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**To:**

Porirua City Council  
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**By email: [dpreview@porirucity.govt.nz](mailto:dpreview@porirucity.govt.nz)**

**19 November 2020**

**Submission on proposed district plan**

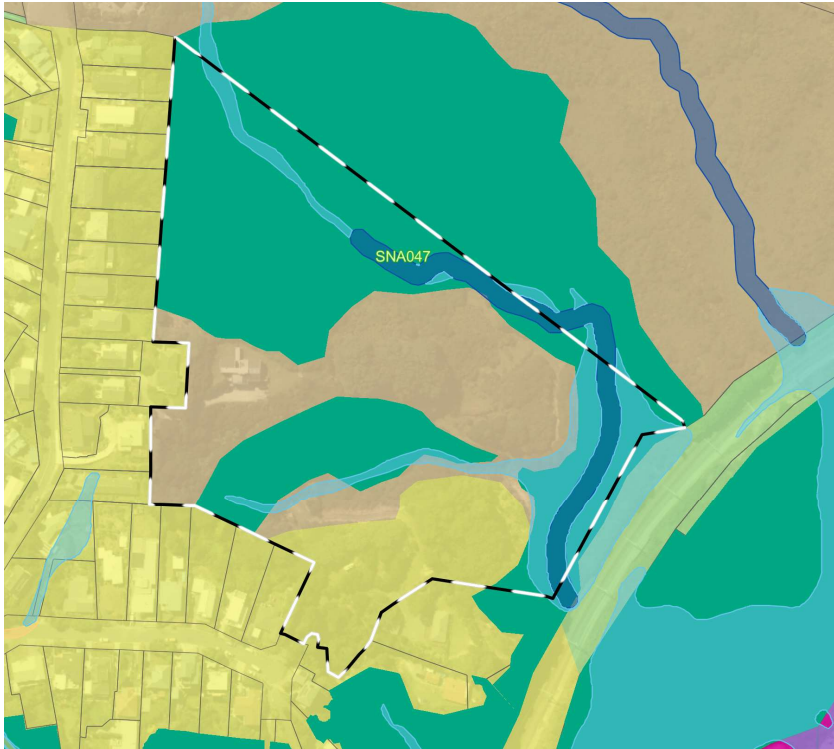
Please find our submission on the proposed Porirua District plan. Our submission covers six topics:

1. Rezoning - 10A The Track
2. SNA's
3. Noise rules
4. Hazard mapping (Flood mapping)
5. GIS database accuracy
6. Renewable energy

**1 Rezoning – 10A The Track, Plimmerton**

We support the rezoning report for 10A The Track, Plimmerton because rezoning the land appears to be in line with issues facing Porirua's residential land supply, with the 2019 Housing and Business Capacity Assessment identifying the Porirua needs to accommodate 10,000 new residential dwellings over the forthcoming years.

In Section 4 of my submission I raise an issue with respect to the accuracy of the flood mapping represented in the PDP. It may not have a significant bearing on the mapped area once corrected, however I believe that the proposed residential boundary zone on our land could extend northwards a little and end at the ponding mapping shown in light blue in Figure 1. This will then eliminate a small area of the Rural Lifestyle Zone being wedged between the residential zone and the flood mapped area, which is otherwise unusable. It seems a more natural location to locate the boundary. This move will assist with the City's needs for increased residential land supply.



**Figure 1. Residential rezoning map of 10A The Track**

## 2 SNA's

Section 5.2.4 of the Section 32 Evaluation Report on Ecosystems and indigenous Biodiversity, outlines consultation undertaken to date. There is discussion on engagement with individual landowners and engagement back to 2001.

We have owned our property in Plimmerton for 20 years, purchasing it in 2000. We were first made aware of the mapping of significant vegetation in 2012, when PCC sent us a letter with map attached identifying areas as significant vegetation which included some mapping on our land. That letter and map are attached as Annex 1.

That project then seemed to go on hold and we heard no further from PCC until 2018 when SNA's had been identified and published on the PCC public website. The first revision of the mapping of the SNA's on our property had not included any further consultation with ourselves since 2012. The initial 2017/2018 mapping is shown in Annex 2, which are screen shots of the PCC website from 5/10/2018.

I have added the 2012 and the 2018 mapping into a GIS database to show a comparison between the two. The area covered in 2012 was 142 m<sup>2</sup> (0.0142 ha) while the area initially identified as an SNA in 2018 was 31,188 m<sup>2</sup> (3.12 ha). This is an increase of more than 21,000%. Yes, twenty-one thousand percent. The proposed 3.12 ha represented about 70% of our rural property of about 4.5 ha. Those two different areas are shown in Figure 2 and not consulting with us as the landowners, during the process of moving from the orange area to the grey shaded area, seems extraordinary.



**Figure 2. Comparison of 2018 SNA mapping and 2012 Vegetation mapping**

PCC maintains that the procedure used to identify the SNA's included in the PDP are "Robust". I hold a very different view.

Following initial publication of the SNA's in 2018, I was intrigued to notice that the mapping of the areas on our land followed some interesting boundaries which included following the outline of our house on its northern side and the outline of a storage shed. The mapping would never have taken on this shape if it had been done by a human. Through enquiries, I understand that the initial mapping was done using software and aerial imagery for colour differentiation. The resulting automatically generated mapping formed the starting point for all further discussion, despite that starting point being incorrect and not being identified, mapped or ground truthed by an ecologist. I do not believe that the starting point was "Robust".

In addition to the mapping following incorrect boundaries, it included part of our lawn, a plantation of eucalyptus, areas still covered in gorse and vehicle tracks. I raised these issues with PCC and scheduled a site visit with the council ecologist, Paul Blaschke. That visit took place on 20 July 2018. Following the visit some changes were made to the SNA however it was still incorrect.

After further feedback on the SNA, PCC contacted the ecologist who then viewed the eucalyptus plantation from the Plimmerton industrial area. Even after this visit the eucalyptus plantation was still included in the mapped SNA. I took some photos of these trees at the time as I remained completely mystified over the SNA identification process that took two requested ecological visits and still had the plantation included. Photos of Eucalyptus are shown in Figures 3 and 4 and it is difficult to understand why it was still included after two site visits by the Council's ecologist. I have included photos in Figures 5 and 6, from 2006 which show the state of the gorse on the land at that time, areas now considered to be SNA's.





**Figure 3. Eucalyptus from industrial area 2019**



**Figure 4. Eucalyptus from house 2019**



**Figure 5. Eucalyptus and gorse - April 2006**



**Figure 6. Area north of house in April 2006, now included in SNA.**

Through further email correspondence PCC finally got the eucalyptus plantation excluded from the SNA mapping however I still had issues with the mapping of some of the areas. A further visit was undertaken with Astrid van Meeuwen-Dijkgraaf from Wildlands on 11/06/2019. This visit resulted in some further minor alteration of the SNA mapping. The final SNA on our property, identified in the PDP, is 2.43 ha or 54% of our rural property.

