

BEFORE THE HEARINGS PANEL FOR HUTT CITY COUNCIL

UNDER the Resource Management Act 1991

IN THE MATTER of the Proposed Lower Hutt District Plan
Hearing Stream 2: Business

**HEARING DAY RESPONSE TO COMMISSIONERS
KAAREN ROSSER (PLANNING) ON BEHALF OF ENVIRO NZ**

4 JUNE 2026

1.0 INTRODUCTION

1.1 My full name is Kaaren Adriana Rosser.

1.2 I hold the position of Environmental Planner with Enviro NZ Services Limited (“Enviro NZ”). My qualifications and experience are detailed in my evidence for Hearing 2.

1.3 This statement is given in response to questions from the panel on the following matters:

- a) Alternative wording for trip-chaining under the definition for co-location benefits.
- b) “unreasonable reverse sensitivity effects” under GIZ-O2 and HIZ-O2.
- c) I also make a comment on Policy HS-P1.

2.0 Co-location benefits definition

2.1 The panel requested alternative wording to replace the word ‘trip-chaining’ in the definition for co-location benefits. The proposed alternative wording is below:

Co-location benefits - means economic, social, cultural, and other benefits that arise from activities being located close to similar activities, compatible activities, related activities, or services useful to the employees, residents, students, and visitors already in a place. Co-location benefits can include, but are not limited to, benefits from:

1. Access to a wider range of goods and services for those employees, residents, students, and visitors already in a place,
2. Easier comparison shopping,
3. **The ability to complete multiple tasks in a single trip** ~~Easier trip-chaining~~,
4. Economies of density,
5. Greater access to business-to-business services,
6. Labour pooling and matching,
7. Lower transport costs,
8. Knowledge spillovers,
9. Specialisation, and
10. The shared use of resources and infrastructure (e.g. parking spaces or public transport services).

3.0 Unreasonable reverse sensitivity effects

- 3.1 For GIZ-O2 I support the evidence of Georgina McPherson to require the “avoidance or mitigation” of reverse sensitivity effects on industrial activities. This would be preferable to not creating adverse reverse sensitivity effects as suggested in my evidence. I still consider that the tests for other activities are sufficient without the qualifiers (e)3 and 4. These qualifiers will lead to encroachment of other uses in the zone when industrial land is already in tight supply.
- 3.2 In terms of my evidence for the other submission points for the General Industrial Zone the same approach for reverse sensitivity as outlined by Georgina McPherson is supported. I also support the deletion of Policy 6 on the premise that Policy 4 adequately caters for commercial activities and Policy 6 diminishes the purpose of the zone for industrial activities.
- 3.3 For the Heavy Industrial Zone Objective 2 (HIZ-O2), again I support the evidence of Georgina McPherson to avoid reverse sensitivity effects on industrial activities. Having an unreasonable qualifier creates a value judgement and reverse sensitivity effects manifest differently from one person to another. Unreasonable for one is different for another. The Heavy Industry zone contains regionally significant industries that should have security of continuity. They should not be encroached upon by more sensitive activities.

4.0 Policy HS-P1

- 4.1 In my evidence I raised a concern in relation to the interpretation of the term “sensitive environments” in clause 3 of Policy 1. The concern was that interpretation can be broad and make it difficult to establish facilities unless the focus is further detailed.
- 4.2 I accept Mr Wesneys consideration that the clause is appropriate when considering the policy as a whole. His explanation provides examples that the term could refer to coastal margins, water bodies or constrained environments. In this context, perhaps clarification of the term to **sensitive natural environments** would cover those environmental sensitivities not captured by other categories.