

Submission on publicly notified proposed district plan

Clause 6 of Schedule 1, Resource Management Act 1991

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To: Chief Executive, Hutt City Council

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

1. This is a submission from Christene Loweth of 1 Awamutu Grove, Waiwhetu, Lower Hutt on the Proposed Lower Hutt District Plan 2025.
2. My email address for service is christeneloweth@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.

Introduction

7. I am a resident of Waiwhetu Lower Hutt, my concern is about the increased population in an already highly populated area and the risk to life in the event of a disaster, I have personally experienced difficulty leaving my area in busy times without a disaster. Also there are many who would find it difficult to evacuate via foot to a safe area.

Decisions Requested please see attached

Concern: There is confusion between the High-Density zoning and the Flood, Tsunami, and Liquefaction Overlays within the area that I am relating to. As we fall in the High-Density zoning but also the Medium to High flood zone overlays/Tsunami and Liquefaction..

Request: Utilise the Flood Hazard Overlay to limit housing intensity in high-risk areas, specifically by discouraging multi-level dwellings and restricting building heights to two stories.

Reason: The combination of High-Density zoning and the Flood Hazard Overlay creates conflicting management priorities, particularly with respect to civil defence and flood risk. Flood-prone areas need more careful consideration of population density to ensure effective evacuation and preparedness during emergencies.

Civil Defence: High population concentration in flood zones complicates civil defence efforts, as the ability to evacuate and support vulnerable individuals becomes increasingly challenging. Evacuating people on foot within 30 minutes—especially when some have mobility issues—would be incredibly difficult, if not impossible. Limiting intensification will ease these concerns by reducing the strain on emergency response systems and providing more manageable evacuation routes.

Additional Vulnerability: Many residents in these areas have additional needs, such as mobility issues, that would make it harder for them to evacuate quickly in a flood or tsunami event. To ensure everyone's safety, we must address this vulnerability by further limiting intensification in these zones, ensuring the evacuation process is feasible for all residents.

Concern: I am very concerned with the amount of permeable surface with the new residential rules. I agree with HRZ-S7 that at least 30 percent of the surface should be permeable. Increased development in flood-prone areas also impacts the natural permeability of the land, leading to greater strain on the stormwater system.

Request: By limiting further intensification and multi-level buildings, we can preserve the permeability of the land, ensuring that rainwater is able to soak into the ground rather than being diverted into an already overwhelmed stormwater system.

Reason: As more buildings are constructed, especially with impervious surfaces like concrete and asphalt, the land's ability to absorb rainwater diminishes. This increased runoff, coupled with an overburdened stormwater infrastructure, leads to greater risk of localised flooding, waterlogging, and damage to both properties and the environment. Reducing the density of development and encouraging designs that allow for more

permeable surfaces can help alleviate the pressure on the stormwater system, reduce flooding risks, and enhance the natural absorption of rainwater into the soil.

Concern: with the increase high density and limited parking this is causing a hazard on the streets with parked cars, safety to pedestrians and children walking to and from schools.

Request: Make sure the roads are wide enough to accommodate parked vehicles or make it mandatory for the new premises to have parking/off street parking.

Reason: The safety of residents, especially children who in my street tend to play outside. With the additional vehicles now required to park on the street this is causing visibility problems. Also passing on the street is restricted and if we had to evacuate quickly this would not be possible within the 30 minutes. The extra vehicles now parking on the street cause a passing problem, health and safety problem.

#	Chapter	Provision	Position	Reasons	Relief sought
1	Table of Contents	Coastal Environment	Neutral	Include Coastal Environment in the Table of Contents. Refer paragraph 27	Include Coastal Environment in the Table of Contents under "District Wide" not under "General" as it is an Overlay in the maps and difficult to find.
2	Definitions	NH-P8 NH-R9	Neutral	Not provided. Refer paragraph 21	What does this mean in reality "1% Flood Annual Exceedance Probability level"
3	Maps	Overlay Boundaries	Oppose in part	Overlay boundaries may have issues Refer to Paragraphs 37 to 42	Change the risk level of the "pockets" of a lower risk within a larger risk for the Flood and Tsunami Overlays. Make the boundaries between different risk levels along property boundaries, and preferably along roads i.e 2, 4, 8, 22 Awamutu Grove,
4	Natural Hazards	NR-R9	Neutral	Inconsistent with other rules	Additions to existing buildings <u>and structures</u> that contain activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Flood Hazard Overlay

