

RMA FORM 5

porirua city

## Submission on publicly notified Proposed Porirua District Plan

Clause 6 of the First Schedule, Resource Management Act 1991

To: Porirua City Council

1. Submitter details:

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2. This is a **submission** on the **Proposed District Plan** for Porirua.

3. I could  I could not   
gain an advantage in trade competition through this submission.  
(Please tick relevant box)

If **you could** gain an advantage in trade competition through this submission please complete point four below:

4. I am  I am not   
directly affected by an effect of the subject matter of the submission that:  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.  
(Please tick relevant box if applicable)

Note:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

5. I wish  I do not wish   
To be heard in support of my submission  
(Please tick relevant box)
6. I will  I will not   
Consider presenting a joint case with other submitters, who make a similar submission, at a hearing.  
(Please tick relevant box)

Please complete section below (insert additional boxes per provision you are submitting on):

The specific provision of the proposal that my submission relates to:
<p>Submission the Proposed District Plan – Kevin Gwynn Nov 2020</p> <p>I am submitting on three areas:</p> <ol style="list-style-type: none"> <li>1. The Proposed FUZ for Judgeford Flats</li> <li>2. The PDP section related to Noise in particular noise from traffic</li> <li>3. The quarrying rules as allowed for in the Rural Zone.</li> </ol> <p>Response to Proposed District Plan (PDP) Future Urban Zone (FUZ) in Judgeford Flats.</p> <p>I object entirely to the Judgeford Flats FUZ zone and propose the Judgeford flats turns into Rural Lifestyle zoning as proposed in the Judgeford Strategic plan.</p> <p>The reasons I object are listed below and in more details further on:-</p> <ul style="list-style-type: none"> <li>• It will significantly ruin the ambience of this area</li> <li>• It is a large flood plain and development will ruin the Pauatahanui river, cause flooding upstream and downstream due to Wetlands and flood plain developments</li> <li>• Development in this area will cause further siltation and damage to the Inlet.</li> <li>• The area is not a greenfield, has many small plots of land in many different owners and many dwelling units that would be impacted. It will therefore not be attractive to developers and therefore will become a white elephant.</li> <li>• The Large-scale space required is not achievable in this space.</li> <li>• SH58 is not and will not be suitable to add more intersections at this location.</li> <li>• There are better places IF this type of space is required that were not considered.</li> <li>• It has complexities to development including a Major Earthquake Faultline, rivers/streams to cross, some steeper land not suitable for development, National Grid corridor, difficulty to get services connected.</li> <li>• Development will ruin the ecosystem Trout, Eel and bird habitats and truncate a ecological connection between the Pauatahanui Inlet and the Hills connecting it to the Hutt city and beyond.</li> </ul> <p>These reasons are explained in further detail below.</p>

### FUZ Name and Purpose

The FUZ proposed on Judgeford flats is out of character with the other FUZ zones proposed in the DP when the details are read which describes it as an Industrial site rather than a Housing site (like the others FUZ areas are). To Quote the PDP "Judgeford Flats is identified as being needed and suitable for industrial use".

Also, Section 32 report states:

CEI-08 Future Industrial Zone

The Judgeford Flats area of the Future Urban Zone will help meet the City's identified medium to **long-term industrial land use needs**.

Council are being disingenuous by calling it "Future URBAN Zone" when it is clearly intended to be a satellite INDUSTRIAL area for Porirua. Therefore, it should be called "Future Industrial Zone" **FIZ** and zoned as such rather than trying to fool anyone that it helps also addresses a housing crisis.

### Industrial Land requirements

The Judgeford land has been proposed as an Industrial zone with several purposes mentioned across numerous studies and reports. Some of these are listed below:-

1. To provide improved GDP for Porirua and places of employment
2. To provide large sections for Warehouse and logistics centre
3. To provide land for an Industrial park.

Firstly, I fully support and understand the need to increase jobs and work opportunities in the city and increase the city's GDP.

I believe that providing large sections will not achieve this and will not increase GDP for the city. If large sections are available, it is probable that large overseas companies will use it to place a large, automated Warehouse employing very few people but creating a high volume of noisy heavy vehicles to/from it. I don't believe Porirua should become a Warehouse dump for large overseas companies at little benefit to the City.

If the intent is to make a large Industrial park, the argument that the proximity to the TGM interchange becomes significantly less important given that it requires more people to/from and therefore Public transport links and connection to the city centre are more important. In this case, an area on the proposed Plimmerton Farm development would make more sense given that it would be easier to add a train station closeby to service it, it already has bike paths, the current SH1 will reduce in traffic, not increase like SH58, and has better connection to the City and housing than a satellite at Judgeford.

Regarding an increase in GDP for the city, it is positive that the Proposed District plan FUZ- R10 Legitimises and encourages home based businesses by allowing up to 100m2 of office/homebased business area per home and one offsite employee. The Covid19 Pandemic has shown that distributed businesses especially home based are more resilient in time of a Pandemic but also in times of natural disasters e.g. earthquakes/flooding etc.

In the Pauatahanui and Judgeford area there are many home office businesses. Encouraging home-based businesses does, and will, increase Porirua's GDP. Adding higher tech jobs has historically proven to be a positive step towards improving GDP of a region. These jobs typically require office space (which often can be home based) rather than requiring specific Industrial parks. Testimony to that are the many currently empty ghost like Industrial parks in California due to the Pandemic and workers choosing to/having to work from home.

### Greenfields

The Introduction of the PCC Section 32 Evaluation Report, Part2: Future Urban Zone states: "This section 32 evaluation report focusses on greenfield areas of the District that have been identified as being suitable for future urban development, known as the Future Urban Zone (FUZ)."

And the Martin Jenkins report on such states: *Given the strength of demand and constraints on supply across the Wellington region, the Council should seek to future proof the Porirua economy by allocating additional greenfield sites for industrial uses in locations that are close to transport interchanges to support the ongoing growth and attraction of industrial employers.*

