

From: [REDACTED]
To: [District Plan Review Team](#)
Subject: [EXTERNAL] Submission for draft district plan review
Date: Friday, 15 December 2023 11:16:06 am
Attachments: [HCC Draft District Plan Submission.pdf](#)

Hi Team,

Please find attached my submission for the draft district plan review. I haven't done one of these before and have no idea how to format or what to include but this is the best I could do.

Thanks

[REDACTED]

SUBMISSION ON
HUTT CITY COUNCIL - DRAFT DISTRICT PLAN

To: Hutt City Council
By email to: district.plan@huttcity.govt.nz

Submission on: Draft District Plan

Name of Submitter: Urban Edge Planning Ltd
on behalf of The Wellington Company

Address for service: Urban Edge Planning
PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

Attention: Corinna Tessendorf
022 304 4187
Corinna@urbanedgeplanning.co.nz

- This is a submission made on behalf of The Wellington Company concerning the Draft District Plan as notified by Hutt City Council on 9 November 2023.
- The specific provision of the Draft District Plan that this submission relates to is the proposed zoning of the site at 41 Percy Cameron Street and the surrounding properties on Taita Drive and Percy Cameron Street (currently zoned as Avalon Business Activity Area) as Light Industrial Zone.
- Urban Edge Planning on behalf of The Wellington Company seeks that the site at 41 Percy Cameron Street and surrounding properties at Taita Drive and Percy Camron Street, Avalon, that are currently zoned Avalon Business Activity Area be rezoned as Mixed Use Zone.

SITE CONTEXT

This submission relates to the site at 41 Percy Cameron Street and surrounding properties along Taita Drive and Percy Cameron Street, Avalon that are currently zoned Avalon Business Activity Area.



Figure 1: Grip

The area can be described as follows:

Address	<ul style="list-style-type: none"> ▪ 41 Percy Cameron Street ▪ Wider Taita Drive / Percy Cameron Street area including <ul style="list-style-type: none"> ♦ 181, 181A, 181B, 199 Taita Drive ♦ 37, 39, 45, 1/55 to 46/55 Percy Cameron Street
Size	<ul style="list-style-type: none"> ▪ 41 Percy Cameron Street – 4668m² ▪ Wider Taita Drive / Percy Cameron Street - approximately 7ha
Title	41 Percy Cameron Street:
Parcel ID	1028422
Legal description	8319976
Location	Lot 2 DP 569885
Operative DP Zoning	On the corner of Taita Drive and Percy Cameron Street, former Avalon Studios
Operative DP Overlay	Avalon Business Activity Area
Operative DP Overlay	<ul style="list-style-type: none"> ▪ Flood Hazard Overlay - Inundation Area

Draft DP Zoning	Light Industrial Zone
Draft DP Overlays	<ul style="list-style-type: none"> ▪ Heritage Site – Avalon TV Studios ▪ Flood Hazard Overlay - Inundation Area ▪ Industrial Main Through Route Frontage Overlay along Percy Cameron Street ▪ Specific Height Control Overlay - 12 metres
Current Use and Development	<ul style="list-style-type: none"> ▪ 41 Percy Cameron Street <ul style="list-style-type: none"> ◆ Avalon tower – undergoing redevelopment for residential use (Avalon Apartments) ▪ Wider Taita Drive / Percy Cameron Street area including <ul style="list-style-type: none"> ◆ Avalon Film & Television Studios ◆ NZ Film Archives - TVNZ Collection, Ngā Taonga Sound & Vision ◆ Avalon Business Park – Work & Living ◆ Several commercial and industrial businesses
Surrounding Area	<p>The area is surrounded by the Te Awa Kairangi / Hutt River corridor to the north, Fraser Park to the east, residential to the south and a retirement village to the west.</p> <p>Current Zoning</p> <ul style="list-style-type: none"> ▪ River Recreation Activity Area to the north ▪ General Recreation to the east ▪ High Density Residential Activity Area to the south ▪ Medium Density Residential Activity Area to the south and west <p>Proposed Zoning</p> <ul style="list-style-type: none"> ▪ Open Space Zone to the north ▪ Sport and Active Recreation Zone to the east ▪ High Density Residential Zone to the south ▪ Medium Density Residential Zone to the south and west

PLANNING CONTEXT

Operative District Plan

Under the Operative District Plan the site at 41 Percy Cameron Street and the surrounding properties are zoned as Avalon Business Activity and are partially subject to the Flood Hazard Overlay – Flood Inundation that has recently been introduced as part of the Plan Change 56 process.

The Avalon Business Activity Area was initially introduced to cover the Avalon Television Centre on Percy Cameron Street and the National Film Unit on Fairway Drive. The intention of the zone was to provide for the unique nature of activities that existed on the sites, including film related activities, television production and broadcasts, other telecommunication activities (including those associated with satellite communications), a computer business, film processing laboratories and administrative and office functions for the above activities. It also provides for a mix of activities not necessarily associated with television and film production and broadcasting activities, but consistent with their effects. However these activities have the potential to change the character of the area and of generating effects which require consideration in terms of the amenity values of the adjoining residential and recreational areas.

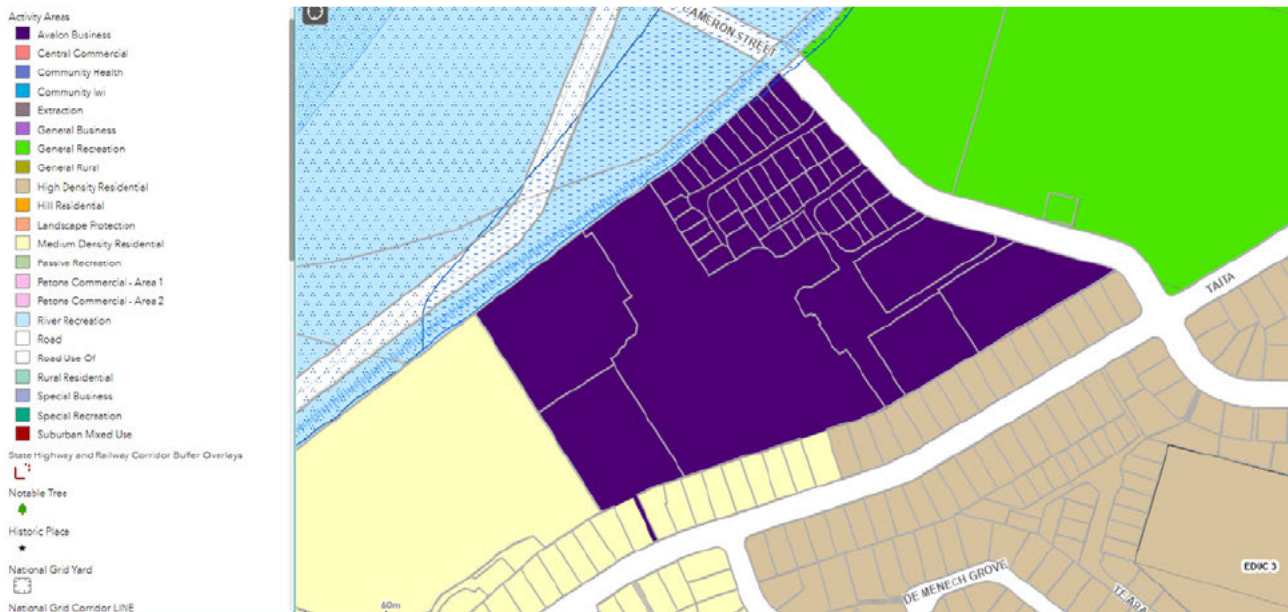


Figure 3: Avalon Business Activity Area – Operative District Plan (Source: HCC GIS Viewer)

Draft District Plan

Under the Draft District Plan the site at 41 Percy Cameron Street and the surrounding properties are proposed to be zoned as Light Industrial Zone. The following Overlays apply:

- Heritage Site – Avalon TV Studios
- Flood Hazard Overlay – Inundation Area
- Industrial Main Through Route Frontage Overlay along Percy Cameron Street
- Specific Height Control Overlay – 12 metres

The site is also subject to the Mana Whenua Statutory Acknowledgement overlay but no other overlays or precincts apply.

The proposed Light Industrial Zone is described as covering smaller and more fragmented industrial areas that often have smaller lot sizes than the General or Heavy Industrial Zone. It recognises the need for industrial areas to be sometimes located close to residential Areas and also provides for commercial activities that are unsuitable for commercial areas. The Light Industrial Zone provides for some residential activities where there are co-location benefits, but in general purely residential developments should be avoided to preserve development capacity for industrial activities in the long term.



Figure 3: 41 Percy Cameron Street and surrounding Light Industrial Zone – Draft District Plan (Source: HCC GIS Viewer)

Current Use and Development

The area currently accommodates a range of commercial, light industrial and residential activities located in a variety of buildings ranging from small commercial/residential units to the 10-storey Avalon Tower that is currently being converted into apartments.

Site History

The two main buildings in the area are the 10-storey tower and single-storey warehouse-style building were constructed in the late 1960s and early 1970s. The Avalon Tower was officially opened in 1975.

When the complex was first built it was New Zealand's principal centre for television broadcasting and administration.

TV NZ gradually moved shows and administration to Auckland and the site was eventually sold in 2013.

The National Film Unit was purpose built in the late 1970's for the then state-supported film industry. It consisted of a three storey office block, with studios, laboratories, workshops, associated film facilities areas and a cinema complex.

SUBMISSION

Submission

This submission opposes the proposed zoning of the site at 41 Percy Cameron Street and the surrounding properties as Light Industrial Zone as proposed by the Draft District Plan and instead requests the zoning as Mixed Use Zone.

The current zoning as Avalon Business Activity Area under the Operative District Plan reflects the previous use of the site as TV and Film Studios and provides specifically for related activities. Since

the initial zoning was introduced the actual use of the site has changed significantly – TV NZ moved all studios and shows to Auckland in 2013 and the sites and buildings have been sold.

While the large warehouse style building is currently occupied by Avalon Film & Television Studios, the Avalon Tower is currently undergoing redevelopment for residential use and is marketed as Avalon Apartments.

The north-eastern corner of the area has recently been developed to contain a business park which provides for commercial and light industrial activities combined with residential activities.

The Light Industrial Zone as proposed by the Draft District Plan mainly provides for light industrial activities and research activities as well as those commercial activities that are generally incompatible with other commercial centres. It does not allow for residential activities unless they are ancillary to industrial activities or are occupy less than 50% of a building.

The already consented residential use of the Avalon tower would therefore not be supported by the proposed policy and rule framework of the Light Industrial Zone. It is also considered that the Light Industrial Zone would unduly limit the redevelopment options for a significantly large area.

The Mixed Use Zone as proposed by the Draft District Plan is considered to be a much better match for the previous Avalon Business Area. It would better align with the consented and partially realised residential redevelopment intentions for the Avalon Tower while also providing greater flexibility for the existing and future use and development of the wider area.

Furthermore the area is directly abutting residential properties to the south and west and the Mixed Use Zone is considered to provide better options for transitional activities and to manage adverse effects along the zone boundary.

The requested Mixed Use Zone would reflect the wide range of existing and consented activities (including commercial, residential and light industrial) and allow for the ongoing transition of the area over time. It would fit well with the diverse environment the site is located within.

All of the above seems to align well with the intentions of the Mixed Use Zone as outlined in the Introduction:

The Mixed Use Zone covers a large variety of different areas across the urban area of Lower Hutt that call for flexible land use controls. Common scenarios include:

- *The fringes of commercial centres, to provide for expansion and contraction of those centres,*
- *Very small commercial centres,*
- *Some areas that have a long history of mixed uses,*
- *Sites with unique businesses or facilities,*
- *Areas that form a spatial transition between two other areas,*
- *Areas that are transitioning in time from one role to another,*
- *Areas with strong potential to develop into centres, and*
- *Corridors connecting other centres with good access to public transport that have the potential to serve the surrounding area.*

Of the listed scenarios above the 'Areas that are transitioning in time from one role to another' seems to be particularly relevant.

We also consider the proposed objectives of the Mixed Use Zone to be supportive of the requested rezoning.

Objective 1 of the proposed Mixed Use Zone describes the purpose of the zone as follows:

Mixed Use areas provide flexibility for any combination of commercial, community, light manufacturing and servicing, recreational, residential, and other compatible activities, while reflecting the Mixed Use Zone's role and function in relation to the hierarchy of centres.

Objective 2 of the proposed Mixed Use Zone describes the character and amenity of the zone as follows:

The built character of Mixed Use areas reflects the diversity of activities that take place in the zone and recognises that these areas are generally in transition spatially between other areas, or in transition over time. Main through routes assist the city's identity and character.

Objective 3 outlines the role of the Mixed Use Zone in accommodating growth as follows:

Mixed Use areas play a significant role in accommodating growth and have sufficient serviced, resilient development capacity to meet commercial and residential growth needs, especially the needs of activities that benefit from a mixed use environment. ...

Overall it is considered that applying the Mixed Use Zone to the site at 41 Percy Cameron Street and the surrounding properties would provide additional flexibility for the use and development of an area that is currently going through a transition from purely commercial and light industrial activities to a mixed use environment with a significant residential component. A Mixed Use Zone would facilitate a range of land uses, including those that could support the surrounding high and medium density residential environment, contributing to a well-functioning urban environment. The Mixed Use Zone would also be better aligned with the residential zone to the south and west.

Conclusion

Urban Edge Planning on behalf of The Wellington Company seek the zoning of the site at 41 Percy Cameron Street and the surrounding properties currently included in the Avalon Business Area as Mixed Use Zone.

The Mixed Use Zone would recognise the current and consented range of activities and provide additional flexibility and allow for the short, medium and long term use and development of the area. It would also be better suited to provide for an appropriate interface with the residential properties to the south and west.



Corinna Tessendorf
Urban Edge Planning Ltd

On behalf of:
The Wellington Company

02 February 2024



Saritha Shetty

From: Shravan Miryala <shravan.miryala@slrconsulting.com>
Sent: Friday, 15 December 2023 1:27 pm
To: District Plan Review Team
Cc: Sarah Westoby
Subject: [EXTERNAL] Z Energy Comments on the City of Lower Hutt Draft District Plan
Attachments: Comments by Z Energy_City of Lower Hutt Draft District Plan.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Good afternoon

Please see attached comments on behalf of Z Energy on the City of Lower Hutt Draft District Plan.

We are happy to meet Council to discuss if they have any questions on the comments we have provided.

Shravan Miryala

Principal Planning Consultant - Planning

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Saritha Shetty

From: Jacqui Hewson <Jacqui.Hewson@rmgroup.co.nz>
Sent: Thursday, 14 December 2023 8:34 am
To: District Plan Review Team
Subject: [EXTERNAL] Feedback on the Draft District Plan Review - on behalf of Winstone Wallboards Limited
Attachments: FEEDBACK ON THE DRAFT_DP_WWB_13_DEC_2023_FINAL.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Kia ora,

Please find attached, feedback on behalf of our client, Winstone Wallboards Limited in regards to the Draft District Plan Review.

We thank you for the opportunity to provide feedback at this early stage and would welcome any future opportunity to assist in preparing any drafting changes that might be agreed upon.

Regards
Jacqui Hewson

Jacqui Hewson
Senior Consultant
[Resource Management Group Ltd](#)

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**FEEDBACK ON THE DRAFT HUTT
CITY DISTRICT PLAN REVIEW
ON BEHALF
OF WINSTONE WALLBOARDS
LIMITED**

TO: District Plan Team
Hutt City Council
Private bag 31-912
Lower Hutt 5040

Feedback lodged by email – district.plan@huttcity.govt.nz

FEEDBACK ON: Draft District Plan Review

FEEDBACK BY: Winstone Wallboards Limited

FEEDBACK ADDRESS: Winstone Wallboard Limited
PO Box 12-256
Penrose
Auckland 1642

Please note the different address for service on page four

INTRODUCTION

1. Winstone Wallboards Limited (**WWB**) hereby provides feedback on the draft City of Lower Hutt District Plan review.
2. **WWB's** feedback focusses primarily on the Heavy Industrial Zone and associated spatial overlays that are relevant to WWB's Lower Hutt distribution centre.

STATEMENT OF INTEREST AND BACKGROUND

3. WWB is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services. WWB has multiple locations throughout New Zealand, including its Lower Hutt distribution centre located at 147 Gracefield Road, Seaview, Lower Hutt.
4. The site is currently occupied by a large warehouse, sealed yard, outdoor storage area, associated car parking and a landscaping strip along the road frontage. Hazardous substances are also used and stored onsite. The site is also classified as a HAIL site on the Greater Wellington Regional Council records.¹ (refer to **Figure 1** below).

¹ Wellington Regional Council Map Viewer – HAIL sites



Figure 1: WWB's Gracefield site, outlined in yellow and indicated by a yellow star. Source: Google Maps, annotated by RMG, December 2023

5. The site has a long site history dating back to 1978, when it was first established.
6. The current site development was granted building consent in 1998 (ABAB980748) with further building consent granted for a minor extension to the rear of the building in 2012. The site building was also recently granted a Building Warrant of Fitness on 13 November 2023.
7. The only resource consent associated with the site was granted in 1998, for earthworks associated with the initial construction of the current building (RM980386).
8. It is WWB's assumption that the current activity operates as a permitted activity under the relevant District and Regional Plans. However, the current site does not hold a Certificate of Compliance to confirm this.
9. Therefore, it is critical that the Draft District Plan provisions continue to provide for WWB's activity as a permitted activity to afford certain for WWB's continued and future viability at this site.

FEEDBACK ON THE DRAFT DISTRICT PLAN PROVISIONS

10. WWB has provided feedback on the Draft District Plan relating to the following matters:
 - i. *Planning Maps - site zoning*
 - ii. *Heavy Industrial zone provisions*
 - iii. *Hazardous substance provisions*
 - iv. *Natural Hazard provisions*
11. Feedback on each of these matters is provided in turn below and **Appendix A** sets out the detailed relief sought.

Planning Maps – site zoning

12. WWB's site is currently located within the Special Business Zone under the Operative District Plan and the Heavy Industrial Zone within the Draft District Plan.
13. **Figures 2 and 3** below illustrate the Operate and Draft Plan Zoning and associated overlays for WWB Gracefield Road site.

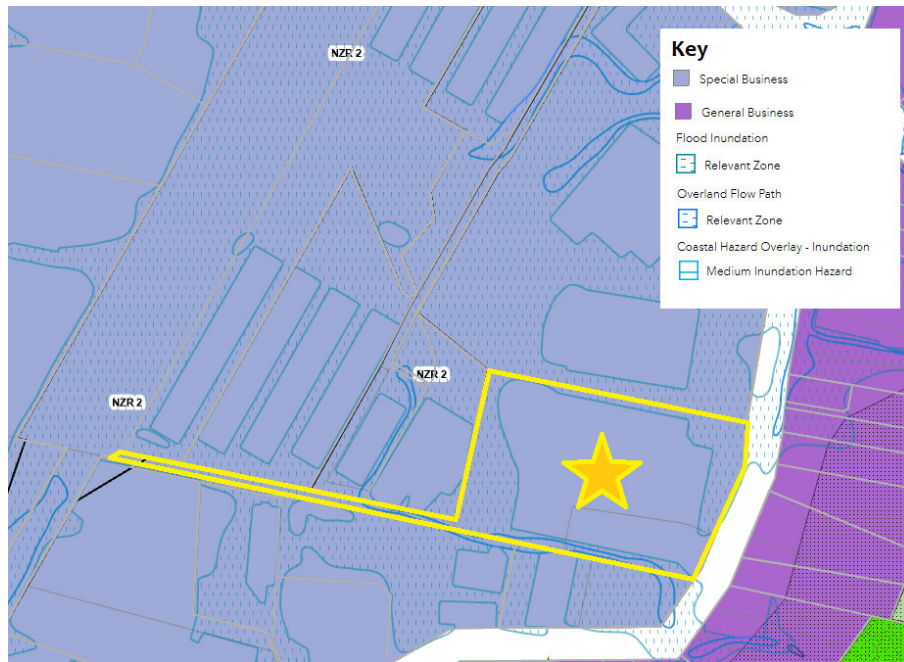


Figure 1: ODP planning map showing WWB's Lower Hutt Distribution Centre outlined in yellow and depicted by a yellow star.
Source: <https://maps.huttcity.govt.nz/portal/apps/webappviewer> annotated by RMG November 2023



Figure 2: DDP planning map showing WWB's Lower Hutt Distribution Centre outlined in blue and depicted by a yellow star.
Source: <https://maps.huttcity.govt.nz/HuttCityMapsViewer> annotated by RMG November 2023

14. WWB generally supports the draft zoning and considers the Heavy Industrial zoning appropriately aligns with the National Planning Standards and provides for the existing activities located within the zone.

Heavy Industrial zone provisions

15. WWB generally supports the draft objectives, policies and standards of the Heavy Industrial Zone, with the inclusion of minor wording changes to Objectives HIZ-01 to explicitly provide for Industrial activities as well as Heavy Industrial Activities.
16. However, WWB opposes the activity status of rule HIZ-R17: Heavy Industrial Activities, being Restricted Discretionary (**RDA**) as the RDA activity status does not align with the zone objective to provide for heavy industrial activities.
17. WWB considers that either:
 - a. a new rule be inserted to provide for a set of standards where a Heavy Industrial Activity would be a permitted activity subject to compliance with those standards (with a default activity to Restricted Discretionary where standards are breached) to ensure consistency between the objectives and policies); or
 - b. Redraft Rule HIZ-R17 to provide for Heavy Industrial Activities as a controlled activity where control is limited to the matters currently drafted for HIZ-R17 matters of discretion.
18. Refer to **Appendix A** for detailed relief sought.

Hazardous substance provisions

19. As currently drafted, Rules HS-R1 and R2 for the expansion and upgrading of existing and new 'Significant Hazardous Facilities' are both Restricted Discretionary Activities in all zones.
20. The definition of a 'Significant Hazardous Facility' is also included in the definition of the a 'Heavy Industrial Activity'.
21. To ensure that there is alignment with the zone purpose objective for the Heavy Industrial Zone, and objective HS-P2 that seeks to 'enable significant hazardous facilities in the Heavy Industrial Zone, WWB considers that there should be a level, such as hazardous substance volume limits or scale of activity (in terms of floor area for example) that is permitted or has controlled activities status with respect to 'Significant Hazardous Facilities' within the Heavy Industrial Zone. As proposed in the DDP, there is a misalignment between the policy and the activity status for 'Significant Hazardous Facilities'.
22. Therefore, WWB considers that further refinement/redrafting of the hazardous substance provisions, particularly in respect to the Industrial and Heavy Industrial zones is needed to ensure that the intent of these zones and policies are appropriately reflected in activity status of the rules.

Natural Hazard provisions

23. Industrial activities are captured by the definition of "Potentially hazard sensitive activities" under the Draft Plan. WWB considers that the definition should be clear that the activities listed in the definition are only considered where the activity is intersected by a relevant natural hazard overlay.

24. Specifically, Rules NH-R10 and NH-R11, treat “potentially hazard sensitive activities’ as discretionary and non-complying activities where additions to existing buildings are within the overland flow path or steam corridor flood hazard overlays.
25. However, Policies NH-P8 and P9, which seek to provide for such activities where they can demonstrate mitigation. That policy direction would suggest that a more enabling rule framework is appropriate.
26. Therefore, WWB considers the activity status for industrial activities does not align with the intent of Policies NH-P8 and P9 and the rule should be redrafted to ensure alignment. Refer to **Appendix A** for detailed relief sought.

CONCLUSION

27. WWB wishes to thank Hutt City Council and the District Plan Team for the opportunity to provide feedback and seeks to be directly involved in any future draft iterations of the plan or when the District Plan is formally proposed.
28. WWB would welcome the opportunity to discuss the content of this submission first-hand with Plan’s authors. In particular WWB would be prepared to assist in any drafting changes that might be agreed upon.

Feedback signed for and on behalf of Winstone Wallboards Limited



Jacqui Hewson
Senior Consultant Planner

022 6801921

Email: Jacqui.hewson@rmgroup.co.nz

Resource Management Group Limited

13 December 2023

Address for Service:

Winstone Wallboards Limited
C/- Resource Management Group Ltd
PO Box 25 175
WELLINGTON 6140

APPENDIX A

Detailed Feedback Relief on the Draft District Plan Review

Feedback Name: **Winstone Wallboards Ltd**

Relevant Chapter/section of the Draft Plan	Specific provision / matter	Position	Reason for feedback	Relief sought
Draft Zoning Maps	Heavy Industrial zoning of 147 Gracefield Road, Seaview, Lower Hutt	Support	Although WWB considers the definition contained in the Draft District Plan for distribution centre would be considered a 'Industrial Activity' rather than a 'Heavy Industrial Activity', WWB considers the draft Heavy Industrial zoning is appropriate for it Gracefield site given the surrounding uses and the overall intent to protect the existing activities from reverse sensitivity matters and to manage any adverse effects. Furthermore, the Heavy Industrial Zoning provides flexibility for further redevelopment of the site should that ever be contemplated.	Maintain the Heavy Industrial Zone as shown on the draft planning maps.
Part 3: Heavy Industrial Zone Provisions	Objective HIZ-01: Purpose of the Zone	Support with modifications	WWB considers that the single objective for the purpose of the zone provides for greater direction and protection for industrial activities particularly regarding reverse sensitivity. However, the Objective HIZ-01 should be explicit in that it provides for both industrial and heavy industrial activities and that the word 'industrial' needs a hyperlink to the definition.	<i>Amend Objective HIZ-01 as follows:</i> <i>"The Heavy Industrial area is used primarily to meet the needs of <u>industrial</u> and research activities and supporting activities and is recognised for its regionally significant role in providing for <u>both industrial activities and</u> heavy industry. It may be suitable for some compatible land uses that do not belong in any other zone"</i>
Part 3: Heavy Industrial Zone Provisions	Policies HIZ-P1-P12	Support	WWB consider that the DDP policies provide for greater clarity in terms of how effects are managed, particularly in relation to reverse sensitivity. However, and as covered below WWB consider there is some inappropriate misalignment between these enabling policies and the entry and default activity status for heavy industrial activities.	Retain Policies HIZ-P1-P12 as drafted.
Part 3: Heavy Industrial Zone Provisions	Rule HIZ-R17: Heavy industrial activities	Oppose	As drafted, Rule HIZ-R17 provides for Heavy Industrial Activities as a Restricted Discretionary as an entry level activity status. WWB considers that the Restricted Discretionary Activity status does not provide the certainty for heavy industrial activities, and does not align with the zone purpose objective, which is to provide the needs of industrial uses, but more specifically heavy industrial activities. Given the intent of the zone, WWB considers the activity status for Heavy Industrial Activities should either be 'permitted' or 'controlled' as an entry level activity status to provide for certainty for such activities and ensures alignment between the objective intent and activity status.	That either: a. a new rule be inserted to provide for a set of standards where a Heavy Industrial Activity would be a permitted activity subject to compliance with those standards (with a default activity to Restricted Discretionary where standards are breached) to ensure consistency between the objectives and policies.); or b. Redraft Rule HIZ-R17 to provide for Heavy Industrial Activities as a controlled activity where control is limited to the following matters: i. <u>Amenity values</u> outside the Industrial Zones, ii. Health and safety beyond the <u>site</u> , iii. The management of <u>dust</u> and odour.
Part 3: Heavy Industrial Zone Provisions	Standards HIZ-S1-S8	Support	WWB considers the standards provide for adequate to ensure permitted activity status can be achieved.	Retain as drafted.
Part 2: District Wide, Hazards and Risk	Hazardous substances	Oppose	As currently drafted, Rules HS-R1 and R2 for Expansion and upgrading of existing and new 'Significant Hazardous Facilities' are both Restricted Discretionary Activities in all zones. However, objective HS-P2 that seeks to 'enable significant hazardous facilities in the Heavy Industrial Zone. The policy wording would indicate a more permissive activity status.	Seeks that the hazardous substance rules for the Industrial and Heavy Industrial Zone should be refined/redrafted to provide for an appropriate level of permitted or controlled activities with respect to 'Significant Hazardous Facilities'.

Relevant Chapter/section of the Draft Plan	Specific provision / matter	Position	Reason for feedback	Relief sought
			<p>Both the Industrial and Heavy Industrial Zones, are by zone intent most likely to be occupy 'significant hazardous facilities', which are defined in the Draft Plan as:</p> <ol style="list-style-type: none"> 1. Manufacturing of hazardous substances (including industries manufacturing agrochemicals, fertilisers, acids/alkalis or paints) 2. Oil and gas exploration and extraction facilities 3. The storage/use of more than 100,000 litres of petrol 4. The storage/use of more than 50,000 litres of diesel 5. The storage/use of more than 6 tonnes of LPG 6. Galvanising plants 7. Electroplating and metal treatment facilities 8. Tanneries 9. Timber treatment 10. Freezing works and rendering plants 11. Wastewater treatment plants 12. Metal smelting and refining (including battery refining or recycling) 13. Milk treatment plants 14. Fibreglass manufacturing 15. Polymer foam manufacturing 16. Asphalt/bitumen manufacture or storage <p>To ensure alignment between the both the HIZ zone policy and hazardous substance policies, WWB considers that there should be a level, such hazardous substance volume limits or scale of activity (in terms of floor area for example) that is permitted or controlled activities status with respect to 'Significant Hazardous Facilities' within the Heavy Industrial Zone.</p>	
Part 2: District Wide, Hazards and Risk	Natural Hazards	Oppose	<p>Industrial activities are captured by the definition of "Potentially hazard sensitive activities" under the Draft Plan.</p> <p>Rules NH-R10 and NH-R11, which relate to "potentially hazard sensitive activities" are discretionary and non-complying activities where additions to existing buildings are within the overland flow path or steam corridor flood hazard overlays.</p> <p>However, WWB considers the activity status does not align with Policies NH-P8 and P9, which seek to provide for such activities where they can demonstrate mitigation.</p> <p>WWB also considers that the definition of "potentially hazard sensitive activities" should be clear that the activities listed in the definition are only considered as such, where the activity is intersected by the a relevant natural hazard overlay.</p>	<p>WWB considers that Rules NH R10 and NH-R11 should be redrafted to provide for "potentially hazard sensitive activities" as a restricted discretionary, where the matters of discretion are restricted to the relevant matters of Policy NH-P8, to align with Rule NH-R9.</p> <p>If the activity does not comply with the matters of discretion, then the activity status should be discretionary, rather than non-complying to ensure consistency with the policies.</p> <p>Amend the definition of "potentially hazard sensitive activities" to explicitly state that the listed activities are only "potentially hazard sensitive activities" where the activity is intersected by a relevant natural hazard overlay.</p>

Saritha Shetty

From: Philip Heffernan (Winstone Aggregates) <Philip.Heffernan@winstoneaggregates.co.nz>
Sent: Friday, 15 December 2023 4:53 pm
To: District Plan Review Team; Sean Bellamy
Cc: Ian Wallace (Winstone Aggregates)
Subject: [EXTERNAL] Submission to the Hutt City Plan Draft Review - Winstone Aggregates
Attachments: Hutt City Plan Draft - Winstone's submission - Final_15_12_2023.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Tēnā koutou katoa

I am writing to submit Winstone Aggregates' official response to the Hutt City Plan Draft Review. Enclosed is our submission document, which outlines our perspective and recommendations regarding the draft plan. This submission is the culmination of extensive internal review and expert consultations, reflecting our commitment to sustainable quarry operations and community welfare.

In our submission, we have addressed several key areas that we believe are critical for the continued success and balance of environmental, community, and operational interests in the Hutt and wider Wellington region. We have focused on areas such as Quarry Zone management, vegetation in quarry zones, Special Amenity Areas, and noise and vibration standards, among others.

We appreciate the opportunity to provide our input and look forward to engaging in constructive discussions. We believe that through collaborative efforts with the Council and other stakeholders, we can achieve a plan that is beneficial for all parties involved.

Please do not hesitate to contact me if you require any further information or clarification regarding our submission.

Ngā mihi nui for considering our perspectives in this important review process.

Phil

Phil Heffernan

Project Manager

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Sean Bellamy
Policy Planner
Hutt City Council
30 Laings Road
Lower Hutt 5040
district.plan@huttcity.govt.nz

15 December 2023

HUTT CITY PLAN REVIEW – WINSTONES SUBMISSION

Introduction

Winstone Aggregates, a proud division of Fletcher Concrete and Infrastructure, boasts a rich heritage spanning over a century in New Zealand's aggregates industry. As the nation's premier manufacturer and distributor of aggregates, our presence is notably strong in the Wellington region, especially within Hutt City. Our operations, including the strategically vital Belmont, Petone, and Dry Creek quarries play a critical role in the development of the region's infrastructure. Belmont Quarry has supported growth of the Hutt City district since the 1920's and Winstone's has been a proud part of that since 1988. Belmont produces approximately 30% of all aggregate for Wellington, and 50% of the high grade aggregate.

Our approach to quarrying is not just about extraction; it embodies a deep commitment to sustainable practices, environmental stewardship, and meaningful community engagement. The quarries we operate in Hutt City are vital cogs in the local economy, providing essential materials for various infrastructure and construction projects, while maintaining a minimal environmental footprint.

In the context of the Wellington region, where the demand for aggregates is spurred by both population growth and significant infrastructure projects like the Wellington Northern Corridor, Melling Link project, and Transmission Gully, Winstone Aggregates stands as a key contributor. Our proximity to these projects, combined with our extensive expertise in aggregate production, enables us to supply high-quality materials in an efficient manner, thereby reducing transportation costs and minimizing our environmental impact.

Draft Hutt City District Plan Review

Winstone Aggregates has reviewed the recently released draft of the Hutt City District Plan. We recognize and appreciate the regulatory role of Hutt City Council and the unique position that our operations, particularly the Belmont Quarry, hold within the Hutt community. Our support for the Council's process and approach in the Plan review is unwavering, and we look forward to engaging constructively with the Council throughout this process.

As a market leader, Winstone Aggregates is not only known for our operational scale but also for our high environmental standards that we set and adhere to across our sites. This leadership extends to our proactive approach in collaborating with Hutt City Council, ensuring that our operations align with the sustainable development goals of the region.

Commitment and Collaboration

Winstone Aggregates is resolutely committed to the development of the Wellington region, while concurrently upholding our core values of environmental and community care. Our operations are instrumental in providing the materials necessary for the region's infrastructure and housing, significantly contributing to the local economy. This submission is an expression of our dedication to collaborate with Hutt City Council in achieving these shared goals. The Draft Plan makes changes to the existing Quarry Management Area, which has been in the district plan for over 20 years. Winstone welcome the introduction of a new Special Purpose Precinct for the Quarry and see this as a timely opportunity to ensure the provisions are up to date with best practice and better align with its

operations.

Winstone's feedback on the notified draft plan is discussed in detail below. Winstone seek to work collaboratively with Officers during the development phase of the plan to ensure that the new Special Purpose Precinct for Belmont Quarry result in the formulation of clear and workable provisions.

Winstone intend to support the District Plan preparation, by undertaking additional technical reports that will offer in-depth insights based on the submission points we have raised, in order to give Council a better understanding of our Belmont operations and requirements of the Special Purpose Zone, thereby assisting in the formulation of a well-rounded and effective District Plan.

Submission Points

1. Quarry zone

1.1. QZ — Quarry Zone

Submission: Support for the general structure and content of the Quarry Zone, which retains function and intent of the operative provisions, but better aligns with the NPS Planning Standards and definitions. Winstone also support the Quarry Protection Area provisions to future proof the quarry and manage reverse sensitivity effects.

Rationale: The existing framework of the Quarry Zone has proven to be effective in balancing operational efficiency with environmental and community concerns. Our operations have consistently complied with the rules, demonstrating a track record of compliance and practicality. Continued support of this structure is crucial for meeting the region's aggregate demands while maintaining sustainable practices.

1.2. QUARZ-P4 – Vegetation in Quarry Zones

Submission: Request to remove the provision regarding the “retention of existing vegetation and planting of indigenous vegetation” in QUARZ-P4. Winstone Aggregates seeks clarity and potential modification of this provision, as vegetation stripping is an inherent part of quarrying operations.

Rationale: Retaining vegetation in active quarry zones is not feasible due to the nature of quarrying activities. We propose working with Hutt City Council to develop practical guidelines that balance operational needs with environmental considerations.

1.3. QUARZ-S6 (Special Amenity Areas)

Submission: Removal of part of the Special Amenity Area (SAA) overlay from a specific part of the quarry site.

Rationale: This change, backed by comprehensive landscape and acoustic analyses, is critical for accessing additional resources to support regional development will provide a further 20 years of resource. This will lengthen the life of Belmont Quarry, and therefore creating a secure, central, supply for Wellington. Winstone has sought advice from landscape architect DCM Urban, the Visual Amenity Assessment has shown that the proposed removal will have minor visual impact from various key viewpoints, maintaining the scenic and amenity values of the area.

1.4. QUARZ-S5 (Indigenous Vegetation Buffer Strip)

Submission: Proposal to remove the 25-meter buffer with Belmont Regional Park.

Rationale: The majority of this buffer area is protected under the QEII covenant, which already provides substantial environmental safeguards. Removing this buffer will allow greater operational flexibility for quarry activities, enhancing resource accessibility without compromising the ecological integrity of the park. Winstone's would be happy to work with Hutt City to update the planning map.

2. TR — Transport

2.1. Table 8: High trip generating activity thresholds

Submission: Inclusion of "Quarry activities" in Table 8 under "Quarry Zone" with "No threshold" for vehicle movements.

Rationale: Quarry operations have distinct traffic patterns that differ significantly from other high trip generating activities. Recognising these unique patterns will enable more efficient management of quarry-related traffic, ensuring safety and minimising potential disruptions to the local transport network. This retains the current approach and understanding of the operational realities of quarrying while maintaining public safety and transport efficiency.

3. Natural Hazards

3.1. Overland flowpath and inundation area

Submission: Exclude quarry zoning from overland flowpath and inundation area. Winstone Aggregates would like to collaborate with Hutt City Council to reassess the identified inundation area risks on Quarry zones. Our objective is to refine the stormwater, flooding, and other hazard assessments on the site to ensure they accurately reflect current and future conditions.

Rationale: Quarries, by their very nature, undergo constant changes in ground form. This dynamic nature makes any fixed point-in-time assessment of flooding risks and hazards challenging. For Quarry zones, a more nuanced bespoke and ongoing approach is required to accurately define and manage these risks. Our expertise in quarry operations, combined with the Council's insights, can lead to a more accurate and practical understanding of the site's hazard profile. These rules are predominately aimed at buildings and structures (RDA rule) and cannot be easily applied to quarrying activities.

4. Noise

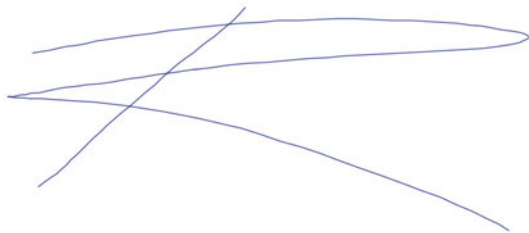
4.1. Noise chapter all sections and Quarry Zone QUARZ-S2, S8 APPXX — Vibration Standards associated with blasting in the Quarry Zone

Submission: Winstone Aggregates is currently reviewing advice received from Styles Group regarding the noise and vibration standards outlined in the Noise chapter and specific sections of the Quarry Zone (QUARZ-S2, S8, APPXX) in the Draft District Plan. We plan to share our comprehensive findings and recommendations with Hutt City Council once we have fully assessed the operational impacts of this advice in conjunction with the Draft Plan's provisions.

Rationale: The objective of this review is to ensure that the proposed noise and vibration standards in the Draft District Plan align with best practices and do not unduly restrict quarry operations while safeguarding the surrounding community from adverse effects. The thorough assessment by Styles Group will provide valuable insights into the practicality and implications of these standards for quarry activities, enabling informed and balanced decisions.

We are eager to engage in a productive partnership with Hutt City Council. Our goal is to achieve an optimal balance that respects the environmental needs, community interests, and operational requirements associated with this vital economic resource for Hutt and the broader Wellington region. We believe that through mutual understanding and cooperation, we can ensure a sustainable future for all stakeholders involved

Regards



Phil Heffernan

Project Manager

w: winstoneaggregates.co.nz



Appendix A: Visual Amenity Assessment Memo by DCM



Thursday 14 December 2023

WINSTONE AGGREGATES LIMITED

Belmont Quarry
LOWER HUTT 5010
Email: Philip.Heffernan@winstoneaggregates.co.nz

Ref: 2023_076_Winstone Belmont Quarry_Visual Amenity Assessment Memo_A

Attachment: 2023_076 Winstones Belmont Quarry LVIA Memo Submission_A

BELMONT QUARRY DISTRICT PLAN SUBMISSION

VISUAL AMENITY ASSESSMENT - MEMO

Dear Phil,

The following memo is our initial assessment of the visual amenity effects from removal of the Special Amenity Area (SAA) within the existing quarry and the removal of the 25m vegetated buffer strip around the edge of the quarry bordering the Regional Park. Our methodology is based on the principles and guidance provided by Te Tangi a Te Manu - Aotearoa New Zealand Landscape Assessment Guides (July 2022), NZILA. This memo should be read in conjunction with the attached figures.

VISUAL RECEIVING ENVIRONMENT

The visual context of the receiving environment plays a pivotal role in evaluating the potential effects on visually sensitive receptors. The assessment focuses on key viewpoints, such as those of local residents and passersby, providing a comprehensive understanding of the likely impacts. A detailed table outlines potential visual effects on various Visually Sensitive Receptors (VSR), considering factors like distance, type of view, magnitude of change, and proposed mitigation measures. The proposed excavation extension at Belmont Quarry is systematically analysed from multiple perspectives, with a keen focus on preserving the existing visual amenity. The overall effects on visual amenity are deemed minor, considering the scale and location of the existing quarry and the proposed extension. Mitigation measures are strategically proposed to address any perceived residual visual effects, emphasising a commitment to maintaining the visual context and integration of Belmont Quarry and its surrounding environment.

VP1 – View from Hutt River Walking Trail, looking north towards the site

VP2 – View from 1226 Taita Drive, looking northwest towards the site

VP3 – View from Rimutaka Cycle Trail, looking northwest towards the site

VP4 – View from Taita Rock River Trail, looking west towards the site

VP5 – View from 17 Whitechapel Grove, looking southwest towards the site

VP6 – View from Hutt River Trail/ Eastern Hutt Road, looking southwest towards the site

In assessing the potential effects on visually sensitive receptors, the key viewpoints outlined above have been used as a reference point where it is considered that the effects will be similar to the viewpoint of local residents and visitors passing by.

VISUAL AMENITY ASSESSMENT

The following table outlines the potential visual effects each Visually Sensitive Receptor might receive and how the effects may potentially be mitigated. The effects take into account the likely sensitivity of the receptor (based on type), combined with the likely magnitude of effects (a combination of distance from the proposal and degree of change) to determine what the likely residual effects from the proposal will be.

Table 1: Assessment of Effects on Visually Sensitive Receptors

Viewpoint	Visually Sensitive Receptors (VSR)	Distance from Proposal (m)	Type of View (open, partial, screened)	Magnitude of Change
1	Track users travelling north along Hutt River.	0-100	PARTIAL/ SCREENED	Low
2	Residents and vehicle users travelling both directions along Taita Drive	250-300	PARTIAL/ SCREENED	Minor
3	Cycle track users travelling both directions	180-320	PARTIAL/ SCREENED	Minor
4	Track users travelling southwest from Taita Rock River Trail	350	PARTIAL/ SCREENED	Minor
5	Residents and vehicle users along Whitechapel Grove	1200	SCREENED	Negligible
6	Road and trail users travelling southwest along Hutt River Trail and Eastern Hutt Road	1500-1750	SCREENED	Negligible

1. VP1 – View from Hutt River Walking Trail, looking North towards the site

Description of existing view – Views of the quarry is partially screened, revealing only views of the quarry's upper elevation above the treeline. The view consists of open green spaces surrounded by dense vegetation with open views of the gravel track and Hutt River. There are also partial views of the passing vehicles along Western Hutt Road and the Quarry facility's building, partially screened by vegetation.

Description of Effects – Those travelling along the Hutt River Walking Trail will experience a partial view of the overall quarry, including the proposed excavation extension. The proposal will modify the existing vegetated hills to a cleared stepped topography. It will predominantly impact the visibility of the upper elevations of the quarry from the trail, with the lower half of the quarry remains screened by the existing vegetation along the trail. The proposal is an extension of the existing visible quarry so the proposal will not be out of context and the overall magnitude of change is considered to be **low**.

2. VP2 - View from 1226 Taita Drive, looking Northwest towards the site

Description of existing view – The northwestern view from 1226 Taita Drive showcase expansive green space leading up to an open view of Belmont Quarry. The view of the landscape features hills showcasing both vegetated and cleared areas within the quarry premises. Due to the excavation operation being conducted perpendicular to the roads and residential properties, rather than parallel or along the edge of the hills, only the frontal operations of the quarry are visible. There are also unobstructed views of the buildings and the frontal section of the quarry, situated within its premises.

Description of Effects – Residents will experience open views of the planned excavation extension, revealing a cleared stepped topography, predominantly at the upper elevations of the quarry. The lower elevations will maintain existing vegetation, providing a natural screening for the residential properties along Taita Drive. The proposed excavation, when observed from the front of the quarry (northwest from 1226 Taita Drive), is discontinuous from the existing quarry, allowing for the preservation of vegetation. This mitigated visual impact, rendering the cleared land less pronounced and softening the overall appearance. The proposal will not be out of context due to the visibility and extent of the existing quarry so the overall magnitude of change is considered to be **minor**.

3. VP3 - View from The Rimutaka Cycle Trail, looking Northwest towards the site

Description of existing view – The northwestern views from the Rimutaka Cycle Trail prominently showcase expansive open spaces, with a continuous row of pre-mature trees and substantial shrubs lining one bank of the Hutt River. The vegetation on the opposing side appears more scattered and discontinuous. The background is dominated by hills with an expanse of vegetation that stops at the quarry where there are visible large, excavated steep areas and supporting industrial building facilities at the lower elevations. The lower sections of the quarry predominantly feature screening, transitioning to open views of the upper quarry sections. The remaining part of the quarry, extending into the hills, is visually obstructed by the foreground hills.

Description of Effects – When travelling along the Rimutaka Cycle trail, the visibility of the proposed site is partially obstructed by the retention of the vegetated front hills. It provides a degree of enclosure and screening for the proposed front excavation from the cycle trail users. Although the trail is a short distance (approximately 300m away from VP3), the obstructive elements' angle and scale hinder expansive, unobstructed views over both extended periods and distances. The view of the proposal will closely resemble the current perspective of the quarry front, revealing only a portion of the overall quarry. It is considered that users will experience **minor** change when travelling along the Rimutaka Cycle Trail.

4. VP4 - View from Taita Rock River Trail, looking West towards the site

Description of existing view – View west from Taita Rock River Trail is open green spaces with sparse areas of vegetations and mixed indigenous scrubland on the rolling hills. The open expanse features predominantly level terrain, gently sloping towards the river, while on the opposite bank, native vegetation aligns the riverbank. The view also includes the beginning of the trail and associated infrastructure (carpark, signage, fencing). A small portion of the existing quarry front can be seen. A limited section of the current quarry and a building excavation front is visible, primarily screened by the surrounding vegetation and the slope of the hills.

Description of Effects – When travelling west along the Taita Rock River Trail, views to the proposed excavation extension will be partially screened. The visibility of both the existing quarry and the proposed extension are predominantly screened, primarily attributed to the substantial retention of vegetation and the imposing scale of the sloping hills that enclose the majority of the quarry. There are open views of the upper elevations of the proposal, above the tree line with no obstructions, are anticipated while the lower areas of the proposed excavations will be fully screened. The view of the proposal will closely resemble the current perspective of the quarry front, revealing only a portion of the overall quarry. It is considered that users will experience **minor** change when travelling along the Taita Rock River Trail.

5. VP5 - View from 17 Whitechapel Grove, looking Southwest towards the site

Description of existing view – The southwestern view from residential properties along Whitechapel Grove is completely obstructed by an abundance of vegetation, preventing a direct line of sight to the quarry excavations. Dense vegetation lines the side of the street closest to the quarry. The view features a residential cul-de-sac street and residential properties, characterized by a vegetated property edge that effectively screens residents from the street.

Description of Effects – Residents along Whitechapel Grove, positioned facing the quarry, will be devoid of any view of the proposed excavation. This absence of visibility is attributed to the natural screening present along the street edge and within the residential property boundaries. It is considered that users will experience less than low change and visual effects.

6. VP6 - View from Hutt River Trail/ Eastern Hutt Road, looking Southwest towards the site

Description of existing view – The southwestern perspective from the Hutt River Trail/Eastern Hutt Road in this area is entirely obstructed by a continuous stretch of vegetation, ranging from medium shrubs to tall trees. There are open spaces on the lower slopes leading towards the river. The view also includes the beginning of the trail tracks and the road, featuring associated infrastructure such as streetlights and signage.

Description of Effects – Travelers along this stretch of the Hutt River Trail will encounter a complete absence of views regarding both the existing quarry and the proposed excavation extension. This lack of visibility is attributed to the combined factors of distance, angle, and obstructive vegetation in between. It is considered that users will experience an indiscernible change to existing views.

SUMMARY OF EFFECTS ON VISUAL AMENITY

Given the scale and location of the existing quarry and the proposal, there will be limited views of the excavations, and levels of potential adverse effects on visual amenity are overall considered to be minor.

Effects on vehicle / road and trail users – The effects of the proposed excavation extension on the visual landscape vary across different viewpoints. From the Hutt River Walking Trail, there will be a partial modification of the existing view, with the upper elevations of the quarry becoming more visible, while the lower half remains concealed by vegetation. Along 1226 Taita Drive, residents will experience open views of the planned excavation, yet the discontinuity with the existing quarry softens the overall appearance. On the Rimutaka Cycle Trail, the proposed site is partially obstructed by vegetated front hills, providing a degree of enclosure and screening for trail users. The Taita Rock River Trail presents partially screened views of both the existing quarry and the proposed extension due to substantial vegetation retention and the slope of enclosing hills. Residents along Whitechapel Grove are shielded from any direct view of the proposed excavation by dense vegetation. The perspective from the Hutt River Trail/Eastern Hutt Road is entirely obstructed by continuous vegetation. Given the visibility of the existing quarry and how the proposed excavation will be mostly continuous with the existing quarry as part of a productive landscape, the proposal is not considered to have any significant adverse effects on the existing visual amenity of the surrounding environment of Belmont Quarry and Lower Hutt. Mitigation measures are proposed to address any perceived residual visual effects, acknowledging the diverse viewpoints and experiences of road users in the affected areas.

Effects on nearby residents – The effects of the proposed excavation extension at the quarry site on nearby residents vary depending on their specific locations. For residents along 1226 Taita Drive, the extension will result in open views of the planned excavation, softened by the discontinuity from the existing quarry and the preservation of existing vegetation. Those situated along Whitechapel Grove, facing the quarry, will be devoid of any view of the proposed excavation due to the natural screening present along the street edge and within residential property boundaries. Residents along this street will experience less than low change and visual effects. Overall, the proposed changes are anticipated to have minor to negligible visual effects on the specific views experienced by residents in these locations. Mitigation measures are proposed to address any perceived residual visual effects, acknowledging the diverse viewpoints and experiences of residents in the affected areas.

Effects of removal of the 25 vegetated buffer strip from Quarry Boundary with Belmont Regional Park

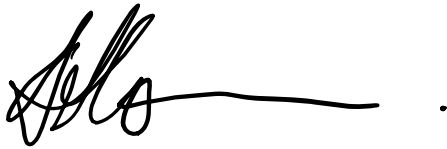
In terms of Winstone's request to remove the 25m vegetated Buffer Strip from the Quarry Boundary with the Belmont Regional Park the topography of the quarries boundary with the regional park side is steep and vegetated bush, this area is relatively inaccessible and removal of the buffer will have a low visual impact from any accessible locations. It is important to note that the vegetation in this area serves little purpose in terms of an amenity buffer. Two areas within the 25m vegetated buffer have been previously assessed in this area and vegetation of significance and form part of two larger areas that are subject to QEII covenants and have protection perpetuity, removal of the buffer notion in those areas will not have any impact as they will retain protection via covenants. There are some parts of the buffer strip that are between the covenants, and not subject to the covenants where some vegetation within the current buffer area may be removed in future to better provide for quarry operation but I have assessed this change to have little to no discernible impact due to the topography and distance of viewers outside of the quarry.

