



Te Kaunihera o
Te Awa Kairangi ki Uta
Upper Hutt City Council

PROPOSED PLAN CHANGE 47

Natural Hazards

SUMMARY OF SUBMISSIONS

FEBRUARY 2023



Guide to Submission Summary

The following format is used to summarise submissions received on Proposed Plan Change 47 – Natural Hazards:

Submission Point	Provision	Support/Oppose/Seek amendment	Decision Sought	Reasons
Submitter xx				
S1.1				

These submissions are ordered by submitter number. Each decision requested by a submitter is individually listed (SX.X)

The accompanying volume “Submissions on Proposed Plan Change 47 – Natural Hazards” contains full copies of the submissions received on Proposed Plan Change 47 – Natural Hazards. Where the submitter proposes an amendment to the proposed new or existing text or provision, the amendment proposed by the submitter is shown single underlined. Where the submitter proposes the deletion of proposed new or existing text, this is shown ~~single strikethrough~~.

Making a Further Submission

Clause 8 of the First Schedule of the Resource Management Act outlines the persons that may make a further submission, being:

- (a) any person representing a relevant aspect of the public interest; and,
- (b) any person that has an interest in the proposed plan greater than the interest that the general public has; and
- (c) the local authority itself.

A further submission must be in support of or in opposition to the submissions that have already been made and which are summarised in this document.

Further submissions should be made in writing, in general accordance with Form 6 of the Resource Management Act (Forms, Fees, and Procedure) Regulations 2003. Copies of Form 6 are available from:

- HAPAI Building, 879- 881 Fergusson Drive, Upper Hutt
- Upper Hutt Library, 844 Fergusson Drive, Upper Hutt
- Pinehaven Branch Library, corner of Pinehaven Road and Jocelyn Crescent, Pinehaven, Upper Hutt
- On the Plan Change webpage at letskorero.upperhuttcity.com/pc47

Further submissions may be lodged in the following ways:

Online	letskorero.upperhuttcity.com/pc47	Email	planning@uhcc.govt.nz
In Person	HAPAI Building 879- 881 Fergusson Drive Upper Hutt	Post	Plan Change 47 – Natural Hazards Upper Hutt City Council Private Bag 907 Upper Hutt 5140

