

# Submission PDP/472

AGAINST PROPOSED CHANGE TO MEDIUM DENSITY FOR RAKEIORA GROVE



# Who we represent

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Rebecca Leask, Ben Young	38 Rakeiora Grove
Mette Mikkelsen, Ben Steele	36 Rakeiora Grove
Dianne Keeman, Mark Keeman	31 Rakeiora Grove
Debbie Tse	29 Rakeiora Grove
Mike Stewart, Kylie Barton	25 Rakeiora Grove
Sally Gale, Nick Gale	24 Rakeiora Grove
Bob Williams	22 Rakeiora Grove
Anne Crivello and Dean	18 Rakeiora Grove
Denise Mendez-Kerr	2 Rakeiora Grove

Note that the submission referenced a previous submission for District Plan Change PC56 (DCP56/160) against changes to the zoning of Rakeiora Grove from Hill Residential, which was supported by an additional 20 property-owners for similar reasons to this submission.

# Personal statement – Rebecca Leask

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I am one of the owners of the heritage-listed property *Taumata*, at 38 Rakeiora Grove, Korokoro. I have chosen to represent the Rakeiora Grove community in this submission because of a real sense of responsibility as a kaitiaki of *Taumata*, its heritage and its surrounds.

I acknowledge that housing intensification is a reality and required to meet future growth of the Hutt Valley and urban growth in general. However, areas should only be zoned for that development if it is realistic.

For *Taumata* and several of its surrounding properties, I don't believe that to be case due to steep gradient, high levels of vegetation cover and the challenges of providing sufficient infrastructure – all of which are justification for a change to Large Lot Residential Zone (as per the LLRZ-01 statement of purpose).

I would like to assure this important piece of the heritage of Te Awa Kairangi for the future.



# Our Submission

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Rakeiora Grove is currently zoned as Hill Residential. The District Plan Review proposes to change this zoning to Medium Density Residential.

This zoning change represents a wholesale planning change in an area that we believe has **marginal viability to deliver the intended housing benefits** while opening the door for significant negative impacts to the environment, local residents, Korokoro residents and the residents of Petone in general.

We submit that the application of Medium Density Zoning to the area bounding Rakeiora Grove and London Road **creates an unreasonable expectation about what could be viable for development.**

- Large cost to develop with significant impacts and minimal benefits
- Consenting complexity for residents and council - misleading zoning for developers
- Significant risk of costs to ratepayers – service maintenance and land maintenance
- Inconsistent with neighbouring zoning and elsewhere

We note that the panel recommendation in response to the District Plan Review PC56/160 submission was to retain a Hill Residential Zoning for Rakeiora Grove/London Road:

In para 3.8.17 of the final report of the Independent Hearing Panel, it was noted that the area **would not contribute meaningfully to housing capacity and noted the steepness of the land.**

# Our Submission

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The area will not fulfil the purpose of Medium Residential Zone MRZ-01:

*The Medium Density Residential Zone contributes to a well-functioning urban environment through the provision of predominately residential activities and housing in locations **that are appropriate for medium density development.***

Parts of Rakeiora Grove are more closely aligned with the purpose of Large Lot Residential Zone LLRZ-01:

*The Large Lot Residential Zone contributes to a well-functioning urban environment through managing development in residential areas with constraints that mean they are less suited to the level of density and development found in other residential areas, **particularly relatively steep slopes, high levels of vegetation cover, constraints in infrastructure, and lower levels of access to commercial services and community facilities.***

The attributes of the Rakeiora Grove properties in our submission more closely align with the LLRZ purpose and with the other properties in Korokoro that have been zoned LLRZ.

