.77ha
- (2) The properties subject to this plan change (shown on the maps below) are located in the Western Hills of Lower Hutt. The overall area of land subject to this proposed Plan Change is 49.8 hectares and the land is held in three Records of Title.
- (3) The purpose of this plan change is to rezone the sites to Rural Residential Activity Area which would provide for additional rural residential development at a scale similar to surrounding rural residential areas.

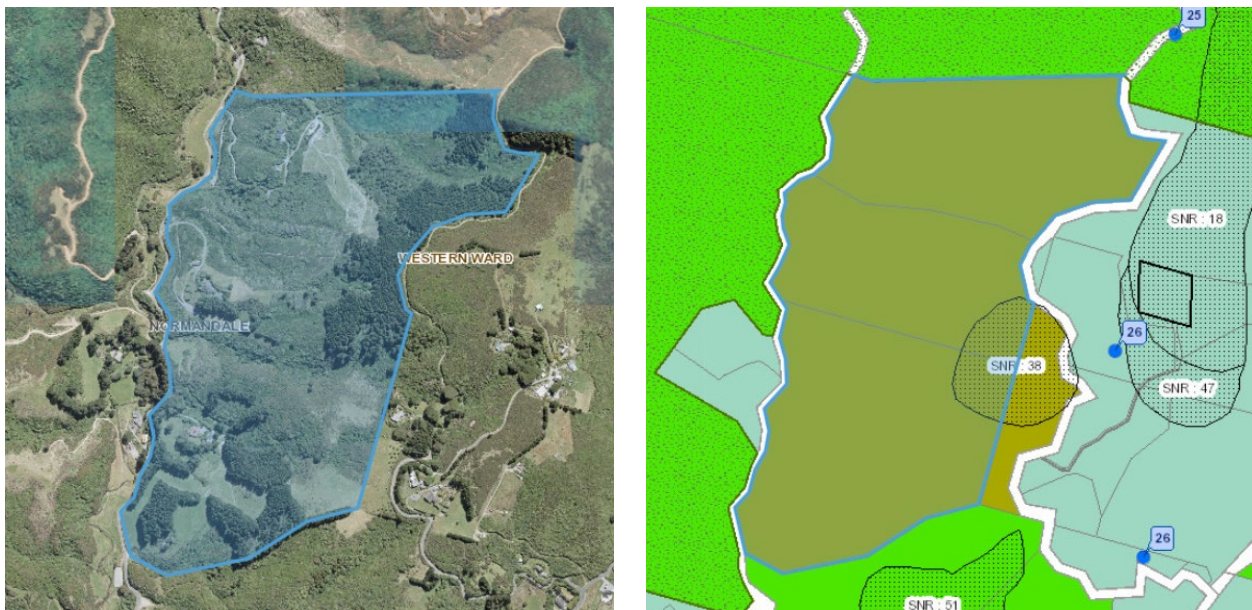


Figure 1 – Aerial image and District Plan Map of plan change sites. Source: HCC WebMap.

- (4) The proposed Plan Change does not seek the introduction of any new or changes to existing District Plan provisions including objectives, policies, rules or standards. The only amendments will be to District Plan Maps B3 and R1 to reflect the proposed zone change.
- (5) No new site specific rules are proposed. It is noted that a Significant Natural Resource (SNR 38 – Normandale Road Bush) partly affects two of the three properties. This SNR would not be affected by the proposed zone change.
- (6) This report has been prepared to address the relevant matters as identified in section 32 of the RMA. It is structured as follows:
 - Introduction
 - Statutory Basis for Section 32 Evaluation
 - Background

- Consultation
- National, Regional and Local Policy Framework
- Evaluation of Options
- Effects of the Proposed Plan Change;
- Conclusion; and
- Appendices.

2. Statutory Basis for Section 32 Evaluation

2.1 Section 32

- (7) The overarching purpose of Section 32 (s32) of the RMA is to ensure that any proposed District Plan provisions are robust, evidence-based and the best means to achieve the purpose of the RMA.
- (8) The Section 32 evaluation report provides the reasoning and rationale for the proposed provisions and should be read in conjunction with those provisions.
- (9) Section 32 of the RMA requires that an evaluation report be prepared before the notification of a plan change by Council. Sections 32 (1), (2), (3), (4) and (4A) provide guidance as to what such an evaluation must examine and consider as follows:
 - (1) *An evaluation report required under this Act must—*
 - (a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
 - (b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) *summarising the reasons for deciding on the provisions; and*
 - (c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
 - (2) *An assessment under subsection (1)(b)(ii) must—*
 - (a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - (i) *economic growth that are anticipated to be provided or reduced; and*
 - (ii) *employment that are anticipated to be provided or reduced; and*
 - (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
 - (3) *If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed*

or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

- (a) the provisions and objectives of the amending proposal; and*
- (b) the objectives of the existing proposal to the extent that those objectives—*
 - (i) are relevant to the objectives of the amending proposal; and*
 - (ii) would remain if the amending proposal were to take effect.*

(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

(4A) If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—

- (a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*
- (b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.*

(10) The benefits and costs are defined in Section 2 of the RMA as including benefits and costs of any kind, whether monetary or non-monetary.

(11) Section 32 applies to the entire policy and plan development and change process from issue identification to decision release. Therefore, Section 32 is applicable:

- When objectives are identified and assessed;
- When examining policies, rules, or other methods;
- After the draft plan or provision is prepared;
- When the decision is made to notify;
- In the officer's report on submissions;
- During deliberations by the council hearings committee; and
- Before the final decision is being released.

(12) A Section 32 evaluation is an iterative process, requiring a regular review of earlier steps and conclusions when necessary

(13) This report has been prepared in accordance with the requirements of Section 32 of the RMA.

2.2 Relevant Case Law

(14) The decision in *Long Bay-Okura Great Parks Society Incorporated v North Shore City Council* (Decision A 078/2008) and amended in *High Country Rosehip Orchards Ltd and Ors v Mackenzie DC* ([2011] NZEnvC 387) to reflect the changes made by the Resource Management Amendment

Act 2005, sets out the mandatory requirements for district plans as follows. These have been updated here to reflect amendments to the RMA.

A. General requirements

1. A district plan should be designed to accord with and assist the territorial authority *to carry out* its functions so as to achieve, the purpose of the Act.
2. When preparing its district plan the territorial authority must *give effect to* any national policy statement or New Zealand Coastal Policy Statement.
3. When preparing its district plan the territorial authority shall:
 - (a) *have regard to* any proposed regional policy statement;
 - (b) *give effect to* any operative regional policy statement;
 - (c) *have regard to* the extent to which the plan needs to be consistent with the plans of adjacent territorial authorities.
4. The Supreme Court (referring to the Environment Court in *Clevedon Cares v Manukau City Council* has stated that ‘give effect to’ simply means ‘implement’. ‘Give effect to’ is a strong directive, creating a firm obligation on those subject to it.

In relation to regional plans:

- (a) the district plan must *not be inconsistent with* an operative regional plan for any matter specified in s30(1) [or a water conservation order]; and
 - (b) *must have regard to* any proposed regional plan on any matter of regional significance etc.;
5. When preparing its district plan the territorial authority must also:
 - have regard to any relevant management plans and strategies under other Acts, and to any relevant entry in the Historic Places Register and to various fisheries regulations; and to consistency with plans and proposed plans of adjacent territorial authorities;
 - take into account any relevant planning document recognised by an iwi authority; and
 - not have regard to trade competition;
6. The district plan must be prepared *in accordance with* any regulation and any direction given by the Minister for the Environment.
7. The requirement that a district plan (change) must also state its objectives, policies and the rules (if any) and may state other matters.

B. Objectives [the s32 test for objectives]

8. Each proposed objective in a district plan is *to be evaluated* by the extent to which it is the most appropriate way to achieve the purpose of the Act.

C. Policies and methods (including rules) [the s32 test for policies and rules]

9. The policies are to *implement* the objectives, and the rules (if any) are to *implement* the policies.
10. Each proposed policy or method (including each rule) is to be examined, as to whether it is the most appropriate method for achieving the objectives of the district plan by:
 - (a) *identifying* other reasonably practicable options for achieving the objectives; and
 - (b) *assessing the efficiency and effectiveness* of the provisions in achieving the objectives, including:
 - (i) identifying, assessing and quantifying (where practicable) the benefits and costs of the environmental, social and cultural effects anticipated from the implementation of the provisions, including opportunities for economic growth and employment; and
 - (ii) assessing the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods; and
 - (iii) if a national environmental standard applies and the proposed rule imposes a greater prohibition or restriction than that, then whether that greater prohibition or restriction is justified in the circumstances.

D. Rules

11. In making a rule the territorial authority must *have regard* to the actual or potential effect of activities on the environment.
12. There are special provisions for rules about contaminated land.
13. There must be no blanket rules about felling of trees in any urban environment.

E. Other statutes

14. Territorial authorities may be required to comply with other statutes.

3. Background

3.1 Purpose and Scope of the Proposed Plan Change

- (15) The purpose of the plan change is to rezone the properties at 190, 236 and 268 Stratton Street in Normandale from their existing zoning as General Rural Activity Area to one that is considered to better meet the purpose of the RMA through the objectives of the District Plan and provide for additional development potential that aligns with the rural character of the surrounding area. As outlined later in this report the Rural Residential Activity Area has been identified as being the most appropriate zoning for the sites.
- (16) The proposed rezoning to Rural Residential Activity Area would allow for the future subdivision and development of the properties at a rural scale. It would thereby assist in providing for the increasing demand for housing. The proposed Rural Residential Activity Area allows for the development of rural residential activities, which is an appropriate activity for the sites given the character of the wider environment. The main differences between the General Rural Activity Area and the Rural Residential Activity Area are the development standards relating to the minimum Net Site Area per Dwelling (15ha in General Rural compared to 2ha in Rural Residential) and the maximum Site Coverage (1000m² in General Rural compared to 450m² in Rural Residential). The range of activities that is provided for in both areas is very similar with a slightly more permissive framework around farming and rural service industries in the General Rural Activity Area. The relevant provisions are compared in more detail in Part 6 of this report.
- (17) The proposed Plan Change does not seek the introduction of any new objectives, policies or rules to the District Plan. Any potential future effects arising from the development of the sites resulting from the proposed Plan Change can be addressed through the existing objective, policies and rules pertaining to the Rural Residential Activity Area.

3.2 Site Description

- (18) The land subject to this proposed Plan Change is located in the Western Hills, in Normandale, Lower Hutt. It comprises an area of approximately 49.8ha, across three separate allotments:
- 190 Stratton Street (SEC 43 Normandale Sett Blk VII D3/922) – 20.28
 - 236 Stratton Street (LOT 1 DP 50184 20B/82) – 12.75
 - 268 Stratton Street (LOT 2 DP 50184 20B/83) – 16.77ha
- (19) All three properties contain an existing dwelling and several detached accessory buildings. The sites are characterised by low density, rural use and development
- (20) All three properties are accessed from Stratton Street and are generally sloping upwards from Stratton Street (west to east), with the high point lying to the east of the properties. Overall the sites are characterised by a mostly rolling modulation with some steeper parts, particularly around gullies and small waterbodies on the sites. Council's Productive Soil Maps do confirm that there is no highly productive Class I or II land in the Western Hills.
- (21) There are no natural hazard risks identified or addressed by the District Plan for this area and there are no known issues around slope stability

- (22) Currently vegetation on the sites has partially been cleared and while other parts of the sites are covered in forest and regenerating vegetation. Based on site visits and analysis of aerials of the sites there appear to be two small streams on the site. Both appear to be intermittent or ephemeral streams. Hutt City Council's earliest aerial photographs of this area are from 2003 so there is limited information on earlier uses or clearances.
- (23) The recent Ecology and Landscape project undertaken by Council did identify two potential areas of significance on the sites subject to this proposed Plan Change. However, Council decided not to introduce any mandatory restrictions on private land.
- (24) Chapter 14E of the District Plan identifies areas that contain Significant Natural Resources (SNRs). Two of the three properties subject to this proposed Plan Change are partly affected by an identified SNR (SNR38 – Normandale Road Bush). Chapter 14E includes objectives, policies and rules to protect identified SNRs from inappropriate subdivision, use and development. However, as a result of two Environment Court decisions from 2004 the rules do not apply to identified SNRs on private land.
- (25) It should be noted that the recently identified potential areas of significance do not match the location of SNR 38 as identified in the District Plan.
- (26) There are no significant cultural or archaeological sites or heritage buildings and structures identified on the sites.
- (27) The adjoining properties to the west and north form part of the Belmont Regional Park and are zoned General Recreation Activity Area. Belmont Regional Park is located between Porirua and Lower Hutt and is the largest park in the Wellington region. The park has numerous access points, one of them being located at the end of Stratton Street.
- (28) The property to the south of the proposed Plan Change is known as 'Cottle Park' and also zoned General Recreation Activity Area. Two privately owned properties located to the west of Stratton Street as well as the land adjoining the proposed Plan Change on the eastern side are zoned Rural Residential Activity Area, which is in line with the zoning of the majority of private properties in this part of Normandale.
- (29) A review of the zoning history of the sites under previous District Schemes up to the proposed District Plan did not provide any conclusive reasons for the zoning of this pocket of land as General Rural Activity Area. Under the *City of Lower Hutt Western Hills Area District Scheme* and the *Transitional District Plan* the properties were part of a Belmont Regional Park zone.
- (30) Being located in a rural environment the properties subject to this plan change as well as any other properties in the area are not connected to Council's water infrastructure. Wellington Electricity confirmed that while the infrastructure in this area has limited capacity, the power requirement for this development can be supplied.
- (31) As a result of this proposed Plan Change only the property at 301 Normandale Road would remain zoned as General Rural Activity Area.