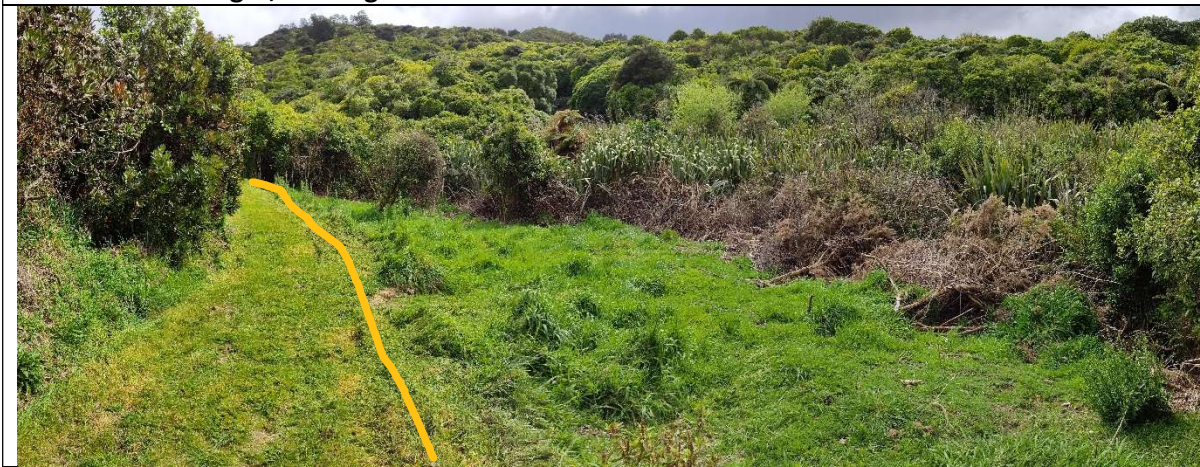
The final mapping of the SNA remains inaccurate in places and does not actually map the vegetation that is supposedly being protected through the SNA identification process. Two areas I identify here as examples (there are others) are the boundary on the north western side of our property and an area adjacent to the swamp. The SNA mapped on our property has a straight-line boundary on its western edge, see the vertical red ellipse in Figure 9. This is where the SNA follows the zone boundary between residential and the proposed rural lifestyle zones. The actual bush does not follow that zone boundary and for a large part covers part of the residential properties i.e. the bush doesn't simply stop at the zone boundary. Rather than mapping the actual extent of the bush to be included in a potential SNA, it seems it was simply convenient for the Council to end this on the residential boundary, however ecologically it makes no sense. A photograph of the bush area is shown in Figure 7.

Figure 8 shows an area adjacent to the Taupo swamp fragment on our land which is currently identified as part of the SNA in the PDP. The area is shown in the map in Figure 9 too as the inclined red ellipse. This grassed area is no different to many other parts of our land where I have cleared gorse and weeds and cannot be classified as an SNA based on the ecology in the area.





**Figure 7. Western edge of property, orange line shows approximate location of boundary. Current SNA on right, nothing on left.**



**Figure 8. Photo of edge of Taupo swamp. SNA on right.**



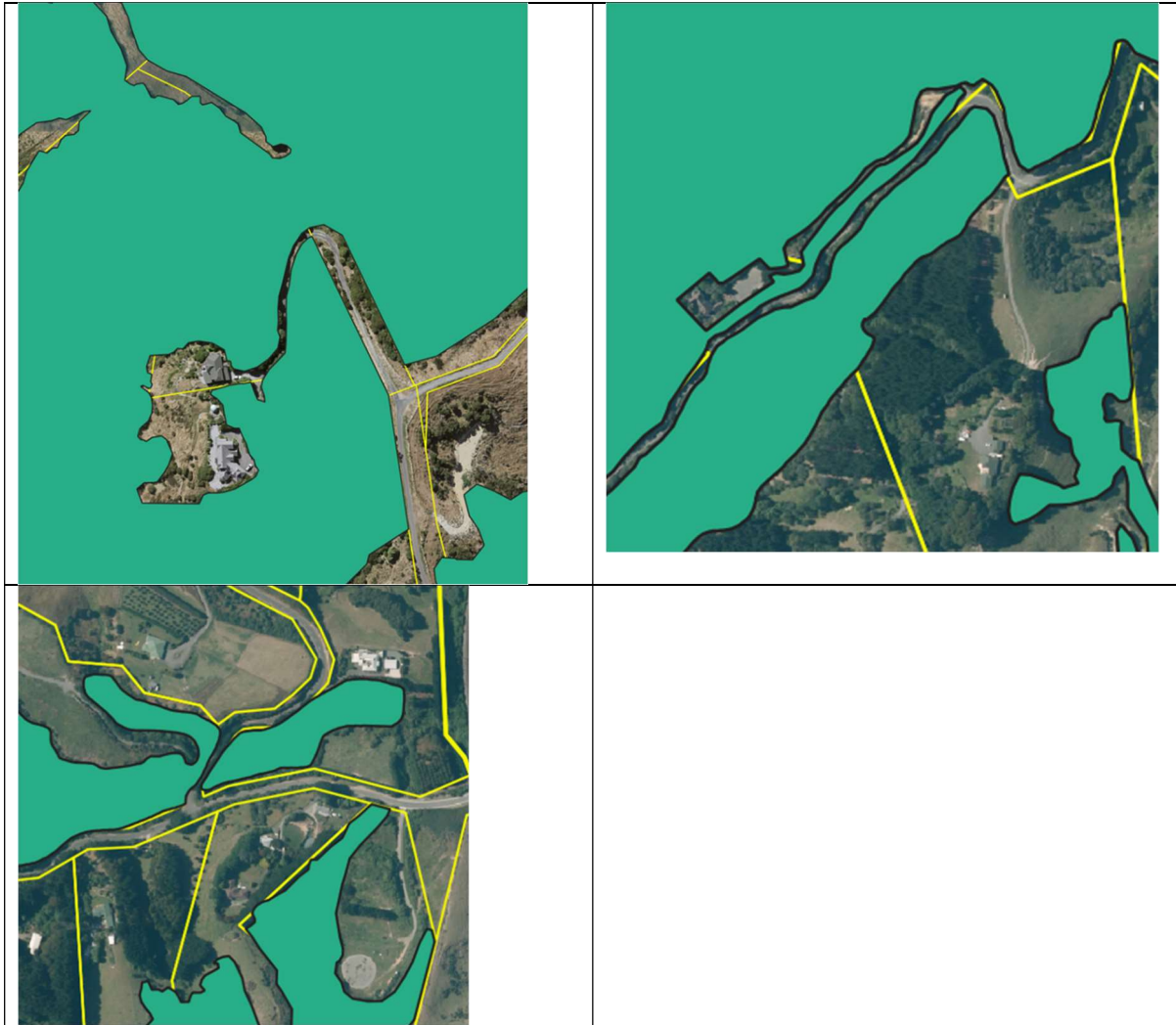


Figure 9. Map showing areas photographed in Figures 6 and 7.

I have several vehicle tracks on the property and at the initial identification stage I noted that these should be excluded from the mapped SNA. I was told that where the vegetation is continuous the preference would be to map the entire area and track maintenance would be permitted and allowed for in the rules. I now see many areas in Plimmerton where driveways, tracks and PCC roads have been carefully excluded from SNA mapping, a selection are shown in Figure 10. The inconsistency is very obvious, and I can't understand why my request was dismissed.







**Figure 10. Selection of images from PDP showing vehicle tracks within proposed SNA's in the PDP.**

Given that the SNA mapping shows a “line on the ground” and not the mapping of a tree canopy, existing tracks should be excluded from the mapping where requested. It is quite possible for the canopy to overhang the track, however as the track existed prior to the existence of the mapped SNA it must be excluded. The proposed rules only allow for vegetation clearance within existing tracks and not vegetation outside of the track which overhangs it to be cleared.

