

**BEFORE INDEPENDANT HEARING COMMISSIONERS
APPOINTED BY TE AWA KAIRANGI HUTT CITY COUNCIL**

IN THE MATTER **of the Resource Management Act 1991**

AND

IN THE MATTER **of hearing submissions on the Proposed
Hutt City Council District Plan**

HEARING TOPIC **Hearing Stream 3: Residential / Rural**

STATEMENT OF EVIDENCE OF KAREN WILLIAMS

ON BEHALF JOHN HAVLER (SUBMITTER 350)

PLANNING

5 JUNE 2026

1. INTRODUCTION

1.1 My name is Karen Williams. I am a Resource Management Consultant and Director at Urban Edge Planning Ltd, a Petone based planning, urban design and landscape consultancy.

Qualifications and Experience

1.2 I hold the qualifications of a Bachelor of Arts in History and Anthropology and a Graduate Diploma in Māori Studies from the University of Otago, and a Master of Resource and Environmental Planning from Massey University (1st Class Hons). I am an Intermediate member of the New Zealand Planning Institute and a member of the Resource Management Law Association.

1.3 I have close to 20 years' experience in working with resource management and planning matters under the RMA. I have worked for local government and in private consultancy. In my current role I assist a range of private and public sector clients across a range of resource management matters.

1.4 Prior to my current role I was employed by The Property Group as a Resource Management Consultant for a period of 7 years. Prior to that role, I was employed by the Wellington City Council for a period of 9 years, primarily as a Planner/Senior Planner in the Resource Consent team, and latterly within the Council's District Plan team.

1.5 I am familiar with the national, regional and district planning documents relevant to the Lower Hutt City planning context.

Involvement in John Havler's submission to the Proposed District Plan

1.6 I have been engaged by John Havler to provide Planning evidence in support of his primary submission (No. 350.1) and the Council's Section 42A Officer's Recommendation in regard to the rezoning of land at 452 Cambridge Terrace, Naenae (**the Site**).

1.7 Urban Edge Planning was engaged by Mr Havler to prepare a submission on both the Hutt City draft District Plan and Proposed District Plan (**PDP**).

1.8 While I have been engaged by Mr Havler to prepare planning evidence to support his submission on the PDP, I was not directly involved in the earlier submission work on either the draft District Plan, or the notified PDP.

- 2.1 In preparing this evidence I have considered:
- a. Hutt City Proposed District Plan;
 - b. The Havler submission on the PDP;
 - c. The Council's Section 32 evaluation for the Residential Zones; and
 - d. The Section 42A Report for Residential Zones by Kate Pascall and recommended amendments.
- 2.2 I note that the relevant statutory documents have been identified and outlined within the Section 42A reports and I agree with the identification of those matters.

Code of Conduct

- 1.9 I confirm that I have read the Expert Witness Code of Conduct contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

3 POTENTIAL CONFLICT OF INTEREST DECLARATION

- 3.1 Urban Edge Planning was involved in the preparation of a number of chapters associated with the PDP. These included:
- Natural Hazards Chapter
 - Coastal Environment Chapter
 - Outstanding Natural Landscapes and Features Chapter
 - Public Access Chapter
 - Subdivision Chapter
 - Three Waters Chapter; and
 - Earthworks Chapter.
- 3.2 I was not involved in the development of any of these chapters. This submission does not seek to change any provisions that Urban Edge Planning was involved in.

4 SCOPE OF EVIDENCE

- 4.1 Mr Havler's submission [350.1] seeks rezoning of land at 452 Cambridge Terrace from Large Lot Residential Zone (LLRZ) to Medium Density Residential Zone (MDRZ).

- 4.2 Since lodgement, the extent of rezoning sought has been refined. For the purposes of this hearing, the relief now pursued is a partial rezoning of the site, as described in the evidence of Ms Pascall and illustrated in Figure 3.
- 4.3 My evidence:
- a. addresses the appropriateness of this revised MDRZ extent in response to the Section 42A report;
 - b. considers the key planning matters relevant to rezoning, including urban integration, infrastructure, natural hazards, ecology, transport and reverse sensitivity; and
 - c. evaluates the proposal against the relevant statutory framework, including the Proposed District Plan and the National Policy Statement on Urban Development.
- 4.4 I agree with the recommendations of the Section 42A report in relation to the revised rezoning extent and provide further planning analysis in support of that position.

