

# Further Submission on publicly notified Proposed District Plan Change



Clause 8 of the First Schedule, Resource Management Act 1991

To: Chief Executive, Hutt City Council

1. **This is a further submission from:**

Full Name	<div style="display: flex; justify-content: space-between;"> <span><small>Last</small> Horrocks</span> <span><small>First</small> Jo</span> </div>	
Company/Organisation	Toka Tū Ake EQC	
Contact if different		
Address	PO Box 311, Wellington 6140	
Address for Service if different	<small>Postal Address</small>	<small>Courier Address</small>
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2. This is a **further submission** in support of or opposition to a submission on the following proposed change to the City of Lower Hutt District Plan:

**Proposed District Plan Change No:**

**Title of Proposed District Plan Change:**

3. I consider that under Clause 8 of the First Schedule of the Resource Management Act I may make a further submission because:

I represent a relevant aspect of the public interest

*Please give details:*

I have an interest in the Proposed Plan Change that is greater than the interest of the general public

*Please give details:* Toka Tū Ake EQC is a Crown Entity responsible for providing insurance to residential property owners against the impact of natural hazards. We also invest in and facilitate research and education about natural hazards, and methods of reducing or preventing natural hazard damage. The contingent liability associated with natural hazard risk in New Zealand is high and is carried, in large part, by Toka Tū Ake on behalf of the Crown. Toka Tū Ake therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand.

I represent Hutt City Council

Hutt City Council 30 Laings Road, Private Bag 31912, Lower Hutt 5040 www.huttcity.govt.nz (04) 570 6666

4. I support or oppose the submission of:

Name and address of original submitter and submission number of original submission:

Petone Community Board Submission 116

- pamhannapetone@gmail.com

Greater Wellington Regional Council Submission 149

- richard.sheild@gw.govt.nz

Argosy Property No. 1 Ltd. Submission 189

- bianca.tree@minterellison.co.nz

Kāinga Ora Homes and Communities Submission 206

- gurv.singh@kaingaora.govt.nz

Investore Property Ltd. Submission 258

- RebeccaS@barker.co.nz

(Please use additional pages if you wish)

5. The particular parts of the submission I support or oppose are:

**Petone Community Board Submission 116**

**SUPPORT 116.10 - Amendment 32**

*Ensure that safe evacuation is seen as a limitation in the hazard areas*

**Greater Wellington Regional Council Submission 149**

**SUPPORT 149.6 – Plan Change Entire**

*Remove residential areas in the high hazard coastal overlay earmarked as suitable for medium or high-density intensification in Petone and the east Harbour Bays.*

**SUPPORT 149.36 - Chapter 1.10.11**

*Amend (add underlined, remove strikethrough):*

*To avoid or ~~mitigate the vulnerability and risk of people and development to natural hazards.~~ Reduce minimise the risk to people, property and infrastructure from natural and coastal hazards*

**SUPPORT 149.40 - Chapter 1.10.11**

*Provide differentiation between the high and medium coastal hazard overlays to minimise development in the high coastal hazard overlay and manage development within the medium coastal hazard overlay.*

*Remove high and medium density residential areas from these overlays in Petone, Lowry Bay, Days Bay and Eastbourne.*

**SUPPORT 149.69 - Chapter 11 Section 11.1.3 Policy**

*Clause (bd) should be differentiated between high and medium coastal hazard areas - to minimise development in the high coastal hazard overlay and manage development within the medium coastal hazard overlay.*

**Argosy Property No. 1 Ltd. Submission 189**

**OPPOSE 189.4**

*Delete the hazard rankings, or alternatively reduce the hazard ranking for all tsunami hazards to 'low' to reflect that it is difficult to mitigate the risk of a tsunami.*

**Kāinga Ora Homes and Communities Submission 206**

**OPPOSE 206.14 Chapter 1 – 1.10.1A Urban Environment**

*Amend (add underlined, remove strikethrough):*

*Provide for building height and density of urban form that enables:*

*a) as much development capacity as possible within the Central Commercial Activity Area and Petone Commercial Activity Area - 2.*

*b) building heights of at least 6 storeys, with greater intensification enabled in identified Height Variation Control areas: i. within the Petone Commercial Activity Area - 1,*

*ii. within a walkable catchment of the Central Commercial and Petone Commercial Activity Areas,*

