

2 May 2025

Submission on the Proposed Lower Hutt District Plan, Under Clause 6 of Schedule 1 of the Resource Management Act 1991

To: the Chief Executive Officer

Hutt City Council
Private Bag 31-912
Lower Hutt 5040

Email: district.plan@huttcity.govt.nz

1. This is a submission from:

Submitter(s):

Full name: Grant & Kristin Gunn

Organisation: (as Trustees of the Gunn Family Trust)

Address: 95 Oroua Street
Eastbourne
Lower Hutt 5013

Address for service: as above

Phone: [REDACTED]

Email: grant.gunn@maycroft.co.nz

2. This is a submission on the Proposed Lower Hutt District Plan, Under Clause 6 of Schedule 1 of the Resource Management Act 1991.
3. We are directly affected by the subject matter of this submission.
4. We will not gain an advantage in trade competition through this submission.
5. We wish to be heard in support of this submission.

6. Our submission includes:

- a. Introduction
- b. Scope of the submission
- c. Specific submission points
- d. Summary of decisions required from HCC
- e. Submission Point – NH Flood Hazard overlay
- f. Submission Point – NH – Coast Inundation overlay
- g. Incentivise Homeowners to take useful action
- h. HCC communication with homeowners and ratepayers
- i. Next steps?
- j. An assumption that HCC would be wrong to make
- k. Summary

a. Introduction

We are the owners and residents of 95 Oroua Street, Eastbourne. This submission is made under Clause 6 of Schedule 1 of the Resource Management Act 1991 (RMA) regarding the Proposed Lower Hutt District Plan (PDP).

We appreciate this opportunity to submit on the Lower Hutt Proposed District Plan 2025.

We have lived in this community for several years and are committed to its ongoing vibrancy, resilience, and wellbeing.

b. Scope of Submission

We note the purpose of the Plan is to assist Hutt City Council (HCC) in carrying out its functions in order to achieve the purpose of the RMA.

We **support** the Proposed District Plan's objective of sustainably managing development and natural hazards.

However, we oppose the application of certain hazard overlays to our property where these are not supported by credible site-specific evidence and changes are sought, detailed further in this submission. The following particular provisions are not supported, and changes are sought as set out in this submission.

For context, under the Proposed District Plan we now have new and substantive impacts to our properties+ when compared to the Operative District Plan (ODP).

The submission points, questions, changes sought, alternative solutions, risk reduction solutions, can be found in this submission and within the table in Appendix 2.

c. Specific Submission Points

The specific matters of the Proposed District Plan that our submission relates to include:

1. The new High Flood Hazard Area Overlay.
2. The new Medium Coastal Inundation Hazard Area Overlay.

d. Summary of decisions required from HCC

PDP Reference	Decision sought
NH	The deletion or amendment of the Flood Hazard Overlay.
NH	The deletion of the Medium Coastal inundation overlay

We seek the following decisions from HCC:

e. Submission Point – NH Flood Hazard Overlay

Remove the new Flood Hazard Overlay from our property in the map at Appendix 1. The inclusion of our property in a High Flood Hazard Area is not supported by local evidence, and we are concerned that it has been based on overly conservative modelling rather than site-specific risk.

Our reasons:

- **Model not designed to assess coastal processes:** The Wellington Water flood model explicitly states (Section 1.1 of the report) that it “will not be required to test coastal processes.” It does not consider wave run-up, overtopping, or coastal erosion, which are critical to accurate risk assessment in a coastal community like Eastbourne.
- **Purpose of the model is infrastructure planning, not zoning:** The primary purpose of the model, as per the report, is to support stormwater infrastructure upgrade planning. It is not stated anywhere in the report that the model output is appropriate for hazard zoning under the District Plan or for property-specific classification without further site verification.
- **Model limitations preclude accurate site-specific classification:** The report (Section 3.5.4) explicitly notes that:
 - Building floor levels are not included.
 - Fences, walls, and other structures affecting water flow are not modelled.
 - Culvert dimensions are partially assumed.
 - Private drainage infrastructure, such as soak pits, are excluded. These omissions significantly limit the model’s suitability for use in determining flood risk on individual properties like ours.

