APPENDIX A: Summary of Feedback Received from Consultation

Consultee	Summary of feedback	Response
Minister for the Environment	No written comments provided.	UHCC staff have had regular meetings with MfE and HUD staff over the last few months and the government staff have advised verbally they are broadly comfortable with the UHCC IPI proposal generally.
Department of Conservation	No feedback received.	N/A
Kāinga Ora — Homes and Communities	Kāinga Ora generally supports the intent of the Draft IPI in response to giving effect to the NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Kāinga Ora is seeking for a level of consistency in plan-making within the region while remaining cognisant of the timeframe in which Council must notify its IPI. Walkable catchments Kāinga Ora are generally supportive of the walkable catchments proposed by the Draft IPI, but do consider that additional high density can be realised following walkable catchments commensurate of each centre hierarchy. Suggest higher densities within specific distances from centres such as 800m — 2km walkable catchment from the City Centre Zone. Kāinga Ora supports the Council enabling residential intensification with a commensurate increase in urban built form in accordance with the NPS-UD and the Enabling Housing Supply Amendment Act. This is especially evident within the City Centre zone with no maximum height limits which is in keeping with Policy 3(a) of the NPS-UD.	Walkable catchments The Council has identified walkable catchments around centres and rapid transit stops based on real-world walkability times based on an approximate 10 minute walkable distance. The Council is satisfied the identification of these walkable catchments is appropriate. It is noted the suggested walkable distance of 2km around the City Centre Zone would extend beyond the residential zones of the City, into rural areas. On this basis the scale of walkable catchments suggested by Kāinga Ora do not fit with the scale and geography of Upper Hutt City. Amendment of General Residential Zone provisions and proposed new High Density Residential Zone provisions. The general support for these provisions is acknowledged. The Council is satisfied the extent of walkable catchments and corresponding extent of the High Density Residential Zone is an appropriate local response to the requirements of NPS-UD Policy 3. Based on walkability and the scale of the City Centre Zone in Upper Hutt, the Council does not consider there to be a justification to increase the spatial extent of the zone. Policy 3 is given effect to via the proposed extent of the HRZ and its associated provisions. The Council is satisfied with the permitted activity standards that differentiate the HRZ from the GRZ. It is not considered appropriate to: • provide for an unlimited number of
	Zone Kāinga Ora notes that in giving effect to the above national direction in the residential context the, Council proposes to amend the General Residential Zone ("GRZ") to become a widespread medium density zone.	residential units as a permitted activity; delete the height in relation to boundary standard; or reduce the private open space requirements.

Kāinga Ora generally supports this approach, noting that the GRZ provides an appropriate zoning framework to enable greater levels of intensification as directed by the Enabling Housing Supply Amendment Act.

High Density Residential Zone

Kāinga Ora also generally supports the introduction of a High Density Residential Zone ("HRZ") where the Council seeks to enable building heights of at least 6 storeys in residential environments, such as within a walkable catchment of the city centre and/or train stations, but consider the spatial extent of the HRZ should be extended in some areas based on their own methodology.

Seeks that the objectives and policies of the HRZ are amended to provide for greater differentiation from the GRZ to better reflect the intended outcomes of the HRZ

Seek that reduction in private opens space areas, and the deletion of height in relation to boundary standards (or more enabling standards) should be put in place to better assist with achieving the heights intended for the zone

Reverse sensitivity

Kainga Ora opposes the use of reverse sensitivity effects being a matter of discretion in the HRZ, noting high density residential development is the anticipated outcome of the zone.

Subdivision provisions

Kāinga Ora recommends that vacant lot subdivision provisions should be amended so that lot sizes of 1200m² are provided for as a permitted activity, while anything smaller is considered as a non-complying activity. Consider that minimum lot sizes for vacant allotments will discourage higher density developments.

