

RMA Form 5

# 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](mailto:district.plan@huttcity.govt.nz).

1. This is a submission from Laura Skilton on the Proposed Lower Hutt District Plan 2025.
2. My email address for service is lauraskilton@hotmail.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 made a submission in the draft District Plan. I also made a submission on PC56 and spoke at the hearing. I am a Transport Planner and currently work for Marlborough Roads. In my role I review the transport effects of Resource Consents for Council. As such, I have an understanding of how District Plans work. Some of my concerns have been raised before, but I feel strongly that these should be considered. I am a resident of Petone, so my submission was initially

focussed on the issues here, however with the time extension, I was able to consider other matters.

8. After reading the Residential, Commercial and Transport Sections, I have come to the conclusion that the Proposed Plan effectively allows any residential and commercial activity to occur anywhere outside of an industrial zone. While I have not reviewed the Industrial zones, it would not surprise me if commercial and residential can occur here also. This is a huge concern to me. First and foremost the Council is concerned about the city central “dying” and are undertaking expensive rejuvenation projects to make it a “thriving” place<sup>1</sup>. Allowing commercial “anywhere” and rezoning land that is presently residential to either “local centre”, “neighbourhood centre” or mixed use” will deteriorate the City Centre and Petone Metropolitan areas further. This is discussed in greater detail under the “commercial” heading.
9. In general, I do not consider that the Proposed Rules are strong enough. I have been told that around 98% of Resource Consents applications get approved, even if rules are not met. The existing wording of the Plan tends to state that if a rule or standard is not met, then the activity changes from Permitted to either Restricted Discretionary or Discretionary. As the rules already effectively are “do what you like” in terms of affects to adjacent properties, then if the standards are breached, they should be non complying or even prohibited.

## Natural Hazards

10. Before I discuss the Overlay Rules in terms of natural hazards and coastal hazards, I want to remind the commissioners of specific media releases and reports on the affects of these hazards on human life. As stated in Paragraph 9, the Rules still allow intensification in areas prone to hazards.
11. In 2018 Hutt City Council did a study and publicly stated that Petone could be under water by the end of the century. This was reported in Stuff on 28 November 2018<sup>2</sup>.
12. On 17 August 2022<sup>3</sup> there were concerns about Petone. The scoop article includes images of flooding on Udy Street in 2016.
13. An article on the National Radio on 25 February 2023<sup>4</sup> covered research by Professor Jonathan Boston, a Climate Change expert. The article mentions relocating climate prone townships and includes direct reference to Petone.

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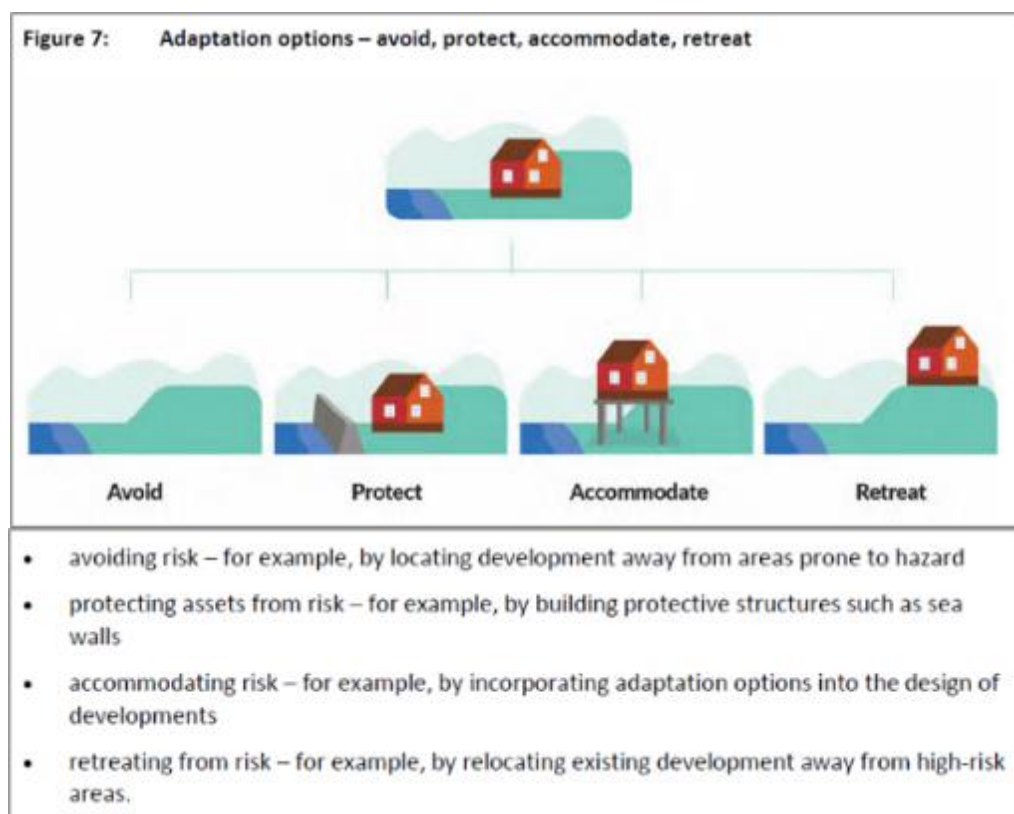
<sup>1</sup> <https://www.huttcity.govt.nz/environment-and-sustainability/urban-planning/central-city-transformation-plan>

<sup>2</sup> <https://www.stuff.co.nz/environment/climate-news/108862230/lower-hutt-suburb-could-be-swallowed-up-by-sea-level-rise-in-just-80-years>

<sup>3</sup> <https://wellington.scoop.co.nz/?p=146707>

<sup>4</sup> <https://www.rnz.co.nz/national/programmes/saturday/audio/2018879410/prof-jonathan-boston-how-to-manage-managed-retreat>

14. Greg Hurrell, and insurance expert stated on 22 September 2023<sup>5</sup> that Petone and other communities can't be protected against climate change. On 14 October 2023<sup>6</sup>, The Post highlighted that Petone property owners will not be able to get insurance soon due to sea level rise.
15. The National Adaptation Plan was published in August 2022<sup>7</sup> and sets out actions to respond to climate change. In the introduction message from James Shaw, he says "care will need to be taken to manage .... development in at risk areas". Many areas in Lower Hutt are at risk and therefore need careful consideration. Page 79 of the National Adaptation Plan highlights that many communities are already under threat from natural hazards and states that "Councils and communities should consider the full range of adaptation options for areas under threat", including avoid, protect, accommodate, and retreat. These are shown in Figure 7 of the Plan that I have repeated below. As Petone has been highlighted as a place to retreat, the rules in the Proposed District Plan must not allow further intensification.

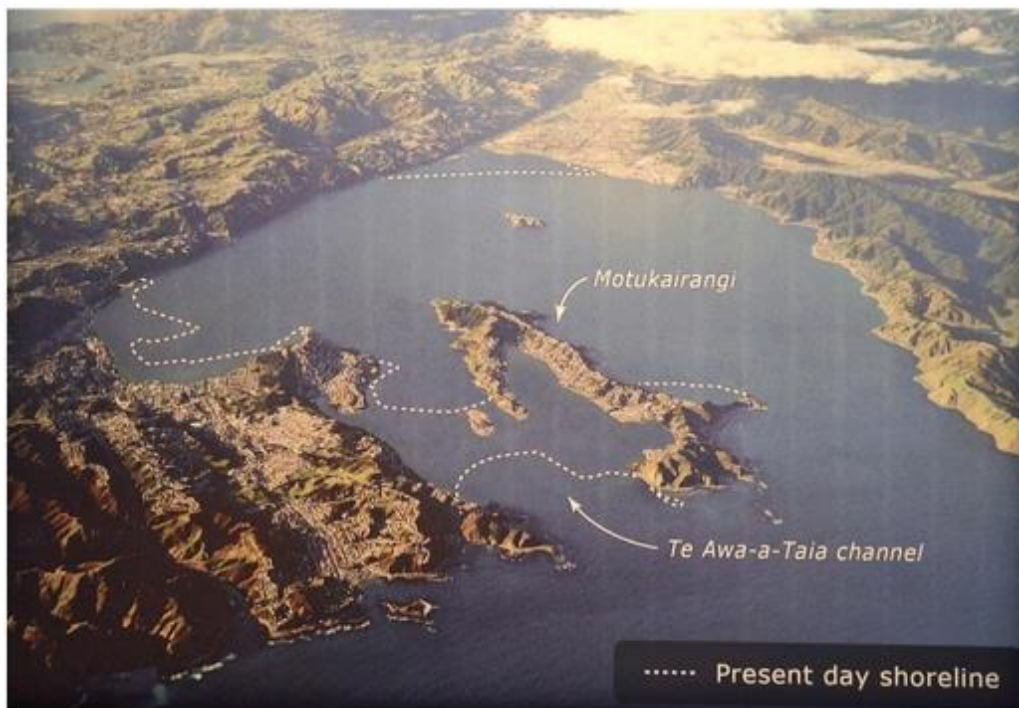


16. Below is an image that is at the City to Sea Museum in Wellington. It shows that estimated future coastline.

<sup>5</sup> <https://businessdesk.co.nz/article/infrastructure/petone-and-other-communities-cant-be-protected-against-climate-change-says-insurer>

<sup>6</sup> <https://www.thepost.co.nz/nz-news/350082200/how-long-will-insurers-stick-petone>

<sup>7</sup> <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>



## Natural Hazard Overlays

17. Generally, I feel that the standards are too low in the Natural Hazard Overlays. While the Objectives mentioned risk to life, effectively any development can still occur, even to the most “sensitive activities” as these are only *Restrictive Discretionary* or *Discretionary*. The Rules need to be strengthened to include *non-complying* and even *prohibited*. As I have previously mentioned, there should not be any intensification in the Natural Hazard and Coastal Hazard Overlay areas.
18. Splitting the Rules by Hazard type is supported.
19. The wording on page 2, above “Objectives” mentions three types of activities that are sensitive, being “most”, “potentially” and “least” however there is no explanation to what these activities are, as I had printed the plan to read rather than use the electronic version. Additional words are needed to refer to the definitions. It was very difficult to find the definition page and I had to do a search without being in the chapter.
20. In order to work out what the different rules in different overlays and activity areas were, I set up some tables for myself. Below is an example for the rules for different Flood Hazard Overlays. I think this would be useful for all the overlays to have a similar table to make it easier for a person to know which rules relate to their property.

	activities least sensitive to natural hazards	activities potentially sensitive to natural hazards	activities most sensitive to natural hazards
Low Flood Hazard Overlay	NH-R7 NH-R10	NH-R8 NH-R12	NH-R8 NH-R12
Medium Flood Hazard Overlay	NH-R7 NH-R11 NH-R14	NH-R9 NH-R13 NH-R14	NH-R9 NH-R13 NH-R14
High Flood Hazard Overlay	NH-R7 NH-R11 NH-R14	NH-R9 NH-R13 NH-R14	NH-R9 NH-R13 NH-R14

21. I note that above the Coastal Environment Rule, the following table appears. This should be considered in the Natural Hazard Rules also.

<p><b>Note:</b></p> <ul style="list-style-type: none"> <li>• The policies, rules and standards for <u>subdivision within the coastal environment</u> are located in the Subdivision chapter.</li> <li>• The policies, rules and standards for <u>earthworks within the coastal environment</u> are located in the Earthworks chapter.</li> <li>• The policies, rules and standards for <u>infrastructure within the coastal environment</u> are located in the Infrastructure chapter.</li> <li>• The policies, rules and standards for <u>renewable electricity generation within the coastal environment</u> are located in the Renewable Electricity Generation chapter.</li> <li>• The landward extent of the <u>coastal environment</u> and areas of high, very high or outstanding natural character within the <u>coastal environment</u> may be subject to additional provisions and overlays, e.g. Outstanding Natural Features and Landscapes (Natural Features and Landscapes chapter) or Natural Character (Natural Character chapter).</li> </ul>	
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22. The document repeatedly mentioned “1% Flood Annual Exceedance Probability level”, yet I can not find a definition for this. It would be more useful to have a height above sea level, or a height above natural ground. If the level changes over time, then this makes a mockery of the low/medium and high flood overlays and this should be used for all.
23. Areas within flood overlays should not be allowed to have concrete floors. Should there be flooding, houses with piles have additional protection as water can drain under the house.
24. Child care service, retirement village, educational facility, emergency service facility or health care activity are singled out in NH-P11 and NH-R17, yet the reason for this is not clear. I assume it is considered that the occupants of these facilities will take longer to evacuate a building. However no time scale is provided. In other areas I recall reading a 30 minute requirement to get to safe ground. If this is the case, it needs to be added to the Policy.
25. I am concerned that 6 stories of residential apartments can still be constructed without the evacuation requirements. For example, I know several people that are not in childcare or retirement villages that have mobility issues. There are more people in our community that would have difficulty evacuating.
26. I note that SUB-R13 states that within a Liquefaction Hazard Overlay, subdivision for most sensitive activities is a Controlled Activity, but no mention is made to subdivision in a Liquefaction Hazard Overlay for least sensitive and potentially sensitive activities. Is this an oversight? I also note that Subdivision in the other Natural Hazard Overlays are Restricted Discretionary for Most Sensitive activities, rather than only controlled. I believe this should be consistent.



## Coastal Hazard Overlays

27. Generally, I feel that the standards are too low in the Coastal Hazard Overlays. While the Objectives mentions risk to life, effectively any development can still occur, even to the most sensitive activities as these are only *Restrictive Discretionary* or *Discretionary*. The Rules need to be strengthened to include *non-complying* and even *prohibited*. As I have previously mentioned, there should not be any intensification in the Natural Hazard and Coastal Hazard Overlay areas.
28. Coastal Environment and Coastal Hazard are in the “General District Wide Matters” within Part 2 of the Plan. As they have significant rules, I consider they should be moved up a level in a similar way as “Hazards and Risks”. It will also make it easier to find the rules for Coastal Overlays.
29. While reviewing the Plan, I have had extreme difficulty determining what can be undertaken in the Tsunami Hazard overlays, as these are difficult to locate within the Plan and are actually within the Coastal Hazard Overlays.
30. The Coastal Hazard Overlay covers the following overlays on the maps:
- Low Tsunami Hazard Overlay
  - Medium Tsunami Hazard Overlay
  - High Tsunami Hazard Overlay
  - Medium Coastal Inundation Hazard Overlay, and
  - High Coastal Inundation Hazard Overlay
31. The High Coastal Hazard Overlay is a combination of both the High Tsunami Overlay and the High Coastal Inundation Hazard Overlay. Similarly, the Medium Coastal Hazard Overlay is a combination of both the Medium Tsunami Overlay *and* the Medium Coastal Inundation Hazard Overlay. Therefore the rules and maps could be simplified by combining the map overlays to the same as the rule overlays, as they appear to be extremely similar in area anyway.

<b>Proposed Lower Hutt District Plan</b>
Part 1 – Introduction and General Provisions
Part 2 – District-Wide Matters
STRATEGIC DIRECTION
ENERGY, INFRASTRUCTURE AND TRANSPORT
HAZARDS AND RISKS
Contaminated Land
Hazardous Substances
Natural Hazards
HISTORICAL AND CULTURAL VALUES
NATURAL ENVIRONMENT VALUES
SUBDIVISION
GENERAL DISTRICT-WIDE MATTERS
Part 3 – Area Specific Matters
Part 4 – Appendices

### **High Coastal Inundation Hazard Overlay**



### **High Tsunami Hazard Overlay**



To simplify the Rules, I recommend creating a High Coastal Hazard Overlay based on the High Tsunami Overlay area and remove the High Coastal Inundation Hazard Overlay.

**Medium Coastal Inundation Hazard Overlay****Medium Tsunami Hazard Overlay**

To simplify the Rules, I recommend creating a Medium Coastal Hazard Overlay based on the Medium Coastal Inundation Hazard Overlay area and remove the Medium Tsunami Overlay.

