

**SUPPORTING EVIDENCE FOR IN-PERSON SUBMISSION IN THE MATTER OF PLAN
CHANGE 56 (HUTT CITY COUNCIL)**

**IAN McLAUCHLAN
28 APRIL 2023**

INTRODUCTORY REMARKS

1. PC56 is too blunt and broad-brushed in its approach to fulfilling the aims of the NPS on Urban Development. Its simplification of District Plan Activity Areas creates a one-size-fits-all approach and will result in a loss of diversity of housing types, plot sizes, green spaces, amenity values and capacity to deal with climate change. Just go to Ariki Street in Boulcott where there were formally 3 house sites and now 16 housing motel type units under construction as a result of PC43.
2. Previous HCC plan changes (12 [2011], UGS [2014] and 43 [2019]) that have allowed for urban growth and intensification can already satisfy the requirements of the NPS-UD without the need to further intensify the existing built environment.
3. Existing District Plan Zones such as the Special Residential Activity Areas are some of the few existing urban spaces that can fulfil requirements to cope with climate change (stormwater retention, temperature regulation, CO₂ absorption) and are under threat from this Plan Change which does nothing to encourage diversity in urban form. With PC43 already operative, Lower Hutt is with PC43 already changing from a Garden City to a Soulless City devoid of meaningful private residential green spaces, quality of design, and quality of architecture that aspires to be more than just the bland and bare permitted minimum.

INTRODUCTORY REMARKS (continued)

4. The city's existing infrastructure is in poor condition and is unable to currently cope with climate extreme events which will only be exacerbated by the intensification proposed by PC56 let alone the current city wide intensification already mandated under PC43 (Dominion Post Article: 13 March 2023 see attached copy).
5. PC56 proposes the redefinition of amenity values (amendment 9, objective 1) from the definition of the RMA of
“Those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence and cultural recreation attributes.” to
“The amenity values within the urban environment develop and change over time to support a well functioning urban environment and meet the diverse and changing needs of people, communities and future generations.”

The proposed change in wording makes the new definition meaningless, provides regulators with too broad a scope as to what is or isn't acceptable, and does nothing to protect or enhance the future environment of Hutt City.

Hutt City's finances have worsened over time, with a backlog of infrastructure projects it can't fund and an increasingly worrying level of debt.

ROBERT HITCHCOCK
STAFF

How a city ended up in

Jo Miller does not hold back when it comes to her support for Three Waters reform.

Speaking before National announced its plans for Three Waters, the chief executive of Hutt City Council said that without reform, it would be impossible to deal with the backlog of work required to fix the city's broken water infrastructure.

The council does not have the money to do the work or the ability to borrow the huge sums required, she said.

Some time in the not too distant future, Hutt City will also need to build a pipe to take sewage from the Seaview Treatment Plant to the outfall pipe at Pencarrow. The existing pipe is under the only road into Leithrocks. Digging it up and closing the road for years to put in a bigger one is not an option. A new pipe would have to be put on the harbour floor and is likely to come at an eye-watering cost.

The existing pipe has a history of leaking and was replaced twice in 2022.

When it rains, the city's creaky pipes cannot cope as stormwater enters the sewerage system. These leaks ago, in not particularly heavy rain.

Wellington Water said what it is forced to do on a semi-regular basis: it pumped treated effluent into Whitford Stream.

It is offensive to local Maori, and council strategic adviser Bruce Hodgins said it was not in line with Government policy on freshwater management.

The Ahi Aoia elder Te Pira Puketapu said it had been happening for too long and the council needed to address the issue.

It is offensive to everybody and not just Maori. He sees people fishing in the stream and taking watercress, and suspects they do not realise the stream is regularly used for overflow from the treatment plant in Seaview.

The pipe is not the only financial headache Hodgins has

with stormwater. Much of the system dates back to the 1950s and 1960s, and can only cope with a one-in-10-year storm. It is falling across the city and the council plans to upgrade it to cope with a one-in-100-year flood.

City-wide, ageing infrastructure is falling at the same time, as the number of houses being built continues to rise. A 2021 report by Wellington Water spelt out the situation, putting its estimated price tag of \$1.27 billion on work needed.



Hutt City Council CEO Jo Miller says without Three Waters reform, the city couldn't deal with the backlog of work needed to fix broken water infrastructure.

That figure does not include a new outfall pipe from the treatment plant, estimated cost \$70m, and the council is also likely to face an ever-increasing bill to keep the existing underground pipes from falling.