I have owned the property for over 20 years and have put in tremendous effort to rid the land of gorse and let the native vegetation return. Through none of those 20 years was there any assistance from PCC and they left me to manage my rural land in a way that I saw fit. Given that PCC wish to include more than half of our property (2.43 Ha) as SNA, I can only assume that they think I have done a reasonable job of managing the vegetation on our land. Despite being uninterested in the vegetation until 2018 they are planning on rewarding my good work by imposing significant conditions and restrictions on that land. The costs of holding land for SNA's appears to fall with private landowners and it appears no consideration has been given to this. I will suffer financially because of the proposed SNA mapping and this has not been considered or recognised in any assessment I have seen.

The consultation and manner in which PCC has undertaken the SNA mapping is a long way from being textbook. Not speaking to us as impacted landowners between 2012 and 2018 and publishing draft SNA's covering more than half our property was only ever going to attract negative feedback. I suggest that if PCC had come to me and discussed what they were trying to achieve and were able to work with me as a landowner to identify areas that I may have been agreeable to be mapped as SNA's, there would have been a different outcome.

After all the shuffling of the SNA boundaries on our property, the area mapped as SNA in the PDP compared to the 2012 Significant Vegetation mapping, completed only six years earlier, is shown in Figure 11. The difference between the two is significant especially given that they were completed only 6 years apart. Finally, at no time until the PDP was published were the proposed rules and restriction around those SNA's discussed or disclosed to ourselves.



**Figure 11. Comparison of PDP 2018 SNA mapping and 2012 Vegetation mapping**

I submit that the SNA's as drafted should be deleted from the PDP.

If the SNA's are going to be included with the extensive set of proposed rules, there are three aspects I believe that need to be addressed:

- The SNA's need to be correctly mapped and agreed with private landowners prior to inclusion in the district plan.
- PCC needs to provide rates relief on a pro-rata basis for land included within SNA's.
- The cost of any ecological studies required by private landowners for Resource Consent applications need to be borne by the PCC and not the land-owner.



### 3 Noise rules

I have a number of concerns in relation to the noise rules with respect to the road and rail corridors. These rules appear to be solely to protect those infrastructure assets from reverse sensitivity issues rather than controlling the noise being emitted from those activities.

The Acousafe report discusses how the intent of the RMA is to internalise noise effects from an activity but then proceeds to suggest noise rules for the Porirua District where the road and rail noise need to be managed by neighbours to these activities. There appears to be no requirement on those noise makers to even try and achieve some sensible level of noise. The noise maker needs to be below some maximum noise level, even if sound insulation is required on neighbours, otherwise their noise emissions can continually creep upwards over time.

The noise rules for the rail corridor allow for development adjacent to the rail line provided measures are taken to reduce the internal noise level within any new house, within 100 m of the railway. That additional building attenuation comes at a cost to the landowner, which based on other plan change submissions appears to be in the order of 15%. In addition, there will be the cost of an acoustic assessment for the building. In the case of a new house being built adjacent to an existing one, the proposed rule will provide a lower internal noise level for the new house but provides absolutely no protection to existing houses. If however, existing houses are re-built in the future in the same location, they too will need to comply with the new noise rule. The Acousafe report did not recommend a noise setback for reverse sensitivity in the residential areas or areas where there are existing dwellings, however the Council appears to have ignored that advice and imposed a rule across the district. The recent Hutt City Plan Change 39 – Transport, expressly excludes existing houses with having to meet the reverse sensitivity requirement through sound insulation and needs to be adopted here too.

While some protection needs to be afforded to the existing rail and road corridors, development cannot be unduly restricted on adjacent land, particularly given the need in Porirua City to provide for new dwellings. I too agree it is about balance but believe that the rules withing the PDP are completely stacked in the favour of Kiwirail and NZTA. The proposed noise rule does not appear to strike a balance, it puts the burden of rail and road noise on adjacent landowners and no onus on those two operators to take any responsibility for their noise emissions by making improvements (reductions) over time.

Issues with the rail noise:

- The noise corridor mapping is still incorrect and does not match the rules. Any setback should be from the rail centreline and not the Kiwirail property boundary as is currently shown.
- The distances listed assume line of sight to the railway or road. Where there is screening or obstruction to a direct line of sight, the noise levels will be lower or the potential exists to build closer to the railway without the need for acoustic insulation on the building. The terrain shape and other barriers need to be able to be included in an assessment rather than simply assuming that all new houses within 100 m (or other distance) require acoustic insulation.
- If a proposed development lies within 100 m (or other distance) of the railway but that part of the railway cannot be seen it should not require acoustic mitigation even if other parts of the railway are visible at greater distance. The “distance” that is important is the closest direct line of sight distance and not a simple 100 m offset from the railway.

- The 100 m distance appears to have been derived from noise predictions provided in support of changes to the South Taranaki District Plan. There don't appear to be any measurements undertaken in the PCC district where the rail traffic is significantly different, with 90% of the rail movements being commuter trains in the Porirua district.
- There is an assumed noise level for the railway. This level will vary on a number of matters including train speed. Given the number of stations on the line in the Porirua City, I would expect the freight trains will be running at lower speeds and therefore the noise levels are potentially going to be lower than those assumed in South Taranaki, see Figure 12 as an example. Acousafe state that their monitoring "would generally" support the Kiwirail predictions for South Taranaki however no examples for Porirua are provided. Given that a difference of 3 dB is a doubling of sound I would expect some validation of the Kiwirail predictions for South Taranaki. If Acousafe's measurements (in Porirua) are close to the Kiwirail predictions, why have they not been tabulated to confirm. Setting noise setback distances in the Porirua District based on predictions completed for South Taranaki seems irrelevant really.



**Figure 12. Speed restriction approaching Plimmerton station.**

- While there is an assumed design level of 70 dBA at 12 m from the rail line, the rule does not restrict that from increasing over time and places no incentive on Kiwirail to make any improvements over time. Under the operative District Plan, Kiwirail would need to show it has undertaken the best practical option rather than having a rule allowing an increase in noise emission with no onus on the noise maker to reduce the noise level, instead moving the obligation to the neighbouring noise receiver. This is unacceptable.
- The Acousafe report states that the rail noise limit is different to the road noise limit as the traffic flows peak in the morning and the evening while the rail noise is all day. That same report states 90% of the rail movements in Porirua City are commuter trains and analysis I have undertaken of the Porirua timetable, as shown in Figure 13, shows peak train movements at similar times of the day to road traffic. The time of day noise profile does not explain the need for different road and rail noise descriptors. If it is the time of day profile that is driving the noise descriptor, and the daily profiles are the same, why not use the same noise descriptors for road and rail?