32. Based on my viewing of the maps, the Low Tsunami Hazard Overlay is all within the Medium Coastal Inundation Hazard Overlay. As the Medium Coastal Hazard Overlay generally has more restrictive rules, than the Low Tsunami Hazard Overlay, I consider the Low Tsunami Overlay to be redundant, and can be removed. This will also simplify the rules.

**Medium Coastal Inundation Hazard Overlay****Low Tsunami Hazard Overlay**

33. In summary, I consider it would be easier if the Tsunami Hazard Overlays (3) and Coastal Inundation overlays (2) were simplified into simply Coastal Hazard Overlays (2) as per the following, with the rules for the most restrictive rules in each area:
- Medium Coastal Hazard Overlay (Low and Medium Tsunami Hazard Overlay and Medium Coastal Inundation Hazard Overlay)
  - High Coastal Hazard Overlay ( High Tsunami Hazard Overlay and High Coastal Inundation Hazard Overlay)

This would greatly simplify the rules and based on my reading of this section, will not compromise any of the standards. If the commissioners do not agree, then I raise the points in paragraph 34 to 36 also.

34. The Low Tsunami Hazard Overlay is only mentioned separately in CE-R9 in the heading (permitted), but is included in the detail of CE-R15 and CE-R16. As such, it would be easier for a user if the format was the same as the Natural Hazard, where you can see from the title of each Rule which zone and activity level was relevant to that rule, and that a suitable table is provided, refer paragraph 20.
35. My understanding of CE-R16 is that in a Low Tsunami Hazard Overlay, a childcare centre is not permitted. Yet in a Medium Tsunami Hazard Overlay (within the definition of Medium Coastal Hazard overlay) a childcare centre is permitted, provided it does not exceed 200m2. This seems to contradict itself.
36. CE-R16.1 permits new buildings in the Low Tsunami Hazard Overlay (with exceptions), however most of this Overlay is within the Medium Coastal Inundation Hazard overlay, meaning it forms part of the Medium Hazard Coastal Overlay. However in CE-R16.5, a new building is Discretionary, therefore contradicts CE-R16.1 due to the complex Overlay structure within this part of the plan.

CE-R16	
New buildings and structures and the conversion of existing buildings for activities most sensitive to natural hazards in the Coastal Hazard Overlays	
All Zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The new building or structure or conversion of an existing building is located in a Low Tsunami Hazard Overlay, and</li> <li>b. The new building is not for a childcare service, retirement village, educational facility, hospital, emergency service facility or healthcare facility, and</li> <li>c. The number of residential units on a site is no more than three.</li> </ul>
<p>All Zones excluding</p> <p>General Industrial Zone in Seaview</p> <p>Heavy Industrial Zone in Seaview</p> <p>Metropolitan Centre Zone in Petone</p> <p>Seaview Marina Zone</p>	<p>5. Activity status: Discretionary</p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The new building or structure or conversion of an existing building is located in a Medium Coastal Hazard Overlay</li> </ul>

37. A Discretionary Activity can get Resource Consent (with conditions) based on any relevant matter. Around 95% of Resource Consents applications get granted, with conditions. Therefore, it is important that the policies and objectives are clearly defined. CE-O3 states that the Rules “reduce or avoid increasing the existing risk” in high risk overlays while CE-O4 states to “minimise” the risk in medium risk overlays. I consider that these words should be changed to “avoid increasing” and “reduce the risk” respectively. As these are known risks, Council should not be allowing additional intensification in these areas. This means no subdivision, no building additions and no new buildings that intensify the existing conditions, eg a new building can replace an existing building of the same size, but can not be larger.

In the 2022/23 reporting year, New Zealand granted 36,134 new resource consents, a decrease from the 39,773 granted in the 2021/22 year. Land-use consents specifically experienced a 11% drop and were at their lowest level since 2014/15. Additionally, fewer subdivision consents were granted in 2022/23 compared to the previous year. [e](#)

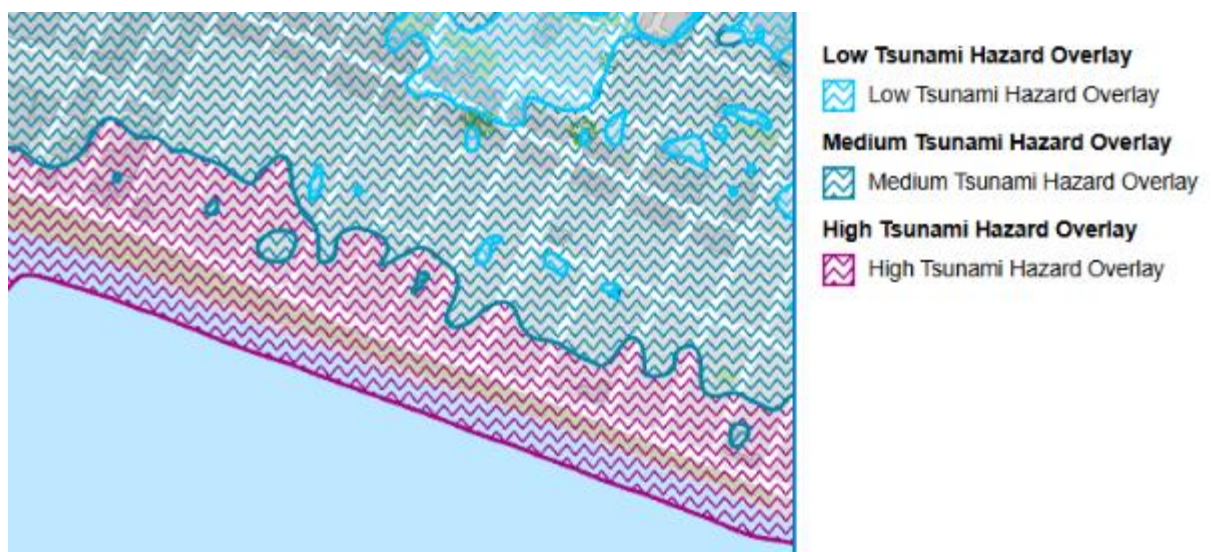
In the 2022/23 year, New Zealand councils processed a total of 38,138 new resource consents. Of those, Auckland Council processed the most with over 10,500. The vast majority of councils, 77 out of 78, processed fewer than 2,500 new resource consents. Christchurch and Marlborough were the second and third highest, respectively, among those processing under 2,500. [e](#)



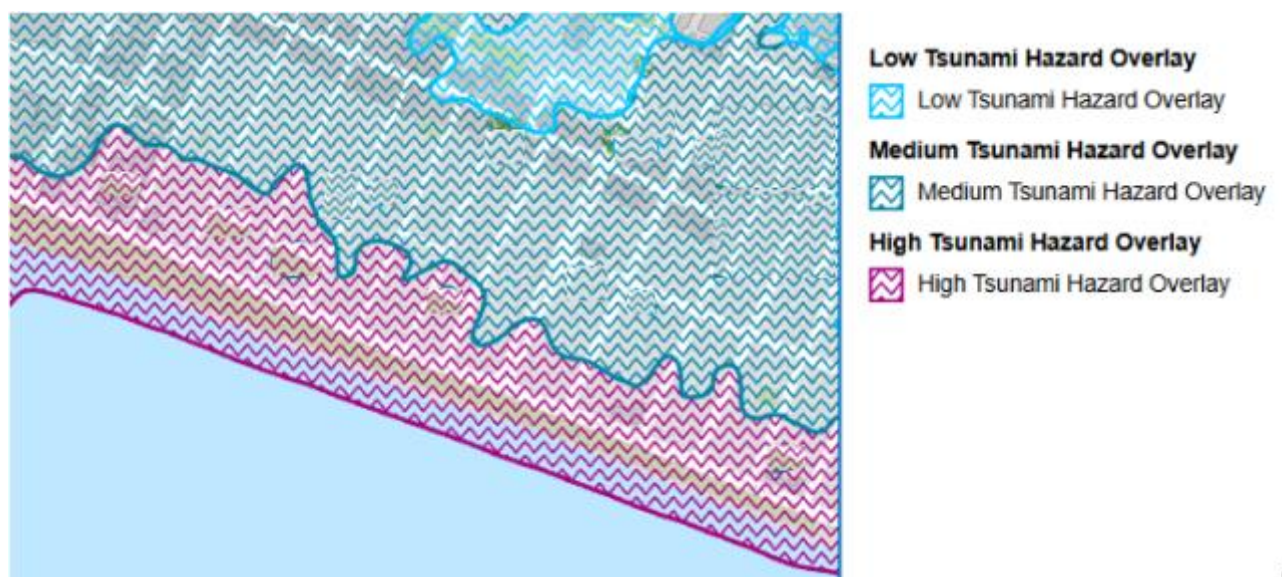
## Maps

38. I have not read all the detailed reports that were used to create the Maps and Rules, however, the Overlay boundaries in the Maps do not make sense to me.
39. The Tsunami Overlays have “pockets” within different levels, eg there are pockets of Low Tsunami inside medium Tsunami areas, and pockets of medium with in the high Tsunami areas. As Petone is flat, I find it incredibly difficult to believe that the modelling is accurate to this level of detail. Also, how can a wave “jump over” one area to another. I suggest that the “pockets” of a lower risk within a larger risk becomes the same as the larger risk. Refer also to Paragraph 30 to 33.

### ***Existing Tsunami Hazard Overlays***



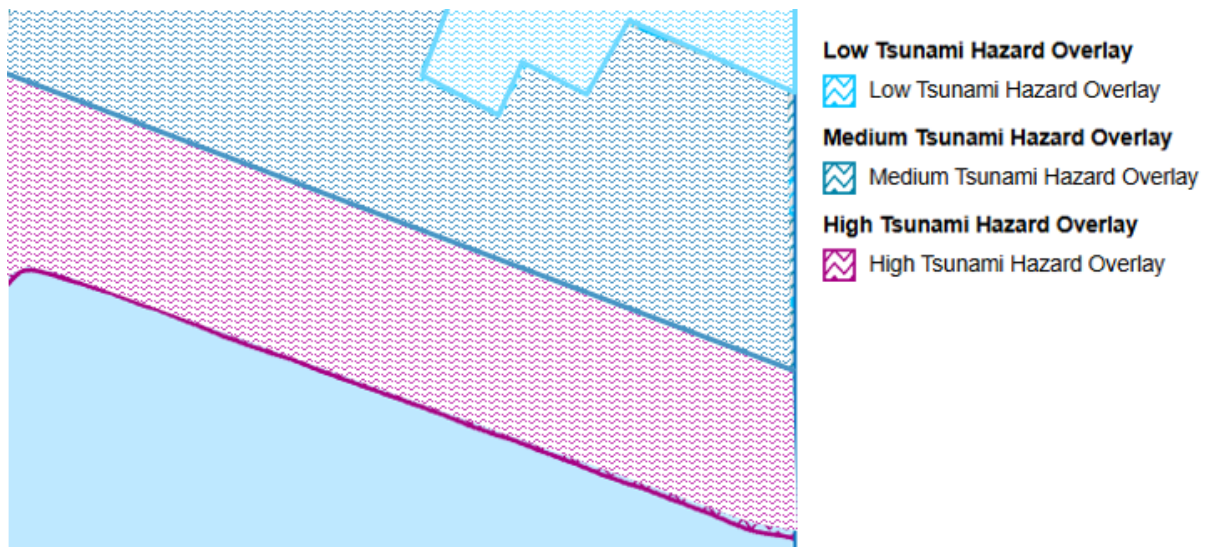
### ***Proposed Tsunami Hazard Overlays***



40. The outline of the hazard areas also split property boundaries, resulting in a property owner that can do one thing on part of their property and another on another part of their property. I

consider that the boundaries between different risk levels is made along property boundaries, and preferably along roads, ie north and south of Adelaide Street (and its extension).

***Preferred Tsunami Hazard Overlays***



Extending the zones, ie increasing the areas of high risk, should be considered, refer to the references within the “Natural Hazards” section of this submission.

41. Similarly to the Tsunami Overlays, the Flood Hazard Overlays also have pockets of lower risk areas within higher risk areas. Refer to paragraph 39 to 40 for how this could and I believe should be simplified.



42. Overpage is a photo of my driveway. Based on the Flood Hazard Overlays, the first third is in the Medium Flood Hazard Overlay and the rear two thirds is in the Low Flood Hazard Overlay. As you



can see, there is no noticeable difference in height, yet the rules vary by Overlay. I have greyed out the houses for privacy reasons.



43. I strongly recommend that the Commissioners do a site visit of Petone and other areas where the Overlays are to see that there is no noticeable difference in elevation for these risk boundaries.
44. I also do not agree with the small pockets of land that are zoned commercial within a residential area. While they may have a corner diary now, they also have existing use rights. I believe that the underlying zone in these individual sites should be the same as the adjacent zone so that, should the existing use transpire, it reverts to the surrounding area. Refer also to paragraph 67 to 73 regarding simplifying the five commercial zones.

***Existing Zones with pockets of alternative land use***



### Recommended Simplified Zones



**Preferred Zones** Refer to paragraph 69 to 76



## High and Medium Density Residential Zones

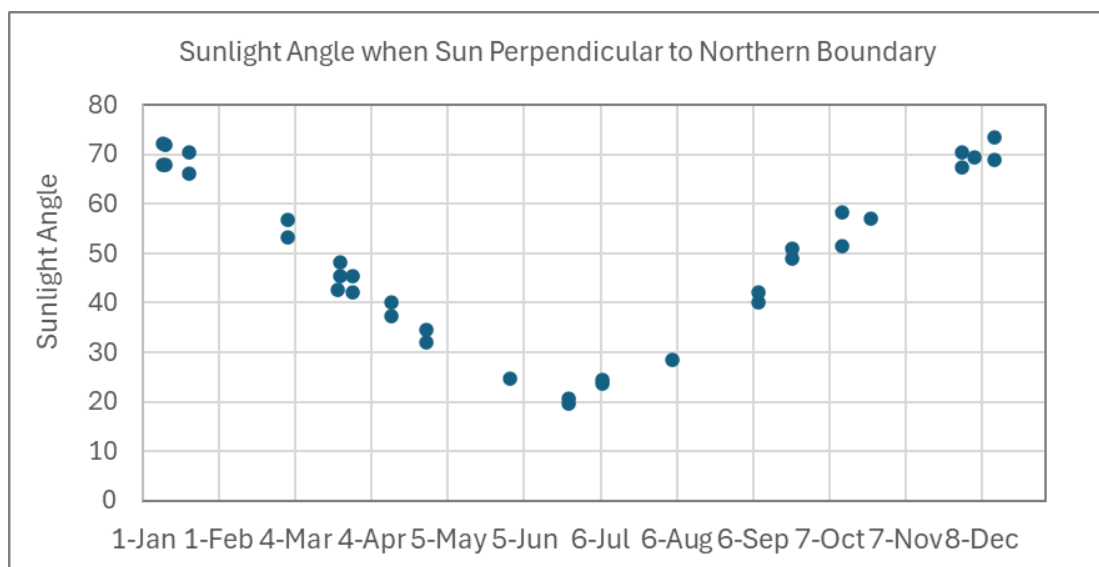
45. I have read the High Density Residential Zone section and flicked through the Medium Density section. Other than the difference in height, 11m vs 22m, they appear to be identical in nature. My comments in this section relate to the High Density, however the specific Decisions Request Table covers both the High Density Residential and Medium Density Residential Rules. I am also aware that the rules to a large part are due to Government Policy and outside the control of Council. I have not read the Large Lot Residential zone rules, but some of my comments may apply here also.



46. HRZ-P12.2 and HRZ-P12.3 infer that the adjacent site is not adversely affected by these rules. These policies need to be altered as there will be adverse effects. A development of 12 townhouses were recently constructed at 55 Britannia Street, Petone. They are all two story, three bedrooms, with no off street parking. As soon as the development had building consent, the southern neighbour sold their house due to adverse effects. . These are only two story, not six stories that the underlying zone allows, yet the adjacent neighbours were forced to move to keep their existing living standards.