3.3 Scale and Significance Assessment

3.3.1 Introduction

- (32) Under Section 32(1)(c) of the RMA, this evaluation report needs to:

*contain a level of detail that corresponds to the **scale and significance** of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal. (emphasis added)*

- (33) The following Scale and Significance Assessment discusses the Proposed Plan Change in terms of 8 factors and scores each factor out of 5 (where 1 is low and 5 is high).
- (34) The assessment concludes with a table summarising the factors and scores and gives a final overall score for the scale and significance of the proposed Plan Change.

3.3.2 Factor 1 Reason for the Change

- (35) The proposed Plan Change seeks to rezone three properties from General Rural to Rural Residential Activity Area. The zoning as Rural Residential Activity Area would be consistent with the zoning of surrounding private properties and, as outlined later in this report, is the most appropriate zoning for the sites. Given the sloping topography and limited size of the sites there is only limited opportunity for classic rural activities as anticipated by the General Rural zoning. The plan change would result in a zoning that is more consistent to the character and use of the sites and the surrounding area. The proposed zoning would enable further subdivision of the sites to a minimum lot size of 2ha (compared to 15ha in the General Rural Activity Area).
- (36) For the reasons identified above *Factor 1 Reason for the Change* scores 2.

3.3.3 Factor 2 Resource Management Issues / Problem Definition

- (37) The main issue identified and addressed by this proposed Plan Change is the current zoning of the sites as General Rural Activity Area which is not considered to be the most appropriate zoning.
- (38) The resource management issues identified by the District Plan that would be addressed through this plan change are as follows:
 - *Issue 1.10.2 – The different character and amenity values of areas contribute significantly to the environment of the City. The Act recognises the importance of people’s environment (which is defined to include amenity values) and it is necessary to recognise as essential elements in the Plan.*
 - *Issue 8A 1.1.1 – The mix of residential and small scale rural activities, the subdivision pattern and the sense of open space contribute to the character and amenity values of the various rural residential areas. Inappropriate activities, and development and performance standards will adversely affect the existing character and amenity values of these areas.*
 - *Issue 8A 1.1.4 – It is appropriate to allow a range of recreation and leisure activities in rural residential areas, where amenity values and character can be maintained.*
 - *Issue 8A 1.2.1 - The size and shape of sites, the number and size of buildings and the location of buildings on the sites are important elements in determining the character and amenity values of rural residential areas. It is necessary to have conditions relating to these elements to ensure the character and amenity values of rural residential areas are maintained, and that buildings and structures are sited to avoid or mitigate the adverse effects of flood hazards.*

- (39) These resource management issues have been identified in the District Plan and are addressed through the existing objective, policy and rule frameworks of the District Plan pertaining to the Rural Residential Activity Area. The current objectives, policies and rules are considered suitable to be applied to the sites subject to this plan change without requiring any site specific amendments or provisions. No new issues have been identified that would require site specific provisions.
- (40) Factor 2 Resource Management Issues / Problem Definition scores 1 for the above reasons.

3.3.4 Factor 3 Degree of Shift from the Status Quo

- (41) The sites subject to this plan change are currently zoned General Rural Activity Area which is an established zone in the District Plan. The proposal would rezone the sites to the Rural Residential Activity Area, which is also an established zone. The existing General Rural Activity Area zoning is not considered to be the most appropriate zoning for the plan change sites, due to limited opportunities for rural activities caused by the topography, size and soil condition of the sites. It is considered that the Rural Residential Activity Area is the more appropriate zoning for the sites. This zoning would be consistent with the zoning of properties in the immediate environment, which have a similar development form and topography as the plan change sites.
- (42) No new objectives, policies or rules are proposed as part of this plan change. In this regard, the proposal does not represent a shift in how the District Plan operates, with the main change in the local area being the potential increase in development resulting from the Rural Residential Activity Area zoning.
- (43) Factor 3 Degree of Shift from the Status Quo scores 1.

3.3.5 Factor 4 Who and How Many Will be Affected/Geographical Scale of Effects

- (44) The three properties proposed to be rezoned are not visually prominent when viewed from the wider environment. The proposal would allow for a more intense development, when compared to the existing situation. However, any effects from future development of the sites would be limited to those properties in the immediate environment, who would be the only parties to discern any change from this rezoning. Therefore, the effects associated with this plan change would not be significant and localised.
- (45) Factor 4 Who and How Many Will be Affected/Geographical Scale of Effects scores 1.

3.3.6 Factor 5 Degree of Impact on or Interest from Iwi/Maori

- (46) The plan change sites are not identified as having cultural values, nor is it located on the boundary of any sites of identified cultural value. Furthermore, Port Nicholson Block Settlement Trust, Ngati Toa and other iwi organisations have been contacted and consulted regarding this plan change but have not yet provided any comments.
- (47) Factor 5 Degree of Impact on or Interest from Iwi/Maori scores 1.

3.3.7 Factor 6 Timing and Duration of Effects

- (48) The effects from the proposed Plan Change will be ongoing from the time the rezoning becomes operative. While any construction effects associated with the development of the sites would be

temporary, the subdivision and development facilitated by the plan change and any resulting effects would be ongoing.

- (49) For the above reasons Factor 6 Timing and Duration of Effects scores 2.

3.3.8 Factor 7 Type of Effects

- (50) The proposed Plan Change does not propose any changes to the existing District Plan objectives, policies and rules. The effects generated by development enabled by these provisions are well understood and are similar to the effects generated by existing development on surrounding sites that are also zoned Rural Residential Activity Area.
- (51) *Factor 7 Type of Effects* scores 1 due to the low significance of the effects.

3.3.9 Factor 8 Degree of Risk and Uncertainty

- (52) The degree of risk and uncertainty is low. The Rural Residential Activity Area provisions proposed for the plan change sites are well established in the District Plan and the resulting development forms are well understood.
- (53) *Factor 8 Degree of Risk and Uncertainty* scores 1 due to the certainty provided by the existing proposed zone provisions.

3.3.10 Overall Scale and Significance

- (54) Table 1 Summary of Scale and Significance below lists the factors discussed above and the scores for each factor. The scores are then combined to give a total scale and significance score for the proposed Plan Change.

Table 1: Summary of Scale and Significance

Factor	Score
1. Reason for Change	2
2. Resource Management Issues / Problem Definition	1
3. Degree of Shift from Status Quo	1
4. Who and How Many Affected, Geographic Scale of Effects	1
5. Degree of Impact on or Interest from Maori	1
6. Timing and Duration of Effects	2
7. Type of Effect	1
8. Degree of Risk or Uncertainty	1
Total (out of 40)	10

- (55) Total Score Interpretation
- 0-10 Scale and Significance = Low

11-20 Scale and Significance = Moderate

21-30 Scale and Significance = High

31-40 Scale and Significance = Very High

- (56) The low total score of 10 reflects the overall low scale and significance of the proposed plan change.

3.4 Evidence Base - Research, Information and Analysis undertaken

- (57) The following technical advice has been commissioned to inform the proposed Plan Change:
- An indicative concept plans showing a complying subdivision under the proposed zone (Appendix 1); and
 - Traffic engineering advice in respect of access and potential increase in vehicle numbers in the area from additional residential properties (Appendix 2).
- (58) The indicative concept plan has been prepared to show the maximum number of lots that can be achieved based on the subdivision and development standards applying to the Rural Residential Activity Area. It does not consider the topography of the sites or other potential restraints on development. The actual number of lots that can be realised on the sites is therefore expected to be lower than shown in the indicative concept plan. It should further be noted that the indicative concept plan includes the site at 301 Normandale Road, however the owner of this property no longer wishes to be part of this process and therefore 301 Normandale Road does not form part of this private plan change request.
- (59) The findings of the above mentioned Transportation Impact Assessment are discussed in more detail in Part 7.2 of this report.
- (60) Hutt City Council policies and strategies have been analysed and considered and the outcomes of earlier investigation by Hutt City Council relating to Significant Natural Areas and Outstanding Natural Features and Landscapes have been taken into account.

3.5 Quantification

- (61) Section 32(2)(b) requires that, if practicable, the benefits and costs of a proposal are quantified. Given the assessment of the scale and significance of the proposal above it is considered that quantifying costs and benefits would add significant time and cost to the Section 32 evaluation processes, relative to the scale and significance of the plan change. Therefore, while costs and benefits have been considered in evaluating different options below, an exact quantification of benefits and costs was not considered necessary, beneficial or practicable. Rather, this report identifies where there may be additional costs or cost savings.

4. Consultation

(62) In fulfilment of the requirements of Schedule 1, Clause 3 of the RMA - Plan Change process, the following parties were informed by email/letter about the intention to request a private plan change to rezone the properties from General Rural to Rural Residential Activity Area and invited to provide comments and feedback:

- Ministry for the Environment;
- Greater Wellington Regional Council;
- Upper Hutt City Council;
- Wellington City Council
- Porirua City Council;
- Port Nicholson Block Settlement Trust;
- Ngati Toa
- Te Atiawa
- New Zealand Transport Agency (NZTA)
- Transpower
- Wellington Electricity

(63) To date the following feedback has been received:

4.1 Greater Wellington Regional Council

(64) Greater Wellington Regional Council responded to the consultation and a meeting was held on 5 June 2019. The main concerns raised at the meeting and the responses are outlined below:

Issue

Greater Wellington Regional Council would prefer a structure plan for the sites.

Response

The plan change sites are in separate ownership and there is no plan to develop the sites collectively. The costs and complexity of a structure plan are disproportionate relative to the scale of the proposal. Furthermore, there are no plans to develop the sites to a scale that is greater than what the Rural Residential Activity Area allows for. In this regard, rezoning the sites to Rural Residential Activity Area is the most proportionate and appropriate for the sites.

Issue

The plan change could result in a loss of watercourses.

Response

The plan change is not seeking approval to pipe or infill any watercourses. If this arises as a result of any of the sites being subdivided and developed, then resource consent from Greater Wellington will be required and the effects would be assessed.

Issue

The plan change would not protect the native vegetation on the sites.

Response

The District Plan identifies a Significant Natural Resource on the sites. While the Significant Natural Resources rules do not apply to private property, one of the assessment matters of any subdivision is how the proposal protects Significant Natural, Cultural or Archaeological Resources. In this regard, there is opportunity to protect area of significant ecological values through the existing rule framework in the District Plan.

- (65) It was agreed to document these matters within the Section 32 report.

4.2 Wellington Electricity

- (66) Wellington Electricity advised that the lines that service the sites would need upgrading at a cost of approximately \$300,000 (HV reinforcement only) to \$400,000 (LV and HV reinforcement) if the sites were subdivided. This information was passed on to the private plan change applicants who consider these costs to be acceptable.

4.3 Transpower

- (67) Transpower advised that the private plan change would not have an impact on Transpower's assets.

4.4 Wellington City Council

- (68) Wellington City Council advised that the proposed plan change raised no issues for the Council and that there is no need include Wellington City Council in any further consultation on this plan change.

4.5 New Zealand Transport Agency

- (69) NZTA acknowledged the receipt but did not provide any further comment or feedback.

5. National, Regional and Local Policy Framework

- (70) The following section of this report considers the proposed plan change against the national, regional and local policy framework.

5.1 Part 2 of the RMA

- (71) Part 2 of the RMA outlines the purposes and principles.