Papakāinga provisions

Kāinga Ora generally supports the new Papakāinga chapter within the IPI and supports the simplification of provisions to enable Papakāinga, in its

It is intended that proposed breaches to these standards will trigger the requirement for resource consent and the consideration of the principles and outcomes identified in the proposed design guide. This will ensure the Council gives effect to Policies 3 and 4 of the MDRS and Policy 1 of the NPS-UD. Without these limitations and requirements to ensure design outcomes are considered, it is unclear how Kāinga Ora consider the Council could effectively:

- encourage development to achieve attractive and safe streets and public open spaces, including by providing passive surveillance;
- enable housing to be designed to meet the day to day needs of residents; and
- ensure planning decisions contribute to well-functioning urban environments.

The Council has applied the MDRS to all relevant residential zones as required by the RMA, and has given effect to the heights and densities of urban form in the required areas in accordance with Policy 3 of the NPS-UD. In addition to these requirements, more generous heights, height in relation to boundary, site coverage, and number of residential units per site are proposed as permitted activities for the HRZ to encourage greater density housing in the most appropriate parts of the City. It is noted Clause 3.4(2) the NPS-UD clarifies that 'plan enabled' development capacity means land that is zoned for housing or business use if those uses are permitted, controlled, or restricted discretionary activities. There is no legal requirement for the height and density requirements of Policy 3 of the NPS-UD to be provided for as permitted activities. Notwithstanding this, the proposed trigger for the consideration of the design guide is higher than the GRZ, despite the increased potential for poor planning and design outcomes resulting from greater heights and densities as a permitted activity. On this basis, the Council is satisfied with this general approach as drafted.

Reverse sensitivity

The Council notes high density residential development is only one form of development provided for in the zone. Lower density residential development will continue

most holistic sense, however the following amendments are suggested:

Promote Council's general role as an active facilitator of papakāinga developments, recognising Te Tiriti o Waitangi responsibilities and historical breaches as well as the holistic benefits for whanau/hapu/iwi and the wider community.

Adopt an approach to papakāinga housing densities based on the 'carrying capacity of the land' as opposed to arbitrary lot sizes or density requirements. Such an approach would involve the Council assisting in determining such carrying capacities, particularly with regard to three waters capacity.

Incorporate the need for communal buildings as an integral part of the papakāinga on a permitted or restricted discretionary basis.

Include provisions for mixed-use development, including but not limited to marae, residential activities, cultural activities, business, and light industries.

Allow for papakāinga on general title land (Rule PK-R2) as a permitted activity also. There is no reason that there should be a differentiation between this rule and PK-R1.

Include Te Ātiawa as a member under PK-R2(a).

Kāinga Ora don't agree with the notes under PK-R2, specifically:

- a) "Any other matter related to tikanga Maori'. This is a very broad category; and
- b) In terms of seeking advice from 'iwi authorities' - landowners and iwi authorities aren't necessarily the same people. Iwi authorities and runanga don't often have large land holdings as this is held more at a whanau level. Kāinga Ora consider that there is potential for too much iwi

to be provided for, as will non-residential activities via the resource consent process. The Council notes when considering the adverse effects on the environment for the purposes of identifying affected persons under Section 95E of the RMA, the anticipated outcomes for the zone are only relevant if the District Plan provides for that outcome as a permitted activity. In addition, as the zone includes or adjoins lawfully established nonresidential activities it is appropriate to consider potential reverse sensitivity effects on those activities that may result from increased residential densities the IPI proposes. On this basis the Council is satisfied the retention of reverse sensitivity effects as a matter of discretion is appropriate and represents good resource management practice.

Subdivision provisions

The Council considers that in circumstances where it has not been demonstrated at the time of subdivision that a residential unit that complies with the MDRS can be provided for on an allotment, it is appropriate to require minimum allotment sizes.

The intent of the High Density Residential Zone is to encourage high density residential subdivision and development rather than the creation of large vacant allotments. It is noted the suggestion by Kāinga Ora to increase the minimum allotment size to 1200m² and that any allotments less than this be provided for as a non-complying activity would further encourage and provide for the creation of larger vacant allotments, rather encourage comprehensively designed high density developments.

