

Proposed Private District Plan Change 53

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

Summary of Decisions Requested and Full Set of Submissions

Publicly Notified:

17 March 2020

Further Submissions Close:

31 March 2020

Public Notice

Public Notification of the Summary of Decisions Requested for Proposed Private District Plan Change 53 to the City of Lower Hutt District Plan

Clause 8 of the First Schedule – Part 1 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 prepared the Summary of Decisions Requested for Proposed Private District Plan Change 53.

The purpose of the proposed plan change is to provide for rural residential development at 190, 236 and 268 Stratton Street, Normandale. 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 provisions of the District Plan are proposed.

The proposed plan change was notified for submissions on 14 January 2020. The submission period closed on 12 February 2020. Seven submissions were received.

The Summary of Decisions Requested and Full Set of Submissions can be viewed:

- on Council's website: huttcity.govt.nz/pc53
- at all Hutt City Council Libraries
- 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
- Email: district.plan@huttcity.govt.nz

The following persons can make a further submission in support of, or in opposition to, the submissions already made:

- Persons who are representing a relevant aspect of the public interest; and
- Persons who have an interest in the proposed plan change that is greater than the interest of the general public.

A further submission must be limited to a matter in support of or in opposition to the relevant submission. It must be written in accordance with Form 6 of the Resource Management (Forms, Fees and Procedure) Regulations and must state whether or not you wish to be heard in support of your submission at a hearing.

Further submission forms (Form 6) are available:

- on Council's website: huttcity.govt.nz/pc53
- at all Hutt City Council Libraries
- at the Customer Services Counter, Council Administration Building, 30 Laings Road, Lower Hutt

If you make a further submission, please state clearly the reference number of the submission to which your further submission relates.

Further Submissions close on 31 March 2020

Further 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

In addition to serving a copy of the further submission on Hutt City Council, a copy of the further submission must also be served on the person(s) whose submission(s) you are supporting or opposing within five working days of sending your further submission to Hutt City Council.

Jo Miller
Chief Executive

17 March 2020

Summary of Decisions Requested

DPC53/1 Alan and Joyanne Stevens				
Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
1.1	Transport network	Not stated	A full investigation of traffic effects.	<p>Submitter comments on:</p> <ul style="list-style-type: none"> Effects of development on the transport network, particularly: <ul style="list-style-type: none"> Effects on pedestrians and cyclists accessing Belmont Regional Park, and Effects of high speed vehicles down Cottle Park Drive at the intersection of Cottle Park Drive and Stratton Street. How traffic effects would be mitigated, and The section 32 evaluation for the proposal regarding effects on the transport network.
1.2	Transport network	Not stated	Implementation of mitigation measures for traffic effects, including improved sight lines, road widening, no parking lines, clearways, traffic control during development phases for all sites.	
1.3	Transport network	Not stated	Identification of who pays for the necessary upgrades to roads.	

DPC53/2 Royal Forest and Bird Protection Society of New Zealand Inc				
Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
2.1	Biodiversity Waterbodies	Oppose	Reject the proposal.	<p>Submitter comments on:</p> <ul style="list-style-type: none"> Protection of significant natural areas and biodiversity values, The potential loss of natural habitats, The effects on freshwater, Councils function to maintain indigenous biodiversity, The appropriateness of leaving consideration of effects to a resource consent process, and The section 32 evaluation for the proposal.

DPC53/3 Karen Self				
Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
3.1	Transport network	Not stated	Subdivision enabled by the proposed plan change is not accessed from Normandale Road past the current Old Coach Road gated entrance to Belmont Regional Park.	Submitter comments on: <ul style="list-style-type: none"> • Effects of development on the transport network, particularly Normandale Road, • Effects of development on the amenity of Old Coach Road, and • The section 32 evaluation for the proposal regarding effects on Normandale Road.
3.2	Transport network	Not stated	Council decisions are fully informed by further in-depth traffic studies of Normandale Road from 237 to 308 Normandale Road, and beyond the entrance to Belmont Regional Park if lots are to be accessed from this area. The Council needs to consider further the impact on infrastructure if the rezoning and subsequent proposed subdivisions take place. Specific consideration be given to roads, as I believe no upgrades or improvements are currently intended.	
3.3	Biodiversity	Not stated	Creation of a regenerated native bush corridor from a strip of the subdivided lots along the current Old Coach Road to the join the two sections of Belmont Regional Park.	

DPC53/4 Matthew Willard				
Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
4.1	Transport network	Not stated	Council ensures that the risks to the safety of the transport network are reduced so far as is reasonably practicable and that Council adopts a philosophy of avoidance of all avoidable risks. Council should review the need to improve safety on	Submitter comments on: <ul style="list-style-type: none"> • The safety of the transport network, particularly: <ul style="list-style-type: none"> ○ The safety of the existing transport network, ○ The effects of increased traffic users on the safety of the transport network,

			Stratton Street considering the need to avoid all avoidable risks.	<ul style="list-style-type: none"> ○ Access to properties from Stratton Street, and ○ Safety of non-vehicular road users, and • The section 32 evaluation for the proposal regarding effects on the transport network.
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DPC53/5 Peter and Sandra Matcham

Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
5.1	General	Not stated	<p>Revision of the application to correctly reflect the actual situation, with planned subdivisions redrawn in a way that better reflects the actual topography and provides a realistic evaluation of effects on the environment and locale.</p> <p>Development that provides robust and transparent measures to protect the natural, social and recreational environment of the area.</p>	<p>Submitter comments on:</p> <ul style="list-style-type: none"> • Effects on the transport network, • Effects on amenity and character, • Landscape, natural character and ecological effects, • Identification and protection of biodiversity, • Freshwater management and effects on waterbodies, • Kaitiakitanga and the ethic of stewardship, and • The section 32 evaluation for the proposal, including: <ul style="list-style-type: none"> ○ The description of the site and surrounding area, ○ The scale and significance assessment, ○ The quantification of effects, ○ The policy framework, ○ The evaluation of options, ○ The assessment of effects, and ○ Consultation.
5.2	Biodiversity	Not stated	Identification and protection of significant natural areas.	