5.1.1 Section 5

- (72) Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.
- (73) The purpose of the rezoning of the plan change sites is to ensure that the sites are most appropriately zoned to meet the purpose of the RMA. The plan change sites do not lend themselves to rural activities due to their topography, size and soil condition. As such, the current zoning as General Rural Activity Area is not considered to be the most appropriate zone as the land does not support the activities encouraged by the General Rural Activity Area.
- (74) Properties located to the east of the proposed plan change sites are currently zoned Rural Residential. Therefore, once rezoned, the sites will fit in better with the surrounding zoning and anticipated land use and activities.
- (75) Given the context of the plan change sites, it is considered that the proposed zoning as Rural Residential Activity Area represents the best zone to achieve the sustainable management of the sites. This zone would support rural residential activities being established on the sites, which would allow for future development of the area in accordance with the character of the zone. It is considered that any potential effects associated with the sites being developed in accordance with the Rural Residential provisions can be addressed through the existing rules of the District Plan. These rules already contain provisions to manage the bulk and height of buildings relative to activities other residentially zoned properties.
- (76) If these activities were to be established on the sites, then they would be required to comply with the rules of Chapter 8A. The activities provided for by the zone are considered to represent a sustainable use of the sites, given the presence of residential development in the immediate area, and that any resulting effects from these activities would be appropriately mitigated through the existing provisions in Chapter 8A of the District Plan.
- (77) Given the above factors, the proposed Rural Residential Activity Area is considered to be consistent with Section 5 of the RMA.

5.1.2 Section 6

- (78) Section 6 of the RMA identifies matters of National Importance. It states:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) *the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;*
- (b) *the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development;*
- (c) *the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;*
- (d) *the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers;*
- (e) *the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga;*
- (f) *the protection of historic heritage from inappropriate subdivision, use, and development;*
- (g) *the protection of protected customary rights.*
- (h) *management of significant natural hazard risk.*

The only matter of relevance to this plan change is Section 6(c). SNR 38 is partially located on two of the three sites subject to this plan change. While the rules relating to Significant Natural Areas do not apply to private properties, the existing provisions within the Subdivision Chapter (Chapter 11) will ensure that the integrity of the SNR can be considered. As part of Council's recent project on Ecology and Landscapes two potential areas of significance were identified – one on the 190 Stratton Street and one on 268 Stratton Street. However, Council decided not to proceed with the project to avoid mandatory restrictions on private landowners. As such the proposal is consistent with Section 6(c) of the RMA. It is considered that there are no other relevant Section 6 Matters that require consideration as part of this proposal.

5.1.3 Section 7

- (79) Section 7 of the RMA identifies the other matters that are required to be taken into account when assessing this plan change. Section 7 states:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

- (a) *kaitiakitanga:*
 - (aa) *the ethic of stewardship:*
- (b) *the efficient use and development of natural and physical resources:*
 - (ba) *the efficiency of the end use of energy:*
- (c) *the maintenance and enhancement of amenity values:*
- (d) *intrinsic values of ecosystems:*
- (e) *[Repealed]*
- (f) *maintenance and enhancement of the quality of the environment:*
- (g) *any finite characteristics of natural and physical resources:*

- (h) *the protection of the habitat of trout and salmon:*
- (i) *the effects of climate change:*
- (j) *the benefits to be derived from the use and development of renewable energy.*

(80) The Section 7 matters that are relevant to this proposal are 7(b), 7(c), 7(d) and 7(f). The proposed plan change is consistent with these subsections. The proposed rezoning and the existing objectives, policies and rules will ensure that future development will be undertaken in a manner that is consistent with the established amenity and character of the local environment.

5.1.4 Section 8

(81) Section 8 states:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi.

(82) Section 8 of the RMA requires that the principles of the Treaty of Waitangi are taken into account when preparing this plan change. As part of the consultation process, local iwi were invited to provide feedback on the plan change. No comments or feedback have been received at this stage. It is considered that the proposal is consistent with Section 8 of the RMA.

(83) Further consultation with iwi will be undertaken as required by the RMA.

5.2 Part 5 of the RMA

(84) Part 5 sets out the responsibilities and requirements for territorial authorities including the requirements in regard to formulating plans and ensuring they are consistent with higher order planning documents.

(85) Section 73(4) requires District Plans to give effect to Regional Policy Statements.

(86) Under Section 74(1)(ea) District Plans must be prepared and changed in accordance with National Policy Statements, the New Zealand Coastal Policy Statement and the National Planning Standards. Under Section 74(2) a territorial authority, when preparing or changing a plan, shall have regard to any proposed regional plan, any management plans and strategies prepared under other Acts, the New Zealand Heritage List/Rārangī Kōrero and consistency with the District Plans of adjacent territorial authorities. Section 74(2A) requires territorial authorities to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority when preparing or changing a district plan. The proposed Plan Change does not seek any changes to the operative provisions of the District Plan, except for the rezoning of the plan change sites. In preparing the proposed Plan Change any relevant legislation and strategies have been considered. There are no iwi management plans or other planning documents recognised by iwi in place.

(87) Section 75(3) requires District Plans to give effect to any national policy statement, the New Zealand Coastal Policy Statement, a National Planning Standard and any regional policy statement. It must not be inconsistent with a regional plan.

5.3 National Policy Statements

- (88) As mentioned above Section 75(3)(a) of the RMA states that a District Plan change must give effect to any National Policy Statement.
- (89) The following National Policy Statements are currently in force:
- National Policy Statement on Urban Development Capacity;
 - National Policy Statement for Freshwater Management;
 - National Policy Statement for Renewable Electricity Generation; and
 - National Policy Statement on Electricity Transmission.
- (90) The National Policy Statement on Urban Development Capacity applies to urban development. The proposed Plan Change seeks to change the zoning of the affected sites from General Rural Activity Area to Rural Residential Activity Area. It does not propose the rezoning of the sites to an existing urban zone or the creation of a new urban zone. While the rezoning would provide for some additional residential development potential, this additional development would be located in a rural environment and expected to be of a scale that is guided by more restrictive rural activity area provisions. As such, the proposed Plan Change is consistent with and give effect to the National Policy Statement on Urban Development.
- (91) It is considered there are no other National Policy Statements relevant to this proposed plan change.

5.4 New Zealand Coastal Policy Statement

- (92) Section 75(3)(b) of the RMA states that a district plan change must give effect to the New Zealand Coastal Policy Statement.
- (93) The sites subject to this plan change are located in the Western Hills of Lower Hutt and thereby well outside the coastal marine area. Therefore, the New Zealand Coastal Policy Statement is not considered to be relevant in the consideration of the proposed plan change.

5.5 National Planning Standards

- (94) Section 75(3)(ba) of the RMA also states that a district plan change must give effect to any national planning standard.
- (95) The first set of National Planning Standards became operative on 5 April 2019. The National Planning Standards seek to standardise a wide range of metrics within Regional and District Plans nationwide, to improve the efficiency and effectiveness of the planning system by providing for national consistency. The National Planning Standards contain varying timescales for territorial authorities to incorporate and adopt the standardised frameworks into their plans.
- (96) This site-specific plan change does not propose any changes to the provisions of the District Plan and therefore it is not the appropriate tool to begin a restructure of the District Plan in accordance with the National Planning Standards.

5.6 National Environmental Standards (NES)

- (97) Under Section 44A of the RMA a district plan must avoid conflict with and duplication of National Environmental Standards. The following National Environmental Standards are currently in force:
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health;
 - National Environmental Standards for Electricity Transmission Activities;
 - National Environmental Standard for Sources of Drinking Water;
 - National Environmental Standards for Air Quality;
 - National Environmental Standards for Telecommunication Facilities; and
 - National Environmental Standards for Plantation Forestry.
- (98) Under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, if a site has been the subject of an activity or industry described in the Ministry for the Environment's Hazardous Activities and Industries List ('HAIL') then the NESCS warrants further consideration. It is our understanding that no previous activities have occurred on the sites which are identified on the HAIL list. As such, no further assessment against this National Environmental Standard is required for the proposal.
- (99) It is considered that the National Environmental Standards pertaining to air quality, electricity transmission activities, telecommunication facilities, plantation forestry and water quality for human consumption are not applicable to this proposal.

5.7 Regional Policy Statement for the Wellington Region

- (100) Section 75(3)(c) of the RMA states that a district plan change must give effect to any regional policy statement.
- (101) The Regional Policy Statement for the Wellington Region (RPS) sets out the regional approach for managing the environment and providing for growth and associated effects. The RPS identifies the significant resource management issues for the region and outlines the policies and methods required to achieve the integrated sustainable management of the region's natural and physical resources.
- (102) The objective and policy of the RPS most relevant to the plan change are as follows:

Regional Form, Design and Function

Objective 22

A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:

- (e) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;*
- (g) a range of housing (including affordable housing)*
- (h) integrated public open spaces;*

(k) *efficiently use existing infrastructure (including transport network infrastructure);*

(l) *essential social services to meet the region's needs.*

Policy 33

Supporting a compact, well designed and sustainable regional form.

Policy 55

Maintaining a compact, well designed and sustainable regional form.

Policy 56

Managing development in rural areas – consideration

Policy 57

Integrating land use and transportation – consideration

Policy 58

Co-ordinating land use with development and operation of infrastructure.

Policy 67

Maintaining and enhancing a compact, well designed and sustainable regional form.

- (103) The proposal is consistent with the above objective and policies. While the plan change would enable a higher degree of development on the plan change sites, the development is still low density and reflective of the sites position on the edge of the urban area and the infrastructure limitations that exist in the area. The proposal does not promote or represent urban sprawl and therefore assists with the Hutt Valley maintaining a compact urban form. The plan changes would not result in an inappropriate development occurring on former rural land. This is due to the low quality of the soils on the sites and the topography of the properties.

Soils

Objective 30

Soils maintain those desirable physical, chemical and biological characteristics that enable them to retain their ecosystem function and range of uses

Policy 59

Retaining highly productive agricultural land (Class I and II land) – consideration

- (104) The proposed Plan Change is consistent with the above objective and policy. While the sites are in the General Rural Activity Area, the soils are not highly productive and therefore do not need to be retained for rural activities.

- (105) The following policies have been reviewed and are considered to be of limited relevance:

Earthworks

Policies 15 and 41

Minimising the effects of earthworks and vegetation disturbance.

- (106) The proposed Plan Change does not propose any changes to the current earthworks provisions. Furthermore, the thresholds for earthworks are the same for the Rural Residential Activity Area and the General Rural Activity Area.

Biodiversity

Policy 23

Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values.

Policy 24

Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values.

Policy 47

Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values.

- (107) As mentioned above Hutt City Council has recently undertaken the Ecology and Landscapes project which identified Significant Natural Areas but decided not to proceed with a plan change that would have provided protection for those SNAs.

Natural Hazards

Policy 29

Avoiding inappropriate subdivision and development in areas at high risk from natural hazards.

Policy 51

Minimising the risks and consequences of natural hazards.

- (108) The sites subject to the proposed Plan Change have not been identified as areas at risk from natural hazards. The only potential risk may be slope stability. However, the sites are not overly steep and the potential risk can be appropriately addressed at time of subdivision consent.

Water Quality

Policy 40

Maintaining and enhancing aquatic ecosystem health in water bodies.

Policy 42

Minimising contamination in stormwater from development.

Policy 43

Protecting aquatic ecological function of water bodies

- (109) Any potential effects on streams on the site will be addressed at the time of subdivision consent. As discussed earlier any proposal to pipe or infill any watercourses on the sites to provide for subdivision or development would require resource consent from Greater Wellington and the effects would be assessed at that stage.

Tangata Whenua

Policy 48

Principles of the Treaty of Waitangi

Policy 49

Recognising and providing for matters of significance to tangata whenua

- (110) The District Plan does not identify any sites of cultural significance in the area subject to this plan change. Local iwi have been asked for feedback on the proposal but not response has been received.

Public Access

Policy 53

Public access to and along the coastal marine area, lakes and rivers

- (111) There are no rivers or lakes located on the sites subject to this plan change.

5.8 Wellington Regional Plans

- (112) Section 75(4)(b) of the RMA requires the proposed changes to not be inconsistent with any regional plan for any matter specified in Section 30(1) of the RMA (regarding functions of regional councils).
- (113) The Wellington Region has the following regional plans:
- Regional Coastal Plan;
 - Regional Air Quality Management Plan;
 - Regional Freshwater Plan;
 - Regional Plan for Discharges to Land; and
 - Regional Soil Plan.
- (114) There are no specific objectives and policies in these regional plans that would affect the proposed plan change. As such, the proposed plan change is considered to not be inconsistent with any of the regional plans and therefore meets the tests under Section 75 (4)(b).

