

B Jackson Notes re submission on Resource Consent Application RC13360L

Traffic

There seem to be several estimates of the likely number of trucks per day visiting and leaving the site.

Harrison Transportation Traffic Report of September 2023 Table 14 says 87 single trucks and 44 truck and trailers per day with full development of the site. However, Bruce Harrison's document of 18 June 2024 Clause 7.23 predicts 288 veh/day for the site, 49 of which are heavy vehicles.

Bruce Harrison's Statement of Evidence 25 June 2024, Clause 6.5 refers to 101 vehicles turning into the site at peak hour and 99 vehicles turning out of the site at peak hour. It doesn't say how many are big trucks. Presumably the number of cars will be small, as the number of site staff seems to be quite low - assumed to be equipment operators and support staff. Dr Harris (5.6) refers to support staff being in the existing house or other existing building.

I would expect the applicant to be able to give the best estimate of traffic generation, especially trucks based on their current business activities. This would need to take into account the need for two trips per container movement, one for the truck to come to the site, and one to leave with the container (or, to leave the site with the container and then return).

The Momentum Planning and Design Document from Sept. 2023 Page 22 Clause 3.5 states that the largest truck will be a B-train truck and trailer which the Waka Kotahi website shows to be a tractor unit, a first semi-trailer and a second semi-trailer, with a maximum length of 20 metres.

Regardless of the actual number, Te Puna Road is simply not suitable for such traffic. The concept of it being a typical quiet country road with a few entrances to farms is not correct.

Between Armstrong Road and Te Puna Station Road, a distance of just over 1km, there are 33 driveways into private property and 5 orchard accessways. There are 45 letterboxes. There have been 9 vehicle crashes over the last few years – refer sketch BJ1. Apart from the normal comings and goings of the residents, many of the driveways provide access to avocado or kiwifruit orchards, which at times need equipment access for spraying, picking and pruning and for shelter-belt trimming. The sealed shoulders are generally only 900mm wide.

The submissions from Ken Harris (5.3a) refers to full containers, and Dr Margaret Harris (5.3) refers to filling and emptying containers on the site, so the concept of just handling empty containers is not correct. This raises some queries re traffic: How many containers would be filled or emptied per day, how many trucks of what size would be needed to bring the new contents to the site or to take the removed contents away? How many containers of kiwifruit constitute a 'Job Lot' referred to by Dr Harris (5.7)?

A particular issue is the steepness and sharpness of the turn from Te Puna Station Road to Te Puna Road. As it is a compulsory stop the loaded trucks leaving the site have move very slowly from stand-still to avoid losing traction, especially if the containers are full, and especially when the road is wet. They then continue to move very slowly until they reach the top of the hill. Attachment 4, the Harrison Transport Technical Memo 17 April 2024, Page 325 has contour lines that show that the road rises about 4.5 metres through the length of the corner, and then an additional 8 metres to the top of the hill on Te Puna Road, and there doesn't look to be any practical way of reducing this. Several times we have seen big trucks start moving when a vehicle is approaching from the north,

and are dependent on the vehicle slowing down to let them in. The risk of an accident obviously increases with increasing truck numbers, especially when carrying full containers.

Another concern is the number of trucks carrying fill to the site 7 months a year for two years. Clause 10.11 of Bruce Harrison's Statement of Evidence 25 June 2024 estimates up to 103 trucks per day with 13 per hour i.e. one every 5 minutes!

Overall, I submit that Te Puna Road is simply not suitable for use by the heavy traffic that would be generated if the application was to be approved.

Hours of operation

Dr Harris (4.4) states that the operations are only during daylight hours, and they are not proposing outdoor lighting. Momentum Planning & Design Application for Land Use Consent Sept. 2023 Clause 3.2 refers to proposed maximum operating hours 7.00am to 6.30pm Monday to Saturday. The Opening Legal Submissions 5 July 2024 Legal Document P51 Clause 20 states that the operating hours will be limited to 7.00am to 10.00pm Monday to Saturday and 7.00am to 6.00pm Sundays. Which is correct? Obviously the longer the operating hours the more the noise disturbance and the more the Te Puna Road traffic problems.

Noise

As noted in my submission our property is very quiet and peaceful and the noise level is usually very low, as could be verified by the people who came to visit early on in these proceedings. As noted I have roughly estimated it to be in the order of 20dBA, much lower than the predicted 38dBA shown on Page 25 of the Operational Noise Report. This is because of our distance from Te Puna Road (about 200 metres at the closest), and because there is a small ridge of land between the road and our boundary. I think part of the problem could be that the 38dBA is an average over 15 minutes, so includes noises such as trains passing, whereas in reality we hear the train when it passes and then revert to the normal low noise level i.e we don't react to an average noise level. This means that the predicted operational noise level on Page 26 of 49.2dBA would be very intrusive indeed. The night-time prediction of 40dBA would be even worse. I note that the Submitters Location Map shows our property as being beside the road (see BJ2) but am not sure if the acoustic analysis was based on this error.

Other aspects of the application

As noted, I am dependent on Council to ensure that all requirements relating to Environmental, Geotechnical, Stormwater, Groundwater and Cultural Issues are fully assessed and evaluated in responding to the application.