CONCLUSION

Please note these are our initial findings and we are in the process of working through suggested mitigation measures with the Acoustic expert. However, based on the finding above, I consider that the removal of the SAA and the 25m vegetated buffer on the Regional Park boundaries will have Minor effects at most on the visual amenity experienced by nearby sensitive receptors.

Please do not hesitate to contact me if you require any clarification.

Yours sincerely

A handwritten signature in black ink, consisting of stylized initials followed by a long horizontal line and a period.

Dave Compton-Moen

DIRECTOR, REGISTER LANDSCAPE ARCHITECT, URBAN DESIGNER

MUD (Hons), NZILA(reg.), MNZIP



APPENDIX TWO - LANDSCAPE AND VISUAL IMPACT ASSESSMENT - MEMO SUBMISSION

BELMONT QUARRY
WINSTONES AGGREGATES LIMITED

14 DECEMBER 2023
PROJECT NO. 2023_076
REVISION A



BELMONT QUARRY - LVIA MEMO SUBMISSION

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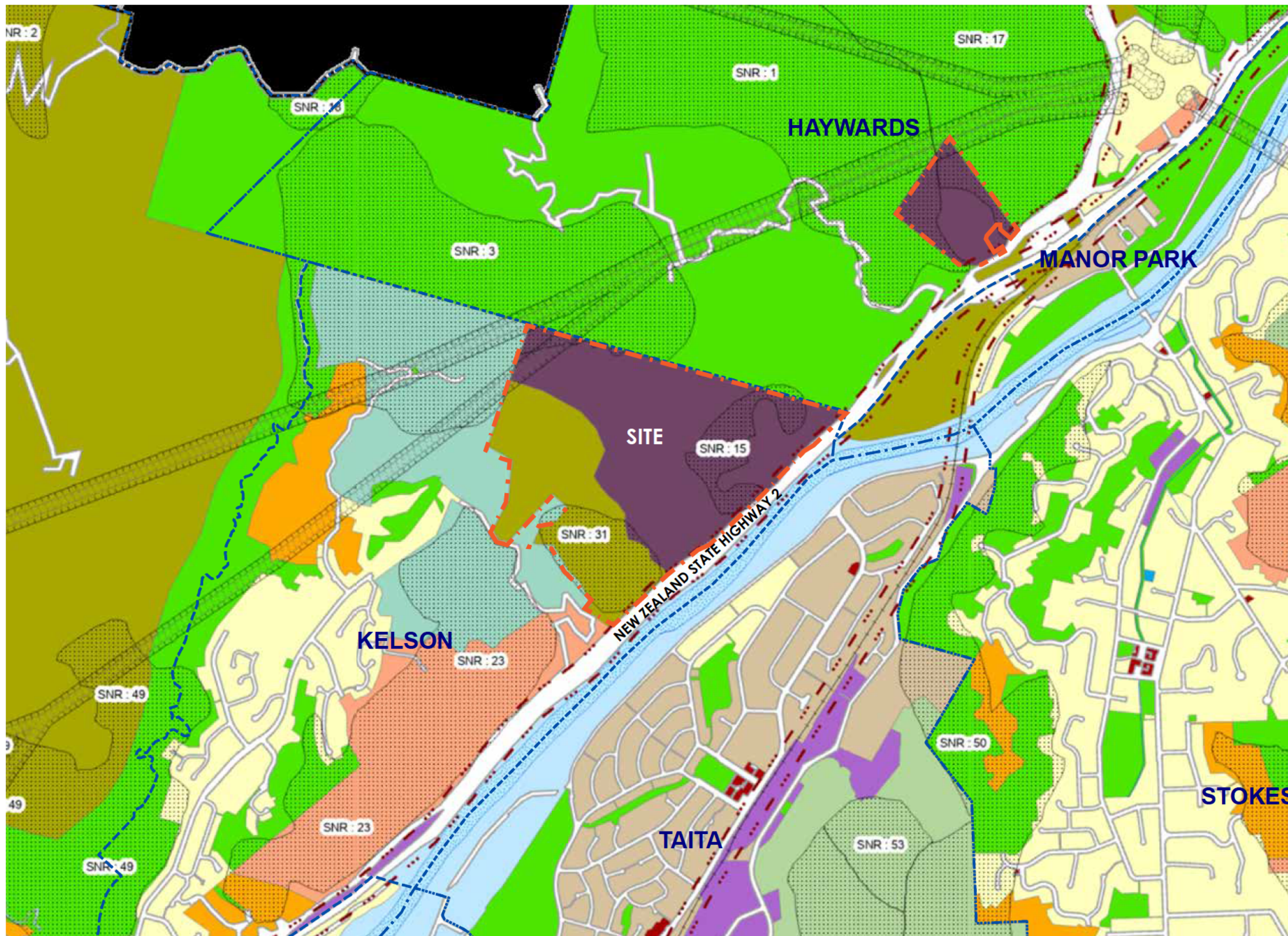
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- LEGEND**
- - - Site Boundary
 - Suburban Mixed Use
 - Landscape Protection
 - Hill Residential
 - Medium Density Residential
 - General Rural
 - General Recreation
 - Passive Recreation
 - Rural Residential
 - River Recreation
 - General Business
 - Quarry Land
 - High Density Residential
 - Road Corridors

A. HUTT CITY DISTRICT PLANNING MAP (NTS)

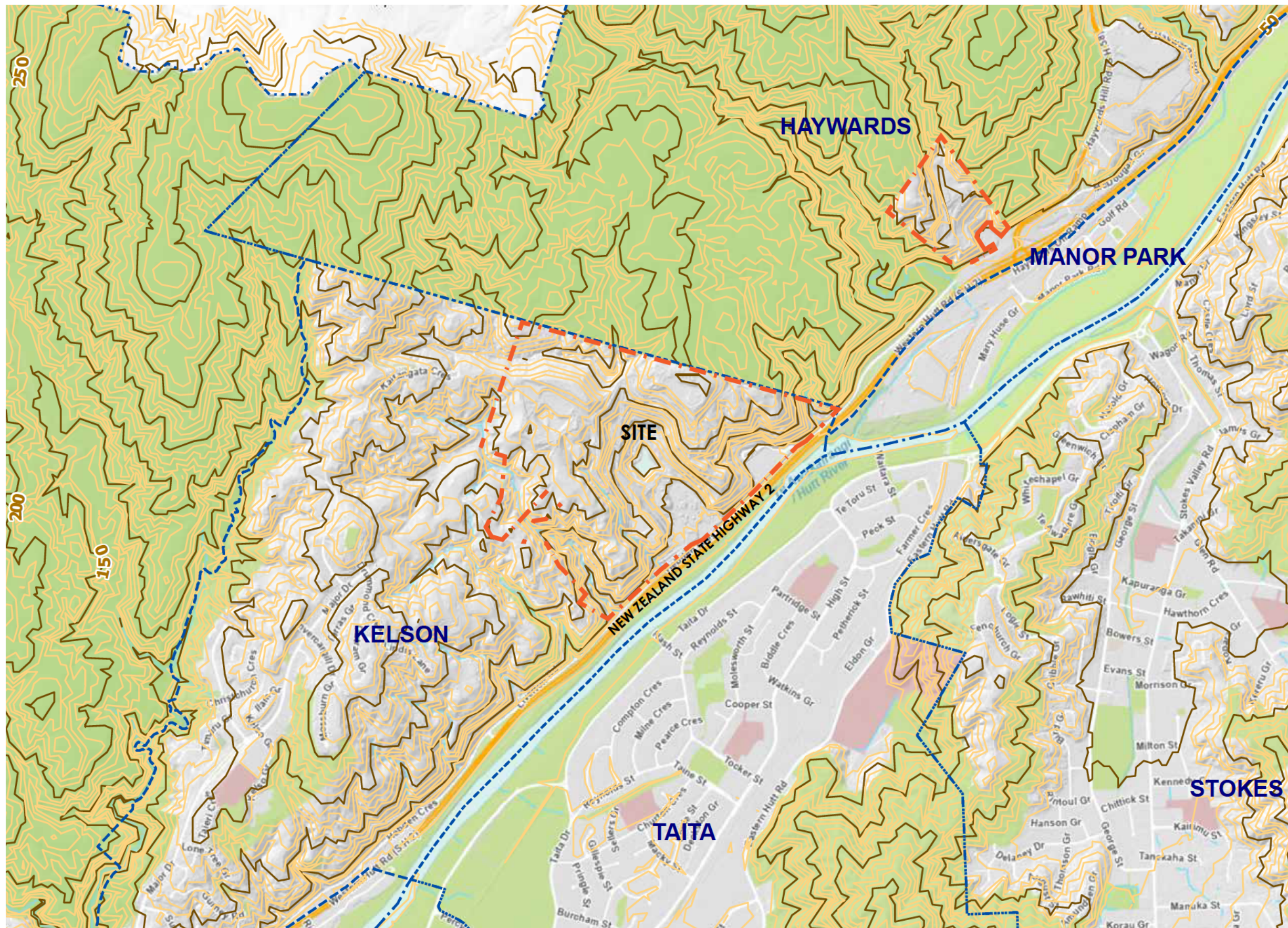
Map / image source: Hutt City Council GIS

APPENDIX 2 - LANDSCAPE AND VISUAL IMPACT ASSESSMENT - MEMO SUBMISSION

CONTEXT - HUTT CITY OPERATIVE DISTRICT PLANNING MAP

2023_076_WINSTONES AGGREGATES LIMITED_BELMONT QUARRY





LEGEND

Site Boundary

A. HUTT CITY CONTOUR MAP (NTS)

Map / image source: Hutt City Council GIS

APPENDIX 2 - LANDSCAPE AND VISUAL IMPACT ASSESSMENT - MEMO SUBMISSION

CONTEXT - HUTT CITY CONTOUR MAP

2023_076_WINSTONES AGGREGATES LIMITED_BELMONT QUARRY





A. EXISTING VIEW

Image source: Google Earth 2023

APPENDIX 2 - LANDSCAPE AND VISUAL IMPACT ASSESSMENT - MEMO SUBMISSION

PROPOSAL - ELEVATED PERSPECTIVE A

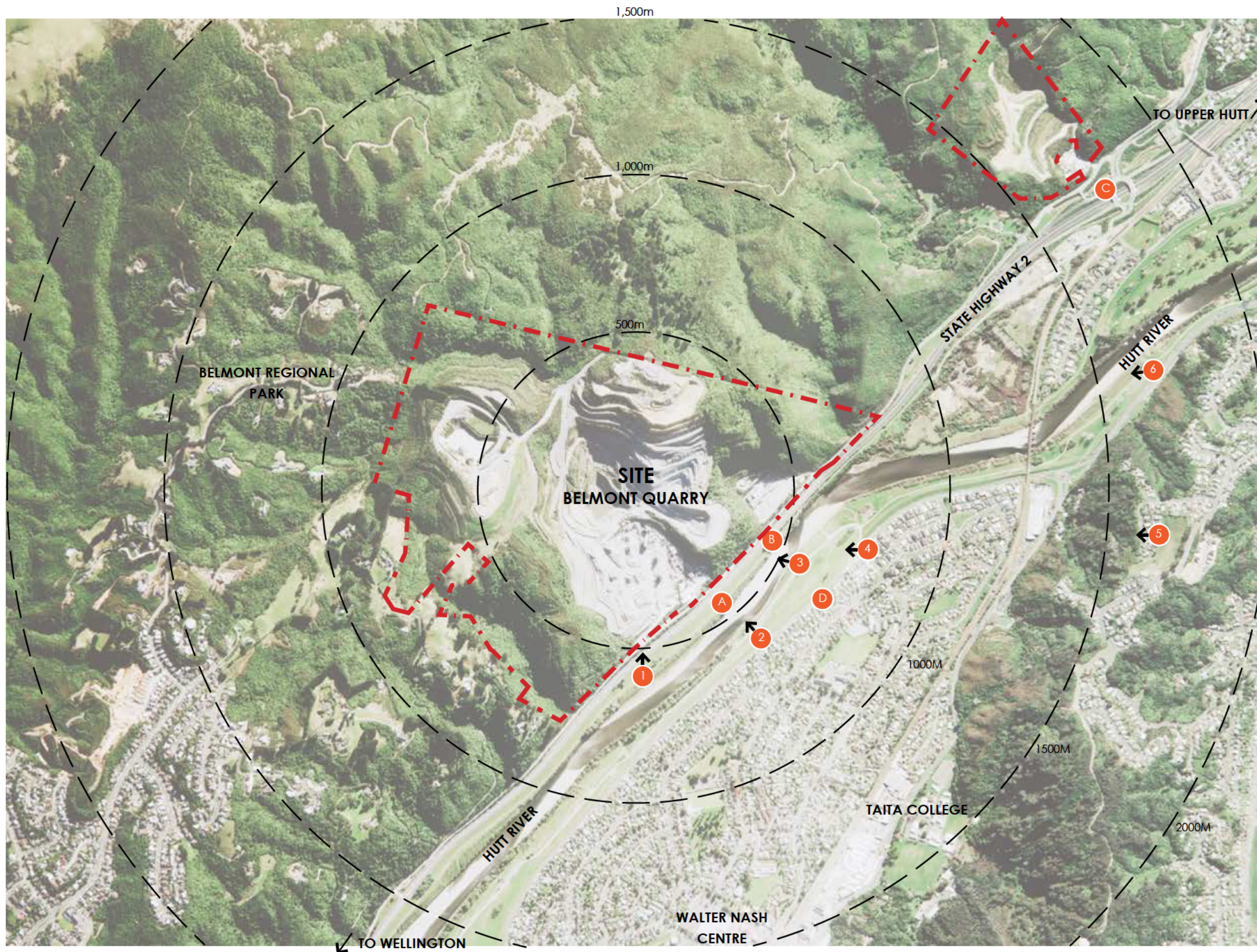
2023_076_WINSTONES AGGREGATES LIMITED_BELMONT QUARRY



A. SIMULATED VIEW - VEGETATION REMOVED



A. SIMULATED VIEW - RENDERED QUARRY



LEGEND (EXAMPLE)

CHARACTER PHOTOS

- A** View Southeast from SH2
- B** View Southwest towards Wellington from SH2
- C** View Northwest from SH2 on the Wellington-bound off ramp
- D** View from Southwest from Taita Drive

VIEWPOINT LOCATIONS

- 1** View North from the Hutt River walking trail
- 2** View Northwest from 1226 Taita Drive
- 3** View Northwest from the Rimutaka Cycle Trail
- 4** View West from Taita Rock River Trail
- 5** View southwest from 17 Whitechapel Grove
- 6** View southwest from Hutt River Trail

Site Boundary

A. LOCATION MAP (SCALE 1:2500 @A3)

Map / image source: Hutt City Council GIS

APPENDIX 2 - LANDSCAPE AND VISUAL IMPACT ASSESSMENT - MEMO SUBMISSION

CONTEXT - CHARACTER PHOTO AND VIEWPOINT LOCATIONS

2023_076_WINSTONES AGGREGATES LIMITED_BELMONT QUARRY





A View Southeast from State Highway 2. Showing the use of the area across the valley from Belmont Quarry.



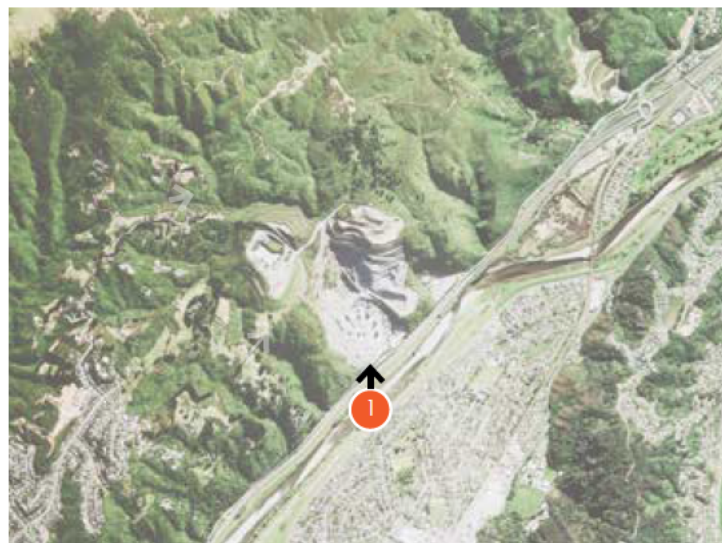
B View Southwest towards Wellington from State Highway 2. Showing the motorway parallel to Belmont Quarry and how the site is obscured by the existing terrain.



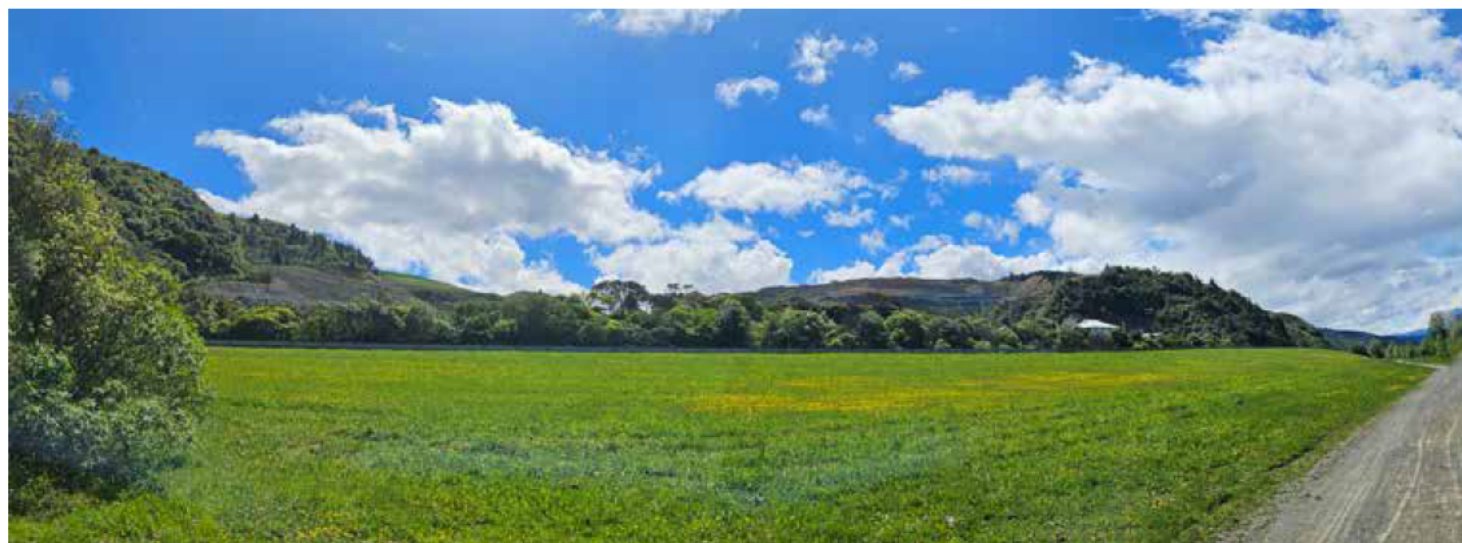
C View Northwest from State Highway 2 on the Wellington-bound off ramp. Showing the motorway and the existing landscape in the area.



D View from Southwest from Taita Drive. Showing the nearest residential road to Belmont Quarry across the Hutt River.



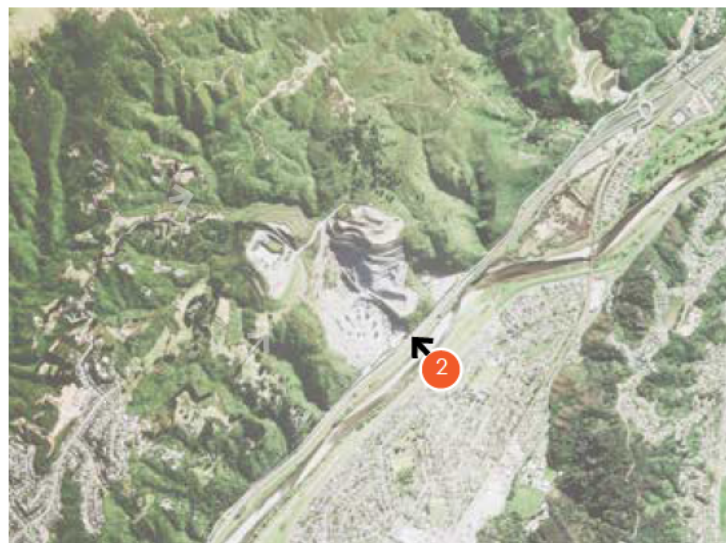
A. IMAGE LOCATION



B. EXISTING VIEW



B. PROPOSED VIEW



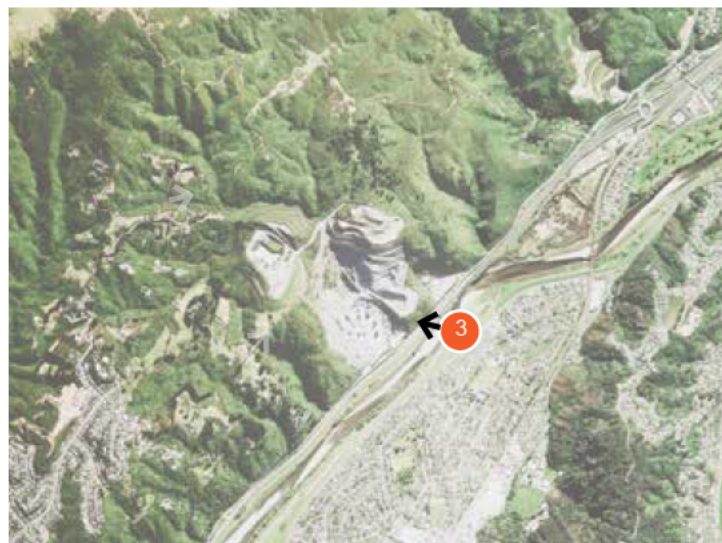
A. IMAGE LOCATION



B. EXISTING VIEW



B. PROPOSED VIEW



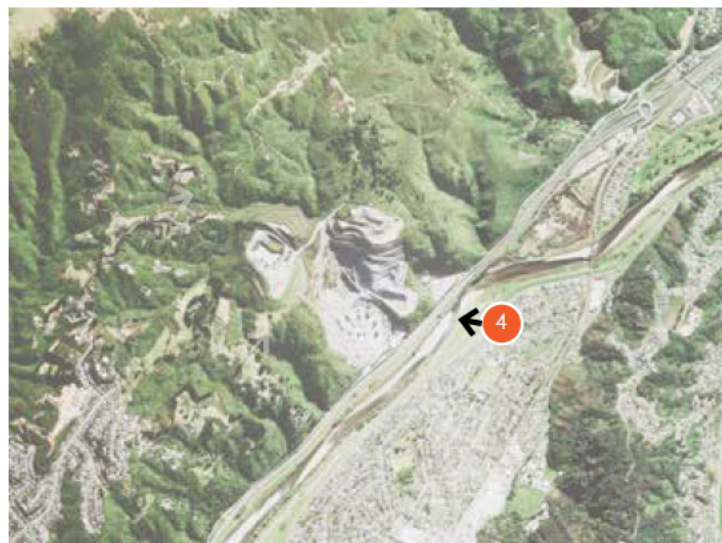
A. IMAGE LOCATION



B. EXISTING VIEW



B. PROPOSED VIEW



A. IMAGE LOCATION



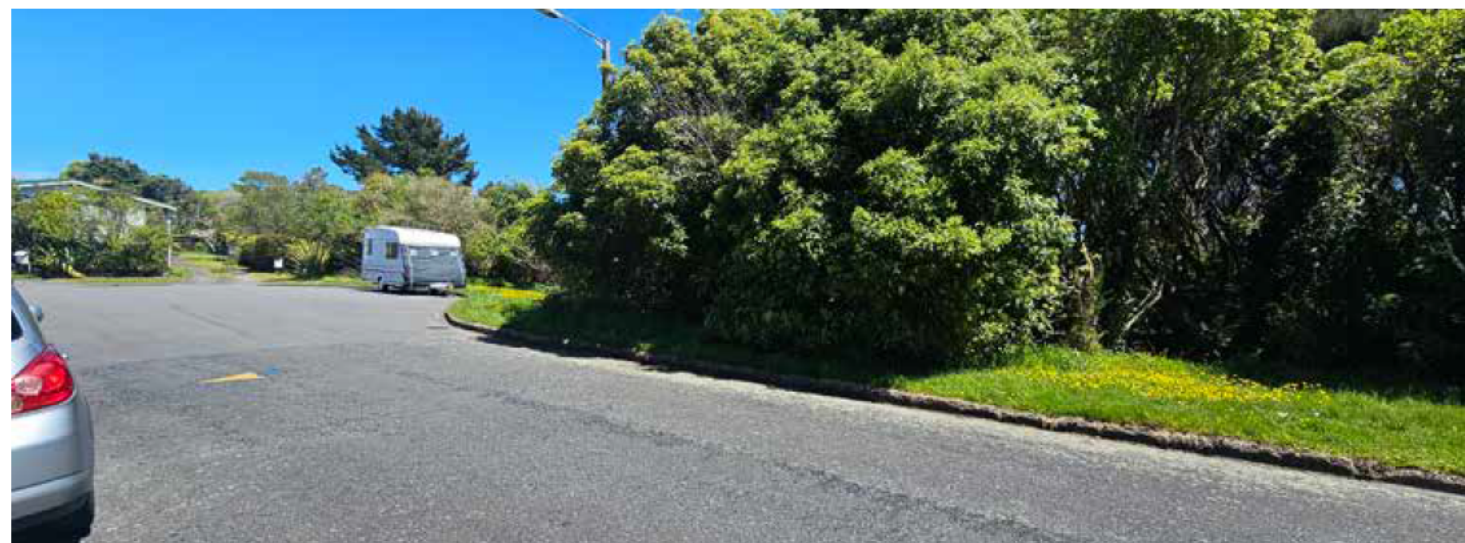
B. EXISTING VIEW



B. PROPOSED VIEW



A. IMAGE LOCATION



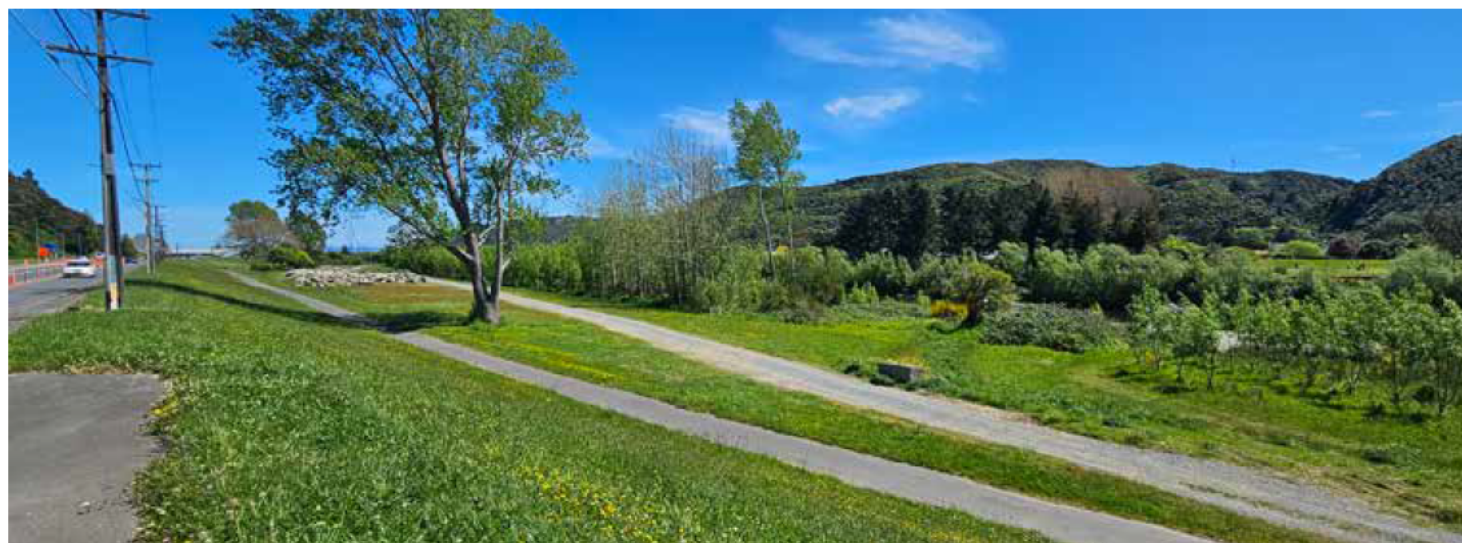
B. EXISTING VIEW



B. PROPOSED VIEW (SITE NOT VISIBLE FROM THIS VANTAGE DUE TO EXISTING VEGETATION)



A. IMAGE LOCATION

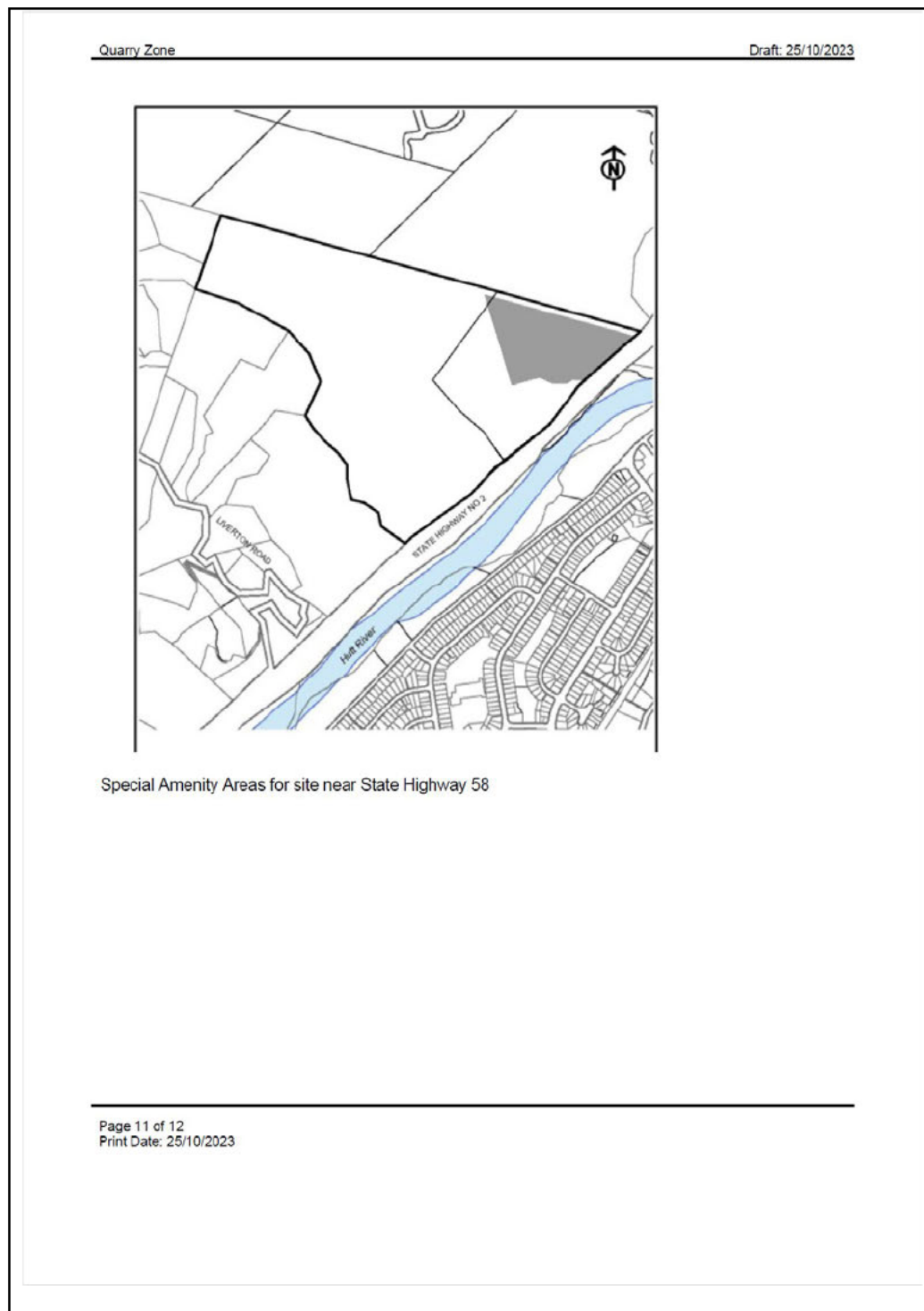


B. EXISTING VIEW



B. PROPOSED VIEW (SITE NOT VISIBLE FROM THIS VANTAGE DUE TO EXISTING VEGETATION)

Appendix B: Planning map - SAA



Appendix C: Provisions table

Provision	Comment/ Suggested amendment
QUARZ -4- Vegetation in Quarry Zones	<p>Request to remove the provision regarding the “retention of existing vegetation and planting of indigenous vegetation” in QUARZ-P4. Winstone Aggregates seeks clarity and potential modification of this provision, as vegetation stripping is an inherent part of quarrying operations.</p> <p>Rationale: Retaining vegetation in active quarry zones is not feasible due to the nature of quarrying activities. We propose working with Hutt City Council to develop practical guidelines that balance operational needs with environmental considerations by way of bespoke provision in the Quarry Zone.</p>
QUARZ - R5 Quarrying Activities Permitted activity Rule QUARZ-R3 construction of new buildings and structures and alterations and additions to existing buildings and structures	<p>Removal of these standards from the permitted activity rule:</p> <ul style="list-style-type: none"> For Belmont Quarry Deletion of QUARZ-R5(1)(a)(iii) Vibration associated with blasting; For Belmont Quarry QUARZ-R5 (1)(a)(iv) indigenous vegetation buffer strip; and For Belmont Quarry QUARZ-R5(1)(a)(v) Special Amenity Areas <p>Rationale: set out in main letter and to reflect other relief sought.</p> <p>Removal of 1 (a):</p> <ul style="list-style-type: none"> For Belmont Quarry (ii) Indigenous Vegetation Buffer Strip; For Belmont Quarry (iii) QUARZ -S6 Special Amenity Areas. <p>Rationale: For reasons set out above and in letter and (below).</p>
QUARZ- S4 And associated notes on vibration NOISE -S6- Acoustic Insulation and ventilation for noise sensitive activities in certain zones – Quarry Zone. NOISE -APP1 Noise limits by emitting and receiving zone – Quarry Zone.	<p>Winstone supports the intention of HCC to use of updated standards and best practice in respect of noise and vibration effects, but is currently undertaking work to determine the impact of these on its current operations, noting they result in a reduction for the noise limits for quarry operations.</p> <p>Winstone has engaged StylesGroup (acoustic expert) to provide further advice on the Draft Plan provisions and recommend changes to the vibration, noise standards, and how these are measured, and noise sensitive activities provisions to ensure that they strike the right balance, improve the workability of these provisions from a compliance perspective, while ensuring that quarry operations can be accommodated and that compliance can be achieved. Winstone look forward to sharing this advice with Council in due course.</p>

Provision	Comment/ Suggested amendment
QUARZ-S2	Matter of discretion (2) minor amendment suggested to improve clarity of wording add an "and" between "zones" and "effects".
QUARZ- Maps	Update Maps to remove Special Amenity Area and 25 m Vegetated Buffer Strip on Boundary of Belmont Quarry.
GRUZ-P10 – Quarry Protection Overlay	<p>Support for protection of quarry operations from reverse sensitivity effects via a Quarry Protection Overlay Area and associated provisions.</p> <p>Suggest the GRUZ -R2 (buildings in the residential quarry overlay) is a discretionary activity and quarry operator is notified as an affected party as part of that process to ensure that proposed use does not adversely impact on the future quarrying activities or sterilise resource.</p>
TRAFFIC CHAPTER	Add "Quarry Activities" to Table 8 with "no threshold" for the reasons set out in the letter. Suggest exemption from other parts of the traffic chapter is sought for the reasons explained in the cover letter transport, parking, haulage and loading relevant are components of quarrying activities with distinct requirements and are already provided for in the Quarry Zone provisions.
EARTHWORKS CHAPTER	Winstone seek confirmation that activities provided for within the definition of "quarrying activities" including clean filling, extraction and overburden are not inadvertently captured by rules in the earthwork chapter. Adequate controls are provided in the Quarry Zone rules to manage these effects.
NATURAL HAZARD CHAPTER	<p>As per the letter Winstone seek removal of the overflow path and inundation area from the Hazard mapping, as these are not accurate given the inevitable changes in topography due to quarrying activity over time and seeks exemption from the Natural Hazard Chapter, noting the proposed flood hazard and overland flow path rules are predominately aimed at buildings and structures (RDA rule) and cannot be easily applied to quarrying activities – a bespoke solution within the Quarry Zone is sought given the detailed understanding that Winstone has of the sites hazard profile and topographical changes that occur due to progressive quarrying of the site.</p> <p>Amendment would also be required to Chapeaux of Quarry Zone (para four) to make it clear which Chapters the Quarry Zone is exempt from (i.e. which rules do not apply).</p>

Saritha Shetty

From: wendy thompson <wdenisethompson1@gmail.com>
Sent: Wednesday, 15 November 2023 1:11 pm
To: District Plan Review Team
Subject: [EXTERNAL]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

The only problem I hav with a shared zone on 75a Eastern hutt road, is if it's a business, to much traffic on drive, it is a shared driveway and parking on road, trucks take up the parking out front now and we can never see what's coming. And if the business was noisy. Thanks Wendy .

Saritha Shetty

From: Ami Coughlan <acoughlan@fishandgame.org.nz>
Sent: Friday, 15 December 2023 9:25 am
To: District Plan Review Team
Subject: [EXTERNAL] Hutt City Council Draft District Plan Submission of Wellington Fish and Game
Attachments: Outlook-rq1i3fkx; Submission on the City of Lower Hutt Draft District Plan .pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good morning

Please find attached the submission from Wellington Fish and Game Regional Council on the Hutt City Draft District Plan.

We appreciate the opportunity to submit on this draft plan, and wish to be heard in relation to our submission.

Kind regards

Ami Coughlan | Resource Officer

Wellington Fish & Game Council

292 Featherston Street, Palmerston North | PO Box 1325 Palmerston North 4440

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Submission on the City of Lower Hutt Draft District Plan

Wellington Fish and Game Council

1. Wellington Fish and Game Council (WFGC) submits Draft District Plan (DDP) of Hutt City Council (HCC). WFGC confirms that it wishes to exercise its right to be heard in relation to this submission.
2. WFGC is the statutory body established under the Conservation Act 1987 responsible for the management of sports fish and gamebird resources in the Wellington Fish and Game region. Several of the gamebird species under WFGC's management are indigenous to New Zealand, and so WFGC shares a particular interest in the maintenance of New Zealand's indigenous biodiversity alongside the interests of mana whenua and other New Zealanders.
3. WFGC's statutory management functions include the maintenance and enhancement of the habitat of sports fish and game – the rivers, lakes, streams and wetlands within which sports fish, gamebirds, and many indigenous taonga species thrive. WFGC is tasked by statute to advocate for protection and restoration of these habitats and works with Greater Wellington Regional Council (GWRC), mana whenua and community groups on habitat protection and restoration throughout the GWR.
4. In discharging its statutory responsibilities, WFGC represents the interests of over 8000 license holders (sports fish anglers and game bird hunters) in the Wellington region, many of whom fish in the Hutt River and surrounding rivers, streams, and waterways. These recreational pursuits are part of New Zealand's cultural heritage and are woven into the fabric of our society and ethos.
5. Many of these license holders are also rate payers and WFGC expects that their interests and the interests of all ratepayers in the region will be fairly represented in the HCC DDP and into the future.

Summary of Submission

WFGC welcomes the stated focus of the DDP of environmental protection, indigenous biodiversity, natural features and landscape, natural character, public access, coastal environment and managing risks of natural hazards with a growing population.

WFGC appreciates the acknowledgement of statutory requirements and social and economic wellbeing as factors to take into account while protecting, enhancing, and preserving indigenous biodiversity as a priority. It is hoped that allows for the Resource Management Act 1991 (RMA) and the National Policy Statement for Freshwater Management 2020 (NPS-FM) Policy 10 (both national legislation frameworks direct protections to trout and salmon habitat) to continue also be appropriately allowed for, and recognition of valued introduced species as part of a healthy ecosystem where this is the case.

Specific provisions

Clause	Description	Relief
REG-O1	Development Renewable Energy Generation (REG) designed, located, constructed, operated, maintained and upgraded to: <ul style="list-style-type: none"> 1) Avoid remedy or mitigate adverse effects on the env and 2) Promote local regional and national benefits of the use and development of REG resources. 	Support. It is important that renewable energy generation does not contribute towards further degradation of the environment.
REG-O2	Small-scale REG and the identification and assessment of potential REG electricity sources are enabled in appropriate locations	Support
REG-P2	Enable small-scale REG to be developed and operated in a manner that avoids, remedies, or mitigates adverse env effects.	Support
REG-P3	Enable the identification and assessment of potential REG energy sources and sites in a manner which avoids, remedies, or mitigates adv env effects.	Support
REG-P4	Provide for operation, maintenance and development of community and commercial-scale REG activities while recognising that they have potential to cause significant adverse effects on the environment, and may be inappropriate in some locations.	Support with amendment. Reword to give greater weight to the appropriate location and design of REG on these scales. <i>“Provide for operation, maintenance and development of community and commercial-scale REG activities <i>where they are appropriately designed, located, constructed, operated, maintained, and upgraded to avoid remedy or mitigate adverse effects on the environment.</i>”</i>
REG-P6	Encourage REG providers of any scale to consult early with the local community including Māori on appropriate placement location and design.	Support with amendment. Include stakeholders in this consultation policy, as stakeholders often have a wealth of knowledge developed over time. <i>“Encourage REG providers of any scale to consult early with the local community including Māori <i>and stakeholders</i> on appropriate placement location and design.”</i>

REG-P7	Protect consented and existing REG from incompatible subdivision land use and development.	Reverse sensitivity issues for pre-existing activities should not block new land uses which lead to improvements in environmental health, and should not override the guidance from national policy, including the National Policy Statement for Freshwater Management (NPS-FM 2020), the Resource Management Act (RMA 1991) and the Natural and Built Environment Act (NBA 2023).
INF-O2	The adverse effects of infrastructure are managed while recognising the functional and operational needs of infrastructure	There is a need for infrastructure to be increasingly managed in a way which contributes to ecosystem health and climate change resilience. The RiverLink project at Melling is an example of this.
INF-O3	Adverse effects of subdivision, use and development on the function and operation of infrastructure are managed.	Reverse sensitivity issues for pre-existing activities should not block new land uses which lead to improvements in environmental health, and should not override NPSFM etc.
INF-P2	Provide for infrastructure by <ul style="list-style-type: none"> 1) Enabling safe, resilient, effective and efficient operation, maintenance, repair, minor upgrade or removal of existing infrastructure; 2) Enabling investigation, monitoring and navigation activities associated with inf operations, and 3) Providing for significant upgrades to, and the development of new inf 	Infrastructure and supporting activities should be carefully managed to avoid adverse effects on the environment.
INF-P4	Manage the adverse effects of upgrades to, or the development of new infrastructure, including effects on: <ul style="list-style-type: none"> 1) Natural and physical resources 2) Amenity values 3) Sensitive activities 4) Natural hazard risk 5) The identified values of areas within District Plan overlays 6) Safe and efficient operation of other infrastructure 	Support

	7) The health, well-being, and safety of people and communities	
INF-P5	When considering adverse effects of infrastructure on the environment recognise there may be situations where all adverse effects, including construction effects, cannot be avoided and must be mitigated through having regard to the following:	The clauses suggested as needing to have regard to are not remedies or mitigations of adverse environmental effects, they are reasons why the infrastructure activities have a functional need. Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts should be avoided, remedied, mitigated or minimised using the effects management hierarchy and best practice.
INF-P6	Manage the effects on infrastructure from subdivision, land use and development	Reverse sensitivity issues for pre-existing activities should not block new land uses which lead to improvements in environmental health, and should not override NPSFM etc.
INF-P11	Provide for upgrades and development of the National Grid while 1) having regard to extent to which adv effects have been avoided, remedied, and mitigated 4) seeking to avoid adverse effects on SCHEDX areas outstanding natural features, coastal high natural charact areas, significant natural areas, special amenity landscapes and open space and recreation zones, 5) considering opportunities to reduce existing adverse effects of national grid as part of any substantial upgrade	Support
INF-P12	Provide flexibility to adopt new technologies for infrastructure that 4) result in environmental benefits or enhancements, 5) promote environmentally sustainable outcomes.	Strongly support these clauses and commend their inclusion in the plan.
INF-P13	Provide for new or upgraded infrastructure in natural hazard overlays	Support
INF-P14	New or upgraded infrastructure in coastal or riparian margins where: 1) there is a functional or operational need to be in that location,	Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts

		should be avoided, remedied, mitigated, or minimised using the effects management hierarchy and best practice.
INF-P15	Provide for new or upgraded infrastructure in coastal character overlays with High, Very High, and Outstanding Coastal Character where: 1) there is a functional or operational need to be in that location, 3) adverse effects on the identified values of the High, Very High, and Outstanding Coastal Character Overlays are avoided	Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts should be avoided, remedied, mitigated, or minimised using the effects management hierarchy and best practice.
INF-P16	Provide for new/upgraded infrastructure in Outstanding Natural Features (ONF) and Outstanding Natural Landscapes (ONL) where: 1) there is a functional or operational need to be in that location 3) and adverse effects on the identified values of the Outstanding Natural Features and Outstanding Natural Landscapes are avoided	Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts should be avoided, remedied, mitigated, or minimised using the effects management hierarchy and best practice.
THW-O2	There is no increase in offsite stormwater peak flows/ volumes as a result of subdivision and development in urban areas	Support
THW-O3	Quantity and quality of stormwater runoff from new subdivision and development are managed to not increase any flood risk and to maintain or improve the health of freshwater ecosystems.	Strongly support
THW-P2	Only allow for subdivision, use, and development in urban areas with insufficient existing three waters capacity where: 2) It can be demonstrated that there is an acceptable alternative solution that: b) avoids adverse effects on the health and well-being of water bodies and freshwater ecosystems; c) does not result in increased flood risk, increased wastewater overflows or reduces water pressure in reticulated water network	Support
THW-P3	Require new subdivision to achieve hydraulic neutrality (discharge of stormwater to the receiving environment managed to the rate of offsite stormwater discharge is reduced to be at or below the modelled peak flow / volume for each site prior to subdivision occurring	Support

THW-P4	Require new subdivision and development in urban areas to incorporate water sensitive design methods and be designed, constructed, and maintained to: 1) improve the health and well-being of water bodies and freshwater ecosystems 2) avoid or mitigate off-site effects from surface water runoff including the increase of downstream flood risks, and; 3) be in accordance with available guidance and best practice solutions for the management of stormwater quality and quantity from the subdivision or development at the time	Support
Natural Character – Coastal and Riparian Margins (NATC)	Applies a setback to these areas – not mapping. Land within horizontal distance of 10m from seaward boundary of coast, the bank of a river or the edge of a lake. Gives effect policy 43 of RPS (enhance/maintain ecological function of riparian margins, protection and reinstatement of riparian habitat)	Support
NATC-O1	Natural character of coastal and riparian margins preserved and protected from inappropriate subdivision, use and development, and enhanced where appropriate	Support
NATC-P4	Provide for use and development within coastal margins and riparian margins where: <ol style="list-style-type: none"> (1) the proposed use and development c) does not limit or prevent public or customary access to, along, or adjacent to waterbodies or coast; (2) there is a functional need for the use or development to be located and no alternative locations are practicable 	<ol style="list-style-type: none"> (1) c) support (2) Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts should be avoided, remedied, mitigated, or minimised using the effects management hierarchy and best practice.
NATC-P5	Avoid all other use and develop within coastal and riparian margins unless: <ol style="list-style-type: none"> 1) (b) maintains any existing public or customary access 2) There is a functional or operational need for the use or development to be located and no alternative locations are practicable 	<ol style="list-style-type: none"> 1) b) support 2) Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts should be avoided, remedied, mitigated, or minimised using the effects

		management hierarchy and best practice.
Natural Features & Landscapes (NFL)	Protect identified outstanding natural features and landscapes and manage the effects of subdivision, use and development on the identified values. <ol style="list-style-type: none"> 1. South Coast (ONL) 2. Turakirae Head (ONF) 3. Baring Head (ONF) 4. Parangarahu Lakes (ONF) 5. Somes Island (ONL) 6. Ward Island (ONF) 7. Rimutaka Range (ONL) 	Support
NFL-O1	The characteristics and values of ONF and ONL are protected	Support
NFL-P3	Provide for: <ol style="list-style-type: none"> 1) The restoration or rehabilitation of landscape character values identified (later) where: <ol style="list-style-type: none"> a) It recognises and enhances the landscape character values present b) It encourages the natural regeneration of indigenous species, while recognising the need for pest management, and c) It creates or enhances habitat for indigenous species. 	Maintains and protects habitat for trout and salmon Trout and salmon habitat is also protected under the RMA (1991), NPS-FM (2020), and the NBA (2023). This could be added into this policy: <ol style="list-style-type: none"> d) Creates or enhances habitat for trout and salmon where this is consistent with c).
NFL-P7	Mining, quarrying, plantation forestry in ONL and ONF are managed as follows...	Where there is a functional need for infrastructure and supporting activities to occur in certain locations and times, then the consequent adverse environmental impacts should be avoided, remedied, mitigated, or minimised using the effects management hierarchy and best practice. This could be references as clause 2) b)
Public Access (PA)	Ensure the maintenance and enhancement of public access to, adjacent to, and along the coastal marine area, lakes, and rivers.	Support

PA-O1	Public access to and along rivers, lakes, and the coast is maintained and enhanced	Support
PA-O2	Public access does not have a negative impact on identified natural, heritage or cultural values, or public health and safety.	Support with amendments. Any loss of access should be replaced with like-for-like access, and this should be explicitly mentioned in the Plan.
PA-P1	Allow activities within coastal and riparian margins where they do not limit or prevent public access to, along, or adjacent to rivers, lakes, and the coastal marine area	Support
PA-P3	Only allow for the restriction of public access where: 2) Alternative options and routes to maintain access have been considered and provided where practicable	Support with amendments. Any loss of access should be replaced with like-for-like access, and this should be explicitly mentioned in the Plan.
Introduction	Subdivision adjacent to lakes, rivers, and the coastal marine area. Will generally require the establishment of esplanade reserves or strips to provide opportunities for better access to these features and to help maintain or enhance a range of values inclusion conservation values associated with ecological characteristics of surface water and the coast and can assist with natural hazard mitigation.	Support
SUB-O1	Subdivision results in a well-functioning environment that enables all people and communities to provide for their social, economic, and cultural well-being while safeguarding the life supporting capacity of the environment.	Support
SUB-O2	Subdivisions results in development patterns and allotments that: 4) provide for and protect identified natural environment, historical and cultural values	Support
SUB-O4	The network of esplanade reserves and esplanade strips is progressively increased and contributes to the maintenance, enhancement, and protection of public access, ecological values, amenity values, and recreational values.	Strongly support.
Activities on the Surface of Water (ASW)	Provide for activities while manage the effects of these activities on the surrounding environment (swimming, boating, fishing including customary fishing, some river management activities).	Support
ASW-P1	Enable activities on the surface of water that have a low impact, including fishing, rafting, and swimming.	Strongly support
ASW-P2	Provide for motorised activities on the surface of waterbodies where recreation values, amenity values, natural character values, and ecological values of waterbodies are protected	Support

ASW-P3	Recognise the benefits of activities in rivers and lakes that manage natural hazard risks and the health of the waterbody.	This clause needs to take into account Te Mana o te Wai, and activities which degrade the ecosystem and mauri of the waterbody (such as gravel extraction, ripping and raking, and control and command flood works) should be minimised where possible and better solutions for people and communities to co-exist with waterways should be actively explored now and into the future.
CE-O1	The natural character within the landward extent of the coastal environment is maintained and, where appropriate, restored or enhanced	Support
CE-O2	The identified characteristics and values of High, Very High, and Outstanding coastal natural character areas in the landward extent of the coastal environment are preserved and protected from inappropriate subdivision, use, and development.	Support
CE-O6	Green infrastructure is the primary method used to reduce damage from sea level rise, coastal inundation and coastal erosion. (A natural or semi-natural area, feature or process, including engineered systems that mimic natural processes, which are planned or managed to: <ul style="list-style-type: none"> a. provide for aspects of ecosystem health or resilience, such as maintaining or improving the quality of water, air or soil, and habitats to promote biodiversity; and b. provide services to people and communities, such as stormwater or flood management or climate change adaptation.) 	Support
CE-P4	Provide for: <ol style="list-style-type: none"> 1. The restoration or rehabilitation of natural character values within the landward extent of the coastal environment by: <ul style="list-style-type: none"> a. Recognising the values present that could be enhanced; b. Encouraging natural regeneration of indigenous species, including where practical the removal of pest species; 	<ol style="list-style-type: none"> 1) a) support b) pest species can't be sports fish or game birds, if any species managed by Fish and Game are thought to possibly be undesirable in certain specific location, management of the species and should be identified and worked out with Fish

	<ul style="list-style-type: none"> c. Rehabilitating dunes or other natural coastal features or processes; d. Restoring or protecting riparian and coastal margins; e. Removing redundant structures that do not have heritage or amenity value; and f. Modifying structures that interfere with coastal or ecosystem processes. <p>2. Restoration or rehabilitation undertaken by Mana Whenua to exercise their responsibilities as kaitiaki to protect, restore and maintain the natural character of the coastal environment.</p>	<p>and Game, relevant councils, Department of Conservation, and iwi.</p> <p>d) support</p>
CE-P6	<p>3) B) iv) there is a functional or operational need for the activity to locate in the area</p>	<p>If there is a functional need for the activity to occur, then the effects management hierarchy should be embedded in this clause as a directive for future consent pathway as per the NPS-FM 2020 3.21</p>
CE-P7	<p>Mining, quarrying and forestry activities in the coastal environment are managed as follows: Avoid the establishment of new mining, quarrying and forestry activities within the coastal environment unless:</p> <ul style="list-style-type: none"> a. Any adverse effects on the natural character of the Coastal Environment can be avoided; b. There is a functional or operational need for the activity to locate in the area; and 	<p>If there is a functional need for the activity to occur, then the effects management hierarchy should be embedded in this clause as a directive for future consent pathway as per the NPS-FM 2020 3.21</p>
EW-O1	<p>Earthworks are undertaken in a manner that:</p> <ul style="list-style-type: none"> 1. Is consistent with the anticipated scale and form of development in the underlying zone; 2. Minimises adverse effects on the natural environment, including changes to natural landforms; 	<p>Support</p>

	<ol style="list-style-type: none"> Minimises adverse effects on visual amenity values; Minimises erosion, dust and sediment effects beyond the site boundary; Does not cause or exacerbate risks from natural hazards; Minimises risks associated with slope instability; and Protects the safety of people and property. 	
EW-P1	<p>Enable minor earthworks where:</p> <ol style="list-style-type: none"> The stability and structural integrity of land, infrastructure and buildings is not compromised; Erosion, dust, and sedimentation effects on land and water bodies are minimal; and Effects on visual amenity are insignificant. 	Earthworks of any size should not input sediment into freshwater.
EW-P2	Enable earthworks associated with subdivision, use and development where:	Earthworks of any size should not input sediment into freshwater.
EW-P3	Recognise the benefits of and enable earthworks required for the development, repair, and maintenance of public walking and cycling tracks	Earthworks of any size should not input sediment into freshwater.
EW-P4	Enable earthworks for the purpose of maintaining and constructing farming tracks associated with permitted activities in the Rural Zones where the earthworks are of a scale that:	Earthworks of any size should not input sediment into freshwater.
EW-P5	Provide for earthworks in Flood Hazard Overlays where they would not significantly increase the flooding risk, when compared to the existing situation, to the site, or neighbouring properties through:	Earthworks of any size should not input sediment into freshwater, or remain in a state where they can be input into floodwaters at a later stage. Earthworks should not increase flood risk at all.
EW-P6	Earthworks associated with Natural Hazard Mitigation works are managed as follows:	Earthworks of any size should not input sediment into freshwater.
EW-P7	Require earthworks to be designed and carried out in a manner that maintains slope stability and minimises the risk of slope failure associated with natural hazards, having regard to the effect of climate change	Support
EW-P8	Earthworks on sites and in areas of significance to Māori are managed as follows:	Earthworks of any size should not input sediment into freshwater.

