

17 June 2026

By Email: Saritha.Shetty@huttcity.govt.nz

Attention: Saritha Shetty

C/O: Lindsay Daysh and the Independent Hearing Panel appointed for the Proposed Lower Hutt District Plan

Hutt City Council
30 Laings Road
Lower Hutt 5010

Hearing 3 Residential and Rural - Proposed Lower Hutt District Plan

1. Introduction

- 1.1 We act for Argosy Property No. 1 Limited (**Argosy**).
- 1.2 Hutt City Council (**Council**) notified the Proposed Lower Hutt District Plan (**PDP**) on 6 February 2025. Argosy made a submission on the PDP (Submitter 237) on 4 April 2025.
- 1.3 Argosy's submission relates to three properties it owns in Lower Hutt, including its property at 39 Randwick Road, Moera (**Randwick Road Property**). Argosy sought, among other things, that the area adjoining the southern boundary of the Randwick Road Property and on the western side of Randwick Road, be rezoned from Medium Density Residential Zone (**MDRZ**) to High Density Residential Zone (**HDRZ**).
- 1.4 This area comprises the MDRZ land bounded by Randwick Road, Waione Street, and includes properties on Tirangi Road, Pitt Street, Pirie Crescent, Croft Grove, and Okoutu Lane (the **Area**), as identified in Appendix A to this letter.
- 1.5 The Council's reporting officer's section 42A report for Hearing 3 (Residential and Rural) (**Section 42A Report**) was released on 21 May 2026. The Section 42A Report does not support the relief sought by Argosy on the basis that the Area falls outside the identified walkable catchments for the HDRZ and serves as a transitional area between more intensive zoning to the north and south of the Area.
- 1.6 In response to the Section 42A Report, Argosy considers that:
 - (a) applying the HDRZ to the Area would give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**), given the area's high level of connectivity to commercial activity within nearby suburban centres and community facilities; and
 - (b) would achieve a more compatible built form outcome with the surrounding zones, such that retaining the MDRZ as a transitional buffer is unnecessary.
- 1.7 These matters are expanded on below.
- 1.8 Argosy has elected not to appear at Hearing 3 but respectfully requests that this letter be provided to the Independent Hearing Panel (**IHP**) for its consideration.

2. Background to Argosy and its submission

- 2.1 As set out at paragraphs 4–6 of Argosy’s submission, Argosy is a commercial property ownership company with a portfolio of high-quality industrial, office, and retail properties across the Auckland and Wellington regions.
- 2.2 Argosy’s investment strategy focuses on maintaining a balanced mix of core and value-add properties while targeting assets that support strong long-term demand. As Argosy continues to reinvest in and refine its portfolio, it seeks to ensure that the PDP provides appropriate planning controls and enables suitable future development, including in respect of the Area adjoining the Randwick Road Property.
- 2.3 In its submission, Argosy sought that the Area be rezoned from MDRZ to HDRZ on the basis that this would be consistent with the extent of HDRZ zoning to the north of the Randwick Road Property.

3. Section 42A Report – Hearing 3 Residential and Rural

- 3.1 The Section 42A Report does not support the relief sought by Argosy to upzone the Area for the following reasons:
- (a) the Area falls outside the walkable catchments identified for the HDRZ under Plan Change 56: Enabling Intensification in Residential and Commercial Areas (**PC56**);¹
 - (b) there is less intensive commercial activity surrounding the Area compared to areas further north zoned HDRZ;² and
 - (c) the Area serves as a transitional area, from the more intensive commercial, light industrial, and high-density residential uses to the north, and the more intensive industrial uses to the south.³
- 3.2 Based on the above, the Section 42A Report concludes that it is more appropriate for the Area to remain MDRZ.⁴

4. Applying the HDRZ to the Area is appropriate and consistent with the NPS-UD

- 4.1 The Section 42A Report relies on the walkable catchments applied through PC56 to justify retaining the current extent of HDRZ in the PDP. The Section 42A Report considers this approach appropriate and consistent with that taken by other councils.⁵
- 4.2 It is further explained in the Section 42A Report, that PC56 amended the Operative City of Lower Hutt District Plan to give effect to the Medium Density Residential Standards and the NPS-UD, in particular Policies 3 and 4. However, the Section 42A Report also acknowledges that, due to the limited time between PC56 and the PDP, there has been limited opportunity to test the appropriateness of those walkable catchments.⁶
- 4.3 The NPS-UD does not constrain the Council’s ability to zone areas HDRZ based on the application of walkable catchments, and instead provides only a minimum standard. Argosy notes that whilst there is no definition of “walkable catchment” in the NPS-UD or the PDP, the relevant zone descriptions in the PDP provide guidance in determining the application of the HDRZ and MDRZ.

¹ Section 42A Report – Residential Zones, 21 May 2026 at [556].

