

To: Chief Executive, Hutt City Council

Via email to district.plan@huttcity.govt.nz.

1. This is a submission from Survey + Spatial New Zealand, Wellington Branch c/- David Gibson on the Proposed Lower Hutt District Plan 2025.
2. My email address for service is: nzisplanning.wgtn@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.
7. Decision Requested – see attached table.
8. My submission and reasons – see attached table.

Signature of person making submission.


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Date 2 / 05 / 2025

D Gibson

On behalf of Survey + Spatial NZ, Wellington Branch

Lower Hutt City Proposed District Plan – multiple submission points table

Submitter Name: Survey & Spatial New Zealand Wellington Branch

Please add a new row for every specific and unique point you would like to submit on.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
THREE WATERS				
	THW-R1	Oppose	<p>This rule makes the Regional Standard for Water Services 2021 (RSWS) a permitted standard. The RSWS is not written in a manner that is appropriate to be applied as a permitted standard under the District Plan.</p> <p>The rule is a copy of the Wellington City Council Three Waters rule. Our experience with the WCC District Plan is that the rule and use of the RSWS is not working. Hence WCC are proposing a plan change in the near future to amend the Three Waters provisions and the Subdivision provisions.</p> <p>We note that any future changes of the RSWS would not be incorporated into the District Plan until a plan change or variation proposal has been completed.</p>	Remove cross references to the RSWS and specify the minimum requirements for new connections.
	THW-R2	Oppose	<p>This rule permits 1-3 units provided hydraulic neutrality is incorporated using the pre-approved solutions from Wellington Water's document "Managing Stormwater Runoff".</p> <p>The Managing Stormwater Runoff document only provides a limited number of approved solutions.</p> <p>However, there are other options to achieve hydraulic neutrality. The permitted standard should not be limited to the pre-approved detention systems.</p>	<p>Amend as follows:</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. It involves the construction of 1-3 residential units:</p> <p style="padding-left: 40px;">i. A Wellington Water Limited approved solution for managing volume and rate of stormwater runoff is installed as part of the development;</p> <p>b. For development of four or more residential unit, a retirement village, or a non-residential building:</p> <p style="padding-left: 40px;">i. Stormwater management measures are incorporated which achieve post development peak stormwater flows which are the same or less than the modelled peak flows for the site before commencement of the development.</p>

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	THW-R3	Oppose	<p>The incorporation of water sensitive design is not required for developments involving up to 3 houses.</p> <p>However, this rule appears to make all multi-unit developments a restricted discretionary activity in order for Council to require water sensitive design for the multi-unit development.</p> <p>The difficulty with the rules is the requirement to use the Wellington Water Limited's Water Sensitive Design for Stormwater: Treatment Device Design Guideline December 2019. This document is aimed at larger greenfield subdivision developments and is not suitable for infill multi-unit developments.</p>	<p>Amend the matters of discretion as follows:</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> The relevant sections of the Wellington Water Regional Standard for Water Services, v3.0, December 2021 and Wellington Water Limited's Water Sensitive Design for Stormwater: Treatment Device Design Guideline December 2019; The relevant matters in THW-P4: Water sensitive design; The design, location, efficiency and effectiveness of water sensitive design methods; The ownership, maintenance and operation arrangements for the water sensitive design methods from the site; The inclusion of stormwater retention to reduce, as far as reasonably practicable, the increase in stormwater runoff volume post development; Any site constraints that may prevent water sensitive design methods from being constructed on the site; Any wider public water sensitive design treatment devices that the stormwater from the site may discharge into, thereby providing treatment prior to discharging into a water body.

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SUBDIVISION				
	SUB-S4	Oppose	As per our submissions points on the Three Waters chapter, we prefer that the specific requirements are transferred to the District Plan, rather than incorporated by reference.	Amend SUB-S4.1a to remove the cross references to RSWS and specify the maximum and minimum water pressure requirements for the point of supply.
	SUB-S5	Oppose	<p>As per our submissions points on the Three Waters chapter, we prefer that the specific requirements are rationalised and transferred to the District Plan, rather than a whole section of the RSWS incorporated by reference.</p> <p>Many of the 'level of service' items listed in the RSWS are not appropriate to be standards for a District Plan.</p>	Remove cross references to the RSWS and specify the minimum requirements for a wastewater connection.
	SUB-S6	Oppose	<p>As per our submissions points on the Three Waters chapter, we prefer that the specific requirements are rationalised and transferred to the District Plan, rather than a whole section or Table of the RSWS incorporated by reference.</p> <p>Table 4.1 of the RSWS provides a design level of service of the 10% AEP. However, Tables 4.2 & 4.3 evaluate floor levels and the flood depths/flows in public areas, and are not relevant to the provision of a stormwater connection for a lot.</p>	Remove cross references to the RSWS and specify the minimum requirements for a stormwater connection.