

RMA FORM 5

Submission on publicly notified proposed district plan change

Clause 6 of Schedule 1, Resource Management Act 1991



To: Chief Executive, Hutt City Council

1. This is a submission from:

Full name	Last BRENTON-RULE First TONY	
Company/organisation		
Contact if different		
Address	Unit Number 10 Street NGAIO STREET	
	Suburb EASTBOURNE	
	City LOWER HUTT	Postcode 5013
Address for Service if different	Postal Address	Courier Address
Phone	Day	Evening
	Mobile	
Email	thebrsnz@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:

Title of Proposed District Plan Change: Proposed Lower Hutt District Plan

3. I ☐ could ☒ could not gain an advantage in trade competition through this submission.
(Please tick one)

4. 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.

5. The specific provisions of the proposal that my submission relates to are:

Give details:

My submission reflects details relating to Hutt City's obligations to their ratepayers and provides supporting evidence for existing Hazards and possible mitigations which need reflecting in the Hutt City District Plan.

Please refer to the attached submission:

Reference: Eastbourne/

Dated: 22 April 2025

(Please use additional pages if you wish)

6. My submission is:

Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views:

Please refer to the accompanying submission, which answers the above request.

(Please use additional pages if you wish)

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

Give precise details:

The Hutt City Council's agreement to meet its obligations under the two Acts highlighted in my submission including:

- a) Making a formal decision that Hutt City Council acknowledges it has obligations under the two Acts noted in this submission and is accountable to deliver on this responsibility.
- b) Agreeing to proactively advise Eastbourne ratepayers and owners of property on possible mitigation strategies to promote the reduction of the risk of hazards occurring; thereby supporting the Hazard category being lowered.
- c) Deciding to include existing solutions of an engineering approach used already in Eastbourne that has proved to be successful in mitigating coastal Hazards; thereby reducing the Hazard category to a lower setting.
- d) Providing an informed response to Section 13 of my submission regarding the prograding accumulation of gravel along the Eastbourne beach foreshore and the significant beneficial effects of this.

(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)

	22 April 2025 Date
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*(a signature is not required if you make your submission by electronic means)***Privacy Statement**

The information you provide in this submission, including your name and contact details, will be provided to other submitters and published on Hutt City Council's website. Hutt City Council is required to collect and publish this information under the Resource Management Act 1991. Your contact details will be removed from Council's website when the further submissions process has been completed, however your name will still appear in the hearing and decision reports.

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 informationmanagementteam@huttcity.govt.nz or call 04-570-6666.

Where to send your submission

- **By email (preferred):** district.plan@huttcity.govt.nz
- **By post:** Hutt City Council, Private Bag 31912, Lower Hutt 5040
- **In person:** At the Hutt City Council Customer Service Centre, 30 Laings Road, Lower Hutt

22 April 2025

SUBMISSION TO HUTT CITY RE LOWER HUTT'S PROPOSED DISTRICT PLAN**Request**

Within seven (7) days of your receipt of this submission:

1. Please confirm your receipt, to the email address given in the property details below.
2. If submissions to Hutt City are given an accession number or other identifier, please advise what this number / identifier is.

1. Submission Sections

There are seventeen (17) sections in this submission. They are:

1. Submission Sections
2. Map of the locality and the features of it that are referenced in this submission
3. The Location
4. The Homeowner's property
5. Background
6. Property Report
7. Scope
8. Legislative Obligations
9. Resource Management Act
10. Local Government Act
11. How well is Hutt City meeting its legislative obligations?
12. The height above sea level and Karamu Street slope problem
13. Decadal Shoreline Stability in Eastbourne, Wellington Harbour
14. Homeowners could be encouraged to take useful action
15. Hutt City communication with homeowners and ratepayers
16. What happens next?
17. An assumption that Hutt City would be wrong to make

Intent

It is hoped this submission will be seen as collegial, not adversarial. The issues that we all face will benefit from cooperation and understanding.

Photographs

Photographs are provided in the submission, numbered 1 to 16. Their purpose is illustrating facts more graphically and economically than can words.

Text bolding and yellow highlighting

These are used sparingly to highlight and/or provide easy reference to certain text.

Questions

Questions which Hutt City is asked to answer are in this submission. In each case they are placed under a bolded heading, reading Question. There are twenty-two (22) questions in total, numbered sequentially from Question 1 to 22.

4. The Homeowner's Property

Homeowner's Property	Property Reference – Rates invoice
10 Ngaio Street Eastbourne Lower Hutt 5013	Property Key: 7104600 Lot Plan: PT LOTS 53 & 54 DP 199 WN402/164
Email: thebrsnz@gmail.com	Phone: [REDACTED]
Signature:	

5. Background

In early March 2025 an addressed envelope was delivered to homeowners, within which was a two-page undated letter from Hutt City.

The opening paragraph reads: "Submissions are now open on Lower Hutt's Proposed District Plan, which includes changes that could affect your property."

This submitter prepared a response to the Hutt City letter, by way of a written submission, which was emailed to Hutt City on 06 April 2025, as quickly as was possible for him. A very fast, welcome and comprehensive email reply was received from Stephen Davis, a Senior Policy Planner for Hutt City, on 07 April 2025. This was followed by an excellent telephone conversation, initiated by him, with Stephen on the afternoon of April 7th.

Points made by Stephen focused on the benefits that could be realised if I was to resubmit in a format that better fitted with Hutt City's planning needs.

Unfortunately, this was not possible. There were two reasons for this:

Firstly, the information made available to me by Stephen was not provided to homeowners at the time when the letter from Hutt city was received by them. My response to that letter was therefore framed without knowledge of what would have been preferable from Hutt City's perspective.

