

I hereby give notice that a hearing by commissioners will be held on:

**Date:** Monday 27 to Thursday 30 May and  
Tuesday 4 to Friday 7 June 2024  
(Note: not all days may be required)

**Time:** 9.30am

**Meeting Room:** Council Chamber

**Venue:** Level 1, West Annex,  
31-33 Manukau Station Road, Manukau

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**TWO NOTICES OF REQUIREMENT FOR THE  
TAKAANINI LEVEL CROSSING PROJECT (TLC) AND  
FOUR NOTICES OF REQUIREMENT FOR THE SOUTH  
FREQUENT TRANSIT NETWORK (FTN) PROJECT**

**HEARING REPORT – VOLUME ONE**

**SOUTHERN FREQUENT TRANSIT NETWORK (FTN)**

- NOR 1 GREAT SOUTH ROAD FTN UPGRADE
- NOR 2 GREAT SOUTH ROAD FTN UPGRADE  
(DRURY SECTION)
- NOR 3 TAKAANINI FTN – WEYMOUTH, ALFRISTON  
AND GREAT SOUTH ROAD UPGRADES
- NOR 4 TAKAANINI FTN – PORCHESTER ROAD AND  
POPES ROAD UPGRADES

**TE TUPU NGATAHI - SUPPORTING GROWTH  
ALLIANCE**

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**Note:** The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

## **COMMISSIONERS**

**Chairperson  
Commissioners**

**Dave Serjeant  
Nigel Mark-Brown  
Basil Morrison**

**Bevan Donovan  
KAITOHUTOHU WHAKAWĀTANGA  
HEARINGS ADVISOR**

Telephone: 09 890 8056 or 021 325 837  
Email: [bevan.donovan@aucklandcouncil.govt.nz](mailto:bevan.donovan@aucklandcouncil.govt.nz)  
Website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

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## **WHAT HAPPENS AT A HEARING**

### **Te Reo Māori and Sign Language Interpretation**

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

### **Hearing Schedule**

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

### **Cross Examination**

No cross examination by the requiring authority or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the requiring authority or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

### **The Hearing Procedure**

The usual procedure for a hearing is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- The Requiring Authority (the applicant) will be called upon to present their case. The Requiring Authority may be represented by legal counsel or consultants and may call witnesses in support of the application. After the Requiring Authority has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
  - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
  - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The **requiring authority** or their representative then has the right to summarise the application and reply to matters raised. Hearing panel members may ask further questions. The requiring authority's reply may be provided in writing after the hearing has adjourned.
- **The chairperson** will outline the next steps in the process and adjourn or close the hearing.
- The hearing panel will make a recommendation to the Requiring Authority. The Requiring Authority then has 30 working days to make a decision and inform council of that decision. You will be informed in writing of the Requiring Authority's decision, the reasons for it and what your appeal rights are.

**SIX NOTIFIED NOTICES OF REQUIREMENT TO THE AUCKLAND COUNCIL UNITARY PLAN BY TE TUPU NGATAHI - SUPPORTING GROWTH ALLIANCE**

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Cheryl Cleary, Reporting officer (Southern Transit Network project)

Reporting on four Notices of Requirement for the South Frequent Transit Network project

**REQUIRING AUTHORITY:** TE TUPU NGATAHI - SUPPORTING GROWTH ALLIANCE

**South Frequent Transit Network (FTN)**

**NOR1 – GREAT SOUTH ROAD FTN UPGRADE**

Notice of requirement lodged by Auckland Transport for upgrades to parts of Great South Road between Manukau and Drury to provide a multi-modal transport corridor that will accommodate bus priority measures, active mode facilities (i.e. walking and cycling facilities), intersection upgrades, replacement of the existing Otūwairoa / Slippery Creek bridge, and stormwater management.

**NOR2 – GREAT SOUTH ROAD UPGRADE (DRURY SECTION)**

Notice of requirement lodged by Auckland Transport for upgrades to Great South Road between Waihoehoe Road and the State Highway 1 Drury Interchange to provide a multi-modal transport corridor that will accommodate general traffic lanes, active mode facilities (i.e. walking and cycling facilities) intersection upgrades, replacement of the existing Hingaia Stream bridge, and stormwater management.

**NOR3 – TAKAANINI FTN – WEYMOUTH, ALFRISTON, AND GREAT SOUTH ROAD UPGRADES**

Notice of requirement lodged by Auckland Transport for Upgrades to Weymouth and Alfriston Roads between Selwyn Road / Rogers Road and Saralee Drive; and Great South Road between Halver Road and Myers Road to accommodate bus priority measures, general traffic lanes, active mode facilities (i.e. walking and cycling facilities), intersection upgrades, proposed closure of the Beaumonts Way intersection with Weymouth Road, replacement of existing bridges along Weymouth Road over the North Island Main Trunk and Alfriston Road over State Highway 1, and stormwater management.

**NOR4 – TAKAANINI FTN – PORCHESTER AND POPES ROAD UPGRADES**

Notice of requirement lodged by Auckland Transport for upgrades to Porchester Road between Alfriston Road and Walters Road; and to Popes Road between Takanini School Road and Porchester Road to accommodate general traffic lanes, active mode facilities (i.e. walking and cycling facilities), and intersection upgrades.

**SUBMITTERS SOUTH FREQUENT TRANSIT NETWORK (FTN)- NOR1 - GREAT SOUTH ROAD FTN UPGRADE:**

Page 23	Johnathan Hong
Page 27	Binay
Page 29	Chander Investment Trust
Page 32	Iqbal Singh
Page 34	Dene Worsley Bowmar Margaret Anne Bowmar Judith Louise Tompsett
Page 37	Fortune Building Management Ltd
Page 224	CNS Healthcare
Page 226	SNP Limited
Page 228	Wendy Gladys Wells
Page 230	Bronwyn Brown
Page 237	TRP Brown and B Brown
Page 243	Telecommunication Submitters
Page 257	Marencia du Plessis
Page 259	Carl Dean Howe
Page 261	Bunnings Ltd
Page 264	Shamini Umasuthan
Page 266	Pathmavatheey Govender
Page 268	Davinder Singh
Page 272	Heritage New Zealand Pouhere Taonga
Page 278	Restaurant Brands Limited
Page 284	Hansaben Patel
Page 289	Meenakshi Goyal

Page 294	Esskay Holdings Limited
Page 296	Auckland Council - Parks and Community Facilities
Page 298	Te Tāhuhu o te Mātauranga Ministry of Education
Page 305	Counties Energy Limited
Page 308	Watercare Services Limited
Page 314	Z Energy Limited
Page 327	Kāinga Ora Homes and Communities
Page 342	Manurewa Business Association Incorporated
Page 346	Southmall Manurewa

**SUBMITTERS SOUTH FREQUENT TRANSIT NETWORK (FTN)- NOR2 - GREAT SOUTH ROAD UPGRADE (DRURY SECTION):**

Page 352	Broshmik Investments Limited and Willian Rudsits
Page 355	Dunford Family Trust, David Dunford and Jayne Dunford
Page 358	Blue Snow (2015) Limited
Page 371	Telecommunication Submitters
Page 385	Andromeda Miers Trust Partnership
Page 387	Active Electrical Suppliers (Drury)
Page 389	Kiwi Property No.2 Limited
Page 394	Carter Holt Harvey Property Limited
Page 399	KiwiRail Holdings Limited
Page 404	Auckland Council - Parks and Community Facilities
Page 406	Te Tāhuhu o te Mātauranga Ministry of Education
Page 413	Counties Energy Limited
Page 416	Watercare Services Limited
Page 422	Kāinga Ora Homes and Communities
Page 437	Drury Tires / Drury Hills Trust
Page 439	David Hay

**SUBMITTERS SOUTH FREQUENT TRANSIT NETWORK (FTN)- NOR3 - TAKAANINI FTN – WEYMOUTH, ALFRISTON, AND GREAT SOUTH ROAD UPGRADES:**

Page 442	Rajnesh Jai Singh
Page 444	Super Liquor Manurewa
Page 446	Christopher Digby and Patricia Margaret Ward
Page 453	Kamal Vasudev Matta
Page 455	Mohammed David Thalari
Page 457	Mayvan Holdings Ltd
Page 459	Wassil Chiba
Page 461	ChanLong Lim

Page 463	Prem Chand and Savita Chand
Page 465	Awdisho Khamis and 30 Signatories
Page 476	George Khamis
Page 478	Werner Andreas van Schalkwyk
Page 480	George Khamis and 30 Signatories
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Page 498	McDonald's Restaurants NZ Limited
Page 506	Manurewa Business Association Incorporated
Page 510	Southmall Manurewa
Page 516	Pravin Umariya and Praveena Umariya
Page 519	Harpartap Singh Kalra and Anjana Kalra
Page 527	Wai Ming Chan
Page 529	Mahendran Rama
Page 531	Nitinkumar Patel
Page 533	Mahendra Kumar
Page 535	Orient Pacific Trust Ltd
Page 537	Accessible Properties Limited
Page 551	The National Trading Company of New Zealand
Page 556	Restaurant Brands Limited
Page 562	Fire and Emergency New Zealand
Page 566	Tibetian Residential Limited
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Page 595	Watercare Services Limited
Page 601	Z Energy Limited
Page 614	Kāinga Ora Homes and Communities
Page 629	Nilkunt Trustee Company Limited

**SUBMITTERS SOUTH FREQUENT TRANSIT NETWORK (FTN)- NOR4 - TAKAANINI FTN – PORCHESTER AND POPES ROAD UPGRADES:**

Page 634	8 Bledisloe Limited
Page 636	Hemant Hemant
Page 638	George Khamis
Page 640	Awdisho Khamis
Page 643	Dianne and Neville Smith
Page 645	Continuous Spouting Auckland
Page 648	Graeme & Anna Goldring
Page 652	Amrik Singh Grewal and Simranjeet Kaur Grewal
Page 655	Hussain Rahimi
Page 657	Akalmurat Singh Hora
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Page 705	Alda Investments Limited
Page 787	D E Nakhle Investment Trust
Page 869	Simon and Julie Fleming
Page 871	Pritesh Singh
Page 873	Mimico Properties Limited
Page 877	Danielle Evans
Page 879	Te Tāhuhu o te Mātauranga Ministry of Education
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Page 892	Kāinga Ora Homes and Communities
Page 907	Manpreet Kaur

**Notices of requirement under section 168  
of the RMA by Auckland Transport for  
designations for the South Frequent  
Transit Network**



**To:** Hearing Commissioners

**From:** Cheryl Cleary, Consultant Planner

**Report date:** 12 March 2024

**Scheduled hearing dates:** 27 to 30 May and 4 to 7 June 2024

(Note: The hearing dates are for four Notices of Requirement for the South FTN and two Notices of Requirement for the Takaanini Level Crossings. Not all of the days may be required)

**Notes:**

This report sets out the advice of the reporting planner in relation to the South FTN Notice of Requirements.

This report has yet to be considered by the Hearing Commissioners delegated by Auckland Council (the council) to make a recommendation to the requiring authority.

The recommendations in this report are not the decisions on the notices of requirement.

A decision on the notices of requirement will be made by the requiring authority after it has considered the Hearing Commissioners' recommendations, subsequent to the Hearing Commissioners having considered the notice of requirement and heard the requiring authority and submitters.

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## Summary

Requiring authority	Auckland Transport	
Notice of requirement references	<ul style="list-style-type: none"> <li>• South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)</li> <li>• South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)</li> <li>• South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)</li> <li>• South Frequent Transit Network: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)</li> </ul>	
Resource consent applications	No resource consent applications have been lodged by the requiring authority for this project.	
Reporting planner	Cheryl Cleary, Consultant Planner, Director, Cleary & Associates Ltd	
Site address	Refer to Attachment B of the Form 18 documents.	
Lodgement date	13 October 2023	
Notification date	16 November 2023	
Submissions close date	14 December 2023	
Number of submissions received	<b>NoR</b>	<b>Submissions</b>
	South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)	31
	South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)	16
	South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)	40
	South Frequent Transit Network: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)	25
	<b>Total submissions</b>	<b>112</b>

Report prepared by:	Cheryl Cleary Consultant Planner	
Date:	12 March 2024	
Reviewed and approved for release by:	Craig Cairncross Team Leader Central South Plans and Places	
Date:	12 March 2024	

## Abbreviations

AEE	South Frequent Transit Network Assessment of Effects on the Environment, October 2023, Version 1, prepared by Te Tupu Ngātahi Supporting Growth
Active Mode	Walking and cycling
AT	Auckland Transport
AUP	Auckland Unitary Plan (Operative in Part)
BPO	Best Practicable Option
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CTMP	Construction Traffic Management Plan
HHMP	Historic Heritage Management Plan
NoRs	Notices of Requirement
FTN	Frequent Transit Network
FULSS	Auckland Future Urban Land Supply (2017)
FTN	Frequent Transit Network. FTN services are defined in AT's Regional Public Transport Plan (RPTP) as bus routes operating at least every 15 minutes between 7am-7pm, 7 days-a-week, often supported by priority measures such as bus or transit lanes.
HNZPT	Heritage New Zealand Pouhere Taonga
NIMT	North Island Main Trunk railway
NoR 1	South Frequent Transit Network: Great South Road FTN Upgrade
NoR 2	South Frequent Transit Network: Great South Road (Drury Section)
NoR 3	South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades

NoR 4	South Frequent Transit Network: Takaanini FTN – Porchester and Popes Road Upgrades
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-UD	National Policy Statement on Urban Development 2020
NPS-HPL	National Policy Statement on Highly Productive Land 2022
NUMP	Network Utilities Management Plan
OPW	Outline plan of works
Proposed Conditions	Attachment C - Proposed Conditions for the Designation, Form 18s for the South FTN NoRs
Project	The South FTN authorised by the South FTN NoRs
RA	Requiring Authority
Requiring Authority	Auckland Transport
RTC	Rapid Transit Corridor
RMA	Resource Management Act 1991 and all amendments
the Council, Council	Auckland Council
SCEMP	Stakeholder Communication and Engagement Management Plan
SGA	Te Tupu Ngātahi Supporting Growth Alliance, a collaboration between Auckland Transport and Waka Kotahi New Zealand Transport Agency partnered with Auckland Council, Mana Whenua and KiwiRail Holdings Ltd
South FTN NoRs	South Frequent Transit Network Notices of Requirement, which consists of four notices of requirement: (i) South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1) (ii) South Frequent Transit Network: Great South Road (Drury Section) (NoR 2) (iii) South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3); and (iv) South Frequent Transit Network: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4)
TMP	Tree Management Plan
ULDMP	Urban and Landscape Design Management Plan

### Terminology

‘Takaanini’ (with double vowels) is used throughout this report except where ‘Takanini’ (single vowel) is the official existing place name (e.g., Takanini School Road).

Documents lodged with the South FTN NoRs are referred to as the Requiring Authority’s documents.

# 1 Introduction

## 1.1 Report Author

### Qualifications and Relevant Experience

My name is Cheryl Cleary. I am an independent planning and resource management consultant. I have a Bachelor of Town Planning, a Bachelor of Arts (Anthropology) and a Master of Arts (1<sup>st</sup> Hons) in Political Studies, all University of Auckland. I am a full member of the New Zealand Planning Institute. I have accreditation as a hearings commissioner in the Making Good Decisions programme.

I have approximately 35 years experience in planning in New Zealand and overseas, including experience in local government in Auckland (at the former Manukau City Council and the former North Shore City Council) and with a number private sector consulting firms. I am the director and planning consultant of the firm Cleary & Associates Ltd.

My experience with notices of requirement and designations includes the preparation and the assessment of notices of requirement and notices of alteration to designation. Previously, working in local government, I led teams in the assessment of notices of requirement, notices of alteration to designations, and Outline Plans, and in the preparation of s.42A reports regarding submissions on designations in district plan reviews.

I have also been responsible for leading the design and implementation of consultation and engagement plans for local government and utility operator clients for a wide variety of projects, and have extensive experience in engagement with Mana Whenua, stakeholders and the public. In preparing notices of requirement for clients, I have led and participated in consultation and engagement with directly affected owners and occupiers, Mana Whenua, and stakeholders, including discussions regarding conditions to mitigate adverse effects and compensation matters.

I am familiar with the Manurewa, Takaanini, Papakura and Drury localities. I carried out a site visit to the locality of the South FTN NoRs on 23 January 2024.

### Involvement in this matter

I have been engaged by Auckland Council to provide planning assistance in the processing and assessment of the South FTN NoRs.

My work on the South FTN NoRs commenced pre-lodgement with providing comment in July 2023 on the proposed timetable for the processing of the NoRs working towards the hearing date commencing 27 May 2024.

I attended the one hour briefing conducted by SGA planners at a pre-lodgement briefing held on 14 September 2023 and attended a bus tour of the locality of the NoRs conducted by SGA planners that same day.

I provided assistance to the Council in making comment on a 'soft-lodgement' of some parts of the South FTN NoRs and supporting assessments provided to Council by SGA. I assisted Council in the assessments of the lodged NoRs and making a section 92 request for further information. I have also attended fortnightly meetings with members of the SGA team and an Auckland Transport representative, together with Council staff, in which SGA have had the opportunity to ask questions and raise any concerns regarding the processing of the NoRs.

I attended a briefing run by SGA on the proposed conditions on 13 December 2023.

## **1.2 Code of conduct for Expert Witnesses**

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this planning report (being also expert evidence), and I agree to comply with it when giving any oral evidence during this hearing. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any information and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient information or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## **2 The Notices of Requirement**

### **2.1 South FTN Notices of Requirement**

Pursuant to section 168(2) of the RMA, Auckland Transport ('**AT**') as the Requiring Authority, has lodged four notices of requirement (**NoRs**) for four new designations in the Auckland Unitary Plan (Operative in Part) (**AUP:OP**) for the South Frequent Transit Network (**South FTN**). The South FTN NoRs have been prepared by Te Tupu Ngātahi Supporting Growth (SGA).

The South FTN NoRs are:

- South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)
- South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)
- South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)
- South Frequent Transit Network: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)

The South FTN NoRs seek the route protection for the South FTN for that portion of the proposed corridor upgrades that cannot be accommodated within the existing road reserve and require additional land.<sup>1</sup> The South FTN comprises a range of road upgrades including bus priority measures, new and upgraded active mode facilities, and intersection improvements along existing arterial road corridors in South Auckland. In particular, the proposed road upgrades provide for:

- (i) Operation of FTN bus services along Great South Road between Manukau and Drury (the Great South Road FTN route);
- (ii) Operation of FTN bus services along existing roads between Manurewa, Takaanini, and Papakura (the Takaanini FTN route); and
- (iii) Urbanisation of adjoining key connections to FTN routes – Popes Road (West), and the Drury section of Great South Road between Waihoehoe Road and State Highway 1 (SH1).

The South FTN NoRs (also collectively referred to as ‘**the Project**’) are described in Table 1 below.

**Table 1 Description of the South FTN NoR**

Notice	Project Name	Description <sup>2</sup>
NoR 1	Great South Road FTN Upgrade	<ul style="list-style-type: none"> <li>• NoR 1 is for a portion of works required to enable the South FTN – specifically, the operation of the Great South Road FTN route.</li> <li>• This includes the construction, operation, and maintenance of upgrades to Great South Road at eight locations between Manukau and Drury, to accommodate bus priority measures, general traffic lanes, walking and cycling facilities, as well as all associated works.</li> <li>• NoR 1 enables key intersection upgrades, replacement of the existing Otūwairoa / Slippery Creek bridge, and stormwater management devices.</li> </ul>
NoR 2	Great South Road (Drury Section)	<ul style="list-style-type: none"> <li>• NoR 2 is for a portion of works required to enable the South FTN – specifically, the construction, operation, and maintenance of upgrades to Great South Road between Waihoehoe Road and SH1 (a 520m section) to accommodate general traffic lanes, walking and cycling facilities, as well as all</li> </ul>

<sup>1</sup> Te Tupu Ngātahi Supporting Growth, South FTN Assessment of Environmental Effects, October 2023 (AEE), p1

<sup>2</sup> Source: ‘Summary’ section of Form 18 for South FTN NoRs, and Table 1-1 Summary of the proposed Project, AEE, p4.



Notice	Project Name	Description <sup>2</sup>
		<p>associated works.</p> <ul style="list-style-type: none"> <li>NoR 2 enables road widening to provide for four lanes, active mode facilities, replacement of the existing Hingaia Stream bridge, and stormwater management devices.</li> </ul>
NoR 3	Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades	<ul style="list-style-type: none"> <li>NoR 3 is for a portion of works required to enable the South FTN – specifically, the operation of the Great South Road and Takaanini FTN routes. This includes the construction, operation, and maintenance of upgrades to Weymouth and Alfriston Roads between Selwyn Road and Saralee Drive, and to Great South Road between Halver Road and Myers Road, to accommodate bus priority measures, general traffic lanes, walking and cycling facilities, as well as all associated works.</li> <li>NoR 3 enables replacement of existing bridges along Weymouth Road over the North Island Main Trunk railway (<b>NIMT</b>) and Alfriston Road over SH1, and stormwater management devices.</li> </ul>
NoR 4	Takaanini FTN – Porchester and Popes road Upgrades	<ul style="list-style-type: none"> <li>NoR 4 is for a portion of works required to enable the South FTN – specifically, the operation of the Takaanini FTN route and urbanisation of Popes Road West. This includes the construction, operation, and maintenance of upgrades to Porchester Road between Alfriston Road and Walters Road; and to Popes Road between Takanini School Road and east of Porchester Road to accommodate general traffic lanes, walking and cycling facilities, as well as all associated works.</li> <li>NoR 4 provides for urbanisation of both corridors – two traffic lanes, walking and cycling facilities, key intersection upgrades, and stormwater management devices.</li> </ul>

The elements of the South FTN NoRs may be summarised as:

- Bus Priority Measures
- 5km of two-way bus lanes and 7.7km of northbound bus lanes on Great South Road as part of the Great South Road FTN
- 1.7km of two-way bus lanes on Alfriston Road as part of the Takaanini FTN

- Active mode improvements throughout the project
- Intersection improvements
  - Upgrades to eight key intersections on Great South Road (NoR 1)
  - Upgrades and tie-ins to eight key intersections as part of the Takaanini FTN (NoR 3)
- Replacement of four existing bridges at:
  - Otūwairoa / Slippery Creek (NoR 1)
  - Hingaia Stream (NoR 2)
  - Weymouth Road bridge over the NIMT (NoR 3)
  - Alfriston Road bridge over SH1 (NoR 3)
- Stormwater management devices across the project, including six wetlands, localised sections of rain-gardens, swales and culvert extensions.<sup>3</sup>

## 2.2 Locality plan

The locality of the South FTN is illustrated in Figure 1 below.

The South FTN is comprised of both the existing road corridor where the road upgrades can be accommodated within the existing road reserve and the additional areas that the South FTN NoRs seek to designate.<sup>4</sup>

The locations of the South FTN NoRs are shown in Figure 2 below. The labels in Figure 2 relate to the Great South Road key intersections within NoR 1 and are listed in Table 2 below:

**Table 2 NoR 1 Key Intersections** (source: Table 3-4, AEE)

NoR 1 Great South Road Key Intersections (North to South)	Corresponding Labels in Figure 2
Great South Road/ Browns Road/ Orams Road	1A
Great South Road/ Grande Vue Road	1B
Great South Road/ Mahia Road	1C
Great South Road/ Taka Street/ Walter Strevens Drive	1D
Great South Road/ Subway Road	1E
Great South Road/ Wellington Street	1F
Great South Road/ Beach Road/ Settlement Road	1G
Great South Road/ Park Estate Road	1H
Great South Road / Otūwairoa Stream / Slippery Creek Crossing	1I

<sup>3</sup> AEE, section 3.2.1 General Overview, p10

<sup>4</sup> Ibid, Section 1.2, p1

The locations of the South FTN NoRs are shown in Figure 3 (NoR 1), Figure 4 (NoR 2), Figure 5 (NoR 3) and Figure 6 (NoR 4) below.

The reader is also referred to:

- the General Arrangement plans that support the South FTN NoRs, which outlines the extent of the existing designations and the extent of the NoR and
- identification of the properties included in the South FTN NoRs in Attachment B: Schedule of Directly Affected Properties, Form 18s for the South FTN NoRs.

These documents are part of the notified South FTN NoRs and can be found under the heading application material on the hearings page, which may be accessed by following the link below:

<https://www.aucklandcouncil.govt.nz/have-your-say/hearings/find-hearing/Pages/Hearing-documents.aspx?HearingId=765>

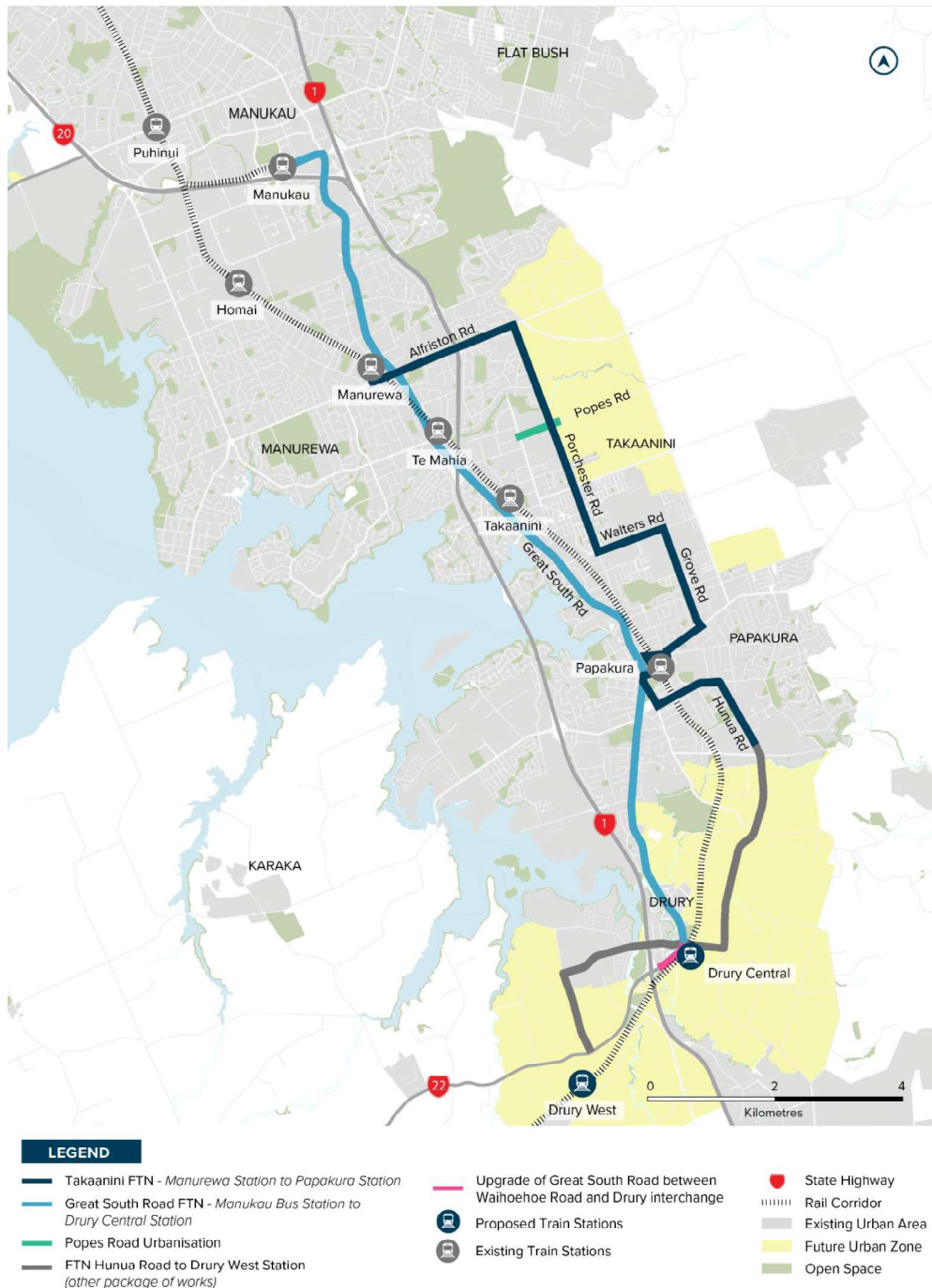


Figure 1 South FTN (source: Figure 1-1 South FTN-full network extent, AEE, p2)



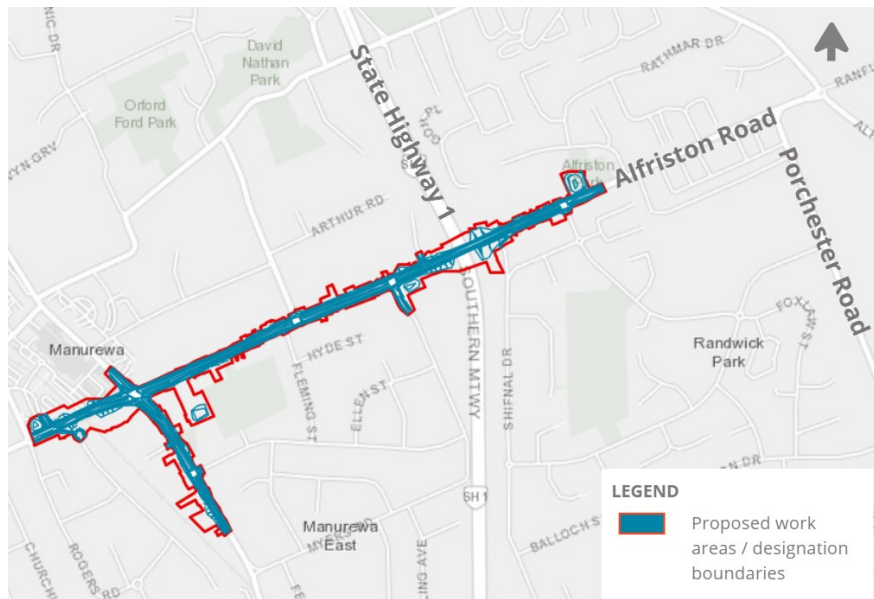
**Figure 2 Location of South FTN NoRs** (Source: Figure 1-2 South FTN NoR extents, AEE, p3)



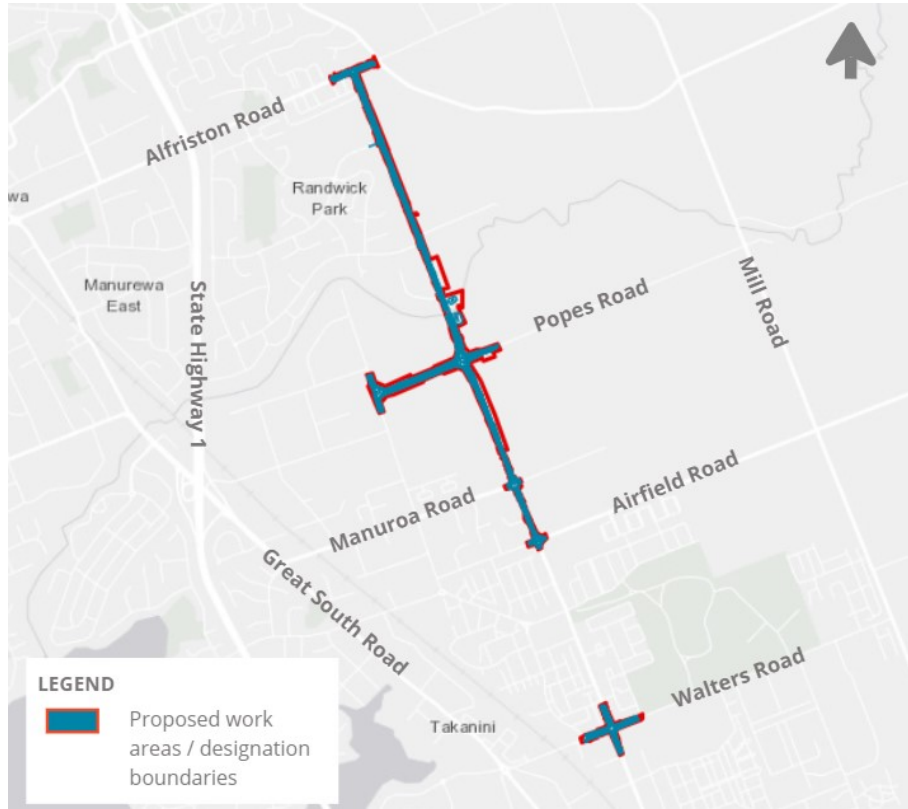
**Figure 3 Location of NoR 1** (Source: Figure 3-1 Extent of NoR 1 – Great South Road FTN Upgrade, AEE, p12)



**Figure 4 Location of NoR 2** (Source: Figure 3-3 Extent of NoR 2 – Great South Road Upgrade (Drury Section), AEE, p15).



**Figure 5 Location of NoR 3** (Source: Figure 3-4 Extent of NoR 3 – Takaanini FTN – Weymouth, Alfriston and Great South Road Upgrades, AEE, p16).



**Figure 6 Location of NoR 4** (Source: Figure 3-5 Extent of NoR 4 – Takaanini FTN – Porchester and Popes Road Upgrades, AEE, p18).

### 2.3 Notice of requirement documents

The lodged South FTN NoRs consist of the following documents:

- (i) Lodgement Cover Letter
- (ii) Volume 1
  - NoR 1 Form 18
    - Attachment A: Designation Plans
    - Attachment B: Schedule of Directly Affected Properties
    - Attachment C: Proposed Conditions for the Designation
  - NoR 2 Form 18
    - Attachment A: Designation Plans
    - Attachment B: Schedule of Directly Affected Properties
    - Attachment C: Proposed Conditions for the Designation



- NoR 3 Form 18
    - Attachment A: Designation Plans
    - Attachment B: Schedule of Directly Affected Properties
    - Attachment C: Proposed Conditions for the Designation
  - NoR 4 Form 18
    - Attachment A: Designation Plans
    - Attachment B: Schedule of Directly Affected Properties
    - Attachment C: Proposed Conditions for the Designation
- (iii) Volume 2
- Assessment of Effects on the Environment
    - Appendix A Assessment of Alternatives
    - Appendix B Ngaa ti Te Ata Waiohua Cultural Values Assessment
- (iv) Volume 3 Design Drawings
- General Arrangement Plan – NoR 1
  - General Arrangement Plan – NoR 2
  - General Arrangement Plan – NoR 3
  - General Arrangement Plan – NoR 4
- (v) Volume 4 Supporting Technical Reports
- Assessment of Aboricultural Effects
    - Assessment of Aboricultural Effects – Appendix B-NoR 1
    - Assessment of Aboricultural Effects – Appendix B-NoR 2
    - Assessment of Aboricultural Effects – Appendix B-NoR 3
    - Assessment of Aboricultural Effects – Appendix B-NoR 4
  - Assessment of Archaeological and Heritage Effects
  - Assessment of Construction Noise and Vibration Effects
  - Assessment of Ecological Effects
    - Assessment of Ecological Effects – Appendix 11
  - Assessment of Operational Noise Effects
    - Assessment of Operational Noise Effects – Appendix B, Part 1

- Assessment of Operational Noise Effects – Appendix B, Part 2
- Assessment of Operational Noise Effects – Appendix B, Part 3
- Assessment of Landscape and Visual Effects
- Assessment of Landscape and Visual Effects, Appendix A, Part 1
- Assessment of Landscape and Visual Effects, Appendix A, Part 2
- Assessment of Transport Effects
- Assessment of Transport Effects – Appendix A
- Assessment of Flooding Effects
- Social Impact Assessment
- Urban Design Evaluation
- Urban Design Evaluation, Appendix A, Parts 1 - 6

The information supporting the South FTN NoRs in Volumes 2, 3 and 4 relate to all four of the South FTN NoRs.

Given the large quantum of information supporting the South FTN NoRs, it has not been attached to this report. Instead, the information can be found on Council's notices of requirement page, by following the link provided in section 2.2 above.

## **2.4 Section 92 requests and responses**

Section 92 of the RMA allows councils to request further information from a requiring authority and/or commission a report, at any reasonable time before the hearing, subject to the provisions of Section 92.

The Council made a section 92 further information request relating to a range of matters on 30 October 2023 and received a combined response from SGA on 10 November 2023. The further information requests related to the four NoRs that make up the South FTN NoRs, unless otherwise stated. The Council's section 92 requests and the Requiring Authority's responses are provided in **Attachment 1** to this report.

## **2.5 Technical Specialist reviews**

The assessment in this report takes into account reviews and advice from the technical specialists listed in Table 3 Technical Specialists.

**Table 3 Technical Specialists**

Specialist	Specialty
Wes Edwards (Arrive Ltd)	Transport effects
Peter Runcie (SLR)	Noise and vibration effects
Lisa Mein (Mein Urban Design and Planning Limited)	Urban design effects
Rob Pryor (LA4 Ltd)	Landscape and visual effects
Gillian Stewart (Co-Creationz)	Social Impact
Daniel Kinnoch (CoLab)	Open space and parks planning
Trent Sunich (SLR)	Flooding and stormwater effects
Dan Windwood, Senior Built Heritage, Auckland Council	Built heritage effects
Myfanwy Eaves, Senior Specialist: Archaeology, Cultural Heritage Implementation, Heritage Unit, Auckland Council	Archaeological effects
West Fynn (Council)	Heritage Aboricultural effects
Leon Saxon (ArborLab)	Arboricultural effects
Simon Chapman (EcologyNZ)	Terrestrial ecology
Antoinette Bootsma, Senior Specialist, Earth, Streams and Trees Specialist Unit, Auckland Council	Aquatic ecology
David Russell, Senior Development Engineer, Regulatory Engineering South, Auckland Council	Development engineering

The specialist reviews are provided in **Attachment 2** to this report. The order of the specialist reviews corresponds with the order in the assessment of effects in section 4 of this report.

## 2.6 Notice of requirement description

### 2.6.1 Background

The South FTN is one of the transport works packages proposed for South Auckland as part of the Te Tupu Ngātahi Supporting Growth programme, which is a collaboration between Auckland Transport and Waka Kotahi New Zealand Transport Agency.<sup>5</sup> The key objective of the Te Tupu Ngātahi Supporting Growth programme is to protect land for future implementation of the strategic transport infrastructure required to support planned growth in South Auckland.<sup>6</sup>

The projected doubling of the population in the area of South Auckland between Manukau and Drury, and planned growth in adjoining Future Urban Zone (FUZ) areas in Ōpaheke-Drury over the next three decades poses significant transport challenges for the area. The South FTN Project is part of a strategic transport network planned to meet this growth challenge.<sup>7</sup>

### 2.6.2 Project objectives

The project objectives for the South FTN NoRs are identified in the South FTN Assessment of Effects on the Environment lodged by the Requiring Authority as a supporting document for the NoRs (AEE) as:

*Provide for upgraded multi-modal transport corridors between Manukau and Drury that:*

- a) Improve connectivity and access to economic and social opportunities;*
- b) Improve safety;*
- c) Improve efficiency, resilience, and reliability;*
- d) Integrate with and support existing development and planned urban growth;*
- e) Integrate with and support the existing and future transport network; and*
- f) Improve travel choice and contribute to mode share shift.<sup>8</sup>*

The project objectives for the South FTN have been defined for the purpose of addressing section 171 (1)(c) of the RMA and were developed from the Detailed Business Case (DBC) investment objectives.<sup>9</sup> The DBC investment objectives were defined to address the problem statements which were identified in the DBC as set out in Table 4 below.

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<sup>5</sup> Form 18, NoR 1, South FTN NoRs, p1

<sup>6</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network Assessment of Effects on the Environment, October 2023, Version 1, (AEE), Section 1.6, p5

<sup>7</sup> Ibid, Section 2.1 Growth in South Auckland, p6

<sup>8</sup> Ibid, Section 3.3, p19

<sup>9</sup> Ibid. At the time of writing this report, 12 March 2024, SGA advised that the DBC was not available publicly. Appendix A Assessment of Alternatives to the AEE provides some discussion of the South FTN DBC.

**Table 4 South FTN DBC Problem Statements**

<b>Problem Statements</b>	
<i>Problem Statement 1: Access</i>	<i>Lack of access to the public transport network for existing and new urban areas between Drury and Manukau, especially areas not serviced by rail resulting in the deteriorating accessibility to economic and social opportunities.</i>
<i>Problem Statement 2: Travel Choice</i>	<i>A lack of high quality, accessible and competitive public transport will continue to drive an over reliance on private vehicle travel in Takaanini and the South.</i>
<i>Problem Statement 3: Resilience</i>	<i>Public transport will experience poor reliability as demand grows if investment is not made in the transport network.</i>
<i>Problem Statement 4: Climate Change</i>	<i>The current transport system has an over-reliance on private vehicles. This combined with the limited low carbon transport alternatives results in significant transport emissions which is incongruent with current climate change goals.</i>
<i>Problem Statement 5: Integration</i>	<i>The existing corridor form and function creates conflicts between modes and a failure to integrate a high-quality public transport corridor will not support future growth.</i>

Source: Table 3-1 South FTN DBC problem statements, page 8, AEE

The investment objectives of the DBC are set out in Section 3.2 of the AEE as follows:

- *Access – Enable access to economic and social opportunities by providing high quality public transport between Drury and Manukau that integrates with the rail network;*
- *Integration – Support planned growth by integrating with the existing transport system, land use and the planned public transport network; and*
- *Travel Choice and Climate Change – Support growth and mode share shift towards low carbon transport modes.*

### **2.6.3 Lapse dates**

Section 184 of the RMA provides for a designation to lapse five years after it is included in the District Plan unless:

- a) It has been given effect to; or
- b) Within three months of the designation lapsing, the territorial authority determines that substantial progress or effort has been and continues to be made towards giving effect to the designation, or
- c) The designation specifies a different lapse period

The Form 18s for each of the South FTN NoRs request a 'different lapse period' as shown in Table 5 below.

**Table 5 Summary of Proposed Lapse Periods**

Notice of requirement	Lapse Period
NoR 1	15 years
NoR 2	10 years
NoR 3	15 years
NoR 4	15 years

#### 2.6.4 SGA Rationale for extended lapse periods

Section 8 of the AEE sets out the rationale for the extended lapse periods. The AEE states:

*Under section 184(1) of the RMA, lapse periods consistent with the implementation timeframes for the Project are sought. AT seeks lapse periods for the proposed designations ranging from 10-15 years for consistency with the proposed implementation timeframes for the designated works.*

The rationale set out for the lapse period for each of the NoRs is set out in Table 8-1 of the AEE.<sup>10</sup> This can be briefly summarised as relating to:

- (i) The date of 2028-2038 for implementation identified in transport assessment and DBC recommendations (for NoR 1, 3, and 4) and for NoR 2 the proposed implementation date in the mid-to-late 2020s for three adjacent projects: *SH1 Drury Interchange, the upgrade of Waihoehoe Road, and the Drury Train Station. These projects are funded under the New Zealand Upgrade Programme (NZUP).*
- (ii) Provides AT with sufficient time to undertake detailed design, obtain necessary resource consents, obtain funding, undertake tendering/procurement, undertake property and access negotiations, and construct the Project.

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<sup>10</sup> Ibid, p39-40

- (iii) Provides AT with sufficient flexibility to coordinate Project delivery with related public works. For NoR 2 these are stated as the three NZUP Projects. For NoR 3 these related public works are stated as being: *the coordination between the Weymouth Road NIMT bridge replacement and the future four-tracking of the NIMT and consequent changes to the layout of Manurewa Train Station*. For NoR 1 and 4 the “related public works” are not stated.
- (iv) The nature of the work and designation is such that it is highly likely to be implemented in stages, so the flexibility afforded by a 15-year lapse period is merited (for NoR 1, 3, 4).

There are submissions seeking relief in relation to the lapse periods for the South FTN NoRs and this matter is discussed in relation to those submissions in section 4.16.4 Property and land use effects and assessed in section 4.26 Designation Lapse Period.

### 2.6.5 Extent of Notices of Requirement

As already noted, the spatial extent of the South FTN NoRs are only a portion of the full South FTN, because some of the proposed corridor upgrades can be undertaken within the existing road reserve and do not require new designations.<sup>11</sup>

The AEE explains that an indicative design has informed the proposed designation footprint. The General Arrangement drawings (in Volume 3 of the AEE) include the “*proposed Project alignments*” and “*ancillary components, such as construction areas and stormwater requirements*”.<sup>12</sup>

The AEE also explains that typical offsets for construction areas of various construction works have been adopted to inform the proposed designation boundaries.<sup>13</sup> Table 9-1 in the AEE identifies the typical area or offset required for construction of various elements. For example, for bridge construction (substructures, abutments, piers) 20m is provided either side of the bridge, and a minimum of 40m behind each abutment end for construction access, e.g. cranes, piling rigs, trucks.

There are submissions seeking relief in relation to the extent of the proposed designations. This matter is discussed and assessed below in section 4.16.4 Property and land use effects of this report.

#### *Minor Alterations*

On 9 November 2023 the Requiring Authority wrote to Council to advise of minor alterations to the lodged extent of NoR 4 (the minor alterations letter). The minor alterations letter noted that it was understood that it was too late for changes to be made to the public notification documents and maps due to logistical constraints, and requested that the minor alterations letter be made publicly available. Accordingly, the minor alterations letter was included in the Council website material available at the time of public notification on 16 November 2023.

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<sup>11</sup> Ibid, Section 1.2, p1

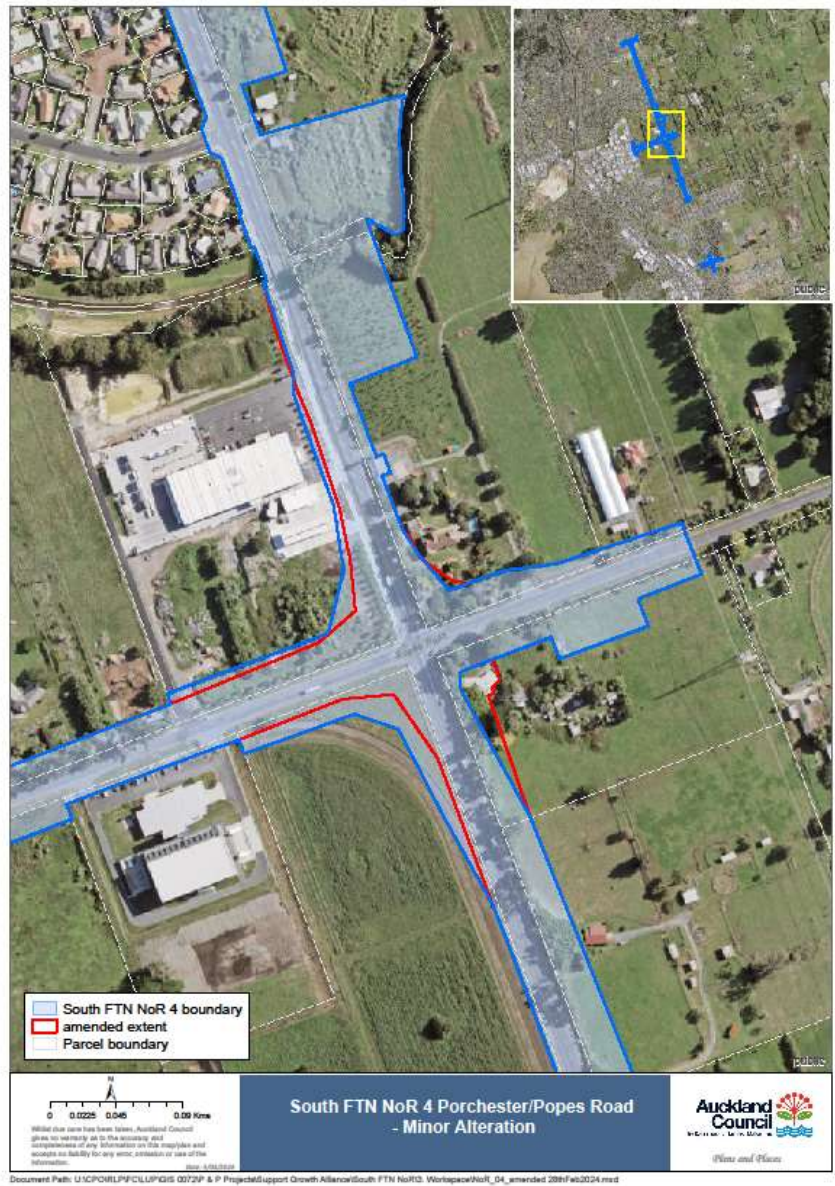
<sup>12</sup> Ibid, Section 9.1, p41

<sup>13</sup> Ibid, Section 9.2.2, p42

The maps available in the Council's Unitary Plan viewer did not reflect the minor alterations until Council sought and received information from the Requiring Authority that satisfied Council that there was no alteration to the essential nature or character of the lodged NoR 4 and that there would be no procedural unfairness to directly affected parties by these minor alterations taking place. I understand that the Council's Unitary Plan viewer was updated with the minor alterations to the boundaries of NoR 4 on 28 February 2024.

The changes to NoR 4 boundaries brought about by the minor alterations letter are illustrated in **Figure 7** below and described in **Table 6** below.

**Figure 7 South FTN NoR 4 Minor Alteration**





The minor alterations letter identified the extent of NoR 4 as lodged and as changed through the minor alterations for the relevant properties, as shown in Table 6 below:

**Table 6 Minor Alterations to NoR 4 – as advised in SGA Minor Alterations Letter**

Address	Approx. land to be designated (m <sup>2</sup> ) – as lodged	Approx. land to be designated (m <sup>2</sup> ) – as proposed under revised design	Change (m <sup>2</sup> )
296 Porchester Road	5,494	1,851	-3,643
354 Porchester Road	5,702	4,690	-1,012
51 Popes Road	5,295	6,473	1,178
52 Popes Road	8,818	8,557	-261

Submissions were received on NoR 4 in relation to 296 and 354 Porchester Road, and 52 Popes Road and those submissions are discussed in the relevant topic sections of this report.

The minor alterations letter advised Council that the full rationale for the proposed change and implications for the assessment of environmental effects will be addressed in evidence. The Requiring Authority may wish to address this matter in the hearing.

## **2.6.6 Future resource consents and approvals**

The Form 18s for the South FTN NoRs identify that no resource consents are sought at this time, and that resource consents will be sought when detailed design is complete and closer to the time of construction.

### **2.6.6.1 Future resource consents**

The Form 18s identify the future resource consents likely to be required as being:

- (i) Resource consents for the disturbance of contaminated, or potentially contaminated land under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011;
- (ii) Resource consents for specified infrastructure works within rivers, streams and natural wetlands under the Resource Management (National Environmental Standards for Freshwater) Regulations 2020;
- (iii) Resource consents for the following activities under the Auckland Unitary Plan: Operative in part:
  - a) Bulk earthworks and associated discharge of sediment;
  - b) Vegetation removal;

- c) Stormwater discharge to land or water;
  - d) Discharge of contaminants to land;
  - e) Activities (including structures and associated works) in, on, under or over the bed of rivers, streams, wetlands;
  - f) Water take, use and diversion; and
  - g) Temporary construction works.
- (iv) At this stage, no relocation of Transpower's pylons or transmission lines is anticipated and therefore no resource consents will be required under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.

### **2.6.6.2 Outline Plans**

Section 176A of the RMA requires an outline plan of the public work, project or work to be constructed on designated land, to be submitted by the requiring authority to the territorial authority to allow the territorial authority to request changes before construction is commenced. An outline plan need not be submitted if the proposed work has been otherwise approved under the RMA, the details of the work are incorporated into the designation, or the territorial authority waives the requirement for an outline plan.

Section 9.1 Approach to Design in the AEE explains that an outline plan or plans staged to reflect Project phases or construction sequencing, will be submitted to Council as required under section 176A of the RMA.

Proposed Conditions in Attachment C to the Form 18s, include Pre-Construction Condition 7 Outline Plan, which stipulates that an outline plan (or plans) shall be prepared in accordance with s.176A of the RMA, and may be submitted in parts or in stages to address particular activities or a Stage of Work of the Project.

### **2.6.6.3 Land subject to other designations**

The South FTN NoRs apply to some land that is subject to existing designations by other requiring authorities (e.g. Te Tāhuhu o te Mātauranga | Ministry of Education, and KiwiRail designations). In order to undertake work in accordance with a designation on land with an existing designation, written consent from every requiring authority that has an earlier designation is required under section 177(1)(a) of the RMA.

While written consent is required in order to undertake works within the existing designations where those works may prevent or hinder the earlier designation's purpose or project, it is not required in order to designate the land.

Some existing designations are noted in Tables 9-3 – 9-6 Receiving Environment in the AEE. However, it seems that not all designations are included in these tables in the AEE. For example as noted in the Te Tāhuhu o te Mātauranga | Ministry of Education submission (NoR 4 Submission 22) NoR 4 applies to the Designation of Papakura Normal School (designation 5023), but that designation is not listed in Table 9-6 in the AEE, as an existing designation.

While Form 18 and the AEE identify consultation and engagement with key stakeholders and directly affected landowners, there is no discussion of section 177(1)(a) of the RMA in the AEE or Form 18.

## 2.7 Nature of the Proposed Works

The nature of the proposed works is set out in the Form 18s for the South FTN NoRs, under that same heading. A more detailed description of the NoRs can be found in Section 3.2 Project Description and 9.2 Construction Methodology of the AEE.

A summary of the key features of each of the South FTN NoRs, drawn from the Form 18s, Section 3.2 and Section 9.2 of the AEE, is provided in Table 7 below.

**Table 7 Key Features of South FTN NoRs**

NoR	Key features
NoR 1	<p>Form 18 states the proposed work is for the construction, operation, and maintenance of upgrades to Great South Road to enable the Great South Road FTN route at eight locations between Manukau and Drury:</p> <ul style="list-style-type: none"> <li>• Orams Road to Halsey Road</li> <li>• Mahia Road</li> <li>• Taka Street</li> <li>• Subway Road</li> <li>• Ōpaheke Road</li> <li>• Clark Road to Butterworth Avenue</li> <li>• Park Estate Road</li> <li>• Otūwairoa / Slippery Creek Bridge</li> </ul> <p>Table 3-4 of the AEE identifies that NoR 1 Key intersections are Great South Road intersections with: Browns Road/Orams Road, Grande Vue Road, Mahia Road, Taka Street/Walter Strevens Drive, Subway Road, Wellington Street, Beach Road/Settlement Road, Park Estate Road, and</p>

NoR	Key features
	<p>Otūwairoa stream/Slippery Creek Crossing.</p> <p>NoR 1 applies to a collective linear extent of approximately 2.5km, of a total route length of the Great South Road FTN of 15.5km, and affects 171 properties.<sup>14</sup></p> <p>Form 18 states that in summary, the proposed works include:</p> <ul style="list-style-type: none"> <li>• Upgrades to Great South Road to accommodate bus priority measures, general traffic lanes, and walking and cycling facilities in eight locations (as listed in Form 18);</li> <li>• Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;</li> <li>• Reconfiguration of local roads, where the proposed work intersects with local roads; and</li> <li>• Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways.</li> </ul> <p>The four-lane and three-lane FTN arterial cross-sections, illustrated in Section 3-3 of the AEE, are used as the basis for concept design.<sup>15</sup></p> <p>Refer Figure 3 above for the general location of NoR 1.</p>
NoR 2	<p>Form 18 states the proposed work is for the construction, operation, and maintenance of upgrades to an approximately 530m section of Great South Road between Waihoehoe Road and SH1 in Drury to enable its urbanisation.</p> <p>Section 3.2.3 of the AEE notes that NoR 2 is for one of the Key Connections and is not a part of the FTN route.</p> <p>Form 18 states that in summary, the proposed works include:</p> <ul style="list-style-type: none"> <li>• An upgrade of Great South Road to accommodate general traffic lanes and walking and cycling facilities;</li> <li>• Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;</li> <li>• Reconfiguration of local roads, where the proposed work intersects with local roads; and</li> <li>• Construction activities including vegetation removal, establishment</li> </ul>

<sup>14</sup> Ibid, Section 3.2.2, p11

<sup>15</sup> Ibid, refer Table 3-3, p10-11

NoR	Key features
	<p>of construction areas and the regrading of driveways.</p> <p>The AEE explains NoR 2 enables two general traffic lanes per direction (the four-lane arterial cross-section illustrated in Figure 3-3 of the AEE is the basis for concept design), walking and cycling facilities, replacement of the Hingaia Stream bridge, localised provision for stormwater treatment raingardens, and an extension of one existing culvert.</p> <p>NoR 2 affects 47 properties.<sup>16</sup></p> <p>Refer Figure 4 above for the general location of NoR 2.</p>
NoR 3	<p>Form 18 states the proposed work is for the construction, operation, and maintenance of upgrades to Weymouth and Alfriston Roads between Selwyn Road and Saralee Drive, and to Great South Road between Halver Road and Myers Road to enable the Great South Road FTN and Takaanini FTN routes.</p> <p>The AEE explains NoR 3 upgrades approximately 1.7km along Weymouth Road and Alfriston Roads as part of the Takaanini FTN route; and an adjoining 590m length to the south of the intersection of Great South Road, Weymouth Road and Alfriston Road as part of the Great South Road FTN.<sup>17</sup></p> <p>Form 18 states that, in summary, the proposed works include:</p> <ul style="list-style-type: none"> <li>• Upgrades to Weymouth Road, Alfriston Road, and Great South Road accommodate bus priority measures, general traffic lanes and walking and cycling facilities;</li> <li>• Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;</li> <li>• Reconfiguration of local roads, where the proposed work intersects with local roads; and</li> <li>• Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways.</li> </ul> <p>The AEE states NoR 3 enables a four-lane FTN arterial cross-section for the Weymouth and Alfriston Road extent, and for part of its extent as it applies to Great South Road (refer Table 3-3, AEE). NoR 3 enables replacement of the Weymouth Road bridge over the NIMT and the Alfriston Road bridge over SH1, and four stormwater treatment wetlands.</p>

<sup>16</sup> Ibid, Section 3.2.3, p15

<sup>17</sup> Ibid, Section 3.2.4, p16

NoR	Key features
	<p>NoR 3 affects 430 properties.<sup>18</sup></p> <p>Refer Figure 5 above for the general location of NoR 3.</p>
NoR 4	<p>Form 18 states the proposed work is for the construction, operation, and maintenance of upgrades to Porchester Road between Alfriston Road and Walters Road to enable the Takaanini FTN route, and to Popes Road between Takanini School Road and east of Porchester Road to enable its urbanisation.</p> <p>The AEE states NoR 4 enables upgrades of approximately 3km along Porchester Road between Alfriston and Walters Road, as part of the Takaanini FTN route; and for 0.5km along Popes Road between Takanini School Road and Porchester Road. The AEE also states while Porchester Road is part of the Takaanini FTN route, Popes Road is one of the Key Connections.</p> <p>Form 18 states that in summary, the proposed works include:</p> <ul style="list-style-type: none"> <li>• Upgrades of Porchester Road and Popes Road to accommodate general traffic lanes and walking and cycling facilities;</li> <li>• Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;</li> <li>• Reconfiguration of local roads, where the proposed work intersects with local roads; and</li> <li>• Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways</li> </ul> <p>The AEE states the NoR enables two vehicular lanes, walking and cycling facilities, upgrades and tie-ins to six key intersections along both routes, and stormwater management devices comprising two wetlands on Porchester road and treatment swales on Popes Road.</p> <p>NoR 4 affects 99 properties.<sup>19</sup></p>

## 2.8 Affected land

Designation plans (provided as Attachment A in Form 18 of the NoRs) together with the schedule of directly affected properties (provided as Attachment B in Form 18 of the NoRs) describe the land that will be directly affected and will be required for the project and associated works.

<sup>18</sup> Ibid

<sup>19</sup> Ibid, section 3.2.5, p17

In response to the Council's section 92 request for further information (refer **Attachment 1**), the Requiring Authority provided the information set out in Table 8 below, identifying the extent and location of affected areas:<sup>20</sup>

**Table 8 Areas Affected by South FTN NoR**

NoR	Total Designation (m <sup>2</sup> )	Extent on private property (m <sup>2</sup> )	Extent in road corridor (m <sup>2</sup> )	Hydro extent (m <sup>2</sup> )	Extent in rail corridor (m <sup>2</sup> )
NoR 1 (Great South Road FTN Upgrade)	91,916	22,404	69,501	0	11
NoR 2 (Great South Road Upgrade – Drury Section)	32,079	12,808	18,809	462	0
NoR 3 (Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades)	144,235	75,895	66,014	0	2,236
NoR 4 (Takaanini FTN – Porchester Road Upgrade; and Popes Road Upgrade)	184,802	80,658	103,637	507	0

## 2.9 Site, locality, catchment and environment description

The information about the sites within the South FTN NoRs, locality and environment that have been provided in the Form 18s, AEE and supporting technical assessments are relied on in this report.

The Form 18s for the South FTN NoRs identify the sites to which the NoRs apply, and this report refers to and relies on that information.

The general location of the South FTN NoRs are shown in Figure 1-2 of the AEE, reproduced in this report as Figure 2 above.

<sup>20</sup> SGA Response to request for further information in accordance with section 92 of the RMA for the South FTN Project, 10 November 2023, P2, p1

The location of each of the South FTN NoRs is shown in Figures 3-1, 3-2, 3-3 and 3-4 of the AEE, which are reproduced earlier in this report as Figure 3 (NoR 1), Figure 4 (NoR 2), Figure 5 (NoR 3) and Figure 6 (NoR 4) respectively.

Section 7 of the AEE identifies the zoning of the sites directly affected by the South FTN NoRs and of the surrounding areas. Tables 9-3, 9-4, 9-5 and 9-6 of the AEE describe the current receiving environment, by listing currently existing community and recreational facilities, watercourses, significant ecological areas, historic heritage and archaeological values, precincts, areas of cultural value, existing designations, overlays and other non-statutory features.

The likely future changes to the receiving environment are identified by noting urban growth and intensification provided for in Council's Proposed Plan Change 78 (PC78) and AUP:OP.<sup>21</sup>

The supporting technical assessments also discuss and identify the current environment and likely future receiving environment, using the same information provided in the AEE.

## 2.10 Other notices of requirement, designations, and applications

The South FTN NoRs interfaces with other notices of requirement in the general locality, as identified in Table 9 below.

**Table 9 Other NoRs in the Vicinity of the South FTN NoRs**

Project and Interface with South FTN NoR	Status
<p><b>a) Takaanini Level Crossings Project NoR 1 (Auckland Transport)</b></p> <p>The requirement is for the construction, operation, maintenance and upgrade of transport infrastructure on and around Spartan Road, Manuia Road, Manuroa Road and Taka Street which includes:</p> <ul style="list-style-type: none"> <li>• the closure of the existing level crossings at Spartan Road, Manuroa Road and Taka Street,</li> <li>• new bridges with general traffic lanes and walking and cycling facilities across the NIMT railway line at Manuia Road and Taka Street,</li> <li>• new bridges with walking and cycling facilities across the NIMT railway line at Spartan Road</li> </ul>	<p>Notified. Subject of the same hearing as the South FTN NoRs</p>

<sup>21</sup> AEE, section 9.7, p50-65

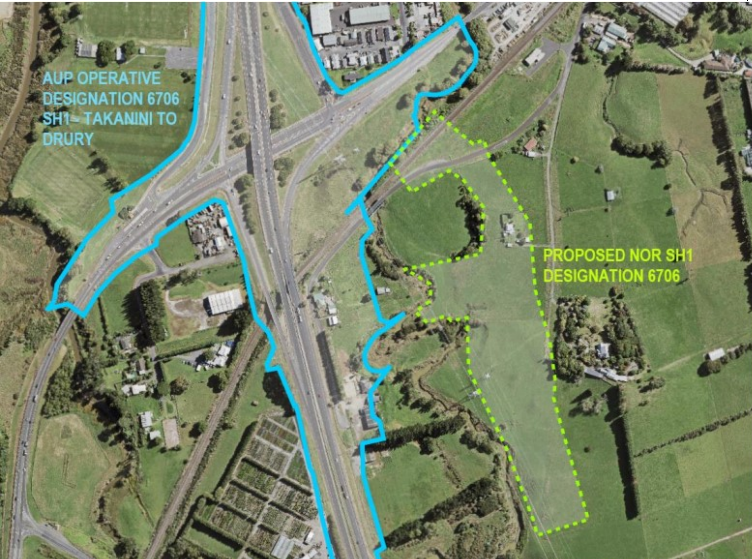


Project and Interface with South FTN NoR	Status
<p>and Manuroa Road,</p> <ul style="list-style-type: none"> <li>all associated works.<sup>22</sup></li> </ul>	
<p><b>b) Takaanini Level Crossings Project NoR 2 Walters Road (Auckland Transport)</b></p> <p>The requirement is for the construction, operation, maintenance and upgrade of transport infrastructure within the Walters Road area of Takaanini, which includes the closure of the existing level crossing at Walters Road, construction of a new bridge with general traffic lanes and walking and cycling facilities across the NIMT at Walters Road as well as local road connections and associated works.<sup>23</sup></p>	<p>Notified. Subject of the same hearing as South FTN NoRs</p>
<p><b>c) Notice of Requirement: Alteration to Designation 6706 State Highway 1 – Takanini to Drury – Drury Access Ramp (Waka Kotahi NZ Transport Agency)</b></p> <p>Notice of requirement lodged by Waka Kotahi to alter Designation 6706 State Highway 1 – Takanini to Drury. The purpose of the alteration to Designation 6706 is to accommodate the construction of a new southbound access ramp at Drury Interchange to provide a direct vehicle connection from SH1 to Drury Centre Precinct. The Drury Access Ramp Project (NoR) will be delivered in conjunction with the Papakura to Drury South (P2DS) Projects, which includes the planned upgrades to Drury Interchange under Stage 1B1 of the P2DS Project. The P2DSs is a Waka Kotahi Project which is set to improve the safety and functionality of SH1 and provide for long term growth in the south of Auckland.<sup>24</sup></p>	<p>Lodged 16 August 2023</p>

<sup>22</sup> Auckland Council, Public Notice of Notice of Requirement – Spartan Road, Manuia Road, Manuroa Road and Taka Street (NoR 1) Auckland Transport.

<sup>23</sup> Auckland Council, Public Notice of Notice of Requirement – Walters Road level crossing and new multi modal bridge (NoR 2) Auckland Transport.

<sup>24</sup> Auckland Council, Notices of Requirement, accessed at <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=202#:~:text=Notice%20of%20requirement%20lodged%20by,SH1%20to%20Drury%20Centre%20Precinct.>

Project and Interface with South FTN NoR	Status
<p>The requirement involves changes to the offramp from SH 1 at Drury, as shown in the image below:</p>  <p>Figure 3-1 Indicative location plan of the NoR for the proposed alteration to the Designation 6706 (Green), in relation to the Operative Designation 6706 (Blue)</p> <p>Figure sourced from Drury Access Ramp Project, AEE, 15 August 2023, p11</p>	

Upon request from the hearing commissioners, the Council can provide a list of existing land use and regional consents (e.g., groundwater takes, network discharges) within and immediately adjoining the project footprint. Due to the large spatial extent of the South FTN NoRs, and as consent processing is a continually evolving situation, this information has not been appended to this report.

## 2.11 Overlap with the Takaanini Level Crossing NoRs

The South FTN NoRs are being heard at a joint Council hearing with another Supporting Growth (Te Tupu Ngātahi) project, the Takaanini Level Crossing NoRs.

The Takaanini Level Crossing NoRs overlap with two of the South FTN NoRs, as illustrated in Figure 8 and Figure 9 below.

Figure 8 below shows (in red outline) that part of the South FTN NoR 1 extent that includes upgrades at the intersection of Great South Road, Walter Strevens Drive and Taka Street.<sup>25</sup> This part of the South FTN NoR overlaps with the Takaanini Level Crossing NoR 1 (Taka Street project area), shown in Figure 8 below in green dots.

<sup>25</sup> Source: Auckland Unitary Plan, planning maps, accessed 8 March 2024

The Taka Street project area involves closure of the existing level crossing, construction of a new bridge with general traffic lanes and walking and cycling facilities across the NIMT and associated works.

**Figure 8 Overlap of South FTN NoR 1 with Takaakini Level Crossing NoR.**



Figure 9 below shows (in red outline) that part of the South FTN: Porchester and Popes Road Upgrades NoR 4 area that overlaps with the Takaanini Level Crossing NoR 2 (Walters Road project area) shown in green dots.<sup>26</sup>

**Figure 9 Overlap of South FTN NoR 4 with Takaanini Level Crossing NoR**



Whether and how the timing of the proposed works in the South FTN interrelate with the other NoRs noted in Table 9 above, is not able to be identified from the South FTN NoRs documentation, including the AEE.

<sup>26</sup> Source: Auckland Unitary Plan, Planning Maps, accessed 8 March 2024

The Takaanini Crossings NoRs seek a lapse period of 15 years. The proposed lapse dates for South FTN NoR 1 and South FTN NoR 4 are both 15 years. It is not apparent whether the works within the South FTN NoRs and the Takaanini Crossings NoRs might happen at the same time and whether there may be potential cumulative effects during construction works.

This is a matter that the Requiring Authority may wish to provide information on in evidence for the hearing.

### **3 Notification, submissions and local board views**

#### **3.1 Notification**

The South FTN NoRs were publicly notified on 16 November 2023.

The closing date for submissions was 14 December 2023.

#### **3.2 Consideration of Submissions**

The consideration of submissions has been included within Section 4 alongside the assessment of environmental effects.

A summary of the submissions is attached as **Attachment 3**. Copies of submissions are included in **Attachment 4**.

##### **3.2.1 Waivers for Submissions**

Submissions on a notice of requirement for designation must be in the prescribed form, which is Form 21 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003. Information that must be provided in accordance with Form 21 is a brief description of the notice of requirement for designation to which the submission relates.

A number of submissions to the South FTN NoRs gave an incorrect description of the NoR to which their submission relates. In all instances it was apparent from the content of the submission which NoR the submission was intended for, and this is understood to have been confirmed directly with the submitters by Council administration staff.

The RMA provides for discretion to waive information requirements (and time limits) under section 37 and 37A of the RMA:

*Section 37 Power of waiver and extension of time limits*

*(1) A consent authority or local authority may, in any particular case,—*

- (a) extend a time period specified in this Act or in regulations, whether or not the time period has expired; or
- (b) waive a failure to comply with a requirement under this Act, regulations, or a plan for the time or method of service of documents.
- ...
- (2) If a person is required to provide information under this Act, regulations, or a plan and the information is inaccurate or omitted, or a procedural requirement is omitted, the consent authority or local authority may—
  - (a) waive compliance with the requirement; or
  - (b) direct that the omission or inaccuracy be rectified on such terms as the consent authority or local authority thinks fit.

**Section 37A Requirements for waivers and extensions**

- (1) A consent authority or local authority must not extend a time limit or waive compliance with a time limit, a method of service, or the service of a document in accordance with section 37 unless it has taken into account—
  - (a) the interests of any person who, in its opinion, may be directly affected by the extension or waiver; and
  - (b) the interests of the community in achieving adequate assessment of the effects of a proposal, policy statement, or plan; and
  - (c) its duty under section 21 to avoid unreasonable delay.

In order to avoid any doubt as to the validity of the submissions it is recommended that the Hearings Commissioners consider and decide on waivers of information requirements for the submissions listed in Table 10 below.

**Table 10 Waiver of Information Requirements**

<b>Submitters name and Submission Number</b>	<b>Waiver Issue</b>	<b>NoR</b>
Drury Tyres NoR 2 Submission 15	The submission stated the designation or alteration it related to is the “South FTN NoR 1 Great South Road FTN Upgrade”. However the specific provisions the submission relates to and the reasons for opposition relate to properties affected by the South FTN NoR 2.	NoR 2
David Hay NoR 2 Submission 16	The submission stated the designation or alteration it related to was the “South FTN NoR 1 Great South Road FTN Upgrade”. However the specific provisions the submission relates to and the reasons for opposition relate to properties affected by the South FTN NoR 2.	NoR 2

Submitters name and Submission Number	Waiver Issue	NoR
Manurewa Business Association NoR 1 Submission 32	The submission stated the designation or alteration it related to was the South FTN NoR 3. However, the specific provisions and submissions relate to and the reasons for opposition also relate to NoR 1. The submission appears to be to both NoR 1 and NoR 3.	NoR 1
Southmall Manurewa NoR 1 Submission 33	The submission stated the designation or alteration it related to was the South FTN NoR 3. However, the specific provisions and submissions relate to and the reasons for opposition also relate to NoR 1. The submission appears to be to both NoR 1 and NoR 3.	NoR 1
Manpreet Kaur NoR 4 Submission 25	The submission stated the designation or alteration it related to is the North: NoR 4 SH1 Improvements-Albany to Orewa but also stated that the submission relates to 33 Walters Road Takanini. The submitter confirmed to Council staff on 17 January 2024 that the submission was intended to be made to the South FTN NoR 4.	NoR 4

At the start of the hearing, the Hearing Commissioners must decide whether to waive information requirements. Under section 37A of the RMA, the Hearing Commissioners must take into account the matters set out in section 37A, as cited above.

Under s37 and s37A of the RMA, I recommend that the information requirements for the submissions listed in Table 10 above be waived. The reasons for my recommendation are:

- the submissions are within scope;
- the matters raised in the submission relate to the effects of the proposal and it is in the interest of the community for those effects and matters raised by the submitters to be considered.
- I do not consider that the waiver would directly affect the interests of any person; and
- No delay in the assessment and consideration of the NoR has or will result from waiving the information requirements, and therefore the duty to avoid unreasonable delay is upheld.

### 3.2.2 Assessment of submissions to all South FTN NoRs

The following submitters have submitted across all of the South FTN NoRs:

- Kāinga Ora Homes and Communities
- Te Tāhuhu o te Mātauranga Ministry of Education
- Telecommunications Submitters
- Watercare Services Limited

The matters raised and relief sought in these submissions are discussed under the relevant effects topic in section 4 of this report.