DPC53/6 Friends of Belmont Regional Park

Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
6.1	General	Not stated	Reject the proposal in its present form and amend the proposal to include a robust analysis of environmental effects sufficient to allow any measures necessary to	<p>Submitter comments on:</p> <ul style="list-style-type: none"> • Effects on the transport network,

			avoid or mitigate these to be defined.	<ul style="list-style-type: none"> • Visual effects and effects on amenity values, including those of the Belmont Regional Park, • Reverse sensitivity effects, • Landscape, natural character and ecological effects, • Freshwater management and effects on waterbodies, and • The section 32 evaluation, including: <ul style="list-style-type: none"> ○ The description of the site and surrounding area, ○ The scale and significance assessment, ○ The quantification of effects, ○ The policy framework, ○ The evaluation of options, ○ The assessment of effects, and ○ Consultation.
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DPC53/7 Pam Guest and Peter Shaw				
Sub. Ref.	Topic	Support / Oppose	Decision Requested	Comments
7.1	Transport network	Not stated	Include conditions that protect the health and safety of local roads.	<p>Submitter comments on:</p> <ul style="list-style-type: none"> • Effects on the transport network, • Effects on significant indigenous vegetation and significant habitats of indigenous fauna, • Effects on waterbodies and riparian margins, and • The section 32 evaluation for the proposal regarding: <ul style="list-style-type: none"> ○ Effects on the transport network, and ○ Significant natural areas.
7.2	Transport network	Not stated	If the proposal is accepted, that Council recognises the risks of higher conflict on roads from an increasing population and prepares an appropriate traffic management plan.	
7.3	Biodiversity	Not stated	Include conditions that protect the areas that have already been identified as having, or potentially having, significant indigenous vegetation and significant habitats of indigenous fauna.	
7.4	Waterbodies	Not stated	Include conditions that protect streams and their riparian margins.	

Full Submissions

From: Joyanne Stevens <joyannestevens@hotmail.com>
Sent: Tuesday, 11 February 2020 9:20 AM
To: Corporate Records
Subject: Proposed Plan Change 53
Attachments: Scan-to-Me from 10.19.12.5 2020-02-11 081648.pdf; IMG_0138.JPG

Attached is our submission on the proposed Plan Change that would see up to 23 properties added to the Rural Residential Activity Area. Also attached is a photo showing the driveway to 301 Normandale Road, which adjoins the locked gate at the entrance to Belmont Regional Park. The section of Normandale Road depicted in the application as adjoining 268 Stratton Street is beyond this locked gate.

We have grave concerns about the reliability of the traffic report submitted with the application. The report underplays the extent of the effects associated with the Plan Change, particularly the traffic effects, and we would like to see a more robust and realistic assessment of the traffic effects carried out. We would like to know what actions will be taken to mitigate the traffic effects in particular. Who will pay for the formation of the extension to Normandale Road? What effect will this road have on the many pedestrian and cyclist users of the park? How will the effects of high speed vehicles down Cottle Park Drive be addressed at the intersection of Cottle Park Drive and Stratton Street? Will Stratton Street to Poto Road be widened or made "no parking" on both sides to cope with the increased traffic?

We look forward to seeing how Council deals with these and related issues associated with this proposal.

Alan & Joyanne Stevens

RMA FORM 5

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	Last <u>Steven</u> First <u>Alan + Joyanne</u>	
Company/Organisation		
Contact if different		
Address	Number _____ Street _____ Suburb _____ City _____ Postcode _____	
Address for Service if different	Postal Address <u>joyannerteven@hotmail.com</u>	Courier Address
Phone	Home _____	Work _____
Email	Mobile _____ <u>joyannerteven@hotmail.com</u>	

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

Proposed District Plan Change No:

53

Title of Proposed District Plan Change:

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

- 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:

In principle we do not oppose the rezoning of this land from General Rural to Rural Residential, however we consider that the traffic report provided is deficient and misleading, as it fails to mention that the section of Normandale Rd beyond no. 301 is beyond the locked access gate to Belmont Regional Park (see attached photo).

(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:

Traffic effects associated with creating 23 potential lots on already substandard roads will create added pressure on the roads and intersections within several kilometres of the site, including vehicular, non-motorised, pedestrian and horse usage of these rural roads. This needs to be addressed as part of the plan change and not of mitigation measures attributed ahead of any resource consent process.

(Please use additional pages if you wish)

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

Please give precise details:

A full investigation of traffic effects, implementation of mitigation measures including improved sight lines, road widening, no parking lines, clearways, traffic control during development phase, for all sites identification of who pays for the upgrades necessary - developers / HCC / NZTA?

(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)

 10.2.20

Date

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.



Pine Bluff State Park
Pine Bluff State Park, Arkansas

From: Amelia Geary <A.Geary@forestandbird.org.nz>
Sent: Tuesday, 11 February 2020 12:51 PM
To: Corporate Records
Subject: Forest & Bird's submission on Proposed Private District Plan Change 53
Attachments: Forest_and_Bird_PC53_submission.pdf

Hi there

Please find Forest & Bird's submission on Proposed Private District Plan Change 53 attached.

Any questions, please email in the first instance.

Regards,
Amelia

Amelia Geary
REGIONAL MANAGER - LOWER NORTH ISLAND
Horizons, Wellington

Royal Forest and Bird Protection Society of New Zealand Inc.
Ground Floor . 205 Victoria St . PO Box 631 . Wellington . New Zealand
DD 022 039 9363

Please note, my days of work are generally Monday – Wednesday.

You can join Forest & Bird at www.forestandbird.org.nz



Forest & Bird
GIVING NATURE A VOICE

12th February 2020

**Clause 6 of the First Schedule
Resource Management Act 1991**

**Submission on the Hutt City
Proposed Private District Plan Change 53**

Emailed to: submissions@huttcity.govt.nz

From: Forest & Bird
PO Box 631
Wellington 6140
Attn: Amelia Geary
a.geary@forestandbird.org.nz

Royal Forest and Bird Protection
Society of New Zealand Inc.