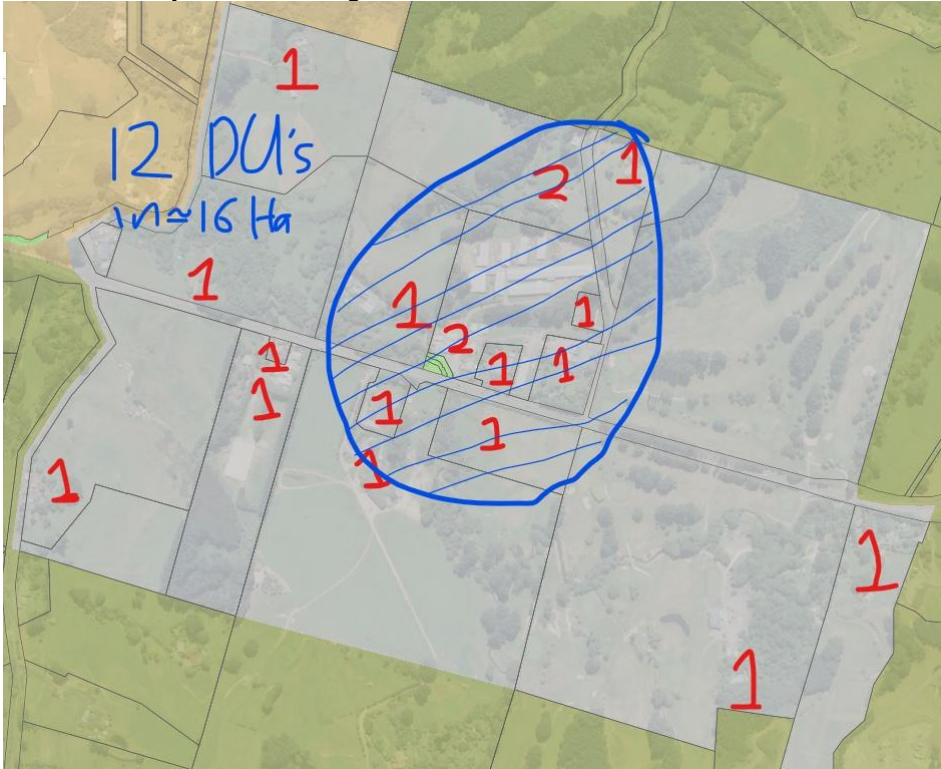
And further P41 states

*Judgeford has potential, at scale. The arterial access of this location has appeal, particularly for **distribution sector**. However, this will need to be at sufficient scale (**10 hectare minimum**) that attracts the associated support industries that are already well established in the Southern Hutt.*

From the Diagram below, it obvious that the area chosen is **NOT** a Greenfield and finding a usable 10Ha

space would prove difficult outside of the Golf Course.

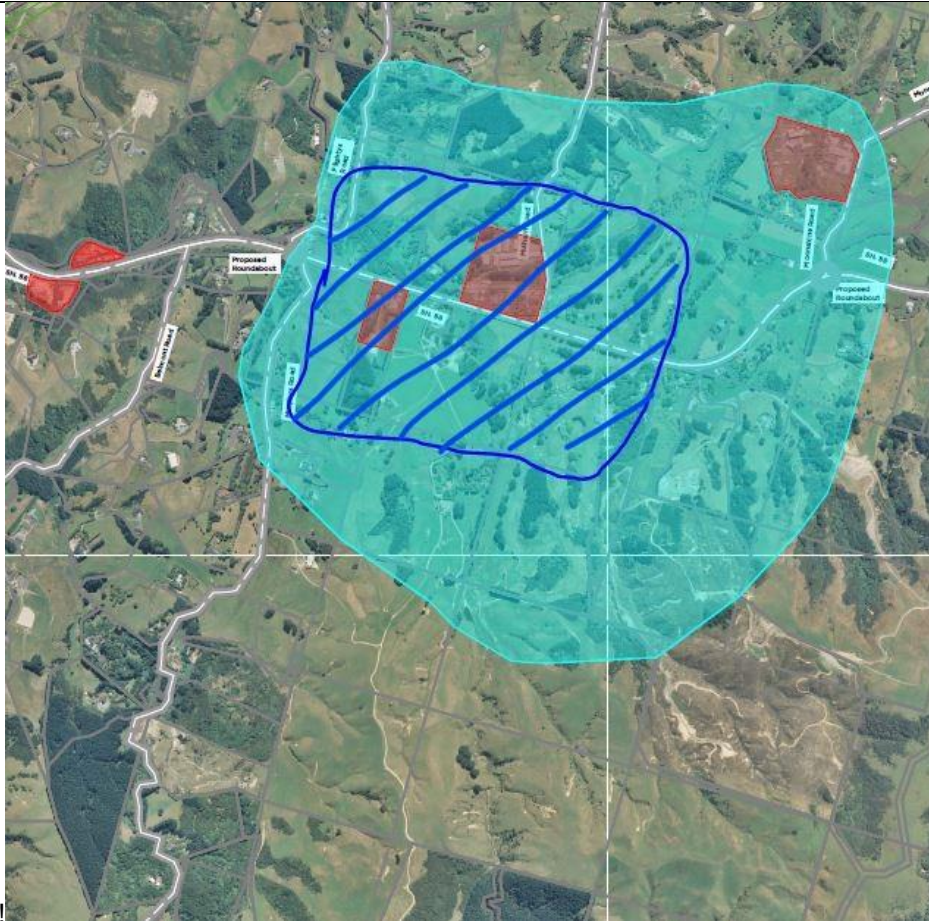
The diagram shows that in the area circled within the Judgeford Flats FUZ there are 12 Dwelling Units(DU) in approx. 16 Hectares. Of that space, an historical Industrial yard (Shedlands) occupies around 4Ha. Thus, in the remaining 12 Ha's are 12 DU's or 1 per Ha spread amongst 10 different property owners!!! It is completely unrealistic to expect that 10Ha would become available the objectives of the FUZ will be achieved from a land availability and ownership perspective – ignoring other constraints mentioned blow like Flooding, Transmission corridors etc. If the intent is for Council to include Shedlands as an Industrial site, this should be done through a normal consent process rather than trying to shoe-horn a District plan around it that doesn't fit well and as discussed below would have serious ramifications long term to the City and to this region.



It is also completely unrealistic that a potential Developer would be able to convince multiple landowners to sell in unison such that it is worth their efforts before they invest in the required infrastructure to support an Industrial FUZ.

It seems strange that the Judgeford Flats (with all its issues that make it problematic for development of this type) was selected when the Landmatters' report had a wider area which included some more suitable spaces as shown below. Green highlights Landmatters' area for study, the Blue hatch area shows PCC





chosen space!

### Judgeford Structural Plan (JSP)

The Judgeford Structural plan has been developed over many years with a lot of community and expert involvement. Transmission Gully (TGM) was imminent during this process as was the position of SH58 in relation to it.

Extensive investment by the Council and Community into the Judgeford Structural was made in the past with a report in Nov 2012 which was intended to be the guiding document for activities towards updating the District plan. Through many years of excellent work, it was concluded (amongst other things) that the lower land in Judgeford was ripe for further lifestyle subdivision (down to 2Ha ave.) while the steeper erosion prone lands were more suitable for less intensification (4Ha ave.) in order to help protect the Inlet from further siltation. The lower slopes were therefore crucial in providing more house supply to the city to ensure a range of different housing and property types were available to give a balance within the city. The Draft Wellington Regional Growth Framework, (WRGF) forecasts up to 151,000 more residents will make up the region and a large number are expected to settle between Tauwharua and north Wellington. The plan also identifies potential west-east corridors to open up for residential land including between Porirua and Heretaunga. Judgeford sits in a prime position to capture this area for providing a small amount of housing intensification by changing the zoning to Rural Lifestyle. It is important as a city that a reasonable number of housing types and differ section types are available to meet the needs of those that wish to reside in Porirua. It is also noted that the key concern of the WRGF was towards a serious and long term housing shortage rather than large warehouse sites.