### 3.2.3 Submissions received

A total of 112 submissions were received across the South FTN NoRs, as summarised in Table 11 below:

**Table 11: Submissions received on South FTN NoRs**

NoR	Support / Support in part	Oppose	Neutral/not stated	Total
NoR 1	4	23	4	31
NoR 2	4	10	2	16
NoR 3	4	31	5	40
NoR 4	4	18	3	25
<b>Totals</b>	16	81	13	112

A summary of the submissions for each of the South FTN NoRs is provided in **Attachment 3** to this report. The issues raised in submissions, which are generally in common for all the NoRs, are shown in Table 12 below:

**Table 12: Issues raised in submissions**

Positive effects
<ul style="list-style-type: none"> <li>• Support for provision of transport choices and encouraging mode shift to sustainable transport modes as the population of South Auckland continues to grow</li> <li>• Support for the project's aim to plan transport investment, improve active mode facilities and provision of transport infrastructure that will provide safe access to the current and future wider school network</li> <li>• Efficient and accessible Rapid Transport Networks and Active Mode Corridors facilitate mode transfer and enable future urban growth</li> <li>• Support for the outcomes to be achieved by the project</li> </ul>

<ul style="list-style-type: none"> <li>• Support for upgrade of intersections</li> </ul>
<b>Traffic</b>
<ul style="list-style-type: none"> <li>• Access and parking issues (including loss of parking spaces)</li> <li>• Design issues</li> <li>• Necessity for bus lanes and cycle lanes</li> <li>• Dedicated bus lanes and integration with road design</li> <li>• Safety around schools</li> <li>• Construction traffic effects</li> </ul>
<b>Noise</b>
<ul style="list-style-type: none"> <li>• Construction noise/vibration</li> <li>• Ongoing noise – signalised intersections</li> <li>• Need for mitigation – the environment at that time of construction</li> <li>• Concerns NZS6806 does not address all RMA noise effects</li> <li>• Low noise road surface</li> </ul>
<b>Natural hazards and flooding</b>
<ul style="list-style-type: none"> <li>• Increases in impervious surfaces will increase flooding</li> <li>• Adequacy of assessment of flooding effects</li> <li>• Changes in flow affecting flood levels</li> <li>• Provision of flood modelling to adjoining development</li> <li>• Assurances that no increase in flood hazard for properties</li> </ul>
<b>Urban Design/Landscape</b>
<ul style="list-style-type: none"> <li>• Landscape and amenity – reinstatement of property; loss of front yards</li> <li>• Connectivity and placemaking</li> <li>• Compliance with landscape and precinct plans for the Takanini Precinct</li> <li>• ULDMP condition and stakeholder participation in detailed design phase</li> <li>• ULDMP condition and a dispute resolution process</li> </ul>
<b>Social effects (overlaps with a number of the effects identified)</b>
<ul style="list-style-type: none"> <li>• Uncertainty due to 10 and 15 years lapse periods</li> <li>• Duration of construction period</li> <li>• Uncertainty about property effects / reinstatement / purchase of property</li> <li>• Fear of proximity of road and/or footpath to house</li> <li>• Disruption to business – wider community impacts</li> </ul>
<b>Archaeology/Built Heritage</b>
<ul style="list-style-type: none"> <li>• Adequacy of assessment of historic heritage values of trees</li> <li>• Adequacy of assessment of built heritage</li> </ul>
<b>Property/economic effects</b>
<ul style="list-style-type: none"> <li>• Extent of designation boundary</li> <li>• Requests for properties not to be included</li> <li>• Requests for review of extent required for construction and for operation</li> <li>• Access and loss of parking</li> <li>• Stormwater and flooding – requests seeking that stormwater is dealt with within designation and not exacerbate issues on adjacent properties</li> <li>• Length of lapse period – blighting and development uncertainty</li> <li>• Property values</li> <li>• Business viability uncertainty or disruption</li> </ul>



- Landscape and amenity – reinstatement of property
- Acquisition and compensation
- Uncertainty of works required (retaining walls, battered slopes, earthworks)
- Development potential (intensification)

#### **Other matters raised**

- Construction effects/operational effects - noise, vibration, dust, congestion, pollution, visual, ecological, economic, privacy, crime, safety, flooding, earthworks
- Effects on other infrastructure – i.e., Watercare, Spark (and other telecommunication operators), Ministry of Education, Kāinga Ora
- Consultation and engagement – inadequate or requesting ongoing / periodic engagement
- Designation process
- Submission period
- Lapse period
- Assessment of alternatives – either inadequate or recommending alternatives
- Timing/staging of projects
- Necessity for projects including elements of projects i.e., active mode facilities (cycling and pedestrian), and bus lanes
- Conditions – requests for site specific/new conditions, or amendments
- Project funding

The matters raised in submissions have been considered in the assessments set out in section 4 of this report, by the relevant Council specialists and in my planning assessment, together with the assessment of environmental effects, the relevant statutory provisions, and the recommended conditions to be included if the South FTN NoRs are confirmed, in each of the NoRs.

The submissions are addressed by grouping and not all submissions are referred to individually in the specialist and planning assessments, but all of the issues raised by the submissions, and the relief sought, have been read and considered in the assessments and recommendations made.

### **3.3 Local Board views**

Views on the South FTN NoRs were sought from and provided by the following local boards:

- The Ōtara-Papatoetoe Local Board provided their views at a local board meeting on 5 December 2023.

- The Manurewa Local Board provided their views at a local board meeting on 7 December 2023 and resolved to speak to the Board’s views at the hearing.
- The Papakura Local Board provided their views at a local board meeting on 13 December 2023 and resolved to speak to the Board’s views at the hearing.
- The Franklin Local Board provided their views at a local board meeting on 12 December 2023.

The Local Board views are provided in **Attachment 4** to this report.

The Local Board views have been read and considered in the assessments and recommendations made.

## 4 Consideration of the notice of requirement

### 4.1 Designations under the Resource Management Act 1991

The RMA provides that the procedures adopted in processing a notice of requirement are generally those adopted for processing a resource consent application. This includes lodgement, requiring further information, notification, receiving and hearing of submissions. In respect of the South FTN NoRs, all of those procedures have been followed.

The procedure differs from the resource consent process in respect of the council consideration of a notice of requirement. Section 171(1) of the RMA states:

*(1A) When considering a requirement and any submissions received, a territorial authority must not have regard to trade competition or the effects of trade competition.*

*(1) When considering a requirement and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the requirement, having particular regard to—*

*(a) any relevant provisions of—*

*(i) a national policy statement:*

*(ii) a New Zealand coastal policy statement:*

*(iii) a regional policy statement or proposed regional policy statement:*

*(iv) a plan or proposed plan; and*

*(b) whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if—*

*(i) the requiring authority does not have an interest in the land sufficient for undertaking the work; or*

- (ii) *it is likely that the work will have a significant adverse effect on the environment; and*
  - (c) *whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
  - (d) *any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.*
- (1B) *The effects to be considered under subsection (1) may include any positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from the activity enabled by the designation, as long as those effects result from measures proposed or agreed to by the requiring authority.*

Section 171(1) is subject to Part 2 of the RMA. Part 2 contains the purpose and principles of the RMA. It has been confirmed by the Environment Court that, in relation to a designation matter:

*...all considerations, whether favouring or negating the designation, are secondary to the requirement that the provisions of Part II of the RMA must be fulfilled by the proposal.<sup>27</sup>*

After considering these matters, the council will make a recommendation to the requiring authority under section 171(2) of the RMA, which states:

- (2) *The territorial authority may recommend to the requiring authority that it –*
  - (a) *confirm the requirement:*
  - (b) *modify the requirement:*
  - (c) *impose conditions:*
  - (d) *withdraw the requirement.*

Reasons must be given for the recommendation under section 171(3) of the RMA. Refer to section 6 below for my recommendation.

The requiring authority must make a decision whether it accepts or rejects the recommendation of the council in whole or in part, in accordance with section 172 of the RMA. The decision of the requiring authority must then be notified by council in accordance with section 173 of the RMA, together with information about the time within which an appeal against the decision may be made by submitters and directly affected landowners and occupiers.

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<sup>27</sup> See Estate of P.A. Moran and Others v Transit NZ (W55/99)

## 4.2 Effects on the environment

A notice of requirement for designation by a requiring authority must be made in the form prescribed, which, under the Resource Management (Forms, Fees and Procedure) Regulations 2003, is Form 18. Form 18 requires that the effects that the public work, project or work will have on the environment and the ways in which any adverse effects will be mitigated are described. As noted in Section 2.3 of this report, the NoRs were lodged with supporting documentation, including an AEE and supporting technical reports.

### 4.2.1 Requiring Authority approach to the assessment of environmental effects

The Requiring Authority's approach to the assessment of environmental effects of the South FTN NoRs is set out in section 9.6 of the AEE.

The Requiring Authority states it has limited its assessment to matters that trigger a district plan resource consent under the AUP:OP, as district plan resource consents are the only activities authorised by the proposed designations. The AEE goes on to state that NES or regional plan consenting requirements, where these are triggered, are not authorised by the designations and will require future resource consents. I agree that under sections 175, 176 and 178 of the RMA, a designation is a land use or district planning mechanism and the effects to be considered are those that the South FTN NoRs would authorise if and when they are confirmed designations.

The assessment of effects in this report considers the effects on the environment of allowing the notices of requirement, having particular regard to the matters set out in sections 171(1)(a) to (d) of the RMA.

The Requiring Authority identifies in Section 9.7 of the AEE that the approach it has taken to assessing the likely receiving environment anticipates *the Project will be implemented as and when necessitated by growth and enabled by funding availability*<sup>28</sup> and recognising that assessing the effects on the environment as it existing today will not provide an accurate reflection of the environment in which the effects of the construction and operation of the transport corridor will be experienced.<sup>29</sup>

I agree that receiving environment should be considered in terms of not only the environment as it exists now, but also the reasonably foreseeable environment. I note what comprises the environment was considered in the Court of Appeals Decision in *QLDC v Hawthorn Estate Ltd*:<sup>30</sup>

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<sup>28</sup> AEE, section 9.7, p51

<sup>29</sup> Ibid

<sup>30</sup> *Queenstown Lakes District Council v Hawthorn Estate Ltd* [2006] NZRMA, 424, (2006) 12 ELRNZ 299 at [84]. The applicability of the Hawthorn decision to notices of requirement was confirmed in *Villages of NZ (Mt Wellington) Ltd v Auckland City Council EnvC Auckland A023/09*, March 2009, at [32]

*In our view, the word 'environment' embraces the future state of the environment as it might be modified by the utilisation of rights to carry out permitted activity under a district plan. It also includes the environment as it might be modified by the implementation of resource consents which have been granted at the time a particular application is considered, where it appears likely that those resource consents will be implemented.*

The reasonably foreseeable environment includes permitted activities, resource consents that have been granted and likely to be put into effect, and existing uses that continue as authorised by the RMA.<sup>31</sup>

The Requiring Authority's AEE sets out that the approach to assessing the likely future environment for assessment purposes has included consideration of existing zoning patterns; zoning patterns contemplated under Plan Change 78; and the likelihood and timing of urbanisation of the Future Urban Zone having regard to the Future Urban Land Supply Strategy (FULSS) and the (then) draft Future Development Strategy.<sup>32</sup>

Missing from the description of the receiving environment is any identification of permitted activities and resource consents that have been granted and are likely to be implemented. It is clear from submissions made that some resource consents that have been granted and that are intended to be implemented have not been identified by the Requiring Authority as part of the receiving environment. I also note that the list of existing designations appears to be incomplete.

In *QLDC v Hawthorne Estate Ltd*, the Court found that the environment can be determined in a practical way by receiving evidence about any resource consents granted by the consent authority in the past in relation to the surrounding area, and whether those consents are likely to be implemented. The Court also found in *QLDC v Hawthorne Estate Ltd* that in areas that were undergoing significant change or where such change was planned to occur, the applicable policy framework in the district plan, together with the rules, would give considerable guidance as to the nature and intensity of future activities likely to be established on the surrounding land.<sup>33</sup>

The Requiring Authority's AEE has noted the existing zones of the AUP:OP within the South FTN NoRs, and identified in general terms there may be intensification of development arising from Proposed Plan Change 78. However, there is little analysis of what development may arise as a consequence of the permitted activities within the zones, or of the 'applicable policy framework', which will form the receiving environment of the works that may take place in 10 years (NoR 2) to 15 years (NoR 1, 3 and 4).

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<sup>31</sup> Ibid, at [54]

<sup>32</sup> AEE, section 9.7, p50-65

<sup>33</sup> Ibid, at [61]

The Requiring Authority's AEE and other technical assessments lodged in support the South FTN NoRs discusses the future environment and explains it as being the basis and rationale for the Project. The AEE and Appendix A to the AEE discuss the need for the Project noting the policy framework sets a clear direction for councils to enable increased housing supply in high growth areas, and *these signal that growth in South Auckland will continue to be provided for, which in turn will result in travel demands necessitating multi-modal transport improvements such as the South FTN.*<sup>34</sup>

There is an expectation expressed in the AEE that the future environment will be different to that existing currently. However, the Requiring Authority's assessment of the receiving environment has not addressed this matter in any detail. As noted in section 4.22.1.3 below, the AUP:OP zone descriptions, objectives, policies and rules (including permitted activities) have not been discussed in the AEE.

It can be accepted that the exiting AUP:OP provisions may not provide an exact picture of what the future receiving environment will be, given the likely review of that plan and new resource management legislation in the intervening years between now and when the South FTN will be implemented.<sup>35</sup> However, as the AEE and Appendix A to the AEE note, the policy framework signals that there will continue to be intensification of housing within the Project area.

The identification of the receiving environment is of particular relevance to how the Proposed Conditions address actual and potential adverse effects on the environment. Some of the Proposed Conditions seek to 'lock in' or 'freeze' the receiving environment to what was present on the ground at the time the Requiring Authority's assessments were carried out in preparing the South FTN NoRs, without taking into account permitted activities, consents that have been granted that are likely to be implemented or the environment as it will be in 10-15 years under the applicable policy framework.<sup>36</sup> This is the case for:

- Proposed Condition 25 Pre-Construction Lizard Survey, which limits the need for an updated survey of native lizard habitats to the locations shown in Schedule 2 Identified Native Lizard Habitat Areas;

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<sup>34</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network, Appendix A Assessment of Alternatives, October 2023, p13

<sup>35</sup> The Natural and Built Environment Act and the Spatial Planning Act were repealed in December 2023; the Fast Track Approvals Bill has been introduced and had its first reading in March 2024; the Government has a policy to repeal the Resource Management Act 1991 and replace it with new legislation. The Fast Track Approvals Bill includes (cl17) eligibility criteria for projects to be referred to panels as including, amongst other things, whether the project will increase the housing supply, address housing needs or contribute to a well-functioning urban environment. Accessed on 8 March 2024 at

<https://www.legislation.govt.nz/bill/government/2024/0031/latest/LMS943195.html>

<sup>36</sup> The Supporting Technical Reports in Volume 4 of the South FTN NoRs are dated 13 October 2023.

- Proposed Condition 27 Tree Management Plan, which limits the objective of the tree management plan to avoiding, remedying or mitigating effects of construction on trees identified in Schedule 3 of the Conditions;
- Unnumbered condition prior to Proposed Condition 30 and Proposed Condition 32, which limits protected premises and facilities to those identified in Schedule 4: PPFs Noise Criteria Categories.

This is a matter that is discussed further in the relevant topic sections of this report, below.

I am of the opinion that the Requiring Authority's assessment and identification of the receiving environment may not be complete and consider that it may be useful for the Requiring Authority to address this matter in evidence at the hearing.

#### **4.2.2 Effects to be disregarded – trade competition**

I do not consider that there are any trade competition effects that should be assessed.

The submissions do not raise any trade competition issues.

#### **4.2.3 Effects that may be disregarded – permitted baseline assessment**

The permitted baseline refers to the adverse effects of permitted activities enabled by the AUP:OP on a site. In this case the NoRs refer to multiple sites with a range of different zonings, including residential, business and future urban zones, and combinations of permitted activities.

The Environment Court in *Beadle v Minister of Corrections*<sup>37</sup> accepted that the obligation to apply permitted baseline comparisons extended to Notices of Requirement. In *Nelson Intermediate School v Transit NZ*<sup>38</sup>, the Court accepted that the permitted baseline must define the “environment” under section 5(2) (b) and (c) and from that section 171(1). When considering the adverse environmental effects of a proposal, the effects may be considered against those from permitted baseline activities. As the effects resultant from permitted baseline activities may be disregarded, only those environmental effects which are of greater significance need be considered.

In *Lloyd v Gisborne District Council*,<sup>39</sup> the Court summed up the three categories of activity that needed to be considered as part of the permitted baseline as being:

1. What lawfully exists on the site at present
2. Activities (being non-fanciful activities) which could be conducted on the site as of right; i.e., without having to obtain a resource consent<sup>40</sup>

<sup>37</sup> *Beadle v The Minister of Corrections*, A074/2002, para (1002)

<sup>38</sup> *Nelson Intermediate School v Transit NZ* (2004) 10 ELRNZ 369

<sup>39</sup> *Lloyd v Gisborne District Council* [2005] W106/05

3. Activities which could be carried out under granted, but as yet unexercised, resource consent.

Application of the permitted baseline approach is optional depending on its merits in the circumstances of the NoRs being considered.

I do not consider that the permitted baseline approach is appropriate in the case of the South FTN NoRs. There are a range of permitted activities that apply to the various zones, including permitted levels of earthworks, vegetation clearance, construction noise, and the establishment of roads. However, the permitted thresholds and associated effects that apply throughout the AUP:OP zones are significantly lower than the scale and intensity of activities proposed by the NoRs.

I do not consider that a comparison between the effects of what is permitted and what is proposed can be of use when considering the South FTN NoRs. Therefore, I recommend that the permitted baseline be disregarded. I also note that the requiring authority has not put forward this approach in its assessment of effects.

#### **4.2.4 Effects that may be disregarded – written approvals.**

Any effect on a person who has given written approval to the notice of requirement may be disregarded if it is appropriate to do so.

No written approvals have been provided by the requiring authority.

#### **4.2.5 Use of Management Plans**

The proposed conditions in Attachment C to the Form 18s of the South FTN NoRs would require the preparation of a number of management plans. No draft management plans have been provided with the lodged NoRs.

If the South FTN NoRs are confirmed, the management plan conditions are proposed as the framework to guide the detailed design of the works, as well as to avoid, remedy, mitigate or manage the adverse effects of the construction and operational aspects of the project.

The following management plans have been offered by the Requiring Authority in the Proposed Conditions for the South FTN NoRs:

- Stakeholder Communication and Engagement Management Plan (SCEMP)
- Urban and Landscape Design Management Plan (ULDMP)
- Construction Environmental Management Plan (CEMP)
- Construction Traffic Management Plan (CTMP)
- Construction Noise and Vibration Management Plan (CNVMP)
- Historic Heritage Management Plan (HHMP)

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<sup>40</sup> see for example Barrett v Wellington City Council [2000] CP31/00)



- Lizard Management Plan (LMP)
- Tree Management Plan (TMP).
- Network Utility Management Plan (NUMP)

An additional management plan has been proposed for NoR 1 and NoR 3:

- Open Space Management Plan (OSMP) for NoR 1 and NoR 3

I note that Proposed Condition 7 Outline Plan states that the outline plans to be submitted may include an Ecological Management Plan. The Council's section 92 request for further information (refer **Attachment 1**) queried the reference to an Ecological Management Plan, as the Proposed Conditions did not include a condition setting out the objectives and content of an 'ecological management plan'. The Requiring Authority's response was that the reference to Ecological Management Plan in Proposed Condition 7 would be updated to 'Lizard Management Plan', as the only mitigation recommended in the South FTN NoRs supporting technical report on ecological impacts is for lizard management. Therefore, the Requiring Authority's Response stated, an Ecological Management Plan was not considered necessary. The issue of the need for an ecological management plan is discussed further in section 4.14.3 of this report.

Proposed Condition 8 Management Plans requires management plans to be submitted as part of an Outline Plan pursuant to section 176A of the RMA, with the exception of the Stakeholder Communication and Engagement Plan and the Construction Noise and Vibration Management Plan Schedules. As such, most of the management plans will be subject to Council consideration under section 176A, which allows a council to request changes to an Outline Plan before construction is commenced, and to appeal to the Environment Court if the requested changes are not adopted by the requiring authority.

Consideration of the South FTN NoRs must include addressing the effects of allowing the requirement and the ways in which any adverse effects will be mitigated by the Proposed Conditions. This consideration of necessity includes considering the structure, scope, adequacy and efficacy of each management plan offered by the requiring authority in the proposed conditions. Comment is made on these matters as appropriate in the following sections of this report.

## 4.3 Positive effects

### 4.3.1 Requiring Authority assessment

The positive effects of the South FTN NoRs are discussed within each of the environmental effects sections of the AEE.<sup>41</sup> Table 10-1 of the AEE provides a summary of positive and adverse effects, colour coded for construction/temporary effects and operational/permanent effects. Positive effects identified in Table 10-1 may be summarised as follows, with the positive effect being operational/permanent effect unless otherwise noted as a construction/temporary effect:

- **Traffic and Transport Effects** - improved provision for FTN bus services and walking and cycling along the corridors; improved access to rail stations via bus services; improved safety outcomes through improved walking and cycling facilities and removal of left turn slip lanes; improved freight connections along Popes Road (west) and on Great South Road, Drury to access the motorway at Drury; increased general traffic capacity from widening Great South Road, Drury and additional approach lanes at some intersections
- **Landscape and visual** - enhancement of streetscape character and improved visual amenity for road users and adjacent properties; and potential for planting within streetscape; increased walkability and cycling connectivity
- **Noise and vibration** - same or reduced operational traffic noise for majority of receivers
- **Aboricultural** - potential for an increase in tree canopy cover and improved quality of trees in the public realm through street tree planting
- **Terrestrial ecology** - ecological benefit from landscape planting adjacent to stream and riparian corridors; and new bridge structures replacing undersized structures will improve habitat connectivity for terrestrial and freshwater species.
- **Flooding** - improved culvert capacities; localised changes in road levels to reduce road flooding; and provision of stormwater treatment, water quality improvement, and retention / detention as part of the road corridors.
- **Social impacts** - designation provides certainty/indication of intent to improve transport; greater transport choice, improved connectivity and accessibility, safer road environment; opportunities for local employment during construction as a construction/temporary effect.

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<sup>41</sup> refer Sections 10.1 to 10.10 of the AEE

- **Property** – transport upgrades will integrate with and support existing development and planned growth; designations provide certainty about the form and location of the future transport network, the level of impact and ability to plan for the future with greater certainty; provide opportunities to integrate future infrastructure development; and ensure the development of infrastructure (i.e.: the Project) supporting future development is not precluded by incompatible development.

While Table 10-1 of the AEE does not identify any positive effects for archaeology and heritage, the Requiring Authority’s Assessment of Archaeological and Heritage Effects<sup>42</sup> states that positive effects are that archaeological investigations subsequent to encountering either known or unknown archaeological sites, would help provide information about the sites. This information, the Assessment of Archaeological and Heritage Effects says, could be presented to the public through interpretative panels or displays.

#### 4.3.2 Submissions

The positive effects of the South FTN NoRs identified in submissions include:

- Te Tāhuhu o te Mātauranga Ministry of Education stating support for the provision of transport choices and encouraging mode shift to sustainable transport modes as the population of South Auckland grows.
- Kāinga Ora Homes and Communities supports the outcomes to be derived from the Project particularly as they overall relate to the delivery of important transport infrastructure, with public transport and active modes supporting higher development densities and more travel choices.
- A submission noting the NoRs improves the safety of the intersection of Great South Road and Mahia Road, Manurewa
- Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN (Manurewa Business Association).
- Supports the development of efficient and accessible Rapid Transit Networks and Active Mode Corridors and road/highway networks which facilitate mode transfer and enable future urban growth (KiwiRail Holdings Ltd).

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<sup>42</sup> Te Tupu Ngātahi Supporting Growth, Assessment of Archaeological and Heritage Effects, October 2023, p54

### 4.3.3 Specialist Review of positive effects

#### 4.3.3.1 Traffic and Transport

Mr Wes Edwards, Council's consultant transport specialist, has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to transport and traffic matters (**Attachment 2**).

Mr Edwards comments that the Project has significant benefits in accommodating increased demand for travel generated by population growth. However, Mr Edwards notes, since the Requiring Authority's Assessment of Transport Effects (ATE) dated October 2023 was prepared, the Council's Future Development Strategy (FDS) has been adopted. Mr Edwards considers that because the FDS changes previous plans for growth in Greenfield areas of Takaanini and Drury (removing areas and restricting development until stormwater catchment management planning has occurred) the benefits outlined in the notified South FTN NoRs material are likely to be over-stated, particularly in the medium term. Mr Edwards identifies that this is an issue particularly in NoR 4 Porchester and Popes Road Upgrades.<sup>43</sup>

Mr Edwards also says that the beneficial transport effects of the Projects may be overstated due to the approach taken in the Requiring Authority's ATE to evaluate the effects of the Projects assuming that all planned growth would occur with or without the Projects. That approach, Mr Edwards says, does not align well with the FDS requiring some of the Projects being implemented as prerequisites to development in the growth areas.<sup>44</sup>

Mr Edwards sets out in Table 3 of his memo that the Takaanini FTN upgrade is identified as a transport infrastructure prerequisite for Cosgrave Road and Takaanini (red-flagged) growth areas of Takaanini;<sup>45</sup> and the Great South Road Upgrade is a transport infrastructure prerequisite for Drury West Stage 3.

In relation to the Requiring Authority's identification of positive effects of improved provision for FTN bus services and cycling along the corridors, Mr Edwards identifies that neither the Requiring Authority's project objectives nor the proposed conditions require the Requiring Authority to install bus lanes, cycle paths, or many other aspects of the Projects shown on the General Arrangement Drawings.<sup>46</sup>

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<sup>43</sup> Wes Edwards, Memo (technical specialist report to contribute to Council's section 42A hearing report), Notices of Requirement-South FTN-Transport Review, 22 February 2024, para 3.7 and 3.8

<sup>44</sup> Ibid, para 13.18

<sup>45</sup> Ibid, para 6.25 and Table 3. Table 3 also identifies that the timing of both areas is now not before 2050, whereas it was previously 2023-2027 for Cosgrave Road and 2043-2047 for Takaanini

<sup>46</sup> Ibid, para 4.5, p9 and para 5.7, p11

Mr Edwards cites the response of the Requiring Authority to the Council's section 92 request for further information for the bus lanes to be shown and this response notes that the allocation of road space is linked to an assumed level of service for buses and that the rationale for the additional road space would not exist if the bus services did not eventuate or were not funded. The Requiring Authority response also notes that bus lanes are not provided for in NoR 2 and NoR 4.<sup>47</sup>

In relation to safety outcomes, Mr Edwards expresses concerns about the safety of proposed cycle paths where they are crossed by numerous existing driveways in NoR 1, parts of NoR 3 and parts of NoR 4.

Mr Edwards also has concerns about the safety of active mode crossings at or near the NoR 4 Porchester Road / Popes Road intersection and about the NoR 4 Popes Road / Takanini School Road intersection. Mr Edwards asks that the Requiring Authority provide information in evidence for the hearing about options for addressing the safety aspects of the proposed cycle paths.<sup>48</sup>

Mr Edwards notes that changes to intersections may also improve travel times for all vehicles.<sup>49</sup>

#### **4.3.3.2 Noise and Vibration**

Mr Peter Runcie, Council's consultant noise and vibration specialist has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to noise and vibration (**Attachment 2**).

Mr Runcie identifies that no significant increases in traffic noise levels have been predicted in NoR 1 and NoR 2 and noise levels for some will be reduced; noise levels are predicted to increase by a noticeable margin for some of NoR 3 and noticeably decrease for others in NoR 3; and noise levels are predicted to increase by a just noticeable margin or reduce in NoR 4.<sup>50</sup>

However, Mr Runcie notes that no assessment of operational vibration has been provided by the Requiring Authority<sup>51</sup>.

#### **4.3.3.3 Landscape and visual**

Mr Rob Pryor, Council's consultant landscape and visual impacts specialist, has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to landscape and visual effects (**Attachment 2**).

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<sup>47</sup> Ibid, para 5.11, p11-12. See also para 8.14-8.16.

<sup>48</sup> Ibid, para 13.10, p89

<sup>49</sup> Ibid, para 8.59, p29

<sup>50</sup> Peter Runcie, Technical Memo, Table 2, p7-8

<sup>51</sup> Ibid, p8

Mr Pryor agrees with the Requiring Authority's assessment that the Project will involve upgrading the streetscape environment and implementation of street plantings will potentially enhance the landscape character of the surrounding environment.<sup>52</sup>

Mr Pryor is of the opinion that the stream margins proximate to the road bridges across the Otūwairoa and Hingaia streams will be enhanced through riparian planting which will enhance the visual amenity values of the area.<sup>53</sup>

Positive effects under the heading landscape and visual in the Requiring Authority's AEE also relate to urban design matters. Ms Lisa Mein, Council's consultant urban design expert has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to urban design matters (**Attachment 2**). Ms Mein notes and agrees with the Requiring Authority's urban design assessment that, while provision for active modes is a positive outcome, little space is provided for amenity planting and water sensitive design elements that support adaptation to climate change and that future design stages could consider opportunities to support these outcomes.<sup>54</sup>

Mr Leon Saxon, Council's consultant aboricultural specialist, has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to aboricultural effects (**Attachment 2**). Mr Saxon agrees with the Requiring Authority's assessment that there will be positive effects in increasing tree canopy cover along the road corridors of the NoR and the quality of street trees within the NoR.<sup>55</sup>

#### **4.3.3.4 Terrestrial Ecology**

Mr Simon Chapman, Council's consultant terrestrial ecologist, has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to terrestrial ecology matters (**Attachment 2**).

Mr Chapman makes comment that a key issue is the lack of specific requirements for addressing both loss of value and extent of stream/wetland habitat, including loss of riparian vegetation in NoR 1 and NoR 2.<sup>56</sup> Mr Chapman notes that Council's section 92 request for further information asked about incorporation of ecological considerations in bridge design including fish passages, and the response of the Requiring Authority was that this was a part of the future regional consenting phase.<sup>57</sup>

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<sup>52</sup> Rob Pryor, Technical Memo, para 5.53, p15

<sup>53</sup> Ibid, para 5.65, p16

<sup>54</sup> Lisa Mein, Technical Memo, para 7.10, p15-16; para 9.6, p20; para 11.6, p24

<sup>55</sup> Leon Saxon, Technical Memo, para 7.22, p8

<sup>56</sup> Simon Chapman, Technical Memo, p5

<sup>57</sup> Ibid, p7

Ms Antoinette Bootsma, Council's Senior Specialist - Earth, Streams and Trees, has reviewed the South FTN NoRs, AEE and technical assessments and submissions in relation to ecological effects (**Attachment 2**). Ms Bootsma makes comment that future regional consenting will involve the detailed culvert design and fish passage requirements, and loss of riparian vegetation.<sup>58</sup>

#### **4.3.3.5 Flooding**

Mr Trent Sunich, Council's consultant flooding specialist, has reviewed the South FTN NoRs, supporting AEE and technical assessments and submissions in relation to flooding effects (Attachment 2). Mr Sunich considers that the Requiring Authority has identified where there is an existing flood risk, and hence where the Project could exacerbate flooding.<sup>59</sup>

Mr Sunich notes that the Requiring Authority has proposed a suite of stormwater management devices for each of the South FTN NoRs, in line with current practice to address the effects of stormwater runoff from the impervious surfaces. This includes provision within each of the NoRs for construction and operation of stormwater management devices. Mr Sunich also notes that the Requiring Authority's flooding experts have indicated to him that the role of the flood hazard assessment at this time is to identify the designation area is sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques and stormwater management devices.<sup>60</sup>

Mr Sunich agrees the flood hazard and stormwater management mitigation aligns with good practice and includes providing additional piped drainage, keeping vertical alignment of road crests, and providing treatment and detention of road runoff.

#### **4.3.3.6 Social Impacts**

Dr Gillian Stewart, Council's consultant social impact specialist, has reviewed the South FTN NoRs, AEE and technical assessments and submissions in relation to social impacts (**Attachment 2**).

Dr Stewart generally agrees with the scope of matters addressed by the Requiring Authority's Social Impact Assessment (SIA),<sup>61</sup> including the assessment of the positive social impacts of the project, which Dr Stewart finds to be comprehensive and relevant.<sup>62</sup> However, Dr Stewart considers there are more positive impacts that can be facilitated through the designation and construction phases of the Project, specifically as a means to address and provide innovative solutions in the response to mitigate effects that will be adversely felt by some people.

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<sup>58</sup> Antoinette Bootsma, Technical Memo, para 5.6-5.7, p6

<sup>59</sup> Trent Sunich, Technical Memo, p3

<sup>60</sup> Ibid, p6

<sup>61</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network, Social Impact Assessment, October 2023 (SIA)

<sup>62</sup> Dr Gillian Stewart, Technical Memo, par 4.5, p6

Dr Stewart notes that the Council's section 92 request for further information asked for further information regarding job creation, education and training opportunities during construction, and noted that these potential positive effects are not reflected in the Proposed Conditions.<sup>63</sup> Dr Stewart also notes that the Project has the potential to generate positive social impacts, not just in the future delivery of a multi-modal transport network but also in the way it engages and works with the community and affected landowners, businesses, residents, and stakeholders to mitigate and manage its adverse effects.<sup>64</sup>

#### **4.3.3.7 Property**

Council's urban design specialist, Ms Mein, comments on the positive effects of how the transport upgrades will integrate with and support existing development and planned growth. Ms Mein notes that the South FTN NoRs present an opportunity to better connect communities throughout South Auckland and to support the extent of intensification envisaged along the Great South Road and Takaanini FTN corridors, in particular within walkable catchments of existing train stations and town centres.<sup>65</sup>

Ms Mein agrees with the Requiring Authority's urban design assessment identification of the need for an urban integration approach to redefine and integrate land to support adjacent land use, and agrees that this can be achieved through Proposed Condition 12 Urban and Landscape Design Management Plan (ULDMP).<sup>66</sup> Ms Mein does recommend amendment of the Proposed ULDMP Condition to include details about the interface and edge treatment of the works with adjoining properties (refer section 4.6.3 of below for discussion of this matter).

Mr David Russell, Council's development engineer specialist, has reviewed the South FTN NoRs, supporting documents and submissions in relation to construction and network utility operations. Mr Russell addresses matters of integration of the Project with future infrastructure development. Mr Russell recommends that the additional condition sought by utility operator submitters is made to the Proposed Conditions, to better coordinate the Project with the utility operator's infrastructure.<sup>67</sup>

#### **4.3.4 Planning assessment of positive effects**

I generally agree with the Requiring Authority's assessment of positive effects of the South FTN NoRs and acknowledge the positive effects of the NoRs as described in section 4.3.1 above.

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<sup>63</sup> Ibid, para 4.11, p7-8. Refers to further information request (SIA 9)

<sup>64</sup> Ibid, para 6.6, p21

<sup>65</sup> Lisa Mein, para 14.2, p33

<sup>66</sup> Ibid, para 7.10, p16

<sup>67</sup> David Russell, Technical Memo, para 4.2, p4



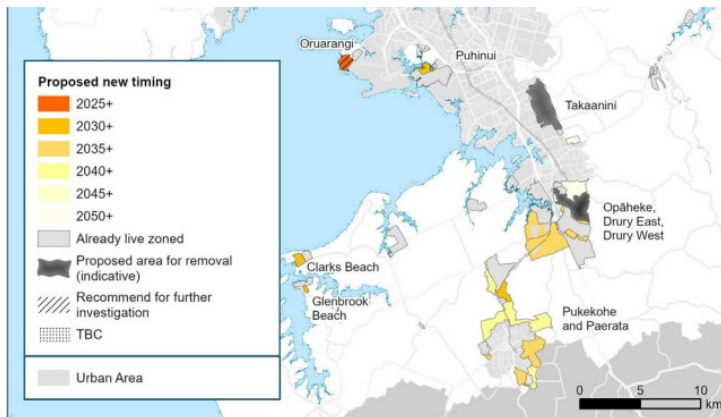
#### 4.3.4.1 Traffic and Transport

I rely on the expert opinion of Mr Edwards in relation to the positive traffic and transport effects of the South FTN NoRs. Mr Edwards has identified that the traffic and transport benefits may be over-stated as they appear to not recognise changes to the identification of and sequencing and timing of future development areas in the Council's FDS.

In that regard I note that the Consultation Draft FDS was approved by Council's Planning, Environment and Parks Committee (PEP Committee) on 4 May 2023 to go to public consultation. Public consultation was carried out between 6 June and 31 July 2023. On 2 November 2023 the PEP Committee adopted the FDS.

The Consultation Draft FDS, identified that the sequencing and timing of future development areas must be adjusted to reflect the realities of infrastructure funding and provision.<sup>68</sup>

The Consultation Draft FDS identified the Takaanini future development area and part of the Ōpaheke-Drury future development area as 'proposed for removal (indicative)',<sup>69</sup> as illustrated in **Figure 10** below:



**Figure 10 Extract of Figure 13-Future Urban Areas, Auckland Council Consultation Draft Auckland Future Development Strategy 2023-2053, June 2023**

The adopted FDS identifies the southern portion of the Takaanini future urban area for removal from identified future urban areas, due to the identified flooding hazards. The northern portion of the Takaanini future urban area has been identified as 'red flagged' due to the flood risks.<sup>70</sup> The adopted FDS identified the northern part of Ōpaheke as

<sup>68</sup> Auckland Council Consultation Draft FDS, p40. Appendix 7 of the Consultation Draft FDS discussed the reasons for removal of the whole of the Takaanini and a part of the Ōpaheke-Drury future urban areas and in summary the reasons related to flood plain extent and costs of flood mitigation, and hazards and risks.

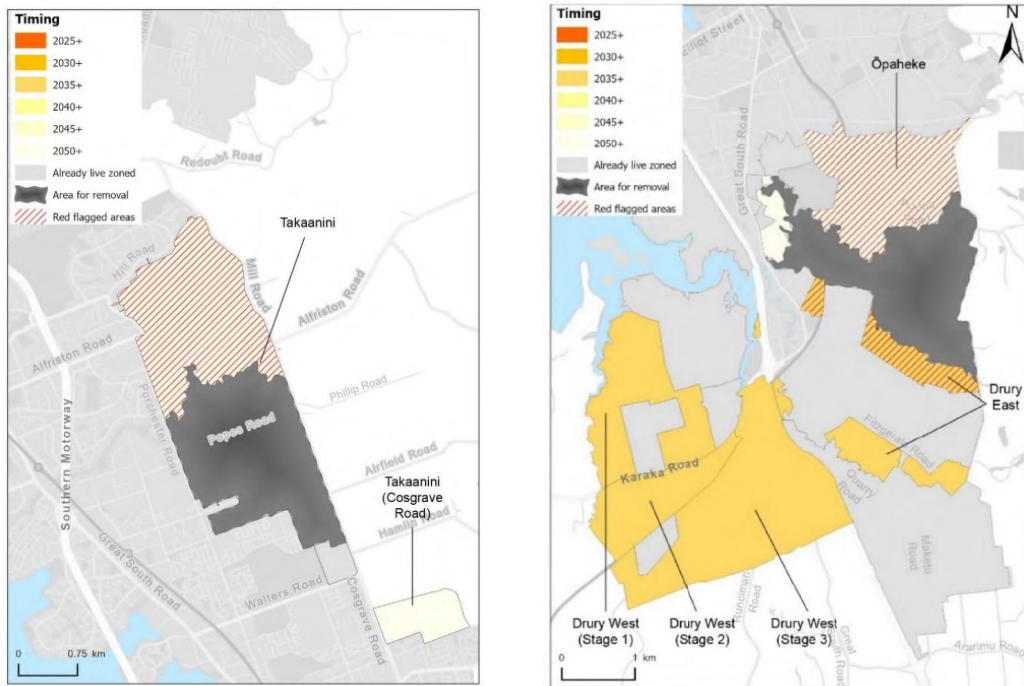
<sup>69</sup> Figures 13, 39, 43 and 44 of Auckland Council Consultation Draft Auckland Future Development Strategy 2023-2053, June 2023

<sup>70</sup> Auckland Council, Future Development Strategy, p50

being red-flagged and the southern part as an area for removal from the FUA. The requirements for red flagged areas include that an integrated catchment management approach is taken to development, in order to manage flood hazard risks.<sup>71</sup>

The FDS figures illustrating the FUA status and timing of development for Takaanini and Drury- Ōpaheke are duplicated in **Figure 11** below.

I note that Plan changes to implement the changes in status of areas the FDS identifies for removal or red-flagging, remain to be carried out and will be subject to the RMA processes before becoming operative changes to the AUP:OP.



**Figure 11 Takaanini and Drury- Ōpaheke FUA** (source: Figures 48 and 49, FDS, p51-52)

The changes in timing for development for the Takaanini and Drury- Ōpaheke areas are illustrated by a comparison of the FDS and FULSS<sup>72</sup>, as identified in Table 13 below:

**Table 13 Comparison of timing for future urban areas identified in FDS and FULSS**

Area	FDS	FULSS
Takaanini	<ul style="list-style-type: none"> <li>• North of Papakura Stream 'red flagged'</li> <li>• South of Papakura Stream area for removal from FUA</li> <li>• Bulk infrastructure for Takaanini is not planned to support development until 2050+</li> </ul>	<ul style="list-style-type: none"> <li>• Sequenced in the second half of the third decade (2043 – 2047)</li> </ul>

<sup>71</sup> Ibid, p56

<sup>72</sup> FDS, p50-52 and FULSS, p32-33

Area	FDS	FULSS
Takaanini (Cosgrave Road)	<ul style="list-style-type: none"> <li>• 2035+</li> <li>• Bulk infrastructure delivery for the Takaanini Cosgrave Road FUA is not planned to support development until 2050+</li> </ul>	<ul style="list-style-type: none"> <li>• 2023 - 2027</li> </ul>
Drury West	<ul style="list-style-type: none"> <li>• Drury West not already live zoned - 2035+</li> <li>• Bulk infrastructure for Drury West stage 1 and 3 (remainders) planned for 2035+</li> <li>• Bulk infrastructure for Drury West stage 2 planned for 2035+</li> </ul>	<ul style="list-style-type: none"> <li>• 2028 - 2032</li> </ul>
Ōpaheke / Drury	<ul style="list-style-type: none"> <li>• Ōpaheke –northern portion ‘red flagged’; southern and western portion removed from the FUA</li> <li>• Bulk infrastructure – Ōpaheke area planned for 2050+, and Drury East planned for 2035+</li> </ul>	<ul style="list-style-type: none"> <li>• 2028 - 2032</li> </ul>

My understanding from the Requiring Authority’s AEE is that the Consultation Draft FDS informed the spatial extent of the Project.<sup>73</sup>

Mr Edwards has identified that the Requiring Authority’s ATE does not take into account the changes made to future urban areas in the Consultation Draft FDS or final FDS. However, I note that the Requiring Authority’s Assessment of Alternatives states:

*Gap analysis and confirmation of optioneering scope identified that legislative and policy direction to enable increased housing supply, updates to AFC growth scenarios, and Private Plan Changes all signal that most areas around the Takaanini FTN Project area will continue to experience urban growth and place increased demand on the transport network. A small proportion of this increased demand in the very long term may be reduced if the removal of the Takaanini Future Urban Zone (FUZ) is confirmed as a result of Auckland Council’s Future Development Strategy (FDS)<sup>74</sup>*

I also note that the Requiring Authority’s ATE discusses that the regionally agreed land use forecasts prepared by Council via the Auckland Forecasting Centre (AFC) with the most recent available forecasts at the time of that assessment were used, and that revised land use forecasts reflecting any changes from PC78 and the FDS were not available at the time of preparing the ATE. The ATE states it is generally considered the Project is not inconsistent with policy direction, regarding supporting higher density urban development and for that reason the use of the available forecasts is considered acceptable for the assessment made in the ATE.<sup>75</sup>

The ATE also notes that the FDS has removed the southern portion of the Takaanini

<sup>73</sup> AEE, op.cit., See: Preferred Option and Concept Design, p35; Table 8-1 Lapse periods sought for NoRs and rationale for NoR 4, p40; Other Policy Considerations – Future Development Strategy (which identifies that Popes Road East has not been included in NoR 4 because of removal of Takaanini FUZ identified in the Draft FDS), p130.

<sup>74</sup> Supporting Growth, Appendix A Assessment of Alternatives, AEE, p39

<sup>75</sup> ATE, op.cit., p10

FUZ and partial removal of the Drury-Ōpaheke FUZ and says this has very little impact on the Projects as they serve existing developments and seek to resolve both existing and future issues.<sup>76</sup>

I consider it would be useful for the Requiring Authority to provide more details around how the changes made in the timing and FUA status in the FDS affect the positive effects of the South FTN NoRs, and whether those changes affect the need for the Project, or parts of the Project, or the expected date of implementation as relates to the requested extended lapse date for designations.

#### **4.3.4.2 Noise and vibration**

I rely on the expert opinion of Mr Runcie, in identifying that operational noise levels will remain the same or be similar for the majority of noise receivers, or reduce. I note that the positive operational noise and vibration effects of the *same or reduced operational traffic noise for majority of receivers* is a generalised statement. It appears to be based on buildings inside the area to be designated not being assessed, as the noise assessment assumes that these will be removed or not be a PPF due to repurposing to contain non-sensitive uses.<sup>77</sup> On that basis, I agree that the noise assessment identifies that for the majority of receivers the noise will remain the same or be less.

#### **4.3.4.3 Landscape and visual**

I rely on the expert opinions of Mr Pryor and Ms Mein in relation to landscape and visual positive effects, and agree with their conclusions and recommendations regarding positive landscape and visual effects.

#### **4.3.4.4 Ecology**

I rely on the expert opinion of Mr Chapman in relation to positive effects of the Project on terrestrial ecology. Mr Chapman's comments about riparian vegetation and the noting of the Requiring Authority's response to the request for further information regarding fish passages and riparian planting, means questions arise regarding the Requiring Authority's identification of positive effects of landscape planting adjacent to stream and riparian corridors and improving connectivity for freshwater species in the Papakura Stream, Otūwairoa stream/Slippery Creek and Hingaia Stream. Ms Bootsma has noted that these are matters that will be subject to regional consenting requirements.

I note that Proposed Condition 12 ULDMP requires (in clause (12(f)(i))) that a ULDMP be prepared and include details of how the Project will be designed to integrate with the natural environment. Proposed Condition 12 ULDMP also requires (in clause (12(h))) that planting details and maintenance requirements are provided including the

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<sup>76</sup> Ibid, p28

<sup>77</sup> Table 4-1 Buildings inside designation (not assessed), South FTN Assessment of Operational Noise Effects, p13.

treatment of fill slopes to integrate with adjacent land use, streams, riparian margins and open space zones. The stated objective of Condition 12 is, in summary, to enable integration of the project into the surrounding landscape and urban context, and to manage potential adverse landscape and visual effects and contribute to a quality urban environment. It is not clear whether the stated objective relates to terrestrial ecology or aquatic ecology matters.

It is therefore possible that the positive ecological effects of the South FTN NoRs are overstated in the AEE, or need some further details provided by the Requiring Authority in evidence at the hearing.

#### **4.3.4.5 Flooding**

As noted by Mr Sunich the Requiring Authority has proposed a suite of stormwater management devices for each of the South FTN NoRs in line with current practice to address the effects of stormwater runoff from the impervious surfaces. Relying on the expert opinion of Mr Sunich, I accept the Requiring Authority's identification of positive effects in that regard.

#### **4.3.4.6 Social Impacts**

I rely on and refer to the opinion of Dr Stewart in relation to positive social effects. I note that she recommends an additional new condition for a Development Response Management Plan with the objective, in part, to ensure that stated positive effects are achieved (refer section 4.8.3 below for discussion of this matter). Relying on the expert opinions of and subject to the recommendations made by Dr Stewart, I agree that there will be positive social effects resulting from the South FTN NoRs.

#### **4.3.4.7 Property**

Mr Russell and Ms Mein both agree that there are positive effects of the South FTN NoRs, and both suggest that to better achieve those positive effects new and amended conditions are needed. Relying on the expert opinions of and subject to the recommendations made by Mr Russell and Ms Mein, I agree that there will be positive effects of the transport upgrades proposed in the South FTN NoRs integrating with and supporting existing development and planned growth and integration of the Project with future infrastructure development.

Other positive property effects identified in the Requiring Authority's AEE are that the designations provide certainty about the form and location of the future transport network, the level of impact and ability to plan for the future with greater certainty. I agree with the identification of those benefits to some extent, while noting that the AEE identifies *the Project will be implemented as and when necessitated by growth and enabled by funding availability*<sup>78</sup> and this entails an element of uncertainty about the timing of the Project.

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<sup>78</sup> AEE, section 9.7, p51

I also qualify my agreement to the positive property effects by noting the large proportion of the submissions received to the South FTN NoRs relating to concerns with uncertainty about the ability to develop property directly affected by the NoRs. It is not apparent that the asserted positive effect of the South FTN NoRs in providing greater certainty of future development activities is demonstrated in the AEE or supporting technical assessments.

I agree that the South FTN NoRs will have the benefit of ensuring that the development of infrastructure (i.e.: the Project) will not be precluded by incompatible development, given that the written consent of the Requiring Authority is needed for any work within a notice of requirement or confirmed designation that would prevent or hinder the project or work to which the notice of requirement or designation relates under sections 178 and 176 of the RMA respectively.

With the noted qualifications, I acknowledge that the positive effects must be taken into account when considering any adverse effects on the environment.

#### **4.4 Traffic and Transport Effects**

Traffic and transport effects of the NoR are addressed in the Requiring Authority's ATE and in Requiring Authority's AEE, and in particular in Section 10.2 of the AEE. Council's consultant traffic and transport specialist, Mr Wes Edwards, discusses the actual and potential transport and traffic effects of the NoRs in his technical memo provided in **Attachment 2**. Submissions have also been considered and are referred to where relevant.

##### **4.4.1 Requiring Authority assessment**

The ATE considers the actual and potential transport effects associated with the construction and operation of the Project on the existing and likely future environment.

###### **4.4.1.1 Positive effects**

The positive effects identified by the Requiring Authority in the ATE and AEE are summarised in section 4.3.1 of this report.

###### **4.4.1.2 Traffic - Construction effects**

The AEE identifies that the majority of the construction work for the Project will be adjacent to or in operating road corridors, and that temporary traffic management will be required. Short-term temporary road closures for nights or weekend may be required. Speed limit restrictions may be implemented to maintain safety. Temporary diversions for pedestrians and cyclists are likely to be needed. Property access for residents and businesses may be affected and require temporary access provision.<sup>79</sup>

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<sup>79</sup> AEE, Section 10.2.3, p71-72

Traffic routes for construction vehicles are stated as being uncertain at this time and are likely to be limited to arterial corridors, State Highway 1 and those intersections with adequate vehicle tracking.<sup>80</sup>

The effects of potential bridge closures during construction in relation to the Otūwairoa Stream/Slippery Creek bridge (NoR 1) and Alfriston Road Bridge over SH1 (NoR 3) are discussed in Table 10-3 of the AEE. The discussion says that if the bridges are closed during construction then there would be public transport and walking and cycling connectivity impacts, and wider network effects. Effects would include detours for existing bus routes, pedestrians and cyclists, and general traffic.<sup>81</sup>

Safety impacts during construction are noted in Table 10-3 of the AEE for NoR 2 and NoR 3 as *potential increased safety risks at driveways and priority sections where additional lanes are proposed*.<sup>82</sup>

The Requiring Authority proposes to remedy or mitigate potential adverse construction effects through Proposed Conditions, including Proposed Condition 19 Construction Traffic Management Plan (CTMP), which requires a CTMP to be prepared prior to the start of construction of a stage of work. Any potential construction effects will be reassessed prior to actual construction commencing, taking into account the specific construction methodology and traffic environment at the time of construction.<sup>83</sup>

The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP will include:

- a) methods to manage the effects of temporary traffic management activities on traffic
- b) measures to ensure the safety of all transport users
- c) the estimated numbers, frequencies, routes, and timing of traffic movements, including any specific non-working or non-movement hours to manage vehicular and pedestrian traffic near schools or to manage traffic congestion
- d) the size of access routes and access points for all construction vehicles, the size and location of parking areas for plant, construction vehicles, and the vehicles of workers and visitors
- e) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including pedestrians and cyclists, on existing roads
- f) methods to maintain vehicle access to property and/or private roads where practicable, or to provide alternative access arrangements when it will not be maintained

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<sup>80</sup> Ibid

<sup>81</sup> Ibid, Table 10-3, p72

<sup>82</sup> Ibid

<sup>83</sup> Ibid, Section 10.2.5 p 74-75

- g) the management approach to loads on heavy construction vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads
- h) the methods that will be undertaken to communicate traffic management measures to affected road users e.g. residents, public, stakeholders, emergency services.<sup>84</sup>

The AEE recommends that the CTMP considers how public transport and active mode connectivity will be maintained if the Otūwairoa Stream/Slippery Creek bridge (NoR 1) is to be closed for construction; and how to maintain connectivity if Mill Road and/or the Ōpaheke N-S arterial corridors are not yet in the network.<sup>85</sup>

The AEE also recommends that the CTMP considers how a connection may be maintained for all modes across the Alfriston Road bridge during construction (NoR 3).<sup>86</sup>

#### **4.4.1.3 Traffic - Operational effects**

The AEE identifies<sup>87</sup> that potential operational transport effects were assessed using:

- Transport planning assessment of expected outcomes and effects;
- Transport modelling to inform demands and network performance; and
- Alignment with policy documents.

An assessment of each key element of the transport system was undertaken including effects on safety, each transport mode, parking, and property access.

The AEE notes that as this Project is not funded for immediate delivery, the assessment considered the likely future receiving environment that includes planned or expected changes to the existing land use and transport environment. Specifically, this includes urban growth as indicated in the AUP:OP.<sup>88</sup> The impacts of the Project on the future transport environment were assessed using forecasting transport models. The operational effects were considered in the likely future environment, against a baseline scenario where the Project does not exist. The AEE notes that the baseline scenario assumed the same growth scenarios and all other planned transport investments in the wider network.<sup>89</sup>

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<sup>84</sup> Ibid

<sup>85</sup> Ibid

<sup>86</sup> Ibid

<sup>87</sup> Ibid, section 10.2.1, p69

<sup>88</sup> Ibid

<sup>89</sup> Ibid, p70



The operational effects identified in the AEE include changes to traffic capacity from removal of free left turns at signalised intersections; reallocation of general traffic lane to bus lanes; widening of the road corridor from two lanes to four lanes at Great South Road, Drury in NoR 2; and additional approach lanes at intersections increasing intersection capacity.<sup>90</sup>

The AEE identifies that modelling with and without the Project indicates that there are some travel time “*disbenefits*” for general traffic resulting from the Project. However, for the majority of the route, this change is less than one minute or less than a 1% change. The AEE says the greatest effect can be seen between Manurewa to Manukau along Great South Road, where the increase in travel time is expected to increase to just under two minutes with the Project, which the AEE says is a minor effect.<sup>91</sup>

The AEE also notes that the modelling shows an estimated daily decrease of 54,800 Vehicle Kilometres Travelled (VKT) in 2048+ compared with the same model year without the Project, which is mainly attributable to the increase in mode share in public transport and active modes for local trips.<sup>92</sup>

Effects on existing and future access to properties are identified as an operational effect of the Project. The AEE states that the design philosophy has been to retain existing access wherever feasible. The AEE notes that the appropriate treatment of access arrangements will be determined during detailed design and prior to construction and Proposed Conditions will manage this effect.<sup>93</sup>

Effects on on-street and on-site parking are also identified in the AEE as operational effects of the Project. The removal of on-street parking is stated as being in line with Auckland Transport’s Parking Strategy and is therefore considered acceptable. The AEE states that due to the likely timing of the Project it is difficult now to ascertain with any certainty the operational impacts of removal of on-site parking. The AEE notes that the removal of on-site parking by the Project will not infringe any relevant standards, is consistent with the removal of all minimum parking requirements from the AUP:OP in accordance with the NPS-UD, and is therefore considered to be a minor adverse effect.<sup>94</sup>

The AEE identifies that there will be an increased safety risk at the intersection of Firth Street and Great South Road, Drury due to the raising of the bridge over the Hingaia Stream reducing the sight distance, and widening of the road increasing the crossing distance. The AEE notes that this adverse effect will be addressed through the signalisation of that intersection.<sup>95</sup>

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<sup>90</sup> Ibid, section 10.2.4, p73

<sup>91</sup> Ibid

<sup>92</sup> Ibid

<sup>93</sup> Ibid, p74

<sup>94</sup> Ibid

<sup>95</sup> Ibid and 10.2.5 Recommended measures to avoid, remedy or mitigate potential adverse effects, p75

The AEE says that a Proposed Condition requiring demonstration in the Outline Plan how safe access will be provided for each existing access that is altered by the Project will address operational adverse traffic and transport effects.

#### 4.4.2 Submissions

There are some 153 points of submission that raise transport issues relating to a number of key issues and property-specific issues. These may be categorised by key issue for each of the South FTN NoRs<sup>96</sup> as follows in Table 14.

**Table 14 Overview of Transport Issues Raised in Submissions by NoR**

Issue		Number of Submissions			
		NoR 1	NoR 2	NoR 3	NoR 4
Process	Sufficiency and Clarity of Information	5	2	3	3
	Need for the Project	6		9	5
	Alternative Routes, Methods, Designs, or Extents	11	6	6	5
Permanent Effects	Property Access	4	5	11	6
	On-Street Parking	1	2	2	1
	Off-Street Parking and Movement	2	3	8	3
	Efficiency	1		2	3
	Safety	3		5	5
Construction Effects	Property Access, Movement, Parking	2	1	4	4
	Management of Effects	4	2	2	1
	Efficiency, Road Closures			3	
Other			1	1	

Submissions on transport and transport matters are discussed in the following section of this report.

#### 4.4.3 Specialist assessment

Mr Wes Edwards, Council’s consultant traffic specialist, has reviewed the South FTN NoRs, supporting AEE and the associated technical reports including the ATE<sup>97</sup> and submissions that raise concerns regarding transport and traffic matters (**Attachment 2**).

In summary, Mr Edwards states that he has areas of concern with the South FTN NoRs, which are as follows:

*I have significant concerns about the potential for significant and widespread adverse effects on the efficient operation of the road network in the event the Slippery Creek, Hingaia Stream, Weymouth Road, or Alfriston Road bridges are closed during reconstruction. Closure of those bridges should be avoided except during periods of low traffic flow such as overnight or around New Years Day.*

<sup>96</sup> Wes Edwards, op. cit, Table 4, p63

<sup>97</sup> Te Tupu Ngātahi Supporting Growth, South FTN NoR Assessment of Traffic Effects, October 2023 (ATE)

*I have some concern that the recent changes to forecast growth in the FDS have reduced the need for some Projects, particularly NoR 3 and NoR 4, potentially to the point where those Projects are no longer reasonably necessary.*

*I have significant concerns about the safety of active mode crossings at or near the NoR 4 Porchester Road / Popes Road intersection and consider the assessment of alternative methods for this intersection is inadequate.*

*I have moderate concerns about the safety of the proposed changes at the NoR 4 Popes Road / Takanini School Road intersection and consider the changes are not reasonably necessary.*

*I have moderate concerns about the safety of cycle paths proposed for NoR 1, NoR 3, and parts of NoR 4, and that these paths could be contrary to the Project Objectives, raising concerns about the reasonable necessity of the requirements for additional land to provide the cycle paths.*

*I have moderate concerns about the reduction in safety arising from the removal of flush medians for NoR 1 and NoR 3 which provide safety benefits for pedestrians and for vehicles turning at side roads and driveways.*

*I have moderate concerns that some properties will have parking and/ or access removed by the NoR 3 Project that has not been identified or assessed in the notification material.*

*I have minor concerns that an appropriate range of alternate methods have not been considered for reducing the impact on some properties, for all of the NoRs. These include options for dealing with height differences including embankments, retaining walls and other structures.<sup>98</sup>*

Mr Edwards also raises concerns regarding the construction effects associated with the replacement of four bridges<sup>99</sup>, and the major adverse effects on the transport network that closure of any of those bridges would have on the transport network.<sup>100</sup>

Mr Edwards identifies concerns about the safety of proposed cycle paths where they are crossed by numerous existing driveways. The cycle paths (identified in the General Arrangement Drawings) are located relatively close to the road boundary where cyclists on the path and vehicles leaving a driveway may not have sufficient visibility of each other to provide for safe operation.<sup>101</sup>

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<sup>98</sup> Wes Edwards, op. cit., p89

<sup>99</sup> NoR 1 – Otūwairoa Stream /Slippery Creek bridge; NoR 2 – Hingaia Stream Bridge; NoR 3 – Alfriston Road bridge over SH 1, and Weymouth Road Bridge over NIMT railway.

<sup>100</sup> Wes Edwards, op.cit., para 3.14 – 3.19, p8

<sup>101</sup> Ibid, and para 8.40 – 8.57, p24-29

Mr Edwards notes that he considers the assessment of alternate routes and methods to be adequate for the Project at the macro scale. However, in his view additional investigation and assessment of alternative methods is warranted at a finer scale at some locations, such as at the Porchester Road / Popes Road intersection; and the option of shared cycle / pedestrian paths or fine-tuned dimensions for footpaths and cycle paths.<sup>102</sup>

As noted in section 4.3.3 of this report, Mr Edwards also raises concerns regarding the impact of the different development scales and timeframes in the FDS and the apparent use of the FULSS in the ATE.

Mr Edwards considers that the addition of bus lanes and additional lanes at intersections, as proposed in the NoRs, to be reasonably necessary to provide for forecast growth. However, Mr Edwards considers that given the changes made in the FDS the need for some of the Project is no longer clear, and he has recommended that the Requiring Authority provide more information about this matter at the hearing.

Given his concerns about cycle safety in NoR 1, NoR 3 and NoR 4, Mr Edwards has reservations whether the cycle path aspect of the Project is reasonably necessary. Mr Edwards also considers that the proposed changes to Popes Road / Takanini School Road in NoR 4 are not necessary.

As a result of the concerns, Mr Edwards has asked that the Requiring Authority provide evidence at the hearing in relation to a list of matters (refer section 13.9 – 13.14 of Mr Edwards' technical memo). In brief, those matters relate to:

- the impact of the different development scales and timeframes in the FDS compared to the FULSS on the form of and need for each Project;
- options for addressing the safety aspects of the proposed cycle paths and the necessity of requiring land to enable the implementation of those paths;
- impacts on submitters' property, access, off-street parking and manoeuvring, and options for avoiding, remedying or mitigating those effects for all NoR;
- clarifying the extent of bus lanes shown for NoR 1 in the Urban Design Evaluation (UDE) drawings and the ATE analysis;
- information about the form and road layout of the new bridge over the NIMT on Weymouth Road in NoR 3, and information about the effects of closure of that bridge and how those effects could be managed;
- information regarding the funding status, expected timing, and consenting status of the planned upgrade of the Norrie Road bridge, in relation to potential detour required if the Hingaia Stream bridge is closed during construction in NoR 2;

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<sup>102</sup> Ibid, para 3.20, p9 and para 7.1 – 7.19, p18-19

- options for reducing the extent of the designation and the impact on submitters' properties, including substituting retaining walls or other structures for embankments, and/ or substituting a shared path for separate walking and cycling paths at submitters properties;
- additional information around the assessment of alternative methods of providing active mode crossings near the Porchester Road / Popes Road intersection in NoR 4, and the effects of those methods on safety and efficiency and a review of the alternative land requirement footprints for a traffic signals option;
- additional information about the need for changing the Popes Road / Takanini School Road intersection to a roundabout and the safety issues around access to 94 Takanini School Road;
- assessment of the effects on Papakura Normal School from removal of on-street parking and measures proposed to address adverse effects.

#### **4.4.3.1 Submission assessment**

Section 11 and Appendix B of Mr Edwards' technical memo considers the submissions received on the South FTN NoRs that raise traffic or transportation issues (**Attachment 2**).<sup>103</sup>

Mr Edwards considers the submissions received on the South FTN NoRs in relation to the following key issues:<sup>104</sup>

- (i) Sufficiency and clarity of information - details of proposed medians, information regarding estimated bus patronage for the proposed bus lanes, identification of the bus lanes in the designation, extent of bus lanes, connectivity to Manurewa Town Centre and Southmall
- (ii) Need for the project – cycleways not used and not needed, withdraw as the Council is currently scrapping cycleway projects
- (iii) Alternative routes, methods, designs or extents – relocate road widening, remove NoR from property, early acquisition of property, improve intersection of Great South Road and Mahia Road, consider a shared walkway/cycleway
- (iv) Property access – design of medians, retention of right hand turns in and out of property
- (v) Loss of on-street parking – parking for residents, parking for customers of businesses, loss of loading spaces
- (vi) Loss and adverse effects on off-street parking and traffic movement on-site

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<sup>103</sup> Ibid, Section 11, p63-85

<sup>104</sup> Ibid, Section 11, p63-85

- (vii) Efficiency concerns - cycling path and bus stop already provided on Alfriston Road so the project is a waste of money
- (viii) Safety – of access and egress from property, proximity of road to houses
- (ix) Construction effects on property access, movement, parking, educational facilities
- (x) Management of construction effects – amendments to conditions
- (xi) Construction effects on transport efficiency and adverse effects of road closures
- (xii) Other – need for ongoing dialogue (KiwiRail)

Mr Edwards' assessment on the key issues raised in submissions may be summarised as discussed in the following paragraphs.

#### Property Access – Permanent effects

Mr Edwards considers the concerns raised in submissions regarding potential effects of the Project on property access. In relation to issues regarding details of proposed medians, Mr Edwards notes that the General Arrangement design drawings in the South FTN NoRs documentation show ambiguous median treatments which could be flush medians or raised islands, with decisions to be made in detailed design. Mr Edwards also notes that the drawings appended to the UDE show flush medians and islands differently.

Mr Edwards is of the opinion that while the information provided to date says that no locations have been identified where raised islands need to be installed,<sup>105</sup> it is his view there are some locations where the Project would significantly increase the probability of raised islands being introduced at a later time. Any such islands have would remove right turn movements at some driveways and some side roads.<sup>106</sup>

Mr Edwards makes recommendations in relation to existing property access in response to concerns raised by submitters regarding construction effects on property access, as discussed in section 4.4.3.2 below.

#### Bus lanes

In relation to confirming the extent and certainty of bus lanes being provided, Mr Edwards notes that bus lanes are enabled but not required by the South FTN NoRs.<sup>107</sup> Mr Edwards discusses that the Requiring Authority's response to Council's request for further information on this matter, confirmed that decisions around where and when bus lanes will be implemented will be made in the future in the interests of achieving a level of service for bus services.

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<sup>105</sup> Ibid, para 5.9, p11. The Requiring Authority response to Council's s.92 response is cited here by Mr Edwards.

<sup>106</sup> Ibid, para 1.4, p1

<sup>107</sup> Ibid, para 8.59, p29

Mr Edwards' understanding of the Requiring Authority's intention is that if appropriate levels of service for bus services can be achieved without bus lanes, because for example there is less traffic congestion than forecast, the additional road space would not be required at that time.<sup>108</sup> Mr Edwards notes that NoR 1 and NoR 3 are expected to improve the speed and reliability of the FTN bus routes in the area by enabling the provision of priority lanes for buses.<sup>109</sup>

### Southmall

In relation to issues raised in submissions regarding connectivity to Manurewa Town Centre and Southmall and property access concerns, Mr Edwards notes that Southmall is at 185 Great South Road and that property has vehicle access via Station Road at the north end, Great South Road, and Weymouth Road at the south end.<sup>110</sup> Mr Edwards notes that the existing flush median with a right turn bay for traffic entering the Southmall parking area from Weymouth Road is not shown on the South FTN NoRs concept plans and the General Arrangement drawings show a non-specific median and an opposing right turn lane across the Southmall entrance.

Mr Edwards is of the opinion that it is not clear from the information provided if right turn movements in or out of the Southmall driveway will be retained, or, if retained, that those movements could be made safely. If right turn movements are retained Mr Edwards expects that vehicles would be turning across two lanes where queuing is frequent, which is known to be hazardous.

If right turn movements in and out of this Southmall driveway are to be removed, and Mr Edwards considers the Project would make that highly likely, the effects of that change have not been assessed and measures to mitigate or otherwise manage those effects have not been provided. The same is true if this driveway is to be closed either permanently or during construction. Mr Edwards invites the Requiring Authority to provide more information on this matter for the hearing.

### Cycle Paths

Mr Edwards addresses issues raised in submissions regarding cycle paths, and notes that the Project proposes installation of cycle paths along both sides of the road on all Project sections. These paths are located between the footpath and the edge of the general traffic carriageway, usually with a grassed separator strip (berm) between the path and the road.<sup>111</sup> Mr Edwards considers the provision of cycle facilities to be desirable but raises concerns about the safety of the proposed cycle paths in NoR 1, NoR 3 and parts of NoR 4.<sup>112</sup> Mr Edwards asks the Requiring Authority to provide evidence at the hearing to address those concerns.

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<sup>108</sup> Ibid, para 8.15, p21

<sup>109</sup> Ibid

<sup>110</sup> Ibid, para 8.170, p40

<sup>111</sup> Ibid, para 8.40, p24

<sup>112</sup> Ibid, para 13.32, p93 and para 13.5, p89

Mr Edwards addresses the submission seeking that options such as a shared path be provided, rather than separate pedestrian and cycle paths. Mr Edwards considers that a shared path may produce more conflicts between pedestrians and cyclists, but may also reduce the speed of cyclists and improve safety at driveways. Mr Edwards recommends the Requiring Authority also address the suggestion of a shared path in evidence at the hearing. In the absence of that information, Mr Edwards' preliminary position is support for this submission point.<sup>113</sup>

#### Alternative Routes, Sites and Methods

Mr Edwards addresses the adequacy of the Requiring Authority's assessment of alternative routes, sites and methods and notes that the assessment is at a sub-regional level rather than considering localised issues, and has not considered alternatives at a per-property level. Mr Edwards notes that choosing between an embankment or a retaining wall is likely to occur during the detailed design stage and in consultation with affected property owners. However, Mr Edwards notes, in some cases those decisions will have a significant impact on effects, and he recommends additional consideration be given to alternative methods for undertaking the work for some submitters properties.<sup>114</sup>

#### On-Street Parking

Mr Edwards notes that the South FTN NoRs involve the permanent removal of on-street parking, and some involve the temporary or permanent removal of off-street parking. Mr Edwards also notes that the ATE considers there is likely to be sufficient supplies of parking in other locations, such as side roads, to address this. In Mr Edwards' opinion no data on side-road parking supply has been provided and no alternative methods of replacing or otherwise addressing the effects of loss of parking have been considered.<sup>115</sup>

Mr Edwards notes that Auckland Transport and Council have developed a Parking Strategy entitled "Room to Move", which explains that general vehicle parking is given the lowest priority for allocation of kerbside space, and that on the Strategic Transport Network movement will be prioritised over parking. Mr Edwards identifies that the strategy also says: *Where delivery of projects on AT's Strategic Transport Network requires the repurposing of road space dedicated to parking, AT's policy is to repurpose that space to the more beneficial use - unless there are exceptional circumstances.*<sup>116</sup> Mr Edwards identifies in this area the Strategic Network includes all of the project roads including Popes Road but excluding the section of Porchester Road north of Popes Road.<sup>117</sup>

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<sup>113</sup> Ibid, Appendix B, para B.8, p97

<sup>114</sup> Ibid, para 13.28, p93

<sup>115</sup> Ibid, para 7.19, p19

<sup>116</sup> Ibid, para 8.73, p30

<sup>117</sup> Ibid, para 8.74



Mr Edwards identifies that while the Room to Move Strategy assigns a low priority to on-street parking on arterial roads, the strategy does not address any effects that may arise from removal of parking.<sup>118</sup>

Mr Edwards considers that the loss of on-street parking outside Papakura Normal Primary School, within NoR 4, has not been identified or assessed by the Requiring Authority.

Mr Edwards is of the opinion that the effects arising from removal of on-street parking have not been adequately assessed or addressed in the application material. Mr Edwards recommend that the Requiring Authority provide evidence on this matter.<sup>119</sup>

#### Onsite Parking and Manoeuvring

Mr Edwards is of the opinion that the removal of parking or loading areas within the NoR and effects of the Project on manoeuvring, parking and loading areas outside of the NoR have not been assessed in the NoR assessments.<sup>120</sup> Mr Edwards considers that the ATE suggestion that impacts on private properties would be addressed when considering financial compensation at a later date, does not address any overflow effects outside of those properties, such as an increase in demand for parking in other areas.<sup>121</sup>

#### Safety

In relation to the submission that raises concerns about the loss of a safe distance between the submitter's house and the road, Mr Edwards notes that he considers the additional roadside area created by pedestrian and cycle paths and grassed area, to provide a greater space for a driver to recover control of an errant vehicle and he considers there to be less risk of a vehicle passing through a boundary fence. Mr Edwards considers any reduction in safety to be negligible.<sup>122</sup>

#### Construction Transport Effects

Mr Edwards identifies that the transport effects during construction would be similar to the impacts associated with similar road reconstruction works that are routinely undertaken across Auckland, which are appropriately managed by Construction Traffic Management Plans.<sup>123</sup> However, Mr Edwards notes that it is possible that one or more of the Projects could be constructed at the same time as another infrastructure project in the area, and that has the potential to increase cumulative effects. For example, Mr Edwards observes, if works on Mill Road or the Takaanini Level Crossings are undertaken at the same time the impact could be substantially greater.<sup>124</sup> Mr Edwards also has particular concerns regarding the traffic effects during the demolition of four

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<sup>118</sup> Ibid, para 8.78, p31

<sup>119</sup> Ibid, para 8.85, p31

<sup>120</sup> Ibid, para 8.86, p31

<sup>121</sup> Ibid, para 8.87-88

<sup>122</sup> Ibid, Appendix B, para B.37, p100

<sup>123</sup> Ibid, para 9.11, p53

<sup>124</sup> Ibid, para 9.4, p53

existing bridges and construction of replacement bridges.<sup>125</sup>

For the full discussion of the issues raised in submissions, Section 11 and Appendix B of Mr Edwards technical memo should be referred to (**Attachment 2**).