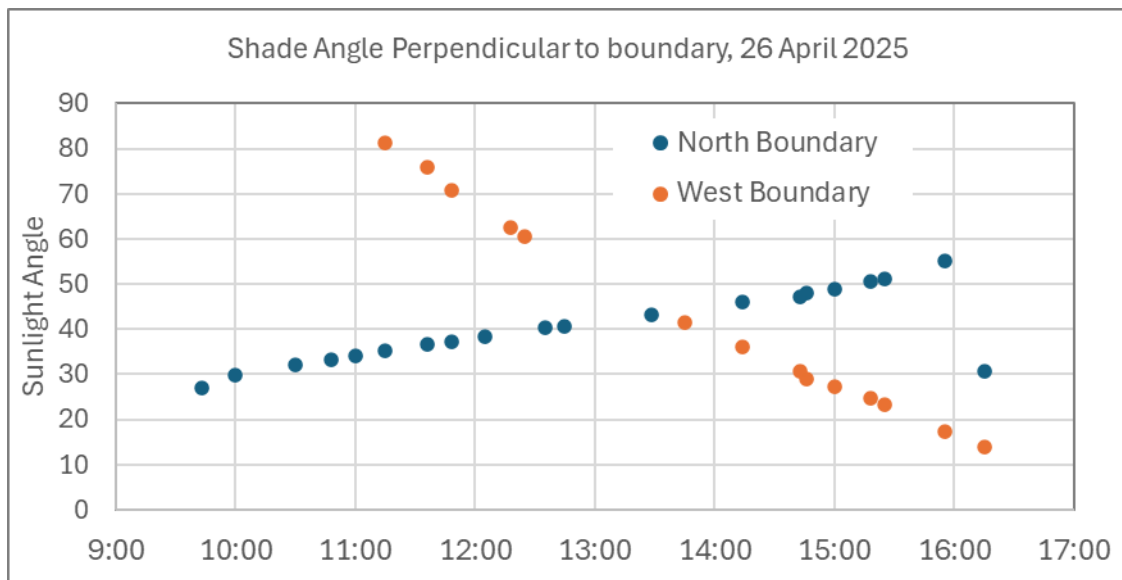


47. I am aware that the Government has set the recession plane boundaries. This was based on sun angles in Auckland. The angle of the sun in winter months is lower the further south you go. Since the Government set the High Density Rules, I have been measuring the daylight plane of the sun at various times of the year, when the sun is perpendicular to my property boundary (around mid day). The sunlight angles are graphed below.



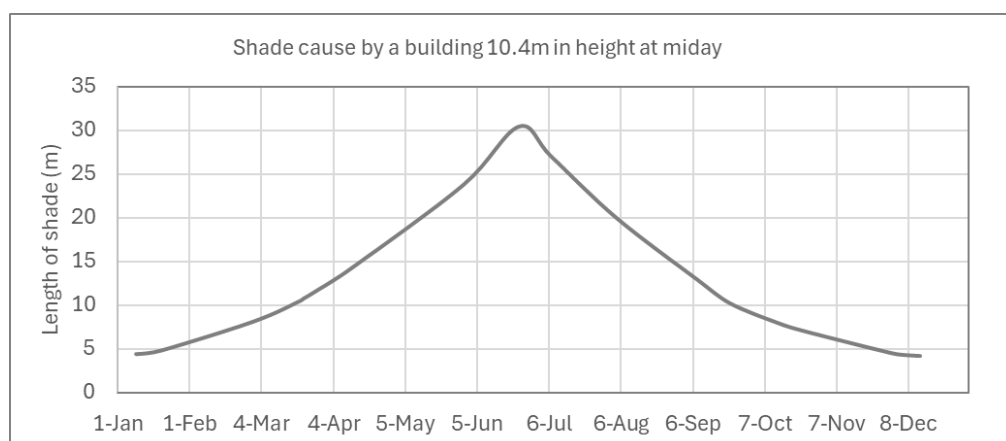
Between mid March to mid September (6 months) the shade angle is 45 degrees or less.  
Between late April and early August (3.5 months) the shade angle is 30 degrees or less.

As this is not the “maximum shade” I also undertook a series of measurements on 26 April 2025. The angle was greater at times of the day after the “perpendicular” angle in the previous graph, which results in less shadow, however the sun then is effected by the southern boundary, resulting in large shadows from the opposite direction.



In Late April, the sun is lower than 30 degrees in either the northern or western boundary for five hours of the day, noting that before 10am the sun has not really warmed the air and after 3pm the sun is cooling down.

48. The building envelope (4m at the boundary and 60 degrees) results in a possible building 5.6m in height 1m from a boundary, or 10.4m in height 4m from a boundary. A vertical height of 10.4m will create shade over a 3m length in summer and a 30m length in winter. If the adjoining property has a house 4m from their boundary, the house I be in the shade between early March to mid October, around seven months of the year. I consider that this contradicts HRZ-P12.2 and HRZ-P12.3.



Another way of viewing the sunlight planes and the effects of the new standards on adjacent properties is by comparing the previous rules to the proposed rules. Previously the recession planes at the boundary were 2.5m and 45° which has been changed to 4.0m and 60°. The

diagram below is based on an existing building on Cuba Street that was built on the previous standards. The red lines are the recession planes for high and medium density housing. The orange lines show the level of shading that will occur under these rules for SIX MONTHS of the year. The purple lines show the level of shading that will occur for these rules for over THREE MONTHS of the year.



The shading areas shown above have a devastating effect on neighbouring properties. Yet HRZ-P12.2 and HRZ-P12.3 infer that the adjacent sites are not adversely affected by the recession planes.

The shading shown above are based on the mid day sun, but as the sun sets, these areas of shade will occur from the rear boundary also. These recession planes set by the Government should never be allowed to be breached. Any building outside of these recession planes must be *prohibited*.

49. For living organisms to survive, they need sunlight. A neighbour recently mentioned that her lemon tree has produced no fruit as it is located in the shade for 8 months of the year. I know that my back lawn often dies in winter due to the shade that my garage puts on it continually during the winter months. Humans are no different. We need sunlight. Sunlight is known to change the mood of people and it is the only natural source of Vitamin D. Residents in northern European countries that have long winters rely on Vitamin D tablets as they do not get enough sunlight. This should not occur in New Zealand.

I also find it ironic that the City Centre Zone has minimum sunlight requirements (CCZ-S1) where sunlight must be provided to 70% of the frontage for 4 hours a day. This is better than the minimum sunlight requirements for residential zones.

50. As such, if the Standards are not met, I believe the activity should be *Prohibited*. The existing rules, set by the Government, will adversely affect neighbouring properties, hence they should not be allowed to be breached at all. No mitigation can reduce the adverse effects of taller buildings.

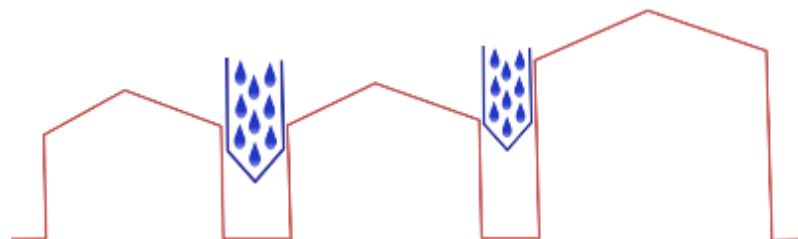
51. There are specific outlook standards so that homes have windows with natural daylight. However, these are only 1m for non-living areas such as bedrooms. I believe these are not enough for a standard of living that most New Zealanders aspire to. The outlook standards are similar to slums. The Principal Living Room requirement for a depth of 4m is still less than adequate, but manageable. However, there is nothing that stops an adjacent site building something that blocks existing outlook space. i.e. an existing building can have an outlook of 4m but then have another building on an adjacent property built within that 4m outlook space.
52. Recently I took this photo of offices in Lambton Quay, Wellington. These building provide more outlook space than the proposed living areas.
53. For these reasons, I consider the outlook areas to be inadequate for a standard of living that New Zealanders expect, and should be increased. Refer to my suggested addition to HRZ-P12.
54. According to the definition of Papakainga, only housing and ancillary activities (including social, cultural, educational, recreational, and commercial activities) for tangata whenua on their ancestral land is allowed. Therefore, all possible commercial activities that the rules allow for should not be allowed, or at the very least be the same as the other residential standards. Compliance to noise rules should be included here also if non-residential activities are allowed.
55. The Transport Policies include encouraging mode shift and reducing reliance on private cars. As such, the allowance of home businesses within residential zones contradicts this. People working from home, or being a sole operator is acceptable, but employing people within the home will increase car trips as public transport services generally focus on getting people to and from commercial areas, not to residential areas. It will also add on street parking to some already congested streets. As such, I consider that the rules for home businesses should be more stringent with less employees and no retail sales, including online retail (due to increased courier trips). For similar reasons to the above, rules for visitor accommodation and supported residential facilities should be more stringent.
56. I note that Health Care Activities is separated out, and that no more than 4 staff can be present at any time. I assume this is due to patients that they see, and the additional parking and trips associated. For example, a health care practitioner with 20 minute appointments will have 3 appointments an hour and generate 6 vehicle trips an hour. Due to clients overlapping, each practitioner could have 3 cars associated with them (their own, and 2 customers), each needing to be accommodated either on site or on the adjacent road. Other activities that work on appointments, such as hairdressers, is the same. I consider that any business based on appointments should not be allowed in a residential zone. At the least it should be discretionary.



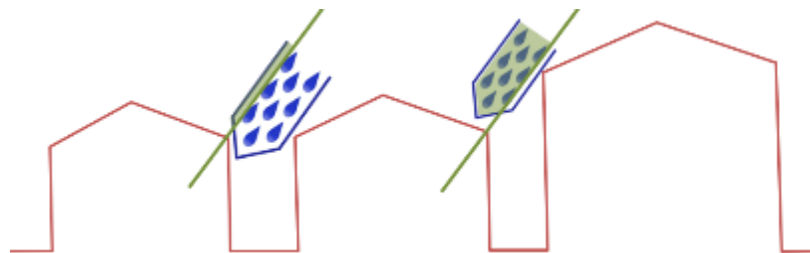


57. Cafes and restaurants should also not be allowed in a residential zone due to trip generation and parking demands.
58. Educational facilities generally situated on land that is designated for Ministry of Education purposes. I consider that this should remain. However HRZ-R12 effectively allows a new school with no restrictions on children numbers can operate in any residential location. This greatly affects the amenity of an area with parent drop off / pick ups and older children parking in the surrounding schools. A zone change should be required for a new school, which is publicly notified due to the adverse effects on the adjacent properties.
59. Emergency service facilities operate 24/7 and as such can cause noise issues within a residential area due to sirens on cars etc. I am aware that residents living close to the Hospital have relocated due to these adverse effects.
60. I agree with HRZ-S7 that at least 30 percent of the surface should be permeable, but I have seen breaches of this existing standard that Council has provided consent. This rule requires strengthening.
61. During heavy rain periods, the stormwater system can reach capacity and be over loaded. Wellington Water even say that new developments need to be neutral on stormwater, ie they can not discharge additional water into the stormwater system. This means that they must “soak” the water within the available ground (permeable surface).
62. I am concerned that side yards can be used as part of the permeable surface formulae. As buildings are able to be constructed 2m apart, this means that the permeable surface is only available when the rain comes vertically, which is never the case I high rain scenarios. The diagram below best provides what I mean.

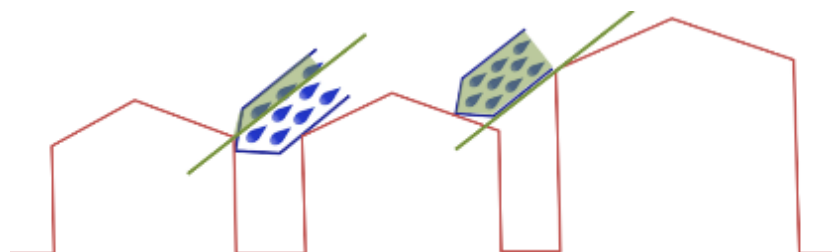
When no wind, side yards are able to absorb rain as it falls vertically.



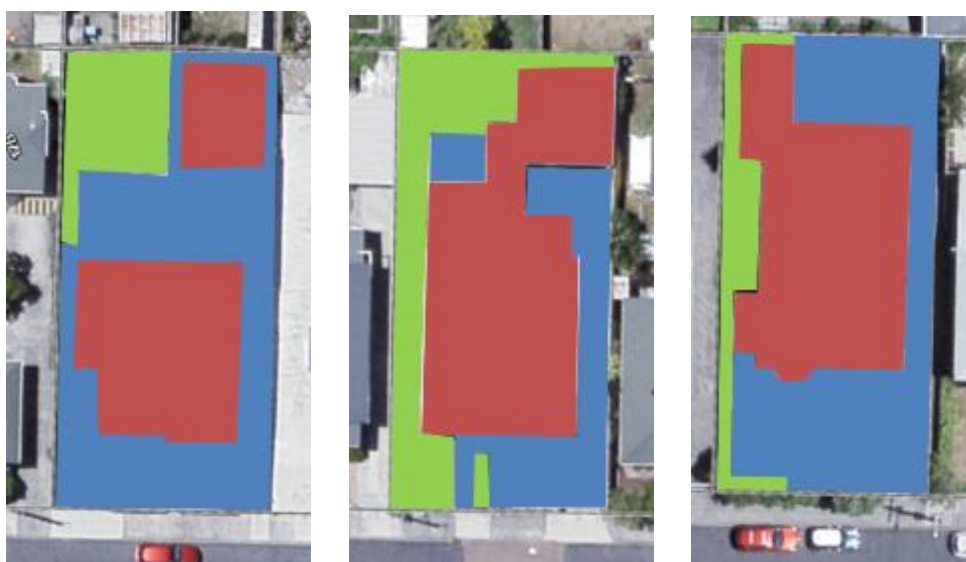
However, with wind, rain falls at an angle and amount of rain that can be absorbed by side yards reduces by the area shown in the green shading. The proportion of water that would be contributing to permeable surface that goes directly into the stormwater system is shown by the shaded green areas. As shown on the right, this effect is made worse with the increased building envelopes.



Depending on the pitch of the roof, height difference between buildings and the wind direction, there is a possibility that no rain will land on the side yards. The permeable surface is severely compromised.



63. Below are examples of consented developments in my street within recent years. I have covered the aerial photograph with different colours depicting the house, garage and covered decks (red) concrete surface (blue) and permeable surface (green). In order to mitigate the effects of these large expansive areas, Council has simply required that these properties have drains within their driveways, but all the drains lead to a stormwater system that will not cope in a large rain event, such as cyclone Gabrielle. Furthermore private drains in driveways require regular cleaning and maintenance which the property owner may not do. I believe the drain condition will not mitigate the lack of permeability in a storm event.



64. Not only does a breach of this standard need to have a prohibited status, but proximity to adjacent buildings needs to be considered. My research shows the angle of rain based on wind speed. During heavy rain events, there is normally heavy wind also, with average wind speeds of 35kph and gusts of 60 kph and over.