Secondly, it took me just on two weeks to do the research into the local issues that informed my submission and to write for Hutt City, in what I hoped would be a useful format, also providing references to recently published information and photographs to illustrate the points I was making.

I am a busy person and did not have the needed time to rewrite my submission.

Since the above, Hutt City has extended the submission deadline and made known additional information on how a submission could be most usefully structured.

Unfortunately, this also is too late for me. If Hutt City had made its needs known to me in the early March letter, I could have met them. It was impossible for me to do so in the following weeks after I became aware of Hutt City's preferences.

This document you are reading is my submission in response to the letter from Hutt City. It is not identical to the submission that I submitted on 06 April 2025 and should replace that earlier document in Hutt City's records.

6. Property Report

The Property Report for each ratepayer's property was provided as an online link in each letter and provided the below summary referencing zones and their associated scale of risk:

1	Zone	Medium Density Residential Zone
2	Hazards and Risks	Medium Coastal Inundation
3	Hazards and Risks	High Flood Hazard
4	Hazards and Risks	Low Tsunami Hazard
5	Other	Coastal Environment

Numbers 1 to 5 in the above table are for reference purposes.

7. Scope

This submission focuses on numbers 2 (Medium Coastal Inundation) and 3 (High Flood Hazard) in the table immediately above. The submission raises questions, suggests means by which risks can be identified, reduced and ameliorated by Hutt City and outlines services provided free by local residents along with sourced information that Hutt City may wish to be made aware of.

8. Legislative Obligations

Hutt City has obligations under the provisions of two Acts. These are the:

- Resource Management Act 1991 and
- Local Government Act 2002

The Acts require Hutt City to identify, review, reduce and ameliorate risks regarding:

- *natural hazards, negative effects, stormwater, drainage and flood protection.*

These two Acts are considered below. For the purposes of this submission yellow coloured highlighting is used to identify where the *italic phrases* above are mentioned.

9. Resource Management Act (RMA)

A replacement for the RMA is in development, however at present, the provisions of the existing RMA are applicable. The RMA (as amended since 1991) is available here:
<https://www.legislation.govt.nz/act/public/1991/0069/latest/whole.html#DLM232574>

The numbers and letters at the left below are clause numbers in the legislation.

“Cl 31 Functions of territorial authorities under this Act

reads inter alia, quote:

“(1) Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:

- (a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.
- (b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—
 - (i) **the avoidance or mitigation of natural hazards”**

10. Local Government Act 2002 (LGA)

The LGA - Version as at 1 October 2024 - is available here:

<https://www.legislation.govt.nz/act/public/2002/0084/latest/whole.html#DLM170879P>

The numbers and letters at the left below are clause numbers in the legislation.

Provisions under the LGA read inter alia, quote:

“2 Groups of activities

- (1) A long-term plan must, in relation to each group of activities of the local authority,—
 - (a) identify the activities within the group of activities:
 - (b) identify the rationale for delivery of the group of activities (including the community outcomes to which the group of activities primarily contributes):
 - (c) outline any significant **negative effects** that any activity within the group of activities may have on the social, economic, environmental, or cultural well-being of the local community:
- (2) In this schedule, each of the following activities is a group of activities:
 - (c) **stormwater drainage:**
 - (d) **flood protection and control works:**

8 Additional content of statement of intent

- (1) This clause applies to a council-controlled organisation that provides services, other than under a contract or similar arrangement, in relation to the following groups of activities:
 - (c) **stormwater drainage:**
 - (d) **flood protection and control works:**

50 Additional information to be included in annual plan: groups of activities

- (1) For the purposes of [clause 49\(1\)\(g\)](#), an authority's annual plan must, in relation to each group of activities of the authority,—
 - (a) identify the activities within the group of activities:
 - (b) identify the **rationale for delivery** of the group of activities (including the **community outcomes** to which the group of activities primarily contributes):
 - (c) outline any significant **negative effects** that any activity within the group of activities may have on the social, economic, environmental, or cultural well-being of the local community:
- (2) For the purpose of subclause (1), each of the following activities is a group of activities:
 - (c) **stormwater drainage:**
 - (d) **flood protection and control works:**

101A Financial Strategy

- (3) The financial strategy must—
 - (a) include a statement of the factors that are expected to have a significant impact on the local authority during the consecutive financial years covered by the strategy, including—
 - (ii) the expected capital expenditure on network infrastructure, **flood protection, and flood control works**

101B Infrastructure strategy

- (1) A local authority must, as part of its long-term plan, prepare and adopt an infrastructure strategy for a period of at least 30 consecutive financial years.
- (6) In this section, **infrastructure assets** includes—
 - (a)
 - (iii) **stormwater drainage**
 - (iv) **flood protection and control works**

11 How well is Hutt City meeting its legislative obligations?**Question 1**

The question, How well is Hutt City meeting its legislative obligations? cannot be answered by Hutt City property owners and rate payers as they lack detailed knowledge of Hutt City's operations. However, evidence observed by residents since 2013 and by inspection and photography during March 2025 indicates that there is considerable room for improvement.

11.1 Summary of suggested improvements that could improve dialogue

This submission seeks to be collegial, not adversarial. The issues that we all face – for both submitters and Hutt City – are very important and will benefit from cooperation, understanding and shared tikanga; based on experience and learning, whilst being based in logic and common sense.

At the outset when presenting material of this nature we suggest Hutt City:

- a) Consult, in person, with homeowners and ratepayers prior to releasing this Lower Hutt's Proposed District Plan.
- b) Reflect a date on the notification letter to ratepayers and homeowners.
- c) Set a longer timeline for the closing date for submissions, See Section 15.
- d) Communicate proposed ideas and planned actions in plain English, enabling your audience to understand what is proposed by Hutt City.
- e) Place greater emphasis on understanding the significant and material financial effects that the plan could have on homeowners such as, the elderly, health challenged and disadvantaged persons.