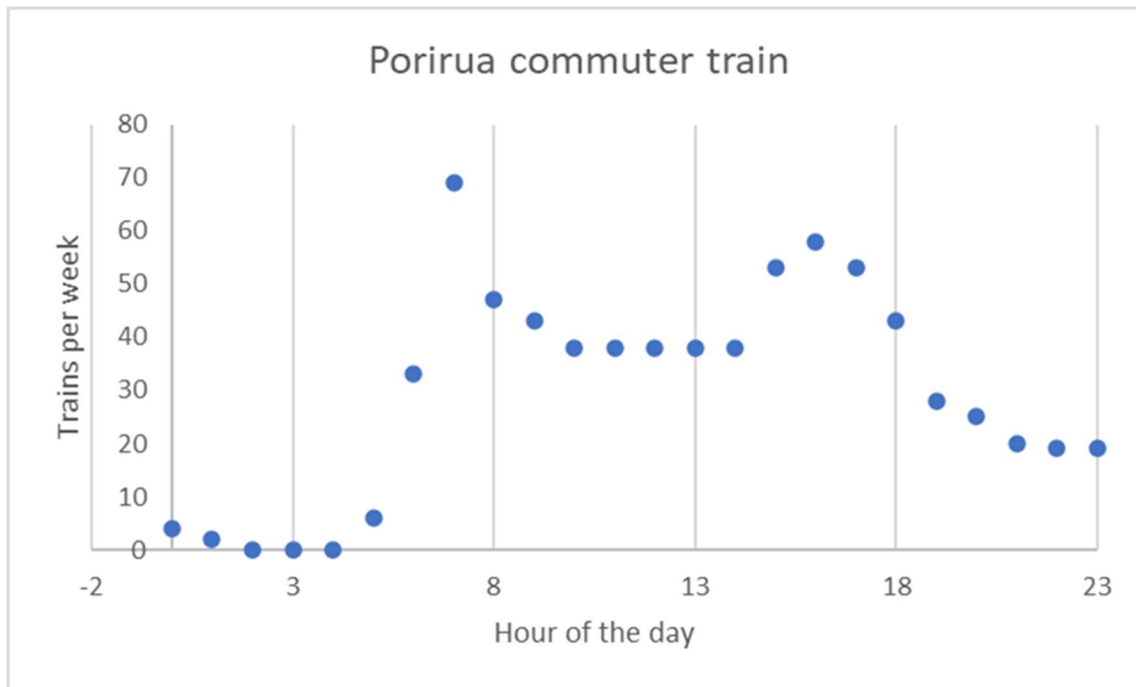


Figure 13. Porirua commuter train numbers by time of day.

- The Acousafe report suggested that reverse sensitivity lines should not be included for existing residential areas adjacent to the rail line. This advice has been completely overruled in the PDP, imposing significantly greater noise levels on all those residents currently living within close proximity of the rail line and SH1. It removes some of the protection they are currently afforded under the operative district plan. I suggest that not many of those residents are aware of this change despite the PDP being notified for a long period of time.
- If the SH and rail corridors did each actually need a 100 m buffer setback (which I don't agree with) to protect against reverse sensitivity, at all locations where the SH and the rail are adjacent to one another or in close proximity to one another, the buffer distance should theoretically increase up to 200 m as the source noise doubles when these noise sources are adjacent to one another. Alternatively, if the 100 m was acceptable where the noise corridors are adjacent to one another, at locations where they separate, that should decrease.

Using the GIS data off the PCC web site, there are 1667 buildings within the noise corridors proposed, i.e. within a 100 m buffer each side of the highways and rail lines. This is 7.8% of the 21,482 building points shown in the PCC District. The future cost impact on that number of houses is significant, and if the same noise rules are not applied in neighbouring council areas, why should Porirua City rate payers be burdened with this stringent requirement. If this noise corridor is reduced by 60 m each side, i.e. to a width of 40 m each side of the rail and state highways, the number of buildings reduces to approximately 708 or 3.3% of all buildings. I note that there is some refinement required to the numbers I have used as they include schools and commercial buildings, however also where a building contains a number of sub-ownerships, these are shown as one. The analysis does give an indication of the impact that the proposed noise corridor would have and it is surprising it has not been included in the analysis, especially as the Council's own noise consultant recommended that the noise corridor **should not** apply in the residential zone.

It is disappointing that PCC is proposing on adopting a noise rule, which have significant long-term cost impacts on this number of buildings without actually quantifying the existing noise from the rail. It does not appear that any noise measurements were taken to quantify the rail noise in some critical points within Porirua District expect choosing to rely on some prediction information from South Taranaki. The Council appears happy to pass the cost of all future noise assessment and increased building costs on to home owners and at the same time appears unwilling to quantify the existing environment more accurately prior to deriving new noise rules.

The Acousafe letter to PCC dated 10 June 2020 states that they did not recommend that the Norwegian Vibration standard be adopted in the PDP. I agree with that comment. I understand that the Norwegian Standard referenced is for the measurement of vibration in buildings that exist close to railway corridors. It is not intended for use in making assessments where a building does not exist. Ground vibration levels are influenced by a raft of factors as stated by Acousafe but in addition to those, the geology between the railway and the house will play a significant part too. Understanding all of these is a complex task and will come at a significant cost if needed to gain a resource consent. Even trying to get a copy of that Norwegian standard comes at a cost. Before even considering including the Norwegian Standard as a reference in the District Plan, the Council should provide a list of organisations in the Wellington region that have experience with the Standard, the cost of an assessment under that standard and confirmation that it can be used for new buildings.

My reading of other relevant District plans, some of which are referenced in the Section 32 reports, is as follows:

- South Taranaki District Council. 20m setback to State Highway in rural zone. 10m from rail corridor boundary in the rural zone.
- Kapiti Coast District Council. Proposed District Plan. Sound insulation required on buildings within 40 m of rail corridor designation.
- Upper Hutt City Operative District Plan 2004. Sound insulation required within 30 m of a site used for railway purposes in the Wallaceville Structure Plan area.
- Hutt City Council Plan Change 39 – Transport 27 March 2018. 40m to Rail and State Highway.

The Hutt City Council Plan change appears to be the most recent to address these same matters, where a 40 m setback was accepted position by all parties. Acousafe has cited work undertaken for the South Taranaki district plan. Why PCC sees fit to more than double any of the recent precedents in a district that has be stated to have the highest median rental prices, is difficult to comprehend.

If the Council insists on maintaining a noise buffer proposed in the PDP I submit the follow need to be included:

- The buffer is no wider than 40 m from the edge of a State Highway or the centre line of the existing rail tracks, based on the Hutt City Council Plan change 39.
- The buffer zone should only apply to rural & rural residential areas, i.e. all existing houses are excluded.
- The noise corridor mapping should be corrected to show the distance from the rail centre line and not the Kiwirail property boundary.
- A maximum noise level be placed on the noise from State Highways and rail corridors to prevent these creeping upwards with time.
- Remove the reference to the Norwegian Standard for ground vibration.



#### 4 Hazard Mapping (Flood Mapping)

While I haven't undertaken a complete review of PCC's work on flood and stream mapping, the information which is shown for our property contains an error. The error is due to the incorrect placement of a Kiwirail culvert connecting a fragment of Taupo swamp on our property to the main Taupo swamp body. The information appears to be derived from a supporting document "Taupo Stream Stormwater Catchment, Model Build Report", by Wellington Water. Figure 5 of that report shows the Drainage system of the southern part of Taupo Swamp. The drawing includes SW (storm water) pipes and SW nodes. The pipe and nodes on the eastern side of our property are shown in the wrong place.

As a result of this error, the stream mapping (and I assume the flood mapping) for this area is incorrect. I visited the area on 18 Oct 2020 to take some photos for inclusion in my submission here. They are included in Figures 14 to 16.