The Council notes the approach used in the IPI is consistent with Schedule 3A Clause 8 – Further rules about subdivision. The Council also considers the approach taken in the IPI with respect to vacant allotments will discourage the creation of large vacant allotments for low density housing.

Papakāinga provisions

As a general note to Kāinga Ora's suggested amendments, the Council notes the provisions have been drafted by Te Rūnanga O Toa Rangatira, with only minor amendments made by the Council when incorporating them into the IPI. The Council is reluctant to make changes to the provisions in

authority involvement in Māori landowner decisions.

Further, Kāinga Ora considers that papakāinga should be a permitted activity under the following circumstances also:

- (i) Whenua Maori under Te Ture Whenua Maori Act 1993:
- (ii) Land converted to General Title land through the Maori Affairs Amendment Act 1967; and
- (iii) Treaty Settlement Land, including RFR land or land purchased by post-settlement government agencies.

Centre Zones

Kāinga Ora suggests there is no need for a provision limiting the maximum number of units per site within the Centre Zones as the construction of all buildings should be considered a Restricted Discretionary activity under the District Plan. Kāinga Ora seeks that this rule is removed across all centre zones.

Urban Design Guides

Kāinga Ora opposes any policies or rules that require development proposals to be consistent with such design guidelines in the District Plan. Kāinga Ora seeks that any design guidelines are not included as statutory documents in the IPI. These documents should be treated as non-statutory documents to inform design and development.

Definitions

Kāinga Ora opposes many of the definitions used, including the specific listing of existing qualifying matters on the grounds they are unnecessary or do not align with the national planning standards.

response to a government agency requesting them in isolation.

Specific responses to the suggested amendments are:

It is not the role of a district plan, or the papakāinga provisions to specify that it is the Council's general role to be an active facilitator of papakāinga developments, nor to recognise Te Tiriti o Waitangi responsibilities and historical breaches. As a regulatory document that manages the resource management issues within the City, the Council considers attempting to specify the Council's role in the provision of papakāinga (other than as the regulatory authority) within the District Plan would be inappropriate, particularly with respect to the alternative methods available to achieve these aims that sit outside of a district plan.

In terms of the need for communal buildings, it is noted the papakāinga provisions do not preclude this as a permitted activity. On this basis it is not clear what changes Kāinga Ora are seeking.

With respect to providing for mixed-use development including marae, residential activities, cultural activities, and business it is noted the IPI provisions already provide for these. Therefore, it is not clear what changes Kāinga Ora are seeking.

With respect to providing for papakāinga on general land and seeking advice from iwi authorities to confirm applicants qualify under the proposed rules, the Council considers there justified practical reasons to not provide for these matters as a permitted activity.

The Papakāinga provisions are much more enabling than those provided for typical residential use and development. The justification for this greater enablement for Māori compared to non-Māori stems from the requirements of Section 8 and 6(e) of the RMA, which require the Council to take into account the principles of the Treaty of Waitangi, and to provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga as a Matter of National Importance.

The Council therefore requires an effective implementation method to distinguish between Māori and non-Māori to enable the papakāinga provisions to be practicably applied. In the absence of this method (i.e. the proposed resource consent process and advice from iwi authorities), the papakāinga provisions cannot be effectively implemented. Kāinga Ora do not appear to have proposed an effective alternative method to address these practical implementation challenges.

With respect to the land tenures that the papakāinga provisions can be applied as a permitted activity, it is noted the provisions already specifically provide for Māori land under Te Ture Whenua Māori Act 1993. The other types of land identified by Kāinga Ora are also provided for via the restricted discretionary activity consent to ensure the relevant objectives and policies (and relevant provisions of the RMA) will be met when the provisions are implemented.

The feedback requests Te Ātiawa is added to the papakāinga provisions. The Council notes Te Ātiawa are already included on the basis that Taranaki whānui is part of Te Ātiawa.