5 452 CAMBRIDGE TERRACE

The Site

- 5.1 452 Cambridge Terrace (**the Site**) has an area of some 7.389ha and is shown below as Figure 1. The Site is legally described as Lot 7 DP 451628.
- 5.2 The Site has access onto Cambridge Terrace via a private right of way, and frontage onto Kowhai Street, Naenae.



Figure 1. The Site at 452 Cambridge Terrace. Source: GRIP

- 5.3 The Site has strong connections to the existing urban footprint and strategic infrastructure.
- 5.4 Areas of the wider Site are variously subject to a range of notations and overlays in the PDP, including:
- a. Low Flood Hazard Overlay (inundation)
 - b. Slope Assessment Overlay
- 5.5 Figure 2 below shows the northern, southern, and western edges of the Site adjoining the existing Naenae urban area, and the Taita Cemetery to the east. It also shows the Slope Assessment Overlay (red lines), along with a small extent of the Low Flood Hazard Overlay (blue layer).

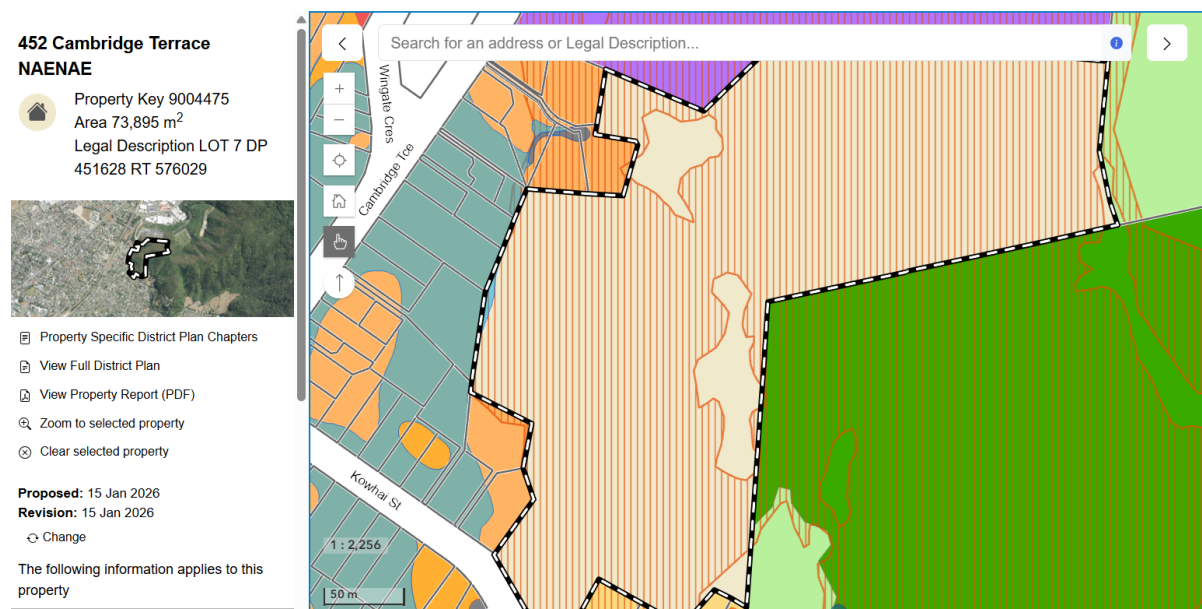


Figure 2. The Site at 452 Cambridge Terrace interfacing with the existing Naenae urban area.

- 5.6 The Site contains two dwellings and associated garaging and is otherwise largely undeveloped. The site is elevated and moderately steep, sloping up toward the east, and is largely covered in gorse and the upper slopes of the Site contain areas of regenerating native vegetation. The northeastern corner of the Site is located within the Significant Natural Resource (**SNR**) of Eastern Hills Bush under the Operative District Plan. However, as the subject site is a fee simple land holding held in private ownership, the rules pertaining to SNR's in the Operative District Plan no longer have legal effect. There is no corresponding overlay in the PDP.
- 5.7 I am familiar with the site and surrounds having most recently visited the site on 5 June 2026.