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 1: Sonia and Steve Morgan				
S1.1	High Slope Hazard Overlay	Oppose / Seek amendment	Reconsider the zoning of the high slope risk areas and exclude 172 Plateau Road, (not only part of our home, as is currently proposed).	Classification of part of the home and property as high slope (medium risk) is inaccurate and whole house and flat section should be excluded.
Submitter 2: Ronald Hunter				
S2.1	High Slope Hazard Overlay	Oppose / Seek amendment	Please remove high slope hazard as natural hazard.	Property is not affected by high slope hazard.
Submitter 3: Amit Kakroo				
S3.1	High Slope Hazard Overlay	Oppose / Seek amendment	Consider recent subdivision in Crest Road and re-evaluate the high slope hazard.	Slope hazard assessment does not take into account the existing dwellings on Crest Road built since 2020. Similar properties have been classified differently.
Submitter 4: Cheryl Gall				
S4.1	High Slope Hazard Overlay	Support	Enact the provisions as they have been recommended.	Support for specific provisions for the high slope hazard areas.
Submitter 5: V and J Manley				
S5.1	High Slope Hazard Overlay	Oppose / Seek amendment	That you reconsider classifying our section as a high slope hazard and check it out in person properly first.	Don't agree with slope hazard overlay on the property and seek site visit be undertaken.
Submitter 6: Gaylene Ward				
S6.1	High Slope Hazard Overlay	Oppose / Seek amendment	Can this be reassessed please as I don't believe the house area is high slope.	House and garage are on the flat.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 7: Charisa Lockley				
S7.1	High Slope Hazard Overlay	Seek amendment	I request the Geotechnical Engineers visit our property for a closer look and correctly categorise the contours and high slope areas of our property.	A lot of the proposed high slope area on the property is flat land.
Submitter 8: Stephen Taylor				
S8.1	High Slope Hazard Overlay	Oppose / Seek amendment	Removal of my property from the overlay.	Property has been identified as at risk but has had no historical slips recorded. Classification could affect insurance costs and saleability. While climate change is acknowledged there is no evidence for the inclusion.
Submitter 9: David John Angus				
S9.1	High Slope Hazard Overlay	Seek amendment	I would like to request that an amendment be made to the high slope hazard overlay, removing my property from this zone. I understand that a site inspection can be carried out by a Geotechnical Engineer, I would welcome such an inspection.	Inclusion of part of the section in High Slope Hazard zone seems overly cautious. Included portion isn't any steeper than remainder of the site.
Submitter 10: Paul Atkins				
S10.1	High Slope Hazard Overlay Mapping of Slopes	Oppose / Seek amendment	I wish the plan and maps to be redrawn using accurate measurement and onsite geotechnical resource, not an aerial survey.	Current slope map covers half of the existing dwelling and does not take into account flat areas surrounding the house.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 11: Steven Fargher				
S11.1	High Slope Hazard Overlay	Support / Seek amendment	I would like the high slope areas to be reviewed in order to accurately and consistently apply them across the UHCC area. An example is that no high slope has been applied to the significant slope behind 18 - 28 Sunbrae Drive. The slope and ground material are the same as or worse than what has been identified as a high slope area between Deller Grove and Pinehaven Road and Sunbrae Drive.	High slope areas should be applied consistently or not at all.
Submitter 12: Alec Hobson				
S12.1	High Slope Hazard Overlay	Oppose / Seek amendment	<p>I oppose the way the current PC47 -Natural Hazard Map reflects the “High Slope Hazard” for 29 Aragon Grove, Kingsley Heights, Upper Hutt. I request that the “red” area and line indicating the “High Slope Hazard”, be rectified, and moved, to be behind the property at 29 Aragon Grove, where the slope does in fact start (map attached in submission).</p> <p>If this can be rectified, I do not wish to be heard in support of my submission. If the council does not make the correction I would want to be heard, as the current indication is clearly incorrect.</p>	PC47 incorrectly identifies steep slope on the site. Section is flat and house is built on even and level area. Slope is located behind the property. Same is true for neighbouring properties.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 13: Jo Greenman				
S13.1	High Slope Hazard Overlay	Seek amendment	Please move the boundary to the west of the property like the rest of the neighbouring properties e.g., 62 and 60 Mt Marua Drive.	House and shed are located on flat land and slope hazard boundary line should be moved.
Submitter 14: Camilla Jane Watson				
S14.1	High Slope Hazard Overlay	Support / Seek amendment	We seek the boundary of the High Slope Hazard be moved. There is a large flattish grassed area that has been inadvertently included in the Hazard area (map included in submission). This will be because the radiata pine was included as 'bush'. The Hazard boundary should be moved.	While generally supporting the specific provisions, the boundary on the property should be amended. High slope hazard area has been incorrectly determined due to a large tree obscuring the satellite view. The grassed area is the same level as that next to it and should not be included in the red Hazard Area. (Map included in submission)
Submitter 15: David Chrystall				
S15.1	High Slope Hazard Overlay	Oppose / Seek amendment	Remove flat areas from your map that you have incorrectly labelled.	Map incorrectly identifies flat paddocks as a 'high slope hazard'.
Submitter 16: Eric Cairns				
S16.1	High Slope Hazard Overlay Use of 26 degrees as threshold	Oppose / Seek amendment	I would appreciate a site visit to discuss the location of the high slope hazard overlay, to exclude the footprint of the existing house.	Erosion susceptibility is dependent on rock and soil types, ground water saturation/water table, fracture plane, slope, vegetation cover and other factors. The NES-PF erosion susceptibility classification treats Mangaroa Valley foothills as low risk of significant landslide.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				<p>Slope threshold of 26 degrees for greywacke soils seems quite conservative and simplistic when there are other factors to be considered.</p> <p>High slope hazard boundary is drawn through the house and should be reviewed.</p>
Submitter 17: Steve Rich				
S17.1	High Slope Hazard Overlay	Seek amendment	Amend the area of 271c Wallaceville Road to reflect the high slope areas of the property more accurately, by removing the current red zoned areas cutting across the house, and behind and above the house; in the top north corner of the property; and in two areas on the eastern side of the property.	Identified high slope hazard areas do not accurately reflect actual slope areas on the property.
Submitter 18: Lance Burgess				
S18.1	High Slope Hazard Overlay	Oppose	<p>The council should not be imposing an arbitrary map on the residents of Upper Hutt without further specialist in person validation.</p> <p>It is of little value in its current form and will not achieve the aims it was intended for and will also cause the residents additional unnecessary costs.</p>	<p>The proposed slope hazard maps have been arbitrarily computer generated or generated from aerial photographs and not been adequately verified by specialist professionals in person.</p> <p>The defined areas of slope hazard do not meet the intended definition which undermines the validity of what the council is trying to achieve.</p> <p>The current overlay is inaccurate and does not reflect the actual topography. It could therefore result in unwanted outcomes.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 19: David Beachen				
S19.1	High Slope Hazard Overlay	Seek amendment	To reassess the property to remove the flat portion from the 'high slope hazard' area.	High slope hazard includes flat land on the property.
Submitter 20: Simon Wall				
S20.1	High Slope Hazard Overlay	Seek amendment	Amend the shading so that is excludes the flat bits of the section. Very happy if you want to visit the site to understand my issue.	Natural hazard shading covers flat part of the section including the house. Overall agreement with provisions.
Submitter 21: Judi Huxedurp				
S21.1	High Slope Hazard Overlay	Seek amendment	I seek the full disclosure to the rate payers and general public of the effects to the high slope hazard areas in the direct region of Farrah's noise non-compliance and the introduction of the proposed Silverstream Spur road, including but not limited to the earthworks required, changes of natural structure, heavy vehicle access and environmental demands on the area.	Land in the high slope area has greater impact from vibrations related to noise and traffic. Therefore, excessive industrial noise and increased traffic risk should be included in consent requirements. This includes the current Farrah bread factory non-compliance noise vibrations and access to Kiln Street from Sylvan Way with the proposed Silverstream Spur road.
Submitter 22: Rozalie Brown				
S22.1	High Slope Hazard Overlay	Seek amendment	I seek acknowledgement, disclosure and communication of past activities and all future decisions to reflect hydraulic neutrality.	Plan should include advice to residents of any future infill housing, section subdivision, activity on regional council park land prior to commencement of earthworks and other activities. Council land adjoining ratepayers' properties should have a scheduled maintenance and restoration plan with all encroachment activities clearly communicated and identified.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				Past activities of Hutt County have resulted in an enlargement of high hazard areas.
Submitter 23: Brenda Stonestreet				
S23.1	High Slope Hazard Overlay	Seek amendment	Not stated	I would like my property reassessed in particular the large area that I do not consider to be slope at the front and side of the house. (Map included in submission)
Submitter 24: Aldis Malskaitis				
S24.1	High Slope Hazard Overlay	Seek amendment	I request that the Council reconsider and remove the high slope hazard in relation to my property. I would welcome someone to visit my property to confirm that the topography of my site is not such that it would fit the criteria of a high slope hazard.	Area of the property that has been identified as high slope hazard area is completely flat and located at least 20m from nearest bank. Topography of my property would not fit the criteria of high slope hazard.
Submitter 25: Mark Murrell				
S25.1	High Slope Hazard Overlay	Seek amendment	To remove the shading/allocation of high slope from all areas of 216 Mangaroa Valley Road, Upper Hutt <ul style="list-style-type: none"> • House and car park • Shed and car park • Levelled area at the top of the track (currently overgrown) • Any other areas not at 26° or more 	Areas that are not at 26 degrees or more should be removed from the plan as they are not considered as high slope.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 26: Teresa Homan				
S26.1	PC 47 - General	Support	That development of these areas is not consented and no provision for consenting is established, or it is very limited in what can be consented. Development for housing is not reliant on these areas being developed and it is not necessary to risk the loss of heritage sites or the risk to on-going issues for homeowners.	All hazard areas identified in the plan change are unsuitable for housing and development. Support for provisions that limit development and provide ongoing protection for potential homeowners. Any development of Mangaroa Peatlands can't guarantee safety and would impact on natural heritage that should be protected.
Submitter 27: Karsten Kroeger				
S27.1	High Slope Hazard Overlay	Seek amendment	Amendment of the slope hazard assessment, requiring a new approach. The present methodology is inappropriate.	Current slope hazard assessment is insufficiently supported by data and lacks robust methodology.
S27.2	High Slope Hazard Overlay	Seek amendment	Removal of high slope hazard at 17 Avian Crescent property as it is unsupported by data.	<p>Assignment of high slope hazard to portion of the site appears to be arbitrary and unsupported by data and is not consistent with the actual conditions.</p> <p>Report that informs assessment does not address vital questions regarding methodology and related maps are confusing and lack explanation.</p> <p>If published the report may have significant impact on insurance and property values.</p> <p>Identification of slope hazard areas seems inconsistent across similar properties.</p> <p>General assumption that all slopes are soil rather than rock slopes leaves the obligation to proof otherwise to property owners.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				In conclusion, the assignment of high slope hazard across 17 Avian Crescent appears to be entirely arbitrary and unsupported by the data and should therefore be removed. (Supporting figures attached in submission)
Submitter 28: Donna Tofts				
S28.1	High Slope Hazard Overlay	Seek amendment	That the plan is amended correctly.	House and garage are mapped as being on high slope which is incorrect as they have been built on flat land.
Submitter 29: Stephen Shand				
S29.1	High Slope Hazard Overlay	Seek amendment	Further checks/drones for my slopes as the map seems over generous for my address. Note if anything will affect the installation of an in-ground 15metre swimming pool?	Further checks/drones for my slopes as the map seems over generous for my address. Note if anything will affect the installation of an in-ground 15metre swimming pool?
Submitter 30: Wayne Edgerley				
S30.1	High Slope Hazard Overlay	Seek amendment	To be excluded from the High Slope Hazard Area.	Area of the property that is identified as High Slope Hazard is flat and sloping ground is on opposite side of Tiniroa Grove. Visit to discuss would be welcome.
Submitter 31: Rosemary Anne Paddison				
S31.1	High Slope Hazard Overlay	Seek amendment	A new corrected map.	Slope area on the maps incorrectly covers half the house which is on flat land. Reassess the steep areas on my property so they show correctly.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 32: Robert Bok				
S32.1	High Slope Hazard Overlay	Seek amendment	A response/result that is correct.	<p>Not all properties with a high slope present a risk to others, therefore additional resource consent requirements result in unfair costs and lost time.</p> <p>Any consents should be at no cost/time lost for owners or only for properties where slopes present a direct risk to neighbours.</p> <p>Should the plan change go ahead all high slope risk properties should be given rates rebate.</p>
Submitter 33: Allan Kelly				
S33.1	High Slope Hazard Overlay	Seek amendment	That the PC47 survey for 100 Karapoti Road be corrected.	<p>The survey for the site contains significant errors and needs to be corrected.</p> <p>We don't want unnecessary planning issues due to an incorrect survey.</p> <p>Identified high slope hazard areas on the site are flat while a drop off to the river is not marked as such. This might cause issues for future building sites.</p> <p>(Supporting map attached in submission)</p>
Submitter 34: Karen Pugh				
S34.1	Wellington Fault Overlay High Slope Hazard Overlay NH-P1 to NH-P7	Seek amendment	Remove the natural hazard classifications i.e., uncertain constrained and high slope hazard from the land identified as 7 Turksma Lane, Kaitoke therefore removing any related natural hazard policy and rules and building restrictions on this land.	<p>The classification of the property as 'uncertain constrained' is not correct. Based on a new report the fault area has been mapped in error and should be removed.</p> <p>The High Slope Hazard overlay along rivers/streams on site is not warranted as it covers shallow banks and should be removed.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
	NH-R1 to NH-R8			
Submitter 35: WREMO – Jeremy Holmes				
S35.1	PC 47 - General	Support	Not stated	Support of the proposed District Plan change to address the updated risk from natural hazards.
Submitter 36: Daniel Buhler				
S36.1	High Slope Hazard Overlay	Seek amendment	To have the high hazard map on my property reviewed by Council in collaboration with the property owner.	The high slope hazard map is not accurate and includes flat land. Report seems to be generic without considering actual land layout.
S36.2	High Slope Hazard Overlay	Seek amendment	Review all high hazard maps to ensure they are accurate.	
Submitter 37: Doug Gillanders				
S37.1	High Slope Hazard Overlay	Seek amendment	That the area be corrected to a realistic outline actually relating to what is there regarding the small stream area. The designation of high slope hazard removed from my property.	Most of the area marked as slope hazard is flat land. Survey has been computer modelled with no reference to actual situation.
Submitter 38: Melanie Smith				
S38.1	High Slope Hazard Overlay	Seek amendment	I would like the mapping to be adjusted so it's not identifying areas of flat land including roads and current building platforms.	High slope mapping is identifying areas of flat land including roads and building platforms.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 39: Quinn McCarthy				
S39.1	High Slope Hazard Overlay	Seek amendment	I request that the "High Slope Hazard" zoning on number 70 Blue Mountains Road be reduced to run along the boundary line. The boundary line sits approximately 10 meters back from the bank edge, the risk of any building is greatly reduced and already covered under the building code.	The high slope hazard encroaches further than what is reasonable for any slope instability on the site.
Submitter 40: Dr Boyd Blake and Mrs Verna Blake				
S40.1	High Slope Hazard Overlay	Seek amendment	<p>We wish to have amendments made to alter and realign the current "High Slope" hazard map zone boundaries, so they accurately depict the true area of "High Slope" hazard for 23 Sylvan Way, 27 Sylvan Way and 29 Sylvan Way, Silverstream.</p> <p>This can be accomplished by the simple realignment of a small area of the "High Slope" hazard map boundary by excluding from the map the level terrace area which runs to the rear of 23 Sylvan Way and continues south south-east across the back of the neighbouring properties being 27 and 29 Sylvan Way.</p> <p>An on-site inspection would confirm the above inaccuracies and the need for the realignment of the hazard map zone boundaries.</p>	<p>Do not oppose Plan Change 47 as it is important to identify areas of Natural Hazards so community can plan and move forward with confidence.</p> <p>High Slope map boundaries are inaccurate and will have devastating impact on values and insurance premiums and will create unnecessary stress and worry.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>This terrace mentioned above would not be known to exist by many and was formed many decades ago by the old Kiln Street Brick and Pipe Works for extracting clay for their manufacturing of bricks and pipes.</p> <p>(High Slope hazard map with proposed map boundary changes attached in submission)</p>	
Submitter 41: Yannick M Quesnel and Sherilyn A Quesnel				
S41.1	High Slope Hazard Overlay	Seek amendment	<p>We wish to have amendments made to alter and realign the current “High Slope” hazard map zone boundaries, so they accurately depict the true area of “High Slope” hazard for 23 Sylvan Way, 27 Sylvan Way and 29 Sylvan Way, Silverstream.</p> <p>This can be accomplished by the simple realignment of a small area of the “High Slope” hazard map boundary by excluding from the map the level terrace area which runs to the rear of 23 Sylvan Way and continues south south-east across the back of the neighbouring properties being 27 and 29 Sylvan Way.</p> <p>An on-site inspection would confirm the above inaccuracies and the need for the realignment of the hazard map zone boundaries.</p>	<p>Do not oppose Plan Change 47 as it is important to identify areas of Natural Hazards so community can plan and move forward with confidence.</p> <p>High Slope map boundaries are inaccurate and will have devastating impact on values and insurance premiums and will create unnecessary stress and worry.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>This terrace mentioned above would not be known to exist by many and was formed many decades ago by the old Kiln Street Brick and Pipe Works for extracting clay for their manufacturing of bricks and pipes.</p> <p>(High Slope hazard map with proposed map boundary changes attached in submission)</p>	
Submitter 42: Dr Amarjeet Kanwal & Mrs Ripudaman Kanwal				
S42.1	High Slope Hazard Overlay	Seek amendment	<p>We wish to have amendments made to alter and realign the current “High Slope” hazard map zone boundaries, so they accurately depict the true area of “High Slope” hazard for 23 Sylvan Way, 27 Sylvan Way and 29 Sylvan Way, Silverstream.</p> <p>This can be accomplished by the simple realignment of a small area of the “High Slope” hazard map boundary by excluding from the map the level terrace area which runs to the rear of 23 Sylvan Way and continues south south-east across the back of the neighbouring properties being 27 and 29 Sylvan Way.</p> <p>An on-site inspection would confirm the above inaccuracies and the need for the realignment of the hazard map zone boundaries.</p>	<p>Do not oppose Plan Change 47 as it is important to identify areas of Natural Hazards so community can plan and move forward with confidence.</p> <p>High Slope map boundaries are inaccurate and will have devastating impact on values and insurance premiums and will create unnecessary stress and worry.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>This terrace mentioned above would not be known to exist by many and was formed many decades ago by the old Kiln Street Brick and Pipe Works for extracting clay for their manufacturing of bricks and pipes.</p> <p>(High Slope hazard map with proposed map boundary changes attached in submission)</p>	
Submitter 43: Robert Anker				
S43.1	Mangaroa Peat Overlay Mapping	Seek Amendment	<p>Prior to incorporating any peat overlay in UHCC documentation the area should be comprehensively surveyed to establish the extent, depth, and underlying ground conditions.</p>	<p>Peat overlay mapping is a desk top exercise with little ground truthing.</p> <p>Maps may be used by other organisations to advance their own agenda.</p> <p>Peat is not in itself a natural hazard; low load bearing capacity applies to other soil types as well.</p> <p>Depth of peat or nature of ground underlying the top cover have not been established sufficiently.</p>
S43.2	Mangaroa Peat Overlay Coffey Report	Seek amendment	<p>Clarify that the Coffey report does not cover the Mangaroa Peatlands. The observations concerning the nature of the soil and referring to it as a hazard is not supported by any accompanying scientific or technical evidence and I would question as to whether the author of the CBA is qualified to make statements of this nature.</p>	<p>Coffey report does not incorporate Mangaroa Peatlands and makes inaccurate statements and conclusions.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Further comments and observations regarding the veracity of the CBA are included in the submission.	
S43.3	Mangaroa Peat Overlay	Seek amendment	Remove all references that refer to peat as constituting a natural hazard.	<p>Peat is just another soil type, not a natural hazard.</p> <p>Any dwelling requires an engineered foundation under the Building Act.</p> <p>Main concern seems to be the shrinking of peat, which will not happen in isolation but across properties. PC47 does not identify expected rate of shrinkage or relation to depth of peat.</p> <p>S32 states that peat soils are soft and wet which may impact the structural integrity of buildings. However, core sampling shows dry conditions, and any building foundation will take ground and load bearing conditions into consideration.</p>
S43.4	Mangaroa Peat Overlay	Seek amendment	Council recognise that all financially based markets are driven by confidence and that Council has a direct responsibility to the community at large to avoid inflammatory remarks and observations that have the potential to disrupt financial stability.	<p>Incorrect and incomplete mapping should not be incorporated in planning documents and may open the door to potential litigation.</p> <p>Statements may create negative financial impact.</p>
S43.5	Mangaroa Peat Overlay Cost Benefit Analysis	Seek amendment	This CBA report is fatally flawed and should be struck from the PC47 documentation pending a complete and thorough re-write.	Cost benefit analysis reflects inadequate research and incorrect assumptions. Claims are not supported by evidence; peatland has been common knowledge for over 170 years and there is currently no risk to life or property.