Head Office:
PO Box 613
Wellington
New Zealand

P: +64 4 3857374

www.forestandbird.org.nz

INTRODUCTION

1. The Royal Forest and Bird Protection Society of New Zealand (Forest & Bird) is New Zealand's largest independent conservation organisation. It is independently funded by private subscription, donations and bequests. Forest & Bird's mission is to protect New Zealand's unique flora and fauna and its habitat. Forest & Bird is currently involved in processes before the Court to improve the Hutt City district plan provisions for the protection of significant natural areas and to implement Council's functions for the maintenance of indigenous biodiversity.
2. Zoning is a key land use management tool which can allow and restrict future activities under the purpose of the zone. Importantly indigenous biodiversity and natural landscapes are matters which apply across zones and should be provided for within overlay provisions as directed under the National Planning Standards. However the Hutt City District Plan does not yet implement that direction and as such the zoning approach and the changes sought by this plan change do not adequately provide for the protection of significant natural areas or implement councils functions to maintain indigenous biodiversity.
3. Forest & Bird's submission is on Hutt City Council's Proposed Private District Plan Change 53.
4. Forest & Bird could not gain an advantage in trade competition through this submission.
5. Forest & Bird wishes to be heard in relation to this submission and would consider presenting a joint case with others making a similar submission.

SUBMISSION

6. Forest and Bird opposes all parts of the plan change relating to the rezoning of 190, 236 and 268 Stratton Street, Normandale from General Rural Activity Area to Rural Residential Activity Area.

REASONS

7. Forest & Bird considers that the effects of the plan change on biodiversity, including streams and freshwater and the potential loss of natural habitats and effects on freshwater as a result of the plan change are inconsistent with the:
- a. Wellington Regional Policy Statement;
 - b. National Policy Statement for Freshwater Management;
 - c. Proposed National Policy Statement on Indigenous biodiversity; and
 - d. Section 6 of the RMA.
8. That the rezoning of land from General Rural Activity Area to Rural Residential Activity Area will afford lower protection to the biodiversity values of these areas due to the changes of use, particularly subdivision provided for under the activity zoning.
9. It is not appropriate to leave the consideration of the effects of activities which may be provided for under the new zoning to later consent processes when those effects can better be addressed at the time of the zoning plan change. The Council is unlikely to have full and adequate information before it when making a decision at the subdivision stage for the following reasons:
- a. The District Plan fails to provide adequate protection for s6(c) areas;
 - b. The Rural Residential Activity Area and subdivision rules do not provide scope for council to implement their functions for the maintenance of indigenous biological diversity under s31(1)(b)(iii);
 - c. The RMA limitations on notification effectively precludes public notification, other than in exceptional circumstances, for subdivision consent applications.
10. This means that the only opportunity for Council to have full and adequate information before it is at the time of considering a Plan Change or through a full plan review process.
11. The section 32 report provided by the applicant is inadequate and fails to consider the potential effects of the activity and councils responsibilities and functions under the RMA. The council must undertake its own s32 analysis.
12. That overall the plan change will not achieve the purpose of the RMA.

RELIEF SOUGHT

13. Forest & Bird seeks that the plan change application be declined.

Amelia Geary
Regional Manager
Forest & Bird

From: Karen <badjelly_the_witch@yahoo.co.uk>
Sent: Wednesday, 12 February 2020 12:08 PM
To: Corporate Records
Subject: Submission on Proposed Private District Plan Change 53
Attachments: KSelf submission plan change 53 final.pdf; KSelf additional pages Plan Change 53.pdf

Please find attached my submission on Proposed Private District Plan Change 53.
Let me know if you require any further information.
kind regards
Karen Self

RMA FORM 5

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	Self Karen	
	<small>Last</small>	<small>First</small>
Company/Organisation		
Contact if different		
Address	308 Normandale Road	
	<small>Number</small>	<small>Street</small>
	Belmont	
	<small>Suburb</small>	
	Lower Hutt	5010
	<small>City</small>	<small>Postcode</small>
Address for Service if different	<small>Postal Address</small>	<small>Courier Address</small>
Phone	021722809	
	<small>Home</small>	<small>Work</small>
	<small>Mobile</small>	
Email	badelly_the_witch@yahoo.co.uk	

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

Proposed District Plan Change No:

53

Title of Proposed District Plan Change:

Proposed Private District Plan Change 53

- 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:

I submit that if rezoning goes ahead a condition of any proposed subdivided lots past the current Old Coach Road entrance to Belmont Regional Park ("the Park") be accessed from Stratton Street.

I also submit that further in-depth traffic studies are required on the section of Normandale Road from number 237 to number 308 if lots are to be accessed from this section of road and beyond the entrance to the Park if my first submission is not accepted.

Consideration being given to creating a native bush corridor flanking the Old Coach Road entrance to the Park from the subdivided lots to link sections of the Park.

(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:

I submit that no vehicle access be given to proposed subdivided lots via Normandale Road past the current entrance at Old Coach Road to the Park. Any subdivision subsequent to rezoning should be accessed via Stratton Street as this has greater vehicle capacity.

Currently vehicles cannot access the Park past a locked gate at Old Coach Road entrance (see photographs in additional pages) adjacent to the driveway for 301 Normandale Road. From the gate there is a gravel single lane track flanked by farmland and some regenerating native bush (see map in additional pages). There is great amenity value for Park users and residents of Normandale in leaving this as a pedestrian, horse riding and biking track and allowing the bush to regenerate in this area. This a popular entrance to the park, especially for mountain bikers due to the many tracks available in the Park for them.

(Please use additional pages if you wish)

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

Please give precise details:

That any future subdivision as a result of the proposed plan change not be accessed past the current Old Coach Road gated entrance to Belmont Regional Park.

