SUBMISSION HUTT CITY COUNCIL DISTRICT PLAN
Wainuiomata Rural Community Association Incorporated

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Wainuiomata Rural Community Association Incorporated [hereafter WRCAI] welcomes this chance to submit on the Proposed District Plan for the Hutt City.

Summary of Oral Submission

1. WRCAI strongly objects to the failure of Hutt City Council to provide information relevant to the District Plan hearings. The following request was made to HCC on 10 August 2026: All resource consent related documents and communications for the following Wainuioimata parcels, dating from 1 January 2020: Lot 5 DP 583117, Lot 4 DP 583117, Lot 3 DP 583117, Lot 4 DP 80089, Lot 101 DP 502368 and Lot 20 DP 302320. on 7 September 2026, HCC refused to supply the requested information. WRCAI believes that the information requested is relevant to the issue of subdivision and objects to the necessity of submitting at this hearing without access to this information. This is information which WRCAI may reasonably request under discovery when the matter of the District Plan is brought to the Environment Court. The failure to provide this information is an abuse of process.

2. WRCAI strongly objects to the fact that basic information relating to the Proposed District Plan and the Proposed District Plan Maps have been intermittently unavailable during the hearing process. WRCAI has received complaints from members who have found that relevant information has been either unavailable or extremelly difficult to locate. WRCAI notes with concern that the relevant Section 42A reports for this hearing appear to be not discoverable with an internet search at the time of writing (13 October 2026 3 pm).

3. WRCAI relies in part on its submissions presented in Hearing 3, where these are relevant to this hearing [Document 1].

4. WRCAI objects to allowing a 1 hectare minimum subdivision for the large parcels at the end of Moores Valley [Hearing #3, S42A 4.2.9 p.33] and notes a relevance to the objections of residents to the subdivision rules for Crowther Road [See Maps 1-5]. Since,Hearing 3, an information request has revealed a pre-appllication request for a 55-lot subdivision at the end of Moores Valley [See Map 7]. WRCAI notes with concern the possibility that not all information relevant to the information request have been supplied. In particular, the map supplied shows a 55-lot subdivision, but the correspondence supplied refers to a 100-lot subdivision. Presumably, the 100-lot subdivision proposal is based upon the proposed subdivsion limit for Rural Residential Zone in the Proposed District Plan.

5. WRCAI continues to object to the Highly Productive Land overlay being applied to rural properties. This objection extends to the use of the overlay to determine elements of the proposed District Plan such the effects for subdivision. WRCAI strongly objects to the consideration being given to the Highly Productive Land overlay in relation to rural land given that the Highly Productive Land GIS layer has been removed from the HCC GIS server prior to these hearings. Landowners cannot access the layer and cannot effectively engage with this

process as a result. WRCAI notes with concern multiple references to the issue of Highly Productive Land within the Section 32 Report relating to subdivision.

6. Paragraph 8 Section 32 Report Subdivision:
Where subdivision precedes land use, the creation of new undeveloped sites needs to ensure that newly created allotments and units are of a size, shape and orientation that are fit-for-purpose and that existing and future activities can be accessed and adequately serviced, either by reticulated services or on-site services including water supply, wastewater disposal, stormwater management, telecommunications and power supply. [Section 32 Subdivsion Paragraph 8 p. 4.]

6.a) WRCAI submits that the proposed minimum one hectare limit for Rural Residential Zone is at odds with the points listed in paragraph 8.

6.a.a) WRCAI notes that the issue of wastewater disposal is highly relevant to the issue of subdivision size. Greater Wellington Regional Council requirements for wastewater include certain set requirements such as offsets from boundaries. However, the critical issue of the size of seepage fields requires a consideration of soil types and drainage. WRCAI believes that it is unlikely that all water disposal can be contained within a one hectare parcel. The complete lack of discussion of the issues of how the reduction of the minimum subdivision size affects wastewater disposal within the Proposed District Plan and officers' reports is concerning.

6.a.b) There is a reference to treatment for storm-water with the possible development of the end of Moores Valley. The Scouts Association are within the association's mailing list and have communicated with the association on the issue of water requirements. If a development is undertaken in the nearby area proposed for development and this leads to a requirement for connection to any form of treatment scheme, whether or not this ultimately connects to the district system, this is likely to undermine the nationally important Scouts facility.

6.a.c) Storm water services are highly constrained for Coast Road, Moores Valley and Wainuiomata North. A major reduction of the minimum subdivision size will put further strain on these services.