Where appropriate throughout this submission, twenty-two (22) questions in total are asked, for which written answers from Hutt City are sought. To ensure maximum benefit from the questions and answers, we ask Hutt City to provide these questions and answers to all homeowners and ratepayers who received Hutt City's letter in March 2025.

Suggestions are given in this submission that provide Hutt City opportunities for improvements that can be readily made; especially those that are easy and low cost to implement. The problems currently being experienced by the residents identified in this response paper are supported using descriptive text and photographs.

The problems highlighted in this paper are work that should be done on a regular basis by Hutt City, to ameliorate and prevent hazards. Currently, some of this is being done voluntarily and without payment by some local homeowners. See Section 11.2.

Although not sought in Hutt City's letter, suggestions have been given in this submission regarding other contributions homeowners could make and action relating to their own property to minimise hazards. See Section 14.

This submission recommends that Hutt City:

- f) Seeks cost savings
- g) Ensures efficient use of resource, with appropriate accountabilities in place
- h) Takes on community views – actively listens to the voice of their customers
- i) Helps to make safe the places where Hutt City homeowners and their families reside
- j) Provides collateral which enables homeowners and their communities to learn how they can actively contribute as individuals, to support Hutt City by advising it of our communities of practical beneficial actions and practices they can put in place and thereby contribute further to the protection of our communities and voters.

Together we face an 'all of Aotearoa New Zealand' challenge, it goes beyond Hutt City and the eastern harbour bays. Putting aside a single-minded intent and purpose by a powerful entity enables the best way forward in a genuine democracy, reflecting kaitiaki and tautiaki for its people.

11.2 Supporting Evidence

This evidence is presented below, focusing on the water catchment area for Ngaio and Karamu Streets in Eastbourne; these two streets (i) being fed by water from the hills above Muritai Road and (ii) connected by (a) the Karamu/Ngaio Walkway at the end of Ngaio Street, and (b) the drain underneath the Walkway.

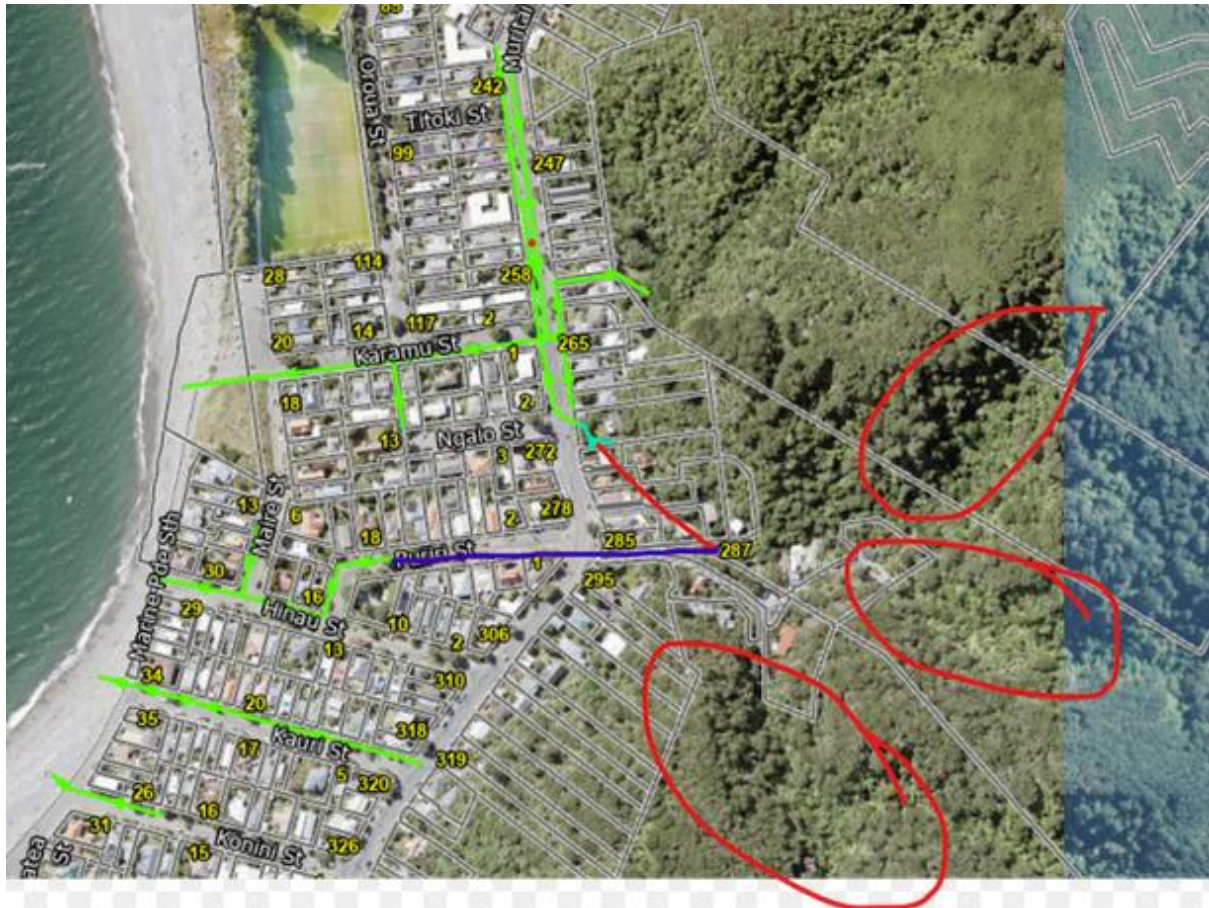
- k) **Blocked grating at the beginning of Muritai Track to Butterfly Creek.** Entry of water coming off the hills of the track through this grating into the drain beneath must be significantly impaired by the debris under the grating.