EW-P11	Earthworks within identified Outstanding Natural Features and Landscapes are managed as follows:	Earthworks of any size should not input sediment into freshwater.
EW-P12	Earthworks within coastal margins and riparian margins are managed as follows	Earthworks of any size should not input sediment into freshwater. 2) (d) Earthworks should not increase flood risk at all
EW-P13	Earthworks within High, Very High, and Outstanding Coastal Natural Character Areas are managed as follows	Earthworks of any size should not input sediment into freshwater.
EW-P14	Earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor are managed as follows:	Earthworks of any size should not input sediment into freshwater.
NH-O3	Risk to people, buildings, and infrastructure from flood hazards is reduced through mitigation works.	Te Mana o te Wai, the RMA, and the NPS-FM 2020 all speak to the requirement to balance the need to protect human communities and infrastructure with the need to improve our rivers, streams, and waterways. Flood mitigation works often currently involve constraining and channelising the river and controlling water flow with hard engineered solutions. Unfortunately, these solutions degrade the river, become barriers to fish passage, remove habitat heterogeneity, and ultimately increase flood hazard risk in cases of flood protection breach. Allowing the river room to move, lateral space to flood and flow, and more natural characteristics should be actively investigated, as it is around the world, to balance these needs.
NH-P2	Levels of risk: Subdivision, use and development manages the natural hazard risk to people, buildings and infrastructure by: 3) avoiding subdivision, buildings and activities in the high hazard areas of the Natural Hazard Overlays unless there is an operation need or functional need for the building or activity to be located in this area and the building or activity mitigates the existing risk from natural hazards to people, buildings, and infrastructure	If there is a functional need for the activity to occur, then the effects management hierarchy should be embedded in this clause as a directive for future consent pathway as per the NPS-FM 2020 3.21

NH-P3	Maintain and enhance natural systems and features where they will reduce the existing risk posed by natural hazards to people, buildings, and infrastructure	Support
NH-P5	Encourage the use of green infrastructure or Mātauranga Māori approaches when undertaking natural hazard mitigation works...	Support

Conclusion

WFGC is highly supportive of the ecosystem and freshwater health focus of this Proposed Draft District Plan Change.

WFGC wish to see plans, policies, objectives and rules regarding natural hazards and highly productive land use which also focuses on restoring and protecting wetlands, waterways and rural land for the health and resilience of human environments and for indigenous and valued introduced species.

However, the lack of consultation during the drafting process with WFGC as statutory managers of the sports fish and game bird resources raises concerns regarding whether the process of the NPSFM 2020 has been followed correctly, particularly Section 3. 2 (b), which requires every regional council to engage with communities and tangata whenua to identify environmental outcomes and other elements of the NOF.

While it is generally the role of the Regional Council to look at wider environmental issues, the RMA does clarify that it is the role of local authorities to set rules and requirements to manage activities to ensure building, clearing vegetation, moving earth, disposing of rubbish or hazardous goods and contaminated soil or taking water from a stream does not harm communities or damage the air, water, soil, and ecosystems. WFGC appreciates that there have been many steps taken which are putting the health of the environment in focus but considers there is more work to be done to set objectives, policies, and rules with enough specificity to allow for setting resource consent conditions to actively protect and restore degraded ecosystems.

Hutt City Council will need to adequately resource compliance and consenting teams to ensure consents are issued appropriately and managed to the standard needed to improve and restore waterbodies and wetlands in the region, and to increase the health of, and prevent loss of vital rural land.

WFGC look forward to future communication in the future.

We wish to be heard in regard to our submission.

Ami Coughlan

Resource Officer

Wellington Fish and Game

From: [Tim Lester](#)
To: [District Plan Review Team](#)
Subject: [EXTERNAL] District Plan Review Submission: Wellington Electricity Lines Limited
Date: Friday, 15 December 2023 12:52:42 pm
Attachments: [HCC District Plan Review Stage 1 \(Final\).pdf](#)

To whom it may concern,

Please find attached feedback from Wellington Electricity Lines Limited (WELL) on the Draft Proposed HCC District Plan.

Please confirm receipt of the attached via return email.

Regards

Tim Lester | Planner

Edison Consulting Group | *good people, great results*

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Wellington Electricity Lines Limited
DRAFT HUTT CITY PROPOSED DISTRICT PLAN

To Hutt City Council

Sent via email to: district.plan@huttcity.govt.nz

FROM: Wellington Electricity Lines Limited (WELL)
PO Box 31049
Lower Hutt 5040

Date 15 December 2023

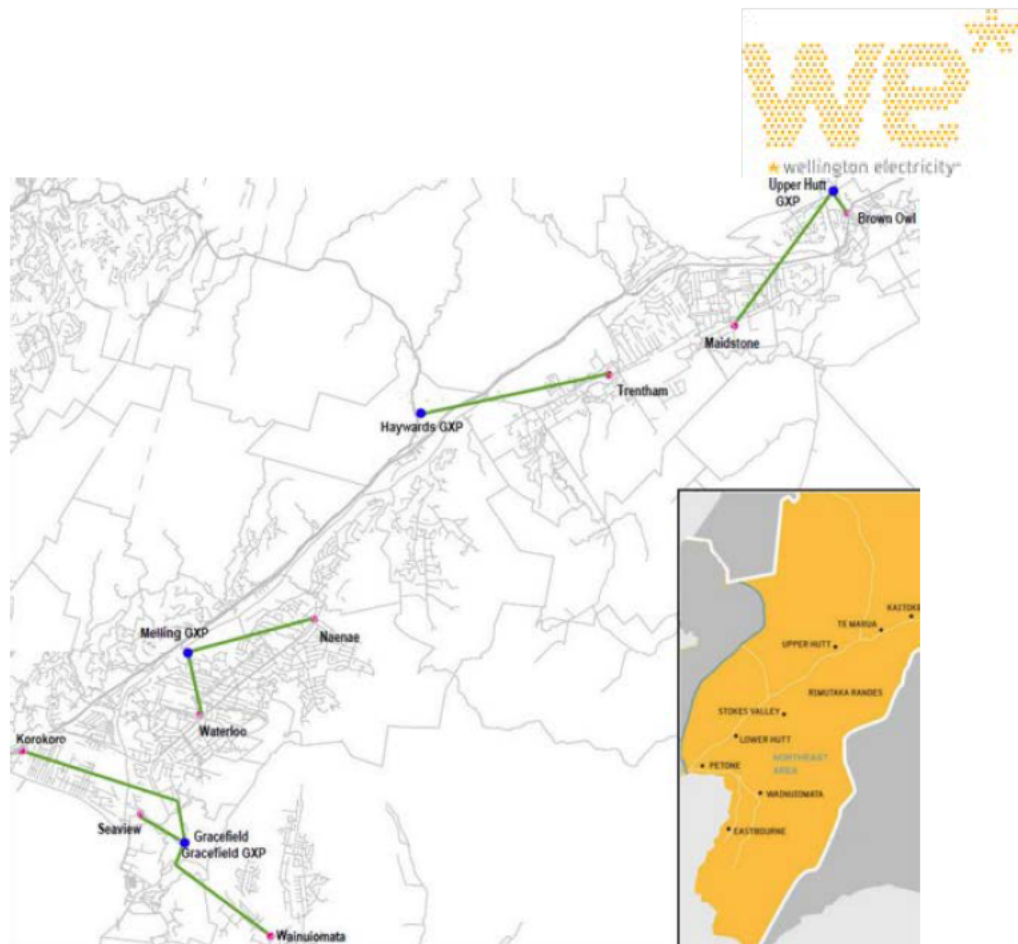
1.0 Introduction

- 1.1 Wellington Electricity Lines Limited ('WELL') appreciates the opportunity to provide comments in regard to the Hutt City Council (HCC) Draft Proposed District Plan ('DPDP').
- 1.2 HCC's district plan review process is being undertaken in stages, with this stage (DPDP) being the initial consultation phase that will assist directing HCC's next district plan.
- 1.3 In providing this feedback, high-level comments have been presented by WELL in order to inform the next district plan review stage – being the RMA Schedule 1 notified *Proposed Hutt City District Plan*.
- 1.5 WELL are pleased to provide HCC with the following feedback table as applicable to the nature and scope of Council's District Plan Review process.

2.0 Submission Context: Wellington Electricity Lines Limited

- 2.1 Wellington Electricity Lines Limited owns and operates electricity distribution network assets within the Wellington Region - inclusive of the Lower Hutt District (see image below).
- 2.2 WELL is committed in its regulatory obligation to provide consumers in Lower Hutt with an effective, safe, and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities and industry.
- 2.3 WELL owns distribution substations, lines and cables located in public road reserve, as well as on private property and along easements.
- 2.4 As indicated below, WELL own and operates critical¹ high voltage lines across the Hutt District and has particular interest in the review of district plan objectives, policies, rules and performance standards that have the potential to impact the safe and efficient operation of such *Regionally Significant Infrastructure*.
- 2.5 By providing this initial feedback it is the intention that the coverage of matters, directly or indirectly, pertaining to WELL's infrastructure operation and development in the next district plan iteration are at an appropriate level – and furthermore, that such coverage is enabling for security of supply of the district's electricity supply network.
- 2.6 To contextualise the following feedback from a local electricity distribution perspective, the Northeastern Area of WELL's network is supplied from the Upper Hutt, Haywards, Melling and Gracefield Grid Exit Points (GXPs), which in turn supply the Hutt Valley and the surrounding hills. The image below (taken from WELL's 2023 Asset Management Plan) shows the Northeastern Area subtransmission network configuration.

¹ Critical lines are high voltage lines that supply essential public services such as the hospital, civil defence facilities or Lifeline sites; or supply large industrial or commercial electricity consumers; or supply 1000 or more consumers; or are lines that are difficult to replace with an alternative electricity supply if they are compromised.



Wellington Northeastern Area Sub-transmission Network (Wellington Electricity AMP)

- 2.7 The purpose of the DPDP is to assist HCC to carry out its functions in order to achieve the purpose in Part 2 of the RMA.
- 2.8 WELL's electricity distribution infrastructure supports the sustainable management and efficient use of natural and physical resources as promoted in Part 2 of the RMA.
- 2.9 A fundamental part of enabling people and communities to provide for their social, economic and cultural wellbeing under section 5 of the RMA is the provision of a secure and efficient supply of electricity.
- 2.10 The benefits of WELL's electricity infrastructure in achieving sustainable management are also enshrined in the RMA through sections 7(b) and 7(ba); in achieving the purpose of the RMA, particular regard is to be given to "the efficient use and development of natural and physical resources" and "the efficiency of the end use of energy".

3.0 Submission: Overview

- 3.1 HCC have initiated their comprehensive district plan review process, with this stage (identified as the 'DPDP') inviting initial public consultation and interested party feedback.
- 3.2 Delivery of the DPDP consultation is the release of a set of definitions, objectives policies, rules and performance standards which have been developed, and which have been presented in a full draft of the Hutt City Proposed District Plan which is available on the Hutt City Council website.



- 3.3 This feedback from WELL has been prepared at a commensurate level to the nature and scope of the *DPDP* stage. In particular, WELL's comments have been provided associating how WELL's network and business interests relate to the strategic direction for 'Infrastructure' contained within the *DPDP*.
- 3.4 In consideration of the comments below, WELL has also previously provided feedback to the Ministry for the Environment in regard to the National Planning Standards (NPS). Where possible, the feedback provided in this submission will reflect that of the NPS, particularly in regard to 'Infrastructure'. WELL note that Council is cognisant of the NPS - with the *DPDP* being able to align with the intent of the applicable planning standards as well as being consistent with other territorial authorities within the Wellington Region.
- 3.5 HCC's comprehensive district plan review is very important for network utility operators as land use and subdivision development activities proposed throughout the District will often instigate customer-driven network utility infrastructure upgrading and development. Therefore, WELL's feedback is in the context of infrastructure integration being incorporated appropriately throughout the *DPDP*.
- 3.6 Upon reviewing the *DPDP*, WELL recommends that appropriate provisions/recognition is provided that will integrate the District's distributed electricity network.
- 3.7 WELL has reviewed the *DPDP* – and consequently has provided specific comment in relation to the draft provisions (Definitions, Objectives, Policies, Rules and Performance Standards). WELL has adopted a format that identifies a specific provision, and makes a subsequent statement regarding the level of support and/or suggested amendments or additional text.
- 3.8 WELL submits that a number of amendments are sought within the *DPDP* to ensure the document is able to be implemented and understood, and to enhance the provisions to provide for the importance of electricity infrastructure (as provided in Part 2 of the RMA).
- 3.9 The reasons for these changes and the specific relief sought by WELL to address its concerns are set out in the table below. If the specific relief is not accepted by Council, WELL alternatively requests that appropriate amendments be made to the provisions to give effect to the concerns raised by WELL.
- 3.10 WELL's substantive feedback submission is contained within the following table.

Signature for and on behalf of Wellington Electricity Lines Limited:

Tim Lester
021 993 223



tim.lester@edison.co.nz

Address for service:

Wellington Electricity Lines Limited
c/- Edison Consulting Group Ltd

PO Box 875

Hamilton 3240

Attention: Tim Lester

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
<i>Definitions</i>	<i>Cabinet</i>	WELL generally supports the proposed definition for a ' <i>Cabinet</i> ' to the extent that it explicitly includes a casing for the continued use of electrical equipment such as switchgear and transformers.
	<i>infrastructure</i>	WELL generally supports the proposed definition for ' <i>Infrastructure</i> ' as it clearly includes WELL's electricity distribution network.
	<i>(New Definition)</i> <i>Lines</i>	WELL consider that a definition for ' <u>Lines</u> ' is provided in the DPDP. It is recommended that the definition for Lines be taken from the Electricity Industry Act 2010, i.e.: " <i>lines means works used or intended to be used to convey electricity</i> " This additional term will support the definition for 'support structure' used throughout the DPDP.
	<i>network utility operator</i>	WELL generally supports the proposed definition for ' <i>network utility operator</i> ' as it clearly includes WELL's electricity distribution network.
	<i>operational need</i>	WELL generally supports the proposed definition for ' <i>operational need</i> ' as it is able to clearly include WELL's electricity distribution network and its requirement as linear infrastructure to locate in certain sensitive areas due to technical, logistical or operational characteristics or constraints.
	<i>(New Definition)</i> <i>Regionally Significant Infrastructure</i>	Notwithstanding the defined term ' <i>specified infrastructure</i> ' - WELL considers that it is appropriate for the DPDP to have a standalone definition for <u>Regionally Significant Infrastructure</u> . Furthermore, WELL considers that such a definition should be consistent with the Wellington Regional Policy Statement and Wellington Natural Resource plan -i.e.: ... " <i>facilities for the electricity distribution network, where it is 11kV and above. This</i>

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
		<p><i>excludes private connections to the local distribution network"</i></p> <p>In containing such a definition, WELL's critical high-voltage subtransmission network can be effectively recognised and provided for under the DPDP infrastructure, land use and subdivision provisions.</p> <p>It is noted that the recently released Decisions version of the Porirua District Plan also contains a RSI definition in which the above text is included.</p>
	<i>specified infrastructure</i>	WELL supports the definition for 'specified infrastructure' to the extent it includes services operated by a lifeline utility (i.e., electricity).
	<i>support structure</i>	<p>WELL supports the term '<i>Support Structure</i>' being identified in the DPDP; however, to take account of the role of such structures for electricity distribution purposes it is requested that 'Pole mounted equipment' is included under the definition.</p> <p>Such equipment includes pole mounted transformers, switches, capacitors and battery banks.</p> <p>The increase in residential density brought about by the NSPUD means that WELL's exiting network needs optimising in some sections. The explicit inclusion of pole mounted equipment will assist in service provision for higher density residential development.</p>
	<i>temporary activity</i>	<p>WELL consider that power generation should be included within the definition for '<i>temporary activity</i>'.</p> <p>Mobile generators are used for planned and unplanned power outages. Such use of these generators is on a temporary basis.</p>
	<i>well-functioning urban environment</i>	<p>WELL considers that the provision of '<i>Infrastructure</i>' as a defined term should be included in the definition for a 'well-functioning urban environment'.</p> <p>Without appropriate infrastructure urban environments will not be well functioning.</p>

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
REG – Renewable Electricity Generation	REG-P3 <i>Identification and assessment of potential renewable energy sources</i>	WELL considers that this policy should also recognise that assessment needs to include the transmission (or conveyance) of the renewable energy from the source. Effective assessment of the generation activity cannot be undertaken without consideration of how the energy is to be transported to users.
	REG-P5 <i>Technical and operational constraints</i>	WELL supports the policy's recognition of the electricity distribution network and the associated consideration for renewable energy generation.
	REG-R1 <i>Operation of renewable electricity generation facilities</i>	WELL seeks that REG-R1 include a reference (such as an advice note or additional performance standard) requiring compliance with Part 6 of the <u>Electricity Industry Participation Code</u> . Part 6 of the EIPC refers to connection of distributed generation and encompasses technologies, such as solar panel systems, wind turbines and micro-hydro schemes.
INF – Infrastructure	INF-O4 <i>Infrastructure Availability and Capacity</i>	WELL supports the objective as worded as, in relation to infrastructure capacity, it refers to <i>existing</i> and <i>planned</i> subdivision, use and development. Recognition of future development is a critical consideration for WELL when preparing their asset management plans and load growth forecasting.
	INF-P1 <i>Recognise benefits of infrastructure</i>	WELL generally agrees with this draft policy. Notwithstanding this general support, WELL consider the policy could be improved upon by including the defined term ' <u>Lifeline Utility</u> ' as per the Civil Defence Emergency Management Act 2002.
	INF-P2 <i>Provide for infrastructure</i>	WELL generally agrees with this draft policy. Notwithstanding this general support, WELL considers the policy could be strengthened through the inclusion of additional wording to the effect of protecting existing infrastructure from adverse effects

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
		associated with reverse sensitivity.
	INF-P3 <i>Coordinate provision of infrastructure</i>	<p>WELL supports this policy particularly in regard to encouraging the co-location of infrastructure, including the utilisation of existing designations and the use of roads as infrastructure corridors.</p> <p>Similarly, WELL supports the DPDP recognition of cross jurisdictional boundaries to ensure continuity for linear infrastructure.</p> <p>To recognise this support, further consideration from Council to include provisions and a defined term for Regionally Significant Infrastructure in the DPDP (as with the Porirua Decisions version of the PDP).</p>
	INF-P5 <i>Consideration of the adverse effects of infrastructure</i>	<p>WELL generally supports the provisions of this policy.</p> <p>Notwithstanding this general support, WELL seeks that reference to infrastructure standards and or legislation (such as <u>Electricity (Hazards from Trees) Regulations 2003</u>) or Codes of Practice (such as <u>New Zealand Electrical Code of Practice for Electrical Safe Distances</u> (NZECP 34:2001)) are included in the policy.</p>
	INF-P6 <i>Adverse effects on infrastructure</i>	<p>WELL seeks that this policy is broadened beyond just that of Gas and Electricity transmission.</p> <p>Such a policy should be applied to all Regionally Significant Infrastructure such as that defined in the WRPS and Natural Resource Plan (see definitions comments above regarding RSI inclusion).</p>
	INF-P7 <i>Undergrounding of infrastructure</i>	<p>Replace the word “<i>Encourage</i>” with “<i>Support</i>” in regard to underground infrastructure.</p> <p>Whilst ‘<i>practicable</i>’ and ‘<i>technically feasible</i>’ are suitable reasons to underground infrastructure – however, technical feasibility can be associated with unreasonable, or prohibitive costs with undergrounding in particular locations.</p>
	INF-P13, P15 & INF-P16 <i>New or upgraded infrastructure in natural</i>	<p>WELL seek that the word “<i>avoid</i>” is removed from the policies’ 3rd sub-clause, or alternatively have it amended so as to include “<i>or remedy or mitigate</i>” as suitable responses in any development application in the overlay areas.</p>

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
	<i>hazard overlays</i>	The use and interpretation of the word avoid is being effectively that of ‘prohibited’ in a legal sense. Such prohibitive wording should only be applied lightly or sparingly in the DPDP.
	INF-P18 <i>New or upgraded infrastructure in other overlays</i>	WELL seek that the word ‘ <u>operate</u> ’ is included within the policy so as to align with the <u>Electricity (Hazards from Trees) Regulations 2003</u> .
	INF-R17 <i>New substations, transformers, switching stations and ancillary buildings for the electricity network not contained in a cabinet</i>	<p>Given increased housing density across the district (MDRS under the NPSUD), WELL will be required to upgrade or otherwise optimise sections of their network through the use of pole mounted equipment (transformers, switches, capacitors, battery banks etc.).</p> <p>To help enable this requirement it is considered appropriate for provision to be made in the DPDP for pole mounted equipment – and for appropriate permitted activity performance standards to apply (particularly in the Residential Zone subject to MDRS).</p> <p>WELL has sought amendments above to the defined term ‘support structures’ to be inclusive of pole mounted equipment.</p> <p>WELL consider that INF-R17 should be amended so as to include pole mounted equipment which does not meet the definition for a ground-mounted cabinet regulated under the NESTF.</p>
	INF-S1 <i>Upgrading of aboveground infrastructure</i>	Clause 1 only relates to a telecommunication line. Electricity lines should also be explicitly included in this standard.
	INF-S3 <i>Height– Masts, antennas, lines and single pole support</i>	5m line heights in Outstanding Natural Landscapes, Outstanding Natural Features, Coastal Natural Character Areas is inadequate for the continuous safe operation of new lines in such areas – particularly in regard to ground clearances and NZECP34.

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
	<i>structures, anemometers and extreme weather devices (not regulated by the NESTF)</i>	A 12m height in these areas is requested by WELL
	INF-S8 <i>Cabinets, electric vehicle charging stations, temporary infrastructure and temporary electricity generators and self-contained power units to supply existing infrastructure, and any other infrastructure structure or building not otherwise listed, which are located within the road reserve or rail corridor</i>	A 5m ² substation area is acceptable to WELL in residential zones.
	INF-S11 <i>Earthworks – Slope, height, depth and location</i>	<p>INF-S11(a) exempts earthworks undertaken by Transpower in order to achieve NZECP34 clearances.</p> <p>WELL's distribution network (including the regionally significant subtransmission network) is also subject to NZECP34 – therefore this earthworks exemption should similarly apply to WELL.</p> <p>INF-S11 Clause 3 limits Infrastructure activities such as <i>operation, maintenance, and repair</i> within trenches deeper than 1m and within 1m of a site boundary.</p> <p>WELL may have cables installed deeper than 1m; therefore, as currently worded this provision could be interpreted as restricting the ability to effectively repair such cables without having to obtain a resource consent. In the event that the permitted activity standard excludes cables deeper than 1m WELL seeks</p>

SECTION OF PLAN	SPECIFIC PROVISION	COMMENT
		that the words “operation, maintenance, and repair” be removed from INF-S11
	INF-S12 <i>Earthworks – Area limit</i>	WELL supports the earthworks standard exemption for trenching up to 120m.
	INF-S15 <i>Removal of indigenous vegetation</i>	WELL considers that vegetation management exemption should be provided for works giving effect to the <u>Electricity (Hazards from Trees) Regulations 2003</u> .

SUBMISSION ON
HUTT CITY COUNCIL - DRAFT DISTRICT PLAN

To: Hutt City Council
By email to: district.plan@huttcity.govt.nz

Submission on: Draft District Plan

Name of Submitter: Urban Edge Planning Ltd
on behalf of The Wellington Company

Address for service: Urban Edge Planning
PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

Attention: Corinna Tessendorf
022 304 4187
Corinna@urbanedgeplanning.co.nz

- This is a submission made on behalf of The Wellington Company concerning the Draft District Plan as notified by Hutt City Council on 9 November 2023.
- The specific provision of the Draft District Plan that this submission relates to is the proposed zoning of the site at 41 Percy Cameron Street and the surrounding properties on Taita Drive and Percy Cameron Street (currently zoned as Avalon Business Activity Area) as Light Industrial Zone.
- Urban Edge Planning on behalf of The Wellington Company seeks that the site at 41 Percy Cameron Street and surrounding properties at Taita Drive and Percy Camron Street, Avalon, that are currently zoned Avalon Business Activity Area be rezoned as Mixed Use Zone.

SITE CONTEXT

This submission relates to the site at 41 Percy Cameron Street and surrounding properties along Taita Drive and Percy Cameron Street, Avalon that are currently zoned Avalon Business Activity Area.



Figure 1: Grip

The area can be described as follows:

Address	<ul style="list-style-type: none"> ▪ 41 Percy Cameron Street ▪ Wider Taita Drive / Percy Cameron Street area including <ul style="list-style-type: none"> ♦ 181, 181A, 181B, 199 Taita Drive ♦ 37, 39, 45, 1/55 to 46/55 Percy Cameron Street
Size	<ul style="list-style-type: none"> ▪ 41 Percy Cameron Street – 4668m² ▪ Wider Taita Drive / Percy Cameron Street - approximately 7ha
Title	41 Percy Cameron Street:
Parcel ID	1028422
Legal description	8319976 Lot 2 DP 569885
Location	On the corner of Taita Drive and Percy Cameron Street, former Avalon Studios
Operative DP Zoning	Avalon Business Activity Area
Operative DP Overlay	<ul style="list-style-type: none"> ▪ Flood Hazard Overlay - Inundation Area

Draft DP Zoning	Light Industrial Zone
Draft DP Overlays	<ul style="list-style-type: none"> ▪ Heritage Site – Avalon TV Studios ▪ Flood Hazard Overlay - Inundation Area ▪ Industrial Main Through Route Frontage Overlay along Percy Cameron Street ▪ Specific Height Control Overlay - 12 metres
Current Use and Development	<ul style="list-style-type: none"> ▪ 41 Percy Cameron Street <ul style="list-style-type: none"> ◆ Avalon tower – undergoing redevelopment for residential use (Avalon Apartments) ▪ Wider Taita Drive / Percy Cameron Street area including <ul style="list-style-type: none"> ◆ Avalon Film & Television Studios ◆ NZ Film Archives - TVNZ Collection, Ngā Taonga Sound & Vision ◆ Avalon Business Park – Work & Living ◆ Several commercial and industrial businesses
Surrounding Area	<p>The area is surrounded by the Te Awa Kairangi / Hutt River corridor to the north, Fraser Park to the east, residential to the south and a retirement village to the west.</p> <p>Current Zoning</p> <ul style="list-style-type: none"> ▪ River Recreation Activity Area to the north ▪ General Recreation to the east ▪ High Density Residential Activity Area to the south ▪ Medium Density Residential Activity Area to the south and west <p>Proposed Zoning</p> <ul style="list-style-type: none"> ▪ Open Space Zone to the north ▪ Sport and Active Recreation Zone to the east ▪ High Density Residential Zone to the south ▪ Medium Density Residential Zone to the south and west

PLANNING CONTEXT

Operative District Plan

Under the Operative District Plan the site at 41 Percy Cameron Street and the surrounding properties are zoned as Avalon Business Activity and are partially subject to the Flood Hazard Overlay – Flood Inundation that has recently been introduced as part of the Plan Change 56 process.

The Avalon Business Activity Area was initially introduced to cover the Avalon Television Centre on Percy Cameron Street and the National Film Unit on Fairway Drive. The intention of the zone was to provide for the unique nature of activities that existed on the sites, including film related activities, television production and broadcasts, other telecommunication activities (including those associated with satellite communications), a computer business, film processing laboratories and administrative and office functions for the above activities. It also provides for a mix of activities not necessarily associated with television and film production and broadcasting activities, but consistent with their effects. However these activities have the potential to change the character of the area and of generating effects which require consideration in terms of the amenity values of the adjoining residential and recreational areas.

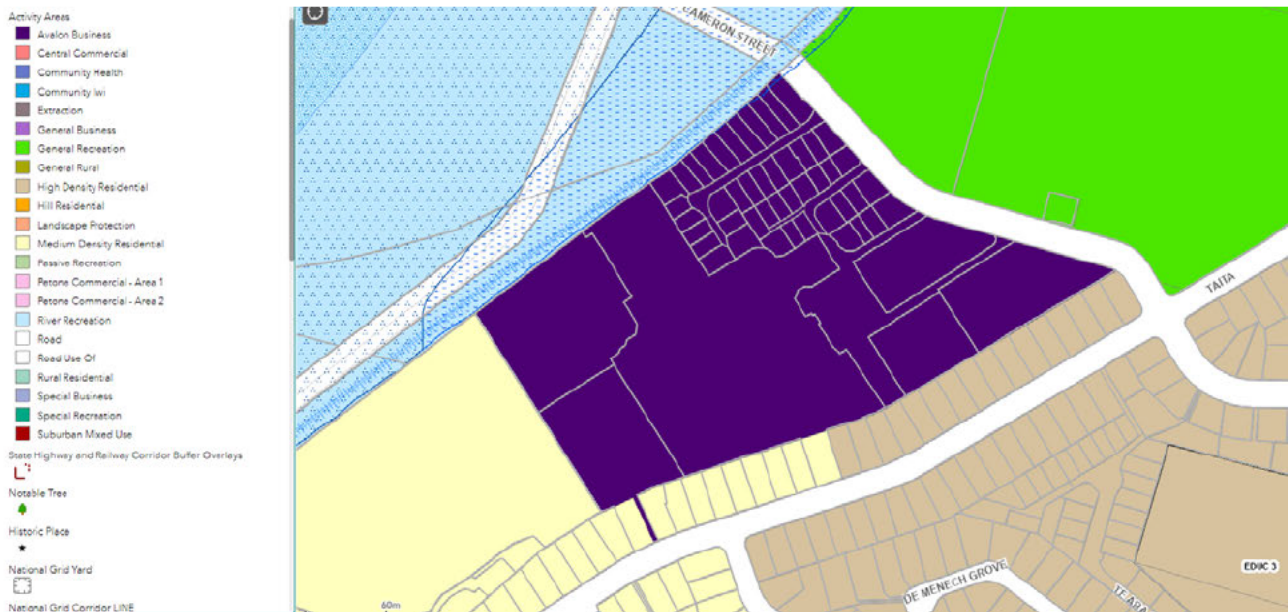


Figure 3: Avalon Business Activity Area – Operative District Plan (Source: HCC GIS Viewer)

Draft District Plan

Under the Draft District Plan the site at 41 Percy Cameron Street and the surrounding properties are proposed to be zoned as Light Industrial Zone. The following Overlays apply:

- Heritage Site – Avalon TV Studios
- Flood Hazard Overlay – Inundation Area
- Industrial Main Through Route Frontage Overlay along Percy Cameron Street
- Specific Height Control Overlay – 12 metres

The site is also subject to the Mana Whenua Statutory Acknowledgement overlay but no other overlays or precincts apply.

The proposed Light Industrial Zone is described as covering smaller and more fragmented industrial areas that often have smaller lot sizes than the General or Heavy Industrial Zone. It recognises the need for industrial areas to be sometimes located close to residential Areas and also provides for commercial activities that are unsuitable for commercial areas. The Light Industrial Zone provides for some residential activities where there are co-location benefits, but in general purely residential developments should be avoided to preserve development capacity for industrial activities in the long term.



Figure 3: 41 Percy Cameron Street and surrounding Light Industrial Zone – Draft District Plan (Source: HCC GIS Viewer)

Current Use and Development

The area currently accommodates a range of commercial, light industrial and residential activities located in a variety of buildings ranging from small commercial/residential units to the 10-storey Avalon Tower that is currently being converted into apartments.

Site History

The two main buildings in the area are the 10-storey tower and single-storey warehouse-style building were constructed in the late 1960s and early 1970s. The Avalon Tower was officially opened in 1975.

When the complex was first built it was New Zealand's principal centre for television broadcasting and administration.

TV NZ gradually moved shows and administration to Auckland and the site was eventually sold in 2013.

The National Film Unit was purpose built in the late 1970's for the then state-supported film industry. It consisted of a three storey office block, with studios, laboratories, workshops, associated film facilities areas and a cinema complex.

SUBMISSION

Submission

This submission opposes the proposed zoning of the site at 41 Percy Cameron Street and the surrounding properties as Light Industrial Zone as proposed by the Draft District Plan and instead requests the zoning as Mixed Use Zone.

The current zoning as Avalon Business Activity Area under the Operative District Plan reflects the previous use of the site as TV and Film Studios and provides specifically for related activities. Since

the initial zoning was introduced the actual use of the site has changed significantly – TV NZ moved all studios and shows to Auckland in 2013 and the sites and buildings have been sold.

While the large warehouse style building is currently occupied by Avalon Film & Television Studios, the Avalon Tower is currently undergoing redevelopment for residential use and is marketed as Avalon Apartments.

The north-eastern corner of the area has recently been developed to contain a business park which provides for commercial and light industrial activities combined with residential activities.

The Light Industrial Zone as proposed by the Draft District Plan mainly provides for light industrial activities and research activities as well as those commercial activities that are generally incompatible with other commercial centres. It does not allow for residential activities unless they are ancillary to industrial activities or are occupy less than 50% of a building.

The already consented residential use of the Avalon tower would therefore not be supported by the proposed policy and rule framework of the Light Industrial Zone. It is also considered that the Light Industrial Zone would unduly limit the redevelopment options for a significantly large area.

The Mixed Use Zone as proposed by the Draft District Plan is considered to be a much better match for the previous Avalon Business Area. It would better align with the consented and partially realised residential redevelopment intentions for the Avalon Tower while also providing greater flexibility for the existing and future use and development of the wider area.

Furthermore the area is directly abutting residential properties to the south and west and the Mixed Use Zone is considered to provide better options for transitional activities and to manage adverse effects along the zone boundary.

The requested Mixed Use Zone would reflect the wide range of existing and consented activities (including commercial, residential and light industrial) and allow for the ongoing transition of the area over time. It would fit well with the diverse environment the site is located within.

All of the above seems to align well with the intentions of the Mixed Use Zone as outlined in the Introduction:

The Mixed Use Zone covers a large variety of different areas across the urban area of Lower Hutt that call for flexible land use controls. Common scenarios include:

- *The fringes of commercial centres, to provide for expansion and contraction of those centres,*
- *Very small commercial centres,*
- *Some areas that have a long history of mixed uses,*
- *Sites with unique businesses or facilities,*
- *Areas that form a spatial transition between two other areas,*
- *Areas that are transitioning in time from one role to another,*
- *Areas with strong potential to develop into centres, and*
- *Corridors connecting other centres with good access to public transport that have the potential to serve the surrounding area.*

Of the listed scenarios above the 'Areas that are transitioning in time from one role to another' seems to be particularly relevant.

We also consider the proposed objectives of the Mixed Use Zone to be supportive of the requested rezoning.

Objective 1 of the proposed Mixed Use Zone describes the purpose of the zone as follows:

Mixed Use areas provide flexibility for any combination of commercial, community, light manufacturing and servicing, recreational, residential, and other compatible activities, while reflecting the Mixed Use Zone's role and function in relation to the hierarchy of centres.

Objective 2 of the proposed Mixed Use Zone describes the character and amenity of the zone as follows:

The built character of Mixed Use areas reflects the diversity of activities that take place in the zone and recognises that these areas are generally in transition spatially between other areas, or in transition over time. Main through routes assist the city's identity and character.

Objective 3 outlines the role of the Mixed Use Zone in accommodating growth as follows:

Mixed Use areas play a significant role in accommodating growth and have sufficient serviced, resilient development capacity to meet commercial and residential growth needs, especially the needs of activities that benefit from a mixed use environment. ...

Overall it is considered that applying the Mixed Use Zone to the site at 41 Percy Cameron Street and the surrounding properties would provide additional flexibility for the use and development of an area that is currently going through a transition from purely commercial and light industrial activities to a mixed use environment with a significant residential component. A Mixed Use Zone would facilitate a range of land uses, including those that could support the surrounding high and medium density residential environment, contributing to a well-functioning urban environment. The Mixed Use Zone would also be better aligned with the residential zone to the south and west.

Conclusion

Urban Edge Planning on behalf of The Wellington Company seek the zoning of the site at 41 Percy Cameron Street and the surrounding properties currently included in the Avalon Business Area as Mixed Use Zone.

The Mixed Use Zone would recognise the current and consented range of activities and provide additional flexibility and allow for the short, medium and long term use and development of the area. It would also be better suited to provide for an appropriate interface with the residential properties to the south and west.



Corinna Tessendorf
Urban Edge Planning Ltd

On behalf of:
The Wellington Company

02 February 2024



Saritha Shetty

From: Corinna Tessendorf <Corinna@urbanedgeplanning.co.nz>
Sent: Friday, 2 February 2024 4:17 pm
To: District Plan Review Team
Cc: James Beban
Subject: [EXTERNAL] Submission on HCC Draft District Plan - 41 Percy Cameron Street
Attachments: HCC DDP - 41 Percy Cameron Street, Avalon - Submission .pdf

Categories: Steve

Kia ora,

Please find attached a submission on the Draft District Plan by Urban Edge Planning on behalf of The Wellington Company.
Please feel free to contact me with any queries.

Kind Regards,

Corinna Tessendorf
Principal Policy Planner
022 304 4187
corinna@uep.co.nz



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PO Box 39071, Wellington Mail Centre, Lower Hutt 5045

Saritha Shetty

From: Alana Wouters <alana.wouters@russellmcveagh.com>
Sent: Friday, 15 December 2023 3:17 pm
To: District Plan Review Team
Cc: Simon Pilkinton; Alice Gilbert
Subject: [EXTERNAL] Submission on City of Lower Hutt Draft District Plan
Attachments: Submission on City of Lower Hutt Draft District Plan.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Good afternoon

On behalf of Waste Management NZ Limited, please see **attached** for filing the submission on the City of Lower Hutt Draft District Plan Review.

It would be appreciated if you could please confirm receipt by way of return email.

Kind regards
Alana

Alana Wouters
Solicitor

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SUBMISSION ON THE CITY OF LOWER HUTT DRAFT DISTRICT PLAN REVIEW

TO: Hutt City Council ("**Council**")

SUBMITTER: Waste Management NZ Limited ("**Waste Management**")

SUBMISSION ON: City of Lower Hutt draft District Plan ("**draft District Plan**")

Introduction

1. Waste Management welcomes the opportunity to provide feedback on the draft District Plan.
2. Waste Management is New Zealand's largest waste and environmental services company, with a long history in New Zealand dating back to 1935. The company is the market leader in the waste sector in New Zealand with an established national network of vertically integrated local waste and environmental management service.
3. Waste Management owns or has operational interests in several landfills, refuse transfer stations and material recovery facilities and other waste services throughout New Zealand. Waste Management also undertakes municipal waste collection in several locations.
4. Waste Management has a variety of interests in Hutt City including a hazardous waste facility at 57 – 59 Port Road, a transfer station at 27 Seaview Road and a proposed resource recovery park at 30 Benmore Crescent, Manor Park.
 - (a) **Port Road:** Waste Management operates a hazardous waste facility at this site. These operations include heavy metal waste processing, contaminated soil stockpiling and medical waste container washing.
 - (b) **Seaview Road:** Waste Management operates a transfer station at this site. This facility undergoes recycling operations, and collects general domestic, green and commercial solid waste.
 - (c) **Benmore Crescent:** Waste Management has lodged a land use consent application with the Council to establish and operate a resource recovery park on part of 30 Benmore Crescent, Manor Park. The proposed resource recovery park will include material recovery, construction and demolition waste sorting and transfer, a repair cafe for the repair of goods, second hand goods store and a general refuse transfer station.
5. Waste Management relies on robust planning provisions to protect and enable the regionally significant essential infrastructure that it develops and operates. Waste Management is strongly committed to ensuring our projects and operations contribute to positive outcomes for New Zealand's environment and communities.

Benmore Crescent

6. Waste Management supports the re-zoning of 30 Benmore Crescent, Manor Park to the General Industrial zone and seeks that this zone remains in any notified version of the District Plan.
7. Finding a suitable site for a resource recovery park has proven difficult for Waste Management. It has taken some 20 years to identify the Benmore Crescent site. This difficulty stems from the shortage of larger sized pieces of land that are located in proximity to infrastructure, have suitable ground contours, and are viable for industrial activities.
8. The Benmore Crescent site is suitable for to industrial zoning, and subsequently industrial development for the following reasons:
 - (a) It is highly accessible to State Highway 2. Accessibility directly influences the productivity of a range of industrial activities.
 - (b) There is a minimal risk of reserve sensitivity effects arising from the development. Industrial activities are generally not sensitive to effects from the railway line or State Highway, both of which are in proximity to the Benmore Crescent site. The industrial zoning manages potential reverse sensitivity effects on these regionally significant pieces of infrastructure.
 - (c) The site is flat and has suitable dimensions to allow for industrial activity.
 - (d) The site is able to be utilised despite being dissected by the Wellington Faultline. A relatively large portion of the site cannot be built on for this reason. Industrial activities are able to use the area outside the earthquake Faultline no-build line for buildings and the area within the Faultline area for yard-based activities. As such, the change to industrial zoning allows the site to be used more efficiently.
 - (e) Effects of flooding from Awa Kairangi can be managed. As a result of the recent consents, the ground level of the site is to be raised above the 1 in 440 year probability-modelled flood plain. Flooding risk is further mitigated by the non-habitable nature of industrial activities.
 - (f) The site is surrounded by other urban uses, open space zoning, transport routes (railway / State Highway 2) and is able to mitigate / avoid any effects from its location in proximity to a residential zone.
 - (g) Industrial zoning is an efficient and effective land use to achieve the objectives and policies of the District Plan. The earthquake Faultline and location adjacent to Hutt River means the site it is likely not viable for residential development. The use of the site for productive rural activity is also limited due to the land size and the urban uses surrounding the site. Further, the site is currently zoned Rural despite being isolated and physically separated from other rural or rural residential-zoned land.

- (h) Amenity effects to the Hutt River Trail, adjacent to the site, can be managed through edge planting. The trail already passes by several industrial sites and part is adjacent to State Highway 2. The development of this site will not change the overall Hutt River Trail experience.

Port Road and Seaview Road

9. Waste Management supports the Heavy Industrial Zone proposed at its Port Road and Seaview Road sites and seeks that this zone remains in any notified version of the District Plan.
10. Waste Management considers provisions applying in this zone should appropriately accommodate heavy industry, and any ancillary activities. These provisions should recognise that while industrial activities seek to internalise effects as much as possible, they can from time-to-time result in discharges beyond site boundaries. While Waste Management seeks to internalise all of its effects, this cannot be guaranteed. The District Plan needs to recognise this.

Draft District Plan provisions

11. Waste Management makes the following comments on the draft provisions concerning:
- (a) mandatory notification;
 - (b) definitions under the District Plan;
 - (c) non-industrial activities within the industrial zone; and
 - (d) residential provisions.

Mandatory notification

12. The draft District Plan states that applications for some activities, including sensitive activities which are ancillary to an industrial activity (Rule GIZ-R20), and integrated retail activities (Rule GIZ-R21) require public notification.
13. There may be situations where mandatory notification would not be effective or add value to the decision making process, such as for isolated sites where effects are limited to the immediately surrounding sites. In this circumstance, limited notification would be more appropriate.
14. Waste Management suggests these provisions should be amended to state (with amendments shown in red):

public notification is required for any application under this rule, **unless the applicant can demonstrate exceptional circumstances that mean notification will not provide any benefit to the decision maker and that effects are no more than minor.**

Definitions

15. Waste Management supports the current definition of "industrial activity"¹ as it generally captures waste management facilities.
16. Waste Management seeks for the definition of "heavy industrial activity" to be amended to remove subjectivity caused by its current reference to offensive or objectionable noise, dust, or odour.
17. "Offensive odour" is defined as occurring when an odour can be detected and is determined to be offensive by one or more observers; including at least one Hutt City Council enforcement officer. Rule GIZ-R24 outlines that activities resulting in odour or fumes are permitted activities where there is no offensive odour or fume nuisance beyond the boundaries of the site. If compliance is not achieved, the odour / fumes will be a non-complying activity. There are no definitions of "offensive / objectionable noise" or "offensive / objectionable dust".
18. Activities are generally defined at the time they are established, rather than when resource consent is applied for. The definition of offensive odour cannot be applied prior to the operation of an activity, as it is uncertain whether observers would consider a particular odour "offensive". This definition of offensive odour is therefore difficult to apply at the time of a resource consent application. Waste Management seeks that the use of the word offensive odour is clarified to remove subjectivity and make it clear whether or not an activity will come within it, or for this definition to be deleted. There are already appropriate provisions and standards proposed in the draft District Plan which cover the risk of noise, dust, or odour. For example, most activities likely to generate odour and dust are captured in the definition of offensive trade that forms part of heavy industrial activity.
19. The definition of "infrastructure" has the same meaning as in section 2 of the RMA. This definition does not recognise waste infrastructure. Waste Management seeks an amendment to this definition to explicitly include the waste infrastructure network. Safely managing waste is an essential service and is critical to protecting the health of communities and the environment. It is also a fundamental part of enabling crucial construction (including housing development) and industrial activities. The definition of infrastructure in the District Plan must capture both core waste infrastructure assets and activities, and any ancillary activities critical to the functioning of this infrastructure. Given the limited definition of infrastructure under the RMA, district or regional resource recovery or waste disposal facilities were specifically recognised in the definition of "infrastructure" in the Natural and Built Environment Act 2023.

Non-industrial activities in Industrial Zones

20. Waste Management seeks that the District Plan recognise that in limited circumstances ancillary retail and cafes may be appropriate in an industrial zone. For example, some modern resource recovery parks include a second hand goods store. It is logical for second hand stores to be located within the resource recovery

¹ Which "means an activity that manufactures, fabricates, processes, packages, distributes, repairs, stores, or disposes of materials (including raw, processed, or partly processed materials) or goods. It includes any ancillary activity to the industrial activity."

park to efficiently minimise waste and limit the transportation of recovered second hand goods.

21. In regard to cafes; repair cafes have been emerging as a part of resource recovery parks, where people can bring goods to be repaired and utilise the cafe at the same time. In addition, a café / food retailer onsite is able to cater to the number of people employed by industrial activities in the area. These repair cafes should be distinguished from stand-alone retail or cafes that are not related to the main activity. That said, very limited stand-alone food and beverage may be appropriate in the Industrial Zone, where those zones are not in proximity to Commercial Zones.

Residential provisions

22. Waste Management suggests that the management of waste may be a useful matter of discretion for multi-unit developments provided for in residential zones. Matters of discretion could include an assessment of whether the development will be able to provide waste services. Factors that will be relevant is whether there is sufficient space on the berm for rubbish and recycling bins to be collected, and whether sufficient space has been made for truck access.

Conclusions

23. Waste Management is open to engaging further with the Council on matters raised in this submission if that would assist the Council. If there is an opportunity to speak to the submission, Waste Management would be willing to do so.

Name: **Jim Jefferis**
Head of Environment and Consents

Date: 15 December 2023

Address for Service: C/O Jim Jefferis
Waste Management NZ Ltd
Private Bag 14919
Panmure
Auckland 1741

Email: jjefferis@wastemanagement.co.nz

From: [Nathan Geard](#)
To: [District Plan Review Team](#)
Subject: FW: [EXTERNAL] Wainuiomata Rural Community Association Submission Draft District Plan
Date: Monday, 18 December 2023 9:12:27 am
Attachments: [IMG1HCCLogo-Colour-EmailSignatureV5 .png.png](#)
[ATT00001.png](#)
[WRCAI DDP Submission.pdf](#)

Nathan Geard
Policy Planning Manager

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



From: Judy Randall <Judy.Randall@huttcity.govt.nz>
Sent: Monday, December 18, 2023 8:59 AM
To: Nathan Geard <Nathan.Geard@huttcity.govt.nz>; Stephen Davis <Stephen.Davis@huttcity.govt.nz>
Subject: Fw: [EXTERNAL] Wainuiomata Rural Community Association Submission Draft District Plan

Kia ora Nathan and Stephen

A submission is attached - in case it didn't get to you.

