

**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 to fully identify all relevant submitters for issues identified within the S.42A report. WRCAI has not fully been able to identify all the relevant omissions but notes with concern that the omissions appear to be extremely extensive. WRCAI strongly objects to the failure to include a reference to its submission in relation to all relevant topics were this occurs. A tentative check of the individual submissions of rural property owners suggests that the issue is widespread.
  - 1.a) WRCAI notes with concern that its support of the submission of Ken Jackson requesting a reduction of the subdivision limit within the General Rural zone be reduced to 7 hectares is not mentioned in the S.42A report [S.42A p. 57]. WRCAI notes with concern that this appears to be only one of many omissions with regards to references to its submission.
  - 1.b) WRCAI repeats its submission that the minimum lot size for General Rural Zone be decreased to seven hectares on the grounds that this reduces the disparity between General Rural Zone and Rural Residential Zone.
2. WRCAI continues its objection to the zoning of the large parcels at the end of Moores Valley to Rural Residential zone [S42A 4.2.9 p.33] and notes a relevance to the objection of residents to the General Rural Zone for Crowther Road [See Maps 1-5] .
  - 2.a) The parcels relevant to these objections include the parcels adjacent to the parcels primarily within the valley of Moores Valley and in the north-eastern Wainuiomata valley area:
    - a. Lot 55 DP 89549
    - b. Lot 60 DP 354855
    - c. Lot 5 DP 583117
    - d. Lot 4 DP 583117
    - e. Lot 3 DP 583117
    - f. Lot 4 DP 80089
    - g. Lot 101 DP 502368
    - h. Lot 20 DP 302320
3. 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 as zoning and the potential follow-on 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 this hearing. Landowners cannot access the layer and cannot effectively engage with this process as a result.

4. WRCAI notes with concern that there is no mention of the limitations of the Land Use Capability [LUC] data. This data is old and was in any case created for 1:50,000 maps. Applying the data in the way that HCC has done is entirely inappropriate for the northern parts of Wainuiomata and is marginal in the southern part.
5. The S.42A report [pp.17-18] states that the size of allotments is not a factor when considering the application of the Highly Productive Land overlay. However, how properties interrelate with course GIS data absolutely must be. Applying the overlay in a wider context of LUC 1 and LUC 2 and taking into the account the limitations of the sampling and the fact that the data is derived from 1:50,000 analogue maps might potentially support the inclusion of some areas based upon LUC 3. However, on Crowther Road even if all of the effected areas were amalgamated together they still could not be considered to be realistically Highly Productive Land in any real sense. The situation on Coast Road is equally clear. There is nothing in the recent history of the area to suggest that the intersection with the LUC 3 data is anything other than an artefact of a GIS dataset that is marginal at best for the edge cases.
6. With regards to the submissions of the residents of Crowther Road, WRCAI notes that the S.42A report ignores the situation for the properties on the north-eastern part of Wainuiomata North [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.
  - 6.a) Properties this area are General Rural in the operative District Plan but are proposed Rural Lifestyle in the proposed District Plan:
    - 6.a.a) Lot 5 DP 583117
    - 6.a.b) Lot 4 DP 583117
    - 6.a.c) Lot 3 DP 583117
    - 6.a.d) Lot 4 DP 80089
    - 6.a.e) Lot 101 DP 502368
    - 6.a.f) Lot 20 DP 302320
  - 6.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.
  - 6.c) The parcels in Wainuiomata North are relatively more constrained than the Crowther Road properties in terms of slope.
  - 6.d) The parcels in Wainuiomata North are relatively more constrained than the Crowther Road properties in terms of road access.

- 6.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>)..
7. With regards to the two large parcels on the north-western side of Moores Valley (Lot 55 DP 89549 and Lot 60 DP 354855 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. 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:
- 7.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 zoning in the operative plan and the proposed plan must be considered in the light of this fact.
- 7.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].
- 7.c) The consulting company Wildlands has 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.
- 7.d) Kiwi calls have been heard within the area being proposed 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>).
- 7.e) 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].
- 7.f) 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 occurred at this location.
8. With regards to 57 Stockdale Street [S42A 4.2.9 p.33], it was discovered during the East Harbour Environmental Association v Hutt City Council hearing that the zoning of many areas from rural to Hill Residential zone was undertaken without due process and was not previously indicated in the proposed District Plan as it was originally published. Therefore, the position of all areas zoned Hill Residential in the operative District Plan require additional scrutiny.

**Where these issues are relevant to Hearing 3, WRCAI repeats its original submission:**

9. WRCAI supports the submission of Federated Farmers.
10. WRCAI object to the Highly Productive Land overlay being applied to rural properties.
11. We object to the extent of the proposed Sites of Significance to Maori for private land in the rural areas. We ask that the sites of significance be limited to those associated with statutory acknowledgement in Treaty settlements and the acknowledgement of specific long identified sites.
12. We object to the Slope Overlay being applied to rural properties.
13. WRCAI repeats its objection to the minimum lot size of one hectare for the Rural Lifestyle Zone on the following grounds:
  - 13.a) Water and air pollution.
  - 13.b) Electricity supply and infrastructure.
  - 13.c) Road usage, including the increased dangers of rubbish collection.
  - 13.d) Effects on the rural character of the area.
  - 13.e) Effects on production in the General Rural Zone.
  - 13.f) The wide disparity between the allowable subdivision between Rural Residential and General Rural Zones.
14. WRCAI supports the retention of a 2 hectare minimum lot size for Rural Residential Zone.
15. WRCAI wants clarity that there is no right of public access over private land. We urge council to work with Walking Access Commission to remove tracks shown over private land.
16. WRCAI opposes Flood Overlay for rural properties in Wainuiomata North.
17. WRCAI supports the easing of earthworks restrictions and urge some further lifting of some restrictions in some instances.
18. WRCAI opposes consent free fence limitation for the construction of fences to wire and post fences. Post and rail fences should be subject to same rules. Fences and boundary fences should be consent free.
19. WRCAI submits that building restrictions provisions are too tight for General Rural zone.
20. WRCAI supports the easing of restrictions for farm tracks.

Craig Innes,  
Chairman

**Wainuiomata Rural Community Association Incorporated**