#### **4.4.3.2 Conclusions and recommendations**

Mr Edwards has identified that there are a number of matters that the Requiring Authority needs to address in evidence at the hearing in relation to effects and means of avoiding, remedying or mitigating adverse effects on submitters' properties. Mr Edwards has considered the matters raised in the submissions in forming his conclusions and recommendations.

Section 12.0 of Mr Edwards' technical memo recommends amendment to Proposed Conditions 15 Existing Property Access, and 19 Construction Traffic Management Plan (CTMP); and recommends new conditions relating to closure during construction of the Otūwairoa Stream/Slippery Creek Bridge (NoR 1), Hingaia Stream Bridge (NoR 2), Alfriston Road bridge across the Southern Motorway (SH1) (NoR 3) and Weymouth Road bridge across the NIMT (NoR 3).

To address concerns raised by submitters regarding retention of existing access to property, Mr Edwards recommends that Proposed Condition 15 Existing Property Access is amended by the addition of wording "fit for purpose". This wording is intended to ensure that the access that is required to be provided is adequate for all vehicles used at a property, such as large truck and trailer vehicles. The recommended amendment is as follows (additions shown in bold underlined):

##### Existing property access

Prior to submission of the Outline Plan, consultation shall be undertaken with landowners and occupiers whose vehicle access to their property will be altered by the project. The Outline Plan shall demonstrate how safe **and fit for purpose** reconfigured or alternate access will be provided, unless otherwise agreed with the landowner.

To address concerns raised by submitters regarding on-site parking and manoeuvring, Mr Edwards also recommends amendment to Proposed Condition 19 Construction Traffic Management Plan (CTMP) (additions shown in bold underlined, deletions shown as struck through):

##### Construction Traffic Management Plan (CTMP)

(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP shall include:

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<sup>125</sup> Ibid, para 9.12-9.38, p54-56

- (i) methods to manage the effects of temporary traffic management activities on traffic;
- (ii) measures to ensure the safety of all transport users;
- (iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours to manage vehicular and pedestrian traffic near **educational facilities** schools or to manage traffic congestion;
- (iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;
- (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including **public transport service**, pedestrians and cyclists;
- (vi) methods to maintain access to **and within** property and/or private roads where practicable, or to provide alternative access arrangements when it will not be;
- (vii) methods to maintain, as far as practicable, parking and loading areas within properties;**
- (viii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads;
- ~~(ix)~~ **ix**) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/\_public/stakeholders/\_emergency services);
- ~~(ix)~~ ~~auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;~~
- (x) details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and
- (xi) details of any measures proposed to be implemented in the event of thresholds identified in ~~(ix)~~ **(x)** being exceeded.

**(b) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version.**

To address his concerns regarding the potential adverse traffic effects of the possible closures of bridges that are to be replaced as part of the works enabled by the NoRs, Mr Edwards recommends a set of new conditions. The set of recommended new conditions all address Mr Edwards' concerns about the potential adverse traffic effects during the demolition of the four existing bridges and the construction of the new replacement bridges.

Mr Edwards notes that the ATE recommends that Otūwairoa Stream/Slippery Creek Bridge maintain connections for general traffic, public transport, and active modes at all times and that the ATE recommends the closure of the Otūwairoa Stream/Slippery Creek Bridge could be reviewed in the event the Mill Road and / or N-S Ōpaheke Arterial projects being operational.<sup>126</sup> Mr Edwards agrees with those recommendations of the ATE, but notes that they are not reflected in the proposed conditions.<sup>127</sup> Mr Edward explains that, in his opinion, it may be appropriate for the Otūwairoa Stream /Slippery Creek bridge to be closed during periods of low traffic flow, such as overnight and over the Christmas-New Year holiday period. Mr Edwards considers closure of the bridge may be appropriate at other times if alternative routes are operational at the time.<sup>128</sup>

The new condition and advice note that Mr Edwards recommends for NoR 1 in relation to the closure during construction of the replacement for the existing Otūwairoa Stream/Slippery Creek Bridge, is as follows:

Otūwairoa Stream/Slippery Creek Bridge

- (a) A connection across the Otūwairoa Stream /Slippery Creek with sufficient capacity for all vehicles and active modes shall be maintained in both directions at all times, except for:
  - (i) Overnight closures between the hours of 8pm and 6am; and
  - (ii) Closures between 27 December and 10 January.
- (b) If expanded or new alternate routes providing additional general traffic capacity between Drury and Papakura are operational at the time demolition of the existing Otūwairoa Stream/Slippery Creek bridge is due to commence, the closure periods may be extended subject to the preparation and certification by Council of a Detour Capacity Assessment Plan.

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<sup>126</sup> Ibid, para 12.7, p87

<sup>127</sup> Ibid

<sup>128</sup> Ibid, para 12.10, p87. Mr Edwards explains that the nature of the Mill Road project has changed and is now known as the MTAS project, which is not intended to increase north-south vehicle capacity. Mr Edwards also explains that the North-South Ōpaheke Arterial is not clearly defined in any formal documents. For that reason Mr Edwards' recommended condition relating to the Otūwairoa Stream /Slippery Creek bridge refers only to 'north-south arterial road general traffic capacity' and an advice note is proposed for further clarity.

- (c) The objective of the Detour Capacity Assessment Plan required by (b) in this condition is to avoid adverse effects on the safe and efficient operation of the transport network when the Otūwairoa Stream/Slippery Creek bridge is closed. To achieve the objective the Detour Capacity Assessment Plan shall provide:
- (i) proposed bridge closure schedule(s);
  - (ii) hourly traffic volumes currently crossing the bridge during the hours of proposed closure(s), including separately counted cyclists, light vehicles and heavy vehicles;
  - (iii) hourly traffic volumes using proposed detour routes and likely alternate routes during the hours of proposed closure(s);
  - (iv) projected traffic volumes on proposed detour routes and likely alternate routes during bridge closure(s);
  - (v) analysis of network efficiency, including modelling of key intersections, and analysis of mid-block locations and level crossings where the hourly volume of any individual movement is projected to increase by five percent or more; with output including projected average delay, and queue lengths on a per-movement basis;
  - (vi) analysis of impacts on road safety arising from increased traffic volumes on detour routes, including for active mode users;
  - (vii) details of any measures to address adverse safety or efficiency effects arising from the bridge closure(s); and
  - (viii) details of measures to address disruption, diversion, or other changes to public transport services;
- (d) The Detour Capacity Assessment Plan shall be submitted to Council for certification at least 20 working days prior to the commencement of demolition and/or construction work on the bridge; or
- (e) shall form a part of the CTMP that must be submitted to Council as a part of the Outline Plan required under condition 7.

Advice Note: Additional general traffic lanes on the Mill Road corridor and/ or a new north-south Ōpaheke arterial are expected to provide expanded or new alternate routes with additional general traffic capacity.

Mr Edwards notes that the ATE considers the detour route comprising Firth Street and Norrie Road would have sufficient capacity to accommodate traffic detoured by closure of the Hingaia Stream Bridge on Great South Road, provided that the Norrie Road bridge over the Hingaia Stream has been widened to two lanes.<sup>129</sup> Mr Edwards' recommended new condition for NoR 2 in relation to closure of the Hingaia Stream

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<sup>129</sup> Ibid, para 12.11, p88

bridge on Great South Road reflects the ATE's advice and also incorporates the same concerns as for the Otūwairoa Stream/Slippery Creek Bridge regarding the need for construction taking place during low traffic flows.

The new condition recommended by Mr Edwards in relation to the Hingaia Stream bridge within NoR 2 is as follows:

Hingaia Stream Bridge (Applicable to NoR 2 only)

- (a) A connection across Hingaia Stream at Great South Road with sufficient capacity for all vehicles and active modes shall be maintained in both directions at all times, except during the following times, provided the Norrie Road bridge is widened to two lanes:
  - (i) Overnight closures between the hours of 8pm and 6am; or
  - (ii) Closures between 27 December and 10 January.
- (b) Closure of the Hingaia Stream bridge shall be avoided at any time if the Norrie Road bridge has not been widened to two lanes.

Mr Edwards notes that the ATE considers the detour routes available if the Alfriston Road bridge over SH1 is closed during demolition and construction to have insufficient capacity and states that closure of this bridge should be avoided. Mr Edwards agrees and considers the proposed conditions need to address this issue.<sup>130</sup> Mr Edwards also notes that the ATE does not address the closure of the Weymouth Road bridge over the NIMT, and he considers that the same capacity issues of any potential detours would be likely, except during periods of low traffic flow.<sup>131</sup>

For those reasons, Mr Edwards recommends a new condition to apply to NoR 3, as follows:

Bridge Reconstruction (Applicable to NoR 3 only)

A two-directional connection across the Southern Motorway at Alfriston Road, and a two-directional connection across the North Island Main Trunk railway at Weymouth Road, with sufficient capacity for all vehicles and active modes shall be maintained at all times, except for:

- (a) Overnight closures between the hours of 8pm and 6am; or
- (b) Closures between 27 December and 10 January.

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<sup>130</sup> Ibid, para 12.13

<sup>131</sup> Ibid

In conclusion, in Section 13 of his memo, Mr Edwards says he:

- i) provisionally supports NoR 1 apart from the cycle path components and subject to his recommended amendment to conditions and recommended new condition relating to closure of the Otūwairoa Stream/Slippery Creek bridge during construction.
- ii) supports NoR 2 subject to his recommended amendment to conditions and recommended new condition relating to closure of the Hingaia Stream bridge during construction;
- iii) provisionally supports NoR 3 apart from the cycle path components, subject to possible design changes elsewhere to mitigate the effects to access arrangements, and subject to his recommended amendment to conditions and recommended new condition relating to the closure of Alfriston Road bridge over the Southern Motorway (SH1) and Weymouth Road bridge over the NIMT during construction;
- iv) provisionally supports NoR 4 apart from the cycle path components, the active mode crossings near the Porchester Road / Popes Road intersection, changes to the Popes Road / Takanini School Road intersection, and subject to his recommended amendment to conditions.

#### 4.4.4 Planning assessment

I rely on the expert opinion of Mr Edwards in making my planning assessment and recommendations.

I agree with the expert opinion of Mr Edwards that the Requiring Authority should address the concerns and queries raised in Mr Edwards' technical memo. Those matters include:

- Issues regarding the scale and timing of development in the FDS,
- safety concerns regarding cycle paths, and
- issues of concern to submitters being addressed satisfactorily by the Requiring Authority.

I agree with Mr Edwards' recommendation to address concerns raised by submitters regarding retention of existing access to property, by amendment to Proposed Condition 15 Existing Property Access to ensure that the access that is required to be provided is adequate for all vehicles used at a property. This amendment is included in the set of recommended amendments to proposed conditions (**Attachment 5**).

I agree with Mr Edwards' recommendation of amendments to Proposed Condition 19 Construction Traffic Management Plan (CTMP) to address concerns raised by submitters regarding on-site parking and manoeuvring. This amendment is included in the set of recommended amendments to proposed conditions (**Attachment 5**).

I rely on the expert opinion of Mr Edwards in relation to the need for conditions to avoid, remedy or mitigate the potential adverse traffic effects resulting from closure of the four bridges within the South FTN NoRs, during demolition and / or construction of the new replacement bridges.

I note that the Proposed Condition 19 CTMP states that the objective of the CTMP is to avoid, remedy or mitigate as far as practicable adverse construction traffic effects. 'Construction Works' is defined in the Proposed Conditions as 'activities undertaken to construct the Project excluding Enabling Works'. It might be assumed that demolition is involved in 'construction works'. However, it is not clear, and the Requiring Authority may wish to provide comment in their evidence, whether this 'construction' traffic management plan condition would also address traffic management issues relating to "demolition" of the four bridges.

I also note that Proposed Condition 19 CTMP includes (a)(v) as follows:

*(v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows...*

Proposed Condition 19(a)(v) does not stipulate pre-conditions for closure of the four bridges, whereas the new bridge conditions recommended by Mr Edwards do. For that reason, I agree with Mr Edwards that new conditions are appropriate, rather than expanding 19(a)(v) to add to the matters that the CTMP would need to address.

I agree with the recommendations made by Mr Edwards for new conditions to apply to NoR 1 in relation to the closure of the Otūwairoa Stream/Slippery Creek Bridge, in NoR 2 in relation to the Hingaia Stream bridge, and in NoR 3 in relation to the two bridge closures, Alfriston Road bridge across SH 1 and Weymouth Road bridge over NIMT.

The recommended new conditions are included in the set of recommended amendments to proposed conditions (**Attachment 5**)<sup>132</sup>.

A consequential addition to the Abbreviations and definitions section of the Proposed Conditions is required to provide certainty as to the meaning of 'certification' of the Detour Capacity Assessment Plan, which is a new requirement under the new condition relating to the replacement of the Otūwairoa Stream/Slippery Creek Bridge.

I consider it is appropriate to use similar terms to those already used in the Proposed Conditions, in relation to certification of material changes to management plans, for the definition of certification in relation to the Detour Capacity Assessment Plan, as follows:

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<sup>132</sup> Note: Attachment 5 renumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.



Acronym/Term	Definition
Certification of Detour Capacity Assessment Plan	Confirmation from the Manager that a Detour Capacity Assessment Plan has been prepared in accordance with the condition to which it relates. A Detour Capacity Assessment Plan shall be deemed certified: (a) where the Requiring Authority has received written confirmation from Council that the Detour Capacity Assessment Plan is certified; or (b) ten working days from the submission of the Detour Capacity Assessment Plan where no written confirmation of certification has been received.

I include the above-noted amendments in the set of recommended amendments to proposed conditions (**Attachment 5**).

In conclusion, I consider that it is appropriate that the Requiring Authority provides a response at the hearing on matters that include:

- the relief sought in the submissions and Mr Edwards assessment of the submissions
- the matters identified by Mr Edwards
- the recommendations and conclusions in Mr Edwards' assessment and
- the amendments to the Proposed Conditions that I recommend.

## 4.5 Noise and vibration effects

Noise and vibration effects are addressed in Section 10.4 of the AEE and associated technical reports, Assessment of Construction Noise and Vibration Effects<sup>133</sup> (Construction Noise Assessment) and Assessment of Operational Noise Effects<sup>134</sup> (Operational Noise Assessment).

### 4.5.1 Requiring Authority assessment

#### 4.5.1.1 Positive Traffic Noise and Vibration Effects

Positive traffic noise effects identified by the Requiring Authority are discussed in section 4.3.1 of this report above.

<sup>133</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network Assessment of Construction Noise and Vibration Effects, October 2023

<sup>134</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network Assessment of Operational Noise Effects, October 2023

#### **4.5.1.2 Construction Noise and Vibration Effects**

As noted earlier in this report, the existing environment for the Requiring Authority's assessment of effects is identified by existing zoning in the AUP:OP. The receiving environment is identified as the planned environment with expected changes through PC78 and implementation of the NPS-UD expected to lead to densification around Te Mahia and Takaanini stations.<sup>135</sup>

##### Construction Noise

Construction noise levels have been assessed in the Construction Noise Assessment using the method recommended in NZS 6803 in accordance with the AUP:OP.<sup>136</sup> As construction of each transport corridor is expected to last for more than 20 weeks, the "long-duration" noise limits are identified as applicable.<sup>137</sup> Buildings inside the boundaries of the South FTN NoRs are assumed to be removed and therefore effects on those buildings have not been assessed.<sup>138</sup>

Various construction activities and equipment are identified in the Construction Noise Assessment as noise sources on site during construction works.<sup>139</sup> Construction vibration sources and indicative distances from the source of vibration where vibration criteria will be met are identified.<sup>140</sup>

The Construction Noise Assessment identifies within NoRs 1, 3 and 4, due to the setback distances for most of the proposed works and the use of equipment with lower source noise levels for large portions of the work, mitigated noise levels can comply with the 70 dB  $L_{Aeq}$  noise criterion for most of the construction work.<sup>141</sup> It also identifies that with mitigation in place, the most affected receivers, which are some 2m away from the construction boundary, could still receive intermittent noise levels up to 90 dB  $L_{Aeq}$  when works are immediately adjacent.<sup>142</sup>

The Construction Noise Assessment identifies that within NoR 2 the most affected receivers could still receive intermittent noise levels of up to 85 dB  $L_{Aeq}$  when works are immediately adjacent. However, the Construction Noise Assessment notes, due to the setback distances of some 4m at the closest, for most of the proposed works and use of equipment with lower source noise levels for large portions of the works, mitigated noise levels can comply with the 70 dB  $L_{Aeq}$  noise criterion for most of the construction work.<sup>143</sup>

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<sup>135</sup> Construction Noise Assessment, p17-19.

<sup>136</sup> Assessment of Construction Noise and Vibration Effects, p7

<sup>137</sup> Ibid

<sup>138</sup> Ibid, p11. See also 'Table 4-1 Buildings inside designation areas (not assessed)', p11-12.

<sup>139</sup> Ibid, p12-16

<sup>140</sup> Ibid, p16-17

<sup>141</sup> Ibid, pvii

<sup>142</sup> Ibid, pvii

<sup>143</sup> Ibid, pvii-viii

The Construction Noise Assessment identifies that exceedances of recommended construction noise standards for brief period of time are common for most large-scale construction projects, and such intermittent exceedances are anticipated by NZS 6803 and the AUP:OP as not unreasonable, as long as the Best Practicable Option (BPO) has been applied to the management and mitigation of the construction noise.<sup>144</sup>

### Construction Vibration

The Construction Noise Assessment states that the main objective of controlling construction vibration is to avoid vibration-related damage to buildings, structure and services and any adverse effects of construction vibration on human comfort would typically only be experienced for short durations.<sup>145</sup> The guidelines and standards used in the Construction Noise Assessment are identified in Table 3-4 of that report and are stated as being based on the AUP:OP.<sup>146</sup>

The AUP:OP criteria for amenity and addressing human perception of vibration levels are set out in Table 6-2 of the Construction Noise Assessment and this identifies that the AUP:OP sets the criteria for amenity to 2 mm/s PPV during the day for large construction projects generating vibration.<sup>147</sup> The potential effects indoors of 2 mm/s PPV are described in Table 6-2 as *vibration would clearly be felt. However, it can typically be tolerated in indoor environments such as offices, houses and retail if it occurs intermittently during the day and where there is effective prior engagement.*

The Construction Noise Assessment identifies vibration levels above 5mm/s Peak Particle Velocity (PPV), exceeding the daytime Construction B criterion, may be experienced by some 74 existing dwellings and 14 *commercial type* buildings within NoR 1, one *commercial type* building within NoR 2, some 76 existing dwellings and 12 *commercial type* buildings within NoR 3, and some 98 existing dwellings and one *commercial type* building within NoR 4, if a roller compacter is used on the construction boundary. Therefore, the Construction Noise Assessment recommends the use of non-vibratory compaction equipment within 8m of buildings.<sup>148</sup>

### Bridge Replacements

The Construction Noise Assessment discusses the replacement of the Otūwairoa Stream/Slippery Creek Bridge within NoR 1 and identifies that this is the noisiest activity proposed in this NoR and that this activity will only be for a limited duration and the noise will be intermittent.

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<sup>144</sup> Ibid, p8-9

<sup>145</sup> Ibid, p9

<sup>146</sup> Ibid, p10

<sup>147</sup> Ibid, p24

<sup>148</sup> Ibid, pvii-viii

The Construction Noise Assessment states the worst-case situations where mitigated noise levels could reach 90 dB  $L_{Aeq}$  at the closest receivers, are not expected to be frequent, due to the setback distances to most of the proposed works and the use of equipment with lower source noise levels for large portions of the works. It is therefore predicted that mitigated noise levels can comply with the 70 dB  $L_{Aeq}$  noise criterion for most of the construction works.

A list of existing properties where exceedance of the 70 dB  $L_{Aeq}$  daytime noise criterion is predicted is provided in Appendix A of the Construction Noise Assessment.

The Construction Noise Assessment states, in discussion of NoR 1, that if a critical activity has to be carried out during the night-time in close proximity to residential receivers (e.g. bridge construction works), consultation and mitigation measures will be essential.

The Construction Noise Assessment says the use of noisy equipment should be avoided, where practicable, to prevent sleep disturbance and that any night-time works are likely to be limited in duration and will be managed through the CNVMP and a Schedule to the CNVMP.<sup>149</sup>

Discussion in the Construction Noise Assessment of the works within NoR 2 and 3 does not refer specifically to the bridge replacements within those NoR.<sup>150</sup> However, works requiring road closures at night are referred to.<sup>151</sup>

#### Mitigation of Construction Noise and Vibration

The Construction Noise Assessment identifies that construction noise and vibration can be mitigated and managed through Proposed Condition 22 Construction Noise and Vibration Management Plan (CNVMP) to generally comply with the applicable noise and vibration criteria across all NoRs.<sup>152</sup> The Construction Noise Assessment notes that exceedances of the criteria could occur intermittently over a short duration if high noise or vibration generating equipment is used adjacent to occupied buildings and suggests that any future buildings will need to be assessed at the time of construction and mitigation and management determined through the CNVMP. The Construction Noise Assessment states that where an exceedance is predicted at any receiver that exists at the time of construction, the effects will be mitigated and managed through the CNVMP and site specific or activity specific construction noise and vibration management schedules.<sup>153</sup>

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<sup>149</sup> Ibid, p25

<sup>150</sup> NoR 2 – Hingaia Stream bridge on Great South Road; NoR 3 Alfriston Road bridge over Southern Motorway and Weymouth Road bridge over NIMT railway.

<sup>151</sup> Assessment of Construction Noise, op.cit., p27- 29

<sup>152</sup> Ibid, pviii

<sup>153</sup> Ibid, pviii

Where a noise exceedance is predicted at any receiver that exists at the time of construction, the effects will be mitigated and managed through the CNVMP. In addition, a site specific or activity specific management Schedules to the CNVMP may be required where noise and/or vibration limits are predicted to be exceeded for a more sustained period or by a large margin. The objective of the Schedule is to set out the 'Best Practicable Option' measures to manage noise and/or vibration effects of the construction activity that might be required on some properties beyond those measures set out in the CNVMP.

#### **4.5.1.3 Operational Traffic Noise effects**

The AEE identifies that road traffic noise effects have been assessed in accordance with NZS6806: 2010 Acoustics – Road Traffic Noise-New and Altered Roads (NZS6806).<sup>154</sup> That assessment included computer noise modelling for a:

- (i) Do-nothing scenario: assuming the current road layout with traffic volumes at the design year of 2048 assuming full development of surrounding areas; and
- (ii) Do Minimum scenario: assuming the Project (all NoRs) is in place at the design year 2048, as well as full development of surrounding areas.<sup>155</sup>

The Operational Noise Assessment identifies that traffic vibration from well-constructed and maintained roads is not an issue that causes adverse effects, and as vibration effects are not anticipated, road traffic vibration is not assessed.<sup>156</sup>

The Operational Noise Assessment identifies that most of the Project does not meet the definition of an Altered Road in NZS6806, as the noise levels due to the Project do not change to a noticeable degree, and, therefore, mitigation does not need to be considered further under NZS6806.

The Operational Noise Assessment identifies existing Protected Premises and Facilities (PPFs), which are described in the AEE as:

*PPFs include dwellings (including those that have building consent but are not built yet), educational facilities and their playgrounds within 20m of any school building, boarding houses, retirement villages, Marae, hospitals with in-patient facilities and motels/hotels in residential zones.*<sup>157</sup>

Appendix A of the Operational Noise Assessment identifies by street address the existing noise levels for PPFs, and the modelled noise levels under the 'Do nothing scenario' and the 'Do minimum scenario' and identifies those predicted to fall into

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<sup>154</sup> AEE, p81

<sup>155</sup> Ibid

<sup>156</sup> Assessment of Operational Noise Effects, October 2023, p16

<sup>157</sup> AEE, p81 footnote 10. The Proposed Conditions define PPF as: *Protected Premises and Facilities as defined in New Zealand Standard NZS 6806:2010: Acoustics-Road traffic noise – New and altered roads.*

Categories A, B and C.<sup>158</sup>

Maps in Appendix B of the Operational Noise Assessment identify the location of the dwellings identified as PPFs, identifying NZS6806 Category A buildings in green, Category B buildings in orange and Category C buildings in red.<sup>159</sup> The Operational Noise Assessment notes that any buildings shown on the maps in Appendix B that are not shown in one of these three colours are outside the assessment area, or are not PPFs e.g. garages, sheds or business premises.<sup>160</sup>

Noise contour plans are also shown in Appendix B to the Operational Noise Assessment, which show interpolated noise level bands at 5 decibel intervals from 55 dB to 70 dB LAeq(24hr).<sup>161</sup>

The Operational Noise Assessment concludes that implementation of the South FTN NoRs is predicted to result in no noticeable noise level changes across the majority of PPFs. It says that while some PPFs are predicted to receive noise level increases, overall, with mitigation in place, noise levels at the vast majority of PPFs will be lower with the Project implemented than would have been the case without.<sup>162</sup>

The Operational Noise Assessment concludes that NoR 1 and NoR 2 require no further noise mitigation under NZS 6806 as all PPFs are predicted to receive noise levels in Category A.<sup>163</sup>

Mitigation was considered for NoR 3, however a low-noise road surface is already implemented along the length of this NoR and noise barriers were not found to be effective at any Category B or C PPFs.<sup>164</sup> The Operational Noise Assessment recommends that noise barriers be reassessed at all Category B and C PPFs in NoR 3 at the time of detailed design to determine if they represent the BPO.<sup>165</sup>

The Operational Noise Assessment concludes NoR 4 requires some mitigation, which was assessed in the form of roadside barriers or boundary fences. The conclusion notes that while some noise level reduction is predicted assuming this mitigation, and the vast majority of PPFs are predicted to receive noise levels in Category A, a small number would still receive noise levels within Category B and C (unchanged from a scenario if the Project is not implemented). The Operational Noise Assessment says where barriers may be practicable for Category B and C PPFs, these will be assessed at the time of detailed design to determine if they represent the BPO.<sup>166</sup>

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<sup>158</sup> Appendix A, Operational Noise Assessment, p55-101. Categories A, B and C are defined in accordance with NZS6806

<sup>159</sup> Appendix B, Operational Noise Assessment

<sup>160</sup> Operational Noise Assessment, p15

<sup>161</sup> Ibid

<sup>162</sup> Ibid, p54

<sup>163</sup> Ibid

<sup>164</sup> Ibid

<sup>165</sup> Ibid, p53

<sup>166</sup> Ibid, p54

For any PPFs predicted to receive noise levels in Category C once the BPO mitigation has been determined, the Operational Noise Assessment recommends that building modification is investigated at the implementation of the Project.<sup>167</sup>

The Proposed Conditions include Condition 29 Low Noise Road Surface; a set of definitions for the operational traffic noise conditions, including that PPFs means only the premises and facilities identified in green, orange or red in Schedule 4 PPFs Noise Criteria Categories; and Condition 30 to 41 regarding mitigation of operational traffic noise.

#### 4.5.2 Submissions

There are 34 points of submission that raise matters in relation to noise and vibration. The matters raised include the following concerns:

- signalisation at an existing intersection will increase noise received
- increased traffic noise will create sleep disturbance
- traffic noise will increase due to the road moving closer to the submitter's house
- noise and vibration during construction and effects on amenity and health, including on vulnerable residents
- noise and vibration, noting existing vibration effects exist
- increased noise due to additional traffic lanes
- vibration effects in peat soil conditions
- whether predicted noise levels and mitigation identification are accurate given differences in traffic volume predictions in NoR 2 and NoR 4
- mitigation of future road noise in consented apartment building

The following submissions to all four NoRs, raise issues regarding traffic noise and vibration:

##### *Kāinga Ora Homes and Communities*

The submission by Kāinga Ora Homes and Communities seeks:

- To require mitigation be provided to all properties exposed to levels of 55 dB LAeq(24h) or greater with reference to evidence prepared by Ms Drewery;<sup>168</sup>

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<sup>167</sup> Ibid

<sup>168</sup> Mr Runcie identifies in his memo (refer Attachment 2) that Ms Drewery is the reviewer of the South FTN NoRs' Assessment of Operational Noise Effects and Assessment of Construction Noise and Vibration.

- That Operational Conditions are amended to address BPO for PPF identification and assessment that recognises the receiving environment as it exists at the time;
- That low noise road surfaces are required on all roads within the designations; and
- Building modification to be required for all properties likely to receive internal road traffic noise levels greater than 40 dB LAeq(24h).

#### *Ministry of Education*

The submission by the Ministry of Education raises concerns regarding potential construction noise and vibration effects at education facilities. The submission seeks a CNVMP with specific wording related to engagement with education facilities should exceedances be identified as likely.

### **4.5.3 Specialist assessment**

Peter Runcie, Council's consultant noise and vibration specialist, has undertaken a review of the South FTN NoRs, AEE, associated technical reports and submissions in relation to noise and vibration (**Attachment 2**).

#### **4.5.3.1 Construction noise and vibration**

Mr Runcie considers that a consistent approach has been taken to the assessment of construction noise and vibration across all four NoR and that the identified noise limits, based on the requirements of the AUP:OP and NZS 6803: 1999 *Acoustics – Construction Noise* are appropriate for the proposed construction activities.<sup>169</sup>

Mr Runcie is of the opinion that construction vibration arising from night-time works when people are sleeping is an amenity impact that should be a key concern, in addition to the management of construction vibration to avoid vibration-related damage to structures.<sup>170</sup>

Mr Runcie notes that the Construction Noise Assessment identifies that receivers within 76m of unmitigated works could experience levels greater than the daytime noise criterion (70 dB LAeq) and receivers within approximately 20m of works may be subject to vibration levels greater than the AUP:OP daytime vibration amenity criterion (2 mm/s PPV).<sup>171</sup> Mr Runcie is concerned that the proposed Category B night time construction vibration criteria of 2 mm/s PPV is twice as permissive as that within the

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<sup>169</sup> Peter Runcie, Technical Memo, 26 February 2024, para 3.2, p3

<sup>170</sup> Ibid, para 3.3, p3

<sup>171</sup> Ibid, para 3.4



Waka Kotahi guidelines.<sup>172</sup>

Mr Runcie considers reasonable the proposed process to manage construction noise and vibration effects, including creation of a CNVMP, and Schedules to manage and mitigate noise and vibration where exceedance of the limits is identified.<sup>173</sup>

Mr Runcie identifies that if works take place on the construction boundary, with mitigation in place, construction noise levels up to 85-90 dB LAeq are predicted to occur intermittently at the closest receivers. Mr Runcie is of the opinion that:

*At this level, indoor effects would broadly fit in the following Table 6-1 description "Untenable for both office and residential environments. Unlikely to be tolerated for any extent of time." This would potentially result in needing the works to take place while the properties are unoccupied via arrangement with the occupants. The description of potential noise effects in 7.1.1, 8.1.1, 9.1.1 and 10.1.1 of the assessment somewhat underplays these potential effects<sup>174</sup>.*

#### **4.5.3.2 Submission assessment – Construction Noise and Vibration**

In relation to submissions that raise concerns with construction noise and vibration effects, Mr Runcie provides the comment that the proposal sets out the limits and how construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects, and he considers this to be a reasonable approach.<sup>175</sup>

Mr Runcie has made comment in relation to the Ministry of Education submission seeking a CNVMP condition with specific wording related to engagement with education facilities should exceedances of construction noise and vibration levels be identified as likely at education facilities. Mr Runcie is of the opinion that the process requested is already provided for in the Proposed Conditions in a way that would include education facilities, and he does not consider a change to the condition wording in this respect to be necessary.<sup>176</sup>

In relation to the submission by Accessible Properties Limited (regarding 59-59C Alfriston Road) concerned with construction noise and vibration, Mr Runcie comments that Proposed Conditions 22 CNVMP and 23 Schedule to a CNVMP already set out the framework for communication and engagement with nearby residents and stakeholders and includes preparation of schedules when levels exceed the standards. Mr Runcie notes that reducing the noise limit is likely to increase the duration of works through limiting the available hours to undertake the works, which could result in greater adverse effects than completing the works quicker.

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<sup>172</sup> Ibid. The reference to the Waka Kotahi guideline is provided in footnote 1 of Mr Runcie's Technical Memo, p3

<sup>173</sup> Ibid, para 3.10, p4

<sup>174</sup> Ibid, Table 1, p4

<sup>175</sup> Ibid, Table 4, p9-14

<sup>176</sup> Ibid

Mr Runcie also notes that based on the noise contours, existing road traffic noise levels at 59C and 59B are in the region of 55 – 65 dB LAeq(24h), and therefore it is likely the occupants are already exposed to elevated noise levels due to proximity to Alfriston Road. Mr Runcie is of the opinion that there may be benefit in noting the particular sensitivity of this receiver location in the Conditions such that engagement is appropriately focussed, if this can be included in a schedule or other means within the conditions of consents.

Mr Runcie provides comments on the submission raising concerns about vibration in peat soil conditions and notes that the limits and how construction noise and vibration will be required to be managed by way of a CNVMP applies irrespective of the soil type. Mr Runcie notes that should soil type materially impact the level of vibration from the works this would be required to be considered within the CNVMP and Schedules.<sup>177</sup>

**4.5.3.3 Recommendations – construction noise and vibration**

Mr Runcie recommends amendment of Proposed Condition 21 Construction Vibration Standards to address his concerns regarding amenity effects on occupied residential properties during the night-time period. The recommended amendments include lowering the Category B PPV from 2 mm/s PPV to 1 mm/s PPV. Amendments are as follows, with additions shown in bold underlined and deletions shown as struck through:

Construction Vibration Standards

- (a) Construction vibration shall be measured in accordance with ~~ISO 4866:2010 Mechanical vibration and shock – Vibration of fixed structures – Guidelines for the measurement of vibrations and evaluation of their effects on structures~~ DIN4150-3:1999 and shall comply with the vibration standards set out in the following table as far as practicable.

**Table 21.1 Construction vibration criteria**

Receiver	Details	Category A	Category B
Occupied Activities sensitive to noise	Night-time 2000h - 0630h	0.3mm/s ppv	<del>1</del> 2mm/s ppv
	Daytime 0630h - 2000h	2mm/s ppv	5mm/s ppv
Other occupied buildings	Daytime 0630h - 2000h	2mm/s ppv	5mm/s ppv
All other buildings	At all other times	Tables 1 and 3 of DIN4150-3:1999	

~~\*Category A criteria adopted from Rule E25.6.30.1 of the AUP~~

~~\*\*Category B criteria based on DIN 4150-3:1999 building damage criteria for daytime~~

<sup>177</sup> Ibid, Table 4p13

- (b) Where compliance with the vibration standards set out in Table 21.1 is not practicable, the methodology in Condition 23 shall apply.

#### **4.5.3.4 Operational noise**

Mr Runcie is of the opinion that the Operational Noise Assessment has applied the appropriate standard for the assessment of road noise, being NZS6806.<sup>178</sup> He agrees that the modelling approach, inputs and software used are appropriate for assessing effects at this stage of the NoR.<sup>179</sup> However, Mr Runcie notes that the criteria for assessment of traffic vibration is not provided in the Operational Noise Assessment and considers this to be a potential weakness in that assessment.<sup>180</sup> Mr Runcie is of the opinion that if avoiding potential adverse traffic vibration effects is reliant on creation and maintenance of a smooth road surface, then the conditions should include this matter.<sup>181</sup>

Mr Runcie notes that for NoR 3 and NoR 4 the Operational Noise Assessment says that 'a low noise road surface' is already implemented in the Do Minimum design, but it is unclear whether a higher performing road surface was considered as mitigation, and so Mr Runcie recommends that the road surface is also re-assessed at the time of detailed design. Mr Runcie considers that the use of a higher performing low noise road surface (such as a porous asphalt type subject to being suitable from a safety and engineering perspective) may be sufficient to significantly reduce the number of PPFs in Category B, and potentially C.<sup>182</sup>

Mr Runcie notes that in relation to future PPFs, there is a reliance on new development addressing road noise. However, Mr Runcie notes that the means for how this information would be provided is not clearly set out in the Assessment. Mr Runcie also notes that consideration of traffic noise as part of new developments containing PPFs is not a requirement in the AUP:OP or the building consent process, so there is a chance that this potential effect would not be addressed as the area is developed.<sup>183</sup>

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<sup>178</sup> Ibid, para 4.1, p5

<sup>179</sup> Ibid, para 4.4, p5

<sup>180</sup> Ibid, para 4.2

<sup>181</sup> Ibid, para 4.12, p8

<sup>182</sup> Ibid, Table 2, p7-8

<sup>183</sup> Ibid, para 4.14, p9

#### **4.5.3.5 Submission assessment - operational noise**

Mr Runcie makes comment on the submission by Binay Singh (NoR 1 – 2.3) concerned with increased traffic noise resulting from proposed signalisation at the intersection of Great South Road and Park Estate Road. Mr Runcie is of the opinion that the introduction of signalisation would be unlikely to change the overall noise levels compared to free-flowing road conditions by a perceptible amount. Mr Runcie notes that while vegetation can provide a psychological barrier from road traffic noise, vegetation at least 10m deep and 2-3m high is typically required to make a perceptible measurable difference to traffic noise.<sup>184</sup> Mr Runcie does not recommend any amendment of the Proposed Conditions or modification of NoR 1 to address the concerns of this submitter.

In relation to submissions raising concerns about increased noise levels being experienced due to the road being closer to houses (submissions NoR 1- 16.3 Howe; NoR 1 – 19.3 Govender), Mr Runcie notes that at those properties, changes in noise levels are predicted to be an imperceptible 1 dB increase due to the proposed road surface and other changes proposed.<sup>185</sup> In relation to the submission to NoR 3 by Umaria (submission NoR 3-18) concerned with increased traffic noise due to added lanes, Mr Runcie notes that the Operational Noise Assessment identifies that there will be an imperceptible increase in road noise, and the Proposed Condition 29 Low Noise Road Surface is appropriate to mitigate those effects.<sup>186</sup>

Mr Runcie has made comment on the operational traffic noise and vibration points of submission by Kāinga Ora Homes and Communities:

- (i) Mitigation be provided to all properties exposed to levels of 55 dB LAeq(24h) or greater

Mr Runcie acknowledges that there is international guidance (as noted in the submission) which indicates external levels of 50-55 dB LAeq(24h) to be preferable for road noise at residential receptors for the avoidance of moderate annoyance within populations and the avoidance of potential adverse health effects. Notwithstanding this, Mr Runcie notes the assessment provided in the Operational Noise Assessment report is in accordance with NZS 6806. Mr Runcie is of the opinion that as this is the standard required for the assessment of road traffic under the Auckland Unitary Plan (standard E25.6.33), it therefore meets the expectations for road traffic noise in Auckland.

- (ii) That Operational Conditions are amended to address BPO for PPF identification and assessment that recognises the receiving environment as it exists at the time. The amendments sought to Proposed Conditions 31, 32 and 33 are set out in Appendix 1 of the Kāinga Ora Homes and Communities and include that a new clause be added to each of those Conditions as follows:

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<sup>184</sup> Ibid, Table 4, p10

<sup>185</sup> Ibid

<sup>186</sup> Ibid, p12-13

*A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.*

Mr Runcie notes that in relation to future PPFs, there is a reliance on new development addressing road noise without the mechanisms in place to ensure that this happens.<sup>187</sup> Mr Runcie is of the opinion that future dwellings, constructed prior to detailed design, warrant consideration in terms of noise effects.<sup>188</sup> Mr Runcie, therefore, recommends that the Proposed Conditions be amended to include a requirement for the future BPO assessment to determine the BPO for the environment that is present prior to construction starting, to ensure the most appropriate source noise mitigation measures are identified and able to be incorporated into the design.

Mr Runcie states that he considers it is a pragmatic approach that the Requiring Authority should not be responsible for acoustically treating dwellings which are constructed following the lodgement of the NoRs, provided the future road noise level information is made clearly and easily available.

(iii) That low noise road surfaces are required on all roads within the designations

Mr Runcie notes that Proposed Condition 29 requires low noise road surfaces and all applies for all designations. Mr Runcie recommends some minor amendments to that condition to better address potential vibration effects.

(iv) Building modification be required for all properties likely to receive internal road traffic noise levels greater than 40 dB LAeq(24h).

Mr Runcie notes that the relief sought by the submitter represents a significant departure from the required standard (NZS 6806) which only requires at property mitigation from altered road noise levels greater than 67 dB LAeq(24h). However, he notes that it is not uncommon for such a requirement to be adopted (and proposed by Auckland Transport or Waka Kotahi) for the avoidance of reverse sensitivity in the instance of new residential subdivisions adjacent to existing noisy roads or state highways. For further context, Mr Runcie notes that Appendix A of the Operational Noise Assessment identifies that most PPFs predicted to be exposed to levels greater than 55 dB LAeq(24h) under the Do Minimum scenario already experience similar levels of noise. Therefore, Mr Runcie asks the submitter clarify what level of change they would consider sufficient to warrant such mitigation.

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<sup>187</sup> Ibid, para 4.14, p9

<sup>188</sup> Ibid, para 4.15

In relation to submissions concerned with vibration from traffic, Mr Runcie has noted that the assumption made in the Operational Noise Assessment that the road surface will be smooth needs to be ensured through a low noise road surface condition, and he has made a recommendation for amendment to Proposed Condition 29. Mr Runcie also suggests that should a more robust requirement be preferred, this could be achieved through setting performance requirements for vibration (such as is done for noise) based on the Standard adopted by Waka Kotahi (NS 8176.E : 2ED 2006 Vibration and Shock – Measurement of Vibration in Buildings from Land based Transport and Guidance to Evaluation of its Effects on Human Beings).<sup>189</sup>

#### **4.5.3.6 Recommendations - operational noise**

To address his concerns regarding consistency between the noise and vibration effects of the as-built road and the effects assumed as part of the Operational Noise Assessment, Mr Runcie has recommended amendments to Proposed Condition 29 Low Noise Road Surface for all of the South FTN NoRs.<sup>190</sup> The recommended amendments are shown below with additions in bold underlined and deletions shown as struck through:

Low Noise Road Surface

(a) Asphaltic concrete surfacing (or equivalent low noise road surface) shall be implemented within 12 months of Completion of Construction of the project.

**(b) The road surface shall be designed, implemented and maintained to be smooth and even to avoid adverse vibration generated from traffic passing over uneven surfaces.**

~~(c) (b)~~ Any future resurfacing works of the Project shall be undertaken in accordance with the Auckland Transport Reseal Guidelines, Asset Management and Systems 2013 or any updated version and asphaltic concrete surfacing (or equivalent low noise road surface) ~~shall be implemented. where~~

- ~~(i) The volume of traffic exceeds 10,000 vehicles per day; or~~
- ~~(ii) The road is subject to high wear and tear (such as cul-de-sac heads, roundabouts and main road intersections); or~~
- ~~(iii) It is in an industrial or commercial area where there is a high concentration of truck traffic; or~~

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<sup>189</sup> Ibid, para 4.12, p8

<sup>190</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

- ~~(iv) It is subject to high usage by pedestrians, such as town centres, hospitals, shopping centres and schools.~~
- ~~(e) Prior to commencing any future resurfacing works, the Requiring Authority shall advise the Manager if any of the triggers in Condition 24(b)(i) – (iv) are not met by the road or a section of it and therefore where the application of asphaltic concrete surfacing (or equivalent low noise road surface) is no longer required on the road or a section of it. Such advice shall also indicate when any resealing is to occur.~~

Mr Runcie has recommended that the Proposed Traffic Noise Condition (Unnumbered condition before Condition 30 from NoR 1) be amended to reflect that the figures in Schedule 4 of the Proposed Conditions identifies all PPFs in a single colour, and by the addition of an exceptions clause, as follows (additions shown in bold underlined, deletions show as struck through):

Traffic Noise

- (a) for the purposes of Conditions 30 to 41:

...

- (f) Identified Noise Criteria Category – means the Noise Criteria Category for a PPF identified in Schedule 4: Identified PPFs Noise Criteria Categories;

- (g) Mitigation – has the same meaning and in NZS 6806 Acoustics- Road traffic noise – New and altered roads;

...

- (j) Protected Premises and Facilities (PPFs) – means only the premises and facilities identified in **pink** green, orange or red in Schedule 4: PPFs Noise Criteria Categories;

...

- (m) Notwithstanding the above applying to the PPFs in Schedule 4, conditions 30 to 41 shall be read as also including a requirement for the future BPO assessment to determine the BPO for the environment that is present prior to construction starting (in terms of road surface, barriers, or other source noise mitigation), noting that the Requiring Authority is not responsible for acoustically treating dwellings that are constructed following the lodgement of the NoR.**

Mr Runcie has suggested an alternative to the above-noted recommended amendments to the Traffic Noise Condition, would for the means of disseminating the noise contours in Schedule 4 of the Proposed Conditions to be addressed.<sup>191</sup>

Mr Runcie has asked the submitter Kāinga Ora Homes and Communities to provide information to the hearing regarding the relief sought that building modification be required for all properties likely to receive internal road traffic noise levels greater than 40 dB LAeq(24h) and has suggested that discussion between the Requiring Authority, Council, and the submitter may be appropriate.<sup>192</sup>

#### **4.5.4 Planning assessment**

I rely on and refer to the expert opinion of Mr Runcie in making my planning assessment.

##### **4.5.4.1 Construction Noise and Vibration**

I rely on Mr Runcie's expert opinion that amendment of Proposed Condition 21 Construction Vibration Standards is necessary to address his concerns regarding amenity effects on occupied residential properties during the night-time period and recommend the amendment he suggests as set out in section 4.5.3.3 above in the set of recommended amendments to proposed conditions (**Attachment 5**).

Mr Runcie is of the opinion that the process requested in the Ministry of Education submission, seeking a CNVMP condition with specific wording related to engagement with education facilities, is already provided for in the proposed conditions in a way that would include education facilities. I rely on his expertise in agreeing with his conclusion that amendment of the Proposed Condition 22 CNVMP as requested in the submission is not necessary.<sup>193</sup>

Mr Runcie is of the opinion that there may be benefit in noting the particular sensitivity of the receiver at 59-59C Alfriston Road as raised in the submission by Accessible Properties Ltd to NoR 3. Mr Runcie suggests an amendment to the Proposed Conditions may ensure such that engagement is appropriately focussed, if this can be included in a schedule or other means within the conditions of consents. I agree with Mr Runcie and am of the opinion that the issues raised relate to communication during the construction of the Project would be best addressed in Proposed Condition 9 Stakeholder Communication and Engagement Management Plan (SCEMP).

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<sup>191</sup> Ibid, para 4.17, p9

<sup>192</sup> Ibid, p12

<sup>193</sup> Ibid



Proposed Condition 9 SCEMP has an objective of identifying how the public and stakeholders will be engaged with prior to and through construction works and matters to be addressed in the SCEMP include (ii)E: *methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays to the parties identified in the SCEMP.*

I also note that Proposed Conditions 22 CNVMP and 23 Schedule to a CNVMP set out a process whereby sites where the construction noise and vibration limits will not be met are addressed in a Schedule to the CNVMP, which will identify the BPO measures to mitigate construction noise and vibration.

The Proposed Conditions rely on the management plans to be prepared closer to the time of the works to identify those properties that may need mitigation of adverse construction noise and vibration, and this appears to be a reasonable approach, given that the sensitivity of affected occupants may have changed between now and the time of construction in 10 to 15 years (according to the requested lapse periods for the NoRs). It would be helpful for the Requiring Authority to address the issues raised by the submitter in evidence to the hearing, including whether they consider amendments to the Proposed Conditions should be made to better address the concerns of the submitter.

#### **4.5.4.2 Bridges**

In section 4.4.4 above, relying on the expert transport opinion and advice of Mr Edwards, I have recommended new conditions to address potential adverse traffic effects arising during demolition and construction work on the four bridges to be replaced within the South FTN NoRs. Those new conditions require that connections be maintained in both directions except during overnight closures between the hours of 8pm and 6am and closures between 27 December and 10 January.

The result of these new recommended conditions may be a greater likelihood for night time demolition and construction work on the four bridges, and the Requiring Authority may wish to comment in the hearing whether this would be the case.

The potential adverse noise and vibration effects of a potentially greater occurrence and duration of night time demolition and construction activity have not been addressed in assessments, and those potential effects are a matter that needs to be examined in the course of the hearing. The Requiring Authority may also wish to address this matter in the hearing.

The Construction Noise Assessment assumes that buildings inside the boundaries of the NoR are to be removed and therefore effects on noise sensitive activities in those buildings have not been assessed.<sup>194</sup> However, this raises the question of whether adverse construction noise and vibration effects on houses that are not removed, due to changes made in the detailed design of the Project, will be appropriately avoided, remedied or mitigated. It would be helpful if the Requiring Authority could address the likelihood of this situation eventuating and clarify whether there are potential adverse effects that have not been addressed and appropriately avoided, remedied or mitigated.

#### **4.5.4.3 Operational Noise and Vibration**

Mr Runcie has highlighted that the Operational Noise Assessment is not thorough in its consideration of potential effects for future dwellings, which he considers should be addressed. Mr Runcie has recommended amendments to the Proposed Conditions so that the environment that is present prior to construction starting is assessed to determine the BPO for noise mitigation. However, his recommendations include limiting the mitigation to source noise mitigation and not including mitigation that would involve the Requiring Authority acoustically treating dwellings constructed after lodgement of the South FTN NoRs.

I agree with Mr Runcie that the Proposed Conditions as relate to operational noise will only manage noise effects on the receivers that existed at the time Schedule 4 to the Proposed Conditions was prepared and were identified as existing PPFs. As proposed, the operational noise Conditions mean that there will limited noise mitigation for receivers that will be adversely affected by operational traffic noise (i.e. activities sensitive to noise<sup>195</sup>), that have been established between preparation of Schedule 4 and when the Project is constructed. Mitigation of operational traffic noise for those 'new' receivers will be limited to Proposed Condition 29 Low Noise Road Surface. The 'new' receivers will be expected to have been cognisant of the Project, and to have been designed and constructed in a way that avoids or mitigates the effects of existing and future road traffic noise.

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<sup>194</sup> Ibid, p11. See also 'Table 4-1 Buildings inside designation areas (not assessed)', p11-12.

<sup>195</sup> The Proposed Conditions in Appendix C to Form 18 for the South FTN NoRs includes a definition of 'activity sensitive to noise', which includes any dwelling and a list of other activities. That term is used in Proposed Condition 20 Construction Noise Standard.

I note that objectives and policies of the AUP:OP include those in E25 Noise and Vibration. Objective E25.2 includes that: *people are protected from unreasonable levels of noise and vibration; That amenity values of residential zones are protected from unreasonable noise and vibration, particularly at night; Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.*

<sup>196</sup>

Policies in E25 include: *prevent significant noise-generating activities other than roads and railway lines from establishing in or immediately adjoining residential zones; require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on existing and authorised infrastructure.*

The noise and vibration objectives and policies of the AUP:OP set a policy framework which accepts road traffic noise will occur, and encourages avoidance, remedy or mitigation of reverse sensitivity effects on authorised infrastructure. However, the mechanisms to achieve the avoidance of reverse sensitivity effects in relation to road traffic noise are limited in the AUP:OP. Regardless, it is the conditions applying to a designation that will determine whether adverse environmental effects of the works authorised by the designation are avoided, remedied or mitigated and not district plan rules in the AUP:OP. In that regard, I note that consideration of the South FTN NoRs is subject to Part 2 of the RMA, including the avoidance, remedy or mitigation of adverse environmental effects.

For those reasons, I agree with Mr Runcie that amendments are needed to the Proposed Conditions to better address the mitigation of adverse operational noise effects on noise receivers that are present at the time of construction of the NoRs, and which are not identified in Schedule 4.

Mr Runcie's recommendation goes some way to address the issue created by the Proposed Conditions treating the receiving environment as including only the PPFs identified in Schedule 4, despite other parts of the South FTN NoRs identifying that the receiving environment at the time of construction and operation of the Project will be different. This is difficult to understand as the very rationale for the Project is that there will be residential intensification and development that necessitates the transport improvements that the Project seeks to achieve.

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<sup>196</sup> AUP:OP, E25.2 Objectives (1), (2), (3).

Mr Runcie's recommended amendment to the operational noise conditions would not require receivers that are not listed in Schedule 4 of the Proposed Conditions (i.e. constructed after preparation of Schedule 4 by the Requiring Authority) to be acoustically treated even if after BPO source noise mitigation (e.g. low noise road surface) the noise levels remain higher than the level at which acoustic treatment would be required if they were identified as Category C PPF. However, I recognise that Mr Runcie's recommended amendment is a pragmatic approach, which goes beyond what NZS6806 requires and seeks to achieve a degree of RMA mitigation of adverse noise effects.

While I understand that it may be the Requiring Authority's intent that new dwellings and other noise sensitive activities take into account the existing and predicted road noise environment in their design, there is a problem in that the information regarding the predicted traffic noise levels will not be easily available. Proposed Condition 3 Land Use Integration Process requires a point of contact be provided for a *Developer or Development Agency* to request or provide information to integrate their development plans or master planning with the designation. This includes that a Developer or Development Agency may request information on how to access traffic noise modelling contours to inform adjacent development.

The terms 'developer' and 'development agency' are defined in the Proposed Conditions, so it would seem that the limitation of the applicability of Condition 3 is intentional.

Proposed Condition 3 does not appear to adequately address adverse noise effects within the predicted noise contours, in relation to the intensification, development, and land use change that is expected to take place within the existing urban areas of the South FTN NoRs over the next 10-15 years or longer. Proposed Condition 3 also relies on the noise modelling contours being requested by developers or development agencies, and not proactively provided or made widely available. I note that the noise contours extend beyond sites within or adjacent to the South FTN NoR corridors and the extent of the NoRs themselves.

Council's section 92 request for further information asked why Proposed Condition 3 was limited to the defined 'developers' and 'development agencies' and the Requiring Authority response was that Proposed Condition 2 Project Information was the source of relevant information for people others than the entities included in Condition 3.<sup>197</sup>

Proposed Condition 2 Project Information is to provide information about the status of the Project, construction timeframes, contact for enquires, implications of the designation, a subscription service for project updates and when and how to apply for s.176 consent. There is no indication that the predicted noise level information would be provided on that Project Information website.

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<sup>197</sup> Te Tupu Ngātahi Supporting Growth, Response to Request for further Information in accordance with section 92 of the Resource Management Act 1991 for the South Frequent Transit Network Project, 10 November 2023, P6 p2-3

Without a better means of ensuring that anyone wishing to build, for example, an extra bedroom onto their house has full knowledge of the predicted operational traffic road noise arising from the Project, the effects of that noise will go unmitigated on those 'new' receivers. Mr Runcie has suggested that this issue could be remedied by better means of disseminating the noise contours in Schedule 4 of the Proposed Conditions, and that this is a matter that should be addressed.<sup>198</sup> It would be helpful for the Requiring Authority to address that matter in evidence at the hearing.

I am of the opinion that the Proposed Conditions leave a gap in ensuring that the receiving environment is properly recognised and noise effects are avoided, remedied or mitigated, particularly given the length of the lapse period for the South FTN NoRs and the expected timing of when construction will occur. I am also concerned that there may be gaps in the identification of existing PPFs in Schedule 4, as it appears that resource consents granted for residential activities and not yet implemented may not have been identified as PPFs.

My understanding is that under NZS 6805, PPFs include dwellings that have building consent but are not built yet. However, applying this definition strictly to identification of effects and measures to avoid, remedy or mitigate adverse effects would lead to gaps in the identification of the receiving environment, which in RMA terms includes resource consents that have been granted and that are likely to be implemented.

The submission NoR 4 – 16 Alda Investments refers to resource consent that has been granted for two four-level apartment blocks at 164-166 Porchester Road, Takaanini. It seems that the houses that were present on these sites have been identified by the Requiring Authority as PPFs but not the consented apartment blocks. The question of what reliance can be placed on the completeness of identification in the Operational Noise Assessment of existing PPFs is a matter that the Requiring Authority needs to address in evidence at the hearing.

Mr Runcie has noted that the unnumbered condition 'Traffic Noise' refers to Protected Premises and Facilities (PPFs) as meaning only the premises and facilities identified in green, orange or red in *Schedule 4: PPFs Noise Criteria Categories*, whereas Schedule 4 identifies PPFs in a single shade of pink. Mr Runcie has recommended that this Condition be amended to refer to that single colour.

I note that the colours referred to in the Condition (green, orange and red) are used to identify and distinguish between PPFs in Category A, B and C respectively in Appendix B of the Operational Noise Assessment.

It would appear that the result of only a single colour used to identify all PPFs regardless of the PPF Category will enable a change in Category to occur that differs to the identification provided in the Operational Noise Assessment. However, I note that the tables in Schedule 4 of the Proposed Conditions identify the Noise Criteria Category of each PPF (A, B, C) so the intent and effect of the use of a single colour in the maps of Schedule 4 is unclear.

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<sup>198</sup> Ibid, para 4.13-4.14, p8-9

This is a matter that the Requiring Authority should clarify in evidence in the hearing. If the use of a single colour in the maps in Schedule 4 will not enable a change in PPF Category, then I agree with Mr Runcie that the correction to the unnumbered Condition that he has recommended should be made.

As noted above, the Construction Noise Assessment assumes that buildings inside the boundaries of the NoRs are to be removed and therefore effects on noise sensitive activities in those buildings have not been assessed.<sup>199</sup> However, this raises the question of whether operational noise effects on any PPFs that remain following construction (i.e. houses assumed to be removed but which are retained, due to changes at the detailed design stage) will be mitigated. This is a matter that the Requiring Authority should clarify in evidence at the hearing.

I agree with Mr Runcie that an assessment of the BPO for the environment that is present prior to construction commencing is necessary to ensure the adverse effects of traffic noise are mitigated and that the Proposed Conditions should be revised. While I support the intent of the additional clause recommended by Mr Runcie to the operational traffic noise unnumbered condition, I note that in the context of the possible incompleteness of the list of existing PPFs in Schedule 4, I have concerns about the specific exclusion of PPFs constructed following the lodgement of the NoRs. It appears to me that there may be land uses that have resource consent or building consent granted that are not listed in Schedule 4 as PPFs, and as worded the clause recommended by Mr Runcie would mean they would be excluded for being considered for acoustic treatment.

I also note that the reference to 'dwellings that are constructed following the lodgement of the NoR' could instead be somewhat clearer by providing the date on which the South FTN NoRs were lodged (13 October 2023). However, I note that it remains to be seen whether the list of existing PPFs in Schedule 4 is complete.

In relation to the submission by Kāinga Ora Homes and Communities, which seeks that building modification be required for all properties likely to receive internal road traffic noise levels greater than 40 dB LAeq(24h) Mr Runcie has noted that most PPFs predicted to be exposed to noise levels greater than 55 dB LAeq(24h) under the Do Minimum scenario already experience similar levels of noise and so he asks that the submitter clarify what level of change they would consider sufficient to warrant such mitigation. Mr Runcie does not recommend the amendment of the Proposed Conditions sought in the submission, and I agree with his analysis and request that the submitter provide information on the points made in their submission.

#### **4.5.4.4 Planning Recommendations**

I agree with Mr Runcie that Proposed Condition 21 Construction Vibration Standards and Proposed Condition 29 Low Noise Road Surface be amended as he has recommended and this amendment is included in the set of recommended amendments to proposed conditions (**Attachment 5**).

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<sup>199</sup> Ibid, p11. See also 'Table 4-1 Buildings inside designation areas (not assessed)', p11-12.

I agree with Mr Runcie that the amendment to Proposed Condition 22 CNVMP by the Ministry of Education is not needed.

As a preliminary recommendation, before hearing from the Requiring Authority in response to the matters I raise, I have included the additional clause as recommended by Mr Runcie with the addition of the date of lodgement of the South FTN NoRs (13 October 2023), in the set of recommended amendments to proposed conditions (**Attachment 5**). I do so noting my concerns that Schedule 4 may be incomplete, and not include consented dwellings not yet built. If that is the case, then my recommendation of the amendment to be made will likely change to refer to dwellings that are 'consented' after 13 October 2023.

I consider it appropriate that the Requiring Authority provides a response at the hearing on the following noise and vibration matters:

- Whether Proposed Conditions 9 SCEMP, 22 CNVMP and 23 Schedule to a CNVMP will appropriately address the concerns related to noise and vibration effects raised in the submission by Accessible Properties Ltd regarding 59-59C Alfriston Road;
- the likelihood of night time demolition and construction work on the four bridges to be replaced in the South FTN NoRs, how that likelihood might change should recommended new conditions (refer recommendations in section 4.4.4 above) regarding traffic movements and hours be confirmed and whether, as a consequence, there would be potential adverse noise and vibration effects that need new or amended conditions in order to be appropriately avoided, remedied or mitigated;
- the means of disseminating the noise contours in Schedule 4 of the Proposed Conditions as a means of ensuring that new noise sensitive development is aware of future operational traffic noise levels and addresses the need for mitigation of those noise effects;
- whether there are gaps in the identification of the existing receiving environment in the list and maps of PPFs (including resource consents that have been granted and that are likely to be implemented) and whether any additions to that list and maps are needed;
- whether there are gaps in identification of the receiving environment as can be predicted from the applicable policy framework for the areas in which the South FTN NoRs are situated, in relation to operational noise effects and identification of mitigation of operational noise effects;
- the reasons for, and impact of, a single colour used to identify PPFs in the maps included in Schedule 4 of the Proposed Conditions, rather than the three colours used to identify the Noise Criteria Category A, B, C used in the Operational Noise Assessment;

- whether operational noise effects on any PPFs that remain following construction (i.e. houses assumed to be removed but which are retained, due to changes at the detailed design stage) will be mitigated;
- the relief sought in the submissions and Mr Runcie’s assessment of the submissions; and
- the preliminary recommended amendments to the construction and operational noise conditions as included in the set of recommended amendments to conditions in **Attachment 5**.

## 4.6 Urban design effects

### 4.6.1 Requiring Authority assessment

Section 9.3 of the AEE identifies that urban design input has informed the Project’s design, the alternatives assessment process and the footprint for the South FTN NoRs. An Urban Design Evaluation (UDE) is included in the technical documents supporting the NoRs, and that has been based on the principles set out in Te Tupu Ngātahi Urban Design Framework (appended to the UDE).<sup>200</sup>

#### 4.6.1.1 Positive effects

Positive urban design effects identified by the Requiring Authority are discussed in section 4.3.1 above.

#### 4.6.1.2 Urban design effects

The UDE provides an overview of the urban design considerations and inputs as well as an evaluation and identification of future transport and land use integration opportunities for the Project.<sup>201</sup> The matters address in the UDE are stated as being:

- (a) Identification of the current and future context of the South FTN relevant to the urban form;*
- (b) An evaluation of the Project against the Design Framework principles;*
- (c) Recommendation of urban design outcomes that will inform the designation conditions and identification of opportunities that should be considered as part of future design stages;*
- (d) An overall summary of the urban design outcomes associated with the Project and whether the Project outcomes are supportive of the Design Framework principles; and*
- (e) Urban design outcomes and opportunities maps (attached as Appendix A).<sup>202</sup>*

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<sup>200</sup> AEE, p49

<sup>201</sup> Te Tupu Ngātahi Supporting Growth South Frequent Transit Network Urban Design Evaluation (UDE), October 2023, p1

<sup>202</sup> Ibid



The UDE evaluates the urban design matters common to the South FTN project as an overall network<sup>203</sup> and specific evaluations for seven sections of the project corridor defined by the urban context.<sup>204</sup>

The UDE addresses the corridors as integrated and connected elements and then looks at these in the broader urban context, evaluating against the Urban Design Framework Principles. The Urban Design Framework Principles were established to guide all the projects being led by SGA.

The Design Framework Principles are summarised in Figure 3 of the UDE and relate to Environment, Social, Built form, Movement and Landuse. The full details of these are attached as Appendix B to the UDE and include adopted principles, outcomes, and measures for Environment, Social, Built Form, Movement and Land Use.

Section 4 of the UDE evaluates the common urban design matters relevant across the full extent of the South FTN, this is set out in a table with the relevant Design Framework Principle, an explanation of that principle and, where applicable, its application to the proposed NoRs.<sup>205</sup> Sections 5 to 11 provide an urban design evaluation for the Project and makes recommendations for future design stages of the Project.

The UDE recommends preparation of an Urban and Landscape Design Management Plan (ULDMP) to address and further develop the specific urban design outcomes recommended within the UDE.<sup>206</sup> Proposed Condition 12 ULDMP applies to all four of the South FTN NoRs.

#### **4.6.2 Submissions**

A number of submissions raise matters that, while not solely an urban design issue, do relate to matters pertinent to urban design considerations and Proposed Condition 12 ULDMP.

As noted in section 4.6.3 below, the submissions assessed by Council's urban design specialist also raise matters in relation to social impacts and property effects e.g., extent of the designation boundary, extended lapse periods, and the related effects of construction and uncertainty over development opportunities, and compensation, acquisition, or reinstatement. These matters have been addressed in section 4.8 Social Impacts and section 4.16 Property effects.

Other matters raised in submissions such as traffic, noise and vibration have been addressed in the relevant effects section of this report.

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<sup>203</sup> Ibid, p6

<sup>204</sup> Ibid, p6-7

<sup>205</sup> Ibid, p14-22

<sup>206</sup> Ibid, pvii

Submissions to the South FTN NoRs that are assessed by Council's urban design specialist are as follows:

### NoR 1

Submissions by Manurewa Business Association Incorporated (NoR 1 – 32, NoR 3 - 16) and Southmall Manurewa (NoR 1 – 33, NoR 3-17) support the intent of the Great South Road FTN to provide improved transport mode connections and services but consider there needs to be better integration with Manurewa Town Centre and Southmall Manurewa for connectivity, accessibility, safety and attractiveness of the area.

Restaurant Brands Limited (NoR 1 – 22) is the leaseholder of a property at 86-88 Great South Road which is occupied by a KFC drive-through restaurant and has rights to park on the neighbouring property at 84 Great South Road. The submitter is concerned that the extent of the NoR will affect their ability to comply with the landscape standard H9.6.7 of the AUP(OP). The submitter is seeking a modification to the extent of the requirement so that it does not include its site.

Z Energy Limited (NoR 1 – 30) has submitted on NoRs 1 and 3. The submission on NoR 1 relates to Z Energy's Takaanini service station and the Burger King drive-through at 166 Great South Road. Z Energy supports condition 12(d) which sets out the requirement for key stakeholders, identified through condition 9, to be invited to participate in the development of the ULDMP.

### NoR 2

Broshmik Investments Limited (NoR 2- 1) and the Dunford Family Trust (NoR 2 – 2) own land at 260 Great South Road (2/260 and 1/260 respectively). These properties and the businesses operating from them are affected by the extent of the designation, in particular by the batter slope and upgraded stormwater culvert that extends into 260 Great South Road and reduces its main entrance. The submitters seek better integration with their properties and preferably retaining walls rather than batter slope.

Blue Snow Limited (NoR 2- 3) owns land at 263, 267, 271 and 275 Great South Road. The submitter has expressed concern that the designation boundary will restrict access to the business that operates there and ultimately result in its closure. The submitter has sketched some alternative solutions that would lessen the impact to their property.

Carter Holt Harvey Property Limited (NoR 2- 8) owns land at 280 Great South Road. The site is currently vacant. It is zoned Business – Mixed Use. NoR 2 affects the site in its entirety, which will restrict any ability to develop the site.

### NoR 3

As mentioned in relation to NoR 1, submissions by Manurewa Business Association Incorporated (NoR 3 - 16) and Southmall Manurewa (NoR 3 - 17) support the intent of the South FTN NoRs to provide improved transport mode connections and services but consider there needs to be better integration with Manurewa Town Centre and Southmall Manurewa for connectivity, accessibility, safety and attractiveness of the

area. In the opinion of these submitters, blocking and bypassing the southern access to Southmall is contradictory to the town centre integration intended by the FTN. The submitters are also concerned with the apparent ambiguity regarding the proposed changes to the Weymouth Road bridge.

A and M Self (NoR 3 – 32) have submitted in relation to potential landscape and visual effects on their properties at Alfriston Road as a consequence of neighbouring properties being required as part of the designation process. They would like to be consulted as part of the design process.

McDonald's Restaurants NZ Limited (NoR 3 – 15) has submitted in relation to 207 Great South Road, which is at the southern corner of Southmall, at the junction with Weymouth Road. The submitter is concerned that NoR 3 applies to the majority of that site and would adversely impact on the ability for the restaurant to continue to operate on site. The submitter is concerned that it is unclear why so much of the site is included within the designation boundary and that the ongoing operation of the existing restaurant should have been considered in the identification of the extent of the corridor.

The National Trading Company of New Zealand Limited (NoR 3 – 26) has submitted in relation to 185 Great South Road, which comprises New World Southmall. The submitter is concerned at the extent of land take proposed and seeks to ensure the minimum amount of land required for both the operation of the corridor and construction is designated.

Restaurant Brands Limited (NoR 3 – 27) is the leaseholder of a property at 2 Weymouth Road which is currently occupied by a KFC drive-through restaurant. NoR 3 as proposed indicates loss of existing vehicular access to the site and include proposed construction of a batter over part of the drive-through facility. It will also result in the loss of the signage. Restaurant Brands is opposed to the NoR for the site, given the extent of adverse effect on their ability to continue to operate in this location.

Z Energy Limited (NoR 3 – 38) has submitted on NoRs 1 and 3. The submission on NoR 3 relates to Z Energy's Manurewa service station, located on the corner of Alfriston Road and Great South Road, Manurewa.

#### NoR 4

BJ Wallace Trust and SJ Wallace Trust (NoR 4 – 14) own 296 Porchester Road. Among the concerns expressed by the submitter is the restriction on their ability to implement approved resource consents on the landholding. The submitter seeks that the FTN achieve compliance with the landscape and precinct plans for the Takaanini Precinct in the AUP(OP).

Zabeel Investments Ltd (NoR 4 – 15) owns 354 Porchester Road. It currently accommodates a Placemakers building materials store, a Mobil service station and a logistics warehouse. The proposed designation encroaches on the Placemakers car park and Mobil forecourt, including an area where landscaping was required by the Takaanini Precinct and approved resource consents.

Alda Investments Limited (NoR 4- 16) holds a resource consent to develop the sites at 164-166 Porchester Road, zoned Residential – MHU. D E Nakhle Investment Trust (NoR 4 -17) owns the land to which the consent relates. The NoR proposes to take land along both Walters Road and Porchester Road that will affect the ability to construct the consented development, which comprises two four-level apartments containing 42 units in total.

Dianne and Neville Smith (NoR 4 – 5) have submitted in relation to 52 Popes Road, which is affected by one of the proposed stormwater devices. The submission raises a concern regarding pedestrian safety in relation to an existing drain.

#### All NoR

A number of submitters to each of the South FTN NoRs have raised concerns with the extent of road widening proposed as part of the designation. This is not solely an urban design issue; however, the take of land also affects the built form and public realm outcomes at the edge of the corridor.

Kāinga Ora Homes and Communities has submitted on all four South FTN NoRs. Kāinga Ora supports the intent of the South FTN NoRs to support planned urban growth and enable mode shift to public transport and active modes in South Auckland. However, Kāinga Ora has expressed concern that there is a lack of clarity and certainty around the extent of proposed dedicated bus lanes. They are therefore seeking amendments to the ULDMP condition to ensure integration with existing sections of bus lanes on the proposed FTN corridors.

The Ministry of Education has submitted on all four South FTN NoRs, and broadly supports the aim to plan transport investment in South Auckland. However, it notes in Submission NoR 4 - 22 that Papakura Normal School is directly affected by the proposed designation along its Porchester and Walters Road frontages, which affects the existing education purpose designation of this land. The Ministry considers the 12-month process to nominate a contact within Proposed Condition 3 Land Use Integration Process (LUIP) is unduly long. It is also concerned that Proposed Condition 12 ULDMP does not include any requirement to take into account any feedback or input from stakeholders.

#### **4.6.3 Specialist assessment**

Ms Lisa Mein, Council’s consultant urban design specialist, has reviewed the South FTN NoRs, the AEE, UDE and associated technical reports and submissions in relation to the urban design effects (**Attachment 2**).<sup>207</sup>

Ms Mein supports the approach and methodology undertaken in the UDE.<sup>208</sup> Ms Mein notes that the UDE has appropriately identified the opportunities and outcomes for each of the South FTN NoRs that need to be incorporated as the project develops

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<sup>207</sup> Lisa Mein, Memo: Technical specialist memorandum for notices of requirement for South FTN: Urban Design, 17 February 2024

<sup>208</sup> Ibid, para 14.1, p33

through the design stages and supports the recommendations made in the UDE to inform the ULDMP. Ms Mein is of the opinion that this will ensure the detailed design of the corridor responds appropriately to the principles and project specific urban design outcomes sought in the UDE.<sup>209</sup>

#### **4.6.3.1 Submission assessment**

##### NoR 1

In relation to the submissions concerned with landscape buffers (Restaurant Brands, Z Energy) Ms Mein notes that while not an urban design issue only, the take of land in this situation affects public realm outcomes at the edge of the corridor. Ms Mein notes that Proposed Condition 12 ULDMP has as one of its objectives enabling integration of the project's permanent works into the surrounding landscape and urban context and that it requires landscape details prior to construction. In Ms Mein's opinion, the concerns expressed by the submitters in relation to the landscape buffer can be addressed through the ULDMP condition at the appropriate design stage.