## Medium density development is not appropriate due to:

- Significant natural hazard risk
  - Regular landslides + earthquake risk
  - Highest wind zone in New Zealand
- Need to protect the environment
  - Protect natural features and landscapes
  - Protect indigenous habitat and species
  - Significant Natural Resource 27
- Historic Heritage
  - The Taumata Homestead at #38
  - Area is significant to Māori

# The Area

- Steep terrain
- Unstable land
- Extreme wind
- Limited access
- Includes SNR 27
- Includes heritage-listed homestead *Taumata*



With specific consideration of:

- Properties with SNR27 overlay (#22, 24, 38, 36 Rakeiora Grove)
- The heritage-listed property at #38 Rakeiora Grove and surrounding properties (determined based on expert input if required) that may impact the historical significance of that property
- Relevant properties in the area bounding Rakeiora Grove and London Road due to topography, risk to the environment, lack of infrastructure and access, and loss of amenity (properties at 38, 36, 31, 29, 25, 24, 22 and others)

# Observation on equivalency

It is important to highlight inconsistencies that could result from the blanket application of MRZ/LLRZ to grouped areas within Korokoro.

Specifically, all properties to the west/south-west of Korokoro are proposed as LLRZ in the PDP.

The properties we have specifically called out in our submission would be equivalent to these, in terms of:

- Steepness of gradient – at least as steep, and likely steeper than many of the properties in the southwest e.g. Te Ahi Parera PI, Korokoro Rd near the school, with regular slips observed
- High levels of vegetation cover, including SNR27
- Constraints in infrastructure, particularly water drains with persistent leaks, and access constraints for properties in the cul-de-sac
- All of which are justifications for LLRZ under LLRZ-01.

In terms of the other criteria identified in para 493 of the *Summary of Report Findings*, it is important to note the current ODP Hill Residential Zone alongside the findings of the final report for District Plan Review PC56/160 that the area **“would not contribute meaningfully to housing capacity and noted the steepness of the land”**.

We are interested in how all the properties to the west/south-west of Korokoro satisfy the criteria of para 493 in comparison.



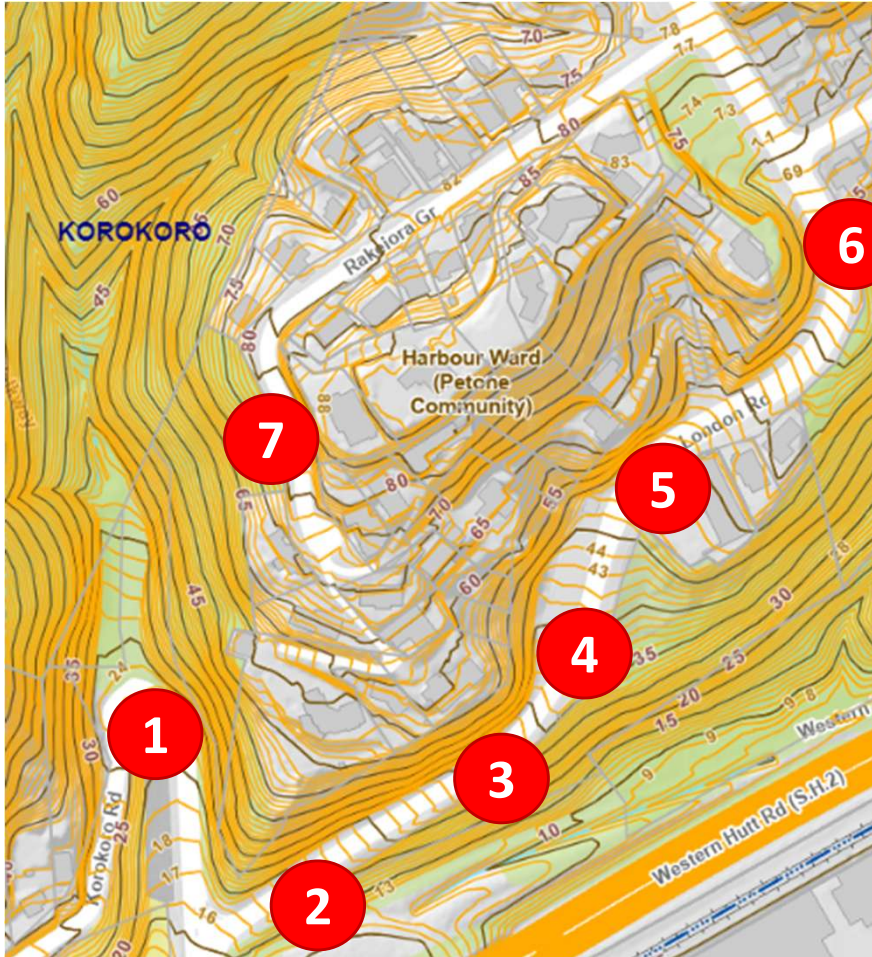
- Large Lot Residential Zone
- Medium Density Residential Zone
- Natural Open Space Zone