Any Council decision is fully informed by further in-depth traffic studies of Normandale Road from number 237 to 308 Normandale Road (and beyond the entrance to the Park if lots are to be accessed from this area).

That a regenerated native bush corridor is created from a strip of the subdivided lots along the current Old Coach Road to the join the two sections of Belmont Regional Park.

*(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)

Karen Self

11 February
2020

Date

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.

Proposed Private District Plan Change 53**Submission of Karen Self***Additional pages*

5. Whilst there were reasonably comprehensive traffic studies done on the affected areas of Stratton Street, scant information for the affected section of Normandale Road were included.

Normandale Road, from where it forks off at Sweetacres Drive, is even narrower in places than Stratton Street, with no road markings on the shoulders and the shoulders falling away in places on the lower side. There is already a reasonable amount of traffic for the size of road, especially at weekends with people accessing the Park, as well as dropping off and retrieving their pets from the dog kennels at 310 Normandale Road.

The Council needs to consider further the impact on infrastructure if the rezoning and subsequent proposed subdivisions take place. Specific consideration be given to roads, as I believe no upgrades or improvements are currently intended.



Intersection of Normandale Road and Sweetacres Drive – only section with any central road markings.



Two representative sections of Normandale Road between numbers 237 and 308



Old Coach Road entrance to Belmont Regional Park adjacent to driveway to 301 Normandale Road (left) and representative section of track bordering 236 and 268 Stratton Street.



Section of Normandale Road from Sweetacres Drive intersection to entrance to Belmont Regional Park at Old Coach Road

From: Matthew Willard <matthew.s.willard@gmail.com>
Sent: Wednesday, 12 February 2020 7:07 PM
To: Corporate Records
Subject: Submission relating to Proposed Private District Plan Change 53: 190, 236 and 268 Stratton Street, Normandale – Rezoning to Rural Residential Activity Area
Attachments: RMA FORM 5 - PC 53.pdf

Hi,

Please see attached submission relating to Submission relating to Proposed Private District Plan Change 53: 190, 236 and 268 Stratton Street, Normandale – Rezoning to Rural Residential Activity Area

Kind regards,
Matthew

RMA FORM 5

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 if different		
Address	<i>Number</i> <i>Street</i>	
	<i>Suburb</i>	
	<i>City</i>	<i>Postcode</i>
Address for Service if different	<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.

“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 crash history shows that there are no inherent safety deficiencies with Stratton Street based on crash history.”

We agree that Stratton Street has a number of different road users, however we disagree that **all users of the road are aware of the traffic environment**. It would be more appropriate to state that **“all residents and some road users...”** This claim is anecdotal and is not supported by suitable evidence.

The evidence that is used to justify this statement is the lack of low reported crash statistics and that the likelihood of future crashes should be considered a *black swan* event.

This would be akin to Pike River mine stating that an explosion has not occurred yet, demonstrating that the operations should be considered “safe” despite numerous warnings of a potential catastrophe.

The assessment should consider the numerous near misses (leading indicators) that have occurred along Stratton Street, which would provide a better understanding of the underlying risk. In my personal experience, as a cyclist having lived on Stratton Street for 14 months, I have had more near misses than when we lived in Wellington city over 10 years. This applies to both cycling and vehicular road usage.

The report does not adequately consider use other than vehicles.

My wife and two toddlers used to almost daily walk from our Stratton Street property down to the bike park, (wearing hi vis clothing) however just this week she was shunted off the road by a vehicle and quite luckily managed to push the pram with our sleeping baby and remaining toddler away down a sloping bank before herself turning away. This is a common occurrence. We understand that there are many elderly walkers and individuals with children, that have also had near misses and are disappointingly beginning to avoid the area due to the traffic environment and road users. The lack of a dedicated footpath contributes to this risk.

Individuals walk or cycle up Stratton Street the intersection of Cottle Park Drive to catch public transport, school buses or attend the local Normandale Primary School.

The current road is used for horse riders and there are many residences with horses or grazing horses along Stratton Street. Approximately 2 km from the Cottle Park / Stratton Street intersection there is a community horse riding arena which creates additional traffic and vehicles towing horse floats. It is not uncommon to see cars and floats parked along the verge of the road.

The lower recreational areas of Stratton Street and immediately opposite one of the proposed subdivision sites, has weekly TimberNook outdoor education and exploration sessions for pre-schoolers. These pre-schoolers and their caregivers use both the woolshed and surrounding regional park. Furthermore, the two local Playcentres frequently use this lower area and bike park area, immediately opposite one of the proposed subdivision sites. There is serious concern amongst these groups as to current safety risks and the significant safety risks proposed by the subdivision.

The road is not suitable for walkers, cyclists, horse riders, and now the additionally proposed residential vehicles to be accessing Stratton Street.

I recognise that this is a rural road, however with the regional park, the recent development of the bike area and further development of private dwellings, similar to that proposed in this District Plan Change 53 increases the health and safety risks and we urge Council to consider these matters to

ensure that the risks are reduced so far as is reasonably practicable and that Council adopts a philosophy of avoidance of all avoidable risks.

*“...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.***

...

*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.***

The author claims a 100% increase in vehicle movements during the week as a result of the proposed change and as stated previously has based the assessment on historical road usage recognising that there are “**geometric deficiencies**” in the road design.

Taking this into account and my own experiences and near misses, there should be greater emphasis on the safety impacts of the increased traffic movements considering that the road is very narrow in many areas, has a number of blind corners and multiple categories of road users including horses. There is no dedicated footpath area for pedestrians with current residential lots immediately bordering the Stratton Street road.

The road widening and swept corners are not engineered and are simply flat areas of the road that historical usage has carved out. There is frequent flooding in heavy rainfall events with the residents clearing areas.

The proposed subdivision lots are at the lower Stratton Street meaning that all additional movements would be required to drive the length of the Stratton Street road.