Form the Judgeford Structural plan

Judgeford Pāuatahanui Structure Plan &  
 Technical Report  
 (November 2012)

This Pauatahanui-Judgeford Structure Plan was a set of initiatives developed in 2012 to guide the future development of this area. **It provided for further intensification of rural subdivision subject to revegetation of the catchment and design controls on development to reduce sedimentation into the Inlet.**

**The Structure Plan also recommended further investigations into the potential for a Logistics hub in the area** (a logistics hub was described as a cluster of transport, logistics and distribution enterprises on a site). It recommended exploring the suitability of sites within the study area for this purpose with the Greater Wellington Regional Council, City Council and landowners.

The Structure Plan also highlighted the strategic location of the area following completion of Transmission Gully, further strengthening its suitability as a logistics hub.

**It noted that the advantages of a Logistic Hub are mainly regional, while the disadvantages are mainly local.** Further market analysis was recommended to determine the demand and feasibility for such a centre.

It is also noted that the Proposed District plan has allocated Extreme steep erosion prone land along the Western side of the Akatarawas to be zoned Lifestyle with potential subdivision down to 2Ha. **This land of Paekakariki road is not suitable for supporting this level of density and should be zoned Rural rather than Rural lifestyle.**

Further, the area around the Moonshine/SH58 intersection was identified as a potential Industrial development site given the proximity to TGM. The SH58 improvements also mean there will be a large roundabout entry onto SH58 in this position.

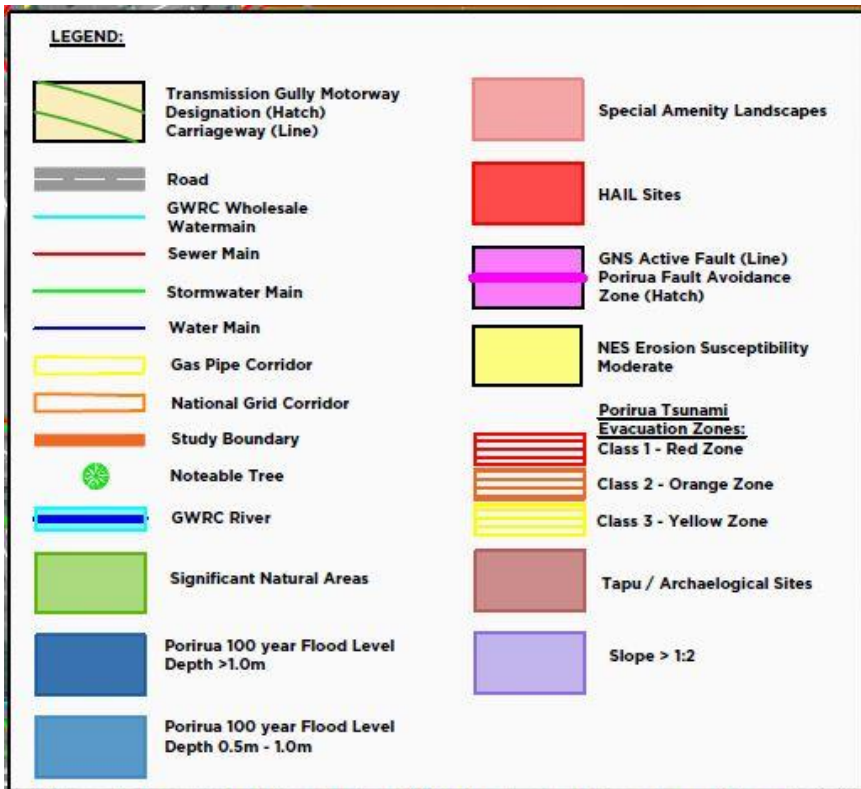
The Landmatters' report seems to exclude what appears to be prime land for an Industrial development with large sites, should it be required. This would also fit better with the findings of the JSP and the already reasonable number of workers in this location who would benefit from adding services that supported both public transport and food provision.

The land indicated below is

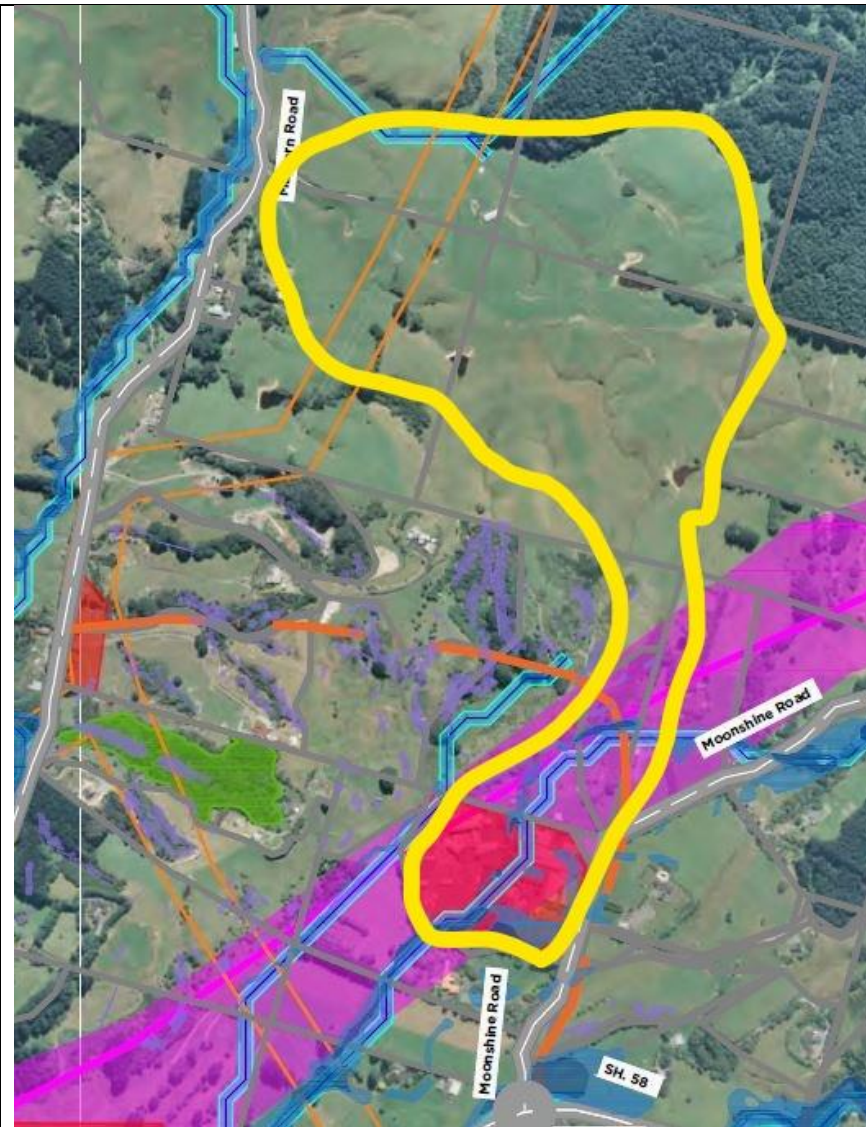
1. Essentially a greenfield
2. Is distanced both audibly and visibly from most Dwelling Units and main through traffic thereby avoiding impact on the amenity value as would be experienced in the Judgeford Flats scenario.
3. Is mostly large properties with a low number of owners,
4. Has virtually no Dwelling Units
5. Includes an already large Industrial site with a high number of employees (BRANZ)
6. Has Regional water supply and has some support for sewerage which may benefit from being upgraded should there be more demand from new business.
7. Is of gentle to rolling gradient,
8. Does not have flooding or ponding issues,
9. Is close to what will be a well formed intersection,
10. Has less land located on an Earthquake fault line
11. Has only a small portion in a National Transmission Grid area
12. Does not have any SNA areas within it.
13. Allows a larger than required area therefore more flexibility and less constraints in the space that can be used.