² Section 42A Report – Residential Zones, 21 May 2026 at [557].

³ Section 42A Report – Residential Zones, 21 May 2026 at [557].

⁴ Section 42A Report – Residential Zones, 21 May 2026 at [558].

⁵ Section 42A Report – Residential Zones, 21 May 2026, at [601] – [603].

⁶ Section 42A Report – Residential Zones, 21 May 2026, at [602].

- 4.4 The zone statement describes the HDRZ as applying to residential areas with a higher level of access to commercial activities and community facilities, including areas surrounding train stations, the Lower Hutt city centre, the Petone metropolitan centre, and some suburban centres.⁷ In comparison, the zone statement for the MDRZ applies to areas that have a lower level of access to commercial centres, community facilities and rapid transit services than the HDRZ.⁸
- 4.5 Argosy considers that it is appropriate to rezone the Area to HDRZ, for the following reasons:
- (a) the Area has a high level of connectivity to commercial activity within nearby suburban centres. The HDRZ is intended to apply to areas surrounding suburban centres, including Local Centre Zones and Neighbourhood Centre Zones.⁹ The Moera Local Centre Zone is located approximately 400 metres from the Area, and the Area is directly fronted by a Neighbourhood Centre Zone. Residential development surrounding these areas is expected to be in the form of apartments above ground level, which supports the application of the HDRZ; and
 - (b) there is a Natural Open Space Zone directly adjacent to the Area and an Open Space Zone land located to the south-east. These open space and recreational amenities enhance the liveability and attractiveness of the area for higher-density residential development. This is consistent with the types of community facilities anticipated to support HDRZ zoning. In addition, the Randwick School and Community Emergency Hub is located approximately 150m from the Area.
- 4.6 Taken together, the Area is supported by commercial activity and community facilities, and has the level of connectivity anticipated for areas to be rezoned to HDRZ. This supports a well-functioning urban environment consistent with the NPS-UD.
- 4.7 Argosy also notes that a number of the sites within the Area are owned by Kāinga Ora (Housing New Zealand Limited). The concentration of sites under a single development-focused landowner, combined with rezoning to HDRZ, would allow for coordinated development within the Area.
- 4.8 In addition to the above, Argosy is aware of significant investment in the Lower Hutt City Centre Zone through Te Wai Takamori o Te Awa Kairangi (formerly the RiverLink project) that seeks to revitalise the Lower Hutt City Centre through transport improvements and increasing flooding resilience. This investment, although further north, will enhance the accessibility, functionality and desirability of surrounding zones, including the Area.

5. Rezoning the Area will achieve a more compatible built form outcome with the surrounding zones

- 5.1 The Section 42A Report describes the Area as a transitional buffer between the more intensive commercial, light industrial, and high-density residential uses to the north, and the more intensive industrial uses to the south.¹⁰
- 5.2 Argosy considers that this approach results in inconsistent built form development.
- 5.3 The surrounding zones (as shown in Appendix A to this letter), including the Light Industrial Zone, General Industrial Zone, and Neighbourhood Centre Zone, propose to enable building heights of up

⁷ PDP High Density Residential Zone Chapter, 15 January 2026.

⁸ PDP Medium Density Residential Zone Chapter, 15 January 2026.

⁹ PDP, Local Centre Zone and Neighborhood Center Zone Chapters, 15 January 2026.

¹⁰ Section 42A Report – Residential Zones, 21 May 2026 at [557].

to 22 metres.¹¹ In comparison, PDP proposes to limit building height to 11 metres within the MDRZ.¹²

- 5.4 Keeping the MDRZ would therefore lead to a much lower scale of development than what is anticipated in the surrounding area. This creates inconsistent height and intensity across zone boundaries. Rezoning the Area to HDRZ would better align with the surrounding zones and support a more consistent and coherent urban form.
- 5.5 The Area is physically separated from the General Industrial Zone to the south by Waione Street. Waione Street is bordered by established vegetation, which provides a physical and visual buffer and reduces any need for an additional transitional zone.
- 5.6 In addition, there are examples in the PDP maps where a HDRZ is located directly next to the General Industrial Zone, without any form of buffer (including the HDRZ at Scholefield Street directly joined by a General Industrial Zone at Jackson Street). This shows that a transitional zoning approach is not necessary and undermines the justification for retaining the MDRZ of the Area.

6. Conclusion

- 6.1 For the reasons set out above, Argosy considers that rezoning the Area from MDRZ to HDRZ is consistent with the NPS-UD, reflects the area's accessibility to commercial activity and community facilities, and promotes a more coherent and appropriate built form outcome.

