



Further Submission for the Proposed District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Privacy Statement

Your further submission must include your name, and an address for service (preferably email, but you can use a postal address). All information you include in this further submission, including your name and address for service, will be provided to other submitters and published on Hutt City Council's website. Paper copies may also be made available. Hutt City Council is required to collect and publish this information to carry out its functions under the Resource Management Act 1991 and to enable others to take part in the district plan process. The Council, other submitters, and the Environment Court may need to contact you during this process.

If your further submission does not include your name and an address for service, it will be rejected.

While the Council will retain all information provided in your further submission in secure council systems, all contact details will be removed from any documents published on Council's website once the district plan process is complete. However, your name and the contents of your further submission will still appear in these documents.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at contact@huttcity.govt.nz call 04-570-6666, or write to us at Private Bag 31912, Lower Hutt 5040.

To: Chief Executive, Hutt City Council

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

Full Name	Last <u>Rachlin</u> First <u>Michael</u>	
Company/Organisation		
Contact if different		
Address	Number <u>321a</u> Street <u>Muritai Road</u>	
	Suburb <u>Eastbourne</u>	
	City <u>Lower Hutt</u>	Postcode <u>5013</u>
Address for Service if different	Postal Address	
Phone	Home	Work
	Mobile	
Email		

RMA Form 6



2. This is a **further submission** in support of or opposition to a submission on the Proposed Lower Hutt District Plan.

3. I consider that, under Clause 8 of the First Schedule of the Resource Management Act, I may make a further submission because:

I represent a relevant aspect of the public interest

Please give details:

I have an interest in the Proposed Plan Change that is greater than the interest of the general public

Please give details:
I am a submitter on the Proposed Hutt City District Plan and also own property within the city likely to be affected by the provisions of the proposed plan.

I represent Hutt City Council

4. I support or oppose the submission of:

Name and address of original submitter and submission number of original submission:
See attached table

(Please use additional pages if you wish)

5. The particular parts of the submission I support or oppose are:

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal
See attached table

(Please use additional pages if you wish)

RMA Form 6



6. The reasons for my support or opposition are:

Please give reasons:
See attached table

(Please use additional pages if you wish)

7. I seek that the whole or part [*describe part*] of the submission be allowed or disallowed:

Please give precise details:
See attached table

(Please use additional pages if you wish)

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


(Please tick one)

9. 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)

	<p>Date 22/7/25</p>
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A signature is not required if you make your submission by electronic means

Submitter	Submission Point	Support/Oppose	Reason	Submission point allowed/disallowed
Natural Hazards Commission Toka Tū Ake	327-061	Oppose	SUB-O2 clause 5 duplicates the objectives in the Natural Hazards and Coastal Environment chapters.	Disallow
Natural Hazards Commission Toka Tū Ake	327-031	Oppose	The amendment exacerbates the inappropriateness of NH-O2 as it further increases the regulatory threshold in NH-O2 over that contained in NH-O1 for high hazard areas. As such development in low and medium natural hazards overlays must achieve a higher regulatory threshold than development in the High Natural Hazards overlay. This seems at odds with the general thrust of the submitter's submission.	Disallow
Natural Hazards Commission Toka Tū Ake	327-053	Oppose	The amendment lacks the necessary certainty required for a permitted activity standard.	Disallow
Natural Hazards Commission Toka Tū Ake	327-057	Oppose	The amendment lacks the necessary certainty required for a permitted activity standard.	Disallow
Natural Hazards Commission Toka Tū Ake	327-084	Oppose	The amendment lacks the necessary certainty required for a permitted activity standard.	Disallow
Wellington Regional Council	452-16	Oppose	<p>The wording of the objective only applies to urban form and built environment, and as such the submitter's amendment simply duplicates UDSD-O1 and UDSD-O2 and would not achieve the outcome sought by the regional council's submission.</p> <p>UDSD-O1 and UDSD-O2 (clause g.) already address resilience to climate change. The definition of Well-Functioning Urban Environment includes, "resilient</p>	Disallow

			to the likely current and future effects of climate change". This term is used in UDSD-O1.	
Wellington Regional Council	452-18	Oppose	<p>The addition of the term "environmental" adds confusion in the interpretation of this strategic objective, as the word "environment" is defined in Section 2 of the RMA but "environmental" is not defined in the Proposed District Plan. This raises the question of whether "environmental" is the same as "environment". If not, then it needs to be clearly defined.</p> <p>The RMA definition for "environment" includes a broad range of matters including natural and physical resources, ecosystems and social, economic, and cultural conditions affecting these matters. This appears wider than what is intended by the submitter.</p>	Disallow
Wellington Regional Council	452-72	Oppose	<p>The information supplied with the submission does not allow property owners to determine if any changes are sought to flood hazard overlays affecting their property. The information should have been provided on property-based maps at an appropriate scale to enable this to happen. This raises issues of natural justice and the ability of affected property owners to be able to fully engage with the plan making process.</p> <p>The oversight of not including rivers and waterways and land immediately adjoining them in the notified flood hazard overlays raises question marks over the robustness and thoroughness of the peer review process.</p>	Disallow

Wellington Regional Council	452-97	Oppose	The amendment lacks the necessary certainty required for a permitted activity standard.	Disallow
Wellington Regional Council	452-102	Oppose	The amendment lacks the necessary certainty required for a permitted activity standard.	Disallow
Wellington Regional Council	452-103	Oppose	Making an activity the same non-complying activity status in Medium Flood Hazard overlays as the High Flood Hazard overlay is not a risk-based approach as it does not distinguish the different level of risk between the two overlays.	Disallow
Wellington Regional Council	452-189a	Oppose	<p>The outcomes sought by this objective duplicate those in the Building Act, the Civil Defence Emergency Act 2002 (S60 for lifeline utilities), and sector-based utilities/infrastructure based legislation and regulations such as such as the Electricity Act 1992, Electricity (Safety) Regulations 2010 etc. The Building Act already has requirements for different resilience elements (salt spray, wind zones etc.). These are regularly updated.</p> <p>The submitter has not identified a regulatory gap which would justify the district plan stepping into the setting of performance standards for individual buildings and infrastructure.</p> <p>It is not efficient or effective for resource management plans to duplicate other legislation and regulations. This is reinforced by the requirements of s18A(b)(i) of the RMA.</p>	Disallow
Wellington Regional Council	452-189f	Oppose	The policy only seeks to “promote” and “enable” buildings and structures to withstand predicted future higher temperatures, intensity and duration of rainfall. This does not give effect to the submitter’s new objective in submission point 452-189a which	Disallow/amend

			<p>requires this to happen (in other words it requires the setting of performance standards for buildings and infrastructure).</p> <p>I would recommend that the policy is reworded in a way that allows the proposed district plan to set standards and rules across the plan which do not create a barrier to buildings and infrastructure meeting the requirements of other legislation and regulations to withstand natural environmental effects forecast to change due to climate change.</p>	
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Copy served on:

Wellington Regional Council: Richard Sheild - regionalplan@gw.govt.nz

Natural Hazards Commission Toka Tū Ake: Sarah-Jayne McCurrach - resilience@naturalhazards.govt.nz