Note in the drawing below has been extracted from the Landmatters' report. It shows where Study Boundary was arbitrarily (and in my view prematurely) created. The Yellow line encompasses an potential area which appears more highly suited for an Industrial park.

Legend for drawing below



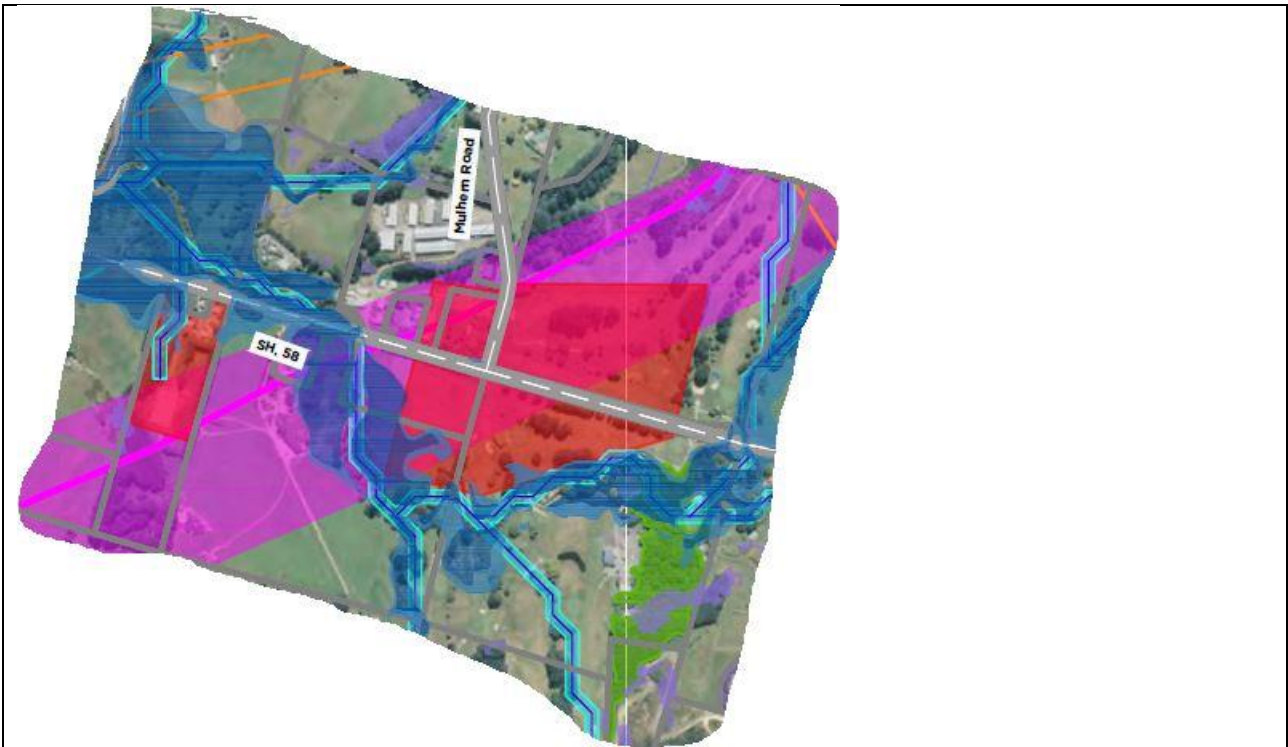




### Floodplain and Ponding

A large portion (around 30%) of the Judgeford flats where the FUZ is currently indicated is susceptible to flooding as shown in the Landmatters' report. The picture below extracted from the Landmatters' report, shows the floodplains (dark Blue) over the indicated FUZ area. This area provides a 'Large Volume Ponding' area such that Upstream and Downstream water pressure is reduced and therefore erosion, flooding and damage is reduced.

