

From: [David Surrey](#)
To: [District Plan Review Team](#)
Subject: Re: [EXTERNAL] Submission
Date: Friday, 2 May 2025 3:42:45 pm
Attachments: [noname](#)

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Hi

Thank you for this. My full name is David Surrey and this is the correct email address to contact me on. I do wish to be heard and i would consider working with others who may have raised similar points.

Thanks

David.

On Fri, May 2, 2025 at 3:31 PM District Plan Review Team
<district.plan@huttcity.govt.nz> wrote:

Hello David

Thank you for your submission on the Proposed Lower Hutt District Plan.

Your submission has been accepted and given the reference number PDP/427.

In order to process your submission further, can you please provide the following information:

- Confirm your full name for the submission
- Confirm whether davidsurrey66@gmail.com is your preferred email address for service
- Advise whether you wish to be heard in support of your submission
- If others make a similar submission, whether or not you would consider presenting a joint case with them at the hearing.

Kind regards,

Peter

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt

P: 04 570 6666 M: W: www.huttcity.govt.nz



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From: David Surrey <davidsurrey66@gmail.com>

Sent: Friday, 2 May 2025 2:38 PM

To: District Plan Review Team <district.plan@huttcity.govt.nz>

Subject: [EXTERNAL] Submission

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Hi

Please see below my submission on the Hutt City District Plan. I would like to be able to speak to my submission. I have read the submission form and i do not get any trade benefit from this, I am a resident of the Hutt Valley. The submission is quite long and I am happy to explain any of it. I have had some help from someone in Auckland with this submission so hopefully it makes sense as it is all a bit beyond me but i am in a number of hazard overlays as i am in Petone and i feel the provisions need some work as well as for a property i own in Wainuiomata. Any questions can be emailed to me here.

Submission

1. There are some areas in mapping where highly fragmented properties have been mapped as Mixed Use. Reality is that their ownership structure will never

allow for these activities to occur and they are better mapped as residential as this reflects their actual use. These properties are at: 128A - 128D Randwick Road, 115a - 119E High Street and 1 - 53 McGrath Way, 564/1 - 564/9 High Street, 682A - 682E, 684 and 686 High Street. Remove the zoning from the driveways of 701A - 701D High Street.

2. I oppose the reserves contributions increasing. The Council already makes development expensive through the development contributions policy. There should be further consideration as to whether a 40% increase in this fee is appropriate.

3. I support the reduction of the minimum lot size to 1 hectare in the Rural Lifestyle Zone. I would like the relief to allow for smaller lots - 0.5 hectares. This is to ensure there is efficient use of this resource as 1 hectare lots are a bit of an undesirable size, whereas 0.5 hectare lots are big enough for effluent disposal and provides rural lifestyle living, without being so large they are undesirable or too much work for future occupants.

4. Review the sea level rise assumptions that are used in the flood models and the coastal inundation model. The RCP used is considered to be unlikely to occur by the IPCC and therefore a more realistic RCP scenario needs to be used. This should reduce the area impacted by hazards to a more realistic situation.

5. The IPI for the Hutt Valley introduced new objectives and policies for the residential zones. For some reason this plan review is seeking to change these. I am of the view the existing operative objectives and policies of the District Plan should remain and the modified provisions should not be used. Unless there is evidence to support their change due to undesirable outcomes, then these existing provisions should remain as they are clearer than the proposed provisions.

6. The minimum lot size in the General Rural Zone is too large and it is unclear what this lot size is trying to protect. It would be better if the minimum lot size was reduced to either 5 to 10 hectares. Many of the rural properties cannot be used for meaningful farming activities due to their poor soils and often steep terrain. A reduced minimum lot size allows for more flexible use of these properties and allows for some subdivision, while also ensuring that the rural character of the rural area is maintained.

7. Rural Industry are restricted discretionary activities. This is fine, but the matters of discretion should be expanded to include hours of operation, number of traffic movements, and visual amenity impacts to ensure a more holistic consideration of the impacts of these activities can occur.

8. The General Rural Policy 2 should be completely rewritten to provide a description of the effects from activities that are potentially compatible with the rural environment, instead of listing the activities. The reason for this is because some of the activities listed are not supported through the rule frameworks and therefore there is a disconnect with the policy and the rules. A policy describing the traits of activities that are compatible would be more helpful and provide more considered assessment of a range of activities. Such matters could include: maintain the rural character of the local area, have low traffic volumes, do not require intensive infrastructure, are small in size, support the well-being of the local community etc.....