Photo 1 Taken on 18 March 2025



Evidence submitted here reflects stormwater drains are inadequate with capacity issues and are unable to function effectively due to blockages caused by leaves and other material. Blockage results in significantly impeded water flow into the drains from the steep hill catchments forming the natural watercourse flows towards the beach.

Photo 2



Stormwater from the red circled catchment areas is being directed through open drains via Muritai Road as water runoff during heavy rainfall. This causes flooding in the areas reflected in the photo by the green lines, going into resident's properties at the end of Ngaio Street and in addition causes flooding in Karamu Street.

Refer Hutt City reference 'RFS 527314, Subject: 9-11 Ngaio Street Flooding Sunday 8 August 2021 (10:30am-High tide).' Responses to this reference acknowledged the problem to residents of Ngaio Street and some property owners in Muritai Road. Hutt City Council provided the above map and proposed a list of actions that included longer term solutions which do not appear to have been included within this recent District Plan.

Photos 3 and 4

This photo shows end of Ngaio Street covered by water on 03 January 2025.



This photo taken on 08 August 2021 shows flooding outside Nos. 9 + 11 Ngaio Street.

In summary: Photos 3 and 4 show flooding across the width of Ngaio Street and pathway at its seaward end. The Karamu / Ngaio Walkway, underneath which a drain across to Karamu Street runs, is on the left-hand side of Photo 3, just to the left of the white car. Clearly, the drain is not working adequately.

Photo 5 Taken on 18 March 2025

Norfolk Pine seed pods lying in the left-hand side (LHS) gutter of Ngaio Street. When heavy rain occurs these seed pods and other debris in the gutter – on both sides of Ngaio Street – are washed down to the seaward end of the street. There they meet two gratings at the seaward end of Ngaio Street that cover sumps underneath.

Some of the Ngaio Street residents sweep up material in the gutter outside their homes and dispose of it in a responsible manner. This task becomes greater when rainfall sweeps the material down the gutters towards the end of the street. The owners of numbers 10 and 12 Ngaio Street at street-end have taken special care in this task for years, since their purchase of their properties.

The task is more urgent and significantly greater after strong wind blows seed pods from the Norfolk Pine trees onto the street and into its gutters. Residents urgently respond accordingly.

Photo 6 Taken on 18 March 2025



Leaves adjacent to and partially covering one of two gratings at the seaward end of Ngaio Street. These leaves were swept up and disposed of by a Ngaio Street homeowner before the next two photos were taken.

Photo 7 Taken on 18 March 2025



The grating has been lifted to allow a view down into the left-hand sump. Debris in the sump is up to the level of exit into the right-hand sump – see Photo 8 below.

Photo 8 Taken on 18 March 2025

The grating has been lifted to allow a view down into the right-hand sump. In addition to regularly sweeping the gutter outside his place, another Ngaio Street resident has, occasionally, raised both the gratings to enable a shovel to be used to clean out the debris in the sumps, when the need to urgently do so is obvious in-light of high forecast rainfall.

The above photographs raise the question, why do homeowners find it necessary to sweep the gutters in Ngaio Street and do so regularly? This is a voluntary and community minded action by them, for which they have never sought recompense.

Photo 9 Taken on 18 March 2025

A drain flows under the Karamu/Ngaio Walkway at the end of Ngaio Street, towards Karamu Street, there entering a sump. Photo 9 above (i) at top left shows the end of the drain under the walkway and (ii) the debris in the sump.

Photo 10 Taken on 18 March 2025



There is a grating and sump directly across Karamu Street from the end of the Karamu/Ngaio Walkway, i.e. at the corner of Karamu Street and Oroua Street. The grating on 18 March 2025 was wedged very tightly shut and showed no evidence of having been opened for some considerable time. This indicates that the sump has not been cleaned for that time. Photo 10 above showing leaf litter in the sump was therefore taken through the gap between two of the grating bars.

Suggestion

Over many years residents in the area have swept up and disposed of Norfolk Pine seedpods; removing the trees would significantly lessen the extent to which seedpods impede the function of street gutters and clog up the underground drains in the drainage system after Ngaio Street.

Question 2

Why is it necessary for homeowners to clear the drains when Hutt City is legally obligated and is paid through the rating system to provide the service?

Call to Action

One immediate action that would greatly lessen the problem would be to fell the Norfolk Pine trees in Ngaio Street. They are not indigenous to the area; provide no useful habitat for indigenous flora and fauna, birds shun them, and their root systems are not known to benefit soil structure, water holding capacity, or Mycorrhizal fungi