##### NoR 2

In relation to Blue Snow Limited (NoR 2 - 3) regarding 263, 267, 271 and 275 Great South Road, Ms Mein comments that access to property is primarily a traffic issue rather than an urban design issue. Ms Mein notes the Requiring Authority's design philosophy is to retain existing access and movement wherever feasible. Notwithstanding this, Ms Mein considers that retention of safe and functional access to all properties should be a condition. This is a matter addressed in detail by Mr Edwards in his specialist assessment and recommendations (refer section 4.4.3 above).

In relation to submissions by Broshmik Investments Limited (NoR 2- 1) and the Dunford Family Trust (NoR 2 – 2) Ms Mein is of the opinion that this matter is adequately addressed within the ULDMP condition – 12(g)(iii)(a) and (b), which ensure edges will need to be designed in greater detail for the final design and outline plan of works.

In relation to the submissions by Carter Holt Harvey Property Limited (NoR 2- 8) and other submitters regarding property effects of NoR 2, Ms Mein notes further engagement by the Requiring Authority to consider how best to minimise impacts on existing landowners and businesses will be needed, and she notes Proposed Condition 9(b)(i) A and C requires engagement with landowners and occupiers whose access is directly affected, and Proposed Condition 19(a)(vi) requires the CTMP to include methods during construction to maintain access to property, or to provide alternative arrangements for access.

##### NoR 3

Commenting on the submissions by Manurewa Business Association Incorporated (NoR 3 - 16) and Southmall Manurewa (NoR 3 - 17), Ms Mein notes it appears NoR 3,

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<sup>209</sup> Ibid

which extends from the junction of Weymouth Road and Selwyn Road and along Alfriston Road, will have a significant impact on the southern edge and access to Manurewa Town Centre and Southmall as well as reducing its current parking area. Ms Mein is of the opinion that these submitters are key stakeholders and therefore should be identified through the process established by Proposed Condition 9(b)(i)B (SCEMP) and be invited to input into the development of the ULDMP in accordance with Proposed Condition 12(d) ULDMP.<sup>210</sup>

In relation to the submissions by McDonald's Restaurants NZ Limited (NoR 3 – 15), The National Trading Company of New Zealand Limited (NoR 3 – 26), Restaurant Brands Limited (NoR 3 – 27), Z Energy Limited (NoR 3 – 38) Ms Mein is of the opinion that from an urban design perspective, the key issue raised is the impact on the public realm, and particularly edge conditions. In Ms Mein's opinion, the urban design issues raised can be adequately addressed in the detail design stage through Proposed Condition 12 ULDMP conditions 12(d), (f) and (g).<sup>211</sup>

#### NoR 4

Commenting on the submissions by BJ Wallace Trust and SJ Wallace Trust (NoR 4 – 14) Ms Mein notes that the Takaanini Precinct is set out in I438 of the AUP:OP, and the submitter's site is within sub-precinct A. A landscape plan is included within the precinct provisions to ensure and appropriate interface with connections. Ms Mein is of the opinion that NoR 4 is largely consistent with this, but it will need to inform the detailed design of landscape and edge treatment. At this stage, Ms Mein considers this can be managed through Proposed Condition 12 ULDMP as it is currently drafted.

In relation to submissions by Zabeel Investments Ltd (NoR 4 – 15), Alda Investments Limited (NoR 4 - 16) and Nakhle Investment Trust (NoR 4 -17), Ms Mein notes the submitters seek participation throughout the various design phases including the earlier concept design. In response, Ms Mein is of the opinion that amendments should be made to Proposed Condition 12(a) ULDMP to ensure that the ULDMP is prepared at least six months prior to the start of construction for a stage of work, which would be more consistent with Proposed Condition 12(d) and would enable genuine engagement with stakeholders in the preparation of the ULDMP.<sup>212</sup>

#### All South FTN NoRs

Ms Mein provides comment on the submission by the Ministry of Education to all South FTN NoRs. Ms Mein notes that Proposed Condition 3 LUIP sets out a clear process for land use integration. Ms Mein supports this Condition, which she considers will enable landowners to get involved, particularly in relation to edge conditions, crossings and stormwater infrastructure. Ms Mein agrees with the Ministry that the period of time for identifying and including contact details could be shortened.

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<sup>210</sup> Ibid, para 12.5, p26

<sup>211</sup> Ibid, para 12.12, p27

<sup>212</sup> Ibid, para 14.5, p30-31

In relation to the submission by Kāinga Ora to all of the South FTN NoRs, Ms Mein is of the opinion that the amendments sought to the Proposed Condition 12 ULDMP to ensure integration with existing sections of bus lanes on the proposed FTN corridors are not required. However, Ms Mein does consider that the addition of the wording “throughout the network” to Proposed Condition 12(iii)(f) would address the concern raised in the submission. The recommended amendment of Proposed Condition 12 ULDMP is set out in Ms Mein’s recommendations discussed below.<sup>213</sup>

In relation to submissions to each of the South FTN NoRs that raise concerns with the extent of widening proposed as part of the designation. Ms Mein considers this is an edge condition issue and in her opinion this is adequately addressed within the ULDMP condition – 12(g)(iii)(a) and (b), which ensures edge will need to be designed in greater detail for the final design and outline plan of works.

#### **4.6.3.2 Conclusions and recommendations**

In response to issues raised in submissions, including in particular the concerns raised in the Ministry of Education submission, Ms Mein recommends the period of time for identifying and including contact details could be shortened. To achieve this, Ms Mein recommends amendment to Proposed Condition 3 Land Use Integration Process,<sup>214</sup> as follows (additions in bold underlined):

##### Land Use Integration Process

The Requiring Authority shall set up a Land use Integration Process for the period between confirmation of the designation and the Start of Construction. The purpose of this process is to encourage and facilitate the integration of master planning and land use development activity on land directly affected or adjacent to the designation. To achieve this purpose:

- (a) Within ~~twelve (12)~~ **six (6)** months of the date on which this designation is included in the AUP, the Requiring Authority shall include the contact details of a nominated contact on the project website (or equivalent information source) required to be established by Condition (2)(a)(iii).
- (b) ...

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<sup>213</sup> Ibid, para 12.6

<sup>214</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

Ms Mein also recommends amendment to Proposed Condition 12 ULDMP, as follows (additions in bold underlined, deletions struck through):

12. Urban and Landscape Design Management Plan (ULDMP)
- (a) A ULDMP shall be prepared **at least six (6) months** prior to the ~~Start of Construction~~ **start of detailed design** for a Stage of Work.
- ...
- (f) To achieve the objective, the ULDMP(s) shall provide details of how the project:
- (i) Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), **community infrastructure**, natural environment, landscape character, ~~and~~ open space zones **and any adopted master plans for the locality**;
- (ii) ...
- (g) The ULDMP(s) shall include:
- ...
- (iii) Landscape and urban design details – that cover the following:
- ...
- f. integration of passenger transport throughout the network;
- ...
- j. interfaces – how the interface and edge treatment with adjoining properties has been treated**

#### 4.6.4 Planning assessment

I rely on the expert opinion of Ms Mein, in regard to her assessment of the submissions and the recommendations for amendments to the Proposed Conditions. I agree with Ms Mein's recommended amendments to Proposed Condition 3 Land Use Integration and to Proposed Condition 12 ULDMP and consider these amendments will better ensure that the Project is integrated with the adjacent urban landscape context. I am of the opinion that the recommended amendments will support achieving AUP:OP objectives and policies of a higher-quality urban environment and integration of land use and transport supporting a range of transport modes.<sup>215</sup> Therefore, I include those amendments in the set of recommended amendments to proposed conditions (**Attachment 5**).

I consider that it is appropriate that the Requiring Authority provides a response at the hearing including on the following matters:

- the relief sought in the submissions
- Ms Mein's assessment of the submissions
- the recommended amendments to the Proposed Condition 3 Land Use Integration Process and Proposed Condition 12 ULDMP.

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<sup>215</sup> AUP:OP, B2.2.1(1)(a) and B2.2.2(2)(c)



## 4.7 Landscape and visual effects

### 4.7.1 Requiring Authority assessment

Landscape and visual effects are addressed in Section 10.3 of the AEE and the supporting technical report Assessment of Landscape and Visual Effects (LVA).<sup>216</sup>

#### 4.7.1.1 Positive effects

Positive landscape and visual effects identified by the Requiring Authority are discussed in section 4.3.1 above.

#### 4.7.1.2 Construction effects

The LVA identifies the construction activities likely to have landscape and visual effects, including site enabling works; impacts on the physical landscape such as vegetation clearance, operation of construction areas, removal of boundary fences and gardens; and route formation works including earth working, construction activity for stormwater treatment areas, construction of physical structures for the road, bus lanes and walking and cycling lanes, and planting areas.<sup>217</sup> The LVA notes that it is anticipated that the majority of construction works will be undertaken during daylight-hours and should there be a requirement for any night works, construction lighting may be required. In this event, the LVA says, it is anticipated that any lighting would be highly localised (to the areas being worked on at the time) and temporary in duration.<sup>218</sup>

The LVA identifies that the construction phase of the Project will have effects on landscape character and visual amenity.<sup>219</sup> The adverse construction effects on landscape character include effects on public open spaces and reserves that will be affected during the construction phase, identified in the LVA as being<sup>220</sup>:

#### NoR 1

- Anderson Park, Great South Road
- Central Park Reserve and the Central Park Cenotaph, Great South Road
- Chisholm Corner, Great South Road, contiguous with the Papakura Cemetery
- Slippery Creek Reserve, Great South Road

#### NoR 2

- Karaka Reserve, Great South Road

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<sup>216</sup> Te Tupu Ngātahi Supporting Growth South FTN NoR Assessment of Landscape and Visual Effects, October 2023

<sup>217</sup> Ibid, section 4.2, p17-18

<sup>218</sup> Ibid, p18

<sup>219</sup> Ibid, p18

<sup>220</sup> Ibid, p19

### NoR 3

- Tadmore Park, Great South Road
- Gallaher Park, Alfriston Road
- An informal (unnamed) recreation reserve, Alfriston Road east of SH1
- Alfriston Park, Alfriston Road

### NoR 4

- An unnamed reserve on the corner of Porchester and Airfield Road

The LVA notes that although there will be disruption to these open spaces, on balance they will still be accessible and usable as public assets and amenities for the community.<sup>221</sup>

The proposed works for bridges across the Otūwairoa / Slippery Creek and Hingaia Streams within NoRs 1 and 2, are identified in the LVA as affecting the natural character of the area of works and will affect and present a change to these streams and their margins.<sup>222</sup>

The LVA notes that construction effects on landscape character, although a change to the existing character and land use, are a necessary part of the process required in order to provide for the improvement of the transport network across this wider landscape to support anticipated urban growth.<sup>223</sup> The overall assessment made in the LVA of potential adverse effects on landscape character resulting from construction effects is as moderate.<sup>224</sup>

The LVA identifies adverse construction effects on visual amenity as being very low adverse effects. The LVA says that the viewing audience is largely restricted to locations near the subject NoRs.<sup>225</sup>

The LVA says the designation and therefore construction areas will be contained by hoardings which will screen views of lower-level construction activity and machinery. It notes that some taller elements such as cranes used for the construction of bridges will be visible above the hoardings, and in many instances seen from a distance given the extent of the respective designations.<sup>226</sup>

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<sup>221</sup> Ibid

<sup>222</sup> Ibid, p20

<sup>223</sup> Ibid

<sup>224</sup> Ibid

<sup>225</sup> Ibid, p21

<sup>226</sup> Ibid

The methods recommended in the LVA to mitigate adverse effects of the construction phase of the Project on landscape character and visual amenity include the CEMP (Proposed Condition 16), TMP (Proposed Condition 19 CTMP), use of screening and hoardings, location of construction yards and storage areas in visually discrete locations, reinstatement planting, and mitigation of effects of lighting for night time works through the use of directional lighting.<sup>227</sup>

#### **4.7.1.3 Operational Landscape and Visual effects**

The LVA assumes that at the time of operation for the FTN Projects, the existing land uses will remain the same (as per the AUP:OP) and urban intensification will have been enabled through provisions related to the MDRS and PC78.<sup>228</sup> It also assumes that the recommendations and mitigation measures have been implemented to minimise effects on landscape character and visual amenity.<sup>229</sup>

The LVA identifies that any adverse effects on landscape character for the Project overall are assessed to be low. The LVA also assesses any adverse effects on the visual amenity across the Project-wide area to be low.<sup>230</sup>

Measures recommended in the LVA to avoid, remedy or mitigate operational effects of the Project include adopting an outcomes-based approach to landscape mitigation that considers overall improvements to the urban landscape and enhances visual amenity; continuation of partnership with Mana Whenua in the design and implementation of landscape outcome; inclusion of a landscape plan within the ULDMP, TMP, and design being mindful of light spill.<sup>231</sup>

The LVA includes specific measures for bridges and structures, such as that these be designed to visually integrate with the localised context.<sup>232</sup> Other specific measures discussed in the LVA relate to integration with the surrounding context, walking and cycling connectivity, reinstatement of private properties, and planting design details.<sup>233</sup>

The LVA provides assessments at the individual NoR level for each of the four NoR. These assessments are summarised in the technical memo of Council's consultant landscape and visual specialist, Mr Rob Pryor (**Attachment 2**).<sup>234</sup>

#### **4.7.2 Submissions**

There are some ten submissions to the South FTN NoRs that raise issues regarding landscape and visual effects. These relate to the following key issues:

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<sup>227</sup> Ibid, p22-23

<sup>228</sup> Ibid, p23

<sup>229</sup> Ibid

<sup>230</sup> Ibid, p24

<sup>231</sup> Ibid, p25-26

<sup>232</sup> Ibid

<sup>233</sup> Ibid, p27

<sup>234</sup> Rob Pryor, Technical Memorandum for Notices of Requirement, FTN Project, 13 February 2024

- Compliance with landscape standards
- Landscape and visual amenity effects on individual property
- Stakeholder input into ULDMP

#### Compliance with landscape standards

Mr Pryor identifies that issues regarding compliance with landscape standards of the AUP:OP or consented development becoming non-compliant with conditions as a result of the designation are matters that while relating to landscaping are largely property and planning issues. Accordingly the submissions that relate to these issues are address in section 4.16 Property and land use effects below.

#### Landscape and visual amenity effects on individual property

One submission specifically raises concerns about clearance of mature vegetation from their property. The submission to NoR 1 by Hansaben Patel raises concerns that the submitter's property at 66 Great South Road and 1 Grande Vue Road will be subject to adverse landscape and visual amenity effects, including from clearance of mature vegetation.

Other submitters have raised more general issues regarding impacts on their property, and those submissions are addressed in 4.16 Property and land use effects below.

#### Stakeholder input to ULDMP

Several submitters express concern at stakeholder input into the ULDMP (Proposed Condition 12). Zabeel Investments (NoR1-15) note that there is no obligation in the Proposed Condition 12 ULDMP for stakeholder participation to continue through the detailed design or for participation in earlier designs (e.g. enabling works) which ultimately affect decisions and outcomes in the ULDMP. They also consider that the ULDMP should also include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes.

In a similar vein, Alda Investments (NoR4-16) and D E Nakhle Investment Trust (NoR4-17) note that the ULDMP requires stakeholders to be invited to participate in the detailed design 6 months prior to the start of detailed design for 'a stage of work'. There is no obligation for this participation to continue through the detailed design. There is also no requirement for participation in earlier designs (e.g. enabling works), which the submitter considers will ultimately affect decisions and outcomes in the ULDMP.

### **4.7.3 Specialist assessment**

Mr Pryor, Council's consultant landscape and visual specialist, has reviewed the South FTN NoRs, the AEE, LVA and submissions received on landscape and visual effects matters.

Mr Pryor identifies that the key issues in the South FTN NoRs include:

- Landscape character and visual amenity effects on public open spaces / reserves (access restriction and vegetation removal)
- Natural character effects on public open spaces / reserves (Otūwairoa / Slippery Creek Reserve)
- Landscape character and visual amenity effects of tree removal
- Landscape character, visual amenity and natural character effects of bridge construction (Otūwairoa / Slippery bridge in NoR 1 and Hingaia stream bridge in NoR 2)
- Landscape character and visual amenity effects of bridge construction (NIMT and SH1 in NoR 3)
- Effects of removal of dwellings, buildings and structures
- Visual amenity effects on adjoining properties and open spaces<sup>235</sup>

Mr Pryor notes the LVA addresses adverse construction effects on open spaces and defers to Council's consultant parks planning specialist, Mr Daniel Kinnoch, on those matters (**Attachment 2**).

In terms of effects on landscape character, Mr Pryor concurs with the LVA that following construction and implementation of the new roading infrastructure and proposed mitigation measures required through the ULDMP, the adverse effects will be low-moderate overall. Upgrading of the streetscape environment and implementation of street tree plantings will potentially enhance the landscape character of the surrounding environment.<sup>236</sup>

Mr Pryor notes the LVA identifies that the new bridge across Otūwairoa / Slippery Creek will require earthworks down the slopes towards the stream, and the new bridge being some 3m higher than the existing bridge will be considerably larger and have an effect on the character of the area.<sup>237</sup> Mr Pryor is of the opinion that the new bridge will visually integrate into the surrounding urban context.<sup>238</sup>

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<sup>235</sup> Rob Pryor, op. cit., p6

<sup>236</sup> Ibid, p16

<sup>237</sup> Ibid, p10-11

<sup>238</sup> Ibid, p11

The new bridge within NoR 2 at Hingaia Stream will also require earthworks and will have effects on the character of the area, being some 4m higher than the existing bridge.<sup>239</sup> Again, Mr Pryor considers this bridge can be integrated into the landscape setting through design detailing of the bridge structures and retaining walls, and through sensitive landscape treatment of the batter slopes as outlined in the Proposed Condition 12 ULDMP in 12(h)(c).<sup>240</sup>

Mr Pryor is of the opinion that the Project area is not high in natural character values, being a high modified urban environment. However, he considers there will be localised effects on the natural character values of the Otūwairoa Stream / Slippery Creek and Hingaia Stream through the earthworks and retaining walls required for the construction of the bridges across the streams. Mr Pryor concurs with the LVA that these areas are not high in existing natural character and the Project provides the opportunity to enhance the natural character values of the stream margins and associated open space through proposed riparian planting as outlined in Proposed Condition 12 ULDMP, proposed conditions 12 (g)(iii)(c) and 12(h)(c).<sup>241</sup>

Mr Pryor concurs with the LVA that the Project will have a high viewing audience due to its location along an existing road corridor within an established urban environment. Close views will be gained from those travelling along the roads and from residential and commercial properties and open space areas adjacent to the designation. From the wider area there will only be limited visibility due to the screening effect of buildings, structures and vegetation within the line of sight.<sup>242</sup>

Mr Pryor is of the opinion that the Project works are largely contained within a highly modified urban environment influenced by Great South Road, Weymouth Road, Alfriston Road, Porchester Road and Popes Road and surrounding roading network. The works are largely contained within the existing road reserve which reduces the sensitivity of the environment to change as proposed by the Project.<sup>243</sup>

Mr Pryor considers Proposed Condition 12 ULDMP and Proposed Condition 27 TMP to be suitable measures to manage potential adverse effects on trees.<sup>244</sup>

#### **4.7.3.1 Submissions assessment**

##### Landscape and visual amenity effects on individual property

Mr Pryor is of the opinion that Proposed Condition 12 ULDMP will achieve appropriate landscape character and visual amenity effects outcomes to avoid, remedy or mitigate potential adverse landscape character and visual amenity effects of the works.

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<sup>239</sup> Ibid, p12

<sup>240</sup> Ibid, p15

<sup>241</sup> Ibid, p16

<sup>242</sup> Ibid, p15

<sup>243</sup> Ibid, p14

<sup>244</sup> Ibid

### Stakeholder input to ULDMP

Mr Pryor concurs with the concerns expressed by the submitters in regard to ongoing stakeholder participation to continue through to detailed design which they consider ultimately affects decisions and outcomes in the ULDMP and consider that this should be addressed in the conditions. Mr Pryor's recommendations include amendment to Proposed Condition 12 ULDMP to address the timing of the preparation of the ULDMP, as discussed in section 4.7.3.2 below.

#### **4.7.3.2 Conclusions and recommendations**

Mr Pryor is satisfied that the LVA is sufficiently comprehensive.<sup>245</sup>

Mr Pryor generally agrees with the Proposed Conditions as mitigating adverse effects on landscape character, visual amenity and natural character, and is of the opinion that Proposed Condition 12 ULDMP will achieve the appropriate landscape character and visual amenity effects outcomes.<sup>246</sup> However, he considers that the ULDMP needs to be prepared well in advance of the detailed design stage of the Project to meet the objective of enabling integration of the project into the surrounding landscape and urban context.<sup>247</sup>

Mr Pryor considers<sup>248</sup> the timing for preparation of the ULDMP should be at least six months prior to the start of detailed design and recommends the following amendment:

#### 12. Urban Landscape Design Management Plan (ULDMP):

- (a) A ULDMP shall be prepared at least six (6) months prior to the Start of Construction start of detailed design for a Stage of Work.

Mr Pryor notes that he has read the technical memo of Council's urban design expert, Ms Mein and concurs with her recommendation that a new clause should be added to the ULDMP condition regarding interface and edge treatment, as discussed in section 4.6.3.2 above.

Mr Pryor is supportive of the Mana Whenua participation in the development of the ULDMP and considers this to be an important key component.

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<sup>245</sup> Ibid, p21

<sup>246</sup> Ibid, para 8.2, p20

<sup>247</sup> Ibid, para 8.3

<sup>248</sup> Ibid, p17-18

Mr Pryor is also supportive of the Proposed Condition CEMP and Proposed Condition TMP, and considers these conditions together with the amended Proposed Condition 12 and other Proposed Conditions will ensure adverse landscape character and visual amenity effects of the work are avoided, remedied or mitigated.<sup>249</sup>

#### 4.7.4 Planning assessment

I rely on the expert opinion of Mr Pryor that the potential adverse landscape character and visual amenity effects, subject to the Requiring Authority's response to the recommended amendment to Proposed Condition 12 ULDMP, can be avoided, remedied or mitigated.

I note that lighting during night time works for demolition and construction of the four bridges to be replaced in the NoR has not been specifically assessed by the Requiring Authority. I consider this is a matter that the Requiring Authority should address in evidence at the hearing.

I note that Mr Pryor's recommended amendment to Proposed Condition 12 ULDMP to require the ULDMP to be prepared at least six months prior to the start of detailed design for a stage of work is the same as recommended by Ms Mein, and for that reason I confirm my recommendation that this amendment be made to Proposed Condition 12 and include it in the set of recommended amendments to proposed conditions (**Attachment 5**).

I consider that the Requiring Authority should provide comment in the hearing on the following matters:

- The potential effects of lighting during night time works for demolition and construction of the four bridges to be replaced in the South FTN NoRs, taking into account the recommended new conditions regarding closures of the bridges, and whether the Proposed Conditions provide for the adverse effects to be appropriately avoided, remedied or mitigated.
- The relief sought in the submissions and Mr Pryor's assessment of the submissions; and
- Mr Pryor's recommendations.

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<sup>249</sup> Ibid, p18



## 4.8 Social Impacts

### 4.8.1 Requiring Authority assessment

The supporting technical assessments lodged with the South FTN NoRs included a Social Impacts Assessment (SIA).<sup>250</sup> Supplementary social impact material was provided to Council in response to the Council's section 92 request for further information.<sup>251</sup> The Requiring Authority's social impact assessment section 92 response (SIA s.92 response) formed a separate document to the SIA and was notified together with the SIA.

#### 4.8.1.1 Positive effects

Positive social impacts identified by the Requiring Authority are discussed in section 4.3.1 above.

#### 4.8.1.2 Social impacts assessment

The SIA assessed the actual and potential social impacts associated with the planning (route protection phase), construction, operation and maintenance of the South FTN NoRs.

The methodology used for the SIA identified the geographical extent of the social impacts; the stakeholders and communities, both existing and future, likely to be impacted by each NoR; and determined the nature of social impacts, such as way of life, community cohesion, quality of living environment and amenity, health and wellbeing, personal and property rights, and fears and aspirations.

The SIA made recommendations for mitigation and management of social impacts. Proposed Conditions to address social impacts include:

- at the route protection phase - Project Information (Proposed Condition 2);
- at the construction phase - a SCEMP prepared prior to the start of construction of a stage of work (Proposed Condition 9), a CTMP to address effects of temporary traffic management and property access (Proposed Condition 19), and a ULDM (Proposed Condition 12), Construction Environmental Management Plan (CEMP) (Proposed Condition 16) and CNVMP (Proposed Condition 22) to also enable the appropriate management of effects on the environment and local communities during construction;
- at the operational phase include a ULDM (Proposed Condition 12) to include details of how the NoRs will be integrated into the surrounding landscapes and communities, and design elements such as crossing locations near community

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<sup>250</sup> Te Tupu Ngātahi Supporting Growth South Frequent Transit Network Social Impact Assessment, October 2023

<sup>251</sup> Attachment A-Social Impact s92 Response, Te Tupu Ngātahi Supporting Growth, 10 November 2023

services.<sup>252</sup>

#### 4.8.2 Submissions

A large proportion of submitters to the South FTN NoRs raise issues and concerns that relate to social effects:

- NoR 1 – 28 of 31 submitters
- NoR 2 – 12 of 16 submitters
- NoR 3 – 36 of 40 submitters
- NoR 4 – 23 of 25 submitters

The key social effects issues raised in submissions are summarised in **Table 15** below:

**Table 15 Key Social Effects Issues Raised in Submissions to South FTN NoR<sup>253</sup>**

Social effects issues	NoR 1	NoR 2	NoR 3	NoR 4
<b>Way of Life</b> (how people live, work, play, access services and facilities and interact with one another)	3		4	1
<b>Cultural values and Identity</b> (shared beliefs, customs, values and stories, and connections to land, places and buildings)	1			
<b>Community impacts</b> (its composition, cohesion, character, how it functions and sense of place)	5		9	2
<b>Quality of the living environment</b> (access to and use of ecosystem services; public safety and security; access to and use of the natural and built environment, and its aesthetics value and/or amenity; the quality of the air and water people use; the level of hazard or risk, dust and noise they are exposed to; their physical safety; and their access to and control over resources)	7	1	12	7
<b>Decision-making systems</b> (particularly the extent to which people	11	6	8	9

<sup>252</sup> AEE, p102

<sup>253</sup> Source: Dr Gillian Stewart, Technical memorandum for Notices of Requirement for South FTN: Social effects, 4 March 2024, table, p10-11

<b>Social effects issues</b>	<b>NoR 1</b>	<b>NoR 2</b>	<b>NoR 3</b>	<b>NoR 4</b>
can have a say in decisions that affect their lives)				
<b>Health and wellbeing</b> (state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity. It includes psycho-social impacts such as solastalgia (a form of mental or existential distress caused by environmental change)	8	2	19	10
<b>Personal and property rights</b> (control of property and assets, including whether people experience personal disadvantage or have their civil liberties affected)	13	4	23	11
<b>Fears and aspirations</b> (perceptions about their safety, their fears about the future of their community, and their aspirations for their future and the future of their children)	7	1	13	13
<b>Socio-economic impacts</b> (including standard of living, level of affluence, economic prosperity and resilience, employment, business disruption, replacement costs of environmental functions and economic dependency).	13	5	20	8
<b># of submission points made</b>	68	19	108	60

The majority of submitters tended to be landowners / property owners (business and residential, as well as public agencies and utility operators), many of whom expressed issues for themselves personally, as well as their tenants and neighbours.<sup>254</sup>

Several submissions came from business owners who were leasing property that is fully or partially affected by the proposed designation and whose business operations would be impacted to varying degrees.<sup>255</sup>

<sup>254</sup> Ibid, para 5.2, p9-10

<sup>255</sup> Ibid

There were also a number of submissions from those representing broader community and/ or neighbourhood interests, such as Manurewa Business Association, Heritage New Zealand Pouhere Taonga, collectives of residents/ home owners, Auckland Council Parks and Recreation, Kāinga Ora and Ministry of Education, who addressed wider community social impacts issues.<sup>256</sup>

The majority of social effects submission points relate to the designation and construction phases of the project, as a result of the impact of the proposed designation boundary on full or partial acquisition of property and proximity to construction activities. The majority of submissions that raise social effects issues are in opposition to the Project. A number (6 public and / or network utility agencies and 4 private submitters) are either neutral, or are in support of the transport outcomes of the Project but seek amendments or additional conditions.<sup>257</sup>

#### 4.8.3 Specialist assessment

Dr Gillian Stewart, Council's consultant social impact specialist, has reviewed the South FTN NoRs, SIA and submissions regarding social impacts (**Attachment 2**).

Notwithstanding some concerns with the SIA, which are discussed below, in general Dr Stewart agrees with the scope of matters addressed by the SIA and considers the SIA's assessment of the positive social impacts of the project are comprehensive and relevant.<sup>258</sup> In general, Dr Stewart also agrees with the scope and type of adverse social impacts that have been identified and assessed by the SIA.<sup>259</sup>

However, Dr Stewart has some concerns with the SIA. She comments:

*On the whole, I find the SGA SIA, its methodology, assessment of effects and recommended mitigations to be minimally sufficient. It has done the job of broadly scoping and assessing the potential type and likelihood of social effects of the project's planning, designation, construction and operation phases to draw some approximate assumptions and conclusions.*<sup>260</sup>

Dr Stewart is of the opinion that the SIA faced a significant methodological challenge in its apparent initiation late in the process of preparing the NoR, apparently in July 2023, giving it only three months to prepare a SIA on a project that directly affects some 551 property owners and some 747 property titles.<sup>261</sup> Dr Stewart says the SIA has depended to a large degree on desktop research and information gathered by preceding project consultation processes that were not designed with social effects assessment or methodology in mind.<sup>262</sup>

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<sup>256</sup> Ibid

<sup>257</sup> Ibid, para 5.4, p10

<sup>258</sup> Ibid, para 4.5, p6

<sup>259</sup> Ibid, para 4.6

<sup>260</sup> Ibid, para 4.1, p5

<sup>261</sup> Ibid, para 4.2, p5

<sup>262</sup> Ibid

Dr Stewart notes the SIA has undertaken engagement with key stakeholders, and affected parties have been identified, but some gaps in regards to community facilities, businesses, organisations and community interests, and local stakeholders are evident. Dr Stewart considers some of the gaps were addressed in the Requiring Authority's response to the Council's section 92 further information request, but she is not sure a comprehensive list of affected people, groups, businesses, employees, owners and tenants, and stakeholders now and into the future has been generated.<sup>263</sup>

Dr Stewart acknowledges that the SIA is limited in its ability to accurately assess social effects that will occur in the future, as those effects and the people and organisations affected will change in the years between the designation and construction and operation. However, it is therefore important, Dr Stewart says, that the SIA is reviewed over time and an effective means is used to identify newly affected interests and parties, to understand their situations and the adverse impacts on them.<sup>264</sup>

Dr Stewart notes that one of Council's section 92 further information requests in relation to the SIA, which she considers was not addressed in the response made by the Requiring Authority, sought information about how the SIA would identify, assess and monitor the management of social effects over the Project phases.<sup>265</sup>

Dr Stewart is of the opinion that there are gaps and inadequacies in the Proposed Conditions to address the following matters:

- The impacts of the loss of community facilities / access among community groups and providers and the corresponding community access to these services
- The management of vacant properties which have the potential to become sites of antisocial behaviour
- Disturbance to neighbours and quality of living environment during demolition and removal of property and buildings
- The loss of local shops and businesses and support for those that may not be able to relocate within the local community
- Changes in community / town centre character, access and vitality
- The loss of jobs due to business acquisition
- Local homeowners who are impacted are supported to relocate
- Loss of social housing and private rental housing<sup>266</sup>

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<sup>263</sup> Ibid, para 4.3

<sup>264</sup> Ibid, para 4.4, p6

<sup>265</sup> Ibid, para 4.11, p7-8

<sup>266</sup> Ibid, para 4.9, p7

#### **4.8.3.1 Submission assessment**

Dr Stewart has assessed the submissions to the South FTN NoRs that raise issues and concerns regarding social effects of the South FTN NoRs.<sup>267</sup>

Dr Stewart discusses the issues raised in submissions under a number of headings:

- Social effects of the proposed 15 year lapse period (for NoR 1, 3 and 4) and 10 year lapse period for NoR 2
- Social effects of full or partial residential property acquisition
- Social effects of full or partial business property acquisition
- Existing consented plans for development of business and residential housing developments impacted by scope, lapse period and uncertainty of the designation
- Aspirations or business requirements for development / improvement of business sites, assets and residential housing impacted by scope, lapse period and uncertainty of the designation
- Social effects of construction and operation for business
- Social effects of construction and operation for residents
- Concerns with inadequate consultation and engagement, request for full and adequate consultation and engagement<sup>268</sup>

Dr Stewart considers that the issues raised by submitters highlight that there are some social impacts (and recommendations in the SIA) that do not have a Proposed Condition to address the issues. These include the following:

- (a) the management of vacant properties which have the potential to become sites of antisocial behaviour or can be leased to ensure occupancy;
- (b) the loss of shops and businesses that may not be able to relocate within the local community;
- (c) the impacts of the loss of community facilities/ access among community groups and providers and the corresponding community access to these services;
- (d) the change in community character due to the loss of shops; and
- (e) the loss of jobs due to business acquisition.

Dr Stewart's recommendations address those matters, having considered the issues and concerns raised by submitters.<sup>269</sup>

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<sup>267</sup> Ibid, para 5.6 – 5.18, p11-20

<sup>268</sup> Ibid

<sup>269</sup> Ibid, para 6.3, p21

#### **4.8.3.2 Conclusions and recommendations**

Dr Stewart is of the opinion that if the designation is confirmed, the Project will have adverse social impacts that cannot be avoided. It will also have the potential to generate positive social impacts, not just in the future delivery of a multi-modal transport network but also in the way it engages and works with the community and affected landowners, businesses, residents, and stakeholders to mitigate and manage its adverse effects.<sup>270</sup>

Dr Stewart recommends a number of new conditions and amendments to Proposed Conditions including:

- 1) a new condition for a Development Response Management Plan (DRMP) to address engagement with affected owners and occupiers, the wider public and other stakeholders to manage the impacts of construction of the Project. Dr Stewart refers to the use of DRMP conditions in other projects, such as City Rail Link, Airport to Botany recommendations of Hearing Panel, and Eastern Busway project.<sup>271</sup> A DRMP would address issues including supporting engagement with stakeholders and the wider public; health and wellbeing effects; impacts of the loss of community facilities and access to community facilities; loss of local shops and businesses and loss of jobs; changes in community / town centre character, access and vitality; local homeowners who need to relocate; and loss of social housing and private rental housing.<sup>272</sup>
- 2) Amendments to Proposed Condition 2 Project Information to broaden the purpose of that information source for the community and to ensure clarity of information.<sup>273</sup>
- 3) a new condition for a Property Management Strategy to address the social effects of vacant properties, which have the potential to become sites of antisocial behaviour, and to manage the potential adverse effects of the demolition and removal of buildings. Dr Stewart refers to how such a condition has been used in other notices of requirement and projects.<sup>274</sup>
- 4) Amendments to Proposed Condition 9 SCEMP to broaden the objectives of the SCEMP to include building and maintaining relationships with diverse stakeholders, to provide opportunities for those new to the area to find out about the project, and to coordinate with the DRMP.<sup>275</sup>

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<sup>270</sup> Ibid, para 6.6, p22

<sup>271</sup> Ibid, para 6.8. The Requiring Authority's Decision on the Airport to Botany NoRs was publicly notified on 8 March 2024.

<sup>272</sup> Ibid, p22-26

<sup>273</sup> Ibid, p22

<sup>274</sup> Ibid, p24

<sup>275</sup> Ibid

- 5) amendments to Proposed Condition 16 CEMP to include the need for a Good Neighbour Policy to be prepared. The intent of the Good Neighbour Policy is to addresses aspects of potential effects during construction that the Proposed Condition 16 CEMP does not address, such as the behaviour of the construction workforce and acting with consideration to those who live and work in the area.<sup>276</sup>

The new condition recommended by Dr Stewart for a Development Response Management Plan is as follows:<sup>277</sup>

#### Development Response Management Plan

- (a) A DRMP shall be prepared prior to the Start of Construction for a Stage of Work.
- (b) The objective of the DRMP is to provide a framework and suite of strategies and measures in consultation with local business and community stakeholders that assist those directly affected by the Project (including directly affected and adjacent owners e.g. businesses, community organisations, households, and their tenants) to manage the impacts of construction, and to maximise the opportunities the Project presents.
- (c) Business Associations and community groups representing businesses and residents within the relevant Stage of Work shall be invited no later than 18 months prior to the Start of Construction for a Stage of Work, to participate in the development of the DRMP.
- (d) To achieve the objective, the DRMP shall include:
  - (i) A list of those likely to be impacted affected by the Project
  - (ii) Recommended measures to mitigate impacts on those identified as affected by the Project associated with construction effects such as the potential loss of visibility of businesses from public spaces, reduction in accessibility and severance loss of amenity, mental and physical health effects and relocation. Such mitigation measures may include business support, business relocation, temporary placemaking and place activation measures and temporary wayfinding and signage, and mental health support and advice.
  - (iii) Identification of opportunities to coordinate the forward work programme, where appropriate with infrastructure providers, development agencies, Council and Local Board planning;
  - (iv) Recommended measures to mitigate effects on the operation and financial wellbeing of community organisations and sports clubs;
  - (v) Recommended hardship assistance package and hardship fund to be available for compensation to landowners, tenants, and adjacent property owners and details of how people will qualify for assistance.
  - (vi) Recommended measures to provide support for anxiety and mental health outcomes;

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<sup>276</sup> Ibid, para 6.7

<sup>277</sup> Ibid, p27-28



- (vii) Recommended assistance for residential and business tenants, leaseholders or owners who are asked to move during the works.
- (viii) Measures to achieve positive social outcomes, which may include supply chain opportunities, education, training and employment opportunities including partnerships with local business associations and community organisations, and by working with local organisations repurposing and recycling of demolition materials.
- (ix) Identification of any other development response measures designed to support those businesses, residents and community services/facilities during construction.
- (x) A record of the activities and assistance provided as a result of the measures listed in (ii)-(vi).
- (xi) Linkages and cross-references to communication and engagement methods set out in other conditions and management plans (e.g. the SCEMP, PMS) where relevant.

As a consequence of adding another management plan, Dr Stewart notes the need to add the DRMP to Proposed Condition 7 Outline Plan of Works as follows<sup>278</sup>:

#### 7. Outline Plan

...

- (c) Outline Plans shall include any management plan or plans that are relevant to the management of effects of those activities or Stage of Work, which may include:
  - (i) Construction Environmental Management Plan;
  - (ii) Construction Traffic Management Plan;
  - (iii) Construction Noise and Vibration Management Plan;
  - (iv) Urban and Landscape Design Management Plan;
  - (v) Historic Heritage Management Plan;
  - (vi) Ecological Management Plan;
  - (vii) Tree Management Plan;
  - (viii) Network Utilities Management Plan; ~~and~~
  - (ix) Open Space Management Plan; ~~and~~
  - (x) **Development Response Management Plan.**

The amendments Dr Stewart recommends to Proposed Condition 2 Project Information are as follows:

#### 2. Project Information

- (a) A project website, or equivalent virtual information source, shall be established within 12 months of the date on which this designation is included in the AUP.

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<sup>278</sup> Ibid, p28-29

- (b) All directly affected **and adjacent** owners and occupiers shall be notified in writing once the website or equivalent information source has been established. **The Requiring Authority will publicise the decision outcomes and location of the website throughout the community using relevant media sources and languages, at least on an annual basis throughout the project until completion.**
- (c) The project website or virtual information source shall include these conditions and shall provide information on:
  - (i) the status of the Project, **including ongoing engagement and activities in relation to implementation of the management plans;**
  - (ii) anticipated construction timeframes;
  - (iii) contact details for enquiries;
  - (iv) the implications of the designation for landowners, occupiers, and business owners and operators within the designation, and where they can receive additional ~~advice~~ **support;**
  - (v) a subscription service to enable receipt of project updates by email; and
  - (vi) when and how to apply for consent for works in the designation under s176(1)(b) of the RMA.
- (d) ~~(b)~~At the start of detailed design for a Stage of Work, the project website or virtual information source shall be updated to provide information on the likely date for Start of Construction, and any staging of works.
- (e) **The project website or virtual information source shall be updated to provide a copy of all SCEMPs and Management Plans outlined in Condition 7 as they are developed for a Stage of Works.**

The new condition for a Property Management Strategy recommended by Dr Stewart is as follows:

Property Management Strategy

- (a) The Requiring Authority shall prepare and submit to Council for Certification a Property Management Strategy (PMS) within 12 months of the date on which this designation is included in the AUP.
- (b) The purpose of the PMS is to set out how the Requiring Authority will acquire the land and properties, whether fully or partially, required by the designation; and to provide a framework for the interim management of the Project portfolio, to ensure they do not deteriorate and adversely affect adjoining properties and the surrounding area. The Strategy shall identify measures and methods to ensure the properties are managed in a manner that:
  - (i) Does not significantly change the character, intensity and scale of the effects of the existing use of the land;
  - (ii) Maintains the condition of the property at that which existed at the time of purchase by the Requiring Authority;
  - (iii) Contributes to the functioning of the area within which the property is located;
  - (iv) Maintains occupancy as far as reasonably practicable; and

- (v) Provides confidence to occupants, adjoining property owners, and the community that the properties are managed responsibly pending construction.
- (c) Within 40 working days of receiving written notice of Certification of the PMS by Council, the Requiring Authority shall notify in writing all directly affected owners and occupiers that the PMS is available on the Project Information website or equivalent that is required under Condition 2.
- (d) The PMS should correspond and support the DRMP's purpose.

The amendment Dr Stewart recommends to Proposed Condition 16 CEMP is the inclusion of a good neighbour policy, as follows:

16. Construction Environmental Management Plan (CEMP)
- (a) A CEMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CEMP is to set out the management procedures and construction methods to be undertaken to, avoid, remedy or mitigate any adverse effects associated with Construction Works as far as practicable. To achieve the objective, the CEMP shall include:
    - (i) the roles and responsibilities of staff and contractors;
    - (ii) details of the site or project manager and the Project Liaison Person, including their contact details (phone and email address);
    - (iii) the Construction Works programmes and the staging approach, and the proposed hours of work;
    - (iv) **development of the Good Neighbour Policy including a schedule for educating construction workers on expectations associated with ensuring that the surrounding community (landowners, occupiers, businesses, and social organisations) feel safe and respected;**

The amendments that Dr Stewart recommends to Proposed Condition 9 SCEMP are as follows:

9. Stakeholder Communication and Engagement Management Plan (SCEMP)
- (a) A SCEMP shall be prepared in consultation with stakeholders, community groups and organisations.
  - (b) The objectives of the SCEMP ~~is~~ **are** to:
    - (i) identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will **be proactively** engaged with prior to and throughout the Construction Works; **and**
    - (ii) **develop, maintain and build relationships with the wider public and diverse stakeholders (including directly affected and adjacent landowners e.g. Business, community organisations, householders and their tenants); and**
    - (iii) **provide opportunities for those new to the area to find out about and engage with the project;**
  - (c) To achieve the objective, of the SCEMP:
    - (i) At least 18 months prior to any Outline Plan being submitted for Construction of a Stage of Work, the Requiring Authority shall identify:
      - A. The properties whose owners **and occupiers** will be engaged with;

- B. A list of key stakeholders, community groups, organisations and businesses who will be engaged with **including but not limited to Papakura Local Board, Manurewa Local Board, Franklin Local Board, Takanini Business Association, Manurewa Business Association, Ministry of Education, Kāinga Ora, KiwiRail, Fire and Emergency New Zealand, Auckland Council Parks, and Network Utility Providers;**
  - C. Methods and timing to engage with landowners and occupiers whose access is directly affected.
  - D. **Methods to engage and consult with the public, key stakeholders, community groups, organisations and businesses in a manner that strengthens the relationship of the Requiring Authority with those persons.**
- (ii) The SCEMP shall include:
- A. Details of ~~(b) (i) A to C~~ **(c) (i) A to D;**
  - B. the contact details for the Project Communications Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);
  - C. the procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;
  - D. methods for engaging with the Mana Whenua, to be developed in consultation with Mana Whenua Kaitiaki Forum;
  - E. methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in ~~(b)(i)A and C~~ **(c) (i) A to D** above; and
  - F. linkages and cross-references to communication and engagement methods set out in other conditions and management plans where relevant.
  - G. **A record of the consultation undertaken with the community and Mana Whenua, including specific access requirements for businesses and residents, including summaries of feedback, the Requiring Authority's response to that feedback; and**
  - H. **any outcomes or actions undertaken in response to feedback, as well as public complaints that are not covered by Condition 17 (Complaints Register).**
- (d)** ~~(e)~~ Any SCEMP prepared for a Stage of Work shall be submitted to Council for information **certification** ten working days prior to the Start of Construction for a Stage of Work **and be reviewed at least annually.**

#### 4.8.4 Planning assessment

I rely on Dr Stewart's expert opinion in making my planning assessment and recommendations in relation to the social effects of the South FTN NoRs.

Dr Stewart has identified that the diverse social effects from the South FTN NoRs will need additional measures to those included in the Proposed Conditions, in order for the actual and potential adverse social effects to be avoided, remedied or mitigated.

#### **4.8.4.1 Development Response Management Plan**

Dr Stewart has recommended a Development Response Management Plan that will have the objective of providing a framework and a suite of strategies and measures that will assist those directly affected by the Project to manage the impacts of construction and to maximise the opportunities the Project presents for achieving positive social outcomes. I agree with Dr Stewart that such a Plan is necessary and note that development response management plans are commonly used to address the social effects of construction of roading projects.

The DRMP condition recommended by Dr Stewart is similar to the condition recommended by the Hearings Panel to the requiring authority, Auckland Transport, for the Airport to Botany Bus Rapid Transit Botany to Rongomai Park notice of requirement (Airport to Botany NoR) (refer example 2 in **Attachment 6**).

In that respect, I note that the Airport to Botany NoR as lodged (refer example 1 in **Attachment 6**) included a DRMP condition in the set of Proposed Conditions, which had as the objective of the DRMP to provide a framework to assist businesses affected by the Project to manage the impacts of construction and maximise the opportunities the project presents. To achieve the objective the DRMP was to, amongst other things, list businesses likely to be impacted, list business associations and key business stakeholder groups to be engaged with through the development of the DRMP, include recommendations for measures to be undertaken to manage the impacts of construction works on the identified businesses, and provide a summary of proactive assistance provided to impacted businesses.

The Hearings Panel Recommendation for the Airport to Botany NoR recommended that amendments to the proposed DRMP condition be made, including adding recommended measures to: mitigate effects on the operation and financial wellbeing of community organisations and sports clubs; provide support for anxiety and mental health outcomes; provide hardship assistance package and hardship fund to be available to compensate landowners, tenants, adjacent property owners together with details of how people will qualify for any assistance; assist tenants, leaseholders or owners who are asked to move during the works.<sup>279</sup>

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<sup>279</sup>Hearing Panel Recommendation, Airport to Botany Bus Rapid Transit Botany to Rongomai Park, 13 December 2023, accessed on 1 March 2023 at [https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/sga\\_airport\\_to\\_botany\\_attachment\\_a\\_to\\_e\\_nor3.pdf](https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/sga_airport_to_botany_attachment_a_to_e_nor3.pdf). Refer example 1 shown in Attachment 6 to this report

The Decision of the Requiring Authority on the Airport to Botany NoR was to reject the Hearing Panel's recommended amendments to the DRMP condition (**Attachment 6**). The reasons given included that the DRMP is focused only on business disruption effects from the project and broadening the scope of the DRMP is not justified. The Decision noted that the matters that the recommended amendments to the DRMP attempt to address will be addressed through the PWA.<sup>280</sup> The Decision confirmed the Airport to Botany DRMP condition as lodged.

Also of note are other confirmed Auckland Transport designations and lodged notices of requirement that include development response measures. Auckland Transport, as the requiring authority, confirmed on 20 October 2023, a condition for the Eastern Busway (Package EB2) designation that a communication and consultation plan must include a Development Response Addendum that addresses social effects during construction such as measures to mitigate potential severance and loss of business visibility issues by wayfinding and supporting signage for pedestrian detours (refer **Attachment 6**). It must also address how a loss of amenity will be mitigated through other management plans, and identify any other development response measures designed to support those businesses, residents and community services/facilities during construction. Community feedback on the management of construction and responses to that feedback form a part of the Development Response Addendum. The communication and consultation plan must be reviewed and updated with the outcome of the monitoring annually.<sup>281</sup>

The recent Eastern Busway 4 Link Road notice of requirement by Auckland Transport, lodged in September 2023, proposes the same Development Response Addendum condition as for the EB2.<sup>282</sup>

It would be helpful for the Requiring Authority to provide an outline of its general approach to development response measures to address the social impacts of projects, and whether, how and why they may vary in different projects.

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<sup>280</sup> Auckland Transport, Notice of Decision under s172 RMA, NoR 1-Airport to Botany Bus Rapid Transit from Botany to Rongomai Park, 21 February 2024, p5

<sup>281</sup> Auckland Transport, Eastern Busway 2, Notice of Decision, 20 October 2023, Accessed at <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=155>

<sup>282</sup> Auckland Transport, Appendix 5 EB3C Conditions, Notice of Requirement-Eastern Busway 4 Link Road (Auckland Transport), accessed 3 March 2023 at <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanID=227>

I note that some of the reasons for rejecting the Hearing Panel recommendations for amendments to the DRPM condition in the Airport to Botany NoR (e.g. support for anxiety and mental health outcomes, which Dr Stewart has recommended be included in a DRMP condition for the South FTN NoRs), were that they were matters that the PWA process would address. It would therefore also be helpful for the Requiring Authority to explain how the PWA processes would address matters such as the social impacts of construction on anxiety and mental health outcomes.

Returning to the DRMP condition recommended by Dr Stewart, I agree in principle with having a DRMP condition that addresses the social and economic impacts on businesses and community organisations. I consider such a condition to be for a resource management purpose and relevant to the subject matter of the proposed works that the South FTN NoRs will enable.

The DRMP condition recommended by Dr Stewart includes as part of the objective of the DRMP the same phrase that is used in the confirmed Airport to Botany DRMP condition: 'maximising the opportunities the Project presents'. However, the confirmed Airport to Botany DRMP condition does not include any measures or details that the DRMP must include in order to achieve that objective.

Dr Stewart has included in her recommended DRMP condition clauses relating to measures to achieve positive social outcomes, in order to achieve the objective of 'maximising the opportunities the Project presents'. I agree that DRMP should include identification of the measures that will be taken to achieve that objective.

I consider there are some parts of the confirmed Airport to Botany DRMP condition that if applied to the South FTN NoRs would duplicate or overlap with the actions to be taken under other of the Proposed Conditions of the South FTN. This includes Proposed Condition 2 Project Information (project liaison person, construction timeframes, construction start date), Proposed Condition 9 SCEMP (project liaison person, prominent display at main entrance to construction site) and Proposed Condition 17 Complaints Register. For that reason I do not recommend a DRMP condition that includes such matters.

I note that the confirmed Airport to Botany DRMP condition excludes businesses included in the DRMP from taking part in the SCEMP. However, I do not consider the exclusion of businesses from the SCEMP would ensure effective opportunity for input by businesses that will be affected by the Stage of Work into the detailed design (refer discussion regarding the SCEMP below). I am of the opinion that the SCEMP and DRMP have different objectives, and will take place at different times in a Stage of Works, and exclusion of businesses is not reasonable.

I am of the opinion that it is reasonable and for a resource management purpose to have conditions that require certification of a management plan that has not been provided at lodgement with a notice of requirement where that plan is also not to be submitted to Council as part of an outline plan. Council has duties to enforce conditions on designations, as it does for conditions on resource consents. Accordingly, in my opinion, it is appropriate that Council has the opportunity to consider whether a plan has been prepared in accordance with the relevant condition and that the requirements of the condition have been met.

With reference to Mr Edwards' advice (refer section 4.4.3) that the transport effects during construction of this Project would be similar to the impacts associated with similar road reconstruction works that are routinely undertaken across Auckland. As such, it is unclear whether a hardship assistance package and hardship fund would be a proportionate resource management response to the social effects that will arise from the South FTN works. My preliminary recommendation for a DRMP condition does not include a provision to require the DRMP to include a hardship assistance package and hardship fund. I note that this recommendation is preliminary, without having yet heard from submitters and the Requiring Authority on this matter.

My preliminary recommendation is to include a modified version of the confirmed Airport to Botany DRMP condition, taking on board some of Dr Stewart's recommendations, in the set of recommended amendments to proposed conditions (**Attachment 5**) as follows:

Development Response Management Plan (DRMP)

- (a) A DRMP shall be prepared 18 months prior to the Start of Construction for a Stage of Work;
- (b) The objectives of the DRMP are to provide a framework to assist businesses affected by the Project to manage the impacts of construction and to maximise the opportunities the Project presents;
- (c) To achieve the objectives, the DRMP shall include:
  - (i) a list of businesses and community organisations likely to be impacted by the Project;
  - (ii) a list of business associations, key business stakeholder groups and community organisations that have and will be engaged through the development of the DRMP;
  - (iii) details of the methodology to establish the baseline of businesses and community organisations identified in (c)(i) above;
  - (iv) details of measures that will be undertaken to manage the impacts of Construction Works on the identified businesses and community organisations;
  - (v) methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (c)(i) above;
  - (vi) a summary of any proactive assistance provided to impacted businesses;



- (vii) Measures to achieve positive social outcomes, which may include supply chain opportunities, education, training and employment opportunities including partnerships with local business associations and community organisations, and by working with local organisations repurposing and recycling of demolition materials;
- (viii) linkages and cross-references to communication and engagement methods set out in other conditions and management plans (e.g. the SCEMP) where relevant; and
- (d) Any DRMP prepared for a Stage of Work shall be submitted to Council for certification that the requirements of this condition have been met at least 20 working days prior to the Start of Construction for a Stage of Work.

#### **4.8.4.2 Project Information**

Dr Stewart has recommended additions to Proposed Condition 2 Project Information. The first addition relates to the Requiring Authority publicising its Decision on the South FTN NoRs. Given the time that will have elapsed from the release of the decision until the establishment of the website or equivalent virtual information source (within 12 months of the inclusion of the designation in the AUP:OP), and the duty of Council under section 173 of the RMA to notify the Decision to all persons who made a submission and land owners and occupiers directly affected by the Decision, I do not consider this to be an effective condition. I note that Proposed Condition 2 already requires a copy of the Conditions and the status of the Project to be included on the website.

Dr Stewart's recommendations include that the location of the website be publicised throughout the community during relevant media sources and languages at least on an annual basis throughout the Project until completion. I agree with the intent of this additional clause, and I consider the term 'multiple' may be clearer and more certain than the word 'relevant'.

Dr Stewart's recommendations are that the information on the website should include ongoing engagement activities in relation to the implementation of management plans. I consider this is a duplication of what Proposed Condition 9 SCEMP achieves, and also of the additional clause also recommended by Dr Stewart that the website be updated to provide a copy of all SCEMPs and Management Plans as they are developed for a Stage of Work. I agree that the SCEMP and Management Plans should be available on the website as they are developed and note that Proposed Condition 8(a)(vi) already requires that Management Plans be uploaded to the project website or equivalent virtual information source once finalised. I am of the opinion that there should be reference to the uploading of the SCEMP and management plans within Condition 2 Project Information.

Given these considerations, I therefore recommend a slightly modified version of Dr Stewart's recommendation as amendments to Proposed Condition 2 as follows (additions in bold underlined, deletions shown as struck through):

#### Project Information

- (a) A project website, or equivalent virtual information source, shall be established within 12 months of the date on which this designation is included in the AUP. All directly affected **and adjacent** owners and occupiers shall be notified in writing once the website or equivalent information source has been established.
- (b) The requiring authority shall publicise the location of the website or equivalent virtual information source throughout the community using a variety of media sources and languages, at least on an annual basis throughout the project until completion.**
- (c)** The project website or virtual information source shall include these conditions and shall provide information on:
  - (i) the status of the Project;
  - (ii) anticipated construction timeframes;
  - (iii) contact details for enquiries;
  - (iv) the implications of the designation for landowners, occupiers, and business owners and operators within the designation, and where they can receive additional ~~advice~~ **support**;
  - (v) a subscription service to enable receipt of project updates by email; and
  - (vi) when and how to apply for consent for works in the designation under s176(1)(b) of the RMA.
- (d)** ~~(b)~~ At the start of detailed design for a Stage of Work, the project website or virtual information source shall be updated to provide information on the likely date for Start of Construction, and any staging of works.
- (e) The website or virtual information source shall be updated to provide a copy of all SCEMPs, and in accordance with Condition 8 all Management Plans, as they are finalised for a Stage of Works.**

#### 4.8.4.3 **Property Management Strategy**

A new 'property management strategy' condition has been recommended by Dr Stewart. I note that the Requiring Authority's social impact expert, in the lodged SIA recommends:

*AT to take responsibility to maintain upkeep and security of acquired properties. It is recommended that where possible AT temporarily lease or rent out acquired properties to ensure occupancy or provide for another temporary purpose for the community to use such as a community garden or pocket park<sup>283</sup>*

There is no condition that implements that recommendation in the Proposed Conditions for the South FTN NoRs. In discussion of the adverse effects resulting from property acquisition, such as loss of community connections, the AEE states that property acquisition is managed through the PWA.<sup>284</sup> No further explanation is given for omitting the above-cited recommendation in the Requiring Authority's SIA regarding management of property acquired for the Project.

The new Property Management Strategy condition recommended by Dr Stewart includes that one of the purposes of that Strategy would be setting out how the Requiring Authority will acquire the land and properties, whether fully or partially required by the designation. The condition recommended by Dr Stewart requires that the Property Management Strategy be certified by Council, which would therefore entail Council certifying the acquisition process of the Requiring Authority.

I understand the intent of the recommendation for a Property Management Strategy is to assist directly affected landowners and occupiers to better understand when and how their property will be purchased. However, I do not agree that the way to provide information about the land acquisition process is for this to be documented in a strategy as a requirement of a condition applying to the designation. I consider that such an acquisition strategy will likely be largely shaped by the PWA requirements and is not within the scope of resource management matters that conditions on the NoRs should address.

I note that section 4.5 of the AEE sets out engagement and consultation during the South FTN NoRs preparation, and that this included community events, letters to directly affected landowners and provision of an information pack that includes the Auckland Transport Landowner Guide.<sup>285</sup> I have read the Auckland Transport Landowner Guide and consider it provides clear general information about the property acquisition process. Therefore, I am of the opinion that the Requiring Authority has already provided information about the property acquisition process to those directly affected and I do not support the need for this part of Dr Stewart's recommended Property Management Strategy condition.

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<sup>283</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network, Social Impact Assessment, October 2023, p45

<sup>284</sup> AEE, op.cit, p101-102

<sup>285</sup> AEE, op.cit., p 31. Refers to Auckland Transport, Landowner Guide, April 2021, accessed 5 March 2023 at <https://supportinggrowth.govt.nz/assets/supporting-growth/docs/20210525-Final-Landowner-Guide-1.pdf>

However, I am of the opinion that there is merit in a Property Management Strategy to address how property acquired for the Project will be managed during the period of time between purchase and construction of the Project.

I note that the wording of the Property Management Strategy is similar to that included in the AUP:OP for the City Rail Link designation, including the parts that relate to property being managed in a way that does not significantly change the character, intensity and scale of the effects of the existing use of the land, maintains the condition of the property and contributes to the functioning of the area. I agree that maintenance of the properties acquired is important and understand that the issue with change in character is related to the potential change in community character due to, for example, the loss of shops.

The Property Management Strategy condition as recommended by Dr Stewart includes that the Requiring Authority shall notify in writing all directly affected owners and occupiers that the PMS is available on the website or other virtual information source, which Proposed Condition 2 requires to be established. I agree that the Property Management Strategy will be of wider community interest, and for that reason should be put onto the project information website. However, I do not agree that the costs involved in notifying directly affected landowners and occupiers is reasonable, given the effects to be managed by this condition are the potential adverse social effects on the wider community of poor maintenance of property, and not just on the owners and occupants of land within the South FTN designation. I am of the opinion that making the Property Management Strategy available on the project website is sufficient.

I note that Dr Stewart considers the Property Management Strategy, which is to be submitted to Council within 12 months of inclusion of the South FTN NoRs in the AUP, must correspond and support the DRMP's purpose. By this I understand Dr Stewart to mean the it must support the DRMP's objective, which in the new condition recommended by Dr Stewart is to *provide a framework and suite of strategies and measures in consultation with local business and community stakeholders that assist those directly affected by the Project ...to manage the impacts of construction, and to maximise the opportunities the Project presents*. I am of the opinion that including the need to correspond and support the DRMP in the Property Management Strategy appears to be duplicating the outcomes sought by the DRMP condition, and for that reason I consider it to be unnecessary.

Taking the matters I have discussed above into account, I recommend amendment of the Proposed Conditions to include a new condition for a modified version of the Property Management Strategy that Dr Stewart has suggested, as follows:

Property Management Strategy (PMS)

- (a) The Requiring Authority shall prepare and submit to Council for Certification a Property Management Strategy (PMS) within 12 months of the date on which this designation is included in the AUP;
- (b) The purpose of the PMS is to provide a framework for the interim management of the properties acquired for the South FTN, to ensure they do not deteriorate and adversely affect adjoining properties and the surrounding area. The Strategy shall identify measures and methods to ensure the properties are managed in a manner that:
  - (i) Does not significantly change the character, intensity and scale of the effects of the existing use of the land;
  - (ii) Maintains the condition of the property at that which existed at the time of purchase by the Requiring Authority;
  - (iii) Contributes to the functioning of the area within which the property is located;
  - (iv) Maintains occupancy as far as reasonably practicable; and
  - (v) Provides confidence to occupants, adjoining property owners, and the community that the properties are managed responsibly pending construction;
- (c) Within 40 working days of receiving written notice of Certification of the PMS by Council, the Requiring Authority shall make the PMS available on the Project Information website or equivalent that is required under Condition 2.

A consequential change to the Abbreviations and definitions section of the Proposed Conditions is also required, to define 'certification' in relation to the Property Management Strategy.

I consider using similar terms as are already included in the Proposed Conditions, in relation to certification of material changes to management plans, is appropriate, as follows:

Acronym/Term	Definition
Certification of Property Management Strategy	Confirmation from the Manager that a Property Management Schedule has been prepared in accordance with the condition to which it relates. A Property Management Strategy shall be deemed certified: (a) where the Requiring Authority has received written confirmation from Council that the Property Management Strategy is certified; or (b) ten working days from the submission of the Property Management Strategy where no written confirmation of certification has been received.

The above-noted recommendations are included in the set of recommended amendments to proposed conditions in **Attachment 5**.

I consider the Requiring Authority should provide evidence at the hearing to outline how properties that have been purchased ahead of construction of roading projects are to be maintained and to respond both to the condition recommended by Dr Stewart and to the condition I have recommended.

#### **4.8.4.4 Construction Environmental Management Plan**

Dr Stewart has recommended a 'good neighbour policy' be added to Proposed Condition 15 CEMP.<sup>286</sup> I agree that this additional provision will assist in avoiding potential adverse social effects during construction. I consider that some minor wording changes are needed so that the condition is clear in the context of the clause it relates to. The recommendation that I include in the set of recommended amendments to proposed conditions in **Attachment 5**, is as follows:

Proposed Condition 15 CEMP

- (a) A CEMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CEMP is to set out the management procedures and construction methods to be undertaken to, avoid, remedy or mitigate any adverse effects associated with Construction Works as far as practicable. To achieve the objective, the CEMP shall include:

...

- (xi) a Good Neighbour Policy including procedures and guidelines for construction workers on expectations associated with ensuring that the surrounding community (landowners, occupiers, businesses, and social organisations) feel safe and respected;**

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<sup>286</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

#### **4.8.4.5 Stakeholder Communication and Engagement Management Plan**

Dr Stewart has recommended additions to Proposed Condition 9 SCEMP relating to objectives, key stakeholders, relationship building, record of consultation and engagement, certification and annual review. I comment on each of those matters in turn below.

##### Objectives

I note that the objective of a SCEMP as stated in Proposed Condition 9 is to identify how engagement will be carried out prior to and throughout the Construction Works for a stage of works. That is a low-level objective for a SCEMP, which would, in my opinion, generally be aimed at achieving a more purposeful outcome other than just identifying 'how to consult'.

While not explicit in Proposed Condition 9 SCEMP, it would appear that the purpose of the consultation and engagement is to provide information about the construction works and ensure that the Requiring Authority's contact person for public enquiries or complaints is known of. For example, Proposed Condition 9 SCEMP does not refer to seeking feedback from those consulted on the detailed design for a stage of work, or management plans, or proposed methods of construction. Nor does it refer to seeking to gain an understanding of the concerns and needs of those consulted and responding appropriately.

Dr Stewart has recommended that an objective of a SCEMP should be, in brief, to develop, maintain and build relationships with the wider public and diverse stakeholders. I am of the opinion that the NoRs effectively impose a long-term relationship on those directly affected and also the wider community, and it is therefore appropriate that one of the objectives of a SCEMP recognises this. For that reason I recommend a slightly modified version of the objective recommended by Dr Stewart, which recognises that it is members of the community (rather than the wider public) and those organisations that will represent the community (business associations and community organisations) that the Requiring Authority needs to use the SCEMP process to develop and maintain relationships with.

Dr Stewart has recommended that a second objective of a SCEMP should be that it provides opportunities for those new to the area to find out about and engage with the project. To some degree this objective appears to duplicate what Proposed Condition 2 Project Information seeks to do. Also, each SCEMP will be prepared at a certain time for a stage in the Project, so the SCEMP may not be effective in informing those new to the area about the Project. For that reason I do not include this objective in my recommended amendments to the Proposed Conditions.

## Stakeholders

Dr Stewart recommends that the SCEMP condition specify that the list of stakeholders, community groups, organisations and businesses that the Requiring Authority will engage with must include: Papakura Local Board, Manurewa Local Board, Franklin Local Board, Takanini Business Association, Manurewa Business Association, Ministry of Education, Kāinga Ora, KiwiRail, Fire and Emergency New Zealand, Auckland Council Parks, and Network Utility Providers.

I note that some of those organisations will likely have an interest in only certain stages or parts of the South FTN, and that the names of stakeholder organisations may have changed in 10 – 15 years time, or may have evolved into different structures.

I also note that specifying that the Requiring Authority engage with certain named organisations implies an obligation on those third-parties to participate in that engagement. Many, but not all, of the listed parties are submitters to the South FTN NoRs and they may be able to confirm in the Hearing that they have no concerns with being listed in the Conditions as parties to be engaged with. As a preliminary opinion, before having heard evidence of submitters and the Requiring Authority, I do not consider naming stakeholder organisations in the condition to be particularly effective and do not include this in my recommended amendments to Proposed Conditions.

## Content of SCEMP

Dr Stewart recommends that the SCEMP must identify methods to engage and consult in a manner that strengthens the relationship of the Requiring Authority with the public, key stakeholders, community groups, organisations and businesses. I consider that the focus of this clause is intended to be that the SCEMP must identify the methods of and timing of engagement. Therefore I recommend a more concise version of this addition to Proposed Condition 9 SCEMP. I also consider that the landowners and occupiers to be engaged with should not be limited to those whose access is directly affected.

## Record of Consultation and Outcomes/Actions

Dr Stewart recommends the SCEMP must record the consultation undertaken with the community and Mana Whenua, and identify outcomes or actions in response to feedback and any complaints not covered by Condition 17 Complaints Register.

I generally agree with this recommendation, except for the requirement that the SCEMP record engagement with Mana Whenua. I note that Proposed Condition 10 is that prior to the detailed design of a Stage of Work Mana Whenua are to be invited to prepare a Cultural Advisory Report to inform the management and protection of Ngā Taonga Tuku Iho ('treasures handed down by our ancestors') and Proposed Condition 11 Mana Whenua Kaitiaki forum is a forum for Mana Whenua to participate as partners in all phases of the Project. I am of the opinion that it would be a duplication of the functions of other Conditions, for the engagement and outcomes of the partnership with Mana Whenua to be documented in the SCEMP.



I agree with Dr Stewart that the SCEMP can act as a record of outcomes and actions taken in response to feedback. I note that Proposed Condition 17 Complaints Register relates to 'at all times during Construction Works', and does not relate to the pre-construction phase of the Project. However, I consider 'feedback' encompasses complaints, and do not consider that this needs to be separately referred to in the SCEMP Condition.

#### Certification of SCEMP

The SCEMP to be prepared in accordance with Proposed Condition 9 is not a management plan that is required under Proposed Condition 8 to be submitted with the Outline Plan that Condition 7 in turn requires. Instead, the SCEMP is proposed as being provided to Council for information 10 days prior to the start of construction for a Stage of Work, although a list of those to be consulted and the methods of consultation are required under Proposed Condition 9 to be prepared at least 18 months prior to any Outline Plan being submitted for construction of a Stage of Work. The rationale for the timing of the SCEMP and the provision to Council for information only shortly before construction commences is not apparent.

I note that Proposed Condition 8 Management Plans requires, in clause (c), that *Any material changes to the SCEMPs are to be submitted to the Council for information.*

I consider that the SCEMP or that part of the SCEMP that records who was consulted and what actions were taken in response to feedback during consultation could usefully be provided to Council with the Outline Plan for a Stage of Work to which the SCEMP relates. In order for the engagement to be meaningful it would be important that those consulted have the opportunity to input into or provide feedback on a draft of the detailed design for a Stage of Works.

An alternative, which would also give Council some ability to verify that the requirements of the SCEMP Condition had been met, would be for the SCEMP to be provided to Council for certification.

Dr Stewart has suggested that the SCEMP could be submitted to Council for certification ten working days prior to the Start of Construction of a Stage of Work. However, I consider that this timing would not enable any action to be taken prior to the commencement of construction in order to remedy any failure of the submitted SCEMP to fulfil the requirements of the SCEMP Condition. For example, if a key stakeholder has been omitted from the engagement carried out, then the 10 day timeframe would potentially be insufficient for that omission to be pointed out and for any steps to be taken by the Requiring Authority to remedy that omission.

If certification of the SCEMP were to be included in Proposed Condition 9 SCEMP, as an alternative to it forming a part of an Outline Plan, I am of the opinion that the SCEMP would need to be provided to Council at least 20 working days prior to the Start of Construction for a Stage of Work.

I note that the Auckland Transport Eastern Busway EB2 conditions include that the communication and consultation plan required as a condition of that designation must be certified by Council (**Attachment 6**).<sup>287</sup>

I also note that in the Airport to Botany NoR Decision, Auckland Transport has rejected the Hearing Panel recommendations that the SCEMP be submitted to Council for certification. However, the Airport to Botany Decision did make other modifications to the SCEMP condition, to require that a record be submitted with an Outline Plan for the relevant Stage of Work of the properties within the designation that the Requiring Authority does not own or have occupation rights to, a list of key stakeholders, community groups, organisations and businesses who will be engaged with, and the methods of engagement.

While the purpose, location and effects of the EB2 and the Airport to Botany designations are different to the South FTN, they are all projects involving potential adverse social effects for the community during the construction phase. It is not apparent why a different approach to provision of a SCEMP to Council would vary from one project to another, and this is a matter the Requiring Authority might usefully address in the hearing.

At this preliminary stage, I recommend amendment of Proposed Condition 9 to require the SCEMP to be prepared at least 6 months prior to the detailed design for a Stage of Work and for the SCEMP to be provided with the Outline Plan for the Stage of Works to which it relates. Recognising that the SCEMP will likely need updating just prior and during construction of the works, material changes to the SCEMP should be provided to Council for certification.

#### Annual Review

Dr Stewart has recommended that a SCEMP for a Stage of Works be reviewed at least annually. I note that the amendments I recommend, including that the SCEMP be provided with the Outline Plan, would make an annual review difficult to achieve.

I also note that the stated intention is for the works to be staged, and that the stated indicative total duration of construction of the total extent of NoR 1, 2 and 3 are each 2-3 years, and for NoR 4 is 1-2 years.<sup>288</sup> The duration of each Stage of Works, which a SCEMP will be prepared for, is not known as yet. It would be helpful for the Requiring Authority to make comment on this matter at the hearing. At this stage, I have not included the need for an annual review of the SCEMP for a Stage of Works in the set of recommended amendments to proposed conditions in **Attachment 5**.

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<sup>287</sup> Auckland Transport, Eastern Busway, op.cit, Condition 9 Stakeholder Communication and Engagement. Condition 8 Management Plans – Certification and Review requires management plans to be submitted at least 20 working days prior to the commencement of construction, and any amendments to a certified management plan other than minor amendments must be submitted to Council to certify those amendments are consistent with the relevant designation condition(s) of the designation.

