

ref: Thornton/30271

19 March 2025

Hutt City Council  
Private Bag 31912  
Lower Hutt

Via Proposed District Plan submissions

Dear Hutt City Council

## **SUBMISSION TO PROPOSED HUTT CITY DISTRICT PLAN**

This is a submission on behalf of our client D.M.A.C Homes Limited trading as Friday Homes generally in support of the Proposed Lower Hutt District Plan 2025 (PDP).

In particular they support the proposed zoning of land at 30 Pencarrow Crescent, Wainuiomata from Hill Residential to Medium Density Residential as:

- The site is not identified as being at significant risk to natural hazards;
- The rezoning will aid Hutt City Council (HCC) towards meeting their growth targets of 2,631 dwellings by 2051<sup>1</sup>;
- The rezoning merely extends that zoning of the adjacent land, which is within the Medium Density Residential Zone, and result in a character consistent with that zoning;
- The site is easily serviced, and available for residential development, as evidenced by the resource consent lodged over the site (ref: RM240220);
- The site does not exhibit characteristics that would warrant any other zoning, as it is largely vacant, in an urban context, without any steep topography, vegetation or exhibiting any significant natural or landscape amenity values.

It remains our view that the site is a good candidate for residential intensification, as outlined in the resource consent mentioned above, and therefore we support the HCC's proposed rezoning to Medium Density Residential.

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<sup>1</sup> [Wairarapa-Wellington Horowhenua Region - Housing and Business Development Capability Assessment - August 2023 - Chapter 3 - Hutt City Council](#)

However, they oppose the Highly Productive Land (HPL) mapping within the PDP, including over land at 1044 Coast Road, Wainuiomata Coast as:

- The current Government has given a very strong indication of their intent to re-define what is HPL, including the exclusion of Land Use Capability (LUC) 3 from the definition as outlined in the National Party's Going for Housing Growth policy<sup>2</sup>.
- A review of the Manaaki Whenua Landcare Research mapping of LUC<sup>3</sup>, shows that only LUC 3 land is located within HCC's area. LUC 1 and 2 land are not present within HCC's boundaries.
- Notwithstanding, to our knowledge, there is no commercial horticultural or viticultural activities occurring within the boundaries of HCC. The only commercial growing that does occur within HCC is forestry, which does not require good agricultural soils for growth and is restricted to the slopes.
- Further, with the exception of the area from the South Coast, north to the existing urban boundary of Wainuiomata along Coast Road (which includes this site), all other pockets of land proposed to be mapped as highly productive is in our opinion, highly fragmented and no-cohesive, which in our view would clarify as areas exempt from the HPL under clause 3.4(5)(d) of the National Policy Statement for Highly Productive Land (NPS-HPL).
- Under clause 3.5(3) and 4.1(2) of the NPS-HPL, there is no obligation for HCC to map HPL in advance of mapping by Greater Wellington Regional Council (GWRC) in the relevant regional policy statement.
- Therefore, it seems premature to map land as HPL in the PDP as it appears likely that LUC 3 will be removed from the NPS-HPL definition of HPL, and LUC 1-2 are not present in the HCC boundaries.
- Relief is therefore sought to remove all highly productive mapping from the PDP, until it is required to be mapped under clause 3.5(3) and 4.1(2) of the NPS-HPL.
- It is noted that until such time, for the purposes of resource consenting, land identified as LUC 3 and within the General Rural or Rural Productive zones will remain effectively considered Highly Productive Land under clause 3.5(7) of the NPS-HPL.
- It is also noted in the event that LUC 3 is not removed from the definition of HPL, HCC can simply adopt the GWRC mapping in the regional policy statement and amend the District Plan accordingly under section 55(2) of the Resource Management Act 1991 (RMA) as directed by clause 3.5(4) of the NPS-HPL and avoid the schedule 1 process.

<sup>2</sup> National Party, Going for Housing Growth  
[https://assets.national.org.nz/Plan\\_Going\\_for\\_housing\\_Growth.pdf](https://assets.national.org.nz/Plan_Going_for_housing_Growth.pdf)

<sup>3</sup> [https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri\\_luc\\_main](https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri_luc_main)

**Summary**

- Support rezoning of 30 Pencarrow Crescent, Wainuiomata to Medium Density Residential Zone.
- Oppose the inclusion of highly productive land mapping in advance of mapping by GWRC in the regional policy statement.

My email address for service is [Elliott.Thornton@cuttriss.co.nz](mailto:Elliott.Thornton@cuttriss.co.nz).

The specific relief sought is listed in Attachment 1. The submitter is not a trade competitor. The submitter may wish to be heard in relation to this submission to assist the Hearing Panel.

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

Yours faithfully



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#	Chapter / Sub-part	Specific provision – matter	Position	Reason for Submission	Decisions requested / relief sought
1	Medium Density Residential Zone over 30 Pencarrow Crescent, Wainuiomata	Zone	Support	<p>The retention and expansion of Medium Density Residential Zone would:</p> <ul style="list-style-type: none"> <li>- Is surrounding by land already zoned Medium Density Residential;</li> <li>- Is able to support additional housing;</li> <li>- Is not subject to significant natural hazards;</li> <li>- Will aid in meeting the Hutt City Council's projected housing demand over the next 30 years.</li> </ul>	Rezoned as Medium Density Residential Zone
2	Highly Productive Land mapping  General Rural Zone Chapter  Subdivision Chapter	Highly productive land overlay	Oppose	<ul style="list-style-type: none"> <li>- The NPS-HPL is likely to be amended to exclude LUC 3 from the definition of HPL.</li> <li>- There are no known commercial horticultural or viticultural activities within HCC at present.</li> <li>- There is no requirement to introduce HPL mapping in advance of mapping by</li> </ul>	<p>Remove highly productive land mapping overlay.</p> <p>Remove references to Highly Productive Land Overlay in the preamble to GRUZ.</p> <p>Remove GRUZ-HPLO-O1.</p> <p>Remove GRUZ-HPLO-P1 and P2.</p> <p>Remove GRUZ-HPLO-R1 and R2.</p> <p>Remove SUB-P11 Item 2.</p> <p>Remove SUB-P23.</p>

				GWRC in the regional policy statement.	Remove SUB-R22.
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