# Significant Natural Hazard Risk

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# Must manage Landslide Risk

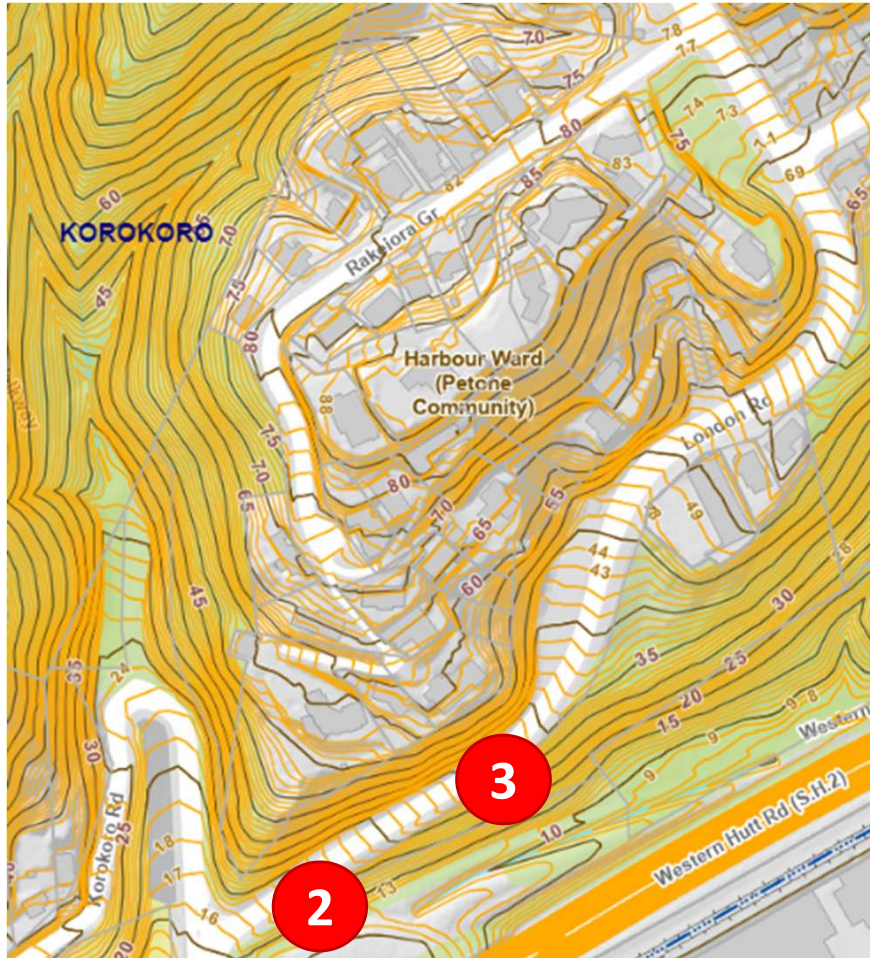


Significant risk to all properties bounding London Road

- Very steep hillside **45 to 90 degree slopes**
- Land slippage a constant problem
- Council crews constantly cleaning up
- Upzoning is not managing the risk
- Upzoning ignores the topology
- Upzoning ignores climate change
- Development will cost ratepayers

Seven significant slips in winter of 2022, repeating through 2023-2026 rain events particularly along the bank between (2) and (3). Photos on next page from June 2026.