6.a.d) WRCAI has been in communication with Wellington Electricity. They have expressed a concern with the electrical supply for Moores Valley. Even without a major subdivision on Moores Valley there is a concern about any major uptake in electric vehicles in Moores Valley. The Moores Valley area is already at its limit for the existing electricity infrastructure. Even if the lot sizes are not reduced, there is an urgent need for HCC to directly communicate with rural property owners in Moores Valley on the issue of electricity constraint.

7. The National Planning Standards state that Rural Lifestyle Zones are to enable production:

Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.
[Ministry for the Environment. November 2019. National Planning Standards. Table 13 p.37.]

7.a) Moores Valley includes General Rural and Rural Residential zones. Halving the minimum subdivision size within the Rural Residential Zone has the potential to interfere with the production on the General Rural Properties. This would include the increased strain on the road and electricity infrastructure.

7.a.a) There is no discussion of the production activities that are being undertaken on the General Rural Zone in Moores Valley in the officers' reports.

7.a.b) A simple statement within the Section 42A report claims that the issue of allowing for production activities had been considered (Section 42A Subdivision paragraph 376). However, there is no detailed or specific explanation how consideration was given to the issue of how a halving of the minimum subdivision size might affect the production activities on General Rural properties where this occurs, namely within Moores Valley.

8. The Section 32 Report for Subdivision mentions the HCC Urban Growth Strategy 2014 [Paragraph 55 pp. 25-26]. A critical element of that document has not been repeated in the Section 32 Report for Subdivision. The original document indicated that a reduction of minimum lot size would be preceded by an investigation into the issues of septic tanks (and water quality) and air quality [Urban Growth Strategy 2014 p. 9]. The promise to investigate the issues of water and air quality was a result of push-back from the rural community during the period when the Wainuiomata North Framework was being developed.

8.a) WRCAI understands that the reference to an investigation into air quallity in the Urban Growth Strategy related to the issue of fireplaces. There is no reference to the National Environmental Standards for Air Quality in the officers' reports. Under those standards, section areas of less than 2 hectares are subject to emissions standards that do not generally apply in rural areas. WRCAI believes that the failure to investigate the issue of air quality as promised indicates a failure to properly inform itself prior to proposing a reduction of the minimum lot size for Rural Residential Zone.

8.a.a) WRCAI believes that the proposal of 1 hectare minimum crosses a fundamental threshold in relation to air quality and that the failure to mention this in the officers' reports is a serious omission.

8.a.b) WRCAI understands that the National Environment Standards for Air Quality will prevent the adoption of wetback fires for properties less than 2 hectares. This will put more strain on the electricity infrastructure and adds to the concerns expressed at 6.a.d.

8.a.c) WRCAI understands that the National Environment Standards for Air Quality will limit the adoption of fires for heating for properties less than 2 hectares. This will put more strain on the electricity infrastructure and adds to the concerns expressed at 6.a.d.

8.b) WRCAI understands that the reference to an investigation into water quality was promised during the period when HCC was investigating a reduction in lot size from 2 hectares to 1 hectare in the Rural Residential areas. WRCAI believes that the failure to investigate the issue of water quality as promised indicates a failure to properly inform itself prior to proposing a reduction of the minimum lot size for Rural Residential Zone.

9. With regards to the submissions of the residents of Crowther Road, WRCAI notes that the Hearing #3 S.42A report ignores the situalion for the proporties on the north-eastern part of Wainuiomata North [Zoning S.42A 4.5.2 pp.88-89] . That is to say that the properties on the north-eastern side of Wainuiomata were changed from General Rural in the operative plan to Rural Residential in the proposed plan despite being more constrained than the properties in Crowther Road (compare Maps 1 and 3).

9.a) Properties this area are General Rural in the operative District Plan but are proposed Rural Lifestyle in the proposed District Plan:

Lot 5 DP 583117
Lot 4 DP 583117
Lot 3 DP 583117
Lot 4 DP 80089
Lot 101 DP 502368
Lot 20 DP 302320

9.b) Most of these properties are in the same situation as the Crowther Road properties in that they are within the Highly Productive Land overlay area.

9.c) The parcels in Wainuiomata North are relatively more constrained than the Crowther Road properties in terms of slope.

9.d) The parcels in Wainuiomata North are relatively more constrained than the Crowther Road properties in terms of road access.

9.e) The parcels in Wainuiomata North are now within an area likely to be a kiwi habitat (https://www.rnz.co.nz/news/environment/522282/watch-kiwi-spreading-from-remutaka-ranges-to-upper-hutt).

9.f) The proposed reduction of minimum lot size from 2 hectares to 1 hectare is actually a reduction from 15 hectares to 1 hectare in some of these specific parts of the rural area. There is no direct acknowledgment of this in any of the officers' reports for this hearing. There is as a result, a very significant change for one localised part of the district that cannot be readily explained in the Proposed District Plan or in the officers' reports. WRCAI believes that a significant change such as this warrants a direct and clear discussion.