Hodgins concedes that like other infrastructure projects, the estimated cost of \$70m is almost certain to be significantly more and rising all the time.

The city council also has 223km of pipes rated in poor condition and Miller is blunt in her assessment of the council's ability to pay the bill. If the



Built in the 1990s by the Hutt City Council, the plaza's financial mess resulted in local politicians hearing debt for decades to come.

Government's Three Waters proposal does not go ahead, Hutt City does not have the financial ability to fund the work required. This council's latest rates rise of 6.9% would hit many ratepayers hard and Miller said the council cannot keep raising rates to pay for infrastructure that should have been fixed decades ago.

As of December 31, council debt was \$247.6m and for 2023-24 it is forecast to be \$400m. By 2027-28 it could reach \$688m.

For a council that collects \$338m in rates, that is a lot of debt.

Using debt to fund the backlog of work is not feasible, Miller said. No one will lend the council the money required just even if they did, it is beyond the council's ability to repay it.

So how did a council that for many years prided itself on low rates increase and low debt get into such a quagmire?

To answer that question, you

have to go back to the 1980s. A new chief executive, Rodney Kerr-Newell, dealt with debt by asset sales and, according to his experience by closing libraries and swimming pools.

Subsequent councils set tough debt caps and for some years Hutt City boasted that its rate rises were among the lowest in New Zealand.

In 2011 for instance, the council came in under its debt target of \$60m by \$15,000, as it increased rates by 5.6%.

Council chief executive Tony Stallinger was pleased with the result and said research predicting Hutt City rates would fall 10%, against the average over the next 10 years, was good news.

Mayor David Dugan said he favoured keeping a tight rein on finances. "It is easy to spend money but it is very hard to get it."

A few years of austerity, the situation began to change in 2015, with Mayor Ray Wallace signalling it was time to spend some money and use debt, then at an astonishingly low \$35m, to fund growth.

"It's time now to look to the future and make this city proud."

There is nothing very sexy about pipes, and with the rate rise of 2.79% the council funded a range of projects, including sporting hubs, extending a swimming pool and refurbishing the council's main administration building.

In recent years, the council has spent money on sports facilities, an events centre, getting a hotel off the ground and working \$26m of loss for developers.

Recently, councillors debated funding a range of major resilience/infrastructure projects, some of which, like the \$80m Eastern Bays pathway, had been talked about for decades.

became a rat-garden for decades.

became a rat-garden for decades. Rodney Kerr-Newell, dealt with debt by asset sales and, according to his experience by closing libraries and swimming pools.

Subsequent councils set tough debt caps and for some years Hutt City boasted that its rate rises were among the lowest in New Zealand.

In 2011 for instance, the council came in under its debt target of \$60m by \$15,000, as it increased rates by 5.6%.

Council chief executive Tony Stallinger was pleased with the result and said research predicting Hutt City rates would fall 10%, against the average over the next 10 years, was good news.

Mayor David Dugan said he favoured keeping a tight rein on finances. "It is easy to spend money but it is very hard to get it."

A few years of austerity, the situation began to change in 2015, with Mayor Ray Wallace signalling it was time to spend some money and use debt, then at an astonishingly low \$35m, to fund growth.

"It's time now to look to the future and make this city proud."

There is nothing very sexy about pipes, and with the rate rise of 2.79% the council funded a range of projects, including sporting hubs, extending a swimming pool and refurbishing the council's main administration building.

In recent years, the council has spent money on sports facilities, an events centre, getting a hotel off the ground and working \$26m of loss for developers.

Recently, councillors debated funding a range of major resilience/infrastructure projects, some of which, like the \$80m Eastern Bays pathway, had been talked about for decades.

The Parliamentary Commissioner for the Environment, Declining Green Spaces Report, released on 21 March 2023, and the concerns raised in it seem sage and timely when considering outcomes intended and proposed under HCC's PC 56.

The report provides many warnings with respect to enabling poor urban design and planning outcomes – many of which have been sadly exemplified by the recent climatic events such as Cyclones Hale and Gabrielle, and the Auckland Anniversary Weekend floods of 27 January 2023.

Aotearoa's cities are losing their leaves

Green spaces in New Zealand's cities are declining. That has consequences for the environmental services they provide.

PCE Administrator

21 March 2023



Some key points from the PCE report are summarised below

But not all intensification is the same. The style of infill townhouse development that is currently playing out within our cities comes with particular risks for the existing network of urban green space and the environmental services it provides. These changes are not easy to undo.

Why is green space important?

The benefits of urban green space can be grouped into three broad categories:

- visual amenity and placemaking
- recreation, health and wellbeing benefits
- environmental services.