5.9 Proposed Natural Resources Plan for the Wellington Region

- (115) Section 74(2)(a)(ii) of the RMA requires Council to have regard to any proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4.
- (116) The proposed Natural Resources Plan for the Wellington Region is a combined air, land, water and coastal plan. It will replace the existing Regional Coastal Plan and the four regional plans (Regional Air Quality Management Plan, Regional Freshwater Plan, Regional Plan for Discharges to Land and, Regional Soil Plan) once it is made operative. However, all rules within the proposed Plan have immediate legal effect.
- (117) There are no specific objectives and policies in the proposed Natural Resources Plan for the Wellington Region that are directly applicable to this proposed plan change. However, it is noted

that the proposed plan change will not be contrary, inconsistent or undermine any of the objectives or policies as they are currently proposed.

5.10 District Plans in the Wellington Region

- (118) Section 74(2)(c) of the RMA requires Council to consider the extent to which this Plan Change needs to be consistent with the plans or proposed plans of adjacent territorial authorities.
- (119) The Proposed Plan Change involves a small area of land that is located well within the boundaries of the City of Lower Hutt. It will have no effect on the operative plans or proposed plans of any adjacent territorial authorities and as such, will not be inconsistent with them.

5.11 Hutt City Council Strategies and Policies

- (120) Section 74(2)(b)(i) of the RMA requires Council to have regard to management plans and strategies prepared under other Acts. For the purposes of this plan change, the relevant strategies and policies are as follows:
- Urban Growth Strategy 2013 – 2032; and
 - Environment Sustainability Strategy 2015 – 2045.
- (121) The Long Term Plan 2018-2028 and the Infrastructure Strategy 2018-2048 have been reviewed but do not contain any relevant references to the Western Hills in general or the plan change sites in particular.

5.11.1 Urban Growth Strategy 2012 - 2032

- (122) In 2013, Hutt City Council approved its Urban Growth Strategy that encourages 6,000 houses to be constructed in the District over the next 20 years. While the sites are not specifically identified within this Strategy, the proposed plan change would allow for further dwellings to be established on the plan change sites and is consistent with a review of rural land in the Normandale area as envisaged by the Urban Growth Strategy. As such, the proposed plan change would directly assist with meeting the number of dwellings that the Hutt Valley is intending to achieve.

5.11.2 Environmental Sustainability Strategy 2015 – 2045

- (123) The Environmental Sustainability Strategy sets out Council's ambitions to protect, enhance or repair the environment. The Strategy identifies seven key focus areas: water, waste, transport, land use, biodiversity, energy and risk and resilience. Each focus area is led by three overarching strategic goals – lead, protect and enhance.
- (124) The Plan Change does not conflict with the Environmental Sustainability Strategy.

5.12 City of Lower Hutt District Plan

5.12.1 City Wide Objectives and Policies

- (125) This section reviews the existing city wide objectives and policies of the District Plan to assess whether they are sufficient to provide the required level of policy support to the proposed Plan Change.

- (126) The following objectives and policies of the operative District Plan are relevant to the Plan Change.

1.10.1 Resource Management and the Tangata Whenua of Lower Hutt

Objective

To respond to the principles of the Treaty of Waitangi and other matters of significance to the tangata whenua as specified in the Act.

Policies

- (a) To have particular regard to tangata whenua's desire to carry out kaitiakitanga.*
- (d) To consult with the tangata whenua when discharging functions and duties under the Act.*

- (127) The Proposed Plan Change is consistent with the above Area Wide Objectives and Policies of the District Plan. Tangata whenua have been consulted with as part of the plan change process. At the time of lodgement of this plan change no feedback has been received from iwi.

1.10.2 Amenity Value

Objective

To identify, maintain and enhance the character and amenity values of the different activity areas.

Policy

To identify within all activity areas the general character and amenity values of that activity areas.

Explanation and Reasons

Rural Activity Areas

Many elements contribute to rural amenity values including topography; the coast; significant natural, cultural and archaeological resources; land uses including farming and forestry, rural lifestyle development; recreation uses and opportunities; water catchment and treatment facilities; existing subdivision patterns; and built structures. In the rural areas the amenity values are made up of components that include physical features, land use patterns, planting patterns, built features (including roading formations), views and vistas, subdivisional patterns, colours, and accessibility.

Rural Residential Activity Area:

There are a number of relatively small areas falling into the Rural Residential Activity Areas. These include locations on the western hills of the Hutt Valley; Upper Fitzherbert Road, Wainuiomata; Moores Valley; and Coast Road just beyond the urban area of Wainuiomata. Generally these rural residential areas derive their amenity values from factors which include property size and subdivisional pattern, the physical environment, and their accessibility to urban areas. Rural based industries including boarding facilities for domestic pets and plant nurseries are located in rural residential areas. The various locations do have different amenity values which contribute to their uniqueness. Rural residential areas on the western hills are located

between Normandale and Belmont, and fronting Liverton Road. These areas are easily accessible from the urban areas of the Hutt Valley and from the State Highway. Generally the properties are small in size, the majority having land areas between 2ha and 10ha. The eastern side of Moores Valley Road is characterised by steeper land, many existing dwellings being sited above the road level. Properties on the western side of the road are generally flat for approximately half their depth. This area is also characterised by its valley nature. In Upper Fitzherbert Road lot sizes vary from 4ha up to 38ha, many with large frontages. Much of the land is flat, with land rising towards the back of several properties.

General Rural Activity Area:

This activity area contains a vast land area with a relatively small amount of it located on the western hills of the Hutt Valley, but the vast majority is beyond the urban area of Wainuiomata. The activity area is dominated by diverse topography. From Eastbourne around to the City's boundary with the South Wairarapa District an extensive area is influenced by the coast. Two major river valley's, the Wainuiomata and Orongorongo, dominate the physical environment together with many other river and stream networks. From flat river terraces land rises to dominant and often steep hill areas. Within the hilly areas are isolated locations of more gentle topography. On the western hills of the Hutt Valley, the topography is characterised by the steep escarpment bordering the Hutt River and more gentle hill country leading back into the Belmont Regional Park. The influence of the coast on the character and amenity values of some parts of the rural environment is very significant. The original character of the coastal environment has been modified over time but retains a natural character. Throughout the coastal environment topographical features such as the beaches, the sea cliffs, the sloping marine terraces, the higher eroded terraces and the hills retain their natural character.

...

The presence of a number of strong land uses influences the character and amenity values of the activity area. These include pastoral farming, forestry, recreation, water catchment and lifestyle farming.

- (128) The development density anticipated under the proposed Rural Residential Activity Area would be consistent with the established character of the local environment, given the presence of rural residential land to the south and east of the plan change site. Given these factors, it is considered that the proposed Rural Residential zoning is appropriate for the site and will maintain the amenity value of the surrounding environment.

1.10.7 Rural Activities

Objective

To protect and enhance the rural character, landscape and amenity values of the rural activity area.

Policies

- (a) *To manage the minimum size of allotments and the minimum net site area for dwellings to ensure that the adverse effects are no more than minor.*

- (b) *To manage activities to ensure that the adverse effects are no more than minor on open space character, landscape and amenity values.*
- (c) *To ensure that rural character and amenity values are not compromised through intensive development or fragmentation.*

- (129) The proposal is consistent with the objective and policies under 1.10.7 as the sites would retain a rural zoning following the plan change. The proposed Rural Residential Activity Area zoning would be more consistent with the character and established activities in the immediate area as well as the wider Hutt Valley context when considering the landform and topography normally associated with the Rural Residential Activity Area zoning.
- (130) In the Hutt Valley private properties in the General Rural Activity Area are generally comprised of sites that contain large pastoral paddocks with vegetated hillsides. The plan change sites do not meet this land development pattern as they are largely sloping topography with little or no pastoral land. This contrasts with the Rural Residential Activity Area where properties may have small areas of pastoral land or may have none at all. The topography of Rural Residential Activity Area properties varies greater from sites with flat areas, bounded by sloping land, through to largely sloping properties. Given this topographic variety, the plan change sites more closely align with the physical characteristic of the Rural Residential Activity Area as opposed to the General Rural Activity Area. Therefore, the proposal is considered to better align with the policy outcomes of 1.10.2.
- (131) The proposed plan change does not seek any changes to the minimum lot size of the Rural Residential Activity Area or to any of the bulk and location provisions. In this regard, the proposed plan change is considered to maintain the rural character of the local area.
- (132) It is considered that the proposed rezoning to Rural Residential Activity Area is consistent with the relevant City Wide objectives and policies.

5.12.2 Zone Specific Objectives and Policies

- (133) This section assesses the proposed plan change against the following zone specific objectives and policies of the Rural Residential Activity Area (Chapter 8A):

8A 1.1.1 Rural Residential Character and Amenity Values

Objective

To ensure that the character and amenity values of rural residential areas are maintained and enhanced.

Policy

- (a) *To provide for rural residential development where the existing activities and subdivision pattern have established areas with rural residential characteristics and amenity values.*
- (b) *To ensure that the adverse effects of activities do not detrimentally affect rural residential character and amenity values or the intrinsic values of ecosystems.*
- (c) *To allow for small businesses providing products and services to the entire City and where a rural environment is more appropriate because of the scale and effects generated by the activities.*

- (d) *To ensure that rural residential character and amenity values are not compromised by inappropriate subdivision standards.*

8A 1.1.2 Opportunity for Future Urban Growth

Objective

To retain land as rural residential, recognising that it may be appropriate to utilise the land for urban expansion in the future if demand justifies this.

Policy

- (a) *To allow for rural residential development adjacent to urban environments where it may be appropriate for there to be expansion of the urban environment in the long term future.*

8A 1.2.1 Minimum Requirements for Sites and Buildings

Objective

To recognise those elements within a site that determine the character and amenity of rural residential areas and manage them effectively.

Policy

- (a) *To ensure the character and amenity values of rural residential areas are maintained and enhanced through specific minimum site area conditions for dwellings.*
- (b) *To require minimum setback requirements and maximum site coverage for all buildings.*
- (c) *To establish appropriate minimum conditions for the size and shape of sites.*
- (d) *To manage the siting of all buildings and structures to mitigate the effects of a flood hazard on development.*

- (134) In summary Objectives 8A 1.1.1, 8A 1.1.2 and 8A 1.2.1 seek to encourage a variety of activities within the Rural Residential Activity Area and to ensure that any resulting development maintains the amenity values of the local environment. The proposed rezoning to Rural Residential Activity Area would result in a zoning that is consistent with the neighbouring properties to the east. The Rural Residential zone contains rules that seek to ensure that development maintains the amenity values and character of the local environment. It is considered that these rules are sufficient to ensure that any future development undertaken as a result of this plan change is consistent with the established character and amenity values of the local environment. It is considered that no site specific rules are required to ensure that the outcomes sought under the existing objectives are achieved.
- (135) Policy 8A 1.1.1 seeks to encourage a range of activities, while ensuring that the resulting effects on the amenity values of the surrounding environment are maintained. The existing rules of the Rural Residential Activity Area are considered to be sufficient to ensure that any future use of the sites is compatible with the amenity values and character of the local environment.
- (136) Policy 8A 1.1.2 provides for future development of rural land should demand justify this. The rezoning would provide additional development potential for rural land in this area.

- (137) Policy 8A 1.2.1 seeks to manage the bulk of buildings. It is considered that the existing bulk and location rules for the Rural Residential Activity Area relating to minimum net site areas, height, yards, recession planes and site coverage are suitable to achieve the outcomes envisaged by the policies.

6. Evaluation of Options

(138) During the preparation of this plan change the following three options were considered:

- **Option A:** Do Nothing (i.e. retain the existing zoning as General Rural Activity Area).
- **Option B:** Rezone the sites to Rural Residential Activity Area.
- **Option C:** Rezone the sites to Hill Residential Activity Area.

