21/8/26
IN THE MATTER /CASE OF OFFICIAL APPLICATION TO THE CHAIR -HAZARD PLANNING COMMITTEE HCC SLOPE STABILITY SUBMITTER 122 21/08/26.

APPLICANT -REQUESTING REMOVAL OF GENERAL SLOPE STABILITY HAZARD DUE TO WWL EXPERT REPORTS REMOVING SAME COMPONETRY HAZARDS TABLED BY APPLICANT 122 IN CONTEXT EVIDENCE .

AND/OR context evidence submitted by the applicant that emphatically Proves widespread errors in initial agencies working re alleged hazards ,portal error information pursuant to submitted evidential apologies ,admission of errors and correction of portal sources - HCC informed /indicate they relied on.

Attachment by paste in point 12 - email Letters from HCC Nathan Geard Thursday January25 2024 3.39pm HCC Nathan Geard Thursday January30 2024 8.47am

:Note WWL were referred to /were introduced as /represented as ,by HCC Mr Geard as experts in the field so we have the right to treat their reports to us as expert witness context evidence and thus -has been duly filed on the committee as such .

This is especially so as HHC accepted the WWL report findings and removed the alleged specific flooding and inundation hazards from the property and town hazard plan proving the major [necessary]components of slope stability flooding and inundation do not exist on the property .

"By stripping out the flooding hazard, the Council legally admitted the water componentry does not exist here. Because WSP's general slope hazard relies on that exact same discredited water data to calculate risk, the slope hazard automatically suffers from a fatal data defect under Section 32. You cannot legally use a broad-brush model to override property-specific empirical retractions from Wellington Water and the Regional Council." **[1]**

The applicant submits and will detail more specifically at the hearing that the current generic slope hazard is not based on rigorous localized science but is a duplication of an already-disproved flooding model.

Dear Chair/Panel
[1] I have attached these letters I intend to rely on in my 30 minutes speaking time .
[2]Thus proving the applicant followed the review process set down by HCC :for the WWL site review of the alleged property specific hazards and their WWL expert subsequent reports.

[3]Thus proving HCC endorsed and applied these WWL expert reports by formally removing flooding /inundation specific hazards from the property of 23 Pomare Road Tirohanga and the Town hazards plan .
NOTE: So, they do not go astray as seemingly is an ongoing problem these emails are paste below with in this document .

[4]] already I have entered into evidence The OIA release from HCC which explained what HCC relied on [at that time] to support the affixing of alleged flooding and inundation hazards on my property -namely the NHC hazard portal.

CONTEXT EVIDENCE NOTES:
[5][NHC has apologised in writing to the applicant for incorrect information on this portal and entered correction notices on the portal and both have been entered into file as context evidence]

[6]NOTES : GWRC & NHC have corrected and replaced incorrect adverse flooding maps about our property and GWRC have formally stated that their flooding model does not impact on our property, and this has been filed by the applicant as context evidence .

[7] NATURAL JUSTICE /PROCEDURAL FAIRNESS
We have checked the relevant authority's information on submitters Natural Justice rights .

Thus, as part of my speaking time will be spent on covering how I believe the Forum system has oppressively withheld my natural justice rights I request the Chair /panel to reconsider their refusal to consider the writers official requests .

[8]I submit -by the committee not responding to the applicant submitter 122 ,legitimate official filings & requests for information and clarifications regarding HCC expert WSP witness docs and off the record rulings by the committee chair -which are imperative to being able to state my case fairly.

BACKGROUND :Applicant has made requests for such informal rulings by the committee to be properly placed on the on-hearing file and the clarifications requests about HCC expert witness rebuttal because they appear to have been carried out informally off the record .

[9] Thus, the applicant submits this interferes with the applicant's natural justice rights to be advised about the alleged HCC case evidence against his property and /or be advised when or how the committee will ask the questions posed by the applicant about the WSP rebuttal and what will those discretionary questions state .

[10]We cover this again and specifically refer to the official filings not responded to by the Chair/panel which interfere with submitter 122 Natural Justice rights and his ability to be able to fairly produce evidence dialogue in the speaking time .

[11]We ask the chair /panel to give the clarity requested /response in the following filed document before the applicants speaking hearing time .

[11.1] :with respect the applicant submitter 122 does not and cannot argue with the right for the Committee chair to run the panel as he sees fit as we are aware the chair has wide discretionary powers to do so *with the exception of course* -that such implementation of

<u>powers cannot interfere with the applicants human rights /</u> NATURAL JUSTICE /PROCEDURAL FAIRNESS rights which the applicant submits this issue does .

Refer: document filed dated 15th AUGUST 2026 addressed to chair and panel.

[12]PASTE DOCUMENT HCC EMAILS
Refer below: HCC directions/instructions to the applicant of the way to check hazard validity and the connection to the filed OIA evidence context of LUCY HOGINS OIA release clarification -where it was informed HCC got their alleged hazard information from NHC HAZARD PORTAL

25/01/24 3:39 pm
Hi John – Lucy has forwarded your email on to me to respond to (she's busy this afternoon tidying up a couple of things).

I don't recall if you and I have ever spoken directly, but by way of introduction, my name's Nathan Geard and I manage the Council's District Plan team. I've been assisting in the background with some of your information requests.

I can confirm that the general list of hazards that was included in the initial letter that you received was not a list of hazards for your property, and that the hazard areas that have been identified for your property are:

- The area for the earthquake fault line (which we refer to as the Wellington Fault Hazard Overlay), and
- The Inundation Area (mentioned in Lucy's email from earlier today).

Hopefully this clarifies the situation.

Kind regards

Nathan

Nathan Geard
Policy Planning Manager
Hutt City Council, 30 Laings Road, Hutt Central, Lower Hutt 5010
P: 04 570 6996 **M:** **W:** www.huttcity.govt.nz

From: Nathan Geard <Nathan.Geard@huttcity.govt.nz>
Sent: Tuesday, January 30, 2024 8:47 AM
To
Subject: RE: [EXTERNAL] 23 Pomare Road Tirohanga/ proposed Inundation hazard area

Kia ora John

I certainly appreciate your concerns (and the concerns of your neighbours) around an inundation risk area being identified on your property in the District Plan.

The areas that we've identified as being in inundation risk areas is based on a flood model that has been prepared by Wellington Water. This is the model that informs inundation risk for all development in Lower Hutt, Upper Hutt, Wellington and Porirua.

I think the best way for us to move forward is to have the modelling experts from Wellington Water to review why the model has identified an area on your property (they are undertaking several similar reviews for us over the next couple of months). Once they've had a chance to review it (including the information that you have provided to us) we will be able to get back to you.

In the meantime, if you have any further information that you'd like them to be aware of, feel free to email it to me.

Kind regards

Nathan

Nathan Geard
Policy Planning Manager

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J WADHAM SUBMITTER 122 21/0/26 Re 23 POMARE RD TIROHANGA