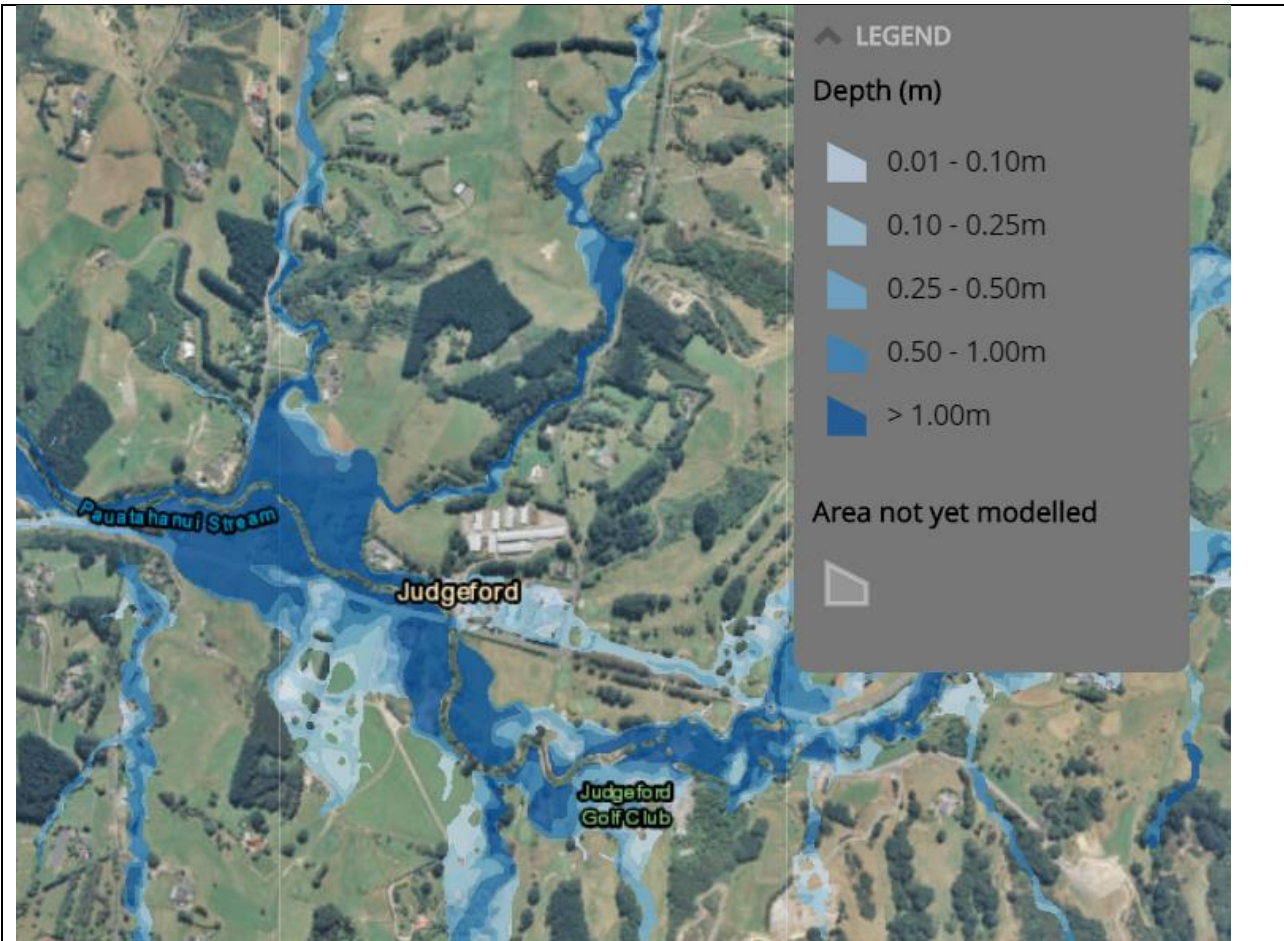




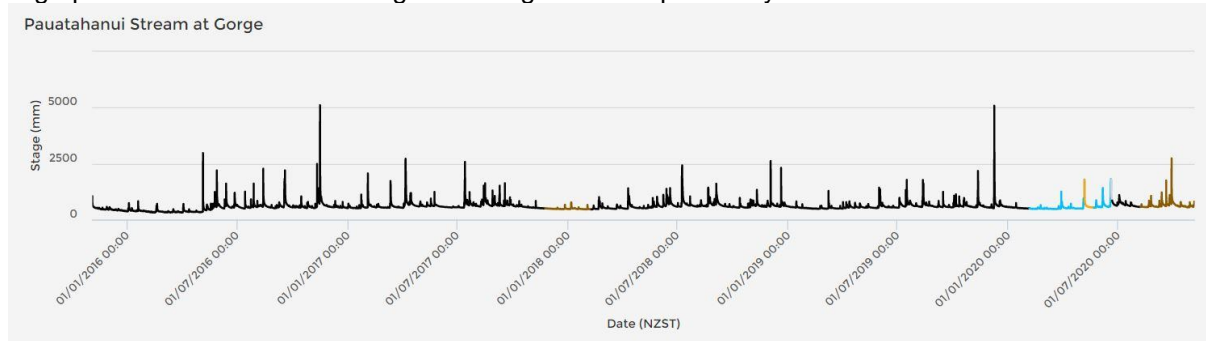
This matches well with GWRC flood modelling seen below which shows areas of flooding to a depth of more than 1metre.

Conservative estimates of the area within the FUZ that flood over 1m deep is around 25Ha. Should this area be developed it would relate to, conservatively, 250,000 cubic metres of water that can no longer pond thereby resulting in more extreme peak river flows downstream and severe flooding upstream – see pictures below.





A graph of Peak flows at the Judgeford Gorge over the past ten years is shown below.



From this it can be seen that even with the ponding on the Judgeford Flats, there are two events of over 5m peak flow and ten events (ave. one per year) over 2m peak flow height. If the Judgeford flats were to be developed, the lack of ponding capability would put incredible pressure on properties both down stream and upstream such that property damage would increase, more river bank erosion would occur and hence our precious Pauatahanui Inlet would be further choked with Silt deposits.

Further, the 100yr flood plain data suggest over 1m of ponding across this area. From past experience, it is clear that developments of this magnitude on a flood plain this size WILL cause siltation and sediment to be lodged into the Inlet and cause further degradation. Clearly this should be avoided.

The RMA Section 6 states as listed in the Section32 report

Section 6(h)

The management of significant risks from natural hazards.

**Both the NGA and Judgeford Flats areas have identified flood risk, and any future development of these areas will need to avoid, remedy or mitigate the risk of flooding in these areas,**

To achieve the objectives of the FUZ in the Judgeford area, the flood plains would have to be developed. If this area is developed, there is no possible way that the positive effects that this area has on reducing

peak water flows in the Pauatahanui River can be managed and therefore Section 6h can not be achieved.

Section 32 report states:

NE-03 Preventing further degradation of Te Awarua-O-Porirua Harbour

Subdivision, **use and development does not contribute to any further degradation of Te Awarua-o-Porirua Harbour and its catchment.**

And

NE-04 Health and wellbeing of Te Awarua-O-Porirua Harbour

The health and wellbeing of Te Awarua-O-Porirua Harbour is **maintained and protected and, where possible, enhanced.**

The Three waters report states *“It also requires hydraulic neutrality<sup>4</sup> for new developments”* with the note below *“Means the principle of managing stormwater runoff from all new lots or development areas through either on-site disposal or storage, **where any stormwater that is released beyond the site is at a rate that does not exceed the pre-development peak stormwater runoff**”*.

This suggest that there should be no increase in the rate at which water runs off the existing land than at present and would therefore exclude any development in the ponding area described above.

### Wetlands

NZTA currently own 237 Paremata Haywards Road i.e. the land that borders on Flighties Road and SH58. They have deemed parts of this land to be Wetlands!

Wetlands are in serious decline across New Zealand and development of this land into a space suitable for Industrial businesses, would be determinantal to the Fish life, bird life and ecology of the region.