While visual amenity and wellbeing benefits are important, the report focuses on the benefits provided by environmental services. These include temperature regulation, carbon sequestration, flood mitigation, erosion control, food provision, air and water filtration and habitat for biodiversity.



The benefits of urban green space can be grouped into three broad categories. The Commissioner's report focuses on the benefits provided by environmental services.

Some examples of poor outcomes in Hutt City are exemplified below.

The examples to be shown in this presentation are typical of many such instances across HCC – many of which have been implemented as a result of previous plan changes that encouraged intensification and which have had medium density design guidelines that have been ignored or not properly implemented. Many have been initiated well before city infrastructure has been improved to cope with the projected level of growth and intensification.

HEAT ISLAND / TEMPERATURE REGULATION EFFECTS



The estimated increase in average air temperatures in an Auckland suburb 20 years from now due to climate change will be compounded by further loss of green space as intensification occurs. Research suggests that a 10% loss of green space (as a proportion of the total area) could add 0.3 °C of warming on top of the 0.5-1.0 °C already caused by climate change.



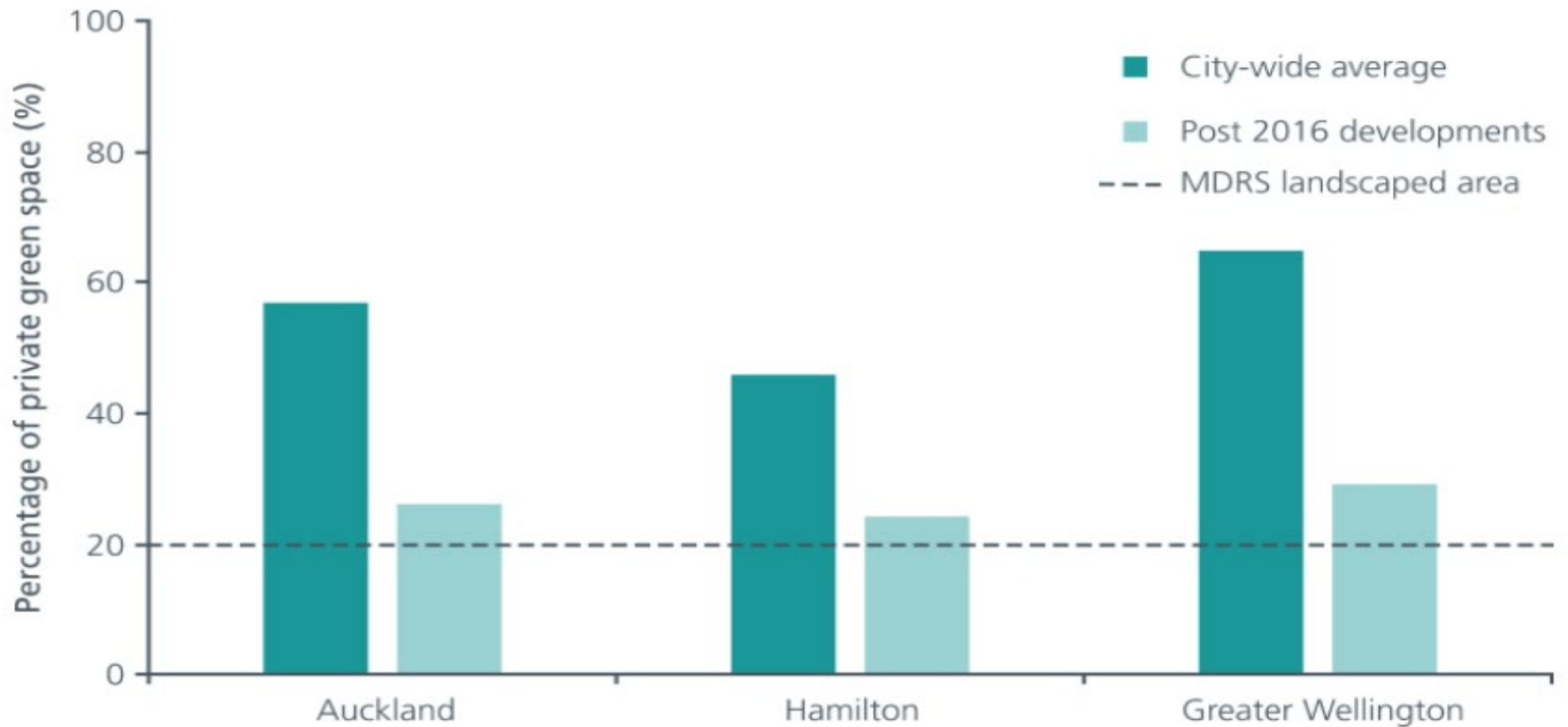
This image, captured with an infrared camera, reveals the surface (not air) temperature on a sunny summer afternoon in January on a treelined street in central Wellington. The yellow areas are hotter surfaces, and the blue/black areas are cooler. The air temperature was 23 °C. The surface temperatures at two locations are shown at the top left of the image. The pavement in full sun is 47.7 °C whereas the ground under the tree is 20.3 °C.