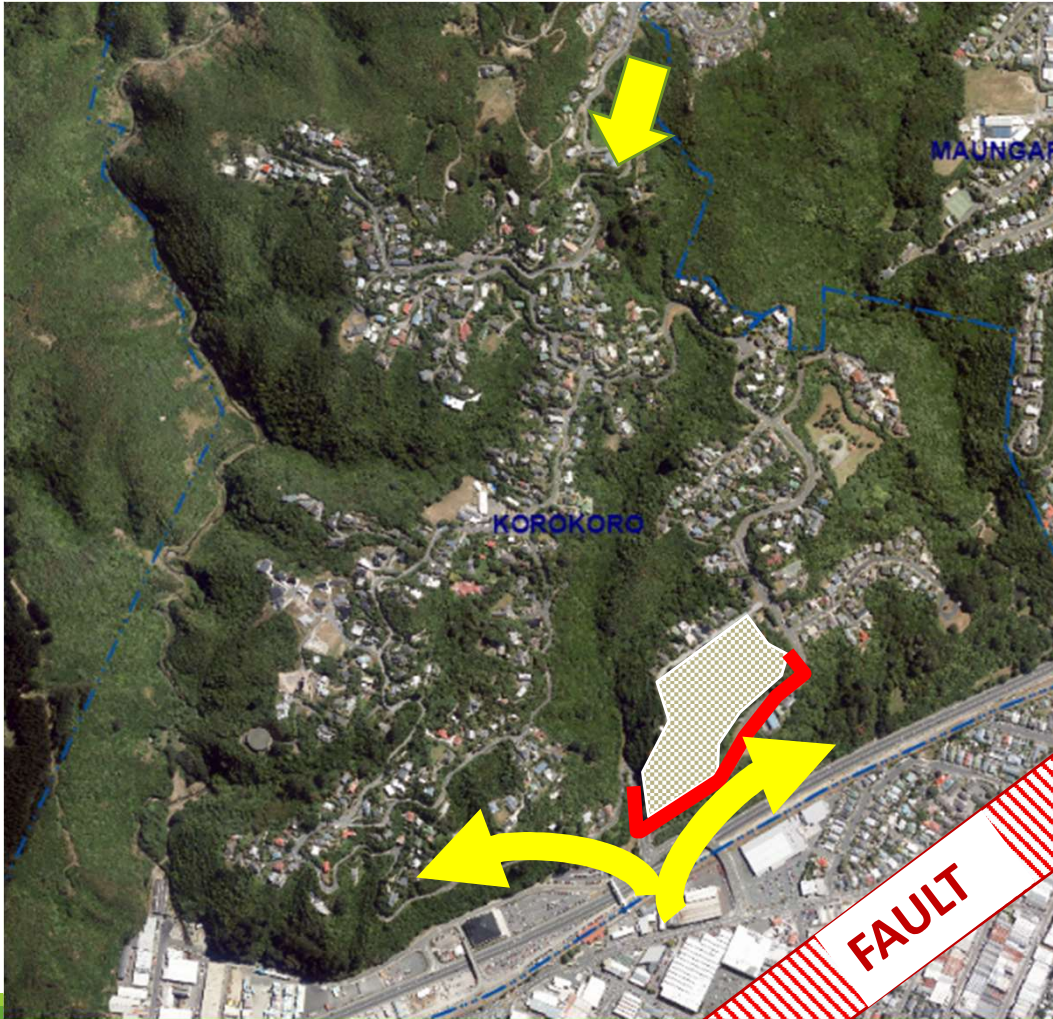
# Must manage Landslide Risk – evidence of recent slips



Repeated slips on this bank alongside London Road.  
Photos from rain event last month, June 2026.