Centres Zones

The Council notes only buildings in the City Centre Zone require a resource consent, and there are no limits on the number of residential units within the City Centre Zone.

Urban Design Guides

It is unclear how Kāinga Ora consider design guides would function as an effective method to achieve attractive and safe streets, passive surveillance, and enabling housing to be designed to meet the day-to-day needs to residents as non-statutory documents. The Council considers the most effective, efficient and appropriate method to achieve the objectives of the NPS-UD and Schedule 3A of the RMA is via the use of design guides within rules. The Council is not aware of any convincing evidence that demonstrates that non-statutory guidance documents are an effective method to achieve important urban design outcomes.

Definitions

The Council is satisfied the defined terms proposed by the IPI will assist in plan

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		implementation and are not unnecessary or contrary to the National Planning Standards.
		It is noted the defined terms used in the National Planning Standards are not allencompassing exhaustive list of activities. There are many activities (and their associated actual and potential effects) that do not fit with the definitions used in the National Planning Standards. Many activities involve a mixture of activities that are captured by more than one National Planning Standard definition. On this basis, the request to align some of the very specific defined terms used in the IPI with those defined by the National Planning Standards is not a useful request. It is noted the use of defined terms that do not have the same or equivalent meaning as the defined terms of the National Planning Standards, or those that have a narrower application, can lawfully be used in accordance with Clause 14 (1)(a) and (b) of the National Planning Standards.
		In addition, the proposed defined term for qualifying matter area is an effective and practical method to clearly identify the existing qualifying matter provisions that will continue to apply where the MDRS and NPS-UD intensification provisions would otherwise apply unrestricted. It is not clear how Kāinga Ora consider existing qualifying matter provisions would continue to function clearly during plan implementation without them being specifically identified in the District Plan in the way proposed. No reasonably practicable alternative method is proposed by Kāinga Ora. In the absence of an alternative technical solution to this issue, the Council is satisfied the IPI proposed approach to the identifying of existing qualifying matters is appropriate.
Minster for Housing and Urban Development	No written comments provided.	UHCC staff have had regular meetings with MfE and HUD staff over the last few months and the government staff have advised verbally they are broadly comfortable with the UHCC IPI proposal generally.
Waaka Kotahi New Zealand Transport Agency	No feedback received.	
Hutt City Council	No feedback received.	N/A
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Kapiti Coast District Council	No feedback received.	N/A
Porirua City	No feedback received.	N/A
Council	INO IEEUDACK IECEIVEU.	IN/A
Council		

South Wairarapa District Council	No feedback received.	N/A
	The feedback outlines the four significant and urgent resource management issues GWRC intend to address via a change to the Regional Policy Statement, comprising: The impacts of climate change Loss and degradation of indigenous biodiversity Degradation of water quality Land of urban development capacity. The feedback also outlines GWRC's intended actions for district plans to give effect to via the future RPS change, including: tree canopy requirements to improve climate resilience, requiring that urban development occurs using the principles of Water Sensitive Urban Design, encouraging the transition to low/zero carbon transport through mode shift, including enabling establishment of infrastructure to allow faster uptake of low-carbon emissions transport, requiring financial contributions where off-site stormwater treatment is necessary to offset adverse effects of development	As a general response to the mar GWRC in their feedback, it is not an opportunity for the Cour possible shortfalls in the existin provisions with respect to giving RPS. The matters that can be in IPI are specified in section 80E and section 80G(1)(b) makes to very clear. Therefore, matters feedback from GWRC that addressed via the IPI include: • All matters referred to recontent and potential direct draft changes to the RPS changes have no legal state RMA; • Any specific provisions to impacts of climate changes that fall under sect RMA (such as hydraulic requalifying matters); • Degradation of water quality responsibilities and power water quality and discharged under section 30 rather the of the RMA); • Specifically including provisions to the RMA); • Specifically including provisions to the RMA (such as hydraulic respond to the NPS-FM and Wai beyond the recommen WIP and Te Mahere Wai hydraulic neutrality provision under the IPI limitations
	 and promote positive effects, risk-based approaches for natural hazard consequences, including allowances for climate change 	section 80E(2)(f) of the RM/ Responses to GWRC's IPI-speci are provided below:
	 over the next 100 years, ensuring environmental integration in urban development, and joint consenting procedures. 	Te Mana o te Wai and integrate management The IPI proposes to include
	The feedback also notes Upper Hutt City Council is a member of the Whaitua te Whanganui-a-Tara Committee and supported the Whaitua te Whanganui-a-Tara Implementation	neutrality provisions that will subdivision and development zones specifically addressed u These provisions do not includ- directly address stormwater qu impacts on the health and freshwater bodies because:

Programme (WIP), and therefore the IPI should have regard to the outcomes

of the whaitua process. GWRC notes

atters raised by noted the IPI is ncil to address ng district plan ng effect to the ncluded in the E of the RMA, this limitation raised in the t cannot be

- regarding the rection of any - noting draft atus under the
- o address the ange beyond tion 80E of the neutrality and
- lity (noting the ers managing es to water fall han section 31
- rovisions that d Te Mana o Te ndations of the that relate to ions (which fit s specified by 1A.

ific comments

ted freshwater

ude hydraulic ll apply to all nt within the under the IPI. de methods to uality and the wellbeing of

These matters fall beyond the limitations of sections 80E and 80G future changes to the RPS, the PNRP and the UHCC District Plan will be required to achieve this.

With respect to the IPI, GWRC have requested/state:

- that consideration of Te Mana o te Wai and integrated freshwater management through the inclusion of provisions that would address stormwater quality and the impacts on the health and wellbeing of freshwater bodies.
- that their feedback on draft plan change 50 be considered in the development of the IPI.
- that amendments to the Special Activity Zone provisions are made so that potential future subdivision considers amenity effects on Kaitoke Regional Park.
- 4. Disappointed SNAs are not protected via the IPI.
- 5. That the Indigenous Biodiversity Precinct provisions are amended so the direction provided is on considering adverse effects on indigenous biodiversity within the Precinct to more fully reflect the direction of RPS Policy 47 by including the matters of particular regard.
- Concerned that notifying the IPI without updating the natural hazards chapter may result in inappropriate development in atrisk areas, and seek re-assurance that the qualifying matters will adequately manage development in inappropriate areas.
- Note the current draft IPI objectives do not appear to explicitly seek to deliver urban

- of the RMA on what can lawfully be included in the IPI; and
- Health and wellbeing of freshwater bodies due to discharges fall under section 30 of the RMA. UHCC has no statutory powers, functions or duties to specifically address water quality issues resulting from discharges to water via the district plan.

GWRC feedback on draft plan change 50

Draft Plan Change 50 was prepared under different legislative requirements with fewer restrictions on what the draft plan change could contain. Much of draft plan change 50 has been discontinued or significantly altered due to the introduction of the MDRS and the IPI limitations imposed by the Amendment Act. Therefore, feedback on draft plan change 50 is considered to be of limited relevance to the IPI.

Amendments to the Special Activity Zone to address potential amenity effects on Kaitoke Regional Park

The IPI cannot make amendments of this type to Special Activity Zone provisions. The Special Activity Zone is not a *relevant residential zone* for the purposes of the IPI under the Act.

Lack of protection of SNAs via the IPI, and recognition of RPS policy 47

All existing SNA protection provisions will continue to apply as existing qualifying matters. Any additional future SNAs identified by the Council to be included via a future plan change are identified via the proposed Indigenous Biodiversity Precinct. The Council intends to introduce district plan provisions to protect these newly identified SNAs via a specific plan change that gives effect to the anticipated National Policy Statement on Indigenous Biodiversity, and all relevant RPS provisions.