(139) The main bulk and location provisions for permitted activities in the three activity areas are summarised below:

Table 2: Comparison of relevant Bulk and Location Provisions

	General Rural Activity Area	Rural Residential Activity Area	Hill Residential Activity Area
Max. Number of Dwellings per Site	2	n/a	n/a
Min. Net Site Area per Dwelling	15ha	2ha	1000m ²
Min. Yards	10m for principle buildings 5m for accessory buildings	10m for principle buildings 5m for accessory buildings	4.5m front yards 3m side yards 7.5m rear yards
Max. Height	8m	8m	8m
Recession Planes	2.5+45° from north facing boundaries 2.5+41° from north-east and north-west boundaries 2.5+37.5° from all other boundaries	2.5+45° from north facing boundaries 2.5+41° from north-east and north-west boundaries 2.5+37.5° from all other boundaries	2.5+45° from all boundaries
Max. Site Coverage	1000m ²	450m ²	35%
Max. Building Length	n/a	n/a	20m
Min. Permeable Surface	n/a	n/a	30%
Max. Earthworks	Volume: 50m ³ Ground level alteration: 1.2m	Volume: 50m ³ Ground level alteration: 1.2m	none

- (140) The activities provided for in the General Rural and Rural Residential Activity Areas are quite similar with a focus on low intensity rural and residential activities. The General Rural Activity Area is more permissive with regards to intensive farming, prospecting and exploration. The Hill Residential Activity Area on the other hand provides mainly for residential and other compatible activities.

6.1 Evaluation of Option A

- (141) Option A is to retain the existing zoning as General Rural Activity Area. This option would not provide for any additional residential development of the sites beyond the current use.

Table 3: Evaluation of Option A

Option A - Do Nothing (i.e. retain the existing zoning)	
Opportunities for Economic Growth and Employment	
A.1	The potential for economic growth is very limited as the existing zoning of the sites only provides for the use of the property for rural purposes and there would be only very limited additional development potential under the current zoning.
Benefits	
A.2	The existing character of the surrounding environment is maintained.
A.3	The costs associated with the Plan Change process can be avoided.
Costs	
A.4	Any potential future development of the sites would be assessed against the provisions of the General Rural Activity Area and any proposed intensification of the sites would require resource consent as a Discretionary Activity. The objectives and policies of the General Rural Activity Area are not generally supportive of intensification where the minimum net site area requirements of 15 hectares per dwelling are not met. As such, there would be significant risk and uncertainty as well as potential costs associated with the lost development opportunities for the sites.
Risk of Acting or Not Acting if there is uncertain or insufficient information about the subject matter of the provisions	
A.5	There is sufficient information about the current provisions that apply under the General Rural zoning.
Efficiency and Effectiveness	
A.6	The efficiency of this option is considered low. While some short term costs for the plan change process may be avoided any additional costs for future resource consent as well as the cost of lost development opportunities outweigh the benefits.
A.7	The effectiveness of this option is low because it would result in the sites retaining their existing zoning, which is considered to not be the most appropriate zoning to ensure the effective and efficient use of the sites. This is due to the restrictive nature of the existing

zone, which would discourage the establishment of further rural residential activities on the sites.	
Overall Assessment of Option	
A.8	This option is not recommended because it does not strike a balance between the development potential of the sites being realised and the potential costs outweighing the benefits. It is also considered that the existing zoning of the sites would result in the sites being underutilised. As such, the existing zone is considered to not meet the purpose of the RMA.

6.2 Evaluation of Option B

Table 4: Evaluation of Option B

Option B - Rezoning the sites to Rural Residential Activity Area	
Opportunities for Economic Growth and Employment	
B.1	This option provides for some economic growth as it allows for the three properties subject to this plan change to be developed for more intensive rural residential purposes. It would allow for a density of development that is consistent with the zoning of surrounding properties. The additional development potential would result in some opportunities for economic growth and employment through the dwelling construction that would arise from additional lots. However, it is recognised that these opportunities are small and limited.
Benefits	
B.2	The proposal would provide for the development of additional rural residential lots and dwellings on the sites. The enabled residential activities would be consistent with the existing character of the surrounding area, which is mostly zoned Rural Residential Activity Area and developed accordingly.
B.3	Rural activities could still be undertaken on the properties.
B.4	The density of development arising from the proposal would be comparable to what could be achieved on the residential properties to the south and east of the sites and across wide areas of Normandale.
B.5	There would be certainty associated with any further intensification of the sites as this would be considered against the existing objectives, policies and rules pertaining to the Rural Residential Activity Area.
B.6	The zone allows the Council to better meet its housing supply requirements under the National Policy Statement for Urban Development Capacity and the Urban Growth Strategy, when compared to the existing zone.

Costs	
B.7	The costs associated with the plan change process, including the preparation of expert reports to support the plan change.
B.8	There could be a minor change in the character of the local environment as land currently used for rural activities could be developed for rural residential development.
B.9	The rezoning could result in the loss of rural land within the local environment. However, this cost would be minimal as the sites do not contain highly productive soils.
Risk of Acting or Not Acting if there is uncertain or insufficient information about the subject matter of the provisions	
B.10	There is sufficient information about the current provisions that would apply under the proposed Rural Residential zoning.
Efficiency and Effectiveness	
B.11	The efficiency of this option is high because the benefits significantly outweigh the costs. The proposal would provide for a more appropriate scale of development on the sites than the status quo.
B.12	The effectiveness of this option is high because it would assist Council to meet its requirements under the NPS-UDC and targets set in Council's Urban Growth Strategy, while also meeting the purpose of the Act and the existing objectives of the District Plan.
Overall Assessment of Option	
B.13	This option is recommended as it would result in the most appropriate zoning and future use of the sites and the objectives, policies and provisions of the Rural Residential Activity Area are the more appropriate to meet statutory requirements.

6.3 Evaluation of Option C

Table 5: Evaluation of Option C

Option C: Rezoning the sites to Hill Residential Activity Area	
Opportunities for Economic Growth and Employment	
C.1	This option provides for enhanced economic growth when compared to status quo as it allows for an increase in housing when compared to what could be established on the sites under the existing zone and the proposed Rural Residential Activity Area zone. This option represents the greatest (temporary) employment and economic growth options for the sites.
Benefits	
C.2	The rezoning of the sites to Hill Residential Activity Area would allow for significantly more residential development to be undertaken than under options A and B.

- C.3 The density of development provided for by the Hill Residential zoning would be comparable to what the density on the residential properties approximately 1.5km to the south and east of the sites which are also within the Hill Residential Activity Area.
- C.4 There would be certainty associated with any further intensification of the sites as this would be considered against the existing objectives, policies and rules pertaining to the Hill Residential Activity Area.
- C.5 It would allow the Council to better meet its housing supply requirements under the National Policy Statement for Urban Development Capacity, when compared to the existing zone.

Costs

- C.6 The costs associated with the plan change process, including the preparation of expert reports to support the plan change.
- C.7 The rezoning could result in a change in character of the local environment as land that was previously used for rural activities and therefore had an open character, could be used for significantly more intensive residential development. The level of development would contrast with the lower density development situated on the surrounding properties.
- C.8 The rezoning would trigger the need for significant upgrading of the local infrastructure in the area to allow for the residential lots to have access to reticulated water and address additional wastewater and stormwater requirements. These costs could include having to widen the roading network to accommodate the traffic generation associated with the proposal.
- C.9 Substantial earthworks would be required to allow for an economic level of residential development to be achieved. Such earthworks would result in significant changes to the topography and natural form of the properties.
- C.10 The rezoning could result in the loss of rural land within the local environment. However, this cost would be minimal as the sites do not contain highly productive soils.

Risk of Acting or Not Acting if there is uncertain or insufficient information about the subject matter of the provisions

- C.11 There is sufficient information about the current provisions that would apply if the sites were rezoned to Hill Residential Activity Area.

Efficiency and Effectiveness

- C.12 While the proposal would result in the highest development potential for the sites, the efficiency of this option is low because the environmental and economic costs significantly outweigh the benefits.

Overall Assessment of Option

C.13 This option is not recommended as it could result in poor environmental outcomes due to the potential for over-development in the context of the surrounding rural residential area.

- (142) Option B (Rezone the sites to Rural Residential Activity Area) is the recommended approach for the Plan Change as it is the most appropriate way to achieve the objectives of the District Plan and provides for the most appropriate zoning of the sites subject to this plan change. It is the most efficient option because the benefits outweigh the associated costs.

7. Effects of the Proposed Plan Change

- (143) Section 32 does not require an assessment of the environmental effects associated with a plan change. However, Clause 22 (2) of Schedule 1 requires private plan changes to provide an assessment of anticipated environmental effects. In the case of this proposal, no new objectives, policies or rules are proposed. The proposed plan change seeks to rezone the properties at 190, 236 and 268 Stratton Street, Normandale from their existing zoning as General Rural Activity Area to Rural Residential Activity Area. It is proposed to rely on the existing District Plan objectives, policies and rules pertaining to the Rural Residential Activity Area to ensure that any environmental effects resulting from future development are appropriately addressed. As such, it is considered that an assessment of the potential environmental effects resulting from the proposed Plan Change would assist with assessing the appropriateness of this proposed Plan Change.
- (144) The following potential environmental effects have been considered:
- Amenity and Character Effects;
 - Traffic Effects;
 - Natural Hazard Effects;
 - Landscape, Natural Character and Ecology Effects;
 - Historical and Cultural Effects;
 - Economic Effects; and
 - Infrastructure Effects.

7.1 Amenity and Character Effects

- (145) The main character and amenity effect that would arise from the proposed plan change would be the change in dwelling density that would arise under the Rural Residential Activity Area when compared to the General Rural Activity Area. Due to the nature of the contours and the location of the plan change sites, this potential increase in building density would only be visible from the immediate surrounding properties.
- (146) The current General Rural Activity Area allows for 1 dwelling per 15 hectares. Under the Rural Residential Activity Area provisions this increases to 1 dwelling per 2 hectares. An indicative scheme plan has been prepared for the sites (Appendix 1). This indicative development plan shows the maximum number of lots that could be achieved if the sites were developed to the 2 hectare minimum lot size. Given the topography of the sites and the need to provide on-site access, the actual number of dwellings resulting from development of the sites under the Rural Residential Activity Area provisions is expected to be less than what is shown on the scheme plans. It needs to be noted that the indicative scheme plan does include the site at 301 Normandale Road, which is not subject to this private plan change request. While initially being interested, the owner of 301 Normandale no longer wishes to be part the plan change.
- (147) The density of development arising from a Rural Residential Activity Area zoning of the sites would be comparable to the development density that exists the immediate area. The sites subject to this plan change and one further neighbouring site are the only properties in the vicinity that are zoned General Rural Activity Area while the majority of the surrounding

properties are zoned either Rural Residential Activity Area or General Recreation Activity Area (Belmont Regional Park). In this regard, the density of development resulting from the proposal would be consistent with the character of the local area.

- (148) Under the existing District Plan subdivision provision 11.2.2.3, the assessment criteria for residential development that must be taken into account when considering an application for consent include:

Subdivisions should be designed in a manner which recognises and gives due regard to the natural and physical characteristics of the land and adverse effects are avoided, remedied or mitigated. (11.2.2.3(a))

- (149) This assessment criteria allows Council to consider the final form of the subdivision and to ensure that its layout, form and density is consistent with the topography of the sites and the intended character and amenity values of the local environment.
- (150) In addition, the existing permitted bulk and location standards within the Rural Residential Activity Area would limit the degree of built development on the sites. If a future dwelling does not comply with one or more of the permitted bulk and location standards, then a resource consent would be required, and the resulting environmental effects would be considered.
- (151) It is expected that earthworks would be required to enable development of the plan change sites under the proposed zone and to create suitable building areas and private access to future allotments/dwellings. While the proposed Plan Change does not include an actual development proposal or structure plan for the sites, the appropriateness of the existing earthwork provisions within the District Plan has been considered further for the sites.
- (152) Under the provisions of Chapter 14I Earthworks the following level of earthworks would be provided for as a Permitted Activity without triggering the need for resource consent (for the current General Rural Activity Area as well as the proposed Rural Residential Activity Area):
- up to a maximum volume of 50m³ of earth could be disturbed, and
 - the natural ground level may not be altered by more than 1.2m measured vertically (this includes cut or fill).
- (153) It is likely that any subdivision of the sites under a Rural Residential Activity Area would not comply with the earthwork provisions and the need for resource consent would be triggered. Under 14I 2.2.1(a) the resource consent process would allow Council to consider several effects associated with the proposed earthworks including:

(i) *Amenity Values:*

The extent to which any earthworks proposal will affect adversely the visual amenity values of the area, and the extent to which the earthworks will result in unnecessary scarring and be visually prominent.

The extent to which replanting or rehabilitation works are included as part of the proposal to mitigate adverse effects. Earthworks should not result in the permanent exposure of excavated areas.