Sub. Point	Provision	Support/Oppose/Seek amendment	Decision Sought	Reasons
S43.6	Mangaroa Peat Overlay Provisions	Seek amendment	This demonstrates a nonsense and establishes that the Mangaroa overlay is not necessary. All the rules are already in place to achieve the controls and protections necessary, and another layer of rules achieves nothing. Remove all references to the Mangaroa Peat Overlay from PC47 documentation.	S32 report states that under the Building Act in instances of poor ground conditions new buildings need to demonstrate appropriate foundations designed by an engineer. To prevent duplication no land use provisions are proposed for peatland overlay. However, proposed subdivision rules ensure that new lots have appropriate building platforms for future buildings or appropriate engineering solutions exist.
Submitter 44: Malcom Ayers				
S44.1	High Slope Hazard Overlay	Seek amendment	Request an in person physical site visit.	Significant part of property has been identified as slope areas where it is flat.
Submitter 45: Bruce Ridley				
S45.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S45.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			planning zone” for the High Slope Hazard zones.	change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S45.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S45.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S45.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils.	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S45.6	High Slope Hazard Overlay	Seek amendment	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			revisit the Lidar based information provided by Coffey. (Maps included in submission)	
S45.7	High Slope Hazard Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed slope hazard overlay – the flatter part is in the overlay while the steeper part is outside.
Submitter 46: Grant Boyd				
S46.1	Wellington Fault Overlay	Seek amendment	If any changes are to be made, then they must expressly acknowledge and declare that they do not apply to existing residential properties in Emerald Hill Drive. In particular, the right to rebuild an existing single storey timber framed dwelling must be recognised.	No evidence or justification requiring changes to the fault line location, hazard rating provisions or restrictions relating to existing residential properties in Emerald Hill Drive.
Submitter 47: David De Martin				
S47.1	High Slope Hazard Overlay	Oppose	If this effects the property value on either of my houses I will sue! Get rid of this rubbish. Also note that I am a retired property developer, so I know what I am talking about.	This includes steep sided banks on rural roads and a reserve which can never be built on, has never slipped, and is covered in dense bush. However, costs to affected people can be huge as they need to notify Council of any activity.
Submitter 48: Dean and Debbie Molony				
S48.1	High Slope Hazard Overlay	Oppose	Not stated.	Proposed plan mapping does not reflect our property.

Sub. Point	Provision	Support/Oppose/Seek amendment	Decision Sought	Reasons
Submitter 49: Nathan James Gardiner				
S49.1	High Slope Hazard Overlay	Seek amendment	To relook at the red line through my property.	Mapped area does not reflect reality.
Submitter 50: Paul Harris				
S50.1	High Slope Hazard Overlay PC 47 in relation to Moonshine Western Hills	Seek amendment	<p>That PC47 be removed from the west of the Moonshine Valley. My (north-western) neighbours have not been included and the mapping is inaccurate on my property. The Council contractor offered to correct this but as yet has not dealt with this despite communicating three times with him.</p> <p>The mapping after discussion has been completed with drones, low beam Lidar and local knowledge. The Lidar is inaccurate with pasture covered in scrub; the grade is overstated. There are better technologies more widely used for agriculture and slope mapping for the new winter grazing regulations.</p> <p>I have had an outside agency map the block, the PC47 mapping done by your outside contractor has overstated land over 26 degrees by 17ha.</p> <p>(Maps attached in submission)</p>	<p>Mapping the 26 degrees is not accurate. Identified area is regarded by GWRC as low erosion zone. Subjective approach to add this area, based on local knowledge, is unacceptable.</p> <p>Earthworks rules should be aligned or same as GWRC. Proposed limits are very low.</p> <p>Clear wording for the maintenance of existing roads, tracks culverts and drains should be explicit.</p> <p>Neighbouring steeper land is not included in red zone.</p> <p>Existing flat sites should be excluded.</p> <p>All recent developments in the area have avoided prominent ridgelines. No evidence of slipping erosion or movement in any farm tracks or houses over the last 20 years, very solid rock.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S50.2	Earthworks Limits	Seek amendment	That the earthworks limits of volume and areas reflect the needs of bigger farm properties.	
S50.3	Earthworks Rules	Seek amendment	That the earthwork rules be aligned with the GWRC rules to avoid over complexity.	
Submitter 51: M de Jong				
S51.1	High Slope Hazard Overlay	Oppose	Full impact analysis from the insurance industry for all hazard areas covering potential insurance premium increases and possible lack of insurance cover for some properties.	<p>Despite concerns regarding the impact of the plan change on property values, no efforts were made to consult the insurance industry. The expected economic cost associated with increased insurance premiums or the inability to obtain insurance has not been covered in the cost benefit analysis. There appears to be no plan to mitigate the economic risk or financial impact.</p> <p>While consultation was undertaken with property owners affected by the Wellington Fault Overlay and the Mangaroa Peat Overlay, no such consultation was undertaken with property owners affected by the proposed High Slope Hazard Overlay.</p> <p>Desk study assessments were not validated through site visits and anomalies were not investigated, resulting in inaccuracies.</p> <p>Main concerns raised in earlier consultation on Wellington Fault Line and Mangaroa Peat Overlay (impact of provisions on future development and insurance and opposition to mapping or provisions) have not been addressed. Objective of plan change is</p>
S51.2			Consult affected property owners in the High Slope Hazard Overlay as was done for the other hazard areas.	
S51.3			Perform site visits to validate the desk study assessed slope hazard mapping.	
S51.4			Determine the rate increase required to cover lost rates.	
S51.5			Rework and republish the plan, including cost benefit etc. incorporating public feedback and insurance industry input.	

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S51.6			Organises a vote for property owners in Upper Hutt as to whether to adopt the revised plan.	<p>to satisfy RMA requirements and ignores economic value destroyed, increased insurance premiums and rates forgone.</p> <p>Cost benefit analysis identifies minor savings over 20 years and ignores the cost from potential insurance impact and consequential drop in property value. Also not included is the loss of rates due to reduced rateable values and related rate increases.</p> <p>Cost benefit has been updated in relation to High Slope hazard to include:</p> <ul style="list-style-type: none"> • Economic value destroyed (\$655,800,000) • Increased insurance premiums (\$2,597,600) • Rates forgone (\$2,892,000 per year)
S51.7			Offer to purchase the properties which, as a result of the plan change, can no longer obtain insurance.	
S51.8			Offer to reimburse property owners for the reduced property value as a result of this plan change.	
Submitter 52: Greater Wellington Regional Council				
S52.1	PC47 - General	Support with amendment	Greater Wellington (GW) broadly supports the strategic direction of the proposed draft hazard provisions. In particular, the risk-based approach taken to managing development in natural hazard overlays using the framework of less sensitive, potentially sensitive and hazard sensitivity activities.	The issue that GW would most like to see clarified or addressed is within rules 7, 9 and 10 regarding clauses that require a consideration of the Wellington Fault relative to a development. GW would like to see a robust assessment of the fault location as part of the consent process to allow safe siting of buildings in the fault areas in order to fulfil this requirement.
S52.2	Objective NH-O1	Support with amendment	Replace wording 'does not significantly increase' with 'minimises':	GW supports the intent of this objective but has questions over the use of the term 'does not significantly increase' and whether a different term may be more appropriate in signalling the intent to reduce the impact from natural hazards as per Objective 19 of the Regional Policy Statement (RPS). It is noted that the draft

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<i>Subdivision, use and development within the Natural Hazard Overlays does not significantly increase <u>minimises</u> the risk to life or property.</i>	version did not include the word significant. GW acknowledges that it is difficult to not increase the risk with new development, however, there are an increasing number of methods and opportunities to reduce the risk from natural hazards through innovative development, through the use of green infrastructure or nature based solutions, as promoted by the RPS and discussed in the background to this chapter. The RPS change 1 natural hazard provisions promote the minimisation of risks from natural hazards and this may be an appropriate term to use in this Objective. The Natural Resources Plan defines minimise as 'to the lowest extent practicable'.
S52.3	Policy NH-P1	Support	Retain as worded.	Consistent with Policy 29 of the RPS and RPS change 1
S52.4	Policy NH-P2	Support	Retain as worded.	Consistent with Policy 29 of the RPS and RPS change 1
S52.5	Policy NH-P3	Amend	<p>Reword the policy to include:</p> <p><i>Provide for Hazard Sensitive and Potentially Hazard Sensitive Activities within the poorly constrained or the uncertain constrained areas of the Wellington Fault Overlay, <u>provided</u></i></p> <p><i><u>(a) New buildings and building platforms are located to avoid the fault, as advised by an appropriately qualified specialist.</u></i></p> <p>Specify in the associated rules that the fault in the uncertain - poorly constrained and uncertain - constrained fault areas be required to be identified by an appropriately</p>	<p>GW seeks that the policy also include a requirement that new builds and building platforms be located to avoid the fault within these zones, as advised by a geotech consultant similar to the requirements in policy 5 and 6.</p> <p>This will also require the rule to be modified to include the need to identify the fault trace, especially for Hazard Sensitive Activities, in the <i>uncertain – poorly constrained</i> and <i>uncertain - constrained</i> fault areas identified in the Wellington Fault Overlay.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			qualified specialist, especially for Hazard Sensitive Activities, and that building platforms avoid the fault.	
S52.6	Policy NH-P4	Support	Retain as worded.	Consistent with Policy 29 of the RPS and RPS change 1.
S52.7	Policy NH-P5	Support with amendments	<p>Clause (b) should be reworded to minimise the likelihood of damage</p> <p><i>A geotechnical assessment shows that there is the ability for appropriate mitigation options to be incorporated into the design of a future building to reduce minimise the likelihood of damage as a result of poor ground conditions on the identified building platform.</i></p>	GW seeks a change to the wording to include minimise rather than reduce the likelihood of damage from poor ground conditions. Mitigation methods have advanced sufficiently to point where this is achievable.
S52.8	Policy NH-P6	Support with amendments	<p>Delete 'will not unacceptably increase' from clause (a) and replace with 'minimise'</p> <p><i>A geotechnical assessment confirms that the proposed earthworks will not unacceptably increase <u>minimise</u> the risk from slope instability to people, and buildings</i></p>	GW seeks rewording to say that earthworks minimise the risk from slope instability. Slopes over 26 degrees as classified in this overlay are steep and prone to failure during wet conditions. Climate change will increase the risk of intense rainfall events and as a result increase the risk from land slips.
S52.9	Policy NH-P7	Support with amendments	<p>Delete 'will not increase or accelerate' and replace with 'does not cause'</p> <p><i>The subdivision will not increase or accelerate <u>does not cause</u> land instability on the site or adjoining properties.</i></p>	GW seeks rewording to say that the subdivision will not cause any increase in land instability in adjacent areas.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S52.10	Rules NH-R1, NH-R2, NH-S1	Support	Retain as worded.	Consistent with the direction and intent of the RPS and RPS change 1.
S52.11	Rule NH-R7	Amend	<p>Require a suitably qualified expert to provide advice on the best location for building platforms for new builds in the uncertain - poorly constrained and uncertain - constrained fault areas:</p> <p><i>(b) The location of the building relative to the <u>fault trace</u> line as advised by a suitably qualified expert and any mitigation measures to reduce the impacts from fault rupture.</i></p>	<p>The fault zones identified in the Wellington Fault Overlay relate to the degree of uncertainty about the location of the fault trace. The <i>uncertain – poorly constrained</i> and <i>uncertain - constrained</i> areas have been classified as such by GNS Science because there isn't enough information to locate the fault on the surface. This requires a site specific investigation. An indicative trace is used to define the zone, but the uncertainty remains. Therefore, in the matters of control clause (b) where there is a requirement to consider the location of the building relative to the fault, which GW supports, there should also be a requirement for a suitably qualified expert to provide advice on the best location for building platforms for new builds, especially for hazard sensitive activities.</p> <p>The clause also refers to the fault as a line. As GNS states in the Upper Hutt City Fault Trace Report (2005), generally, a fault is a zone of deformation rather than a single linear feature. For this reason, seismic hazard science refers to faults as a 'fault trace' rather than a 'fault line' as this creates a misleading impression that the feature is a neat easily identified line in the landscape. As the fault zones attest to, this is not the case. GW seeks that the word 'line' be either deleted or replaced with 'trace'.</p>
S52.12	Rule NH-R9	Amend	Delete clause (a) Compliance is not achieved with NH-R2-1(a) and make compliance with this standard a matter of discretion:	It's unclear what clause (b) of the matters of discretion will actually achieve. The <i>well-defined</i> and <i>well defined - extended</i> areas of the Wellington Fault Overlay are essentially the fault. Thus, assessing the location of the additions relative to the fault