### Amenity Value

Many lifestyle owners in the FUZ and Surrounds move to the Judgeford area because of the Amenity value, more space to enjoy the open surrounds, the quiet, the environment and ecology, the Bird song etc. A proposal like the Judgeford Industrial FUZ will significantly ruin this for many property owners within and slightly beyond the area defined.

The Section32 report states:

FC-03 Existing activities

**The ongoing operation, character and amenity values of existing activities are protected from incompatible subdivision, use and development .**

And

NE-01 Natural character, landscapes and features and ecosystems

**The natural character, landscapes and features character and identity** and ecosystems that contribute to Porirua’s and Ngāti Toa Rangatira’s cultural and spiritual values are recognised and protected.

A popular PCC slogan is “Keep Porirua Beautiful”. SH58 currently provides the traveller with beautiful countryside views. The Judgeford Structural plan also promotes a pathway alongside the Pauatahanui Stream for people to safely bike/walk int his space and enjoy the scenery alongside the beautiful Pauatahanui stream. Whilst this path may be some time to fruition, it is a Vision which enhances the City and the lifestyle and wellbeing of its residents.

Further, the Judgeford Golf course which would be destroyed in this FUZ proposal, is the only 18 hole golf course in Porirua and has a good reputation for a quality destination. Once facilities like these disappear, there is no chance of them returning or being created elsewhere in the City due to high land prices. This would be a huge loss to the city and to this location and another 18 hole Golfcourse in the city destroyed by so called “Progress”.

Industrial sites around Porirua including mixed light industry/residential sites around Porirua suggest that if the FUZ was developed as and where suggested, the beautiful nature of the area would change to become an ugly thoroughfare.



The question is: Are we prepared to sacrifice this and our some of our more beautiful parts of the city to become a Warehouse or Industrial Industry dumping ground turning the place into an ugly, noisy space with a high level of truck movements that does nothing to inspire people to move into this City and certainly doesn't leave them saying "Beautiful Porirua"?



From this to this to ?????

Pictures taken on the boundary of a current Industrial site within the proposed FUZ zone!



Picture taken of current Industrial site along SH58 showing containers, a truck yard and all sorts of other untidy Engineering equipment.



## Ecology

The Pauatahanui Stream provides a strategic Bird corridor to/from the Pauatahanui stream to the hills bordering on Hutt City and beyond. The fish life in this stream and its tributaries are significant breeding and maturing grounds for many species that provide a crucial habitat connected to the Pauatahanui Inlet. As mentioned above, if this development proceeds, it is likely that there will be large disturbances to the natural river flows and flood plains that make up this proposed FUZ area and there is a high risk that bisecting the Pauatahanui River with a development like this within the flood plain, and across it, will cause irreversible and permanent damage to the ecology.

Special areas within the Proposed FUZ like this waterfall below are likely to be lost or ruined and the ecology damaged. This is just one example within the proposed FUZ area that has no SNA designation on it yet is clearly a special piece of the city and ecology that must be protected. It is also worth noting that the pond below this waterfall is resident to native Trout (seen up to 350mm long), Eels and freshwater mussels have also been found.

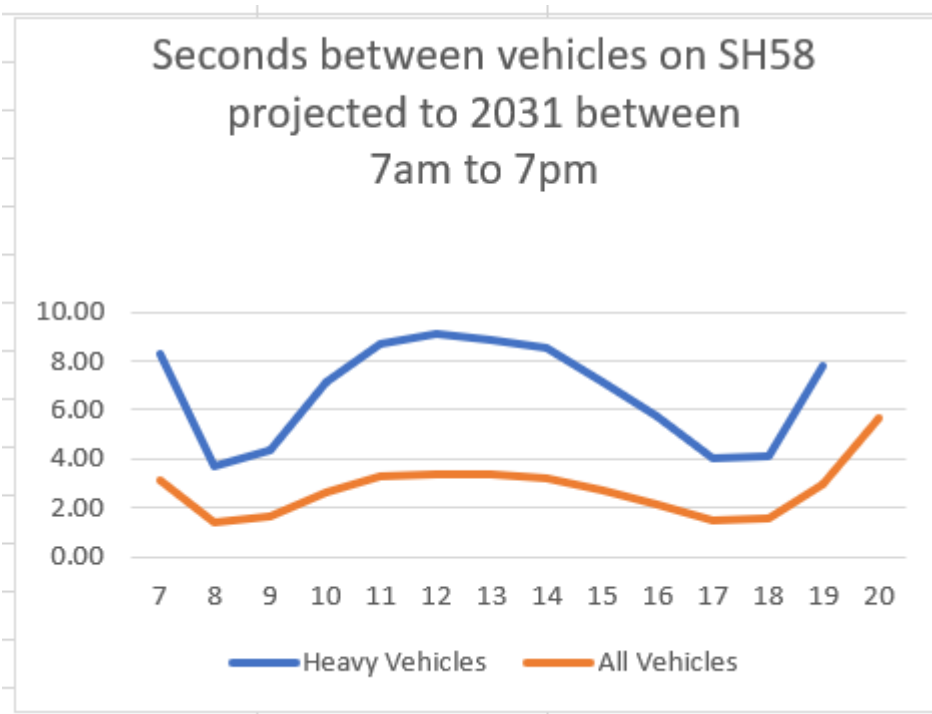


## Transport

SH58 in 2031 is projected by NZTA to have 23000 vehicles per day (VPD) on it of which 3450 are

projected to be Heavy Vehicles (HVPD). The current Porirua District plan section H3 classifies SH58 as a "Major Arterial road Traffic volumes are typically 7,000-15,000 v.p.d. for Minor arterials while Major implies planning for four lanes and volumes typically 10,000 - 25,000 v.p.d.". SH58 improvements planned in this area do not allow for two lanes each way – therefore the 10,000 to 15,000vpd should be used as a limit. Note: the current level of VPD is around 17500 and TGM opening will add at least 15% - with a significant increase in Heavy Vehicles from around 500 HVPD to around 3500 HVPD. The "conservative" predictions by NZTA in 2031 are 23000 v.p.d. and 3450 h.v.p.d.

Assuming these figures are correct and following current traffic flow patterns the graph below shows the average seconds between vehicles on SH58 in 2031. Note: this excludes any new activities like a proposed Quarry Consent with another truck 1000 trucks per day proposed in this area.



From the current Porirua District Plan,

C7.1 OBJECTIVE TO ACHIEVE A **SAFE AND EFFICIENT TRANSPORTATION NETWORK** THAT ENABLES THE PEOPLE OF THE CITY AND THE WIDER COMMUNITY TO PROVIDE FOR THEIR SOCIAL AND ECONOMIC WELLBEING WITHOUT CREATING SIGNIFICANT ADVERSE ENVIRONMENTAL EFFECTS.

The Objectives and Policies outlined in the District plan C7

The relevant extracts from the current District plan are in italics below for reference.