<sup>288</sup> AEE, op.cit., Table 9-2, p49

## Recommended amendments to Proposed Condition 9 SCEMP<sup>289</sup>

Taking the matters I have discussed above into account, the amendments to Proposed Condition 9 SCEMP, which I include in the set of recommended amendments to proposed conditions (**Attachment 5**), are as follows (additions in bold underlined, deletions shown as struck through):

### Stakeholder Communication and Engagement Management Plan (SCEMP)

(a) A SCEMP shall be prepared in consultation with stakeholders, community groups and organisations **prior to the start of detailed design of a Stage of Work.**

**(b)** The objectives of the SCEMP is **are** to:

(i) identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works. **; and**

(ii) **Develop and maintain relationships with members of the community and stakeholders, including but not limited to directly affected and adjacent landowners and occupants, business associations and community organisations.**

**(c)** To achieve the objectives, of the SCEMP:

(i) At least **6 months prior to the start of detailed design for** ~~48 months prior to any Outline Plan being submitted for Construction of a Stage of Work,~~ the Requiring Authority shall identify:

A. The properties whose owners **and occupiers** will be engaged with;

B. A list of key stakeholders, community groups, organisations and businesses who will be engaged with;

C. Methods and timing to engage with landowners and occupiers ~~whose access is~~ **who are** directly affected **by the construction of the Stage of Works to which the SCEMP relates; and**

**D. Methods and timing to engage with those key stakeholders, community groups, organisations and businesses listed in accordance with (c)(i)B of this condition.**

(ii) The SCEMP shall include:

A. Details of ~~(b)(i)A to C;~~ **(c)(i) A to D;**

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<sup>289</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

B. the contact details of the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);

...

E. methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in ~~(b)(i)A and C~~ **(c)(i) A to D** above; and

F. linkages and cross-references to communication and engagement methods set out in other conditions and management plans where relevant;

**G. A record of the engagement with the parties identified in (c)(i)A to D above including summaries of feedback and the requiring authority's response to feedback; and**

**H. any outcomes and actions undertaken in response to feedback, including changes to the detailed design.**

~~(d)(e)~~ Any SCEMP prepared for a Stage of Work shall be submitted to Council **as part of an Outline Plan pursuant to s.176 of the RMA for that Stage of Work.** ~~for information ten working days prior to the Start of Construction for a Stage of Work.~~

Consequential changes to Proposed Condition 7 Outline Plan, Proposed Condition 8 Management Plans and Abbreviations and Definitions are needed, as follows (additions shown in bold underlined, deletions shown as struck through):

#### 7. Outline Plan

(c) Outline Plans shall include any management plan or plans that are relevant to the management of effects of those activities or Stage of work, which may include:

(i)...

...

**(xi) Stakeholder Communication and Engagement Plan**

#### 8. Management Plans

(a) Any management plan shall:

(i)...

...

(v) Be submitted as part of an Outline Plan pursuant to s176A of the RMA, with the exception of SCEMPs and CNVMP Schedules.

(c) Any material changes to the SCEMPs are to be submitted to the Council for information **certification.**

## Abbreviations and definitions

...	...
Certification of material changes to management plans, <b>SCEMPs</b> , and CNVMP Schedules	Confirmation from the Manager that a material change to a plan, <b>SCEMP</b> , or CNVMP Schedule has been prepared in accordance with the condition to which it relates. A material change to a management plan, <b>SCEMP</b> , or CNVMP Schedule shall be deemed certified: (a) where the Requiring Authority has received written confirmation from Council that the material change to the management plan <b>or SCEMP</b> is certified; (b) ten working days from the submission of the material change to the management plan <b>or SCEMP</b> where no written confirmation of certification has been received; or (c) five working days from the submission of the material change to a CNVMP Schedule where no written confirmation of certification has been received.

### 4.8.4.6 Conclusions - Social effects

Dr Stewart has identified that the diverse social effects from the South FTN NoRs will need additional measures to those included in the Proposed Conditions, in order for the actual and potential adverse social effects to be avoided, remedied or mitigated.

I have largely agreed with the recommendations of Dr Stewart and have recommended amendments to the Proposed Conditions as a result (**Attachment 5**).

I also consider that the Requiring Authority could usefully address a number of the matters raised in relation to social impacts of the South FTN NoRs, including:

- an outline of the Requiring Authority's general approach to development response measures to address the social impacts of projects, and whether, how and why they may vary in different Auckland Transport projects;
- what measures to address social impacts, such as mental health matters, that the Requiring Authority considers will be addressed under the PWA;
- a response to the recommended new conditions for a DRMP and Property Management Strategy;
- a response to the recommendations for amendments to Proposed Conditions 2 Project Information, 9 SCEMP and 16 CEMP; and
- the relief sought in the submissions and Dr Stewart's assessment of the submissions.

I note that my conclusions and recommendations are preliminary only, without having yet had the benefit of hearing from submitters or the Requiring Authority.

## **4.9 Open Space effects**

### **4.9.1 Requiring Authority assessment**

The AEE provides a high-level assessment of the potential benefits and adverse effects of the designation on the parks and open spaces, in terms of the provision of active mode facilities, connectivity, amenity, and ecological values.

#### **4.9.1.1 Positive effects**

Positive open space effects identified by the Requiring Authority are discussed in section 4.3.1 above.

#### **4.9.1.2 Assessment of Effects**

The AEE states that the South FTN NoRs will enhance the accessibility and connectivity of the parks and open spaces and provide opportunities for improved amenity and ecological values through planting and stormwater management. The AEE also acknowledges that the designation will result in some adverse effects, such as the loss of open space area, the removal of trees and vegetation, the disruption of access and parking, and visual and landscape impacts.<sup>290</sup>

The AEE identifies the main construction activities that will affect parks and open spaces, such as earthworks, vegetation clearance, site establishment, service relocation, and bridge replacement. The AEE also identifies the main construction effects that will affect parks and open spaces, such as noise, vibration, dust, traffic, and visual impacts. The AEE states that the construction effects will be temporary and localised, and will be managed through the proposed conditions and management plans, such as the Construction Environmental Management Plan (CEMP), the Construction Traffic Management Plan (CTMP), the Construction Noise and Vibration Management Plan (CNVMP), and the Open Space Management Plan (OSMP).<sup>291</sup>

The AEE provides a general overview of the operational effects of the designation on the environment, including on parks and open spaces. The AEE identifies the main operational activities that will affect parks and open spaces, such as the operation and maintenance of the FTN, the active mode paths, the stormwater wetlands, and associated infrastructure. The AEE also identifies the main operational effects that will affect parks and open spaces, such as noise, vibration, traffic, and visual impacts. The AEE states that the operational effects will be minor or negligible and will be managed through the proposed conditions and management plans, such as the Urban and Landscape Design Management Plan (ULDMP), the Historic Heritage Management Plan (HHMP), the Tree Management Plan (TMP), and the Network Utilities Management Plan (NUMP).<sup>292</sup>

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<sup>290</sup> Daniel Kinnoch, Section 42A Report on the South FTN Notices of Requirement – Parks Planning, 7 February 2024, para 5.2

<sup>291</sup> Ibid, para 5.3, p5

<sup>292</sup> Ibid, para 5.4, p5

While the AEE identifies most of the affected open spaces and reserves for each of the South FTN NoRs, it does not identify all of them. The open spaces left out of the AEE were acknowledged in the Requiring Authority's section 92 response as being Karaka Reserve and Hingaia Stream Esplanade Reserve in NoR 2, Tadmire Park, Index Place Reserve, and Alfriston Park in NoR 3, and Addison Reserve in NoR 4.<sup>293</sup>

With the exception of Hingaia Stream Esplanade Reserve and Addison Reserve, both which are acknowledged as part of the NoR 3 and NoR 4 receiving environments respectively but are not otherwise assessed, the AEE and section 92 response provide a description of open space condition, function, and value, and a summary of anticipated effects in each location.<sup>294</sup>

#### **4.9.2 Submissions**

A submission by Auckland Council Parks and Community Facilities opposes NoR 1, NoR 2 and NoR 3 and raises issues related to the loss of public open space, park land and assets, the effects on vegetation, streams, and esplanade reserves, and the adequacy of the proposed management plans and conditions to avoid, remedy, or mitigate the operational effects of the designation.

#### **4.9.3 Specialist assessment**

Daniel Kinnoch, Council's consultant parks planning specialist, has reviewed the South FTN NoRs, AEE and other technical assessments and submissions regarding parks and opens space matters (**Attachment 2**).

Mr Kinnoch is of the opinion that the AEE has understated or overlooked some adverse effects on parks and open spaces, such as the loss of connection between the War Memorial and adjacent parkland at the Central Park Cenotaph, and the potential for undesirable modifications to the distinctive mound at Chisholm Corner.<sup>295</sup> These are identified by Mr Kinnoch as matters that the Requiring Authority should address in evidence.

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<sup>293</sup> Ibid, para 5.5, p6

<sup>294</sup> Ibid, para 5.6, p6

<sup>295</sup> Ibid, para 5.7, p6

Mr Kinnoch considers the Requiring Authority has not adequately addressed the cumulative temporary or permanent loss of open space across the South FTN NoRs or the effect these losses could have on overall service provision for open space in the Manurewa and Papakura Local Board areas. Although some of the open spaces affected by the NoRs are relatively small or have low use, Mr Kinnoch considers they still contribute to the network of parks and reserves that provide recreational and open space benefits to the communities. Mr Kinnoch is of the opinion that the loss or reduction of these open spaces, even temporarily, could diminish the quality and quantity of open space available and increase the pressure on the remaining spaces.<sup>296</sup>

Mr Kinnoch provides comments on the potential effects of the South FTN NoRs on each of the affected parks and open spaces. This is a comprehensive assessment and is not duplicated here for the sake of brevity (refer **Attachment 2**).

Mr Kinnoch also provides a summary of the key parks planning issues as set out in Table 16 below:

**Table 16 Summary of Key Parks Planning Issues in South FTN NoR**

Notice of Requirement	Key Parks Planning Issues
South FTN: Great South Road FTN Upgrade (NoR 1)	<ul style="list-style-type: none"> <li>i. Impacts on Anderson Park, Central Park, Central Park Cenotaph, Chisholm Corner, Otūwairoa /Slippery Creek Reserve</li> <li>ii. Potential Effects: Trees, vegetation, open space amenity, access, connectivity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>
South FTN: Great South Road (Drury Section) (NoR 2)	<ul style="list-style-type: none"> <li>i. Impacts on Karaka Reserve, Hingaia Stream Esplanade Reserve</li> <li>ii. Potential Effects: Trees, vegetation, riparian values, access, connectivity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>
South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)	<ul style="list-style-type: none"> <li>i. Impacts on Tadmore Park, Gallaher Park, Index Place Reserve, Alfriston Park</li> <li>ii. Potential Effects: Trees, vegetation, open space amenity, access, parking, connectivity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>
South FTN: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)	<ul style="list-style-type: none"> <li>i. Impacts on Addison Reserve</li> <li>ii. Potential Effects: Vegetation, open space amenity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>

<sup>296</sup> Ibid, para 5.8, p7



#### **4.9.3.1 Submissions assessment**

Mr Kinnoch has assessed the matters raised in submissions to the South FTN NoRs. Mr Kinnoch's technical memo (**Attachment 2**) discusses all of the reserves and open spaces referred to in the submission by Auckland Council Parks and Facilities, and should be referred to for a complete assessment of the issues raised. The following discussion notes the matters that are identified by Mr Kinnoch as needing the Requiring Authority to address in evidence at the hearing or where Mr Kinnoch has significant concerns about potential adverse effects.

##### Loss of public open space, park land and assets – NoR 1

###### *Central Park Cenotaph*

In relation to 278 Great South Road, Papakura (Central Park Cenotaph), Mr Kinnoch notes that the cenotaph is listed as a Category B historic place in the AUP:OP. Mr Kinnoch also identifies that there is also a protected Phoenix Palm within the grassed area of the open space. The site of the open space is zoned Open Space - Informal Recreation Zone.

NoR 1 proposes an active mode path detouring to the south of the Cenotaph, to provide a connection between Great South Road and Ōpaheke Road. Mr Kinnoch notes it is unclear why cut batters are shown in the General Arrangement Drawings for this part of NoR 1, as the site appears to him to be flat. Mr Kinnoch suggests this is a matter the Requiring Authority may like to provide evidence on at the hearing.<sup>297</sup>

Mr Kinnoch defers to Council's heritage expert, Mr Dan Windwood (refer **Attachment 2**) in relation to the heritage values of the Central Park Cenotaph, but considers that the amenity of the open space in this location does in part come from the Cenotaph as a destination.<sup>298</sup>

Mr Kinnoch notes that it is unclear at this stage how the existing path will tie into the active mode path, or why the Cenotaph itself is proposed to be subject to the designation if no works are proposed to it. The active mode path is also likely to introduce modern elements that are incongruous with the historic character and aesthetic of the Cenotaph and park, such as signage, lighting, or pavement materials.<sup>299</sup>

Mr Kinnoch considers it is unclear why the Requiring Authority has not considered the alternative of providing for the active mode path within the existing road corridor up to and along the corner of the intersection between Great South Road and Ōpaheke Road.

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<sup>297</sup> Ibid, para 5.24, p12

<sup>298</sup> Ibid, para 5.25, p14

<sup>299</sup> Ibid

Mr Kinnoch recommends that the Requiring Authority address this in their evidence. Mr Kinnoch also recommends that the Requiring Authority undertake further consultation with relevant stakeholders, such as the Local Board, Royal New Zealand Returned and Services' Association, and the public, to explore alternative options or design solutions that could minimise the potential effects on the Central Park Cenotaph and the open space around it.<sup>300</sup>

### *Chisholm Corner*

Mr Kinnoch identifies that the public open space at Chisholm Corner is recognised as a historic site in the Papakura Open Space Network Plan and is zoned Open Space-Informal Recreation Zone.<sup>301</sup> NoR 1 will result in permanent effects on Chisholm Corner, with the active mode path on the western boundary requiring cut battering on the mound, altering its shape and form. Mr Kinnoch notes that the flagpole situated at Chisholm Corner may be affected, but this is not assessed in the Requiring Authority's AEE.<sup>302</sup>

Mr Kinnoch recommends that the Requiring Authority address in evidence the design of the proposed works at Chisholm Corner and explore options to avoid or minimise the effects on the mound, at least to the extent that its form is not comprised.

Mr Kinnoch considers that the Requiring Authority should demonstrate why the battering works are necessary for the active mode path, and how any permanent effects will be mitigated; and should also address whether any modifications are proposed to the flagpole location at the intersection.<sup>303</sup>

## NoR 2

### *Hingaia Stream Esplanade Reserve*

The Hingaia Stream Esplanade Reserve is located along the western bank of the Hingaia Stream, just to the north of Great South Road. Mr Kinnoch identifies that it is bordered to the west by industrial and commercial properties located within the Business - Light Industry Zone.

Mr Kinnoch notes that the esplanade reserve appears inaccessible, and has little amenity or recreational value, but he considers it would likely serve some ecological and natural hazard protection value by providing a buffer between industrial land uses and the stream.

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<sup>300</sup> Ibid, para 5.26, p15

<sup>301</sup> Ibid, para 5.27, p15

<sup>302</sup> Ibid, para 5.31, p15

<sup>303</sup> Ibid, para 5.32, p17

As noted by Mr Kinnoch, the ecological effects are commented on in the memos of Council's ecology specialists, Mr Simon Chapman and Ms Antoinette Bootsma (Attachment 2), and he does not address those matters.<sup>304</sup>

Mr Kinnoch says the Requiring Authority has not provided any information on why the esplanade reserve is included in NoR 2, and may wish to do so in evidence at the hearing. Mr Kinnoch considers that it may be to provide for construction clearance for the bridge works, rather than any long-term occupation or use. In this regard, Mr Kinnoch is of the opinion that, provided the conditions require the designation boundaries to be reduced or removed from the esplanade reserve where the land is no longer required to be protected for public works, this can be supported.<sup>305</sup>

### NoR 3

#### *Gallaher Park*

Mr Kinnoch identifies that Gallaher Park is a Council owned public open space located on Alfriston Road in Manurewa, which is zoned Open Space - Sport and Active Recreation Zone. Mr Kinnoch notes that it is a large site that offers a range of facilities for active and passive recreation, including a playground, four floodlit playing fields, grandstand, clubrooms, childcare centre, and at-grade car parking. Mr Kinnoch also notes that the car park within Gallaher Park is used by various groups that use the park and its facilities, such as the Alfriston Road Kindergarten, Scout Association, and All Seasons Touch.<sup>306</sup>

Mr Kinnoch notes that the Requiring Authority has assessed that the Project would have both permanent and temporary effects on this reserve.

Mr Kinnoch identifies that the permanent effects are limited to the provision of active mode facilities along Alfriston Road and associated earthworks batters, which would result in some vegetation loss along the northern edge of the park. The temporary effects include the impact on access to the existing car park and the loss of approximately eight car parks during construction. Mr Kinnoch is of the opinion that these effects would be mitigated by the re-establishment of the car parks after the completion of the works, as well as the availability of over 50 other car parks that would remain unaffected by the Project.<sup>307</sup>

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<sup>304</sup> Ibid, para 5.48, p28

<sup>305</sup> Ibid, para 5.52, p30

<sup>306</sup> Ibid, para 5.60, p32 Alfriston Road Kindergarten (lease expiry May 2033), Scout Association (lease expiry September 2033), and All Seasons Touch (lease expiry November 2025)

<sup>307</sup> Ibid, para 5.62, p32

Mr Kinnoch considers that the long-term effects on Gallaher Park can be supported, as the proposed active mode facilities will enhance connectivity to this open space for all members of the community, ensuring optimum utilisation of the park and recreational assets.<sup>308</sup>

However, Mr Kinnoch considers that a matter that needs to be addressed by the Requiring Authority in the hearing is whether the eight car parks that will be lost during construction are proposed to be replaced 1:1.

Mr Kinnoch notes that the Requiring Authority's response to Council's section 92 request for further information (PP1) on this matter, is that the car parks are temporarily lost during construction only and will be reinstated within the park. However, in the Requiring Authority's response to further information requests PP18 and PP19, it is stated that the car parks are "likely" to be reinstated, which, to Mr Kinnoch, implies some uncertainty.

Mr Kinnoch considers that if the car parks are not reinstated, this would reduce the availability of parking for the park users and the effects of this should be addressed by the Requiring Authority in expert evidence at the hearing.<sup>309</sup>

#### *Alfriston Park*

Mr Kinnoch identifies that Alfriston Park is a Council owned public open space in Manurewa that functions as a Neighbourhood Park and is zoned Open Space - Informal Recreation Zone.

Mr Kinnoch notes the park contains large areas of grassed open space, a number of trees, and a playground. Mr Kinnoch identifies that the Requiring Authority proposes a wetland on the southern half of the open space, which is identified in the AEE as disrupting access and resulting in reduced open space utility during construction.<sup>310</sup> However, Mr Kinnoch notes that the proposed wetland is one of six proposed stormwater management devices for the South FTN and it seems it may be a permanent stormwater wetland.

Mr Kinnoch considers this is a matter that the Requiring Authority should clarify at the hearing.<sup>311</sup>

Mr Kinnoch also notes that the existing path that provides connection between Alfriston Road, the playground within the Park, and Saralee Drive, is proposed to be reconfigured and would no longer be a straight direct line.

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<sup>308</sup> Ibid, para 5.65, p34

<sup>309</sup> Ibid, para 5.63, p34

<sup>310</sup> Ibid, para 5.72, p38 refer 10.3.3 AEE, p76

<sup>311</sup> Ibid, p39

Mr Kinnoch asks that the Requiring Authority address these matters in their evidence at the hearing. Mr Kinnoch is of the opinion that the Requiring Authority should also consider how the works in this location are potentially reducing land for the Council to provide for the recreational needs of the community, and address whether this can be offset or compensated in some way.<sup>312</sup>

#### **4.9.3.2 Conclusions and Recommendations**

To address the concerns raised in submissions and the issues that Mr Kinnoch has identified in his assessment of the South FTN NoRs, Mr Kinnoch makes recommendations for amendments to the Proposed Conditions 2 Project Information, 4 Designation Review, 8. Management Plans, 12 Urban and Landscape Design Management Plan, 13 Open Space Management Plan, and Schedule 5 to the Proposed Conditions.<sup>313</sup>

Mr Kinnoch recommends an amendment to Proposed Condition 2 Project Information to include details about responsibilities, maintenance, updates and duration of the website or information source, as follows (additions shown in bold underlined, deletions shown as struck through):

##### 2. Project Information

(a) A project website, or equivalent virtual information source, shall be established **by the requiring authority** within 12 months of the date on which this designation is included in the AUP. All directly affected owners and occupiers shall be notified in writing once the website or equivalent information source has been established. **The requiring authority shall be responsible for the maintenance and updating of the website or virtual information source, ensuring that information remains current and accurate throughout the duration of the project.** The project website or virtual information source shall include these conditions and shall provide information on:

...

**(c) The website or virtual information source shall remain active for a minimum of five years following project completion, or until all major project activities have concluded, whichever is later, to provide ongoing access to project information and updates.**

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<sup>312</sup> Ibid, para 5.76, p41

<sup>313</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

Mr Kinnoch recommends amendments to Proposed Condition 4 Designation Review to include a timeframe for when notice must be given to Council under s.182 of the RMA that areas have been identified by the Requiring Authority as no longer needed. The amendment recommended by Mr Kinnoch to Proposed Condition 4 is as follows (additions shown in bold underlined):

4. Designation Review

*(a) The Requiring Authority shall within 6 months of Completion of Construction or as soon as otherwise practicable:*

- (i) review the extent of the designation to identify any areas of designated land that it no longer requires for the on-going operation, maintenance or mitigation of effects of the Project; and
- (ii) give notice to Auckland Council in accordance with section 182 of the RMA for the removal of those parts of the designation identified above, **within one month of identification.**

Mr Kinnoch is of the opinion that a condition similar to Proposed Condition 6 Network Utility Operators (Section 176 Approval) is needed in relation to Auckland Council's role as the provider of open space services and amenities to the public, and recognising the need for Council to be able to respond to any urgent issues that arise in open spaces within the designated land. This would, in Mr Kinnoch's view, recognise the need for Council to maintain and operate these open spaces in the interim period before the construction works start, and following and before any designation areas no longer needed are uplifted.<sup>314</sup> Mr Kinnoch asks that the Requiring Authority respond to this recommendation in evidence at the hearing, including whether an amendment to Proposed Condition 6 or a new condition may be offered to address this matter.<sup>315</sup>

Mr Kinnoch notes his support for Proposed Condition 7 Outline Plan, which includes reference to a number of plans that are relevant to open spaces, including the ULDMP, TMP and OSMP.

Mr Kinnoch recommends amendment to Proposed Condition 8 Management Plans, to clarify that the management plans must be uploaded to the project website or equivalent virtual information source that is required under Condition 2 Project Information.<sup>316</sup>

The amendment Mr Kinnoch recommends to Proposed Condition 8 Management Plans is as follows (additions shown in bold underlined, deletions shown in struck through):

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<sup>314</sup> Ibid, para 8.15, p59

<sup>315</sup> Ibid, para 8.17

<sup>316</sup> Ibid, para 8.22, p59-60

## Management Plans

(a) Any management plan shall:

...

(vi) Once finalised, **be** uploaded to ~~the~~ **a** Project website or equivalent virtual information source-, **established in accordance with Condition 2.**

Mr Kinnoch is of the opinion that there is some ambiguity regarding the interpretation of “material change” as referenced in Proposed Condition 8 Management Plans (b)(ii), (b)(iii), and (c), as well as ambiguity in the meaning of “sufficient detail” in clause (a)(iii). Mr Kinnoch considers that the criteria for determining materiality and the adequacy of detail are not clear, including who holds the deciding authority. To remove any uncertainty, he recommends that the Requiring Authority outline in evidence their interpretations of these terms to ensure clarity and prevent any ambiguity.<sup>317</sup>

Mr Kinnoch recommends amendment to Proposed Condition 12 ULDMP to include reference to the specific Ngahere plans for Manurewa and Papakura, as well as the applicable Local Board greenway and local path plans. Mr Kinnoch considers these plans are relevant to the Project’s landscape and urban design outcomes and should be considered in the ULDMP, to ensure that the Project aligns with the existing and planned initiatives to enhance the urban forest, biodiversity, connectivity, and amenity values in the Project area.<sup>318</sup>

Mr Kinnoch also considers that part (g)(ii) of Proposed Condition 12 ULDMP should be amended to specifically refer to park and open space design and reinstatement.

The amendments to Proposed Condition 12 ULDMP that Mr Kinnoch recommends are as follows (additions shown in bold underlined):

### 12. Urban and Landscape Design Management Plan (ULDMP)

(a)...

...

(e) The ULDMP shall be prepared in general accordance with:

...

(v) Auckland’s Urban Ngahere (Forest) Strategy or any subsequent updated version.

**(vi) Nga Ara O Manurewa | Manurewa Local Paths Plan (2019) or any subsequent updated version**

**(vii) Manurewa Urban Ngahere Action Plan (2022) or any subsequent updated version**

**(viii) Papakura Greenways Local Paths Plan (2016) or any subsequent updated version**

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<sup>317</sup> Ibid, para 8.24, p60

<sup>318</sup> Ibid, para 8.28, p61

**(ix) Papakura Urban Ngahere Action Plan (2022) or any subsequent updated version**

...

(g) The ULDMP(s) shall include:

...

(iii) Landscape and urban design details – that cover the following:

...

- i. Re-instatement of construction and site compound areas, driveways, accessways and fences.
- j. Re-instatement of and, where practicable, enhancement of parks and open space.**

Mr Kinnoch notes that Proposed Condition 13 Open Space Management Plan (OSMP) is intended to only apply to NoR 1 and NoR 3, and only refer, in Schedule 5 of the Proposed Conditions, to Alfriston Park (NoR 1), Tadmire Park (NoR 3), Gallaher Park (NoR 3), and Alfriston Park (NoR 3).<sup>319</sup> Mr Kinnoch is of the opinion that open space management plans should be required for all the South FTN NoRs and for all open spaces, regardless of location, size and condition. Mr Kinnoch recommends that Schedule 5 list all of the reserves referred to in his assessment.<sup>320</sup> Mr Kinnoch considers that the OSMP will ultimately serve as the primary management plan for managing effects on parks and recreational assets within the Project area and for that reason<sup>321</sup>

Mr Kinnoch is of the opinion that the objective of the OSMP should be broadened, to not only relate to recreational amenity, but open space values generally. Mr Kinnoch considers the objective of the OSMP should also provide for enhancement where practicable.<sup>322</sup> To address maintenance of access and the level of service for open spaces during construction of the Project, Mr Kinnoch recommends further amendments to Proposed Condition 13 OSMP, to clarify that the measures taken should align with the existing level of public accessibility and service of each open space. This ensures the condition sets realistic expectations and acknowledges the varying degrees of accessibility across different open spaces, thus preventing the imposition of undue obligations on the project.

Mr Kinnoch's recommended amendments to Proposed Condition 13 OSMP are as follows (additions shown in bold underlined, deletions shown as struck through):

**NoRs** Open Space Management Plan (OSMP)

**1, 2, 3,** (a) ...

**and 4** ...

~~NoR 1~~ (c) The objective of the OSMP is to minimise as far as practicable adverse

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<sup>319</sup> Ibid, para 8.33-34, p62

<sup>320</sup> Ibid, para 8.36, p62

<sup>321</sup> Ibid, para 8.35-36, p62

<sup>322</sup> Ibid, para 8.37, p62



and effects on the recreation amenity values and functions of the open  
NoR-3 spaces listed in Schedule 5 resulting from the Project, while also seeking  
opportunities for enhancement where practicable. To achieve the  
objective, the OSMP shall include details of:

(i) how the ongoing operation of and access (including walking and cycling)  
to those open spaces during construction will be maintained or  
appropriately managed in accordance with the Construction Traffic  
Management Plan (Condition 19), taking into account the existing  
public accessibility of each space;

...

(iii) measures to reasonably maintain or manage the existing level of  
service and accessibility of the affected open space; and

...

The additions to Schedule 5 of the Proposed Conditions that Mr Kinnoch recommends  
are:

NoR 1

- Central Park
- Central Park Cenotaph
- Chisholm Corner
- Slippery Creek Reserve

NoR 2

- Karaka Reserve
- Hingaia Stream Esplanade Reserve

NoR 3

- Index Reserve

NoR 4

- Addison Reserve

In addition to the above-noted amendments to the Proposed Conditions, Mr Kinnoch  
has recommended that the Requiring Authority provide evidence on a number of  
matters, relating to:

- (i) Temporary and permanent loss of open space across Manurewa and Papakura  
Local Board areas;
- (ii) The design of the proposed works at Central Park Cenotaph and at Chisholm  
Corner, and the options to avoid or minimise the adverse effects on open space  
amenity and heritage features;

- (iii) Whether car parks to be removed at Gallaher Park and Tadmire Park will be replaced on a 1:1 basis, and whether access to the remaining car parks will be maintained during the construction works
- (iv) The location and alignment of the path within Alfriston Park
- (v) How risks associated with the wetland and playground at Alfriston Park will be managed<sup>323</sup>

**4.9.4 Planning assessment**

I rely on the expert opinion of Mr Kinnoch in making my planning assessment and recommendations.

I agree with Mr Kinnoch that there are matters that the Requiring Authority should clarify and address in evidence at the hearing, as set out in Mr Kinnoch’s conclusions and recommendations in section 4.9.3.2 above.

I agree with the amendments to the Proposed Conditions recommended by Mr Kinnoch, for the same reasons as explained in his technical memo. My preliminary recommendation, therefore, without yet having had the benefit of hearing the evidence from the Requiring Authority and of submitters, is that the amendments to the Proposed Conditions as recommended by Mr Kinnoch be made, as set out in section 4.9.3.2 above (with minor punctuation and numbering changes, to align with formatting of the Proposed Conditions) as included in the set of recommended amendments to proposed conditions in **Attachment 5**.

Relying on the expert opinion of Mr Kinnoch I also recommend the following additions to Schedule 5 of the Proposed Conditions<sup>324</sup>, (additions shown in bold underlined, deletions shown as struck through):

NoR 1

Open Space Name	Address	Legal description
...		
<b><u>Central Park Reserve</u></b>	<b><u>57R Wood Street, Papakura</u></b>	<b><u>ALLOT 205 SEC 11 VILLAGE PAPA KURA</u></b>
<b><u>Central Park Cenotaph</u></b>	<b><u>278 Great South Road, Papakura</u></b>	<b><u>ALLOT 115 SEC 11 Village PAPA KURA</u></b>
<b><u>Chisholm</u></b>	<b><u>312 Great South Road,</u></b>	<b><u>Lot 3 DP 148082</u></b>

<sup>323</sup> Ibid, para 9.2, p63

<sup>324</sup> Street addresses and legal descriptions sourced from Attachment 1 to Council’s section 92 Request for Further Information, dated 30 October 2023, p43-48

Open Space Name	Address	Legal description
<b><u>Corner</u></b>	<b><u>Papakura</u></b>	
<b><u>Otūwairoa / Slippery Creek Reserve</u></b>	<b><u>Road Reserve</u></b>	<b><u>Road Reserve</u></b>

NoR 2

No open spaces to be included

<u>Open Space Name</u>	<u>Address</u>	<u>Legal description</u>
<b><u>Karaka Reserve</u></b>	<b><u>10R Karaka Road, Drury</u></b>	<b><u>SEC 1 SO 65144</u></b>
<b><u>Hingaia Stream Esplanade Reserve</u></b>	<b><u>279 Great South Road, Drury</u></b>	<b><u>LOT 4 DP 46314</u> <b><u>LOT 5 DP 46314</u></b></b>

NoR 3

<u>Open Space Name</u>	<u>Address</u>	<u>Legal description</u>
...		
<b><u>Index Reserve</u></b>	<b><u>92R Alfriston Road, Manurewa</u></b>	<b><u>LOT 53 DP 349979</u></b>

NoR 4

No open spaces to be included

Open Space Name	Address	Legal description
<b><u>Addison Reserve</u></b>	<b>21 Airfield Road</b>	<b><u>LOT 1029 DP 516537</u></b>

In conclusion, I consider that it is appropriate that the Requiring Authority provides a response at the hearing on matters that include:

- the relief sought in the submissions and Mr Kinnoch’s assessment of the submissions
- the matters identified by Mr Kinnoch
- the recommendations and conclusions in Mr Kinnoch’s assessment and
- the recommended amendments to the Proposed Conditions.

#### **4.10 Flooding effects**

A summary of the assessment of flooding effects is provided in Section 10.7 of the AEE and a full assessment is provided in the Assessment of Flooding Effects document lodged with the South NoRs (Flood Hazard Report).<sup>325</sup>

##### **4.10.1 Requiring Authority assessment**

Section 9.4 of the AEE outlines the approach to stormwater management taken in the South FTN NoRs. It notes that effects of stormwater quantity, quality, and effects on streams are authorised under Regional Plan provisions and are not authorised by the proposed designations. Accordingly, the AEE says, these effects will be considered as part of a future consenting process. Stormwater assessment in the AEE is limited to flooding effects.

Notwithstanding that future regional consents will address management of stormwater, the AEE explains that the concept design and proposed designation boundaries enables the future management of stormwater effects. The area required for stormwater devices within the South FTN NoRs is based on high-level indicative sizing of the devices and area required for construction. The stormwater design identifies preferred treatment, including stormwater treatment ponds. The Assessment of Alternatives in Appendix A to the AEE sets out the process for how the stormwater management devices have been selected.

##### **4.10.1.1 Positive effects**

Positive effects identified by the Requiring Authority are discussed in section 4.3.1 above.

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<sup>325</sup> Te Tupu Ngātahi Supporting Growth, Assessment of Flooding Effects, October 2023

#### **4.10.1.2 Construction effects**

The AEE identifies that there may be some to flood hazards during the construction phase of the South FTN NoRs, primarily due to the temporary staging platforms required to construct new bridges and temporary diversions to construct new culverts. The details of the construction approach will be confirmed at detailed design stage.

The AEE states that the Flood Hazard Report concludes that there is unlikely to be significant additional risk of flood effects during construction. Proposed works will be located outside of flood plains and overland flow paths as far as practicable. Where this is not possible, potential flooding effects will be managed through the Proposed Conditions, including Proposed Condition 16 CEMP, which includes that the CEMP must include:

*(a) (vii) measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstruction to flood flows, actions to respond to warnings of heavy rain*

The AEE states:

*Some new temporary flooding risks may be posed by the construction of new and existing bridges, culverts and stormwater devices associated with the works required. However, the details of the construction methodology will be confirmed in the future during detailed design and Outline Plan preparation. It is expected that the works can be carried out in a manner that appropriately manages these risks and this can be defined through the flood risk mitigation measures in the CEMP.<sup>326</sup>*

#### **4.10.1.3 Operational effects**

The AEE identifies that flood hazard risks from the operation of the Project may result from changes to:

- The flood freeboard to existing habitable buildings;
- Overland flow paths and flood prone areas;
- Flood levels on developable land (in the FUZ); and
- The ability to access property by residents and emergency vehicles.<sup>327</sup>

Specific upstream properties and terrain features of each of the South FTN NoRs alignment that have potential flood risk are identified.<sup>328</sup>

The measures to avoid, remedy or mitigate potential adverse flooding effects are identified as being:

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<sup>326</sup> AEE, p96

<sup>327</sup> AEE, p95

<sup>328</sup> Table 10-8 Summary of flooding risk ratings during operation, AEE, p96

- No increase in flood levels in a 1% Annual Exceedance Probability (AEP) event for existing authorised habitable floors that are already subject to flooding or have a freeboard less than 150mm;
- No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard over 150mm;
- No increase in 1% AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding;
- No more than a 10% reduction in freeboard in a 1% AEP event for existing authorised community, commercial, industrial and network utility building floors;
- No increase of more than 50mm in flood level in a 1% AEP event on land zoned for urban or future urban development where there is no existing habitable dwelling;
- No new flood prone areas; and
- No more than a 10% average increase of flood hazard (defined as flow depth times velocity) for main access to authorised habitable dwellings existing at time the Outline Plan is submitted. The assessment shall be undertaken for the 1% AEP rainfall event.

The AEE states that compliance with these outcomes should be demonstrated in the Outline Plan.

The Flood Hazard Report identifies a number of potential measures to mitigate operational flood hazards, which are summarised in the AEE.<sup>329</sup>

Proposed Condition 14 Flood Hazard and Proposed Condition 16 CEMP are noted in the AEE as the mitigation and condition response to the identified potential flooding effects.<sup>330</sup>

#### 4.10.2 Submissions

Some 14 submissions raise concerns relating to the operational, permanent, effects of the South FTN NoRs on flood hazard. The number of submissions to each of the South FTN NoRs regarding flood hazard issues is identified in Table 17 below:

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<sup>329</sup> AEE, p97

<sup>330</sup> Table 10-12 Summary of recommended mitigation and condition response, AEE, p113

**Table 17 Submissions to South FTN NoR relating to Flood Hazard Issues<sup>331</sup>**

<b>Topic</b>	<b>Notice of Requirement</b>	<b>Number of submissions</b>
Permanent (operational) flood hazard effects	NoR 1	4
	NoR 2	0
	NoR 3	3
	NoR 4	7

#### **4.10.3 Specialist assessment**

Mr Trent Sunich, Council’s consultant flood hazard specialist, has reviewed the South FTN NoRs, the relevant technical documents and the submissions relating to flood hazards (Attachment 2).<sup>332</sup>

Mr Sunich notes that the Flood Hazard Report addresses the flood hazard (overland flow and flood plains) as a result of constructing and operating the Project. The Requiring Authority has proposed a suite of stormwater management devices for each NoR route that Mr Sunich considers to be in line with current practice to address the effects of stormwater runoff from the impervious surfaces (e.g. stormwater contaminants, hydrology mitigation, flood peak flow attenuation). Mr Sunich notes that this has included provision within each designation boundary to construct and operate the management devices (e.g. treatment and attenuation wetlands).<sup>333</sup>

Mr Sunich notes that the risk rating criteria that has been used to inform the South FTN NoRs does not carry through to risk assessments in the respective NoRs Proposed Conditions.<sup>334</sup> Mr Sunich states that during pre-lodgement discussions with the Requiring Authority, he queried whether pre and post development scenarios (including the proposed terrain and alignments for each of the NoRs) should have been modelled. Mr Sunich states that the Requiring Authority indicated that role of the flood hazard assessment at this time is to identify the designation area is sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques and stormwater management devices.

On balance Mr Sunich agrees with the approach taken by the Requiring Authority and he finds the use of the risk criteria sufficient to identify the quantum of effect that currently exists for various properties (particularly in relation to moderate and high-risk areas), and correspondingly that will exist in the future when detailed design is completed via the proposed conditions of the Outline Plan process.

<sup>331</sup> Ibid, p8

<sup>332</sup> Trent Sunich, Auckland Council memorandum (technical specialist report to contribute towards Council’s section 42A hearing report), South FTN NoRs Stormwater and Flood Hazard Technical Assessment, 28 February 2024

<sup>333</sup> Ibid, section 6, p5

<sup>334</sup> Ibid

Mr Sunich is of the opinion that, in principle, the detailed design process will also capture flood hazard that has not been identified in the flood hazard report, but may eventuate as a result of matters such as land use change over the coming decades. Notwithstanding this, Mr Sunich does have some comments in relation to the Proposed Conditions, as discussed in his technical memo (**Attachment 2**) and noted below.<sup>335</sup>

Mr Sunich notes that the Requiring Authority says that assessing a higher flood depth would not lead to identification of any new properties at risk or any change in condition.<sup>336</sup> Mr Sunich agrees with the Requiring Authority's approach that carrying out sensitivity assessments, which take account of climate change, will be more beneficial to carry out at the resource consent phase of the Project rather than now.<sup>337</sup>

Mr Sunich is satisfied that the Flood Hazard Report is fit for purpose and the findings for the South FTN NoRs are suitable to understand the quantum of flood hazard effects. He notes that this conclusion is based on there being further detailed analysis to be carried out at the detailed design stage, meaning that there is a high reliance on the effectiveness of the Conditions in relation to floodplain and overland flow path flood hazard management.

Mr Sunich recommends amendments to the Proposed Conditions relating to flood hazard to ensure that flood hazards are appropriately avoided, remedied or mitigated during the design phase of the South FTN NoRs.

#### **4.10.3.1 Submission assessment**

Mr Sunich's assessment of submissions regarding flood hazards are set out in full in Appendix 1 to his technical memo (**Attachment 2**).

Issues raised by a number of submitters should, in Mr Sunich's opinion, be addressed by the Requiring Authority in evidence at the hearing. These relate to the following matters:

- (i) The matters raised in the submission by Dianne and Neville Smith (NoR 4 – 5) regarding the location of a stormwater pond on their land at 52 Popes Road; and regarding pedestrian safety in relation to a footpath located next to a deep drain;
- (ii) The matters raised in the submission by BJ Wallace Trust and SJ Wallace Trust (NoR 4 – 14) regarding the NoRs proposal to use the front yard of 296 Porchester Road as a temporary construction area conflicting with the consented stormwater solution for the full development of that site. Mr Sunich notes that the minor amendments made to the boundaries of the NoR by the Requiring Authority<sup>338</sup> reduces the extent of the NoR on the submitter's property by some 3,600m<sup>2</sup>;

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<sup>335</sup> Ibid, p6

<sup>336</sup> Ibid

<sup>337</sup> Ibid

<sup>338</sup> Refer section 2.6.5 of this report regarding the Requiring Authority letter to Council of 10 November 2023 advising of minor amendments to the NoR 4 boundaries.



- (iii) The matters raised in the submission by Zabeel Investments Ltd regarding 354 Porchester Road. The submission says the Flood Hazard Report does not assess effects on that site. Mr Sunich considers it would be helpful for the Requiring Authority to confirm whether the property is within the high flood risk category and identify potential mitigation options if required;
- (iv) Concerns raised in submissions regarding the effects of the South FTN NoRs and the proposed works on the inner working of sites affected by the NoRs.

Mr Sunich also notes that the comments made by the Manurewa Local Board seek clarity on the impact of stormwater and landscape response at Gallaher Park. Mr Sunich notes the Project proposes a wetland be located on a site adjacent to Gallaher Park, and he suggests the Requiring Authority comment on this matter in evidence at the hearing.

### Conclusions and recommendations

Mr Sunich is of the opinion that the Requiring Authority has used a fit for purpose flood hazard risk assessment method using a series of steps to establish and assign an operational risk rating. He also considers that the flood hazard modelling and reporting of the results is suitable to inform the quantum of flood hazard that exists and that it shows the designation extent is suitable to implement mitigation practices though the performance related flood hazard designation conditions.

Mr Sunich notes that further flood hazard modelling will be required as part of the Outline Plan including modelling of post project landforms and infrastructure.

Mr Sunich considers amendments to the Proposed Conditions are necessary. He recommends amendments to Proposed Condition 3 Land Use Integration Process to clarify that the information that Developers and Development Agencies may request of the Requiring Authority includes information regarding flood hazard management. The amendment recommended by Mr Sunich is as follows (additions shown in bold underlined):

#### 3. Land Use Integration Process

The Requiring Authority shall set up a Land use Integration Process

...

- (a) At any time prior to the Start of Construction, the nominated contact will be available to engage with a Developer or Development Agency for the purpose of:
  - (ii) responding to requests made to the Requiring Authority for information regarding design details that could assist with land use integration; and
  - (iii) receiving information from a Developer or Development Agency regarding master planning or land development details that could assist with land use integration
- (b) Information requested or provided under Condition 3(c) above may include but not be limited to the following matters:

- (i) design details including but not limited to:
  - A. boundary treatment (e.g. the use of retaining walls or batter slopes)
  - B. the horizontal and vertical alignment of the road (levels);
  - C. potential locations for mid-block crossings;
  - D. integration of stormwater infrastructure **and/or flood hazard management**;  
and
  - E. how to access traffic noise modelling contours to inform adjacent development.

Mr Sunich also considers that Proposed Condition 14 Flood Hazard<sup>339</sup> should be amended. The detailed reasons for this recommendation are set out in Mr Sunich's technical memo (**Attachment 2**), and these reasons are, in brief, regarding future-proofing the condition by removing metrics around specific numbers (e.g.: 150mm) that may become obsolete in the future, to ensure site-specific assessment to determine the suitability of flood level increase, and to include a classification metric to assess and identify risk rather than use a metric (10%) that has limited relativity.<sup>340</sup>

#### Flood Hazard

- (a) The Project shall be designed to achieve the following flood risk outcomes:
  - (i) no increase in flood levels in a 1% AEP event for existing authorised habitable, **community, commercial, and/or industrial** floors that are already subject to flooding ~~or have a freeboard less than 150mm;~~
  - ~~(ii) no more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard of over 150mm;~~
  - ~~(iii) no increase in 1% AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding;~~
  - ~~(iv) no more than a 10% reduction in freeboard in a 1% AEP event for existing authorised community, commercial, industrial and network utility building floors;~~
  - (ii) Maintain the minimum freeboard requirement as set out in the Auckland Code of Practice for Land Development for Subdivision Chapter 4: Stormwater Version 3.0, January 2022 or any update or replacement of that Code;**
  - (iii) no increase of more than 50mm in flood level in a 1% AEP event on land zoned for urban or future urban development where there is no existing dwelling; No increase in flood plain extent unless a site-specific flood assessment is provided with the Outline Plan that**

<sup>339</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

<sup>340</sup> Ibid, section 8, p10

**demonstrates there is no reduction in developable land in an urban zone or the Future Urban Zone;**

**(iv) new overland flow paths shall be diverted away from habitable floors and discharge to a suitable location with no increase in flood levels in a 1% AEP event downstream;**

**(v) no loss in conveyance capacity or change in alignment of existing overland flow paths, unless provided by other means;**

**(vi) no new flood prone areas; and**

**(vii) no more than a 10% average increase detrimental change of flood hazard (defined as flow depth times velocity) classification for main vehicle and pedestrian access to authorised habitable dwellings existing at the time the Outline Plan is submitted. The assessment of flood hazard shall be undertaken for the 10% and 1% AEP rainfall events.**

- (b) Compliance with this condition **(a) above** shall be demonstrated in the Outline Plan **developed in consultation with the Auckland Council Healthy Waters (or its equivalent)**, which shall include flood modelling of the pre-Project and post-Project 100-year ARI **10% and 1% AEP** flood levels (for Maximum Probable Development land use and including climate change).

...

#### **4.10.4 Planning assessment**

I rely on the expert opinion of Mr Sunich in making my planning assessment and recommendations.

I agree with Mr Sunich that the approach taken by the Requiring authority to flood hazards is appropriate for this stage of the design.

I consider it appropriate that the amendments to the Proposed Condition 3 and Proposed Condition 14 Flood Hazard as recommended by Mr Sunich are included in the South FTN NoRs, and accordingly include them in the set of recommended amendments to proposed conditions (**Attachment 5**).

I consider that it is appropriate that the Requiring Authority provide a response at the hearing on the following matters:

- the relief sought in the submissions and Mr Sunich's assessment of the submissions;
- the recommendations and conclusions in Mr Sunich's assessment; and
- the recommended amendments to Proposed Condition 3 and Proposed Condition 14 (**Attachment 5**).

## 4.11 Historic heritage

### 4.11.1 Requiring Authority assessment

The supporting technical reports for the South FTN NoRs included an Assessment of Archaeological and Heritage Effects.<sup>341</sup> Section 10.9 of the AEE provides a summary of the methodology, and assessment of effects contained in the Assessment of Archaeological and Heritage Effects.

#### 4.11.1.1 Positive Effects

Positive archaeological and heritage effects identified by the Requiring Authority are discussed in section 4.3.1 above.

#### 4.11.1.2 Archaeological and Heritage Effects

The Assessment of Archaeological and Heritage Effects states that there is potential for unrecorded archaeological and heritage sites to be encountered during construction, particularly in undeveloped paddocks and near waterways.<sup>342</sup> It recommends that all work should be undertaken under an archaeological authority obtained from HNZPT and should be guided by a Heritage Management Plan (HMP).

The Assessment of Archaeological and Heritage Effects states there are two archaeological sites potentially located within the NoR boundaries.<sup>343</sup> It notes that construction activities have the potential to destroy archaeological material if unable to be preserved or avoided.<sup>344</sup>

#### 4.11.1.3 Proposed mitigation measures

A number of the Proposed Conditions of the South FTN NoRs relate to potential effects on historic heritage, which may be summarised as follows:

- (ii) Proposed Condition 10 Cultural Advisory Report – the Requiring Authority will invite Mana Whenua to prepare a Cultural Advisory Report that, amongst other things, identifies cultural sites, landscape and values;
- (iii) Proposed Condition 12 ULDMP – shall include landscape and urban design details that cover, amongst other things, historic heritage places with reference to the Historic Heritage Management Plan required by Condition 24;
- (iv) Proposed Condition 18 Cultural Monitoring Plan;

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<sup>341</sup> Te Tupu Ngātahi Supporting Growth, Assessment of Archaeological and Heritage Effects, October 2023

<sup>342</sup> Ibid, p58

<sup>343</sup> Ibid, p54

<sup>344</sup> Ibid

- (v) Proposed Condition 24 Historic Heritage Management Plan (HHMP) – to be prepared in consultation with Council, HNZPT and Mana Whenua prior to the start of construction of a stage of work, with the objective of protecting historic heritage and to remedy and mitigate any residual effects as far as practicable.

Proposed Condition 24 HHMP contains some nine sub clauses detailing the matters that must be included in the HHMP, including the proposed methodology for investigating and recording post-1900 historic heritage sites (including buildings) that need to be destroyed, demolished or relocated and measures to mitigate any adverse effects.<sup>345</sup>

#### 4.11.2 Submissions

A submission on historic heritage and archaeology has been received from Heritage New Zealand Pouhere Taonga (Heritage NZ) on NoR 1.

Heritage NZ opposes the notices of requirement for the following reasons:

- a concern that there has not been adequate assessment of the notable trees (individual / groupings) for their historic heritage values (this matter is discussed in section 4.11.5 below);
- a concern with the lack of assessment and mitigation of the built heritage values when it is intended there be modification and or the destruction of features within the extents of the Papakura Old Central School and the Papakura/Karaka WWI Memorial. As these effects are already known of, the mitigation of those effects should not be addressed through the HHMP. The submission states that further historic heritage assessment is required to determine the effects of NOR 1.

The submission states that at a minimum the HHMP wording should be modified to specifically recognise and manage the historic heritage places already identified to be modified or destroyed as a result of NoR 1.

#### 4.11.3 Specialist assessment – Built Heritage

Mr Dan Windwood, Council’s Senior Built Heritage Specialist, has assessed the South FTN NoRs, the AEE, supporting Assessment of Archaeological and Heritage Effects and the submission by HNZPT, in relation to the subject of built heritage (**Attachment 2**).<sup>346</sup>

Mr Windwood notes that there are a number of built heritage items and sites that need to be addressed further at the HHMP stage, which may be directly or indirectly affected by the proposed works. These are set out in section 3.5 of Mr Windwood’s technical memo and include:

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<sup>345</sup> Attachment C Proposed Conditions, Form 18 South FTN, NoR 1

<sup>346</sup> Dan Windwood, Technical Memorandum for South FTN Notices of Requirement for works 1 to 4: Built Heritage, 14 February 2024

- (i) the Papakura Old Central School gates and wall (Scheduled on AUPOP #2830, a Category B scheduled historic heritage place);
- (ii) World War 1 Memorial (Scheduled on AUPOP #2801, a Category B scheduled historic heritage place); and
- (iii) Papakura Presbyterian Church complex (Scheduled on AUPOP #2800, Category B).

Mr Windwood also notes the unscheduled houses that are identified in the Assessment of Archaeological and Heritage Effects.

Mr Windwood considers the Project against the relevant provisions of the AUP:OP and considers it to be consistent with those provisions.<sup>347</sup>

#### **4.11.3.1 Submission assessment**

Mr Windwood has read and assessed the submission by HNZPT to NoR 1. He disagrees with the part of the submission regarding effects on the Papakura Old Central School (R12/1154 and 14.1 Schedule #02830) and the Papakura/Karaka WWI Memorial (14.1 Schedule #02801 and CHI#16003).

The HNZPT submission says the potential for the works to affect these places is already known and:

*Accordingly, as these effects are already known of, the mitigation of these effects should not be addressed through the HHMP. It is not appropriate to rely on the future HHMP process, particularly when it is stated in the AEE that the direct impacts of NoR 1 on historic heritage extents will be “avoided by the concept design” of the designation.*<sup>348</sup>

Mr Windwood is of the opinion that the gates and wall of the Papakura Old Central School have a lesser historical significance than the former school building due to their later date of construction in the 1920s, combined with a lack of the features typically found on memorial school gates that were built to commemorate former students who died during WW1. Mr Windwood considers relocation of the gates within the School site could potentially be carried out in a manner that retains the historic fabric. Mr Windwood considers the use of a HHMP is an appropriate way to manage the features of the site.<sup>349</sup>

In relation to the Papakura / Karaka WW1 Memorial, Mr Windwood also considers the potential effects of the Project can be adequately managed through the use of a HHMP.<sup>350</sup> Mr Windwood notes that the effects of the Project on the open space values are addressed by Mr Daniel Kinnoch and he defers to his expertise in that regard.

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<sup>347</sup> Ibid, para 4.1

<sup>348</sup> Submission of HNZPT to NoR 1, cited in Dan Windwood technical memo, para 5.1

<sup>349</sup> Dan Windwood, para 5.2

<sup>350</sup> Ibid, para 5.3

#### **4.11.3.2 Conclusions and recommendations**

Mr Windwood concludes that he considers the Project will result in limited risk to built heritage and that Proposed Condition 24 HHMP is appropriate.<sup>351</sup>

#### **4.11.4 Specialist assessment – Archaeology**

Ms Myfanwy Eaves, Council's Senior Specialist: Archaeology, has assessed the South FTN NoRs, the Assessment of Archaeological and Heritage Effects and submissions made on the South FTN NoRs in relation to archaeological matters (**Attachment 2**).<sup>352</sup>

Ms Eaves considers overall, the assessment and statements made in the Assessment of Archaeological and Heritage Effects are suitable at this stage. She agrees with statements made regarding individually identified sites, and notes that at this time, further research is required for some, particularly for post-1900 built historic heritage.

Ms Eaves is of the opinion that the methodology used allows competent discussion of the potential effects of the construction and operation of the individual South FTN NoRs. The overall effects of the proposed designation on the historic heritage (archaeology) resource are considered minimal if suitable conditions are included with the decision.

##### **4.11.4.1 Submission assessment**

Ms Eaves makes comment on the submission by HNZPT (NOR1 – 21). Ms Eaves is of the opinion that the Assessment of Archaeological and Heritage Effects adheres to current accepted format and methodology for historic heritage assessments as applied to major infrastructure projects and has considered the potential effects, both construction and operation, to the historic heritage resource at all locations as far as possible. Ms Eaves notes that a HHMP is advised to create an outline methodology which will direct the identification, avoidance, and mitigation of historic heritage.

Ms Eaves considers that as the HHMP will be certified by Council prior to any works commencing, it is entirely appropriate to expect a specific methodology for to be presented in this document, as the HHMP is a document that responds to the effects of the construction process. Ms Eaves notes that Proposed Condition 24 requires the HHMP to be prepared in consultation with Council, HNZPT and Mana Whenua.

In relation to the issues raised in the HNZPT submission regarding the adequacy of the assessment of effects on the heritage values of trees, Ms Eaves defers to the expert opinion of Council's Heritage arborist, Mr West Fynn (refer section 4.11.5 below and **Attachment 2**) but notes that the Requiring Authority's arborist has stated that arboricultural input into the final design and construction methodologies is a crucial

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<sup>351</sup> Ibid para 6.1-6.4

<sup>352</sup> Myfanwy Eaves, Technical Memorandum, Notices of Requirement for works NoR 1 to NoR 4: Historic heritage, archaeology, 9 February 2024

factor affecting the outcomes in terms of adverse effects on trees.<sup>353</sup> Ms Eaves considers that the Requiring Authority arborist, and heritage expert, have both advised caution in their assessments and both seek further investigation and research to occur to inform the final design.<sup>354</sup>

Ms Eaves also makes comment on the submission by Auckland Council's Parks and Community Facilities insofar as it refers to public open space with or without identified historic heritage features. Ms Eaves expresses a shared concern for the loss of historic heritage through the cumulative creep of road designations.<sup>355</sup> However, Ms Eaves considers the Proposed Condition 24 HHMP is appropriate to the management of the effects of historic heritage.<sup>356</sup>

#### **4.11.4.2 Conclusions and recommendations**

Ms Eaves considers the effects on historic heritage to be minor and supports the South FTN NoRs subject to Proposed Condition 24 HHMP being imposed.<sup>357</sup>

#### **4.11.5 Specialist assessment – Heritage Aboricultural**

Mr West Fynn, Council's Senior Heritage Arborist has assessed the South FTN NoRs, Assessment of Archaeological and Heritage Effects, Assessment of Aboricultural Effects and relevant submissions relating to heritage aboricultural matters (**Attachment 2**).<sup>358</sup>

Mr Fynn notes that the Requiring Authority's Assessment of Archaeological and Heritage Effects (section 5.1 and Table 5-1) says that 14 trees listed in the Cultural Heritage Inventory (CHI) with potential heritage values in NoR 1 are *the subject of a separate Assessment of Aboricultural Effects*. However, the Requiring Authority's Assessment of Aboricultural Effects does not identify the heritage values of trees and does not assess the potential adverse effects of the proposed works on those heritage values.

Mr Fynn notes that the two most relevant Proposed Conditions that may address effects on the heritage values of trees are proposed conditions 24 Historic Heritage Management Plan (HHMP) and proposed condition 27 Tree Management Plan (TMP).<sup>359</sup>

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<sup>353</sup> Myfawny Eaves, Technical Memo, para 5.11

<sup>354</sup> Ibid, para 5.14

<sup>355</sup> Ibid, para 5.17

<sup>356</sup> Ibid, para 6.4

<sup>357</sup> Ibid, para 7.3

<sup>358</sup> West Fynn, Memo, South FTN NoR with Possible Adverse effects on various notable trees within the proposed designation, 19 February 2024

<sup>359</sup> Ibid, p6



Mr Fynn identifies that the TMP in Proposed Condition 27 is limited to the trees listed in Schedule 3 of the proposed conditions. Trees that have been missed in the Requiring Authority's Assessment of Aboricultural Effects won't be included in that Schedule.<sup>360</sup>

Mr Fynn notes that the HHMP required by Proposed Condition 24 is written to relate to "historic heritage sites" and "historic heritage places". It is not apparent whether this HHMP would address effects on trees with heritage values, particularly given those values have not been identified in the AEE or supporting assessments.<sup>361</sup>

#### **4.11.5.1 Submission assessment**

The submission made by HNZPT to the NoR 1 is concerned that individual and groups of trees that are Notable Trees in Schedule 10 of the AUP or identified in the Cultural Heritage Inventory (CHI) may be impacted and that the effects of the Project on the heritage values of these trees has not been assessed.

Mr Fynn shares some of those concerns and recommends that the Requiring Authority provide information on this matter in evidence at the hearing.<sup>362</sup>

#### **4.11.5.2 Conclusions and recommendations**

Mr Fynn recommends that the Requiring Authority provide evidence at the hearing regarding the identification and assessment of trees with heritage values in the South FTN NoRs.

#### **4.11.6 Planning assessment**

I rely on the expert opinions of Mr Windwood, Ms Eaves and Mr Fynn in making my planning assessment in relation to effects of the South FTN NoRs on historic heritage and the Heritage NZ submission.

I agree with the conclusions and recommendations made by the Council's historic heritage experts, that Proposed Condition 24 HHMP should be retained.

I consider that the adverse effects on archaeological and built historic heritage can be adequately avoided, remedied or mitigated through the Proposed Conditions.

However, I consider it appropriate that the Requiring Authority provide a response at the hearing on matters that include:

- the relief sought in Heritage NZ's submission and the assessment of Council's specialists of that submission;

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<sup>360</sup> Ibid

<sup>361</sup> Ibid, p7

<sup>362</sup> Ibid

- Mr Fynn’s recommendation that the Requiring Authority provide evidence at the hearing regarding the identification and assessment of trees with heritage values in the NoR.

## **4.12 Māori culture, values, and aspirations**

### **4.12.1 Requiring Authority assessment**

Section 10.12 of the AEE discusses *effects on cultural sites, landscapes and values*. This section of the AEE outlines how the Project Team has engaged and worked collaboratively with Mana Whenua as partners throughout the preparation of the AEE, and engagement has taken place at monthly Kaitiaki forum over the past 5 years at a Project-specific level since the inception of the Detailed Business Case process in 2021.<sup>363</sup>

The AEE states that the Project Team engaged with Mana Whenua on the specific question of how to ensure Mana Whenua values, narratives, and heritage are incorporated into future design and implementation of the Project – in particular, how concepts of Rangatiratanga, Wairuatanga, Kaitiakitanga, Manaakitanga, Kotahitanga, and Mātauranga Māori – could be incorporated into conditions. The Proposed Conditions include that a Mana Whenua Kaitiaki Forum facilitates the ongoing partnership and provide for the exercise of these concepts and values.

A Cultural Values Assessment (CVA) is provided in the South FTN NoRs supporting documentation, as Appendix B to the AEE. The CVA was provided by Ngaati Te Ata Waiohū, and is partially redacted to avoid any information being mistreated or misinterpreted.<sup>364</sup>

### **4.12.2 Specialist assessment**

There is no Council specialist assessment for this section of the report.

### **4.12.3 Submissions**

There are no submissions received on the South FTN NoRs that raise matters relating to Māori culture and traditions or raise section 6(e) or section 7(a) of the RMA matters.

### **4.12.4 Planning assessment**

Only Mana Whenua can speak to the effect that the South FTN NoRs may have on their cultural values, heritage, and aspirations, and therefore my planning assessment is limited to noting the matters identified in the AEE regarding Māori culture, values, and aspirations and the Proposed Conditions relating to those matters.

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<sup>363</sup> AEE, p111

<sup>364</sup> Ibid, p112

The Requiring Authority has engaged with Mana Whenua and sought to partner with Mana Whenua in the preparation of the South FTN NoRs and AEE. The Proposed Conditions include provisions to support ongoing partnership with Mana Whenua, including the following conditions:

- Proposed Condition 9 SCEMP (b)(ii)D – must include methods for engaging with Mana Whenua to be developed in consultation with Mana Whenua
- Proposed Condition 10 Cultural Advisory Report – Mana Whenua are to be invited by the Requiring Authority to prepare this report, which has the objective of assisting in the understanding and identifying Ngā Taonga Tuku Iho ('treasures handed down by our ancestors') affected by the Project, to inform their management and protection;
- Proposed Condition 11 Mana Whenua Kaitiaki Forum – at least 12 months prior to the start of detailed design for a stage of work the Requiring Authority must invite Mana Whenua to establish a Mana Whenua Kaitiaki Forum. The objectives of this forum include how Mana Whenua values and narratives will be incorporated through the form of the Project, where opportunities for Mana Whenua to support the physical, mental, social and economic wellbeing for iwi and the local community will be provided through the Project;
- Proposed Condition 12 ULDMP (c) – Mana Whenua are to be invited to participate in the development of the ULDMP.

I support these Proposed Conditions, subject to the minor amendments that have been recommended to Proposed Conditions 9 and 12 in other sections of this report.

#### **4.13 Arboricultural effects**

The Requiring Authority's Assessment of Arboricultural Effects, lodged in support of the South FTN NoRs, identifies and assesses effects of the NoRs on trees.<sup>365</sup>

##### **4.13.1 Requiring Authority assessment**

###### **4.13.1.1 Positive Effects**

Positive effects identified by the Requiring Authority are discussed in section 4.3.1 above.

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<sup>365</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network, Assessment of Arboricultural Effects, October 2023

#### **4.13.1.2 Operational and Construction effects**

The Requiring Authority's Assessment of Aboricultural Effects provides an assessment of the effects of the future construction and operation of the Project on existing trees that trigger a District Plan consenting requirement under the AUP:OP. Any Regional Plan consenting triggers are stated as being intended to be managed through a future consenting process.<sup>366</sup>

Construction effects on trees are identified as including the removal of trees from the road reserve and from Open Space zoned land. Work may also occur in the root zone of protected trees that are within the South FTN NoRs or immediately adjacent to it, and works may require the trimming of trees.

The Project is stated as being likely to require the removal of 40 groups of trees and approximately 49 individual trees that would trigger a requirement for consent under the District Plan provisions for their removal. Subject to future detailed design, it is likely that all notable trees within and adjacent to the South FTN NoRs can be retained.

Effects on trees are intended to be managed through a Proposed Condition 27 Tree Management Plan (TMP). This condition requires that prior to the start of the construction of a stage of work a TMP be prepared with the objective of avoiding, remedying or mitigating adverse effects on those trees listed in a schedule to the Proposed Conditions (Schedule 3).

The TMP will confirm whether the trees identified in Schedule 3 of the Conditions still exist and demonstrate how the design and location of the works has avoided, remedied or mitigated adverse effects on those trees.<sup>367</sup>

Proposed Condition 12 ULDMP includes the requirement for planting details and maintenance requirements, including in 12(h)(i)a, the identification of existing trees and vegetation that will be retained with reference to the TMP and *where practicable, mature trees and native vegetation should be retained*, street trees, planting of stormwater wetlands, identification of vegetation to be retained and any planting requirements under the TMP, reinstatement planting of construction and site compound areas as appropriate, and integration with any planting requirements of any resource consents for the project.<sup>368</sup>

#### **4.13.2 Submissions**

Submission NoR 1 – 23.7 by Hansaben Patel opposes NoR 1 on the basis that it will significantly and adversely affect mature vegetation at their property at 1 Grande Vue Road.

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<sup>366</sup> Ibid, p87

<sup>367</sup> Attachment C Proposed Conditions for the Designation, Form 18 NoR 1

<sup>368</sup> Ibid

Submission NOR 1 21.1 by Heritage New Zealand Pouhere Taonga (HNZPT) is concerned that there has not been adequate assessment of the notable trees (individual/groupings) for their historic heritage values. The issues raised by this submission are addressed in section 4.11.5 of this report.

Submissions have also been received on matters relating to landscape and visual effects. These have been addressed in section 4.7 of this report.

#### **4.13.3 Specialist Assessment**

Mr Leon Saxon, Council's consultant Aboricultural specialist, has reviewed and assessed the South FTN NoRs and the Requiring Authority's Assessment of Aboricultural Effects (**Attachment 2**).<sup>369</sup>

Mr Saxon considers that the Assessment of Aboricultural Effects has used suitable, industry-standard, methodologies for obtaining relevant Aboricultural data to inform the assessment of effects.

Mr Saxon comments on the trees and groups of trees identified in the Assessment of Aboricultural Effects. He is of the opinion that where significant trees are to be removed, the TMP and ULDMP should provide for mitigation planting and where possible the detailed design and TMP should aim to retain trees.<sup>370</sup>

Mr Saxon considers that Proposed Condition 12 ULDMP includes elements related to replacement of tree planting and an emphasis on retention of mature trees and Proposed Condition 27 TMP focuses on avoiding, remedying or mitigating effects on trees identified in Schedule 3 of the Conditions. Mr Saxon is satisfied that the TMP will require an overall assessment of trees that require removal, in relation to ecosystem services, landscape systems and processes, natural character, and visual amenity and provide recommendations on how the ULDMP can replicate the benefits that the extant trees provide.<sup>371</sup>

Mr Saxon supports the use of an outcomes-based approach to mitigation of tree removal, as opposed to a like-for-like numbers-based approach. He is of the opinion that this allows the values of each tree requiring removal to be assessed and sufficient and suitable replacement planting to be allocated during compilation of the TMP and UDLMP.

##### **4.13.3.1 Conclusions and Recommendations**

Mr Saxon considers the Proposed Conditions for a TMP and a ULDMP to be suitable measures to manage potential adverse Aboricultural effects.<sup>372</sup> Mr Saxon notes that the submission of HNZPT raises issues regarding the assessment of heritage values of identified notable trees and with reference to the expert opinion of Mr West Fynn (refer

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<sup>369</sup> Leon Saxon, Aboricultural Memorandum, Aboricultural Assessment of 4 NoR for the South FTN, 20 February 2024

<sup>370</sup> Ibid, para 7.2-7.20, p4-7

<sup>371</sup> Ibid, para 7.21, p8

<sup>372</sup> Ibid, para 9.1-9.3, p10

section 4.11.5 above and **Attachment 2**) asks that the Requiring Authority address these issues in evidence at the hearing.<sup>373</sup>

#### **4.13.4 Planning assessment**

I rely on the expert opinion of Mr Saxon in making my planning assessment.

I note that the TMP is required to demonstrate how the design and location of the Project works has avoided, remedied or mitigated effects of construction activities on trees identified in Schedule 3 of the Proposed Conditions.

Relying on the expert opinion of Mr Saxon, and subject to the recommendation that the Requiring Authority provide evidence at the hearing regarding heritage values of trees to address the concerns raised in the submission by HNZPT, I consider that this TMP, together with Schedule 3 to the Conditions, Proposed Condition 12 ULDMP, and future regional consents required for effects on riparian trees and vegetation, will ensure that adverse aboricultural effects are avoided, remedied or mitigated.

Neither Mr Saxon nor I recommend any amendments to Proposed Condition 27 TMP.

In conclusion, I consider that it is appropriate that the Requiring Authority provides a response at the hearing on matters that include:

- the relief sought in the submissions and Mr Saxon's assessment of the submissions

#### **4.14 Ecological effects**

##### **4.14.1 Requiring Authority assessment**

Section 10.6 of the AEE and supporting technical document Terrestrial Assessment of Ecological Effects address the ecological effects of the South FTN NoRs.<sup>374</sup>

The AEE states that as the Project relates to proposed designations, the Assessment of Ecological Effects assesses District Plan terrestrial ecological matters only, and specifically those terrestrial ecological matters that fall within the AUP:OP district plan section.<sup>375</sup> Regional consenting requirements have informed the designation boundaries, primarily through efforts to avoid areas of identified ecological value through the alternatives assessment process.<sup>376</sup>

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<sup>373</sup> Ibid, para 10.1–10.3, p11

<sup>374</sup> Te Tupu Ngātahi Supporting Growth, Terrestrial Assessment of Ecological Effects, October 2023

<sup>375</sup> AEE, p89

<sup>376</sup> Ibid

#### **4.14.1.1 Positive effects**

Positive ecological effects of the South FTN NoRs identified by the Requiring Authority are discussed in section 4.3.1 above.

#### **4.14.1.2 Construction effects**

Section 10.6.3 of the AEE outlines that the potential construction effects of the Project on terrestrial habitat, bats, birds and lizards within and adjacent to the Project area, as they relate to district plan matters, include effects on long-tailed bats, birds and lizards:

- Disturbance and displacement of (including roost sites, and noise, light, vibration and dust from construction)
- Loss of habitat with removal of vegetation
- Loss of foraging habitat
- Mortality or injury during tree removal<sup>377</sup>

The ecological effects of tree removal are assessed overall as being low. The level of effect of tree removal on Threatened and At Risk (TAR) fauna species (long-tailed bats and birds) was assessed overall as low prior to mitigation. No impact mitigation is required in relation to long-tailed bats or birds.<sup>378</sup>

The ecological effects of vegetation removal on native herpetofauna (lizard) species was assessed as high prior to mitigation, and impact management is identified as being required.<sup>379</sup>

#### **4.14.1.3 Operational effects**

District plan ecological effects assessed for the operational phase of the Project were disturbance and displacement of long-tailed bat roosts and threatened bird nests, and loss of connectivity due to the presence of the road (fragmentation of habitat, including light and noise effects).<sup>380</sup>

The AEE states that a very low level of effect was determined for all South FTN NoRs for all TAR and native birds, and as negligible for herpetofauna prior to mitigation (due to the existing presence of infrastructure).<sup>381</sup>

#### **Proposed measures to avoid, remedy or mitigate effects**

The Assessment of Ecological Effects identified that a Lizard Management Plan (LMP) should be developed for the NoRs.

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<sup>377</sup> Ibid, section 10.6.3, p90-91

<sup>378</sup> Ibid, p91-92

<sup>379</sup> Ibid

<sup>380</sup> Ibid, section 10.6.4, p92

<sup>381</sup> Ibid, p93

Proposed Condition 25 Pre-Construction Lizard Survey requires for each of the four NoRs an updated survey of native lizards in the locations shown in Schedule 2 Identified Native Lizard Habitat Areas, which forms part of the Conditions. If the survey confirms the presence of native lizards of value then a Lizard Management Plan is to be prepared in accordance with Proposed Condition 26 Lizard Management Plan.

The LMP will consider a range of matters, including preconstruction survey and relocation of lizards. The need for Wildlife Act 1953 approvals, as well as the need to be consistent with regional consenting requirements are noted in the AEE.<sup>382</sup> With this mitigation the effects of construction are considered as negligible to low.<sup>383</sup>

#### **4.14.2 Submissions**

Submission NoR 2 - 10.1 by Auckland Council – Parks and Community Facilities raises a concern about the effects of NoR 2 on 279 Great South Road, Drury, including the scale of effects on the vegetation, the stream, and its function as an esplanade reserve.

#### **4.14.3 Specialist assessment**

##### **4.14.3.1 Terrestrial Ecology**

Mr Simon Chapman, Council's consultant terrestrial ecology specialist, has assessed the South FTN NoRs, the Assessment of Ecological Effects and submissions on terrestrial ecology matters (**Attachment 2**).<sup>384</sup>

Mr Chapman considers that the Assessment of Ecological Effects provides an adequate assessment of effects and the South FTN NoRs appropriately avoids potential and adverse effects through the concept design and in the General Arrangement Drawings. However, he considers there to be adverse effects that are not mitigated, and there to be a gap between the NoRs and the regional consenting process.<sup>385</sup>

The key ecological issues identified by Mr Chapman are:<sup>386</sup>

##### **NoR 1 and NoR 2**

- Native tree / vegetation removal effects on highly mobile fauna.
- Native tree / vegetation removal effects on freshwater ecosystem.
- Lack of specific requirements for addressing both loss of value and extent of stream/wetland habitat (including loss of riparian vegetation).

