

BEFORE THE HUTT CITY COUNCIL

Proposed District Plan Hearings Panel – Stream 5 – Natural Hazards

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Lower Hutt District Plan

JOINT WITNESS STATEMENT: FAULT HAZARD

Dr Nicola Litchfield and Mr David Gibson

24 September 2026

1.0 Introduction

- 1.1 This joint witness statement on the Fault Location Area has been prepared by Nicola Litchfield (for Hutt City Council) and David Gibson (for Te Kārearea Ltd and Rosco Ice Cream Ltd (PDP/447)).
- 1.2 In preparing this statement, the witnesses have read and agree to comply with the Code of Conduct for Expert Witnesses in section 7 of the Environment Court Practice Note 2023.
- 1.3 The panel issued Minute 15 relating to Hearing Stream 5 – Natural Hazards which directed that a joint memorandum be prepared to confirm the geometry of the fault location area at 30 Benmore Crescent as recommended in Dr Litchfield's evidence, including the interface of the boundary with that in areas immediately outside the site.
- 1.4 In response to the minute, and given the high degree of agreement between the witnesses, the issue was discussed via email.

2.0 Technical agreement

- 2.1 Mr Gibson in his evidence¹ of 5 August 2026 had considered the fault location area at 30 Benmore Crescent, Manor Park, in the report "Te Rangihaeata / Manor Park Development Wellington Fault Investigation Report" of Tim Haxell, Richard Cole, and Nick Peters of 7 July 2021 ("the Tonkin & Taylor report") was more appropriate than the area mapped in the PDP as notified.
- 2.2 Dr Litchfield in her evidence² of 11 August 2026 concurred.
- 2.3 To address the panel's questions, Mr Gibson provided the CAD drawings of the fault zone (grey area in the figure in the Appendix)

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<https://hccpublicdocs.azurewebsites.net/api/download/d8937615b4d04c4eabe99da68ac79ed3/dplanreview/023af6931326733c4e5db4f06fe982c3857b>

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<https://hccpublicdocs.azurewebsites.net/api/download/d8937615b4d04c4eabe99da68ac79ed3/dplanreview/b7b87e011370673a4b428440f934836f0265>

in the Tonkin & Taylor report, and Dr Litchfield converted these into GIS data in the form used for the PDP maps.

- 2.4 Dr Litchfield then prepared a new Fault Location Area overlay by first creating a 20 m buffer (setback zone) around the Tonkin & Taylor fault zone. The Fault Location Area overlay was then narrowed to the edges of the 20 m setback zone in the area of the Tonkin & Taylor fault zone and then manually tapered to a reasonable shape at either end (blue zone in the figure in the Appendix).
- 2.5 It should be noted that the transition zone between 30 Benmore Crescent and the adjacent properties to the north and south (along the faultline) remains within the Fault Location Area overlay as originally notified in the PDP. Therefore, the proposed changes to the location of the Fault Location Area does not adversely impact on the adjacent properties.
- 2.6 Mr Gibson reviewed the resulting area and concurred with Dr Litchfield's recommendation.

3.0 Conclusion

- 3.1 The witnesses agree that the boundaries shown in the Appendix and in the GIS data provided by Dr Litchfield to the HCC GIS team represent the most suitable boundaries of the Fault Location Area in Manor Park based on the evidence presented in the hearing.

Nicola Litchfield

David Gibson

24 September 2026

APPENDIX: Map of recommended revisions to Fault Location Area boundaries