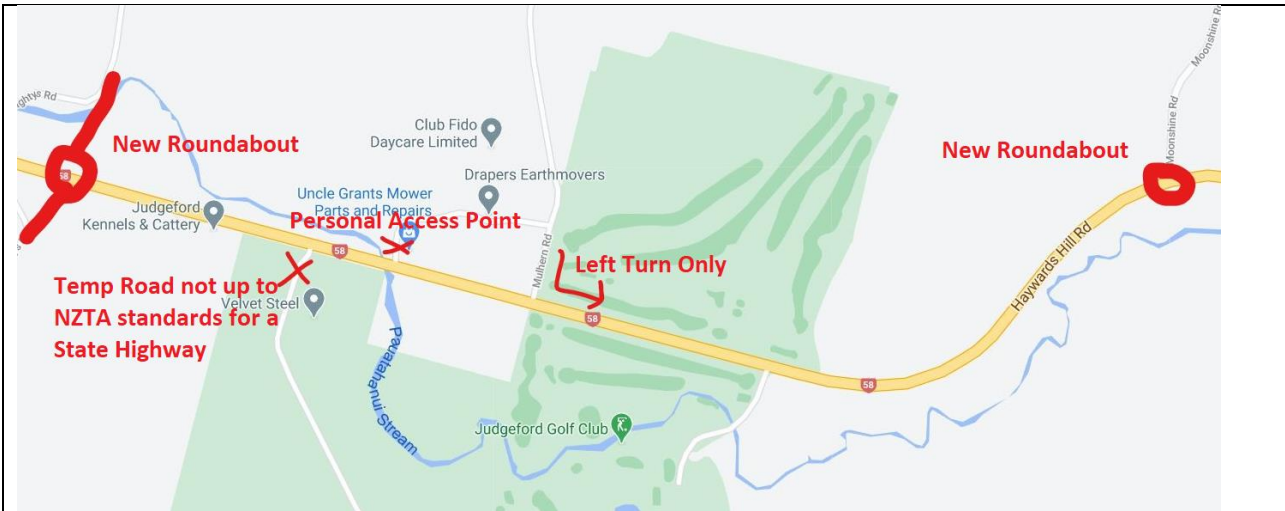
*The State Highway is predominantly a through route with transport efficiency as the main measure of its sustainable management.*

*The effect of activities on efficient traffic flows and the effect of traffic on amenity are major aspects of the consideration of effects of activities throughout the City.*

Regarding traffic flow onto SH58, the only proposed entrance in this area Traffic flow onto SH58 Onramp/off ramp facilities in this area do not exist as shown below and adding more side roads would further disrupt the traffic flow and safety.

SH58 safety improvements will add a centre barrier and two roundabouts as shown below. Thus, Mulhern road will be Left out only and vehicles will have to travel to the nearest roundabout to travel in the opposing direction. This will add further traffic volume in this area.

Note the Current Willowbank Access road is not up to NZTA Safety standards hence the current 50km/hr temporary speed zone. Further, there are no plans to make this intersection safe for large vehicle numbers and for heavy vehicles due to no space to allow for Deceleration/Acceleration lanes.



Placing an Industrial zone with a large number of extra traffic movements per day (staff, visitors, trucks, etc) on and already overloaded State highway and Designated Regional Cycle Route, does not meet the District plan and Council objectives and causes a major impact in the region to traffic flow and compromises user safety (Vehicles and Cycles). This statement is still valid with lane separation after the SH58 safety improvements in this area should they happen.

### Infrastructure

Discussions with Council staff suggest it would be the developer who would invest in bringing services to the FUZ area. Service required would include Sewerage, Water (GWRC supply is nearby), Power upgrade, Fibre. Roading and parking would also be required and possibly some recreational investment (e.g. contribution to cycleways).

Given the lack of:

- usable land,
- the large number of landowners,
- the fragmented sections,
- the distance to existing services,
- the flood mitigation and waters management
- The amount of and in this area too steep for development in this area
- the topography required to be traversed to connect to existing services,

it is extremely unlikely that a developer would see the massive investment in the area proposed as a good investment and therefore the chances of this area being a success are minimal.

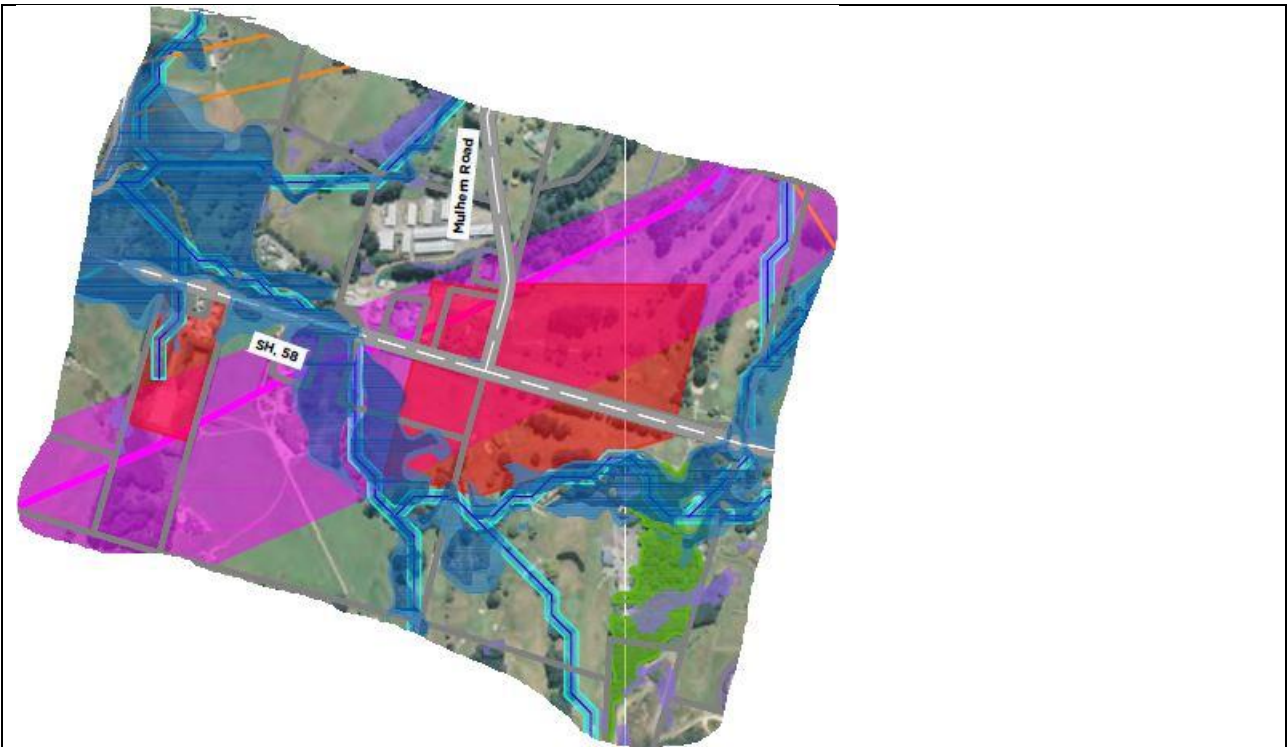
### Other constraints on this land

As shown in the Landmatters' diagram, the Moonshine fault passes directly through and bisects this area. This would further make investors nervous about this area due to higher build costs and higher insurance costs. (see pink area in the diagram of the proposed area below).