*c) building heights of at least 4-5 storeys adjacent to within a walkable catchment of the identified suburban centres, including of Eastbourne, Stokes Valley, and Wainuiomata,*

**OPPOSE 206.27 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

*Remove natural hazard flooding overlay(s) from the District Plan statutory maps, and instead hold this information in non-statutory GIS maps.*

**OPPOSE 206.28 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

*Create of new definitions to identify flood hazards in the Plan.*

**OPPOSE 206.29 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

*Amend rule framework to enable rules to be linked to newly defined terms of Flood Hazards.*

**OPPOSE 206.30 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

*Revise reference throughout plan from “flood hazard overlays” to “flood hazard areas”.*

**OPPOSE 206.31 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

*Consequential changes to give effect to this submission (regarding the flood hazard submission points above), including addition of definitions below,*

**OPPOSE 206.38 Chapter 1 – 1.10.11 Lessening Natural Hazards, Policy**

*Seeks to remove clause (c) ~~To limit the scale and density of development in areas where the risk of flooding is medium to high-~~*

**OPPOSE 206.39 Chapter 1 – 1.10.11 Lessening Natural Hazards, Explanation and Reasons – Flood Hazard**

*seeks consequential changes to give effect to the above submission points regarding flood hazard maps being outside of the District Plan.*

**OPPOSE 206.121 Chapter 4G – High Density Residential Activity Area Mapping**

*Add clause:*

*v. Increase the maximum heights to 36m (10 storeys) within a 400m/5-10min walkable catchment of the Petone commercial centre; demonstrated with a Height Variation Control overlay;*

**OPPOSE 206.165 Chapter 4G – High Density Residential Activity Area (Rules)**

*seeks changes to the maximum number of permitted units from 3 to 6, recognising that the HDRAA is an area that is explicitly enabling more intensive development.*

**OPPOSE 206.171 Chapter 4G – High Density Residential Activity Area (Rules)**

*Increase maximum height for Petone, Naenae, and Waterloo Commercial Activity Areas to 29m*

**OPPOSE 206.247 Chapter 5B Petone Commercial Activity Area Area 1**

*Seeks an increase in the height limit applicable to Petone Commercial Activity Area – Area 1 outside of the Jackson Street Heritage Precinct, from 22m to 53m.*

**OPPOSE 206.273 Chapter 5E Suburban Mixed Use Activity Area Entire chapter and zoning framework**

*Support height limit of 22m where proposed in PC56, and seek application of a broader 22m height limit across all other centres (other than identified in this submission across the Hutt City. Considers that there are a number of commercial centres in Hutt City that are considered local centres.*

**OPPOSE 206.295 Chapter 11 – Subdivision Policies of section 11.1.3 Natural Hazards**

*Seeks a simplified policy, which addresses the requirement to manage risk from natural hazards. An alternative policy is provided. Notes that the alternative policy refers to natural hazards identified in the District Plan. As noted elsewhere in this submission, opposes flood hazards being mapped in the Plan, and instead seeks definitions to appropriately identify such hazards in the plan. Take a risk-based approach to the management of subdivision of land affected by natural hazards and coastal hazards identified in the District Plan based on:*

*1. The sensitivity of the activities to the impacts of natural hazards; and*

*2. The hazard posed to people’s lives and wellbeing, and property, by considering the likelihood and consequences of differing natural hazard events.*

**OPPOSE 206.308 Chapter 14H Natural Hazards Flood Hazard Overlay**

*Remove natural hazard flooding overlay(s) from the District Plan statutory maps, and instead hold this information in non-statutory GIS maps.*

**OPPOSE 206.309 Chapter 14H Natural Hazards Flood Hazard Overlay**

*Create of new definitions to identify flood hazards in the Plan.*

**OPPOSE 206.310 Chapter 14H Natural Hazards Flood Hazard Overlay**

*Amend rule framework to enable rules to be linked to newly defined terms of Flood Hazards.*

**OPPOSE 206.311 Chapter 14H Natural Hazards Flood Hazard Overlay**

*Revise reference throughout plan to delete “flood hazard overlay”*

**OPPOSE 206.313 Chapter 14H Natural Hazards Introduction**

*Seeks removal of the use of “overlay” from the table identifying the Natural Hazards*

**OPPOSE 206.314 Chapter 14H Natural Hazards Introduction**

Seeks removal of reference to flood hazard maps under the "Overlay" section of the introduction. It is noted that Kāinga Ora has offered elsewhere in this submission additional definitions for flood hazards to ensure these are still identified in the District Plan.