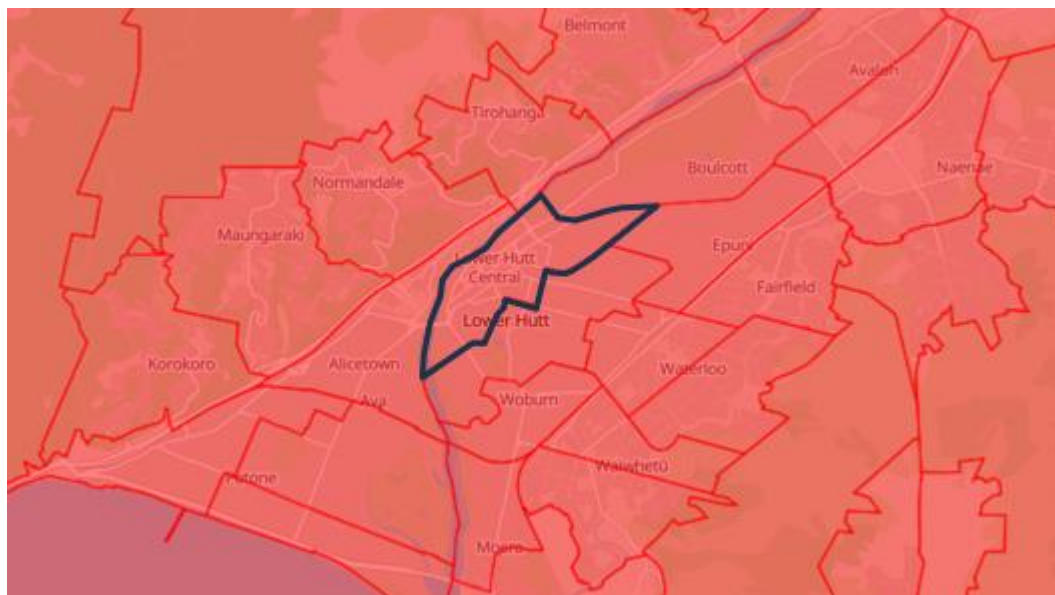
Wind Speed	6 m/s (22 kph)	10 m/s (36 kph)	14 m/s (50 kph)
Rain Angle	53 <sup>0</sup> +/- 11 <sup>0</sup>	68 <sup>0</sup> +/- 8 <sup>0</sup>	73 +/- 7 <sup>0</sup>

65. New Zealand Plumbing Codes use a rain angle of 63.4<sup>0</sup>
66. Most of the damage caused by Cyclone Gabrielle to buildings and homes in urban areas were due to reduced permeable surface. We must not let this happen in Lower Hutt.

## Commercial Zones

67. Hutt City Council is considering spending millions of ratepayers money to “enhance” the Hutt City Centre, and make it “thrive”. In my opinion, the reason the town centre is decaying is due to widespread employment and activities within other zones, changes in retail (online) and parking costs. Increasing the amount of land zoned for these commercial activities will worsen an already decaying town centre. I have not seen any evidence that we need to significantly increase the commercial land that is available in Lower Hutt.
68. A quick google search showed that the average business in New Zealand employs 4.3 people. The residential zones presently allow 4 people to work in a residential area. The google search also shows that 97 percent of businesses in New Zealand employ less than 20 people.

Based on the Census data<sup>8</sup>, the total number of people employed in the total of Lower Hutt City has increased by 41 percent between 2013 and 2023. However, for the Hutt Central area, highlighted below, the increase for the same period is only 5 percent. I believe this is due to increased employment outside of the central business district and the commercial sprawl I refer to in this section of my submission.



<sup>8</sup> <https://datafinder.stats.govt.nz/layer/111227-statistical-area-2-2023-generalised/>  
[https://explore.data.stats.govt.nz/?fs\[0\]=2023%20Census%20%7CTotals%20by%20topic%23CAT\\_TOTALS\\_BY\\_TOPIC%23&fs\[1\]=2023%20Census%20%7CWork%23CAT\\_WORK%23&fs\[2\]=Area%2C1%7CTotal%20-%20New%20Zealand%20by%20regional%20council%239999%23%7CWellington%20Region%2309%23&pg=0&fc=Area&snb=1](https://explore.data.stats.govt.nz/?fs[0]=2023%20Census%20%7CTotals%20by%20topic%23CAT_TOTALS_BY_TOPIC%23&fs[1]=2023%20Census%20%7CWork%23CAT_WORK%23&fs[2]=Area%2C1%7CTotal%20-%20New%20Zealand%20by%20regional%20council%239999%23%7CWellington%20Region%2309%23&pg=0&fc=Area&snb=1)

69. Since early 2020 there has been significant changes in the way people shop. Online shopping is becoming more and more popular, reducing the need for physical shops. I have seen several shops relocating to areas with cheaper rent and become a “warehouse” as most of their activity is online. Extending the space for retail will not improve this, and is likely to result in more empty shops in the traditional retail centres.
70. The introduction of paid parking in Jackson Street is already visible with less activity occurring. Retailers have commented on the downturn of customers. They stay shorter, buy only what they want, and leave without browsing for other potential items. With the additional commercial sprawl that the Proposed District plan is allowing, businesses will relocate to areas where parking is free, and create empty vacant shops and buildings in the areas that are traditionally the town centre. This is also evidenced with the malls, with people preferring to shop where there is free parking.
71. As mentioned under the Residential Zone, having similar activities together improves transport sustainable options, ie employment should be in employment zones and residential in residential zones. While I understand the argument that mixed use zones allow residential in commercial zones enables people to walk to their activity, but this is only if the activity is local. The commercial sprawl that the proposed plan allows effectively means that commercial is allowed almost anywhere in the valley floor. This will have a detrimental effect on both the CBD, Petone and to an extent the suburban centres in Wainuiomata, Stokes Valley etc.

In the example below, if a resident wanted to visit three businesses (blue stars) starting at their home (red star) and they were not close together, they would need to make 4 long trips and are unlikely to do this on public transport.



If the businesses were closer together a resident could walk between them and have more transport options (bus, cycle) to get to and from the main commercial hub.





As public transport is most efficient between areas of dense activity, such as to or from a town centre, the proposed increase and spread of commercial activity in the Proposed Plan will not make public transport a viable option for travel. As a transport Planner, I consider that commercial sprawl will increase the use of private cars for transport contradicting the transport policies

72. When reading the rules of the five different commercial centres, they are all effectively the same. The same activities are permitted, they basically have the same rules and standards. The only difference is the overlays, eg Active Street Frontage Overlay, and the reference to activities that are sensitive to private intrusion. Excluding the City Centre Zone, all the other zones have height restrictions based on the adjacent zone, which the majority is High Density Residential, i.e. 22m. While MCZ-R28 mentions a distance to a residential zone, as the MCZ zone is ribbon development, the majority is within 40m of residential.
73. I strongly recommend that the commercial zones are reduced in number (from five to one and continue the use of overlays) and that the commercial zones are reduced in size (retain the existing boundaries to stop commercial sprawl and potentially enhance the decay of the city centre). I also strongly recommend that the individual properties zoned commercial are re zoned to the adjacent zone (refer paragraph 44).

## Transport

74. I fully support the Highly Constrained Roads sections as there are many roads in Lower Hutt that can not support further development, however I was surprised when I saw the how sparse the areas covered by this overlay were.
75. When a road (kerb to kerb) is less than 10m in width, parking on both sides of the road reduces the road to a single lane, two-way road. Vehicles need to pass each other at driveway locations. Many of the streets in Petone are less than 10m in width, with significant on street parking due to the proximity to a commercial area.
76. The photos below are taken 250 m from Jackson Street. As you can see, both sides of the road have on street parking, and the road is too narrow for two vehicles to pass. This is a common

occurrence on many of the older, narrow streets that come off Jackson Street. It should also be noted that trucks use the side roads to Jackson Street in Petone for access to servicing



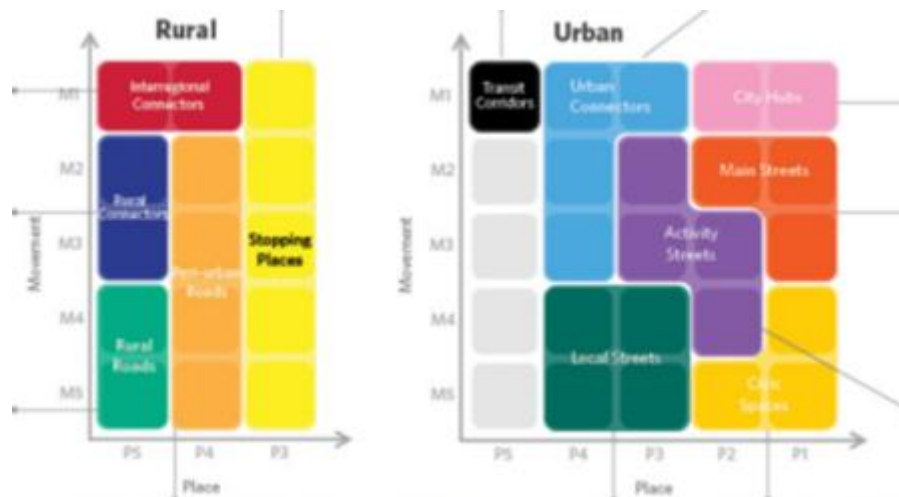
77. Table 3.2 in NZS4404:2010: Standard for Subdivision and Land Development, allows roads to be 9m wide for less than 20 houses, this standard is for areas wholly within residential and not adjacent to high parking areas, and it was also prior to the removal of minimum parking standards<sup>9</sup>. Primary access to housing for 20 to 200 houses requires a kerb to kerb width of 15m.
78. The constrained roads overlay should not be restricted to just narrow roads in close proximity to a commercial zone, but also to narrow roads in close proximity to other high parking generators where the parking spills to adjacent streets, such as the hospital, train stations and education facilities.
79. I recommended that any street with a kerb to kerb distance of 10m or less that is located either within one of the zones in the table below, or is within the distance of one of the zones in the table below, is included in the Highly Constrained Roads Overlay.

Zone	Distance
City Centre Zone	500m
Metropolitan Centre Zone	250m
Local Centre Zone	100m
Neighbourhood Zone	100m
Mixed Use Zone	50m
Sport and Active Recreation Zone	100m
Hospital Zone	200m
Tertiary Education Zone	200m
Transport Hub (e.g. Railway Station)	500m

80. TR-R4 states that no more than one residential unit can occupy a site in order to meet Policy TR-P6 (maintain exiting capacities on highly constrained roads). However, there is no limit to the size of the residential unit. Bigger houses can be built, with more bedrooms resulting in more vehicle trips. This rule needs to be strengthened.
81. The Transport and Infrastructure sections include references to a road classification, however these are not defined within the Plan. The classification names however are used in the NZTA One Network Framework (ONF), and I suspect that these are the same.

<sup>9</sup> The National Policy Statement for Urban Design removed all minimum parking supply requirements

82. The ONF is based on both movement function of the road and adjacent land use. There are five Rural and seven urban classifications. TR-S5 only refers to three of these classifications, therefore there is classification priority for the other roads. TR-S6 mentions ten of the 12 road classifications.

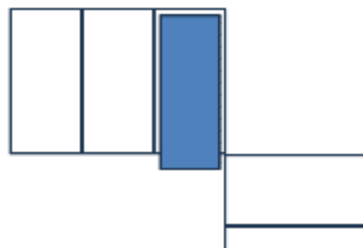


83. The ONF is a fluid document and can be altered by Council staff therefore the rules for a property that is based on the adjacent road classification can be altered at the whim of a Council Officer. Within my role as Transport Planner for Marlborough Roads, I can, and I have, altered the ONF within Marlborough when I have found discrepancies. Therefore a “fixed” road hierarchy needs to be in the District Plan. Furthermore, the Lower Hutt ONF has not been consulted on.
84. When I contacted the Council Planning Officer dealing with the Proposed Plan, he sent me a link to the Lower Hutt ONF<sup>10</sup>. I was surprised to see that some of the narrow roads in Petone are classified as Urban Connectors (affectively an arterial road). As such I will be contacting the Council Transport Team to ensure the road classifications meet the NZTA definitions. As such, the existing map is likely to change.

<sup>10</sup> <https://maps.huttcity.govt.nz/portal/apps/mapviewer/index.html?layers=664f7649579f4e9389782dad223fa11c>



85. The New Zealand Parking Standard NZS2890.1 is in the process of being reviewed. As part of the update, the New Zealand vehicle fleet has been reviewed. The New Zealand vehicle fleet is getting bigger. The 85<sup>th</sup> percentile vehicle is 1.9 x 4.9m and the 99<sup>th</sup> percentile vehicle is 2.1 x 5.4m.
86. Due to the larger vehicle fleet, the parking standards have changed, requiring 90 degree parking spaces to be marked 5.6m in length. The manoeuvre space has been reduced so that the overall parking bay size is approximately the same. For large carparking areas, it is important that a space is marked 5.6m due to the potential for corner spaces to be blocked. I have tried to demonstrate this below.



87. The advisors to the New Zealand Standards have also recommended that accesses and driveways are designed to accommodate a 99<sup>th</sup> percentile vehicle, while the parking bays can be designed to accommodate an 85<sup>th</sup> percentile vehicle. I consider this to be sound advice.
88. If a driveway is designed to only accommodate an 85<sup>th</sup> percentile vehicle (TR-S10) then conflict will occur, and any corners may not be able to be driven over by larger vehicles.
89. Vehicles often park in front of a garage, on a driveway, so if a garage is not on the boundary, the minimum distance between a property boundary and a garage must be a least 5.4m. It is recommended to make this at least 5.6m. If it is less than this, then a vehicle could park on road reserve, and potentially block pedestrian footpath, as shown below.





## Heritage Precincts

90. The Hutt City Council web site showcases the Petone Settlers Museum and states that the museum “*collect, care for and share our social history*”, however this vision does not appear to be reflected in the Proposed District Plan.
91. The Hutt City Council website also includes the Petone 2040 Spatial Plan and states “Petone is a unique fusion of heritage buildings, character housing, cafes and restaurants, specialist retail, large format shopping and industry, through to coastal environments.”
92. The Petone 2040 Spatial Plan states “*identification of particularly cohesive residential streets that have remained relatively intact since they were first laid down in the late 1800s and early to mid 1900s. These areas provide significant townscape value for Petone, establishing its identity as one of the earliest settled parts of the Wellington Region. It is proposed that the areas specifically identified has having a ‘Constant’ or ‘Critical’ townscape sensitivity and quality should be identified for special protection within the District Plan. The diagram at Figure 2.1.5 therefore proposes an additional layer to the DP List that identifies traditional housing that is cohesive and intact and which forms the majority of Petone’s heritage.*”
93. While the Hutt City Council web page refers to the spatial plan and the cohesive and intact traditional housing, this has not been reflected in the Proposed District Plan. Figure 2.1.5 of the Petone 2040 Spatial Plan is repeated overpage with the shaded areas being identified as areas of cohesive and intact traditional housing.

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the rules and thought they were as strict as the Heritage Precincts on Patrick Street where all alterations require consent (now called Heritage Areas).

101. For example, a renovations such as the one below is allowed as it retains the street frontage.



102. I recommend reintroducing the Petone Foreshore Heritage Precinct that was removed by the Commissioners in PC56.

## Financial Contributions

103. The provisions for additional housing in high and medium density environments will require significant upgrades in infrastructure. Many of the areas within Lower Hutt will need 3 waters upgrades and improved transport systems.

104. Are the authors of the District Plan aware of the proposed new Development Levy System<sup>11</sup> and will replace Development Contributions? Prior to finalising of the Proposed District Plan, the impact of this needs to be considered.