- (154) As such, the existing earthworks standards and matters of discretion would be sufficient to assess and manage the effects of earthworks, potentially requiring changes to the design of the

earthworks or imposing conditions of consent that ensure the amenity effects from the earthworks are appropriately avoided, remedied or mitigated.

- (155) The existing District Plan provisions are considered appropriate to address any resulting effects from future subdivisions and development of the properties for residential purposes. The proposed Plan Change will not result in unacceptable character or amenity outcomes.

7.2 Traffic Effects

- (156) The potential traffic effects of the rezoning of the sites subject to this plan change from General Rural Activity Area to Rural Residential Activity Area have been assessed in the Transportation Impact Report prepared by Traffic Concepts which is attached as Appendix 2 to this report.
- (157) The report considers, analyses and assesses the impacts of the proposed rezoning and the potential additional development enabled by the plan change on the ability of Stratton Street, Normandale Street and their intersections to accommodate the increase in traffic as well as potential impacts on the wider network. The report also takes into consideration the access point to Belmont Regional Park that is located to the north of the plan change site on Stratton Street and any related traffic.
- (158) The assessment is based on the development potential shown by the indicative development plan (attached as Appendix 1 to this report).
- (159) The report finds that while the road geometry of both Stratton Street and Normandale Road has limitations that will limit capacity, safety and convenience, it also has positive effects in terms of reducing the operating speed and driver behaviour. Overall the report concludes the objective and policies of the operative District Plan can be met by the proposed Plan Change and that any potential effects are less than minor. Therefore, based on the traffic analysis contained in the report, it is concluded that any traffic effects on the safety and efficiency of the road network are being indiscernible.

7.3 Natural Hazard Effects

- (160) The sites subject to this plan change are not located within a known natural hazard area or overlay. There are no known slope stability issues at the sites. Any potential natural hazard effects would be considered through the resource consent that would arise from future subdivision. The reasons for this are as follows:
- Policy 11.1.3 requires the consideration and management of risks from natural hazards.
 - Natural hazards are a mandatory consideration for any controlled activity or restricted discretionary activity subdivision under Rules 11.2.2.2(g) and 11.2.3.1(a)(v)
 - Section 106 of the RMA applies to any subdivision on the sites. This requires specific consideration of the natural hazard risks that may arise from any redevelopment of the property.
 - Section 6(h) of the RMA applies to any resource consent application on the sites. This requires specific consideration of the natural hazard risks that may arise from any redevelopment as a matter of national importance.

- (161) Given the above information, it is considered that any potential risks from natural hazards can be appropriately addressed and managed through the existing subdivision provisions.

7.4 Landscape, Natural Character and Ecology Effects

- (162) The sites subject to this plan change are not subject to any specific landscape restrictions within the operative plan nor have they been identified as containing any Outstanding Natural Features and Landscapes within the recent Ecology and Landscapes project.
- (163) Two of the three properties subject to this proposed Plan Change (190 and 236 Stratton Street) are partly affected by an identified SNR (SNR38 – Normandale Road Bush). Chapter 14E includes objectives, policies and rules to protect identified SNRs from inappropriate subdivision, use and development. However, as a result of two Environment Court decisions from 2004 the rules do not apply to identified SNRs on private land.
- (164) The recent Ecology and Landscape project undertaken by Council identified two potential areas of significance on the sites subject to this proposed Plan Change (190 and 268 Stratton Street), which don't align with the areas currently identified in the plan. However, Council decided not to introduce any mandatory restrictions on private land. The identified potential areas of significance on the plan change sites have not been confirmed or amended by way site visits. Therefore, no restrictions apply to the removal of vegetation on these sites. To facilitate development on the sites, earthworks would be required for access arrangements, house platforms, and services installation. As outlined above any permitted earthworks in the General Rural Residential Activity Area are limited to a maximum volume of 50m³ and an alteration of existing ground levels by up to 1.2m. Given the scale of the earthworks required to facilitate a subdivision, these provisions would likely not be complied with and resource consent would be required.
- (165) The District Plan seeks to ensure that earthworks do not result in unnecessary scarring of the landscape and removal of vegetation. This is supported through Policy 14I 1.1(a) and (b):
- (a) *To ensure that earthworks are designed to be sympathetic to the natural topography.*
 - (b) *To protect significant escarpments, steep hillside areas, and the coastal area by ensuring that earthworks are designed to retain the existing topography, protect natural features and prevent erosion and slips.*
- (166) The resource consent process would allow for the Council to consider several effects associated with the proposed earthworks including under 14I 2.2.1(a):
- (ii) *Existing Natural Features and Topography:*
The extent the proposed earthworks will alter the natural topography. Earthworks in these activity areas should be designed to retain the natural topography and protect natural features.
- (167) This would allow Council to require changes to the design of the earthworks or impose conditions of consent that ensure the environmental effects from the earthworks in relation to natural character are appropriately managed.

- (168) It is considered that given these existing District Plan provisions pertaining to earthworks, any resulting effects from the development of the sites for residential purposes can be appropriately addressed and managed.

7.5 Historical and Cultural Effects

- (169) The sites subject to this plan change have not been identified in the District Plan as containing any sites of historical or cultural significance.
- (170) As part of the preparation of this private plan change request, consultation has been initiated with local iwi, yet so far no formal feedback has been received.

7.6 Economic Effects

- (171) While the economic effects of the proposed Plan Change have not been quantified, they are considered to be positive. The proposed Rural Residential Activity Area would allow for a greater intensity of development on the sites. This means an increased yield in the number of properties, and therefore an increased number of people living in the local area, which would assist with supporting the local shops as well as retail, service and commercial businesses in the wider environment.
- (172) The proposed Rural Residential Activity Area only provides for a limited range of non-residential activities to be established on a site. The nature of non-residential activities that can be established within the Rural Residential Activity Area are similar to those provided for in the General Rural Activity Area. As such, the proposed Plan Change will not result in a significant change in the type non-residential activities that could occur on the sites when compared to the existing situation or have detrimental economic effects on existing commercial centres.
- (173) It is therefore considered that the proposed Plan Change would have positive economic effects.

7.7 Infrastructure Effects

- (174) Given the location in a rural environment the sites subject to this plan change are not connected to Council sewer, water or stormwater services in the local area. As such, any new development sites resulting from a future subdivision will need to provide on-site services. Any future subdivision application will need to demonstrate that the sites are able to accommodate these services at the time of subdivision.
- (175) Wellington Electricity has advised that the existing lines that service the plan change sites would require upgrading at the time of subdivision of any of the sites. The cost of this upgrade would be approximately \$300,000 to \$400,000. These potential costs have been acknowledged and accepted by the plan change requestors.
- (176) It is therefore considered that the rezoning of the sites to Rural Residential Activity Area would not result in any inappropriate infrastructure effects.

7.8 Conclusion

- (177) Overall, it is considered that any potential adverse effects resulting from the proposed rezoning and any future subdivision and development enabled by the proposed Plan Change can be adequately managed under the existing objectives, policies and rules contained in Chapters 8A, 11 and 14 of the District Plan.

8. Conclusion

- (178) The proposed Plan Change seeks to rezone the properties at 128, 236 and 268 Stratton Street, Normandale from General Rural Activity Area to Rural Residential Activity Area under the City of Lower Hutt District Plan.
- (179) No new or amendments to existing District Plan provisions e.g. objectives, policies, rules or standards are proposed by the proposed Plan Change. The only amendments which will need to be made will be to District Plan Maps B3 and R1 to reflect the zone change.
- (180) Any potential effects arising from future subdivision and development of the sites as enabled by the Rural Residential Activity Area can be appropriately addressed and managed through the existing objectives, policies and rules of the District Plan.
- (181) The proposed Plan Change is consistent with the relevant provisions of the RMA and gives effect to any relevant National Policy Statements, the National Planning Standards and the Regional Policy Statement for the Wellington Region.
- (182) The proposed Plan Change has been evaluated under the requirements of Section 32 of the RMA and is the best available means to achieve the objectives and the sustainable management purpose of the RMA.

Appendix 1 – Indicative Concept Plan



SCHEME PLAN - LOT SIZES
LOTS 1-24 BEING A SUBDIVISION OF LOTS 1 AND 2 DP 50184,
SECTION 43 NORMANDALE SETT AND LOT 16 DP 53631. BEING
190,236 & 268 STRATTON STREET AND 301 NORMANDALE ROAD.

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DO NOT SCALE	
Drawn Date:	APR 2019:
Compiled In:	XXX
Territorial Authority:	LOWER Hutt City Council
Scale:	Ref: 013 1904 001

Appendix 2 – Transportation Impact Assessment



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07 November 2019

Ref: 0661

James Beban
Urban Edge
PO Box 39071
Wellington Mail Centre
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Dear James

Plan Change – 190, 236, and 268 Stratton Street – Normandale - Hutt City Transportation Impact Report

Following from your instructions and site visits, I have now completed my analysis of the private plan change to rezone rural land (General Rural Activity Area) at 190, 236 and 268 Stratton Street into rural residential land (Rural Residential Activity Area). The plan change will seek to change the existing rural land zoning so it can be subdivided into smaller rural residential lots.

My analysis of the site and related traffic matters has included site visits, discussions with the applicant and their representatives, review of the roading environment, analysis of the planning framework and an assessment of impacts are provided below. This Transportation Impact Assessment (“TIA”) forms part of the documentation for the private plan change.

The key transportation considerations of the private plan change are:

- the ability of Stratton Street to accommodate the increase in traffic as a result of rezoning the land from rural to rural residential;
- the ability of the intersection of Stratton Street and Cottle Park Drive to safely and efficiently accommodate the increased use as a result of the plan change, and

- consideration of the wider network effects as a result of increased development.

The analysis and assessment provided below considers the potential impacts of the private plan change.

1. Site Location and Description

The site is located at across three properties being 190, 236 and 268 Stratton Street in Normandale, Hutt City.

Figure 1 shows the site location and the surrounding road network.

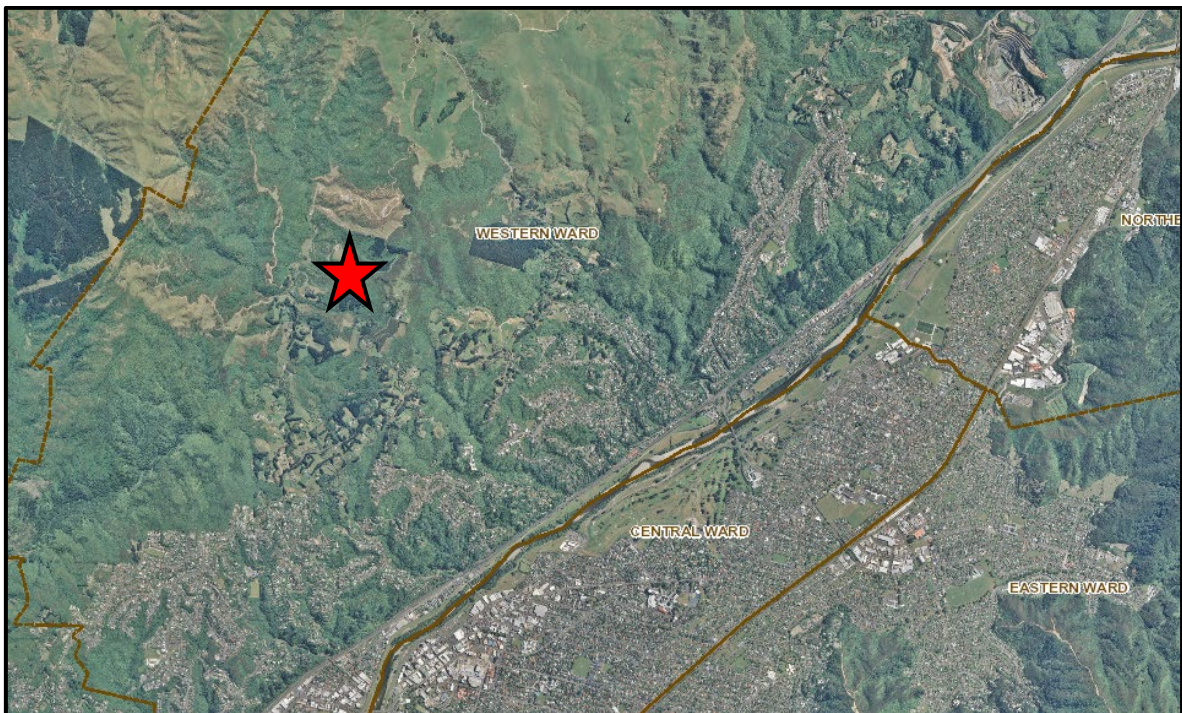


Figure 1: Site Location. (Source: Hutt City Maps)

As shown the site is located on the western Hutt hills in an area that has a combination of rural land and rural residential land. The residential urban fringe is also located close by as are the Maungaraki Shops.