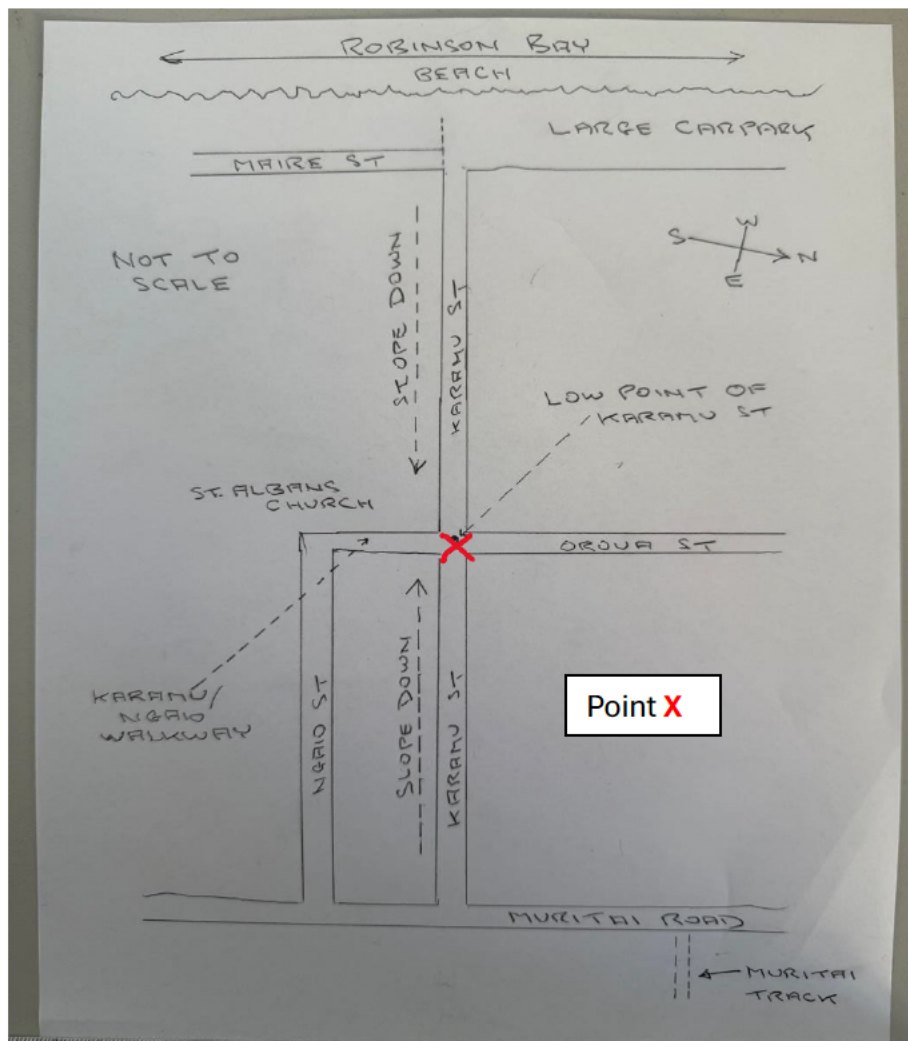
symbiotic associations. Perhaps they could be replaced with indigenous species, appropriate to the locality? In addition, drainage gutter sumps should be cleared out before/during periods of high rainfall.

l) The height above sea level and Karamu Street slope problem

See the sketch map below (Map 1) of the locality and the features of it that may assist understanding of the following points.

It is likely that Hutt City has old engineering records and plans that can quantify the matter, however observations today 20 March 2025 after rain, show the following.

- The lowest level of Karamu St is at the junction between it and Oroua St. This is the point where the Karamu/Ngaio Walkway enters Karamu St. To enable reference below, this lowest level is hereafter described as Point X.



Map 1

Flow from Ngaio Street to Point X

- All drained water from Ngaio Street is piped underneath the Karamu/Ngaio Walkway to Point X.

Flow from Muritai Road down Karamu St to Point X

- Karamu St slopes down from Muritai Road to Point X.
- On the left-hand side (LHS) - looking towards the sea - the Karamu St gutter flows from Muritai Road to the sump at the end of the Karamu/Ngaio Walkway adjacent to Point X.
- On the right-hand side (RHS) - looking towards the sea - the Karamu St gutter flows to a grating and sump at the corner of Karamu St and Oroua St.
- From here water passes under Oroua St to the sump on the other side of Oroua St, thence under Karamu St to the sump at the end of the Karamu/Ngaio Walkway adjacent to Point X.

Flow from Point X to the sea

- Karamu St rises from Point X as it approaches the sea, reaching its highest point at the corner of Maire St, Karamu St, and the large parking area beside the sea to the right.
- Because of the slope, water in gutters on both sides of Karamu St flows away from the sea downhill to Point X.
- On the RHS of Karamu St (looking towards the sea), water flows down to the grating and sump at the corner of Oroua St and Karamu St. It must then flow under Karamu St across to the other side, there meeting the sump near Point X.
- On the LHS of Karamu St (looking towards the sea), water flow is intercepted by a gutter grating and sump outside No. 21, soon after Maire St. However, thereafter, rain flowing off the street or footpath, flows down Karamu St to Point X.
- Thus, the lowest part of Karamu St at Point X receives all rainfall from the higher street surface levels to the west.
- This water load is aggravated (i) by any rainfall that flows from Muritai Road down Karamu St, and (ii) by rainfall caught in the nearer street gutters of Oroua St.

Carpark water load

- There is a large car park to the right at the corner of Maire St and Karamu St, extending from the corner, north to the HW Shortt Recreation Ground. The carpark has a high point along its S-N axis. From this high point the car park slopes (i) west towards the sea and (ii) east.
- The majority of rain falling on the portion of carpark that runs east is intercepted by a footpath gutter, which carries the water to Karamu St. From there it runs down Karamu Street to Point X.

Photo 11 Taken on 18 March 2025

The photo is taken from the corner of Karamu St and Maire St, looking NW towards the large car park by the sea.

Photo 12 Taken on 18 March 2025

Photo 12 is taken from the seaward side of the large car park, looking SE towards the corner of Karamu Street and Maire Streets.

Photo 13 Taken on 18 March 2025



Photo 13 is taken from the south end of the large car park looking towards Karamu St. Maire St is just out of sight to the right. Karamu Street slopes downward from here to Point X. If you take your eye to the vertical middle of Photo 13, you will see a slightly opened green coloured garage door on a white coloured garage on the RHS, with a small 2-door beige coloured car outside it.

