

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.

- ☐ This is a submission from RK & LM Bromley. 4 Lemonwood Grove. Maungaraki. Lower Hutt 5010. on the Proposed Lower Hutt District Plan 2025.
- ☐ My email address for service is l.k.bromley@xtra.co.nz
- ☐ I could not gain an advantage in trade competition through this submission.
- ☐ 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.
- ☐ I do not wish to be heard in support of my submission.
- ☐ If others make a similar submission, I will not consider presenting a joint case with them at the hearing.

Introduction

- ☐ I live in Maungaraki and am concerned about the introduction of the Slope Assessment Overlay.
- ☐ This desk analysis which affects a significant number of individual properties has no geotechnical survey foundation.
- ☐ The WSP report differentiates between Very Low, Low, Moderate, High and Very High slope failure susceptibility, however the District Plan slope assessment overlay does not. It is my view the publicly available map is therefore potentially very misleading. This could have a seriously detrimental effect on property values and insurance premiums (similar to flood hazard zonings).
- ☐ I believe there should be specific instruction in the District Plan wording that the slope assessment overlay is not provided for the purpose of property valuations or the setting or reviewing of insurance premiums.

Decisions Requested

#	Chapter	Provision	Position	Reasons	Relief sought
1	Part 2 NH - Natural Hazards	Slope Assessment Overlay NH-P12	Limited support with amendment	<p>It is clear this is a desk analysis and, although based on reasonably recent data and possibly reasonably useful, has no geotechnical survey foundation. In spite of this the general conclusions and mapping affects a significant number of individual properties even though it's not specific to any property.</p> <p>RMA and District Plan policies and rules already require individual property owners or developers to get specific geotechnical advice prior to any building or development approval, so the Slope Assessment Overlay inclusion in the district plan appears to be a duplication of existing policy and rules. It could be available as a hazard mapping resource without being included in the District Plan.</p> <p>The WSP report differentiates between Very Low, Low, Moderate, High and Very High</p>	<p>If the Slope Assessment Overlay is to be included in the District Plan I believe:</p> <ol style="list-style-type: none"> 1. The Slope Assessment Overlay mapping should differentiate between moderate and high slope failure susceptibility. 2. There should be specific instruction in the District Plan wording that the Slope Assessment Overlay is <u>not</u> provided for the purpose of property valuations or setting or reviewing of insurance premiums.

			<p>slope failure susceptibility. However the District Plan slope assessment overlay does not have this differentiation. All marked slope assessment areas could be interpreted as being of high risk of slope failure - clearly not an accurate or fair result.</p> <p>The District Plan states that the Slope Assessment Overlay is to assist with planning for building and property development planning and consents. However the RMA and District Plan already requires consents to be applied for and approved for building and property development, so although the Slope Assessment Overlay is included in Policy, there are no Rules associated with the overlay. When combined with the lack of slope differentiation mentioned above, it appears the overlay is to <u>inform</u> land use planning, urban growth strategies and plan change proposals only (as recommended by WSP), and this may not be sufficiently clear in the District Plan.</p> <p>It is my view the publicly available map is therefore potentially very misleading. This could have an</p>	
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				unintended but seriously detrimental affect on property values and insurance premiums (similar to flood hazard zonings).	