

Ian Cassels  
Director

18 March 2025

Chief Executive  
Hutt City Council  
By email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

## Proposed District Plan Submission – 41 Percy Cameron Drive, Avalon

1. This submission is from **A Investment Company Limited**, which owns **41 Percy Cameron Drive, Avalon**.
2. The address for service is:  
  
**Otter Projects Ltd**  
[seb@otterprojects.nz](mailto:seb@otterprojects.nz)  
25 Rutherford Street Lower Hutt.
3. I **could not** gain an advantage in trade competition through this submission.
4. The specific provisions of the proposal that my submission relates to the following planning controls being placed on the subject site:
  - a. Light Industrial Zone
  - b. Historic Buildings and Structures Overlay
  - c. Specific Height Control Overlay (12m)
  - d. Industrial Main Through Route Frontage Overlay.

## Submission

5. My submission is in **opposition** to the Light Industrial Zone, and I propose that the Mixed Use Zone, with its potential better to reflect the evolving use and development of the precinct, would be a more suitable alternative for the existing Avalon Business Activity Area zone:
  - a. The Mixed Use Zone better reflects the evolving use and development of the precinct and will allow for the adaptive reuse of an existing physical resource.

- b. A large volume of residential use has been consented to in the precinct, evidencing that residential uses can co-exist with other commercial uses in the precinct. It equally evidences a lack of demand for industrial uses.
  - c. Due to changes in economic activity, the primary function of the precinct is no longer light industrial, and a Mixed Use Zoning better reflects the current and future uses of the land.
  - d. Mixed Use Zoning still enables light industrial uses within limits.
  - e. Mixed Use Zoning would facilitate a greater range of functions on the land.
  - f. Mixed Use Zoning would better reflect the extent of residential use (in part) within the precinct.
  - g. Mixed Use Zoning is more likely to be compatible with the immediately surrounding residential uses.
  - h. The Mixed-Use Zone is more regionally consistent. For example, the Wellington City District Plan provides for similar precincts (e.g., Hutt Road, Centennial Highway, Kingsford Smith Street) as Mixed-Use Zones. Similar precincts in Paremata, Waitangirua, and Kenepuru are zoned Mixed-Use in the Porirua District Plan.
  
- 6. I **oppose** the listing of the site as a Historic Building for the following reasons:
  - a. The building does not have significant historic heritage values.
  - b. The heritage listing does not encourage adaptive reuse. Although adaptive reuse is already underway, the heritage listing increases compliance and consenting costs, reducing its viability.
  
- 7. I **support** Policies HH-P3, HH-P5, HH-P6 and HHP-P7. I support Policy HH-P4, specifically the inclusion of *adaptive reuse* as defined in the 2025 PDP, and the inclusion of *significant* as a policy threshold for the protection of HH from *inappropriate* redevelopment and reuse.
  
- 8. I **oppose** the proposed Industrial Main Through Route Frontage Overlay.
  
- 9. I **oppose** the proposed 12-metre height limit for the following reasons:
  - a. The precinct is a strategic site with a large land area with significant potential to deliver housing and commercial space to the city.
  - b. The adjoining High Density Residential Area has a 22-metre height limit
  - c. The existing building exceeds the proposed 12m height limit.
  - d. There appears to be no section 32 analysis of the proposed height limit.
  
- 10. I seek the following decisions from the Council:
  - a. Apply the Mixed Use Zone to the existing Avalon Business Activity Area .
  - b. Remove the proposed heritage listing of 41 Percy Cameron Drive, Avalon.

- c. Retain Policies HH-P3, HH-P4, HH-P5, HH-P6 and HHP-P7, without amendment.
- d. Replace the 12m height limit with a 22m height for 41 Percy Cameron Drive, Avalon.

11. I wish to be heard in support of my submission.

12. I agree to the privacy statement on the Council's District Plan Review website.

A handwritten signature in black ink, consisting of a large loop followed by a horizontal line and a long, sweeping tail.

Director

A Investment Company Limited