Beyond that on the RHS is a black coloured larger car. It is parked adjacent to Point X.

In summary, the Hutt City drainage system at Point X, is receiving rainfall from these sources:

- Ngaio Street via drainage underneath the Karamu/Ngaio Walkway.
- The west end of Karamu Street
 - which is receiving water run-off from Muritai Road gutters.
- The east end of Karamu Street
 - which is receiving run-off from both sides of Oroua St close to Karamu St.
- The east side of the large carpark, run-off from which travels east down Karamu St to Point X.

Flow from Point X to the sea

- The underground drain from the lowest point of Karamu St – Point X – carries drainage water to the sea.
- Observation, which Hutt City plans, and surveyed levels should be able to confirm, show that the vertical fall from Point X to sea level at the beach – at low and high tide - is very slight.
- This slight fall must make the passage of rainfall through the pipeline from Point X to the sea slow – especially if the drainage system is partially blocked by leaves and other material – as is evident in the above Photos Nos. 1 to 10.
- It appears from observation by residents over recent years that the outfall to the sea is itself a problem.

Photo 14

This photo shows the outfall on 18 March 2025

Photo 15

This photo shows the outfall on 30 March 2025, from the opposite direction to Photo 14

- Logs and other timber debris can be seen to be lying below the outfall – a consequence of Hutt City’s policy in recent years of not clearing logs and timber which come down the Hutt River in heavy rainfall events, enter the harbour and lodge on the Robinson Bay beach, there to remain. The quality of the beach for use by Eastbourne residents and visitors deteriorates accordingly.
- The quantity of such debris lying below the drainage outfall changes frequently, depending upon wind, sea swells from the south, and tides, however some debris is always present. The importance of this is not that water cannot find its way past logs, but because the logs cause wind eddies that assist beach sand to more quickly fill up the channel below the outfall.
- From time-to-time Hutt City arranges for machinery to clear out sand from the channel, heaping that sand on each side of the channel.
- This clearance is costly and is adequate for a brief time. However, the heaped sand is soon blown by wind back into the channel, resulting in a further cycle and waste of the money that was spent.
- This problem might be solved by spreading excavated sand more widely and thinly over the beach north and south of the channel, such that the height of the moved sand is markedly less and so presents less of a face for the winds to bear upon.

Further, this sand could then be planted with indigenous coastal plants to retain the sand in place.

- There would be a cost for this additional work, however this might be more than offset by financial savings from not having to do the work so often.

Suggestion

Hutt City excavates sand from the beach channel below the Karamu Street drain system and heaps it on each side of the channel. However, heaped sand is soon blown by wind back into the channel, resulting in a further cycle and waste of the money that was spent. If Hutt City was to spread excavated sand more thinly over the beach north and south of the channel shown in photos 14 and 15 above and its engineers to observe the results closely thereafter, a lower cost and more satisfactory solution might be found.

Question 3

Will Hutt City (i) test an improvement by spreading the excavated sand more thinly along the beach - for some months to allow for different seasonal conditions - such that the height of the moved sand is markedly less and so presents less of a face for the winds to bear upon and plant with indigenous coastal plants to stabilise the sand. Further, (ii) advise local residents of the outcome of its test?

Call to Action

Will Hutt City spread the excavated sand more thinly along the beach and provide native planting applicable for sand dunes to assist stabilisation of the dunes? In addition, advise local residents of the outcome of its test.

m) Infrastructure Flood Proofing

Photo 16 below shows an engineering work at the end of Heketara Street close to the sea wall. Local residents have been told that underneath the surface works lies a large tank / tankage system, whereby drainage challenges are remedied. Hutt City engineers will be familiar with the system and able to advise whether it might be applicable to the drainage outlet below Karamu Street, discussed below.

Photo 16 Taken on 18 March 2025



If a similar large stormwater retention tank was built sub-surface in the car park at the end of Karamu Street to address the current flooding issues, and equipped with appropriate valving, it could serve a second worthwhile purpose. It would provide the community with an emergency water source, if local water supply was cut off and tank water could not be trucked into Eastbourne during a force majeure type event.

Note: The water would not be drinkable, so would require treatment for safe human consumption.

Suggestion

As advised above Hutt City has installed an engineering work at the end of Heketara Street, (Eastbourne) close to the sea wall. Local residents have been told that underneath the surface work lies a large tank / tankage system, whereby drainage challenges are remedied. There is ample room on the large carpark at the seaward end of Karamu Street, for a similar retention tank system to be installed.

This idea of retaining a large quantity of water in a tank, to serve a second worthwhile purpose, would benefit both Hutt City and local residents, at relatively little additional construction cost.

Question 4

Will Hutt City (i) investigate engineering work similar to that at the end of Heketara Street and (ii) advise residents of the outcome of its investigation?

Call to Action

It is a good idea for inclusion in the current District Plan as this gives hope to residents that their voices are heard and that a long running issue will be addressed.

n) Decadal Shoreline Stability in Eastbourne, Wellington Harbour

The following information is drawn from a very high-quality MSc thesis by David Olson. Completed in 2010 at Victoria University it has recently (2023) been posted online to provide free access for the public.

[https://openaccess.wgtn.ac.nz/articles/thesis/Decadal Shoreline Stability in Eastbourne Wellington Harbour/16974082?file=31398385](https://openaccess.wgtn.ac.nz/articles/thesis/Decadal_Shoreline_Stability_in_Eastbourne_Wellington_Harbour/16974082?file=31398385)

The thesis is comprehensive; draws on prior published literature, historical and more recent data collected by Olson's fieldwork and analysis of aerial photography. It repays careful reading. One of its foci, detailed in thesis Chapters 5 and 6, is tracking the beach progradation caused by the northward moving gravel front which, by 2010, had reached the southern part of Days Bay, ~20 km north of its Orongorongo sediment source.

