

RMA Form 5

Submission on publicly notified proposed district plan

Clause 6 of Schedule 1, Resource Management Act 1991

Privacy Statement

Your submission must include your name, and an address for service (preferably email, but you can use a postal address). All information you include in this submission, including your name and address for service, will be provided to other submitters and published on Hutt City Council's website. Paper copies may also be made available. Hutt City Council is required to collect and publish this information to carry out its functions under the Resource Management Act 1991 and to enable others to take part in the district plan process. The Council, other submitters, and the Environment Court may need to contact you during this process.

If your submission does not include your name and an address for service, it will be rejected.

While the Council will retain all information provided in your submission in secure council systems, all contact details will be removed from any documents published on Council's website once the district plan process is complete. However, your name and the contents of your submission will still appear in these documents.

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To: Chief Executive, Hutt City Council

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

1. This is a submission from **Jacob McInteer** on the Proposed Lower Hutt District Plan 2025.
2. My email address for service is **mcinteerj@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 do not seek 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.

Introduction

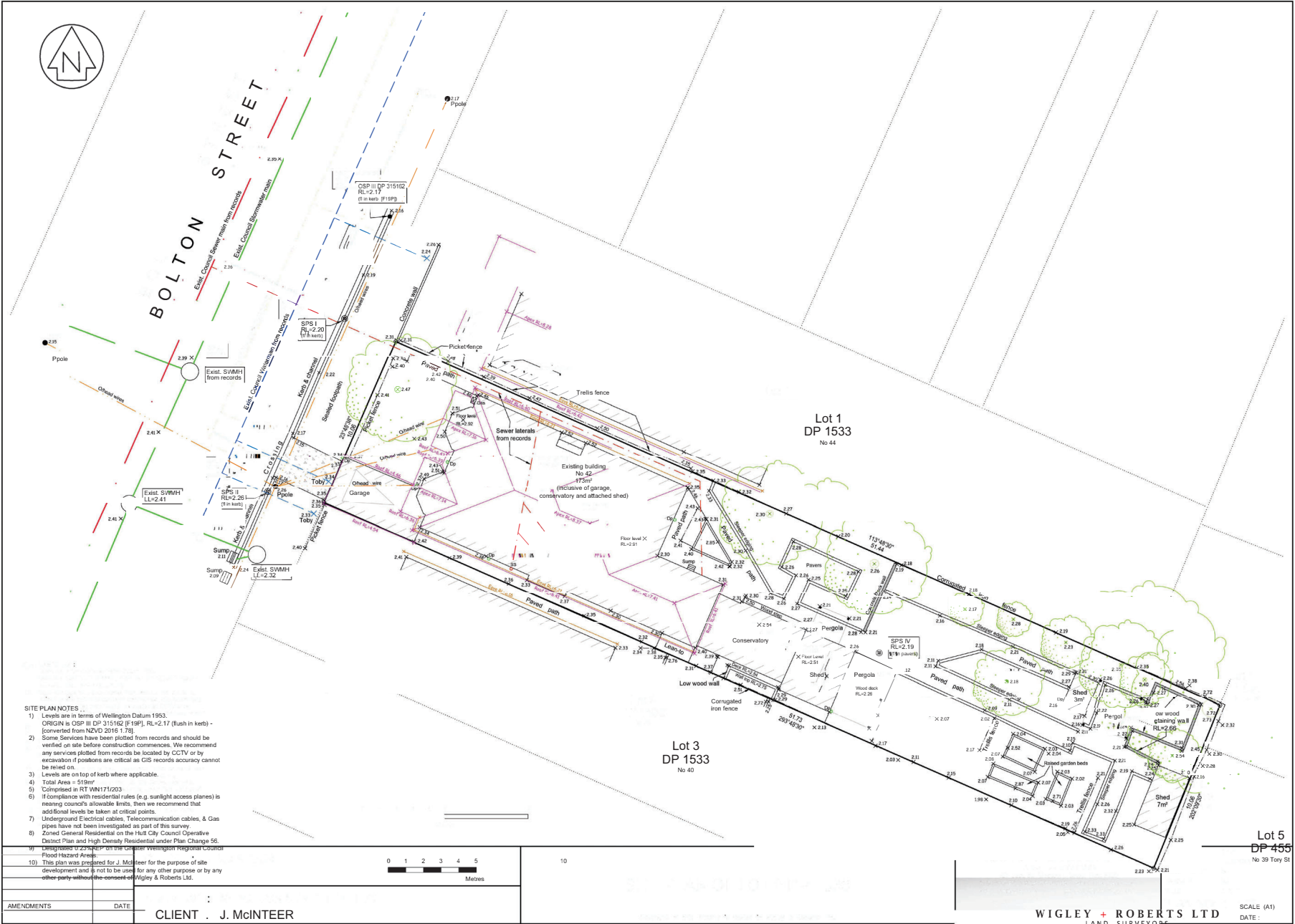
7. I am an owner of 42 Bolton Street in Petone. Our home is a character villa built in the 1910s, which we have recently restored and partially renovated.
8. My property has been identified as being with a 'high natural hazard area' in the proposed district plan. Specifically due to *part* of my property falling within the 'High Flood Hazard' overlay.
9. I am supportive of the idea of climate change adaptation and managed retreat, which are particularly important considerations in areas such as Petone as well as areas adjacent to the Hutt River.
10. While the proposed district plan does reduce and avoid risk in high risk areas, it does little to encourage the management of risk for existing dwellings.
11. In fact, given the reduction in land values that are likely to result from 'high risk' classifications as well as the increased burden to have alterations approved, it is likely the property owners will have less money available or be otherwise less willing to invest in climate resilience measures.
12. I believe that council's planning, as expressed through the Proposed District Plan, should:
 - a. Be more sensitive to site specific considerations (where data is available) as opposed to broader modelling.
 - b. Encourage & incentivise property owners to invest in climate adaptation measures.
 - c. Be aware of the impact decreased property values (due to risk classifications) will have on property owners' decisions to invest in climate protections. In simple terms: the idea that somewhat arbitrary risk classifications will reduce property values which in turn disincentivises investment in measures which may provide more climate resilience.