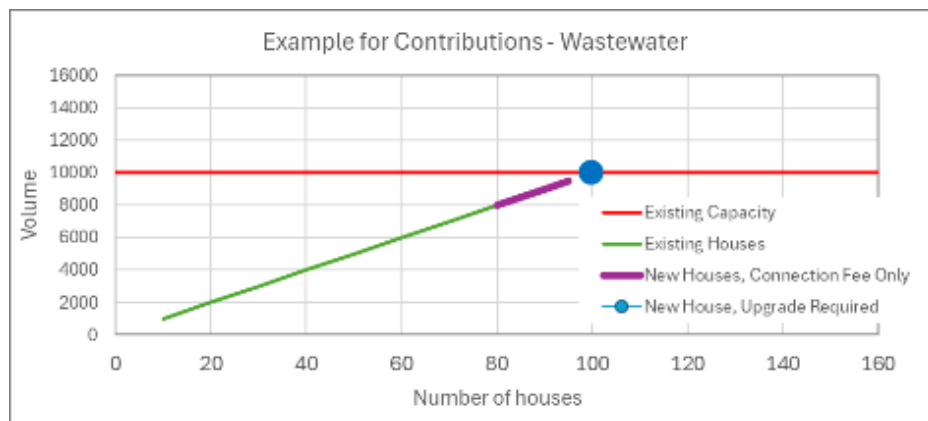
105. While the objective FC-O1 states that development contributes towards the costs of upgrading or providing services, I do not believe FC-Table 1 acknowledges this. FC-Table 1 is closely linked to the Development Contributions Policy<sup>12</sup>. It is not clear what upgrades are already covered by the Policy.

106. For example, assuming that wastewater requirements is uniform, houses that have been built prior to 2025 have followed the green line below in their usage, and are under the infrastructure capacity (red line). New houses moving forward (purple line) are only required to pay the connection fee, until the capacity is reached. The next house built (blue dot), is then required to pay for an upgrade. I believe the cost of upgrade should be shared by the new houses (purple).

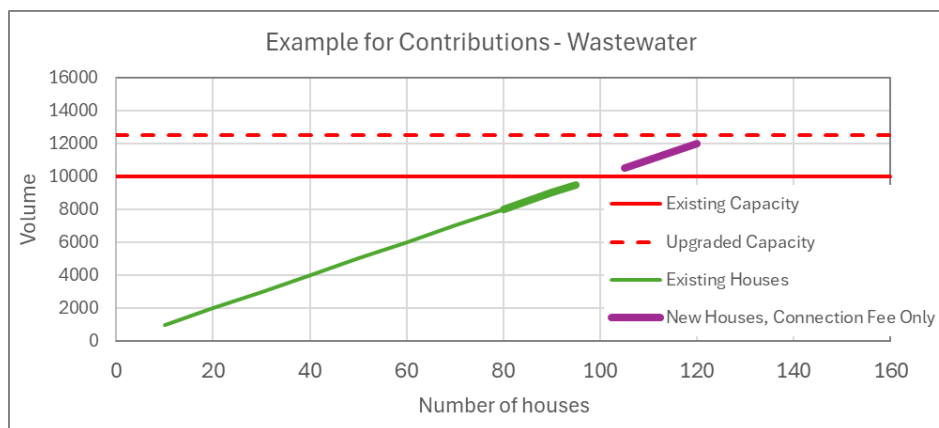
<sup>11</sup> <https://www.beehive.govt.nz/speech/going-housing-growth-new-and-improved-infrastructure-funding-and-financing>

<sup>12</sup>

[https://hccpublicdocs.azurewebsites.net/api/download/587890ba7b2542ef8532867346c3a343/\\_extcomms/74d6927e5579f6444929b8f52caa1991aa70](https://hccpublicdocs.azurewebsites.net/api/download/587890ba7b2542ef8532867346c3a343/_extcomms/74d6927e5579f6444929b8f52caa1991aa70)



107. It is also not clear the extent of the upgrade, for example does the upgraded capacity only cover that house, or does it raise the line as per the dotted line. In which case, do additional houses contribute to the upgrade, or just the connection fee?



108. I do not know if the development contributions already cover this, however I have made a suggested edit to the FC – Table 1.

109. I am also aware of improvements needed to our water treatment plants and this will be greater with the new provisions, yet FC-Table 1 does not include such financial contributions.

110. I am also aware that developers are likely to try and not contribute towards an upgrade, particularly if Wellington Water is proposing an upgrade in, say, 5 years time. They will use all the matters for consideration to try and not pay for upgrades above the Development Contribution Policy, and Council could instead increase the contributions required, which is outside of the District Plan.

## Noise

111. I read the Noise Section in the Plan to see how the noise hours related to the Commercial zone activities. I then realised that the Noise section could be significantly simplified.

112. The Noise section has a one to one correlation between rules and standards (not a many to one or one to many) and also a one to one relationship between the standards and the appendices. The Section could be simplified if each rule included the relevant standard and appendix.

113. The introduction also refers to the two New Zealand noise standards, yet then repeats this in every rule.
114. NOISE-R5 can not be monitored within the RMA, so should be deleted. Similar with NOISE-R9.
115. The noise standards vary for commercial and residential, however with the proposed rules, residential can be within commercial areas (not just mixed use) and commercial within residential, therefore I believe these rules should be more even and general and less zone specific and only time specific. Also the hospital has significant number of patients trying to sleep at night time so these “residents” should be able to have the same noise standards as the residential zones.
116. Presently construction (and associated noise) can occur from 7:30am on a weekday. The proposed plan allows this to start at 6:30am. This is far too early. I had neighbours renovating their house with commercial builders that turned up at 7:30 every morning. They worked on the house every day for 15 months. By the time the house was completed I was extremely stressed and I had counselling (paid by my employer as they could see the change in me). The intensification rules will result in long construction within residential zones and the adverse noise effects of this needs to be mitigated.





## Decisions Requested

*Note, wherever I have altered an activity status from Restricted Discretionary to Discretionary, please alter the words from : “Matters of discretion are limited to:” to “Matters of discretion include but are not ~~are~~ limited to”.*

#	Chapter	Provision	Position	Reasons	Relief sought
1	Table of Contents	Coastal Environment	Neutral	Include Coastal Environment in the Table of Contents. Refer paragraph 28.	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 22.	Provide a definition of “1% Flood Annual Exceedance Probability level” and explain what this means in real terms in terms of height above sea level.
3	Definitions	Road Hierarchy	Neutral	The Transport Rules refer to a classification of roads, but these are not defined, nor is there a map showing these. Refer paragraph 81 to 84. Refer to Decision Request 8.	Provide definitions of the roads classifications used in the District Plan, noting that these appear to be similar to the NZTA One Network Framework.
4	Definitions	Temporary Activities	Oppose	This is used in the noise section but allows a resident to have a loud party. Consideration also required if this includes a band playing once at a venue, but a different band playing the following night.	Add: Does not include social gatherings in private homes.

#	Chapter	Provision	Position	Reasons	Relief sought																				
5	All	All	Neutral	Please use the correct legal names of suburbs in the District Plan. Please ensure consistency throughout the Plan.	<i>Document needs to be consistent. This example is in NH-P2 Metropolitan Centre Zone in <del>Pito One</del> <u>Petone</u> and Seaview Marina ...</i>																				
6	Maps	Overlay Boundaries	Neutral	Accuracy of the modelling used can not be as good as the Overlay boundaries suggest. Refer to paragraphs 38 to 43	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, ie north and south of Adelaide Street (and its extension).																				
7	Maps/Zoning	Individual properties with different zones	Oppose	Refer paragraph 67 to 73	Remove zones that only cover 3 properties or less. Make this the same zone as the adjacent zone.																				
8	Maps	Highly Constrained Roads Overlay	Oppose in Part	The number of Highly Constrained Roads needs to include narrow roads in close proximity to areas with high parking demands and no off street parking. Refer paragraph 74 to 79.	Include any roads that have a kerb to kerb width less than 11m, and are within the distances of the zones or transport hubs as per the following table: <table><tr><th>Zone</th><th>Distance</th></tr><tr><td>City Centre Zone</td><td>500m</td></tr><tr><td>Metropolitan Centre Zone</td><td>250m</td></tr><tr><td>Local Centre Zone</td><td>100m</td></tr><tr><td>Neighbourhood Zone</td><td>100m</td></tr><tr><td>Mixed Use Zone</td><td>50m</td></tr><tr><td>Sport and Active Recreation Zone</td><td>100m</td></tr><tr><td>Hospital Zone</td><td>200m</td></tr><tr><td>Tertiary Education Zone</td><td>200m</td></tr><tr><td>Transport Hub (e.g. Railway Station)</td><td>500m</td></tr></table>	Zone	Distance	City Centre Zone	500m	Metropolitan Centre Zone	250m	Local Centre Zone	100m	Neighbourhood Zone	100m	Mixed Use Zone	50m	Sport and Active Recreation Zone	100m	Hospital Zone	200m	Tertiary Education Zone	200m	Transport Hub (e.g. Railway Station)	500m
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9	Maps	Road Hierarchy	Neutral	The Transport Rules refer to a classification	Add a Road hierarchy to the Maps																				

#	Chapter	Provision	Position	Reasons	Relief sought
				of roads, but these are not defined, nor is there a map showing these. Refer paragraph 81 to 84. Refer to Decision Request 3.	
10	Maps	Active Street Frontage	Oppose in Part	The activities in the Active Frontage A is the same as the Activities in Active Frontage B, and therefore should be the same, ie "A"	Change the Street frontages for Active Frontage B to be Active Frontage A. Change the Street frontages for Active Frontage C to be Active Frontage B. Remove relevant rules for Active Frontage C.
11	Natural Hazards	Activity definitions	Neutral	Difficult to read if printed. Refer paragraph 19.	Different activities by their nature present different consequences to natural hazards. For the provisions in this chapter, activities are classified as: <ul style="list-style-type: none"> <li>• Activities most sensitive to natural hazards, <u>such as residential</u></li> <li>• Activities potentially sensitive to natural hazards, <u>such as commercial and industrial</u>, and</li> <li>• Activities least sensitive to natural hazards, <u>such as recreation facilities</u>.</li> </ul> <u>For a full list of activities in each category, refer to the definitions.</u>
12	Natural Hazards	NR-R9	Neutral	Inconsistent with other rules	Additions to existing buildings and structures that contain activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Flood Hazard Overlay



#	Chapter	Provision	Position	Reasons	Relief sought																
13	Overlays	Rules	Neutral	Easier to understand. Refer to paragraph 20 and 21.	<p><i>Required under each rule set – this is an example only</i></p> <p><b>Flood Hazard Overlays - Rules</b></p> <p><u>The following rules apply for Flood Hazard Overlays. The table below is intended to assist which rules are relevant based on the hazard level (low, medium high) and the activity classification</u></p> <table><tr><th></th><th>activities least sensitive to natural hazards</th><th>activities potentially sensitive to natural hazards</th><th>activities most sensitive to natural hazards</th></tr><tr><td>Low Flood Hazard Overlay</td><td>NH-R7 NH-R10</td><td>NH-R8 NH-R12</td><td>NH-R8 NH-R12</td></tr><tr><td>Medium Flood Hazard Overlay</td><td>NH-R7 NH-R11 NH-R14</td><td>NH-R9 NH-R13 NH-R14</td><td>NH-R9 NH-R13 NH-R14</td></tr><tr><td>High Flood Hazard Overlay</td><td>NH-R7 NH-R11 NH-R14</td><td>NH-R9 NH-R13 NH-R14</td><td>NH-R9 NH-R13 NH-R14</td></tr></table>		activities least sensitive to natural hazards	activities potentially sensitive to natural hazards	activities most sensitive to natural hazards	Low Flood Hazard Overlay	NH-R7 NH-R10	NH-R8 NH-R12	NH-R8 NH-R12	Medium Flood Hazard Overlay	NH-R7 NH-R11 NH-R14	NH-R9 NH-R13 NH-R14	NH-R9 NH-R13 NH-R14	High Flood Hazard Overlay	NH-R7 NH-R11 NH-R14	NH-R9 NH-R13 NH-R14	NH-R9 NH-R13 NH-R14
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High Flood Hazard Overlay	NH-R7 NH-R11 NH-R14	NH-R9 NH-R13 NH-R14	NH-R9 NH-R13 NH-R14																		
14	Natural Hazard	NH-P8	Neutral	Separate into three policies for Low, Medium and High Flood Overlays as difficult to read and some activity levels appear to overlap. References in the Rules will also need to be updated.	<p>Separate into three policies for Low, Medium and High Flood Overlays</p> <p>References in the Rules will also need to be updated.</p> <p>Only allow in activities most sensitive in Medium Flood Overlay if controlled</p> <p><i>Avoid</i> in activities most sensitive High Flood Overlay</p>																
15	Natural Hazard	NH-P9	Neutral	Separate into three policies for Low, Medium and High Flood Overlays as difficult to read and some activity levels appear to overlap. References in the Rules will also need to be updated.	<p>Separate into three policies for Low, Medium and High Flood Overlays</p> <p>References in the Rules will also need to be updated.</p> <p>Only allow in activities most sensitive in Medium Flood Overlay if controlled</p> <p><i>Avoid</i> in activities most sensitive High Flood Overlay</p>																

#	Chapter	Provision	Position	Reasons	Relief sought
16	Natural Hazard	NH-R8	Oppose	Areas within flood overlays should not be allowed to have concrete floors. Refer paragraph 22 to 23	1. Activity status: Permitted Where: a. When located within a Low Flood Hazard Overlay, the finished floor levels of the building are located above the 1% Flood Annual Exceedance Probability level, plus the height of the floor joists <del>or the base of the concrete floor slab</del> and an allowance for freeboard. b. concrete floor slabs are not used
17	Natural Hazard	NH-P11	Oppose	The ability for evacuation extends beyond those listed. All activities should be Restricted Discretionary. Refer paragraph 24 to 25	4. Provide for new building platforms, new buildings and structures and the conversion of existing buildings <del>for child care services, retirement villages, educational facilities, hospitals, emergency service facilities and health care facilities</del> within the Liquefaction Hazard Overlay where: a. It can be demonstrated that occupants will be able to evacuate safely following an earthquake that results in liquefaction of the local soil; b. It can be demonstrated that post disaster functionality can be maintained following an earthquake including having foundation designs designed by a certified engineer to prevent liquefaction induced deformation of the building, and c. For emergency service facilities, hospitals, and health care facilities it can be demonstrated that emergency vehicles will be able to service the impacted community by being able to enter and leave the site.
18	Natural Hazard	NH-R17	Oppose in part	The ability for evacuation extends beyond those listed. All activities should be Restricted Discretionary. Refer paragraph 24 to 25	1. Activity status: <del>Permitted</del> <del>Where:</del> <del>The new building is not for a child care service, retirement village, educational facility, emergency service facility or health care activity.</del> 2. Activity status: Restricted discretionary Where: <del>Compliance with the requirements of NH-R17.1 cannot be achieved.</del> Matters of discretion are restricted to: The relevant matters in NH-P11: Subdivision, Use and Development in the Liquefaction Hazard Overlay.