Yours sincerely

MinterEllisonRuddWatts



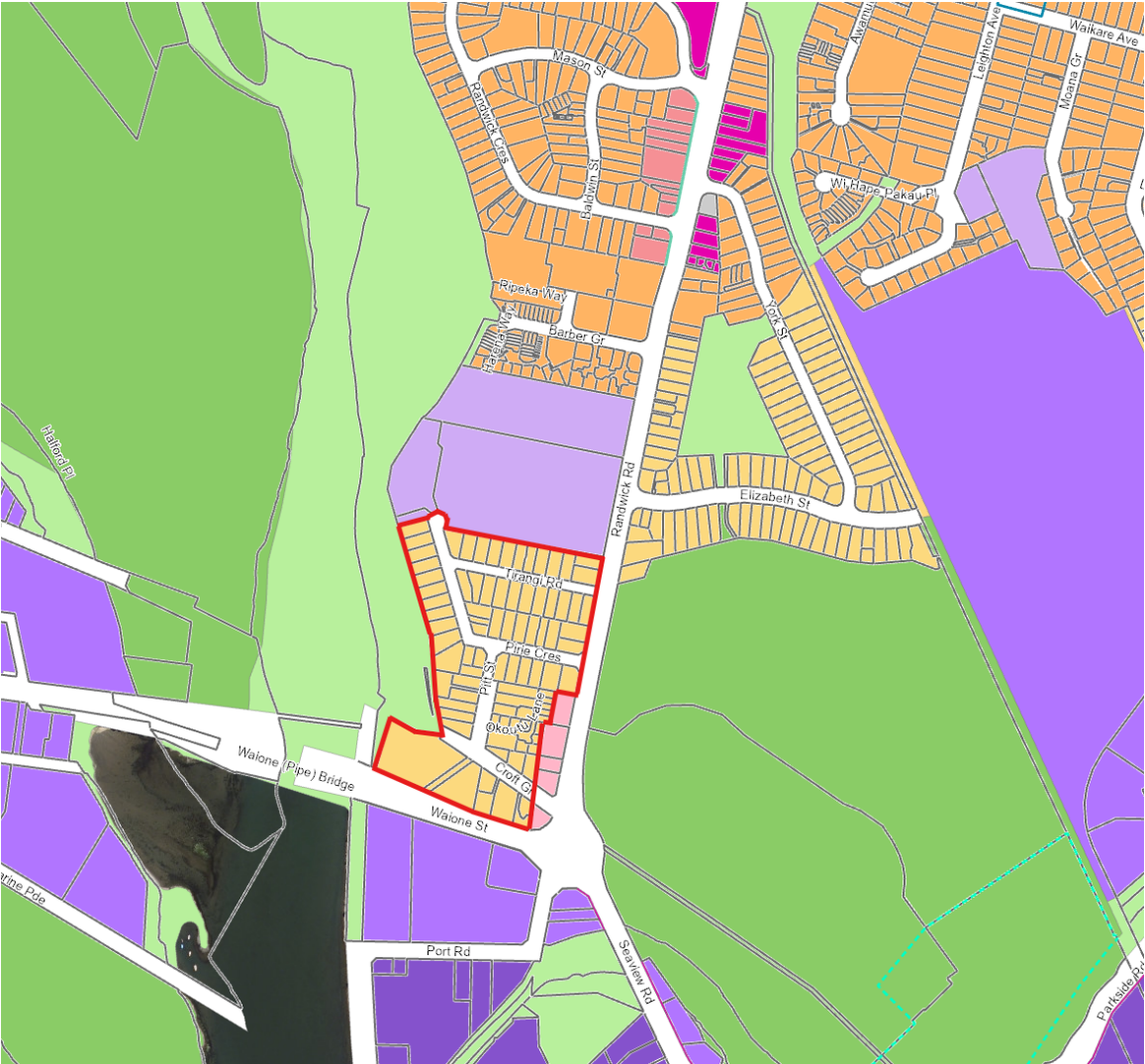
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¹¹ PDP Light Industrial Zone LIZ-S1, General Industrial Zone GIZ-S1, and Neighbourhood Centre Zone NCZ-S1, 15 January 2026.






















¹² PDP Medium Density Residential Zone MRZ-S3, 15 January 2026.

Appendix A: PDP Maps identifying the Area proposed to be rezoned HDRZ and the surrounding area



PDP Legend

Zones

- | | |
|---|--|
|  Large Lot Residential Zone |  Tertiary Education Zone |
|  Medium Density Residential Zone |  Local Centre Zone |
|  High Density Residential Zone |  Neighbourhood Centre Zone |
|  Rural Lifestyle Zone |  City Centre Zone |
|  General Rural Zone |  Metropolitan Centre Zone |
|  Light Industrial Zone |  Mixed Use Zone |
|  General Industrial Zone |  Open Space Zone |
|  Heavy Industrial Zone |  Sport and Active Recreation Zone |
|  Hospital Zone |  Natural Open Space Zone |
|  Marae Zone | |
|  Quarry zone | |
|  Seaview Marina Zone | |