Revised relief and extent of rezoning

- 5.8 Prior to my involvement, the area for rezoning was refined by Mr Havler and I understand that it is delineated with reference to existing legal boundaries, along with the topography through the Site.
- 5.9 The revised area which Mr Havler seeks to rezone is shown in Figure 3 below (and Attachment 1). The revised MDRZ extent that Mr Havler is continuing to pursue as MDRZ is shown in yellow, with the balance of land remaining as LLRZ, and shown in orange. My evidence relates to this revised relief.



Figure 3. The area of the Site sought to be rezoned as Medium Density Residential Zone (yellow)

- 5.10 The area which is sought to be rezoned MDRZ measures some 2.4ha and adjoins existing residential zoning at Cambridge Terrace and Kowhai Street. Access to this part of the Site currently stems from Cambridge Terrace by way of an existing driveway that climbs up to recently developed residential properties. The capacity of this driveway is largely now exhausted, with future access required from Kowhai Street (refer Figure 3 for an indicative layout of future development).

5.11 The proposed split zoning applies MDRZ to the most suitable and accessible parts of the site, while retaining LLRZ in more constrained areas. This aligns the zoning pattern with the Site's physical characteristics and its relationship with surrounding urban development.

6 SECTION 42A REPORT AND EVALUATION

- 6.1 In her Section 42A report Ms Pascall has agreed in part with the Havler submission, with her agreement relating to rezoning the reduced extent of the site to MDRZ, as shown in Figure 3. Ms Pascall disagrees with the rezoning request relating to the wider site. Given my earlier comment at 3.2 above, this position aligns with Mr Havler not pursuing the full extent of his submission any further.
- 6.2 Ms Pascall's reasoning in respect of the proposed MDRZ area is set out at paragraphs 512 to 517 of her Section 42A report and I agree with her evaluation. Ms Pascall then sets out a Section 32AA evaluation at paragraph 588 of her Section 42A report and I agree with this assessment also.
- 6.3 The area proposed for MDRZ forms a logical extension of the existing urban area and provides an appropriate transition to lower density zoning. This is consistent with the conclusions reached in the Section 42A report.
- 6.4 Ms Pascall also correctly notes that the Site is well positioned in terms of access to public transport, amenities and services. The Naenae town centre is located to the southwest along Cambridge Terrace (ca. 900m distance) and provides a range of amenities. There are bus stops approximately 500m from the site, which host regular services to and from the Lower Hutt CBD. Wingate train station, approximately 400m from the site, hosts regular services to Wellington and Upper Hutt cities.
- 6.5 The area sought to be rezoned already contains two dwellings and forms part of an obvious extension to the residential development that has incrementally occurred over time at 440-451 Cambridge Terrace, all of which continues to be held in common ownership by Mr Havler. There is therefore already an established residential presence in this area of the Site.
- 6.6 The area sought to be rezoned does not interfere with the elevated portion of the site that comprises established native vegetation (being part of the Eastern Hills Bush), as confirmed by Ms Pascall.
- 6.7 There are two overlays within the PDP that apply to the subject area of the Site. One is a proposed Slope Hazard Area, while the other is a Low Flood Hazard overlay (the latter being

limited to a very small extent on the site's western boundary). Ms Pascall correctly points out that rezoning of this area does not of itself remove the impacts of these overlays.

Environmental Effects Addressed by the Rezoning Request

- 6.8 In assessing rezoning, the key issue is whether potential effects are of a nature or scale that require resolution at the zoning stage, or whether they can be appropriately managed through the district plan framework at the time of development. In my opinion, and as outlined below, the identified effects fall within the latter category.

Character and Visual Effects

- 6.9 The site forms part of an evolving urban edge within an already modified landscape. There are no highly sensitive landscape values present. Future development will result in a change in character; however, the site is capable of absorbing this change due to the established pattern of residential development in the locality. Further, while the change from LDRZ to MDRZ may create change in character in terms of enabling more intensive development, this change is not in and of itself an adverse effect, as set out in Objective 4 and Policy 6 of the NPS-UD. Overall, visual and character effects will be low.