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5	Natural Hazards	NH-R14	Oppose	Residential buildings greater than 4 stories are restricted discretionary but buildings less than 4 stories are non-complying in a hazard area. Refer paragraph 24	Activity status: Restricted discretionary Where: The new building or conversion of an existing building is for an apartment development of two storeys or greater <u>less</u> in height.
6	Natural Hazards	NH-P10	Oppose	Residential apartments greater than 4 stories or greater are restricted discretionary but buildings less than 4 stories are non-complying in a hazard area. Refer paragraph 24	Provide for residential apartments within the Medium Flood Hazard Overlay and High Flood Hazard Overlay where: 1. The residential apartment building is at least two stories <u>or less</u> in height,

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7	Natural Hazard	NH-P11	Oppose	The ability for evacuation extends beyond those listed. All activities should be Restricted Discretionary. Refer to paragraph 25 and 26	<p>Allow the development of new building platforms, structures, and the adaptation of existing buildings for childcare centres, retirement villages, educational institutions, hospitals, emergency service facilities, and healthcare centres within the Liquefaction Hazard Overlay, provided that:</p> <p>a. It can be confirmed that occupants will be able to evacuate safely in the event of an earthquake that causes soil liquefaction;</p> <p>b. Measures are in place to ensure continued functionality after a disaster, including foundation designs by a certified engineer to mitigate liquefaction-related structural deformation; and</p> <p>c. For emergency service facilities, hospitals, and healthcare centres, it can be demonstrated that emergency vehicles will have safe access to and from the site to support the affected community.</p>

#	Chapter	Provision	Position	Reasons	Relief sought
8	Natural Hazard	NH-R17	Oppose in part	All activities should be Restricted Discretionary. The ability for evacuation extends beyond those listed. Refer to paragraph 25 and 26	<p>1. Activity status: Permitted Where: The new building is not for a child care service, retirement village, educational facility, emergency service facility or health care activity.</p> <p>2. Activity status: Restricted discretionary Where: Compliance with the requirements of NH-R17.1 cannot be achieved. Matters of discretion are restricted to: The relevant matters in NH-P11: Subdivision, Use and Development in the Liquefaction Hazard Overlay.</p>
9	Coastal Hazard	CE-O3	Oppose in part	The current Objectives and Rules are inadequate to prevent loss of life in Coastal Hazard Overlays. Stronger measures are needed to ensure safety, resilience, and emergency access in the face of coastal hazards. Refer paragraphs 36	Subdivision, use, and development within the High Tsunami and High Coastal Inundation Hazard Overlays must minimise or prevent any increase in risk to people, buildings, and infrastructure from coastal hazards.
10	Coastal Hazard	CE-O4	Oppose in part	The Objectives and Rules lack the necessary strength to effectively safeguard lives within Coastal Hazard Overlays. Refer to paragraphs 36	Subdivision, use, and development within the Low and Medium Tsunami Hazard Overlays and the Medium Coastal Inundation Hazard Overlay must minimise risk to people, buildings, and infrastructure from natural hazards.

#	Chapter	Provision	Position	Reasons	Relief sought
				for further details.	
11	Coastal Hazard	CE-P9	Oppose in part	<p>The Objectives and Rules are not strong enough to protect lives in Coastal Hazard Overlays. Refer to paragraph 30 for further details.</p> <p>Additionally, all areas within the Low Tsunami Hazard Overlay fall within the Medium Coastal Overlay, making point 2 redundant. Refer to paragraphs 21 to 29.</p>	<p>Ensure subdivision, use, and development effectively manage coastal hazard risks to people, buildings, and infrastructure by:</p> <ol style="list-style-type: none"> 1. Avoiding new buildings and activities in the High Tsunami and High Coastal Inundation Hazard Overlays, except in the General Industrial Zone and Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone, and the Seaview Marina Zone—where development is permitted only if there is an operational or functional need, and risks are minimised. 2. Recognising the regional significance of the General Industrial and Heavy Industrial Zones in Seaview, the Metropolitan Centre Zone in Petone, and the Seaview Marina Zone, while ensuring that development in these areas mitigates risks from coastal hazards in the Medium and High Coastal Hazard Overlays. 3. Requiring subdivision, use, and development in Low and Medium Coastal Hazard Overlays to minimise risks to people, buildings, and infrastructure.