**OPPOSE 206.317 Chapter 14H Natural Hazards Policy 14H 1.1 Levels of Risk**

Amendments are sought to give effect to the relief sought to remove reference to natural hazard overlays insofar as it relates to flooding.

**OPPOSE 206.318, 206.320, 206.322, 206.324, 206.326, Chapter 14H Natural Hazards Policy 14H 1.3, 1.4, 1.5, 1.6, 1.7**

seeks amendment to the policy chapeau to remove reference to the flood hazard overlay.

**OPPOSE 206.319, 206.321, 206.323, 206.325, 206.327 Chapter 14H Natural Hazards Policy 14H 1.3, 1.4, 1.5, 1.6, 1.7**

Seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.

**OPPOSE 206.328, 206.332, 206.334, 206.336 Chapter 14H Natural Hazards Rules Rule 14H 2.2, 2.3, 2.4, 2.5**

Seeks amendment to remove reference to the flood hazard overlay

**OPPOSE 206.331, 206.333, 206.335, 206.337 Chapter 14H Natural Hazards Rules Rule 14H 2.2, 2.3, 2.4, 2.5**

Seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.

**Investore Property Ltd. Submission 258**

**OPPOSE 258.4, 258.5, 258.6, 258.7 Natural Hazards – Policy 14H 1.1, 1.8**

Delete Policies 14H 1.1 and 14H 1.8 and Rules 14H 2.6 and 14H 2.10 and reconsider approach to managing risks in the Medium Coastal Hazard Area.

*(Please use additional pages if you wish)*

6. The reasons for my support or opposition are:

*Please give reasons:*

**Petone Community Board Submission 116**

**SUPPORT 116.10 - Amendment 32**

Evacuation from flooding, coastal inundation and tsunami is particularly important in areas of Petone where evacuation will be difficult and slow. The need for evacuation routes should be reflected in the District Plan. Please refer to our original submission and to Luovic et al (2017) tsunami evacuation modelling for Lower Hutt.

**Greater Wellington Regional Council Submission 149**

**SUPPORT 149.6 – Plan Change Entire**

As outlined in our original submission, Petone and Moera are areas at high risk from natural hazards where high-density development is not appropriate.

**SUPPORT 149.36 - Chapter 1.10.11**

We consider it appropriate for terminology to be consistent with GRWC proposed RPS Change 1 (based on standard risk based hazard management approaches), to be used throughout the HCC district plan. We agree that 'minimise' natural hazard risk provides clearer direction to bring risk in development to levels as low as reasonably practical.

**SUPPORT 149.40 - Chapter 1.10.11**

It is appropriate to avoid natural hazard risk in high risk areas, and manage or mitigate natural hazard risk in medium and low risk areas. Differentiation of these zones is important for consistent application of rules and policies.

High density development should not be zoned for areas at high risk of natural hazard.

**SUPPORT 149.69 - Chapter 11 Section 11.1.3 Policy**

It is appropriate to avoid natural hazard risk in high risk areas, and manage or mitigate natural hazard risk in medium and low risk areas. Differentiation of these zones is important for consistent application of rules and policies.

*Please give reasons:*

**Argosy Property No. 1 Ltd. Submission 189**

**OPPOSE 189.4 Natural Hazard Introduction**

The risk of a 1:100 year tsunami risk is classed as high despite being low probability because tsunamis are a very high impact hazard. While the trigger of a tsunami cannot be mitigated, the consequences can be reduced through good design, evacuation planning and communication of the risk. As parts of Petone cannot be evacuated in time from a local source event, land use planning options must be considered, particularly when combined with other hazards along the coast (e.g. sea level rise, storm surge, liquefaction). It is not appropriate to reduce the hazard ranking for all tsunamis to low given the high consequence of a tsunami occurring.

**Kāinga Ora Homes and Communities Submission 206**

**OPPOSE 206.14 Chapter 1 – 1.10.1A Urban Environment**

As outlined in our original submission, Petone and Eastbourne are at high risk of natural hazards and intensification should not be zoned for these areas. Buildings of greater size and height are more vulnerable to liquefaction, which the majority of Petone is at high risk for in the event of an earthquake. Petone is expected to subside by up to 2 m in the event of a Wellington Fault earthquake, meaning much of the suburb will be below sea level. Petone and Eastbourne are also at high risk of coastal inundation, flooding and tsunamis, risks which will increase in the near future with the effects of sea level rise and climate change. Increasing the number and density of residences and businesses in these areas will put more people at high risk from natural hazards and is not sustainable in the long term.

