Speaking Notes - Brian Jones

Hutt City Proposed District Plan – Benmore Crescent

My background is in Aquatic Biosecurity and Risk Assessments at the inter-government level. We have lived in Manor Park since 2013. My Wife and I are opposed the proposed rezoning because it will generate adverse effects on our local environment.

I note that the District Plan Review Committee unanimously and explicitly directed to **retain and apply the General Rural Zone** to 30 Benmore Crescent rather than changing it to a **General Industrial zone**. However, it seems that the rezoning proposal is back on the table.

The proposed change in zoning to a **General Industrial Zone**, a zone that is explicitly designed to handle activities that produce high noise, heavy freight movement, and potential discharges is problematic. Normally, to protect the community, councils use spatial buffers but in this case, the only "buffer" is the railway line and the developers and Council now (at the last minute) wish to rezone that to industrial too, no doubt to increase the "buffer" and affect the consequent building offsets.

The Likelihood is high that activities on an industrial zone site will increase the potential for odour, noise, traffic generation, access, safety and light pollution at night, presenting a very real health risk to residents throughout the Hutt valley **and result in substantial ongoing cost and reputational damage to the Council** through complaints, environmental issues, infrastructure issues and potentially political fallout should a bad environmental incident occur. The probability of the latter, especially fire, is very high.

With this background it is hard to see that any proper "Risk Assessment" has been undertaken by the council officers to protect the Council and Ratepayers from the costs the rezoning will incur. Their desire to find industrial land in Lower Hutt has blinded them to the risks, perhaps.

1) Noise. For heavy industry, noise will inevitably be an issue. The land is within 35 m of established residential housing. The Noise information submitted suggests that the noise from Kiwirail at night may be as high as 55Db and that added noise from industrial activities will breach the maximum night time noise level. The developers argue on the one hand that the noise from the highway would prohibit a "residential" zoning for the Benmore Industrial Park, but then propose to put a potentially noisy activity next to Mary Huse Grove? The sound measurements were made before all the vegetation was removed and replaced with what is effectively a concrete sound board.
Consider the industrial noise problems that involved the **Farrah's Bread factory** in Upper Hutt. Neighbours lodged over 200 complaints over 18 months regarding the overnight factory noise.

The cost to the Council was not negligible. An independent review later found the council took far too long to resolve the issue. The council defended its cautious timeline by noting that they were concerned at triggered expensive, prolonged legal counter-actions from the business.

2) Smells are a high likelihood from an industrial setting, whether from waste or chemicals. In the case of the **Seaview Sewerage treatment plant** the Greater Wellington Regional Council (GWRC), issued over $70,000 in fines and numerous infringement notices to Wellington Water, Veolia, and both the Hutt and Upper Hutt City Councils for breaching Resource Management Act (RMA) conditions by discharging offensive odours past the property boundary. A similar relevant case is the **Spicer Landfill** in the Porirua Basin, managed by Porirua City Council. This site resulted in thousands of complaints from nearby residential areas. For Porirua, the odour issues became legally unmanageable leading to further fines from the Regional Council and closure of the landfill.

3) Fires. A fire on the site is inevitable. According to data collected by Fire and Emergency New Zealand (FENZ), there are **approximately 3,400 industrial fires across the country every single year.** Waste Management New Zealand has recorded 75 battery-related fires across its vehicles and facilities in the last 12 months. The only question for Manor Park is the potential scale of the blaze.

Fighting a large industrial fire in New Zealand, at the required rate of 200 L/s, will consume 12,000 litres of water every minute, or 720,000 litres per hour. There is some concern that the water supply in Manor Park would not be able to cope.

However, for the council, the immediate crisis is where that water goes once it leaves the fire hoses. The Benmore Crescent site sits over Dry Creek and is directly adjacent to the **Hutt River** (Te Awa Kairangi). which is the environmental and drinking water lifeblood of the valley.

3A) The Runoff Trap: Industrial sites often house heavy metals, fuels, paints, or commercial chemicals. Waste from residential rubbish is up to 14% human faecal material. When fire crews douse a blaze, the water absorbs these contaminants and enters the stormwater network.
Councils are heavily penalised by regional environmental watchdogs if they fail to contain this toxic effluent, But because the Manor Park site lacks the industrial stormwater interceptors found in established heavy-industrial parks, this highly toxic water would enter Dry Creek or the Hutt River via the Kiwirail service track and potentially contaminate the river and the Waiwhetu aquifer which supplies about 40% of the public freshwater supply for Lower Hutt and Wellington City. Water from the Hutt river enters the aquifer south of Taita Gorge. This would trigger an ecological emergency, threatening down-river recreational areas and trigger urgent contamination protocols for regional water management.

Why would the Council put an industrial site in the headwaters of the river you are currently spending $1.5 billion through the "Te Wai Takamori o Te Awa Kairangi "Riverlink" project?.

3B) Smoke and Health Risks: Because of Manor Park's unique, isolated geography, a large industrial fire at this specific site would almost always trigger severe hazardous air quality protocols due to toxic smoke and fumes. the fallout would look vastly different—and much more severe—than a fire in a flat, heavy industrial zone like Seaview or Gracefield. the consequences would be catastrophic for the immediate area.

Manor Park is nestled in a distinct valley bowl alongside the Hutt River, flanked by high ridges, East and West. Unlike open coastal areas where wind rapidly disperses toxic smoke, a fire at Benmore Crescent would see heavy chemical smoke trapped by the surrounding hills. If the fire occurred during a calm evening or an atmospheric inversion, a dense blanket of toxic smoke—laced with plastics, heavy metals, or hazardous particles depending on the facility's inventory—would settle directly over the Manor Park residential community, including the Dementia hospital. Such inversions, and local fog have been observed by residents. In the case of Manor Park, those toxic fumes and smoke would shut down the rail link to upper Hutt, State Highway 2 and 58 and block access to Manor Park.

Depending on the wind direction, the plume could be funnelled directly down the Hutt Valley toward Stokes Valley and Pomare, or pushed north toward Silverstream, forcing widespread, multi-suburb shelter-in-place or evacuation orders and likely closing Eastern Hutt Road, effectively cutting all access to Upper Hutt.

3C) Logistical Nightmare: Manor Park's infrastructure is notoriously restricted, with **Manor Park Road and its narrow railway crossing access** acting as the sole vehicle access point in and out of the entire suburb, connecting it to State Highway 2 at the interchange with SH2 and SH58. In rush hour the interchange is heavily congested northbound with the northbound on ramp traffic banked up to the top of the hill on SH58

Fire and Emergency NZ (FENZ) would have to rush heavy fire appliances, and specialised HazMat units to the scene. Because the roads are narrow, emergency vehicles heading toward Benmore Crescent would completely block the only exit route for residents. If a wind shift required the immediate evacuation of Manor Park's residential streets, hundreds of families would find themselves trapped in gridlock on a single road, unable to leave while emergency crews struggle to get in.

In summary Because the community have actively fought to retain the **General Rural Zone** for Benmore Crescent precisely to prevent this type of intensive and potentially toxic land use, a disaster of this scale would trigger a political crisis. the council would face intense legal scrutiny, and potential independent inquiries, for failing to protect a vulnerable residential pocket from **an entirely predictable spatial hazard.**