

RMA Form 5

# Submission on publicly notified proposed district plan

Clause 6 of Schedule 1, Resource Management Act 1991

To: Chief Executive, Hutt City Council

Via email to [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz).

1. This is a submission from Joe Jeffries on the Proposed Lower Hutt District Plan 2025.
2. My email address for service is joejeffries@gmail.com.
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, my submission on those provisions, and the decisions I seek are shown in the below table. I also seek all further, alternative, necessary, or consequential relief as may be necessary to fully achieve the relief sought in this submission.
5. I wish to be heard in support of my submission.
6. If others make a similar submission, I will consider presenting a joint case with them at the hearing.

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## Decisions Requested

#	Chapter	Provision	Position	Reasons	Relief sought
1		High Density Residential Zoning.	Support	I support retaining High Density zoning including six storey building heights in Petone including in coastal areas.	<i>Retain High zoning as notified.</i>
2	Coastal Environment	High Tsunami Hazard Overlay	Oppose	I oppose applying a “high” hazard ranking to tsunami areas based on a 1% AEP scenario inundation extent with 1m Sea Level Rise as this does not accurately reflect “high” hazard risk and is unnecessary to manage the specific hazard identified.	<p><i>Delete the High, Medium and Low categorisations for overlays and instead rename the tsunami and coastal inundation overlays around the information they are based on.</i></p> <p><i>Alternatively amend the Tsunami Hazard Overlay so that it applies to a 1% AEP scenario at today's sea level consistent with the approach to coastal inundation.</i></p>
3	Coastal Environment	CE-P8 Risk-Based Approach	Support	I support a risk-based approach to identification of coastal hazards subject to amendments to other provisions of this chapter.	<i>Retain as notified.</i>

4	Coastal Environment	CE-P14 Additions to existing buildings and structures within the Coastal Hazard Overlays	Amend	<p>Additions to existing residential buildings in High Coastal Hazard areas do not increase exposure to the hazard where they do not increase the number of people living in the dwelling. These additions also enable the ongoing use of existing buildings by enabling upgrades and improvements.</p> <p>This policy should therefore focus on ensuring the additions mitigate risk through measures such as higher floor levels rather than preventing the addition altogether.</p> <p>It is also unclear how access to evacuation routes is specifically related to an addition to an existing building.</p>	<p><i>Amend CE-P14 as follows:</i></p> <p>.....</p> <p>4. Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards <u>and activities most sensitive to natural hazards</u> in the High Coastal Hazard Overlays where:</p> <ol style="list-style-type: none"> <li>The addition enables the continued use of the existing building,</li> <li>The addition incorporates measures that reduce or do not increase the risk to people and buildings from coastal inundation from sea level rise, and</li> <li><del>There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</del></li> </ol> <p><del>5.—Only allow for additions to existing buildings and structures containing activities most sensitive to natural hazards in the High Coastal Hazard Overlays where:</del></p> <ol style="list-style-type: none"> <li><del>The addition incorporates measures that reduce or do not increase the risk to people and buildings from the coastal hazard, and</del></li> <li><del>There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</del></li> </ol>
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#	Chapter	Provision	Position	Reasons	Relief sought
5	Coastal Environment	CE-P15 Subdivision, Use and Development within the Coastal Hazard Overlays	Amend	The requested relief enables new buildings to be considered in the High Coastal Hazard area	<p><i>Delete clause 9 and amend clause 8 of CE-P15 so that it also applies to the High Coastal Hazard Overlay as follows:</i></p> <p>8. Only allow for new buildings and structures, building platforms and the conversion of existing buildings containing activities most sensitive to natural hazards in the Medium <u>and High</u> Coastal Hazard Overlays in all other zones where:</p> <ul style="list-style-type: none"> <li>a. The new building incorporates measures that minimise the risk to people and buildings from the coastal hazard,</li> <li>b. The new development does not involve or require the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard, and</li> <li>c. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</li> </ul>

6	Coastal Environment	CE-R12 Additions to existing buildings and structures for activities most sensitive to natural hazards in the High Coastal Hazard Overlays	Oppose	<p>I am opposed to the Discretionary activity status for additions to buildings.</p> <p>Additions to existing residential buildings in High Coastal Hazard areas do not increase exposure to the hazard where they do not increase the number of people living in the dwelling. These additions also enable the ongoing use of existing buildings by enabling upgrades and improvements.</p> <p>This rule should therefore be enabling of additions which mitigate risk through measures such as higher floor levels rather than preventing the addition altogether.</p> <p>A RD activity status for additions is also consistent with the approach in other comparable cities such</p>	Amend the Discretionary activity status in CE-R12 to Restricted Discretionary.
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#	Chapter	Provision	Position	Reasons	Relief sought
				as in the Wellington City District Plan.	
7	Coastal Environment	CE-R16 New buildings and structures and the conversion of existing buildings for activities most sensitive to natural hazards in the Coastal Hazard Overlays	Amend		<i>Amend the activity status for new buildings in High Hazard areas under CE-R16 from NC to RD.</i>
8	Natural Hazards	High Flood Hazard Overlay	Oppose	I oppose applying a 'high' hazard ranking based on a 1.59m sea level rise as this does not accurately reflect a high risk based on probability today.	<i>Delete the High, Medium and Low categorisations for overlays and instead rename the natural hazard overlays around the information they are based on.</i>  <i>Alternatively amend the High Hazard Ranking for stream corridors so that it applies to a 1% AEP scenario at today's sea level.</i>