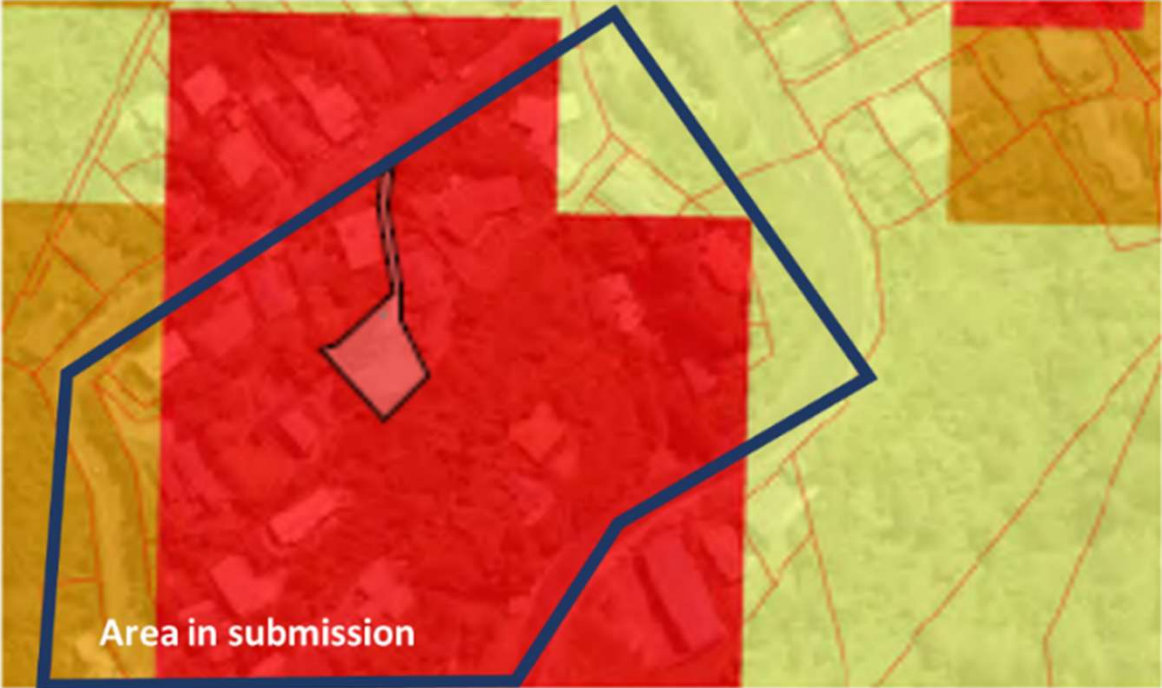
# Manage Earthquake Risk



- Wellington Fault only **320m** away
- London Road important access for the suburb
- Only three ways into Korokoro – all prone to slippage
- Road blockages are common just from rain events

Development threatens emergency access for over 500 dwellings

# Manage Extreme Wind Risk



### Wind Zone Legend

- Low 
- Medium 
- High 
- Very High 
- Extreme High 
- SED 

SED > 60m/s  
Highest wind zoning in New Zealand

Analysis from ~2022 dwelling building consent. SED under NZS3604.

**SED = "Special Engineering Design"**

Substantial engineering costs for just a single storey dwelling

Development threatens residents. Medium Density misleads developers.

# Mitigation

Neighbourhood	Hazard	Mitigation Options				
		Engineering	Building	Planning	Emergency Management	Infrastructure
Wainuiomata	Landslide	Slope reinforcement Drainage Rock-bolting Shot-crete Revegetation	Foundation design Storm-water design	Plan to avoid development in landslide prone areas Measuring and monitoring	Recovery plans Road closures Evacuation plans	Storm-water design Location of utilities
	Subsidence	Remedy land		Limit development Managed retreat	Response plans	
Waterloo	Ground Shaking	Foundation requirements Compliance with building standards	Foundation requirements Compliance with building standards		Response and Recovery plans	Design of utilities
Western Hills	Fault		Foundation requirements Compliance with building standards	Fault hazard avoidance zone	Response and Recovery plans	Design of utilities
	Landslide	Slope reinforcement Drainage Rock-bolting Shot-crete	Foundation design Storm-water design	Plan to avoid development in landslide prone areas Measuring and monitoring	Recovery plans Road closures Evacuation plans	Storm-water design Location of utilities

Mitigation options proposed in the GNS Science Consultancy Report 2016/74 (May 2016), Review of Hazard Information for Hutt City –

a clear mitigation action in that report is to **avoid development in landslide prone areas** on the Western Hills.