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<sup>382</sup> Ibid

<sup>383</sup> Ibid, p94

<sup>384</sup> Simon Chapman, Technical expert s.42A Memo – Terrestrial Ecology, 4 March 2024

<sup>385</sup> Ibid, section 3.3, p5

<sup>386</sup> Ibid, Table 1, p5



#### NoR 3 and NoR 4

- Native tree / vegetation removal effects on highly mobile fauna.

Mr Chapman provides his opinion in relation to each of the key ecological issues that he has identified, and the discussion of these issues contained in Mr Chapman's memo is summarised in the paragraphs below.

#### Vegetation Removal effects on Highly Mobile Fauna

In relation to the effects of native tree and vegetation removal on highly mobile fauna, Mr Chapman refers to National Policy Statement for Indigenous Biodiversity (NPS:IB) and the direction this gives for the identification and management of areas outside of Significant Natural Areas that support specified highly mobile fauna. Mr Chapman refers to the Requiring Authority response to Council's section 92 request for further information regarding this matter, which was that no further effects management is required for highly mobile fauna.<sup>387</sup>

Mr Chapman is of the opinion that the removal of large trees poses a threat to fauna, flora and the stream ecosystems. There is potential for non-TAR (Threatened, At-Risk) birds to be present and breeding within vegetation that requires a District Plan land use consent for removal, and that will therefore not require a consent if the work is for a purpose authorised by the designation.<sup>388</sup>

Mr Chapman is concerned that effects on fauna that may be present at the time of construction will not be addressed. Mr Chapman considers the inclusion of ecological input during the detailed design phase for the works that would be authorised by the South FTN NoRs is needed, and particularly in relation to lighting and the potential effects on bats.

Mr Chapman notes that the Proposed Conditions do not require any updated survey of fauna present, and if such a survey was done, then measures would then need to be developed to ensure adverse effects on that fauna is addressed. Mr Chapman considers that an Ecological Management Plan is the appropriate way for this issue to be addressed.<sup>389</sup>

Mr Chapman notes that Council's section 92 request for further information requested information as to what was intended to be included in the Ecological Management Plan listed in Proposed Condition 7 Outline Plan. The Requiring Authority's response was that this reference would be updated to 'Lizard Management Plan', as this was the only mitigation recommended in the Assessment of Ecological Effects.<sup>390</sup>

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<sup>387</sup> Ibid, section 4.1, p5-6

<sup>388</sup> Ibid, p6

<sup>389</sup> Ibid, p5-6

<sup>390</sup> Ibid, p6

Mr Chapman also notes that the Council's section 92 request for further information requested that an Avifauna Management Plan for the South FTN NoRs to address TAR birds. Mr Chapman explains that there is potential for vegetation clearance and construction works authorised through the designation proposed by the South FTN NoRs to have an adverse effect on avifauna that may be present in the area.<sup>391</sup>

Mr Chapman is of the opinion that the South FTN NoRs are a large project that will affect a range of ecosystems and indigenous species and an Ecological Management Plan would be appropriate.

Mr Chapman considers that a pre-construction survey would identify whether Threatened or At Risk fauna are present and affected by the works and an Ecological Management Plan would generally have the objective of avoiding, remedying, mitigating, offsetting or compensating adverse effects on the identified biodiversity areas.<sup>392</sup>

#### Vegetation Removal effects on freshwater

In relation to the removal of vegetation near streams in areas where existing bridges are to be removed and replacement bridges constructed, Mr Chapman notes that Ms Bootsma, Council's earth streams and trees specialist, addresses these issues (refer to the section below and **Attachment 2**).

#### **4.14.3.2 Submission assessment**

Mr Chapman has assessed the issues raised in the submission by Auckland Council Parks and Community Facilities regarding the effects of NoR 2 on 279 Great South Road, Drury.

The concerns raised in this submission are also addressed by Mr Kinnoch, in relation to parks and open space planning matters, and he identifies that property to be the Hingaia Esplanade Reserve.<sup>393</sup>

Mr Chapman notes that the Hingaia Stream Reserve is included in NoR 2 as an area of the works for the replacement of the Hingaia Stream bridge, and construction works may require the removal of sizeable willow trees (identified as Tree Groups 115 and 116).

Mr Chapman notes that the removal of some of the trees may be authorised by the South FTN NoRs and others may require regional consents due to their location in the riparian margin. Mr Chapman is of the opinion that as esplanade reserves play a role in protecting freshwater environments the matter should be given specific attention. However, it is difficult to determine effects (including on the freshwater environment) as

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<sup>391</sup> Ibid, p8

<sup>392</sup> Ibid, para 4.1.5, p6-7

<sup>393</sup> Mr Kinnoch, op.cit. para 6.8, p53. Refer para 5.48-5.52 of Mr Kinnoch's Memo for discussion and images of the features of the Hingaia Stream Reserve.

it is not known which trees and what consenting requirements may be involved.<sup>394</sup>

#### **4.14.3.3 Conclusions and recommendations**

Mr Chapman considers that while managing effects on herpetofauna are sufficiently addressed in the Proposed Conditions, the same cannot be said in relation to TAR avifauna or bats.

Mr Chapman considers a pre-construction fauna survey and an Ecological Management Plan should be required as a condition of the South FTN NoRs and recommends replacement of Proposed Condition 25 Pre-Construction Lizard Survey and Proposed Condition 26 Lizard Management Plan<sup>395</sup> with new conditions as follows:

##### 25. Pre-Construction Ecological Survey

(a) At the start of detailed design for a Stage of Work, an updated ecological survey shall be undertaken within the works footprint by a Suitably Qualified and Experienced Person. The purpose of the survey is to inform detailed design and guide ecological management by identifying if and where indigenous fauna (including Regionally or Nationally At-Risk or Threatened species) are present.

(b) Mana Whenua shall be invited as partners to observe how the ecological survey in (a) will be undertaken.

(c) If the ecological survey confirms the presence of indigenous bats, birds and/or lizards in accordance with Condition 25(a) then an Ecological Management Plan shall be prepared in accordance with Condition 26.

(d) if the ecological survey in accordance with Condition 25(a) does not confirm the presence of indigenous bats, birds and/or lizards then a report setting out the methodologies and results of the ecological survey shall be provided to Council at the time of the Outline Plan for that Stage of Works.

##### 26. Ecological Management Plan (EMP)

(a) An EMP shall be prepared for all areas where indigenous fauna are confirmed in accordance with Condition 25 prior to the Start of Construction for a Stage of Work. The objective of the EMP is to minimise adverse effects of the Project on indigenous bats, birds and lizards as far as practicable.

(b) The EMP shall provide a summary of the methodology used and the results of the Ecological Survey.

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<sup>394</sup> Simon Chapman, op.cit., Table 5.2, p12

<sup>395</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

(c) The EMP shall set out the methods and other details relevant to achieving the objective as follows:

(i) if an EMP is required in accordance with Condition 25(c) for the presence of long-tailed bats the following information shall be provided in the EMP:

A. measures to minimise disturbance from construction activities within the vicinity of any active roosts that are discovered until such roosts are confirmed to be vacant of bats;

B. how the timing of any construction work in the vicinity of any maternity long tail bat roosts will be limited to outside the bat maternity period (between December and March) where reasonably practicable;

C. details of areas where vegetation is to be retained where practicable for the purposes of the connectivity of long tailed bats;

D. details of how bat connectivity will be provided and maintained (e.g. through the presence of suitable indigenous, or exotic trees or artificial alternatives) will be provided and maintained; and

E. where mitigation isn't practicable, details of any offsetting proposed.

(ii) If an EMP is required in accordance with Condition 25(c) for the presence of Threatened or At-Risk birds (excluding Wetland Birds) the following information shall be provided in the EMP:

A. how the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;

B. where works are required within the Confirmed Biodiversity Area during the bird breeding season (including Rail), methods to minimise adverse effects on Threatened or At-Risk birds; and

C. details of grass maintenance if Rail are present.

(iii) If an EMP is required in accordance with Condition 25 for the presence of Threatened or At-Risk wetland birds the following information shall be provided in the EMP:

A. how the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;

B. where works are required within the Confirmed Biodiversity Area during the bird breeding season, methods to minimise adverse effects on Threatened or At-Risk wetland birds; and

C. undertaking a nesting bird survey of Threatened or At-Risk wetland birds prior to any Construction Works taking place within a 50m radius of any identified Wetlands.

(iv) If an EMP is required in accordance with Condition 25 for the presence of native lizards the following information shall be provided in the EMP:

A. a detailed description of the methodologies and timing for survey, trapping, and relocation of salvaged native lizards;

B. a detailed description of the lizard release site(s):

C. details of measures to ensure the relocation site is suitable protected and remains viable as a long-term habitat (e.g. covenants, consent notices etc.);

D. details of measures to ensure the lizard release site is suitably managed to ensure appropriate habitat for native lizards (e.g. provision of additional refugia, weed and pest management);

E. monitoring of relocation sites if necessary to evaluate translocation success; and

F. the LMP shall be consistent with any native lizard management measures to be undertaken in compliance with conditions of any regional resource consents granted for the Project.

#### **4.14.3.4 Freshwater Ecology**

Ms Antoinette Bootsma Council's Senior Specialist - Earth, Streams and Trees has reviewed the South FTN NoRs and supporting documents, including the AEE, Appendix A Assessment of Alternatives Report<sup>396</sup>, and Assessment of Ecological Effects (**Attachment 2**).<sup>397</sup>

Ms Bootsma addresses ecological effects other than terrestrial ecology, which are addressed by Mr Chapman above. Ms Bootsma notes the ecological effects identified in the Assessment of Ecological Effects include those relating to the construction effects on ten streams and three natural inland wetlands.

Ms Bootsma recognises that effects on aquatic ecological features, including streams and wetlands located in the proposed designations, are regulated primarily through regional consenting processes, including the AUP(OP) Chapter E3 and the NES-F (2020).

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<sup>396</sup> Te Tupu Ngātahi Supporting Growth, South Frequent Transit Network Assessment of Effects on the Environment, Appendix A: Assessment of Alternatives Report, 13 October, 2023

<sup>397</sup> Ms Antoinette Bootsma, Technical Expert Memo, s42A Report, South FTN, 5 March 2024

The key issues identified by Ms Bootsma relate to the loss of wetlands and streams and removal of vegetation that may or may not (according to the Requiring Authority's Assessment of Aboricultural Effects) be subject to Regional Plan controls as vegetation within the Riparian area. These issues arise with the South FTN NoRs in the context of the National Policy Statement Freshwater Management 2020 (NPS-FM) and consideration of alternative routes, sites and methods, whether the NoRs enable demonstration of avoidance of wetland loss, and whether there are opportunities within or adjacent to the NoRs for potential future consenting compensation requirements.<sup>398</sup>

Ms Bootsma notes that the Assessment of Ecological Effects discusses the options assessment process and considers that this process demonstrates consideration of impacts to streams and wetlands and supports the effects management hierarchy through which adverse effects are avoided where practicable, consistent with the requirements of the NPS-FM (2020). Ms Bootsma considers this approach further supports alignment of the designations with future regional consenting considerations.<sup>399</sup>

Ms Bootsma agrees with the approach taken in the Assessment of Ecological Effects, that where stream loss is likely to be unavoidable, there are opportunities within the proposed designation boundary of the NoR or within adjacent public land to accommodate potential future compensation requirements.<sup>400</sup>

#### **4.14.3.5 Submission assessment**

Ms Bootsma comments on the issues raised the submission by Auckland Council – Parks and Community Facilities (NoR 2 – 10.1) regarding effects on the Hingaia Stream Reserve. Ms Bootsma observes that regional consenting regulations including the NES-F and AUP:OP will require implementation of the effects management hierarchy.

In relation to the Manurewa Local Board recommendation Supporting Growth work in partnership with Eke Panuku on planting and restoration enhancement opportunities around the Puhinui Stream near the Great South Road (**Attachment 4**), Ms Bootsma notes that the matter of restoration planting will be addressed at the time of regional consenting.<sup>401</sup>

#### **4.14.3.6 Conclusions and recommendations**

Ms Bootsma considers that, given the assumption that effects on aquatic ecological features, including the removal of vegetation from wetland and the riparian yard, will be considered during regional consenting processes, no additional conditions are needed for the South FTN NoRs.<sup>402</sup>

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<sup>398</sup> Ibid, section 4.5, p3

<sup>399</sup> Ibid, section 5.2, p5

<sup>400</sup> Ibid, section 5.5, p5-6

<sup>401</sup> Ibid, p7

<sup>402</sup> Ibid, p8

Ms Bootsma is of the opinion that the advice note in Proposed Condition 26 regarding regional consenting matters should be retained.

#### **4.14.4 Planning Assessment**

I rely on the expert opinions of Mr Chapman and Ms Bootsma in making my planning assessment and recommendations in relation to ecological effects of the South FTN NoRs.

##### **4.14.4.1 Terrestrial ecology**

As noted previously, a designation authorises work in accordance with the designation, without the need for district plan resource consent. In relation to the concerns raised by Mr Chapman, I note that they relate both to vegetation removal that is subject to district plan level rules, for the removal of trees and other vegetation; and to construction activities that lead to disturbance and displacement of habitats and the potential for direct injury or death of indigenous fauna. The removal of vegetation that would be authorised by the designations has the potential to disturb bat roosts, bird nesting, loss of habitat and direct injury. Construction activities, such as night time works involving lighting, have the potential to disrupt bat movements.

It acknowledged that the effects of removal of riparian vegetation, and loss of aquatic habitat arising from works affecting streams and wetlands, are managed through the regional consenting. The Wildlife Act 1953 also applies in relation to effects on bats, birds and herpetofauna.

I am of the opinion that the issues that Mr Chapman seeks to address in the recommended amendments to the Proposed Conditions are matters that are within the scope of matters to be addressed through conditions on a designation.

Mr Chapman has recommended that the Proposed Conditions be amended by the replacement of Proposed Condition 25 Pre-construction lizard survey with a new condition that requires a pre-construction ecological survey within the works footprint, to identify whether indigenous fauna are present at the time of the works. That condition will operate together with a new condition to replace Proposed Condition 26 Lizard Management Plan, which requires an Ecological Management Plan to address those areas where the presence of indigenous fauna has been confirmed by the pre-construction ecological survey.

I note that a number of other route protection notices of requirement in largely urban environments include a condition for a Pre-Construction Ecological Survey and Ecological Management Plan.<sup>403</sup> Relying on the expert opinion of Mr Chapman, I am of the opinion that the actual and potential adverse ecological effects of the works that the South FTN NoRs would enable necessitate the additional conditions as recommended by Mr Chapman.

Proposed Condition 25 Pre-construction lizard survey and Proposed Condition 26

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<sup>403</sup> For example, the Notice of Requirement for Airport to Botany Bus Rapid Transit Project

Lizard Management Plan are limited in scope to lizards, and do not include effects of the works on other fauna. These Proposed Conditions are also limited to apply to Schedule 2 Identified Native Lizard Habitat Areas, which list and map groups of trees in NoR 1, 2 and 3. As noted earlier in section 4.2.1, Proposed Conditions 25 and 26 effectively seek to 'freeze' the receiving environment to the present day areas identified in Schedule 2, whereas by the time the works are to be constructed the lizards may have moved to other areas. The Proposed Conditions would mean that the effects on the lizards in their new location would not be avoided, remedied or mitigated.

Therefore, I am of the opinion that the new conditions 25 Pre-Construction Ecological Survey and 26 Ecological Management Plan in substitution of Proposed Condition 25 Pre-construction lizard survey and Proposed Condition 26 Lizard Management Plan as recommended by Mr Chapman are appropriate and necessary. I include those amendments (with minor punctuation modifications) in the set of recommended amendments to proposed conditions (**Attachment 5**).

#### **4.14.4.2 Freshwater Ecology**

I agree with the AEE that the assessment of effects needs to relate to district plan matters contained in the Auckland Unitary Plan Operative in Part (AUP:OP) as those are the potential effects that will be authorised by the designations sought. Any necessary regional plan consents and/or consents under the National Environmental Standards for Freshwater (NES-F) will need to be sought at a later date for the Project, with any potential effects or required mitigation on such matters assessed fully at that time, as values may change.

However, consideration of the potential ecological effects of the Project on ecological features likely requiring regional or NES resource consents and/or wildlife permits at a later stage of the Project are relevant when considering the South FTN NoRs with particular regard to the NPS-FM. That involves consideration of the extent to which the assessment has addressed those relevant matters to inform the proposed designation boundaries for the Project. Ms Bootsma has identified that the short listing of 151 options through a multi-criteria assessment process demonstrates consideration of impacts to streams and wetlands and supports demonstration of the effects management hierarchy avoidance of adverse effects where practicable, consistent with the requirements of the NPS-FM (2020).<sup>404</sup> Ms Bootsma considers this approach further supports alignment of the South FTN NoRs with future regional consenting considerations.<sup>405</sup>

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<sup>404</sup> Ms Bootsma, op.cit., p5

<sup>405</sup> Ibid



I note that Ms Bootsma considers that the advice note in Proposed Condition 26 regarding the need for stream and wetland restoration needs to be retained, to point to the future regional consenting matters that must be addressed, and my recommended amendments to proposed conditions in **Attachment 5** retain that advice note underneath the new Condition 26 Ecological Management Plan.

In conclusion, I consider that it is appropriate that the Requiring Authority provides a response at the hearing on matters that include:

- the relief sought in the submissions and the assessments of submissions made by Mr Chapman and Ms Bootsma;
- the recommendations and conclusions in Mr Chapman's and Ms Bootsma's assessments; and
- the recommended amendments to the Proposed Conditions (**Attachment 5**).

#### **4.15 Construction effects**

##### **4.15.1 Requiring Authority assessment**

Section 9.2 of the AEE explains the intended construction methodology for the South FTN NoRs, including: typical construction work areas, general construction activities, enabling works, utility relocation and protection, site establishment, site clearance and demolition, traffic management and access, construction traffic, bridges and structures, earthworks, pavement works and streetscape, and indicative construction staging and programme.

Proposed Condition 16 CEMP requires a CEMP to be prepared prior to the start of construction of a stage of work and the objective of a CEMP is to set out the procedures and methods to avoid, remedy or mitigate adverse effects associated with Construction Work as far as practicable. Matters to be included in a CEMP include methods for controlling dust and the removal of debris from public roads or places.

Proposed Condition 17 Complaints Register requires a record to be kept of any complaints received during Construction Works and the measures taken to respond to the complaint.

##### **4.15.2 Submissions**

There are a number of submission points which raise matters relating to construction effects. These matters include:

- general concerns regarding dust from demolition and construction activities
- concerns with dust from construction vehicle movements
- potential effects of dust on business (restaurant) activities

#### **4.15.3 Specialist Assessment**

Mr David Russell, Council Development Engineer, has reviewed and made comment on the Requiring Authority's construction methodology and assessed submissions in a technical memo (**Attachment 2**).<sup>406</sup>

Mr Russell is satisfied that the AEE addresses land development engineering issues in the AUP:OP.

#### **4.15.4 Planning Assessment**

Regional Plan provisions relating to air discharge consents and earth working are likely to apply to some aspects of the construction of the Project. These include provisions: Chapter E11 – Land disturbance – Regional; and E14 – Air Quality in respect of both construction and operational air quality effects.

The Proposed Conditions, and in particular CEMP and Complaints register would appear to appropriately manage the potential direct effects of construction activity and at this time, prior to having heard the evidence of submitters and the Requiring Authority, I do not propose any amendments to those Proposed Conditions in relation to direct construction effects.

### **4.16 Property and land use effects**

Property and land use effects are identified and assessed in the AEE.

#### **4.16.1 Requiring Authority assessment**

##### **4.16.1.1 Positive effects**

Positive effects identified by the Requiring Authority are discussed in section 4.3.1 above.

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<sup>406</sup> David Russell, Technical Expert Evidence for s.42A Report, South FTN, 14 February 2024

#### **4.16.1.2 Pre-implementation, construction and post-construction effects**

Section 6 of the AEE summarises the assessment of alternative routes, sites and methods. This process identified the preferred route for each part of the Project, and then the form and function and location were identified with factors such as opportunities to avoid or reduce impact on known environmental and cultural features, values and constraints, and enabling reasonable access to and use of adjoining properties and buildings.<sup>407</sup> The preferred route then progressed to concept design, involving allowance for earthworks, property access and stormwater requirements. The concept design is the basis of the Project assessed in the AEE.<sup>408</sup>

Section 6.3 of the AEE explains the alternative methods considered included designations, resource consents, plan changes/overlays, and landowner/developer agreements.<sup>409</sup>

Section 10.10 of the AEE addresses construction property effects and refers to Appendix A to the AEE, Assessment of Alternatives.

The AEE explains that the optioneering process set out in the Assessment of Alternatives shows the level of refinement of the corridor form and function that occurred. Engagement with affected stakeholders also, the AEE states, involved further efforts to refine the corridor design and designation footprints.<sup>410</sup>

##### Pre-implementation property effects

The effects of the designation before the Project is constructed are identified in the AEE as:

- i) Uncertainty associated with extended lapse periods.

Longer lapse periods can result in uncertainty around the timing and nature of effects, and impact on how a property that is designated can be used and whether it can be sold. The AEE states *lapse periods of up to 15 years are commonly sought for linear infrastructure projects, where corridors require protection from competing land use development pressures.*<sup>411</sup>

Mitigation of the effects of uncertainty about when the Project will be constructed are identified as Proposed Condition 2 Project Information condition Proposed Condition 9 SCEMP.

- ii) Continued use of land and s.176 approvals.

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<sup>407</sup> AEE, op. cit, section 6.2, p34-35

<sup>408</sup> Ibid, p35

<sup>409</sup> Ibid

<sup>410</sup> Ibid, 10.10 Property Effects, p106

<sup>411</sup> Ibid, p107

The AEE notes that unchanged use of land that is designated is not precluded. However, section 176(1)(b) of the RMA restricts the carrying out of work on designated land that would prevent or hinder the designated work without first obtaining the requiring authority's written consent.

The AEE states that information on the section 176 process will be able to be obtained from the Project Information website.

iii) Public Works Act (PWA) process.

The AEE states that where landowners contact Auckland Transport in advance of the property acquisition process, the Requiring Authority will engage with those landowners to direct them to information about the PWA process, explain timeframes for the corridor delivery, and explain how to seek written consent under s.176(1)(b) of the RMA for works within the designation.

#### Property effects during construction

The Requiring Authority's approach to the spatial extent of the designations is discussed in section 9 of the AEE and notes that:

*The design undertaken for the Project has focused on developing an indicative design that is sufficient to inform the proposed designation footprint and to assess an envelope of effects, whilst recognising the need for flexibility required due to the uncertainty of an evolving environmental context – both within urbanised areas and future urban areas traversed by the Project.<sup>412</sup>*

Section 10.10.4 of the AEE sets out the property effects during construction. The effects identified are:

- land affected permanently – land required for the ongoing operation and maintenance of the Project would typically be acquired 2-3 years prior to construction. The PWA is the framework for compensation to landowners.
- land affected temporarily – effects can be disruption to access, vegetation loss, and noise and vibration effects.

The AEE states that the effects of construction will be managed and minimised through the CEMP.<sup>413</sup>

#### Post-construction property effects

The AEE identifies that on completion of the works:

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<sup>412</sup> AEE, p41

<sup>413</sup> Ibid, p109

- private land not required for on-going operation, maintenance or effects management will be reintegrated with the balance of land parcels in coordination and discussion with directly affected landowners. This may include the reinstatement of driveways, parking, fences, gardens, yards, and re-integrating construction areas (e.g. batters, stormwater wetlands) with the surrounding landform.
- the designation footprint will be reviewed upon completion of the project and will be uplifted from those areas not required for the on-going operation, maintenance or effects mitigation associated with corridors.<sup>414</sup>

The AEE acknowledges the effects of an extended lapse period for a designation as a preconstruction effect. Measures included in the Proposed Conditions to address this potential adverse effect include:

- Proposed Condition 2 Project Information - a project website, or equivalent virtual information source, to be established within 12 months of the date from when the designation is included in the AUP;
- Proposed Condition 4 Designation Review - that the Requiring Authority reviews, within 6 months of completion of construction (or as soon as otherwise practicable), the extent of the designation to identify any areas of designated land that it no longer requires for the on-going operation, maintenance or mitigation of effects; and gives notice under s182 of the RMA for the removal of the parts that are no longer required;
- Proposed Condition 9 the preparation of a Stakeholder Communication and Engagement Management Plan.

#### 4.16.2 Submissions

Issues regarding property effects are raised in a large number of submissions and points of submission as identified in Table 18 below:

**Table 18 Submissions Regarding Effects on Property and land use**

South FTN NoRs	Number of Points of submission regarding effects on property
NoR 1	19
NoR 2	12
NoR 3	44
NoR 4	27

The key property effects issues raised in submissions include:

- a) extent of the designation boundary and effects on specific properties
- b) length of lapse periods

<sup>414</sup> Ibid, p108. Section 182 Resource Management Act 1991

- c) effects on residential property values
- d) effects on businesses and business viability
- e) reinstatement of property
- f) acquisition and compensation
- g) engagement and consultation
- h) effects on network utilities/other infrastructure providers.

The relief sought includes:

- i) withdraw the NoRs or confirm only if subject to modifications and/or conditions
- ii) amendments to the designation boundaries to address issues of concern identified in the submission. These include:
  - exclude specific properties from the designations and amend the directly affected properties schedules
  - ensure that there is no encroachment within existing properties by physical infrastructure including retaining walls, batter slopes, busways, road lanes, cycle lanes, footpaths, berms
  - reduce construction areas, batter slopes or earthworks to minimise the amount of land required and the effects on directly affected properties
  - separate designations for construction areas and permanent areas i.e. two separate designations showing the operational extent and the construction extent
  - remove properties from within designation boundaries to take into account existing resource consents and landscaping requirements of the AUP:OP and resource consents that have been granted
  - consider alternative locations/routes i.e., other side of the road where it is yet to be developed to minimise the effects on existing residential/commercial properties
  - remove the extent of the designation from commercial property so that premises and lease agreements are not affected
  - reduce the scale of effects on frontages
  - Review the extent of the designation before the designation is confirmed
  - impose conditions to require ongoing consultation with landowners around the extent of the designation boundary prior to the designations being confirmed.
- iii) Compensation and property acquisition:
  - purchase entire property, not just area to be designated

- purchase property now

iv) Amendments to the reduce the lapse period:

- 15 years is not appropriate particularly where there is no funding or certainty as to the timing of the construction
- An extended lapse period of 15 years creates uncertainty which the statutory lapse period of 5 years seeks to avoid
- The lengthy lapse period, construction duration of 2-3 years, and indicative design approach presents uncertainties for submitters and ability to plan for their property, with corresponding social and economic effects
- Provide for a standard lapse period as the extended lapse period blights properties for too long, will make redevelopment difficult and inefficient, and does not provide sufficient certainty of outcomes prior to and after implementation of the designation
- Reduce the lapse period from 15 years to 10 years to encourage the project to be actioned with more urgency
- A lapse date of 15 years is a significant period when impacting land owned by others. Reduce the lapse period to 5-10 years
- The effect of a designation with a 15 year lapse period is it effectively prevents the submitter from developing their land until the works are constructed. There is no guarantee that s.176 approval from the Requiring Authority would be forthcoming

(v) Amend conditions

- Each management plan should be required to achieve a clear objective and Council should retain a role of certifying that the objective has been achieved.

#### 4.16.3 Specialist Assessment

No Council specialist assessment has been specifically sought for property and land use effects. However, I consider that there is an overlap between the property effects, with a number of other effects, which have been assessed by Council's specialists in other sections of this report, as follows:

- vehicle access, parking and manoeuvring (section 4.4)
- noise and vibration (section 4.5)
- urban design effects (section 4.6)
- landscape and visual effects (section 4.7)
- social impacts (section 4.8)
- flood hazard effects (4.10)

- effects on network utilities/other infrastructure providers (section 4.17).

#### **4.16.4 Planning Assessment**

I discuss the issues raised in submissions regarding property effects, grouped by issue area.

- Compensation and property acquisition
- spatial extent of the designations
- lapse periods
- effects on specific properties
- proposed conditions

##### **4.16.4.1 Compensation and property acquisition**

While the effects of restrictions on land use and property effects of a notice of requirement and designation are RMA matters, the issues of property acquisition and compensation to land owners is a Public Works Act (PWA) matter. The Requiring Authority has proposed that a Project Information website or equivalent virtual information source be established (Proposed Condition 2 Project Information). This is intended to provide information about the status of the Project, anticipated construction timeframes, contact details for enquiries, implications of the designation, and where to obtain additional advice.

I note that section 185 of the RMA provides for an owner of land that is subject to a designation to apply to the Environment Court for an order obliging the requiring authority responsible for the designation to acquire or lease all or part of the owners land under the PWA. The provisions of section 185 of the RMA sets out matters that the Environment Court must first be satisfied as to, relating to there being an inability to sell the land and reasonable use of the land being prevented.

As discussed in section 4.8.4.3 above, the AEE identifies consultation with affected landowners has included the provision of an information pack that includes the Auckland Transport Landowner Guide.<sup>415</sup> I have read the Auckland Transport Landowner Guide and consider it provides clear general information about the property acquisition process. Therefore, I am of the opinion that the Requiring Authority has already provided information about the property acquisition process to those directly affected. The need for consultation and engagement with affected landowners and occupiers will be ongoing, and the Proposed Conditions recognise and address this need.

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<sup>415</sup> AEE, op.cit., p 31. Refers to Auckland Transport, Landowner Guide, April 2021, accessed 5 March 2023 at <https://supportinggrowth.govt.nz/assets/supporting-growth/docs/20210525-Final-Landowner-Guide-1.pdf>



A number of amendments to Proposed Condition 2 Project Information and Proposed Condition 9 SCEMP have been recommended in the set of amendments to the Proposed Conditions (**Attachment 5**). These include amendments to better ensure awareness of the project website (or equivalent), that support is provided to landowners and occupiers, and that engagement with affected landowners and occupiers and other stakeholders is relationship building and responsive to feedback.

I understand that the Requiring Authority has an Early Acquisition Policy. It would be useful for the Requiring Authority to provide more information about this Policy at the hearing.<sup>416</sup>

I consider that with the recommended amendments to the Proposed Conditions, the issues regarding property acquisition are addressed satisfactorily and to the extent that these are RMA matters.

#### **4.16.4.2 Spatial extent of the South FTN NoRs**

The Requiring Authority has determined through the Assessment of Alternatives, that the routes shown in the South FTN NoRs, are the routes which best fits its objectives. Mr Edwards, Council's consultant transport specialist, considers that the alternatives assessment is at a high level and does not appear to delve into the property by property level.

Mr Edwards has suggested, and I have agreed, that the Requiring Authority provide evidence at the hearing on options for reducing the extent of the designation and the impact on submitters' properties, including substituting retaining walls or other structures for embankments, and/ or substituting a shared path for separate walking and cycling paths at submitters properties (**Attachment 2** and refer section 4.4.3 above).

I note that the Assessment of Alternatives identifies that a process has been used to define the form and function for transport corridors and identify suitable mid-block cross sections that forms the basis for route protection for the corridor.<sup>417</sup>

The Assessment of Alternatives also identifies that a parallel process was used to identify which intersections need upgrading to address matters such as providing a more efficient and reliable bus service, safety and side road traffic volumes and function.<sup>418</sup> Roundabouts are the preferred option due to safety benefits, and signalised intersections are considered where roundabouts are not considered appropriate due to engineering constraints, bus priority implications, existing lane layouts or land use implications.<sup>419</sup>

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<sup>416</sup> Auckland Transport, Airport to Botany, Notice of Decision under s172 RMA, 21 February 2024, p3

<sup>417</sup> Assessment of Alternatives, op.cit, p19

<sup>418</sup> Ibid, p20

<sup>419</sup> Ibid

The Assessment of Alternatives says that location refinement for the alignment and footprint for each part of the South FTN considered factors such as impacts on known environmental and cultural features, values and constraints, and maintaining reasonable access to and use of adjoining properties, advantages and disadvantages of ownership (public or private) or zoning (urban or future urban), and the need for the designation boundaries to provide for the construction, operation and maintenance of the South FTN.<sup>420</sup>

The way in which the location refinement principles were used to refine the cross-section to be used for Great South Road is explained as resulting in a decision not to apply a four lane FTN arterial cross-section for the entire length of Great South Road, due to factors that include the significant third-party land requirements, as well as identification that the nature of transport demands meant a northbound bus lane only in sections of Great South Road would meet the investment objectives.<sup>421</sup> Key reasons for the preferred approach to the form and function for sections of Great South Road are stated as including avoiding property impacts or minimal third-party land requirements.<sup>422</sup>

For the Takaanini FTN (Weymouth and Alfriston Road in NoR 3 and Porchester Road in 4) route optioneering assessed various north-south and east-west route options<sup>423</sup> and criteria for the MCA scoring of the options included land requirement and land use futures, amongst other things.<sup>424</sup>

Retesting of the Alfriston Road form and function was carried out, given the considerable third-party land and property cost implications of applying the preferred four-lane FTN arterial cross-section.<sup>425</sup> The reasons for retaining the four-lane FTN on Alfriston Road, despite the third-party land requirements, were identified as transport demands of all modes on Alfriston Road, significant future predicted bus volumes, the need to replace the SH1 and NIMT overbridges irrespective of corridor width, poor transport and urban form outcomes without the additional widening, and *inability to avoid significant property impacts with compromised solutions given the nature of land use along the corridor*.<sup>426</sup>

The way in which the location refinement principles were used to refine the cross-section to be used for the Takaanini FTN includes identifying specific sites to avoid and sites with new development to minimise impacts.<sup>427</sup>

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<sup>420</sup> Ibid, p21

<sup>421</sup> Ibid, p30. Refer also Figure4-3 Great South Road FTN recommended option, p38

<sup>422</sup> Ibid, Table 4-2, p32

<sup>423</sup> Ibid, p39-56

<sup>424</sup> Ibid, p49 and p53-54

<sup>425</sup> Ibid, p57

<sup>426</sup> Ibid, p58

<sup>427</sup> Ibid, p60-61

In the case of Porchester Road, a general preference was identified to widen to the east given that land to the east of Porchester Road is zoned FUZ while land to the west is already urbanised. The Assessment of Alternatives notes that the exception to this preference was where avoidance of existing stormwater conveyance channels was sought in the vicinity of Popes Road, which resulted in a localised westward deviation (<20m) of Porchester Road at the Popes Road intersection.<sup>428</sup> The Assessment of Alternatives for the Takaanini FTN route concluded that in relation to the Weymouth and Alfriston Road sections:

*While the scale of property requirements and associated costs associated with route protection were assessed as significant (noting that over 400 properties are directly affected), the above noted benefits were considered to justify these effects and costs<sup>429</sup>*

In relation to the Porchester Road section of the Takaanini FTN route, the Assessment of Alternatives noted that the scale of property requirements and associated costs associated with route protection are moderate relative to the benefits of the project given that the majority of the corridor widening is proposed to be undertaken on the eastern side of Porchester Road which is not urbanised.<sup>430</sup>

In relation to the key connection Popes Road in NoR 4, the Assessment of Alternatives the location refinement identified the existing stormwater conveyance channel on the south side of Popes Road (east of Porchester Road) to be retained, and a desire to reduce impacts on the existing Spark Data Centre given sensitivity of communications infrastructure.<sup>431</sup> The Assessment of Alternatives notes that the scale of property requirements are moderate given that much of the area is yet to be urbanised/subdivided, and that all property requirements are partial only.<sup>432</sup>

In relation to the key connection of Great South Road Drury in NoR 2, the Assessment of Alternatives notes the need to integrate with adjoining projects to achieve an integrated, well-functioning multi-modal outcome<sup>433</sup> and the desire to avoid or reduce impacts on Hingaia Stream, where bridge replacement at a raised level to address flood hazard, is needed.<sup>434</sup> The Assessment of Alternatives notes there are partial effects on 47 directly affected properties, *which is a level of impact considered proportional to the transport benefit enabled through route protection.*<sup>435</sup>

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<sup>428</sup> Ibid, p62

<sup>429</sup> Ibid, p63

<sup>430</sup> Ibid

<sup>431</sup> Ibid, p69-70

<sup>432</sup> Ibid, p72

<sup>433</sup> Ibid, p70. Waihoehoe Road urbanisation to the north, Drury Central Station to the east, and SH1 Papakura-to-Drury (Drury Interchange) to the south

<sup>434</sup> Ibid

<sup>435</sup> Ibid, p72

I consider that the extent of property requirements has been carefully considered by the Requiring Authority. However, it does appear that the rationale for the extent of NoR on some submitter's property is not clear to the submitter. In that regard I agree with Mr Edwards that the explanations of the extent of land needed is at a reasonably high level, and I also consider that the Requiring Authority should provide comment on this matter in the hearing.

The selection of stormwater management device has addressed matters that include consideration of the scale of property impact, recognising that stormwater wetlands have the most significant land requirement.<sup>436</sup> Where possible, at-source treatment devices, such as raingardens and swales, are located within the road corridor in preference to stormwater wetlands. The location of stormwater wetlands has been chosen based on low points and sizing is based on attenuation and water quality treatment and detention needs.<sup>437</sup>

Issues regarding compliance with landscape standards of the AUP:OP or consented development becoming non-compliant with conditions as a result of the designation are raised in a number of submissions (Restaurant Brands (NoR 1-22); Z Energy (NoR 1-30), Alda Investments (NoR 4-16), D E Nakhle Investment Trust (NoR 4-17), Zabeel Investments (NoR4-15)). This is an effect that does not appear to have been addressed in the AEE and the Requiring Authority may like to address this matter in evidence at the hearing.

#### **4.16.4.3 Lapse dates**

The Requiring Authority's rationale for the extended lapse periods being sought for the South FTN NoRs is discussed above in section 2.6.4. In brief, the lapse dates sought by the Requiring Authority are stated as reflecting the Detailed Business Case (DBC) timing recommendations, the time needed to carry out detailed design, obtain consents, and obtain funding, and, for NoRs 1, 3 and 4, provide flexibility for the work to be implemented in stages.<sup>438</sup>

The concerns raised by submitters regarding the requested extended lapse date relate to property effects and social effects, including certainty and ability to use the land, being able to sell the land, and concerns about 'planning blight'.

Proposed Conditions to address the effects of extended lapse dates include Proposed Condition 2 Project Information, Proposed Condition 3 Land Use Integration, Proposed Condition 9 Stakeholder Communication and Engagement Plan, and Proposed Condition 6 Network Utility Operators section 176 approvals.

Given the range of matters to be considered in relation to the requested extended lapse date, I address this matter in detail in section 4.26 below.

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<sup>436</sup> Ibid, p24

<sup>437</sup> Ibid

<sup>438</sup> AEE, Table 8-1, p39-40.

#### **4.16.4.4 Proposed Conditions**

Attachment A to the Form 18s for the South FTN NoRs contains:

- Attachment A – Designation Plans
- Attachment B – Schedule of Directly Affected Properties
- Attachment C – Proposed Conditions for the Designation.

Proposed Condition 1 in Attachment C, which applies to the four South FTN NoRs, reads (in part):

*(a) Except as provided for in the conditions below, and subject to final design and Outline Plan(s), works within the designation shall be undertaken in general accordance with the following in Schedule 1:*

- (i) the Project Description; and*
- (ii) Concept Plans.*

Schedule 1 in Attachment C of the Form 18s for the South FTN NoRs, says that the proposed works are shown in the Concept Plans and lists the works that are purportedly shown in the Concept Plans.

However, the only information contained in the 'Concept plans' in Schedule 1 of each of the two Form 18s are plans that outline the designation boundary. The Concept Plans do not show the proposed works listed (e.g. embankments, retaining walls, culverts, stormwater management systems etc). Those works are shown on the Design Drawings in Volume 3 for the South FTN NoRs, as General Arrangement drawings.

In its section 92 request for further information (refer P4 in **Attachment 1**), Council requested further information regarding the intended purpose of proposed Condition 1 in relation to the requirement that works be undertaken in general accordance with the 'Concept Plans' in Schedule 1, when those concept plans only identify the 'Designation boundary and provide no details of the concept design (which are shown on the General Arrangement drawings).

The Requiring Authority in its s92 information response to Council (**Attachment 1**) responded that:

*The works are intended to be undertaken in general accordance with Schedule 1 which includes both the 'Project Description' and 'Concept Plan'. The concept plans included in the proposed condition set include the indicative design (monochromatic) within the designation boundaries. These have been derived from the General Arrangement Plans (supplied as Volume 3 of the lodgement package). The Project Description also covers the key components of the Project. The GA plans were only intended to illustrate an indicative design. As typical of large infrastructure projects, detailed design of the project works will be advanced via Outline Plan subject to the scope of the designation, its boundary and outcomes prescribed via conditions including management plans.*

This matter was raised in the Council's section 92 request because the Concept Plans defines only the designation boundary line and does not identify what any other lines shown may relate to. However, the concept design shown in the General Arrangement Drawings is understood to have been the basis for the AEE and the supporting technical assessments.

Council also requested in its section 92 request for further information (refer P5, **Attachment 1**) that the Requiring Authority confirm that the "project description", which Condition 1 refers to, is contained in Schedule 1 and requested identification of which part of Schedule 1 is "the project description". The term 'project description' does not appear in Schedule 1, so it is not readily apparent which part of the content is intended to be 'the project description'.

The Requiring Authority responded that the 'Project Description' refers to all of the descriptive text included in Schedule 1 before the Concept Plan(s) for each respective NoR. The description begins with "the proposed work is for the construction, operation, maintenance and upgrade of transport infrastructure..." The Requiring Authority response stated that for clarity, a 'Project Description' subheading would be added to the proposed condition set. That updated condition wording has not yet been provided.

The Requiring Authority is therefore invited to address this matter in evidence at the hearing, including by providing amendments to the Proposed Conditions to provide clarity around 'Project Description' for the South FTN NoRs.

#### Management Plans

A number of submitters have raised concerns with the use of management plans, including uncertainty as to whether potential adverse effects on property will be appropriately avoided, remedied or mitigated through management plans yet to be developed.

As discussed in section 4.2.5 above, the Proposed Conditions would require the preparation of a number of management plans and no draft management plans have been provided with the South FTN NoRs.

Proposed Condition 8 Management Plans requires management plans to be submitted as part of an Outline Plan pursuant to section 176A of the RMA, with the exception of the Stakeholder Communication and Engagement Plan and the Construction Noise and Vibration Management Plan Schedules. The set of amendments to the Proposed Conditions in **Attachment 5** includes the recommendation that the SCEMP be submitted as a part of the Outline Plan.

I consider the use of management plans appropriate, as these will be subject to Council consideration under section 176A of the RMA, which allows Council to consider whether the requirements of the Conditions have been met and to request changes be made.

#### **4.16.4.5 Conclusions**

In conclusion, I consider that it is appropriate that the Requiring Authority provides a response at the hearing on property and land use matters that include:

- the relief sought in the submissions regarding property effects;
- the recommended amendments to the Proposed Conditions (**Attachment 5**);
- the request for clarification regarding Proposed Condition 1 and Schedule 1 of the South FTN NoRs;
- the concerns raised by submitters regarding the use of management plans in the Proposed Conditions.

### **4.17 Effects on network utility and other infrastructure providers**

Section 4.5.7 of the AEE sets out the engagement during preparation of the South FTN NoRs with network utility providers. Section 10.11 of the AEE assesses the effects on network utilities and measures to avoid, remedy or mitigate potential adverse effects.

#### **4.17.1 Requiring Authority assessment**

##### **4.17.1.1 Positive effects**

Positive effects identified by the Requiring Authority are discussed in section 4.3.1 above.

##### **4.17.1.2 Effects on Network Utilities**

The Requiring Authority's assessment of the effects of the South FTN NoRs on network utility operators identifies potential effects on:

- KiwiRail Holdings Ltd – NIMT: NoR 3 intersects with the NIMT and involves replacement of the Weymouth Road bridge over the NIMT. NoR 2 is adjacent to the NIMT;
- Waka Kotahi NZ Transport Agency - SH1 designations: NoR 3 involves replacement of the Alfriston Road bridge over SH1. NoR 2 adjoins SH1 designations;
- Transpower NZ - national grid pylons and overhead lines: One pylon within NoR 3 (which Transpower intend to decommission<sup>439</sup>) and one pylon adjacent to NoR 4;
- Spark NZ Ltd - Data Centre located within NoR 4; and
- Watercare Services Ltd - Waikato No.1 Watermain adjacent to NoR 2 in Drury on the east side of Great South Road.<sup>440</sup>

Discussion of the engagement carried out during the work leading up to and including the preparation of the South FTN NoRs states that one of the objectives of that engagement has been to *integrate and collaborate with other network providers to achieve strategic co-benefits where practicable and/or not preclude future network plans.*<sup>441</sup>

Section 10.11.2 of the AEE sets out the recommended measures to avoid, remedy or mitigate effects on network utilities. These measures include Proposed Condition 6 Network Utility Operators (section 176 Approval), which provides that certain activities will not require RMA written consent under section 176(1)(b):

- operation, maintenance and urgent repair works
- minor renewal works to existing network utilities necessary for the on-going provision or security of supply of network utility operations
- minor works such as new service connections
- the upgrade and replacement of existing network utilities in the same location with the same or similar effects as the existing utility.

The Proposed Conditions also include Proposed Condition 28 Network Utility Management Plan (NUMP), which is to set out a framework for protecting, relocating and working in proximity to existing network utilities prior to the start of construction for a stage of work.

#### 4.17.2 Submissions

Submissions have been received from a number of the network utility operators.

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<sup>439</sup> Ibid, Table 4-4, p29

<sup>440</sup> Ibid, Section 10.11, p109-110

<sup>441</sup> Ibid, p21



*Watercare Services Ltd*

Watercare Services Limited (Watercare) has made submissions to each of the South FTN NoRs. The submissions seek early engagement from the Requiring Authority for future planning and construction works, including prior to detailed design and during implementation of construction works. For the submitter this includes applying for, in a timely manner, 'Works Over' Approvals, in compliance with the submitter's 'Water Supply and Wastewater Network Bylaw 2015 (Updated 2021).

In relation to NoR 1, Watercare's submission says it plans to install new wastewater infrastructure in the Ōpaheke Future Urban Zone, which will require the installation of a new wastewater rising main to convey flows from east to west. The preferred alignment is yet to be confirmed but could intersect with the proposed designation at the Otūwairoa Stream/Slippery Creek Bridge.

Watercare seeks to ensure the NoRs do not impact its wastewater and water services in the South FTN NoRs' project areas, now and into the future; that it has access 24/7 for maintenance, safety and efficient operation of its services; and that it is consulted on any works that may impact Watercare's services.

Watercare seek that a new condition be added to the Proposed Conditions for the South FTN NoRs, as follows:

*Network Utility Strategic Outcomes Plan (NUSOP):*

- (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.*
- (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.*
- (c) The NUSOP shall:*
  - (i) consider expected asset life of existing assets;*
  - (ii) consider expected asset capacity increases or changes; and*
  - (iii) Demonstrate how city and national strategic plans are considered.*
- (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.*
- (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.*
- (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.*

If the requested new NUSOP condition is not imposed, then in the alternative Watercare seek amendment to Proposed Condition 28 Network Utility Management Plan (NUMP), as follows (additions shown as underlined, deletions struck as through):

*Network Utility Management Plan (NUMP)*

- (a) A NUMP shall be prepared after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases and prior to the lodgement of an Outline Plan of Works for a stage of construction ~~Start of Construction for a Stage of Work.~~
- (b) ...
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project and shall include any s.177 consents required for works affecting prior Designations and Watercare 'Works Over Approvals'.
- ...
- (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.

*KiwiRail*

KiwiRail Holdings Ltd made submissions on NoR 2 and NoR 3, seeking that the NoRs be confirmed. In relation to NoR 2, the KiwiRail submission notes that NoR 2 abuts/overlaps slivers of the Drury Station designation. The submission notes that space proofing for the RTN needs to be considered in NoR 2.

In relation to NoR 3 the submission says allowance for future capacity upgrades of rail system should be made, and the potential to consider *if/how station can access off bridge in future design.*

The KiwiRail submission says design areas for further discussions are: *allowance for future capacity upgrades of rail system including access for construction, operation and maintenance*; and integration of bus stops, cycle ways at Great South Road near Drury Station to support mode transfer to the station.

The KiwiRail submission seeks ongoing dialogue about integration of RTN elements such as design width for cycleways, pedestrian facilities, safety and physical connections.

### *Counties Energy*

Counties Energy Ltd submission is generally supportive of the South FTN NoRs and seeks further consultation and detailed planning concerning parts of NoR 1 to address matters which may impact the location and safe operation of the assets listed in the submission.

The submitter notes that further consultation and detailed planning will be required where it is proposed to alter the ground level in the vicinity of the submitter's underground assets.

The submission states they will require confirmation that proposed earthworks comply with the requirements of NZECP34:2001 (New Zealand Code of Practice for Electrical Safe Distances); demonstration of compliance with NZECP34 will be required should the submitter's 22kV line remain overhead when the new (wider) bridge indicated in drawing 4107 is installed over Otūwairoa Stream/ Slippery Creek; and provision should be made within the bridge structures indicated in NoR 1 drawing 4107 for future undergrounding of the submitter's 22kV line.

### *Telecommunication Submitters*

A submission was received on the South FTN NoRs from a group of telecommunications providers, the "Telecommunication submitters" which takes a neutral position on the NoRs but seeks to ensure that existing and potential future telecommunications infrastructure in the project corridors are adequately addressed.

The submission by the Telecommunication submitters identifies existing infrastructure located in the Project 'footprint', which includes Connexa Facility light poles, Spark Data Centre at 23 Popes Road (within NoR 4), Spark and Chorus fibre and copper lines throughout the project area. The submission also identifies that mobile operators are progressively rolling out roadside equipment and fibre routes in Auckland roads and may be within the project corridors when works proceed.

The Telecommunication submitters seek that the extent of designation over the Spark Data Centre in NoR 4 is minimised.

The Telecommunication submitters seek that Proposed Conditions 2, 3, 16, 21 and 22 are retained.

The Telecommunication submitters seek amendment to Proposed Condition 28 NUMP to refer to further project stages including detailed design (additions shown as underlined):

- (d) *The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) during the further project stages including detailed design where practicable.*

#### 4.17.3 Specialist assessment

Mr David Russell, Council's Senior Development Engineer, has made an assessment of the network utility operator issues in the South FTN NoR and provided comment on the matters raised in the submissions by network utility operators (**Attachment 2**).

Mr Russell is of the opinion that the Proposed Conditions do not cover the period prior to the start of works very well in relation to the need for coordination and collaboration with network utility operators.<sup>442</sup>

Mr Russell agrees with the issues raised in Watercare's submission and is supportive of the additional condition requested in Watercare's submission (refer 4.17.2) and considers this would set up a process whereby all utility operators and the Requiring Authority communicate about what is happening in the Project area. Mr Russell considers that this would help minimise any impacts on the network utility operators activities to upgrade and maintain their infrastructure and minimise the need to relocate services.

Mr Russell recommends that the new condition sought in the Watercare submission for a NUSOP be included in the conditions for the South FTN NoR. The alternative relief sought by Watercare, of amendment to Proposed Condition 26 (d) NUMP is also supported by Mr Russell.

Mr Russell recommends a new clause be added to Proposed Condition 19 Construction Traffic Management Plan, as follows:

##### 19. Construction Traffic Management Plan (CTMP)

(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP shall include:

...

**(xii) Details of safe pedestrian access through the site for the neighbours to utilise. Such pedestrian access to be maintained throughout that stage of the works to allows neighbouring landowners and visitors to access the properties.**

#### 4.17.4 Planning Assessment

I rely on the expert opinion of Mr Russell in making my planning assessment and recommendations.

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<sup>442</sup> Mr David Russell, Technical Memo, para 4.4, p3

The relief sought by Watercare for the addition of a new condition for a *Network Utility Strategic Outcomes Plan* (NUSOP) would address Watercare's interest in ensuring that potential adverse effects on its ability to provide water and wastewater services now and in the future are avoided, remedied or mitigated.

I understand that the intention of the requested NUSOP condition is that it would oblige the Requiring Authority to identify not just existing network utility infrastructure, but also the expected life of those assets, how they may need to increase capacity or change, and how future planned assets would be accommodated within the Project. This is concerned with recognising that there could be future network utility infrastructure situated in or planned for the location of the Project, and that the Project may have adverse effects on the ability of network utility operators, such as Watercare, to install, operate and maintain not just existing but also future network utility infrastructure. I am of the opinion that obliging the Requiring Authority to address all of the matters in the requested NUSOP condition may go beyond addressing the effects of works undertaken for the South FTN.

The alternative relief of amendments to Proposed Condition 28 NUMP<sup>443</sup> would entail the Requiring Authority consulting with network utility operators at an early stage in the detailed design phase. However, I note that the NUMP is to be prepared at the start of construction for a stage of work, which would be at a point after the detailed design and after the Outline Plan stage. Therefore, amending Proposed Condition NUMP may not provide the opportunity that Watercare seeks for network utility operators to ensure the detailed design for the Stage of Work that the NUMP relates to has recognised existing and future network utility infrastructure.

I also note that Proposed Condition 28 NUMP requires, in clause (c), that the consultation with network utility operators is required to be with those that have *existing assets that are directly affected by the Project*. The condition does not necessitate future assets to be considered in the NUMP.

In relation to the additional clause that Watercare seeks in Proposed Condition 28 NUMP, that the NUMP shall include any section 177 of the RMA consents required for works affecting prior designations, and Watercare 'works over approvals', I am of the opinion that this addition would address a gap in the conditions. I therefore include that amendment in my recommended amendments to Proposed Conditions (**Attachment 5**).

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<sup>443</sup> Note: Attachment 5 rennumbers the Proposed Conditions as necessary to accommodate new recommended conditions, and as a consequence the conditions referred to have different numbers and should be referred to by the name of the condition and content of the condition. For ease of cross-referencing this report continues to use the numbering of conditions as they are provided in the lodged South FTN NoRs Attachment C Proposed Conditions.

To meet the relief sought in Watercare's submission regarding taking into account the matters raised by network utility operators in the detailed design and Outline Plan, I am of the opinion that a new condition would be needed, within the specific outline plan section of the conditions. I consider that the submitter and the Requiring Authority should address this matter in evidence at the hearing. At this stage I do not include the new condition NUSOP or the other amendments to Proposed Condition 28 NUMP requested by Watercare, in my recommended amendments to Proposed Conditions in **Attachment 5**. However, I consider there is merit in the issues Watercare raises regarding early recognition in the detailed design for the Project of other network utility operators assets.

In a similar vein to the matters raised in the Watercare submission, the Telecommunications Submitters are of the view that engagement and planning should be occurring at an earlier stage to better integrate the design and implementation of the corridor with their network operations. A response from the Requiring Authority should also be provided on this matter in evidence at the hearing.

While the Telecommunications Submitters note in their submission that they have been successful in having a condition where there is a specific obligation for the requiring authority to consult with network utility operators as part of the detailed design phase of other notices of requirement, their submission says they are not seeking that same outcome for the South FTN NoRs. The Telecommunication Submitters say in their submission that discussion with SGA representatives had achieved agreement for amendments to the NUMP condition for the Airport to Botany and Northwest notices of requirement, but those amendments have not been included in the South FTN NoRs Proposed Condition 28 NUMP condition.

I am of the opinion that if the concerns of the Telecommunications Submitters can be addressed by the minor amendments they seek to Proposed Condition 28 NUMP, those amendments have merit. Accordingly I have included the requested amendment to clause (d) of Proposed Condition 28 NUMP to add 'during the further project stages including detailed design' in the recommended amendments to Proposed Conditions (**Attachment 5**).

Mr Russell has recommended amendment of Proposed Condition 19 CTMP, to require the CTMP to include safe pedestrian access within areas affected by construction works.

I note that Proposed Condition 19 CTMP has the objective to avoid, remedy or mitigate as far as practicable, adverse construction traffic effects. The condition requires the CTMP to include measures to ensure the safety of all transport users, to manage vehicular and pedestrian traffic near schools, identification of detour routes for traffic flows including pedestrians and cyclists, and methods to maintain access to property.

Earlier in this report, in section 4.4.3.2 above, the amendment recommended by Mr Edwards to Proposed Condition 19 CTMP to add that the CTMP must include methods to maintain access within property (in addition to access to property) are set out. I have included that amendment in the set of recommended amendments to Proposed Conditions in **Attachment 5**. I am of the opinion that this amendment, together with the other provisions of Proposed Condition 19 CTMP already satisfactorily addresses the matter raised by Mr Russell and no further amendment is needed.

In conclusion, I consider that it is appropriate that the Requiring Authority provides a response at the hearing on matters that include:

- the relief sought in the submissions and Mr Russell's assessment of the submissions
- the recommendations and conclusions in Mr Russell's assessment and
- the recommended amendments to the Proposed Conditions (**Attachment 5**).

#### 4.18 Economic effects

The Requiring Authority's AEE has not provided a specific assessment of the economic effects of the South FTN NoRs. The AEE refers to economic effects in a number of sections including:

- in relation to the Project objective for the South FTN NoRs including improving connectivity and access to economic and social opportunities;<sup>444</sup>
- recognising social impacts on personal and property rights, include where economic livelihoods are affected;<sup>445</sup>
- assessment of the NoRs under provisions of the RPS, recognising the essential role that infrastructure has in enabling social, economic, cultural and environmental well-being.<sup>446</sup>

No economic specialist has been engaged by Council to assess the South FTN NoRs. In my opinion there are there are economic effects arising from the South FTN NoRs, which relate to:

- effects on businesses and employment, which are addressed in the Social Impacts section of this report (refer section 4.8 above).
- property effects, which have been addressed in the Property Effects section of this report section 4.16 above.

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<sup>444</sup> AEE, op.cit., p19

<sup>445</sup> Ibid, p99

<sup>446</sup> Ibid, p117

- Timing uncertainty, which is discussed also in section 2.1.3 Lapse Dates, section 4.16 and section 4.26 below.

The recommended measures to address potential business effects are focussed on communication with potentially affected parties, and future use of four management plans (CTMP, CEMP, CNVMP, SCEMP) to manage and mitigate effects on businesses.

As noted in earlier discussion in this report, the effects of the loss of parking spaces for businesses, both during construction and post-construction has not been assessed and the Requiring Authority has been asked to comment on this matter in the hearing.

In discussion of social impacts, the need for a DRMP has been identified, and this is also a matter that the Requiring Authority has been asked to comment on at the hearing.

At this stage, no further recommended amendments to the Proposed Conditions have been included in **Attachment 5** in relation to economic effects.

#### **4.19 Effects Assessment Conclusion**

There are a number of matters identified in this report where the Requiring Authority has been asked to provide more information and clarification. Therefore, my conclusions and recommendations, at this stage, are provisional only in relation to the effects of the South FTN NoRs, and are subject to any modifications of the South FTN NoRs that may arise from the Hearing.

##### Transport and Traffic Effects

Issues have been raised regarding the extent to which the positive transport effects of the South FTN NoRs might now be considered as 'over-stated', given the changes made in the adopted FDS for the timing and extent of urbanisation in Takaanini and Drury- Ōpaheke. Issues have also been raised regarding the safety of proposed cycle ways. The Requiring Authority has been asked to address these matters in the hearing.

Additional conditions have been recommended to address the adverse transport effects of potential closures of the four bridges within the South FTN NoRs during demolition and construction works. The Requiring Authority has been asked to make comment on this matter, including in relation to potential noise and vibration and lighting effects arising from night time work during demolition and construction of the bridges.



While removal of on-street parking may be in line with current policies (Room to Move Strategy) the effects of the removal of on-street have not been assessed by the Requiring Authority. This includes in relation to the on-street carparking outside Papakura Normal Primary School within NoR 4. A number of submissions raise concerns regarding the loss of car parks on-site, and in a similar manner, the effects have not been assessed. The Requiring Authority has been asked to address this matter.

#### Noise and Vibration

The Proposed Conditions do not always appear to reflect the recognition stated in the AEE that assessing the effects on the environment as it exists today will not provide an accurate reflection of the environment in which the effects of the construction and operation of the South FTN NoRs will be experienced. This is the case in relation to operational noise conditions that seek to 'freeze' the receiving environment to what it was at the time of assessments prepared in 2023.

The Requiring Authority has been asked to address whether there are gaps in the identification of PPFs in Schedule 4, including residential activities that have been consented but not yet built. Furthermore, in order to ensure that adverse operational traffic noise is avoided or mitigated the Requiring Authority has been asked to consider how the noise contours might be made widely available and to respond to the recommended amendment to traffic noise conditions to include an assessment of noise receivers as exist at the time of construction.

#### Landscape and visual and Urban Design effects

Council's urban design and landscape and visual specialists have both recommended amendment to Proposed Condition 12 UDLMP so that this plan is prepared prior to the detailed design rather than as proposed, just prior to the start of construction of a Stage of Work. I have recommended this amendment, as I agree that in order to ensure integration of the Project in the urban context, the UDLMP should be prepared at an early stage. The Requiring Authority may wish to respond on this matter.

#### Social Effects – Economic Effects

While there will be positive social effects at the operational stage of the Project, including greater transport choice, and improved connectivity and accessibility, it is apparent from the submissions that there are adverse social effects arising from the notice of requirement process itself, and that other adverse social impact may arise during the construction of the Project. The positive effects identified by the Requiring Authority of opportunities for local employment during construction as a construction/temporary effect do not appear to be reflected in the Proposed Conditions.

Amendments to the Proposed Conditions have been recommended to ensure the potential adverse social impacts are avoided, remedied or mitigated, and to better ensure the identified positive social impacts are achieved. The Requiring Authority has been asked to respond to those proposed amendments and to clarify its approach to social impacts and consultation and engagement for the South FTN NoRs compared to other projects.

#### Open Space

The Requiring Authority has been asked to clarify and comment on a number of matters in relation to open space, including the potential for a condition similar to that in Proposed Condition 6 for network utility operators, to provide exceptions for the need for section 176 approvals for any urgent issues that Council needs to attend to in operating and maintaining open space services and amenities.

There are also some questions about the potential effects on a number of open spaces, including the loss of connection between the War Memorial and adjacent parkland at the Central Park Cenotaph, and the potential for undesirable modifications to the distinctive mound at Chisholm Corner; and potential permanent effects on Gallaher Park and Alfriston Park. These are matters that the Requiring Authority has been asked to address in the hearing.

#### Flooding

Relying on the expert opinions of Mr Sunich I have recommended amendments to the Proposed Conditions relating to flood hazard. The Requiring Authority may wish to comment on those recommended amendments.

#### Historic Heritage

In respect of trees with potential or actual heritage values, Council's specialist heritage arborist, Mr Fynn has identified that there may have been no or inadequate identification and assessment of the heritage values of trees. The Requiring Authority has been asked to respond to this matter at the hearing.

#### Ecological Effects

The Proposed Conditions relating to ecological effects do not appear to reflect the recognition expressed in the AEE that the receiving environment will have changed by the time construction is carried out. In particular, the ecological conditions seek to 'freeze' the receiving environment to what it was at the time of assessments prepared in 2023.

The Proposed Conditions in relation to indigenous fauna are considered to not adequately ensure that potential adverse effects are avoided, remedied or mitigated. Replacement of the lizard survey and lizard management plan conditions with more broadly focused indigenous fauna survey and Ecological Management Plan has been recommended.

Questions have arisen regarding the Requiring Authority's identification of positive effects of landscape planting adjacent to stream and riparian corridors and improving connectivity for freshwater species in the Papakura Stream, Otūwairoa stream/Slippery Creek and Hingaia Stream, given that those matters have also been stated as being subject to the regional consenting requirements.

These are matters that the Requiring Authority may wish to respond to at the hearing.

#### Property Effects

Effects on both residential and commercial properties arise from uncertainties due to the extent of the designation, the extended lapse period, and the timing and length of the construction of the works provided for by the South FTN NoRs. This is reflected in the concerns raised in submissions.<sup>447</sup>

Mr Edwards has suggested, and I agree, that the Requiring Authority should provide evidence at the hearing on options for reducing the extent of the designation and the impact on submitters' properties, including substituting retaining walls or other structures for embankments, and/or substituting a shared path for separate walking and cycling paths at submitters properties.

Concerns have been raised by a number of submitters regarding the reliance on management plans in the Proposed Conditions to avoid, remedy or mitigate adverse effects. I am of the opinion that the conditions as recommended to be amended in **Attachment 5** provide clear objectives and requirements for the management plans to meet.

I also consider that provision of the management plans with the Outline Plan required under section 176A enables Council to determine whether the requirements of the relevant conditions have been met. I have noted that this may be a matter that the Requiring Authority wishes to address in evidence at the hearing.

#### Effects on Network Utilities

Submitters have requested new or amended conditions to better address early engagement with network utility operators in relation to existing and planned network utility infrastructure. This is a matter that the Requiring Authority has been asked to respond to in the hearing.

#### Cumulative Effects

The South FTN NoRs overlap and abut the Takaanini Level Crossings NoRs in some locations, and the potential cumulative effects of the two NoRs has not been addressed in the AEE and supporting assessments for the South FTN NoRs.

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<sup>447</sup> Property values, business loss/viability, development, reinstatement, consultation / engagement, compensation, and acquisition.

## Conclusion

My provisional conclusion is that subject to the recommended amendments to the Proposed Conditions (**Attachment 5**) and subject to the issues the Requiring Authority has been asked to comment on being satisfactorily resolved, the adverse effects on the environment of allowing the South FTN NoRs can be appropriately avoided, remedied or mitigated.

### **4.20 National policy statements**

Section 171(1)(a)(i) of the RMA requires when considering a notice of requiring and any submissions received, a territorial authority must, subject to Part 2, consider the effects on the environment of allowing the notice of requirement, having particular regard to any relevant provisions of a national policy statement.

#### **4.20.1 National Policy Statement on Urban Development 2020**

The National Policy Statement on Urban Development 2020 (NPS-UD) has the primary objective of ensuring that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.<sup>448</sup> This also includes, among other things, improving housing affordability by supporting competitive land and development markets and ensuring that urban environments are integrated with infrastructure planning and funding decisions.<sup>449</sup>

The NPS-UD also requires that local authorities must be satisfied that additional infrastructure to service the development capacity is provided and likely to be available in addition to being resilient to the current and future effects of climate change.<sup>450</sup>

The Requiring Authority has assessed the South FTN NoRs against the relevant provisions of the NPS-UD in Section 11 of the AEE. In summary, the Requiring Authority finds that the Project will give effect to the NPS-UD because:

- The Project responds to and addresses deficiencies in the existing arterial roading network between Manukau and Drury;
- The Project directly responds to policy directives seeking to promote greater accessibility and mobility by public transport, walking, and cycling; and contributes to mode shift, greater travel choice, and reductions in transport emissions;

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<sup>448</sup> NPS-UD Objective 1

<sup>449</sup> Ibid, Objective 6

<sup>450</sup> Ibid, Section 2.2 Page 10

- The NPS-UD provides that urban environments, including amenity values develop and change over time, and the adverse effects of infrastructure must be assessed in the context of the wider need for and the benefits of the proposed infrastructure. A comprehensive suite of conditions will manage construction disruption and associated amenity impacts,<sup>451</sup>
- The design and assessment parameters adopted for the Project have appropriately accounted for natural hazards and considered the effects of climate change.<sup>452</sup>

I concur with these conclusions and consider that the South FTN NoRs will support and enable future growth proposed in South Auckland while also promoting and providing for active modes of transport and significant public transport availability. In that regard, I agree that the South FTN NoRs give effect to the NPS-UD. In addition, I consider that the Proposed Conditions, as recommended to be amended (**Attachment 5**), will give effect to the NPS-UD.

#### 4.20.2 National Policy Statement on Freshwater Management 2020

The National Policy Statement on Freshwater Management 2020 (NPS-FM) endeavours to implement Te Mana o te Wai<sup>453</sup> by prioritising first the health and well-being of water bodies and freshwater ecosystems followed by the health needs of people and then the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

As noted above, under section 171 of the RMA, a notice of requirement must, subject to Part 2, be considered having particular regard to any relevant provisions of a national policy statement.

In the context of route selection and protection under the South FTN NoRs, the Requiring Authority has assessed the Project against the relevant provisions of the NPS-FM in Section 11 of the AEE. In summary, the Requiring Authority finds that the Project will give effect to the NPS-FM because:

- Through optioneering and design, the Project has sought to avoid direct physical effects on freshwater bodies including streams and wetlands, particularly where the Project traverses streams – notably Otūwairoa Stream / Slippery Creek (within NoR 1), the Hingaia Stream (within NoR 2), and the Papakura Stream (near NoR 4).<sup>454</sup>

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<sup>451</sup> AEE, op.cit, p120

<sup>452</sup> AEE, op.cit., p125

<sup>453</sup> A concept that seeks to recognise and protect the health of freshwater in order to protect the health and well-being of the wider environment

<sup>454</sup> AEE, p122

- While the concept design generally avoids streamworks, the Assessment of Ecological Effects has identified a number of small-scale construction impacts on natural inland wetlands. Authorisations for streamworks and works within wetlands are outside the scope of the South FTN NoRs, and are therefore to be addressed in future regional and NES consenting processes. Notwithstanding this, a functional need for the location and extent of the proposed infrastructure has been established, and sufficient space has been allowed for within the NoR boundaries to allow for flexibility in future design responses including options for localised avoidance of effects, offset, or compensation.<sup>455</sup>

I note that the coalition Government has announced an intention to revise the NPS-FM 2020. This process is expected to take 18 to 24 months (i.e. to around the end of 2025). The s171 obligation relates to 'a national policy statement' only and does not include a proposed NPS. If the government releases a draft NPS for feedback in the next few months, there is no legislative requirement to have regard to it.<sup>456</sup>

The RMA s80A requirement to develop a Freshwater Planning Instrument to implement the NPS-FM has been amended to change the notification deadline from 31 December 2024 to 31 December 2027. The Council is currently reviewing its NPS-FM programme in response to these changes. It has not yet been determined when a plan change will be notified. However, Council staff anticipate that it will be after the revised NPS-FM is finalised.

I concur with the assessment provided in the AEE under the NPS-FM and Council's ecology specialists also agree with the management approach (subject to minor additional and amendments). In that regard, I agree that the South FTN NoRs give effect to the NPS-FM, subject to the conditions, as recommended to be amended.

#### **4.20.3 National Policy Statement for Indigenous Biodiversity**

The National Policy Statement for Indigenous Biodiversity (NPS-IB) provides direction to councils to protect, maintain and restore indigenous biodiversity, requiring at least no further reduction nationally.

The relevant provisions of the NPS-IB are assessed in Theme 3 Ecology and Natural Heritage in section 11 of the AEE. In summary, the Requiring Authority finds that the Project will give effect to the NPS-IB because:

- The Project has avoided any effects on SEAs, noting that the 109m<sup>2</sup> extent of the Kirks Bush SEA (SEA\_T\_5248) is already entirely within the road reserve and corresponds with a location in which the canopies of mature trees already overhang the road. No further road widening is proposed into the SEA extent, so there is no effect.

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<sup>455</sup> Ibid

<sup>456</sup> Refer: <https://www.beehive.govt.nz/release/government-takes-first-steps-towards-pragmatic-and-sensible-freshwater-rules>

- The Assessment of Ecological Effects has not identified any further SNAs within the Project area. Notwithstanding this, the assessment has identified that the loss of vegetation required for the Project will result in loss lizard habitat within NoRs 1, 2, and 3. Consequently, a Tree Management Plan (TMP) and Lizard Management Plan (LMP) are offered as conditions providing for the mitigation of these effects.
- The extents of NoRs 1 and 3 contain or pass near nine notable trees or notable groups of trees. The concept design avoids the need to remove these trees, with impacts limited at worst to limited works within the root zone. While effects on notable trees are thus largely avoided, the Project does impact trees protected under the District Plan E17 provisions – 51 individual trees, and 42 groups of trees. A Tree Management Plan (TMP) is offered as a condition to secure a process at the Outline Plan stage to confirm how any effects on these trees will be managed.<sup>457</sup>

Overall I agree that the South FTN NoRs will give effect to the NPS-IB, subject to the Proposed Conditions and subject to those conditions being amended as recommended in this report (**Attachment 5**).

#### **4.20.4 National Policy Statement on Electricity Transmission**

The National Policy Statement on Electricity Transmission (NPSET) endeavours to recognise and provide for the significance of the electricity transmission network, by facilitating the operation, maintenance and upgrade of the network whilst managing adverse effects of the network and managing adverse effects of other activities on the network.

The Requiring Authority has assessed the Project against the NPSET in section 11 of the AEE. That assessment finds that:

- The National Grid Corridor Overlay traverses NoR 2, NoR 3, and two locations within NoR 4. Of these areas, single Transpower pylons sit within the proposed designation extent north of Alfriston Road and east of SH1 (within NoR 3), and at the intersection of Porchester and Airfield Roads (within NoR 4). Overhead lines traverse the road in the remaining locations;
- The Project has no direct physical impact on the pylons within NoRs 3 and 4 – the concept design shown in the General Arrangement Plans show that impacts can be avoided within NoR 3 by retaining the SH1 bridge batter slope, and in NoR 4 by orienting the intersection of Porchester and Airfield Roads slightly eastwards;

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<sup>457</sup> AE, op.cit, p122-123

- Given the rigorous approach to concept design and optioneering, the Project's direct impact on the overlay is minimal. The South FTN NoRs apply to small areas, and the activities provided for by the NoRs do not fall within the definition of activities sensitive to the national grid. No impacts on national grid infrastructure are anticipated;
- Notwithstanding this, a NUMP is offered as a condition to secure a process at the Outline Plan stage to confirm how any effects on utilities including the national grid may be managed.<sup>458</sup>

I concur with this assessment under the NPSET and Council's development engineer specialist also agrees with the management approach (subject to minor additional and amendments). In that regard, I agree that the South FTN NoRs give effect to the NPSET, subject to the conditions, as recommended to be amended (**Attachment 5**).