10. With regards to the two large parcels on the north-western side of Moores Valley (Lot 55 DP 89549 and Lot 60 DP 354855 Zoning S.42A 4.5.3), WRCAI argues that the application of the Rural Lifestyle zone in the operative District Plan is an artefact of the historical circumstances. A one hectare subdivision minimum for this area is absolutely not appropriate. These parcels are effectively the balance parcels of a previous subdivision. Part of the planned subdivision occurred and part did not. The land was sold after the current parcels along Brookfield Lane were sold. The key points are as follows:

10.a) The most easily developed sections of the initially planned subdivision were subdivided and sold. The remaining area is much less favourable to development. A reconsideration as to the minimum lot size in the operative plan and the proposed plan must be considered in the light of this fact.

10.b) The original subdivision proposal proposed and defined multiple areas of reserve for vesting on deposit and areas for private covenant. These areas are clearly identified within the Council record but have nevertheless been proposed for Rural Residential zone [See Map 6].

10.c) Greater Wellington Regional Council issued four abatement notices for illegal works, stream restoration and wetland restoration within the Brookfield area owned by Goh Realy [GWRC 2008_15_1_Report]. There is no reference to this in the documents for the proposed developments for the same area provided by HCC.

10.d) The consulting company Wildlands produced a report on a wetland within the parcel Lot 60 354855. Since the subdivision of the initial sections the Greater Wellington Regional Council has adopted definitions of Wetlands that would now would include a large proportion of the flat area of Lot 60 354855.

10.e) Kiwi calls have been heard within the area being propsed for Rural Residential zone and associated 1 hectare development (https://www.rnz.co.nz/news/environment/522282/watch-kiwi-spreading-from-remutaka-ranges-to-upper-hutt). An officially published map derived from the Kiwi restoration project of the Remutaka Conservation Trust shows kiwi calls recorded just to the east of the proposed development in Moores Valley in 2021 [Acoustic Survey of North Island Brown Kiwi Population in the Remutaka Forest Park from 2011-2021. Remutaka Conservation Trust 2023]. However, since that time, residents have heard kiwi calls well to the south and west of this locations.

10.f) The hill parts of Lot 55 DP 89549 and Lot 60 DP 354855 are covered in mature and regenerating indigenous forest [See Maps 4-5].

10.g) WRCAI supports the submission of the Scouts Association with regards to the end of Moores Valley. WRCAI notes with concern that the S.42A report evidently disputes that the Scout Camp is a regionally significant recreational area [S.42A . 4.5.3 Para 422 p 91]. WRCAI believes that the scout camp is absolutely an area of regional and national importance and this is clearly supported by the long history of nationally significant events that have occured at this location.

11. WRCAI supports the easing of earthworks restrictions and urge some further lifting of some restrictions in some instances. WRCAI found that the text of the Proposed District Plan was unavailable at the time of writing (14 October 2026 8:35 am). WRCAI wishes to make it clear that it could not engage fully with this issue prior to Hearing #7.

11.a) WRCAI understands that the Operative District Plan is unusual in its failure to permit earthworks associated with fences and farm tracks. WRCAI understands that this particular issue was a significant issue for the construction of an ungulate-proof fence for a 38 hectare QEII covenant. The QEII representative and the Wairarapa-based fencer were surprised by the Hutt City Council District Plan rules relating to earthworks.

11.b) WRCAI supports the apparent easing of restrictions for farm tracks in the Proposed District Plan.

11.c) WRCAI believes that the issue of earthworks for fences needs to be considered alongside the issue of fence servicing tracks. In many areas, there is a need to cut two lines, one for the fence and another for a service track.

Relief Sought

A) **Minimum subdivision area for Rural Residential Zone increased to 2 hectares.**

B) **Minimum lot area for General Rural Zone reduced to 7 hectares.**

C) **Investigations into water quality flagged in 2014 be undertaken prior to any reduction in the proposed lot size for Rural Residential Zone.**

D) **Investigations into air quality flagged in 2014 be undertaken prior to any reduction in the proposed lot size for Rural Residential Zone.**

E) **All earthworks associated with fences, tracks and specifically tracks associated with fences be permitted activities.**

F) **All earthworks restrictions removed within Queen Elizabeth II National Trust covenants where earthworks align with the stated purpose and plan for those covenants. QEII and landowners to inform HCC of intended works prior to commencement.**

Craig Innes,

Chairman

Wainuiomata Rural Community Association Inc.