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>(a) Compliance is not achieved with NH-R2-1(a) or</p> <p>(b) <i>The additions are located within the well-defined or well-defined extension areas of the Wellington Fault Overlay.</i></p> <p><i>Matters of discretion are restricted to:</i></p> <p>a) <i>The change in risk to life as a result of the additions being undertaken on the site;</i></p> <p>b) <i>The location of the additions relative to the fault trace line and any mitigation measures to reduce the impacts to life and buildings from fault rupture <u>and</u>;</i></p> <p>c) <u>Where the proposal meets NH-S1.</u></p>	<p>will achieve little considering that the extension will effectively be occurring on the Wellington Fault. In addition to giving effect to clause (c) of NH-P4, there should also be a requirement to comply with area limitations specified in NH-S1, thereby limiting increasing risk by building and further intensifying on the Wellington Fault. This is a high hazard area and additions to buildings should be limited.</p> <p>Also, as per the discussion for NH-R7, GW seeks that the word 'line' be either deleted or replaced with 'trace'.</p>
S52.13	Rule NH-R10	Amend	<p>Require a suitably qualified expert to provide advice on the best location for building platforms for new builds in the uncertain - poorly constrained and uncertain - constrained fault areas:</p> <p>(c) <i>The location of the building relative to the fault trace line <u>as advised by a suitably qualified expert</u> and any mitigation measures to reduce the impacts from fault rupture.</i></p>	<p>Also, as per the discussion for NH-R7, GW seeks that in the matters of control clause (c) where there is a requirement to consider the location of the building relative to the fault, there should be a requirement for a suitably qualified expert to provide advice on the best location for building platforms for new builds, especially for hazard sensitive activities and that the word 'line' be either deleted or replaced with 'trace'.</p>
S52.14	Rule NH-R23	Support	Retain as worded.	Consistent with the direction and intent of the RPS and RPS change 1.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S52.15	AER NH-AER1	Support with amendment	<i>Subdivision, use and development within the Natural Hazard Overlays <u>minimises</u> does not significantly increase the risk to life or property.</i>	GW seeks that the AER be reworded to say that development minimises the risk.
S52.16	Appendix 4 - Definitions Hazard sensitivity classifications	Support with amendment	- Include service stations in the Hazard Sensitive Activities list.	GW seeks that service stations be removed from the Potentially Hazard Sensitive Activities list and added to the Hazard Sensitive Activities list, considering they contain storage facilities for highly flammable fuels and gas.
S52.17	SUB-GEN-R3	Support with consequential amendment	Clause (b) of NH-P5 should be reworded to minimise the likelihood of damage <i>A geotechnical assessment shows that there is the ability for appropriate mitigation options to be incorporated into the design of a future building to reduce minimise the likelihood of damage as a result of poor ground conditions on the identified building platform.</i>	GW seeks a change to the wording to include minimise in NH-P5 rather than reduce the likelihood of damage from poor ground conditions. Mitigation methods have advanced sufficiently to the point where this is achievable.
S52.18	SUB-GEN-R4	Support with consequential amendment	Delete 'will not increase or accelerate' in NH-P7 and replace with 'does not cause' <i>The subdivision will not increase or accelerate <u>does not cause</u> land instability on the site or adjoining properties.</i>	GW seeks rewording to NH-P7 to say that the subdivision will not cause any increase in land instability in adjacent areas.
S52.19	SUB-GEN-R5	Amend	Require a suitably qualified expert to provide advice on the best location for building platforms in the uncertain - poorly	In the matters of discretion clause (c) where there is a requirement to consider the location of the building platform relative to the fault, which GW supports, there should also be a requirement for a suitably qualified expert to provide advice on

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>constrained and uncertain - constrained fault areas and replace fault line with fault trace:</p> <p><i>(b) The location of the building platform relative to the fault trace line as advised by a suitably qualified expert and any mitigation measures to reduce the impacts from fault rupture.</i></p>	<p>the best location for these building platforms, especially for hazard sensitive activities.</p> <p>As discussed in the natural hazard's rules above, replace fault line with fault trace.</p>
S52.20	SUB-GEN-R10	Support	Note that the abbreviation in the table should be corrected from DIS to NC.	GW supports this as a non-complying activity.
S52.21	EW-R9	Support with consequential amendments	<p>Delete 'will not unacceptably increase' from clause (a) in NH-P6 and replace with 'minimise'</p> <p><i>A geotechnical assessment confirms that the proposed earthworks will not unacceptably increase minimise the risk from slope instability to people, and buildings</i></p>	GW seeks rewording to NH-P6 to say that earthworks minimise the risk from slope instability. Slopes over 26 degrees as classified in this overlay are steep and prone to failure during wet conditions. Climate change will increase the risk of intense rainfall events and as a result increase the risk from land slips.
Submitter 53: Kevin Trotter				
S53.1	High Slope Hazard Overlay	Oppose	Find someone more competent to assess the matter and if needed try at a later date.	Contractor's report should be dismissed as erroneous and ask for refund of service paid for by ratepayers.
Submitter 54: D Johnson				
S54.1	High Slope Hazard Overlay	Seek amendment	Remove the slope hazard from 11 Ronald Scott Grove, Riverstone Terraces, Upper Hutt.	Section of property that has been assessed as hazard slope is not correct and needs to be reassessed. Property has not been adequately investigated to inform plan change. Hazard has been incorrectly identified and should be reviewed.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 55: Katelyn King				
S55.1	High Slope Hazard Overlay	Seek amendment	Alterations to the mapping of our property at 148 Kakariki Way.	Two areas identified as slope hazard on the property need to be amended as they cover flat areas.
S55.2	High Slope Hazard Overlay	Seek amendment	Consider changing the title of the 'High Slope Hazard' provision to a less inflammatory title to capture what is actually intended by this provision. A suggestion is 'Slope Area'.	'High Slope Hazard' is inflammatory and sounds like all affected areas are dangerous while slopes have not been assessed individually to determine actual hazard. This classification could put people off buying properties. Slope Area would be a more appropriate description. (Supporting maps and photographs attached)
Submitter 56: Elena Goff				
S56.1	High Slope Hazard Overlay	Seek amendment	Only slope is a hazard not the whole property and slope should be in red colour on the plan not the property.	If the slope is a hazard, it should be in red but not the whole property. Would like to see all the property in usual colours. House may lose market value. When property was bought 12 years ago Council advised this area was not dangerous. Who will compensate for losses?
Submitter 57: Christine Lehmann				
S57.1	Mangaroa Peat Overlay	Seek amendment	Remove high slope hazard band of my property. <i>(Note: submission corrected from initial request which requested removal of peat risk band from property)</i>	Map incorrectly identifies a small portion of slope on my property to be potentially affected by slope risk. Identified slope is across a flat road, nearest hills are further away, which are not on my property and of no risk to anybody.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 58: Jeff Price				
S58.1	High Slope Hazard Overlay	Seek amendment	<p>To have the following areas removed as 'High Slope Hazards' - not in red as per plan of local area:</p> <ul style="list-style-type: none"> • Lower driveway on south side • Lower driveway on north side into bush • Southwest side of house (too close) • Back yard – bush fence internal area • 'Landing' at northwest corner of property • Below house about halfway to property border 	<p>Slope failure is due to at least 3 factors – slope angle, water catchment area and vegetation type and cover. Based on these factors some high slope hazards on the property should not be included.</p> <p>A detailed description and map of the identified areas is provided.</p>
Submitter 59: John and Lynne Hill				
S59.1	Mangaroa Peat Overlay	Seek amendment	<p>PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.</p>	<p>Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.</p>
S59.2	Mangaroa Peat Overlay	Seek amendment	<p>Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope</p>	<p>RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S59.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S59.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S59.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS – Mangaroa Valley Soils.	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S59.6	High Slope Hazard Overlay	Seek amendment	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
S59.7	High Slope Hazard Overlay Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed slope hazard overlay/peatland overlay – the flatter part is in the overlay while the steeper part is outside.
Submitter 60: Weston Hill				
S60.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S60.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			planning zone” for the High Slope Hazard zones.	maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S60.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S60.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S60.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS – Mangaroa Valley Soils.	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S60.6	High Slope Hazard Overlay	Seek amendment	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	
S60.7	High Slope Hazard Overlay Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed slope hazard overlay/peatland overlay – the flatter part is in the overlay while the steeper part is outside.
Submitter 61: Mark Robbins				
S61.1	High Slope Hazard Overlay	Seek amendment	Amendment of the high slope hazard to accurately reflect the actual situation - this may necessitate a visit by UHCC officers.	The shading on the map does not reflect the actual slope hazard. The map shades parts of the property as high slope hazard that aren't, in particular the north-western corner of the property.
Submitter 62: Anna Brodie and Mark Leckie				
S62.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for building. That may mean a more streamlined approach for an additional dwelling ie for an elderly relative. In those cases, a single approach to an engineer is to be preferred to keep costs down.	The need to ensure that subdivision or additional buildings are consented is acknowledged. Peat is a soil type, not a hazard. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S62.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” instead of Mangaroa Peatlands Hazard or remove hazard from PC47 as it is unsubstantiated hazard.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like Katherine Mansfield and surrounding areas. UHCC hazard overlays should not be released in their current form.
S62.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk to feed into the building consent process with appropriate engineering report is required.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S62.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S62.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils.	of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S62.6	Mangaroa Peat Overlay	Seek amendment	Please review your map overlays with accurate topical evidence.	The property is poorly represented by the current proposed peatland overlay. Includes area known to be clay or sloping or missed soil types with existing dwellings and flooding could be rectified with better maintenance of the waterways.
Submitter 63: Gregor and Stephanie Kempt				
S63.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S63.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S63.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S63.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S63.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S63.6	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed peatland overlay – the flatter part is in the overlay while the steeper part is outside. The paddock was engineered to include drainage so does not show the vegetation other non-engineered land does i.e.,

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				tussock etc. Relatively deep holes dug on the land do not show any signs of peat more topsoil than clay.
Submitter 64: Richard and Carol Dormer				
S64.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S64.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland from GWRC’s goals.
S64.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Mangaroa Peatlands and High slope zone as some risk	accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S64.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S64.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S64.6	Mangaroa Peat Overlay	Oppose	Not stated	Take exception to the property being identified as a hazard. Unclear how peat integrated with clay is a danger to human wellbeing. Recent site visit resulted in amendments and showed lack of interest in evidence by council until challenged.
Submitter 65: Gavin Burgess				
S65.1	High Slope Hazard Overlay	Seek amendment	The hazard line is lower to the bush line and should be removed from the lounge area of my house.	The hazard area over the lounge area of my house and round about is not correct. This was cut and lowered from original ground.
Submitter 66: Judith and Sandy Kauika-Stevens				
S66.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S66.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S66.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S66.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S66.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S66.6	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
S66.7	Slope Hazard Overlay / Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed slope hazard overlay/peatland overlay – the flatter part is in the overlay while the steeper part is outside.
Submitter 67: Philip Clegg				
S67.1	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. Current peat maps do not provide details on height and depth of peat. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. RPS change 1