It is inappropriate for the proposed 17 lots to be accessed off Stratton Street in its current form. Originally we understood that the proposed lots were all to be accessed from Cottle Park Drive, which provides for significantly **safer** access via Normandale Road. Whilst the proposed subdivision costs may increase, there should be a greater emphasis on safety of the current road users and local residents.

Finally, whilst we do not oppose the plan amendment in principal, Council should review the need to improve safety on Stratton Street considering the need to avoid all avoidable risks.

From: Pete <pmatcham@actrix.co.nz>
Sent: Wednesday, 12 February 2020 10:01 PM
To: Corporate Records
Subject: submission on ppc 53
Attachments: P&S Submission on Private plan change 53 sandie comments.docx

Please find our submission attached.

Submission on Private plan change 53 – Stratton Street Normandale Report No HCC2019/1(2)/229

made on behalf of

Peter and Sandra Matcham

We have an interest in this plan change as an adjoining neighbour.

Our concerns are based around the wider environmental effects that would follow the plan change.

As noted in the application, we originally agreed to be party to the application, but withdrew when it became clear that the consultant preparing the report was proposing changes that would effectively destroy the very things that we value, and for which we bought our property.

Unlike the consultant we have evaluated the non-monetary values that would be lost and consider them to outweigh any financial gain we might have made from the zoning change to our property.

We are aware that our neighbours would not contemplate the level of development that the application envisages, but are acutely aware that once the change is approved it enables future owners more concerned with financial gain to destroy the local environment.

As a result of extensive research for both academic and practical purposes, we are well aware of the failure of the RMA to protect the natural environment, and that the principle cause of this failure is the practice of considering application for resource consent in isolation defined by property law rather than at a level meaningful to the environment. Similarly the failure to effectively manage cumulative effects, leading in effect to a death by a thousand cuts.

We are also concerned to note that the application includes proposed plans that include our property, and makes erroneous statements regarding the Old Coach Road, a grade 2 listed historical site which forms part of the boundary of our property

Proposed remedy - amend.

We do not wish to prevent our neighbours from developing their properties, but we wish to see this done in a way that provides robust and transparent measures to protect the natural, social and recreational environment of the area. We therefore submit that the application should be amended where there are errors (detailed below) to correctly reflect the actual situation, and the planned sub-divisions be re-drawn in a way that takes account of the actual topography.

This approach would we believe remove uncertainty and require a level of detail that would enable full environmental effects to be evaluated and any necessary constraints to avoid or mitigate them defined..

We do not wish to trigger a formal hearing, but if one is held we wish to be heard.

Detailed comments

We note that the primary purpose of the RMA is ‘... to promote the sustainable management of natural and physical resources.’. We fail to see how the application does this, despite the claim in Section 3 Background that it does so. The claim is not we feel supported by any of the subsequent arguments.

Section 32 Evaluation.

We note that the S32 report claims in para 22 that there appear to be “two small streams both intermittent or ephemeral.” Since there is one permanent stream that passes through our property and that of one of our neighbours that is included in this application, and there are easily accessed historical maps which show others across these properties, we cannot help but query the level of accuracy of this whole section.

Para 28 is also misleading. Both our property and that subject of the PPC are bounded to the South by recreation reserve, not Cottle Park, whilst the only property adjoining to the East is our own, which cuts off all properties subject to the application from Normandale Road. The remainder of the East boundary of the PPC properties about the Grade 2 historical site of the Old Coach Road (Belmont – Pauatahanui) which is a major non-vehicular access to Belmont Regional Park used by walkers, horse riders and cyclists. It is maintained as such by GW under management agreement with HCC. (Fig 1)



Fig 1 – Entrance to Old Coach Road at end of Normandale Road

Scale and Significance assessment.

We consider that Section 3.3.2 confuses absolute numbers with impact. We would argue that both scale and significance must be considered not by absolute values but in comparison with existing

state. Hence a proposal that permits a 150% increase in housing over the entire valley and an 800% increase on the properties concerned cannot be considered minor.

Such a change will have a major impact on all aspects of the environment, natural and social. It would irrevocably change the character and amenity values of the land in question. The report is incorrect in its assertion that the land subject to the PPC is “not visually prominent when viewed from the wider environment”. The only place where this would be true is beyond the ridgeline to the East. From everywhere else in the surrounding area the site is prominent.

We are also bemused by the assertion in Section 3.4 Evidence base, that a concept plan that ‘... does not consider the topography of the site or potential restrains(sic) on development’ can be considered ‘evidence’. We also note that this concept plan includes and subdivides our own property despite that not being included in the PPC.

3.5 Quantification

An S32 evaluation is required to Identify and assess benefits and costs of environmental, economic, social and cultural effects. We submit that the application fails to identify and cost the environmental and social effects and so far as economic effects are concerned relies solely on easily identified financial costs and benefits despite S2 of the RMA requiring both monetary and non-monetary costs and benefits to be considered. Since the costs to the public good are likely to be the major negative, we consider that these must be evaluated and considered even if ‘exact quantification’ is impractical.

Section 4.1 Consiltation.

We support and concur with the concerns expressed by GW. The lack of detail provided in the application and the assumption that these will be addressed later effectively prevents cumulative effects being considered, and constraints to avoid or mitigate them being applied. We would also point out that best practice requires environmental effects to be considered on a scale appropriate to the effect, and not constrained by artificial boundaries based on property title.

Section 5.1.2

As one of the SNRs defined by HCC crosses between our property and those the subject of the PPC, we are concerned at the apparent dismissal in the application of the relevance of this. We consider the identification of SNRs and their protection as essential to the maintenance and protection of natural biodiversity and of the character of the area that we live in.

Section 7.

We are disappointed that the consultants seem to dismiss the relevance of Kaitiakitanga / ethic of stewardship as we and most, if not all of our neighbours have a high degree of respect for the environment and our responsibilities as Kaitiaki. We have noted the potential for the plan change to have a high and widespread impact on amenity values and the report acknowledges the existence of high quality native ecosystems especially within gullies. We consider that protection and stewardship is of vital importance in considering section 7 compliance.