Concerns regarding notifying the IPI without updating the natural hazards chapter

The notification of the IPI must occur by 20 August 2022. Existing qualifying matters provisions, including natural hazard provisions will continue to apply to subdivision, use and development within hazard-prone areas. The Council is in the process of updating the hazard provisions of

environments that support reductions in greenhouse gas emissions, or that provide resilience for communities from the current and future effects of climate change.

- Suggest alignment of the Design Guides with the design elements of the Wellington Regional Growth Framework.
- 9. Suggest the inclusion of Water Sensitive Urban Design in the principles in both the Medium and High Density Design Guide and the City Centre Design Guide.

the District Plan via Plan Change 47. Hazards addressed under this plan change comprise:

- The Wellington Fault;
- Mangaroa Peatlands;
- High Slope Hazard.

It is anticipated the Council will address updates to other natural hazards provisions as information becomes available and as this work can be resourced via future changes to the District Plan.

In addition, it is noted decisions on subdivision consent applications under section 106 of the RMA, and decisions on whether to grant a building consent on hazard—prone land under sections 71 and 72 of the Building Act 2004 are not limited to the consideration of natural hazard information contained in a district plan.

The IPI objectives do not appear to explicitly seek to deliver urban environments that support reductions in greenhouse gas emissions, or provide resilience from the effects of climate change

The content of the IPI is limited to the matters that fall under sections 80E and 80G of the RMA. Explicit provisions that address greenhouse gas emissions or providing resilience from the effects of climate do not fall under these sections of the RMA.

Suggest alignment of the Design Guides with the design elements of the Wellington Regional Growth Framework (WRGF)

As discussed in this section 32 evaluation report, the WRGF has no statutory weight under the RMA and has accordingly been given little weight in the preparation of the IPI.

Suggest the inclusion of Water Sensitive Urban Design in the principles in the Medium and High Density Design Guide and the City Centre Design Guide.

The IPI proposes the introduction of hydraulic neutrality provisions that will apply to medium and high density residential subdivision and development, and development within the City Centre Zone.

The Wellington Tenths Trust & Palmerston North See section above.

See section above.

Māori Reserve		
Trust		
Ōrongomai Marae	See section above.	
Te Rūnanganui o Te Ātiawa ki Te Upoko o te Ika a Māui	See section above.	
Te Rūnanga o Toa Rangatira Inc (Ngāti Toa)	See section above.	See section above.
Port Nicholson Block Settlement Trust (Taranaki Whānui ki Te Upoko o Te Ika)	See section above.	See section above.
Transpower	Support the inclusion of the national grid and associated provisions as an existing qualifying matter that give effect to the NPS-ET. Support the inclusion of the proposed definition for qualifying matter area, in particular clauses (n) and (o). Support the specific reference to qualifying matters in UDF-P2, including the avoidance direction for inappropriate development as specified by the relevant qualifying matters provisions. Would support specific policy direction be included in the IPI in relation to qualifying matters to improve plan interpretation and application to reconcile the strong 'enabling' policy directive provided under the Amendment Act. Suggest an additional national grid policy be added as follows: Avoid inappropriate development within qualifying matter areas. Suggest adding notes into relevant rules to point plan users to the location of national gird-specific rules.	Transpower's support for the proposed approach to identifying and maintaining existing qualifying matters is acknowledged. It is not considered necessary to provide a specific policy for the avoidance of inappropriate activities within qualifying matter areas, as the relevant existing District Plan provisions already achieve this. References to qualifying matter areas within policies at rule tables within relevant chapters, noting this is a new defined term, will point plan users to the relevant chapters. This likelihood is increased by the existence of district plan mapping that identifies the qualifying matters such as the national grid. For the same reasons given above, the insertion of notes to point plan users to the relevant national grid provisions is not considered necessary. Such an approach would need to capture all existing qualifying matters, making such an advice note unwieldly.
Retirement Village Association	Seek a comprehensive suite of provisions be included in the IPI to specifically provide for retirement village developments.	Provisions for retirement villages do not fit under the limitations of what an IPI can include. However, the provisions will be taken forward for consideration for potential inclusion in a future plan change that gives effect to other components of the NPS-UD.
EQC	Issue 1 The planned High Density Residential Zone on the currently undeveloped St Patrick's Estate Precinct is almost entirely contained within the 1 in 100 year flooding hazard zone for the Hutt River, as presented in the UHCC's	Issue 1 The part of the St Patrick's Estate Area that is proposed for rezoning is in the process of being filled (cleanfill) to make the site flood-free to enable future residential subdivision and development under resource consent reference numbers 2010104 and 2010104LU.