Ngā mihi
Judy

Judy Randall
Democracy Advisor

Hutt City Council, 30 Laings Road, Hutt Central, Lower Hutt, Lower Hutt 5010
P: 04 5706956 **M:** **W:** www.huttcity.govt.nz



From: DemocraticServicesTeam <DemocraticServicesTeam@huttcity.govt.nz>

Sent: Sunday, December 17, 2023 12:24 PM

To: Judy Randall <Judy.Randall@huttcity.govt.nz>

Subject: FW: [EXTERNAL] Wainuiomata Rural Community Association Submission Draft District Plan

From: Wainui Rural <wainuiomata.rural@gmail.com>

Sent: Friday, December 15, 2023 8:41 AM

To: Brady Dyer <Brady.Dyer@huttcity.govt.nz>; DemocraticServicesTeam <DemocraticServicesTeam@huttcity.govt.nz>; Biodiversity <biodiversity@huttcity.govt.nz>; chris.bishop@parliament.govt.nz; Glenda Barratt <Glenda.Barratt@huttcity.govt.nz>; Josh Briggs <Josh.Briggs@huttcity.govt.nz>; Keri Brown <Keri.Brown@huttcity.govt.nz>; Simon Edwards <Simon.Edwards@huttcity.govt.nz>; Tui Lewis <Tui.Lewis@huttcity.govt.nz>; Andy Mitchell <Andy.Mitchell@huttcity.govt.nz>; Chris Parkin <Chris.Parkin@huttcity.govt.nz>; Karen Morgan <Karen.Morgan@huttcity.govt.nz>; Naomi Shaw <Naomi.Shaw@huttcity.govt.nz>; Tony Stallinger <Tony.Stallinger@huttcity.govt.nz>; Gabriel Tupou <Gabriel.Tupou@huttcity.govt.nz>; Richard Te One <Richard.TeOne@huttcity.govt.nz>; Jo Miller <Jo.Miller@huttcity.govt.nz>

Subject: [EXTERNAL] Wainuiomata Rural Community Association Submission Draft District Plan

Wainuiomata Rural Community Association Incorporated

Submission on Hutt City Council Draft District Plan

Craig Innes (Chairman)
15 December 2023

Summary

In December 2023 the Wainuiomata Rural Community Association Incorporated [the Association] surveyed its members to see if the membership wanted the association to make a submission on behalf of members.

The association wishes to make the following submission:

1. Proposed Rural Lifestyle Zone, minimum lot size one hectare. The association objects to the minimum lot size being reduced to one hectare for the Proposed Rural Lifestyle Zone.
2. Proposed Rural Lifestyle Zone, end of Moores Valley. The association objects to the application of the Rural Lifestyle Zone to the large parcels at the end of Moores Valley Road.
3. Highly Productive Land overlay. The association objects to the Highly Productive Land overlay being applied.
4. Outstanding Natural Features and Outstanding Natural Landscape overlays. The association objects to the Outstanding Natural Features and Outstanding Natural Landscapes being applied.

The Association wishes to provide a verbal submission in addition to this written submission.

Wainuiomata North

There are particular circumstances surrounding the Wainuiomata North area. The association may reconsider its position regarding zone changes in light of the views of the landowners within the Wainuiomata North area.

1 Proposed Rural Lifestyle Zone, minimum lot size 1 hectare

The association objects to the minimum lot size being reduced to 1 hectare for the Proposed Rural Lifestyle Zone.

The Association objects to the proposal on the following grounds:

- a) Allowing subdivisions to be as small as one hectare may affect the rural production activities in the General Rural zone.
- b) Allowing subdivisions to be as small as one hectare undermines the rural character of the affected areas. A one hectare minimum poses risks of air, sound and light pollution.
- c) Allowing subdivisions to be reduced to one hectare puts too much pressure on the roads, particularly Moores Valley Road.
- d) A one hectare minimum is too small to ensure that neighbouring properties are not affected by the septic tank. It also increases the risk to the waterway, particularly Wainuiomata-iti Stream (aka Wainuiomata Stream).

1(a). Allowing subdivisions to be as small as one hectare may affect the rural production activities in the General Rural zone.

Under the National Planning Standards, Rural Lifestyle Zone is required to allow primary production to occur in the other rural zones:

Rural lifestyle zone

Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.

The Association is concerned that allowing subdivision down to one hectare has the potential to interfere with rural production activities within the district. Rural production activities may involve the use of heavy vehicles in particular. A relatively high density of housing in neighbouring Rural Lifestyle zones increases the risk that inappropriate restrictions may be imposed on rural production activities. This is a particular concern for forestry operations.

1(b). Allowing subdivisions to be as small as one hectare undermines the rural character of the affected areas.

Greatly increasing the housing density within the Rural Lifestyle Zone brings with it the risk that inappropriate restrictions are imposed. For instance, the Association has learned that some residents have been told that they face the same restrictions as urban residents for the keeping of poultry.

Maintaining the rural character of the area requires a limitation on section size. A large increase in housing will create light and sound pollution. It may also lead to restrictions on rural fireplaces.

1(c). Allowing subdivisions to be reduced to one hectare puts too much pressure on the roads, particularly Moores Valley Road.

Moores Valley Road is long, narrow and winding. There is already a high usage of the road. Allowing a large intensification of housing up Moores Valley will put strain on an already strained road.

Any increase in housing density needs to take into account the safety of pedestrians and animals on the roads.

Any increase in housing density needs to take into account the road use needs of any rural production activities.

1(d). A one hectare minimum is too small to ensure that neighbouring properties are not affected by the septic tank. It also increases the risk to the waterway, particularly Wainuiomata-iti Stream (aka Wainuiomata Stream).

In the 2014 Urban Growth Strategy, the Hutt City Council indicated an intention to investigate the issues surrounding the use of septic tanks in Moores Valley and Coast Road. The Association is not aware of the outcome of any investigation.

If there is a large increase in river pollution that results from the intensification, the Association is concerned that an attempt may be made to force through the provision of sewerage services. The existing houses in Moores Valley were not constructed with the consideration of a possible future need to connect to sewerage services. Landowners who have investigated the issue have reported that retrospectively connecting to sewerage services would be extremely expensive.

2. Proposed Rural Lifestyle Zone, end of Moores Valley. The association object to the application of the Rural Lifestyle Zone to the large parcels at the end of Moores Valley Road.

Unlike the other parts of rural Wainuiomata, the Rural Lifestyle Zone is proposed for large unoccupied properties at the end of Moores Valley Road. These properties are owned by Goh Realty, a real estate company.

The application of the Rural Lifestyle Zone, whether the minimum lot size is one hectare or two hectares, has the potential to result in a large increase in intensification of the end of Moores Valley. Being located at the end of the valley, this will have a large effect on the traffic and upon the stream.

The application of Rural Lifestyle Zone to the end of Moores Valley contrasts with the application of the General Rural Zone over the subdivided and occupied sections on Crowther Road. It appears to be at odds with the underlying intention of the National Policy Statement on Highly Productive Land and the National Planning Standards. The Hutt City Council should not be intensifying rural zoned areas in lieu of proper residential development. This will only increase the difficulty of future greenfield development. It has the potential to increase carbon emissions and is out of character with the general trends in government policy.

3. Highly Productive Land overlay. The association objects to the Highly Productive Land overlay being applied.

The HCC has identified highly productive land and proposes to place restrictions on changes of use and construction/extension of buildings on this land. Much of Coast Road and some of Moores Valley has been classified as highly productive land in the HCC draft District Plan. According to the National Policy Statement for Highly Productive Land, this overlay is supposed to be defined by the Greater Wellington Regional Council, not Hutt City Council. Its application for the Wainuiomata area is in contrast to the historical experience of the area.

We submit that HCC is proposing changes to the District Plan which appear to go further than what the National Policy Statement requires and, in fact, is contrary to the intention of the statement. In particular, the Draft District Plan would ban the construction, alteration of all new buildings on highly productive land. For affected landowners, this would mean the construction of sheds, processing areas etc. would be prohibited. This appears to go beyond what the National Policy Statement for Highly Productive land provides for, which is:

The use of highly productive land for land-based primary production to be prioritised and supported (Policy 4)

It states that a use or development of highly productive land is appropriate where the following applies to the use or development, and the measures in subclause (3) are applied (Implementation 39.2):

(a) it provides for supporting activities on the land:

Supporting activities, in relation to highly productive land, is defined in the National Policy Statement as meaning those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing)

The purpose of the National Policy Statement for Highly Productive land is to support the productive use of land. The proposed rules associated with the Draft District Plan use the classification to impose restrictions upon the use of the land that interfere with production activities.

The application of the Highly Productive Land overlay in the Wainuiomata North area is inconsistent with the application of the overlay in other areas. In other parts of the rural parts of Wainuiomata, the overlay is only being applied to the General Rural zone. This is not the case in Wainuiomata North. Unlike other rural parts of the district, the Wainuiomata North area has been associated with a relatively long standing intention to develop for housing. The application of the Highly Productive Land overlay is not appropriate for Wainuiomata North.

The application of the Highly Productive Land overlay for the Coast Road and parts of Moores Valley is inappropriate as the source dataset is very old and too coarse for the use that it is being applied. The ultimate source for the classification is the Land Use Capability data. This data ultimately dates to the 1970s and is not fit for purpose for the classification of the land in Wainuiomata. The data is not supposed to be used at scales of less than 1:50,000. The small slivers of land being shown in parts of the district are artefacts of an assessment that has been undertaken at an inappropriate scale and which has no relation to the underlying realities of the land concerned.

We note that GWRC has not provided up to date maps or an RPS that is more recent than 2013. We seek this to be further discussed with affected landowners and for the proposed District Plan to not be any more restrictive than required by the NPS on Highly Productive Land. This mapping should be done at the Regional Council level, in conjunction with landowners and in such a manner as to meaningfully reflect the realities on the ground. Applying this overlay should take into account the flooding events and any building restrictions that prevent full economic use of the land.

4. Outstanding Natural Features and Outstanding Natural Landscape overlays. The association objects to the Outstanding Natural Features and Outstanding Natural Landscapes being applied.

The Association view is that these overlays are not appropriate. The application of the Outstanding Natural Features overlay over private land in the southern part of Wainuiomata is over land that is not visible to the built up areas. The overlay has been applied to some areas that are currently in productive use.

The application of the Outstanding Natural Landscape and Outstanding Natural Features overlays over private land is in contrast to the failure to impose these overlays over the spectacular bush covered hills above the north eastern harbour and over the western hills. Both of these areas are publicly owned and parts of regional parks and are visible to the built up areas. The level of protection of these areas should be prioritised.

This mapping should be done in conjunction with landowners and in such a manner as to meaningfully reflect the realities on the ground.

The recent coalition agreements send a strong message about Significant Natural Areas. Applying the Outstanding Natural Landscape and Outstanding Natural Features overlays over private land appears to conflict with recent changes in policy direction from the government.

Concluding remarks

Communication from the Hutt City Council on the proposed Draft District Plan has been extremely poor. A number of people have been in contact with the Association expressing confusion about the letters sent by the Council. The Council sent the letters out without identifying the properties affected by the proposed changes. Owners of multiple properties were left confused about which property the letter was supposed to relate to. Further to this, the Council did not send out maps and it was therefore not clear what proportion of each property was affected.

From: phil.barry9@icloud.com
To: [District Plan Review Team](#)
Cc: [Brady Dyer](#); ["Shayne Hodge"](#); ["Fiann Blackham"](#); [Farhan Norzal](#); [Neil McGrath](#); [Neil Kemp](#)
Subject: [EXTERNAL] Submission on Draft Plan
Date: Friday, 15 December 2023 8:50:20 am
Attachments: [VHG Submission on Additional Heritage Listings in the Draft District Plan 231215.pdf](#)

Dear sir/madam

Please find attached a submission from the Voluntary Heritage Group on the draft District Plan. We would like the opportunity to meet with you to discuss the Draft Plan.

Please don't hesitate to contact me if you have any questions on our submission or if you would like any further information on the matters raised in our submission.

Kind regards/ Ngā mihi

Philip Barry

Convenor, Hutt Voluntary Heritage Group | phil.barry9@icloud.com | 021 478 426



Councillor Brady Dyer
Chair
District Plan Review Committee
Hutt Council

By email: district.plan@huttcity.govt.nz

15 December 2023

SUBMISSION ON ADDITIONAL HERITAGE LISTINGS IN THE DRAFT DISTRICT PLAN

This is a submission from the Hutt Voluntary Heritage Group (VHG) expressing our concerns and recommendations regarding the proposed changes outlined in the Draft District Plan.

The VHG consists of Hutt residents committed to supporting the heritage designation of private property by the Council only when the property owner has given their expressed written consent. Heritage designation imposes numerous constraints and burdens on the property owner, and it is only right that the property owner's consent should be obtained before any such designation applies.

Given the process the Council went through recently with Plan Change 56 and the decision of the Independent Panel to overturn the Council's proposal to create six new heritage areas we are very disappointed to see the Draft District Plan proposes adding another 115 additional properties, along with two new heritage areas in the Hutt Valley region.

Heritage listing imposes significant ongoing costs and problems for property owners (refer Annex One). Evidence we have previously provided the Council shows insurers will charge increased premiums (e.g., 25% or more), impose higher excesses, and may refuse to provide cover for the additional costs in repairing heritage-designated properties (refer Annex Two). Research indicates that heritage listing reduces the value of a property by 10 to 30 percent, with potential buyers losing interest when they learn that a property is heritage-listed.¹

The empirical evidence of reduced values for heritage zoned properties is reinforced by anecdotal evidence provided by real-estate agents who have reported that many potential buyers lose interest when they learn that a property is heritage listed. This reflects the lack of development prospects, as heritage rules mean the owner cannot make many changes to their house. It is also because heritage properties require considerable and regular maintenance and will be subject to strict rules which can act as a deterrent for potential buyers once they factor in cost and time.

Considering these potentially imposed costs and the loss in value, we wish to bring to your attention the absence of a provision for adequate compensation for heritage-designated property owners. The Council has allocated a mere \$1.5 million over 10 years (2021 to 2031) to assist owners with preservation costs. This amount falls far short of covering the additional expenses and value losses

¹ <https://www.sciencedirect.com/science/article/abs/pii/S0264837719317016> and <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1540-6229.2010.00293.x>

associated with heritage designations for the 115 additional properties. We strongly believe that homeowners should not bear the financial burden of heritage designation without due consideration and fair compensation.

The Hutt City Council already maintains a substantial list of heritage properties relative to other councils, satisfying the requirements of the Resource Management Act (refer Annex Three). Further there are many ways other than compulsory heritage designation of meeting the requirements of the RMA. Establishing signs, keeping virtual memories, allowing voluntary heritage designation for private properties and the Council designating public properties as heritage are all steps the Council can take that contribute to meeting its heritage obligations under the RMA.

We request that the Council carefully considers our key messages during the review of the Draft District Plan. Our aim is to strike a balance between heritage preservation and respecting the rights and financial well-being of property owners.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P Barry', with a long horizontal flourish extending to the right.

Philip Barry
Convenor
Hutt Voluntary Heritage Group

Tel: 021 478 26

Email: phil.barry@tdb.co.nz

<https://voluntaryheritage.wordpress.com/>

<https://www.facebook.com/voluntaryheritage>

Annex One



The Costs of Heritage Listing

A Council heritage designation imposes substantial costs on the home-owner.

These costs include:

- 10% to 30% reduction in the value of the home.
- Substantial ongoing costs and problems for property owners.
- Insurers charge increased premiums (25% or more), increased excesses and refuse to provide cover for the additional costs in repairing heritage homes.
- Significant restrictions on what a home-owner can and can't do with their property. Once a property is heritage-listed, the owner has to get the Council's special consent to:
 - make any changes to the exterior of their home
 - change a window frame
 - take a chimney down to remove any risks from earthquakes
 - add a solar panel to help mitigate climate change
 - any other meaningful modifications to their home
- Seeking Council approval to modify a heritage-designated property is costly, grossly time consuming and success is by no means guaranteed.
- Not being able to develop or intensify their property in the way that their neighbours are able to.

Currently the Council can decide unilaterally to list someone's home as a heritage property, whether the home-owner wants it or not.

The Voluntary Heritage Group wants the Council to adopt the following policy:

"That a property should only be added to the District Plan as heritage-designated with the express written consent of the property owner."

Annex 2: Impact on insurance premiums

From: Debbie Hutton <debbie@albanyins.co.nz>

Sent: Friday, 21 May 2021 7:50 am

Subject: Heritage designation

Morning [REDACTED]

I've now had 3 responses from our 3 domestic insurers as follows;

Ando

Each property is taken on a case by case basis & would largely depend on what the class 2 designation entails. Please advise what the implications are on the client as part of the class 2 designation regard to the property, it's appearance etc?

NZI

There are commonly three types of classification they may be given if Heritage/Council NZ designated – list can be found [Search the List | Heritage New Zealand](#):

- HNZ or council designated Category 1 & 2 – for places of special or outstanding historical or cultural significance or value
 - We require a satisfactory builders report and also a valuation taking into account the cost to re-build to council spec.
 - If accepted, higher excess will be imposed and minimum 25% loading
- Historic Area/precinct – groups of related historic places such as a geographical area with several properties or sites, or a cultural landscape. Emphasis is on the significance of the area in Wellington.
 - We require a satisfactory builders report and also recommend a valuation taking into account the cost to re-build to council spec.
 - If accepted, higher excess will be imposed and minimum 25% loading
- Council Character Area
 - If within the Wellington region and meets pre-1935 criteria then;
 - o Satisfactory builders report and valuation required.
 - If within the Wellington region and does not meet pre-1935 criteria then declined.
 - Anywhere else in NZ requires referral to us and provided it is a normally acceptable risk, the character area would generally not play into our underwriting decision.

Vero

In regards to the heritage Question If the home is pre 45 rewired, Re-gibbed and Heritage it would be rated as such no increase in the premiums but the following terms would apply

"Where the home is registered with the New Zealand Historic Places Trust, we will not pay for any additional costs or fees required to comply with any heritage covenant(s) that apply to the property"

So, 3 different responses. Although Ando still need to know exactly what heritage status it would fall under in order to confirm their underwriting stance, which is the one you particularly are trying to place your property with Vero, as they don't like insuring much in the Wellington region.

I trust that this assists you. If you can provide more information, I can approach Ando again for you.

Please note, effective 15 March 2021 our Disclosure & Regulatory requirements have changed. To view our Disclosure Statements, Terms of Business and other Regulation Documents please follow this link;

[Disclosure & Regulation Documents \(albanyins.co.nz\)](#)

Best regards,



DEBBIE HUTTON
DIRECTOR

Phone: 09 415 8211 | Email: debbie@albanyins.co.nz | www.albanyins.co.nz
222 Dairy Flat Highway, Albany Village, North Shore | PO Box 205, Albany 0752

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New Zealand District Councils' Heritage Policies

Website: <https://voluntaryheritage.wordpress.com/>

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Contact

Philip Barry

Convenor

Hutt Voluntary Heritage Group

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Disclaimer

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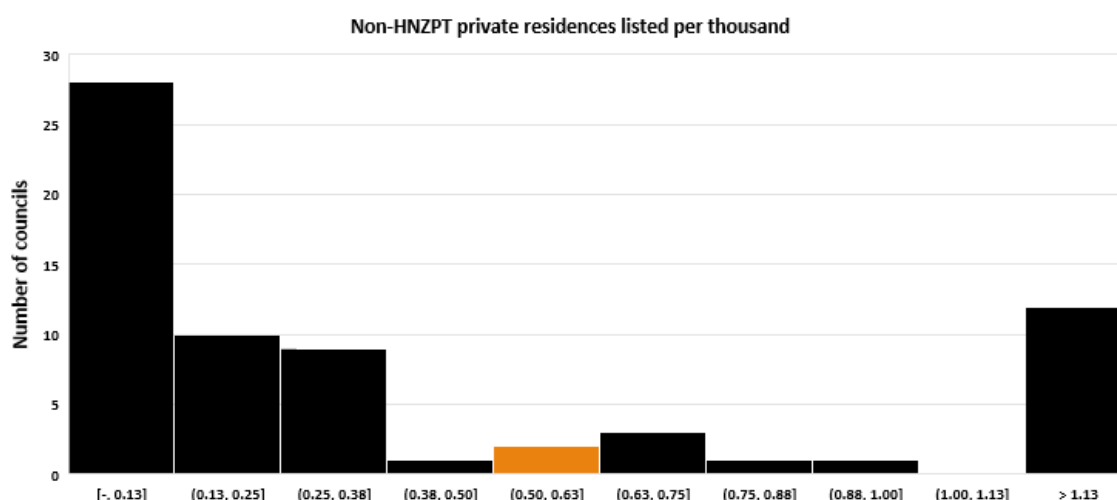
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Executive summary

- Total number of territorial authorities examined: 67 (all New Zealand district councils)
- Number of territorial authorities who responded to information requests: 59
- Number that do not list any properties other than Heritage New Zealand Pouhere Taonga (HNZPT) designated properties: 10
- Number that list additional properties, but do not list additional private residential properties: 9
- Confirmed to require owner consent: 5 (Hastings, Hurunui, Ruapehu, Waimate, Waitaki)
- Number that list additional private residential properties, but changes to them are permitted (with notice given to the council): approx. 5+

The chart below shows the frequency of non-HNZPT heritage-listed private residences per thousand people for each district council in New Zealand. The orange column indicates where Hutt City Council is positioned relative to the other councils. The graph below excludes heritage areas and precincts.



Hutt City Council is in the top third of councils for the number of non-HNZPT heritage-listed private residences per thousand people. The average for the district councils is 0.43 private residences listed per thousand people while Hutt City Council currently lists 0.54 private residences per thousand people. Appendix 1 presents the information on an individual council basis.

Rules surrounding heritage sites depend on how councils categorise the sites and the extent of the works proposed. Repairs and maintenance as well as internal alterations are typically permitted activities which do not require resource consents. Exterior alterations, additions or construction or new structures and demolition can be discretionary, restricted discretionary or even non-complying depending on the site's perceived significance to local heritage.

Smaller councils do not typically list residential buildings and many are unsure about whether they would need owner consent to list residential properties in the district plan.

Introduction

This report provides the results of research conducted into the heritage policies and practices of district councils in New Zealand. The research examines the policies and practices of all 67 district councils in relation to Heritage New Zealand Pouhere Taonga (HNZPT) and non-HNZPT heritage listed sites with a particular focus on non-HNZPT heritage-listed private residential properties. The numbers in this report do not include historic heritage areas and precincts.

The issues that have been explored for each district council are:

- How many heritage sites does the council list in its Plan in addition to those identified by HNZPT?
- How many heritage sites identified above (ie, not listed by Heritage New Zealand Pouhere Taonga) are private residences (houses)?
- Does listing of a heritage site by the council require the agreement of the landowner?
- Are there any specific rules for owners of private residences listed as a heritage site in regards to controlled or permitted activities?

This document was developed using council responses to LGOIMA requests. Of the 67 councils 59 responded to LGOIMA requests. Those councils that did not respond had information sourced directly from their respective district plans.

By conducting this research we will be able to determine how the heritage practices of Hutt City Council compare with other councils in New Zealand. We will update the analysis once the full extent of Hutt City's proposed new heritage listings is known. We will also identify potential fallback options for Hutt City Council to consider should the council deny landowners the right to not have their property listed as a heritage site.

Council breakdown

Ashburton

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
39	94	10
<i>Is owner consent required?</i>		
It would be expected that the landowners of prospective sites would be contacted and engaged with, however a listing could be pursued even if not supported by the landowner if there was strong enough justification for this.		
<i>Residential properties rules when listed by district authority</i>		
Rules relating to heritage sites are contained in Table 12-3 of the Heritage Chapter of the District Plan, there is no differentiation between private residences and other types of building or site.		

Auckland

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
532 (plus 8 Heritage Areas)	1,968 (plus 7 Heritage Areas)	Unsure
<i>Is owner consent required?</i>		
No, landowners do not have rights of veto.		
<i>Residential properties rules when listed by district authority</i>		
Yes, these are contained in the AUP Chapter D17 – Historic Heritage Overlay and Part 7 of the HGIDP.		

Buller

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
42	270	7
<i>Is owner consent required?</i>		
Landowners would be consulted. Any plan changes/amendments are undertaken by the West Coast Regional Council.		
<i>Residential properties rules when listed by district authority</i>		
No changes of use or subdivision of any historic/cultural item(s) listed in Part 14, which would adversely affect the heritage resource or detract from the values the item(s) are listed for will be allowed. No destruction of any historic/cultural item listed in Part 14.		

Carterton

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
16	47	1
<i>Is owner consent required?</i>		
The district plan consultation process is when heritage sites are listed or removed. This is a public process and owners can object or support. The council can proceed without the owner's consent.		
<i>Residential properties rules when listed by district authority</i>		
Interior maintenance is permitted so long as the owner uses original materials and does not detract from the character of the premises. Incentives to encourage landowners to protect historic heritage, such as rates relief and assistance with applications for protective covenants.		

Central Hawkes Bay

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
76	16	4
<i>Is owner consent required?</i>		
The Operative Plan is at least 20 years old. The rules in the Proposed District Plan around Historic Heritage sites have immediate legal effect from notification. Incentives are available to landowners but while consent is preferred it is not required. All resource consent applications relating solely to safety alterations for heritage sites will be processed free of charge to encourage the preservation of heritage sites in the District.		
<i>Residential properties rules when listed by district authority</i>		
Permitted, with notice given to the council for consent process.		

Central Otago

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
107	168	81
<i>Is owner consent required?</i>		
Yes that has been the practice		
<i>Residential properties rules when listed by district authority</i>		
Discretionary. The policy framework in the District Plan provides for a fee waiver for the processing of any resource consent required in relation to these rules.		

Chatham Islands

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
10	Unsure	Unsure
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Unsure		

Christchurch

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
345	344	126
<i>Is owner consent required?</i>		
Assessed against the criteria for scheduling in section 9.3.2.2.1 of Christchurch district plan and will generally only be proposed for scheduling with the support of the current owner.		
<i>Residential properties rules when listed by district authority</i>		
Heritage dwellings are subject to the same planning rules as other scheduled heritage sites. There are a number of activities which are permitted for heritage sites and heritage settings subject to meeting standards and other activities have a Controlled, Restricted Discretionary, Discretionary or Non-Complying activity status.		

Clutha

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
63	22	6
<i>Is owner consent required?</i>		
The District Plan does not address this matter specifically. However, to be included in the District Plan would require a plan change, and it would be appropriate to consult with the landowners affected as part of the plan change process.		
<i>Residential properties rules when listed by district authority</i>		
<p>Rule HER.1 of the District Plan sets rules around Registered Heritage Buildings (as defined by the District Plan):</p> <ul style="list-style-type: none"> ▪ Redecoration or restoration is a permitted activity subject to criteria (Rule HER.1(i)); ▪ Any alterations for additions will first be considered a restricted discretionary activity and would likely be non-notified (Rule HER.1(ii)); ▪ Works to modify, destroy or detract from the character of a registered heritage building or structure is a discretionary activity and would likely be publicly notified including serving notice to Heritage New Zealand (Rule HER.1(iii)). 		

Dunedin

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
376	418	241
<i>Is owner consent required?</i>		
<p>The protection of historic heritage is a matter of national significance under the RMA and the DCC are required to protect it in accordance with its standing in the RMA and also any higher order documents (for example the Regional Policy Statement Chapter HCV-HH which also has policies which direct how heritage needs to be assessed and protected). The decision whether or not something meets the criteria for being scheduled is based on a heritage assessment, prepared by a suitably qualified expert. However, like all other District Plan matters under the RMA, landowners have the right to make submissions and be heard with respect to any plan changes that may affect their property and they may choose to seek an alternative heritage assessment to support their case. However, there are no other different mechanisms to object to scheduling and changes to plan provisions (including scheduling) do not need the “agreement” of the landowner.</p>		
<i>Residential properties rules when listed by district authority</i>		
<ul style="list-style-type: none"> - ‘Repairs and maintenance’ can be undertaken without consent provided any replacement materials are ‘like for like’. Restoration is also permitted. - Development activities such as subdivision and new development require Resource Consent and an assessment on the effect to existing heritage values is undertaken. - Modifications to elements of the building identified for ‘Protection Required’ (listed in the schedule entry) are not permitted without Resource Consent. An assessment is made on the effect to existing heritage values. - Demolition of a scheduled heritage building is identified as non-complying in most zones and requires Resource Consent. An assessment is made on the effect to existing heritage values and considers the viability of alternative options. 		

Far North

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
370	35	Unsure
<i>Is owner consent required?</i>		
<p>S12.5.4.15 – The council will ensure that, before seeking to include within the Plan any heritage resource that occurs on private land, consultation will be undertaken with the landowner affected.</p>		
<i>Residential properties rules when listed by district authority</i>		
Unsure		

Gisborne

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
261	120	34
<i>Is owner consent required?</i>		
<p>While landowner agreement is desirable, during the formal public consultation process, landowner agreement is not required.</p>		
<i>Residential properties rules when listed by district authority</i>		
<p>The rules for residential zones are under section DD1 of the Tairāwhiti Resource Management Plan, with specific rules under DD1.6.1 for the Residential Protection Zone.</p>		

Gore

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
6	24	0
<i>Is owner consent required?</i>		
For heritage buildings to be listed in the District Plan, they go through the RMA process for plan making. Under the RMA there is a requirement to protect historic heritage, and that legislation leads the process whereby sites get listed, as opposed to community selection or landowner agreement. That said landowners are a key stakeholder in the process that Council would engage with, and plan changes are public processes the community can engage in.		
<i>Residential properties rules when listed by district authority</i>		
It is a permitted activity to carry out any work on any scheduled heritage structure that is for the sole purpose of restoration, repair or maintenance. Such works shall be undertaken using the same type of material to that originally used, and must retain the original design, form and texture of the feature under repair. Exterior alterations or demolition is discretionary.		

Grey

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
34	1	0
<i>Is owner consent required?</i>		
Unsure. Old Plan initiated in 2005 and no new entries considered since then.		
<i>Residential properties rules when listed by district authority</i>		
No specific rules for private residences. Exterior alterations or demolition is discretionary.		

Hamilton

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
43	80	24
<i>Is owner consent required?</i>		
No, but to be scheduled – the identified sites are subject to a First Schedule process under the Resource Management Act 1991.		
<i>Residential properties rules when listed by district authority</i>		
Yes, refer to Chapter 19 of the Hamilton City Operative District Plan.		

Hastings

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
88	28	17

Is owner consent required?

Yes. HRP4 – Encourage the use of non-regulatory incentives and assistance to facilitate the restoration and conservation of recognised heritage sites.

Residential properties rules when listed by district authority

Discretionary. Demolition non-compliant

Hauraki

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
30	198	56

Is owner consent required?

As part of the Draft District Plan process letters were sent to the owners of all sites proposed to be listed in the District Plan (whether already in the previous DP or newly proposed ones). They then had the opportunity to provide comment, which was considered by the District Plan Committee, and used to help formulate the Proposed District Plan. Landowners then had the opportunity to make a submission on the Proposed District Plan. We have not received any suggestions for the listing of additional sites since the DP became operative. Should we receive such a suggestion we would consult with the landowner before taking any action to include their site in the District Plan.

Residential properties rules when listed by district authority

Varies by category. Discretionary for Nationally or Regionally significant sites, permitted for locally significant.

Note that Category C sites are listed in the District Plan only for information purposes – as being sites of local or neighbourhood significance. There are no protection or conservation rules applying, except that a photographic record be provided to Council prior to demolition or removal of listed buildings or structures. Category C has 118 sites listed of which 29 are private residences.

Horowhenua

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
46	17	6

Is owner consent required?

When Council last amended Schedule 2 of the District Plan in 2017/18, it made the decision to only list buildings/sites where the landowner was supportive. If Council was to choose to list buildings/sites in the future and the landowner was not supportive, then the plan change process is a public process and the landowner would have the opportunity to submit in opposition to their property being listed.

Residential properties rules when listed by district authority

Maintenance and repair permitted activities. Earthquake strengthening is controlled activity and requires resource consent.

Hurunui

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
54	55	3

Is owner consent required?

If someone or a group etc. were to propose the inclusion of a building as a new heritage feature via a private plan change application, Council wouldn't accept the private plan change without the landowner approval. This is because the listing of a heritage building may become onerous and costly for the landowner in the future.

Residential properties rules when listed by district authority

Discretionary

Hutt City

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
55	59	31

Is owner consent required?

No

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Invercargill

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
83	97 (plus 2 historic areas)	0

Is owner consent required?

Yes, Council would typically require the agreement of the landowner in order to add their property to Council's heritage record.

Residential properties rules when listed by district authority

HH – R2: Repair and maintenance to preserve the integrity of historical buildings and structures is a permitted activity provided that such work is undertaken using the same type of materials to that originally used, and must retain the original design, form and texture of the feature under repair.

Kaikoura

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
10	25	4

Is owner consent required?

This would be a decision based on heritage values and would need to be decided by RMA process which are subject to appeal to both Environment Court and High Court.

Residential properties rules when listed by district authority

Discretionary. Heritage rules are outlined in Chapter 15 of the District Plan no specific rule relate to private residences, the rule however will capture private residences.

Kaipara

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
79	26	15
<i>Is owner consent required?</i>		
Unsure. Private property rights considered. Nearly all properties listed are privately owned.		
<i>Residential properties rules when listed by district authority</i>		
Permitted if not demolishing whole or most of property. Discretionary otherwise		

Kapiti Coast

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
35	74	6
<i>Is owner consent required?</i>		
No mention of landowner consent		
<i>Residential properties rules when listed by district authority</i>		
Unsure		

Kawerau

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
0	0	0
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Discretionary		

Mackenzie

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
31	55	10
<i>Is owner consent required?</i>		
Unsure		

Residential properties rules when listed by district authority

Preservation is encouraged but not mandated. Demolition or removal is a permitted activity after notice and photos are given to counsel. Alteration is a controlled activity

Manawatu**HNZPT listed**

45

Non-HPTNZ listed

Unsure

Residential Non-HPTNZ listed

25

Is owner consent required?

Unsure

Residential properties rules when listed by district authority

Permitted (appears to suggest that even heritage NZ listings can be demolished) after giving resource consent and photographs taken

Marlborough**HNZPT listed**

101

Non-HPTNZ listed

44

Residential Non-HPTNZ listed

20

Is owner consent required?

Not necessarily. The criteria for inclusion in the PMEP is contained in Policy 10.1.4 of volume 1 of the PMEP. These do not include the views of the landowner.

Residential properties rules when listed by district authority

No different to other types of property or sites. Found in volume 2, chapter 2, rules 2.24-2.27. There are permitted, controlled, discretionary and prohibited activities that apply. Differs depending on whether Class A or B heritage sites.

Masterton**HNZPT listed**

31

Non-HPTNZ listed

185

Residential Non-HPTNZ listed

39

Is owner consent required?

Yes, the Council would prefer the approval and agreement of the landowner if the site/building is to be protected. The list of Historic Heritage sites outlined in the operative District Plan went through a public notification process and during that process only two sites were not included as the owners opposed its listing and status.

Residential properties rules when listed by district authority

Most of the permitted and controlled activities are in regard to "minor repairs and maintenance of any heritage item". There are standards that outlined the extent of the work that can be undertaken and to seek Council advice before commencing any works.

Matamata-Piako

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
49	43	10
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Interior – permitted, new construction or demolition – discretionary		

Napier

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
92	80	0
<i>Is owner consent required?</i>		
The process for protecting heritage sites/items in the District Plan is through the District Plan Review or Plan Change process. This process requires notification to the public and consultation with those affected by the proposed change, however, landowner approval is not required in order to change the District Plan to include that item in its heritage schedule. It must be proven, however, that the item/site is of sufficient heritage value (as assessed by a suitably qualified professional) to justify protection.		
<i>Residential properties rules when listed by district authority</i>		
The rules for owners of private residences that have been identified as historic heritage sites are the same as those for all historic heritage sites. If an activity is deemed permitted by the District Plan, then the owner can undertake that activity, in accordance with the District Plan, without having to engage with Council. If an activity is a Controlled Activity, then resource consent is required. There are no Controlled Activities for historic heritage sites in the Operative District Plan. Activities are either classed as Permitted, Restricted Discretionary, or Discretionary Activities. Heritage sites in the Operative District Plan are divided into two groups – Group 1 and Group 2. The activities that be carried out are determined by the group number a heritage item is in.		

Nelson

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
155	221	124
<i>Is owner consent required?</i>		
Regulatory protection under the Resource Management Act 1991 (RMA), is provided through the NRMP. The NRMP determines how items listed in the plan should be managed and whether a consent is required for any modifications to the building and/or site where the listed building is located. If a site is not listed in the NRMP, it could be nominated to be added onto the NRMP's heritage schedule. A nomination can be put forth by any member of the public. While there is a system to assess nominations and add items to the schedule, this process would usually involve some sort of consultation with the landowner. The RMA does not require the agreement of the owner.		
<i>Residential properties rules when listed by district authority</i>		
Provisions detailing how heritage buildings are dealt with are found within the individual zone rule tables of the NRMP. The NRMP classifies heritage items into three categories which are A, B and C. Most of the rules relating to heritage items are related to either the alteration or demolition of an		

identified heritage item. The NRMP also encompasses rules that regulate the erection of new buildings within the site of a listed heritage item.

New Plymouth

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
89	80	4
<i>Is owner consent required?</i>		
Unnecessary if category B or C heritage site. Generally Council consults with landowners prior to any formal proposal to include sites in the district plan and we require their agreement.		
<i>Residential properties rules when listed by district authority</i>		
Only category A buildings, sites and areas are subject to heritage related rules in the New Plymouth District Plan. Category B's and C's are not regulated.		

Opotiki

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
25	0	0
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Discretionary		

Otorohanga

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
25	0	0
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Palmerston North

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
48	46	19
<i>Is owner consent required?</i>		
Unsure		

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Porirua**HNZPT listed**

56

Non-HPTNZ listed

37

Residential Non-HPTNZ listed

13

Is owner consent required?

The Council does not require the agreement of the landowner in order for a heritage site to be protected (scheduled) in the PDP. The Council must however follow the relevant process under the First Schedule of the Resource Management Act 1991 when proposing a change to the district plan, including adding new heritage sites. This process includes a requirement for consultation with landowners.

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Queenstown Lakes**HNZPT listed**

100

Non-HPTNZ listed

210

Residential Non-HPTNZ listed

67

Is owner consent required?

No; however, it is preferable.

Residential properties rules when listed by district authority

Yes, specific rules can be found in Chapter 26 of our Proposed District Plan. Consent would be required to demolish or undertake alterations. The threshold for consenting changes depending if the site is a Category 1 or 2 site.

Rangitikei**HNZPT listed**

63

Non-HPTNZ listed

0

Residential Non-HPTNZ listed

0

Is owner consent required?

To update Schedule 3CA of the District Plan, we are required to go through a publicly notified plan change, or review process. The next review of the District Plan is scheduled to begin late 2022/2023. When we review the Heritage Section of the District Plan we will need to consider whether we implement the same approach as we currently have – mirroring the Heritage NZ List, or whether there are other sites which should be protected under the District Plan that are not listed by Heritage NZ.

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Rotorua

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
21	38	7
<i>Is owner consent required?</i>		
Historic Structures are identified when the District Plan is reviewed which typically is once every 10 years. Where a site is identified as a heritage building the land owner must be notified and they have the ability to submit and appeal the scheduling of the site. In practise there would normally be significant consultation with a land owner prior to this occurring. There is however no requirement for the land owner to give their agreement.		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Ruapehu

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
34	82	7
<i>Is owner consent required?</i>		
“Any nomination of a heritage item that is or is part of any private property must have the support of the owner(s), either as being the nominator or a supporting signatory”.... “If the owner's support is not included in the nomination a reason for this must be provided and council will consult with the owner before public comment is invited or the nomination is assessed.”		
<i>Residential properties rules when listed by district authority</i>		
Identified for information only, not subject to rules		

Selwyn

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
32	44	Unsure
<i>Is owner consent required?</i>		
It is preferable but this is not an absolute requirement for scheduling. During the review process for the Selwyn District Plan, where a property owner objected to a recommendation for inclusion in the schedule by our heritage consultant, these were then peer reviewed to determine if their inclusion was appropriate. Furthermore, through the submissions process on the Proposed Selwyn District Plan, a property owner (or any member of the public) could submit in support or opposition to the proposed heritage schedule.		
<i>Residential properties rules when listed by district authority</i>		
Scheduled heritage items are subject to rules in the District Plan that restrict the degree of change to the item itself and to the setting. In terms of permitted activities, maintenance and repair of the item can be undertaken where the repair and maintenance do not alter the form, appearance and profile of the external fabric of the item. Cleaning (but not abrasive blasting) and repainting are also permitted. Where the work does alter the outward form, appearance and profile of item it ceases to be repair and maintenance and becomes an alteration which is a restricted discretionary activity. Seismic strengthening also requires a resource consent but as a controlled activity. In terms of the setting, new minor structures, repairs/replacement of paved areas and earthworks that do not permanently alter the shape of the land are permitted although larger scale changes are likely to require a resource consent as a restricted discretionary activity.		

South Taranaki

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
67	28	5
<i>Is owner consent required?</i>		
The South Taranaki District Council consults with the landowner prior to placing heritage sites on the heritage schedule of the District Plan.		
<i>Residential properties rules when listed by district authority</i>		
Discretionary		

South Waikato

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
26	Unsure	Unsure
<i>Is owner consent required?</i>		
No		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

South Wairarapa

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
52	129	16
<i>Is owner consent required?</i>		
No. Inclusion in the plan is based around objective heritage assessment and process under the RMA.		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Southland

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
45	9	5
<i>Is owner consent required?</i>		
Unsure. Consultation		
<i>Residential properties rules when listed by district authority</i>		
Alteration – discretionary. Demolition – non-compliant		

Stratford

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
12	17	1
<i>Is owner consent required?</i>		
The inclusion of a newly identified site in the District Plan would need to follow the prescribed process for changes to District Plans. While it's not a requirement, it is desirable to have a supportive landowner.		
<i>Residential properties rules when listed by district authority</i>		
Discretionary. The rules for heritage buildings are the same irrespective of them being residential or not.		

Tararua

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
53	0	0
<i>Is owner consent required?</i>		
No		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Tasman

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
128	25	9
<i>Is owner consent required?</i>		
Unaware of any such buildings been added recently; the policy provisions do not require land owner consent. Most buildings have been rolled over from the old district schemes and where identified a long time ago.		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Taupo

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
5	0	0
<i>Is owner consent required?</i>		
Anyone can propose a plan change to include a historic heritage site in the district plan or through the district plan review. Technically you don't need to have the landowners agreement to do this. However as the Council would need to consult with the landowner and the landowner has the opportunity to submit to this change to the district plan, it is uncertain whether such an inclusion would occur without the landowner's agreement.		

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Tauranga**HNZPT listed**

31

Non-HPTNZ listed

19

Residential Non-HPTNZ listed

0

Is owner consent required?

In most cases, we will consult those affected before notifying a plan change. The level of consultation required will depend on the nature of the plan change. We will produce a plan change document that includes an explanation of the proposed changes and a section 32 report. This report considers the appropriateness of the plan change and assesses the costs and benefits of the environmental, economic, social, and cultural effects anticipated from the plan change.

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Thames-Coromandel**HNZPT listed**

184

Non-HPTNZ listed

Unsure

Residential Non-HPTNZ listed

10

Is owner consent required?

The Proposed District Plan does not have a policy to require agreement from the owner of a heritage building for the building to be listed in the Historic Heritage Schedule.

In the review of the District Plan between 2013-2016, there were some submissions lodged by owners of properties who opposed the inclusion of particular buildings in the Historic Heritage Schedule. Council did approve the Historic Heritage Schedule without some of these buildings, notwithstanding the heritage consultant's professional opinion that the buildings should be in the Schedule. Examples of buildings deleted from the Schedule as a result of property owners' objections included the Kopu Station Hotel and the Sinclair bach at Wyuna Bay.

Residential properties rules when listed by district authority

Discretionary

Timaru**HNZPT listed**

129

Non-HPTNZ listed

0

Residential Non-HPTNZ listed

0

Is owner consent required?

Unsure

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Upper Hutt

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
18	9	0
<i>Is owner consent required?</i>		
In respect of protection under the District Plan, landowner agreement is not required to propose to include a new item for protection under the District Plan. If the heritage item/site is deemed significant under s.6(f) of the Act, then it does not require the agreement of the landowner to list it in the district plan. The proviso is there would need to be evidence prepared by a suitably qualified and experienced person to support the heritage listing, not just that it was 'identified by the local community'.		
<i>Residential properties rules when listed by district authority</i>		
•Chapter HH – Historical Heritage – of the District Plan sets out the policy and rule framework with respect to heritage sites. The chapter is attached and the rules copied below.		
HH-R1 – Any repair or maintenance to the exterior of a significant heritage feature listed in Schedule (HH-SCHED1) – Permitted.		
HH-R2 – Any alterations or additions to any significant heritage feature listed in Schedule (HH-SCHED1), other than the partial or total demolition, destruction or removal of any such heritage feature. Council may impose conditions over design and appearance of the additions or alterations – Controlled.		
HH-R3 – The partial or total demolition, destruction or removal of any heritage feature listed in Schedule (HH-SCHED1) – Discretionary.		

Waikato

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
59	94	31
<i>Is owner consent required?</i>		
No		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Waimakariri

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
80	26	1
<i>Is owner consent required?</i>		
Section 6 of the Resource Management Act 1991 (RMA) identifies the protection of heritage values from inappropriate subdivision, use, and development as a matter of national importance. Accordingly, a Heritage Consultant reviewed all existing and nominated heritage items in the Waimakariri District and confirmed those scheduled in the Proposed District Plan as worthy of being listed. In mid-2020, the Council advised owners of identified historic heritage items, via a letter, of its intention of scheduling the items in the Proposed District Plan. The letter informed owners that:		
<ul style="list-style-type: none"> the items had been assessed and deemed worthy of inclusion. the intention was to provide a greater level of protection to the item. 		

- the Proposed District Plan would be notified in mid-2021 for public submissions, and that the submissions and hearings process would be used to confirm the proposed heritage schedule in order to meet the Council's obligations under the RMA.
- contact information was also provided if owners wished to gain further information or raise concerns or objections. Council did have a hearing that resulted in some historic heritage items being removed from the schedule.

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Waimate

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
25	124	11
<i>Is owner consent required?</i>		
Yes it is the practice that the landowner agrees to the heritage sites identified.		
<i>Residential properties rules when listed by district authority</i>		
Demolition or removal – Permitted activity with written consent and photos. Alteration – controlled activity.		

Waipa

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
74	167	6
<i>Is owner consent required?</i>		
None currently. Any sites listed in the District Plan must follow a public consultation and submission process. There is no statutory obligation under the Resource Management Act to obtain prior landowner agreement, but best practice is to consult with directly affected landowners prior to publicly notifying the listing of their sites, for public submissions.		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Wairoa

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
31	36	17
<i>Is owner consent required?</i>		
If there are any sites identified by community on private land, it will have to go through a hearing process to make it official. The landowner will be consulted and be heard before the decision is made, just like a resource consent process.		
<i>Residential properties rules when listed by district authority</i>		
Discretionary		

Waitaki

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
189	49	6
<i>Is owner consent required?</i>		
As part of the current review of the district plan, landowner agreement is required for nominated Category B sites but is not required for Category A sites.		
<i>Residential properties rules when listed by district authority</i>		
The rules for owners of private residences identified as historic heritage sites are contained in Chapter 11 of the District Plan. As such there are no specific rules, but the general provisions do allow for a range of activities without resource consent.		

Waitomo

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
20	2	0
<i>Is owner consent required?</i>		
No		
<i>Residential properties rules when listed by district authority</i>		
Discretionary		

Wellington

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
351	246	59
<i>Is owner consent required?</i>		
All places that are to be listed in the District Plan (whether nominated by the community or not) must be shown to have significant historic heritage value. This is determined through an in-depth assessment of heritage values by heritage experts, against Council's criteria for listing. This assessment is provided to land owners for comment and consideration. Owner agreement to the heritage listing of a place is not required. It is a factor that is considered when a recommendation for listing is made by Council officers.		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Western Bay of Plenty

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
107	57	3
<i>Is owner consent required?</i>		
It wouldn't require the landowner's permission, but they would have a say. To add a new built heritage feature to the District Plan, it would require a Plan Change. Before notifying any such Plan Change, the landowner would need to be consulted with, and if a Plan Change was to be notified, the landowner would be entitled to make a submission. A decision would then be made by Council and the landowner would be entitled to appeal this decision to the Environment Court.		

Residential properties rules when listed by district authority

Interior alterations – permitted, exterior – restricted discretionary

Westland

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
36	0	0
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Not specified		

Whakatane

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
96	0	0
<i>Is owner consent required?</i>		
Unsure		
<i>Residential properties rules when listed by district authority</i>		
Not specified		

Whanganui

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
85	243	101
<i>Is owner consent required?</i>		
<p>A heritage covenant under the HNZPT Act is a voluntary agreement between the landowner and HNZPT.</p> <p>The process of including site in a heritage schedule in a District Plan does not, strictly speaking, require the agreement of the landowner. As with any District Plan process under the Resource Management Act 1991 (RMA), the process is a public one and the landowner, and the rest of the community, have a right to have their views heard by the Council before any decisions are made.</p>		
<i>Residential properties rules when listed by district authority</i>		
Interior alterations – permitted, exterior – restricted discretionary		

Whangarei

<i>HNZPT listed</i>	<i>Non-HPTNZ listed</i>	<i>Residential Non-HPTNZ listed</i>
87	36	26

Is owner consent required?

During the plan change process, anyone can request that an item or building be listed as a scheduled heritage item or building in the Whangarei District Plan (with required evidence of why it should be scheduled). However, there is opportunity for others (including the landowners) to oppose this and put forward their case of why it shouldn't be listed.

Residential properties rules when listed by district authority

Guidelines for owners of heritage properties on repair, maintenance and painting (including appropriate colour schemes) of scheduled built heritage sites. External alterations – restricted discretionary.

Conclusions

This research finds Hutt City Council to have the following positions relative to other councils:

- 12th highest of all 67 councils in terms of number of non-HNZPT private residences heritage-listed sites;
- 18th highest of all 67 councils in number of non-HNZPT private residences heritage-listed per thousand people; and
- 7th highest among district councils in % of locally significant heritage listed sites that are private residences.

24 councils either do not list any non-HNZPT private residences or only do so with the consent of the owner.