**OPPOSE 206.27 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

Accurate and risk-based regulatory hazard maps are an important tool in the HCC District plan to limit subdivision and development within areas subject to natural hazard risk. The maps also provide a way of identifying hazards for decision making. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.

**OPPOSE 206.28 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.29 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.30 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the HCC Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.31 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.38 Chapter 1 – 1.10.11 Lessening Natural Hazards, Policy**

The scale and density of development should be limited in all areas at risk from natural hazards. Flooding is the most common natural hazard faced in Aotearoa, and repeated flooding events can have severe effects on properties and the wellbeing of residents. Areas at high or medium risk from flooding should not be subject to intensification.

**OPPOSE 206.39 Chapter 1 – 1.10.11 Lessening Natural Hazards, Explanation and Reasons – Flood Hazard**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.121 Chapter 4G – High Density Residential Activity Area Mapping**

As outlined in our original submission, Petone is at high risk of natural hazard and intensification should not be zoned for these areas. Buildings of greater size and height are more vulnerable to liquefaction, which the majority of Petone is at high risk for in the event of an earthquake (GWRC liquefaction hazard maps).

**OPPOSE 206.165 Chapter 4G – High Density Residential Activity Area (Rules)**

As outlined in our original submission, much of Lower Hutt is at high risk of natural hazard and intensification should not be zoned for areas at risk. Petone, Alicetown, Moera, Seaview and Wainuiomata are at high risk for liquefaction in the event of an earthquake (GWRC Liquefaction hazard maps). Petone, Seaview, and Moera are expected to subside by up to 2 m in the event of a Wellington Fault earthquake (Townsend et al, 2015), meaning much of the area will be below sea level. Petone, Seaview and Eastbourne are at high risk of coastal inundation, flooding and tsunami (GWRC tsunami evacuation maps), and much of the Hutt Valley is at risk from flooding by the Hutt River (GWRC flood hazard maps), risks which will increase in the near future with the effects of sea level rise and climate change (NZ SeaRise project). Increasing the number and density of residences and businesses in these areas, without taking into account the need to avoid or minimise the risks from natural hazards will put more people at high risk from natural hazards and is not sustainable in the long term

**OPPOSE 206.171 Chapter 4G – High Density Residential Activity Area (Rules)**

As outlined in our original submission, Petone is at high risk of natural hazard and intensification should not be zoned for these areas. Buildings of greater size and height are more vulnerable to liquefaction, which the majority of Petone is at high risk for in the event of an earthquake (GWRC liquefaction hazard maps).

**OPPOSE 206.247 Chapter 5B Petone Commercial Activity Area Area 1**

As outlined in our original submission, Petone is at high risk of natural hazard and intensification should not be zoned for these areas. Buildings of greater size and height are more vulnerable to liquefaction, which the majority of Petone is at high risk for in the event of an earthquake (GWRC liquefaction hazard maps).

**OPPOSE 206.273 Chapter 5E Suburban Mixed Use Activity Area Entire chapter and zoning framework**

As outlined in our original submission, much of Lower Hutt is at high risk of natural hazard and intensification should not be zoned for these at risk. Buildings of greater size and height are more vulnerable to liquefaction, which the majority of Petone, Alicetown, Moera, Seaview and Wainuiomata are at high risk for in the event of an earthquake (GWRC Liquefaction hazard maps). Petone, Seaview, and Moera are expected to subside by up to 2 m in the event of a Wellington Fault earthquake (Townsend et al, 2015), meaning much of the area will be below sea level. Petone, Seaview and Eastbourne are at high risk of coastal inundation, flooding and tsunami (GWRC tsunami evacuation maps), and much of the Hutt valley is at risk from flooding by the Hutt River (GWRC flood hazard maps), risks which will increase in the near future with the effects of sea level rise and climate change (NZ SeaRise project). Increasing the number and density of residences and businesses in these areas, without taking into account the need to avoid or minimise the risks from natural hazards will put more people at high risk from natural hazards and is not sustainable in the long term

**OPPOSE 206.295 Chapter 11 – Subdivision Policies of section 11.1.3 Natural Hazards**

In the interests of clarity and consistency across the district plan, we support the HCC's original policy format of explicitly stating which hazards will have an effect on subdivision rules. We support the original wording which was wider in scope. We note that the current district plan maps do not include hazard overlays for liquefaction, storm surge, sea level rise, or land instability. By limiting the scope of the proposed new wording to natural hazards and coastal hazards identified in the District Plan, development within these known extents of other hazards are not being managed appropriately. Not using information to inform development will result in higher numbers of people and property being affected by hazard events.