To the north of the plan change area on Stratton Street is the Belmont Regional Park which has an access point from Stratton Street. Belmont Regional Park provides a number of recreational opportunities including walking, horse riding and mountain biking.

Figure 2 shows the topography of the land that is within the plan change area looking south from the northern part of 268 Stratton Street.



Figure 2: Site Topography looking south

The land within the plan change area would be described as rolling to relatively steep with a mixture of scrub, mature trees and grazing paddocks over the three titles.

The plan change area has Stratton Street along its western boundary and parts of Normandale Road along its eastern Boundary. Stratton Street connects to Miromiro Road which provides the road linkage to the Hutt City valley floor through Normandale Road that connects to Ewen Bridge.

To the west Miromiro Road connects to Dowse Drive that links through to State Highway 2 which provides wider connections to the Wellington Region and the valley floor.

Miromiro Road, Normandale Road and Dowse Drive form part of the arterial road network and are listed as Secondary Collector roads in the Hutt City District Plan. Their function is to link areas of population and economic sites. Stratton Street, Cottle Park Drive and the section of Normandale Road along the plan change area are Access Roads as defined by the Hutt City District Plan.

All the adjacent roads have a posted speed limit of 50 km/h with Stratton Street and Normandale Road along the plan change boundaries also having a posted speed limit of 50 km/h even though they are rural residential in character and would normally have a higher speed limit.

Figure 3 shows a closer aerial view of the plan change areas and adjacent roads.

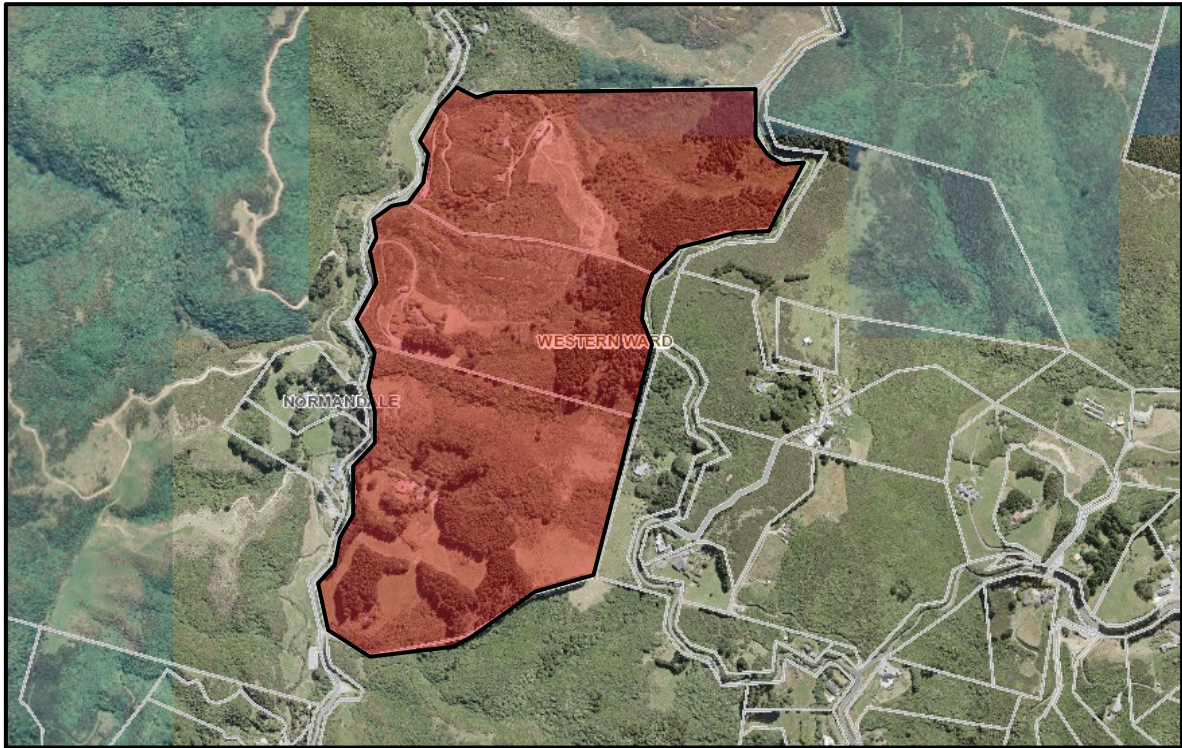


Figure 3: Plan Change Area. (Source: Hutt City Maps)

As shown, there are three large sites that make up the private plan change area. Each of the sites have one existing dwelling within its boundaries which are accessed from Stratton Street. The northernmost property (268 Stratton Street) also has road frontage to Normandale Road.

The intersection of Stratton Street and Cottle Park Drive is around 1.2 km from the southern end of the plan change area. The plan change area is around 6.5 km from the central area of Hutt City.

2. Road Environment

Stratton Street from its intersection with Miromiro Road to its intersection with Cottle Park Drive is around six metres wide and provides for two-way traffic. This first section of Stratton Street has a number of straight sections with some moderate curves and a posted speed limit of 50 km/h which is also the estimated operating speed.

The on-street parking demand is low with all houses along this section of Stratton Road having off street car parking for at least two vehicles.

This section of Stratton Street is marked with a dashed centreline. There is a footpath along the western side of the road for around 180 metres along with kerb and channel along both sides of the road. From the end of the footpath Stratton Street has no kerb and channel with edge lines marked on both sides of the road. There is no footpath along the remaining northern section of Stratton Street.

The intersection of Stratton Street and Cottle Park Drive controlled by give way signs with Stratton Street traffic required to give way to the through traffic moving along Cottle Park Drive.

Figure 4 shows a sight distance looking south towards Miromiro Road from the intersection of Stratton Street and Cottle Park Drive.



Figure 4: Sight distances looking south from the intersection of Stratton Street and Cottle Park Drive

The measured sight distance to the south is around 80 metres which will allow motorists to exit Stratton Street safely as they head towards Miromiro Road. Note that the power pole is located close to the road edge which slightly limits the sight distance for motorists exiting out of Stratton Street.

Figure 5 shows a sight distance looking north along Cottle Park Drive from the intersection of Stratton Street and Cottle Park Drive.



Figure 5: Sight distances looking north from the intersection of Stratton Street and Cottle Park Drive

The measured sight distance to the north on Cottle Park Drive being around 75 metres. This is sufficient distance for vehicles to exit Stratton Street safely. The vertical curve limits the sight distance in this direction.

Accordingly, the sight distances at the intersection are sufficient for vehicles to enter and exit Stratton Street safely based on the operating speed along the section of the road.

The next section of Stratton Street from the intersection with Cottle Park Drive to the plan change area is noticeably different to the first section of Stratton Street. The geometry is typical of a rural road that moves through rolling to steep land that provides access to property. Some sections of the road are relatively straight with other parts of the road having relatively tight low-speed curves.

The nature of this section of Stratton Street along with its relatively tight road geometry effectively lowers the operating speed down to around 30 km/h with some other longer straight sections being as high as 40 km/h. This provides an environment where road users can move safely along the road.

The road varies in width with its average width being around 4.5 metres between the edge lines.

Figure 6 shows the general road environment of Stratton Street North of its intersection with Cottle Park Drive.



Figure 6: Road environment along Stratton Street (straight section)

There are narrow road shoulders on each side of the road along with edge lines on both sides and isolated marker posts to provide extra delineation on curves.

Figure 7 shows another section of Stratton Street where the road alignment is tighter as a result of the relatively sharp bends in the road.



Figure 7: Road environment along Stratton Street (curve section)

Some of the corners have some additional widening to accommodate the swept part of vehicles negotiating the curves. There is also a narrow shoulder along both sides of the road at these locations which varies in width. The operating speed along the sections of Stratton Street are significantly lower than the posted speed limit and are estimated to be around 25 km/h.

Normandale Road is similar in nature to the northern part of Stratton Street and carries much lower traffic volumes.

Figure 8 shows the general road environment Normandale Road.



Figure 8: Road environment along Normandale Road

As with Stratton Street, parts of Normandale Road are marked with edge lines on both sides of the road with each marker posts provided on some curves. As you head further north on Normandale Road, the level of road delineation reduces with generally only marker posts provided.

The road is of a similar width to the northern part of Stratton Street and there is no footpath with kerb and channel along its length. As with Stratton Street the general road alignment and geometry provide a speed environment that is less than 40 km/h. This allows the road to operate safely.

3. Traffic Environment

Stratton Street is a typical rural road located on the edges of the urban road network that provides access to private property. The level of development along Stratton Street from Cottle Park Drive is a mixture of rural residential lots, rural properties and at its northern end the Belmont Regional Park.

There are around 15 dwellings on Stratton Street from Cottle Park Drive which are roughly equally spread along the road.

Stratton Street has a number of different road users including pedestrians, horses and cyclists which share the road with vehicles. All users of the road are aware of the traffic environment that Stratton Street provides which leads to these users being alert and using the road with care. This is demonstrated by the very low number reported crashes as noted later in this report.

The availability of traffic data for this road is very limited with Hutt City Council having no recorded traffic counts and only estimated volumes in the RAMM asset management system. Fortunately, Wellington Regional Council has traffic count data as part of understanding the use of the Belmont Regional Park.

The traffic counter was located at the entrance to the Regional Park and recorded the number of vehicles entering and exiting the recreational area from 18 July 2019 to 30 September 2019. The average seven-day count was 35 vehicles per days with most traffic being recorded between 8 am and 6 pm. In reviewing the traffic count data further, the use of Belmont Regional Park can be seen with the average weekend flows being around 63 vehicles per day, with the weekday flows being much lower at around 25 vehicles per day. It should be noted that the traffic counter did not record the flows generated by the other land uses on Stratton Street, south of the Belmont Regional Park.

As set out later in this report the expected traffic generation from the existing houses (15) on Stratton Street is estimated to be around 90 trips per day or around 10 vehicle movements in the peak hour. Therefore, the total number of existing movements on southern part of Stratton Street before the intersection of Cottle Park Drive would be around 110 vehicles per day during the week and around 160 vehicles per day in the weekend.

4. Public Transport

There is public transport available via the Route 150 bus service that travels between Petone Railway Station and Hutt Central that also connects through to Kelson. The service runs approximately every 30 minutes with a bus stop at the intersection of Stratton Street and Miromiro Road.

These services provide public transport links between the plan change area the wider Wellington area via the excellent bus and train services.

5. Crash History

A detailed search of the NZTA crash database was carried out for the five-year period from 2014 to 2018, along with the part year of 2019. The search area included all crashes along Stratton Street to its intersection with Miromiro Road. A search of crashes on the northern part of Normandale Road was also included.

There have been two reported crashes on Stratton Street since 2014. There was a non-injury crash in 2015 and a serious injury crash in 2019 along Stratton Street. There have been no reported crashes on the northern part of Normandale Road.

Table 1 provides details of each of the reported crashes that have occurred along Stratton Street from its intersection with Miromiro Road to its northern end at the entrance to Belmont Regional Park.

Road	Location	Date	Collision Reference	Accident Description	Severity
Stratton Street	180 metres north of Miromiro Road.	15/06/2015	201537957	A motorist trying to avoid police lost control of the vehicle on a left-hand corner spun 180° and hit a bank. Driver fled the scene and was caught later.	Non-Injury
	540 metres north of Cottle Park Drive.	26/04/2019	201953138	Motorcyclist travelling about 40km/h coming down Stratton Street. Hit some gravel on the road and the bike slid. He came off and bike hit bank on the opposite side of the road.	Serious

Table 1: Crash History 2014 – 2019: (Source: NZTA)

The crash history shows that there are no inherent safety deficiencies with Stratton Street based on crash history. The crash in 2015 was a consequence of a driver trying to avoid police. The crash in 2019 was related to the loose gravel on the road which a regular user of Stratton Street lost control on.

The low crash history suggests that the design environment of Stratton Street and Normandale Road provides a safe environment for the users of these roads. As noted above, the alignment and general road geometry of Stratton Street is challenging and encourages drivers to be more alert and drive slowly. The existing layout of Stratton Street results in a relatively safe driving environment even though it has some geometric road deficiencies.

6. Private Plan Change

The proposed private plan change seeks to rezone the existing rural land into rural residential land which will allow for an increase in density and the number of houses that will have access onto Stratton Street.