A Hutt City example in Cambridge Tce: Hard surfaces, minimum permeable surface, minimal spaces for larger shade trees, maximum reflectivity. In winter, the opposite effect due to shading (tight proximity / canyoning) is possible (also wind tunnel effects).

VISUAL AMENITY, SENSE OF PLACE, RECREATION, HEALTH AND MENTAL WELL-BEING EFFECTS

The Medium Density Residential Standards in particular are likely to place continued pressure on private green space in years to come.



Green space as a proportion of private residential land: city-wide averages versus post-2016 developments. The Medium Density Residential Standards (MDRS) require at least 20% of all development sites be kept as landscaped areas, a lower proportion compared to current averages.

TYPICAL EXAMPLE: ROSE WAY – WATERLOO, LOWER HUTT

Eight dwellings on ~966 m² site where formerly two plus a corner dairy once stood



Negative Attributes: Lack of privacy; Overlooking. Minimal Green Space / Small Courtyards. Maximum Hard Surfaces. Minimal / No Storm Water Retention. Heat Island Effects. Lack of Individuality or Sense of Place. Minimal access to public reserves – HCC PAOS Report (November 2013) – Valley Floor Reserves Review identified many parts of Hutt City suffered from a paucity of reserves (walking distance within 800 m).

TYPICAL EXAMPLE: TREADWELL MEWS – NAENAE, LOWER HUTT

Nine dwellings on ~2000 m² site where formerly a church and one dwelling once stood



Negative Attributes: Lack of privacy; Overlooking. Minimal Green Space / Small Courtyards. Maximum Hard Surfaces. Minimal / No Storm Water Retention. Heat Island Effects. Lack of Individuality or Sense of Place. Single storey dwellings situated behind bulkier two storey dwellings with potential for shading (especially in summer due to solar transect).

RATA ST PROFILE OF TREADWELL MEWS – NAENAE, LOWER HUTT



Negative Attributes (as per previous slide): Lack of privacy; Overlooking. Minimal Green Space / Small Courtyards. Maximum Hard Surfaces. Minimal / No Storm Water Retention. Heat Island Effects. Lack of Individuality or Sense of Place. Single storey dwellings situated behind bulkier two storey dwellings with potential for shading (especially in summer due to solar transect).

TYPICAL EXAMPLE: BOB SCOTT RETIREMENT VILLAGE - AVA, LOWER HUTT

South and East facing multi-rise apartments with no access to west or north facing rooms are shaded for the bulk of daylight hours from autumn solstice to spring solstice due to their orientation with respect to solar transect.



TYPICAL EXAMPLE: 182/183 CAMBRIDGE TCE – EPUNI, LOWER HUTT

14 dwellings on ~1040 m² site where formerly two dwellings once stood



Negative Attributes: Lack of privacy; Overlooking (internal/external to site). Minimal Green Space / Small Courtyards. Maximum Hard Surfaces. Minimal / No Storm Water Retention. Heat Island Effects. Lack of Individuality or Sense of Place. Winter shading. Canyon / Wind-Tunnel effects. No on-site Parking for any of 14 apt's.



POOR OVERSIGHT OF OUTCOME OBJECTIVES PROPOSED UNDER PC 56: ZONING ON MAP SHOWS 6 STOREY APARTMENT BUILDINGS PERMITTED WITHIN 800 M OF PETONE STATION – THE IMAGE BELOW IS WITHIN 800 M FROM PETONE STATION ON KOROKORO ROAD!!

THIS ROAD IS A STEEP STREET WITH PRECIPITOUS LAND ABOVE AND BELOW IT. DID ANYONE FROM HCC PHYSICALLY GO AND CHECK WHAT WAS PROPOSED ON THE MAP WITH REALITY BEFORE THE NEW INTENSIFICATION ZONES WERE PROPOSED?