Transport

- 6.10 Kowhai Street has sufficient capacity to safely accommodate additional traffic resulting from a future residential development of the Site. The site is located approximately 180 metres from the Kowhai Street / Cambridge Terrace intersection and approximately 100 metres from the Kowhai Street / Naenae Road intersection. Given these separation distances, additional vehicle movements are unlikely to adversely affect network performance or safety.
- 6.11 The PDP transport provisions require an Integrated Transport Assessment for larger-scale development (20 or more residential units), providing an appropriate mechanism to assess and manage transport effects at the development stage.

Three Waters Infrastructure

- 6.12 While initial engagement with Wellington Water Limited has identified some network servicing constraints, the PDP framework requires developments to demonstrate appropriate servicing capacity and mitigation. These matters are typically resolved through detailed engineering at the development stage. In my opinion, these matters do not present a constraint to rezoning.

- 6.13 In this regard, Ms Pascall correctly notes that future development will be required to address PDP requirements contained within the Three Waters chapter. I agree with Ms Pascall and note that the notified provisions of the PDP Three Waters and Subdivision chapters (Rules THW-R1 to THW-R4 and SUB-S4 to SUB-S8) regulate services provision, including network capacity, hydraulic neutrality and water sensitive urban design, and integration of development with available or planned infrastructure. These provisions are underpinned by supporting objectives and policies in the Strategic Direction, Three Waters, and Subdivision chapters of the PDP.
- 6.14 The PDP thus has in place provisions to ensure servicing is provided with sufficient capacity and levels of service and the Panel can therefore take comfort that servicing requirements will need to be appropriately addressed through a future resource consent application.

Natural Hazards

- 6.15 The site is subject to a Slope Assessment Overlay under the PDP, which represents the primary natural hazard constraint across the site. A Low Flood Hazard Overlay applies to a limited extent along the western boundary. The proposed rezoning does not alter the application or effect of these overlays.
- 6.16 The slope-related constraints are capable of being appropriately managed through site-specific geotechnical investigation and design, particularly in relation to earthworks, building platform formation, and foundation design. The PDP establishes a comprehensive, risk-based framework for managing development within natural hazard overlays, including requirements for technical assessment and mitigation. In addition, Sections 106 and 106A of the RMA provide further safeguards in relation to subdivision and development within areas subject to natural hazards.
- 6.17 In this context, natural hazard risk does not preclude rezoning and can be appropriately addressed at the development stage.

Ecology

- 6.18 The site comprises a mix of vegetation, including substantial areas of exotic species (notably gorse). While a portion of the site (within the area proposed to remain LLRZ) was previously identified by an SNR overlay, this has not been carried through into the PDP.
- 6.19 The PDP does not identify any part of the site as a Significant Natural Area (**SNA**), consistent with its policy framework. Effects on indigenous biodiversity outside SNAs are managed

through Clause 3.16 of the National Policy Statement on Indigenous Biodiversity, which applies at the development stage.

- 6.20 In this context, ecological effects can be appropriately addressed through the resource consent process and do not present a constraint requiring resolution at the rezoning stage. In my opinion, the proposed rezoning to MDRZ remains appropriate.

Reverse Sensitivity

- 6.21 The industrially zoned land to the north (2 Eastern Hutt Road) is already adjacent to High Density Residential zoning at 450 and 451 Cambridge Terrace, and the existing dwellings within 452 Cambridge Terrace, establishing an existing residential/industrial interface.
- 6.22 The proposed rezoning further manages potential reverse sensitivity effects by limiting the MDRZ extent to approximately 65 metres along the shared boundary, with the balance of the site retaining LLRZ. In addition, the primary operational areas of the industrial activity are centrally located within that site, approximately 85 metres from the shared boundary. Local topography provides further separation between potential residential development and industrial activities.
- 6.23 On this basis, the proposed rezoning will not materially increase reverse sensitivity effects beyond those already established. This is consistent with the conclusions reached by Ms Pascall.

7 STATUTORY CONTEXT

- 7.1 Zoning is a key method by which the integrated management of effects can be achieved, and the most appropriate or optimal zoning for the Site is therefore a significant consideration in achieving the sustainable management purpose of the Act. The objectives through which the purpose of the Act is to be achieved stem from the zoning that is ultimately applied.