This gravel front is very evident along the length of Robinson Bay. In this regard Olson writes, quote:

Page 44

"Recently, the gravel front has rendered the (Robinson Bay) sea wall redundant, and the metal groynes have been removed as a safety measure, as only the tips were protruding from the gravel, creating a hazard for walkers."

Page 90

"Eastbourne beach between Windy Point and Burdans Gate has increased in area from approximately 100,000m² in 1941 to 200,000m² (in 2008), and the measured Pencarrow shoreline has also doubled in area between 1941 and 2001."

Page 91

"Northern Robinson Bay maintains backbeach zones of sand size sediment with sporadic grassed dunes to the north of the Recreation Ground. South of the Recreation Ground, backbeach and foreshore sediment is dominated by gravel. Pockets of sand appear mostly on the low tide terrace, with the remainder of the beach alternating between pebble and granule sized clasts."

Page 94

"The most significant shoreline width changes have occurred in Robinson Bay (Fig 5.14), where there has again been a net increase in beach width of up to 60m through the Recreation Ground area and up to 120m through the southern prograding section at Miro Street. Width remained low through the southern part until 1985, when beach width increased dramatically from 20 to 100m. The northern progradation has generally shown increased width, but with reduction shown in the period from 1969."

Page 123

"**The most significant finding** to come out of this study relates to whether the change currently observed along Eastbourne's shoreline is a short term beach adjustment to a gravel pulse, or a more permanent adjustment

relating to longer term changes in supply and/or transport processes. The temporal results of this research **have indicated a more permanent change** to the morphology and sedimentology of this coastline. The historical aerial photographs analysed have shown significant net progradation over 67 years between the Orongorongo River in Pencarrow and Days Bay 20km to the north, with smaller annual erosion/accretion cycles superimposed on the longer term decadal shoreline advance.”

Page 129

“Given the extent of coastal erosion experienced in Eastbourne throughout much of the 20th Century, **from a coastal management perspective, the accumulation of gravel along the beachface is a positive outcome.** It has provided a natural buffer to erosion as the beach is prograding, reducing wave inundation distances and rendering some of the hard engineering mitigation structures redundant, including the removal of the metal groyne system in recent years.”

The bolding of text above in the two above paragraphs is by this submitter, not Olson.

Visual inspection in March 2025, 15 years after Olson’s work, lacks his carefully measured precision, however, indicates that the prograding accumulation of gravel along the coastline beachfront from Burdan’s Gate northward has continued.

Based on the above observation and Olson’s findings that the prograding accumulation of gravel along the coastline beachfront from Burdan’s Gate northward is beneficial, it seems clear that prograded gravel accumulation should be considered in respect to the risk of coastal inundation – presently assessed in the Property Report for 10 Ngaio St (Page 1 above) to be Medium Risk - when formulating the Lower Hutt’s Proposed District Plan.

Questions

Six questions are asked below in respect to the beneficial prograding accumulation of gravel along the coastline beachfront from Burdan’s Gate northward, highlighted by David Olson. The question numbering follows the sequence established above.

Question 5

Is Hutt City aware of David Olson’s work regarding prograding accumulation of gravel?

Question 6

Does Hutt City have objective data on the prograding accumulation of gravel after Olson’s work, i.e. since 2010?

Question 7

Has Hutt City considered Olson’s work and the significant beneficial effects of gravel progradation in formulating the Lower Hutt Proposed District Plan?

Question 8

If the answer to Question 6 is yes, has the Medium Risk rating for coastal inundation been amended where gravel progradation is evident?

Question 9

If the Medium Risk rating for coastal inundation has been amended, how?

Question 10

If the Medium Risk rating for coastal inundation has not been amended, will Hutt City (i) review Olson's work, and the ongoing prograding accumulation of gravel in the 15 years since 2010 and (ii) advise residents of Eastbourne and the eastern harbour bays the outcome of its review?

14. Homeowners could be advised to take useful action

Five examples:

- Clean street gutters and drainage gratings. As explained above, some homeowners in Ngaio Street have been doing this for years. While legally it is the responsibility of Hutt City under the RMA and LGA, we have been happy to help as (i) the job is not being done by Hutt City, and (ii) as local residents and stakeholders, we want to contribute to the preservation and enhancement of our locality.
- Avoid parking vehicles with their tyres in the gutter, thereby avoiding the risk of tyres impeding water flow in the gutter.
- Keep gardens and trees in good condition, weeding and trimming as necessary, with disposal of green material to one or all of: (i) a home compost bin – most of us keen gardeners have one, (ii) the local Lions Club last-Saturday-of-the-month bin sited after the Bus Barns, and (iii) through the excellent once-a-month Hutt City green recycling bin for organic and compostable vegetative material.
- Minimise hard and impermeable concrete or asphalt paving or, if present, ensure that water drains off it to lawn, garden or wood chip material, all of which are permeable, allowing water to infiltrate through the soil horizon.
- Raise the level of one's house. One submitter's home at 10 Ngaio Street sits on concrete piles, making the under-floor joists a useful ~800 mm above ground level. This submitter notes that his immediate back neighbour's house at 9 Karamu Street is also raised. This is a small sample size of only two, however it is likely that there are more elevated homes elsewhere in Eastbourne and the eastern harbour bays.

It is recommended that Hutt City recognises the contributions that homeowners can and do to make and does not penalise them through a blanket approach, as it appears from Hutt City's early March 2025 letter to homeowners, may be intended.

Questions

Four questions are asked below in respect to the elevation of homes above ground level that is discussed immediately above. The question numbering follows the sequence established earlier.