**OPPOSE 206.308 Chapter 14H Natural Hazards Flood Hazard Overlay**

Accurate and risk-based regulatory hazard maps are an important tool in the HCC District Plan to limit subdivision and development within areas subject to natural hazard risk. Removing part or all of these regulatory maps opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.309 Chapter 14H Natural Hazards Flood Hazard Overlay**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.310 Chapter 14H Natural Hazards Flood Hazard Overlay**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.311 Chapter 14H Natural Hazards Flood Hazard Overlay**

MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the HCC Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.313 Chapter 14H Natural Hazards Introduction**

MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the HCC Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.314 Chapter 14H Natural Hazards Introduction**

MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the HCC Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.317 Chapter 14H Natural Hazards Policy 14H 1.1 Levels of Risk**

MfE discussion paper on National Planning Standards: Zones and Overlays supports the use of the term 'overlay' to mean mapped areas which "introduce more restrictive built form controls than apply to the underlying zone". As this is the purpose of the HCC Natural Hazard Overlays, the term should be retained. Regulatory natural hazard overlays, including for flood, are an important tool to limit subdivision and development within areas subject to natural hazard risk.

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard.

**OPPOSE 206.318, 206.320, 206.322, 206.324, 206.326, Chapter 14H Natural Hazards Policy 14H 1.3, 1.4, 1.5, 1.6, 1.7**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.319, 206.321, 206.323, 206.325, 206.327 Chapter 14H Natural Hazards Policy 14H 1.3, 1.4, 1.5, 1.6, 1.7**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.328, 206.332, 206.334, 206.336 Chapter 14H Natural Hazards Rules Rule 14H 2.2, 2.3, 2.4, 2.5**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**OPPOSE 206.331, 206.333, 206.335, 206.337 Chapter 14H Natural Hazards Rules Rule 14H 2.2, 2.3, 2.4, 2.5**

We oppose all proposed amendments made by Kāinga Ora which remove regulatory flood hazard mapping and rely on definitions of flood hazard to limit development in areas subject to flood hazard. Flooding is a likely event to occur, and development needs to take flooding into account to ensure the sustainability of any development into the future.

**Investore Property Ltd. Submission 258**

**OPPOSE 258.4, 258.5, 258.6, 258.7 Natural Hazards – Policy 14H 1.1, 1.8**

Deletion of these rules and policies will allow for less restrictive development and intensification within areas which are at high or medium risk from natural hazards. As outlined in our original submission, this includes areas of Petone, Moera, Seaview, and Eastbourne which are at risk from multiple natural hazards (refer to GWRC natural hazard information for comprehensive hazard maps), and where intensification is not appropriate and will not be sustainable in the long term.

7. I seek that the whole or part [*describe part*] of the submission be allowed or disallowed:

*Please give precise details:*

**Petone Community Board Submission 116**

**SUPPORT 116.10 - Amendment 32**

I seek that the whole of the submission be allowed

**Greater Wellington Regional Council Submission 149**

**SUPPORT 149.6 – Plan Change Entire**

I seek that the whole of the submission be allowed

**SUPPORT 149.36 - Chapter 1.10.11**

I seek that the whole of the submission be allowed

**SUPPORT 149.40 - Chapter 1.10.11**

I seek that the whole of the submission be allowed

**SUPPORT 149.69 - Chapter 11 Section 11.1.3 Policy**

I seek that the whole of the submission be allowed

**Argosy Property No. 1 Ltd. Submission 189**

**OPPOSE 189.4**

I seek that the whole of the submission be disallowed

**Kāinga Ora Homes and Communities Submission 206**

**OPPOSE 206.14 Chapter 1 – 1.10.1A Urban Environment**

I seek that the part of the submission regarding height and density of buildings in Petone and Eastbourne be disallowed

**OPPOSE 206.27 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.28 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.29 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.30 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.31 Chapter 1 – 1.10.11 Lessening Natural Hazards, Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.38 Chapter 1 – 1.10.11 Lessening Natural Hazards, Policy**