National Policy Statement on Urban Development

- 7.2 The proposed rezoning is appropriate and consistent with the relevant provisions of the National Policy Statement on Urban Development (**NPS-UD**). Specifically:
- a. The rezoning will contribute to a well-functioning urban environment given the proximity of the Site to nearby services, amenities and public transport. Subsequent residential development of the Site will in turn will allow future residents to provide for their social,

economic and cultural wellbeing in accordance with Objective 1 and Policy 1 of the NPS-UD;

- b. Rezoning of the Site will enable its subsequent residential development. This increase in overall residential supply will contribute to realisable development capacity in accordance with Policy 2. It will also support the competitive operation of land and development markets, and in turn will improve housing affordability through an increase in supply, consistent with Objective 2 of the NPS-UD;
- c. Objective 3 requires regional policy statements and district plans to enable more people to live in areas of an urban environment where the area is in or near a centre zone, is well-serviced by existing or planned public transport and where there is high demand for housing.

The proposed rezoning achieves consistency with Objective 3 given its proximity to the Naenae town centre and the availability of significant public transport routes within an easily walkable distance.

- d. Objective 6 requires local authority decisions on urban development affecting urban environments to be:
 - (i) Integrated with infrastructure planning and funding decisions; and
 - (ii) Strategic over the medium term and long term; and
 - (iii) Responsive, particularly in relation to proposals that would supply significant development capacity.

In turn, Policy 8 requires local authority decisions affecting urban environments to be responsive to plan changes that would add significant development capacity and contribute to well-functioning urban environments, even if the development capacity is unanticipated by RMA planning documents or is out of sequence.

The proposed rezoning is consistent with Objective 6 and Policy 8 as it represents a responsive planning outcome that enables additional development capacity in a location that is well connected to existing infrastructure and services. The rezoning is supported by the Site's proximity to transport, servicing networks and the existing urban area, and can be integrated with infrastructure planning through the established district plan and resource consent framework.

- e. Policy 6 requires decision-makers to have particular regard to a range of matters, including:
 - (i) The benefits of urban development that are consistent with well-functioning urban environments;
 - (ii) Any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity.

The proposed rezoning would contribute to a well-functioning urban environment, and would make a contribution to the overall availability of residential development capacity in the city.

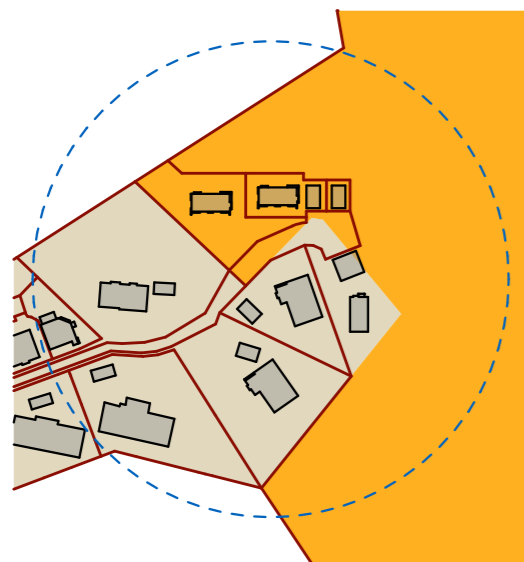
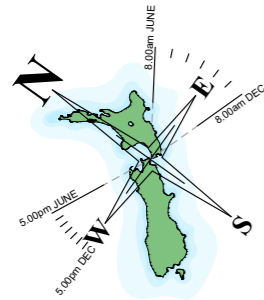
8 PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN

- 8.1 Greater Wellington Regional Council notified Proposed Change 1 (**PC1**) to the Natural Resources Plan for the Wellington Region (NRP) in late 2023.
- 8.2 The site is identified as a 'Planned/Existing Urban Area' under PC1. As a result, the prohibited activity rule relating to unplanned greenfield stormwater (WH.R13) does not apply.
- 8.3 Accordingly, no additional regional plan change is required in this instance.

