

**SUBMISSION ON
HUTT CITY COUNCIL - PROPOSED DISTRICT PLAN**

To: Chief Executive, Hutt City Council
district.plan@huttcity.govt.nz

Submission on: Proposed Lower Hutt District Plan 2025

Name of Submitter: Chris Moore

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I can confirm that I have not trade competition advantage by lodging this submission.

I can confirm I wish to be heard at the hearing.

This is a submission on the proposed Hutt City District Plan in respect to 3A Nikau Grove, Woburn. This submission opposed the presence of the flood hazard overlay on this site and the methodology to determine the flood hazards. The reasons for this objection to the flood hazard overlays, and the relief that is sought is outlined in the submission below.

The property at 3A Nikau Grove is flat, 2453m² in area, with a dwelling located within the rear portion of the site. The site is within the High Density Residential Zone of the District Plan and has a Flood Hazard Overlay currently located within its confines. The flood hazard overlay extends over the majority of the site and is comprised of a High, Medium and Low Flood Hazard Overlays. In the time we have lived in the property, I have never once observed the watercourse that on the neighbouring properies (but is piped on our site) ever being in flood.

I oppose the presence of these flood hazard overlays for the following reasons:

- The stream that is present on the site is a small spring fed stream. The stream does not have a large catchment and does not produce any significant flooding due to its short length. The High Flood Hazard Overlay has very restrictive rules that apply to future development and esstentially prevents further development on the sites where this overlay exists. Given the level of risk presented by the waterbody on the site, the High Flood Hazard Overlay is an unreasonable level of restriction to the applied to the property and needs to be removed in reflection to the low risk that the waterbody presents.
- The inundation overlay on 3a Nikau Grove suggests that the inundation extent on the property comes from flooding that breaks out of the strean bank at Hutt Recreation

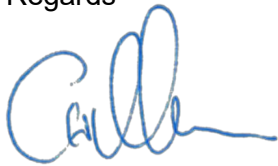
Grounds. I would contest whether this flood would occur. The flooding on the site would require the flood waters to travel a large distance, over a number of geographic features such as road humps, housing etc. This flood extent would also require the flood waters to turn 180 degrees from their starting position, where the natural flow paths are down Ludlan Crescent. We are of the view that the extent of the inundation overlay within the Nikau Grove is over convoluted and does not represent that likely level of flooding that this site would experience. We would like for this area to be remodelled and for the inundation extent to either be removed or reduced.

- We are also unsure of the depths of the water within the inundation model. If the mapped extents includes inundation less than 100mm in height, then we believe that the District Plan should not be seeking to control development in respect to these shallow depths and that all mapping with water less than this depth is removed from the District Plan maps.
- The flood hazard overlays are based on a climate change prediction that is considered to be unlikely to occur by the IPCC. It is considered that there is about a 1% chance of this climate change scenario arising. As such, a more realistic scenario should be used for the sea level rise model that feeds into the flood model.
- The flood modelling does not take into account any pump or flood defence upgrades that may occur. As such, the flood model represents a higher level of flooding than what is likely to occur, simply due to infrastructure upgrades that will occur over the next 100 years. The modelling should allow for some improvements in flood defence infrastructure over this time period. To ignore this is to ignore the reality of what will happen.
- I understand that the Government is about to announce a lower RCP of 6 or lower is to be used in making decisions around climate change. When this announcement is made then the model should represent this national direction rather than this improbable scenario used in this modelling.
- I also oppose the objectives, policies and rules around the flood hazards as they make them undesirable for development and I would like to see these to be more enabling, particularly in relation to the High Flood Hazard Overlay the Medium Flood Hazard Overlay.
- The proposed flood hazard overlay assumes a climatic position and sea level position in 100 years time which is unknown and then maps the flood hazard on this assumption. As such, the flood hazard does not represent the 1:100 year event for current climatic conditions, but a much worse assumption as it is based on higher inputs. This means we get all the downside mapped on the hazard, but no acknowledgement of any potential flood improvements as identified in a previous point. The flood maps therefore represent a flood hazard event that will not be realised and therefore provides unreasonable restrictions onto property owners.

It is important that the flood hazard extents are accurate for a site as they could have insurance implications as well as making the property less desirable for future purchases. I remain of the view that the mapping used is very conservative and represents a level and extent of inundation that is not reflective of what would occur in reality. I therefore request that the modelling in respect of 3A Nikau Grove is reviewed, and is corrected.

Please contact myself on Chris Moore on chris@toroequities.com or [REDACTED] if you have any questions regarding this submission. I would also invite a site visit so that I can explain my submission to the Council.

Regards



Chris Moore
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[REDACTED]