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley.
S67.2	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S67.3	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the Peat defined in the Soil Bureau survey of the peatland and documented in this Overlay: ArcGIS - Mangaroa Valley Soils.	Recent court action showed that very little study has been done into peat extent and that current science and charts are based on 1980's soil samples and estimations. It does not consider shrinkage and soil blending especially around the edges. Any boundaries should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S67.4	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Recent reports and information are not included in the mapping. Extensive geotech reports and recent findings from subdivision and earthworks consents are not reflected in maps. Clearly flat areas are shown as high slope risk. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S67.5	Slope Hazard Overlay	Seek amendment	Please feel free to arrange to come and see my property and we can see the disparity between the overlay and the actual land on my property and those of my neighbours.	The property is poorly represented by the current proposed slope hazard overlay – the flatter part is in the overlay while the steeper part is outside.
Submitter 68: Jeff and Noeline Berkett				
S68.1	Slope Hazard Overlay	Seek amendment	Before this Plan is discussed, there should be some study of soil and ground composition throughout the affected areas.	<p>Disagree with the extent of the proposed hazard areas. There is no evidence that soil and ground composition have been taken into account.</p> <p>Recent heavy rain events and previous earthquakes have not resulted in slips or subsidence in the area.</p> <p>About 80ha of our property was cleared and are now cultivated as grass with no slippages.</p>
Submitter 69: Nicole and Dave Tyson				
S69.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for building. That may mean a more streamlined approach for an additional dwelling i.e., for an elderly relative. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Acknowledge need to consent subdivision and additional buildings. Peat is a soil type, not a hazard and there are existing consented structures. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S69.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” instead of	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Mangaroa Peatlands Hazard or remove hazard from PC47 as it is unsubstantiated hazard	likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like Katherine Mansfield and surrounding areas. The current overlay is generalised and does not clearly identify why it is a hazard.
S69.3	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk to feed into the building consent process with appropriate engineering report is required.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S69.4	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S69.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S69.6	Mangaroa Peat Overlay	Seek amendment	Please review your map overlays with accurate topical evidence.	The property is poorly represented by the current proposed peatland overlay – includes area known to be clay or sloping or missed soil types with existing dwellings and flooding could be rectified with better maintenance of the waterways.
Submitter 70: Roger O'Brien				
S70.1	Mangaroa Peat Overlay	Oppose	Not stated	<p>Emotionally charged language (e.g., 'hazardous', 'high risk') misrepresents peat and is highly prejudicial.</p> <p>Peat is neither hazardous from a liquefaction perspective or a foundation design viewpoint. Peat is only hazardous if it catches fire.</p> <p>Submission provides further explanation of the nature and formation of peat.</p> <p>In a soil layer system, such as on the edge of Katherine Mansfield Drive, the peat lies on a layer of blue/grey clay and that in turn lies on a layer of gravels, all laid down naturally.</p> <p>Peat soil requires a sensible design approach to any building foundation. Current building consent and subdivision consent processes sufficiently cover building foundation requirements.</p> <p>The peat extent map is incorrect, especially in the Katherine Mansfield Drive area.</p>
S70.2	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S70.3	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S70.4	PC47 - General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S70.5	PC47 - General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S70.6	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S70.7	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
S70.8	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed peatland overlay.
Submitter 71: Paul Dyson				
S71.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			engineer is to be preferred to keep costs down.	
S71.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like "Sensitive land planning zone" for the Mangaroa Peatlands Hazard and "Slope assessment planning zone" or "Soil type Risk planning zone" for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S71.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S71.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S71.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
Submitter 72: Mike Philpott				
S72.1	Slope Hazard Overlay	Seek amendment	Please correct the current hazard slip zone map surrounding 4 Morepork Close, Brown Owl.	Current slip zone marking cuts directly through dwelling located on flat land and marks 90% of the dwelling as red zone. While there is a bank adjacent to the site, the section is terraced and flat.
Submitter 73: Paul Dansted and Sarah Kerkin				
S73.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Agree with goal to ensure that subdivisions are consented with viable building platforms. Peat is just another soil type and needs special treatment but isn’t hazardous in itself. Calling peat hazardous may result in regional-level planning statements aiming at depopulating, flooding, and restoring functioning peatlands. PC47 may create duplication which could be avoided by taking a more pragmatic approach.
S73.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S73.3	General	Seek amendment	Have three categories for each hazard, No risk, some risk, and High risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S73.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S73.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S73.6	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			revisit the Lidar based information provided by Coffey. (Maps included in submission)	
Submitter 74: Paul Lunn				
S74.1	Slope Hazard Overlay	Seek amendment	I would like our property at 5 Valley View Way to be excluded from the proposed high slope risk area.	Dwelling and land would be partially affected by high slope hazard area which appears incorrect. Would like more evidence to suggest that the property should be included. No slippage in 10 years, house has been professionally engineered and has several piles down to rock.
Submitter 75: Adam Pawlak				
S75.1	Slope Hazard Overlay Earthworks provisions	Seek amendment	Council is to accurately map properties or inspect proposed build sites so area that are less than the proposed 26deg slope hazard is excluded from the draft mapping rather than the blanket mapping that is happening now or go off existing geotech reports so there is no reduplication occurring requiring new owners to prove that the proposed earthworks are not on a slope hazard.	No support for proposed rules which require resource consent for all earthworks for building platforms in the High Slope Hazard Overlay. Overlay is highly inaccurate capturing areas of properties that are less than 26 degrees. Approved subdivision required geotech report due to proposed hazard overlays which found that mapping was not accurate. Cost analysis understates the number of effected properties and the activities that require resource consent.
S75.2	Slope Hazard Overlay Earthworks provisions	Seek amendment	Existing earthworks standards are minimal, if are to incl. to build on slopes greater than 26deg (cut off for earth works is 28degs under current plan) then fine but is it would be more suitable for the owner to provide a geotech report covering proposed earthworks	Existing provisions only allow for minimal earthworks. Plan change will result in unnecessary section 72 notifications on certificates of title.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			if they meet the permitted standard, earthworks rules already provide for earthworks not on a slope of greater than 28degs requires a resource consent. The proposed slope hazard to match 28degs in existing earthworks rules (what effect will 2degs create) as consultants do not provide the reports in a timely manner to applicants / owners.	
S75.3	Slope Hazard Overlay Earthworks provisions	Seek amendment	Existing earthworks standards retained, if the mapping is done accurately then owners will be able to see where they can do earthworks and where they will require a resource consent.	
Submitter 76: Heather McKay				
S76.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S76.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S76.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S76.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S76.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S76.6	Mangaroa Peat Overlay	Seek amendment	Not stated	According to the map our house is built on peat, which it is not, our house is on a clay type mound.
Submitter 77: Colin Hawes				
S77.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S77.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S77.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S77.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S77.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils.	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S77.6	Mangaroa Peat Overlay	Seek amendment	Not stated	According to the map our house is built on peat, which it is not, our house is on a clay type mound.
Submitter 78: Steven Robertson				
S78.1	High Slope Natural Hazards	Seek amendment	Add or amend the proposed rules to require a geotechnical assessment for significant earthworks rather than just those earthworks related to building platforms.	NH-P6 requires geotechnical assessments but the only references to this policy in the rules (NH-R5 and NH-R6) are limited to building platforms. This is too narrow as significant earthworks could occur without a building platform (e.g., building driveways or removing trees including roots).
Submitter 79: Heather Blissett				
S79.1	Terminology	Seek amendment	Using terminology that demonstrates that we are living with the whenua and not in	Change wording as follows:

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			opposition to with Papatūānuku already being the enemy.	<ul style="list-style-type: none"> • ‘Natural Hazard’ to ‘Environmental Assets affecting people’ or ‘Human Hazards affecting Environmental Assets’ • ‘Management of natural hazards’ to ‘protection of Environmental Assets affecting people’ • ‘Climate Change’ to ‘human induced climate destruction’ <p>Rather than managing the risk from natural hazards on people it should be about protecting Papatūānuku from risk from human hazards.</p>
Submitter 80: Scott and Nicola Whitman				
S80.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S80.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision,

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S80.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S80.4	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
Submitter 81: Karen Leishman and Christopher Griffin				
S81.1	Mapping	Seek amendment	A reassessment of the slope identification.	Disagree with the slope identification on the property.
Submitter 82: Ministry of Education				
S82.1	General	Support with amendments	That the requested additions, amendments, or retentions to PC47, as set out below, be adopted and any consequential amendments required to give effect to the matters raised in this submission.	Ministry has particular interest in aspects of PC47 that impact on management and operation of existing or new educational facilities, e.g., the inclusion of educational facilities in Hazard Sensitive Activities and resulting provisions.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				<p>While most existing and new educational facilities are designated, the proposed provisions are important for those facilities that aren't designated.</p> <p>There are two existing educational facilities located in the Natural Hazards Overlays (Plateau School [designated] – High Slope Hazard Overlay, Irmgard Ritchie Kindergarten [not designated] – Wellington Fault Band Overlay).</p>
S82.2	3.1 Definitions Hazard Sensitive Activity	Support	Retain as proposed	Proposed definition promotes the management of hazard risks and effects on educational facility.
S82.3	NH-O1	Support	Retain as proposed	Objective acknowledges the risk that natural hazards pose to educational facilities.
S82.4	NH-P3	Support	Retain as proposed	Policy allows for the establishment of educational facilities in the poorly constrained or the uncertain constrained areas of the Wellington Fault Overlay.
S82.5	NH-P4	Support	Retain as proposed	<p>While typically trying to avoid the location of new schools in the well-defined and well-defined extension area, there may be an operational need to establish educational facilities in the Wellington Fault Overlay to provide social infrastructure for existing communities located in and around the fault line.</p> <p>Support for consideration whether there is an operational need for buildings to be located within the High Hazard Area, provided they can be designed to avoid any risks to people and property.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S82.6	NH-P5	Support	Retain as proposed	Support for allowing for the establishment of new building platforms for educational facilities if it can be demonstrated that the ground is suitable for the building type and appropriate mitigation is adopted into the design.
S82.7	NH-P6	Support	Retain as proposed	Support for allowing for earthworks within the High Slope Hazard area where it can be demonstrated that the proposed earthworks will not unacceptably increase the risk from slope instability to people, and buildings.
S82.8	NH-R7	Support	Retain as proposed	Support for the establishment of Hazard Sensitive Activities in poorly constrained or the uncertain constrained areas of the Wellington Fault Overlay as a controlled activity. Matters of control are appropriate.
S82.9	NH-R10	Support	Retain as proposed	Supports for Hazard Sensitive Activities, such as schools, establishing in the Wellington Fault Overlay as a restricted discretionary activity. Matters of discretion are appropriate.
S82.10	New Rule	Seek amendment	New provision – <u>Discretionary Activities</u> <i><u>Potentially Hazard Sensitive Activities and Hazard Sensitive Activities in the Wellington Fault Overlay</u></i> <i><u>The building is located within the well-defined or well-defined extension areas of the Wellington Fault Overlay where it can meet the requirements below and outlined in NH-P4</u></i>	Policy NH-P4 sets out a framework that allows hazard sensitive activities to establish in the well-defined or well-defined extension areas of the Wellington Fault Overlay, provided they can meet certain criteria. PC47 then lists Hazard Sensitive Activities as non-complying activity under NH-R23. These two provisions appear to contradict each other. Therefore, a new activity status for Hazard Sensitive Activities as a discretionary activity is recommended, provided it meets the criteria set out under NHP4.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p><i>It must be demonstrated that:</i></p> <p><i>a. The activity or subdivision has a critical regional or nationally important operational and functional need to locate or occur within the High Hazard Areas and locating or occurring outside the High Hazard Areas is not a practicable option; and</i></p> <p><i>b. The building, activity or subdivision incorporates mitigation measures that demonstrate that risk to people, and property is avoided; and c. For additions to existing buildings, the change in risk from fault rupture to people, buildings is not increased.</i></p>	<p>If the activity does not meet the criteria, the activity becomes a non-complying activity under NH-R23.</p>
S82.11	NH-R23	Seek amendment	<p>Non Complying Activities</p> <p><i>Potentially Hazard Sensitive Activities and Hazard Sensitive Activities in the Wellington Fault Overlay</i></p> <p><i>Where:</i></p> <p><i>a. The building is located within the well-defined or well-defined extension areas of the Wellington Fault Overlay; and</i></p> <p><i>b. It does not comply with the criteria in NH-P4 [or reference the new provision above].</i></p>	<p>Not stated (refer to reasons outlined above)</p>