Section 5.3 –NPS –FM catchment level management of land use.

We suggest that para 109 fails to take into consideration the fundamental requirements of the NPS-FM particularly with regard to te Mana o te Wai, not just with regard to the streams in the affected area, but in considering the potential impact of the development the plan change would permit on the wider catchment of the Korokoro stream.

Section 6.1 Evaluation of options

Our concern here is that despite the requirement to consider all costs and benefits, only direct monetary costs are mentioned. No attempt is made to evaluate true economic costs by the inclusion of non-monetary costs and benefits.

We have previously noted that the assertion that only a 'minor' change in the local environment would eventuate fails to consider the scale of change with relation to the existing state. The evaluations also seek to align hypothetical futures with current costs as an argument in support. Equally hypothetical futures could be posited that would equate to benefits rather than costs.

7.1 Amenity and Character Effects

We have previously noted that the assertion that the increase in building density would only be visible from the immediate surrounding properties is the reverse of the truth. Due to the topography, immediately surrounding properties are those less likely to be impacted by visual changes than the wider area.

7.4 Landscape Natural Character and Ecology effects.

Once again the justification for ignoring these concerns is that they will be addressed piecemeal if and when applications for resource and building consents are made. An abrogation of the requirement to consider wider and cumulative effects which has led to an abysmal track record of destruction of natural resources and negates the primary purpose of the Act.

Transport impact assessment

The report contains several factual errors – No property subject to the PPC abuts Normandale Road. We note that although the report acknowledges Stratton Street as a major access point to BRP, it fails to note that Normandale Road is also a major access point for cyclists, horse riders and dog walkers. (see fig 1 above)

The statement that 268 Stratton St has road frontage to Normandale Road is incorrect. Normandale Rd stops at the entrance to 301. The continuation, the unmade bed of the Belmont to Pauatahanui coach road, a grade 2 listed historic site, has never been part of Normandale Road and is not maintained by HCC. Similarly, the report refers to six new lots having direct access on to Normandale road, as noted above this is incorrect.

We are confused as to how peak traffic flows have been derived. If the assumption that the traffic generated from existing houses is around 90 per day it seems counter to suggest peak 'hour' movements would be 10 per hour, since most residents work off site we would have expected peak

flows to be around 25 – 30 per hour morning and evening. This is relevant as the consultant presumably uses the same basis to estimate future flows that could be generated by the PPC.

We have the same problem here as with the Scale and Significance section above: confusion of absolute numbers with the scale of effect. As before, in terms of absolute numbers the proposed change does not generate high number of traffic movements. However in the context of the local environment, it has the potential to increase traffic movements by around 150%. It is also misleading to say that the new traffic movements will be split across Stratton Street and Normandale road. Lower Normandale road will become a receiver of some new movements but all will need to exit on Stratton Street.

Conclusion

We do not wish to prevent our neighbours from developing their land, but submit that a change of zoning to Rural Residential without fully evaluating the environmental effects and providing constraints to avoid or mitigate these where appropriate is not meeting the requirements of the RMA or the expectations of the public.

We suggest that HCC should require the application to be revised to correctly reflect the actual situation, and the planned sub-divisions be re-drawn in a way that better reflects the actual topography and provides a realistic evaluation of effects on the environment and locale.

From: Pete <pmatcham@actrix.co.nz>
Sent: Wednesday, 12 February 2020 10:27 PM
To: Corporate Records
Subject: submission on ppc 53
Attachments: Submission on Private plan change 53.docx

Please find attached a submission on behalf of the Friends of Belmont Regional Park.

Submission on Private plan change 53 – Stratton Street Normandale Report No HCC2019/1(2)/229

made on behalf of the

Friends of Belmont Regional Park

The Friends of Belmont Regional Park (the Friends) are an advocacy group concerned with the preservation and enjoyment of Belmont Regional Park. The Friends are recognised by Greater Wellington Regional Council as the overarching 'voice' of Park users. As such we have an interest greater than that of the general public in so far as the proposed plan change affects the environment and users of the Park.

Our concerns are based around two areas. First the wider environmental effects that would follow the plan change. In line with the arguments by the applicant's consultant, we consider the plan change as an enabling change. Regardless of the intentions and values of the current property owners, such a change would mean that they and future owners could not be prevented from undertaking development in the peri-urban environment that would be considered on a piecemeal basis rather than as a totality – death by a thousand cuts. Such development will radically alter the visual and amenity values of the park's environs both directly and by increasing the creep of suburbanisation into the rural areas, with the attendant perils of reverse sensitivity from changing expectations.

Secondly the practical impact of the proposed change on users of the Park, and the erroneous assumptions made in the application regarding Park access along the Old Coach Road.

Proposed remedy – the application be amended.

We submit that to achieve the desired outcome of increased ability to subdivide together with robust measures to protect the natural, social and recreational environment of the area, the application should not be accepted in its present form and should be amended to include a robust analysis of environmental effects, sufficient to allow any measures necessary to avoid or mitigate these to be defined.

We submit that the benefits of this approach are precisely those the applicant cites against it. It removes uncertainty and requires detailed information that enables the full environmental effects to be evaluated in accordance with the RMA. We consider that a failure to provide detailed and robust data on environmental effects is contrary to the purpose of the RMA.

If a public hearing is required, we would wish to be heard

Detailed comments

In section 3 Background of the application, it is stated that the proposed plan change will better meet the purpose of the RMA. We submit that this statement is not supported by the following text which ignores the first and primary purpose '... to promote the sustainable management of natural and physical resources.'

Section 32 Evaluation.

We are concerned that the S32 report displays a lack of evidence and makes incorrect and misleading statements concerning the site. For example Para 22 states that there appear to be “two small streams both intermittent or ephemeral.” There is at least two permanent stream easily identified and even a cursory examination of historic maps identifies others that may now indeed be intermittent but which are central to the ecology in the gullies.