The following councils explicitly require landowner consent before listing non-HNZPT heritage sites; Hastings, Hurunui, Ruapehu, Waimate and Waitaki. In response to the LGOIMA request Hurunui Council responded that the reason for landowner consent was “... *because the listing of a heritage building may become onerous and costly for the landowner in the future.*”

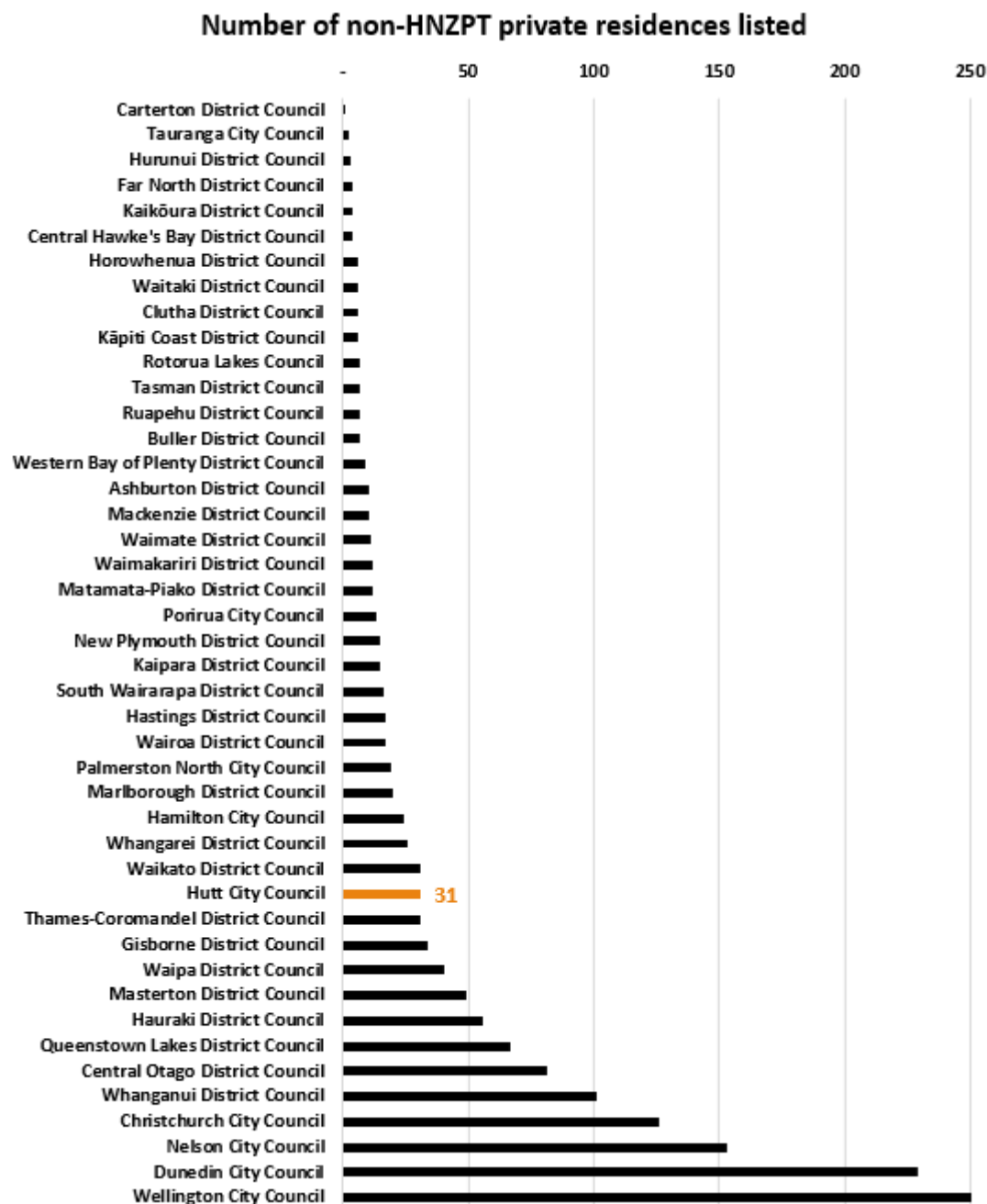
A few councils categorise non-HNZPT heritage sites listed in the district plan based on the significance of their heritage value to the local community or entire district:

- New Plymouth Council only subjects category A buildings, sites and areas to heritage related while category B's and C's are not regulated;
- Waitaki Council, under its current review of the district plan, requires landowner agreement for nominated category B sites but not for category A sites.

Rules surrounding heritage listed properties do not differ significantly between district councils as they are largely all derived indirectly from the Resource Management Act:

- Permitted activities do not require a resource consent – for heritage sites the activities classified as permitted include repairs and maintenance and interior alterations.
- The four activities that require the landowner to go through the resource consent process are controlled, discretionary, restricted discretionary and non-complying:
 - exterior alterations or construction of new structures that may impact on the visual sighting of the heritage site from the road can be either be controlled, discretionary or non-discretionary depending on the significance of the heritage site and extent of works required; and
 - demolition of the heritage site will typically be non-complying although can be restricted discretionary for certain councils should the heritage site have low significance to the district.

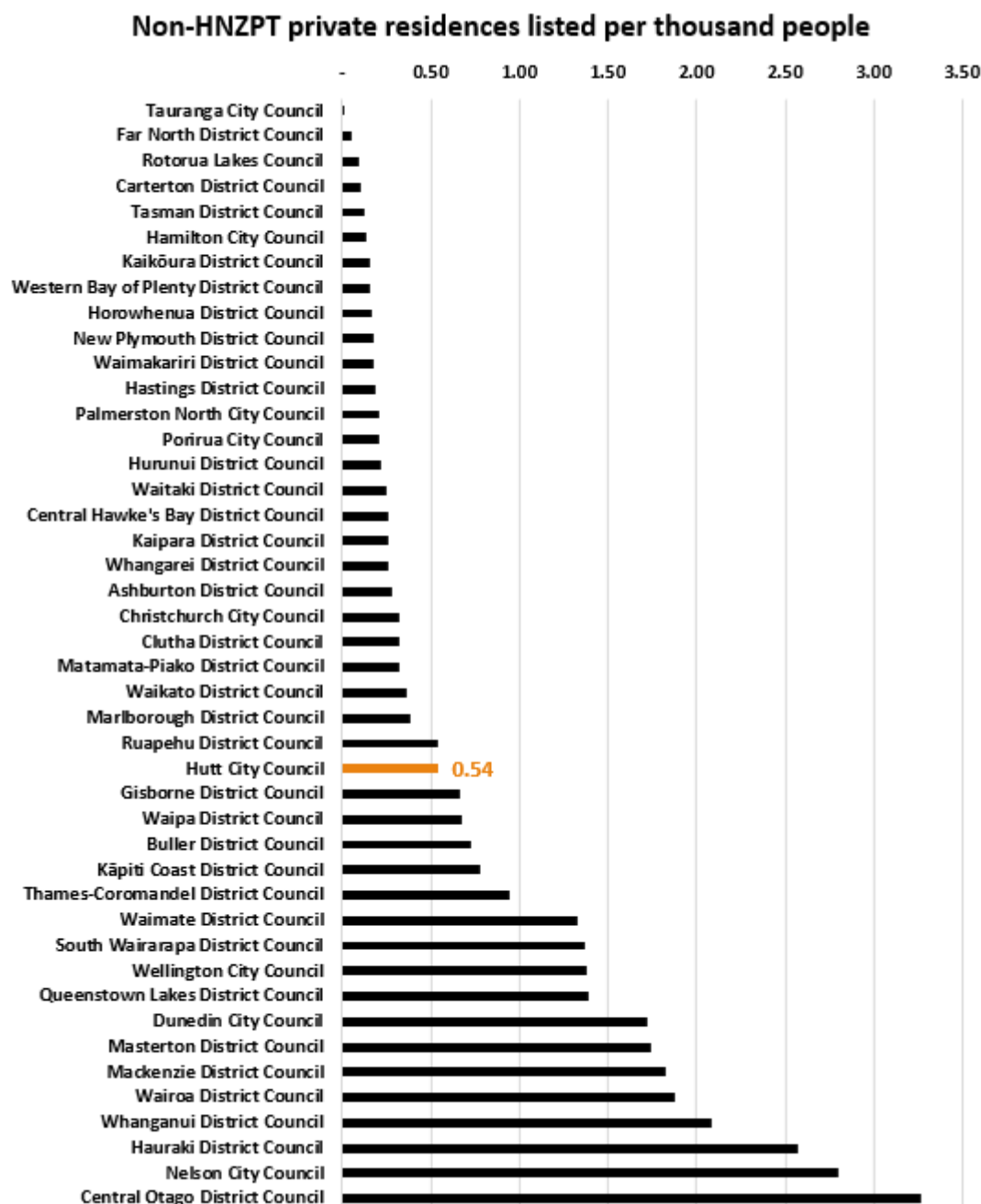
Appendix 1: Number of private residences listed



Zero private residences listed

Chatham Islands Council	Rangitikei District Council	Waitomo District Council
Gore District Council	South Waikato District Council	Westland District Council
Grey District Council	Southland District Council	Whakatāne District Council
Invercargill City Council	Stratford District Council	
Kawerau District Council	Taranua District Council	
Napier City Council	Taupō District Council	
Ōpōtiki District Council	Timaru District Council	
Ōtorohanga District Council	Upper Hutt City Council	

Appendix 2: Private residences listed per thousand people



Zero private residences listed

Chatham Islands Council	Rangitikei District Council	Waitomo District Council
Gore District Council	South Waikato District Council	Westland District Council
Grey District Council	Southland District Council	Whakatāne District Council
Invercargill City Council	Stratford District Council	
Kawerau District Council	Tararua District Council	
Napier City Council	Taupō District Council	
Ōpōtiki District Council	Timaru District Council	
Ōtorohanga District Council	Upper Hutt City Council	

Saritha Shetty

From: [REDACTED]
Sent: Wednesday, 15 November 2023 11:10 pm
To: District Plan Team
Subject: [EXTERNAL] Draft District Plan - Highly Productive Land Overlay

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Hello

Thank you for your letter dated 8 November 2023 letting us know that 'at least part of our property' may fall into the new 'Highly Productive Land Overlay' mapping. Referring to the detail in your letter, it is likely that we would be in support of the new overlay.

If it's possible, could we please have emailed, a copy of the draft District Plan map of our property and those 1km either side of [REDACTED] indicating the areas that will be affected by the new overlay?

Thank you and regards

[REDACTED]

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Sunday, 10 December 2023 9:54 pm
To: District Plan Team
Subject: [EXTERNAL] [REDACTED] regarding district plan review

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Hi

I received the letter regarding the district draft plan and understood my property is in the high hazards area. This draft plan is really disappointing us.

We own this property from 2018 December.

We never experienced any flooding or never heard from previous owner about flooding in this property. In my observation this stream has decent depth and flowing well during the heavy rains with out any problems.

We are very concerned about the future of our property now. ie; this plan may cause to reduce the property value, so it will affect the sales and purchases of the property, new buildings and subdivision of the property, etc. It will create a negative impression to the property.

It is in a medium density area.

So we are humbly requesting you to consider our concerns and move our property from high hazards property to low or medium hazards property.

Many thanks

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [District Plan Review Team](#)
Cc: [REDACTED]
Subject: [EXTERNAL] RE: District Plan and Intensification: Queens Grove Central Lower Hutt
Date: Wednesday, 22 November 2023 10:08:15 am
Attachments: [image001.png](#)

Hi there Stephen,

Further to the email exchange we have already had, firstly thank you very much for your responses and insight.

Having read the Council's submission to Parliament's Environment Select Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill 2021 were very heartened to see your submission and the position taken on a number of matters.

So, we are giving our feedback on two fronts:

- a. We are going to pass on our thoughts below to the new incoming Government via Chris Bishop in the hope that his promised changes to the Housing Bill will take consideration of our points below
- b. Also, we are hoping that our feedback below, and the hoped-for Government changes will mean that our comments will help influence the HCC to tweak the current District Plan

Our feedback:

1. Overall principle: A community and people-based city:

- I see that in the last census the median age in Hutt City is marginally younger than the national average, and that average income is higher than the national average
- These facts reinforce in our minds that given Hutt City has traditionally been a city for families, that we should continue to foster this community approach vs creating a city whereby community connection is sucked from it through high-rise apartments that foster isolated living
- In order for Hutt City to retain widespread appeal and be a pleasant, lively and liveable community we need to retain community character through the provision of quality housing with modern character while also preserving existing older style homes with unique charm
- The importance of access to green spaces increases as population increases (see point #4), as does access to good public transport and amenities that will mean that families of all sorts (young and old) will be attracted to live and work here
- In short: please do not forsake community amenities and open spaces that encourage neighbourly connection for endless in-built rows of characterless homes devoid of green spaces

2. Height concerns

- We believe that the height of residential buildings throughout the Hutt Valley should be limited to 3 stories within close walking distance of large transport hubs *only*
- This will support the desire for an increase in housing stock while encouraging the move towards no-car lifestyles and city wide carbon reduction targets
- The limit to 3 stories will help to retain the character of our streets and city, protect neighbourhood privacy, lessen wind tunnels and retain the feeling of community vs *largescale* isolated/apartment-style living

3. Off street parking :

- a. We intend to write to the new Government to urge a change to the Housing Supply Bill to regulate that new builds should always cater for off-street parking and we note from your Parliamentary submission that you are currently not able to enforce

this

- b. We hope that you can change the District Plan to insist that new developments provide off street parking which alleviates the following (obvious) concerns in a community:
 - i. Ability to have Electric Vehicle (EV) car charging on-site vs curb side: Infrastructure builds for curb side charging are considerable and the ability to have enough publicly funded and available infrastructure to cater for a dominant EV future is low. We must have car owners able to charge at home
 - ii. Clogged streets: with the increasing number of multi-car households the clogging of streets is becoming a problem for both driving in narrow streets, car door openings with cyclists on the streets, and lack of casual visitor parking when moving about the city
 - iii. Car theft reduction: this has become a plague in our community and this is felt very much in Queens Grove where car theft is a considerable problem for residents and visitors alike
4. Mandatory green spaces in new development (and more established) areas:
 - a. We would urge the council to take into the District Plan rock solid commitments to green spaces right across the city
 - b. We are disappointed and disagree that it appears within the District Plan that the HCC is focussing on four activity areas in the valley only (Section 7):
 - i. This focus is too limited with respect to locations and does not provide good proximity for the majority of residents
 - ii. Related to the above, this does not promote easy recreation or creation and maintenance of smaller green spaces within short/minimal walking distance for most residents eg 'pocket parks'
 - iii. It appears to be ticking the green and recreational box in the city vs making life / recreation / a pleasant environment / community interaction a core part of our city planning
 - c. Other cities, even one as large as London have placed huge and ever increasing importance on greening of the city for the benefit of the citizens, flood reduction, help with control and reduction of emissions etc.

We would expect the HCC to adopt similar policies as an example below from Westminster City Council London (reference is [here](#)):

 - i. *"Pocket parks and smaller areas of open space can be as valuable as large sites as they have a range of functions for the people that use them. This incremental approach is also valuable for overall greening of the whole city. Incorporating green infrastructure onto walls and buildings is hugely valuable additional infrastructure."*
 - ii. *"User surveys and feedback from the public highlight just how highly valued by the local community Westminster's open spaces are. Open spaces refer to all open spaces of public value, including not just land, but also areas of water which offer opportunities for sport and recreation and can act as a visual amenity. Access to nature is important for individual and collective wellbeing, and our parks, open spaces and green infrastructure provide opportunities for people to be physically active and do things which benefit all aspects of their health. We want to capitalise on this, helping as many people as possible to feel the benefits and increase the accessibility of our open spaces."*
 - iii. The Westminster Council also outlines the considerable economic benefits of green spaces

and the greening of a huge city like London has become very obvious in the last decade. Green walls and roofs are a common sight in Westminster now with buildings “showing them off” almost like tourist attractions in their own right

We’d welcome your comments on the above prior to sending a similar message to Chris Bishop, as we genuinely want to assist HCC to be empowered to make positive changes for our community vs being rail-roaded into undesirable planning by Government legislation.

Thanks and kind regards

From: District Plan Review Team <district.plan@huttcity.govt.nz>

Sent: Friday, October 6, 2023 4:31 AM

To: [REDACTED]

Cc: [REDACTED] District Plan Review Team <district.plan@huttcity.govt.nz>

Subject: RE: [EXTERNAL] RE: District Plan and Intensification: Queens Grove Central Lower Hutt
Hi Trina,

In response to your questions:

Q1:

The most relevant policies for immediate neighbours are 4G 3.4 (resource consents for developments), 4G 3.7 (landscaping), 4G 3.8 (privacy and access to sunlight), 4G 3.9 (design principles), 4G 3.10 (attractive and safe streets and public spaces), and the matters of discretion in rule 4G 4.2.1(b). There are also matters of discretion associated with performance standards, in case any of those are breached. In a scenario where you had the ability to object (a notified resource consent), you can object on whatever grounds you like. However, the policies guide, and the matters of discretion limit, what the decision-maker would take into account.

I say “generally” because I’m summing up quite a large plan. For an exact answer, you’ll need to read the plan and assess the particular scenario you’re thinking of.

In terms of deciding who is significantly impacted, this is a decision made by a council planner in the resource consents team. They apply a test set out in legislation. You would often be considered impacted if the proposal breaches one of the standards specifically designed to protect neighbours, such as the height in relation to boundary rule (4G 4.2.4) or setbacks (4G 4.2.5). You generally wouldn’t be considered impacted if the development meets all relevant standards, but still requires resource consent for technical matters (e.g. subdivision, infrastructure matters, wind mitigation). You would not be considered impacted if the development does not need resource consent at all.

Q2:

I’ll add you all to our mailing list.

We’re expecting submissions to be open from about late this month to at least December. This is an informal engagement process – there will also be a formal submissions process when the plan is formally proposed next year.

Q3:

Mr Bishop is referring to the 2021 medium density residential standards legislation, which provided for 3-storey townhouses across the city. The Council’s submission on the medium density legislation is available on the Parliament website here:

https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/53SCEN_EVI_116288_EN8582/hutt-city-council, and Parliament’s website also contains the version of the legislation at the time the submission was written. This medium density legislation is different to the National Policy Statement on Urban Development 2020, which directed the high density development requirement around the city centre, which is the

direction relevant to your area. I can't find any record of HCC submitting on or making a formal position statement on the National Policy Statement on Urban Development.

Q4:

The District Plan maps are available online at

<https://maps.huttcity.govt.nz/portal/apps/webappviewer/index.html?id=b57270f1aa9348e295ef775ad04537ff> – turn on “District Plan” in the left pane.

Q5:

The council does not have the power to require that developers provide off-street parking.

Council manages on-street parking in accordance with the Parking Policy 2017, which is available at

https://hccpublicdocs.azurewebsites.net/api/download/dca10d32fed24fb48c89a051398ef73e/_CM9-WE/937d069c128aa8c4587aed4941b4a5a7d4c and is not being reviewed as part of the District Plan review.

Q6:

Yes. The impact of construction on the aquifer is managed by the regional council, and resource consent from the regional council is required for foundations that might put the aquifer at risk (deeper than 5 metres).

Q7:

Tree cover and stormwater management have been considered in developing the draft plan. I encourage you to read the draft plan's provision on these issues when it comes out and have your say.

Kind regards,

Stephen Davis

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt

P: 04 570 6666 **M:** **W:** www.huttcity.govt.nz



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From: [REDACTED]

Sent: Friday, October 6, 2023 9:35 AM

To: District Plan Review Team <district.plan@huttcity.govt.nz>

Cc: [REDACTED]

Subject: [EXTERNAL] RE: District Plan and Intensification: Queens Grove Central Lower Hutt

Hi there Stephen,

Thanks very much for your response below. We have some further questions as follows ...

Question 1: regarding Queens Grove especially:

- May we first say that we are astounded (!!) that 10 storey buildings could be allowed in what is otherwise a quiet, residential neighbourhood
- Regarding the means of objection:
 - Policy 4G 3.9 vi
 - <https://huttcity.isoplan.co.nz/eplan/rules/0/111/0/0/0/18> “Achieve reasonable sunlight, daylight, and outlook for all residential units and associated outdoor spaces where possible, while minimising overlooking of neighbouring living and private outdoor spaces”
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 - You say that “Buildings of that scale would generally need resource consent” – how do you define “generally”?
- Who decides whether a neighbour is going to be “significantly impacted”, and how is that done?

Question 2: re new District Plan release and consultation timing

- When you publish the draft District Plan and invite submissions, could you please add myself and my Mother and Father to the distribution list?
- What is the timing for submissions to be placed regarding the plan?

Question 3: councils attitude to intensification and especially 10-storey height

- We understand from contacting Chris Bishop regarding this position on the matter that *“The Hutt Council submitted against the original legislation for MDRS etc – and asked for more discretion which we [will give] them [if they win the election.]”*
- Can you please let us know:
 - What you submitted against?
 - Was this mitigated so that you now support it?
 - What is the current position regarding increasing the height allowance and intensification?
 - What is the discretion that you have been seeking?

Question 4: zoning maps

- Can you please supply the zoning map around the Queens Grove area?
- I am concerned that perhaps the residential zone is being compromised the commercial zone encroachment

Question 5: parking

- Are the changes to the plan that you are looking to make going to include mandatory consideration for developers of on-site off-road parking spaces vs crowding streets?

Question 6: artesian system

- For Lower Hutt in particular are you aware of the probable impact the any deep piles to support high buildings on the artesian water system and the potential for punching the capping of this valuable and irreplaceable resource? The artesian system makes a substantial contribution to our water supply and Graeme has written a number of scientific articles on the science behind the system and where the capping lies and is therefore at risk of puncture and water degradation or supply loss

Question 7: trees and plants in the environment

- On a related but very important note, what are the considerations that you have in mind regarding ensuring that our towns and cities don’t turn into a concrete jungle that are treeless, therefore creating “urban heat islands”, increasing the impact of green house gases as trees and gardens are removed
- And on a very practical note these environments have little capacity for absorption of

rainwater run off and therefore place pressure on existing waste water services. In cities overseas as you no doubt know, there is strong regulatory encouragement for greening of cities alongside development to enhance beauty, help with rain water run-off absorption, and CO2 reduction

Thanks for your help.

With kind regards

[REDACTED]

From: District Plan Review Team <district.plan@huttcity.govt.nz>

Sent: Monday, September 25, 2023 4:00 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: [EXTERNAL] District Plan and Intensification: Queens Grove Central Lower Hutt
Hi Trina,

In response to your questions:

1. Queens Grove is within the High Density Residential Activity Area and due to its proximity to the city centre has a 36 metre height overlay. This means that buildings of up to around 10 storeys are generally provided for, subject to various standards and resource consent.
2. Buildings are subject to various daylight restrictions including a height-in-relation-to-boundary rule and a building coverage rule. For details see the High Density Residential Activity Area chapter in the District Plan:

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Buildings of that scale would generally need resource consent. In most cases if the restrictions I mention aren't met and the processing planner thinks the development might have a significant impact on you, you would be notified about your ability to participate in the resource consent process. You might also be contacted directly by a developer asking for your approval to an application, and it would be up to you whether to grant that approval and under what conditions. If you didn't grant the approval that doesn't necessarily mean the application would not be able to go ahead.

3. We will be publishing our draft district plan and topic-specific factsheets for public feedback in around late October. We'll be collecting all the feedback on this and presenting it to elected councillors to make decisions on the new district plan we intend to notify mid next year.
4. We don't provide a custom service to notify people about applications for building and resource consents, but we publish a monthly summary of granted consents at <https://www.huttcity.govt.nz/property-and-building/property/consents-issued>. For resource consents that are open for public submissions, you will be notified (generally by post) if you are deemed to be significantly affected, and that notice will include information on how to have your say.

Let me know if you've got any other questions.

Kind regards,

Stephen Davis

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt

P: 04 570 6666 **M:** **W:** www.huttcity.govt.nz



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From: [REDACTED]
Sent: Monday, September 25, 2023 11:06 AM
To: District Plan Team <DistrictPlan.Team@huttcity.govt.nz>
Cc: [REDACTED]

Subject: [EXTERNAL] District Plan and Intensification: Queens Grove Central Lower Hutt
Hi there District Plan team,

On your website (<https://www.huttcity.govt.nz/council/district-plan/district-plan-review/housing>) we see the overview of the new Housing Supply Act and the implications for Lower Hutt. You also note that “Some residents are understandably concerned that large blocks will be able to be built next to their home and they will be unable to do anything about it. This district plan review is your chance to have a say on how we can follow the new requirements while still shaping the best possible outcomes for the current and future residents of Lower Hutt.”

Living in Queens Grove, my parents (copied) are very concerned that indeed they may have a 6 story intensively infilled property built beside their small home.

Can you please direct us to sections of the District Plan or preferably provide information on the following please:

1. What the exact implications are for Queens Grove ie does the 6 story building allowance apply to this street? (Your zoning map didn't appear to show that unless I missed it)
2. Are there grounds for objections for potential applications for either infill housing or especially for a 6 story proposed building on a residential street? Can you please link us to the information regarding the objection process especially around daylight restriction etc?
3. The website mentions that residents can “have their say” what is the method to do this?
4. On a very practical note, is there a notification process to residents that we can register for if applications are made for building works within Queens Grove?

We would appreciate your thoughts. Thanks for your help, kind regards

[REDACTED]

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Wednesday, 22 November 2023 10:08 am
To: District Plan Review Team
Cc: [REDACTED]
Subject: [EXTERNAL] RE: District Plan and Intensification: Queens Grove Central Lower Hutt

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Hi there Stephen,

Further to the email exchange we have already had, firstly thank you very much for your responses and insight.

Having read the Council's submission to Parliament's Environment Select Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill 2021 were very heartened to see your submission and the position taken on a number of matters.

So, we are giving our feedback on two fronts:

- a) We are going to pass on our thoughts below to the new incoming Government via Chris Bishop in the hope that his promised changes to the Housing Bill will take consideration of our points below
- b) Also, we are hoping that our feedback below, and the hoped-for Government changes will mean that our comments will help influence the HCC to tweak the current District Plan

Our feedback:

1. Overall principle: A community and people-based city:

- I see that in the last census the median age in Hutt City is marginally younger than the national average, and that average income is higher than the national average
- These facts reinforce in our minds that given Hutt City has traditionally been a city for families, that we should continue to foster this community approach vs creating a city whereby community connection is sucked from it through high-rise apartments that foster isolated living
- In order for Hutt City to retain widespread appeal and be a pleasant, lively and liveable community we need to retain community character through the provision of quality housing with modern character while also preserving existing older style homes with unique charm
- The importance of access to green spaces increases as population increases (see point #4), as does access to good public transport and amenities that will mean that families of all sorts (young and old) will be attracted to live and work here
- In short: please do not forsake community amenities and open spaces that encourage neighbourly connection for endless in-built rows of characterless homes devoid of green spaces

2. Height concerns

- We believe that the height of residential buildings throughout the Hutt Valley should be limited to 3 stories within close walking distance of large transport hubs *only*
- This will support the desire for an increase in housing stock while encouraging the move towards no-car lifestyles and city wide carbon reduction targets

- The limit to 3 stories will help to retain the character of our streets and city, protect neighbourhood privacy, lessen wind tunnels and retain the feeling of community vs *largescale* isolated/apartment-style living

3. Off street parking :

- a. We intend to write to the new Government to urge a change to the Housing Supply Bill to regulate that new builds should always cater for off-street parking and we note from your Parliamentary submission that you are currently not able to enforce this
- b. We hope that you can change the District Plan to insist that new developments provide off street parking which alleviates the following (obvious) concerns in a community:
 - i. Ability to have Electric Vehicle (EV) car charging on-site vs curb side: Infrastructure builds for curb side charging are considerable and the ability to have enough publicly funded and available infrastructure to cater for a dominant EV future is low. We must have car owners able to charge at home
 - ii. Clogged streets: with the increasing number of multi-car households the clogging of streets is becoming a problem for both driving in narrow streets, car door openings with cyclists on the streets, and lack of casual visitor parking when moving about the city
 - iii. Car theft reduction: this has become a plague in our community and this is felt very much in Queens Grove where car theft is a considerable problem for residents and visitors alike

4. Mandatory green spaces in new development (and more established) areas:

- a. We would urge the council to take into the District Plan rock solid commitments to green spaces right across the city
- b. We are disappointed and disagree that it appears within the District Plan that the HCC is focussing on four activity areas in the valley only (Section 7):
 - i. This focus is too limited with respect to locations and does not provide good proximity for the majority of residents
 - ii. Related to the above, this does not promote easy recreation or creation and maintenance of smaller green spaces within short/minimal walking distance for most residents eg 'pocket parks'
 - iii. It appears to be ticking the green and recreational box in the city vs making life / recreation / a pleasant environment / community interaction a core part of our city planning
- c. Other cities, even one as large as London have placed huge and ever increasing importance on greening of the city for the benefit of the citizens, flood reduction, help with control and reduction of emissions etc.

We would expect the HCC to adopt similar policies as an example below from Westminster City Council London (reference is [here](#)):

- i. *"Pocket parks and smaller areas of open space can be as valuable as large sites as they have a range of functions for the people that use them. This incremental approach is also valuable for overall greening of the whole city. Incorporating green infrastructure onto walls and buildings is hugely valuable additional infrastructure."*
- ii. *"User surveys and feedback from the public highlight just how highly valued by the local community Westminster's open spaces are. Open spaces refer to all open spaces of public value, including not just land, but also areas of water which offer opportunities for sport and recreation and can act as a visual amenity. Access to nature is important for individual and collective wellbeing, and our parks, open spaces and green infrastructure provide opportunities for people to be physically active and do things which benefit all aspects of their health. We want to capitalise on this, helping as many people as possible to feel the benefits and increase the accessibility of our open spaces."*
- iii. The Westminster Council also outlines the considerable economic benefits of green spaces and the greening of a huge city like London has become very obvious in the last decade. Green walls and roofs are a common sight in Westminster now with buildings "showing them off" almost like tourist attractions in their own right

We'd welcome your comments on the above prior to sending a similar message to Chris Bishop, as we genuinely want to assist HCC to be empowered to make positive changes for our community vs being rail-roaded into undesirable planning by Government legislation.

Thanks and kind regards
[REDACTED]

From: District Plan Review Team <district.plan@huttcity.govt.nz>

Sent: Friday, October 6, 2023 4:31 AM

To: [REDACTED]

Cc: [REDACTED] District Plan Review Team <district.plan@huttcity.govt.nz>

Subject: RE: [EXTERNAL] RE: District Plan and Intensification: Queens Grove Central Lower Hutt

Hi Trina,

In response to your questions:

Q1:

The most relevant policies for immediate neighbours are 4G 3.4 (resource consents for developments), 4G 3.7 (landscaping), 4G 3.8 (privacy and access to sunlight), 4G 3.9 (design principles), 4G 3.10 (attractive and safe streets and public spaces), and the matters of discretion in rule 4G 4.2.1(b). There are also matters of discretion associated with performance standards, in case any of those are breached. In a scenario where you had the ability to object (a notified resource consent), you can object on whatever grounds you like. However, the policies guide, and the matters of discretion limit, what the decision-maker would take into account.

I say "generally" because I'm summing up quite a large plan. For an exact answer, you'll need to read the plan and assess the particular scenario you're thinking of.

In terms of deciding who is significantly impacted, this is a decision made by a council planner in the resource consents team. They apply a test set out in legislation. You would often be considered impacted if the proposal breaches one of the standards specifically designed to protect neighbours, such as the height in relation to boundary rule (4G 4.2.4) or setbacks (4G 4.2.5). You generally wouldn't be considered impacted if the development meets all relevant standards, but still requires resource consent for technical matters (e.g. subdivision, infrastructure matters, wind mitigation). You would not be considered impacted if the development does not need resource consent at all.

Q2:

I'll add you all to our mailing list.

We're expecting submissions to be open from about late this month to at least December. This is an informal engagement process – there will also be a formal submissions process when the plan is formally proposed next year.

Q3:

Mr Bishop is referring to the 2021 medium density residential standards legislation, which provided for 3-storey townhouses across the city. The Council's submission on the medium density legislation is available on the Parliament website here: https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/53SCEN_EVI_116288_EN8582/hutt-city-council, and Parliament's website also contains the version of the legislation at the time the submission was written. This medium density legislation is different to the National Policy Statement on Urban Development 2020, which directed the high density development requirement around the city centre, which is the direction relevant to your area. I can't find any record of HCC submitting on or making a formal position statement on the National Policy Statement on Urban Development.

Q4:

The District Plan maps are available online at

<https://maps.huttcity.govt.nz/portal/apps/webappviewer/index.html?id=b57270f1aa9348e295ef775ad04537ff> – turn on “District Plan” in the left pane.

Q5:

The council does not have the power to require that developers provide off-street parking. Council manages on-street parking in accordance with the Parking Policy 2017, which is available at

<https://hccpublicdocs.azurewebsites.net/api/download/dca10d32fed24fb48c89a051398ef73e/CM9-WE/937d069c128aa8c4587aed4941b4a5a7d4c> and is not being reviewed as part of the District Plan review.

Q6:

Yes. The impact of construction on the aquifer is managed by the regional council, and resource consent from the regional council is required for foundations that might put the aquifer at risk (deeper than 5 metres).

Q7:

Tree cover and stormwater management have been considered in developing the draft plan. I encourage you to read the draft plan’s provision on these issues when it comes out and have your say.

Kind regards,
Stephen Davis

District Plan Review Team

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P: 04 570 6666 M: W: www.huttcity.govt.nz



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Thanks for your help.

With kind regards

From: District Plan Review Team <district.plan@huttcity.govt.nz>

Sent: Monday, September 25, 2023 4:00 AM

To: Trina Stevens

Cc:

Subject: RE: [EXTERNAL] District Plan and Intensification: Queens Grove Central Lower Hutt

Hi Trina,

In response to your questions:

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Kind regards,
Stephen Davis

District Plan Review Team

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Cc: [REDACTED]
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4. On a very practical note, is there a notification process to residents that we can register for if applications are made for building works within Queens Grove?

We would appreciate your thoughts. Thanks for your help, kind regards

[REDACTED]

[REDACTED]

Saritha Shetty

From: Environment Policy <Environment.Policy@transpower.co.nz>
Sent: Tuesday, 12 December 2023 3:31 pm
To: District Plan Review Team
Subject: [EXTERNAL] Transpower New Zealand Limited Comments: Hutt City Draft District Plan
Attachments: BM230564 Transpower Comments on Hutt City Draft DP Lodged 20231209.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Tēnā koe,

Thank you for the opportunity to provide feedback on the Hutt City Draft District Plan. Please find Transpower's comments attached. We would be grateful for confirmation of receipt in due course.

Feel free to contact me if there are any queries.

Ngā mihi,

REBECCA ENG ([she/her](#))

Technical Lead - Policy

Environmental Policy and Planning Team

Transpower New Zealand Ltd

Gate 1, Ōtāhuhu Substation - Gridco Road, Ōtara, Auckland

PO Box 17215, Greenlane, Auckland 1546

P 09 590 7072

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Comments by Transpower New Zealand Ltd on the City of Lower Hutt Draft District Plan

December 2023

Keeping the energy flowing



TRANSPOWER



Comments by Transpower New Zealand Ltd to inform the City of Lower Hutt Draft District Plan

Background

The following comments are provided to inform the review of the City of Lower Hutt District Plan and to ensure that its corresponding planning framework appropriately recognises and provides for the National Grid. The District Plan review provides an opportune time to update the provisions and ensure the District Plan gives effect to the NPSET.

From Transpower's perspective, the provisions of the draft District Plan ("draft DP") need to ensure:

- That the National Policy Statement on Electricity Transmission 2008 ("NPSET" or "NPS") is given effect to.
- The sustainable management of the National Grid as a physical resource of national significance is recognised.
- The benefits of the National Grid at local, regional and national levels are recognised and provided for.
- The need for the ongoing operation and maintenance of the network is recognised; and
- The protection of the National Grid from issues of reverse sensitivity and the adverse effects of others' activities (including sensitive activities) is recognised to ensure the National Grid is not compromised.

To inform the district plan review, the following outlines:

- 1) Background information on Transpower and the Statutory Framework within which it operates, including existing National Grid assets within Lower Hutt City
- 2) An overview of the framework Transpower typically supports and seeks in relation to the National Grid
- 3) An overview of the concerns Transpower has with the current provisions within the operative City of Lower Hutt District Plan
- 4) Provision of specific amendments Transpower would support in the district plan review. Transpower would like to highlight that the review primarily focuses on National Grid provisions in the draft plan.

The sought policies, rules and definitions and mapping approach have been adopted in all of Transpower's district plan process over the past 12 years. Such reviews include district plans for the following cities/districts – Waikato, Dunedin, Kapiti, Christchurch, Queenstown, Invercargill, Rotorua, Opotiki, Whakatane, Hurunui, South Taranaki, Horowhenua, Thames Coromandel, and Hastings. More recent plan reviews to which Transpower has sought this approach include Porirua, Central Hawkes Bay, New Plymouth, Wellington, Waimakariri, Timaru, Waitomo, and Selwyn. The Auckland Unitary Plan has a slightly different approach for its corridor to reflect the highly urbanised nature of Auckland.

1. Introduction to Transpower and Statutory Framework

Transpower is a State-Owned Enterprise that plans, builds, maintains owns and operates New Zealand’s National Grid, the high voltage transmission network for the country. Essentially the National Grid carries electricity around the country. It connects power stations owned by generating companies to substations feeding local networks that distribute electricity to homes and businesses. Some businesses that are intensive electricity users connect directly to the National Grid. The role of Transpower is shown in Figure 1 below, in relation to “Transmission” and “substations”.

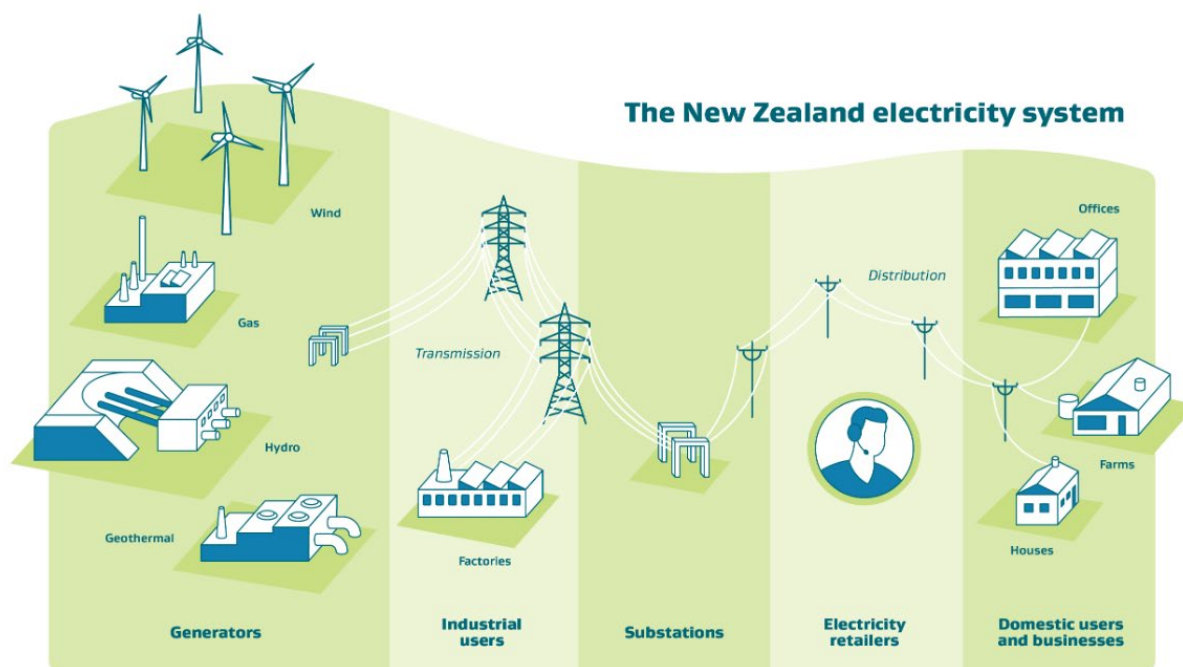


Figure 1. Role of Transpower in New Zealand's electricity industry. (Source: MBIE)

The National Grid comprises towers, poles, lines, cables substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower’s role and function is determined by the State-Owned Enterprises Act 1986, the company’s Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

Transpower’s Statement of Corporate Intent for July 2023 to June 2026, states that:

Transpower is central to the New Zealand electricity industry. We connect generators to distribution companies and large users over long distances, providing open access and helping to balance supply and demand. The nature and scope of the activities we undertake are:

- *as grid owner, we own, build, maintain, replace, and enhance the physical infrastructure that connects those who generate and those who need electricity to live, work and play across the country, and*
- *as system operator, through a service provided under contract to the Electricity Authority under the Electricity Industry Participation Code, we operate the electricity market, managing supply and demand for electricity in real time to ensure that the power system remains stable and secure.*

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It has to be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's "Whakamana i Te Mauri Hiko" predicts that electricity demand is likely to increase around 55% by 2050. Whakamana i Te Mauri Hiko suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient District Plan where it may affect the National Grid, including possible future changes. It should also be noted that Transpower cannot foresee all future development of the National Grid, particularly as it has an obligation to connect new electricity generation developments to the National Grid, and they can be located almost anywhere.

City of Lower Hutt Assets

Transpower has a significant number of overhead transmission line, substation and telecommunications assets within Lower Hutt City, comprising the following:

- Bunnythorpe – Haywards A 220kV line (BPE-HAY A)
- Bunnythorpe – Haywards B 220kV line (BPE-HAY B)
- Haywards – Melling A 110kV line (HAY-MLG A)
- Haywards – Melling B 110kV line (HAY-MLG B)
- Haywards – Takapu Road A 110kV line (HAY-TKR A)
- Haywards – Upper Hutt A 110kV line (HAY-UHT A)
- Oteranga Bay - Haywards A 350kV line (OTB-HAY A)
- Gracefields – Haywards A 110kV line (GFD-HAY A)
- Haywards – Judgeford 220kV line (HAY-JFD A)

- Haywards Substation (both AC and DC switchyards)
- Melling Substation
- Gracefield Substation

All lines within Hutt City are on towers. There are no existing pole support structures.

Refer to Appendix 1 for a map showing the location of these assets.

Statutory Framework

National Policy Statement on Electricity Transmission

The National Policy Statement on Electricity Transmission was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act (“RMA”) duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid. The NPSET only applies to the National Grid – the assets used or owned by Transpower – and not to electricity generation or distribution networks. A copy of the NPSET is attached as **Appendix 2**.

The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, councils have to work through how to make appropriate provision for the National Grid in their District Plans, in order to give effect to the NPSET.

The one objective of the NPSET is as follows:

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policy 1 of the NPSET provides that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy, development and use of new electricity generation, and enhanced supply.

Policies 2 to 9 provide RMA decision-makers direction for managing the environmental effects of transmission activities.

Recognition of the development of the National Grid is also required in Policy 2 of the NPSET, in that “decision makers must recognise and provide for ... the development of the electricity transmission network”. Policy 2 is as follows:

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

Policies 3 to 5 contain matters to which decision-makers must consider or have regard, including:

- the constraints imposed on avoiding, remedying or mitigating adverse effects by the technical and operational requirements of the network
- the role of the route, site and method selection process in avoiding, remedying or mitigating adverse effects for new or major upgrades of transmission infrastructure, and
- the enablement of the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

Policies 6 to 8 relate to Transpower's responsibilities under the NPSET, with Policy 6 promoting the reduction of existing adverse effects where substantial upgrades of transmission line infrastructure are undertaken. Policies 7 and 8 relate to circumstances in which the effects of transmission infrastructure could be reduced, minimised or avoided in urban and rural environments. Policy 9 specifically relates to standards for dealing with electric and magnetic fields.

Policy 8 of the NPSET directs that within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain environments/areas (being outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity, and existing sensitive activities). The wording of NPSET policy 8 ("should seek to avoid") does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET).

Policy 8 is as follows:

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District (City) Plan to address. The policies seek to manage activities to ensure the operation, maintenance, upgrading and development of the National Grid is not compromised, avoid sensitive activities locating in close proximity to electricity transmission lines and infrastructure, and manage other activities to avoid reverse sensitivity effects on the network. Policy 10 is as follows:

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

Policy 11 relates to the development of buffer corridors, and is as follows:

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these

corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Policies 13 and 14 relate to the long-term strategic planning for transmission assets.

Section 75(3)(a) of the RMA requires that District (City) Plans must 'give effect' to a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

It is therefore a requirement that local policy reflects national direction and that the local policy is effective in helping support the integrated management of natural and physical resources within the city, as well as across the region as a whole.

Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009

The Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009 ("NESETA") came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010: it does not apply to substations or electricity distribution lines, and nor does it apply to the construction of new transmission lines (which are typically designated).

Activities covered by the NESETA are activities relating to the operation, maintenance, upgrading, relocation or removal of an existing transmission line, including:

- a construction activity
- use of land or occupation of the coastal marine area
- activities relating to an access track to an existing transmission line
- undergrounding an existing transmission line.

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The NESETA regulates how Transpower's existing lines in Hutt City are developed and maintained, rather than the District Plan Rules. In accordance with Section 43B of the RMA, the district plan rules cannot be more lenient or stringent than the NESETA rules and therefore the NESETA rules in effect prevail.

2. Framework and provisions typically sought by Transpower

A key issue for Transpower is how the District Plan review intends to give effect to the NPSET. Transpower participated in the 2016 Plan Change 34 "Network Utilities" which introduced National Grid corridor provisions to the District Plan to give effect to Policies 10 and 11 of the NPSET. It is noted that a number of provisions sought by Transpower were considered out of scope of the plan change and therefore the provisions made operative do not align with the current approach Transpower seeks.

While the operative District Plan identifies a National Grid corridor, Transpower considers that the District Plan review is an opportunity to align all of the provisions relevant to the National Grid with

the approach typically sought by Transpower in District Plan reviews nationally. That is, to give effect to the NPSET in full including provisions to enable the National Grid, to manage the effects of substantial upgrades and new National Grid infrastructure and provisions to manage effects on the National Grid.

The following explains the framework and provisions sought by Transpower, and explains how they differ from what is in the operative District Plan.

Inclusion of National Grid specific provisions and placement

Provisions specific to the National Grid are supported on the basis that unlike other regionally significant infrastructure (or Network Utilities), the National Grid has specific NPS policy recognition that is required to be given effect to. Over recent years during its involvement in numerous plan processes Transpower has observed some tensions between enabling Regionally Significant Infrastructure (“RSI”) provisions and some strict avoid policy provisions for the natural environment (specifically outstanding natural features and landscapes at a district plan level). While in the past a policy approach in which the National Grid is addressed through general RSI policies has been incorporated in to plans, Transpower’s more recent experience is that Councils have tended to adopt standalone National Grid specific policies and rules to recognise the national significance of the National Grid and give effect to the NPSET. Transpower supports this approach provided the NPSET is given effect within the Plan.

In general, Transpower supports the location of all objectives, policies and rules that are specific to the National Grid in the Energy and Infrastructure chapter (within the National Planning Standards District (City) Plan structure) as opposed to being dispersed across zone chapters.

Specific Provisions

The need to operate, maintain, upgrade and develop the electricity transmission network is recognised as a matter of national significance through the NPSET. This significance applies universally across the country regardless of the nature of the specific National Grid asset. There are three broad aspects to the NPSET which must be given effect to in district (city) plans, as below.

- **Enabling the National Grid:** Policies and plans must provide for the effective operation, maintenance, upgrading and development of the National Grid. This includes recognising and providing for the national benefits. In terms of its existing assets, Transpower undertakes a wide range of maintenance activities across its entire asset base. Typical maintenance activities include earthworks, vegetation trimming and clearance, and support structure maintenance activities. Some but not all of these activities are regulated under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.

Transpower considers it necessary for the District Plan to adopt an enabling framework through which the national significance and benefits of the National Grid can be considered, recognised and provided for.

- **Managing the effects of the National Grid:** Associated with the development of National Grid assets is the potential for adverse environmental effects. The development of the National Grid must therefore be managed to ensure the potential for adverse effects is appropriately managed while recognising the significance of the National Grid and the constraints under which it operates. The NPSET requires the District Plan to include objectives and policies that:

- Allow for the consideration of the technical constraints and operational requirements under which the National Grid operates e.g. the linear nature of the transmission lines.
- Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site and method selection.
- Ensure planning and development of the National Grid has regard to the existing environment, with a 'seek to avoid' policy directive for the more sensitive environments.

This policy direction within the NPSET sets an appropriate rule framework for National Grid infrastructure.

The above means policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and method selection process when considering the adverse effects of new National Grid infrastructure on the environment.

- **Managing the effects on the National Grid:** A significant resource management issue in Hutt City and across New Zealand is inappropriate development, land use (including earthworks) and subdivision in close proximity to the National Grid, which can compromise its operation, maintenance, development and upgrade, and result in reverse sensitivity effects. Under the NPSET, plans must include provisions to protect the National Grid from other activities.

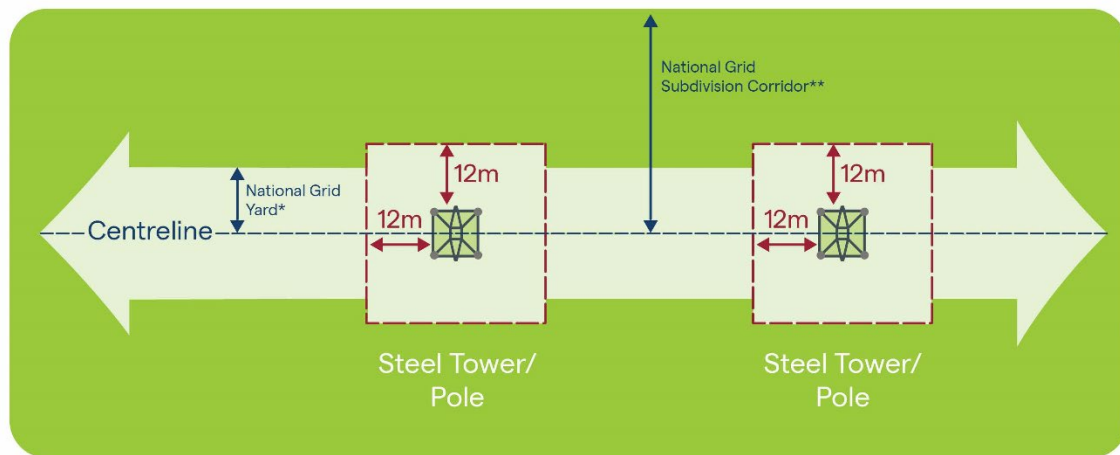
The most effective and efficient way of managing the potential for adverse effects on the National Grid is to adopt a corridor approach. This corridor approach is often referred to as the "*National Grid Yard*" and the "*National Grid Subdivision Corridor*". The corridor approach has a number of purposes including - to restrict sensitive activities; manage reverse sensitivity effects; protect the grid; enable safe and efficient operation and maintenance; allow for future upgrade works; ensure security of supply; and minimise safety hazards. Adopting the *National Grid Yard* approach is supported by NPSET Policy 11 that requires councils to consult with Transpower to identify an appropriate buffer corridor, within which sensitive activities should generally not be provided for. To give effect to Policy 10 Transpower seeks that the *National Grid Yard* is relied upon as an effective and efficient way of managing other non-sensitive activities and development that could compromise the National Grid and create reverse sensitivity impacts.

The *National Grid Yard* is necessary to:

- a. Ensure the network can be efficiently operated, maintained, developed and upgraded by providing the working area and access space to do this.
- b. Manage reverse sensitivity effects.
- c. Ensure sensitive activities and non-sensitive activities and development that could compromise the National Grid are generally not provided for in the vicinity of the lines.
- d. Protect the safety of both the National Grid and people working or living close to it.

Transpower only seeks the minimum plan restrictions necessary to ensure the NPSET is given effect to. The corridor approach allows for different size setbacks to be adopted depending on the asset type i.e. poles or towers. Importantly the *National Grid Yard* and *National Grid Subdivision Corridor* provides a consistent approach to managing the potential for adverse

effects on the National Grid. See Figure 2 for a visual representation of how the corridor is applied.



* National Grid Yard: 12m

** National Grid Subdivision Corridor: 32m or 37m depending on voltage

Figure 2 Transpower's approach to applying the National Grid Yard

Within the 'light green' area (which is termed "*The National Grid Yard*"), Transpower requests that new 'sensitive' activities such as dwellings, schools and hospitals are not allowed (non-complying activity status sought). Other 'non-sensitive' activities such as intensively used milking sheds or piggeries, commercial, warehouse or retail activities (for example), should also be managed in the same way. This approach minimises disruption to landowners from Transpower's maintenance and operational activities, maintains access to National Grid assets and keeps people and property safe. The approach gives effect to the strong policy directive within Policy 10 of the NPSET which has the requirement to "avoid reverse sensitivity effects" and "to ensure...that the electricity transmission network is not compromised". Earthworks are also sought to be managed within the *National Grid Yard*. Specifically, earthworks restrictions are supported as earthworks have the potential to undermine transmission line structures, generate dust, reduce the clearances between the ground and conductors. They also have the potential to restrict Transpower's ability to access the line and locate the heavy machinery required to maintain support structures around the lines and may lead to potential tower failure and significant constraints on the operation of the line.