Sub. Point	Provision	Support/Oppose/Seek amendment	Decision Sought	Reasons
82.12	EW-R9	Support	Retain as proposed.	Support for earthworks for Hazard Sensitive Activities, such as schools, to be a restricted discretionary activity provided they comply with the matters outlined in NH-P6.
Submitter 83: Gerald Keown				
S83.1	Mangaroa Peat Overlay	Oppose	Not stated	When building on the site 30 years ago UHCC requested an engineering report to establish the suitability of the building site. Findings of site visit and previous test results were ignored.
S83.2	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S83.3	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like "Sensitive land planning zone" for the Mangaroa Peatlands Hazard and "Slope assessment planning zone" or "Soil type Risk planning zone" for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S83.4	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S83.5	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S83.6	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S83.7	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed peatland overlay – plan change incorrectly identifies the whole site as peatland (despite previous report having been provided to Council).

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 84: Wendy Botha				
S84.1	Mangaroa Valley High Slope Hazard Zone	Oppose	To remove the high slope hazard restriction on our property at Mangaroa Valley Road. Please stop adding unnecessary cost to the rate payers and owners. UHCC and GWRC should not be able to add additional rules to boost their bank accounts.	Engineers report is generic. Plan change will only generate another unnecessary cost and restrictions to landowners.
Submitter 85: Jemma and AJ Ragg				
S85.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S85.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S85.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S85.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S85.5	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
Submitter 86: Evie Gray				
S86.1	Slope Hazard Overlay	Oppose	Not stated	Map has not been developed with sufficient level of detail and is incorrect – steep areas are excluded, and flat areas are included.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				I do not support this plan change as currently written. Proposal makes currently empty section even harder to build on. Rates should be adjusted downwards due to decreased property value.
Submitter 87: Andrea Follett				
S87.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S87.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like "Sensitive land planning zone" for the Mangaroa Peatlands Hazard and "Slope assessment planning zone" or "Soil type Risk planning zone" for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S87.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S87.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S87.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
Submitter 88: Grant O'Brien				
S88.1	PC47 – General Hazard Maps	Seek amendment	The Poor Ground Condition Overlay and the High Slope Hazard Overlay need to be accurately defined using an accepted methodology, with evidence provided. UHCC and landowners must be absolutely satisfied that the overlays are accurate and is a true representation of the soil types and ground condition. For future geotechnical testing and engineering assessment that proves the inaccuracy and misleading nature of the overlays, the UHCC would be required for full reimbursement of the investigation costs and	PC47 Hazard Maps are required to be highly accurate and be defined using accepted scientific and engineering best practices and incorporate the vertical dimension (i.e., significant thickness). Current boundaries and extent of the peat overlay are incorrect. Most accurate outline currently available is from survey of soil types called 'Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand'.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			the implications of the costs occurred by the landowner imposed on them by other authorities and insurance.	<p>PC47 does not use commonly accepted methodology to determine soil types and does not identify thickness/depth of the overlay.</p> <p>UHCC requires the identification of suitable building platforms as part of subdivision – separate resource consent appears unnecessary.</p> <p>Maps may be used by other authorities (e.g. GWRC) to impose significant burdens on landowners.</p>
S88.2	PC47 – General Hazard Assessments	Seek amendment	PC47 reviews the hazards and risks and adopts a hazard and risk weighting system utilising current accepted engineering solutions to mitigate the perceived hazards. UHCC/PC47 may need to work with New Zealand’s engineering community to understand how hazards and risks can be understood mitigated.	<p>PC47 shows an inconsistent approach to imposing resource consents for subdivision and favours subdivision on the higher risk hazards in the region (Wellington Fault and High Slope Hazards).</p> <p>While Wellington Fault is considered highest risk hazard PC 47 only requires subdivision consent in the Poor Ground Condition Overlay.</p> <p>Poor ground conditions pose a smaller hazard than an active fault. Foundations can be reliably engineered. Risk for subdivision and building on Poor Ground Condition Overlay can be mitigated via established building consent process. The ‘poor ground conditions’ appear to be the lowest hazard area outlined in PC47.</p>
S88.3	PC47 – General Hazard Assessments	Seek amendment	The engineering and scientific methodology and assessments in PC47 require an external peer review process by adequately experienced and recognised professionals (i.e., that is not already a preferred supplier to UHCC), the process should be overseen by a professional governing body such as Engineering NZ. The implications of the policies, planning and rules of PC47 that will be enforced on landowners are required to be	<p>High slope hazards can be overcome through appropriate engineering solutions. However high slope hazard land evolves (greater rainfall intensity, earthquakes) and the risk increases over time. The ‘high slope land conditions’ appear to be of</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>reviewed from a legal perspective incorporating Tikanga.</p>	<p>inherently higher hazard and risk than the ‘poor ground conditions’ and are the intermediary hazard outlined in PC47.</p> <p>It is accepted that engineering buildings to withstand significant proximal earthquake-induced shaking is complex and that there are no engineering solutions for the fault hazard itself. The Wellington Fault is clearly the greatest hazard with the highest risk outlined in PC47.</p> <p>The different hazard assessments, their weighting and how they will be incorporated are inconsistent and should be peer reviewed.</p>
S88.4	PC47 - General	Seek amendment	<p>The cost benefit analysis should be withdrawn and corrected with actual facts. If any assumptions are left in place, it is required that these are highlighted and made clear and any liability stemming from these assumptions will be owned by UHCC and cannot be imposed back on the landowner. The UHCC should consider fully compensating landowners for enforcing any loss of livelihood.</p>	<p>The PC47 cost benefit analysis provided by UHCC is misguided, has been based on inadequate assumptions and is not robust or factual.</p> <p>Cost benefit analysis is inaccurate, unreliable and if exhibited actually dangerous. Poorly qualified assumptions regarding risk to life and property are contradictory to ground-truthed history.</p> <p>It discounts the impacts of hazard overlays on people already living in the area (e.g., land value, insurability, regulatory misfeasance by GWRC).</p> <p>Cost benefit analysis over-estimates the risk and discounts the feasibility of accepted and regulated engineering solutions.</p>
S88.5	PC47 - General	Seek amendment	<p>Adopt more appropriate terminology that reflects the UHCC intentions for PC47 and change the names of the hazard overlay zones. More appropriate terminologies include: “Sensitive Land Planning Zone” or</p>	<p>Terminology that has been used in PC47 is misleading and inaccurate and will have unintentional consequences.</p> <p>PC47 uses derogatory and incorrect terms such as ‘poor’ to label certain soil types/ground conditions. Previous earthquakes show</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			<p>“Soil Type Based Planning Zone” for the Mangaroa Peatlands where the hazards can be mitigated via accepted engineering solutions, and “Slope Assessment Planning Zone” or “High Slope Planning Zone” for the High Slope Hazard zones. Considering this approach “Wellington Fault Trace Hazard Zone” remains appropriate for areas proximal or within near-field distances to the fault trace.</p>	<p>that ground conditions in Poor Ground Conditions Overlay recover quickly while impact close to fault is far more disruptive.</p> <p>The terms ‘hazard’ or ‘risk’ are not appropriate for land where the associated hazards/risks can be mitigated through accepted and standard engineering solutions.</p>
S88.6	Mangaroa Peat Overlay	Seek amendment	<p>The proposed requirement in PC47 for resource consent to be needed for subdivision of land within the Poor Ground Condition Overlay be withdrawn, as the already existing UHCC plan manages this appropriately.</p>	<p>PC47 has the potential to discriminate against those with lower socioeconomic status and the elderly and promote unsustainable living.</p> <p>PC47 will add another unreasonable and unnecessary cost and burden to already struggling landowner and whanau. Intent of PC47 is to stop further residential buildings from being built and housing families, and instead promotes this for businesses or those with the wealth to fund resource consents and navigate the process. Existing minimum subdivision size for rural land is already limiting the ability for future subdivision. Unclear how PC47 applies to land partially within the overlay.</p>
Submitter 89: Kerry Ryan				
S89.1	General	Seek amendment	<p>Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.</p>	<p>RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S89.2	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S89.3	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey	Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
S89.4	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed peatland overlay – the front part of the section should not be included. When Council visited no geological assessments were undertaken.
Submitter 90: Lisa Keown				
S90.1	General	Oppose	Not stated	Cleared the property from gorse and planted over 30 years. Initial engineering reports confirmed several good building sites. This is now threatened by the plan change.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S90.2	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S90.3	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like "Sensitive land planning zone" for the Mangaroa Peatlands Hazard and "Slope assessment planning zone" or "Soil type Risk planning zone" for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC's goals.
S90.4	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
S90.5	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S90.6	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S90.7	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed peatland overlay – plan change incorrectly identifies the whole site as peatland (despite previous report having been provided to Council).
Submitter 91: Grant and Melanie Avery				
S91.1	High Slope Hazard Overlay	Seek amendment	Amendment of the PC47 "High Slope Hazard Overlay" concerning and in the area of our property at 3 Valley View Way, Timberlea Upper Hutt, per our recommended overlay-amendment as Figure 3. This amendment is sought for the reasons stated, and which we have expanded on in our Figs. 1, 1b, 1c, 2.	Large areas of the property identified as High Slope Hazard do not have a slope of 26 degrees or greater and/or do comprise an engineered bank, constructed when the subdivision was first built. These areas should be corrected. A number of other locations with comparable engineered banks are not rated as High Slope Hazard. Consistency is important for effective hazard management and fair and consistent treatment of ratepayers. (Annotated figures included in full submission).

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			(Annotated figures included in full submission).	
Submitter 92: Chris and Jen Priest				
S92.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S92.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S92.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Mangaroa Peatlands and High slope zone as some risk.	accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S92.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S92.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S92.6	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	The property is poorly represented by the current proposed peatland overlay – the flatter part is in the overlay while the steeper part is outside, and the peat maps include too much land.
Submitter 93: Emma Zee				
S93.1	High Slope Hazard Overlay	Seek amendment	I would like an amendment considered to the extent of the hazard area to more accurately reflect the slope which would exclude my dwelling from the hazard area.	House is shown half within, half outside of the high slope hazard area and should be amended to reflect the slope and exclude the dwelling more correctly.