These omissions significantly limit the model’s suitability for use in determining flood risk on individual properties like ours.

- **No supporting on-site verification:** There is no indication that any ground-truthing, site inspection, or detailed elevation and drainage analysis has been conducted at 95 Oroua Street. The generalised nature of the model means its outputs should not be used as the basis for hazard classification affecting private property rights.
- **Even the report recommends further verification:** In Section 5, the Wellington Water report clearly recommends that, when used for detailed work (such as design upgrades), further site-specific survey should be undertaken. By the same logic, any zoning impact based on the model must be independently verified before being applied.
- **1% AEP (1-in-100-year) analysis lacks context:** While widely used in flood modelling, the 1% Annual Exceedance Probability (AEP) scenario is by definition hypothetical and represents a statistical construct, not a confirmed event. In the case of 95 Oroua Street, it has been applied without any corroborating local rainfall data, flow monitoring, or evidence of historical flood events. The lack of empirical validation makes its application inappropriate for zoning that affects property rights, insurance and development options.
- **Misuse of community feedback to validate model:** The report uses anecdotal public comments to validate flood modelling in the absence of hard data. However, our comments to HCC, including Social Pinpoint submissions and email correspondence—were made to highlight repeated flooding caused by runoff from HW Shortt Park and

infrastructure failure, not natural overland flow. These comments have been selectively quoted and misrepresented to validate model predictions. Crucially, the context provided in our original messages—identifying the slope of the park, broken nib walls, and lack of drainage—was omitted.

For example, one of our comments submitted to Social Pinpoint stated:

“Flooded the whole street and came into our yard and up to the front door... Number 93 had to sandbag their garage. This has happened twice in a year.”

This has been cited in the Model Build – East Harbour Draft Report (Appendix B, p. 59) as justification for flood hazard classification, but the continuation of our comment, which clearly attributes the cause to runoff from HW Shortt Park and stormwater infrastructure failures, was left out:

“It’s the park across the street that slopes towards the street that is causing trouble. Also drains do not drain anywhere. Plus the nib wall around the park is broken which could help divert run off from the park away from our houses. All has been reported to council before and nothing has happened.”

- **HCC email trail supports our concern:** Further, emails between our neighbours, HCC officers and Wellington Water—such as from as far back as October 2021 and earlier—make clear that flooding on Oroua Street has consistently stemmed from runoff from HW Shortt Park and stormwater discharge issues. These emails were either not passed on to WWL for inclusion in the modelling dataset or were ignored during model validation. This failure to appropriately account for known infrastructure limitations undermines the credibility of the model as a tool for hazard zoning.
- **Meeting with Councillors went nowhere:** A meeting was held between neighbours, Councillor Simon Edwards and Deputy Mayor Tui Lewis on 10 October 2021 regarding the infrastructure issues. No substantive action followed this meeting.
- **Recent meeting confirmed mitigation is needed:** A second more constructive and productive meeting was held on 3 April 2025 involving Deputy Mayor Tui Lewis, Bruce Hodgins from HCC, and John Baines from Wellington Water. During that meeting, site visits confirmed the infrastructure problems identified by residents. HCC acknowledged the park’s surface runoff was contributing to flooding and agreed to investigate several remediation measures, including raising the nib wall, installing new drainage along the park’s eastern edge, and improving sump performance near the tennis courts. Wellington Water also agreed to review the undersized sumps and soak pits outside 91 and 97 Oroua Street. These investigations are ongoing, and the fact that mitigation options are under active consideration demonstrates that the proposed flood hazard rating is premature and unjustified.
- **Flat, well-drained topography:** Our property does not exhibit any of the natural features typically associated with flood-prone areas and has never experienced flooding not linked to public infrastructure deficiencies.
- **Unjustified impact on development and insurance:** The overlay imposes consenting complexity, undermines property value, and may influence insurance costs and conditions – all based on generalised modelling not intended for this purpose.