The 12m *National Grid Yard* setback is based on the position of the conductors in normal everyday wind conditions, as well as space to allow the support structures and conductors to be accessed and provide sufficient space for most (but not all) maintenance activities. A 12m setback around each tower or pole (which are often referred to as support structures) is also sought for access, maintenance and safety purposes. For the above reasons, Transpower seeks restrictions on activities within the 12m *National Grid Yard*. It should be noted the provisions provided within these comments reflect that there are only tower support structures within Hutt City – no poles.

Within the wider green area (which is termed "*The National Grid Subdivision Corridor*" and which also includes the light green *National Grid Yard* area), Transpower seeks to be consulted on subdivision applications by way of restricted discretionary activity status, defaulting to non-complying where standards are not met. Transpower seeks regulation of subdivision within

corridors to prevent the creation of unusable or severely constrained lots (i.e. lots that cannot accommodate a building platform outside the *National Grid Yard* or where physical access to support structures is compromised). The width of the *National Grid Subdivision Corridor* is based on the extent of the swing of the conductors in high winds. The distance a transmission conductor swings in the wind is dependent on the ambient temperature, the power being carried, the wind speed, the type and size of conductor, the tension the conductor is strung at, the supporting structure configuration (cross arm length) and the length of the span (distance between two towers or poles). As such the subdivision corridor width increases for higher voltage lines and towers as generally the span (distance between support structures) is greater for towers and combined with a higher voltage which makes the transmission lines heavier, means the conductor swing in high winds increases. The derived *National Grid Subdivision Corridor* widths are based on a 95th percentile span across the country.

The *National Grid Subdivision Corridor* approach allows for Transpower to have an input into the configuration of new allotments to ensure access to structures is maintained and buildings and dwellings can be located outside of the red area. Transpower does not seek to restrict land use (e.g. buildings) within this broader subdivision corridor unless there is a risk that future buildings may not comply with NZECP34. The subdivision application process will enable these matters to be considered.

NZECP and Property Issues

One matter often raised in plan development is the application and relevance of the New Zealand Electricity Code of Practice for Safe Electrical Distances 2001 ("NZECP34"). NZECP34 is a code of practice that sits outside the RMA framework. The code deals solely with electrical safety issues and does not address the broader planning issues in the NPSET such as managing activities to avoid reverse sensitivity effects and considering whether development could compromise access to National Grid structures and conductors. For example, NZECP34 does not manage the subdivision of land near National Grid lines and substations, and it allows 'underbuilding'. As such reliance on NZECP in District (City) Plans is not sufficient to give effect to the NPSET.

Although Transpower has the legal right under the Electricity Act 1992 to access the lines, the physical ability to access the lines needs to be protected. The *National Grid Yard* provides a relatively clear area for line workers to gain access to the line and structures to conduct operational maintenance on Transpower assets.

The *National Grid Yard* will not eliminate all inconvenience caused by operation and maintenance activities, nor necessarily ensure full access for maintenance activities is provided in all circumstances. It attempts to strike a reasonable balance. Adoption of the *National Grid Yard* in the District Plan for all Transpower owned assets will help ensure access for routine and emergency works is maintained.

3. Concerns with the current City of Lower Hutt District Plan provisions

Having reviewed the above framework against the operative District Plan provisions, the main issues with the operative provisions can be summarised as follows:

- The setbacks that relate to the National Grid (defined in the Operative Plan as the *High Voltage Transmission Plan Area*) do not appropriately manage activities within proximity of the National

Grid, are not engineering based, and do not reflect the current and established corridor approach implemented across New Zealand. A revised corridor framework (with definitions and setbacks) is sought.

- The policy framework specific to the National Grid does not adequately give effect to the NPSET in respect of activities both on and of the National Grid. A more comprehensive and directive policy framework is sought.
- Rules and associated activity status relating to third party activities do not give effect to the NPSET, in particular policies 10 and 11. The changes sought give effect to the strong policy directive within Policy 10 and 11 of the NPSET which has the requirement to “avoid reverse sensitivity effects” and “to ensure...that the electricity transmission network is not compromised”.
- The subdivision provisions are supported in part but require amendment to give effect to the NPSET in terms of ensuring the operation, maintenance, upgrading, and development of the network is not compromised. Two new standards and a non-complying rule are sought.
- The earthworks rules are supported but amendments are required to the specifics and activity status to ensure the National Grid is not compromised by earthworks. Permitted activity rules and standards are sought, defaulting to restricted discretionary and non-complying where the standards are not met.

4. Provisions Sought

In light of the above issues Transpower seeks a number of amendments to the draft DP (refer **Appendix 3** for specific comments on draft District Plan provisions).

Transpower appreciates the opportunity to provide these comments and is more than happy to meet and discuss at any stage.

We look forward to ongoing discussions and collaboration.

Yours faithfully,



Rebecca Eng

Technical Lead – Policy

TRANSPower NEW ZEALAND LIMITED

Appendix 1. National Grid assets within the City of Lower Hutt

Transpower Assets

Lower Hutt

Legend

Territorial Land Authority

Boundary

NZ Roads

Highways

Transpower Assets

Cable Protection Zone

Overhead Fibre Cable

Underground Fibre Cables

Site

ACSTN

COMMS

HVDC

TEE

Transmission Line

0kV Overhead

11, 66kV Underground

11, 33, 66 kV Overhead

110kV Underground

110 kV Overhead

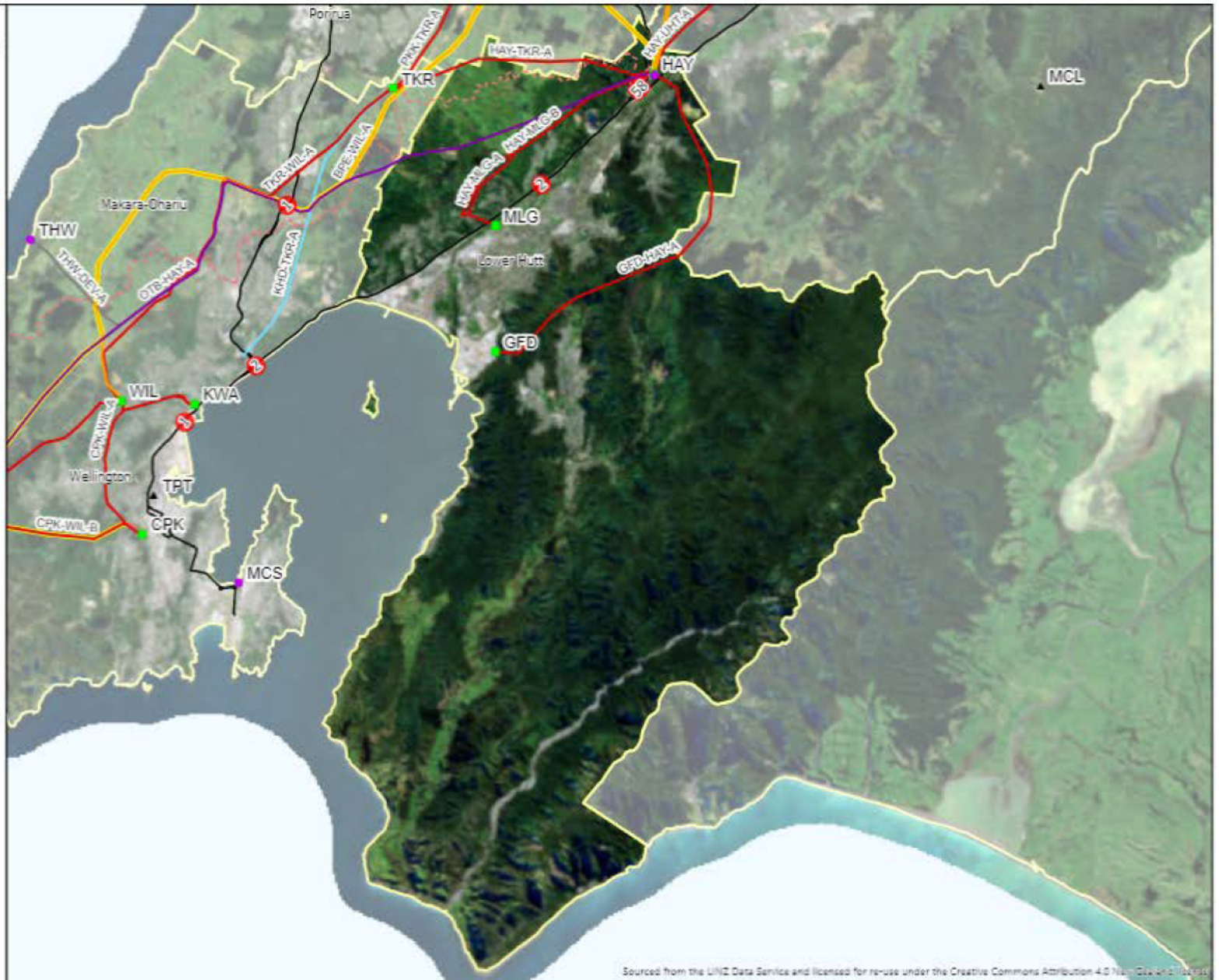
220kV Underground

220 kV Overhead

350 kV Overhead

350kV Submarine

400kV Overhead



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TRANSPOWER
Prepared by Transpower Networks

Projection: NZTM 2000 Scale: 1:133,000 Plan Size: A3L

0 1,000 2,000 km

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Date: 8/04/2020 Drawn by: berrymeham

Appendix 2. National Policy Statement for Electricity Transmission

NATIONAL POLICY STATEMENT

on Electricity Transmission

Issued by notice in the Gazette on 13 March 2008

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3. Interpretation
4. Matter of national significance
5. Objective
6. Recognition of the national benefits of transmission
7. Managing the environment effects of transmission
8. Managing the adverse effects of third parties on the transmission network
9. Maps
10. Long-term strategic planning for transmission assets

Preamble

This national policy statement sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.

In accordance with section 55(2A)(a) of the Act, and within four years of approval of this national policy statement, local authorities are to notify and process under the First Schedule to the Act a plan change or review to give effect as appropriate to the provisions of this national policy statement.

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act. These include:

- Transporting electricity efficiently over long distances requires support structures (towers or poles), conductors, wires and cables, and sub-stations and switching stations.
- These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant.
- The transmission network is an extensive and linear system which makes it important that there are consistent policy and regulatory approaches by local authorities.
- Technical, operational and security requirements associated with the transmission network can limit the extent to which it is feasible to avoid or mitigate all adverse environmental effects.
- The operation, maintenance and future development of the transmission network can be significantly constrained by the adverse environmental impact of third party activities and development.
- The adverse environmental effects of the transmission network are often local – while the benefits may be in a different locality and/or extend beyond the local to the regional and national – making it important that those exercising powers and functions under the Act balance local, regional and national environmental effects (positive and negative).
- Ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

The national policy statement is to be applied by decision-makers under the Act. The objective and policies are intended to guide decision-makers in drafting plan rules, in making decisions on the notification of the resource consents and in the determination of resource consent applications, and in considering notices of requirement for designations for transmission activities.

However, the national policy statement is not meant to be a substitute for, or prevail over, the Act's statutory purpose or the statutory tests already in existence. Further, the national policy statement is subject to Part 2 of the Act.

For decision-makers under the Act, the national policy statement is intended to be a relevant consideration to be weighed along with other considerations in achieving the sustainable management purpose of the Act.

This preamble may assist the interpretation of the national policy statement, where this is needed to resolve uncertainty.

1. Title

This national policy statement is the National Policy Statement on Electricity Transmission 2008.

2. Commencement

This national policy statement comes into force on the 28th day after the date on which it is notified in the *Gazette*.

3. Interpretation

In this national policy statement, unless the context otherwise requires:

Act means the Resource Management Act 1991.

Decision-makers means all persons exercising functions and powers under the Act.

Electricity transmission network, electricity transmission and transmission activities/assets/infrastructure/resources/system all mean part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.

National environmental standard means a standard prescribed by regulations made under the Act.

National grid means the assets used or owned by Transpower NZ Limited.

Sensitive activities includes schools, residential buildings and hospitals.

4. Matter of national significance

The matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity transmission network.

5. Objective

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- managing the adverse environmental effects of the network; and
- managing the adverse effects of other activities on the network.

6. Recognition of the national benefits of transmission

POLICY 1

In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:

- i) maintained or improved security of supply of electricity; or
- ii) efficient transfer of energy through a reduction of transmission losses; or
- iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or
- iv) enhanced supply of electricity through the removal of points of congestion.

The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.

7. Managing the environmental effects of transmission

POLICY 2

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

POLICY 3

When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.

POLICY 4

When considering the environmental effects of new transmission infrastructure or major upgrades of existing transmission infrastructure, decision-makers must have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.

POLICY 5

When considering the environmental effects of transmission activities associated with transmission assets, decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

POLICY 6

Substantial upgrades of transmission infrastructure should be used as an opportunity to reduce existing adverse effects of transmission including such effects on sensitive activities where appropriate.

POLICY 7

Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.

POLICY 8

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

POLICY 9

Provisions dealing with electric and magnetic fields associated with the electricity transmission network must be based on the International Commission on Non-ionising Radiation Protection *Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz)* (Health Physics, 1998, 74(4): 494-522) and recommendations from the World Health Organisation monograph *Environment Health Criteria* (No 238, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.

8. Managing the adverse effects of third parties on the transmission network

POLICY 10

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

POLICY 11

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

9. Maps

POLICY 12

Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.

10. Long-term strategic planning for transmission assets

POLICY 13

Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

POLICY 14

Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

Explanatory note

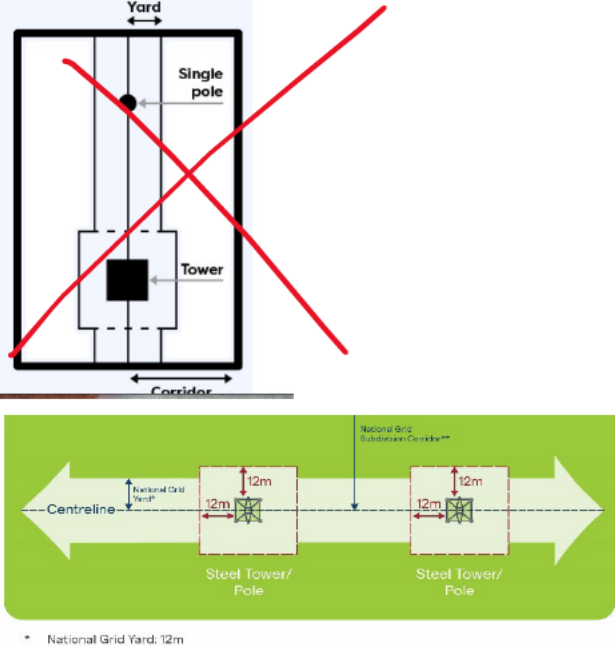
This note is not part of the national policy statement but is intended to indicate its general effect

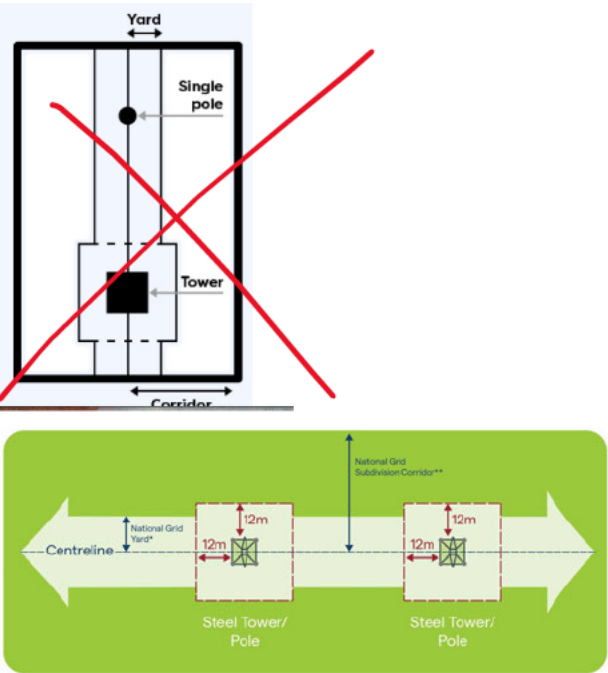
This national policy statement comes into force 28 days after the date of its notification in the *Gazette*. It provides that electricity transmission is a matter of national significance under the Resource Management Act 1991 and prescribes an objective and policies to guide the making of resource management decisions.

The national policy statement requires local authorities to give effect to its provisions in plans made under the Resource Management Act 1991 by initiating a plan change or review within four years of its approval.

Appendix 3. Comments on Specific Provisions

Plan Provisions	Comments	Relief sought
Part 1 – Introduction and General Provisions		
Definitions		
<p>National Grid</p> <p>has the same meaning as in section 3 of the National Policy Statement on Electricity Transmission 2008 (as set out below)</p> <p>means the assets used or owned by Transpower NZ Limited</p>	<p>Transpower supports the proposed definition of <i>national grid</i> because it is consistent with the NPSET.</p>	<p>Retain as drafted</p>
<p>National Grid Subdivision Corridor</p>	<p>The provision of a National Grid Subdivision Corridor definition is supported on the basis that it gives effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the National Grid Yard and National Grid Subdivision Corridor promoted by Transpower for the National Grid.</p> <p>Notwithstanding the support, Transpower submits that minor amendments to the definition text are necessary to:</p> <ul style="list-style-type: none"> • Recognise that only 110kV and 220kV transmission lines on towers traverse the district; and • Improve clarity of interpretation. <p>The replacement of the diagram is also sought to provide clear direction to District Plan users on how the National Grid Subdivision Corridor is to be measured.</p>	<p>Amend as follows:</p> <p><i>National Grid Subdivision Corridor</i></p> <p><i>Means. as depicted in Diagram 1, the area measured either side of the centre line of any above ground electricity transmission line as follows:</i></p> <ul style="list-style-type: none"> a. 14m of a 110kV transmission line on single poles; b. 16m of a 110kV transmission line on pi poles; c. 32m of a 110kV transmission line on towers; d. 37m of a 220kV transmission line on towers. <p><i>The measurement of setback distances from the National Grid transmission lines shall be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</i></p> <p><i>Note: the National Grid Subdivision Corridor does not apply to underground cables or any transmission lines (or sections of line) that are designated.</i></p> <p><i>Diagram 1: National Grid Yard and National Grid Subdivision Corridor.</i></p>

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		 <p>* National Grid Yard: 12m</p>
<p>National Grid Yard</p>	<p>The provision of a National Grid Yard definition is supported on the basis that it gives effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the National Grid Yard and subdivision corridor approach promoted by Transpower for the National Grid.</p> <p>Notwithstanding the support, Transpower submits that minor amendments to the definition text are necessary to improve clarity of interpretation and reflect the nature of support structures within the city.</p> <p>The addition of a diagram is also sought to provide clear direction to District Plan users on how the National Grid Yard is to be measured and reflect the assets in the City.</p>	<p>Amend as follows:</p> <p><i>National Grid Yard</i></p> <p>means as depicted in Diagram 1:</p> <ul style="list-style-type: none"> a. <u>a.</u> the area located within 10m of either side of the centreline of an above ground 110kV electricity transmission line on single poles; b. <u>a.</u> the area located within 12m either side of the centreline of an above ground transmission line on pi poles or towers that is 110kV or greater; <u>and</u> c. <u>b.</u> the area located within 12m in any direction from the outer visible edge of an electricity transmission support structure pole or tower foundation, associated with a line which is 110kV or greater.

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		<p>The measurement of setback distances from <u>the</u> National Grid transmission lines must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</p> <p>Note: the National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.</p> <p>Diagram 1: National Grid Yard and National Grid Corridor.</p> 
<p>National Grid sensitive activity means:</p> <ul style="list-style-type: none"> a. residential activity; b. marae/papakāinga; 	<p>Transpower supports including a definition of <i>National Grid sensitive activities</i> within the District Plan and recognises that the definition gives effect to policies 10 and 11 of the NPSET.</p>	<p>Retain as drafted.</p>

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<ul style="list-style-type: none"> c. hospital; d. healthcare activity; e. educational facility; f. retirement village; g. visitor accommodation activity; or h. place of worship. 		
<p>Specified infrastructure</p> <p>means any of the following:</p> <ul style="list-style-type: none"> a. infrastructure that delivers a service operated by a lifeline utility; b. infrastructure that is recognised as regionally or nationally significant in a National Policy Statement, New Zealand Coastal Policy Statement, regional policy statement or regional plan; c. any public flood control, flood protection, or drainage works carried out; d. by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941; or e. for the purpose of drainage, by drainage districts under the Land Drainage Act 1908 	<p>While the provision of a definition for specified infrastructure is supported, the term does not appear to be used in the draft DP and therefore Transpower queries if it is necessary.</p>	<p>Retain as drafted but review to determine if the definition is needed in the draft DP.</p>
<p>New term: Transmission lines</p>	<p>Throughout the draft DP, the term “transmission lines’ is used (primarily in rules) to assist in plan interpretation, Transpower would support the term being defined as some plan users may not be aware the term applies to the National Grid.</p>	<p>Insert a new definition as follows</p> <p><u>Transmission line</u></p> <p><u>has the same meaning as in section 3 of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 and includes the National Grid (as defined).</u></p>
<p>electricity transmission tower</p> <p>has the same meaning as given in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (as set out below)</p> <p>Means</p>	<p>While the definition is not in itself opposed, it does not appear to be used in the draft DP and therefore Transpower does not consider it needed. Transpower has not sought the term in other district plan reviews.</p>	<p>Delete the definition</p>

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<p>a. a steel-lattice structure that supports conductors as part of a transmission line; and</p> <p>b. includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations</p>		
Part 2 – District Wide Matters		
Strategic Direction		
Introduction	<p>Transpower suggests the Strategic Direction section could benefit from some introductory text to explain/guide the relationship between the strategic direction themselves, as well as other provisions in the plan, and when they are to be considered.</p> <p>Transpower supports a statement to clarify there is no hierarchy between the objectives.</p>	Provide introductory text to the Strategic Directions
<p>INF-O3</p> <p>National and Regional Significance</p> <p>Infrastructure of national and regional significance is supported and protected.</p>	<p>While Transpower supports INF-O3, it seeks amendment to include 'recognised and provided for' to give effect to the NPSET. The term 'supported' is not widely used or understood within context of the objective. It is also not clear what infrastructure constitutes 'national or regional importance' given the terms are not defined.</p> <p>As an alternative, Transpower would support a National Grid specific strategic direction as outlined below.</p>	<p>Amend as follows:</p> <p>INF-O3</p> <p><i>National and Regional Significance</i></p> <p><i>Infrastructure of national and regional significance is supported and protected, <u>recognised and provided for.</u></i></p>
New National Grid specific strategic direction	<p>Transpower supports the provision of a new strategic objective specific to the National Grid on the basis it gives effect to the NPSET and provides specific recognition in the draft DP of the national significance of the National Grid.</p>	<p>Insert a new SD as follows:</p> <p><u>INF-O6: National Grid</u></p> <p><u>The significance of the National Grid is recognised, and sustainable, secure and efficient electricity transmission is provided through and within the city</u></p>
New specific strategic direction relating to the effects on significant infrastructure	<p>Transpower supports the provision of a new strategic objective specific to the effects of activities on significant infrastructure on the basis it gives effect to the NPSET and provides specific direction on the 'protection' reference within INF-O3.</p>	<p>Insert a new SD as follows:</p> <p><u>INF-O7: Effects on Significant infrastructure</u></p> <p><u>Infrastructure of national and regional significance (which includes the National Grid), operates efficiently and safely and is protected from incompatible development and activities that may compromise the operation, maintenance and upgrade of</u></p>

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		<u>significant infrastructure, and may create reverse sensitivity effects</u>
Energy, Infrastructure and Transpower – Infrastructure		
General comment – Introduction	<p>Transpower supports the provision of an Infrastructure chapter, noting it contains the majority of the Grid Specific provisions (excluding Earthwork activities within the National Grid Yard which is addressed in the Earthworks chapter, and subdivision within the National Grid Subdivision Corridor which is addressed in the Subdivision Chapter).</p> <p>While the chapter is supported, Transpower requests that the chapter be standalone and that this be made explicitly clear within the introduction to the chapter.</p> <p>Transpower notes INF-P11 provides policy direction for overlay areas (being SCHEDX - Outstanding Natural Features and Landscapes, SCHEDX - Coastal High Natural Character Areas, SCHEDX - Significant Natural Areas, SCHEDX - Special Amenity Landscapes and Open Space and Recreation Zone) and therefore Transpower assumes the intent the Infrastructure Chapter is stand alone in respect of managing the effects of the National Grid.</p> <p>This is also reflected in the notes to the Rules in the Natural Features and Landscapes chapter “The policies, rules and standards for Infrastructure within ONFL are located in the INF (INF-NFL) chapter.” A similar clause is provided in the Coastal Environment chapter, Natural Character Chapter, and Earthworks Chapter. Transpower submits a clear statement in the Infrastructure chapter would benefit plan users.</p>	<p>Include the following into the introduction</p> <p><u>The infrastructure provisions in the District Plan provide for the establishment, operation, maintenance and upgrading of infrastructure throughout the city while managing their adverse effects on the environment (particularly in sensitive environments such as the coastal environment, outstanding and significant landscapes, significant natural areas, areas containing cultural or historic heritage values, and areas subject to natural hazards). As many infrastructure assets are lineal and traverse many parts of the district, it is considered appropriate that a single set of rules, objectives and policies be provided that apply to Infrastructure across the City. As such, the Infrastructure chapter is stand alone as it applies to Infrastructure and Network Utility Operators and provisions in the following chapters do not apply.</u></p> <ul style="list-style-type: none"> - <u>Historic and Cultural Values</u> - <u>Natural Environment Values</u> - <u>Coastal Environment</u> - <u>Earthworks Chapter</u> - <u>Zones</u> <p><u>Provisions to manage the effects of activities and land use on the National Grid are contained in the Infrastructure Chapter, with the effects of earthwork activities on the National Grid managed within the Earthworks chapter, and subdivision within the National Grid Subdivision Corridor managed in the Subdivision Chapter.</u></p>
INF-O1 Benefits of infrastructure The national, regional and local benefits of infrastructure are recognised and provided for.	Transpower supports the objective. While the objective is not specific to the National Grid, the reference to ‘recognised and provided for’ gives effect to the NPSET.	Retain the objective.
INF-O2 Adverse effects of infrastructure	Transpower supports the objective.	Retain the objective.

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The adverse effects of Infrastructure on the environment are managed while recognising the functional and operational needs of infrastructure.		
INF-O3 Adverse effects on infrastructure The adverse effects of subdivision, use and development on the function and operation of infrastructure are managed.	Transpower supports the intent of the objective but seeks amendment to clearly articulate that in some circumstances the adverse effects should be avoided. This would reflect the strong policy directive within INF-P6.	Amend the objective as follows: <i>INF-O3 Adverse effects on infrastructure</i> <i>The adverse effects of subdivision, use and development on the function and operation of infrastructure are managed, <u>and in some circumstances avoided.</u></i>
New Objective	Notwithstanding the support for the above objectives, in order to give effect to the NPSET, Transpower supports the provision of a new objective specific to the National Grid.	Insert a new objective as follows: <i>INF-OXX National Grid</i> <i>The National Grid is protected, developed, operated, maintained, and upgraded in a manner that:</i> <ol style="list-style-type: none"> 1. <i><u>Recognises and provides for its national significance;</u></i> 2. <i><u>Secures the resilience of the National Grid, including in relation to the effects of climate change;</u></i> 3. <i><u>Meets the needs of present and future generations, including by increasing transmission capacity over time;</u></i> 4. <i><u>Recognises and provides for the role of the National Grid in achieving New Zealand's emissions reduction targets, emissions budgets, energy targets, and associated commitments under any emissions reduction plan, while managing the:</u></i> <ol style="list-style-type: none"> a. <i><u>Adverse effects of the National Grid on the environment; and</u></i> b. <i><u>Adverse effects of other activities on the National Grid</u></i>
INF-P1 Recognise benefits of infrastructure Recognise the social, economic, cultural and environmental benefits that infrastructure provides including: <ol style="list-style-type: none"> 1. Enabling enhancement of the quality of life and standard of living for people and communities; 2. Providing for public health and safety; 3. Enabling businesses to function; 	Transpower supports the policy directive to recognise benefits. Notwithstanding the policy is not specific to the National Grid, the recognition give effect to NPSET Policy 1.	Retain the policy

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<ul style="list-style-type: none"> 4. Enabling growth and development; 5. Enabling the transportation of freight, goods and people; and 6. Providing a lifeline during emergencies 		
<p>INF-P2 Provide for infrastructure</p> <p>Provide for infrastructure by:</p> <ul style="list-style-type: none"> 1. Enabling the safe, resilient, effective and efficient operation, maintenance, repair, minor upgrade or removal of existing infrastructure; 2. Enabling investigation, monitoring and navigation activities associated with infrastructure operations; and 3. Providing for significant upgrades to, and the development of new infrastructure. 	<p>Transpower supports the policy directive to provide for infrastructure. While the policy is not specific to the National Grid, it gives effect to NPSET Policy 2 and Policy 5.</p> <p>Transpower would also support the provision of a new policy based on clause 1, specific to the National Grid.</p>	<p>Retain the policy</p>
<p>INF-P3 Coordinate provision of infrastructure</p> <p>Enable the efficient coordination of infrastructure planning and delivery by:</p> <ul style="list-style-type: none"> 1. Ensuring provision and development of infrastructure is integrated with other land use, subdivision, development and urban growth. 2. Ensuring that infrastructure is resilient to impacts of natural hazards and climate change. 3. Encouraging the co-location of infrastructure, including the utilisation of existing designations and the use of roads as infrastructure corridors. 4. Ensuring the provision and operation of infrastructure that cross jurisdictional boundaries is managed in an integrated manner. 	<p>Transpower supports the policy, in particular the 'encourage' element in clause 3., and the integrated directive within clause 4.</p>	<p>Retain the policy</p>
<p>INF-P4 Adverse effects of infrastructure</p> <p>Manage the adverse effects of upgrades to, or the development of new infrastructure, including effects on:</p> <ul style="list-style-type: none"> 1. Natural and physical resources; 2. Amenity values; 3. Sensitive activities; 4. Natural hazard risk; 	<p>Policy INF-P4 is general in nature in that it provides a 'manage' directive within context of a range of effects. The policy directive is supported.</p>	<p>Retain the policy.</p>

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<p>5. The identified values of areas within overlays of the District Plan;</p> <p>6. The safe and efficient operation of other infrastructure; and</p> <p>7. The health, well-being and safety of people and communities.</p>		
<p>INF-P5 Consideration of the adverse effects of infrastructure</p> <p>When considering the adverse effects of infrastructure on the environment recognise that there may be situations where all adverse effects, including construction effects, cannot be avoided, and as such must be remedied or mitigated through having regard to the following:</p> <ol style="list-style-type: none"> 1. The extent to which adverse effects can be avoided, remedied or mitigated may be constrained by the functional or operational need of the infrastructure; 2. The necessity for the infrastructure to be in that location given the functional or operation need of the infrastructure, and the consideration of alternative locations; 3. The time, duration and frequency of adverse effects; 4. The necessity of the infrastructure including: <ol style="list-style-type: none"> a. The need to quickly repair and restore disrupted services; b. The impact of not operating, repairing, maintaining, upgrading, removing or developing infrastructure; and c. The adverse effects on the environment which may result where infrastructure needs are not adequately met. 5. Existing infrastructure, including: <ol style="list-style-type: none"> a. The complexity and connectedness of networks and services; and b. The potential for co-location and shared use of infrastructure corridors; 6. Anticipated outcomes for the receiving environment and the degree to which past modifications have compromised the achievement of those outcomes; 7. The benefits derived from the infrastructure at a local, regional and national scale; and 	<p>While not National Grid specific, Transpower supports the policy consideration matters for assessing the adverse effects of infrastructure.</p>	<p>Retain the policy, but as a minor correction, amend 'operation' to 'operational' within clause 2.</p>

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<p>8. The extent to which the infrastructure is integrated with, and necessary to support, planned urban development.</p>		
<p>INF-P6 Adverse effects on infrastructure</p> <p>Manage the effects on infrastructure from subdivision, land use and development, including by:</p> <ol style="list-style-type: none"> 1. Avoiding the incompatible establishment of, or changes to, sensitive activities and incompatible buildings and structures within a defined National Grid Yard. 2. Avoiding the incompatible establishment of, or changes to, sensitive activities and incompatible buildings and structures within a defined Gas Transmission Pipeline Corridor. 3. Controlling subdivision within a defined National Grid Yard and Gas Transmission Pipeline Corridor. 	<p>While Transpower supports the provision of a policy to address the effects of activities on the National Grid, it has concerns that the policy wording in is not sufficiently clear to give effect to the NPSET (in that it does not reference reverse sensitivity or activities that may compromise the National Grid – as required by Policy 10 of the NPSET), and that the policy also applies to the Gas Transmission Pipeline Corridor which is not provided for in the NPSET.</p> <p>Transpower's preference is to provide a separate National Grid specific policy to give effect to the NPSET (and specifically policies 10 and 11). NPSET Policies 10 and 11 are to be read together and reflect the National Grid corridor management approach supported by Transpower throughout NZ.</p> <p>Transpower can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines. In addition to reverse sensitivity effects, subdivision, land use and development can also compromise the National Grid through activities such as access to the National Grid assets being blocked, buildings and structures being located close to assets and causing risk and safety issues (such as flashovers) or the location of buildings and activities, including 'sensitive activities' such as schools and residential properties, beneath or in close proximity to lines and/or structures can limit Transpower's ability to maintain, upgrade and develop the National Grid.</p> <p>It is noted the policy includes reference to subdivision. On the basis the subdivision provisions are contained within the Subdivision Chapter and the provision of policy SUB-P25 which is specific to Subdivision within the National Grid Subdivision</p>	<p>Amend the policy INF-P6 as follows and provide a new National Grid specific policy.</p> <p>INF-P6 Adverse effects on infrastructure</p> <p>Manage the effects on infrastructure from subdivision, land use and development, including by:</p> <ol style="list-style-type: none"> 1. Avoiding the incompatible establishment of, or changes to, sensitive activities and incompatible buildings and structures within a defined National Grid Yard. 2. Avoiding the incompatible establishment of, or changes to, sensitive activities and incompatible buildings and structures within a defined Gas Transmission Pipeline Corridor. 3. Controlling subdivision within a defined National Grid Yard and Gas Transmission Pipeline Corridor. <p>Insert a new National Grid specific policy as follows:</p> <p><u>Adverse effects on the National Grid</u></p> <p><u>Protect the safe and efficient operation, maintenance and repair, upgrading and development of the National Grid from adverse effects by:</u></p> <ol style="list-style-type: none"> <u>1. Avoiding land uses (including sensitive activities and any increase in their scale and intensity) and buildings and structures within the National Grid Yard that may directly affect or otherwise compromise the National Grid;</u> <u>2. Avoiding reverse sensitivity effects on the National Grid; and</u> <u>3. Maintaining ongoing access to National Grid conductors and support structures for maintenance and upgrading works; and</u>

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	<p>Corridor, Transpower has not sought reference to subdivision within the proposed National Grid Yard specific policy. ‘</p> <p>It is also noted that earthworks within the National Grid Yard are addressed within the Earthworks chapter and policy EW-P14 is specific to the National Grid.</p> <p>Based on the above, Transpower supports a specific National Grid policy.</p>	<p>4. <u>Achieving compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).</u></p>
<p>INF-P7 Undergrounding of infrastructure</p> <p>Encourage the undergrounding of new infrastructure in urban areas where it is practicable and technically feasible</p>	<p>Transpower supports the ‘encourage’ directive within the policy, noting that there are many reasons why the undergrounding of National Grid assets may not be appropriate.</p>	<p>Retain the policy.</p>
<p>INF-P11 Upgrading and developing the National Grid</p> <p>Provide for the upgrade and development of the National Grid, while:</p> <ol style="list-style-type: none"> 1. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated; 2. Minimising adverse effects on urban amenity in urban areas; 3. Avoiding adverse effects on the City Centre Zone, Open Space and Recreation Zones and existing sensitive activities; 4. Seeking to avoid adverse effects on areas identified in SCHEDX - Outstanding Natural Features and Landscapes, SCHEDX - Coastal High Natural Character Areas, SCHEDX - Significant Natural Areas, SCHEDX - Special Amenity Landscapes and Open Space and Recreation Zones; and 5. Considering opportunities to reduce existing adverse effects of the National Grid as part of any substantial upgrade 	<p>The NPSET recognises the national significance of the National Grid and provides a suite of specific policies which are required to be given effect to in the district plan. Associated with the development of National Grid assets is the potential for adverse environmental effects. The development of the National Grid must therefore be managed to ensure that the potential for adverse effects is appropriately managed while recognising the significance of the National Grid and the constraints under which it operates. The NPSET requires the District Plan to include objectives and policies that:</p> <ul style="list-style-type: none"> • Allow for the consideration of technical constraints and operational requirements under which the National Grid operates e.g. the linear nature of the transmission lines. • Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site, and method selection process. • Ensure planning and development of the National Grid has regard to the existing environment. <p>This policy direction within the NPSET sets an appropriate assessment framework for National Grid infrastructure. The above means that policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and</p>	<p>Amend the policy as follows:</p> <p>INF-P11 <u>Major</u> Upgrading and developing the National Grid</p> <p>Provide for the <u>major</u> upgrading and development of the National Grid, while:</p> <ol style="list-style-type: none"> 1. <u>When considering</u> Having regard to the extent to which adverse effects have been avoided, remedied or mitigated, <u>having regard to</u>; <ol style="list-style-type: none"> a. the constraints imposed by locational, technical and operational requirements of the National Grid; and b. the extent to which effects have been avoided, remedied or mitigated by the route, site and method selection. 2. <u>Within urban areas, development of the National Grid should minimising minimise</u> adverse effects on urban amenity in urban areas; 3. <u>Within urban areas, when developing the National Grid,</u> Avoiding adverse effects on the City Centre Zone, Open Space and Recreation Zones and existing sensitive activities; 4. <u>Within rural areas, when developing the National Grid,</u> Seeking to avoid adverse effects on areas identified in SCHEDX - Outstanding Natural Features and Landscapes, SCHEDX - Coastal High Natural Character Areas, SCHEDX - Significant Natural Areas,

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	<p>method selection process when considering the adverse effects of new National Grid infrastructure on the environment.</p> <p>It is Transpower's experience that a standalone policy is the most efficient way to give effect to the NPSET and provisions of a specific policy for the National Grid is consistent with the approach sought and adopted across other district (and regional) plans across the country. In this context, Policy NU-P11 is supported in principle. While Policies NU-P2 and NU-P4 provide a policy framework for addressing the effects of network utilities, they do not give effect to the NPSET in terms of recognising the clear policy directives in respect of the National Grid.</p> <p>Notwithstanding its general support for the specific National Grid effects policy NU-P11, amendments are sought to the policy as follows:</p> <ul style="list-style-type: none"> - Confine the policy to major upgrades as opposed to all upgrades. - Confine some of the clauses to 'development of the National Grid' recognising that existing assets are constrained in terms of the ability to avoid, remedy or mitigate adverse effects. - Amendment to Clause 1. to give effect to NPSET Policies 3 and 4, when considering the effects of the major upgrade and development of the National Grid. All the NPSET policies are to be read together and therefore NPSET policies 3 and 4 are relevant considerations for all major upgrading and development, including within context of NPSET policies 6, 7 and 8. - Amendment to clause 2. to recognise the 'should' directive within NPSET policy 7, and giving effect to other NPSET policies. - Amendment to clause 3. to remove reference to 'open space and recreation zones'. Clause 3 gives effect to NPSET Policy 7 and is confined to urban areas. The areas of 'high recreational value and amenity' as referred to in Policy 7 are not defined. Transpower's interpretation of NPSET Policy 7 is that the 	<p>and SCHEDXX Sites of Significance to Maori SCHEDXX - Special Amenity Landscapes and Open Space and Recreation Zones; and</p> <p><u>4a. e. Where the National Grid has a functional or operational need to locate within the Coastal Environment, manage adverse effects of the development of the National Grid by:</u></p> <ul style="list-style-type: none"> <u>i. Seeking to avoid adverse effects on areas and values identified in SCHEDXX - Outstanding Natural Features and Landscapes, SCHEDXX - Coastal High Natural Character Areas, SCHEDXX - Significant Natural Areas, and SCHEDXX Sites of Significance to Maori, and where it is not practicable to avoid, to remedy or mitigate;</u> <u>ii. Where it is not practicable to avoid adverse effects on the values of the areas identified in clause e.i. because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</u> <u>iii. Seeking to avoid significant adverse effects on:</u> <ul style="list-style-type: none"> <u>- other areas of natural character</u> <u>- natural attributes and character of other natural features and natural landscapes</u> <u>- indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010.</u> <p>5. <u>Where appropriate, considering opportunities to reduce existing adverse effects of the National Grid as part of any substantial upgrade;</u></p> <p>6. <u>Remedy or mitigate any adverse effects from the major upgrade or development of the National Grid which cannot be avoided, to the extent practicable; and</u></p> <p><u>In the event of any conflict with any other policies within the Plan, Policy NU-P11 takes precedence.</u></p>

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	<p>intent is not to capture all recreation zones, rather those of high value. Within the Hutt City context, this would be ONFL, none of which are within urban areas and therefore not captured by NPSET policy 7.</p> <ul style="list-style-type: none"> - Amendment to Clause 4. to confine the policy to rural areas to give effect to NPSET policy 8, and amendment to the scheduled references to reflect those schedules anticipated to form part of the PDP. - Insertion of a new clause 4A. that applies to the coastal environment, thereby reconciling the NPSET and NZCPS. Outside the Coastal Environment, such a directive is not appropriate in context of the NPSET. - Amendment to Clause 5. to include 'where appropriate' to reflect the wording in NPSET Policy 6. - Insertion of a new clause 6. to provide a catch all requirement to remedy or mitigate other adverse effects. - Recognising that there may be potential for some conflict between this policy and others in the Plan. Transpower seeks insertion of a note to this policy to make it clear that this policy takes precedence, reflecting the national, regional and local significance of the National Grid 	
<p>INF-P12 Technological advances</p> <p>Provide flexibility to adopt new technologies for infrastructure that:</p> <ol style="list-style-type: none"> 1. Allow for the re-use of redundant services and structures; 2. Increase resilience, safety or reliability of networks and services; 3. Facilitate a transition to renewable energies; 4. Result in environmental benefits or enhancements; or 5. Promote environmentally sustainable outcomes. 	<p>Transpower supports the policy but suggests it could be amended to recognise activities which are for the purpose of mitigating climate change effects.</p>	<p>Amend the policy to recognise activities which are for the purpose of mitigating climate change effects.</p>

Plan Provisions	Comments	Relief sought
<p>INF-P13 New or upgraded infrastructure in natural hazard overlays</p> <p>Provide for new or upgraded infrastructure in natural hazard overlays where:</p> <ol style="list-style-type: none"> 1. There is a functional or operational need for the infrastructure to be in that location; 2. Related building, structures or earthworks are of a scale and design that do not significantly increase natural hazard risk in Overland Flow and Stream Corridors. 3. Increases in natural hazard risk in identified high hazard areas and the Overland Flow Overlay are avoided. 	<p>Transpower supports the policy relating to infrastructure within hazard areas.</p>	<p>Retain the policy. A minor correction is sought to insert a 's' onto building within clause 2.</p>
<p>INF-P14 New or upgraded infrastructure in coastal or riparian margins</p> <p>INF-P15 New or upgraded infrastructure in coastal character overlays</p> <p>INF-P16 New or upgraded infrastructure in Outstanding Natural Features and Outstanding Natural Landscapes</p> <p>INF-P17 New or upgraded infrastructure in other overlays</p> <p>INF-P18 New or upgraded infrastructure in other overlays</p>	<p>On the basis Policy INF-P11 provides a specific policy framework for major upgrades and new infrastructure within the overlays, Transpower considers policies INF-P14 – P18 have limited relevance to the National Grid.</p> <p>It is noted that the Natural Features and Landscapes Chapter, Natural Character Chapter, Coastal Environment Chapter, states the objectives, policies and rules in those chapters do not apply to Infrastructure. It is not clear as to the relationship to the further SASM rules, and the future SNA chapter.</p> <p>Transpower would support wording to clarify the relationship (as is provided in the suggested amendment to INF-P11).</p>	<p>Retain the policies on the basis they are not applicable to the National Grid.</p>
<p>Rules</p> <p>For the most part, the rules of this chapter override all rules in area-specific and other district-wide chapters. However, the rules of this chapter do not include:</p> <ol style="list-style-type: none"> a. ... b. c. Rules and standards controlling subdivision within the National Grid Corridor (located in the Subdivision chapter). d. 	<p>Transpower supports the clarification as to the relationship between rules within the Infrastructure chapter and rules in other chapters. However, an amendment is sought to also reference that Earthworks within the National Grid Yard are managed within the Earthworks Chapter.</p>	<p>Amend the overview to the rules as follows:</p> <p><i>For the most part, the rules of this chapter override all rules in area-specific and other district-wide chapters. However, the rules of this chapter do not include:</i></p> <ol style="list-style-type: none"> a. ... c. Rules and standards controlling subdivision within the National Grid <u>Subdivision</u> Corridor (located in the Subdivision chapter).

Plan Provisions	Comments	Relief sought
		<i>f. <u>Rules and standards controlling earthworks within the National Grid Yard (located in the Earthworks chapter).</u></i>
Rules INF-R1, INF-R2, INF-R3	The rules INF-R1, R2 and R3 are supported, noting they are not relevant to the National Grid given the operation, maintenance and upgrade of the National Grid is managed and regulated by the NESETA.	Retain as notified
INF-R12 New above ground lines including associated support structures, excluding transmission lines over 110kV (not regulated by the NESTF or NESETA)	Transpower opposes the reference to the NESETA as the regulation does not relate to new above ground lines (notwithstanding the rule does not apply to transmission lines over 110kV.)	Amend as follows: <i>INF-R12 New above ground lines including associated support structures, excluding transmission lines over 110kV (not regulated by the NESTF or NESETA)</i>
INF-R13 New above ground lines including associated support structures, that convey electricity over 110kV or above	Transpower opposes the default non-complying activity status for new lines over 110kV within <ul style="list-style-type: none"> – Active Frontage Overlay, the Historic Heritage Area or a site with a scheduled heritage building, or within the extent of any scheduled site or area of significance to Māori; – High Hazard Area; and – Coastal Natural Character Area or an Outstanding Natural Feature or Landscape. – And the zones being Open space and Recreation Zones; City Centre Zone; Metropolitan Centre Zone; and Local Centre Zone. <p>The non-complying activity status does not give effect to the NPSET or the policy directive of INF-P11.</p>	Amend the default activity to make the default activity status discretionary at worse <u>worst</u> .
INF-R14 Upgrading of transmission lines above 110kV (not regulated by the NESETA)	The upgrading of existing transmission lines within the city are regulated by the NESETA. As such the rule is not required.	Delete Rule INF-R14.
INF-R17	Transpower opposes the default non-complying activity status for substations within	Amend the default activity to make the default activity status discretionary at worse <u>worst</u> .