I note Kiwirail appear to have recently marked their culverts with orange marker posts and it is quite clear where this is located "on the ground" i.e. as-built. It is not in the location used in the Wellington Water report nor in the location shown in the PCC GIS database for the PDP. Figure 14 shows a panorama looking south which shows the orange marker for the culvert location on the right and the culvert exit on the left immediately in front of the white post. The stream course included in the PDP is shown in Figure 17 and I have included the correct location of the culvert in Figure 18.

As stated above, I have not reviewed the mapping of the entire region, however given the one place I have examined has an error, I can only assume that there are potentially more.



Figure 14. Panaroma showing culvert physical location.



Figure 15. Culvert exit



Figure 16. Culvert entry.

Also included in the Hazard mapping is a layer called "Flood\_Hazard-Ponding". I am uncertain how this has been derived; however, it shows ponding in a watercourse on our property that generally only flows during a rain event. The ponding is shown in areas which are up to 65 m greater in elevation than the swamp into which they drain. It is difficult to imagine how this ponding has been determined.





Figure 17. Flood mapping included in PCC PDP.

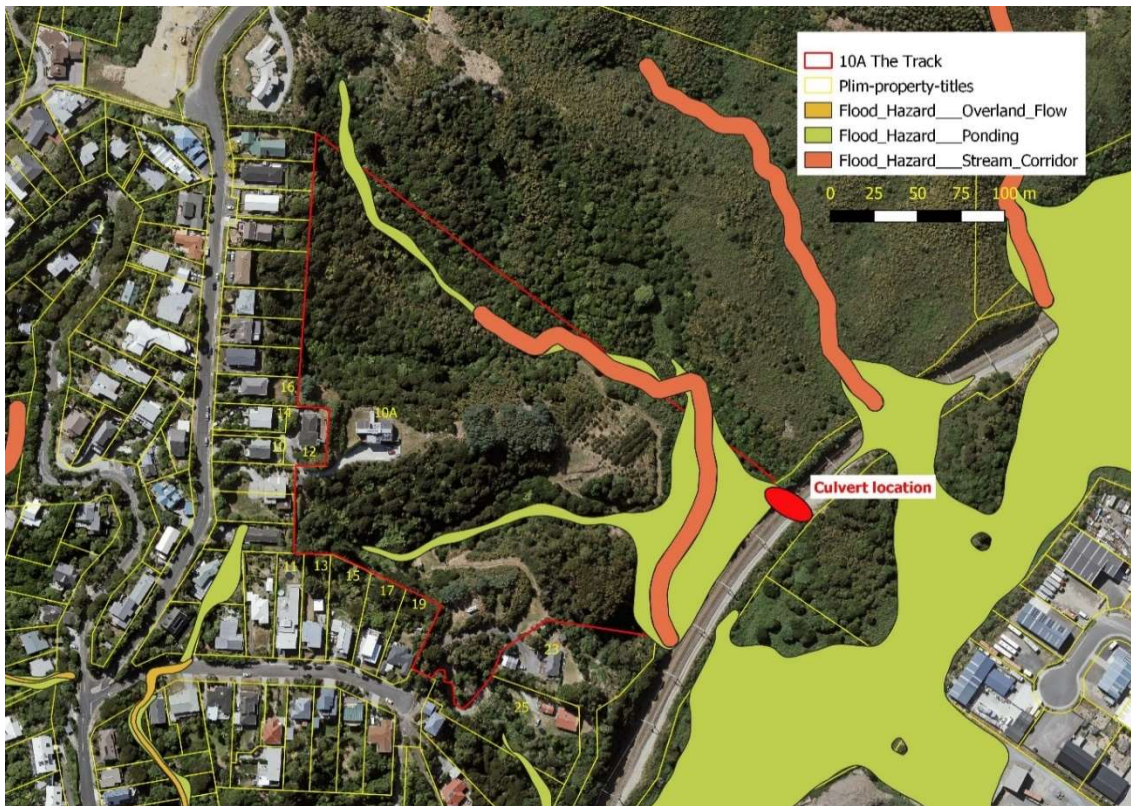


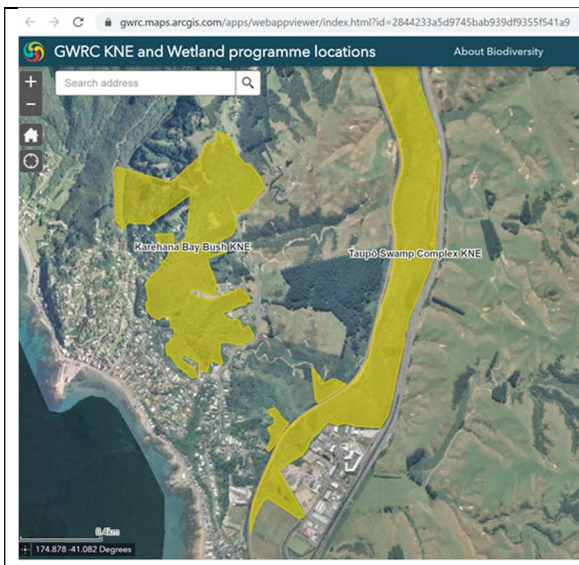
Figure 18. Flood mapping included in PCC PDP, showing actual location of the storm water culvert.



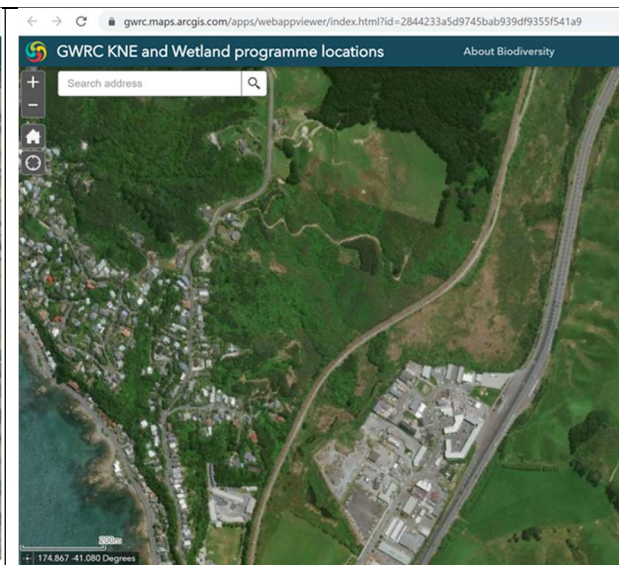
**5 GIS Accuracy**

The error in the flood mapping and noise corridor, goes to another concern that I have with respect the accuracy of the GIS information held by the Council in relation to the PDP. Clearly the PCC have included information in their GIS database which is sourced off other databases and then put it forward on the PCC site as being accurate irrespective of how accurate the underlying (original) data is. This applies to the data sourced from Wellington Water as an example.

Another example of this is the mapping on the fragment of Taupo swamp on our property. I have had numerous discussions with Greater Wellington (GW) over the years as to the extent of the swamp fragment. When they last updated their GIS system we agreed on an outline, which was largely modified by myself based on various outlines and what I could see as the actual swamp boundary, but hand drawn on a scanned image. The discussion with GW at the time was they wanted an indicative outline rather than something that was accurate to the last millimetre. In more recent discussions with GW they have confirmed this view that the outline should be seen as inductive rather than absolute. As the images in Figures 19 and 20 show, extracted from the GW GIS site, when you zoom in on the KNE boundaries, they “turn off” when one zooms in too close. That boundary is not meant to be absolutely accurate. I note that numerous ecological reports with respect to the Taupo swamp cite the GW mapping, however the accuracy of the line is never included or stated.