Additional Questions

1. Does HCC agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding?
2. If HCC does not agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding, why not?

3. Does HCC agree a home with newly installed and upgraded on site soak pits reduces the hazard to that home from coastal inundation and flooding?
4. If HCC does not agree that a home with newly installed and upgraded on site soak pits reduces the hazard to that home from coastal inundation and flooding, why not?
5. If HCC does agree that a home raised above ground level and/or equipped with newly installed soak pits reduces the hazard to that home from coastal inundation and flooding, will HCC (i) obtain relevant information for all homes affected by the Proposed District Plan, and (ii) advise those landowners with elevated homes and newly installed soak pits of their reduction in risk?
6. If HCC will not obtain the information requested in these questions above regarding homes raised above ground level and equipped with newly installed soak pits to reduce the hazard to that home from coastal inundation and flooding, why not?
7. How have the flood lines been drawn?
8. What is the long-term plan to ensure the end-to-end stormwater system and run-off from HCC owned infrastructure is controlled and fit for purpose?
9. What is the long-term plan to ensure rainwater run-off from HCC owned assets and infrastructure is controlled?
10. For our street mitigation options are under active consideration demonstrates that HCC consider that the proposed flood hazard overlay is premature and unjustified?

f. Submission Point – NH Medium Coastal inundation overlay

Remove or amend the medium coastal inundation overlay. The inclusion of our property at 95 Oroua Street in the Medium Coastal Inundation Area overlay is not justified by site-specific evidence or reasonable future risk.

Our reasons:

- **Distance from coast and intervening landforms:** Our property is approximately 200-250 metres inland, separated from the shoreline by HW Shortt Park, tennis courts running between Oroua St and Tuatoru St, Oroua St itself, and other residential dwellings.
- **Inconsistency in hazard overlay application:** Properties located immediately on the waterfront have been assigned the same Medium Coastal Inundation hazard rating as more inland properties like ours. This fails to account for the significant difference in exposure risk, topography, physical barriers, and distance from the coastal edge. A blanket approach is inappropriate and does not reflect actual on-the-ground conditions.
- **Timing and uncertainty of sea-level rise projections:** NIWA's 2023 report projects sea-level rise to 2130 under extreme conditions (SSP5-8.5H+ with 2.14m rise). Observed rise is currently much lower (~3.2mm/year).
- **Need to clarify the use of sea level rise assumptions:** We also seek clarification on whether the Medium Coastal Inundation Hazard Area overlay has been based on an assumed 1.59m sea level rise, rather than the full 2.14m rise projected under the SSP5-8.5H+ pathway referenced in the NIWA (2023) report. If the overlay has been based on a mid-range scenario such as 1.59m, we contest its use for zoning decisions at this time. Current observed rates of sea level rise remain significantly lower than worst-case projections, and it would be premature to impose hazard notations based on intermediate assumptions that are yet to materialise.

- **Observed inaccuracies in SeaRise projections:** Historical projections estimated an 11cm rise between 2005 and 2020; however, tide gauge data shows an actual rise of only around 2cm. This substantial discrepancy highlights the uncertainty and complexity involved in forecasting sea level rise.
- **NIWA modelling not updated to reflect 2025 observations:** The current modelling appears to have commenced before 2010. By 2025, the expected increase of approximately 100mm has not occurred—only around 20mm has been recorded. This undermines confidence in the projections being used to justify hazard overlays.
- **Use of static inundation mapping:** The NIWA study applied static coastal inundation mapping methods for Eastbourne. This approach assumes areas below a certain elevation threshold are inundated without considering hydrodynamic flow or natural barriers, which NIWA acknowledges can lead to conservative and precautionary estimates of flood extent, particularly in areas with complex terrain or coastal defences.
- **Progradation and beach stability:** Independent research by David Olson (MSc Thesis, Victoria University of Wellington, 2010) (https://openaccess.wgtn.ac.nz/articles/thesis/Decadal_Shoreline_Stability_in_Eastbourne_Wellington_Harbour/16974082?file=31398385)

comprehensively documented decadal shoreline changes along Eastbourne's coast, using historical aerial photography and field surveys. His work found significant gravel progradation (natural beach growth) across Robinson Bay, which has materially widened the beach and reduced coastal erosion and inundation exposure over the last 70 years. These findings should be considered before applying future inundation overlays based solely on static modelling.