#	Chapter	Provision	Position	Reasons	Relief sought
19	Coastal Hazard	Rules / Maps	Neutral	<p>There are several definitions and several overlap and include other definitions, such as Medium Coastal Hazard Overlay having the definition of Medium Tsunami Hazard Overlay and Medium Coastal Inundation Hazard Overlay. As such, it makes it incredibly difficult to ascertain what rule you need to check to see if your development is permitted or not. It is suggested that the overlays used are refined from seven (single and combined) to two. Refer paragraphs 30 to 34.</p>	<p>Merge the Coastal Hazard Overlays (single and merged) to the following, with the rules for the most restrictive rules in each area:</p> <ul style="list-style-type: none"> <li>• Medium Coastal Hazard Overlay (Low and Medium Tsunami Hazard Overlay and Medium Coastal Inundation Hazard Overlay)</li> <li>• High Coastal Hazard Overlay ( High Tsunami Hazard Overlay and High Coastal Inundation Hazard Overlay)</li> </ul>

#	Chapter	Provision	Position	Reasons	Relief sought
20	Coastal Hazard	Rules	Neutral	If the Commissioners do not agree to the Decision Request 19, above, then I strongly suggest that the merged Overlay grouped are separated and this section is treated in a similar manner to the Natural Hazard, including table at the start of the Rules section similar to that mentioned in Paragraph 20. Refer paragraph 30 to 34.	Remove the Coastal Hazard Overlays (merged from other Overlays) and maintain only the Overlays shown on the maps, eg. <ul style="list-style-type: none"> <li>• Low Tsunami Hazard Overlay</li> <li>• Medium Tsunami Hazard Overlay</li> <li>• High Tsunami Hazard Overlay</li> <li>• Medium Coastal Inundation Hazard Overlay, and</li> <li>• High Coastal Inundation Hazard Overlay</li> </ul> While this will lengthen the Chapter, it will make it easier to use. Also add a table at the start of the rules similar to that provided in Decision Request 13.
21	Coastal Hazard	CE-O3	Oppose in part	Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays. Refer paragraph 37.	Subdivision, use and development within the High Tsunami Hazard Overlay and High Coastal Inundation Hazard Overlay <del>reduce or</del> avoid increasing the existing risk from coastal hazards to people, buildings and infrastructure.
22	Coastal Hazard	CE-O4	Oppose in part	Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays. Refer paragraph 37.	Subdivision, use and development within the Low Tsunami Hazard Overlay, Medium Tsunami Hazard Overlay, and Medium Coastal Inundation Hazard Overlay <del>minimise</del> <u>reduce</u> the risk from natural hazards to people, buildings and infrastructure



#	Chapter	Provision	Position	Reasons	Relief sought
23	Coastal Hazard	CE-P9	Oppose in part	Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays. Refer paragraph 37.	Ensure, subdivision, use and development manages the coastal hazard risk to people, buildings and infrastructure by: 1. Avoiding <u>new</u> buildings and activities in the High Tsunami Hazard Overlay and High Coastal Inundation Hazard Overlay (with the exception of the General Industrial Zone and Heavy Industrial Zone in Seaview, Metropolitan Centre Zone in Petone and Seaview Marina Zone) <del>unless there is an operational need or functional need for the subdivision, use, or development to be located in this area and the subdivision, use, or development minimises the existing risk from coastal hazards to people, buildings and infrastructure.</del> 2. Within the General Industrial Zone and Heavy Industrial Zone in Seaview, Metropolitan Centre Zone in Petone and Seaview Marina Zone, recognise the regional importance of these areas, while ensuring that subdivision, use, or development located in these area minimises the risk from coastal hazards in the Medium and High Coastal Hazard Overlays to people, buildings, and infrastructure. 3. <u>Avoiding increased buildings and activities</u> <del>Requiring subdivision, use, or development to minimise the risk to development from coastal hazards to people, buildings and infrastructure in the Low and Medium Coastal Hazard Overlays;</del> and 4. Enabling use, or development that have either low occupancy or low replacement value within the Coastal Hazard Overlays.
24	Coastal Hazard	CE-P14	Oppose in part	Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays Refer paragraph 37  All the Low Tsunami Overlay areas are	Additions to existing buildings and structures in the Coastal Hazard Overlays are managed as follows: 1 Allow for additions to existing buildings and structures for activities least sensitive to natural hazards in all areas of the Coastal Hazard Overlays. <del>2 Allow for additions to existing buildings and structures containing activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Tsunami Hazard Overlay.</del> 3 Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards <del>or activities most</del>

#	Chapter	Provision	Position	Reasons	Relief sought
				<p>within the Medium Coastal Overlay, therefore point 2 is redundant. Refer paragraph 34.</p>	<p><del>sensitive to natural hazards</del> in the Medium Coastal Hazard Overlays and High Coastal Hazard Overlays where:</p> <p>a The addition is of limited size, b The addition enables the continued use of the existing building, c The addition incorporates measures that minimise the risk to people and buildings from coastal inundation from sea level rise, and d There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture <u>by means of walking</u>.</p> <p><del>4 Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards in the High Coastal Hazard Overlays where:</del></p> <p><del>a The addition enables the continued use of the existing building,</del> <del>b The addition incorporates measures that reduce or do not increase the risk to people and buildings from coastal inundation from sea level rise, and</del> <del>c There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</del></p> <p>5. <u>Do not</u> Only 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 Overlays where:</p> <p>a. The addition incorporates measures that reduce or do not increase the risk to people and buildings from the coastal hazard, and b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture</p>
25	Coastal Hazard	CE-P15	Oppose in part	Objectives and Rules are not strong enough to ensure lives are not endangered in the	<p>Subdivision, use and development in the Coastal Hazard Overlay are managed as follows:</p> <p>1. Allow for new buildings and structures, building platforms and the conversion of existing buildings for activities least sensitive to natural hazards in all areas of the Coastal Hazard Overlays.</p>

#	Chapter	Provision	Position	Reasons	Relief sought
				<p>Coastal Hazard Overlays. Refer paragraphs 37.</p> <p>All the Low Tsunami Overlay areas are within the Medium Coastal Overlay, therefore CE-P15.3 and CE-P15.7 is redundant. Refer paragraph 34.</p>	<p>2. Allow for the conversion of existing buildings containing activities potentially sensitive to natural hazards in all areas of the Coastal Hazard Overlays.</p> <p><del>3. Allow for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the Low Tsunami Hazard Overlay.</del></p> <p>4. Provide for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards <del>and activities most sensitive to natural hazards</del> in the Medium and High Coastal Hazard Overlays when located in the General Industrial Zone in Seaview, the Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone where:</p> <ul style="list-style-type: none"> <li>a. The building or structure does not exceed an appropriate gross floor area,</li> <li>b. The building or structure incorporates measures that minimise the risk to people and buildings from coastal hazards,</li> <li>c. If the building is a Major Hazardous Facility, measures that minimise the risk from the release of hazardous goods from a coastal hazard are incorporated into the design of the building or the storage of the hazardous goods,</li> <li>d. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture <u>by means of walking</u>, and</li> <li>e. The impact of any local government or central government planned climate change adaptation methods on the hazard susceptibility of the development has been considered.</li> </ul> <p>5. Provide for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the Medium Coastal Hazard Overlays in all other zones where:</p> <ul style="list-style-type: none"> <li>a. The new building incorporates measures that minimise the risk to people and buildings from the coastal hazard, and</li> </ul>

#	Chapter	Provision	Position	Reasons	Relief sought
					<p>b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture <u>by means of walking</u>.</p> <p>6. Only allow for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the High Coastal Hazard Overlays in all other zones where:</p> <p>a. The new building incorporates measures that reduce or do not increase the existing risk to people and buildings from the coastal hazard, and</p> <p>b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture.</p> <p><del>7. Provide for new buildings and structures, building platforms and the conversion of existing buildings containing activities most sensitive to natural hazards in the Low Tsunami Hazard Overlay where:</del></p> <p><del>a. The building will not be occupied by a sensitive activity with vulnerable residents or occupants; or more than three residential units on a site unless mitigation measures are incorporated into the development to minimise the risks to people and buildings from the coastal hazard.</del></p> <p>8. Only allow for new buildings and structures, building platforms and the conversion of existing buildings containing activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays in all other zones where:</p> <p>a. The new building <u>replaces an existing building and has the same or less footprint than building(s) that were on the site on 31 December 2024</u> incorporates measures that minimise the risk to people and buildings from the coastal hazard,</p> <p>b. The new development does not involve or require the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard, and</p>



#	Chapter	Provision	Position	Reasons	Relief sought
					<p>c. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture <u>by means of walking</u>.</p> <p>9. Avoid new buildings and structures, building platforms and the conversion of existing buildings containing activities most sensitive to natural hazards in the High Coastal Hazard Overlays in all zones (excluding the General Industrial Zone in Seaview, the Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone) unless:</p> <p>a. For activities that have an operational need and functional need to locate or occur within the High Coastal Hazard Overlays and locating or occurring outside these areas is not a practicable option:</p> <p>i. Mitigation measures are incorporated to minimise the risk of damage to buildings and loss of life to people associated with the activity, or</p> <p>b. For any other activities:</p> <p>i. The new building, building platform or conversion of the building does not increase the risk to life, or</p> <p>ii. The new building, building platform or conversion of the building incorporates measures that minimise the risk to people and buildings from the coastal hazard,</p> <p>iii. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture <u>by means of walking</u>,</p> <p>iv. The new building, or building platform does not involve or require the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard</p>
26	Coastal Hazard	CE-R9	Neutral	All the Low Tsunami Overlay areas are within the Medium Coastal Overlay,	<p><del>CE-R9</del></p> <p><del>Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Tsunami Hazard Overlay</del></p> <p><del>All Zones — Activity status: Permitted</del></p>

#	Chapter	Provision	Position	Reasons	Relief sought
				therefore CE-R9 is redundant. Refer paragraph 34.	
27	Coastal Hazard	CE-R10	Oppose	There should be no additions to buildings for activities most sensitive to natural hazards. Refer paragraph 37.	CE-R10 Additions to existing buildings and structures for activities potentially sensitive to natural hazards <del>and activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays</del>
28	Coastal Hazard	New Rule	Support	There should be no additions to buildings for activities most sensitive to natural hazards. Refer paragraph 37.	Additions to existing buildings and structures for activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays Prohibited
29	Coastal Hazard	CE-R12	Oppose	There should be no additions to buildings for activities most sensitive to natural hazards. Refer paragraph 37.	1. Activity status: <del>Discretionary Prohibited</del>
30	Coastal Hazard	CE-R15	Neutral	All the Low Tsunami Overlay areas are within the Medium Coastal Overlay, therefore CE-R15.1 is redundant. Refer paragraph 34.	All Zones <del>1. Activity status: Permitted</del> <del>Where:</del> <del>The new building or structure is located in a Low Tsunami Hazard Overlay.</del>
31	Coastal Hazard	CE-16	Oppose	There should be no new buildings for activities most	1. Activity status: Permitted Where: <del>a. The new building or structure or conversion of an existing building is located in a Low Tsunami Hazard Overlay, and</del>

#	Chapter	Provision	Position	Reasons	Relief sought
				<p>sensitive to natural hazards. Refer paragraphs 37.</p> <p>If CE-16.2 is updated as requested, CE-16.5 and CE-R16.6 are not needed.</p> <p>All the Low Tsunami Overlay areas are within the Medium Coastal Overlay, therefore CE-R16.1a is redundant. Refer paragraph 34.</p>	<p>b. The new building is not for a childcare service, retirement village, educational facility, hospital, emergency service facility or healthcare facility, and</p> <p>c. <del>The number of residential units on a site is no more than three.</del> new building <u>replaces an existing building and has the same or less footprint than building that was on the site on 31 December 2024</u></p> <p>2. Activity status: <del>Restricted discretionary</del> <u>Prohibited</u> Where: <del>The new building or structure or conversion of an existing building is located in a Low Tsunami Hazard Overlay, and</del> Compliance is not achieved with CE-R16.1.</p> <p>5. Activity status: <del>Discretionary</del> Where: <del>a. The new building or structure or conversion of an existing building is located in a Medium Coastal Hazard Overlay.</del></p> <p>6. Activity status: <del>Non-complying</del> Where: <del>The new building or structure or conversion of an existing building is located in a High Coastal Hazard Overlay.</del></p>
32	High/Medium Residential	HRZ-P12 MRZ-P12	Oppose	<p>Effects on adjacent sites not adequately catered for. Refer paragraph 47 to 49.</p>	<p>2. <del>Ensure adequate</del> <u>Provide minimum</u> access to daylight for residential activities on the site and on adjacent sites.</p> <p>3. <del>Ensure adequate</del> <u>Provide minimum</u> access to sunlight for existing outdoor living spaces on adjacent sites, and public open space.</p> <p>7. <u>Ensure the outlook requirements at existing adjacent dwellings are not impeded.</u></p>
33	High/Medium Residential	HRZ-R3 MRZ-R3	Oppose	<p>Effects on adjacent sites not adequately catered for. Refer paragraph 47 to 49.</p>	<p>Permitted</p> <p><u>1.b. Outlook space of an existing adjacent dwelling is not in accordance with HRZ-S9 for the adjacent site</u></p>

#	Chapter	Provision	Position	Reasons	Relief sought
34	High/Medium Residential	HRZ-R3 MRZ-R3	Oppose	Effects on adjacent sites are already adverse with existing rules, so these should <i>never</i> be breached. Refer paragraph 47 to 50.	2. Activity status: <del>Restricted discretionary</del> <u>Prohibited</u> Where: Compliance is not achieved with HRZ-R3.1.
35	High/Medium Residential	HRZ-R4 MRZ-R4	Oppose	Effects on adjacent sites are already adverse with existing rules, so these should <i>never</i> be breached. Refer paragraph 47 to 50.	2. Activity status: <del>Restricted discretionary</del> <u>Prohibited</u>
36	High/Medium Residential	HRZ-R5 MRZ-R5	Neutral	Provide definition in title for printed versions.	HRZ-R5 Papakāinga ( <u>housing and ancillary activities for tangata whenua on their ancestral land</u> ).
37	High/Medium Residential	HRZ-R5 MRZ-R5	Oppose	Permeable surface must be complied with in all activities.	g. Compliance is achieved with: i. HRZ-S8: Outdoor living space, <del>and</del> ii. <u>HRZ-S7: Permeable surface, and</u> iii. HRZ-S9: Outlook space. 2. Activity status: <del>Restricted</del> Discretionary
38	High/Medium Residential	HRZ-R6 MRZ-R6	Oppose	Rules not strict enough and conflict with Transport policies. Refer paragraph 55.	b. No more than <u>two</u> <del>four</del> people may work onsite at the home business at any one time. c. Retail activities are <u>not undertaken on site, including online retail limited to:</u> i. <del>Goods produced on the site, or</del> ii. <del>Goods retailed online and not resulting in customer visits to the site,</del> <del>or</del> iii. <del>Goods ancillary to a service provided by the home business.</del> 2. Activity status: <del>Restricted</del> Discretionary



#	Chapter	Provision	Position	Reasons	Relief sought
39	High/Medium Residential	HRZ-R7 MRZ-R7	Oppose	Rules not strict enough and conflict with Transport policies. Refer paragraph 55.	Where: The maximum occupancy, including staff and visitors, is limited to <u>five</u> <del>10</del> persons at any one time. 2. Activity status: <del>Restricted</del> Discretionary
40	High/Medium Residential	HRZ-R8 MRZ-R8	Oppose	Rules not strict enough and conflict with Transport policies. Refer paragraph 55.	2. Activity status: <del>Restricted</del> Discretionary
41	High/Medium Residential	HRZ-R9 MRZ-R9	Oppose	Rules not strict enough and conflict with Transport policies. Refer paragraph 55.	Where: a. The maximum number of people accommodated at the supported residential care facility, including staff and residents, does not exceed <u>five</u> <del>10</del> . 2. Activity status: <del>Restricted</del> Discretionary
42	High/Medium Residential	HRZ-R10 MRZ-R10	Oppose	Rules not strict enough and conflict with Transport policies. Refer paragraph 55.	2. Activity status: <del>Restricted</del> Discretionary
43	High/Medium Residential	HRZ-R10 MRZ-R10	Oppose	If kept as Restricted Discretionary (refer Decision Request 38 to 42), to minimise adverse effects on residential, I suggest the following changes. This should also be relocated to the end of the commercial activities.	a. The total gross floor area of the commercial activities does not exceed <u>100</u> <del>200</del> m <sup>2</sup> per site. d. The hours of operation are not outside: i. <del>7.00am to 9.00pm</del> <u>8.00am to 7.00pm</u> Monday to Friday, and ii. <del>8.00am to 7.00pm</del> <u>9.00am to 6.00pm</u> Saturday, Sunday, and public holidays. iii. <u>Closed public holidays</u> e. <u>No more than four staff may work on the premises at any one time.</u>
44	High/Medium Residential	HRZ-R11 MRZ-R11	Oppose	Covered under HRZ-R10 and MRZ-R10. Delete rule. Refer paragraph 56.	Delete entire Rule