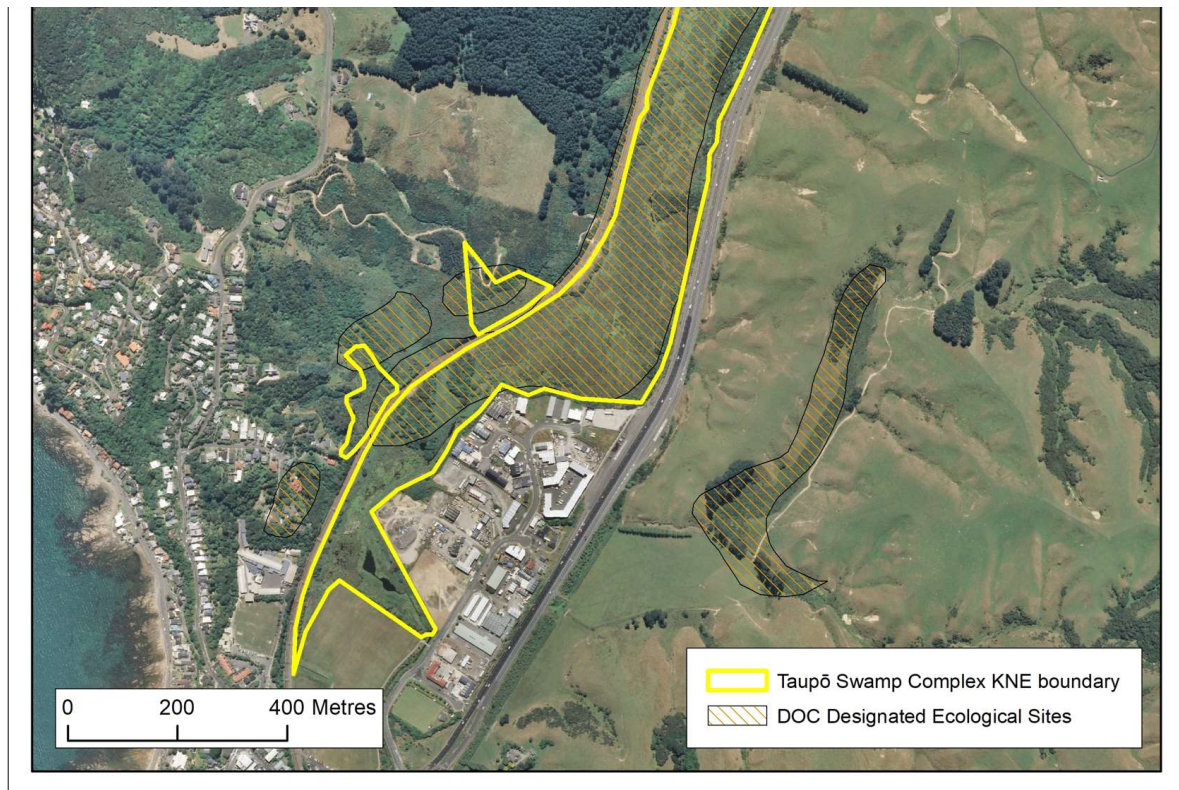


**Figure 19. KNE & Wetlands shown in GWRC mapping.**  
Zoom level indicator in lower left shows 0.4km



**Figure 20. KNE & Wetlands shown in GWRC mapping.**  
Zoom level indicator in lower left shows 200 m (0.2km)

Another example of too many databases trying to hold similar information is that held by DOC as shown in Figure 21. The hatched areas designated as DOC Designated Ecological Sites appear to be hand drawn but are now digitised. From the description of the information which is attached to that database, the areas are in reference to the fragments of the swamp on the western side of the railway line. Clearly they are not in the correct location but they should be corrected. It appears no one is willing to make changes or delete items. This again goes to the point where reliance is placed on externally sourced data without full knowledge of the source of the information and accuracy.



Map 4: DOC Designated Ecological Sites within the Taupō Swamp Complex KNE site

### Figure 21. Ecological zones identified in DOC database

As the PDP appears to be weighted towards an electronic version and links to associated maps, I believe that the plan needs to include reference to the following points:

- There needs to be reference to the accuracy of the mapping information, particularly for lines that show items which have some element of subjectivity. For example, I would expect the SNA boundaries to have a lower stated accuracy that property boundaries or council services.
- There needs to be acknowledgement by PCC that their GIS mapping relies on databases provided by others and that PCC have not determined the accuracy of each complete dataset. On this basis, if property owners identify errors that require correction, the process to get changes made needs to be straightforward, i.e. it should not require another plan change nor make it so difficult that landowners give up and errors persist.

## 6 Renewable Energy

Despite the acknowledgement by the PCC that we are facing a Climate Emergency, the renewable energy chapter, in my opinion, is going to do little to encourage any significant renewable energy generation in the district.

Given the Council's approach on protecting ecology through SNA's it is unbelievable that more effort has not been put into the Renewable Energy chapter. If the city does nothing to protect against climate change, there may be little point in protecting the ecology as temperature and sea level rise may ruin that all. It appears to me that the rules outlined in the proposed district plan are simply to



ensure renewable energy generation has been addressed rather than to encourage changes that could help make a meaningful difference to Porirua's carbon emissions.

The introduction section of the Renewable Electricity Generation chapter sets about listing all the potential impacts from renewable generation facilities however there is no acknowledgement of the benefits they bring or the fact that they will assist in combating the current climate change emergency. Benefits are considered under the objectives, however if the potential perceived negative impacts are listed in the introductory section, the positive impacts should have been listed too.

I am aware of two small turbines installed and operational within the Porirua District, one of which I have owned and operated for over 13 years. Neither of those two installations would have been able to meet the permitted activity status and would have been restricted discretionary. Both would not have met the requirement of Standard REG-S3 due to the setback requirement of the greater of the distance to the site boundary (10 times the tower height) or 60 m to a house on a neighbouring house. These distances have been adopted supposedly to ensure that the turbines don't dominate at neighbouring houses. My turbine would have needed to be 100 m to a property boundary while the actual distance is 57 m. I think the 10 times the tower height is a little excessive and could be halved. I invite Council Officers and Hear Panel members to my property so that they can understand a real world situation of how a turbine dominates or not at neighbours, and then form an opinion as to whether the rule framework proposed is appropriate or not.

I note that community turbines only need to be more than 3 times their mast/pole height to comply with REG-S5 and be a discretionary. It seems odd that community turbines can be closer to the site boundary than a domestic turbine and both be assessed as discretionary activities.

It appears that the council has undertaken some background investigations into wind energy requirements, but it is surprising to see the term mast/pole being used to describe what is commonly called a tower.

There are a number of planning overlays identified in the PDP which would force a large wind farm development to be non-complying. Given the number of overlays within the district, it is surprising that no district-wide assessment has been made on possible wind farm sites in the absence of any of these overlays. This would have identified what proportion of suitable sites lie within zones resulting in the developments being classified as non-complying. The non-complying status will set the bar so high that I don't expect resource consents will be lodged for wind farms in these areas. With my knowledge of the Porirua District and involvement with wind energy projects over 30 years, I believe that the majority of potential wind farm sites outside of these planning overlays is very small.