One of its foci, detailed in thesis Chapters 5 and 6, is tracking the beach progradation caused by the northward moving gravel front which, by 2010, had reached the southern part of Days Bay, ~20 km north of its Orongorongo sediment source. This gravel front is very evident along the length of Robinson Bay. In this regard Olson writes, quote:

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"Recently, the gravel front has rendered the (Robinson Bay) sea wall redundant, and the metal groynes have been removed as a safety measure, as only the tips were protruding from the gravel, creating a hazard for walkers."

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"Eastbourne beach between Windy Point and Burdans Gate has increased in area from approximately 100,000m² in 1941 to 200,000m² (in 2008), and the measured Pencarrow shoreline has also doubled in area between 1941 and 2001."

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"Northern Robinson Bay maintains back beach zones of sand size sediment with sporadic grassed dunes to the north of the Recreation Ground. South of the Recreation Ground, back beach and foreshore sediment is dominated by gravel. Pockets of sand appear mostly on the low tide terrace, with the remainder of the beach alternating between pebble and granule sized clasts."

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"The most significant shoreline width changes have occurred in Robinson Bay (Fig 5.14), where there has again been a net increase in beach width of up to 60m through the Recreation Ground area and up to 120m through the southern prograding section at Miro Street. Width remained low through the southern part until 1985, when beach

width increased dramatically from 20 to 100m. The northern progradation has generally shown increased width, but with reduction shown in the period from 1969.”

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“The most significant finding to come out of this study relates to whether -

- i. the change currently observed along Eastbourne’s shoreline is a short-term beach adjustment to a gravel pulse, or
- ii. a more permanent adjustment relating to longer term changes in supply and/or transport processes.
- iii. The temporal results of this research have indicated a more permanent change to the morphology and sedimentology of this coastline.
- iv. The historical aerial photographs analysed have shown significant net progradation over 67 years between the Orongorongo River in Pencarrow and Days Bay 20km to the north, with smaller annual erosion/accretion cycles superimposed on the longer-term decadal shoreline advance.”

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“Given the extent of coastal erosion experienced in Eastbourne throughout much of the 20th Century, **from a coastal management perspective, the accumulation of gravel along the beachface is a positive outcome.** It has provided a natural buffer to erosion as the beach is prograding, reducing wave inundation distances and rendering some of the hard engineering mitigation structures redundant, including the removal of the metal groyne system in recent years.”

- The bolding of text above in the two above paragraphs is by this submitter, not Olson.
- Visual inspection in March 2025, 15 years after Olson’s work, lacks his carefully measured precision, however, indicates that the prograding accumulation of gravel along the coastline beachfront from Burdan’s Gate northward has continued.
- Based on the above observation and Olson’s findings that the prograding accumulation of gravel along the coastline beachfront from Burdan’s Gate northward is beneficial, it seems clear that prograded gravel accumulation should be considered in respect to the risk of coastal inundation to the Muritai properties referenced when formulating the Lower Hutt’s Proposed District Plan.
- **Modelling limitations:** The static flood modelling applied in Eastbourne does not account for localised beach profile changes or sediment build-up, and therefore may significantly overstate present and near-future inundation risk.
- **Lack of coastal geomorphic survey:** We request HCC should commission an updated coastal geomorphic survey to assess the ongoing progradation and sediment dynamics along the Eastbourne coastline, particularly the Robinson Bay shoreline fronting Muritai and the surrounding areas. This assessment should apply the methodology and spatial analysis used in David Olson’s 2010 MSc thesis, which documented significant beach width increases and shoreline advancement over the previous 70 years. The reasons for this are:
 - Post-2010 changes remain unmeasured: Olson’s work ended in 2008. However, visual inspections and anecdotal evidence from residents indicate that progradation has continued, further buffering the coast from wave impacts and sea inundation. Without updated measurement and validation, the hazard overlays may now be based on out-of-date shoreline conditions.