#### 4.20.5 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement (NZCPS) contains objectives and policies relating to the coastal environment.

Theme 7 in Section 11 of the AEE assesses the NoRs in relation to the NZCPS. That assessment finds that:

- The Assessment of Ecological Effects notes that while no part of the Project is within the Coastal Marine Area (CMA), the intertidal zone extends beyond the CMA, and that impacts on tidal estuaries, coastal vegetation, and habitats of indigenous coastal species may still be relevant. Accordingly, the Assessment of Ecological Effects, and alternatives assessment, considered the construction and operational effects of the Project on coastal wetland vegetation and habitats of indigenous coastal species. The overall level of effects was assessed as negligible for all effects assessed.
- Regional consenting matters such as impacts on coastal wetlands have not been formally addressed at this stage. However, measures have been taken to avoid these features where possible, and to ensure that any future requirements to remedy or mitigate potential impacts are practical and achievable.<sup>459</sup>

Overall, I consider that the South FTN NoRs give effect to the NZCPS subject to the Proposed Conditions, as recommended to be amended in this report (**Attachment 5**).

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<sup>458</sup> Ibid, p119-120

<sup>459</sup> Ibid, p126



#### 4.20.6 National Policy Statement on Highly Production Land

The National Policy Statement on Highly Productive Land (NPS-HPL) came into effects on 17 October 2022 and has the broad objective that:

##### 2.1 Objective

*Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations.*

Highly productive land is defined in the NPS-HPL as:

*'... land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land).'*

As no mapping of highly productive land has occurred as yet the definition falls under section 3.5(7) which states:

- (7) *Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that, at the commencement date:*
- (a) *is*
    - (i) *zoned general rural or rural production; and*
    - (ii) *LUC 1, 2, or 3 land; but*
  - (b) *is not:*
    - (i) *identified for future urban development; or*
    - (ii) *subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.*

The land subject to the South FTN NoRs does not fall within the definition of Highly Productive Land, as the land is not zoned general rural or rural production and is either zoned an urban zone or is FUZ. Therefore the NPS-HPL is not relevant to the South FTN NoRs.

#### 4.21 Regional Policy Statement (Chapter B of the AUP) (RPS)

The RPS sets the strategic direction for managing the use and development of natural and physical resources throughout Auckland. The following sections of the RPS are considered relevant to the South FTN NoRs:

- Chapter B2 Tāhuhu whakaruruhau-ā-taone – Urban Growth and Form

- Chapter B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao – Infrastructure, transport and energy
- Chapter B4 Te tiaki taonga tuku iho – Natural heritage
- Chapter B5 Ngā rawa tuku iho me te āhua – Historic heritage and special character
- Chapter B6 Mana Whenua
- Chapter B7 Toitū te whenua, toitū te taiao – Natural resources
- Chapter B10 Ngā tūpono ki te taiao – Environmental risk

The Requiring Authority has assessed the Project against the relevant provisions of the RPS in Section 11 and Table 11-2 of the AEE, with the exception of B4.5 Notable Trees. Table 19 below shows the RPS chapters in the AUP and the section of Table 11-2 of the AEE in which the RPS is addressed.

**Table 19: AUP RPS Chapter and Table 11-2 AEE sections**

RPS Chapter	Section of AEE Table 11-2
Chapter B2	Theme 2 – Urban Growth and urban form
Chapter B3	Theme 1 - Enabling infrastructure while managing its adverse effects
	Subtheme 1a – Enabling infrastructure (National Grid)
Chapter B5	Theme 4 - Historic Heritage
Chapter B6	Theme 5 - Manawhenua
Chapter B7	Theme 3 – Ecology and Natural Heritage
Chapter B10	Theme 6 - Natural hazards / flooding

Table 11-2 in the AEE does not specifically refer to assessment of the South FTN NoRs in relation to Chapter B4 Natural Heritage, or B4.5 Notable Trees. Particularly relevant in B4.5 are Objective B4.5.1 that notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained, and Policy B4.5.2(4) *Avoid development that would destroy or significantly adversely affect the identified values of a notable tree or group of trees unless those effects are otherwise appropriately remedied or mitigated.*

I note that Table 11-1 of the AEE does identify Chapter B4 is a relevant provision for the assessment of the Project.<sup>460</sup> As noted above the Requiring Authority's assessment of the NPS-IB under Theme 3 – Ecology and Natural Heritage, identifies that effects on notable trees are avoided. I therefore consider the assessment demonstrates that the Project will give effect to Chapter B4 of the RPS.

I generally agree with the Requiring Authority's assessment under the RPS provisions, subject to the changes recommended to Proposed Conditions and the content and implementation of the management plans and processes proposed as part of the South FTN NoRs.

## **4.22 Auckland Unitary Plan district plan provisions**

### **4.22.1 Auckland Unitary Plan**

The AUP:OP district plan provisions are addressed in section 11 and Table 11-2 of the AEE (along with the RPS provisions discussed above).

#### **4.22.1.1 Auckland Unitary Plan - Chapter D overlays**

Chapter D provisions are addressed in section 11 and Table 11-2 of the AEE. Table 11-2 identifies the overlays in the AUP:OP that are relevant to consideration of the NoRs:

- D1: High Use Aquifer Management Areas Overlay [rp]
- D9: Significant Ecological Areas Overlay [rcp/rp/dp]
- D13: Notable Trees Overlay [dp]
- D17: Historic Heritage
- D26: National Grid Overlay [dp].

The provisions of Chapter D1 are regional provisions. Therefore, an assessment of these will be required at the regional resource consent stage.

Without repeating the detail of the assessment in the AEE, the Requiring Authority concludes that the South FTN NoR is consistent within the overlay provisions.

I concur with the assessment of the Requiring Authority and have no further comments to add.

#### **4.22.1.2 Auckland Unitary Plan - Chapter E Auckland-wide**

The relevant Auckland wide chapters are addressed by the requiring authority in Table 11-2. Without repeating the detail of this assessment, it is considered that relevant Chapter E chapters are:

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<sup>460</sup> Ibid, p116

- E12 Land disturbance – District
- E15 Vegetation management and biodiversity
- E17 Trees in roads
- E25 Noise and vibration
- E26 Infrastructure
- E27 Transport
- E36 Natural hazards and flooding.

Table 11-1 of the AEE does not identify the following AUP:OP provisions to be relevant to the South FTN NoR:

- E1 Water quality and integrated management
- E2 Water quantity, allocation and use
- E3 Lakes, rivers, streams and wetlands
- E8 Stormwater - Discharge and diversion
- E10 Stormwater management area - Flow 1 and Flow 2
- E16 Trees in open space zones
- E18 Natural character of the coastal environment
- E24 Lighting

I note that while Table 11-1 does not list E1 as being relevant to the assessment, Table 11-2 does provide an assessment of the Project in relation to E1 under Theme 3 – Ecology and Natural Heritage.<sup>461</sup>

Otherwise, it is not entirely apparent why the provisions I have identified are not considered relevant by the Requiring Authority and are not assessed. This is a matter that the Requiring Authority may wish to address in evidence at the hearing. With that qualification, I otherwise agree with the assessment provided by the Requiring Authority in section 11 and Table 11-2 of the AEE on these matters.

#### **4.22.1.3 Auckland Unitary Plan – Chapter H Zones and Chapter I Precincts**

Table 11-1 of the AEE does not identify any Chapter H provisions of the AUP:OP as being relevant to the consideration of the South FTN NoR and Table 11-2 of the AEE does not assess the NoRs against any of the Chapter H provisions. The reasons for this are not apparent, and the Requiring Authority may wish to address this matter in evidence at the hearing.

I note that Section 9 of the AEE identifies the current zoning of land within and surrounding the South FTN NoR. Based on that list the zones that may be relevant for assessment of the NoRs include:

- H3 Residential – Single House Zone
- H4 Residential – Mixed Housing Suburban Zone

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<sup>461</sup> Ibid, p122

- H5: Residential – Mixed Housing Urban Zone
- H6: Residential – Terrace Housing and Apartment Building Zone
- H7: Open Space Zones
- H10: Business – Town Centre Zone
- H11: Business – Local Centre Zone
- H12: Business – Neighbourhood Centre Zone
- H13: Business – Mixed Use Zone
- H16 – Heavy Industry Zone
- H17: Business – Light Industry Zone
- H18: Future Urban Zone

These chapters of the AUP:OP provide descriptions of the zones, objectives and policies and activity tables, which, amongst other things, identify those land uses that may establish as permitted activities. These chapters, therefore, would appear to be important as a part of the policy framework, for the Requiring Authority's assessment of the receiving environment.

Table 11-1 identifies Chapter I – Precincts relevant to the assessment of the NoRs as:

I438 – Takanini Precinct

I445 – Gatland and Great South Road Precinct

I446 – Gatland Road Precinct

I450 – Drury Centre Precinct

I concur with the Requiring Authority's assessment provided in section 29 and Table 29-1 of the AEE of the above provisions of Chapters I.

#### **4.22.2 Council-Initiated Proposed Plan Changes to the Auckland Unitary Plan**

The AEE identifies Proposed Plan Change 78: Intensification (PC78) in its assessment of the South FTN NoR. PC78 responds to the NPS-UD and Intensification Planning Instrument (IPI) requirements of the Resource Management Act.

Other Council-initiated plan changes, which relate to the IPI and also give effect to the NPS-UD, are relevant to the consideration of the NoRs and include:

- PC79: Amendments to the transport provisions. PC79 aims to manage impacts of development on Auckland's transport network, with a focus on pedestrian safety, accessible car parking, loading and heavy vehicle management, and catering for EV-charging and cycle parking.

- PC80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters. PC 80 integrates the concepts and terms, well-functioning urban environment, urban resilience to the effects of climate change and qualifying matters, into the objectives and policies in several chapters of the Regional Policy Statement (RPS).

#### 4.22.3 Conclusions

I generally concur with SGA's assessment of the Project against the AUP:OP district plan provisions. However, I note the gap in the assessment of Chapter H zone provisions may need consideration, particularly in relation to the future receiving environment.

Subject to the matters I have referred to being satisfactorily addressed, I consider that the South FTN NoRs are generally consistent with the AUP:OP district plan provisions, subject to the changes recommended to Proposed Conditions (**Attachment 5**).

#### 4.23 Alternative sites, routes or methods – section 171(1)(b)

The Requiring Authority does not have an interest in all the land and the effects of the works are likely to be significant. Therefore, an assessment of alternative sites, routes or methods is required.

The Requiring Authority's Assessment of Alternatives is set out in Appendix A to the AEE. Figure 1-4 of Appendix A outlines the process undertaken through the corridor and route refinement assessment of alternatives. Section 7 of the Assessment of Alternatives specifically addresses section 171(1)(b) of the RMA, and discusses options considered included designations, resource consents, structure plans and plan changes to require road frontage setbacks, landowner / developer negotiation, and property acquisition.<sup>462</sup>

Based on guidance from caselaw, I understand that the issue is whether a requiring authority has adequately considered alternatives, and not whether the 'best' option has been chosen, or that all possible alternatives have been considered.<sup>463</sup> Therefore, the option chosen by the requiring authority is the one that it considers meets the objectives of the requiring authority and the proposed project or work. However, the requiring authority does need to ensure that it has considered all reasonable options and has not 'acted arbitrarily or given cursory consideration to the alternatives'.<sup>464</sup>

In my opinion, the information supplied in the Assessment of Alternatives demonstrates that the Requiring Authority has satisfied the requirements of section 171(1)(b), in that adequate consideration has been given to alternative sites, routes, or methods of undertaking the work.

<sup>462</sup> Assessment of Alternatives, op. cit., p74-76

<sup>463</sup> Beda Family Trust v Transit NZ (A129/2004) at [57]

<sup>464</sup> Waimairi District Council v Christchurch City Council C30/1982

#### 4.24 Reasonable necessity for work and designation

The Requiring Authority has set out its specific project objectives in the Form 18 documents and in section 3.3 of the AEE and provides an assessment under section 171(1)(c) of reasonable necessity in section 7 of the AEE.

The Project objective for the South FTN NoRs is stated as being:

*Provide for upgraded multi-modal transport corridors between Manukau and Drury that:*

- a) Improve connectivity and access to economic and social opportunities;*
- b) Improve safety;*
- c) Improve efficiency, resilience, and reliability;*
- d) Integrate with and support existing development and planned urban growth;*
- e) Integrate with and support the existing and future transport network; and*
- f) Improve travel choice and contribute to mode share shift.<sup>465</sup>*

The AEE concludes that the designations are reasonably necessary to achieve the project objectives. The Assessment of Alternatives identifies that:

*The National Policy Statement on Urban Development (NPS-UD) and the Medium Density Residential Standards (MDRS) (legislated through the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 set clear direction for councils to enable increased housing supply in high-growth areas. Auckland Council's response came in the form of Plan Change 78 (PC78) which was notified in August 2022.*

*These changes signal that growth in South Auckland will continue to be provided for, which in turn will result in travel demands necessitating multi-modal transport improvements such as the South FTN<sup>466</sup>*

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<sup>465</sup> AEE, op.cit., section 3.3, p19

<sup>466</sup> Assessment of Alternatives, p13

The Assessment of Alternatives notes a number of private plan changes in the wider project area that have become operative.<sup>467</sup> Together, these Plan Changes *signal that growth in South FTN project area is continuing to be planned and provided for, which in turn will result in travel demands necessitating multi-modal transport improvements such as the South FTN.*<sup>468</sup>

As discussed in section 4.4 Council's consultant transport and traffic specialist, Mr Edwards raises reservations about the necessity of parts of the Project, particularly NoR 4. As previously noted earlier in this report, the Assessment of Alternatives says that: *A small proportion of this increased demand in the very long term may be reduced if the removal of the Takaanini Future Urban Zone (FUZ) is confirmed as a result of Auckland Council's Future Development Strategy (FDS)*<sup>469</sup>The Requiring Authority has been asked to provide more detail on this matter in the hearing.

As noted in section 4.3.4 above, I consider it would be useful for the Requiring Authority to provide more details around how the impacts of the changes made in FDS to the timing and FUA status of Takaanini and Ōpaheke have been addressed in the ATE and AEE, addressing the 'reasonable need' (and lapse period matters) that are discussed in this report.

I note that at the time of writing this report, the Government has released a Cabinet Paper that identifies the Government policy of requiring Tier 1 and 2 Councils to make 30 years-worth of land for housing available immediately, making the MDRS rules optional, options for refining the NPS-UD relating to mixed-use zoning as well as other changes.<sup>470</sup> While the policy framework is in a state of flux, and it is the existing higher order planning directives that the South FTN NoRs must be considered against, it is clear that the policy direction is for enabling growth and intensification. In that regard, I agree with the Requiring Authority that legislative and policy direction to enable

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<sup>467</sup> Plan Change 52 at 520 & 522 Great South Road, Opāheke became operative in December 2021; Plan Change 58 at 470 & 476 Great South Road, Opāheke became operative in March 2022. Plan Change 67 that upzoned parts of the Hingaia Peninsula became operative in August 2022; Plan Change 48 rezoned Drury centre precinct from FUZ to Business metropolitan and other zonings became operative in December 2022. Plan Change 49 rezoned 184ha of FUZ in the Drury East precinct to Business, Residential zonings and became operative in December 2022. Plan Change 50 that rezoned 49ha located to the north of Waihoehoe Road and east of the NIMT from FUZ to Residential became operative in December 2022. Plan Change 51 that rezoned land in Drury West from FUZ to Business: Town Centre and Residential became operative in December 2022. Plan Change 61 in the Drury West area rezoned 56ha from FUZ to Residential and Business: Neighbourhood Centre became operative in December 2022.

<sup>468</sup> Ibid

<sup>469</sup> Ibid, p39

<sup>470</sup> Office of the Minister of Housing, Infrastructure and RMA Reform, Fixing the Housing Crisis, Cabinet Paper accessed at [Cabinet-Paper-Fixing-the-Housing-Crisis.pdf \(hud.govt.nz\)](https://www.hud.govt.nz/cabinet-paper-fixing-the-housing-crisis.pdf) on 1 March 2024. The Cabinet Paper also signals the intention to reform the resource management system to a property rights based system, providing councils with new funding and finance tools for infrastructure, an intention to develop rules for greenfield infrastructure, an intention to address funding of transport to facilitate more housing, and an intention to address ways other than the designation process under the RMA for land to be protected for infrastructure in a way that will lower costs.



increased housing supply will place increased demand on the transport network.<sup>471</sup>

My preliminary opinion, formed without the benefit of having heard from submitters or the Requiring Authority's response to the issues raised, is that overall the South FTN NoRs are reasonably necessary to achieve the objectives of the Requiring Authority.

#### **4.25 Any other matter – section 171(1)(d)**

Section 171(1)(d) requires the Council to have particular regard to any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement. In this case the non-RMA documents are considered relevant.

The Requiring Authority states, in Section 11.2.2 of the AEE, that it considers that there are other matters under s171(1)(d) that particular regard should be had to in considering the South FTN NoRs. The Requiring Authority has provided an assessment against a range of other legislation, central government and local government plans, strategies and policies in Table 11-3 of the AEE.

I note that the assessment of the Council's FDS in section 11.2 of the AEE identifies that regard was given to the draft FDS in relation to the Takaanini FUZ was taken into account and resulted in upgrade of Popes Road East not being included in NoR 4. However, the assessment in 11.2 of the AEE also notes that the consultation draft FDS was not considered in the alternatives assessment, as that assessment pre-dated publication of the consultation draft FDS. Further, as discussed in section 4.3.3 above in relation to the Requiring Authority's assessment of the positive traffic and transport effects of the NoRs, it is unclear to what extent the Requiring Authority's ATE had regard to either the consultation draft FDS (adopted 4 May 2023) or final FDS (adopted 2 November 2023). This is a matter that has been recommended for the Requiring Authority to address in evidence on at the hearing.

I also note that the other matters addressed in section 11 of the AEE include the Government Policy Statement of Land Transport 2021/22 – 2030/31, and that a draft GPS on Land Transport 2024/25 – 2033/34 was released by the Government on 6 March 2024.<sup>472</sup>

That document is a draft that is open for public submissions and is expected to be finalised by July 2024 and is not yet Government policy, and therefore has limited relevance to the consideration of the South FTN NoRs at this time.

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<sup>471</sup> Assessment of Alternatives, op.cit., p39

<sup>472</sup> Ministry of Transport, Government Policy Statement on Land Transport 2024, <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/government-policy-statement-on-land-transport-2024/>, accessed 8 March 2024

I note that Mill Road is identified in the draft GPS on Land Transport as a road of national significance. Roads of national significance are stated as intended to be four-laned, grade-separated highways and all funding and financing and delivery options should be considered to deliver them in stages and as quickly as possible.<sup>473</sup> This is a matter that may be of relevance to the consideration of the recommended amendments to Proposed Conditions for NoR 1 to address the effects of the closure of the Otūwairoa Stream /Slippery Creek Bridge during construction.

I generally concur with the assessments and conclusions of the AEE on any other matter and the range of other documents listed in section 11.2 of the AEE.

#### 4.26 Designation lapse period extension

Section 184 of the RMA states that designations lapse within five years, if not given effect to, or an extension has been obtained under section 184(1)(b), or the designation provides for a different lapse period under section 184(1)(c).

The Requiring Authority has requested a 15-year lapse period for NoRs 1, 3 and 4, and a 10-year lapse period for NoR 2.

Section 184 of the RMA gives discretion to alter the lapse period for a designation from the default 5 years. The Environment Court decision in *Beda Family Trust v Transit NZ* A139/04 makes the following statement on the exercise of that discretion in considering a longer lapse period:

*The decision has to be exercised in a principled manner, after considering all of the circumstances of the particular case. There may be circumstances where a longer period than the statutory 5 years is required to secure the route for a major roading project. Such circumstances need to be balanced against the prejudicial effects to directly affected property owners who are required to endure the blighting effects on their properties for an indeterminate period. The exercise of the discretion needs to be underlain by fairness.*

Environment Court decisions on disputed designation lapse periods are noted in Table 20 below for reference purposes.

**Table 20** Lapse periods noted in Environment Court decisions on designations

Case	Requiring authority requested lapse period	Court decision lapse period
Beda Family Trust v Transit NZ	20 years	10 years

<sup>473</sup> Ministry of Transport, Government Policy Statement on Land Transport 2024, p11 and <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/government-policy-statement-on-land-transport-2024/>, accessed 8 March 2024

Case	Requiring authority requested lapse period	Court decision lapse period
Meridian 37 Ltd v Waipā District Council	15 years	5 years
Hernon v Vector Gas Ltd	10 years	5 years
Queenstown Airport Corporation Ltd	10 years	5 years

The above-noted examples of contested extended lapse periods each have particular circumstances that may not be directly comparable to the South FTN NoRs. However, the examples illustrate that the Environment Court does evaluate requests for extended lapse periods and the desire by the requiring authority for an extended lapse period has not always been successful in the Environment Court.

I consider the request for extended lapse periods for the South FTN NoRs below, in relation to the reasons given by the Requiring Authority for the requested lapse periods and the potential and actual effects of those extended lapse periods.

#### **4.26.1 Reasons for extended lapse period**

The following section quotes or summarises the reasons given by the Requiring Authority for the extended lapse periods<sup>474</sup> and then discuss each of those reasons.

##### **4.26.1.1 Date for implementation**

**NoR 1** – *Transport assessment and DBC recommend that the Great South Road FTN transport upgrades are implemented within the 2028-2038 period. A 15-year lapse period enables this likely implementation timeframe.*

**NoR 2** – (in summary) the three adjacent New Zealand Upgrade Programme (NZUP) funded projects, the SH1 Drury Interchange, the upgrade of Waihoehoe Road, and the Drury Train Station, which NoR 2 works are intended to integrate with, are proposed to be implemented in the mid-to-late 2020s. This means NoR 2 works are *likely to be required at the earlier end of the 2028-2038 range identified in the transport assessment and DBC.*

**NoR 3** - *Transport assessment and DBC recommend that the Takaanini FTN transport upgrades along the Weymouth/Alfriston Road corridor are implemented within the 2028-2038 period. A 15-year lapse period enables this likely implementation timeframe.*

**NoR 4** – *Transport assessment and DBC recommend that the Takaanini FTN transport upgrades along Porchester Road, and the Popes Road West upgrade, are implemented within the 2028-2038 period...the surrounding land use zoning to*

<sup>474</sup> AEE, p39-40

*the east of Porchester Road includes a large area of the Takaanini FUZ which is recommended at the time of writing to be removed as part of the Council's FDS. The area to the west of Porchester Road remains live-zoned.*

*The adjoining sections of FTN to the south are recommended as longer term prospects - the southern end of the Takaanini FTN is identified in the transport assessment and DBC as very long term (2048+) requirement, and the adjoining Ōpaheke North-South arterial is provided for through an operative designation which traverses areas not planned to be urbanised until the 2040s. Accordingly, a 15-year lapse period on NoR 4 appropriately 'bridges' the staging gap between sections of FTN to the north and south.*

*Given the above uncertainty, we consider that it is likely that this part of the Project will not be fully implemented until the later end of the 2028-2038 range identified in the transport assessment and DBC.*

#### Comment

Neither the DBC nor the DBC recommendations referred to in the 'date of implementation' rationale for the extended lapse period were provided in the supporting documents lodged with the South FTN NoRs.<sup>475</sup> At the time of writing this report, the DBC was not publicly available.<sup>476</sup> Appendix A to the AEE Assessment of Alternatives<sup>477</sup> contains discussion regarding the alternative routes, sites and methods considered through development of business cases, including the DBC. However, that discussion does not provide any information about the expected implementation timeframes alluded to in the stated reasons for the extended lapse period. The ATE states:

*The implementation timeframe and phasing for the project is currently unknown at this stage and the timing and extent of future urban development is similarly uncertain (due to uncertainty of funding availability). Implementation could be in 10 to 15 years' time and as such the following horizons for construction and operational effects have been adopted for assessment purposes:*

*Construction effects of the Project area assessed in the context of the land use and transport environment as it is assumed to exist in 2038...<sup>478</sup>*

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<sup>475</sup> The Assessment of Transport Effects refers to the 'South FTN and Key Connections Detailed Business Case 2023', which it says sets out the case for route protection for the project (refer Assessment of Transport Effects, op.cit., p6)

<sup>476</sup> Email communications, Report author with Liam Winters, SGA, 27 February 2024, and Hannah Miln, AT, 29 February 2024

<sup>477</sup> Te Tupu Ngātahi Supporting Growth, Appendix A Assessment of Alternatives, AEE op.cit.

<sup>478</sup> ATE, op.cit, p7

As noted in section 4.3.4 above, the Consultation Draft and then the adopted FDS made changes to the areas identified for future urban development and to the timing of the planned development. Table 13 in section 4.3.4 above compares the future urban areas and timing identified in the FDS to the FULSS. It is not apparent from the AEE or Assessment of Alternatives to what extent those changes have been taken into account in the 'date for implementation' rationale for the request for extended lapse periods for the South FTN NoRs.

The transport assessments referred to in the AEE discussion of lapse dates are not named, so it is not clear which transport assessments are being referred to.

It would be helpful for the Requiring Authority to expand on the date of implementation rationale for the extended lapse periods in evidence at the hearing.

#### **4.26.1.2 Design/consenting/property acquisition**

Provides sufficient time to undertake detailed design, obtain necessary resource consents, obtain funding, undertake tendering/procurement, undertake property and access negotiations, and construct the Project.

##### Comment

Indicative construction durations of 2-3 years for NoRs 1, 3 and 4, and 1-2 years for NoR 2 are set out in the AEE.<sup>479</sup> The AEE notes that NoR 1 is not a contiguous extent, but is rather made of 'several' separate areas and therefore *the total duration can likely be disaggregated further than the estimated duration of 2-3 years.*<sup>480</sup>

It is not apparent what time frame is envisaged for obtaining funding. It is also not apparent how long the detailed design, consenting, tendering/procurement and property negotiations would be anticipated to take. These are matters the Requiring Authority should explain in evidence at the hearing.

#### **4.26.1.3 Coordination**

Gives AT sufficient flexibility to coordinate Project delivery with related public works. For NoR 2 these are stated as the three NZUP Projects. For NoR 3 these related public works are stated as being: *the coordination between the Weymouth Road NIMT bridge replacement and the future four-tracking of the NIMT and consequent changes to the layout of Manurewa Train Station.* For NoR 1 and 4 no "related public works" are stated.

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<sup>479</sup> AEE, op.cit., Table 9-2

<sup>480</sup> AEE, p48

## Comment

The Council's section 92 request for further information asked for more explanation of how integration with other projects affects the requested lapse periods.<sup>481</sup> The Requiring Authority's response was that the NZUP projects that NoR 2 aims to integrate with are *expected to be completed in the mid-to-late 2020s and there is greater certainty of the implementation timeframes for these projects (i.e., within the next 10 years)...* *The lapse period ensures protection of the land required for the works from inappropriate development until the works can commence when funding is allocated.* The response did not provide any further information about the timing of and integration with the projects referred to in relation to NoR 3.

It will be helpful if the Requiring Authority provides further explanation in the hearing of the needs and timing for coordination of the South FTN NoRs with other projects.

### **4.26.1.4 Staged construction**

The nature of the work and designation is such that it is highly likely to be implemented in stages, so the flexibility afforded by a 15-year lapse period is merited (for NoR 1, 3, 4).

## Comment

The South FTN NoRs are described by the Requiring Authority as 'route protection'<sup>482</sup> and it is explained in the Assessment of Alternatives that, conventionally, route protection is used to ensure no development that would preclude or hinder the proposed work can proceed.

The Assessment of Alternatives notes that, while the South FTN is located in a largely urbanised context, the zoning applying to the South FTN project area (particularly under PC78) allows for a higher intensity of development than exists in many locations. Accordingly, the Assessment of Alternatives says, *there is still an opportunity to route protect and future-proof for the transport demands resulting from this intensification (particularly where existing development does not represent highest and best use of land). Conversely, where current development opportunities have been realised land use change may be more stable.*<sup>483</sup>

The Assessment of Alternatives does not explain which locations within the South FTN NoRs are expected to have limited land use change. However, I note that the AEE explains that finalising the route protection requirement included considering, amongst other things, the ability to achieve route protection in an urbanised context, and the level of development pressure along the routes.<sup>484</sup>

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<sup>481</sup> P11, Council section 92 request for further information, 30 October 2023

<sup>482</sup> AEE, op.cit., p5

<sup>483</sup> Assessment of Alternatives, op.cit., p22

<sup>484</sup> AEE, p35. Other considerations referred to are transport and urban form benefits, scale and cost, consideration of interdependent projects, and likelihood of future funding prioritisation.

The staging for construction of the South FTN has not be identified as yet, but it would be helpful for the Requiring Authority to explain what is anticipated in relation to staging and how this staging affects the need for an extended lapse period for the South FTN NoRs.

#### **4.26.2 Effects of extended lapse date**

Submissions on the South FTN NoRs raise a number of concerns regarding the adverse effects of the requested extended lapse periods (refer section 4.16.2). Those effects include uncertainty about the timeframe for construction of the Project, impediment to development of the submitter's land, the creation of 'planning blight', and impacts on the ability of land owners to plan for their property with corresponding adverse social and economic effects.

Section 4.16.1 above sets out the measures that the Requiring Authority proposes will reduce the uncertainty of an extended lapse date. These measures relate to processes to inform and engage with stakeholders, including directly affected and adjacent owners and occupiers of land.

Proposed Condition 2 Project Information would provide information to directly affected parties on the progress of the Project, how to contact the Requiring Authority, anticipated construction timeframes, and how to apply for consent for works under s176(1)(b) of the RMA. Proposed Condition 9 SCEMP identifies how directly affected parties will be engaged with through the construction works.

Section 4.8 of this report discusses the social impacts of the South FTN NoRs and recommends amendments and additions to the Proposed Conditions. I consider that those amendments would assist in mitigating the effects of extended lapse periods. It will be useful to hear the Requiring Authority's views on the recommended amendments, and to hear from submitters the extent to which they consider those amendments would address the concerns they raise, in relation to the request for extended lapse periods.

#### **4.26.3 Lapse Date - Conclusions**

The issues to be balanced in relation to the lapse period include:

- giving certainty to land owners
- Mitigating the adverse effects a designation has on the use of land
- Enabling integration with the timeframe of anticipated development of future urban areas
- Enabling alignment with the timing of and integration with other projects
- Providing sufficient time for the works to be designed, consented, funded, and for property agreements

I generally support that there can be a need for a designation to have an extended lapse period, for reasons that may be particular to each designation. However, as stated in section 4.16.4 of this report, I acknowledge that the extended lapse periods requested, along with the proposed extent of the designation, creates uncertainty for directly affected property owners and the community.

As noted above, it would be helpful for the Requiring Authority to expand on the reasons given for the extended lapse periods and to hear from the Requiring Authority in response to the issues raised by submitters, on how the effects of the requested extended lapse periods could be mitigated.

Subject to hearing the evidence of submitters and the Requiring Authority's response to the matters raised in this report, and noting the need for amendments to the Proposed Conditions identified in other parts of this report to address the social and property effects of the designations, my preliminary opinion is that the extended lapse periods are appropriate.

#### **4.27 Part 2 of the Resource Management Act 1991**

Part 2 of the RMA sets out the purpose and principles of the RMA.

The purpose of the RMA is set out in section 5(1): *to promote the sustainable management of natural and physical resources.*

Sustainable management is defined in section 5(2) as:

*...managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Section 6 of the RMA sets out the matters of national importance which must be recognised and provided for.

Section 7 of the RMA sets out other matters which shall be given particular regard to.

Section 8 of the RMA requires the principles of the Treaty of Waitangi to be taken into account.

An assessment under Part 2 of the RMA is provided by the Requiring Authority in section 11.3 of the AEE. I generally agree with the assessment provided, subject to the recommended amendments to the Proposed Conditions for the South FTN NoRs and the further assessment clarification sought in this report.



## 5 Conclusions

Auckland Transport as the requiring authority has lodged notices of requirement under section 168 of the RMA for the South FTN.

This report has identified a number of matters where the Requiring Authority is asked to provide more information, noting that the timetable that was set for the processing of the South FTN NoRs did not allow for more than one section 92 request for further information. Also it should be noted that there are some matters where Council's section 92 request asked for information but did not receive it. Those matters are noted in the relevant technical specialist memos (**Attachment 2**). Matters to be addressed include addressing permitted activities and resource consents that have been granted and are likely to be implemented as part of the receiving environment against which effects of the South FTN NoRs are assessed.

The South FTN NoRs are for route protection for the parts of the South FTN where third-party land is needed. The NoRs seek to protect the route of the South FTN and key connections, and for that reason do not include a detailed design. Management Plans are intended to be prepared and most will be submitted with the Outline Plan for a stage of work. The use of management plans is accepted, and much of the focus of this report and the technical assessments by Council specialists (**Attachment 2**) has been on ensuring that the objective, content, timing and process for preparing the management plans will ensure that adverse environmental effects are avoided, remedied or mitigated. Opportunities for inputs by affected owners and occupiers, the community, and by network utility operators, at an early enough stage in the process to influence the detailed design and the measures identified in management plans, has been a common theme for many of the topics discussed in this report.

The recommendations in this report do not include any recommendations to the spatial extent of the NoRs. However, a number of issues have been raised for the Requiring Authority to address in the hearing which have a bearing on the extent of the NoRs, including responding to property-specific concerns of submitters, identifying where retaining walls might reduce land required, and avoidance of certain features such as the War Memorial and adjacent open space at Central Park Cenotaph and the distinctive mound at Chisholm Corner. Modifications to the boundaries of NoR 4 raised in the minor alterations letter to Council (refer section 2.8 above) will also need to be addressed by the Requiring Authority and considered in the hearing.

Many of the issues raised by submitters relate to the uncertainty about when the South FTN works will be implemented, and about the designation and property acquisition process. As noted in this report some of these issues relate to the PWA processes, rather than being RMA matters. The interrelationship is noted in relation to section 185 of the RMA, which provides for an owner of land that is subject to a designation to apply to the Environment Court for an order obliging the requiring authority responsible for the designation to acquire or lease all or part of the owners land under the PWA.

The Requiring Authority has already provided information about the property acquisition process to those directly affected. The need for consultation and engagement with affected landowners and occupiers will be ongoing, and is provided for in the Proposed Conditions. The recommended amendments to the Proposed Conditions further enhance ongoing consultation and engagement at the earliest possible stage in the Project.

The conclusions and recommendations in this report are subject to a number of matters that need clarification by the Requiring Authority. Recommendations for amendments to the Proposed Conditions for the South FTN NoRs are set out in **Attachment 5** to this report, and include minor formatting and cross referencing changes as necessary to retain the meaning of the Conditions. The recommended amendments are based on the advice from Council's technical specialists and the planning assessment of matters that include whether conditions are reasonable and relate to the effects of the South FTN NoRs, have a clear meaning and provide certainty, and are for a resource management purpose.

## **6 Recommendation and conditions**

### **6.1 Recommendation**

Subject to new or contrary evidence being presented at the hearing, and the Requiring Authority supplying adequate responses on issues raised in the body of this report, pursuant to section 171(2) of the RMA it is recommended that the South FTN notices of requirement be confirmed, subject to the amended and additional conditions set out in **Attachment 5** to this report.

Pursuant to section 171(3) of the RMA the reasons for the recommendation are as follows:

- (a) the notices of requirement will promote the sustainable management of natural and physical resources in that they enable people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.
- (b) the notices of requirement are consistent with and will give effect to the relevant national environmental standards, national policy statements and the AUP:OP.
- (c) the notices of requirement satisfy section 171(1)(b) of the RMA, in that adequate consideration has been given to alternative sites, routes or methods for undertaking the work.
- (d) The notices of requirement satisfy section 171(1) of the RMA, in that the notices of requirement are reasonably necessary to achieve the requiring authority's objectives.
- (e) Conditions attached to the notices of requirement, will ensure that the notices of requirement appropriately avoid, remedy or mitigate adverse environmental effects.

## 6.2 Recommended conditions

The conditions set recommended by the reporting planner for the South FTN NoR are set out in **Attachment 5** to this report.

- Attachment 1: SECTION 92 REQUESTS AND RESPONSES**
- Attachment 2: AUCKLAND COUNCIL SPECIALIST REVIEWS**
- Attachment 3: SUMMARY OF SUBMISSIONS**
- Attachment 4: COPIES OF SUBMISSIONS  
AND LOCAL BOARD VIEWS**
- Attachment 5: RECOMMENDED AMENDMENTS  
TO THE PROPOSED CONDITIONS**
- Attachment 6: EXAMPLES OF CONDITIONS  
FOR DEVELOPMENT RESPONSE  
MANAGEMENT PLANS**

**ATTACHMENT TWO**  
**AUCKLAND COUNCIL SPECIALIST REVIEWS**



## Attachment 2: Auckland Council Specialist Reviews

### Index of Reports

	Specialist Review	S42A Report Topic	Report Section (where mainly discussed)
A	Wes Edwards, Memo (technical specialist report to contribute to Council's section 42A hearing report), Notices of Requirement-South FTN-Transport Review, 22 February 2024	Traffic and Transport effects	4.4
B	Peter Runcie, Technical Specialist Memo-Acoustics, Supporting Growth Alliance – South FTN NoRs 1-4, 26 February 2024	Noise and vibration effects	4.5
C	Lisa Mein, Memo: Technical specialist memorandum for notices of requirement for South FTN: Urban Design, 17 February 2024	Urban design effects	4.6
D	Rob Pryor, Technical Memorandum for Notices of Requirement, FTN Project, 13 February 2024	Landscape and visual effects	4.7
E	Dr Gillian Stewart, Technical memorandum for Notices of Requirement for South FTN: Social effects, 4 March 2024	Social Impacts	4.8
F	Daniel Kinnoch, Section 42A Report on the South FTN Notices of Requirement – Parks Planning, 7 February 2024	Open space effects	4.9
G	Trent Sunich, Auckland Council memorandum (technical specialist report to contribute towards Council's section 42A hearing report), South FTN NoRs Stormwater and Flood Hazard Technical Assessment, 28 February 2024	Flooding effects	4.10
H	Dan Windwood, Technical Memorandum for South FTN Notices of Requirement for works 1 to 4: Built Heritage, 14 February 2024	Historic heritage effects (built heritage)	4.11
I	Myfanwy Eaves, Technical Memorandum, Notices of Requirement for works NoR 1 to NoR 4: Historic heritage, archaeology, 9 February 2024	Historic heritage effects (archaeology)	4.11
J	West Fynn, Memo, South FTN NoR with Possible Adverse effects on various notable trees within the proposed designation, 19 February 2024	Historic heritage effects (historic trees)	4.11
K	Leon Saxon, Aboricultural Memorandum, Aboricultural Assessment of 4 NoR for the South FTN, 20 February 2024	Aboricultural effects	4.13
L	Simon Chapman, Technical expert s.42A Memo – Terrestrial Ecology, South FTN, 4 March 2024	Ecological effects (terrestrial ecology)	4.14
M	Antoinette Bootsma, Technical Expert Memo for South FTN NoRs, 5 March 2024	Ecological effects (streams)	4.14
N	David Russell, Technical Expert Evidence for s.42A Report, South FTN, 14 February 2024	Construction effects	4.15
		Network utility effects	4.17





**Memo (technical specialist report to contribute towards Councils' section 42A hearing report)**

22 February 2024

To: Cheryl Cleary, Consultant Reporting Planner

From: Wes Edwards, Consultant Technical Specialist - Transport

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**Subject: Notices of Requirement – South Frequent Transit Network - Transport Review**

## **1 Executive Summary**

- 1.1 At the request of Auckland Council I have undertaken a review of notices of requirement (**NoRs**) for the South Frequent Transit Network (**FTN**) Projects in relation to transport effects.
- 1.2 After reviewing the notified material and submissions I have a few concerns about transport matters, recommend some additional information be provided, and recommend some amendments to conditions.
- 1.3 The Notices are intended to protect the land expected to be required for implementation of the South FTN Projects at some time in the future. The Notices are based on concept design drawings which are subject to refinement and change as part of a later detailed design process expected to be undertaken at the Outline Plan (**OP**) stage prior to construction. Some future design decisions have the potential to significantly change the impact on several properties.
- 1.4 The General Arrangement (**GA**) concept design drawings show ambiguous median treatments which could be flush medians or raised islands, with decisions to be made in detailed design. The drawings appended to the Urban Design Evaluation (**UDE**) show flush medians and islands differently. The information provided to date says that no locations have been identified where raised islands need to be installed, but in my view there are some locations where the Project would significantly increase the probability of raised islands being introduced at a later time. Any such islands would remove right turn movements at some driveways and some side roads.
- 1.5 I note the proposed Conditions do not require the Projects to be undertaken in general accordance with the GA or the UDE drawings, only the broad description of each Project and the Concept Drawings which have far less detail than the GA or UDE drawings. This tends to exacerbate the issues relating to lack of detail and certainty.
- 1.6 The superseding of the Future Urban Land Supply Strategy (**FULSS**) by the recent adoption of the Future Development Strategy (**FDS**) by Auckland Council is expected to have a significant impact on the growth the Projects are intended to provide for. I expect the removal of large growth areas in both Takanini and Drury East, the red flagging of development areas in Takanini and Opāheke, and the sometimes-significant deferral of development of the remaining areas, will mean a reduction in growth and a delay in development. Some submitters have questioned the need or justification for the Projects in light of this change.
- 1.7 Aside from those concerns, and a number of relatively minor caveats, I find the remainder of the assessment of transport effects to be broadly acceptable.
- 1.8 In my view the key matters of the assessment of alternative methods and the necessity of the designation are somewhat interlinked and can be considered at various scales.
- 1.9 I consider the assessment of alternatives to be generally adequate at the larger scale. In other words, if transport improvements in this area are necessary, alternative routes and alignments have been given adequate consideration at that scale.

- 1.10 Due to issues such as those discussed above, I consider the assessment of alternative methods at a finer scale, including in relation to detailed impacts on several properties, would benefit from additional assessment.
- 1.11 Based on the evaluation against the FULSS development scenario I consider the Projects to be reasonably necessary at a high level, as I consider they are necessary to improve the operation of the future transport network in the area to cater for planned growth and achieve the objectives of these projects, which I outline at paragraph 4.4. A key issue is that the FDS development scenario is significantly different from the FULSS scenario and the need for each of the projects should be re-examined in this new context.
- 1.12 I have some concerns about the assessment of alternative methods at the more detailed level. In some locations land is proposed to be taken so that separated cycle paths can be provided. In my view the necessity of requiring that land has not been adequately demonstrated or justified, particularly where an alternate method, such as using a shared path instead of separate paths, or adjusting widths, may have lesser impact.
- 1.13 I make recommendations for changes to the conditions relating to the closure of bridges, to existing property access, and to the Construction Traffic Management Plan.
- 1.14 I recommend that additional information is provided about several aspects. These are discussed in the body of the report, in the appendix addressing submissions, and summarised in the conclusion. I make several interim recommendations that are subject to review upon receipt of that additional information and the evidence of submitters. My interim recommendations are:
- a) NoR 1: Great South Road Frequent Transit Network Upgrade – Confirm with amendments.
  - b) NoR 2: Great South Road Upgrade (Drury Section) – Confirm with amendments.
  - c) NoR 3: Takanini FTN – Weymouth Road, Alfriston Road and Great South Road Upgrades – Confirm with amendments.
  - d) NoR 4: Takanini FTN – Porchester Road and Popes Road Upgrades – Confirm with amendments.

## **2 Introduction**

- 2.1 At the request of Auckland Council I have undertaken a review of notices of requirement (NoRs) for the South Frequent Transit Network Projects (South FTN) in relation to transport effects.

### **Qualifications and Experience**

- 2.2 My name is Wes Edwards. My current role is Transportation Advisor and Director of Arrive Limited, a company which I founded in 2002.
- 2.3 I hold a New Zealand Certificate in Civil Engineering, and a Bachelor's degree in Civil Engineering. I am a Chartered Professional Engineer and an International Professional (APEC) Engineer.
- 2.4 I am an Engineering New Zealand Fellow and a Professional Member of the Institute of Transportation Engineers.

- 2.5 I have more than thirty-eight years engineering experience, with more than thirty-two of those years as a transport specialist based in Auckland.
- 2.6 I am a road safety auditor, have experience in collision investigation and road safety engineering, am accredited by KiwiRail as a Level Crossing Safety Impact Assessor, and have formerly been accredited by New Zealand Transport Agency Waka Kotahi (**NZTA**) as a Traffic Controller, Inspector, and Site Traffic Management Specialist.
- 2.7 I have experience in the design of transport infrastructure including intersections controlled by traffic signals or roundabouts, the design and layout of streets and neighbourhoods, the design of bus interchanges, bus priority measures, active modes lanes and paths, and parking facilities.
- 2.8 I am a member of the Standards Australia committee responsible for the AS/NZS 2890 series of Parking Facilities standards, including being a member of the working group responsible for revising AS/NZS 2890.1 Parking facilities Part 1: Off-street car parking which is a key document for by the New Zealand Building Code and referenced by the Auckland Unitary Plan.
- 2.9 I have experience in the design of transport-related aspects of residential, retail, commercial and industrial sites including the movement of pedestrians, light vehicles, and large vehicles.
- 2.10 I have experience in traffic engineering and transport planning matters associated with resource management, including resource consents, structure plans and plan changes, and notices of requirement for road infrastructure, rail infrastructure, and schools;
- 2.11 I have provided specialist opinions on traffic and transport matters as an expert witness in council, District Court, Environment Court, Land Valuation Tribunal, Environmental Protection Agency Board of Inquiry, and High Court proceedings.
- 2.12 I was formerly accredited by the Ministry for the Environment as a Resource Management Act Hearings Commissioner.
- 2.13 My work experience in this area and relevant to this matter includes:
- a) Advising Auckland Council or private parties on several private plan changes, significant developments, and Notices of Requirement (NoRs) for schools, rail infrastructure projects, and arterial road infrastructure projects including:
    - i) Addison (plan changes and subdivisions), Takanini, 2005-19;
    - ii) NZTA NoRs for widening of State Highway One in Whangarei, 2010-18;
    - iii) Waiata Shores subdivision, Takanini, 2010-18;
    - iv) KiwiRail NoRs for North Island Main Trunk Wiri to Quay Park, 2020-2021;
    - v) PC61 Waipupuke (Drury West), 2020-21;
    - vi) KiwiRail NoRs for Ngākōroa (Drury West) station and interchange, 2021-2023;
    - vii) NZTA NoR Warkworth – Te Hana motorway, 2021;
    - viii) NZTA NoR for SH1/ SH29 intersection Piarere, 2022;
    - ix) NZTA and Auckland Transport NoRs for Pukekohe Transport Network, 2022-;
  - b) Advising councils and private parties on numerous development projects.

## **Code of Conduct**

- 2.14 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 2.15 I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## **Involvement in this Matter**

- 2.16 I was engaged by the councils in 2023 to advise on these Notices and participated in discussions about the Projects prior to the lodging of the Notices. I am familiar with the road network in the area and visited it specifically for this assessment in September 2023.

## **Scope and Structure**

- 2.17 This memo is my expert technical evidence on the South Frequent Transit Network (**FTN**) Notices and submissions relevant to my area of expertise. The South FTN Notices are:
- a) South FTN NoR 1: Great South Road FTN Upgrade
  - b) South FTN NoR 2: Great South Road Upgrade (Drury Section)
  - c) South FTN NoR 3: Takanini FTN – Weymouth, Alfriston, and Great South Road Upgrades
  - d) South FTN NoR 4: Porchester and Popes Road Upgrades.
- 2.18 I have considered the concept design and proposed conditions with respect to traffic engineering matters including consideration of road safety, capacity and efficiency, and temporary traffic management during construction. I have provided comment on how the Projects align with strategic planning documents with respect to transport planning matters. These matters are within my area of expertise.
- 2.19 The consideration of some matters is outside the scope of this report or my expertise. I do not consider:
- a) matters relating to noise, dust, or light spill generated by vehicle movements;
  - b) matters relating to stormwater runoff;
  - c) matters relating to road pavement, road surfacing, earthworks, or structures;
  - d) the affect of traffic on amenity, except in the general context of street design;
- 2.20 In preparing this memo, I have reviewed the following documents:
- a) Form 18 Notice of Requirement for each of the four NoRs including the Schedule 1 Descriptions, Concept Drawings, and proposed conditions;

- b) the Assessment of Environmental Effects (**AEE**);
- c) the Assessment of Alternatives (**AOA**) appended to the AEE;
- d) the Assessment of Transport Effects (**ATE**) and appendix;
- e) the General Arrangement (GA) drawings;
- f) the Urban Design Evaluation (UDE) drawings;
- g) the s.92 request for further information dated 30 October 2023;
- h) the Requiring Authority s.92 response dated 10 November 2023;
- i) submissions relating to transport; and
- j) comments made by the Franklin Local Board.

2.21 This review considers transport matters common to all four Projects and also considers aspects of each Project separately. The outline of this report broadly follows the Auckland Council specialist report template and includes the following sections:

- a) an overview of the key transport issues for these notices (Section 3);
- b) a summary of the Projects (Section 4);
- c) a summary of the Requiring Authority's (**RA**) transport assessment (Section 5);
- d) additional description of the transport environment (Section 6);
- e) a summary of the assessment of alternatives (Section 7);
- f) my review of operational transport effects and management methods (Section 8);
- g) my review of construction transport effects and management methods (Section 9);
- h) statutory considerations (Section 10);
- i) a review of transport matters raised in submissions and by the Local Boards (Section 11 and Appendix B); and
- j) a review of the proposed conditions (Section 12);
- k) conclusions and recommendations (Section 13).

## Terminology

2.22 I refer to the four Projects that make up the Southern FTN Projects as the South FTN projects to distinguish them from other projects in the area.

2.23 In this report "bus lane" refers to a lane restricted to buses, motorcycles, mopeds and bicycles (signed as Bus Lane) and also to lanes restricted to buses only (signed as Bus Only). "Transit lane" refers to a lane restricted to vehicles carrying two or more (T2), or three or more (T3) people, taxis, bicycles, motorbikes and mopeds. "Priority lane" refers to a bus lane, transit lane, or a freight lane restricted to heavy goods vehicles (not currently used in Auckland).

- 2.24 In this report “active mode” refers to travel by walking, cycling, scooters, mobility devices and similar modes of transport.
- 2.25 In traffic engineering the term “berm” typically means the area between the road carriageway and the road boundary, either including or excluding any paths and drainage ditches. These areas are typically reasonably flat and grassed. In traffic engineering the term does not usually refer to a raised strip of land which can also be called a berm or a bund. I understand the berm referred to in the Supporting Growth Alliance (**SGA**) material to be a level strip beside a path used to separate the path from other features which is grassed unless described as landscaped.
- 2.26 Where locations or organisations have multiple or alternative names the formal or legal name is used.
- 2.27 A glossary of terms and abbreviations used in this memo is appended (**Appendix A**).

### 3 Key Transport Issues

- 3.1 Table 1 lists the key transport issues for each Notice which are summarised below.

*Table 1: Key Transport Issues in South FTN NoRs*

<b>Notice</b>	<b>Key Transport Issues</b>
1: Great South Rd FTN	<ul style="list-style-type: none"> <li>i. Provision for growth</li> <li>ii. Project interdependencies</li> <li>iii. Assessment of operational effects</li> <li>iv. Management of construction effects</li> <li>v. Cycle path safety</li> <li>vi. Alternate methods</li> </ul>
2: Great South Road Upgrade (Drury)	<ul style="list-style-type: none"> <li>i. Provision for growth</li> <li>ii. Project interdependencies</li> <li>iii. Assessment of operational effects</li> <li>iv. Management of construction effects</li> </ul>
3: Takanini FTN	<ul style="list-style-type: none"> <li>i. Provision for growth</li> <li>ii. Project interdependencies</li> <li>iii. Assessment of operational effects</li> <li>iv. Management of construction effects</li> <li>v. Cycle path safety</li> <li>vi. Alternate methods</li> </ul>
4: Porchester and Popes Rd Upgrades	<ul style="list-style-type: none"> <li>i. Provision for growth</li> <li>ii. Project interdependencies</li> <li>iii. Assessment of operational effects</li> <li>iv. Management of construction effects</li> <li>v. Active mode crossing safety</li> <li>vi. Alternate methods</li> </ul>

#### Provision for Growth

- 3.2 The Auckland Region has experienced high rates of population growth over the past decades, and growth is expected to continue at relatively high rates into the future. Policies and strategies at both a national and regional level are focussed on providing for a significant proportion of that growth through intensification within the existing urban footprint, supplemented by “greenfield” growth in some rural areas around the periphery of the city.
- 3.3 High-level structure planning for the Drury and Opāheke areas has been undertaken as part of the Drury-Opāheke Structure Plan (**DOSP**) which was supported by an extensive but high-level Integrated Transport Assessment (**ITA**). That work has considered possible land use

patterns and the structuring of infrastructure, with the planned transport network being a key consideration in the determination of the projects.

- 3.4 As the ability to fund and construct bulk infrastructure to support growth is limited and there is an increased focus on addressing flooding hazards and adapting to climate change, on 2 November 2023 Auckland Council adopted the Auckland Future Development Strategy 2023-2053 (FDS) replacing the Auckland Plan 2050 Development Strategy 2018 and Future Urban Land Supply Strategy July 2017 (FULSS).
- 3.5 Greenfield areas in Takanini and Drury were expected in FULSS to accommodate a significant portion of growth in the southern Auckland region, but the FDS has removed some areas, restricted development in other areas until stormwater catchment management planning has occurred, and deferred the development period of some remaining areas.
- 3.6 Population growth results in increased demand for travel. Travel enables people and communities to provide for their social, economic and cultural well-being, and has the potential to adversely affect those matters, health and safety, and the natural environment.
- 3.7 The Projects proposed to be enabled by the NoRs are intended to accommodate the increased demand for travel generated by the growth expected to occur while addressing some of the adverse effects of that increase. For that reason alone the Projects have significant benefits; however, with the changes made to the FDS the benefits outlined in the notified material are likely to be over-stated, particularly in the medium-term.
- 3.8 This issue is relevant to all Notices, and particularly NoR 4: Porchester and Popes Upgrades where the Project may no longer be reasonably necessary for achieving the stated objectives of the requiring authority (see paragraph 4.4), given the removal and potential reduction in intensity of growth in this area.

## **Project Interdependencies**

### **All Notices**

- 3.9 The four Projects are intended to address and enable growth in concert with other projects in the area. Some of those projects are being constructed at this time (for example rail electrification, widening of the Southern Motorway between Papakura and Drury, others have designations in place (e.g. Drury Arterials), and others are planned to be addressed in parallel with these NoRs, or in the future (e.g. widening of the Southern Motorway between Drury and Bombay, and the Manukau to Takanini Access and Safety project formerly known as Mill Road). The Projects to grade-separate the Takanini Level Crossings are proposed to be heard together with these projects and have been reported on separately.
- 3.10 While the four Projects that are the subject of these NoRs could be built and operated independently of the other three Projects, some parts are dependant on at least parts of other projects, and each of the Projects is intended and designed assuming that all of the other Projects would also be implemented. Some of the Projects could also be constructed in stages with some sections implemented earlier than others.

## **Assessment of Operational Effects**

- 3.11 The Projects would provide substantial benefits but would also produce some adverse effects.
- 3.12 All Projects are located along existing roads. In some cases the projects require additional land along one or both sides of those roads so that new or improved transport facilities can be provided. In some locations the design of those facilities is expected to remove existing development, alter property access arrangements, or change movements at intersections.

- 3.13 A key issue for all of the NoRs is how the adverse effects generated by the design and operation of the Projects can be assessed, particularly as many design decisions have yet to be made, and some of those design decisions may affect the scale and management of effects.

### **Management of Construction Effects**

- 3.14 Adverse effects will be produced while the Projects are being constructed, and the construction of most Projects is expected to extend over many months and potentially be staged over several years. A key issue for all of the NoRs is how the adverse effects generated by the Projects can be managed during construction. This issue is acute for NoR 1, NoR 2, and NoR 3 as they involve replacement of bridges and closure of any of these bridges would have major adverse effects on the transport network.

#### **NoR 1: Great South Road FTN**

- 3.15 This Project includes the replacement of Slippery Creek bridge. Closure of the bridge to traffic would have a major adverse impact on operation of the road network in the area so should be avoided until additional capacity is provided by the Mill Road project and/ or the proposed North-South Opāheke Arterial which are described at paragraph **Error! Reference source not found.** Depending on the traffic conditions at the time, it may also be necessary to avoid closure of the bridge except during periods of low traffic flow.

#### **NoR 2: Great South Upgrade (Drury)**

- 3.16 This Project includes the replacement of Hingaia Stream bridge. Closure of the bridge to traffic would have a major adverse impact on operation of the road network in the area so should be avoided, except during periods of low traffic flow (e.g. overnight) when the detour route would have sufficient capacity to accommodate the flows.

#### **NoR 3: Takanini FTN**

- 3.17 This Project includes the replacement of the bridge over the Southern Motorway on Alfriston Road and the replacement of the bridge over the North Island Main Trunk railway on Weymouth Road. Closure of either bridge to traffic would have a major adverse impact on operation of the road network in the area so should be avoided, except during periods of low traffic flow (e.g. overnight) when the detour routes would have sufficient capacity to accommodate the flows.

### **Safety of Cycle Paths**

- 3.18 I have significant concerns about the safety of the proposed cycle paths where they are crossed by numerous existing driveways. The cycle paths are located relatively close to the road boundary where cyclists on the path and vehicles leaving a driveway may not have sufficient visibility of each other to provide for safe operation. This risk increases in proportion to the number of cyclists, the number of driveways, and the number of vehicles using the driveways.
- 3.19 I consider this risk is significant for NoR 1 and most parts of NoR 3. I consider the risk is less significant for NoR 2, NoR 4, and the Weymouth Road section of NoR 3.



## Alternate Methods

- 3.20 I consider the assessment of alternate routes and methods to be adequate for all Projects at the macro scale; however, in my view additional investigation and assessment of alternate methods is warranted at a finer scale in some locations. This may include, for example, further consideration of the option to control the Porchester Road / Popes Road intersection with traffic signals instead of a roundabout. Another example would be considering the use of shared paths and/ or fine-tuned path dimensions in some areas as that could significantly reduce the adverse impacts on multiple properties.

## 4 Summary of the Projects

- 4.1 The report considers four Notices of Requirement for road projects in the Manukau, Manurewa, Alfriston, Takanini, Papakura, and Drury areas of southern Auckland. Auckland Transport (AT) is the Requiring Authority (RA) for the projects. The assessments and other documentation have been prepared by Supporting Growth Alliance (SGA), a collaboration between AT and NZTA.
- 4.2 None of the Projects are expected to be implemented in the short to medium term. The designations sought by the NoRs are intended to protect the routes from development that would prevent or hinder the implementation of the Projects.
- 4.3 The Projects are generally well described at a high level in the notified material and I summarise each project below. Some aspects of each project are described in more detail later in this report.
- 4.4 The Project Objective is the same for each of the four Notices and is:
- Provide for an upgraded multi-modal transport corridor between Manukau and Drury that:*
- *Improves connectivity and access to economic and social opportunities;*
  - *Improves safety;*
  - *Improves efficiency, resilience and reliability;*
  - *Integrates with and supports existing development and planned urban growth;*
  - *Integrates with and supports the existing and future transport network; and*
  - *Improves travel choice and contributes to mode share shift.*
- 4.5 It is useful to note that neither the Project Objectives nor the conditions require AT to install bus lanes, cycle paths, or many other aspects of the Projects shown on the General Arrangement or any other drawings apart from the Concept Plans referenced in the conditions. The Concept Plans show some elements such as modified carriageways and intersections but do not show the extent or nature of special lanes (e.g. bus lanes) or paths (e.g. cycle paths).
- 4.6 I expect the hearings panel will wish to consider the works sought to be enabled and required by the Notices against the justification for the Projects which are based on bus priority lanes and cycle paths being implemented within the NoR sections and on other connecting sections of road.

### NoR 1: Great South Road Frequent Transit Network Upgrade

- 4.7 The Great South Road Frequent Transit Network Upgrade (NoR 1) is a Project along parts of Great South Road from Manukau in the north to Drury in the south. The Project involves widening parts of the road corridor, changing some intersections, replacing a bridge, and as shown on the GA drawings, may include changing cycle facilities.

- 4.8 The probable design of this corridor is considered in more detail later in this report, however as a summary, most proposed features could be provided with the existing road reserve, and the expansion of the road reserve would enable the permanent features in Table 2, and space to facilitate construction of the Project.

*Table 2: Project features provided for by expanded road reserve - NoR 1*

Section	Traffic Lanes	Cycle Paths	Bridge Replacement
1A and 1B: Browns-Grand Vue		Y	
1C: Mahia	Y	Y	
1D: Taka		Y	
1E: Subway		Y	
1F: Wellington		Y	
1G: Beach		Y	
1H: Park Estate		Y	
1I: Slippery Creek			Y

### **NoR 2: Great South Road Upgrade (Drury Section)**

- 4.9 The Great South Road Upgrade (Drury Section) (NoR 2) is a Project to widen the road corridor, to provide additional lanes in Drury in conjunction with changes to an intersection, replacement of a bridge, and possibly changes to active mode facilities.
- 4.10 Most features of the project could be accommodated within the existing road reserve except for a short length near the eastern end where additional land is required to accommodate the new cross-section. Additional land is required to facilitate construction of the Project.

### **NoR 3: Takanini Frequent Transit Network**

- 4.11 This Project includes changes to Weymouth and Alfriston Road and a section of Great South Road in Manurewa to widen the road, provide a new lane in conjunction with changes to some intersections, replace two bridges, close an intersection, and potentially make changes to active mode facilities.

### **NoR 4: Porchester Road and Popes Road Upgrades**

- 4.12 The Porchester Road and Popes Road Upgrades Project (NoR 4) would provide for widening of the road corridor, the probable provision of active mode facilities, and changes to some intersections.

## **5 Requiring Authorities' Transport Assessment**

- 5.1 SGA has prepared the Assessment of Transport Effects (ATE) report for the Projects for AT which has informed the Assessment of Environmental Effects (AEE).
- 5.2 The ATE and AEE provide a brief summary of the planning and project refinement process that led to the adoption of the proposed network and the Notices that are intended to protect the routes and enable the eventual implementation of the Projects. An Assessment of Alternatives (AOA) is appended to the AEE.
- 5.3 The AEE and ATE describe the general approach to the assessment of these Projects, which can be summarised as:

- a) considering the operational effects of all the Projects together in the environment when currently planned growth<sup>1</sup> is completed, nominally 2048+, meaning around 2048 or beyond;
  - b) deferring the detailed design and address individual property access arrangements to the Outline Plan (OP) stage; and
  - c) deferring the management of effects produced by construction to a range of management plans.
- 5.4 The ATE is informed by a range of data sources including historical crash data, and software models of forecast transport environments at regional and local scales. The regional transport model is based on forecast land use patterns, with the version used for assessing the Projects assuming the land use patterns contained in the FULSS are realised.
- 5.5 The notified material explains that the designs provided are initial concept designs developed to determine the areas of land that need to be protected. The intention is that sufficient land will be protected to enable a Project to be implemented at some point in the future. The final form of each Project could be different to the concept designs included in the notified material.
- 5.6 I generally agree with most of the AEE and ATE and the conclusions drawn, although those conclusions are subject to a few caveats that I discuss later in this report.
- 5.7 A key matter for consideration is that the assessments are based on modelling that is based on outdated growth forecasts, and critically assumes that bus lanes will be provided (mostly as shown on the UDE drawings) yet the Notices do not require such lanes to be provided.

### **Additional Information**

- 5.8 After the NoR documentation was lodged it was reviewed to determine if sufficient information was available to allow for an assessment of effects. Four transport-related requests were made in Council's Request for Further Information (RFI) dated 30 October 2023. AT's response to the RFI was provided on 10 November 2023.

### **Nature of medians**

- 5.9 AT was requested to provide an assessment of effect on properties affected by the removal of right turn movements. The response noted: *"The assessment has assumed that these are flush medians unless it has been identified a solid median/ traffic island is required for safety / operational reasons. No location has been identified where a solid median/traffic island is required that may impact property access."*
- 5.10 I have identified a number of locations where I expect median islands would be more likely to be installed because of the Project and address the possible effects later in this report.

### **Extent of Bus Lanes**

- 5.11 AT was requested to show the extent of the proposed bus lanes on the GA drawings, or in the event the type of lane has not been determined, a description of alternative types of lane. AT responded as follows:

*"The extent of bus lanes recommended for the full South FTN network is shown in the Urban Design Evaluation (UDE) plans (appended to the UDE). It should be noted that some of the bus lanes shown in these plans fit within the existing road reserve and accordingly are not*

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<sup>1</sup> As per the Auckland Council Future Urban Land Supply Strategy (FULSS) which has since been replaced by the Future Development Strategy.

*within an NoR. Bus lanes in one or both directions are provided for much of the length of Great South Road within the project extent (both within NoR 1 and the existing road reserve), and bus lanes in both directions are provided for along much of Weymouth and Alfriston Roads (NoR 3). The only sections of widened corridor not explicitly providing for bus lanes are NoR 2 (GSR Drury section) and NoR 4 (Porchester / Popes).*

*The recommended allocation of road space is linked to an assumed level of service for buses – AT guidance identifies where bus lanes are likely to be justified, and this guidance relates both to bus volumes; and the extent to which buses are impeded by other traffic. The consideration of these matters is guided by AT's future network planning which identifies future bus routes and likely bus volumes; and traffic modelling data which identifies where buses are likely to be impeded without priority measures. Given that the recommended form of the project/allocation of road space is linked to achieving a level of service for specific bus services, the rationale for the additional road space would not exist if the bus services did not eventuate/were not funded (because the volume of buses would not exist and buses would not be impeded by traffic. ”*

- 5.12 One of the planning items (P22) requested AT provide further information around the positive effects attributed to bus lanes if additional lanes are used by general traffic with a similar response provided by AT.
- 5.13 Further review during the evaluation identified that the works were not proposed to be undertaken in general accordance with the GA drawings or the UDE drawings, but only in general accordance with the Schedule 1 description, Concept Drawing, and Conditions. None of those items require the provision of any bus lanes. This is discussed at various points in this report.

#### **On-Street Parking in Alfriston Road**

- 5.14 AT was requested to confirm whether any of the existing identified parking bays on Alfriston Road are to be removed, and if they were to be removed that an assessment of effects of the removal be provided. AT's response confirmed the spaces would be removed and stated the effects had been considered in the ATE.

#### **Assessment of Alternative Methods**

- 5.15 AT was requested to describe the alternative methods considered in arriving at the proposed designation footprint, particularly in relation to the use of retaining walls instead of batter slopes. AT responded as follows:

*“The concept level of design has been prepared to inform the designation boundaries and the NoR phase. Generally, unless constrained, 1V:3H slopes have been adopted as the default batter for cut and fill slopes. The 1:3 design provides a practicable and stable slope that meets the relevant standards and maintenance requirements while minimising the impact on properties.*

*The design approach is to provide cut and fill embankments, with retaining walls provided in constrained locations. Given the limited geotechnical information available, where required, retaining walls have not been designed. Final wall types will be confirmed during subsequent design phases. As the construction of the Project is not expected for some time, the use of batter slopes to inform the proposed designation will enable greater opportunity to integrate with adjacent land and achieve optimal outcomes for a future environment that is likely to change.*

*The proposed Urban and Landscape Design Plan (ULDMP) condition provides a mechanism to consider the edge treatment and interfaces. For example, these concerns can be addressed through the following ULDMP clauses:*

- Clause (f) - to achieve the objective of the ULDMP(s), the ULDMP shall provide details of how the project (i) is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), natural environment, landscape character and open space zones;
- Clause (g) - The ULDMP(s) shall include: (iii) Landscape and urban details - that cover the following: (a) Road design - elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses and existing roads (including slip lanes)... (c) architectural and landscape treatment of all major structures, including bridges and retaining walls...

*The ULDMP shall be prepared prior to the Start of Construction for a Stage of Work and submitted as part of an Outline Plan of Works (following the processes of s176A of the RMA).*

- 5.16 While the response refers to “optimal outcomes” it does not discuss consultation or feedback with affected property owners or others, so it is unclear who the outcome might be optimal for. This topic is considered further below, including where matters raised submissions are considered.
- 5.17 In their evidence for the Pukekohe Transport Network NoRs, SGA witnesses have addressed the decision to use retaining walls instead of batter slopes in order to reduce the extent of the designation.
- 5.18 An SGA engineering witness, Mr Busnardo, is of the view:

*The designation extent is required irrespectively of which construction method is considered in the future as the area is necessary to allow for the construction to occur<sup>2</sup>*

- 5.19 Mr Busnardo’s evidence also states:

*In relation to the retaining wall instead of embankment, from a route protection perspective, retaining walls are generally designed in response to localised constraints such as significant ecological areas, natural hazards, and stormwater as opposed to reducing the area of land required. If we included retaining walls now, then we would be defining an engineering solution at such an early design phase without knowing the future land use. Committing to provision of a retaining wall now could reduce the flexibility to integrate with adjacent land in the future. Generally, retaining walls cost more than embankments and based on the existing environment, an embankment would be the most appropriate treatment. Ultimately, there is an opportunity to add retaining walls at the detailed design phase in the future when there is more certainty on the adjacent land use.<sup>3</sup>*

- 5.20 Another SGA engineering witness, Mr Mason, states:

*At this stage, the final earthworks levels of any adjoining future development are unknown, and the actual ground profile and detailed site geology will not be known until the time of implementation when appropriate site investigations are undertaken. Integration of the Project with proposed developments will be managed through the establishment of the Land Use Integration Process (LIP) ..., s176/178 approvals ... and preparation of the Urban and Landscape Design Management Plan (ULDMP) .... Therefore, I consider that the appropriate form of interface is best assessed at the time of implementation when the preliminary design is carried out. This may be through provision of retaining walls rather than earthworks embankments, although this will require consideration of the potential cost*

<sup>2</sup> Primary Statement of Evidence, Bruno Busnardo, Engineering and Design, 24 January 2024, paragraph 89

<sup>3</sup> Ibid, paragraph 140.

*implications. At the time of implementation, there is an opportunity to work with landowners to minimise the extent of impact on existing properties.*<sup>4</sup>

5.21 Mr Mason also states:

*Provision of a retaining wall will require an area for construction so the extent of the designation may not reduce significantly. Further, the final designation boundary could not be drawn back as far if a retaining wall were provided due to the need to accommodate the wall within the designation, as well as accommodate maintenance requirements, ultimately having greater impact on the adjacent property and reducing the ability to integrate with adjacent land.*

*There may be opportunities to steepen a back berm rather than forming a small embankment into private land or constructing a retaining wall. Alternatively, development of adjacent land may also provide alternative design opportunities for integration. At the time of implementation, there is an opportunity to work with landowners on an appropriate design solution when there is greater certainty with regard to the detailed design and the future land use. This may be through provision of retaining walls rather than earthworks embankments, although this will require consideration of the potential cost implications.*<sup>5</sup>

5.22 I note that a larger permanent designation to provide for maintenance of a wall is a possible outcome which may vary from site to site

### **Closure of Slippery Creek Bridge (NoR 1) and Alfriston Road Bridge (NoR 3)**

5.23 Some planning-related requests for information are also relevant to transport matters.

5.24 AT was requested (P13) to explain how ATE recommendations to maintain access across Slippery Creek and the Southern Motorway at Alfriston Road are addressed in the proposed conditions. AT responded:

*The proposed conditions including the Construction Traffic Management Plan (CTMP) condition are intentionally phrased to be outcomes focused, recognising the longer implementation timeframes. The outcomes sought by the prescriptive and specific recommendations made in the TAR are provided for and addressed in the proposed conditions as a whole. ...*

5.25 I address these matters in Section 9.

## **6 Transport Environment**

6.1 As explained in the notified material, the Projects are not expected to be implemented in the short or medium term, although it is possible that some parts of some Projects may be implemented earlier if funding is provided. As a result, the receiving environment for the Projects is expected to be significantly different to the current environment in some areas but could be similar in other areas where significant growth is not planned.

6.2 While the designations sought by the NoRs will be effective immediately, they are not expected to have any significant effect on how the transport network operates until construction work begins. Construction could occur in stages over a number of years depending on how funding is prioritised.

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<sup>4</sup> Primary Statement of Evidence, Rob Mason, Engineering and Design, 24 January 2024, paragraph 8

<sup>5</sup> Ibid, paragraphs 59, 60.

- 6.3 The existing environment in the vicinity of each Project is well described in the notified material. The studies and material informing the background and development of the Projects reflects the growth planning set out in FULSS and the DOSP.
- 6.4 Since the FULSS and DOSP were prepared changes such as the Medium Density Residential Standard (**MDRS**) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, the intensification requirements of the National Policy Statement on Urban Development 2020 (May 2022) (**NPS-UD**) and the notification of proposed Plan Change 78 (**PC78**) in August 2022 have occurred. Those changes have influenced the FDS.
- 6.5 The MDRS, NPS-US, PC78 and FDS all pre-date lodgement of the NoR; however the analysis underpinning the ATE was undertaken using the earlier FULSS growth projections.
- 6.6 The response of Council to the Government announcement the MDRS is to be made optional and the potential for amendments to PC78 are unknown at the time of writing.