# Mitigation



The Slope Assessment Overlay could provide some mitigation for several properties due to the need for specific resource consent, however does not apply fully to #21, 24, 29, 32 – this could still create an impact for surrounding properties on top of the steep banks and ridgeline.

Development threatens residents.  
Medium Density misleads developers.

# Need to Protect the Environment

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# Need to Protect Galbraiths Gully - SNR 27



*“Regionally representative as **one of the few examples of coastal Kohekohe-Karaka forest**. Rich bird, fish and invertebrate diversity.”*

Significant Natural Resource Area 27 - Lower Hutt City Council

## Galbraiths Gully and Tuara-whatī-o-te Mana stream

Impacts #22 #24 #36 #38  
Rakeiora Grove

Currently “healthy”:  
freshwater scientist  
Amanda Valois

Native fish, eels and  
freshwater crayfish

Threats of development

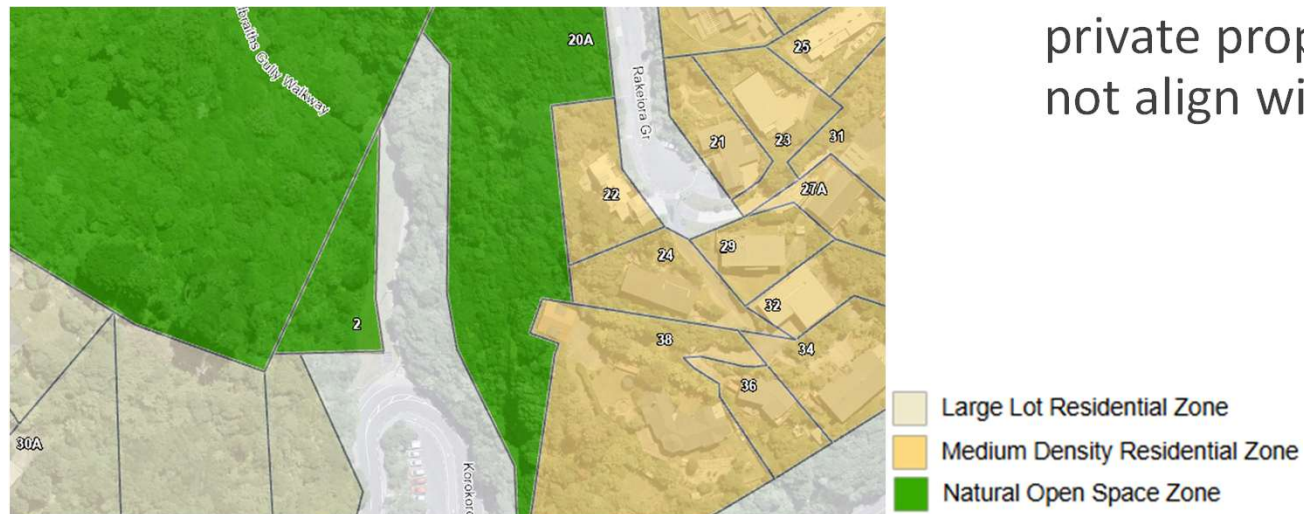
- habitat loss
- natural water run off
- pollution

# Need to Protect Galbraiths Gully - SNR 27



It is unclear how the SNR27 overlay is sustained in the PDP.

The map shows a Natural Open Space Zone, but that does not include any private property and does not align with SNR27.



# Historic Heritage

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# Need to Protect Heritage

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“a High level of significance in relation to: people (association with Ripeka Love); architectural style including a marae incorporated into the house; **surroundings of the building are important to understanding the significance of the place**; integrity and authenticity; and being a good representative of its type.”

(November 2021) Heritage Inventory Assessment



- #38 Taumata heritage listed dwelling
- Circa 1910 by Rīpeka Wharawhara Love and Wī Hapi Pakau Love, descendants of two prominent Te Ati Awa families
- Love whānau remain in the area and are active in the community
- Neighbouring properties all above on steep slope
- Situation is visible from Petone

Development would significantly impact heritage value.  
Risk of impact from intense development of properties behind and adjacent to this building due to overshadowing and impact of earthworks.  
Negatively impact view from Petone.