#	Chapter	Provision	Position	Reasons	Relief sought
45	High/Medium Residential	HRZ-R12 MRZ-R12	Oppose	Effects on adjacent sites not adequately catered for. Refer paragraph 58.	1. Activity status: <del>Restricted discretionary</del> <u>Prohibited</u>
46	High/Medium Residential	HRZ-R16 MRZ-R16	Oppose	Effects on adjacent sites not adequately catered for. Refer paragraph 59.	Matters of discretion are limited to: 1. The effects on the residential amenity of the surrounding area, <u>including noise from sirens from emergency vehicles during the night.</u>
47	High/Medium Residential	HRZ-R21 MRZ-R21	Oppose	Effects on adjacent sites not adequately catered for.	<u>c. storage/work does not require truck movements</u> 2. Activity status: <del>Restricted</del> -Discretionary
48	High/Medium Residential	HRZ-S2 MRZ-S2	Oppose	Decks should be included as (a) they are often covered and (b) they are often covered at a later date. This effectively increases the roof area. Refer also to my concerns about permeable surfaces.	2. Does not apply to: <u>a. Decks less than 500mm in height,</u> <u>b. All structures less than 1.2 metres in height, and</u> c. Any scaffolding or falsework erected temporarily for construction or maintenance purposes.
49	High/Medium Residential	HRZ-S4 MRZ-S4	Oppose	Conflict with HRZ-S1 and MRZ-S1. Effects on adjacent sites are already adverse with existing rules, without increasing them for 4 units. The height plans should not be	<del>1. Where up to 3 residential units occupy the site:</del> <u>1. a. All buildings and structures must not project beyond a 60° recession plane measured from a point 4 metres vertically above ground level for all side and rear boundaries (as shown in the diagram HRZ-Figure 2).</u> <del>2. Where 4 or more residential units occupy the site:</del> <u>a. For the first 21.5m of a side boundary, as measured from the road frontage, buildings and structures must not project beyond a 60° recession plane measured from a point 8 metres vertically above ground level (as shown in the diagram HRZ-Figure 2), and</u>

#	Chapter	Provision	Position	Reasons	Relief sought
				increased when there are 4 or more units. Refer paragraph 47 to 50.	<del>b. For all other boundaries and the remainder of the side boundary, buildings and structures must not project beyond a 60° recession plane measured from a point 4 metres vertically above ground level (as shown in the diagram HRZ-Figure 2).</del>
50	High/Medium Residential	HRZ-S4 MRZ-S4	Oppose	Sunlight planes will affect houses on the opposite side of the road if the road reserve is narrow. Refer paragraph 47 to 50.	4. 1, 2 and 3 do not apply to: a. A boundary with a road <u>if the road reserve is more than 12m wide,</u>
51	High/Medium Residential	HRZ-S7 MRZ-S7	Oppose	Proximity to adjacent features will reduce the effectiveness of side yards for permeable surfaces. Refer to paragraph 60 to 66.	1.The minimum permeable surface area of a site is 30%. <u>Side yards between two adjacent buildings are excluded from this calculation.</u> Matters of discretion if the standard is breached: 1.The effects on the stormwater system. 2.The potential for increased surface ponding and flooding. 3.The mitigation of additional stormwater runoff through means such as onsite stormwater disposal or retention. <del>4.Any positive effects that cannot be achieved while meeting the standard.</del> <u>4. The height and proximity of other buildings, and the effect these have on rain direction with wind.</u>
52	High/Medium Residential	HRZ-S7 MRZ-S7	Oppose	If this standard is breached, it should be prohibited. Refer to paragraph 60 to 66.	<u>There are no matters for discretion. If the Standard is breached, the activity is prohibited.</u> <del>Matters of discretion if the standard is breached:</del> <del>1. The effects on the stormwater system.</del> <del>2.The potential for increased surface ponding and flooding.</del> <del>3.The mitigation of additional stormwater runoff through means such as onsite stormwater disposal or retention.</del> <del>4.Any positive effects that cannot be achieved while meeting the standard.</del>

#	Chapter	Provision	Position	Reasons	Relief sought
53	High/Medium Residential	HRZ-S8 MRZ-S8	Oppose	Implies that a unit above ground can have no balcony, patio or roof terrace	<p>1. A residential unit at ground floor level must have an outdoor living space that is at least 20 square metres and that comprises ground floor, balcony, patio, <u>and/or</u> roof terrace space that</p> <p>.....</p> <p>2.A residential unit located above ground floor level must have an outdoor living space in the form of a balcony, patio, <u>and/or</u> roof terrace that:</p> <p>a. Is at least 8 square metres and has a minimum dimension of 1.8 metres,</p> <p>b. Is accessible from the residential unit,</p> <p>c. <del>May be:</del></p> <p>i. <del>Grouped cumulatively by area in 1 communally accessible location, in which case it may be located at ground level, or</del></p> <p>ii. <del>Located directly adjacent to the unit.</del></p>
54	High/Medium Residential	HRZ-S9 MRZ-S9	Oppose	Effects on adjacent sites not adequately catered for. Refer paragraph 51 to 53.	<p>New clause</p> <p><u>2. Outlook space for residential units on adjacent sites must be maintained to a provide the minimum depth as shown in the diagram HRZ-Figure 3 for all windows on the adjacent site.</u></p>
55	High/Medium Residential Commercial	HRZ-S9 MRZ-S9 CCZ-S9 MCZ-S10 LCZ-S10 NCZ-S10 MUZ-S6	Oppose	As there are 1m setbacks, this change should not change anything but will strengthen the requirement for outlook space. Refer paragraph 51 to 53	<p>2.a. All other habitable rooms must have an outlook space with a minimum dimension of <del>1m</del> <u>2m</u> deep and 1m wide.</p>

#	Chapter	Provision	Position	Reasons	Relief sought
					<p>HRZ-Figure 3</p> <p>Outlook space per residential unit</p> <p>1m</p> <p>2m</p> <p>Outlook space</p> <p>Centre point of window</p> <p>Habitable room</p> <p>Principal living room</p> <p>Centre point of window</p> <p>4m</p> <p>4m</p>
56	Commercial	CCZ MCZ NCZ LCZ MUZ	Neutral	<p>The rules for these zones are all effectively the same as they rely only on the overlays to distinguish them. By consolidating them, it will simplify the Plan and make it easier to read.</p> <p>Refer paragraph 67 to 73</p>	Reduce the number of commercial zones from five to one.
57	Commercial	CCZ MCZ NCZ LCZ MUZ	Neutral	<p>An increase in commercial zone land will have a detrimental effect on the Lower Hutt CBD.</p> <p>Refer paragraph 67 to 73</p>	Retain the areas that are presently zoned Residential and are proposed to change to commercial.



#	Chapter	Provision	Position	Reasons	Relief sought
58	Commercial	CCZ MCZ NCZ LCZ MUZ	Neutral	Maintain the underlying zone if non residential activities occur in a residential zone. Refer paragraph 67 to 73	Change the zoning of individual properties within residential back to residential.
59	Commercial	CCZ-R16/R17	Neutral	Consolidate rules	Duplicate
60	Commercial	CCZ-R7 CCZ-R8 CCZ-R9 CCZ-R11	Neutral	CCZ-O1 states that the city centre is the primary commercial centre for Lower Hutt, yet the first land use activities in the list are all residential. Move to the end.	<i>Applies to all five commercial zones, only CCZ covered here</i>  Move CCZ-R7 CCZ-R8 CCZ-R9 CCZ-R11 to after CCZ-R19, light manufacturing
61	Commercial	CCZ-R16	Neutral	Any rule that includes a heading “not otherwise provided for” should be at the end of the activities, not in the middle.	<i>Applies to all five commercial zones, only CCZ covered here</i>  Move CCZ-R16 to after CCZ-R26
62	City Centre	CCZ-R27	Oppose	Outdoor Storage detracts from a thriving CBD	1.Activity status: <del>Permitted</del> <u>Non-complying</u> 2.Activity status: <del>Restricted discretionary</del> <u>Prohibited</u>
63	Commercial	CCZ-R28 MCZ-R28 NCZ-R23 LCZ-R23 MUZ-R28	Neutral	Needs checking as businesses in Petone can not have deliveries. MCZ-R28 conflicts with MUZ-R30 Hours are too long.	MCZ-R28 conflicts with MUZ-R30  a. <del>The servicing is not within 40 metres of a site in a Residential Zone, Mixed Use Zone, or Marae Zone, or</del> b. <del>The servicing occurs only between 7:00am and 10:00pm if the site is within 40 metres of a site in a Residential Zone, Mixed Use Zone, or Marae Zone</del>

#	Chapter	Provision	Position	Reasons	Relief sought
64	Heritage	All	Support	Refer paragraph 90 to 102.	Reinstate the Petone Foreshore Heritage Precinct as per the Council Officer Report in PC56.
65	Transport	TR-R3	Partial support	Effectively TR-R31.c.i increases the trip generating activities by 5%.	c. Alteration or expansion of an existing high trip generating activity does not: i. <del>Increase motor vehicle trip generation by greater than 5%,</del> ii. Alter, remove, or increase the number of, vehicle crossings which provide access to the activity, and iii. Remove the ability for vehicles to enter and exit the site in a forward direction.
66	Transport	TR-R4	Partial support	Rule TR-R4 needs to be strengthened. Refer Paragraph 74 to 80.	1. Activity status: Permitted Where: a. It is a residential activity and no more than one residential unit occupies the site, <u>and there is no increase in the number of bedrooms or rooms that can accommodate additional people on the site on 31 December 2024, or</u> b. It is a non-residential activity and is ancillary to an existing on-site activity. 2. Activity status: <del>Non-complying</del> <u>Prohibited</u> Where: Compliance is not achieved with TR-R4.1.
67	Transport	TR-S5	Partial Support	Include a minimum vehicle crossing requirement. If too narrow and a vehicle can not easily turn into the driveway, then the vehicle will need to do multiple turns and potentially block through traffic. This is undesirable,	<u>3. Vehicle crossings at the point of intersection with the kerb and channel must have a minimum width of</u> <u>a. For vehicle crossing on an urban road that is not an urban connector: 3.0m</u> <u>b. For a vehicle crossing on an Urban Connector: 3.5m</u> <u>4. Vehicle crossings at the point of intersection with any footpath or shared path must have a width not exceeding:</u> a. For single vehicle crossings: 6m, and b. For combined vehicle crossings: 9m

#	Chapter	Provision	Position	Reasons	Relief sought
				particularly on Urban Connectors.	
68	Transport	TR-S7	Partial Support	Access must be able to accommodate all vehicles. Refer to paragraph 85 to 88.	1. The minimum design vehicle used for driveway design under this standard is a <u>5.4m x 2.1m 4.91m x 1.87m</u> vehicle ( <u>99</u> 85th percentile vehicle).
69	Transport	TR-S8	Neutral	Consistent wording needed. Motor vehicle includes trailers and mobility scooters TR-S9 and TR-S10 deal with truck parking (loading)	Design requirements for <del>motor vehicle</del> <u>car</u> parking, circulation, and manoeuvring
70	Transport	TR-S8	Oppose	A residential site that meets all the required standards should not need a resource consent if they do not have electric vehicle charging.  Turntables are acceptable in small carparks. They enable better manoeuvring.	2. Carparking spaces must: a. Comply with the minimum dimensions of Figure 3: Motor vehicle parking and Table 5: Design requirements for motor vehicle parking, b. Have a maximum gradient of 5% in any direction, c. Have a minimum height clearance of 2.3m, and <del>d. For residential on-site carparking spaces, whether covered or uncovered, be electric vehicle charging ready by being serviced with an electrical cable conduit from the electricity supply to the edge of the carpark</del>  5. On-site parking, circulation and manoeuvring must not include ramps, <del>turntables</del> , lifts or stackers 6. <u>Manoeuvring space must not be obstructed by any parking or loading space, or any other permanent object.</u>
71	Transport	Table 4	Partial support	Cars park in front of garages, so must be clear for at least 1 car length. Refer paragraph 89.	The traffic lane must have a minimum length of 6m extending into the site from the property frontage, which must be unobstructed <del>but may be enclosed by a garage or a carport.</del> <u>unless a garage or carport is constructed on the boundary.</u>

#	Chapter	Provision	Position	Reasons	Relief sought
72	Transport	Table 5 and Figure 3	Partial Support	Update to meet the NZS2890.1 update. Refer to paragraph 85 to 88. Refer Appendix A	Update to meet the NZS2890.1 update. Change “b” in “Parallel” and “perpendicular” to “a” to be consistent with “Angle”. Clarify that “Minimum aisle width” = manoeuvring (refer TR-S8.4 etc) Simplify the table. Refer Appendix A
73	Transport	Figure 3	Neutral	Consistent title needed	Figure 3 – <del>Motor vehicle</del> Car parking
74	Infrastructure	INF-S13	Oppose in part	Road signs, such as give way, and direction signs should be exempt, noting that some directional signs installed by Council will be larger than 3m <sup>2</sup> .	1. Signs are exempt from this standard if they are located on a site and are not visible beyond the site on which they are located. <u>2. Signs are exempt from this standard if they are erected by Hutt City Council in their role as the local Road Control Authority in accordance with the requirements of the Traffic Control Devices Manual.</u> <u>3 2. All signs associated with construction, maintenance and repair, or upgrading of infrastructure must</u>
75	Subdivision	SUB-R13	Oppose in part	Make consistent with SUB-R14.	1. Activity status: Controlled Where: a. The subdivision will result in building platforms for activities <del>most sensitive activities least sensitive to natural hazards or activities potentially sensitive to natural hazards</del> to natural hazards located within the Liquefaction Hazard Overlay <u>2. Activity status: Restricted discretionary</u> Where: a. The subdivision will result in building platforms for activities <del>most sensitive to natural hazards located within the Liquefaction Hazard Overlay</del>
76	Subdivision	SUB-R18	Oppose	Standards for Activities Most Sensitive to Natural Hazard too low.	4. Activity status: <del>Discretionary</del> Non-complying
77	Subdivision	SUB-R19	Oppose	Standards for Activities Most Sensitive to Natural Hazard too low.	3. Activity status: <del>Non-complying</del> Prohibited

#	Chapter	Provision	Position	Reasons	Relief sought
78	Subdivision	SUB-R23	Oppose	Standards for Highly Constrained Roads too low. Consistent with TR-R4. Refer Paragraph 74 to 80.	1. Activity status: <del>Discretionary</del> <u>Prohibited</u>
79	Subdivision	SUB-S4	Neutral	Concerned that the relevant standard may alter. Government Changes to Three Waters may override the document referred to. Proposed wording may require tweaking.	1. Where a connection to a publicly owned reticulated water supply systems is available, all new allotments must: a. Be provided with a water supply connection at the allotment boundary, that meets the requirements of the <del>Wellington Water Regional Standard for Water Services December 2021 (Chapter 6, Tables 6.1 and 6.2)</del> , <u>relevant Water Board</u> and
80	Subdivision	SUB-S5	Neutral	Concerned that the relevant standard may alter. Government Changes to Three Waters may override the document referred to. Proposed wording may require tweaking.	1. Where a connection to a publicly owned reticulated wastewater systems is available, all new allotments must be provided with a connection at the allotment boundary that meets the requirements of the <del>Wellington Water Regional Standard for Water Services December 2021 (Chapter 5, section 5.2.3)</del> <u>relevant Water Board</u> . 2. Where a connection to a publicly owned reticulated wastewater systems is not available, all allotments must be provided with on-site wastewater systems or an approved alternative means to dispose of sewage in a sanitary manner within the net site area of the allotment in accordance with the <del>Wellington Water Regional Standard for Water Services December 2021 (Section 5.2.6)</del> <u>relevant Water Board</u> .
81	Subdivision	SUB-S6	Neutral	Concerned that the relevant standard may alter. Government Changes to Three Waters may	2. Where a connection to a publicly owned stormwater management systems is available, all new allotments must be provided with a connection at the allotment boundary, that meets the requirements of the <del>Wellington Water Regional Standard for Water Services December 2021 (Chapter 4 Stormwater, Tables 4.1, 4.2 and 4.3)</del> <u>relevant Water Board</u> .



