

**Before the Hearings Panel
At Hutt City Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of the Proposed Lower Hutt District Plan

Between **David Gibson**

For Te Kārearea Ltd and Rosco Ice Cream Ltd

And **Hutt City Council**

Respondent

**Statement of evidence of Dr Nicola Jane Litchfield on behalf of Hutt City
Council**

Date: 11 August2026

INTRODUCTION

- 1 My full name is Dr Nicola Jane Litchfield. I am employed as a Principal Tectonic Geomorphologist / Earthquake Geologist at the New Zealand Institute for Earth Sciences (ESNZ), Lower Hutt, New Zealand. ESNZ was formerly known as the Institute of Geological and Nuclear Sciences Limited (GNS Science).
- 2 I have prepared this statement of evidence on behalf of Hutt City Council in respect of technical related matters arising from exchange of evidence for the hearings on the Proposed Hutt City District Plan (**PDP**).
- 3 Specifically, this statement of evidence relates to the matters in Chapter NH - Natural Hazards where it relates to active fault hazards.
- 4 I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS AND EXPERIENCE

- 5 I hold the qualifications of Doctor of Philosophy (Geology – 2000) from the University of Otago, a Master of Science with First Class Honours (Geology – 1996) from the University of Canterbury, and a Bachelor of Science (Geology – 1993) from the University of Canterbury.
- 6 I have worked for ESNZ, and predecessor organisations for over 25 years including 4 years as a New Zealand Science and Technology Post-doctoral fellow (2001-2004) and currently hold the role of Principal Tectonic Geomorphologist / Earthquake Geologist.
- 7 Since 1995 I have been involved in multiple active fault mapping, paleoseismology and fault characterisation studies, seismic hazard assessments and providing active fault expert evidence.

- 8 I have led active fault mapping studies for District Plans for Whakatāne, Upper Hutt City, Porirua, Kaikōura, Taupō, Wairarapa Councils, and Tairāwhiti / Gisborne Districts, and have reviewed studies for other regions (Hawke's Bay, Horizons, West Coast, Marlborough, Canterbury, Otago).
- 9 Paleoseismology studies have included trenching studies of active faults around New Zealand (e.g., Wellington, Ohāriu, Masterton, Papawai, Alpine, Dunstan, Akatore, Titri, Mohaka Faults and several in the Taupō Rift).
- 10 I have provided active fault expert evidence for the Porirua City Council Proposed District Plan and Appeals, the Wellington City Proposed District Plan and the Wairarapa Combined District Plan.
- 11 I am a member of the Geoscience Society of New Zealand, Seismological Society of America, American Geophysical Union, and New Zealand Archaeological Association.
- 12 I lead the award-winning It's Our Fault: Nō Mātou Te Hapa programme aimed at improving resilience to earthquakes and associated hazards throughout the Wellington Region.

CODE OF CONDUCT

- 13 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Hearings Panel. My qualifications as an expert are set out above. Except where we state we rely on the evidence of another person, we confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SUMMARY

- 14 My name is Dr Nicola Jane Litchfield
- 15 I have been asked by Hutt City Council to provide evidence in relation to active fault statement of evidence lodged by David Gibson for Te Kārearea Ltd and Rosco Ice Cream Ltd PDP 447-Planning.

FAULT LOCATION AREA OVERLAY

- 16 The submitters statement of evidence recommends that the mapping of the Wellington fault location area within the site to be adjusted (their point 14).
- 17 They further clarified that the proposed mapping of the fault location area should be consistent with the Tonkin and Taylor mapping of the faultline plus a 20 m setback area within Benmore Crescent as per their report "*Te Rangiheata / Manor Park Development Wellington Fault Investigation Report*" dated 7 July 2021.
- 18 The 2021 Tonkin and Taylor report was supplied as part of the evidence.
- 19 I have reviewed the 2021 Tonkin and Taylor report and I consider the methodology and findings are appropriate to refine the Wellington fault location area at the site.
- 20 I therefore agree with recommendation contained within the submitters evidence and propose amending the fault hazard overlay in the PDP and the fault avoidance zone held by ESNZ using the Tonkin and Taylor data, plus a 20 m setback area, as illustrated in Figure 1.
- 21 The amendment shown in Figure 1 is illustrative for the purpose of this statement of evidence and the final amendment should be made using the GIS data from the 2021 Tonkin and Taylor study.

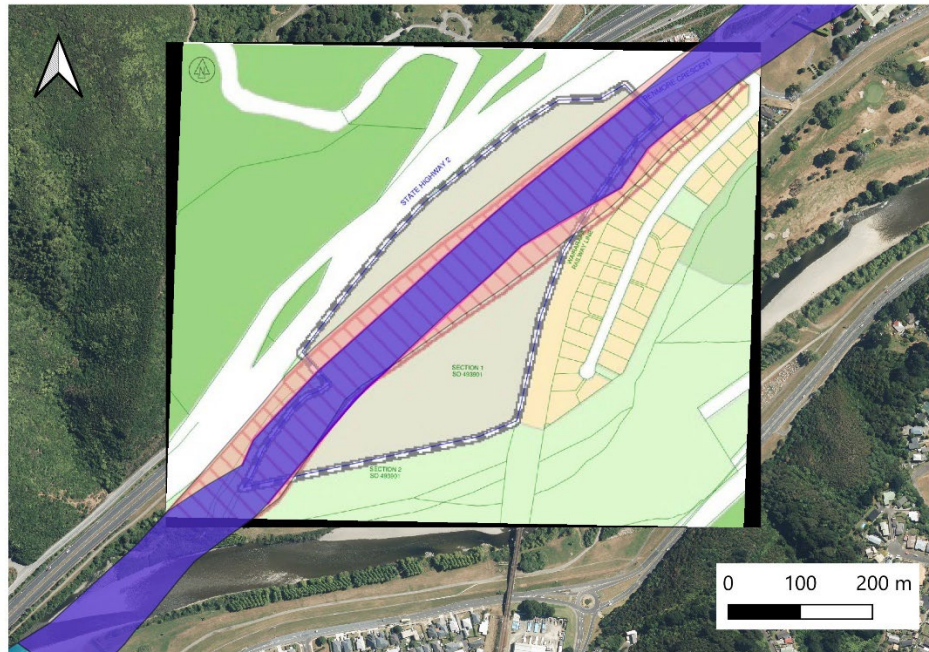
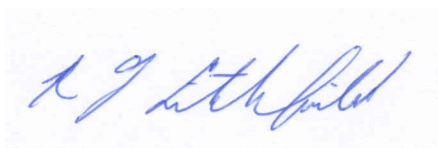


Figure 1: The blue polygon is a draft of the revised Wellington fault hazard overlay / fault avoidance zone. The previous zone is in salmon pink. The revised overlay/zone is based on georeferencing the map in the statement of evidence. The actual overlay/zone should be revised using the Tonkin and Taylor GIS data plus a 20 m setback zone.

Signed:

A handwritten signature in blue ink, appearing to read "K. J. L. H. Field", is written on a light blue background.

Date: 11 August 2026