Question 11

Does Hutt City agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding?

Question 12

If Hutt City does not agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding, why not?

Question 13

If Hutt City does agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding, will Hutt City (i) obtain relevant information for all homes effected by the Proposed District Plan, and (ii) advise those homeowners with elevated homes of their reduction in risk?

Question 14

If Hutt City will not obtain the information requested in Question 13 above regarding homes raised above ground level to reduce the hazard to that home from coastal inundation and flooding, why not?

15. Hutt City communication with homeowners and ratepayers

The Proposed Lower Hutt District Plan ("Plan") is available online here:

<https://eplan.huttcity.govt.nz/review/rules/0/36/0/0/0/46>

The Plan is an extremely large, complicated, formidable, hard to penetrate, off-putting and difficult to understand document.

It would be extraordinary if all homeowners affected by the Plan were able to read and understand it.

This submitter with a home in Ngaio Street, Eastbourne who has the benefit of education and facility with the written English language, has spent four hours online attempting to find, read and understand the most pertinent information. He has failed.

Recourse by homeowners to a legal or other suitably experienced and knowledgeable expert by homeowners to help them is, in theory, a possibility. However, (i) the cost would far exceed the financial resources of the great majority of homeowners in Hutt City and (ii) placing that burden on individual homeowners is the antithesis of open and inclusive democracy.

Desire to read and understand the Plan, but being unable to do so in the Plan's present format, seems much more likely to make homeowners resent and oppose the Plan than

to accept and support it.

Question 15

Will Hutt City provide homeowners with a readily understood explanation of the Proposed Lower Hutt District Plan?

Question 16

If Hutt City will not provide homeowners with a readily understood explanation of the Proposed Lower Hutt District Plan not, why not?

At:

Section No. 10 above (Local Government Act 2002) (LGA)
50. Additional information to be included in an annual plan

The text reads, quote:

- “(1) For the purposes of [clause 49\(1\)\(g\)](#), an authority’s annual plan must, in relation to each group of activities of the authority,—
- (a) identify the activities within the group of activities:
 - (b) identify the rationale for delivery of the group of activities (including the community outcomes to which the group of activities primarily contributes):
 - (c) **outline any significant negative effects that any activity within the group of activities may have on the social, economic, environmental, or cultural well-being of the local community:**
- (2) For the purpose of subclause (1), each of the following activities is a group of activities:
- (c) stormwater drainage:
 - (d) flood protection and control works:

Bolding of text immediately above has been made by this submitter.

Question 17

Does Hutt City’s annual plan meet the legislative requirement of the Local Government Act 2002 by outlining any significant negative effects that any activity within the group of activities, (including the community outcomes to which the group of activities primarily contributes), may have on the social, economic, environmental, or cultural well-being of the local community?

Question 18

If the answer to Question 17 is yes, (i) where can homeowners find that information, and (ii) will Hutt City advise all homeowners of this location?

Question 19

Does (i) Hutt City have information on any significant negative effects of:

- a. its annual plan, and
- b. the Proposed Lower Hutt’s District Plan
- c. Especially, impacts of notices recorded regarding Land Information Memorandum (LIM) Reports for homeowner’s properties in the subject areas?

And (ii) will Hutt City provide this information to homeowners?

Question 20

If Hutt City will not provide the information sought in Question 19, why not?

16. What happens next?**Question 21**

What process and timetable, will Hutt City be following, after receipt of homeowner's submissions?

Question 22

What will Hutt City's conclusion be if there are relatively few submissions to Hutt City in response to its early March 2025 letter to homeowners?

- a. i.e. materially less than the total number of homes impacted by Lower Hutt's Proposed District Plan

17. An assumption that Hutt City would be wrong to make

It would have been helpful and democratic if pertinent information had been provided to all those who received the early March 2025 letter that has resulted in this submission. The task of responding to the Hutt City letter by residents living in Ngaio and Karamu Streets, has taken considerable time, work and has seriously and negatively impacted on their family and community responsibilities.

In addition, this task has been aggravated by the very short time between receipt of the letter from Hutt City and the submission deadline of 5 pm on 4 April 2025; and, at least for this submitter, the later extension of the deadline is too late for him.

Hutt City should not assume that few submissions mean people are not interested. Discussion with Eastbourne residents and neighbours strongly indicates that many are seriously worried, would like to submit, however have simply been unable to find the time. This is especially so for older people who are well beyond the age group able to easily do so, for mid-age people with children at home, and for others who are in some way disadvantaged.

Discussions in this locality reveals the high financial pressure and high stress that many people are experiencing because of decisions to which they have been given little opportunity by Hutt City to contribute. Their home values are likely to fall markedly, and home insurance might become unaffordable and, in time, unavailable. (As was advised to Eastbourne residents in a meeting held at Eastbourne Sports and Services Inc. mid-year 2022 relating to Climate Change)

What should Eastbourne people do then?

Together we face an 'all of Aotearoa New Zealand' challenge, it goes beyond Hutt City

and the Wellington harbour eastern harbour bays. Putting aside a single minded intent and purpose by a powerful entity enables the best way forward in a genuine democracy, reflecting kaitiaki and tautiaki for its people.

END

Submission re Hutt City Proposed District Plan
Additional Photographs – Taken 06 April 2025
Ngaio Street, Eastbourne
Prior to forecast heavy rain

The three photographs exemplify what I also explain by photographs and commentary in my submission. This is that residents of Ngaio Street like, I know, other residents in Eastbourne, regularly clean the gutters and drainage gratings in their street when needed.



Photo 1. One of two blocked drain gratings at end of street



Photo 2. Work in progress



Photo 3. Job complete