Another issue I have with the large scale renewable wind generation rules is that if a wind farm does not comply with NZS6808 it changes the activity status from discretionary to non-complying. I agree that wind farms need to comply with NZS6808:1998 but I don't believe that the standard should be used to determine the activity status. Wind farm consent processes are generally protracted applications. It is quite possible for a development to be made public, prior to a consent application being lodged, especially for consultation purposes. This can lead neighbours to submit sub-division plans or building permit applications prior to the wind farm application being formally lodged. In this case a new neighbouring building permit could suddenly change the activity status, irrespective of whether that house is going to be built or not. This behaviour has already been observed in New Zealand. Allowing a neighbour to force an activity status change seems unreasonable.

I am happy to discuss these matters further with PCC and its advisors and will wish to be heard at any hearing, in support of my submission.

Kind regards

A handwritten signature in black ink, appearing to read "Paul Botha". The signature is written in a cursive style with a large, looping initial "P" and a long horizontal stroke extending to the right.

Paul & Julia Botha



**Annex 1 – PCC letter identifying significant vegetation (24/03/2012).**

Date: 24/03/2012

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Dear Julia Botha

**Study of Significant Urban Vegetation in Porirua**

I am writing to let you know that the Council has recently completed a study identifying areas of significant vegetation within Porirua's urban areas. One of the areas identified by this study is within your property as shown on the attached aerial photo. The project is at an early stage and the Council is interested in working with you and other similar property owners on how these areas can be best managed. Council has asked that a discussion document is shared with property owners to seek feedback on ideas and options it might consider further.

Included with this letter is an aerial photo of the significant vegetation site identified on your property, a description of that site (at the bottom of this letter), a copy of a discussion document, and a feedback form, which we would like you to consider.

Further explanation of the study and the values of the vegetation identified can be found on the Council's web-site ([www.pcc.govt.nz](http://www.pcc.govt.nz) key word search 'urban vegetation'). This will take you to the page containing the vegetation study and the site database. I can supply you with a hard copy of this study if required.

Please note we will be holding 'drop-in' sessions if you are interested in discussing any issues with the study or discussion document, dates and locations of these are listed in the discussion document.

Please don't hesitate to contact me if you have any questions or concerns about the reasons why the vegetation shown attached was identified as significant, or if you have any other comments on the vegetation study.

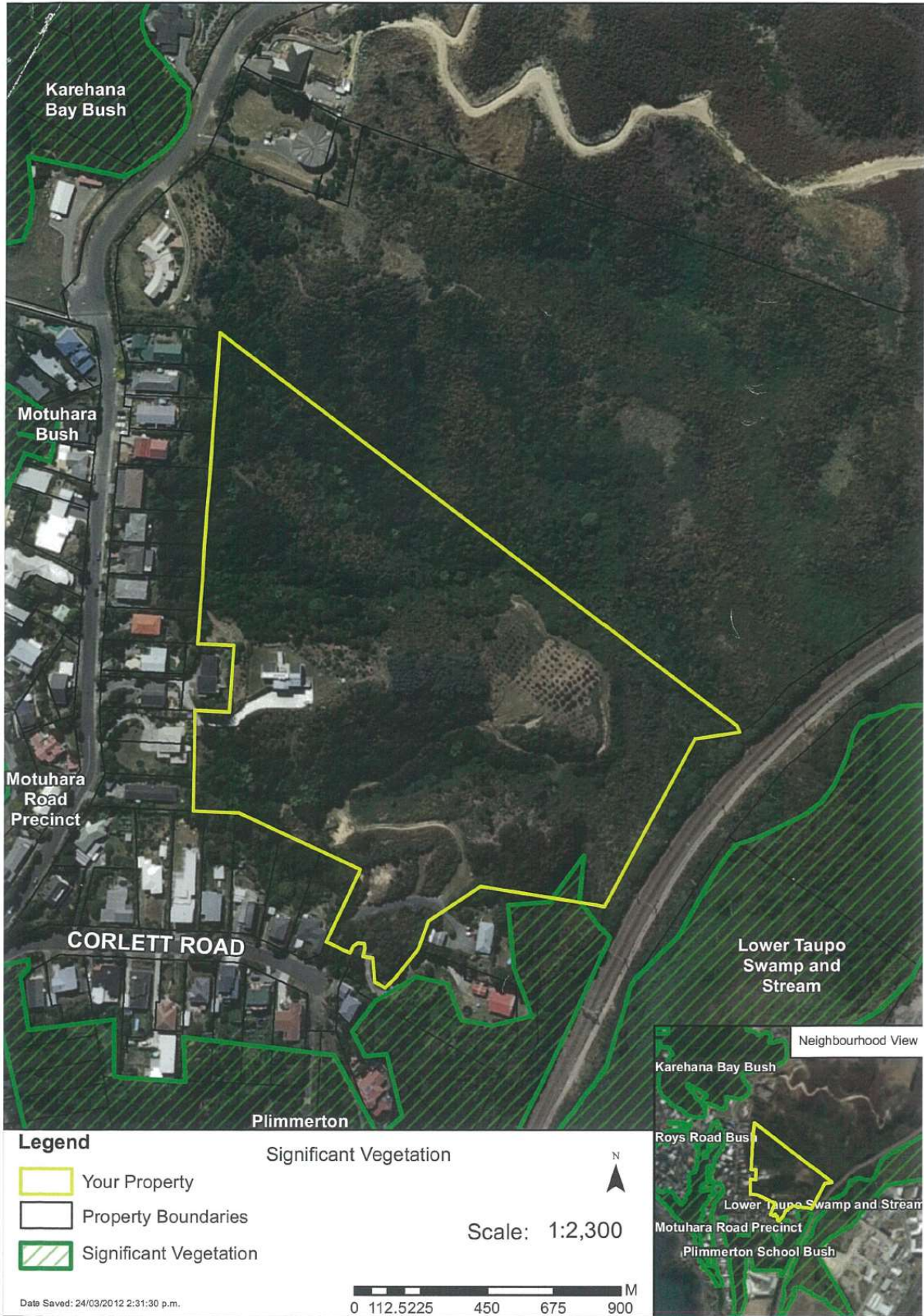
Yours Sincerely,

A handwritten signature in blue ink, appearing to read "mmuspratt".