9. The Rural Lifestyle Policy P2 has the same issues as the General Rural Policy and should also have description of the traits that are compatible as opposed to identifying activities. This policy could use similar traits as what is described above.

10. The matters of discretion pertaining to not meeting the maximum number of dwellings on a site in the Rural Lifestyle Zone are too brief and do not align with the policy framework. There should be further matters of discretion including, the apparent density arising from the additional residential units, the need of landscaping to mitigate any effects, and the outcomes sought under the policy framework. There may be the need to amend the policy framework to support the RD status of this consent and the additional matters of discretion, or the introduction of a new policy specifically for additional dwellings on a site.

11. The matters of discretion pertaining to not meeting the maximum number of dwellings on a site in the General Rural Zone are too brief and do not align with the policy framework. There should be further matters of discretion including, the apparent density arising from the additional residential units, the need of landscaping to mitigate any effects, and the outcomes sought under the policy framework. There may be the need to amend the policy framework to support the RD status of this consent and the additional matters of discretion, or the introduction of a new policy specifically for additional dwellings on a site.

12. The high, medium and low flood hazard overlay covers a large number of commercial properties. These buildings have accessibility requirements under the building code that need to be met and which means that floor levels are unable to be met. There needs to be the ability in the policies and rules for the floor levels to not be met in the flood hazard overlay, providing flood resistant design is used. This could be as a restricted discretionary activity, with appropriate policy support.

13. The Slope Hazard Overlay mapping needs refinement to remove small or low slopes as there are concerns around the accuracy of these maps. These maps are picking up small slopes where there is no real risk of hazards. There also needs to be a different policy and rule framework for those properties at the base of hills as opposed to those properties on hills. Potentially those at the base of hills should have a ruleframe work tied to buildings, not earthworks and possibly as a Controlled Activity to allow for works, providing there is a geotechnical report. There would need to be a new rule and policy to support this change and to recognise the difference in the Slope Hazard Overlay (if this is a thing and not an error in mapping).

14. The rules pertaining to additions to residential dwellings and non-residential dwellings in the Low, Medium and High Flood Hazard Areas need to be relaxed with more additions mader permitted. This is due to the large extent of the hazard areas and the potential for property owners to not be able to undertake any future works to their buildings as the existing rule framework makes it really hard to undertake additions dwellings. This may include changes to the policy to include the explicit consideration of flood resistant design.

15. The objectives, rules and policy wording in the coastal environment chapter

pertaining to coastal hazards and natural hazards need to align with the wording used in other District Plans being - less hazard sensitive activities, potentially hazard sensitive activities and hazard sensitive activities.

16. Rule CE-R15 and CE - R16 needs to be split into two to make it easier to understand for plan users. This split would involve the rules pertaining to the specifically identified zones being their own rule structure and those rules that relate to all zones excluding the specifically identified zones being their own rule structure.

17. There needs to be consideration to whether requiring all buildings in the Medium Coastal Hazard Overlay as needing consent as a Restricted Discretionary Activity is appropriate or whether there needs to be more of a permitted for some developments (up to two or three residential units on a site) or allowing for non-residential activities or a certain scale to be built as a permitted activity. This would also need the support of a new policy to allow for these activities.

18. The current coastal hazard framework does not have any consideration of the inundation depths. As a result, areas with 2m of coastal hazard inundation depth would be treated the same as areas with 0.1m of coastal hazard inundation depth. The hazard map overlays may be adjusted to remove inundation depths below a certain level as they will not be a level that constitutes a hazard that warrants landuse planning., I would suggest 150mm may be appropriate.

19. Introduce a policy around when risk assessments are needed to be used for the natural hazards and coastal hazards chapter. This would likely apply to high natural hazard and coastal hazard overlays and possibly medium coastal hazard overlays as well.

20. Break up the policies for natural and coastal hazards so they are easier to read. This could be done around activity type (i.e hazard sensitive, potentially hazard sensitive and less hazard sensitive activities) and the different natural hazards. This will make it easier for plan users to read.

21. This submission covers any consequential changes needed to the District Plan to ensure that the above points are achieved.

Thanks

David