natural hazard risk maps in the District planning maps.

Identify "high hazard" and "low hazard" areas in the Flood Hazard Extent of the Hutt River, to avoid contravening District Plan NH-P3 - Avoid development within high hazard areas of identified Flood Hazard Extents and Erosion Hazard Areas.

If the planned St Patrick's Estate High Density Residential Zone is in an area identified as high risk, and flooding is expected to result in channel flow and erosion through this area, then subdivision and development should be avoided.

EQC recommends that a hazard extent map layer is added to the IPI planning maps.

Issue 2

The planned General Residential Zone northwest of and across the Hutt River from Emerald Hill, is partially contained within the 1 in 100 year flooding hazard zone for the Hutt River, as presented in the UHCC's natural hazard risk maps.

EQC recommends the same approach is taken under Issue 1 above, plus:

- Extend the restricted discretionary activity rule to cover all proposed development areas, within the Hutt River Flood Hazard Extent.
- Specify what buildings and structures within these Flood Hazard Extents, must incorporate to minimise this risk, or how the UHCC plans to lower flooding risk.

Issue 3

A Special Activity Zone is planned for the Trentham area, which is at risk of liquefaction in an earthquake event. Risk of liquefaction in Upper Hutt in the event of an earthquake, is not specified or provided for in the Draft IPI. The cleanfill is to raise the site above the 440 year flood return period. The works are authorised over an area of approximately 17.4 hectares, involving approximately 550,000m³ of fill to raise the land by an average of 3.1 metres. To offset the effects of this filling on the flood hazard the consent also requires the creation of a flood conveyance zone. Works are proposed over a 10 year timeframe.

Any areas within the site that are proposed for rezoning but are not covered by the resource consents referred to above (such as the College Area) would need to address the flood hazard via the resource consent process before residential subdivision and development could occur.

The works to the site are also authorised via consents issued by Greater Wellington Regional Council under consent reference number WGN200282.

Issue 2

The area identified and discussed is within an existing General Residential Zone. The IPI proposes to retain all existing natural hazard provisions and associated mapping as existing qualifying matters that must be complied with.

Issue 3

The concerns are noted however the IPI does not propose any special activity zones. The Special Activity Zone referred to is an existing zone within the District Plan that falls beyond the scope of the IPI.

It is noted the risks associated with liquefaction remain a natural hazard risk for the consideration of subdivision consents under Section 106 of the RMA, however for new buildings, liquefaction risk is now addressed via the Building Act and its associated regulations. Changes to the Building Code took effect from November 2021. These changes revised B1/AS1 requirements to ensure new buildings are built safe and strong enough to withstand liquefaction effects¹. On this basis it is considered the most efficient and efficient method to address liquefaction risk for new buildings is via the Building Code. However,

¹ https://www.building.govt.nz/building-code-compliance/geotechnical-education/ensuring-new-buildings-can-withstand-liquefaction-risks/

It is recommended the council review	for the subdivision of land it remains a
the MBIE liquefaction guidance,	consideration under Section 106 of the RMA.
particularly section 6.5, for options on	
how liquefaction can be incorporated	
into the IPI.	

EQC supports also the recommendation in the Coffey (2020) report, that further geotechnical investigation is carried out in this area, to accurately assess liquefaction risk.