Plan Provisions	Comments	Relief sought
New substations, transformers, switching stations and ancillary buildings for the electricity network not contained in a cabinet	<p>– Coastal Natural Character Area or an Outstanding Natural Feature or Landscape.</p> <p>The non-complying activity status does not give effect to the NPSET or the policy directive of INF-P11.</p>	
INF-R24 Infrastructure not otherwise provided for or subject to any other rule in this table	<p>Rule INF-R24 is the default rule and would capture new underground transmission lines.</p> <p>Transpower opposes the default non-complying activity status within Coastal Natural Character Area or an Outstanding Natural Feature or Landscape.</p> <p>The non-complying activity status does not give effect to the NPSET or the policy directive of INF-P11.</p>	<p>Specific to the National Grid, amend the default activity to make the default activity status discretionary at were worst.</p>
INF-R25 Activities in the National Grid Yard All Zones 1. Activity status: Permitted Where: a. The activity is not a National Grid sensitive activity; All Zones 2. Activity status: Non-complying Where: Compliance with INF-R25.1 not achieved with:	<p>Transpower supports the rule specific to sensitive activities within the National Grid Yard, noting Rule INF-R26 is specific to the associated structures and buildings.</p> <p>Existing use rights would apply to existing sensitive activities within the National Grid Yard.</p>	<p>Retain the rule.</p>
INF-R26 Buildings and structures, including additions and alterations to existing buildings/structures, in the National Grid Yard All Zones 1. Activity status: Permitted Where: a. The building or structure is a non-habitable farm or horticulture structure or building or a stockyard; b. The building or structure is a fence that is no greater than 2.5m in height and is located no closer than:	<p>Transpower supports INF-R26 on the basis it gives effect to Policy 10 and Policy 11 of the NPSET.</p> <p>In addition to the health and safety issues of activities locating within proximity of the National Grid, the National Grid can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines. Access to support structures can also be compromised, thereby affecting Transpower's ability to</p>	<p>Amend the rule as follows: INF-R26 Buildings and structures, including additions and alterations to existing buildings/structures, in the National Grid Yard All Zones 1. Activity status: Permitted Where: a. The building or structure is a non-habitable farm or horticulture structure or building or a stockyard; b. The building or structure is a fence that is no greater than 2.5m in height and is located no closer than:</p>

Plan Provisions	Comments	Relief sought
<p>i. 6m from the outer visible edge of a foundation of a National Grid transmission line tower; or</p> <p>ii. 5m from the outer visible edge of a foundation of a National Grid transmission line pole; or</p> <p>c. The building or structure is an accessory building that is associated with an existing residential activity and is less than 10m² in area and 2.5m in height; and</p> <p>d. Any alterations to an existing building or structure that is used for a sensitive activity do not increase the building or structure height or footprint.</p> <p>Note: Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) is mandatory under the Electricity Act 1992. All activities regulated by NZECP34:2001, including buildings, structures, earthworks and the operation of mobile plant, must comply with that regulation. Activities should be checked for compliance even if they are permitted by the District Plan.</p> <p>All Zones</p> <p>2. Activity status: Non-complying</p> <p>Where: Compliance is not achieved with INF-R26.1.a, INF-R26.1.b, INF-R26.1.c, INF-R26.1.d or INF-R26.1.e.</p>	<p>operate and maintain the assets as well as respond to any emergency situations.</p> <p>The provisions sought in relation to the National Grid Yard are intended to allow for the reasonable use of land inside the transmission line corridor, with standards and rules imposed to ensure that any land use and development that might compromise the National Grid is either managed or avoided.</p> <p>Specific to the 12 m 'National Grid Yard', Transpower is satisfied that there are some activities within the National Grid Yard that will not significantly compromise the operation, maintenance or any upgrade of the network, due to their nature and small scale. Certain structures (such as rural hay barns, pump sheds and implement sheds) are less problematic within 12 m of the line (noting that they will still need to be set back 12 m from National Grid support structures and meet mandatory safety clearances stipulated in other regulations) on the basis they are unlikely to "build out" a transmission line. The access to or use of these structures can be restricted without causing animal welfare or business disruption issues, and they do not introduce intensive uses or heavily frequented workplaces with long durations of exposure to risk. Conversely, examples of development that should be avoided within the National Grid Yard include commercial buildings and intensive uses/development, dairy sheds, piggeries, poultry sheds, and commercial greenhouses. The location of buildings and activities beneath or in close proximity to lines and/or structures can also compromise Transpower's ability to maintain, upgrade and develop the National Grid. Additionally, the stability of National Grid lines can be affected by earthworks that destabilise support structures resulting in their need to be relocated.</p> <p>Of particular relevance in terms of the effects of activities on the National Grid are NPSET Policies 10 and 11. These policies act as the primary guide to inform how adverse effects on the National Grid are managed. The policies seek to:</p> <ul style="list-style-type: none"> - Avoid sensitive activities near electricity transmission lines and infrastructure; 	<p>i. 6m from the outer visible edge of a foundation of a National Grid transmission line tower; or</p> <p>ii. 5m from the outer visible edge of a foundation of a National Grid transmission line pole; or</p> <p>c. The building or structure is an accessory building that is associated with an existing residential activity and is less than 10m² in area and 2.5m in height; and</p> <p>d. Any alterations to an existing building or structure that is used for a <u>National Grid</u> sensitive activity do not increase the building or structure height or footprint.</p> <p>e. <u>Network utilities as defined in section 166 of the RMA or any part of electricity generation that connects to the National Grid</u></p> <p>2. <u>All buildings, structures and activities permitted by INF-R26</u></p> <p><u>1. above must:</u></p> <p>a. <u>meet the electrical distances required by NZECP 34: 2001 under all transmission line and building operation conditions.</u></p> <p>b. <u>not permanently physically impede vehicular access to a National Grid support structure; and</u></p> <p>c. <u>be located at least 12 m from the outer visible edge of a foundation of a National Grid transmission line support structure, except where it:</u></p> <p><u>i. is a network utility or any part of electricity infrastructure that connects to the National Grid;</u></p> <p><u>ii. is a fence not exceeding 2.5 m in height that is located at least 6 m from the outer visible edge of a foundation of a National Grid transmission line tower</u></p> <p><u>iii. A building or structure where Transpower has given written approval in accordance with clause 2.4.1 of NZECP34: 2001.</u></p> <p>Note: Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) is mandatory under the Electricity Act 1992. All activities regulated by</p>

Plan Provisions	Comments	Relief sought
	<ul style="list-style-type: none"> - Manage other activities to avoid reverse sensitivity effects on the Grid; and - Manage activities to ensure the operation, maintenance, upgrading and development of the Grid is not compromised. <p>The default non complying status is supported. Policy 10 contains the phrase 'avoid reverse sensitivity effects' and 'to ensure that the operation, maintenance, upgrading and development of the electricity transmission network is not compromised'. The use of the words 'avoid' and 'ensure' provide a strong direction that can only be achieved by way of a non-complying activity status.</p> <p>Notwithstanding the support for the rule, amendments are sought as follows:</p> <ul style="list-style-type: none"> - To provide for network utilities - To impose standards relating to access, conductor clearance distances and setback from support structures. - Provision of a clear suite of non-complying activities. 	<p>NZEC34:2001, including buildings, structures, earthworks and the operation of mobile plant, must comply with that regulation. Activities should be checked for compliance even if they are permitted by the District Plan.</p> <p>All Zones</p> <p>3. 2-Activity status: Non-complying</p> <p>Where:</p> <ul style="list-style-type: none"> a. Compliance is not achieved with INF-R26.1. and 2a, INF R26.1.b, INF R26.1.c, INF R26.1.d or INF R26.1.e. b. <u>Establishing National Grid sensitive activities in an existing building or a new building</u> c. <u>Alterations and additions to an existing building or structure for a sensitive activity that involves an increase in the building height or footprint.</u> d. <u>Wintering barns, Commercial greenhouses, Immoveable protective canopies, Produce packing facilities, Milking sheds</u> e. <u>Buildings or structures for the handling or storage of Class 1-4 hazardous substances with explosive or flammable intrinsic properties (except that this does not apply to the accessory use and storage of hazardous substances in domestic scale quantities)</u> f. <u>Any building or structure not otherwise provided for.</u>
Hazards and Risks		
General point	<p>Having reviewed the Infrastructure chapter, Transpower assumes the Natural Hazards chapter does not apply to network utilities (as there are policies and rules within the Infrastructure Chapter).</p> <p>Transpower requests the chapter relationship be clarified and a specific statement be inserted as to whether the Hazards chapter applies to the network utilities (and specifically the National Grid).</p>	The relevance and applicability of the Natural Hazards Chapter to network utilities (and specifically the National Grid) be clarified.
Policy NH-P1 Risk-Based Approach	Depending on the relevance and applicability of the chapter to the National Grid, Transpower supports the policy recognition for the operational need or functional need for some activities to	Retain the policy

Plan Provisions	Comments	Relief sought
<p>Identify natural hazards and coastal hazards within the District Plan and take a risk-based approach to the management of subdivision, use and development based on:</p> <ol style="list-style-type: none"> 1. The sensitivity of the activities to the impacts of natural hazards; 2. The hazard posed to people's lives and wellbeing, property and infrastructure, by considering the likelihood and consequences of natural hazard events; and 3. The operational need or functional need for some activities to locate in Natural Hazard Overlays. 	<p>locate in Natural Hazard Overlays. Given the linear nature of the Grid and operational constraints, it is not always possible to locate new, or relocate existing grid assets outside hazard areas.</p>	
<p>General Comment - Natural Hazard Rules</p>	<p>Depending on the relevance and applicability of the chapter to the National Grid, as currently drafted the Natural Hazards Chapter contains numerous rules for additions, conversions and new building and structures. There are three categories of activities managed by the rules being:</p> <p><i>LESS HAZARD SENSITIVE means the following land use activities:</i></p> <ol style="list-style-type: none"> a. accessory buildings used for non-habitable purposes b. buildings associated with marina operations (above MHWS) c. passive recreation d. parks facilities e. plantation forest or plantation forestry. <p><i>POTENTIALLY HAZARD SENSITIVE ACTIVITIES means the following land use activities:</i></p> <ol style="list-style-type: none"> a. active recreation activities b. buildings associated with primary production (excluding residential units, minor residential units, residential activities or buildings identified as less hazard sensitive activities) c. commercial activity d. conservation activity e. cultivation f. customary activity 	<p>Clarify how network utilities are provided for within the rule framework. It appears the National Grid is not captured by the listed rules. Transpower requests clarification on this matter. In terms of activity status, Transpower would support an activity status that recognises existing assets and provides for their operation, maintenance and upgrade, with new National Grid assets having an activity status that is no more onerous than restricted discretionary or discretionary.</p>

Plan Provisions	Comments	Relief sought
	<p>g. customary harvesting</p> <p>h. entertainment facility</p> <p>i. food and beverage activity</p> <p>j. industrial activity</p> <p>k. major sports facility</p> <p>l. offices</p> <p>m. sports facilities</p> <p>n. park facilities</p> <p>o. primary production</p> <p>p. quarrying activities</p> <p>q. rural activity</p> <p>r. rural industry.</p> <p>HAZARD SENSITIVE ACTIVITIES means the following land use activities:</p> <p>a. childcare services</p> <p>b. community facility</p> <p>c. educational facility</p> <p>d. emergency services facilities</p> <p>e. hazardous facilities and major hazardous facilities</p> <p>f. healthcare facility</p> <p>g. hospital</p> <p>h. marae</p> <p>i. multi-unit housing</p> <p>j. places of worship</p> <p>k. residential units and minor residential units (including those associated with papakāinga)</p> <p>l. retirement village</p> <p>m. visitor accommodation.</p> <p>Transpower has existing assets within the Fault Hazard Overlays (both the Fault Hazard Overlay and the Fault induced subsidence areas), the Coastal (Medium) Inundation Overlay, the Flood Hazard Overlay (within the Stream corridor, Overland flow (path and Induction area), the Liquefaction Hazard Overlay, and the Tsunami Hazard Overlay (Medium and Low Coastal Tsunami hazard).</p>	

Plan Provisions	Comments	Relief sought
	Transpower is not opposed to the framework of rules but seeks clarification as to how network utilities are provided for within the rule framework. It appears the National Grid is not captured by the above rules. Transpower requests clarification on this matter. In terms of activity status, Transpower would support an activity status that recognises existing assets and provides for their operation, maintenance and upgrade, with new National Grid assets having an activity status that is no more onerous than restricted discretionary or discretionary.	
Natural Character		
General point Rules The policies, rules and standards for Infrastructure within coastal and riparian margins are located in the INF (INF-CE) chapter.	Transpower supports the clarification afforded by the note that the Natural Character Chapter does not apply to Infrastructure. The plan provides: <i>The policies, rules and standards for Infrastructure within coastal and riparian margins are located in the INF (INF-CE) chapter. (It is noted there is no INF-CE chapter.)</i> It is also noted INF-P15 relates to <i>New or upgraded infrastructure in coastal character overlays</i> , thereby reinforcing the interpretation the Natural Character chapter does not apply. However, to remove doubt with plan interpretation, it is suggested the above clause be moved to the Introduction. Should the plan be framed such that the Natural Character Chapter provisions apply, Transpower seeks appropriate recognition of the National Grid within the chapter to give effect to the NPSET.	Retain the note <i>The policies, rules and standards for Infrastructure within coastal and riparian margins are located in the INF (INF-CE) chapter.</i> , but relocate to the Introduction section of the chapter.
Natural Features and Landscapes		
General point Rules The policies, rules and standards for Infrastructure within ONFL are located in the INF (INF-NFL) chapter.	Transpower supports the clarification afforded by the following note that the Natural Features and Landscapes Chapter does not apply to Infrastructure. <i>The policies, rules and standards for Infrastructure within ONFL are located in the INF (INF-NFL) chapter. (It is noted there is no INF-NFL chapter.)</i> It is further noted INF-P16 relates to <i>New or upgraded infrastructure in Outstanding Natural Features and Outstanding</i>	Retain the note <i>The policies, rules and standards for Infrastructure within ONFL are located in the INF (INF-NFL) chapter.</i> , but relocate to the Introduction section of the chapter.

Plan Provisions	Comments	Relief sought
	<p><i>Natural Landscapes.</i>, thereby reinforcing the interpretation the Natural Feature and Landscapes does not apply. However, to remove doubt with plan interpretation, it is suggested the clause be moved to the Introduction.</p> <p>Should the plan be framed such that the Natural Features and Landscapes Chapter provisions apply, Transpower seeks appropriate recognition of the National Grid within the chapter to give effect to the NPSET.</p>	
Subdivision		
<p>SUB-P25</p> <p>Subdivision of land within the National Grid Corridor and the Gas Transmission Pipeline Corridor</p> <p>Only allow for subdivision within the National Grid Corridor or the Gas Transmission Pipeline Corridor where:</p> <ol style="list-style-type: none"> 1. Any adverse effects on and from the National Grid Corridor or the Gas Transmission Pipeline Corridor, including public health and safety, are avoided, remedied or mitigated, taking into account: <ol style="list-style-type: none"> a. The impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid Corridor or the Gas Transmission Pipeline Corridor; b. For the National Grid Corridor – The ability of any potential future development to comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; c. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a dwelling can be provided outside of the National Grid Yard or the Gas Transmission Pipeline Corridor for each new lot; 	<p>Transpower supports the policy but seeks amendment to separate the National Grid from the Gas transmission network. Transpower is not opposed to the policy approach for the Gas network but seeks separate policies noting the national significance of the National Grid is recognised in the NPSET.</p> <p>Further amendments sought include:</p> <ul style="list-style-type: none"> - Inserting a directive within the chapeau that the Grid is not compromised. - Deletion of clause 1. As it is not required. It is covered elsewhere. - Insertion of access within clause a. - Grammatical amendment in clause b. - Clarification in clause c. that the requirement applies to all new lots. - Insertion of two new clauses relating to consultation with Transpower and consideration of vegetation planting. 	<p>Amend the policy as follows:</p> <p>SUB-P25</p> <p>Subdivision of land within the National Grid Corridor and the Gas Transmission Pipeline Corridor</p> <p>Only allow for subdivision within the National Grid Corridor or the Gas Transmission Pipeline Corridor where <u>it can be demonstrated that the National Grid will not be compromised taking into account:</u></p> <p>1. Any adverse effects on and from the National Grid Corridor or the Gas Transmission Pipeline Corridor, including public health and safety, are avoided, remedied or mitigated, taking into account:</p> <p>a. The impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid Corridor including the ability for continued reasonable access to existing transmission assets for maintenance, inspections and upgrading or the Gas Transmission Pipeline Corridor;</p> <p>b. For the National Grid Corridor – The ability of any potential future development to comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Electrical Safe Distances;</p> <p>c. The extent to which the design and layout of the subdivision demonstrates that a suitable building</p>

Plan Provisions	Comments	Relief sought
<p>d. The risk to the structural integrity of the National Grid Corridor or the Gas Transmission Pipeline Corridor; and</p> <p>e. The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from the National Grid Corridor or the Gas Transmission Pipeline Corridor and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid assets.</p>		<p><i>platform(s) for a dwelling can be provided outside of the National Grid Yard for each new lot or the Gas Transmission Pipeline Corridor for each new lot;</i></p> <p><i>d. The risk to the structural integrity of the National Grid Corridor or the Gas Transmission Pipeline Corridor; and</i></p> <p><i>e. The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from the National Grid Corridor or the Gas Transmission Pipeline Corridor and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid assets;</i></p> <p><i>f. <u>The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid; and</u></i></p> <p><i>g. <u>The outcome of any consultation with, and technical advice from, Transpower.</u></i></p>
<p>SUB-R23</p> <p>Subdivision of land within the National Grid Corridor</p> <p>All zones</p> <p>1. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. For each proposed allotment that is capable of accommodating a building, other than allotments for access or infrastructure, a proposed building platform and related access is identified which is located entirely outside of the National Grid Corridor.</p> <p>2. Matters of discretion:</p> <p>a. The relevant matters in SUB-P25.</p> <p>Notification Status:</p>	<p>Transpower largely supports the rule. Given the national significance of the National Grid, inappropriate development is a potential issue. In order to manage subdivision that has the potential to compromise the operation, maintenance, upgrading and development of the National Grid, Transpower supports the provision of a corridor management approach which allows for the reasonable use of land inside the transmission line corridor, with several standards and rules imposed to ensure that any subdivision that might compromise the Grid is either avoided or managed. The approach sought by Transpower has been rolled out across New Zealand for the past twelve years as plans have come up for review.</p> <p>Subdivision is considered the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) on potential activities, are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). The provision of a restricted</p>	<p>Amend the rule as follows:</p> <p>SUB-R23</p> <p>Subdivision of land within the National Grid Corridor</p> <p>All zones</p> <p>1. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. <i><u>It is able to be demonstrated that all resulting allotments are capable of accommodating a building platform for the likely principal building(s) and any building(s) for a sensitive activity located entirely outside of the National Grid Yard, other than where the allotments are for roads, access ways, or network utilities. For each proposed allotment that is capable of accommodating a building other than allotments for access or infrastructure, a proposed building platform</u></i></p>

Plan Provisions	Comments	Relief sought
<ul style="list-style-type: none"> Applications under this rule are precluded from being publicly notified. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited. <p>2. Activity status: Non-complying</p> <p>Where:</p> <p>a. Compliance is not achieved with SUB-R23-1</p>	<p>discretionary activity status is consistent with that secured across multiple district plan reviews across New Zealand.</p> <p>Notwithstanding the support, an amendment is sought to the clause a, to clarify the requirement.</p> <p>A new clause b. is also sought to ensure the subdivision does not compromise ongoing access.</p>	<p>and related access is identified which is located entirely outside of the National Grid Corridor.</p> <p>b. <u>The layout of allotments of any enabling earthworks must ensure that physical access is maintained to any National Grid support structures located on the allotments, including any balance area.</u></p> <p>2. Matters of discretion:</p> <p>b. The relevant matters in SUB-P25.</p> <p>.....</p>
Coastal Environment		
<p>General point</p> <p>Rules</p> <p>The policies, rules and standards for Infrastructure within the CE are located in the INF (INF-CE) chapter.</p>	<p>Transpower supports the clarification afforded by the note that the CE chapter does not apply to Infrastructure. The plan provides:</p> <p><i>The policies, rules and standards for Infrastructure within the CE are located in the INF (INF-CE) chapter. (It is noted there is no INF-CE chapter.)</i></p> <p>It is noted INF-P14 relates to <i>New or upgraded infrastructure in coastal or riparian margins.</i> thereby reinforcing the interpretation that the Natural Character chapter does not apply. However, to remove doubt with plan interpretation, it is suggested the above clause be moved to the Introduction.</p> <p>Should the plan be framed such that the Coastal Chapter provisions apply, Transpower seeks appropriate recognition of the National Grid within the chapter to give effect to the NPSET.</p>	<p>Retain the note but relocate to the Introduction section of the chapter.</p>
Earthworks		
<p>Other relevant chapters of the District Plan</p> <p>This Earthworks chapter contains the earthworks provisions for all zones and overlays, with two exceptions:</p> <p>1. The provisions of this chapter do not apply to quarrying activities in the Special Purpose Quarry Zone; and</p>	<p>Transpower supports the clarification afforded by the note but seeks a minor reference to refer to Yard instead of Corridor. This would reflect the definition.</p> <p>However, deletion of the reference “that are not related to infrastructure” is sought on the basis there appears no other corresponding rule to capture the activity.</p>	<p>Amend as follows:</p> <p><i>Other relevant chapters of the District Plan</i></p> <p><i>This Earthworks chapter contains the earthworks provisions for all zones and overlays, with two exceptions:</i></p>

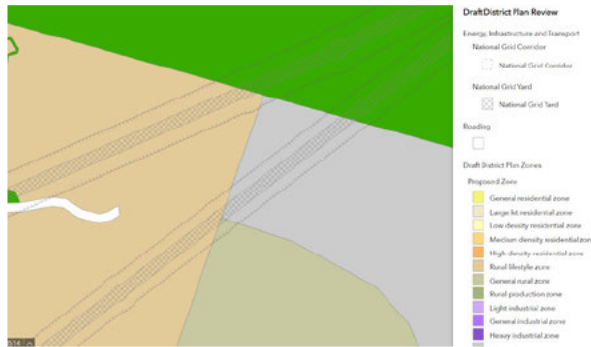
Plan Provisions	Comments	Relief sought
<p>2. All provisions relating to earthworks for infrastructure are contained in the Infrastructure Chapter, noting that provisions relating to earthworks within the National Grid Corridor and the Gas Transmission Pipeline Corridor that are not related to infrastructure are included in this Chapter.</p>		<p>1. The provisions of this chapter do not apply to quarrying activities in the Special Purpose Quarry Zone; and</p> <p>2. All provisions relating to earthworks for infrastructure are contained in the Infrastructure Chapter, noting that provisions relating to earthworks within the National Grid Corridor Yard and the Gas Transmission Pipeline Corridor that are not related to infrastructure are included in this Chapter.</p>
<p>EW-P14</p> <p>Earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor (that are not associated with infrastructure)</p> <p>Earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor are managed as follows:</p> <ol style="list-style-type: none"> 1. Enable earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor where they are of a scale and nature that will not compromise the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Network. 2. Only allow earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor where it can be demonstrated that the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Network will not be compromised, taking into account: <ol style="list-style-type: none"> a. The extent to which the earthworks may compromise the safe access to and operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Pipeline; 	<p>Earthworks (and vertical holes) are an activity which can also adversely affect and compromise the National Grid. Specific to the National Grid, earthworks have the potential to undermine transmission line structures, generate dust, reduce the safe clearances between the ground and conductors. They also have the potential to restrict Transpower's ability to access the line and locate the heavy machinery required to maintain support structures around the lines and may lead to potential tower failure and significant constraints on the operation of the line.</p> <p>On this basis Transpower supports the policy (and specific rule) but seeks amendment to separate the National Grid from the Gas transmission network. Transpower is not opposed to the policy approach for the Gas network, but seeks separate policies noting the national significance of the National Grid is recognised in the NPSET.</p> <p>Deletion of clause 1 is sought as the matter is addressed within clause 2 (renumbered clause 1) .</p> <p>An amendment is sought to clause b. to reflect the issue is in relation to support structures.</p> <p>Reference is also sought to refer to vertical holes as these are excluded from the definition of Earthworks.</p>	<p>Amend as follows to separate the Grid from the Gas Transmission pipeline, and further amendments as follows:</p> <p>EW-P14</p> <p>Earthworks and vertical holes within the National Grid Yard and the Gas Transmission Pipeline Corridor (that are not associated with infrastructure)</p> <p>Earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor are managed as follows:</p> <ol style="list-style-type: none"> 1. Enable earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor where they are of a scale and nature that will not compromise the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Network. 2. 1. Only allow earthworks and vertical holes within the National Grid Yard and the Gas Transmission Pipeline Corridor where it can be demonstrated that the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Network will not be compromised, taking into account: <ol style="list-style-type: none"> a. The extent to which the earthworks <u>and vertical holes</u> may compromise the safe access to and operation,

Plan Provisions	Comments	Relief sought
<p>b. The stability of land within and adjacent to the National Grid or the Gas Transmission Pipeline Corridor;</p> <p>c. Risks relating to health or public safety, including the risk of property damage; and</p> <p>d. Technical advice provided by the owner and operator of the National Grid or the Gas Transmission Network</p>		<p><i>maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Pipeline;</i></p> <p>b. <i>The risk to the structural integrity of the affected National Grid support structure(s) The stability of land within and adjacent to the National Grid or the Gas Transmission Pipeline Corridor;</i></p> <p>c. <i>Risks relating to health or public safety, including the risk of property damage; and</i></p> <p>d. <i>Technical advice provided by the owner and operator of the National Grid or the Gas Transmission Network</i></p>
<p>EW-R15 Earthworks within the National Grid Yard (that are not associated with infrastructure)</p> <p>All zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>Compliance is achieved with EW-S13.</p> <p>All Zones</p> <p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>Compliance is not achieved with EW-R15-1.</p> <p>Matters of discretion:</p> <p>1. The matters of discretion of any infringed standard</p> <p>2. The relevant matters in EW-P14.</p> <p>Notification Status:</p> <ul style="list-style-type: none"> Applications under this rule are precluded from being publicly notified. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited. 	<p>Transpower supports the provision of earthwork provisions on the basis that earthwork activities are a form of development that can compromise the National Grid (Policy 10). Earthworks adjacent to support structures can undermine the stability of the structure foundations, causing the structure to lean or, worse, collapse, leading to power outages. Excavations or mounding mid-span can increase risks by reducing the clearance between the ground and conductors. Excavated areas or piles of earthworks can also restrict Transpower's ability to access and locate the heavy machinery required to maintain support structures and conductors around the lines, including in emergency situations. For these reasons, Transpower seeks controls on earthworks near the National Grid. The provision of a rule framework achieves Policies 2 and 10 of the NPSET in that it protects the integrity of the National Grid and Transpower's ability to maintain and operate it.</p> <p>Notwithstanding the above support, amendments are sought to the rule as follows:</p> <ul style="list-style-type: none"> Deletion of the reference "that are not associated with infrastructure" on the basis there appears no other corresponding rule to capture the activity. Amendment to the default activity status from restricted discretionary to non complying. Transpower considers a restricted discretionary activity would be inconsistent with the firm statutory direction in higher order planning 	<p>EW-R15 Earthworks <u>and vertical holes</u> within the National Grid Yard (that are not associated with infrastructure)</p> <p>All zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>Compliance is achieved with EW-S13.</p> <p>All Zones</p> <p>2. Activity status: Restricted Discretionary Non complying</p> <p>Where:</p> <p>Compliance is not achieved with EW-R15-1.</p> <p>Matters of discretion:</p> <p>2- The matters of discretion of any infringed standard</p> <p>4- The relevant matters in EW-P14.</p> <p>Notification Status:</p> <ul style="list-style-type: none"> Applications under this rule are precluded from being publicly notified. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited.

Plan Provisions	Comments	Relief sought
<p>Matters of discretion:</p> <ol style="list-style-type: none"> 1. Impacts on the operation, maintenance, upgrading and development of the National Grid; 2. The risk to the structural integrity of the affected National Grid support structure(s); 3. Any impact on the ability of Transpower to access the National Grid; 4. The risk of electrical hazards affecting public or individual safety, and the risk of property; 5. Technical advice provided by Transpower; and 6. Any effects on National Grid support structures including the creation of an unstable batter. 	<p>instruments. Policy 10 of the NPSET is very directive in requiring that decision makers “must” manage activities to ensure the “operation, maintenance, upgrading and development of the electricity transmission network is not compromised”. Earthworks are an activity that can compromise the National Grid. While the NPSET policy refers to ‘manage’ it is very directive in that the outcome is to ensure the Grid is not compromised. The rule and policy framework is the way in which activities will be managed. This is achieved by a permitted activity rule which allows for a range of activities, but where the standards are not met, a non-complying rule applies. A non-complying activity status also gives effect to the strong directive wording within EW-P14 that directs the Grid must not be compromised. Furthermore, restricted discretionary activity status may result in plan users having unrealistic expectations that consent would be approved. Plans that set unrealistic expectations are not efficient or effective. Conversely, non-complying activity status sends a clear signal that a proposed activity is not anticipated and therefore less likely to be consistent with the Plan and to successfully gain resource consent. The default non complying is also consistent with the approach currently being sought (and secured) by Transpower across NZ.</p> <ul style="list-style-type: none"> - The National Planning Standard definition of earthworks specifically excludes the disturbance of land for the installation of fence posts. For this reason, the rule needs to be amended to expressly regulate earthworks associated with fence posts. It is noted the standard EW-S13 references vertical holes. 	<p>Matters of discretion:</p> <p>7. Impacts on the operation, maintenance, upgrading and development of the National Grid;</p> <p>8. The risk to the structural integrity of the affected National Grid support structure(s);</p> <p>9. Any impact on the ability of Transpower to access the National Grid;</p> <p>10. The risk of electrical hazards affecting public or individual safety, and the risk of property;</p> <p>11. Technical advice provided by Transpower; and</p> <p>12. Any effects on National Grid support structures including the creation of an unstable batter.</p>
<p>EW-S13 Earthworks within the National Grid Yard (that are not associated with infrastructure)</p> <ol style="list-style-type: none"> 1. Earthworks or vertical hole depth must be no greater (measured vertically) than: 	<p>As noted in the commentary on rule EW-R15, the provision of a rule and standard relating to earthworks or vertical holes within the National Grid Yard is supported. Notwithstanding the support, amendments are sought as follows:</p> <ul style="list-style-type: none"> - Deletion of the reference “that are not associated with infrastructure” on the basis there appears no other corresponding rule to capture the activity. 	<p>EW-S13 Earthworks <u>or vertical holes</u> within the National Grid Yard (that are not associated with infrastructure)</p> <ol style="list-style-type: none"> 1. Earthworks or vertical hole depth must be no greater (measured vertically) than:

Plan Provisions	Comments	Relief sought
<p>a. 300 millimetres within 6 metres of the outer visible edge of a foundation of any National Grid support structure: or</p> <p>b. 3m between 6 metres and 12 metres from the outer visible edge of a foundation of any National Grid support structure.</p> <p>2. Earthworks or vertical holes must not:</p> <p>a. Result in a reduction in the ground to conductor clearance distances as required in Table 4 of the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.</p> <p>b. Compromise the stability of the National Grid Support Structure</p> <p>The following are exempt from this standard:</p> <ul style="list-style-type: none"> • Earthworks, excluding mining and quarrying, that are undertaken by the operator of the National Grid; • Earthworks, excluding mining and quarrying, for the repair, sealing or resealing of a footpath, driveway or farm track; • Vertical holes not exceeding 500 millimetres in diameter that: <ul style="list-style-type: none"> – are more than 1.5 metres from the outer edge of the pole support structure or stay wire; or – are a post hole for a farm fence or horticulture structure more than 6 metres from the visible outer edge of a tower or support structure foundation; and – Earthworks subject to a dispensation from Transpower under New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663. 	<ul style="list-style-type: none"> - Insertion of a standard ensuring continued access to support structures on the basis earthworks can restrict Transpower's ability to access and locate the heavy machinery required to maintain support structures and conductors around the lines, including in emergency situations. - Minor grammatical amendment to change 'the' to 'any'. - Amendment to the first exclusion to apply to all network utility providers (which would include the National Grid operator) - Amendment to the exemption clauses to reflect NZECP34 does not allow for a dispensation from conductor clearance distance requirements. 	<p>a. 300 millimetres within 6 metres of the outer visible edge of a foundation of any National Grid support structure: or</p> <p>b. 3m between 6 metres and 12 metres from the outer visible edge of a foundation of any National Grid support structure.</p> <p>2. Earthworks or vertical holes must not:</p> <p>a. <u>Permanently physically impede vehicular access to a National Grid support structure</u></p> <p>b. Compromise the stability of the <u>any</u> National Grid Support Structure</p> <p>c. a-Result in a reduction in the ground to conductor clearance distances as required in Table 4 of the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.</p> <p>The following are exempt from compliance with EW-S13.1 and 2. a. and b. above:</p> <ul style="list-style-type: none"> • Earthworks <u>or vertical holes</u>, excluding mining and quarrying, that are undertaken by <u>a network utility operator as defined by the Resource Management Act 1991</u> the operator of the National Grid; • Earthworks <u>or vertical holes</u>, excluding mining and quarrying, for the repair, sealing or resealing of a footpath, driveway or farm track; • Vertical holes not exceeding 500 millimetres in diameter that: <ul style="list-style-type: none"> – are more than 1.5 metres from the outer edge of the pole support structure or stay wire; or – are a post hole for a farm fence or horticulture structure more than 6 metres from the visible outer edge of a tower or support structure foundation; and

Plan Provisions	Comments	Relief sought
		<ul style="list-style-type: none"> • Earthworks <u>or vertical holes</u> subject <ul style="list-style-type: none"> – to a dispensation from Transpower under New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663; or – <u>in relation to rule EW-S13.2.a., written approval is provided by Transpower.</u>
Part 3 – Area Specific Matters		
Zones		
General comment	<p>Based on earlier comments Transpower understands the zone chapters do not apply to infrastructure activities. For example, the Infrastructure chapter provides:</p> <p><i>“For the most part, the rules of this chapter override all rules in area-specific and other district-wide chapters. However, the rules of this chapter do not include:...”</i></p> <p>Transpower would support clarification within the Zone chapters that Infrastructure is managed within the Infrastructure chapter and not the zone chapters.</p>	Clarify within the Zone Chapters they do not apply in relation to the National Grid.
GRUZ-P8 Protect highly productive land from inappropriate use and development Avoid activities that: <ol style="list-style-type: none"> 1. Reduce the amount of highly productive land; 2. Result in fragmentation of highly productive land; or 3. Restrict primary production activities on highly productive land. 	<p>Whilst Transpower supports the intent of the policy, it seeks amendment to GRUZ-P8 to give effect to the NPS-HPL clause 3.9 in terms of those activities which are not deemed inappropriate. Transpower has concerns Policy GRUZ-P8 as drafted does not give effect to the NPS-HPL.</p>	Amend the policy to give effect to NPS-HPL Clause 3.9.
Maps		
Maps		
District Plan maps generally	<p>The National Grid is identified by two features on the planning maps, as follows:</p> <ul style="list-style-type: none"> - National Grid Yard 	Amend the District Plan maps to identify the ‘National Grid lines’ on the District Plan maps, in accordance with National Planning Standard 13 (mapping standard) and Table 20 of the National Planning Standards.

Plan Provisions	Comments	Relief sought
	<p>- National Grid Subdivision Corridor</p>  <p>The map displays a green area at the top representing the National Grid Subdivision Corridor. Below it, various colored zones are shown, including yellow for General residential zone, orange for Large lot residential zone, light green for Low density residential zone, medium green for Medium density residential zone, dark green for High density residential zone, brown for Rural lifestyle zone, light brown for General rural zone, dark brown for Rural production zone, purple for Light industrial zone, and dark purple for Heavy industrial zone. A legend on the right side of the map provides a key for these zones and other features like National Grid Corridor, National Grid Yard, and National Grid Yard.</p> <p>Transpower supports the mapping of the National Grid. However, it has concerns with the identification of the Yard and Corridor setbacks on the maps as the aerial mapping cannot always be relied upon. Instead Transpower's preference is for reliance on the setbacks stipulated in the definitions for National Grid Yard and National Grid Subdivision Corridor.</p> <p>Transpower seeks the Grid be identified as 'National Grid lines' on the planning maps. This would also give effect to the National Planning Standards.</p>	

Saritha Shetty

From: Karen Williams <Karen@urbanedgeplanning.co.nz>
Sent: Thursday, 14 December 2023 4:03 pm
To: District Plan Review Team
Subject: [EXTERNAL] 105-107 Victoria Street, Alicetown - submission on draft District Plan
Attachments: HCC DDP - 105-107 Victoria Street - Submission.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Good afternoon

Please find attached a submission on the HCC Draft District Plan by Urban Edge Planning on behalf of Tory Property Holdings Limited in relation to their site at **105-107 Victoria Street, Alicetown**.

Please feel free to contact me with any queries.

Many thanks
Karen

Karen Williams
Principal Planner
027 303 8835
karen@urbanedgeplanning.co.nz



Bouverie Business Centre (BBC)
Suite 1B, [5 Bouverie Street, Petone](#)

PO Box 39071, Wellington Mail Centre, Lower Hutt 5045

SUBMISSION ON
HUTT CITY COUNCIL - DRAFT DISTRICT PLAN

To: Hutt City Council
By email to: district.plan@huttcity.govt.nz

Submission on: Draft District Plan

Name of Submitter: Urban Edge Planning Ltd
on behalf of Tory Property Holdings Limited

Address for service: Urban Edge Planning
PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

Attention: Karen Williams
027 3038835
Karen@urbanedgeplanning.co.nz

- This is a submission made on behalf of Tory Property Holdings Limited concerning the Draft District Plan as notified by Hutt City Council on 9 November 2023.
- Tory Property Holdings Limited **could not gain an advantage in trade competition** through this submission.
- The specific provision of the Draft District Plan that this submission relates to is the proposed zoning of the site at **105-107 Victoria Street, Alicetown.**
- Urban Edge Planning on behalf of Tory Property Holdings Limited seeks the zoning of the site at **105-107 Victoria Street as Mixed Use Zone.**

SITE CONTEXT

This submission relates to the site at 105-107 Victoria Street.



Figure 1: 105-107 Victoria Street - Aerial Photography (Source: HCC GIS)

The site can be described as follows:

Address	105-107 Victoria Street, Alicetown
Size	3,726m ²
Title	993328, 938583, 938584
Parcel ID	8225779, 8225780, 7819558, 7819569
Legal description	Lot 1 Deposited Plan 558121, Lot 2 DP 558121, Section 1 Survey Office Plan 509558, Section 2 Survey Office Plan 509558
Location	<p>105 Victoria Street is Lot 1 DP 558121 in Record of Title 993328 (1641m²) and Section 2 Survey Office Plan 509558 in Record of Title identifier 938584 – 59m². 107 Victoria Street is Section 1 Survey Office Plan 509558 and Lot 2 DP 558121 in Record of Title 938583 (2026m²).</p> <p>At the confluence of Victoria Street, Railway Avenue Slip Road and the Ewen Bridge off-ramp, in proximity to Victoria Street Reserve.</p>
Operative DP Zoning	High Density Residential Activity Area
Operative DP Overlay	<ul style="list-style-type: none"> Flood Inundation Hazard Overlay
Draft DP Zoning	Light Industrial Zone
Draft DP Overlays	<ul style="list-style-type: none"> Flood Hazard Overlay - Inundation Area

	<ul style="list-style-type: none"> • Liquefaction Hazard Overlay
Current Use and Development	<ul style="list-style-type: none"> • Storage of vehicles for servicing, and for vehicular sales, in association with Gazley Motors • Formerly part of the WelTec Campus
Surrounding Area	<p>The site is located at the confluence of Victoria Street, Railway Avenue Slip Road and the Ewen Bridge off-ramp, to the north of Victoria Street Reserve.</p> <p>A mixture of land uses surrounds the site, including car dealerships, education facilities, residential and auto-oriented industry.</p> <p>Current Zoning</p> <ul style="list-style-type: none"> • High Density Residential Activity Area to the west • General Business Activity Area to the north and east • General Recreation to the south <p>Proposed Zoning</p> <ul style="list-style-type: none"> • Light Industrial Zone to the north and east • Mixed Use to the west • Open Space Zone to the south



Figure 2: Subject site comprised of different parcels (Source: GRIP)

PLANNING CONTEXT

Operative District Plan

Under the Operative District Plan the site at 105-107 Victoria Street, Alicetown is zoned as High Density Residential Activity Area and is subject to the following Natural and Coastal Hazards Overlays that have recently been introduced as part of the Plan Change 56 process:

- Flood Hazard Overlay - Flood Inundation

We note that prior to Plan Change 56 the site was zoned as General Residential Activity Area.

The High Density Residential Activity Area was recently introduced by Plan Change 56. It provides for a variety of medium and high density residential development outcomes and anticipates a built urban environment of at least six storeys. Small-scale non-residential activities are provided for within the High Density Residential Activity Area where they are compatible with residential activities.



Figure 3: 105-107 Victoria Street – Operative District Plan (Source: HCC GIS Viewer)

Draft District Plan

Under the Draft District Plan the site at 105-107 Victoria Street is proposed to be zoned as Light Industrial Zone. The following Natural and Coastal Hazard overlays apply:

- Flood Hazard Overlays - Inundation Area
- Liquefaction Hazard Overlay

The site is also subject to the Mana Whenua Statutory Acknowledgement overlay but no other overlays or precincts apply.

The Draft District Plan has zoned the subject site Light Industrial Zone to reflect the adjacent zoning to the north; although it is noted that the adjacent land directly to the west has been zoned as Mixed Use Zone.



Figure 4: 10 Udy Street – Draft District Plan – Zones (Source: HCC GIS Viewer)

RMA Consenting background

The site is currently used for vehicle storage and display in association with Gazley Motors. Resource consent was granted in July 2023 under RM230084 for the permanent use of the site for the storage and sale of vehicles (following earlier approvals for this activity to occur on a temporary basis). There is an existing storage container located on site and a billboard (both consented under RM190229).

Current Use and Development

The site is currently utilised for the storage of vehicles for servicing, and for vehicular sales, in association with Gazley Motors.

Site History

A search of Hutt City Council’s historical aerial maps gives a good understanding of the use and development of the site.

The earliest aerials from 1941 and 1958 show that the site appears to have been previously used by timber companies to mill and store timber. These activities extended across to the adjacent area of land to the west currently accommodating the Alicetown Playcentre site.

By the mid-1960s, the site was redeveloped for use by the Hutt Valley Polytechnic and later the Wellington Institute of Technology (WelTec) until 2009. The site has been used for various non-residential activities since the decommissioning of the WelTec campus, including the current use as a commercial car sales yard.



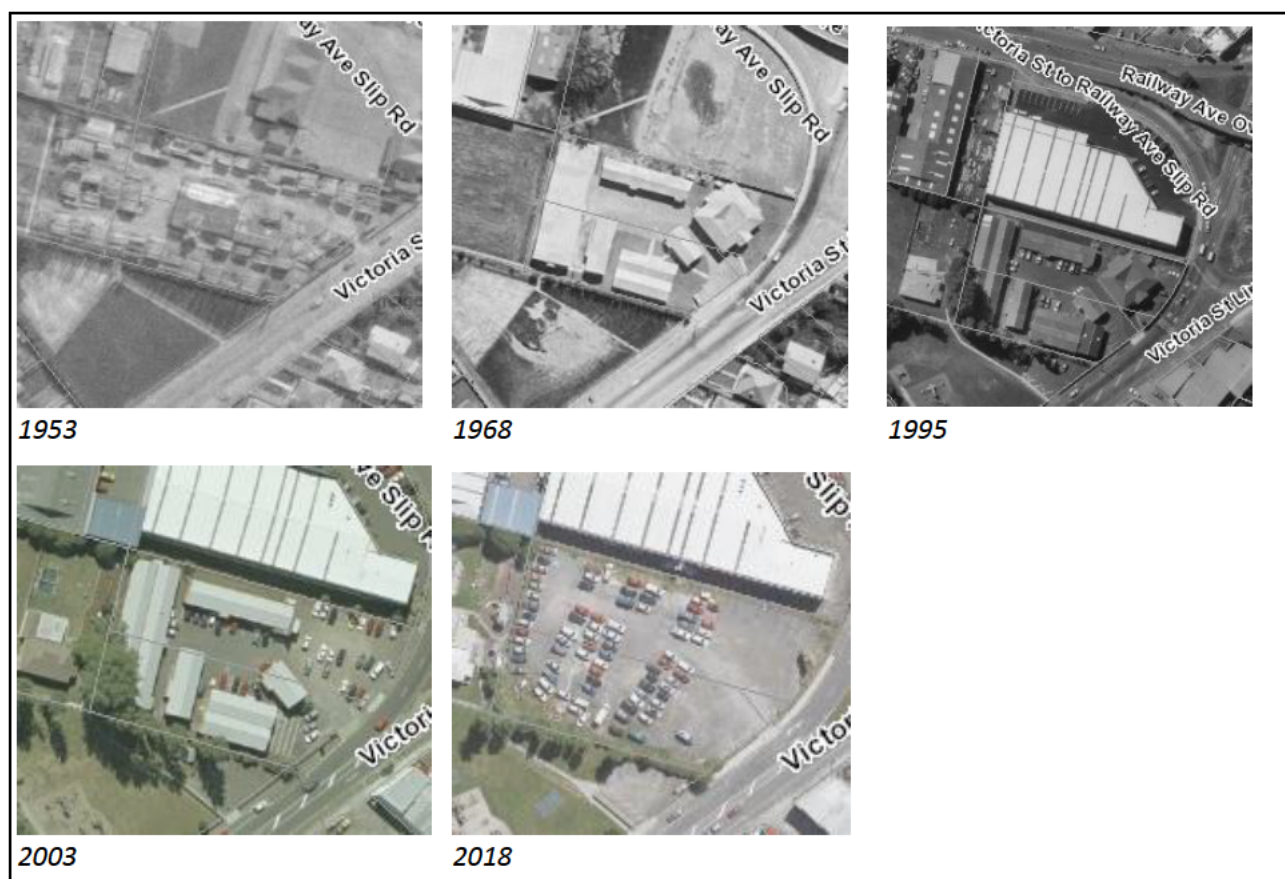


Figure 5: 105-107 Victoria Street – Historical Aerial Maps (Source: HCC GIS Viewer)

SUBMISSION

Submission

This submission supports the introduction of a Mixed Use Zone planning framework into the District Plan and seeks its retention.

This submission opposes the proposed zoning of the site at 105-107 Victoria Street as Light Industrial Zone as proposed by the Draft District Plan and instead requests the zoning as Mixed Use Zone.

Reasons

The proposed Light Industrial Zone would limit opportunities for future onsite activities (including those that are already currently enabled under the operative zoning).

The requested Mixed Use Zone would more accurately reflect the surrounding area, which comprises a wide range of activities and different building styles and densities, with a varied planned urban built form. The Mixed Use Zone would accordingly reflect and align well with the diverse environment the site is located within.

The requested Mixed Use Zone would allow for a broader range of appropriate activities in this location (including both commercial and residential) in the medium to long term. A Mixed Use Zone would also serve as an appropriate transition zone between the High Density Residential Zone to the south and the Light Industrial Zone to the north. Further to this, the placement of the Mixed Use Zone over the subject site creates a logical extension to the proposed Mixed Use zoning over the adjacent school grounds, as proposed in the draft District Plan.

Noting the surrounding High Density Residential environment surrounding the site, the case for a Mixed Use Zone is strengthened, as this zone can facilitate more walkable neighbourhoods where people can live, work, and shop in close proximity, thereby contributing to a well-functioning urban environment.

It is noted that the methodology informing the spatial application of the Mixed Use Zone has resulted in it being proposed across many sites situated along the main transport route between Petone and the Hutt City CBD (i.e. Cuba Street in Petone and Victoria Street through Alicetown). Zoning the subject site at 105-107 Victoria Street as Mixed Use would be consistent with this methodology, as the site has a frontage to Victoria Street.

Review of submission against Draft District Plan Provisions

Objective 1 of the Proposed Mixed Use Zone describes the purpose of the zone as follows:

Mixed Use areas provide flexibility for any combination of commercial, community, light manufacturing and servicing, recreational, residential, and other compatible activities, while reflecting the Mixed Use Zone's role and function in relation to the hierarchy of centres.

Objective 2 of the Proposed Mixed Use Zone describes the purpose of the zone as follows:

The built character of Mixed Use areas reflects the diversity of activities that take place in the zone and recognises that these areas are generally in transition spatially between other areas, or in transition over time. Main through routes assist the city's identity and character.

Applying the Mixed Use Zone to the site at 105-107 Victoria Street would provide additional flexibility for the use and development of a vacant site. A Mixed Use Zone would facilitate a range of land uses, including those that could support the surrounding high density residential environment, contributing to a well-functioning urban environment.

The Mixed Use Zone would also provide an appropriate transition and interface between the Light Industrial Zone to the north and High Density Residential Zone to the south.

Conclusion

Urban Edge Planning on behalf of Tory Property Holdings Limited seek the zoning of the site at 105-107 Victoria Street as Mixed Use Zone.

The Mixed Use Zone would form a logical extension to the proposed mixed use zoning to the west, while providing the submitter with additional flexibility as to the future use and development of the site. It would also serve as an appropriate interface between the industrial zoning to the north and the residential zoning to the south and east.



Karen Williams
Urban Edge Planning Ltd

On behalf of:
Tory Property Holdings Limited

Date: 14 December 2023



Saritha Shetty

From: [REDACTED]
Sent: Tuesday, 14 November 2023 4:19 pm
To: District Plan Team
Cc: Steve WANG
Subject: [EXTERNAL] Draft District Plan—High Hazard Areas

Categories: Sean

Hi there

This is Tongtong Niu and Miao Wang, we are the property owner of [REDACTED]

We received a letter advised that our property is in an area that has been identified as a **High Hazard Area**.

Can you please advise **what is the reason** of that above decision?

We understand that High Hazard Areas including 4 reasons, however we couldn't identify which reason is applicable for our property.

Thank you

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Saturday, 2 December 2023 12:50 pm
To: District Plan Team
Subject: [EXTERNAL] District plan review - submission.

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

submission .

My submission is that the review and proposed changes to the district plan are unnecessary and infringe my property rights .

A blanket designation based on unproven and dubious data is poor planning and detrimental to landowners .

Creating a High Hazard zone is unnecessary and will create a loss of value to land owners , and a financial risk based on unproven information , the loss of value will see land prices reduce insurance cost to increase or become unattainable .

In my case the property is 97 meters from the sea , elevated 4 .3 meters above sea level and protected by a sea wall 3 meters above sea level .

We will not be affected by a tsunami and request our property is excluded from any plan change at the very least .The house has been in existence for 45 years without any natural hazard damage

your proposed changes are unnecessary .

I wish to be heard at any hearing and want to register my dissatisfaction with the process and the proposed changes are flawed , unnecessary and infringe on my property rights .

I further do not agree council has the skills the expert knowledge or experience to make these decisions , i have consulted broadly on this issue and have counter information and expert advice to the contrary , which i will present at any hearing .

Regards

[REDACTED]



Saritha Shetty

From: [REDACTED]
Sent: Thursday, 16 November 2023 6:56 pm
To: District Plan Review Team
Subject: [EXTERNAL] Large Lot Residential Zone

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Kia Ora,

I wanted to give feedback on the proposed district plan which would see our property changed to a 'Large Lot Residential Zone'

I wholeheartedly agree with this proposal.

A property developer has nearly finished building 2 four bedroom apartments on the property next to us.

This is entirely wrong for this area.

To get his buildings done, the environment has been decimated.

His large buildings impact on all the home owners around him, and he has created a whole raft of issues.

He had to clear cut all the trees, causing extensive damage to our property, the natural streams running from the native reserve into his property have all been diverted, and there have been so many issues with him trying to run them under our property. The side of our property crumbles where he has dug into the hillside, and backfilled with stones. All the fence posts have either fallen or been crushed when he felled all the trees.

The trees that were there, were home to thousands of puriri moth larvae. We found these under the bark of the trees that had come crashing down on our property. We also have skinks, and every type of native insect you can name. They are bigger here, and I have also found kauri snails.

This environment and all its biodiversity has been obliterated.

The other issues with such extreme building on one lot, apart from the visible impact are - the infrastructure is not there - There is very limited off street parking. So if these people renting these two houses have more than one car per house there will be issues. This was a quiet coldasac leading to the native reserve.

If this was Re zoned to a Large Lot this abomination never would've been allowed.

Development should not impact on our ecosystem so drastically.

So I really agree with this area being a large lot zone.

Nga mihi,

[REDACTED]

[REDACTED]



Sent from my iPhone

Saritha Shetty

From: [REDACTED]
Sent: Wednesday, 13 December 2023 11:41 pm
To: District Plan Review Team
Subject: [EXTERNAL] Submission Regarding Proposal to Change Zoning of [REDACTED]
Attachments: [REDACTED] Zoning Change Submission.pdf
Categories: Peter, LLRZ

To whom it may concern,

Attached is a submission regarding the proposed change of zoning for [REDACTED]. As an owner and resident of this property I strongly oppose the proposal to change the zone for this property from Medium Residential Zone to Large Lot Residential Zone.

At the appropriate time, I would also like to make an oral submission to the relevant Council committee.

Regards

[REDACTED]

Submission opposing the proposed rezoning of [REDACTED] (Lot 2 DP 32191) from Medium Density Residential to Large Lot Residential.

This submission is by [REDACTED] has cross-leased titles with two semi-detached, two storey, dwellings and has a land survey area of 746m². We own and reside in the rear dwelling. The other dwelling is owned and occupied by a separate person. We have not discussed this submission with the owner of the front dwelling, so we do not claim to represent her views on the proposed rezoning.