Decisions Requested

#	Chapter	Provision	Position	Reasons	Relief sought
1	Maps	42 Bolton Street, Petone - Hazard Zoning	Oppose in part	<p>The proposed DP map show 42 Bolton Street to be in the following zones:</p> <ul style="list-style-type: none"> • High Density Residential Zone • Medium Coastal Inundation Hazard • High Flood Hazard • Liquefaction Hazard • Medium Tsunami Hazard • Coastal Environment <p>Most of these hazards appear appropriate based on the information available, and I am supportive of those aspects.</p> <p>However, the 'High Flood Hazard' classification and overlay shown on the maps does not align to ground levels on the site.</p> <p>Specifically, the survey (attached) was completed in July 2023 and shows the property is largely flat/level.</p>	<ol style="list-style-type: none"> 1. Remove the 'High Flood Hazard' classification from 42 Bolton Street, with the entire property instead being classified as 'Medium Flood Hazard'. 2. Site specific investigations (surveying of ground levels) should be undertaken to determine the actual ground level of adjacent properties and the suitability of the 'High Flood Hazard' classification, including the following sites: <ol style="list-style-type: none"> a. 34, 36, 38, 40, 44 & 46 Bolton Street b. 22, 24, 26, 28, 35, 37, 39 & 41 Tory Street c. 328A-B, 330-334, 336-338, 340-342, 350 & 352 Jackson Street d. 3 & 5 Adelaide Street
2	Maps	42 Bolton Street, Petone - Partial Hazard Zoning	Oppose in part	<p>I support the use of the Natural Hazard overlays to manage risks such as flooding, however the proposed district plan appears to label entire properties with hazard levels which only affect parts of those properties.</p>	<p>Where properties are partially impacted by risk overlays, the council's records should indicate them as such.</p> <p>In the case of 42 Bolton Street, if it falls partially in the "High Flood Hazard" overlay, it</p>

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				<p>For 42 Bolton Street, only the back half of the property is in the “High Flood Hazard” area, with the front half being “Medium Flood Hazard”. The house is on the front half and entirely within the “Medium Flood Hazard”.</p> <p>When we come to sell the property one day, buyers will be discouraged by the “High Flood Hazard” label, despite this only impacting the garden rather than the dwelling. This will reduce the value of the property.</p> <p>We undertook renovations in 2024 which included investing in stormwater detention tanks in order to provide better climate resilience to the types of risk the proposed district plan seeks to address (CCSD-02, NH-01, NH-04).</p> <p>Because of the reduction in value caused by the “High Flood Hazard”, I would not make a similar decision in future - as the economics were tight, and it makes less sense to invest in protections for lower value assets.</p> <p>Extrapolating this dynamic across the affected areas, the blanket application of the hazard overlays to entire properties in the proposed district plan will reduce</p>	should be designated “High Flood Hazard - Partial” in council records and LIM reports.

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				future investment in climate adaptation & resilience and thus fail to achieve NH-01 and NH-04 or align with CCSD-02.	
3	NH - Natural Hazards	Whole Chapter	support in part	<p>The district plan focuses on the management of future development, but pays little head to supporting or encouraging investment in resilience for existing dwellings.</p> <p>People who own properties designated as 'High X Hazard' have little incentive to invest in climate resilience and adaptation measures.</p> <p>Not only will reduced property values weigh on investment, but in many cases owners will need to pay extra for resource consent in order to get approval to improve the resilience of their land and buildings for activities that currently only require building consent.</p> <p>In this regard, the proposed district plan has over-indexed on restricting/avoiding development at the expense of encouraging the reduction of risk to existing buildings (and people) and thus fails to achieve NH-01 and NH-04.</p>	<p>The district plan should allow for an additional classification of properties which demonstrates whether the property has built protections that may alter the underlying land risk as it relates to the buildings and people on the site.</p> <p>Similar to earthquake preparedness (where we talk about % adherence to the NBS), the council should establish a similar measurement which speaks to flooding resilience and factors in things like pile/floor heights, location of buildings in relation to risk areas, and stormwater management systems.</p> <p>This would ensure property values better reflected the risk associated with the buildings and people that reside on a given site, rather than solely the risk of the underlying site.</p> <p>Alternatively the council could provide other incentives for encouraging investment in climate resilience such as waiving resource consent fees or temporary rate reductions to offset the cost.</p>



SITE PLAN OF LOT 2 DP 1533

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SCALE (A1) 1:100
DATE: JULY 2023
SURVEYED BY: ML
DRAWN BY: RJ
SHEET: 1 OF 1
PLAN NO: 11,123
REV: 0