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					4. Allowing development with low occupancy or low replacement value within Coastal Hazard Overlays.
12	Coastal Hazard	CE-P14	Oppose in part	<p>The Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays. Refer to paragraph 30 for further details.</p> <p>Additionally, all areas within the Low Tsunami Hazard Overlay are also within the Medium Coastal Hazard Overlay, making point 2 redundant. Refer to paragraphs 21 to 29.</p>	<p>Additions to existing buildings and structures in the Coastal Hazard Overlays should be managed as follows:</p> <p>1 Allow additions to existing buildings and structures for activities least sensitive to natural hazards in all areas of the Coastal Hazard Overlays.</p> <p>2 Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards or activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays and High Coastal Hazard Overlays where:</p> <ol style="list-style-type: none"> The addition is of limited size, The addition enables the continued use of the existing building, The addition incorporates measures that minimise the risk to people and buildings from coastal inundation due to sea level rise, and Safe pedestrian evacuation routes are available for occupants from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture. <p>5. <u>Do not</u> allow for additions to existing buildings and structures containing activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays and High Coastal Hazard - Safe pedestrian evacuation routes are available for occupants from tsunami hazards, assuming the</p>

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					tsunami arrives within 30 minutes of fault rupture.
13	Coastal Hazard	CE-P15	Oppose in part	<p>Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays. Refer paragraphs 30.</p> <p>Note that all areas within the Low Tsunami Overlay are covered by the Medium Coastal Overlay, making the Low Tsunami Overlay reference redundant. Refer paragraphs 21 to 29.</p>	<ol style="list-style-type: none"> 1. Allow new buildings and structures in the Coastal Hazard Overlays only if they are for activities least sensitive to natural hazards. 2. Allow the conversion of existing buildings for activities potentially sensitive to natural hazards in the Coastal Hazard Overlays. 3. In the Medium and High Coastal Hazard Overlays, only allow new buildings and structures in areas like Seaview, Petone, and Seaview Marina if: <ul style="list-style-type: none"> ○ The building size is appropriate, ○ Measures are in place to reduce risks from coastal hazards, ○ Safe pedestrian evacuation routes are provided for tsunami evacuation, assuming the tsunami arrives within 30 minutes. 4. Require that new buildings in the Medium Coastal Hazard Overlay include measures to reduce risks from coastal hazards and provide safe evacuation routes. 5. Only allow new buildings in the High Coastal Hazard Overlays if: <ul style="list-style-type: none"> ○ They incorporate measures to reduce risks from coastal hazards,

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					<ul style="list-style-type: none"> Safe pedestrian evacuation routes are available in the event of a tsunami. <p>6. Avoid new buildings or structures in the High Coastal Hazard Overlays unless the building:</p> <ul style="list-style-type: none"> Has an operational need to be in that location, Includes mitigation measures to reduce risk to life, Provides safe evacuation routes for tsunami hazards, assuming the tsunami arrives within 30 minutes.
14	Coastal Hazard	CE-R10	Oppose	<p>Additions to existing buildings and structures for activities most sensitive to natural hazards should not be allowed, particularly in the Medium Coastal Hazard Overlays. Refer paragraphs 30</p>	<p>CE-R10</p> <p>The current provisions do not adequately address the risks to people and buildings in these areas, particularly regarding evacuation safety and the potential impact of coastal hazards.</p>
15	Coastal Hazard	New Rule	Support	<p>There should be a prohibition on any additions to buildings for activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays. Refer paragraphs 30</p>	<p>Adding to buildings in these areas increases the risks to people and buildings, particularly concerning evacuation safety in the event of coastal hazards.</p> <p>Prohibited</p>

#	Chapter	Provision	Position	Reasons	Relief sought
16	Coastal Hazard	CE-R12	Oppose	There should be no additions to buildings for activities most sensitive to natural hazards. Refer paragraphs 30	1. Activity status: Change from Discretionary to Prohibited
17	Coastal Hazard	CE-16	Oppose	There should be a prohibition on new buildings for activities most sensitive to natural hazards.	<p>1. Activity status: Permitted</p> <p>New buildings for sensitive activities like childcare services, retirement villages, hospitals, and emergency service facilities should not be permitted in these areas, given the risks involved</p> <p>Where a new building replaces an existing one, the combined total land area covered by both the new and existing buildings should not exceed 120% of the footprint of the existing building as of 31 December 2024. Additionally, in Medium and High Flood Zone Overlays, the design must prioritise maintaining land permeability to allow rainwater to naturally infiltrate the ground. This will help mitigate the risk of excessive stormwater runoff, which can exacerbate flooding in areas where the stormwater system is already overwhelmed, particularly in high-density development zones with closely spaced buildings</p>