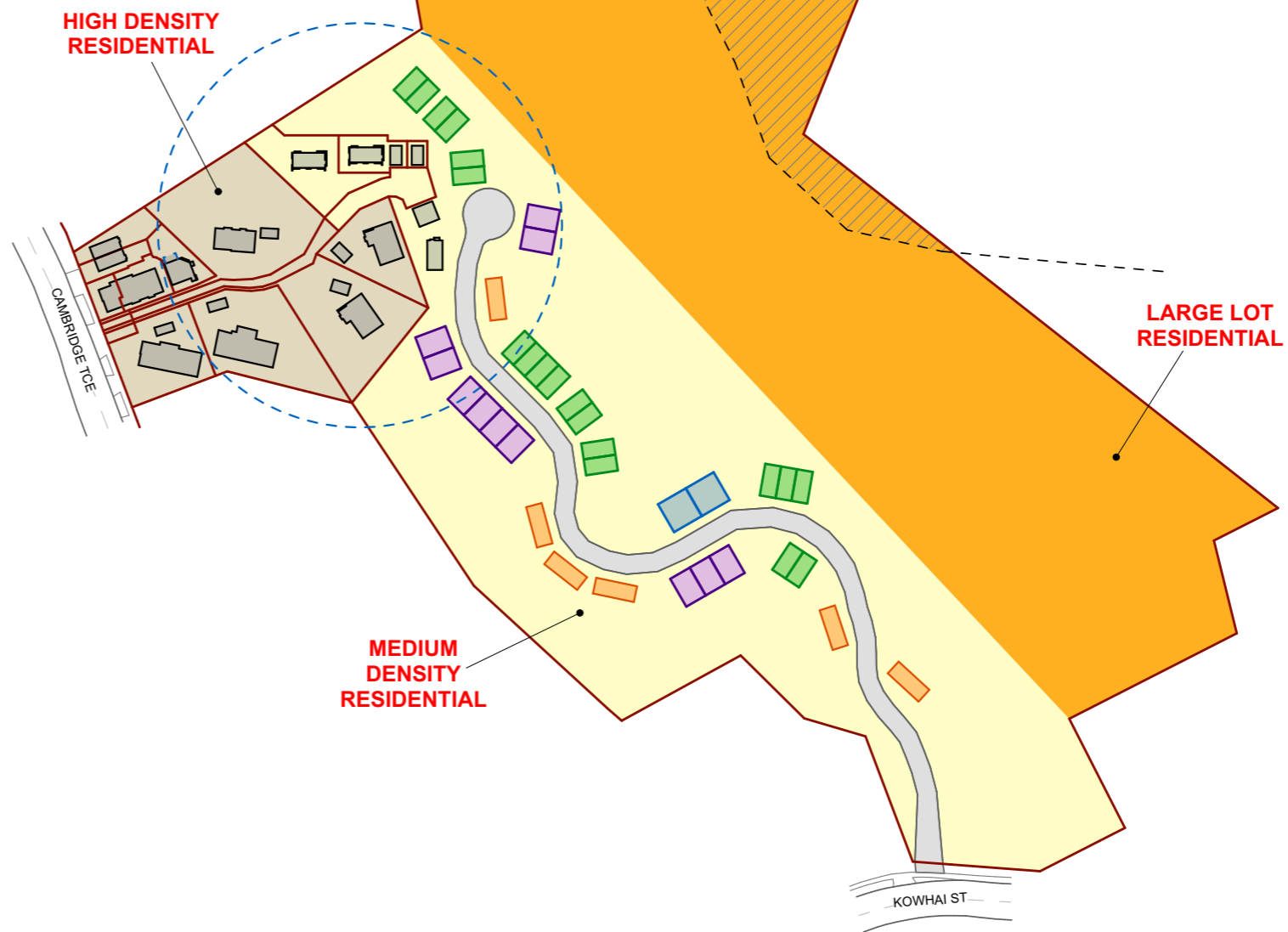
9 CONCLUSIONS

- 9.1 From a planning perspective, the proposed split zoning represents a proportionate and site-responsive outcome. It enables development in the most suitable and accessible parts of the site while retaining lower density zoning in more constrained areas. This approach aligns with the direction of the NPS-UD, reflects the existing pattern of urban development, and ensures that detailed design and infrastructure matters are addressed through the established consenting framework. In this respect, MDRZ is the most appropriate zoning response.
- 9.2 Overall, the proposed partial rezoning of the Site to MDRZ represents an efficient and effective outcome, and is consistent with the purpose of the RMA, the relevant objectives of the District Plan, and the direction provided by the NPS-UD.

Karen Williams
5 June 2026



EXISTING ZONING



INDICATIVE DEVELOPMENT

PROPOSED SUBDIVISION
452 CAMBRIDGE TERRACE
LOWER HUTT

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