ANOTHER POINT OF EMPHASIS OF THE 800 M ZONE RULE (PETONE STATION) – ALL OF THE WOODED HILLY AREA IS WITHIN THE 800 M RADIUS – HOW APPROPRIATE IS INTENSIFICATION ON THIS SITE (OR OTHERS LIKE IT SUCH AS THE LOWER SLOPES OF NORMADALE OR HARBOURVIEW THAT ARE ALSO WITHIN 800 M OF A TRANSPORT HUB)?



CLIMATE CHANGE; FLOODING AND WATER RETENTION



Increasing how much land is covered by impermeable surfaces will considerably change how this water moves through cities. For a rainfall event that delivers 24 millimetres of rain in 24 hours, a section with 65% of the land covered by an impervious surface will have 18% more runoff than a section with 55% of the land covered by an impervious surface.

Source – PCE report 21 March 2023

HUTT CITY IS BUILT ON A FLOOD PLAIN. ITS CURRENT STORMWATER SYSTEMS ARE NOT ALWAYS BUILT TO COPE WITH CLIMATIC EVENTS THAT IMPACT ON THE EXISTING BUILT ENVIRONMENT LET ALONE ONE THAT IS PROPOSING ADDITIONAL INTENSIFICATION BUT WITHOUT THE CONCOMITANT UPGRADES OF THE EXISTING NETWORK. THERE ARE ALSO WEAK POINTS IN THE EXISTING FLOOD PROTECTION NETWORK (STOPBANKS)

MANY RAIN EVENTS DELIVER MORE THAN 24 MM RAIN IN 24 HR IN HUTT CITY!
(SEE NEXT SLIDES)

TYPICAL EXAMPLE: UDY STREET – PETONE, LOWER HUTT: 15 NOVEMBER 2016



90 mm RAIN IN 24 HR PERIOD – FLOODING IMPACTS FURTHER EXACERBATED BY EARTHQUAKE LIQUEFACTION

TYPICAL EXAMPLE: ALL OF HUTT VALLEY – DECEMBER 1976



300 mm RAIN IN 24 HR PERIOD WITH MAJORITY OF THAT FALLING WITHIN A 12 HR PERIOD. THIS VIEW SHOWS CORNISH ST, PETONE LOOKING EAST.

TYPICAL EXAMPLE 2: ALL OF HUTT VALLEY – DECEMBER 1976



IN THIS SECTION OF SH2 AND CORNISH ST, ONE SMALL STREAM PLUS SURFACE AREA RUN-OFF CAUSED ALL OF THIS DESTRUCTION IN AN INTENSELY BUILT-UP AREA. REPEATS OF SUCH 300 mm EVENTS ARE WELL WITHIN THE CURRENT CONFINES OF CLIMATE CHANGE.

CONCLUSIONS

1. The examples shown in the preceding pages illustrate the pitfalls of poorly planned and uncoordinated urban intensification.
2. The Hutt Valley's built environment is extremely vulnerable to the impacts of climate change and earthquakes and its existing infrastructure is unable to cope with many of the existing challenges it faces let alone the compounding impacts brought about by increased urban intensification.
3. The Parliamentary Commissioner for the Environment has published a sobering report on the current concerns facing NZ's urban areas that are currently undergoing intensification – The environmental and amenity services provisions that are lost due to intensification have not been properly considered with respect to the zone changes proposed under plan change 56.
4. Previous plan changes approved in Hutt City (PC12 and PC43) allow for ample intensification under existing rules that can adequately meet the central government requirements mandated under the relevant NPS for housing. The loss of diversity in urban built form zones proposed under PC56 is a legitimate concern that has not appropriately been addressed.

CONCLUSIONS (continued)

5. If PC56 is approved it will result in a 'bomb' being dropped on our city and will end any integrity or creditability our DP may have had. Surely if Hutt City is to become a vibrant place to live we need not only a diversity of people but also of places and environments to live.
6. The SRAA's mandated in the current DP should be retained given their importance to the city landscape. They benefit the city in many ways (mature vegetation, a sense of space, provision of diverse housing options and ability to contribute to attracting a wide range of people to live in Hutt City).
7. Council offices have advised that there will still be a forthcoming full review of the DP after PC56. If PC56 is approved, the 'bomb' will have already been dropped and a full DP review will be meaningless.
8. In conclusion I urge commissioners charged with protecting the interests of all residents in the Hutt City to reject plan change 56 and send it back to council to be dealt with as an integral part of the full DP review. PC43 is currently a sufficient response to intensification in terms of the NPS (even though it is clearly leading to poor urban-form and built-environment outcomes in our city).