- Natural hazard overlays must reflect current risk: The RMA requires that hazard classifications be based on credible, proportionate evidence. A failure to include updated coastal geomorphic data risks overstating risk and imposing unjustified regulatory burdens on properties like ours.
- NIWA and HCC have access to updated remote sensing tools: It is now possible to conduct high-resolution shoreline analysis using aerial imagery, LiDAR, and photogrammetry. These tools can be used to accurately track gravel migration, beach profile shifts, and sediment accumulation since 2010.
- Community and economic implications are significant: Applying hazard overlays without accounting for natural improvements in shoreline resilience could unnecessarily devalue private property, increase insurance costs, and erode community confidence in the PDP process.
- **Mismatch between current conditions and zoning impacts:** There is no history of coastal inundation at 95 Oroua Street. Current flooding concerns relate exclusively to runoff from HW Shortt Park, nearby tennis courts and stormwater infrastructure deficiencies, not coastal processes.
- **Inland extension lacks coastal hazard features:** The extended areas inland across Eastbourne do not exhibit the natural features typically associated with coastal zones prone to sea surge, substantial erosion, or king tide flooding. This further calls into question the appropriateness of applying a Medium Coastal Inundation Hazard rating to properties such as 95 Oroua Street.
- **Concerns about the park, nearby tennis courts and underperforming stormwater infrastructure:** The ongoing issues associated with HW Shortt Park's and nearby tennis court surface runoff and underperforming stormwater infrastructure must be addressed and resolved before imposing long-term coastal hazard designations on nearby residential properties.

Additional Questions

1. Please explain the adoption of the 1% AEP flood event plus 1.59m sea level vs the figures outlined in the NIWA report which only highlight a potential rise of .500mm by 2060, and when actual data suggests that modelling may be incorrect?
2. Will HCC change the overlays based on the actual tidal gauge data?
3. Is HCC or NIWA aware of David Olson's work regarding prograding accumulation of gravel?
4. Does HCC have objective data on the prograding accumulation of gravel after Olson's work, i.e. since 2010?
5. Has HCC considered Olson's work and the significant beneficial effects of gravel progradation in formulating the Lower Hutt Proposed District Plan?
6. If the answer to the above question is yes, has the Medium Risk rating for coastal inundation been amended where gravel progradation is evident?
7. If the Medium Risk rating for coastal inundation has been amended, how?
8. If the Medium Risk rating for coastal inundation has not been amended, will HCC (i) review Olson's work, and the ongoing prograding accumulation of gravel in the 15 years since 2010 and (ii) advise residents of Eastbourne and the eastern harbour bays the outcome of its review?
9. Does HCC agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding?

10. If HCC does not agree that a home raised above ground level reduces the hazard to that home from coastal inundation and flooding, why not?
11. Does HCC agree a home with newly installed and upgraded on site stormwater soak pits reduces the hazard to that home from coastal inundation and flooding?
12. If HCC does not agree that a home with newly installed and upgraded on site stormwater site soak pits reduces the hazard to that home from coastal inundation and flooding, why not?
13. If HCC does agree that a home raised above ground level and/or equipped with newly installed site stormwater soak pits reduces the hazard to that home from coastal inundation and flooding, will HCC (i) obtain relevant information for all homes affected by the Proposed District Plan, and (ii) advise those landowners with elevated homes and newly installed site stormwater soak pits of their reduction in risk?
14. If HCC will not obtain the information requested above regarding homes raised above ground level and/or equipped with newly installed site stormwater soak pits to reduce the hazard to that home from coastal inundation and flooding, why not?
15. Will HCC either (a) undertake or (b) formally request from NIWA or another coastal expert a refreshed coastal geomorphic survey and shoreline analysis for Eastbourne and the wider eastern harbour bays, and if not, why?

g. Incentivise landowners to take useful action

What is not obvious is how Landowners are being incentivised to support the challenges facing the Hutt District?