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
Submitter 94: Cushla and Vaughan Majendie				
S94.1	Mangaroa Peat Overlay	Seek amendment	We do not wish to accept the Council's current assessment of the peat lands on our property.	Identification of the location of peat land is inaccurate. Testing and analysis are not thorough enough to ensure the required accuracy. Details held by Council should be accurate to avoid unnecessary time and cost for future needs.
Submitter 95: Pat van Berkel				
S95.1	Mangaroa Peat Overlay	Seek amendment	Acknowledge that the Section 32 report omits mention of the importance of the Peatland from an ecological viewpoint and as a carbon sink.	Submission phases for PC47 and PC49 (Silverstream Spur) overlap, making it harder for citizens to give proper consideration. The Mangaroa Peatland is a regional treasure that must be protected from development and restored as a functioning peatland.
S95.2	Mangaroa Peat Overlay	Seek amendment	Update the Section 32 report to analyse the significance of the Peatland and its value as a carbon sink. Furthermore, analyse the application of Section 5 (2) b of the RMA, and Section 3.22 of the NPS-FW.	The Mangaroa Peatland is a Significant Natural Area. Recognition as a SNA would prevent development, thereby reducing the need to recognise it as a hazard. The National Policy Statement for Freshwater does not allow for development on wetlands (including peatlands) which needs to be recognised by the section 32 report.
S95.3	Mangaroa Peat Overlay	Seek amendment	Recognise that building development is completely inappropriate on the Mangaroa Peatland.	The Mangaroa Peatland contains large amounts of carbon which will be released if the peatland declines. Climate change needs to be considered in all UHCC planning documents. The peatland must be restored as a functioning carbon sink.
S95.4	Mangaroa Peat Overlay	Seek amendment	Zone the Mangaroa Peatland so that it is protected and able to be restored.	
S95.5	Mangaroa Peat Overlay	Seek amendment	Delay decision making on plan change 47 until after the Peatland is recognised as a	

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			significant natural area and/or a significant amenity landscape.	
Submitter 96: Sharlene McDonald				
S96.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S96.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S96.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			Mangaroa Peatlands and High slope zone as some risk.	accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S96.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S96.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S96.6	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
Submitter 97: Hamish McDonald				
S97.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a "horses for courses" approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available

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			may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S97.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S97.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
97.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It

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				also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S97.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S97.6	Slope Hazard Overlay	Oppose	Adopt either the Manaaki Whenua Land Use slope risk or the Manaaki Whenua Land Steepness overlay to define the area for development earthworks assessment or revisit the Lidar based information provided by Coffey. (Maps included in submission)	It is unclear how the PC47 high slope areas were identified. Out of at least four different slope risk maps UHCC should adopt the Manaaki Whenua Land Use database to reduce liability.
Submitter 98: Alan Rothwell				
S98.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.

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S98.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S98.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S98.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S98.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils	soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S98.6	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	<p>The property is poorly represented by the current proposed peatland overlay – the flatter part is in the overlay while the steeper part is outside.</p> <p>Initially entire property was shown as peat but was amended after site visit. Lower paddock is still shown as peat which seems wrong.</p> <p>Concerns regarding GRWC’s intention to establish buffer zones with no definitions of how large these zones may be.</p>
Submitter 99: Silver Stream Railway Incorporated				
S99.1	Slope Hazard Overlay	Seek amendment	<p>Please refer to the attached mark-ups of the slope hazard planning maps where SSR is seeking them to be amended by UHCC to reflect the actual land contours.</p> <p>(Maps included in full submission)</p>	<p>Significant areas of railway land for SSR which are broadly flat have been included in the slope hazard maps as 26 degree or greater slopes.</p> <p>Areas of stream bank are also included but should be removed because they are covered by setback requirements.</p> <p>The inclusion of these areas of SSR railway land within the proposed high slope hazard area overlay could adversely affect the assessment and ongoing future replacement of existing and future structures.</p>
Submitter 100: Nicola Rothwell				
S100.1	Mangaroa Peat Overlay	Seek amendment	PC47 to adopt a “horses for courses” approach that allows a pragmatic and risk-based approach to the processes for consenting for subdivision and building. That	Peat is just another soil type. The Building Act process requires that foundations on poor ground conditions must be designed by an engineer. While this is sufficient for new housing PC47 is required to ensure that viable building platforms are available

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			may mean a more streamlined approach for subdivisions for a single additional dwelling. In those cases, a single approach to an engineer is to be preferred to keep costs down.	before subdivision is consented. This approach may duplicate processes and increase the cost of subdivision and building. UHCC already requires the identification of building platforms as part of subdivision consents.
S100.2	Mangaroa Peat Overlay	Seek amendment	Change the names of the zones to something like “Sensitive land planning zone” for the Mangaroa Peatlands Hazard and “Slope assessment planning zone” or “Soil type Risk planning zone” for the High Slope Hazard zones.	RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. It is likely that rules will be applied to peat soils that are similar to rules applying to wetlands. Similar rules would significantly constrain land use for little environmental gain. Current peat maps do not provide details on height and depth of peat. RPS change 1 also mentions high slope areas. While UHCC aims to only use provisions and maps for new building or subdivision, GWRC may use the overlay to impose land use restrictions to depopulate areas like the Mangaroa Valley. The language should be changed to distance peatland and slopes from GWRC’s goals.
S100.3	General	Seek amendment	Have 3 categories for each hazard, No risk, some risk, and High risk. Classify the Wellington Fault Zone as high risk. Classify the Mangaroa Peatlands and High slope zone as some risk.	Introducing three risk levels (no risk, some risk, high risk) enables more stringent controls later, when more accurate hazard information is available. Slope and peatland should be categorised as some risk to manage new subdivision in accordance with PC47 and to remove it from RPS change 1 zones where development should be avoided.
S100.4	General	Seek amendment	Withdraw the cost benefit analysis and correct the mistaken facts and assumptions before re-publishing it.	The cost benefit analysis contains material mistakes which lead to risk assumptions that do not align with lived experience. It discounts the impact of hazard overlays on land values and insurability and the risk of regulatory misfeasance by GWRC. It

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				also over-estimates the risk to existing buildings and discounts the feasibility of engineering solutions.
S100.5	Mangaroa Peat Overlay	Seek amendment	Amend the map to be the peat defined in the Soil Bureau survey of the peatland and documented in this Overlay, as modified by the sites that have been ground truthed: ArcGIS - Mangaroa Valley Soils.	The boundaries of peatland are probably smaller than currently identified and should be based on an existing report called “Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand”. The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.
S100.6	Mangaroa Peat Overlay	Seek amendment	Please feel free to arrange to come and see my property.	<p>The property is poorly represented by the current proposed peatland overlay – the flatter part is in the overlay while the steeper part is outside.</p> <p>Initially entire property was shown as peat but was amended after site visit. Lower paddock is still shown as peat which seems wrong.</p> <p>Concerns regarding GRWC’s intention to establish buffer zones with no definitions or how large these zones may be.</p>
Submitter 101: Lisa Williams				
S101.1	Mangaroa Peat Overlay	Seek amendment	<ul style="list-style-type: none"> Ensure the Peat Overlay is accurate – especially where it overlays Lots with existing houses. Currently it is inaccurate and the ‘ground truthing’ carried out by Coffey excluded /misinterpreted some data. SUB-GEN-R3 to a Permitted Activity with a condition that a geotech report is submitted as part of the subdivision 	<p>UHCC has created a crude and inaccurate peat overlay polygon and defined it as a natural hazard. This process has created a lot of uncertainty and fear in residents.</p> <p>Requiring resource consent for subdivision in the peat overlay is unnecessary as this is already covered through existing subdivision and building consent pathways. Recent subdivision process achieved exactly the outcome sought by PC47.</p>

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
			consent process that confirms a suitable (buildable) building platform is identified within the new Lot.	
S101.2	Mangaroa Peat Overlay	Seek amendment	<ul style="list-style-type: none"> • Be consistent and accurate with Terms Used. • Change the Plan terminology from ‘Mangaroa Peat Overlay’ to ‘Soil Assessment Required Overlay’ to reflect the actual situation, which is that a specialist will need to assess the ground conditions. • Remove reference to ‘Poor ground conditions’ from planning documents as some of the land covered by the Peat Overlay is actually good solid ground. • Change the GIS Viewer name from ‘High Peat Risk’ to ‘Soil Assessment Required’. The current name incites unnecessary fear. 	<p>RPS change 1 proposes the protection and restoration of peat-based soils to prevent the release of any stored carbon. GWRC will use UHCC’s Peat Overlay Polygon to identify peat that requires protection. However current peat overlay is inaccurate and may incorrectly capture properties.</p> <p>Descriptions associated with the Peat Overlay are misleading.</p>
S101.3	General	Seek amendment	Update the cost benefit analysis and correct the mistaken facts and assumptions.	<p>Cost-benefit analysis discounts the impacts of the hazard overlays on people already living in the area in terms of</p> <ul style="list-style-type: none"> • Land value • Future insurability • Future land use restrictions imposed by GWRC

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
				<ul style="list-style-type: none"> Feasibility of engineering solutions to mitigate risk <p>Analysis over-estimates the risk of terrain to the safety of buildings already built</p>
S101.4	Mangaroa Peat Overlay	Seek amendment	Update the overlay so it is accurate. Review the 'ground truth' data collected near 110 KMD and update the maps accordingly.	<p>Despite engagement with UHCC, the boundaries of the peatland are still inaccurate. Overlay should identify 'transition zones' to show where the peat might be layered with other soils.</p> <p>Boundaries should be based on an existing report called "Soils of Mangaroa-Whitemans Valley, Upper Hutt, New Zealand". The soil type of Golans Clay with peat should be excluded from the peat hazard overlay.</p>
Submitter 102: Mary Beth Taylor				
S102.1	NH-O1 – Risk from Natural Hazards	Oppose	Recognise that building development is completely inappropriate on the Mangaroa Peatland.	<p>Mangaroa Peatland provisions are not supported for the following reasons:</p> <ul style="list-style-type: none"> The Mangaroa Peatland is a draft SNA and should be protected from development. The NPS-FW requires the protection and restoration of natural inland wetlands. The peatland is a damaged carbon sink that should be protected and restored. The peatland has never been assessed and geo-technically mapped to determine its depth.
S102.2	NH-P1 – Identification of Natural Hazards		Zone the Mangaroa Peatland so that it is protected and able to be restored.	
S102.3	NH-P2 – Least Hazard Sensitive Activities within the Mangaroa Peat Overlay, High Slope Hazard Overlay and		Delay decision making on plan change 47 until after the Peatland is recognised as a significant natural area and/or a significant amenity landscape.	
S102.4			Delay further work on the peatland portion of PC47 until a thorough assessment has been made of the hydrology, geology, flora, fauna	

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
	Wellington Fault Overlay		of the peatland. Include an assessment of carbon currently being released.	<ul style="list-style-type: none"> The draft NPS-IB indicates protection and restoration of wetlands and peatlands. The risk from development of the peatland is too great especially for the environment.
S102.5	NH-P5– Hazard Sensitive and Potentially Hazard Sensitive Activities within the Mangaroa Peat Overlay.		Delay further work on the peatland portion of PC47 until the draft NPS IB has been finalised and is operative.	
Submitter 103: Tony Chad				
S103.1	NH-O1 – Risk from Natural Hazards	Oppose	Recognise that building development is completely inappropriate on the Mangaroa Peatland.	<p>Mangaroa Peatland provisions are not supported for the following reasons:</p> <ul style="list-style-type: none"> The Mangaroa Peatland is a draft SNA and should be protected from development. The NPS-FW requires the protection and restoration of natural inland wetlands. The peatland is a damaged carbon sink that should be protected and restored. The peatland has never been assessed and geo-technically mapped to determine its depth. The draft NPS-IB indicates protection and restoration of wetlands and peatlands. The risk from development of the peatland is too great especially for the environment.
S103.2	NH-P1 – Identification of Natural Hazards		Zone the Mangaroa Peatland so that it is protected and able to be restored.	
S103.3	NH-P2 – Least Hazard Sensitive Activities within the Mangaroa Peat Overlay,		Delay decision making on plan change 47 until after the Peatland is recognised as a significant natural area and/or a significant amenity landscape.	
S103.4	High Slope Hazard Overlay and Wellington Fault Overlay		Delay further work on the peatland portion of PC47 until a thorough assessment has been made of the hydrology, geology, flora, fauna of the peatland. Include an assessment of carbon currently being released. This assessment should be carried out by an	

Sub. Point	Provision	Support/Oppose/ Seek amendment	Decision Sought	Reasons
	NH-P5– Hazard Sensitive and Potentially Hazard Sensitive Activities within the Mangaroa Peat Overlay.		expert in this field, with the expectation and requirement that the most accurate and beneficial environmental assessment be made. Note that this is the best result for the environment, not the best result for a developer seeking to sidestep development constraints. To draw a parallel situation, the best environmental assessment would not be achieved by an ecologist taking a walk through the Peatland and using binoculars instead of seeing and exploring things first hand.	
S103.5			The Mangaroa Peatland is a regional treasure. It is unique in the lower North Island. The Mangaroa Peatland incorporates a significant natural area. The Section 32 report should acknowledge this.	
S103.6			If the above assessment confirms the Mangaroa Peatland to be of regional or national significance, then a high-level plan needs to be developed for appropriate restoration in tandem with protecting existing dwellings on its boundaries.	
S103.7			Delay further work on the peatland portion of PC47 until the draft NPSIB has been finalised and is operative.	

