

IN THE MATTER OF the Resource Management Act 1991

And

IN THE MATTER OF A joint hearing of applications lodged by Winstone Aggregates Limited with Wellington Regional Council, Porirua City Council and Hutt City Council for land use consents and discharge permits to enable the establishment and operation of a cleanfill on land accessed from State Highway 58 (referred to as the 'Dry Creek Replacement Cleanfill'):
WRC Reference WGN130115 [32017] - [32020];
PCC Reference RC 6425 – LU0186/12;
HCC Reference RM120381

Further Comment by Pauatahanui Resident's Association

Road Safety Audit

1. We have read the Road Safety Audit, dated 5 December 2013, and agree with the conclusions reached in this report.
2. We note with concern the significant inconsistencies between NZTA's original recommendations in support of Winstone's proposal and the subsequent disclosure of serious issues by this audit.
3. We consider that the Road Safety Audit report supports the evidence provided by the NZ Police to the hearing panel, which is also consistent with the view of local residents who know this stretch of the highway well and believe that the road traffic issues involved in this proposal are unsafe.
4. We agree with the audit findings that the proposed access onto State Highway 58 presents moderate to serious safety risks to road users.
5. We believe that any level of safety risk that is more than minor is unacceptable.

Supplementary Evidence

6. We note in the Porirua City Council Land Use Consent Reference RC 6425 – LU0186/12, dated 6 December, under Traffic, the statement, consistent with all previous information presented, that "During the following hours there shall be a maximum of 40 truck movements (per hour) to the site and 40 truck movements (per hour) from the site"
7. It was therefore with concern that we read the Supplementary Statement of Evidence of Mark Georgeson on Behalf of Winstone Aggregates (Traffic And Transportation), dated 2 December 2013. In his Supplementary Statement of Evidence Mr Georgeson states, more than once, that the number of vehicle movements will be 5-7 trucks per hour (for example 2.3 However, I make the point at Section 8 of this evidence that, since cleanfill volumes will average just 5 to 7 trucks per hour, there will be a very small number of required merges, substantially less than occurs in relation to the existing passing lane.")
8. We are very concerned by the apparent minimising of impacts put forward by Mr Georgeson, given the large discrepancy between the truck movements being sought and those that Mr Georgeson suggests.

9. We appreciate that the traffic volumes stated in the Resource Consent Application are maximums. However we believe that, given the probability and serious nature of any potential “miscalculations” with regard to safe road use plus the length of time for which the consent is being sought (decades rather than months), that any decisions on traffic safety should be based on maximum, rather than minimum, volumes.

Conclusion

10. In our original submission PRA considered that the traffic management plan did not adequately address all the potential traffic safety risks associated with the proposed activity and sought further investigation into these risks.
11. PRA considers that the Road Safety Audit has provided the further investigation that we sought. As a result of the significant and serious road safety risks outlined in the Road Safety Audit report it is PRA's belief that these cannot be adequately mitigated or remedied and that on this basis the resource consent application should be declined.



Diane Strugnell
on behalf of
Pauatahanui Residents Association

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