We acknowledge HCC is facing substantial challenges head on through the proposed District Plan, but the means doesn't justify the end. The changes will erode confidence and support for HCC at a time when given the number of challenges confronting the Hutt District, HCC should be seeking to strengthen rate payer support and engagement.

Has the HCC considered non-financial or financial incentives to encourage the outcomes it is seeking from this proposed District Plan?

h. HCC communication with Landowners

The PDP is a substantial document and takes considerable time to work through the various layers to assess the relevant information.

It has been our experience that many landowners that we have talked to have expressed concern at the limited amount of relevant information provided to them on the effects on their properties as well as any supporting information to communicate the differences between the ODP and PDP.

The web page maps are very helpful to see the proposed state but don't provide any comparison with the current state view.

We have had to obtain external planning advice, at cost, to do a complete comparison review. Placing that burden on individual landowners in this current financial climate is hard to accept and HCC could have done more to support landowners.

The initial March letter we received gave little information and a month to formally respond. The submission period was extended later to 2nd May 2025. Even with the extra time there

has been limited opportunity for us to read the full District Plan and truly understand the implications of the changes proposed.

In both Submission points above we note that there has been minimal consultation with us apart from a simple letter. We consider there is an opportunity for HCC to pull back some of these changes from the PDP to allow for broader discussion and insight from all parties over a far more reasonable and realistic timeframe.

i. Next steps?

We understand that the formal hearings are expected in October 2025.

It is our hope that we can work collaboratively with HCC and would welcome the opportunity to discuss this submission on the PDP with HCC officers prior to the hearing.

It would be good to obtain clarity on the current process and timetable that HCC is following, after receipt of landowner's submissions.

Can you confirm when a timetable and steps will be made available?

j. An assumption that HCC would be wrong to make

We acknowledge the huge amount of work that has gone into the Proposed District Plan picking up on unique and complex challenges and issues that may impact our city.

HCC should not assume that few submissions mean Landowners are not interested. Our discussions with Eastbourne residents and neighbours strongly indicates that many are seriously worried, would like to submit, however have simply been unable to find the time to consider the many issues that have been raised in the PDP. This is especially so for older people who are well beyond the age group able to easily do so, for younger/mid-age people with children at home, and for others who are busy/away and in some way disadvantaged.

These discussions also reveal the high financial pressure and stress that many people are experiencing because of proposed changes to which they have been given little opportunity by HCC to contribute. There is concern that property values will be negatively impacted, and home insurance might become unaffordable if available now to cover certain risks.

Some of the PDP changes are not necessary right now and the HCC has the opportunity to reconsider how far it goes now with all these changes vs a more staggered and timely approach that allows for greater public participation and reduces that pressure and stress.

k. Summary

The PDP introduces new provisions and changes to existing provisions that need either removal or amendment or retention of the status quo, but if introduced need further assessment and qualification to prevent the PDP simply becoming a massively onerous constraint to the future use and re-purposing of our property and the many other similarly impacted properties in Eastbourne.

We request that the **High Flood Hazard Area overlay** and the **Medium Coastal Inundation Hazard Area overlay** be removed or significantly refined to reflect the true on-the-ground characteristics and risks of our property.

The evidence clearly shows that flooding in this area results from inadequate, inefficient, and poorly maintained stormwater infrastructure and runoff from HCC-owned assets and land rather than natural flooding risk. Furthermore, projections of future coastal inundation rely heavily on highly uncertain, long-term sea level rise scenarios and static modelling that overstates present-day risk. Given that HCC and Wellington Water are currently investigating mitigation measures for stormwater issues, and that coastal hazard modelling is based on extreme future projections, applying these hazard overlays at this time is premature and unjustified.

The application of overly broad and unverified hazard overlays risks undermining public confidence in the District Plan, inflating consenting costs unnecessarily, and eroding property rights without cause.