Legal Description of Site: FLAT 2 DP 47806 HAVING 1/2 INT IN 746 SQ METRES BEING LOT 2 DP 32191

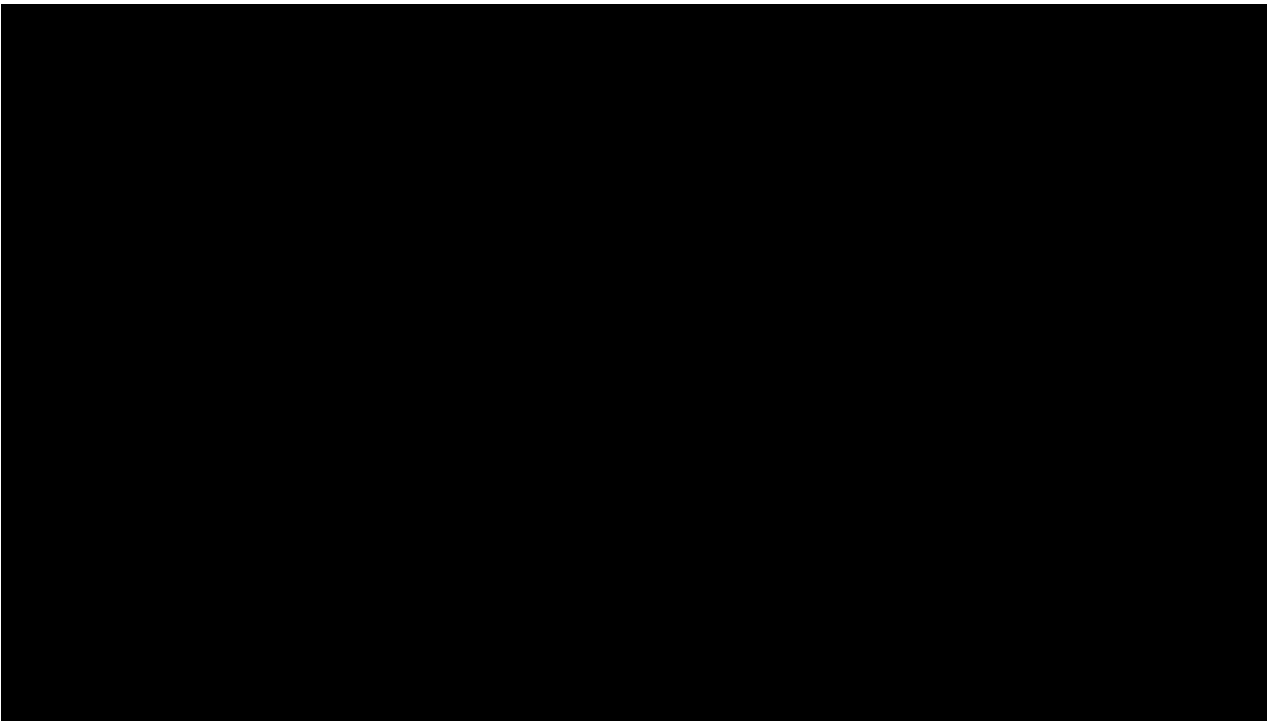
Certificate of Title: WN/18C/101

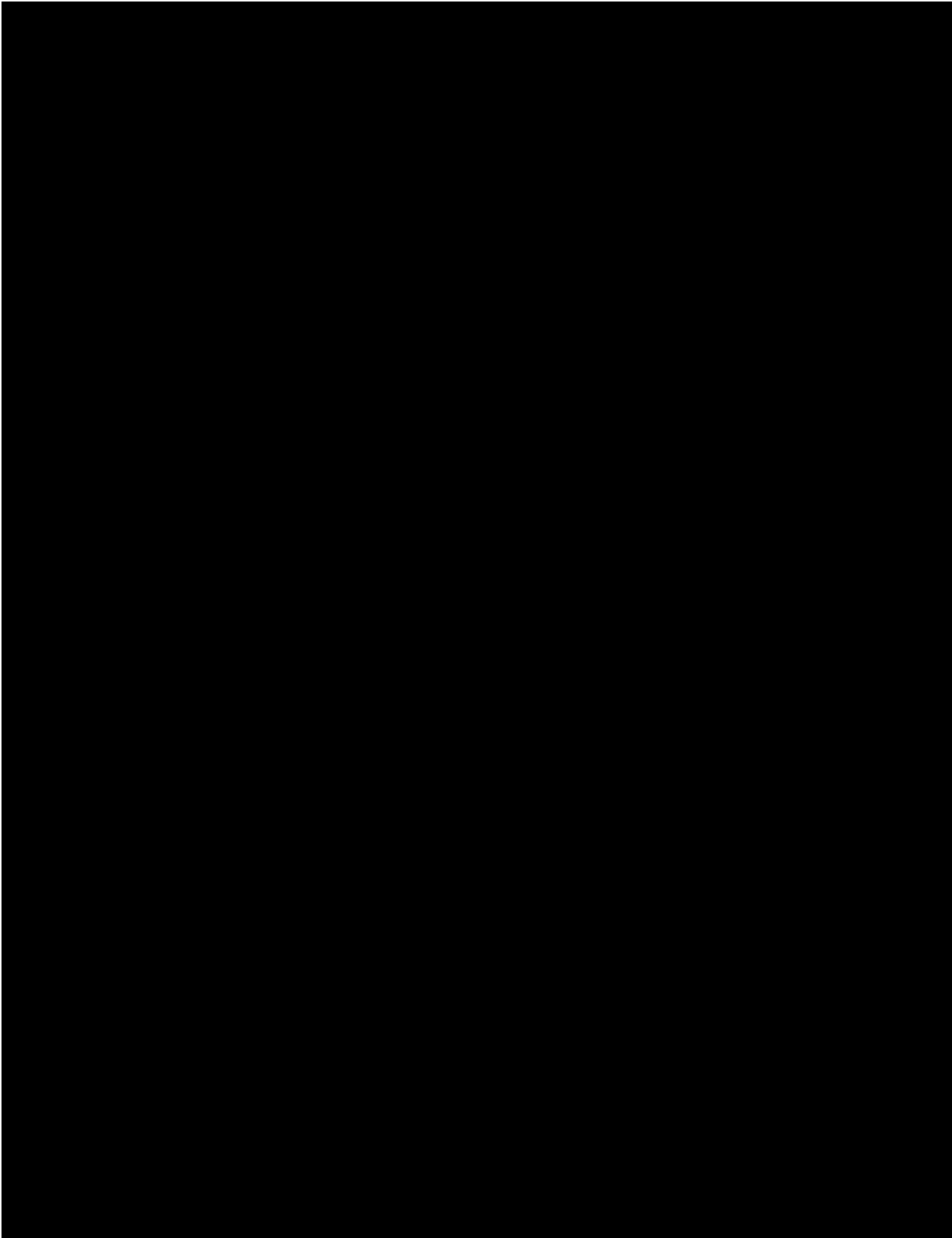
Our submission strongly opposes the rezoning of [REDACTED] from Medium Residential to Large Lot Residential Zone.

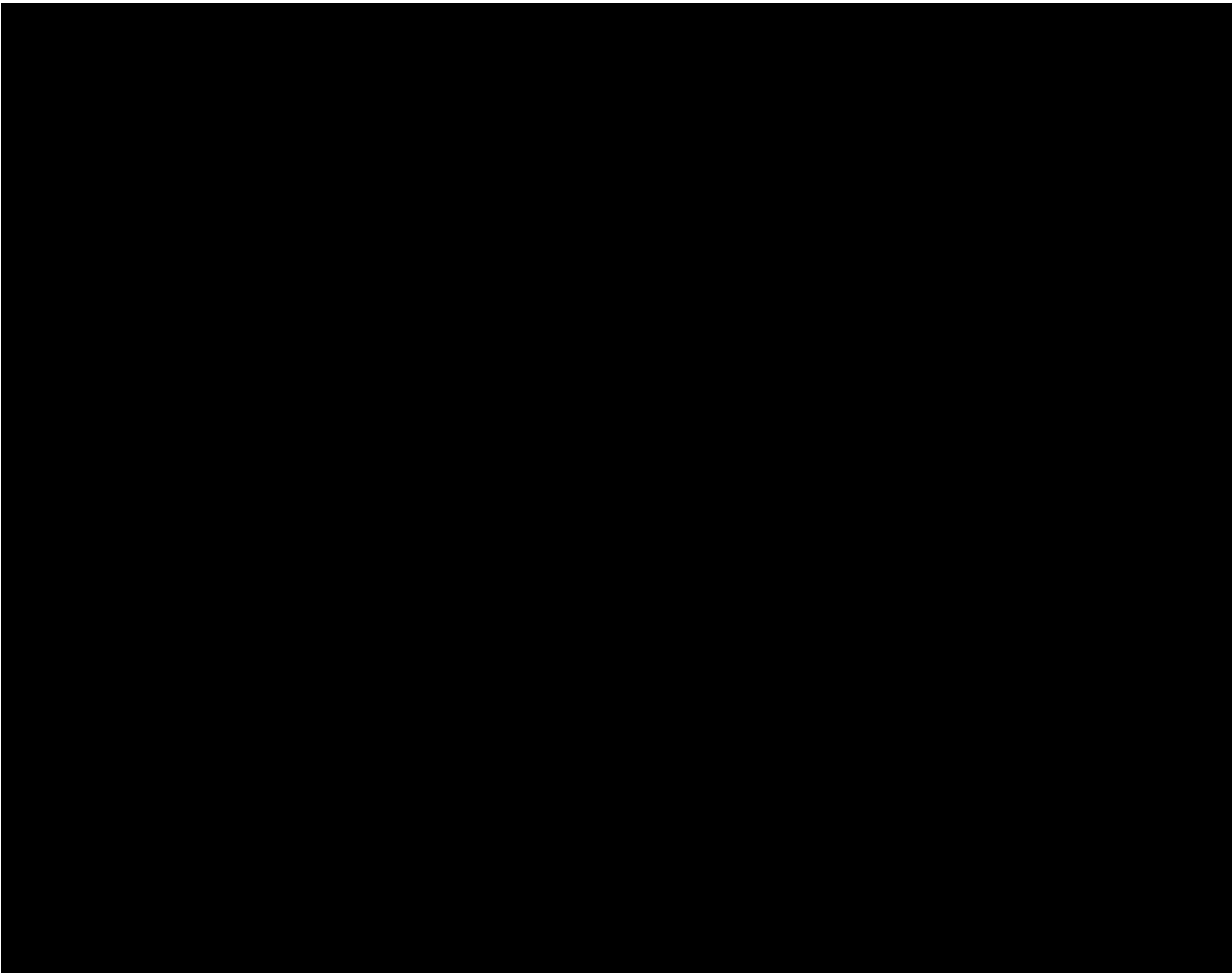
- The current Medium Density Residential Zone provides for three dwellings per site. There are currently two primary dwellings that already exist on the site. If the site was to be fully redeveloped, with a total of three dwellings, there would only be one additional dwelling. This would be a minor increase in population density and servicing requirements. The existing level of development of the site is more consistent with the rules of the current Medium Density Residential Zone than the Large Lot Residential Zone.
- The proposed Large Lot Residential Zone provides for only a single dwelling per site plus a minor additional dwelling. The existing dwellings on the site would have been prohibited from being built if these rules were in place at the time of construction. The proposed zoning rules are more restrictive and would result in less housing being able to be built at a time of housing shortages.
- The proposed Large Lot Residential Zone has a minimum lot size of 1000m². This is larger than the survey area of [REDACTED] which is 746m².
- The existing dwellings were built circa 1973 and are of mediocre design and construction quality. They will soon require significant refurbishment or redevelopment to remain fit for purpose and to meet expectations for housing quality. Due to the property being cross-leased it is currently more difficult and expensive to upgrade or redevelop the dwellings. The proposed zoning change to Large Lot Residential will significantly limit the ability to economically redevelop the ageing dwellings. Rebuilding would allow for modern construction that meets current structural engineering requirements, and insulation and energy efficiency standards.
- 2 Aspen Grove (Lot 2 DP 32191) has a moderate slope, that generally falls diagonally across the section. The cross-fall increases further, at the rear of the section. At the site of the existing dwellings the original ground contours were cut and filled to create the existing building platform. Adjacent to the existing dwellings, the two side boundaries have existing retaining walls of varying quality. These are a mixture of crib wall and gravity block construction retaining walls ranging in height of approximately 1 – 4 metres. The existing Medium Residential Zone makes redevelopment more feasible. Any redevelopment is likely to be most economical on the front half of the section, in place of the existing dwellings. This would allow for the site to be re-engineered and retaining walls to be rebuilt to meet current-day geotechnical requirements.

This would increase the resilience of the land to natural hazards such as earthquake and landslip risks. These risks are likely to remain unmitigated if the zoning is changed to Large Lot Residential. Redevelopment would also allow for improved surface water management and retention.

- Approximately 40% of the property is covered by regenerating native plants. This has been encouraged and maintained by the current owner. Under the Medium Density Zone rules maximum site coverage cannot exceed 50%. Any redevelopment of the site is likely to be most economic at the front half of the section, as such, this vegetation is likely to remain relatively unaffected.
- The proposed rezoning appears to have been applied inconsistently and somewhat arbitrarily. There are similar properties in the immediate neighbourhood that are proposed to remain in the Medium Density Residential Zone.







Saritha Shetty

From: Simon Hirini <simon.hirini@taita.school.nz>
Sent: Friday, 8 December 2023 2:29 pm
To: District Plan Team
Subject: [EXTERNAL] c/o Jo Miller Notable Trees

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Check if replied, Sean

Tēnā koe,

Taitā College has received your letter concerning the change of land use in the council and that the Notable Trees are one of the things that we need to consider regarding removal and trimming of trees.

Firstly, can we ask which of the trees on our site is a Notable Tree? We believe it is one of the exotic's on the playing field at the front of the school? Is this true? How and why did it become a notable tree? And if it is, then how can we change it to another/other trees.

Your help in this is much appreciated.

Mauriora, si

On behalf of, Taitā College.

Saritha Shetty

From: [REDACTED]
Sent: Monday, 11 December 2023 3:26 pm
To: District Plan Review Team
Subject: Re: [EXTERNAL] [REDACTED]
Attachments: image001.png

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Thanks for the prompt response.

I'll speak with my husband and determine if we want to proceed with any feedback or have questions.

Tiare

On Mon, 11 Dec 2023, 14:56 District Plan Review Team, <district.plan@huttcity.govt.nz> wrote:

Hi Tiare and Peter,

The draft plan's proposal for your property is to rezone it to a new zone, the Mixed Use Zone. This zone is probably the most flexible of our proposed zones, and if the draft plan went ahead as-is it would allow you the flexibility to use your site for small-scale commercial or community purposes, or residential, or a combination, or to keep your property as-is. It would allow buildings of a similar scale to the High Density Residential Zone in the surrounding area in Alicetown – buildings of up to six storeys. I've attached a map showing the proposed zoning of your site in the context of the surrounding area: pink is Mixed Use, peach is the Alicetown Local Centre, light purple is Light Industrial, and orange is High Density Residential:



Unlike other Commercial zones, the Mixed Use Zone would allow you to use (or keep using) your property purely for residential purposes, and allows (but doesn't require) houses to be set back from the street and landscaped. Unlike residential zones, the Mixed Use Zone would allow you to cover the site with impervious surfaces like concrete (the residential zones would limit impervious surfaces and buildings to 70% of the site).

Some links to our website that you might find useful:

- Factsheet on the Commercial and Mixed Use Zones: <https://www.huttcity.govt.nz/council/district-plan/district-plan-review/fact-sheet-links/commercial-and-mixed-use-zones>
- Feedback survey, if you want to have your say: <https://haveyoursay.huttcity.govt.nz/draft-district-plan>
- Full text of the Mixed Use Zone: <https://huttcity.isoplan.co.nz/review/rules/0/71/0/0/0/25>

The draft plan is a tool for engagement and so doesn't impact you directly yet. I encourage you to have your say on the draft plan, you can use the survey form above or email us.

I hope that's answered your questions, but if there's anything else you'd like to know, just ask.

Kind regards,

Stephen Davis

04 570 7426

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt

P: 04 570 6666 **M:** **W:** www.huttcity.govt.nz



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From: [REDACTED]
Sent: Monday, December 11, 2023 1:22 PM
To: District Plan Team <DistrictPlan.Team@huttcity.govt.nz>
Subject: [EXTERNAL] [REDACTED]

Hi, we've had a look at the draft plan and we want to know how this impacts us directly please?

And what are our options?

We recently concreted a lot of our property. Put a deck on, boxed gardens and have improved it a lot basically.

Please advise asap how we're directly impacted and what our options are. We're meant to do a submission by the 15th Dec

Thanks,

[REDACTED]





Saritha Shetty

From: [REDACTED]
Sent: Thursday, 23 November 2023 1:02 pm
To: District Plan Review Team
Subject: [EXTERNAL] Historic heritage - [REDACTED]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Nathan

Dear Hutt City

We are delighted to be afforded the chance to offer feedback on the draft District Plan.

We completely understand the RMA requirement to protect historic heritage from inappropriate subdivision, use and development.

At the same time we think it is vital the Hutt City Council make common sense decisions when it comes to “what constitutes historic heritage”.

Our property at [REDACTED] was indeed built by Ernst Plischke and was at the time of building a unique piece of architecture. However, over the course of the decades there have been substantial changes made to its original design, to the point where the original and the current house are very different. The alterations include the addition of an indoor pool and a completely new second storey addition with three rooms and a bathroom. To suggest the property should be protected as historic heritage would be telling a lie. It has been significantly altered. It is important to stress that none of these alterations were made under our ownership. Indeed the majority happened under the previous owner of 42 years.

When we purchased the property in January 2021, we were unaware of any effort the Council had previously made to heritage list the property. Neither the real estate agent or owner gave us any information. It wasn't until we received a letter from Hutt City Council about a year ago that we became aware and made enquiries with the previous owner. He then shared with us a large portfolio of work that he had put in, through his lawyers, to defend the property from heritage listing. We imagine the Council maintains its own collection of these files.

While we have no intention of altering or developing the property in a way that would remove any remaining Plischke elements, we would again stress the fact it no longer represents the original design elements of Plischke.

We would also be interested to better understand the legalities of a purchaser not being advised of Council's unsuccessful efforts over many years to heritage list a property? In this scenario surely the previous owner, real estate agent and/or Council all have some sort of obligation to divulge this type of information to a prospective buyer?

Kind regards
[REDACTED]

Sent from my iPhone

Saritha Shetty

From: [REDACTED]
Sent: Tuesday, 21 November 2023 12:17 pm
To: District Plan Team
Subject: [EXTERNAL] [REDACTED] - zoning

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Hi

I received a letter dated 8 November 2023 from Jo Miller outlining Hutt City Councils proposed rezoning as part of the Draft District Plan changes that may affect property owned by Bruce McLean and myself.

In this letter it suggests our property is currently zoned as Medium Density Residential, and this may change to Large Lot Residential zoning. Our property [REDACTED] is currently on the market and will affect decisions made by potential buyers. Could you clarify what the current zoning is for both [REDACTED] Prior to receiving this letter I was of the understanding it was zoned Hill Residential.

Is it also the case that if the letter was mistaken to suggest [REDACTED] is zoned Medium Density Residential, that it may still be affected by zoning changes?

As I indicated, our property [REDACTED] is currently on the market and am in discussion with interested parties so it would be beneficial to get clarity on this without delay. Look forward to your response.

Kind regards

[REDACTED]

Saritha Shetty

From: District Plan Review Team
Sent: Tuesday, 9 January 2024 2:44 pm
To: [REDACTED]
Subject: RE: [EXTERNAL] Property ID 2138203 - [REDACTED]
Attachments: [REDACTED] - LLRZ.pdf

Hello Suyash

Thank you for your email. I have provided a response to each of your questions below;

1. Please electronically resend a copy of that letter to this email address; and
[See attached.](#)

2. Express in terms of square meterage, the maximum size of dwelling that can be added to the existing dwelling or for an additional dwelling;

[Under the draft provisions for the Large Lot Residential Zone](#), a site which exceeds 1000m² may have a primary dwelling, and a secondary minor dwelling. There is no specific maximum size requirement for such dwellings. However their size and placement would be subject to development standards such as building coverage (35%) and boundary setbacks (1m from side and rear boundaries). If a proposal does not comply with one of these or any other District Plan rule then resource consent would be required.

3. If there is permission to build an additional dwelling, please advise where this can be built as our current understanding is that most of our section (that slopes into the hill) is Reserve Council Land that cannot be used for building purposes.

The District Plan is not so directive as to say where an additional dwelling could be specifically situated. The District Plan provides a broad set of rules. If any proposal does not comply with a rule, then through the resource consent process the effects of the non-compliance would be considered in light of the circumstances of the site and proposal.

With regards to developing on a slope, the proposal would also be subject to rules in the Earthworks chapter. The rear boundary of your property abuts Council reserve, but your property itself is not Council reserve. I am not aware if there are any restrictive covenants on your property title, if so such restrictions would not be affected by the District Plan.

The District Plan review is a relatively early stage, and will continue to be developed based on the feedback received through the draft consultation.

Some further information on the draft District Plan can be accessed via the following links;

- You can find an overview of the district plan review [here](#).
- The chapter for the Large Lot Residential Zone can be viewed [here](#).
- The Earthworks chapter can be viewed [here](#).
- The draft District Plan maps showing the proposed zones and overlays can be viewed [here](#).

Kind regards,
Peter

From: [REDACTED]
Sent: Saturday, January 6, 2024 11:40 AM
To: ContactHCC <contact@huttcity.govt.nz>
Subject: [EXTERNAL] Property ID 2138203 - [REDACTED]

Dear colleagues.

I introduce myself as [REDACTED] from Wellington.

My wife [REDACTED] and I are the shareholders and directors of Shree Guru Kripa Limited (a Look Through Company) which is the registered owner of the property located at [REDACTED] Lower Hutt.

A few months ago, we received a letter from the Hutt City Council notifying us that [REDACTED] was impacted by some recent changes to the Density Housing plans in the Lower Hutt area. The letter said that we could now expand the [REDACTED] to accommodate a granny flat etc.

Unfortunately, we appear to have misplaced your letter. Therefore, I would be grateful if you would:

1. Please electronically resend a copy of that letter to this email address; and
2. Express in terms of square meterage, the maximum size of dwelling that can be added to the existing dwelling or for an additional dwelling;
3. If there is permission to build an additional dwelling, please advise where this can be built as our current understanding is that most of our section (that slopes into the hill) is Reserve Council Land that cannot be used for building purposes.

I look forward to your response soon.

Thanks & best regards

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Friday, 15 December 2023 12:14 pm
To: District Plan Review Team
Subject: [EXTERNAL] submission to district plan review
Attachments: pdf submission to HCC 15 Dec 2023.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Nathan

Hi
Please find my submission attached. I would like to make a verbal submission as well, if possible, when the time is appropriate.

Kind regards
Susan

[REDACTED]
[REDACTED]
14 Dec 2023.

Submission to HCC's Lower Hutt Draft District Plan

Provided in confidence.

If possible, I would like to make a verbal submission to the Review in addition to what I have provided here.

Thank you for the opportunity to contribute to this plan. In my view the draft would benefit from a new section which ensures there is an automatic review by a RMA Commissioner of HCC resource consent decisions in relation to residential development whenever a non-notified HCC decision receives a challenge from a member of the public, business or other entity.

At the moment, as far as I am aware, and based on my own experience, the only credible options available for someone seeking an objective review of a HCC resource consent decision are i) the Environment Court or ii) the Ombudsman. Based on my own experience I do not rate HCC internal reviews of their own consent decisions – upon receipt of a challenge - as a credible third option. An automatic referral to a RMA commissioner would be an objective, credible, timely and cost-effective option that complements the two options currently available (i.e. the Environment Court and the Ombudsman).

It's not controversial to say that all public agencies – including local authorities - should have formal processes whereby the public can challenge their decisions and have their concerns reviewed with objectivity. Public officials, after all, are not infallible, and resource consent applicants are not always honest. Mistakes get made.

The consequences of HCC resource consent mistakes are grim: natural hazards are made worse; unstable structures are built placing occupants and neighbours, and neighbouring properties, at risk (and not all of these risks are insurable); lives may be lost.

When the consequences of poor HCC consent decisions materialise – as they will eventually - the passage of time makes it difficult to pin the cause on HCC consent mistakes. Instead, homeowners at the time, their insurers, and mortgage lenders bear the full brunt of the losses that occur. However, insurance firms and banks are not fools. They know well the risks that are created by poor HCC consenting decisions.

If insurers and banks form the view that HCC is delivering poor consent decisions – or that their processes and culture make that outcome likely - insurance premiums for everyone in the district will increase and fewer people will get the mortgages they need to build homes. There is no need for the risks created by poor quality consent decisions to materialise for HCC consent mistakes to have an immediate adverse effect on everyone in the district.

In the past, when resource consents were more likely to be notified, important relevant information – omitted or misrepresented either accidentally or intentionally by applicants – could be detected by third parties in the pre-decision notification phase. This helped achieve high-quality, subsequently uncontested consent decisions. All the wrinkles were ironed out in the notification phase. The untidy mess of having to withdraw or significantly amend a consent decision once a project had begun was avoided.

Now – the same omissions and mis-representations by applicants may occur – but they can only be detected by third parties once consents have been issued (the necessary public announcement only occurs after the decision is made). This makes real the prospect of a large mess of withdrawn or amended consents after a project has begun – assuming a local authority acts with integrity and owns up to its mistakes.

I am sure HCC would like to believe that the prospect of starting a project only to have the consent withdrawn or significantly amended keeps applicants honest and forthcoming with HCC in the application stage. But based on what I have experienced and observed I believe this to be a naïve view. In contrast, what I believe has happened – and what I believe less scrupulous developers and builders, and others close to HCC, may have noticed as well – is that HCC appears to have zero appetite to face the embarrassment of withdrawing consents or amending consent decisions irrespective of the quality of the decision to issue the original consent.

When a council decides, as a matter of ‘policy’, not to do the right thing when it becomes clear they have made a mistake in issuing a resource consent the consequences are dire for their community, as explained above.

I believe it takes years – if not decades - to change embedded, self-serving cultures in public agencies. But we can build in protections for the public that take effect right away. The Resource Management Act creates RMA Commissioners who can make consenting decisions on a local authority’s behalf. If HCC is required, by the District Plan, to engage a RMA Commissioner to review a consent decision that has received a challenge, consenting mistakes will be identified and the necessary consent amendments and withdrawals can occur.

The prospect of a credible objective review, with corrective action if required, will act as a real deterrent to any applicants who might otherwise consider omitting or misrepresenting relevant information when applying to HCC for consents.

I am aware that the Ombudsman’s office is currently investigating a resource consent issued by HCC in 2022 for a development in Days Bay. Perhaps there are many more investigations occurring. Based on what I have seen, unless the District Plan builds in the protection for the public that I recommend, I do not see HCC retaining its consenting status a few years hence. In my opinion local authorities who do not exercise their powers with care should not – and don’t - get to keep them very long.

Yours sincerely

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Wednesday, 15 November 2023 5:16 pm
To: District Plan Review Team
Subject: Re: [EXTERNAL] Draft district plan proposal.
Attachments: noname

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Stephen.

Thanks for the reply, after owning this property for approximately 20 years on a residential basis, it would appear that the current tenants will be looking for another Home. Very hypothetical, but quite likely.

What time frame will apply with the rezoning of this property?

Looking forward to your reply.

Regards
[REDACTED]

On Wed, 15 Nov 2023, 16:48 District Plan Review Team, <district.plan@huttcity.govt.nz> wrote:

[REDACTED]

Rezoning to Mixed Use Zone would not in itself affect your rates. You will continue paying rates in your current category (e.g. residential) unless and until you change the use of the site, and at the current property value until it's revalued (the next round is in 2025). Conceivably being zoned for commercial activity could increase the value of your property and thus rates once the property is revalued, or likewise reduce the value of the property and thus rates. However, we can't really predict what will happen. In the past in Hutt City, commercial zoning hasn't increased or decreased the value of land significantly.

The Mixed Use Zone allows for all the residential activities allowed in residential zones, grocery stores, cafes, and other small scale commercial or community activities up to 200m² per site, subject to various conditions. For full details you can see the draft plan text via our website at <https://hutt.city/dpreview> or give feedback using our survey form. Or if you've got any other questions let me know.

Kind regards,

Stephen Davis

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt

P: 04 570 6666 M: W: www.huttcity.govt.nz



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From: [REDACTED]
Sent: Wednesday, November 15, 2023 4:30 PM
To: District Plan Team <DistrictPlan.Team@huttcity.govt.nz>
Subject: [EXTERNAL] Draft district plan proposal.

Hello.

Re. [REDACTED]

I received your letter today, a couple of questions.

Mixed use zone , this means you can do many different activities on this property.

Currently it is a residential zone.

Proposal of a Mixture use zone, , does this mean that the rates will increase?

Also , what limitations of land use will apply,? (Proposal.)

As. Rate payer, you have probably devalued this residential property, in one move by changing the land use.

Looking forward to hearing from you , with some further information , details, clarification, answers to your questions.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

Saritha Shetty

From: casey diver <divercase@gmail.com>
Sent: Friday, 15 December 2023 7:52 am
To: District Plan Review Team
Subject: [EXTERNAL] Stokes Valley Football Club District Plan Submission

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Kia ora,

Stokes Valley Football Club Inc would like to make a submission to the draft District Plan.

We support the change from having two types of Open Space Zones to three:
Natural Open Space
Open Space Zone
Sport and Active Recreation Zone.

In line with that we would like to submit to the District Plan the following Change:

Should the District Plan adopt the proposed zone changes we would propose that Holborn Park located between 156-158A Holborn Drive Stokes Valley be redistricted from Reserve Land to Sport and Active Recreation Zone. That the land be brought under Hutt City Council's management after the redistricting therein for maintenance and management and general regular upkeep.

We are happy to submit in person on this item.

Nga mihi,

Casey Diver

Stokes Valley Football Club Inc



Hutt City Council

By Email: district.plan@huttcity.govt.nz

Dear Sir/Madam

21 December 2023

FEEDBACK: DRAFT HUTT CITY DISTRICT PLAN – SUBDIVISION STANDARD TELECOMMUNICATION

1. SUB-S7 - Power Supply and Telecommunications

- 1.1. Telecommunications providers (the Companies) which include Spark New Zealand Trading Limited (Spark), One New Zealand Group Limited (One NZ – formerly Vodafone New Zealand Limited), Connexa Limited and FortySouth (the trading name of Aotearoa Towers Group) support SUB-S7 but have some drafting comments as set out below that may assist. We are aware that Chorus has a different position. The Companies are trying to resolve this difference of position.
- 1.2. Note that Tom Anderson Incite has already provided our combined feedback on the draft District Plan.
- 1.3. Access to telecommunications connectivity is essential across Hutt City. Telecommunications connections can be provided via wireless and/or fixed line i.e. fibre. Our customers and users expect to have a variety of options of service providers and products. The challenge we face is knowing when and where new subdivisions and development occurring that will require upgrading of the network or construction new network e.g. a new cell-site. New networks (both fixed line and wireless) need to be open access, so people have choice of telecommunication provider and products. Telecommunications in New Zealand is delivered with the expectation of open competition and chance for everyone.
- 1.4. Traditionally in urban areas during a subdivision open access fibre connections are constructed. If, for example, open access fibre is not provided at the time of subdivision digging up the road berm to provide fibre to customer at the later date is expensive and disruptive. The government funded and co-ordinated by Crown Infrastructure Partners, ultra-fast broadband project to replace copper line with fibre in urban means that there has

been an expectation of fibre connections to be available to new lots. In rural areas copper lines are being replaced with access to wireless connectivity another partly via the government Rural Broadband projects. Noting that the Rural Broadband Infrastructure (RBI) is also co-ordinated and funded via Crown Infrastructure Partners (CIP). The funding in large part is from levy on the telecommunications industry. CIP is partnering with the Rural Connectivity Group (RCG) (a joint venture between Spark, Vodafone and 2 degrees) to provide RBI coverage. Telecommunication network operators like Spark and One NZ privately fund their wireless networks in urban and rural areas.

- 1.5. In rural, new growth areas (large subdivisions) or where there are significant changes in housing density wireless connectivity may not be available or service is of a level unacceptable to user as the existing networks need upgrading for additional capacity or construction of additional cell-site/s. Only the wireless network operators such as Spark or One NZ can determine the capacity of their networks to support new urban and rural subdivisions/developments. People buying new lots in a subdivision should be made aware of what telecommunication services will be available or not. Developers rarely discuss with the wireless network operators the opportunity for telecommunications generated by their development. It is our experience that even though the NESTF 2016 provides for new sites in the road berm this is not positively accepted especially in a new subdivision/development. The expectation is that, if needed, a new cell-site required it will be planned and designed into the development. The key for us is developers working telecommunication network operators to design and construct necessary network. At the time of subdivision application there is proof and agreement as to what telecommunications will be provided.

- 1.6. Potential ideas for redrafting for telecommunication connections in SUB-S7:

All zones

1. Provision of the design and construction of the open access telecommunication connections to service each new allotment.

Matters of discretion:

1. The extent to which the proposed telecommunications supply is sufficient for the subdivision or development capacity or activity it serves.
2. Where any reticulated telecommunications system is not immediately available but is likely to be in the near future, the appropriateness of temporary supply solutions.
3. Whether any site constraints make compliance impracticable.
4. If no telecommunications connections can be provided or telecommunication service is limited provide an assessment from telecommunication network operator as to why no connectivity can be constructed and the method by which prospective

purchasers of each site will to be informed that no or limited connectivity is or have not been installed.

Alternatively

1. In Urban zones including Residential Zones, Commercial and Mixed-Use Zones, and General Industrial Zones provide connection to an open access fibre network to the useable area of each new allotment; and
2. In Rural Zones or if the subdivision creates 100 or more allotments:
 - a. provide an assessment by telecommunication network operator/s of the open access telecommunications available and the design and construction of telecommunication connection/s to service each lot.
 - b. In Rural zones only, if no telecommunications connections can be provided or the service is limited provide an assessment from telecommunication network operator/s as to why no connectivity can be provided and the method by which prospective purchasers of each site will to be informed that no or limited connectivity is or have not been installed.

Matters of discretion:

1. The extent to which the proposed telecommunications supply is sufficient for the subdivision or development capacity or activity it serves.
2. Where any reticulated telecommunications and power supply system is not immediately available but is likely to be in the near future, the appropriateness of temporary supply solutions.
3. Whether any site constraints make compliance impracticable.
4. If no telecommunications connections can be provided or telecommunication service is limited provide an assessment from telecommunication network operator as to why no connectivity can be constructed and the method by which prospective purchasers of each site will to be informed that no or limited connectivity is or have not been installed.

We look forward to a workshop on telecommunications for Hutt City before the proposed plan is notified. If there are any questions, please contact the undersigned.

Ngā mihi

Graeme McCarrison

Planning and Engagement Manager - Spark

+64 274 811 816

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Colin Clune

Planning Manager - FortySouth

+64 21 0292 9905

Colin.clune@fortysouth.co.nz

Fiona Matthews

Planning Manager - Connexa

+64 21 772 005

Fiona.Matthews@connexa.co.nz

Saritha Shetty

From: Graeme McCarrison <Graeme.McCarrison@spark.co.nz>
Sent: Thursday, 21 December 2023 2:59 pm
To: District Plan Review Team
Subject: [EXTERNAL] FW: FEEDBACK: DRAFT HUTT CITY DISTRICT PLAN – SUBDIVISION STANDARD TELELCOMMUNICATION SUB-S7
Attachments: Telco excluding Chorus subdivison comments Dec 2023.pdf
Categories: Sean

Kia ora

Apologies for the late feedback on from Spark, One NZ, Connexa and Fortysouth on SUB-S7. Tom Anderson, Incite, has already provided our combined telecommunications feedback.

Looking forward to meeting up in early 2024 to workshop our feedback with other network utilities before the proposed district plan gets notified.
Have a relaxing and engersising holiday.

Ngā mihi
Graeme



Graeme McCarrison
Planning & Engagement Manager
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Saritha Shetty

From: [REDACTED]
Sent: Monday, 27 November 2023 5:24 pm
To: District Plan Team
Subject: [EXTERNAL] Draft district plan
Attachments: TE AWA KAIRANGI.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Check if replied, Sean

Hi

I received this letter in the post

I have two properties in Kelson so wondering which one this applies to
?

[REDACTED]

???

Also both properties are only around 500m² yet the letter states that the minimum lot size for the “large lot residential zone “ is 1000m².

Can you pls clarify and advise why my property would be rezoned if it’s not anywhere near 1000m²??!

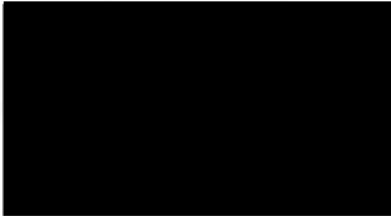
Thanks

[REDACTED]

Sent from my iPhone



8 November 2023



Kia ora,

I'm getting in touch to let you know that your property may be affected by proposed changes in the Hutt City Council Draft District Plan, which is now open for public feedback until 15 December 2023.

The District Plan is the rulebook for land use and development across the city. As part of an extensive review, we're proposing a range of changes as we work to manage the risks of natural hazards, protect the environment and our heritage, and make room for population and business growth.

Engaging with the community on the Draft District Plan is an optional step that Council has chosen to do to ensure that the views of the community are heard as part of this review.

The Draft District Plan proposes **rezoning** some properties from the Medium Density Residential Zone to the **Large Lot Residential Zone**, including your property.

The Large Lot Residential Zone applies to areas where there are constraints to more intensive development, such as steep slopes or a lack of infrastructure.

The main difference between the two zones is the level of development that can take place within the zone.

- The Medium Density Residential Zone provides for three dwellings per site, and three-storey buildings.
- The Large Lot Residential Zone would provide for a single dwelling per site *plus a minor additional dwelling (such as a granny flat)*. The Large Lot Residential Zone would also have a minimum lot size of 1000m².



The proposed rules would not impact existing development. They would only impact future development for additional residential units in these areas.

Community feedback is an important part of making sure we get our new District Plan right and I encourage you to give feedback on this and any other part of the draft at hutt.city/dpreview by 15 December. You can also visit the Council offices at 30 Laings Rd or any neighbourhood hub to drop off a written submission.

We'll take all the feedback on board, then prepare a proposed District Plan for formal submissions later in 2024.

Please note that it is possible that you may receive more than one letter relating to potential changes affecting your property in the draft plan. Please contact us at dpreview@huttcity.govt.nz if you have any questions.

Ngā mihi nui



Jo Miller

Chief Executive

Saritha Shetty

From: Sonia Dolan <Sonia.Dolan@education.govt.nz>
Sent: Monday, 11 December 2023 3:55 pm
To: District Plan Review Team; Sean Bellamy
Cc: Shelley Govier; Alex Hamlyn; Te Rangipai Renata; Stephen Keatley
Subject: RE: [EXTERNAL] Hutt Intermediate - Kauri Street, Lower Hutt

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Kia Ora Stephen and Sean

Stephen Keatley is sick today, however yes I can confirm myself and Te Rangipai will be meeting with HCC on Thursday

Happy to discuss as well as I have a planning background – policy and consents, so can add this on going forward. Stephen Keatley I will add you to our invite? As the heritage notification is all part of the school network discussion for how schools might be affected by the District Plan review as well as the policy growth issues.

1. We can discuss the growth plans/ Future Development Strategy and its influence for HCC – 930am-10am
2. We can discuss the District Plan review and its implications for the 2nd half of the hui – 10am-1030am

Nga Mihi

Sonia Dolan | Lead Advisor Network
Te Mahau | Te Tai Runga
DDI +6444395424 | Mobile +64272808969

From: District Plan Review Team <district.plan@huttcity.govt.nz>
Sent: Monday, 11 December 2023 10:21 am
To: Stephen Keatley <Stephen.Keatley@education.govt.nz>
Cc: Shelley Govier <Shelley.Govier@education.govt.nz>; Alex Hamlyn <Alex.Hamlyn@education.govt.nz>; Sonia Dolan <Sonia.Dolan@education.govt.nz>; Te Rangipai Renata <TeRangipai.Renata@education.govt.nz>; Sean Bellamy <Sean.Bellamy@huttcity.govt.nz>
Subject: RE: [EXTERNAL] Hutt Intermediate - Kauri Street, Lower Hutt

You don't often get email from district.plan@huttcity.govt.nz. [Learn why this is important](#)

Hi Stephen,

I've checked in with Sean Bellamy in our team, who's handling designations in the district plan review. I understand your Ministry has already got a meeting planned with us this Thursday – you might want to come along to this as well, although we can also set up a separate meeting about heritage if you prefer.

For your question:

Is there a reason why the letters were not made out to the owner, e.g. the crown as well?

You'll appreciate these are part of bulk mailouts sent out to hundreds or thousands of addresses, and so we rely on the accuracy of the contact address the owner has provided. If you want to update your address for service for your properties in Lower Hutt, email rates@huttcity.govt.nz. We did also send the Ministry a general email about the draft district plan in November.

Kind regards,
Stephen Davis

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt
P: 04 570 6666 M: W: www.huttcity.govt.nz



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From: Stephen Keatley <Stephen.Keatley@education.govt.nz>
Sent: Friday, December 8, 2023 2:56 PM
To: District Plan Review Team <district.plan@huttcity.govt.nz>
Cc: Shelley Govier <Shelley.Govier@education.govt.nz>; Alex Hamlyn <Alex.Hamlyn@education.govt.nz>
Subject: RE: [EXTERNAL] Hutt Intermediate - Kauri Street, Lower Hutt

Thanks Stephen for coming back to me so soon. I will discuss with my ministry colleagues. Our understanding was that the proposed heritage proposal was removed after meeting with the Ministry person and Beca in 2022.

Is there a reason why the letters were not made out to the owner, e.g. the crown as well? The school have a lease agreement for use of the land and buildings and I would have thought you would be required to notify the owner as well. We are still planning on redeveloping this site and have just completed Master planning.

We will be back in touch and may request a meeting.

Ngā mihi

Stephen Keatley | Infrastructure Manager - Wellington Region
Te Puna Hanganga, Matihiko | Infrastructure & Digital
DDI +6444637701 | Mobile +64272845803

From: District Plan Review Team <district.plan@huttcity.govt.nz>
Sent: Friday, 8 December 2023 2:28 pm
To: Stephen Keatley <Stephen.Keatley@education.govt.nz>
Cc: Shelley Govier <Shelley.Govier@education.govt.nz>; Alex Hamlyn <Alex.Hamlyn@education.govt.nz>
Subject: RE: [EXTERNAL] Hutt Intermediate - Kauri Street, Lower Hutt

You don't often get email from district.plan@huttcity.govt.nz. [Learn why this is important](#)

Hi Stephen,

As part of our district plan review of heritage, we previously sent letters to the Board of Trustees for Hutt Intermediate in March 2021, November 2021, and November of this year. If you no longer have copies I have attached them for your reference. We also discussed the implications of the heritage listing for Hutt Intermediate's development plans with your consultant planner from BECA in December 2021.

There's a high level factsheet about our approach to heritage at <https://www.huttcity.govt.nz/council/district-plan/district-plan-review/fact-sheet-links/heritage> and some more detailed information about the process so far at <https://www.huttcity.govt.nz/council/district-plan/district-plan-review/cultural-heritage>, including the technical reports behind the identification of Hutt Intermediate. (See the main report at <https://hccpublicdocs.azurewebsites.net/api/download/c9be9b889d1746e2b710f382e92d32e8/dplanreview/62c6cfe032383da348a2b3f35ad981007372>, and listing H2-40 in the report "Schedule of non-HNZPT listed items" at <https://hccpublicdocs.azurewebsites.net/api/download/c9be9b889d1746e2b710f382e92d32e8/dplanreview/b3d99cf63235356e48639a0b5f0291b73f6a>).

If you've got any other questions about the draft district plan let me know. If you want to give feedback on the draft plan, you can email us, or use the survey form on our website at <https://www.huttcity.govt.nz/council/district-plan/district-plan-review>. We're also able to meet in person or by phone if you want.

Kind regards,
Stephen Davis

District Plan Review Team

Hutt City Council, 30 Laings Road, Lower Hutt
P: 04 570 6666 M: W: www.huttcity.govt.nz



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From: Stephen Keatley <Stephen.Keatley@education.govt.nz>
Sent: Friday, December 8, 2023 10:50 AM
To: District Plan Review Team <district.plan@huttcity.govt.nz>
Cc: Shelley Govier <Shelley.Govier@education.govt.nz>; Alex Hamlyn <Alex.Hamlyn@education.govt.nz>
Subject: [EXTERNAL] Hutt Intermediate - Kauri Street, Lower Hutt
Importance: High

Kia ora,

I was reviewing your draft district plan and noticed that Hutt Intermediate School is listed as #140 on the heritage schedule, however is not on the current live heritage list.

Can you please provide an explanation why this school is on the draft list, as I cannot find any formal notification to the Ministry of Education?

Look forward to hearing back from you soon.

Ngā mihi

Stephen Keatley | Infrastructure Manager - Wellington Region
Te Puna Hanganga, Matihiko | Infrastructure & Digital

DDI +6444637701 | Mobile +64272845803
Lower Hutt Office

[education.govt.nz](https://www.education.govt.nz)

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Saritha Shetty

From: [REDACTED]
Sent: Sunday, 10 December 2023 4:24 pm
To: District Plan Review Team
Subject: [EXTERNAL] LLRZ – Large Lot Residential Zone

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

This email serves to express my opinion on the draft District Plan specifically the inclusion of residential zoning of land as 'Large lot residential'.

While I am in support of this zoning in principle, specifically that its purpose is in part to “protect, maintain, and enhance the open natural character, amenity, ecological values, and slope stability of hillside residential areas of the city. I believe it is too restrictive in its current form and feel there is more ‘middle ground’ to be achieved between the allowable three separate dwellings of medium density zoned lots and one dwelling and a minor ‘granny flat’ of the large lot zones.

Firstly, the financial risks and increased costs associated with building on sloped land would act as a natural ‘market forces’ regulator on the size and scale of developments in the proposed zones. Land in these areas, no matter the zoning, wouldn’t be targeted by professional developers as the costs and uncertainty are undesirable. So it is unlikely that the visual appearance of the area would change over time at any rate comparable to the flatter areas of the valley. However, some sites may be able to be developed in a financially viable manner that also protects the unique character and ecological value of the area. For example, given the steep slope of some sites it may be possible to construct three units on-top of each other, terraced down the hillside (assuming engineering and stability design) with minimal impact to adjoining properties, the total site coverage of the lot and the ecology.

I feel as though the qualifying standards for development of the medium density zone could be applied to the proposed large lot zone but with certain restrictions. i.e a three unit development in the large lot zone should be permitted if it can suitably address the impacts of the built development on adjoining sites and the streetscape and appropriate stormwater management and the provision of open space for residents. A lower maximum site coverage area and adjusted height planes/shading could be applied to sloped sections in the valley. There could also be restrictions on how much of the site can be cleared of existing native vegetation.

If the lack of infrastructure of the area is an issue, then total development could be restricted on a first come first served basis. Sites in a particular area can be developed until the maximum units that can be supported by existing infrastructure is reached.

Any residential site in the city should be able to be equally developed to medium density levels if the project proposal can prove it will meet the requirements during the building consent process.

Sincerely

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Wednesday, 15 November 2023 5:59 pm
To: District Plan Team
Subject: [EXTERNAL] Draft District Plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Kia ora HCC

We received the letter in the mail today around the Draft District Plan.

I then went online to look at our property [REDACTED] to determine how we may be impacted.

When I looked at this, it prompted a couple questions which I hope you can help with.

1. Our property has two different zones on it. I can't see any others like that, so seems odd. Is that supposed to be the case?
2. When I was on the map online (on my phone) I couldn't see a key to outline what the different zones are and what they mean. Can you let me know what they are or where I can see this information?

Basically, I'm trying to determine what exactly the changes being proposed are as they relate to my property.

Thanks for your assistance.

[REDACTED]

Sent from my Galaxy

Saritha Shetty

From: [REDACTED]
Sent: Wednesday, 15 November 2023 11:31 pm
To: District Plan Review Team
Subject: Re: [EXTERNAL] Draft District Plan Survey and Natural Hazards

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Steve

Hi Stephen,

Thanks so much for the additional context! That's very helpful. Glad I can still fill out the survey.

Cheers,
[REDACTED]

Sent from my iPhone

> On Nov 15, 2023, at 2:35 PM, District Plan Review Team <district.plan@huttcity.govt.nz> wrote:

>

> [REDACTED]

>

> Yes, your part of Wainuiomata is unfortunately not mapped yet. There may or may not be flooding or earthquake hazards that affect you, we simply don't know. We're still waiting for Wellington Water to complete this work. But for the purpose of the draft district plan, this means there are no hazard overlays that would mean we need to introduce regulations to restrict development on your site. If and when we get updated modelling we'll need to reflect that in a future change to the district plan.

>

> You're still able to give feedback on how the natural hazard provisions work in general, which you might want to as Council will likely want to take a consistent approach across the city for all hazards of a particular type.

>

> Kind regards,

> Stephen Davis

> District Plan Review Team

>

>

>

>

> Hutt City Council, 30 Laings Road, Lower Hutt

>

> P: 04 570 6666 M: W: www.huttcity.govt.nzIMPORTANT: The information contained in this e-mail message may be legally privileged or confidential. The information is intended only for the recipient named in the e-mail message. If the reader of this e-mail message is not the intended recipient, you are notified that any use, copying or distribution of this e-mail message is prohibited. If you have received this e-mail message in error, please notify the sender immediately. Thank you

> -----Original Message-----

>

> Sent: Wednesday, November 15, 2023 1:46 PM

> To: District Plan Team <DistrictPlan.Team@huttcity.govt.nz>

> Subject: [EXTERNAL] Draft District Plan Survey and Natural Hazards

>

> Hi there,
>
> I live at [REDACTED] and was looking at the natural hazards for my address but can't see any listed.
>
> I see with other areas in Lower Hutt, hazards are already mapped and available. Is my part of Wainuiomata not mapped yet or are there simply no identified hazards?
>
> I know some work was ongoing with Wellington Water to map flood risks for my area, but I don't think this is complete. Do you know if hazard mapping has been done for my address?
>
> It's difficult to give feedback on something with limited information on how my property could be affected.
>
> Thanks,
> [REDACTED]
>
> Sent from my iPhone

26/11/2023

To Whom it may concern

Lower Hutt City Council

Rezoning of Benmore Crescent, Manor Park

I am writing to express my deep concerns and opposition to the proposed rezoning of Benmore crescent to an industrial area. I believe that changing this area to an Industrial zone would have significant negative implications for the community and would like to bring the following points to your attention as my submission

Health and Environmental Impact: A rezoning within 35mtrs of our residential area poses a serious threat to the health and well-being of the residents. Industrial activity will generate unpleasant odours, noise pollution, and increased traffic congestion, all of which will have detrimental effects on the quality of life for all of us living here.. Furthermore, the potential for hazardous waste leaks or accidents can lead to severe environmental contamination, endangering both the immediate surroundings and the broader ecosystem. Risk of the Hutt River being contaminated is very possible. This proposed rezoning is within 35 meters from our boundaries to residential properties in Mary Huse Grove and is simply unfair to our residents.

Land Use Compatibility: Rezoning is inconsistent with the residential nature of the surrounding area. Residential neighbourhoods are intended to provide a peaceful and safe environment for families and individuals. Manor Park has an abundance of native birds, lizards, eels and trout and the community are working hard to protect these through our Pest Free Manor Park initiatives. We were recently given Predator Free New Zealand Community Grant to assist with this work. Having the land re-zoned as industrial will destroy natural habitats of the fish & wildlife in the area, it will likely increase pests & rodents, and increase the likelihood of pollution run off into neighbouring streams and waterways that feed into the Hutt River.

Noise/Traffic Disturbance-Industrial operations will generate high levels of noise, disrupting the tranquillity of Manor Park. It will attract a high volume of traffic, leading to congestion, increased emissions, and potential safety hazards for residents. The accessway to this area is right behind my back section and could potentially be trucks coming past day and night. This directly impacts my own well being. The proposed road is runs parallel to my back fence at 58 Mary Huse Grove.

Community Safety Concerns: Rezoning will attract an increased presence of large trucks, heavy machinery, and a high volume of materials being transported. These factors pose a risk to the safety of residents, particularly children and elderly individuals who we have many in our community now. The Manor Park Flyover is not fit for purpose to handle any increase in volume which was highlighted at the council meeting at the council chambers on the 18th October highlighting the residence concerns around traffic safety. We simply do not want hundreds of extra trucks coming in an out of Manor Park every week.

Social and Community Implications: The development may have far-reaching effects on the social fabric of our community, including strain on local services, and community cohesion. Stress on people in the neighbourhood would be unreasonable. A social impact assessment should be

conducted to understand the potential consequences of having an industrial zone in such a populated area like ours.

Infrastructure: Industrial zones often require substantial amounts of water, electricity, and other utilities. This increased demand will strain existing utility infrastructure, leading to potential shortages, increased costs, and the need for infrastructure upgrades. We already have major issues with Water Pipes in Manor Park and council has already outlined that this is already at maximum capacity. We have regular water mains bursting with outages in the streets of Manor Park regularly.

Decreased Property Values: The presence of an industrial area is likely to result in a decline in property values for homeowners in the vicinity. Potential buyers are likely to be deterred by the undesirable aspects associated with Industrial activity leading to a significant financial impact for residents who have invested their life savings into their homes. This decline in property values could have long-term consequences for the economic stability of the neighbourhood and the people that live here.

Alternative Locations: While we understand that some areas need rezoning and is a necessary function for Lower Hutt Council, it is essential to consider alternative locations for this. Industrial zones or areas that are less densely populated would be more appropriate for such zoning. By selecting a site away from residential areas, the council can ensure that the negative consequences mentioned above are minimized, preserving the quality of life for residents while still addressing council needs. There are more remote locations away from residential areas that should be considered like Silverstream or on the Western/Eastern hills away from residential zones.

Rezoning Preference-In my opinion we should allow a residential/urban zoning for this area. This would include residential areas where housing is the primary land and may include commercial spaces like shops, offices, and other non-industrial businesses. Maybe a mixture of these with some green areas built around the area too. This is far more consistent with what has been on that site previously and would be far more palatable for the residence of Manor Park. This would also mitigate a lot of the above issues mentioned in this submission.

I know that there are many residents here that are dissatisfied and have concerns with the possibility of this happening in our community and is very stressful for them. I urge the council to explore alternative locations that are more suitable for industrial type activity, taking into account the concerns and well-being of the affected community. We are rate paying people and deserve to be treated with respect with our living environment. Open and transparent communication with notification and consultation with the residents is crucial. I would appreciate updates on any developments or decisions made regarding this matter.

Thank you for your attention to this matter. I trust that you will carefully consider the concerns raised and make a decision that aligns with the best interests of the community in mind at Manor Park.

[REDACTED]

[REDACTED]

[REDACTED]

Saritha Shetty

From: [REDACTED]
Sent: Sunday, 26 November 2023 11:35 am
To: District Plan Review Team
Cc: Manor Park Community
Subject: [EXTERNAL] Submission for the Hutt District Plan-Rezoning of Benmore Crescent
Attachments: Submission to Council.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Sean

Hi There

Please find attached submission for proposed rezoning of Benmore Crescent, Lower Hutt

Kind Regards

[REDACTED]