I seek that the part of the submission seeking to remove clause “(c) To limit the scale and density of development in areas where the risk of flooding is medium to high” be disallowed

**OPPOSE 206.39 Chapter 1 – 1.10.11 Lessening Natural Hazards, Explanation and Reasons – Flood Hazard**

I seek that the whole of the submission be disallowed

**OPPOSE 206.121 Chapter 4G – High Density Residential Activity Area Mapping**

I seek that the part of the submission adding clause “v. Increase the maximum heights to 36m (10 storeys) within a 400m/5-10min walkable catchment of the Petone commercial centre; demonstrated with a Height Variation Control overlay” be disallowed



**OPPOSE 206.171 Chapter 4G – High Density Residential Activity Area (Rules)**

I seek that the part of the submission regarding height and density of buildings in Petone and Eastbourne be disallowed

**OPPOSE 206.247 Chapter 5B Petone Commercial Activity Area Area 1**

I seek that the part of the submission regarding height and density of buildings in Petone be disallowed

**OPPOSE 206.273 Chapter 5E Suburban Mixed Use Activity Area Entire chapter and zoning framework**

I seek that the whole of the submission be disallowed

**OPPOSE 206.295 Chapter 11 – Subdivision Policies of section 11.1.3 Natural Hazards**

I seek that the whole of the submission be disallowed

**OPPOSE 206.308 Chapter 14H Natural Hazards Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.309 Chapter 14H Natural Hazards Flood Hazard Overlay**

I seek that the whole of the submission be disallowed.

**OPPOSE 206.310 Chapter 14H Natural Hazards Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.311 Chapter 14H Natural Hazards Flood Hazard Overlay**

I seek that the whole of the submission be disallowed

**OPPOSE 206.313 Chapter 14H Natural Hazards Introduction**

I seek that the whole of the submission be disallowed

**OPPOSE 206.314 Chapter 14H Natural Hazards Introduction**

I seek that the whole of the submission be disallowed

**OPPOSE 206.317 Chapter 14H Natural Hazards Policy 14H 1.1 Levels of Risk**

I seek that the whole of the submission be disallowed

**OPPOSE 206.318, 206.320, 206.322, 206.324, 206.326, Chapter 14H Natural Hazards Policy 14H 1.3, 1.4, 1.5, 1.6, 1.7**

I seek that the whole of these submissions be disallowed

**OPPOSE 206.319, 206.321, 206.323, 206.325, 206.327 Chapter 14H Natural Hazards Policy 14H 1.3, 1.4, 1.5, 1.6, 1.7**

I seek that the whole of these submissions be disallowed

**OPPOSE 206.328, 206.332, 206.334, 206.336 Chapter 14H Natural Hazards Rules Rule 14H 2.2, 2.3, 2.4, 2.5**

I seek that the whole of these submissions be disallowed

**OPPOSE 206.331, 206.333, 206.335, 206.337 Chapter 14H Natural Hazards Rules Rule 14H 2.2, 2.3, 2.4, 2.5**

I seek that the whole of these submissions be disallowed

**Investore Property Ltd. Submission 258**

**OPPOSE 258.4, 258.5, 258.6, 258.7 Natural Hazards – Policy 14H 1.1, 1.8**

I seek that the whole of the submission be disallowed


(Please use additional pages if you wish)

8. I  wish  do not wish to be heard in support of my submission  
(Please tick one)

9. If others make a similar submission,

I  will  will not consider presenting a joint case with them at the hearing.  
(Please tick one)

Signature of submitter  
(or person authorised to sign  
on behalf of submitter)

	Date 24/11/2022
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A signature is not required if you make your submission by electronic means

### Privacy Statement

The information you provide in this submission, including your name and contact details, will be provided to other submitters and published on Hutt City Council's website. Hutt City Council is required to collect and publish this information under the Resource Management Act 1991. Your contact details will be removed from Council's website when the further submissions process has been completed, however your name will still appear in the hearing and decision reports.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [informationmanagementteam@huttcity.govt.nz](mailto:informationmanagementteam@huttcity.govt.nz) or call 04-570-6666.

### Where to send your submission

- By email (preferred): [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)
- By post: Hutt City Council, Private Bag 31912, Lower Hutt 5040
- In person: At the Hutt City Council Customer Service Centre, 30 Laings Road, Lower Hutt