List of Submitters with Address for Service

Sub No.	Submitter name	Address for service
1	Sonia and Steve Morgan	172 Plateau Road, Te Marua, Upper Hutt 5018
2	Ronald Hunter	19 Vernon Grove, Brown Owl, Upper Hutt 5018
3	Amit Kakroo	52 Crest Road, RD2, Upper Hutt 5372
4	Cheryl Gall	215a Katherine Mansfield Drive, Whitemans Valley, Upper Hutt 5371
5	V & J Manley	29b Roband Crescent, Brown Owl, Upper Hutt 5018
6	Gaylene Ward	2057 Akatarawa Road, RD2, Upper Hutt 5372
7	Charisa Lockley	205 Plateau Road, Te Marua, Upper Hutt 5018
8	Stephen Taylor	31 Seymour Grove, Kingsley Heights, Upper Hutt 5018
9	David John Angus	18 Amber Grove, Birchville, Upper Hutt 5018
10	Paul Atkins	63A Sierra Way, RD1, Upper Hutt 5371
11	Steven Fargher	10A Pinehaven Road, Pinehaven, Upper Hutt 5019
12	Alec Hobson	29 Aragon Grove, Kingsley Heights, Upper Hutt 5018
13	Jo Greenman	Baring Head Lighthouse Complex, Wainuiomata Coast
14	Camilla Jane Watson	33 Kenneth Gillies Way, RD2, Upper Hutt 5372
15	David Chrystall	150 Colletts Road, RD1, Upper Hutt 5371
16	Eric Cairns	178 Mangaroa Valley Road, RD1, Upper Hutt 5371
17	Steve Rich	271C Wallaceville Road, RD1, Upper Hutt 5371
18	Lance Burgess	1144C Maymorn Road, Maymorn, Upper Hutt 5018
19	David Beachen	1029C Akatarawa Road, Akatarawa, Upper Hutt 5372
20	Simon Wall	103 Pinehaven Road, Pinehaven, Upper Hutt 5019
21	Judi Huxedurp	20 Sylvan Way, Silverstream, Upper Hutt 5019
22	Rozalie Brown	71 Plateau Road, Te Marua, Upper Hutt 5018
23	Brenda Stonestreet	40 Sylvan Way, Silverstream, Upper Hutt 5019
24	Aldis Malskaitis	9 Cory Jane Grove, Riverstone Terraces, Upper Hutt 5018
25	Mark Murrell	216 Mangaroa Valley Road, RD1, Upper Hutt 5371
26	Teresa Homan	5 Elm Street, Ebdentown, Upper Hutt 5018

Sub No.	Submitter name	Address for service
27	Karsten Kroeger	17 Avian Crescent, Blue Mountains, Upper Hutt 5371
28	Donna Tofts	31B Karapoti Road, RD2, Upper Hutt 5372
29	Stephen Shand	231 Mangaroa Valley Road, Mangaroa, Upper Hutt 5371
30	Wayne Edgerley	2 Tiniroa Grove, Silverstream, Upper Hutt 5019
31	Rosemary Anne Paddison	86C Kaitoke Loop Road, Kaitoke, Upper Hutt 5018
32	Robert Bok	536 Main Road North, Timberlea, Upper Hutt 5018
33	Allan Kelly	1368 Akatarawa Road, RD2, Upper Hutt 5372
34	Karen Pugh	30 Glide Lane, Whitby, Porirua 5024
35	WREMO - Jeremy Holmes	PO Box 11646, Manners Street, Wellington 6142
36	Daniel Buhler	C/- planning@uhcc.govt.nz
37	Doug Gillanders	1144 Maymorn Road, Maymorn, Upper Hutt 5018
38	Melanie Smith	C/- planning@uhcc.govt.nz
39	Quinn McCarthy	70 Blue Mountains Road, Pinehaven, Upper Hutt 5019
40	Dr Boyd Blake and Mrs Verna Blake	27 Sylvan Way, Silverstream, Upper Hutt 5019
41	Yannick M Quesnel and Sherilyn A Quesnel	23 Sylvan Way, Silverstream, Upper Hutt 5019
42	Dr Amarjeet Kanwell and Ripudaman Kanwal	29 Sylvan Way, Silverstream, Upper Hutt 5019
43	Robert Anker	76 Katherine Mansfield Drive, RD1, Upper Hutt 5371
44	Malcom Ayers	10A Garrett Place, Riverstone Terraces, Upper Hutt 5018
45	Bruce Ridley	230 Katherine Mansfield Drive, RD1, Upper Hutt 5371
46	Grant Boyd	13 Emerald Hill Drive, Birchville, Upper Hutt 5018
47	David De Martin	45A Kirton Drive, Riverstone Terraces, Upper Hutt 5018
48	Dean and Debbie Molony	60 Kirton Drive, Riverstone Terraces, Upper Hutt 5018
49	Nathan James Gardiner	91 Gillespies Road, Birchville, Upper Hutt 5018
50	Paul Harris	104 and 99 Bulls Run Road, Moonshine Valley, Upper Hutt 5381
51	M de Jong	9 Plantagenet Grove, Kingsley Heights, Upper Hutt 5018
52	Greater Wellington Regional Council	PO Box 11646, Manners Street, Wellington 6142
53	Kevin Trotter	PO Box 40274, Upper Hutt 5140

Sub No.	Submitter name	Address for service
54	D Johnson	11 Ronald Scott Grove, Riverstone Terraces, Upper Hutt 5018
55	Katelyn King	148 Kakariki Way, Whitemans Valley, Upper Hutt 5371
56	Elena Goff	31 Aragon Grove, Kingsley Heights, Upper Hutt 5018
57	Christine Lehmann	80D Gilbert Road, Kaitoke, Upper Hutt 5018
58	Jeff Price	54 Mount Marua Drive, Timberlea, Upper Hutt 5018
59	John and Lynne Hill	198a Katherine Mansfield Drive, RD1, Upper Hut 5371
60	Weston Hill	198a Katherine Mansfield Drive, RD1, Upper Hut 5371
61	Mark Robbins	1291 Akatarawa Road, RD2, Upper Hutt 5372
62	Anna Brodie and Mark Leckie	9 Ashton Warner Way, RD1, Upper Hutt 5371
63	Gregor and Stephanie Kempt	3 Ashton Warner Way, RD1, Upper Hutt 5371
64	Richard and Carol Dormer	156 Katherine Mansfield Drive, RD1, Upper Hutt 5371
65	Gavin Burgess	8b Garnett Place, Riverstone Terraces, Upper Hutt 5018
66	Judith and Sandy Kauika-Stevens	4 Margaret Mahy Drive, RD1, Upper Hutt 5371
67	Philip Clegg	5 Margaret Mahy Drive, RD1, Upper Hutt 5371
68	Jeff and Noeline Berkett	1 Whitemans Valley Road, RD1, Upper Hutt 5371
69	Nicole and Dave Tyson	16 Ashton Warner Way, RD1, Upper Hutt 5371
70	Roger O'Brien	110 Katherine Mansfield Drive, RD1, Upper Hutt 5371
71	Paul Dyson	74a Katherine Mansfield Drive, RD1, Upper Hutt 5371
72	Mike Philpott	4 Morepork Close, Brown Owl, Upper Hutt 5018
73	Paul Dansted and Sarah Kerkin	79 Hill Road, Belmont, Lower Hutt 5010
74	Paul Lunn	5 Valley View Way, Timberlea, Upper Hutt 5018
75	Adam Pawlak	1195 Omanawa Road, RD1, Tauranga 3171
76	Heather McKay	198c Katherine Mansfield Drive, RD1, Upper Hutt 5371
77	Colin Hawes	198c Katherine Mansfield Drive, RD1, Upper Hutt 5371
78	Steven Robertson	6a Chatsworth Road, Silverstream, Upper Hutt 5019
79	Heather Blissett	C/- 2 Gybe Place, Whitby, Porirua 5024
80	Scott and Nicola Whitman	9 Margaret Mahy Drive, RD1, Upper Hutt 5371

Sub No.	Submitter name	Address for service
81	Karen Leishman and Christopher Griffin	36 Akatarawa Road, Brown Owl, Upper Hutt 5018
82	Ministry of Education	PO Box 3942, Wellington 6140
83	Gerald Keown	50d Katherine Mansfield Drive, RD1, Upper Hutt 5371
84	Wendy Botha	114 Mangaroa Valley Road, RD1, Upper Hutt 5371
85	Jemma and AJ Ragg	7 Margaret Mahy Drive, RD1, Upper Hutt 5371
86	Evie Gray	66 Wyndham Road, Pinehaven, Upper Hutt 5019
87	Andrea Follett	74a Katherine Mansfield Drive, RD1, Upper Hutt 5371
88	Grant O'Brien	102 Katherine Mansfield Drive, RD1, Upper Hutt 5371
89	Kerry Ryan	96 Katherine Mansfield Drive, RD1, Upper Hutt 5371
90	Lisa Keown	50d Katherine Mansfield Drive, RD1, Upper Hutt 5371
91	Grant and Melanie Avery	3 Valley View, Timberlea, Upper Hutt 5018
92	Chris and Jen Priest	74 Katherine Mansfield Drive, RD1, Upper Hutt 5371
93	Emma Zee	47 Seymour Grove, Kingsley Heights, Upper Hutt 5018
94	Cushla and Vaughan Majendie	159 Katherine Mansfield Drive, RD1, Upper Hutt 5371
95	Pat van Berkel	95 Elmslie Road, Pinehaven, Upper Hutt 5019
96	Sharlene McDonald	88 Katherine Mansfield Drive, RD1, Upper Hutt 5371
97	Hamish McDonald	88 Katherine Mansfield Drive, RD1, Upper Hutt 5371
98	Alan Rothwell	50a Katherine Mansfield Drive, RD1, Upper Hutt 5371
99	Silver Stream Railway Incorporated	Reynolds Bach Drive, Stokes Valley, Lower Hutt 5019
100	Nicola Rothwell	50a Katherine Mansfield Drive, RD1, Upper Hutt 5371
101	Lisa Williams	110 Katherine Mansfield Drive, RD1, Upper Hutt 5371
102	Mary Beth Taylor	165a Katherine Mansfield Drive, RD1, Upper Hutt 5371
103	Tony Chad	165a Katherine Mansfield Drive, RD1, Upper Hutt 5371