The description of the surrounding area in Para 28 is confused and inaccurate. Property to the South of the area is not known as Cottle Park and is in fact recreation reserve. Cottle Park and other Stratton St properties lie beyond the reserve. The only abutting property to the East is zoned Rural and lies on Normandale Road. The remainder of the Eastern boundary of the PPC properties abut the Grade 2 historical site of the Old Coach Road (Belmont – Pauatahanui) which is a major non vehicular access to Belmont Regional Park used by walkers, horse riders and cyclists. It is maintained as such by GW under management agreement with HCC. (Fig 1)

Scale and Significance assessment.

Section 3.3.2 Factor 1 presents arguments based on invalid assumptions. In summary, the impact of the PPC cannot be considered as low when it increases the potential housing density of the wider area by over 150%. This will have a major impact on all aspects of the environment, natural and social. We consider the impact for this factor should be high – 4

Factor 3 degree of shift from current state. Again we cannot see how the proposed change can be considered low when if implemented in full it would irrevocably change the character and amenity values of the land in question. In particular the idea that the potential subdivision ignores the major earth works that would be required Including well over 1km of new internal roading, and the fact that this face of the Korokoro valley has high visibility from the most used parts of BRP. The claim that the three properties subject to the PPC ‘are not visually prominent when viewed from the wider environment’ is incorrect. Presumably the consultant preparing the report has never visited BRP, let alone looked up the Korokoro valley from properties in Dowse Drive and Miromiro Rd/ Poto Rd saddle The Factor score should be 5.

Although the suggested changes to the factor score only gives an overall scale of Moderate, we are concerned that the lack of care exhibited in these factors calls into question the whole evaluation.

Section 3.4 Evidence base. We struggle to understand how a concept plan that ‘... does not consider the topography of the site or potential restrains(sic) on development’ can be considered ‘evidence’ worthy of the name, particularly as it also apparently includes land not subject to the PPC

3.5 Quantification

An S32 evaluation is required to Identify and assess benefits and costs of environmental, economic, social and cultural effects. We submit that the application fails to identify and cost the environmental and social effects and so far as economic effects are concerned relies solely on easily identified financial costs and benefits despite S2 of the RMA requiring both monetary and non-monetary costs and benefits to be considered. Since the costs to the public good are likely to high

we consider that these must be evaluated and considered even if 'exact quantification' is impractical.

Section 4.1 Consiltation.

We support and concur with the concerns expressed by GW. The lack of detail provided in the application and the assumption that these will be addressed later effectively prevents cumulative effects being considered and constraints to avoid or mitigate them being applied. We submit that current best practice requires environmental effects of land use, the protection of natural vegetation and fresh water management must be considered at the widest possible level consistent with the effect, not on an individual property basis.

Section 5.1.2

We consider the dismissal of any requirement to consider section 6 (c) on the basis of a HCC decision (currently under appeal) ignores the broad intent of the Act in favour of narrow legalistic interpretation.

Section 7.

We consider that the failure of the section 7 analysis to consider Kaitiakitanga / ethic of stewardship as relevant shows a failure to understand the public concern with this in regard to the natural environment and especially water courses. We have noted the high and widespread impact on amenity values and the report acknowledges the existence of high quality native ecosystems especially within gullies. We again believe that consideration of the area as an integral part of the catchment must be considered in detail if compliance with S7(c) is to be demonstrated.

Section 5.3 –NPS –FM catchment level management of land use.

Para 109 again fails to understand the importance of catchment level management of fresh water by seeking to refer these considerations to individual applications for resource consent. We submit that we as a country cannot continue to fragment consideration of catchment level effects if public and legislative concerns over fresh water management and the protection of native biodiversity are to be realised.

Section 6.1 Evaluation of options

All tables consider only direct monetary costs. No attempt is made to evaluate true economic costs by the inclusion of non-monetary costs and benefits.

Option A Do Nothing posits a hypothetical future cost to achieve the same outcome as currently sought. It then suggests this option is inefficient on this basis. It uses a similar circular argument to define effectiveness in terms of the requested change. The overall assessment suggests the sites would be under utilised. This appears rest on assumptions that are neither identified nor quantified, but seem to be based on the view that financial return is the only relevant criterion, contrary to the purpose of the RMA.

Option B Of the Benefits listed, 8.3 is no change from existing so hardly a benefit, 8.4 As could be considered a benefit or cost we suggest it should be removed. 8.5 is a nonsensical argument. The provisions of the district plan apply whatever the zoning.

Costs.

8.8 asserts that there would be a 'minor' change in the local environment. As noted above we submit that a 150% increase in housing within the valley cannot be considered minor. Any such level of change must be considered as major, with associated costs to the natural and social environment.

8.9 By limiting its view to consideration of 'productive' soil, this paragraph again fails to consider any value other than monetary. We submit that at the very least, the loss of amenity value is major and should be considered.

7.1 Amenity and Character Effects

Para 145 As noted above, the contention that the increase in building density would only be visible from the immediate surrounding properties is the reverse of the truth. Due to the topography, immediately surrounding properties are those less likely to be impacted by visual changes than the wider area.

The argument that the density of dwellings in the surrounding area is consistent with that allowed under the PPC relies on the zoning criteria not the actuality and should not be accepted as a valid comparator.

7.4 Landscape Natural Character and Ecology effects.

Once again the justification for ignoring these concerns is that they will be addressed piecemeal if and when applications for resource and building consents are made. An argument that leads to an abrogation of the requirement to consider wider and cumulative effects which has led to an abysmal track record of destruction of natural resources and negates the primary purpose of the Act.

Transport impact assessment

The report contains several factual errors – No property subject to the PPC abuts Normandale Road. We note that although the report acknowledges Stratton Street as a major access point to BRP, it fails to note that Normandale Road is also a major access point for cyclists and dog walkers, runners etc.