A concept plan has been developed showing the potential number of lots that could be developed within the area that forms the private plan change. The concept plan only provides an indication of potential lots and their sizes and should not be treated as the expected number of lots or even the design or density of the future subdivisions. It has been provided to allow the analysis of the potential implications of rezoning the land.

It should be noted that the area shown as Lot 24 (301 Normandale Road) was part of the original private plan change area, however the landowner of this property is no longer wanting to be part of the private plan change.

The current concept plan has all access to the new 23 lots via internal right-of-way's within the plan change area or direct access to either Stratton Street or Normandale Road. The rights of way have been designed to connect in locations on Stratton Street where there are good sight distances to ensure safe and convenient access. Six of the new lots will have direct access onto Normandale Road.

There are no plans to form new roads as part of the private plan change area with all traffic accessing the wider road network via Stratton Street (most of the development area) or Normandale Road.

Figure 9 shows the concept rural residential subdivision layout plan.



Figure 9: Concept Lot Layout Plan. (Survey Insight Ltd)

For the purpose of the analysis the potential traffic effects of the plan change area has assumed 23 lots for traffic generation, trip distribution and any other network implications that may need to be considered. It should be noted that it is likely that a lower number of rural residential lots will be developed. Therefore, basing the analysis on 23 lots is likely to overstate any potential effects.

7. Impact Analysis

This section looks at the key transportation elements of the private plan change and provides an analysis and assessment of their implications.

7.1. Planning Framework

The development of the plan change area is expected to meet the Policies and Objectives as well as the Transport Rules and Standards contained in Section 14A – Transport of the District Plan.

Where particular provisions, rules or standards are not met, that particular development will need to apply for resource consent and provide the appropriate assessment of effects due to those non-compliances.

In regard to the Objectives (14A 3) and Policies (14A 4) contained within Section 14A of the District Plan the following analysis of the relevant parts has been provided below.

Objective 14A 3.1

A safe, efficient, resilient and well-connected transport network that is integrated with land use patterns, meets local, regional and national transport needs, facilitates and enables urban growth and economic development, and provides for all modes of transport.

The private plan change is local on the fringe of the urban area and next to rural residential land. Stratton Street is well connected to the wider road network via Miromiro Road and Normandale Road which are both listed as Collector Roads. Good public transport is available via Miromiro Road and the wider public transport network via transport hubs on the Lower Hutt railway line and interchanges at Hutt Central.

Stratton Street operates safely and there are no capacity constraints at nearby intersections to the wider road network.

Objective 14A 3.4

Adverse effects on the safety and efficiency of the transport network from land use and development that generate high volumes of traffic are managed.

The private plan change will not generate high traffic flows with the number of new movements in the network expected to be around 140 trips per day which will split across Stratton Street and Normandale Road.

The low number of movements can be accommodated on the adjacent road network with no noticeable changes in the level of service relating to safety or efficiency.

Objective 14A 3.5

Adverse effects on the safety and efficiency of the transport network from on-site transport facilities (vehicle access, parking, manoeuvring and loading facilities) are managed.

The site will be required to meet best practice guidelines with regard to sight distances and their formation. All access points will be able to meet these guidelines.

All parking and manoeuvring for the new lots will be provided within the site boundaries and there will be no effects on other road users.

Policy 14A 4.1

Additions and upgrades to the transport network should seek to improve connectivity across all modes and be designed to meet industry standards that ensure that the safety, efficiency and resilience of the transport network are maintained.

Stratton Street and Normandale Road have limitations with regard to the road alignment and width. The combination of these two elements provides a road environment that allows the existing different types of users to traverse Stratton Street and Normandale Road safely and with relative ease. There will need to be some minor

improvements to certain curves to improve forward sight distance and to allow opposing traffic to pass each other more easily.

These can be carried out within the available road reserve.

It should be noted that any improvements will improve the convenience for the users of the road. They are not needed to address any safety or capacity constraints.

Policy 14A 4.2

Land use, subdivision and development should not cause significant adverse effects on the connectivity, accessibility and safety of the transport network, and, where appropriate, should:

- *seek to improve connectivity within and between communities; and*
- *enable walking, cycling and access to public transport.*

The private plan change area will not adversely affect connectivity, accessibility or safety of the transport network.

Policy 14A 4.3

The transport network should be located and designed to avoid, remedy or mitigate adverse effects on the adjacent environment.

The private plan change area will not adversely affect the adjacent environment.

Policy 14A 4.4

Land use, subdivision or development containing noise sensitive activities should be designed and located to avoid, remedy or mitigate adverse effects which may arise from the transport network.

The private plan change will only have a small increase in the amount of traffic, and it will have no adverse effects.

Policy 14A 4.5

Any activity that is a High Trip Generator must be assessed on a case by case basis. Adverse effects of High Trip Generators on the safety and efficiency of the transport network should be managed through the design and location of the land use, subdivision or development.

The private plan change seeks to change rural land to rural residential land which is not a high traffic generator.

Policy 14A 4.6

Vehicle access, parking, manoeuvring and loading facilities should be designed to standards that ensure they do not compromise the safety and efficiency of the transport network.

The site accesses for the new lots along with any parking and manoeuvring will be able to meet best practice design guides. Any effects on the transport network will be indiscernible due to the low number of movements and the safe environment provided by Stratton Street and Normandale Road.

Policy 14A 4.7

The transport network, land use, subdivision and development should provide for all transport modes.

The private plan change area will provide for all appropriate transport modes.

7.2. Traffic Generation

The NZTA Research Report 453: Trips and Parking Related to Land Use (November 2011) provides trip generation rates for various land use categories. This report describes residential properties generating 10.4 vehicle trips per dwelling per day. This rate is largely based on a dwelling located in large urban areas and does not reflect the travel patterns of rural residential living. To that end the report also states, that:

“...lower trip generation rates have typically been found in more rural subdivisions. Surveys near Queenstown and Christchurch indicates daily rate of between 6 and 8 vpd (in + out) per household reflected the increased trip linking which occurred when the primary employment trip was longer...”.

More recently surveys conducted with respect to rural residential developments were carried out in order to determine the more appropriate trip generation rate for rural residential development. Traffic counts at three locations in Nelson and one in Marlborough have been studied. These locations include rural residential developments and specific cul-de-sacs. The areas of surveys were Permin Road, Redvale Road, Ridgeview Road and Marlborough Ridge Drive. Trip generation rates that were surveyed resulted in trip rates between five to seven vehicles per dwelling per day. Surveys have also been carried out on more urban areas in Nelson and Wellington which show a trip generation rate of six trips per dwelling as well.

Considering the Research Report 453 as well as the traffic surveys noted above, a trip generation rate of six vehicles trips per dwelling per day has been assumed for the new lots that will be formed as part of the private plan change area.

Based on the total number of lots within the plan change area being 23, the expected total number of daily traffic movements will be around 140 vehicles which will be equivalent to 14 vehicles per hour at the peak times.

The concept plan shows around 17 lots with access onto Stratton Street and six lots with access onto Normandale Road. Based on the assumptions of six trips per lot the increase in traffic flows on Stratton Street will be around 100 vehicles a day or around 10 vehicles per hour at peak times. Normandale Road will see an increase in traffic flows of around 40 vehicles per day or four vehicles per hour at peak times

7.3. Trip Distribution

The new lots that have access to Stratton Street are expected to use the intersection of Stratton Street and Miromiro Road and then head west to access the wider road network via Dowse Drive to State Highway 2 or Miromiro Road to access Hutt Central.

It is expected that the new trips generated from the Stratton Street lots will be split approximately equally between Dowse Drive and Miromiro Street.

The new lots that have access to Normandale Road have a number of options to access the wider road network which includes Normandale Road, Cottle Park Drive to Stratton Street, Miromiro Road and Dowse Drive. It is expected that the new trips generated from the Normandale Road lots will be equally dispersed over the different route choices.

7.4. Road Capacity and Intersection Performance

The total increase in the number of traffic movements across the wider road network is expected to be around 14 vehicles in the peak hour which is very low and can be easily absorbed into the adjacent road network with no discernible difference to other road users.

There are no capacity issues at adjacent intersections and the increase of 14 vehicle movements in the peak hour will have no effect across the wider road network.

As more vehicles use Stratton Street and Normandale Road there will potentially be more interactions between the same and different road users that will lead to slight inconveniences such as slowing down or waiting. These occurrences are less than minor and would not impact on the capacity of the road at the level the plan change will result in.

7.5. Safety

As noted above, the private plan change will not make any discernible change in the levels of safety along Stratton Street, Normandale Road or the wider road network.

This is mainly due to the road geometry align effectively constraining the operating speed along Stratton Street and Normandale Road. There are good sight distances at the key intersections that will allow new vehicles to the road network to access the wider network safely.

8. Road Improvements

The existing northern part of Stratton Street from Cottle Park Drive has some constraints that would benefit from improvements for the existing users of the road as well as future users arising from the plan change proposal as well as anticipated growth in the use of Belmont Park.

These improvements would consist of isolated curve widening and vegetation removal to improve sight distances and passing on some of the tighter curves. This would need to be done carefully because the current road alignment provides an excellent measure to control vehicle speeds.

9. Conclusion

The private plan change seeks to rezone rural land to rural residential land that sits on the fringe of more intensive urban land at the top of Normandale. A concept plan of the potential future subdivision shows that 23 lots could be established across three land titles.

The access to the plan change area is via the northern part of Stratton Street and Normandale Road which have easy access to the wider road network via Miromiro Road, Normandale Road and Dowse Drive.

The road geometry of both Stratton Street and Normandale Road has limitations that will limit capacity, safety and convenience. The road geometry also has positive effects in terms of reducing the operating speed and driver behaviour. This is reinforced by the low number of reported crashes along Stratton Street and Normandale Road.

The plan change area is expected to generate around 14 additional vehicles above the existing flows in the peak hour. The existing traffic flows along Stratton Street are around 25 vehicles during the week and 65 vehicles during the weekend (higher flows are due to Belmont Regional Park). The weekday peak flows after the plan change area is developed is expected to be around 40 vehicles per hour. These are very low flows at around one vehicle every one to two minutes.

Generally, the Objective and Policies of the Hutt City District Plan are able to be met by the proposed plan change confirming that any potential effects are less than minor.

Overall based on the traffic analysis above, it is concluded the plan change can be accommodated with any traffic effects on the safety and efficiency of the road network being indiscernible.

We are happy to provide any further clarification if required.

Regards



Gary Clark

Director

NZCE (Civil), REA, MIPENZ, CPEng

Part 5: Submission Form

Submission on publicly notified Proposed District Plan Change

Clause 6 of the First Schedule, Resource Management Act 1991



To: Chief Executive, Hutt City Council

1. **This is a submission from:**

Full Name	<i>Last</i> <i>First</i>	
Company/Organisation		
Contact <i>if different</i>		
Address	<i>Number</i> <i>Street</i>	
	<i>Suburb</i>	
	<i>City</i> <i>Postcode</i>	
Address for Service <i>if different</i>	<i>Postal Address</i>	<i>Courier Address</i>
Phone	<i>Home</i>	<i>Work</i>
	<i>Mobile</i>	
Email		

2. This is a **submission** on the following proposed change to the City of Lower Hutt District Plan:

Proposed District Plan Change No:

Title of Proposed District Plan Change:

3.a I ☐ **could** ☐ **could not** gain an advantage in trade competition through this submission
(Please tick one)

3.b *If you could gain an advantage in trade competition through this submission:*

I ☐ **am** ☐ **am not** directly affected by an effect of the subject matter of that submission that–

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

(Please tick one)

Note: If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

4. The specific provisions of the proposal that my submission relates to are:

Please give details:

(Please use additional pages if you wish)

5. My submission is:

Please include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views:

(Please use additional pages if you wish)

6. I seek the following decision from Hutt City Council:

Please give precise details:

(Please use additional pages if you wish)

7. I ☐ **wish** ☐ **do not wish** to be heard in support of my submission

(Please tick one)

8. If others make a similar submission,

I ☐ **will** ☐ **will not** consider presenting a joint case with them at the hearing.

(Please tick one)

Signature of submitter
(or person authorised to sign
on behalf of submitter)

	<i>Date</i>
--	-------------

A signature is not required if you make your submission by electronic means

Personal information provided by you in your submission will be used to enable Hutt City Council to administer the submission process and will be made public. You have the right under the Privacy Act 1993 to obtain access to and to request correction of any personal information held by the Council concerning you.