Further a corner of this land includes a National grid corridor (top left orange lines in diagram below) which inhibits large development or would require changes to support development.

The Red areas below also depict HAIL sites thereby potentially increasing development costs depending on the level and type of contamination.





### Noise Section in Proposed District Plan

SH58 is a major corridor with many existing dwelling units which by definition contain sensitive noise spaces.

Many of these Dwellings are of lightweight construction therefore susceptible to noise.

I oppose the statements being included in the Proposed District plan addresses noise as listed below.

*The following are all exempt from the rules and standards in this chapter:*

- *Vehicles being driven on a road (within the meaning of section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity;*

It is noted that the Proposed District plan SH58 noise corridor encompasses many houses – see the picture below of houses marked in a 1km stretch of road in Judgeford. This clause above means that significant changes can be made to SH58 without any consideration of the impact of noise on the existing dwellings. At the extreme, SH58 could become a motorway without any mitigation required. The District plan should help protect its residents from unhealthy actions that could potentially be imposed upon them like this.



Whilst it might be acceptable to require new buildings erected in a noise zone to meet Acoustic sound reduction requirements, it allows NZTA to make road changes that impact significantly on current residents and buildings in these zones without any consideration of their well-being. The WHO



organisation acknowledges the impact towards Mental health that noise (including road noise) has on people. In a report "Burden of Disease from Environmental Noise" ... it states "... evidence on the relationship between environmental noise and specific health effects, including cardiovascular disease, cognitive impairment, sleep disturbance and tinnitus." and "These results indicate that at least one million healthy life years are lost every year from traffic related noise in the western part of Europe. Sleep disturbance and annoyance, mostly related to road traffic noise, comprise the main burden of environmental noise."

The District Plan needs to protect the investment, physical and mental health for residents of the current properties from future changes on the road use that would impact on their wellbeing.

Two Consent applications soon to be filed, related to the section of SH58 shown above are examples of how road noise could be significantly increased without any requirements or consideration of the impact on nearby residents:

1. Willowbank Quarry has traffic in/out of the intersection on the Judgeford straight and currently are running 64 heavy vehicles from 10am – 3pm and 64 from 8pm to 6am. The noise related to these at our house is significant and vibration from these causes pictures in our house to rattle. These are modern trucks selected by TGM for their low noise output yet still cause significant disruption. Fulton Hogan are wishing to extend this consent to run 1 truck per minute (1000 trucks per day) from 6am to 10pm. These would be mostly private trucks of various makes and significantly noisier than the TGM ones currently running. Therefore the accelerating/decelerating would have significant Tonal frequencies that would be extremely disruptive. The noise consideration from this would be horrendous and would seriously impact our lifestyle, property value and health. With the noise corridor proposed, and the exclusion of road noise in this PDP, this would be an allowed activity without any requirements for mitigation!
2. SH58 safety improvements mean a new roundabout would be placed close to our home. This means trucks and cars will be slowing down (e.g. engine braking) into the roundabout and speeding up (accelerating through the gears) out of it directly in front of our property. This will be a significantly disruptive noise of various Tonal frequencies such that it will be significantly more disruptive and noticeable than what is currently a reasonably constant speed flow of traffic and noise. Correspondence with NZTA consultant on noise, Dr Chiles from Chiles Consultants agrees that "As stated in our report, the roundabout will alter the sound characteristics of road-traffic. This will include increased braking and accelerating sounds in the vicinity of the roundabout .. " Again, the proposed District plan allows changes that will significantly impact on residents without requiring any mitigation for residents of existing dwellings!

## Quarrying activities in the Proposed Rural plan.

Willowbank Quarry has been operating to support TGM construction and there have been multiple learnings from this operation that should be included into the Proposed District plan. The proposed District plan does not go far enough to protect the residents.

GRUZ-P5 is vague in its requirements such that it would be easy for any quarry operation to set up without requiring to do much to protect the ambience or environment. Points 1 to Point 6 in GRUZ-P5 are vague statements which have no specific measurements related to them. The result is a Quarry could start operation without too much consideration on the environment or residents. For example, Point 1: It is evident from this current Willowbank Quarry operation that a much larger clearance is required from any part of the operation to any existing dwelling to avoid nuisances like noise, vibration, dust, light spillage, etc. The GRUZ-P5 rules in the PDP needs to be modified to include a minimum of 500metres separation limit from any quarry operation to any existing dwelling.

Further, Truck movements along the access road to the Willowbank quarry and at the access point with SH58 are a huge disturbance to a number of residents but would be pass the proposed plan rules. This is not acceptable and the PDP needs to protect its residents and the Environment by limiting movements per hour and noise (including tonal noise) limits.

<p><b>Do you: Support? Oppose? Amend?</b></p> <p>Oppose FUZ on Judgeford Flats          Amend Quarry rules GRUZ-P5          Amend Noise Rules</p>
<p><b>What decision are you seeking from Council?</b>  <b>What action would you like: Retain? Amend? Add? Delete?</b></p> <p>Oppose FUZ on Judgeford Flats and make Judgeford Flats Rural Lifestyle zone.          Amend Quarry rules GRUZ-P5 to provide 500m separation from existing dwellings and add specific requirements on noise, vehicle numbers, noise, vibration etc such that specific measures must be met and adhered to          Amend Noise Rules to ensure transport networks are not excluded from meeting PDP rules</p>
<p><b>Reasons:</b></p> <p>FUZ in Judgeford has serious issues related to it and there are significantly better areas to locate this. Judgeford flats is suitable for slightly higher Dwelling intensification but not a full Industrial development like this proposed.          Quarrying activities are not well enough restricted to protect the environment and the residents          Noise created by the transport corridor is able to increase with changes without any mitigation on existing properties.</p>

Please return this form no later than **5pm on Friday 20 November 2020** to:

- Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY or
- email [dpreview@pcc.govt.nz](mailto:dpreview@pcc.govt.nz)

Signature of submitter  
*(or person authorised  
to sign  
on behalf of submitter):* \_\_\_\_\_

Date: \_\_\_\_\_

*A signature is not required if you make  
your submission by electronic means*