#	Chapter	Provision	Position	Reasons	Relief sought
				override the document referred to. Proposed wording may require tweaking.	
82	Financial Contributions	FC-Table 1	Oppose in part	Refer to paragraph 105 to 110.  Relief sought is for Water supply, Stormwater Disposal and Wastewater disposal, only one example provided in "relief sought".	<ul style="list-style-type: none"> <li>Where an existing Council water is available, the cost of connection with the existing system.</li> <li>Where an existing Council water supply is available, but the capacity and pressure of the system is inadequate to meet the additional demand by the proposed subdivision or development, the costs of connection and proportion of capacity and pressure upgrading of the existing system to meet the additional generated demand</li> <li>Where the existing Council supply is not available, the cost of providing for the supply of water</li> </ul>
83	Noise	All	Neutral	NZS 6801:2008 and NZS6802:2008 is mentioned in the introduction, is it necessary to repeat it in every standard?	Remove excessive references to repeated use of NZS 6801:2008 and NZS6802:2008
84	Noise	NOISE-R1	Neutral	Easier to read and understand document. Refer paragraph 112.	Consolidate NOISE-R1, NOISE-S1 and NOISE-APP1 into a single rule in a single location.
85	Noise	NOISE-R2	Neutral	Easier to read and understand document. Refer paragraph 112.	Consolidate NOISE-R2, NOISE-S2 and NOISE-APP2 into a single rule in a single location.
86	Noise	NOISE-R3	Oppose	The definition of temporary activity is too ambiguous.	Delete NOISE-R3, NOISE-S3 and NOISE-APP3.  Refer also Decision Request 4.
87	Noise	NOISE-R3	Neutral	Easier to read and understand document.	If commissioners do not agree with Decision Request 86:

#	Chapter	Provision	Position	Reasons	Relief sought
				Refer paragraph 112.	Consolidate NOISE-R3, NOISE-S3 and NOISE-APP3 into a single rule in a single location.
88	Noise	NOISE-R4	Neutral	<p>Easier to read and understand document. Refer paragraph 112.</p> <p>Note, the error in NOISE-R4 highlights the difficulty in reading this section.</p>	<p>Consolidate NOISE-R4, NOISE-S4 and NOISE-APP4 into a single rule in a single location.</p> <p>Note, if commissioners do not agree, then the following error needs to be fixed:  1.Activity status: Permitted  Where:  Compliance is achieved with <del>NOISE-S3</del> <u>NOISE-S4</u>: Emission of noise from temporary activities.</p>
89	Noise	NOISE-R5	Neutral	Delete as this will be impossible to monitor. Also relates to vibration, not noise	Delete
90	Noise	NOISE-R6 NOISE-R7 MOISE-R8 NOISE-S5 NOISE-S6 MOISE-S7 NOISE-APP5 NOISE-APP6 NOISE-APP7	Neutral	Delete as this should all be contained in the Building Code. If not in the Building Code, it should be in the Council Code of Practice. Refer NZS4404:2010	Delete

#	Chapter	Provision	Position	Reasons	Relief sought						
91	NOISE	NOISE-R9	Neutral	There appears to be an error in the “zone” list in the left hand column. Hospitals can only use helicopter pads in “unforeseen circumstance” – this needs reconsidering. Is this rule really needed as the other rules regarding noise cover this.	Review rule in its entirety.						
92	Noise	NOISE-APP1	Oppose	With the allowance of residential in <u>all zones</u> , all the zones should have the noise restrictions at the boundary of the property.	Replace entire table with: <table><tr><th>Daytime Limit (7:00am - 7:00pm)</th><th>Evening Limit (7:00pm - 10:00pm)</th><th>Night Limit (10:00pm - 7:00am)</th></tr><tr><td>55 dB L<sub>Aeq</sub> (15min)</td><td>50 dB L<sub>Aeq</sub> (15min)</td><td>40 dB L<sub>Aeq</sub> (15min) 70 dB L<sub>AFmax</sub></td></tr></table>	Daytime Limit (7:00am - 7:00pm)	Evening Limit (7:00pm - 10:00pm)	Night Limit (10:00pm - 7:00am)	55 dB L <sub>Aeq</sub> (15min)	50 dB L <sub>Aeq</sub> (15min)	40 dB L <sub>Aeq</sub> (15min) 70 dB L <sub>AFmax</sub>
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55 dB L <sub>Aeq</sub> (15min)	50 dB L <sub>Aeq</sub> (15min)	40 dB L <sub>Aeq</sub> (15min) 70 dB L <sub>AFmax</sub>									

#	Chapter	Provision	Position	Reasons	Relief sought																																																																																																					
93	Noise	NOISE-APP2	Oppose	With the allowance of residential in all zones, all the zones should have the noise restrictions at the boundary of the property. Construction should NOT be allowed to start prior to 7:30am or after 6:00pm. Periods for “short”, “typical” and “long” needs to be shortened from 14 days, 14 days to 20 weeks and over 20 weeks to 3 days, 3 to 14 days and over 14 days respectively. Refer paragraph 116	<div>Replace entire table with:</div> <table><tr><th colspan="2" rowspan="2">Time period</th><th colspan="2">Short term work (1 days or less)</th><th colspan="2">Typical work (3 to 14 days)</th><th colspan="2">Long term work (more than 14 days)</th></tr><tr><th>dBA Leq</th><th>dBA Lmax</th><th>dBA Leq</th><th>dBA Lmax</th><th>dBA Leq</th><th>dBA Lmax</th></tr><tr><td rowspan="4">Weekdays</td><td>6:30am-7:30am</td><td colspan="6">Same Standard as NOISE APP1</td></tr><tr><td>7:30am-6:00pm</td><td>80</td><td>95</td><td>75</td><td>90</td><td>70</td><td>85</td></tr><tr><td>6:00pm-8:00pm</td><td colspan="6">Same Standard as NOISE APP1</td></tr><tr><td>8:00pm-6:30am (next day)</td><td colspan="6"></td></tr><tr><td rowspan="4">Saturday</td><td>6:30am-7:30am</td><td colspan="6"></td></tr><tr><td>7:30am-6:00pm</td><td>80</td><td>95</td><td>75</td><td>90</td><td>70</td><td>85</td></tr><tr><td>6:00pm-8:00pm</td><td colspan="6">Same Standard as NOISE APP1</td></tr><tr><td>8:00pm-6:30am (next day)</td><td colspan="6"></td></tr><tr><td rowspan="4">Sunday and Public Holidays</td><td>6:30am-7:30am</td><td colspan="6"></td></tr><tr><td>7:30am-6:00pm</td><td colspan="6"></td></tr><tr><td>6:00pm-8:00pm</td><td colspan="6"></td></tr><tr><td>8:00pm-6:30am (next day)</td><td colspan="6"></td></tr></table>	Time period		Short term work (1 days or less)		Typical work (3 to 14 days)		Long term work (more than 14 days)		dBA Leq	dBA Lmax	dBA Leq	dBA Lmax	dBA Leq	dBA Lmax	Weekdays	6:30am-7:30am	Same Standard as NOISE APP1						7:30am-6:00pm	80	95	75	90	70	85	6:00pm-8:00pm	Same Standard as NOISE APP1						8:00pm-6:30am (next day)							Saturday	6:30am-7:30am							7:30am-6:00pm	80	95	75	90	70	85	6:00pm-8:00pm	Same Standard as NOISE APP1						8:00pm-6:30am (next day)							Sunday and Public Holidays	6:30am-7:30am							7:30am-6:00pm							6:00pm-8:00pm							8:00pm-6:30am (next day)						
Time period		Short term work (1 days or less)		Typical work (3 to 14 days)				Long term work (more than 14 days)																																																																																																		
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94	Noise	NOISE-APP3	Neutral	With the allowance of residential in all zones, all the zones should have the noise restrictions at the boundary of the property. Appears to be inconsistent for commercial zones	<div>If commissioners do not agree with Decision Request 86:</div> <div>Can be simplified as all columns are the same for 7:00-19:00 and 19:00 to 22:00</div> <div>Receiving Zones need to be checked. Residential in Mixed Zone is different to residential zones.</div>																																																																																																					
95	Light	LIGHT-TABLE1	Neutral	Needed for ease of use Refer to SIGN-S9 also.	Please include the time periods for outside and during restricted lighting period																																																																																																					

#	Chapter	Provision	Position	Reasons	Relief sought
96	Signs	SIGN-R1	Neutral	SIGN-R1.1b is duplicate of SIGN-R1.d.vii	SIGN-R1.1 <del>b. The sign is an election sign and complies with SIGN-S7: Election signs, or</del>
97	Signs	SIGN-R3	Oppose	There are no positive effects of a digital sign	SIGN-R3.1 Matters of discretion are restricted to: <del>7. Any positive affects of the digital sign that can not be achieved with a sign other than a digital sign</del>
98	Signs	SIGN-S1	Oppose	Signs should be smaller in a residential zone unless it is temporary. Businesses requiring signs should not be permitted in residential zones.	1. No one sign may be larger than <del>2m<sup>2</sup></del> <u>1m<sup>2</sup></u>
99	Signs	SIGN-S1	Oppose	Hospital and Tertiary Education should be treated the same as Mixed use. Merge SIGNS-S1.4 and SIGNS-S1.5	7. No one sign may be larger than <del>5m<sup>2</sup></del> <u>4m<sup>2</sup></u>
100	Signs	SIGN-S2	Oppose	Signs should be smaller in a residential zone unless it is temporary Remove "official signs" from all zone descriptors.	1. The maximum total area of signs per site (other than <del>official signs</del> , temporary signs and election signs) is <del>2m<sup>2</sup></del> <u>1m<sup>2</sup></u> 2. The maximum total area of signs per site (other than <del>official signs</del> , temporary signs and election signs) is 20m <sup>2</sup> 3. 4. The maximum total area of signs per site (other than <del>official signs</del> , temporary signs and election signs) is 20m <sup>2</sup> 5. The maximum total area of signs per site (other than <del>official signs</del> , temporary signs and election signs) is 4m <sup>2</sup>
101	Signs	SIGN-S3	Oppose	Signs should be restricted in a	1. There must be no more than one sign per site ( <del>other than official signs and temporary signs</del> )

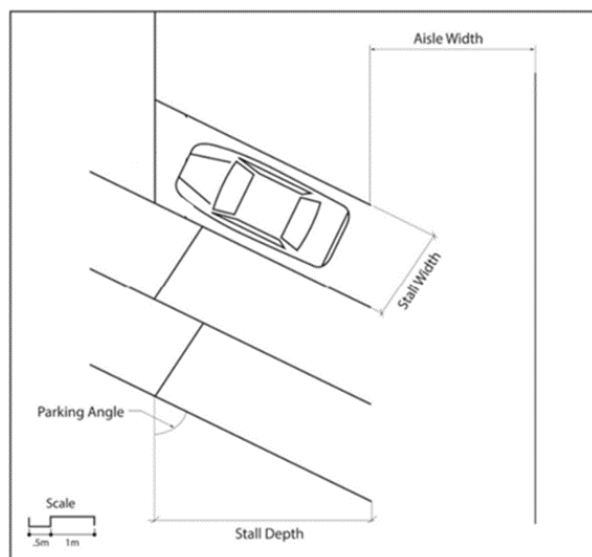


#	Chapter	Provision	Position	Reasons	Relief sought
				residential zone unless it is temporary. Businesses requiring signs should not be permitted in residential zones.	
102	Signs	SIGN-S3	Neutral/Oppose	Consistency between SIGN-S3.2 and SIGN-S3.3. Definition not required in the rule.	3. There must be no more than two signs per site frontage. <del>For corner sites, each side of the corner counts as a separate frontage.</del> 4. There must be no more than one sign per site frontage where that frontage is opposite a site in a Residential Zone, Rural Zone, Open Space and Recreation Zone, or the Marae Zone.
103	Signs	SIGN-S4	Oppose	Sign height too high. Distraction to motorists should not be seen from a residential zone. Merge SIGNS-S4.2 and SIGNS-S4.3	2. A freestanding sign must not exceed <del>10</del> 6 metres in height
104	Signs	SIGN-S5	Neutral	Standards the same.	Standard in first row for certain zones, and second row for remaining rows appears to be the same. This looks like an error.
105	Signs	SIGN-S5	Neutral	Clarify “if” not “where”	3. <del>Where signs</del> If signs are attached to a veranda ....
106	Signs	SIGNS-S7	Oppose	Election signs should be minimised. Add additional requirement	4. No more than one election sign per site.
107	Signs	SIGN-S8	Neutral	Please add pedestrian crossing for safety purposes	Signs must not obstruct the line of sight of any corner, bend, intersection, vehicle crossing, <u>pedestrian crossing</u> or railway crossing
108	Signs	SIGN-S9	Neutral	Standard mentions restricted lighting period, but LIGH-TABLE3 does not	Clarify this Standard and lighting periods

#	Chapter	Provision	Position	Reasons	Relief sought
				include any lighting periods.	
109	Signs	All Standards	Oppose	There are no positive effects of a sign	Matters of discretion if the standard is not met <del>X. Any Positive effects that can not be achieved while complying to this standard</del>
110					

## Appendix A – Carpark Dimensions

As 30° and 45° degree parking is inefficient and difficult for drivers to use, it is recommended that they are not included in the table, but a note added below. However, if they are to be retained in the table, suitable values have been included.



Parking Angle	Type of User <sup>1</sup>	Stall Width <sup>5</sup>	Stall Depth <sup>4</sup>	Aisle Width (manoeuvre space) <sup>6</sup>
90	Class 1	2.5	5.6	5.8
90	Class 2	2.6	5.6	5.8
90	Accessible Parking	3.6	5.6	5.8
0 (parallel)	Class 1	2.1	6.5 <sup>2</sup>	3.0 <sup>3</sup>
	Class 2	2.1	6.3 <sup>2</sup>	3.3 <sup>3</sup>
60	Class 1	2.5	6.1	4.6
60	Class 2	2.6	6.2	4.3
45 <sup>8</sup>	Class 1	2.5	5.8	3.7
45 <sup>8</sup>	Class 2	2.6	5.8	3.5
30 <sup>8</sup>	Class 1	2.4	5.0	2.9
30 <sup>8</sup>	Class 2	2.5	5.0	3.5

### Notes for Table:

- Class 1 is for medium to long term parking, such as employee parking. Class 2 is for short term parking, such as retail and commercial, and where good can be expected to be loaded into vehicles.
- The stall depth (length) is to be increased by 300mm where one side is obstructed by a wall or landscaping. If free on BOTH sides, the stall depth can be reduced to 5.6m.
- One way Aisle. For two way aisles, this needs to be doubled. Where the aisle is two-way, but parking is on one side only, the total aisle width shall be a minimum of 5.8 m.
- If a footpath is adjacent to the car park and vehicle overhang may obstruct part of the footpath, then either wheel stops are required, or the footpath width increased to ensure a minimum throughfare of 1.5m. Wheel stops are always required if the kerb height is less than 90mm or greater than 150mm.

5. The stall width shall be increased by 300mm if the parking space is adjacent to a wall.
6. Where there is angle parking on one side of an aisle only and the other side is confined by a wall or other high vertical obstruction, the aisle width shall be increased by 300 mm.
7. At blind aisles are only permitted for 90 degree parking. At blind aisles, the aisle and end parking space shall be extended a minimum of 1.0 m beyond the last parking space. In car parks open to the public, the maximum length of a blind aisle shall be equal to the width of six (on each side of aisle) spaces plus 1.0 m, unless provision is made for cars to turn around at the end and drive out forwards.
8. Parking angles less than 60 degrees are discouraged.
9. Where there is parallel parking on one side, and angle parking on the other side, the aisle width will be as specified in Table 2.X for the angle parking, plus an additional 0.5m.
10. Circulation areas and ramps will be designed in accordance with the 99th percentile car.