The statement that 268 Stratton St has road frontage to Normandale Road is incorrect. Normandale Rd stops at the entrance to 301. The continuation, the unmade bed of the Belmont to Pauatahanui coach road, a grade 2 listed historic site, has never been part of Normandale Road and is not maintained by HCC. Similarly, the report refers to six new lots having direct access on to Normandale road, as noted above this is incorrect.

Objective 14A 3.5 The wording here is misleading. In terms of absolute numbers the proposed change does not generate high number of traffic movements. However in the context of the local environment, it has the potential to increase traffic movements by around 150% based on the same assumptions made by the author of the report. It is also misleading to say that the new traffic

movements will be split across Stratton Street and Normandale road. Lower Normandale road will become a receiver of some new movements but all will need to exit on Stratton Street.

Policy 14A 4.4 Again we fail to understand how a 150% increase in traffic movements can be considered a 'small increase'. This should be clearly stated as a major increase.

Conclusion

We do not wish to prevent the owners of the land the subject of the PPC from developing their land, but submit that the lack of consideration of environmental effects and of analysis in the application are such that it should not be accepted in its current form.

From: Pam Guest <pam.guestnz@gmail.com>
Sent: Thursday, 13 February 2020 12:09 AM
To: Corporate Records
Subject: Plan Change 53
Attachments: PlanChange53.pdf; PC53.docx

Please find attached our submission on Plan Change 53, including base form plus an attachment with further details.

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Pam Guest
Environmental Planning
177 Stratton St
Western Hills
LOWER HUTT 5010

h/w 04 586-6467
m 0276 774466

RMA FORM 5

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	Shaw & Guest Peter; Pam	
Company/Organisation		
Contact if different		
Address	177 Stratton St	
	Normandale	
	Lower Hutt	5010
Address for Service if different	Postal Address	Courier Address
Phone	Home	Work
	0274906733	
Email	guest.shaw@gmail.com	

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

Proposed District Plan Change No:

53

Title of Proposed District Plan Change:

190, 236, 268 Rezoning to Rural Residential Activity Area

- 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:

Traffic management
Protection of significant indigenous biodiversity
Protection of streams and their riparian margins

(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:

Refer to attached

(Please use additional pages if you wish)

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

Please give precise details:

For the plan change to include conditions that:
- protect health and safety on the local road
- protect significant indigenous biodiversity
- protect streams and their riparian margins

(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.

- **Traffic management.**

We do not agree with the conclusions of the Transportation Impact Report regarding the potential effects of the plan change on road safety, given the introduction of potentially 23 new dwellings in an area currently containing 6 dwellings.

The Report poorly characterizes the Northern end of Stratton street. It is narrow, of uneven width and camber, and steep and winding in parts, with non-existent pedestrian provisions. In particular, it carries an atypically large load of recreational traffic - pedestrian, bicycle, and horse born - all of whom risk collisions with vehicular traffic. The limited accident data from the last five years is at odds with the daily experience of near misses.

While sensible drivers will limit speeds to 25-30Km/h, the signage and speed limit allows an unsafe 50km/h, and some drivers exceed this further.

Increasing the valley's population to such an extent will inevitably lead to higher conflict and risk on the road. We request that should the plan change proceed, the council recognize these risks and respond with an appropriate traffic management plan. Most likely this would include lower signed speed limits and traffic calming measures. We would not support road re-alignment as this would most likely lead to increased speeds and risk.

- **Significant indigenous vegetation**

We disagree with the assessment under Section 5.1.2 that the proposal is consistent with Section 6(c) of the RMA, given that significant natural areas have already been identified within the plan change area.

As recognised in the draft National Policy Statement for Indigenous Biodiversity, New Zealand's indigenous biodiversity is in decline, with much of the remaining indigenous biodiversity on privately owned land. District councils have an important role to play in seeking actions from private landowners to ensure indigenous biodiversity is maintained, noting their function under RMA Section 31(b)(iii) to:

“control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—

(iii) the maintenance of indigenous biological diversity:

We consider that provision should be made as part of the plan change to require the protection of those areas already identified as having, or potentially having, significant indigenous vegetation and significant habitats of indigenous fauna as a pre-requisite for more intensive development, irrespective of whether the district plan has mandatory restrictions on private landowners. This is consistent not only with RMA s6(c), but also with Policies 23 and 24 of the Regional Policy Statement for the Wellington Region.

- **Water Quality and aquatic ecosystem health**

We note RPS policies –

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

Also relevant objectives and policies in the Proposed Natural Resources Regional Plan have not been recognised, in particular:

Objective O25 Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded ...

Objective O27

Vegetated riparian margins are established, maintained, or restored to enhance water quality, aquatic ecosystem health, mahinga kai and indigenous biodiversity of rivers, lakes, natural wetlands and the coastal marine area.

There are at least two permanently flowing streams within the plan change area (not ephemeral nor intermittent as assessed in the application). We consider, contrary to the assessment (para 108), that provision should be made to protect these waterways and their riparian margins, at the plan change stage, rather than leaving this to be assessed on a case by case basis as part of individual subdivision consent applications. This risks inevitable cumulative effects, rather than taking a more strategic approach which is to assess the values of and risks to these streams from the entire plan change proposal.

We note that the request by the regional council to prepare a structure plan was rejected but consider that this would have provided a more strategic approach to protecting environmental values, including aquatic ecosystem health and indigenous biodiversity.

Addresses for Service

Submission Number	Submitter Name/Organisation	Email Address
DPC53/1	Alan and Joyanne Stevens	joyannestevens@hotmail.com
DPC53/2	Royal Forest and Bird Protection Society of New Zealand	a.geary@forestandbird.org.nz
DPC53/3	Karen Self	badielly_the_witch@yahoo.co.uk
DPC53/4	Matthew Willard	matthew.s.willard@gmail.com
DPC53/5	Peter and Sandra Matcham	pmatcham@actrix.co.nz
DPC53/6	Friends of Belmont Regional Park	pmatcham@actrix.co.nz
DPC53/7	Pam Guest and Peter Shaw	guest.shaw@gmail.com