Under Section 32 of the Resource Management Act (RMA), HCC is required to evaluate whether proposed provisions in the District Plan are the most appropriate means of achieving the plan's objectives, having regard to their efficiency and effectiveness, and considering the costs and benefits of those provisions. We submit that applying broad, model-based hazard overlays to private properties, particularly where site-specific risk is low or uncertain, fails to meet these requirements. The significant regulatory, financial, and wellbeing impacts on landowners have not been transparently evaluated, and the current overlays do not represent a proportionate or targeted regulatory response.

We note that HCC's obligations under the RMA and Local Government Act (LGA) require it to manage natural hazards in a way that is proportionate, site-specific, and sensitive to both environmental and financial impacts on communities. Applying long-horizon hazard overlays based on highly uncertain projections risks exceeding those obligations.

The proposed overlays may have material impacts on insurance access, property values, and redevelopment potential, which HCC must weigh carefully when assessing the proportionality and justification for hazard classifications.

We would welcome the opportunity to engage further with HCC staff to discuss these matters.

We wish to be heard in respect of this submission.

It is our hope that we can work collaboratively with the HCC and would welcome the opportunity to discuss this submission on the PDP with HCC officers prior to the hearing.

Yours sincerely,

[Insert Signatures]

The image shows two handwritten signatures in black ink. The first signature is on the left and the second is on the right. They appear to be the signatures of Grant and Kristin Gunn.

Grant & Kristin Gunn
(as Trustees of the Gunn Family Trust)
95 Oroua Street
Eastbourne
Lower Hutt 5013

Appendix 1 Maps



Appendix 2 Decisions Requested

#	Chapter	Provision	Position	Reasons	Relief sought
1	NH – Natural Hazards – Flood zones	[whole chapter – objectives - NH-02, NH R12 Policies P2, P8, P9, R9, R10, R11, R12	oppose	<p>In accuracies in maps presented. No historical evidence to support requirement. Future modelling is untested and is a guide only. Its use is not appropriate on private properties especially in areas of low historic flooding.</p> <p>The risks can be mitigated by HCC and Wgtn Water not shifted to private owners to resolve through building changes to each property</p> <p>Remove the various new rules that apply to low hazard and medium hazard sites.</p>	<p>Removal of the hazard overlays until better data can be provided.</p> <p>Remove R8 compliance requirement in existing properties, where the existing property does not meet this standard.</p> <p>P9 and R9 - Remove the requirement within Medium Flood Hazard overlays for all subdivision, use and development to provide for unimpeded and unobstructed conveyancing of flood waters as this will require major changes to property and a major loss of utilisation and value.</p>
2			oppose in part (alternative solution)	<p>Maps are not accurate and place unnecessary burden on landowners</p> <p>Remove R8 compliance requirement, due to the impracticalities of providing finished floor levels to the required standard in existing properties where the balance of the property does not meet this standard.</p> <p>The risks can be mitigated by HCC and Wgtn Water not shifted to private owners to resolve through building and hazard rating changes to each property</p>	<p>Recognition that flood risks exist in District Plan.</p> <p>Recognition that some areas historically have been affected but do not place any zones on individual properties as this cannot be done with any degree of accuracy.</p> <p>Ensure the building consent processes consider the type of construction for new standalone structures where the existing construction meets the new hazard rules. Otherwise the ODP rules apply.</p>

#	Chapter	Provision	Position	Reasons	Relief sought
3	NH – Natural Hazards – Inundation Area	[whole chapter – objectives - NH-02, NH R12 Policies P2, P8, P9, R9, R10, R11, R12	Oppose	<p>Hard to know what areas of the rules apply to the Inundation Area</p> <p>Future modelling is complex, is not site specific and is a model only. Actual data suggests the risk is less.</p> <p>Remove the various new rules that apply to low hazard and medium hazard sites.</p>	<p>Removal of the hazard overlays until better data can be provided.</p> <p>Amend P9 - Impracticable for private owners to convert to above 1% AEP.</p> <p>Under natural hazard risk – impractical to integrate the range of potential mitigation measures into provide properties, needs further discussion.</p>