Matt Muspratt  
Senior Policy Analyst

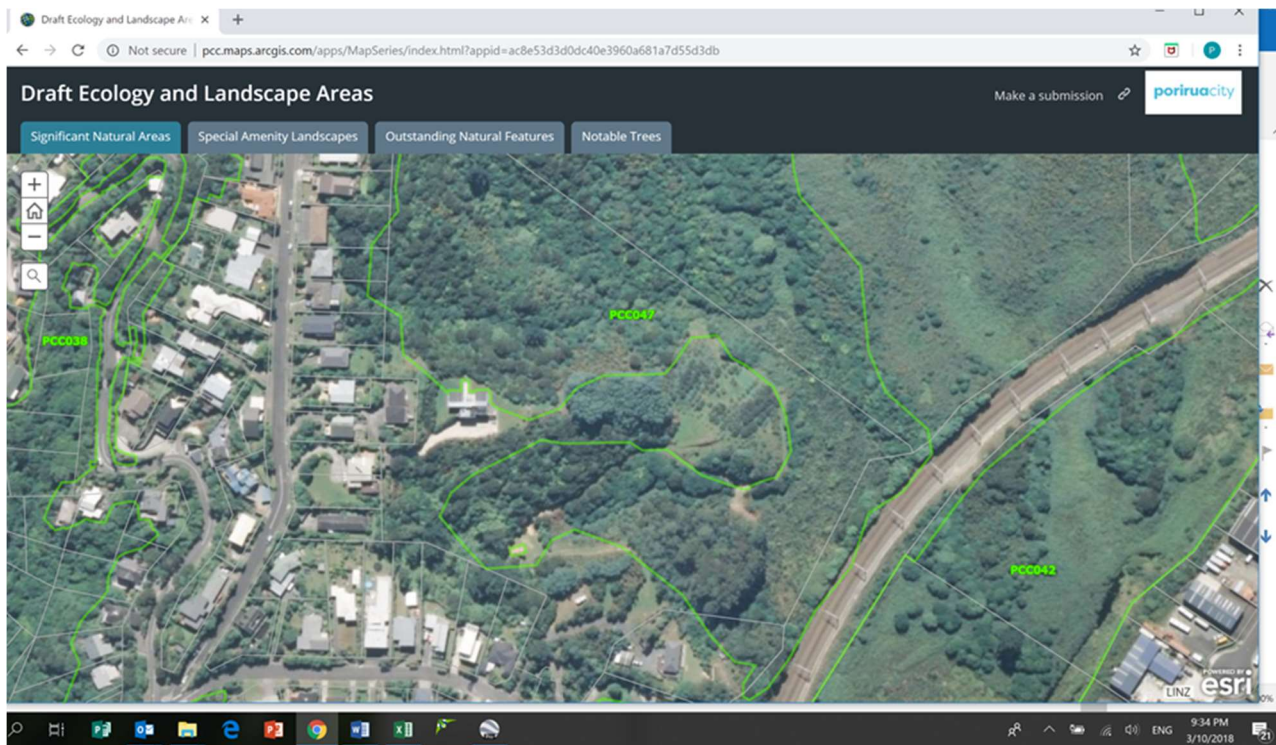
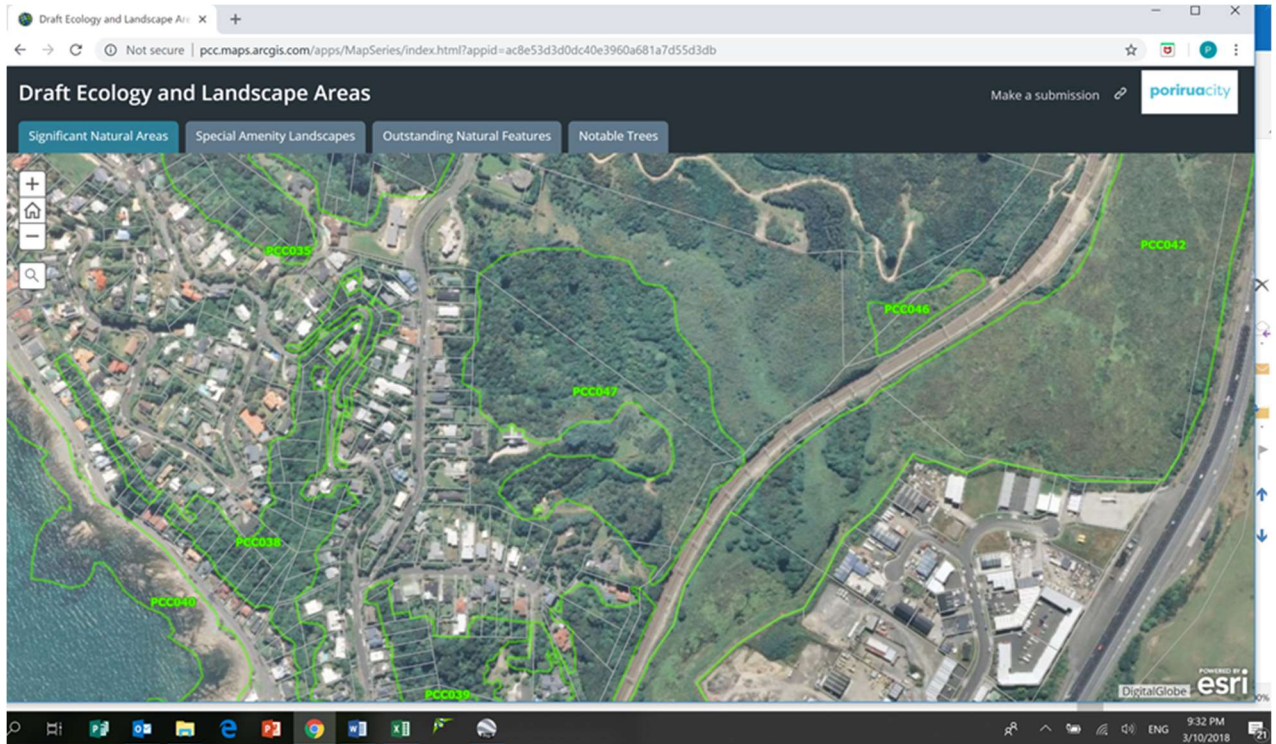
**Description:**

Low podocarp-broadleaved forest on prominent hillslope behind Plimmerton School. Canopy dominated by kanuka and ngaio with emergent kowhai, totara and poplars.





Annex 2. PCC SNA identified in 2017/2018. (Screen shot 5/10/2018)



**Correspondence between  
Council and submitter which  
forms part of this submission**



**Louise White**

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**From:** Paul Botha <paul@roaring40s.co.nz>  
**Sent:** Thursday, 19 November 2020 11:03 AM  
**To:** dpreview  
**Subject:** [EXTERNAL] RE: Submission on Proposed District Plan

**Categories:** Submission on PDP

Hi there

In response to the 3 outstanding matters:

1. **I could not** gain advantage in trade competition through this submission.
2. **I am** directly affected by an effect of the subject matter of the submission.
3. **I will** consider presenting a joint case with other submitters at a hearing.

Kind regards  
Paul

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**From:** dpreview <dpreview@porirua.govt.nz>  
**Sent:** Thursday, 19 November 2020 10:54 AM  
**To:** Paul Botha <paul@roaring40s.co.nz>; dpreview <dpreview@porirua.govt.nz>  
**Subject:** RE: Submission on Proposed District Plan

Dear Paul,

Thank you for your submission on the Porirua Proposed District Plan.

To enable us to accept your submission, we respectfully ask you to please respond to the outstanding matters below via return email so that we can lodge your submission

**Outstanding matters to be addressed**

1. 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:

2. 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.

3. 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)

Thank you

Ngā mihi,

Louise White

Intermediate Policy Planner  
Kaihanga Kaupapahere Māhuri



Tel: 04 910 5490  
[porirucity.govt.nz](http://porirucity.govt.nz)

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**From:** Paul Botha <[paul@roaring40s.co.nz](mailto:paul@roaring40s.co.nz)>  
**Sent:** Thursday, 19 November 2020 10:49 AM  
**To:** dpreview <[dpreview@porirucity.govt.nz](mailto:dpreview@porirucity.govt.nz)>  
**Subject:** [EXTERNAL] Submission on Proposed District Plan

Good morning

Attached is a written submission on the PDP. I can also confirm that I wish to be heard in support of my submission.

Kind regards  
Paul

**Paul Botha**

**Mail:** 10A The Track, Plimmerton, Porirua, 5026, New Zealand  
**Mob:** +64 21 897158  
**Email:** [paul@roaring40s.co.nz](mailto:paul@roaring40s.co.nz)

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