### **Future Transport Network**

- 6.7 The DOSP, published in August 2019, proposed a future transport network that included the Mill Road corridor, that the DOSP described as “an additional strategic north-south corridor”, and a new north-south arterial broadly parallel to and west of the NIMT railway linking Drury and Opāheke.

### **Mill Road**

- 6.8 The NZTA website provides a description of the Mill Road project, noting that in June 2021 the Government requested the project be rescoped. The Auckland RLTP describes the change as “scaled down”<sup>6</sup>. The project, now referred to as Manukau to Takanini Access and Safety (**MTAS**) project, has been the subject of a business case presented for ministerial approval in August 2023.
- 6.9 The Auckland Regional Land Transport Plan 2021-2031 (RLTP) sets out the allocation of funding to transport projects in the region. With respect to Mill Road the RLTP states:
 

*Mill Road safety improvements and local infrastructure investment in Drury network: This project, funded through the NZUP, is expected to involve a two-lane upgrade of Mill Road between Flat Bush and Alfriston, tying into the existing urban Redoubt Road dynamic lanes. There will also be targeted safety improvements between Alfriston and Papakura, and transport upgrades to release housing and local centres in Drury in a way that supports decarbonisation objectives.*<sup>7</sup>
- 6.10 The RLTP notes the MTAS project has a projected 10-year capital expenditure of \$874 million with a footnote reading “The costs for this package of works are not baselined and further work is required to understand scope, schedule and cost.”<sup>8</sup>
- 6.11 The NZTA website states:
 

*The previous proposals for the full Mill Road corridor, which is not proceeding through the New Zealand Upgrade Programme (NZUP), remains part of the South Auckland strategic transport network endorsed as part of the Auckland Transport Alignment Project (ATAP).*

<sup>6</sup> Auckland Regional Land Transport Plan 2021-2031, page 125

<sup>7</sup> *ibid*, page 66

<sup>8</sup> *ibid*, pg 96

*Long term route protection remains a consideration but would be dependent on funding availability through sources other than NZUP.*<sup>9</sup>

6.12 In a submission dated 25 May 2023 to a Ministry of Education NoR NZTA stated:

*The NoR is located adjacent to the Manukau to Takaanini Access and Safety (MTAS) project (formerly known as 'Mill Road') which forms part of the South Auckland Package which is funded under the New Zealand Upgrade Programme. ... the scope of this project cannot be confirmed until the business case is approved and funding allocated ...*<sup>10</sup>

6.13 In a statement on the same NoR dated 22 September 2023, NZTA stated:

*Waka Kotahi is unable to provide further information on the Manukau to Takaanini Access and Safety (MTAS) project as the business case has not yet been approved by the Ministers.*<sup>11</sup>

6.14 Given the funding allocation in the RLTP provision of a “scaled down” Mill Road, to use the RLTP language, may occur prior to 2041; however, given the recent statements by NZTA and the footnote in the RLTP that is not certain.

### **North-South Arterial**

6.15 The DOSP expected the future arterial road network would include a “New north-south arterial between Papakura industrial area and Waihoehoe Road”. The transport assessment that informed the DOSP referred to the road as IBC AR10<sup>12</sup> and stated:

*The Papakura section and section between Papakura and Waihoehoe Road will likely be a later priority, particularly in the event that the north-south arterials in the Opāheke/ Drury East area add further north-south capacity and provide for development access.*<sup>13</sup>

6.16 The new arterial is not explicitly mentioned in the RLTP. A “Drury Local Road Improvements” project is listed as having pre-committed funding for in the “Pre-implementation” phase with a total 2021-2031 cost of \$1,750,000,<sup>14</sup> but I suspect that project does not include the new arterial due to the use of the words “local road” and “improvements” in the title.

6.17 The RLTP also provides a list of projects that were considered but were unfunded, and this includes \$1.45 billion for the Drury Local Road Improvements project and \$135 million for Additional Growth Projects – South.

6.18 Based on the information I have viewed the timing for this arterial is not certain.

### **Norrie Road Bridge**

6.19 The ATE states “*The Norrie Road bridge is expected to be upgraded to a two-lane bridge by 2038 as part of wider South Auckland works.*”<sup>15</sup> The Norrie Road bridge is not explicitly mentioned in the DOSP, the Southern ITA that informed the DOSP. The project is also not included in the RLTP 2021-31. I request AT provide additional information on this project including the funding status and any update on expected timing.

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<sup>9</sup> <https://www.nzta.govt.nz/planning-and-investment/nz-upgrade/nzup-regional-projects/auckland-package/nzup-south-auckland-projects/mill-road/>

<sup>10</sup> Submission on Notice of Requirement – 121 Murphys Road, Flat Bush, NZTA, 25 May 2023

<sup>11</sup> Hearing statement for Notice of Requirement – 121 Murphys Road, Flat Bush, NZTA, 22 September 2023

<sup>12</sup> Southern Integrated Transport Assessment, Supporting Growth, April 2019, page x

<sup>13</sup> Ibid, page 119

<sup>14</sup> RLTP, page 111

<sup>15</sup> ATE, page 78



## Future Development Strategy

- 6.20 The FDS removed some future urban areas that were included in FULSS including areas in Takanini and in Drury. The FDS also red flagged other development areas where special attention to flood risk must be considered, and this included areas in Takanini and Drury.
- 6.21 I understand red flagging of an area does not mean it cannot be developed, but that planning and development is subject to further stormwater management planning. I expect that may result in less intensive development than anticipated by FULSS.
- 6.22 In Takanini, the southern half of the previous growth area including land on either side of Popes Road has been removed, and the northern area extending to Alfriston Road and beyond is red flagged and deferred. The only unrestricted growth area remaining in Takanini is the Cosgrave Road area which has been deferred significantly.
- 6.23 In the Drury-Opāheke area some areas in Drury East have been removed, and Opāheke has been red flagged and deferred significantly. Some areas of Drury East are scheduled for development beyond 2035, as are the Drury West areas not currently live-zoned.
- 6.24 The FDS lists major public transport and active mode projects by decade. The South FTN projects are not included in the major projects list, but two are listed as pre-requisites for development of growth areas (as identified in Table 3 below).
- 6.25 The FDS lists timing and infrastructure prerequisites for identified future urban areas, including those summarised in Table 3 below, where only transport infrastructure is listed, and the Projects are shown in bold. NoR 2 (part of the Great South Road Upgrade) is not required before 2035. NoR 3 (Takanini FTN Upgrade) is not required before 2050.

*Table 3: FDS Future Urban Areas, Timing and Transport Infrastructure Prerequisites<sup>16</sup>*

Staging	Timing	Infrastructure Prerequisite
<b>Takanini</b>		
Cosgrave Rd	Not before 2050+ (was 2023-2027)	Mill Road, <b>Takanini FTN Upgrade</b>
Takanini (red-flagged)	Not before 2050+ (was 2043-2047)	Mill Road, <b>Takanini FTN Upgrade</b>
<b>Opāheke</b>		
Opāheke (red-flagged)	Not before 2050+ (was 2028-2032)	Mill Road
<b>Drury</b>		
Drury East (part red-flagged)	Not before 2035+	Drury Arterials. Drury Railway Station, Papakura-Pukekohe Rail Electrification
Drury West Stage 1	Not before 2035+ (was 2018-2022)	SH22 Upgrade, Drury Arterials. Ngākōroa Railway Station, Papakura-Pukekohe Rail Electrification
Drury West Stage 2	Not before 2035+ (was 2028-2032)	SH22 Upgrade, Drury Arterials. Ngākōroa Railway Station, Papakura-Pukekohe Rail Electrification
Drury West Stage 3	Not before 2035+	SH22 Upgrade, Drury Arterials. Ngākōroa Railway Station, SH1 Drury South Interchange, Drury West and South Drury Connection, <b>Great South Road Upgrade</b>

- 6.26 There have been significant reductions in the development areas, and I expect the red flagging of significant areas could result in less intensive development in those areas. Most

<sup>16</sup> Extract from Auckland Future Development Strategy Appendix 6 (Auckland Council Planning Environment and Parks Committee Minutes 2 November 2023 Version)

areas have been deferred, some significantly. These changes are likely to result in some of the projects, or some parts of them, not being required as soon as originally expected.

## 7 Assessment of Alternatives

- 7.1 The RMA provides for a RA to designate “for a project or work; or in respect of any land ... where a restriction is **reasonably necessary** for the safe or efficient functioning or operation of such a project or work”<sup>17</sup>.
- 7.2 As the Hearing Panel will be well aware, it must consider the effects having particular regard to four areas, two of which are :
- (b) *whether adequate consideration has been given to alternative sites, routes, or methods of undertaking the work if ...*
  - (c) *whether the work and designation are reasonably necessary for achieving the objectives of the requiring authority for which the designation is sought; and*
- 7.3 The notification material, and chiefly the AOA document, describe the process taken to consider a wide range of alternative means and methods of achieving the objectives. In general the process considered a broad range of alternative routes and forms and evaluated each against various criteria.
- 7.4 In my view most of the Projects, or at least projects very much like them, were reasonably necessary to provide for the growth forecasts reflected in FULSS in the sub-region at the macro scale.
- 7.5 To the extent that the FDS and future investigations into the feasibility of developing the red flagged areas may delay or reduce the quantum of growth in the sub-region, the need for some of the Projects may be delayed, and in some cases some of the proposed Projects may no longer be reasonably necessary.
- 7.6 I am also of the view that alternative sites, routes, and methods have been well considered at the macro scale. I would therefore agree that the introduction of bus lanes along Great South Road, for example, is reasonably necessary when considered together with the other Projects, and that a range of alternatives to such lanes have been considered. As noted above, the Notices do not require AT to provide bus lanes, but do enable them.
- 7.7 What may be less certain is the adequacy of consideration given to alternative methods of undertaking the work and how reasonably necessary every individual part of every piece of land to be restricted is at the micro scale.
- 7.8 The notified material includes several sets of drawings including the GA and UDE drawings. All drawings are based on initial concept designs, and as noted earlier the implemented project may differ from the concept design. My understanding is that detailed design matters such as determining the exact location of any particular element or choosing different methods of construction such as a batter slope or a retaining wall have not yet been made and are intended to be made at the OP stage when detailed designs have been completed, within the constraint of being in general accordance with the Concept Drawings included with the conditions.
- 7.9 As a result, in some locations there may be opportunities to consider an alternative method of undertaking the work in order to reduce effects, potentially including the area of land required. There may be locations and properties where consideration of alternative methods could result in refinement of the Project footprint now, and other locations where it may be premature to refine or restrict the range of methods at this time.

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<sup>17</sup> S168 (2) Resource Management Act 1991

- 7.10 The proposed requirements for land also include land required for the construction, operation and maintenance of the Projects. When construction is complete it may be possible to reduce the area of land required. This is commonly done for other road infrastructure projects, and it is expected to occur for these Projects after construction is complete.
- 7.11 Some NoRs make a distinction between areas required permanently and areas required only for construction, but in each case I have been involved with the design had progressed to a more detailed stage and implementation was imminent. Given the route protection intention and the early concept level of design the absence of a distinction between the permanent and temporary occupation extents is understandable and, in my view, appropriate in this case.
- 7.12 Where access to properties is or may be affected by a Project I understand the design work and the AOA has not considered a range of options for how access to all properties may be managed. Access to properties is considered in more detail below.
- 7.13 There is no discussion in the notification material about other design decisions, such as considering the alternatives of an on-road cycle lane versus an off-road cycle path, or a shared path for both pedestrians and cyclists versus two separate paths. The GA concept designs prepared to support the notices either adopt the current AT design standard or defer the decision to the detailed design and OP stage, noting that the Notices enable but do not require the provision of cycle paths.
- 7.14 At this preliminary stage that may be an appropriate response as design standards change over time; however, there are some aspects of these design decisions that may be less suited to some environments.
- 7.15 For example, where cyclists are travelling close to the road boundary and cross driveways the provision of appropriate visibility between cyclists and drivers of vehicles leaving properties is an important factor for safety. This is often addressed by restricting or prohibiting driveways across such paths, increasing the distance between the path and the boundary (to somewhere in the order of 5-8m), reducing the speed of cyclists, or imposing controls on boundary fencing or planting. Some of those measures could increase the designation footprint or affect property owners. None of the concept designs or assessments include these measures.
- 7.16 I have significant concerns around the safety of the proposed cycle paths where they cross driveways, and this is most significant where paths are provided in urban areas with a higher frequency of driveways.
- 7.17 In other cases where the volume of pedestrians and cyclists is likely to be lower the use of a single shared path for both cyclists and pedestrians may be acceptable and could result in less land being required.
- 7.18 Ultimately, the provision of a sufficiently safe and effective transport environment, including cycling facilities, is the responsibility of the RAs, however the assessment of likely effects and the reasonable necessity for the extent of land required are squarely within the scope of this process. For those reasons I request the RAs provide additional information on these points at the hearing.
- 7.19 All of the Projects involve the permanent removal of on-street parking, and some involve the temporary or permanent removal of off-street parking. The ATE considers there is likely to be sufficient supplies of parking in other locations, such as side roads, to address this. No data on side-road parking supply has been provided and no alternative methods of replacing or otherwise addressing the effects of loss of parking have been considered.

## 8 Operational Transport Effects and Management Methods

### Scope of this Report

- 8.1 This report has been prepared on the basis that its primary function is to assist the reporting planner and the hearings panel to understand the likely transport-related effects of the projects, and to assist with their decision making with respect to the key matters of the assessment of alternatives, and if each project is reasonably necessary.
- 8.2 In considering the assessment of alternatives I note that the RA is not required to have undertaken an exhaustive assessment of every possible alternative and is not required to have selected the “best” alternative.
- 8.3 This report is not a design review or a safety audit and does not address the adequacy or suitability of the proposed designs, except where this is likely to impact on the effects or where relevant to submissions.
- 8.4 When considering the impact of the Notices, there are also a range of potential effects that could be generated without a designation. For example, a median island could be installed at an existing intersection to improve safety at the expense of additional journey length for properties that no longer have right turn movements available.
- 8.5 In a similar manner, AT may undertake maintenance and construction work within the road reserve, and in some cases the effects arising from this already-enabled work may be similar to the effects generated during construction of some parts of the Projects. This report attempts to consider the operational and construction-related effects of the Projects bearing those already-enabled effects in mind.

### All Projects

- 8.6 In general the methodology and techniques used for assessing the operational effects as presented in the notified material are considered to be appropriate and adequate; however, there are some points to be aware of.

#### Purpose

- 8.7 The Form 18 for each NoR sets out the purpose and objectives for each Project. The purpose and objectives are not repeated here but are important when considering the need for each project and the sites, routes, and methods for the work, as the Purpose and the Concept Design are the matters to be considered at the OP stage.

#### **Design**

- 8.8 As explained in the ATE the assessment of the Projects is aimed at route protection for longer-term projects and some aspects of the receiving environment and the design are not yet certain.
- 8.9 The ATE explains that as part of this approach the assessment uses “*generic cross-sections and design standards*”<sup>18</sup> and focuses “*more on desired outcomes and footprints*.”<sup>19</sup> Generic design standards invariably include desirable dimensions, or at least desirable minimums rather than absolute minimum values. In many cases a non-compliant design may still provide appropriate service.

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<sup>18</sup> Section 3.2.1, ATE

<sup>19</sup> Section 3.2.2.3, ATE.

- 8.10 It is preferable that Projects are implemented to a reasonable standard, although there may be opportunities to reduce impacts and effects in some locations through judicious adjustment of design parameters. That would be a normal aspect of the detailed design phase, but some of those decisions could appropriately be made now.
- 8.11 For example, the notified material shows an indicative form of intersection control, such as Give Way, roundabout, or traffic signals. While the form shown in the concept designs is probably the most likely to be adopted, the various trade-offs between those choices may result in a different decision being made prior to construction. As detailed below the choice of intersection control in particular may have a significant impact on some effects.
- 8.12 The Hearing Panel may wish to consider how the stated “desired outcomes” relate to the “alternative methods” and “reasonably necessary” matters at a more detailed level when considering submissions.

### **Operation**

- 8.13 As noted in the notified material, some of the Projects involve widening parts of the road corridor to facilitate the introduction of additional lane(s) intended and expected to be used as special lanes in peak-periods. These lanes could potentially be operated as bus-only lanes, transit (T2 or T3) lanes, and include freight vehicles. The hours of operation of these lanes could vary.
- 8.14 The SGA response to the s.92 RFI (see paragraph 5.11) confirms the extent of bus lanes recommended for the network is shown on the drawings appended to the UDE, noting the drawings include parts of road where no additional land is required.
- 8.15 The additional information response (see paragraph 5.11) also confirms that decisions around where and when bus lanes will be implemented will be made in the future in the interests of achieving a level of service for bus services. If appropriate levels of service for bus services can be achieved without bus lanes, because for example there is less traffic congestion than forecast, the additional road space would not be required at that time.
- 8.16 It is therefore important to note that the need for some parts of some Projects is dependant on development and growth in travel demand occurring as forecast, and that while some drawings show bus lanes the management of any lane is subject to AT’s discretion and may change over time. As notified there is no obligation for AT to provide bus lanes, despite the benefits of such lanes are relied on when justifying the need for the Projects.

### **Management of Effects**

- 8.17 Given the longer timeframes and inherent uncertainties around what the receiving environment or the design will look like at the time of implementation, the material relies heavily on management plans to manage effects. In that situation the deferral of effects management to future management plans may be the most practicable option but it is essential that the conditions which govern the preparation and implementation of those plans have a relatively broad scope and are robust. I return to the conditions around management plans later.

### **Integration of Transport and Land Use**

#### Overall Growth

- 8.18 The ATE explains that a key element of the assessment is the environment against which the effects are assessed. It acknowledges the relationship between the Projects and the growth

they are intended to support, and that the Projects are “*unlikely to occur without such development*”<sup>20</sup>.

- 8.19 The assessment material evaluates the benefits of the Projects assuming that all development would occur with or without the Projects. In my view much of the development is unlikely to occur without the Projects, which has not been accounted for in the ATE benefits analysis, although the interplay is acknowledged. This dependency of growth on the projects is reinforced by the FDS which makes the Projects prerequisites for growth in some areas as shown in Table 3, has removed some growth areas, and has red flagged others.
- 8.20 This interplay is not unexpected given the desire to integrate land use and transport is a common theme in growth strategies and plans and it may be difficult, and undesirable, to try and separate the two. It is now relatively common for plan changes to rezone land for development to connect the provision of infrastructure with various levels of development, and I expect future plan changes could place some restrictions on the scale of development until specific parts of some of the Projects are operational.
- 8.21 I do not consider it appropriate or necessary to assess the effects or effectiveness of the Projects against what could be a nearly infinite number of possible development scenarios, but it is useful to remember that the benefits attributed to the Projects may not all occur unless all of the planned growth also occurs. On the other hand, if some of the growth does not occur some of the adverse effects may also not occur.

#### **Assessment of Operational Effects**

- 8.22 The assessment of effects from the operation of the Projects has been informed by computer modelling. As noted in the ATE the modelling has compared the effects of all FULSS growth occurring without any of the Projects in place against all FULSS growth occurring with all of the Projects in place.
- 8.23 From my examination of the projects I consider it is also possible, or even likely, that individual Projects may be delivered in stages. As always, it is possible that some parts of some Projects, or indeed whole Projects, may not be delivered in parallel with the planned growth, or may not be delivered at all. That could occur for a variety of reasons including growth occurring in an unexpected manner or changing funding priorities.
- 8.24 In the event that some parts of one or more other projects in the area (e.g. one of the Takanini Level Crossing projects) are not implemented as currently envisaged it is possible that the full range of benefits attributed to the South FTN Projects may not be realised. It is also plausible that some parts of some other projects may not operate as efficiently without parts of the South FTN network in place and that the benefits of those projects may not be fully realised unless and until those other projects are completed.
- 8.25 This is not a criticism of the methodology adopted by SGA and it is not necessary or appropriate to model each part of each Project separately, but the potential for the benefits to be less than expected in a partial implementation situation should be understood. Given the Projects have been considered as a whole, it is also possible that one Project, or one part of one Project is not (as) beneficial on a stand-alone basis.
- 8.26 The transport models used to inform the assessment include using the regional MSM model which is based on land use forecasts which in turn are based on regional population forecasts produced by Statistics New Zealand. The models represent the planned FULSS land use pattern, such as those shown in the DOSP. As land is not always zoned in accordance with those expectations there may be some differences between the forecasts and the actual land use pattern.

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<sup>20</sup> Section 3.2.1, ATE

- 8.27 I understand the models used for the assessment were the most current available at the time, but do not reflect potential intensification of existing urban areas. Such intensification may assist in slowing down the demand for development of greenfield areas, so there may be some more localised differences. The models also did not represent the FDS growth pattern as that was not available when that work was undertaken.

### **Road Safety**

- 8.28 The assessment of the effects on road safety has considered the recent crash history in the area and how the design standards align with a harm-minimisation approach which focusses most heavily on reducing deaths and serious injuries (**DSIs**) from crashes.
- 8.29 The ATE presents a summary of crashes on selected routes in the study area over the five-year period 2018-2022. I expect the Covid-19 Health Orders and the residual effects on working and travel patterns are likely to have contributed to a reduction in total crashes during 2021 and 2022.
- 8.30 The ATE states “...as growth occurs, trips will increase which in turn will increase exposure and risk. Thus, without intervention, the safety risks will only be exacerbated further.”<sup>21</sup>
- 8.31 If the Projects are not confirmed, or if their implementation is delayed, I would not expect the existing transport environment to remain the same. I expect AT would address the increased crash risk by other means.
- 8.32 Some of the projects involve the removal of flush medians. Flush medians provide a number of safety benefits for vehicles turning in and out of side roads and driveways, and for pedestrians crossing the road. The removal of flush medians is expected to result in a reduction in safety for turning movements, including rear-end crashes where vehicles waiting to turn right into a side road or driveway are struck by a following vehicle.
- 8.33 I have safety concerns about the proposed cycle paths as outlined below.

### **Active Modes**

- 8.34 The ATE provides a description of the existing active mode (walking and cycling) facilities in the area. As expected, most of the roads have no dedicated facilities where they are located in a rural environment.
- 8.35 Figure 3-9 of the ATE shows maps of the existing walking network and deficiencies sourced from AT Future Connect (AT’s Network Plan). The “*Walking Deficiency Indicator*” map shows deficiencies in the existing walking network, and these may include a footpath that is narrower than the current standard width or paths along a busy road where there are few pedestrian crossing facilities. Many of the footpaths present in the network would have been constructed prior to Auckland Transport adopting the current standard 1.8m width, so would show on the map as being deficient even if in good condition.
- 8.36 There are several cycle facilities in the area including shared paths on Alfriston Road and parts of Great South Road and a mix of facilities on Porchester Road.
- 8.37 The low population density in the Popes Road and some of the Porchester Road areas would generally result in low and dispersed demand for walking and cycling, but as development occurs and the population density increases the demand for walking and cycling would increase. The FDS has removed growth from these areas that was previously included in FULSS.
- 8.38 As land in the area is urbanised it is expected that footpaths would be constructed by subdivision developers on both sides of every new or widened road, and that cycle facilities

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<sup>21</sup> Section 3.5.5, ATE.

would be constructed on both sides of every new or widened collector or arterial road. In some locations additional facilities, such as paths beside streams or through reserves may also be added. As a result, as the rural areas develop active mode connectivity within each area is expected to be excellent. As noted above the areas around Popes Road and Porchester Road are no longer expected to be urbanised.

- 8.39 Active mode facilities along the Project corridors are part of the expected road form for all new or upgraded arterial roads in urban areas. The GA design for each Project includes walking and cycling facilities although they are not specified in the Concept Drawings.

#### Cycle Path Safety Concerns

- 8.40 The Projects propose the installation of cycle paths along both sides of the road on all Project sections. These paths are located between the footpath and the edge of the general traffic carriageway, usually with a grassed separator strip (berm) between the path and the road. In the existing urban areas, particularly along Great South Road and Alfriston Road, the paths are crossed by numerous driveways.
- 8.41 As a cycle path is provided on both sides of the road they are intended to be used by cyclists travelling in the same direction as the adjacent traffic (i.e. a uni-directional path), but unlike a standard on-road cycle lane cyclists are permitted to travel in both directions along any cycle path, so I would expect some bi-directional use even where paths are provided on both sides of the road, particularly if that allows a cyclist to avoid crossing a road.
- 8.42 Moving cyclists from an arterial road carriageway to an off-road path can result in significant improvements to cyclist safety as a result of increased distance between the cyclists and motor vehicles resulting in fewer collisions. This is offset to some degree by an increase in crash risk where a cycle path crosses driveways. The risks at driveways are higher where:
- a) the cycle path is relatively close to the property boundary and sight lines between cyclists and drivers are constrained by boundary treatments such as fences and planting;
  - b) the path is a bi-directional one (can be used by cyclists travelling in either direction);
  - c) the speed of cyclists is higher;
  - d) the speed of driveway vehicles is higher;
  - e) there are more driveways; and
  - f) there are more cyclists.
- 8.43 New Zealand research has shown 14% of cyclist crashes in urban areas occur at driveways<sup>22</sup>. One well-respected New Zealand practitioner has stated<sup>23</sup>:

*Well-designed cycle paths can be safe and pleasant for cycling.*

*Having said that, many existing cycle paths in New Zealand fall far short of the required design "best practice", and potentially put cyclists at risk. Simply put, a good cycle path has no driveways crossing it unless there is ample unimpeded visibility between driveway users and the path. In practice, **this means that a cycle path must be separated from the boundary (from where driveways emerge) by at least 7 m.** Where a cycle path is close to the boundary, cyclists are unable to stop in time to avoid hitting (or being hit by) a car emerging from a driveway.*

- 8.44 The national NZTA Cycle Network Guidance (CNG) states<sup>24</sup>:

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<sup>22</sup> Pg 107. National Cycle Facility Design Guidance Best Practice Review, Abley and Via Strada, July 2015.

<sup>23</sup> The Case Against Cycle Paths, Macbeth AG, Proceedings of the New Zealand Cycling Conference, October 2003.



*As for two-way separated cycleways, shared paths adjacent to roads involve hazards for cyclists at driveways, particularly those travelling in the direction opposite to that of traffic on the adjacent lane.*

8.45 An NZTA Technical Note states:

*While separated cycleways feel safer and have been proven to be safer between intersections and driveways, they are generally less safe at intersections and driveways, which are the locations where the risk is highest overall. **It is crucial that this risk is mitigated through good design.***

*Cycling in the contraflow direction is more hazardous for separated cycleways at driveways, especially for cycleways located close to the roadway, where drivers base their expectations for cyclists' direction of travel on the adjacent traffic lane.<sup>25</sup>*

8.46 The CNG also refers to Australasian design guidelines which recommend that one-way paths have limited driveway crossings (preferably fewer than 1 per 100m), and<sup>26</sup>:

*In urban arterial road related areas it is recommended that where practicable paths are to be located with adequate clearance from both road traffic and the property line so that adequate sight distance is achieved for vehicles and pedestrians leaving driveways and gateways.*

8.47 The Christchurch Cycle Design Guideline states<sup>27</sup>:

*Preferred location for this facility is when the path only has to cross a limited number of intersections and driveways. Consideration is to be given to the buffer distance from the driveway, intervisibility between pathway users and drivers entering/exiting, fence and boundary vegetation heights, the layout and locations of buildings, including auxiliary buildings such as garages, high volume driveways and density of land use.*

8.48 The Auckland Transport Design Manual (TDM) sets out some requirements for cycle paths:

- a) The TDM considers it imperative that driveway entrances are minimised, that driveways show priority for the paths, and that speeds are reduced.
- b) **“Visibility splays must be provided suitable for the operating speed of the cycleway, from a vehicle stopped clear of the cycle way”**
- c) **“Vehicle crossings to multiple residential properties may require a speed control measure such as a ramp up to the vehicle crossing at the property boundary in addition to the visibility splay.”**
- d) **“Where cycle facilities cross commercial driveways “green dashed” markings should be used to raise awareness of people on bikes.”**

8.49 Australian/ New Zealand Standard 2890.1 Parking facilities – Off-street car parking is currently being finalised after receiving public comments on the draft version. The draft includes standard for visibility at driveways where they cross paths which was based on Australian state guidelines and NZTA guidance currently in development. For this type of path the standard (when published) will require a visibility triangle 5m along the driveway from the edge of the path and at least 12m along the cycle path in each direction as shown in the following figure taken from the draft standard.

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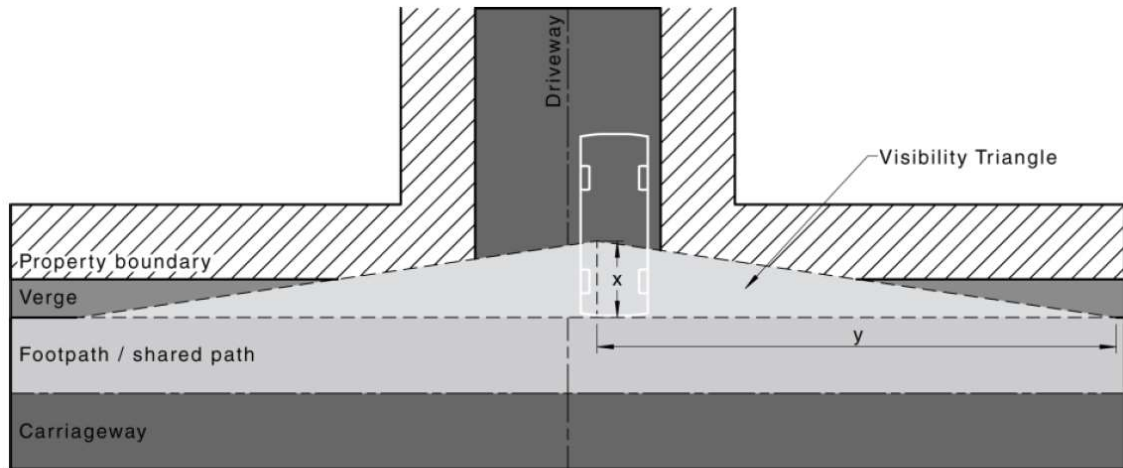
<sup>24</sup> <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/cycle-network-and-route-planning-guide/principles/cycle-route-components-between-intersections/#shared-paths>

<sup>25</sup> Technical Note TN002: Updated guidance on separated cycleways at side roads and driveways, NZTA, 2020.

<sup>26</sup> Page 36, Guide to Road Design Part 6A: Paths for Walking and Cycling, Austroads, 2017.

<sup>27</sup> Pg 2, Christchurch Cycle Design Guidelines, Christchurch City Council, 2016.

Figure 1: Visibility triangle at driveways<sup>28</sup>



Where:

X = Distance along driveway from edge of path in meters

Y = Distance along path from driveway in meters

**Figure 3.2 Illustration of sight distances to path users**

- 8.50 In greenfield development areas Auckland Unitary Plan Precinct Provisions are often included, often at the request of Auckland Transport, and these can include the provision of cycle paths on all new collector or arterial roads, with no property access allowed across a path. As an example, the following standard applies in the Warkworth North Precinct:

1553.6.4. Standards for vehicle access to Western Link Road and roads with separated cycleways or shared paths

Purpose:

- To ensure the safety of cyclists and pedestrians and facilitate public transport.

- (1) Sites that front onto the Western Link Road or roads with separated cycleways or 3m shared path (pedestrian/ cycle) must not have direct vehicle access to the road and must be provided with access from rear lanes (access lots) or side roads at the time of subdivision.

- 8.51 Where land is already zoned for development and redevelopment is occurring Council and Auckland Transport may have the ability to address matters such as visibility at driveways where an activity requires resource consent (and this is a matter of discretion). There is limited or no opportunity to address this for other activities.
- 8.52 I have previously raised the same issue in relation to the Pukekohe Transport Network NoRs, particularly for one of the projects where a bi-directional path is proposed. SGA have now provided primary evidence for the hearing on those Notices which responds to my safety concerns. At the time of writing, submitter evidence for the Pukekohe NoRs has not been received, expert conferencing has not been undertaken, and the matter has not been heard. I would expect more information to be available from the Pukekohe process by the time this matter is heard and I can provide an update to the NoR Hearing.
- 8.53 The SGA transport planning and engineering witnesses in the Pukekohe Transport Network NoRs have acknowledged the safety concern I have raised but are of the view the proposed cycle paths provide a net safety benefit despite the driveway risks and are of the view that the NoR footprint and conditions allow a safe path to be provided. Reasons for that view include:

<sup>28</sup> DR AS/NZS 2890.1:202X Figure 3.2, Standards Australia, Sydney, 2023.

- a) The existing footpaths already operate as informal bi-directional cycle facilities for inexperienced cyclists, so much of the risk at driveways is already present, and the proposed cycle path will be safer than the footpath<sup>29</sup>;
- b) Most crashes involving cyclists do not occur at driveways so the risk of cyclists mixing with other vehicles is greater than the risk of crashes at driveways, that about 10 percent of crashes involved parked cars, and those risks would reduce significantly where a separated path is provided<sup>30</sup>;
- c) The AT Transport Design Manual shows a separated cycle path is the appropriate type of facility where the traffic volume on the road exceeds 5,000 vehicles per day<sup>31</sup>;
- d) The CycleRAP cycle facility safety assessment tool<sup>32</sup> shows an off-road cycle path is safer than cyclists using the road with other traffic<sup>33</sup>.
- e) A cyclist is more likely to survive a collision with a vehicle exiting a driveway than with a vehicle travelling along the road due to the higher speed differential on the road<sup>34</sup>.
- f) A distance of at least 3.0m between the cycle path and the road boundary would be sufficient for a vehicle to pull out of a driveway, stop clear of the cycle path and look for cyclists. The Pukekohe NoR 6 Project provides a total berm width of 6.8m which is considered sufficient to provide for an appropriate offset from the boundary.

8.54 My response to those points is:

- a) I do not place much weight on the argument that cyclists are using the existing footpaths as that is currently unlawful (unless the path is a formal shared path) and inexperienced cyclists using the footpath are likely to be travelling at lower speed than cyclists on a separated off-road cycle path (because they are less experienced, the path is narrower, and pedestrians are present). In addition I expect some experienced cyclists would prefer to remain on the road rather than use the off-road path;
- b) As noted above, the AT Transport Design Manual and other guidelines consider that the provision of visibility splays on cycle paths is essential. Those splays cannot currently be assured for these projects;
- c) In conditions typical for these projects the CycleRAP tool scores all types of off-road cycling facility as safer than any form of on-road facility; however, I would expect the model to assume that any cycling facility is well-designed, which would include the provision of adequate visibility at driveways and an adequate offset from the boundary. The CycleRAP tool does not have an input to allow for poor visibility at driveways;
- d) I agree the severity of a typical driveway collision is likely to be less than a typical on-road collision.
- e) With a separation distance of 3.0m there is still a significant risk that a cyclist travelling at speed along a cycle path would not be able to stop before colliding with a vehicle exiting a driveway, and a 3.0m separation distance is still significantly narrower than the distance recommended in any standard or guideline. In some cases the total berm width for these Projects is less than the 6.8m available in the Pukekohe case. No diagrams showing the visibility arrangements in some of the worst-case scenarios have been provided.

<sup>29</sup> Pukekohe Transport Network Notices of Requirement, Primary Evidence of Rob Mason, paragraph 74

<sup>30</sup> Ibid, paragraph 78

<sup>31</sup> Ibid, para 79

<sup>32</sup> A demonstrator version is available at <https://irap.org/cyclerap/demonstrator/>

<sup>33</sup> Rob Mason, paragraph 81

<sup>34</sup> Ibid, para 84.

8.55 It is possible that a different design would enable a cycle facility with improved safety. Possible options include a protected cycle lane (shown below) within or at the edge of the carriageway (a form of facility not included in the CycleRAP tool but used in other locations such as Nelson Street), a Copenhagen-style path (as shown below, where the cycle facility is raised with a low kerb adjacent to the road lanes), increased separation between the cycle path and the road boundary, or the setting back of property boundaries at driveways to ensure appropriate visibility triangles are provided. I expect some or all of those options may require a different or expanded designation footprint in some locations.

Figure 2: A bi-directional protected cycle lane in Beach Road Auckland [nzta.govt.nz]



Figure 3: A "Copenhagen-style" cycle path in Copenhagen [David Alpert, CCA-NC license]



8.56 To summarise:

- a) I consider an off-road path is safer than a standard on-road cycle lane provided the path is well designed with adequate visibility at driveways;

- b) I have concerns about the safety of cyclists using the proposed paths where there are numerous driveways as the visibility at driveways is substandard for the expected cyclist speeds;
  - c) The safety issues may require mitigation measures to be taken, for example speed bumps on driveways which have not been conveyed to potential submitters and may have undesirable effects; or
  - d) The safety issues may require an alternate design which may require a different designation footprint.
- 8.57 I recommend Auckland Transport provide more evidence on this matter for the hearing. Specifically, the visibility triangles that would be provided for minimum (worst-case), and typical locations.

### Public Transport

- 8.58 The primary public transport services in the area are the Rapid Transit Network (**RTN**) rail services along the North Island Main Trunk (**NIMT**) railway with stations at Ngākōroa (future station at Drury West), Drury, Papakura, Takanini, Te Mahia, Manurewa, and Manukau. Some Frequent Transit Network (FTN) services along the Great South Road and Porchester Road corridors are planned to provide good levels of public transport accessibility to areas further from rail stations. A number of connector and local bus services are intended to support and supplement the RTN and FTN services by connecting local neighbourhoods to the rail stations, FTN services, and to each other.
- 8.59 Two of the Projects are expected to improve the speed and reliability of the FTN bus routes in the area by enabling the provision of priority lanes for buses. In some cases changes to intersections may also improve travel times for all vehicles. Bus lanes are enabled but not required by the NoRs, but as the changes to intersections are shown on the Concept Drawings, the implementation of the Projects is expected to be in general accordance, not withstanding that AT may ultimately elect to change the form of any intersection at any time.

### Travel and Emissions

- 8.60 The hearings panel must consider the effects of the NoR having particular regard to matters including “any other matter the territorial authority considers reasonably necessary in order to make a recommendation on the requirement.” In the event the panel wishes to have regard to Auckland’s Transport Emissions Reduction Plan, I provide some comment in this report.
- 8.61 Auckland’s Transport Emissions Reduction Plan (**TERP**) has a goal of reducing travel in order to reduce emissions. The TERP provides vehicle kilometres travelled (**VKT**) as a measure of travel and an input into the calculation of vehicle emissions.
- 8.62 VKT is problematic to measure. VKT for assessments such as this is provided as an output of software transport models such as the regional MSM model or in this case the district-level SATURN model. The VKT estimates output by the models are for private vehicles (cars and trucks) and do not include travel made by public transport vehicles so underestimate VKT.
- 8.63 As stated in the ATE the models predict that the Projects would reduce private vehicle travel by 54,800 vehicle kilometres per year by 2048+, with bus VKT unknown. As the models use the same FULSS population projections and land use patterns and introduce no new roads, this reduction in VKT would principally result from more people using public transport or active modes. The percentage change in VKT is not given. It is not clear to what extent the estimated change in VKT might be affected by the changes in growth forecasts.
- 8.64 To summarise, it is reasonably certain that the Projects would enable a reduction in private vehicle VKT, and although the scale of that change is less certain, I consider the Projects support the TERP.

## Property Access

- 8.65 The ATE states that very few properties will have access affected by the Projects, however, some of the Projects have the potential to have impacts on property access arrangements.
- 8.66 AT can install traffic islands on any road following consultation with affected parties. Islands may prevent right turns in and out of properties and some side roads, and due to the inconvenience caused these treatments are generally only implemented on existing roads in order to address a significant safety issue.
- 8.67 The ATE notes that the requirement for turning restrictions will be determined as part of the OP process. I address this and other property access considerations for each Project below as I consider that turning restrictions in some locations would become far more likely or necessary to address the increased crash risk arising from the Project. In those instances I have estimated the additional travel length and time using the Google Maps Directions service.
- 8.68 All property must have legal access. I would therefore expect that if a suitable access could not be provided for a property for some reason, that the whole property may need to be acquired by AT, or that AT may need to acquire other property to provide access.
- 8.69 Even with some form of legal access provided to a property the existing or potential future uses of that land may be impacted by changes to the access arrangements. That could include removal of some movements by the introduction of a median island, or reduced space for manoeuvring of some vehicles.
- 8.70 Given the potential impact of changes to property access arrangements I consider it is important that the conditions for the designations address this matter comprehensively.
- 8.71 With that caveat, I consider the ATE assessment of effects on existing property access to be otherwise reasonable and adequate overall, subject to some site-specific issues I address for each Project below.

## Parking

### On-Street Parking

- 8.72 The ATE states all existing on-street parking along the Project corridors will be removed, and that there may be opportunities to use kerbside space for parking during off-peak periods.
- 8.73 AT and Council have developed a Parking Strategy entitled “*Room to Move*”<sup>35</sup> which explains that general vehicle parking is given the lowest priority for allocation of kerbside space, and that on the Strategic Transport Network movement will be prioritised over parking. The strategy also says “*Where delivery of projects on AT’s Strategic Transport Network requires the repurposing of road space dedicated to parking, AT’s policy is to repurpose that space to the more beneficial use - unless there are exceptional circumstances*”<sup>36</sup>
- 8.74 In this area the Strategic Network includes all of the project roads including Popes Road but excluding the section of Porchester Road north of Popes Road.
- 8.75 The existing rural sections of Popes Road have no parking restrictions, although the relatively narrow shoulders provide little opportunity for parking. As a result of this and the low development density little on-street parking occurs in these areas.
- 8.76 The existing sections of road in the urban areas typically have relatively moderate to high demand for on-street parking.

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<sup>35</sup> Room to Move: *Tāmaki Makaurau Auckland’s Parking Strategy*, Auckland Transport, May 2023

<sup>36</sup> Page 41, Room to Move.

- 8.77 The ATE considers the effect of the removal of on-street parking is minor “*given there are still opportunities for parking on surrounding side roads*” when “*considered in the context of the improved PT and active mode travel proposed by the Project which will minimise the need for car travel and parking.*”<sup>37</sup>
- 8.78 While the *Room to Move* strategy assigns a low priority to on-street parking on arterial roads, the strategy does not address any effects that may arise from removal of parking.
- 8.79 I do acknowledge that Auckland Transport could restrict or prohibit parking on any section of road at any time, but I also note that is subject to consultation with affected parties and the Local Boards.
- 8.80 I also acknowledge the two FTN Projects could improve the attractiveness of public transport, and that all Projects could improve the attractiveness of active modes of transport. As a result the Projects may contribute to fewer journeys being made by car, but in my view this is unlikely to fully offset the loss of parking.
- 8.81 I expect levels of car ownership could remain at moderate levels in future, even if those cars are not used for peak-period travel. I consider the Projects would not significantly reduce the future demand for car parking compared with existing levels, particularly in light of the removal of parking minimums which is likely to result in less off-street parking as areas are developed or redeveloped.
- 8.82 No data has been provided in the ATE on the distances to alternate sources of parking, such as side roads, and no data has been provided on the current or forecast demand for parking in those locations. In some cases any alternative supply of parking is a considerable distance away and is already subject to high demand.
- 8.83 As a result I consider the effects arising from removal of on-street parking have not been adequately assessed or addressed in the application material. I recommend that Auckland Transport provide evidence on this matter.
- 8.84 I address any project-specific on-street parking matters below.
- 8.85 Regardless of the longer-term operational availability of on-street parking I expect that parking may need to be removed or restricted during the construction period(s), and that would be managed through the proposed management plans.

#### Parking on Properties

- 8.86 Some properties proposed to be designated have parking or loading areas located in affected areas, and the ultimate removal of the designated land may also result in parking or loading areas outside the designation being affected by changed access or manoeuvring geometry. The impact of this change has not been assessed in the NoR documentation.
- 8.87 Properties that have higher development density may not be able to relocate or replace the parking or loading spaces lost as a result of the Projects. The ATE does not assess the effects of these changes and suggests that impacts on private properties would be addressed when considering financial compensation at a later date and notes the AUP no longer contains minimum parking requirements.
- 8.88 That approach does not address any overflow effects outside those properties, such as an increase in demand for other supplies of parking in the area. I acknowledge that the removal of parking minima could result in similar effects at any time when neighbouring sites are redeveloped, although such effects would typically occur gradually rather than all at once.

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<sup>37</sup> Section 4.1.7, ATE.

## **Management of Operational Effects**

- 8.89 Given the uncertainties due to the current level of design and the long implementation timeframes it is not possible to be certain about the degree of adverse effects.
- 8.90 For access to properties proposed Condition 15 “Existing property access” requires the OP to demonstrate how safe access will be provided for each existing access that is altered. I recommend that condition be amended to require that access be also demonstrated to be effective or fit for purpose bearing in mind the vehicles that need to access the site. I have made a similar recommendation for the Pukekohe projects. To date that has not been accepted by SGA as they consider that any ineffective access would invariably be unsafe, and they prefer consistency between the designation conditions for their projects across the region. Subject to any development made in the Pukekohe process after the preparation of this report, I continue to recommend (at paragraph 12.3) the addition of words such as “effective” or “fit for purpose”.
- 8.91 It is common for construction effects for larger projects to be managed through one or more management plans, and that is the process proposed for these projects. The content of the construction management plan conditions is addressed at paragraph 12.4

## **NoR 1: Great South Road Frequent Transit Network Upgrade**

### **Design and Changes to Network**

- 8.92 Great South Road is an existing FTN route. The wider FTN Project involves changes along the length of Great South Road between Manukau and Drury, although only the discrete sections where additional land is required are addressed in the notified material.
- 8.93 All of Great South Road currently has a footpath on both sides of the road and there are unprotected on-road cycle lanes along some parts of the corridor.
- 8.94 The following description of the design and expected features of the Project are based on my interpretation of the GA drawings, the information supplied in the ATE, and the additional information provided by AT in response to s.92 requests.
- 8.95 The Project, as shown on the GA drawings, enables the provision of separate pedestrian and cycle paths between the carriageway and the property line on both sides of the road. Scaling from two sections of the General Arrangement drawing the GA concept design includes:
- a) a 1.5-2.0m wide footpath located approximately 0.4-0.5m from the property boundary;
  - b) a 2.0m wide cycle path;
  - c) a grassed berm which varies in width from around 0.9m to 2.4m or more.
- 8.96 Most of the corridor currently has kerbside parking on both sides of the road. The Project would remove all parking from both sides of the road for the full length of the corridor. The ATE suggests that future consideration may be given to allowing on-street parking in some areas during off-peak periods.

### Section 1: Browns Road - Grand Vue Road

- 8.97 This section currently has a northbound bus lane and my understanding is the lane arrangement in that section would remain the same.
- 8.98 The Great South Road / Browns Road Intersection is currently controlled by traffic signals and a northbound bus lane stops short of the intersection. Those features are proposed to remain. The Project expands the road reserve, removing the retail properties on the western



side of the road in the process, so that cycle paths could be added on both sides of Great South Road. The Project also makes some short lanes on the southern side of the intersection slightly longer and that appears to be the reason for the predicted improvement in performance of the intersection.

- 8.99 The Great South Road/ Grand Vue Road intersection is currently controlled by a Stop control, and has one traffic lane in each direction, a flush median and an a.m. peak northbound bus lane. The Project adds traffic signals and retains the same lane arrangement. The UDE drawings show the northbound bus lane retained to the stop line of the signals<sup>38</sup>, but the ATE has modelled the lane stopping 60m prior to the intersection.<sup>39</sup> The addition of traffic signals is expected to increase delays on Gt South Road and substantially reduce delays on Grand Vue Road<sup>40</sup>. The road reserve is expanded on the eastern side of the road so cycle paths could be added on both sides.
- 8.100 Away from the intersections the existing lane arrangement is shown to be retained and the road reserve is expanded on the eastern side of the road to allow cycle paths to be installed on each side.
- 8.101 It appears the changes such as the introduction of traffic signals at Grand Vue Drive could be achieved within the existing road reserve and the expansion of the reserve predominantly provides for cycle paths.

#### Section 2: Mahia Road Intersection

- 8.102 The Great South Road / Mahia Road intersection is currently controlled by traffic signals. Away from the intersection Great South Road has one lane in each direction north of Mahia Road and two lanes in each direction south of Mahia Road, one of which turns left into Mahia Road via a slip (Give Way) lane.
- 8.103 The Project expands the road reserve along the eastern side of the road so that an additional short lane could be provided for traffic turning right into Mahia Road, a second northbound lane could be provided for about 200m north of the intersection, and both kerbside lanes leading away from intersection could become bus lanes. The changes to the intersection are modelled to result in a little worse performance overall in the a.m. peak and better performance in the p.m. peak<sup>41</sup>.
- 8.104 The expansion of the road reserve also allows cycle paths to be added on each side of the road. The left turn slip lane is removed in the GA design.

#### Section 3: Walter Strevens Drive / Taka Street Intersection

- 8.105 At this intersection, which is controlled by traffic signals, Great South Road currently has four or five lanes and no bus lanes, and this tapers to one lane in each direction with a flush median away from the intersection. Unprotected cycle lanes are provided on the main carriageway.
- 8.106 The Project retains the traffic signals and maintains the motor vehicle lane arrangement at the intersection, with a four-lane-plus-median cross section possibly including kerbside bus lanes away from the intersection. The modelling shows minimal changes in performance.
- 8.107 Cyclists are moved from the carriageway to roadside paths which are facilitated by relatively minor expansion of the road reserve on each corner of the intersection.

<sup>38</sup> Urban Design Evaluation Appendix A: Great South Road 1 / Grout South Road 2, Sheet 3

<sup>39</sup> Assessment of Transport Effects Appendix A – SIDRA Lane Summary Outputs, page 1

<sup>40</sup> ATE, Table 5-3, page 59.

<sup>41</sup> ibid

#### Section 4: Subway Road

- 8.108 This intersection is currently controlled by traffic signals with four lanes plus a flush median to the south, and three lanes plus a flush median and kerbside parking to the north. The Project would narrow the carriageway to the north, removing the flush median and parking to provide a second northbound lane which could become a bus lane further north. The modelling shows negligible changes in performance.
- 8.109 The road reserve is to be expanded on the eastern side to allow cycle paths to be added on both sides of the road.

#### Section 5: Wood Street, Opāheke Road, and Wellington Street Intersections

- 8.110 This section extends south from the roundabout at Wood Street to the intersection of Wellington Street which is controlled by traffic signals. The intersection of Opāheke Road in between is currently controlled by a Stop control. Great South Road has one lane northbound and two lanes southbound.
- 8.111 The Project retains the current lane arrangements, but the modelling shows poorer performance at Wellington Street as a result of changed travel patterns. With the Project the model has more traffic using the intersection in the a.m. peak, and less traffic in the p.m. peak, and I expect this is the result of traffic being rerouted due to changes elsewhere in the network.
- 8.112 The road reserve is proposed to be expanded on both sides of the road and this allows for the provision of a cycle path on each side.

#### Section 6: Clark Road to Butterworth Avenue

- 8.113 This section currently has two traffic lanes plus a flush median, widening at the signal-controlled Great South Road/ Settlement Road/ Beach Road intersection to a total of five lanes.
- 8.114 The Project removes the flush median and reassigns that space to a second northbound lane which could be used as a bus lane. Aside from the possible bus lanes there are no material changes to the lane arrangements resulting in a minor change in the a.m. peak performance proportionate to a small increase in traffic volume, and a small improvement in the p.m. peak performance as the result of fewer vehicles assumed to use the intersection.
- 8.115 The road reserve is expanded on both sides of the road so that a cycle path can be provided on each side.

#### Section 7: Park Estate Road

- 8.116 In this section Great South Road currently has one traffic lane in each direction plus a flush median plus kerbside parking on both sides.
- 8.117 The Project includes replacing the existing Stop control on Park Estate Road with traffic signals. It also includes removing the flush median and kerbside parking to accommodate northbound bus lane and additional lanes at the traffic signals.
- 8.118 As expected, the introduction of traffic signals is modelled to result in additional delay for traffic on Great South Road and reduced delay for Park Estate Road traffic.
- 8.119 South of Park Estate Road the road reserve is expanded on the western side to provide for the installation of a cycle lane on both sides of the road.

### Section 8: Slippery Creek Bridge

- 8.120 Near Slippery Creek Bridge, Great South Road currently has one lane in each direction with footpaths and kerbside parking on both sides of the road. South of the bridge the road also has a flush median.
- 8.121 The Project replaces the bridge with a wider structure and reassigns the existing carriageway to one lane southbound and two lanes northbound with the kerbside lane potentially being a bus lane. Cycle paths are added to both sides of the road by reallocating the roadside space and by narrowing the carriageway.
- 8.122 The road reserve is expanded on both sides to provide space for the construction of the bridge and approaches.

### **Interdependencies and Staging**

- 8.123 This Project does not appear to be dependent on any other project and could be operated at any time once funding is provided. It does not appear that any other project is dependent on this Project being provided.
- 8.124 There appears to be no reason the Project could not be implemented in stages and given the extent of the corridor and the various environments along it, I consider staging to be likely.
- 8.125 Closure of Slippery Creek bridge during reconstruction has the potential to significantly reduce capacity on this corridor resulting in diversion to other corridors which do not have sufficient capacity. The adverse effects of closure of this bridge would be significant unless the Mill Road or new North-South Opāheke Arterial are operational. This is addressed further under Construction Effects below.

### **Property Access**

- 8.126 The ATE notes that no changes to property or side road access is expected.
- 8.127 The Project involves the removal of flush medians along significant sections of the corridor. Removal of flush medians is expected to result in a reduction in safety and decreased efficiency for turning movements.
- 8.128 I expect that movements in and out of Coulthard Terrace, a residential cul de sac, would be impacted by the introduction of traffic signals at the nearby intersection of Park Estate Road. The removal of the flush median, the introduction of queuing in two lanes, and the possible introduction of a median island are all expected to increase delay and reduce safety for these movements.
- 8.129 As a result of the increased crash risk at Coulthard Terrace because of the Project, I expect that a median island is likely to be installed at that intersection. If that occurred, traffic currently turning right out of Coulthard Terrace would probably detour along Park Estate Road, Goodwin Drive, Tatariki Street and Taonui Street adding around 800m and 2 minutes travel. Traffic currently turning right into Coulthard Terrace would probably use the same route adding around 1.8km and 5 minutes travel.

### **Parking**

- 8.130 As noted in the ATE, all kerbside parking is proposed to be removed from the corridor. The ATE suggests alternate parking is available in nearby side roads but does not provide any information on the existing or likely future demand for parking in those side roads, or the distances to the nearest side roads with parking.

#### Section 1: Browns Road - Grand Vue Road

- 8.131 If the northbound bus lane is made available for parking during off-peak periods as it is now, there is little impact on on-street parking in this section as much of the section currently has no parking available on the eastern (southbound) side. The small number of spaces removed from the eastern side of the road near Grand Vue Road are likely to be displaced into Grand Vue Drive a short distance away.
- 8.132 Parking spaces located on 21 Great South Road, a commercial property near Browns Road, are said in the ATE to include six spaces within the cross-section and a further three spaces within the designation. It is possible that additional spaces would be lost as the result of redesign of the property access.

#### Section 2: Mahia Road Intersection

- 8.133 Kerbside parking is currently available on both sides of Great South Road north of Mahia Road and this parking appears to be in high demand from nearby businesses and intensifying residential development.
- 8.134 The nearest alternate sources of parking are a few spaces in Mahia Road, Beaumonts Way Extension (a cul de sac parallel to Gt South Rd) and Kevale Place (a minor residential cul de sac), all about 300m away.
- 8.135 Nine commercial properties along the eastern side of Great South Road have some land within the designation footprint with some or all of that land used for on-site parking. Seven of the nine properties are currently used for second-hand car sales and the "parking" spaces appear to be used for the display of vehicles for sale rather than parking for staff or customers. The ATE suggests that the car dealerships would not be able to display as many cars for sale, but the ATE considers there is still sufficient space for some cars to be parked.
- 8.136 The remaining two properties are not directly addressed in the ATE, and these properties currently accommodate automotive repair and maintenance businesses.
- 8.137 The reduction in site area may make the sites unusable for these activities in the future. I understand that is an effect that is appropriately dealt with as part of the land acquisition and compensation process.

#### Section 3: Walter Strevens Drive / Taka Street Intersection

- 8.138 There is currently little on-street parking available on Great South Road within the proposed designation area, apart from a few spaces on the eastern side of the road south of Taka Street that will be displaced by the proposed cycle path. While the impact is relatively small, when considered cumulatively with the impacts of removal of parking along the rest of the corridor the impacts would be more significant.
- 8.139 The nearest alternate sources of parking are Walter Strevens Drive, Graham Road and Waimana Road just over 100m to the west which currently has a moderate demand for parking.

#### Section 4: Subway Road

- 8.140 There is currently no roadside parking in this section and no on-site parking is currently located within the designation footprint.

#### Section 5: Wood Street, Opāheke Road, and Wellington Street Intersections

- 8.141 There is currently no roadside parking in this section and no on-site parking is currently located within the designation footprint.

#### Section 6: Clark Road to Butterworth Avenue

- 8.142 There is currently no kerbside parking north of Beach Road. There is some kerbside parking on both sides of Great South Road south of Beach Road which appears to have low demand and is relatively close to an alternate supply in Butterworth Avenue.

#### Section 7: Park Estate Road

- 8.143 Parking is currently available on both sides of Gt South Road, but alternate sources are currently available nearby in Coulthard Terrace and Park Estate Road.

#### Section 8: Slippery Creek Bridge

- 8.144 Parking is currently available on both sides of the road and appears to have low demand. The nearest alternate sources of parking are Miro Street, a small residential cul de sac about 200m south of the bridge, Cross Street and Sutton Road about 400m south of the bridge, and Parkhaven Drive about 400m north of the bridge. Additional travel distance along each side road is likely to be required. For reference walking 400m typically takes a pedestrian around 5 minutes to walk.

### **NoR 2: Great South Road Upgrade (Drury Section)**

#### **Design and Changes to Network**

- 8.145 West of Hingaia Stream bridge the road currently has one traffic lane and a cycle lane in each direction with a flush median. Hingaia Stream bridge has one traffic lane in each direction and a narrow footpath on the southern side of the bridge. East of the bridge the road has one traffic lane in each direction. Kerbside parking is provided on one side in parts, and a flush median is provided through the bend to the eastern end of this Project.
- 8.146 The following description of the design and expected features of the Project are based on my interpretation of the GA drawings, the information supplied in the ATE, and the additional information provided by AT in response to s.92 requests.
- 8.147 The Project involves the replacement of Hingaia Stream bridge with a structure having four traffic lanes (two in each direction) along with separate pedestrian and cyclist paths on each side. Either side of the bridge the road will have four traffic lanes, separate pedestrian and cyclist paths, and a median of varying width and uncertain form.
- 8.148 The Project will remove all on-street parking from both sides of the road for the full length of the Project.
- 8.149 The intersection of Great South Road and Firth Street, currently controlled by a Stop sign, is proposed to be controlled by traffic signals. As expected, this change results in increased delays for Great South Road traffic and reduced delays for Firth Street traffic. The introduction of signals is expected to provide an improvement in safety along with an avoidance of adverse safety impacts that would otherwise be generated by the widening of Great South Road. The provision of signals may result in more traffic using Firth Street to access Great South Road and the nearby Southern Motorway Dury Interchange.
- 8.150 The widening of the road and the higher elevation of the replacement Hingaia Stream bridge generally results in the new road formation being at a higher level than most of the surrounding properties. The General Arrangement drawings show batters to address the height difference.
- 8.151 Nearly all of the proposed features can be accommodated within the existing road reserve, except for the paths on the northern side of the road at the eastern end of the project, and

proposed batters. The road reserve is also expanded to provide for the reconstruction of the bridge and construction of the batter slopes.

- 8.152 The cycle paths proposed in this section are in most cases located further from existing property boundaries due to the reasonably wide existing road reserve. They are further removed from the proposed initial designation boundaries, principally due to the batter slopes. In addition, the current land use is typified by larger sites with relatively open frontages resulting in fewer driveways and improved sight lines. As a result, provided careful attention is given to sightlines when reviewing the final post-construction road boundaries, I have fewer concerns about the safety of the cycle paths than in the other Projects.

### **Interdependencies and Staging**

- 8.153 This Project is less dependent on changes in growth forecasts as significant areas of land in this area have recently been zoned for development.
- 8.154 This Project is related to the project undertaking the upgrade of Great South Road further west but I expect each project could be implemented separately from the other.
- 8.155 There are interdependencies for construction which are addressed later.

### **Property Access**

- 8.156 The ATE notes that no changes to property or side road access is expected.
- 8.157 The GA drawings show a median along the length of this Project which could be formed as a flush median or a median island. If formed as an island the Project has the potential to remove right turn movements at property driveways, and this potential effect has not been assessed. That is appropriate provided the median is formed as a flush median.

### **Parking**

- 8.158 As noted in the ATE, all kerbside parking is proposed to be removed from the corridor. The ATE suggests alternate parking is available in nearby side roads but does not provide any information on the existing or likely future demand for the parking to be removed, the demand for parking in those side roads, or the distances to the nearest side roads with parking.
- 8.159 The only side roads in this area are Firth Street near the western end and Norrie Road just beyond the eastern end of the Project. These roads are over 450m apart, so the distance to any alternate source of parking could be considerable. In addition the current demand for parking in those side roads appears to be moderate to high and I expect the demand for on-street parking would increase as the area redevelops and intensifies.
- 8.160 The Project involves removing on-site parking from two larger properties on the northern side of the road east of Hingaia Stream. These properties are occupied by trade suppliers, automotive services, an automotive retailer, and a veterinarian, which are activities that tend to be more reliant on parking.
- 8.161 The ATE indicates that across these two properties only one parking space is within the expected cross-section and a further twenty-five parking spaces are within the designation. It appears from the GA drawings that other parking spaces lie just outside the designation and those parking spaces rely on access aisles within the designation for access. The number of parking spaces and the impact on the activities on these sites could potentially be more significant than indicated.

### **NoR 3: Takanini Frequent Transit Network**

- 8.162 I have considered this Project in three sections.
- 8.163 The following description of the design and expected features of the Project are based on my interpretation of the GA drawings, the information supplied in the ATE, and the additional information provided by AT in response to s.92 requests.

#### **Section 3A: Weymouth Road**

##### Design and Changes to Network

- 8.164 This section is approximately 300m long and runs from the roundabout at the intersection of Selwyn Road and Rogers Road through to Great South Road. The section passes the access to the Manurewa Station and Interchange, the intersection with Beaumonts Way, the bridge over the NIMT railway, and accesses to commercial premises including the Southmall parking area.
- 8.165 This section currently has one traffic lane in each direction with a flush median along the length except on the bridge. Kerbside parking is prohibited in this section, which has footpaths on both sides of the road.
- 8.166 The Project expands the road reserve on both sides to facilitate a wider road cross-section including two eastbound lanes through the entire section plus an additional turning lane at the Great South Road intersection; two westbound lanes east of the railway changing to one lane for westbound traffic and one lane for traffic turning right into the station. This involves replacement of the bridge over the NIMT railway at Weymouth Road with a wider bridge and changes to the Great South Road / Alfriston Road intersection. The project also enables the provision of separated walking and cycling paths on both sides of the road.

##### *Great South Road / Alfriston Road Intersection*

- 8.167 The changes to this intersection include:
- a) On the Great South Road southern approach - adding an additional lane in each direction away from the intersection and possibly pulling the bus lanes back from the intersection to provide additional lanes for general traffic;
  - b) On the Great South Road northern approach - possibly removing the bus lanes and removing the slip lane for the left turn into Alfriston Road;
  - c) On the Weymouth Road and Alfriston Road approaches - adding an additional lane in each direction away from the intersection, possibly assigned to buses, and adding an additional lane for turning traffic;
- 8.168 These changes are modelled to provide significant improvements in operation during both peak periods.

##### Interdependencies and Staging

- 8.169 The changes to this section of road are tightly integrated with the widening and replacement of the bridge over the NIMT railway. That bridge replacement is in turn interrelated with KiwiRail project(s) to increase the number of main lines within the rail corridor.

## Property Access

### *Southmall Access*

- 8.170 Southmall is at 185 Great South Road and that property has vehicle access via Station Road at the north end, Great South Road, and Weymouth Road at the south end. The neighbouring McDonalds property at 207 and 209 Great South Road has independent access to Great South Road and access through the Southmall site. The McDonalds building and part of the Southmall parking area are within the Project cross-section and additional areas of both sites are within the designation footprint.
- 8.171 The existing flush median with a right turn bay for traffic entering the Southmall parking area from Weymouth Road is not shown on the drawings and the GA drawings show a non-specific median and an opposing right turn lane across the Southmall entrance. The ATE states: *“Access to the majority of existing properties will remain the same with the exception of properties at Beaumonts Way which is proposed to be cul-de-saced.”*<sup>42</sup>
- 8.172 It is not clear from the information provided if right turn movements in or out of the Southmall driveway will be retained, or if retained those movements could be made safely. If right turn movements are retained I expect that vehicles would be turning across two lanes where queueing is frequent, which is known to be hazardous. It is also possible the reconstructed bridge may reduce sight distances at this access further increasing hazards for all traffic moving in or out of this driveway if it is to be retained.
- 8.173 If right turn movements in and out of this Southmall driveway are to be removed, and I consider the Project would make that highly likely, the effects of that change have not been assessed and measures to mitigate or otherwise manage those effects have not been provided. The same is true if this driveway is to be closed either permanently or during construction. I invite AT to provide more information on this matter for the hearing.

### *8 Weymouth Road*

- 8.174 All properties accessed from the southern side of Weymouth Road east of the railway are located entirely within the designation except 8 Weymouth Road. That site is a rear side accessed only from an access strip. The access strip is located within the designation but the remainder of the site is not. It is not clear from the material provided how this site will be accessed during or after construction. I invite AT to provide more information on this matter for the hearing.

### *KFC*

- 8.175 The KFC restaurant is located on the southwestern corner of the Great South Road / Weymouth Road intersection. The site has a vehicular access point on Weymouth Road and it is unclear if this access is to be closed, if right turn movements would be available, and if the site could still provide adequate movement of vehicles. I invite AT to provide more information on this matter for the hearing.

### *Closure of Beaumonts Way*

- 8.176 As noted in the ATE the Project includes closing the northern end of Beaumonts Way so it no longer provides a connection for vehicles to and from Weymouth Road. A turning head is proposed to be installed at the closed end of Beaumonts Way.
- 8.177 The right turn out of Beaumonts Way is currently prohibited. When the Project is implemented the other three movements at the intersection would need to detour by using Rogers Road and most likely Blossom Lane. The ATE has assessed the additional travel to be less than 1km with an additional travel time of around two minutes and considers this to have a minor effect.

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<sup>42</sup> Section 7.2.6.1, ATE.



- 8.178 I consider the additional travel time would be up to around 4 to 6 minutes during peak periods. Traffic detouring along Blossom Lane would travel over speed humps intended to moderate the speed and volume of traffic using the street and produce additional noise. I consider the adverse effects on safety and the efficient movement of traffic would be minor.

#### Parking

- 8.179 The Project involves removing parking spaces from several properties in Weymouth Road including 4, 6 and 10 Weymouth Road. Those properties are on the south side of Weymouth Road between Great South Road and the railway and are shown as being entirely within the designation, and as land to be redefined and integrated post-construction. In my view the loss of the parking from these sites is inconsequential if the entire landuse is to be removed.
- 8.180 The ATE notes that parking is also to be removed from the Park n Ride site with ten spaces in the cross-section and a further thirty-four within the designation. From the GA drawings it appears all of the parking spaces within the designation and cross-section are associated with commercial activities located on sites between the Park n Ride and Weymouth Road at 11 and 15 Weymouth Road. These properties are also entirely within the designation so I expect these properties to be acquired and the activities removed, so the removal of parking would appear to be inconsequential for operation of those activities.
- 8.181 Parking is also to be removed from the Southmall site at 185 Great South Road, from the McDonalds site at 207 Great South Road, and the KFC site. The ATE does not include these spaces in the number of spaces affected, or in the assessment.
- 8.182 From the GA drawings the entire McDonalds building is within the cross-section and the designation so I expect that building to be demolished and consider the loss of these parking spaces to be inconsequential to the operation of that activity as the land use is to be removed.
- 8.183 I expect loss of Southmall parking spaces would be a minor proportion of the total parking supply on that site, but I also expect that parking to be well used, particularly at busier times of the week or year.
- 8.184 The loss of parking on the KFC site may affect the operation of that site.
- 8.185 I invite AT to provide more information on these matters for the hearing.

#### Cycle Path Safety

- 8.186 At present there are five residential driveways west of the railway (#18A and #2/18A, #20, #2/20, #22, #24 and #1/24) and several driveways east of the railway (#2, #4, #6, #8, #10, and #12). The Project is expected to remove all of the existing driveways on the eastern side of the railway, but some driveways may be located in this section depending on how the land is redeveloped after construction. On the western side of the railway, the Project will remove a dwelling leaving four residential driveways. As the number of retained existing driveways is small and I expect new driveways on the eastern side will have better sightlines my concerns for cyclist safety on the path proposed for the southern side of the road are minor.
- 8.187 There are only two access points on the northern side of the road – one for the transport centre and one for Southmall as discussed above. The transport centre driveway is proposed to be treated as an intersection, and it appears the Southmall driveway is proposed to be removed, or in the event it is retained it is likely to have sufficient sightlines for cyclists, so my concerns about cyclist safety on the northern side of the road are also minor.

### **Section 3B: Great South Road**

#### Design and Changes to Network

- 8.188 The NoR 3 Project also includes the section of Great South Road on either side of the Alfriston Road / Weymouth Road intersection to a point south of the McAnnalley Street intersection.
- 8.189 This section of road currently has one general traffic lane and one cycle lane in each direction with a flush median, and no kerbside parking. The McAnnalley Street intersection is currently controlled by a Stop sign.
- 8.190 The Project proposes to add a northbound bus lane through this section and proposes to add a southbound bus lane as far as McAnnalley Street.
- 8.191 The Project proposes to control the McAnnalley Street intersection with traffic signals resulting in minor increases in average delay across the intersection. This is due to the signals introducing delay to Great South Road traffic and reducing delay to McAnnalley Street traffic.
- 8.192 The Project expands the road reserve, principally on the western side of the road. The expansion provides for a northbound bus lane and for the introduction of separate cycle paths.

#### Property Access

- 8.193 The ATE expects no changes to property or side road access in this section, and that would appear to be reasonable for most of this section provided all of the medians are flush medians.
- 8.194 The primary exception appears to be the Z service station located on the south eastern corner of the Great South Road / Alfriston Road intersection at 228 Great South Road. From the GA drawings a significant portion of the paved area around the periphery of the service station forecourt is to be within the designation and it is unclear if vehicles such as the fuel delivery tanker would be able to manoeuvre within the site, or unload fuel clear of vehicle circulation spaces during or after construction. I invite AT to provide more information on this matter for the hearing.

#### Parking

- 8.195 The ATE notes the Project would result in the loss of six parking spaces on Great South Road just north of McAnnalley Street. These parking spaces appear to supplement the angle parking spaces provided outside the small retail centre in McAnnalley Road. I expect the loss of those parking spaces would increase the demand for parking in McAnnalley Road which appears to be in relatively high demand due to the retail centre and residential intensification in the area. I expect AT may need to review parking management and introduce time-restricted parking near the retail centre to assist in mitigating the loss of these parking spaces, although that would require separate approvals.
- 8.196 This section includes expansion of the road reserve on the eastern side of Great South Road and this includes several commercial properties with parking located in the cross section and in the designation. These properties at 228 (Z service station) to 240 Great South Road have not been identified in the ATE as having parking removed and this loss has not been assessed.
- 8.197 Some of these sites appear to have little other parking available on the site and the removal of the parking spaces during and after construction may mean the current activities on the site could not continue to operate.
- 8.198 I invite AT to provide at the hearing an assessment of the loss of these parking spaces and options for addressing the loss of parking.

### Cycle Path Safety

- 8.199 I have concerns for cyclist safety along this section of road due to the frequency of driveways.

### **Section 3C: Alfriston Road**

- 8.200 This section of the Project extends along Alfriston Road from Great South Road, over the Southern Motorway via a bridge, and then to east of Magic Way.

### Design and Changes to Network

- 8.201 This corridor currently has one general traffic lane and one cycle lane in each direction with a flush median. There is no kerbside parking in this section aside from two indented parking bays each with two parking spaces on the northern side of the road.
- 8.202 The Project involves narrowing the flush median and widening the carriageway to provide two traffic lanes in each direction. The kerbside lanes are proposed to be allocated to buses (as shown on the ATE drawings). Separate walking and cycling paths are to be provided on each side of the road. The Project involves expansion of the road reserve on both sides to provide for the additional lanes and paths.
- 8.203 The Project also includes replacement of the bridge over the Southern Motorway, and installation of traffic signals at Scotts Road<sup>43</sup>, supplementing the signals recently installed at Claude Road and the signals at Magic Way.
- 8.204 The ATE modelling forecasts minor improvements in performance at the Claude Road and Magic Way intersections which are currently controlled by traffic signals, and a minor increase in overall delay at the Scotts Road intersection due to the introduction of traffic signals there.

### Property and Side Road Access

- 8.205 The ATE expects no changes to property or side road access in this section, and the SGA response to the s.92 RFI (Item T1) reiterates “*No location has been identified where a solid median/traffic island is required that may impact property access.*” The s.92 RFI for an assessment of the increased crash risk at these intersections in the absence of islands was not addressed in the s.92 response.
- 8.206 When considering road safety along this section the ATE notes there may be issues in the future at the Brough Road and Fleming Street intersections due to the additional lanes on Alfriston Road. The ATE notes “*the proposed cross-section allows a solid median to be implemented in the future and does not preclude signalisations of the intersections if it is found to be a safety concern.*”<sup>44</sup>

### *Brough Road*

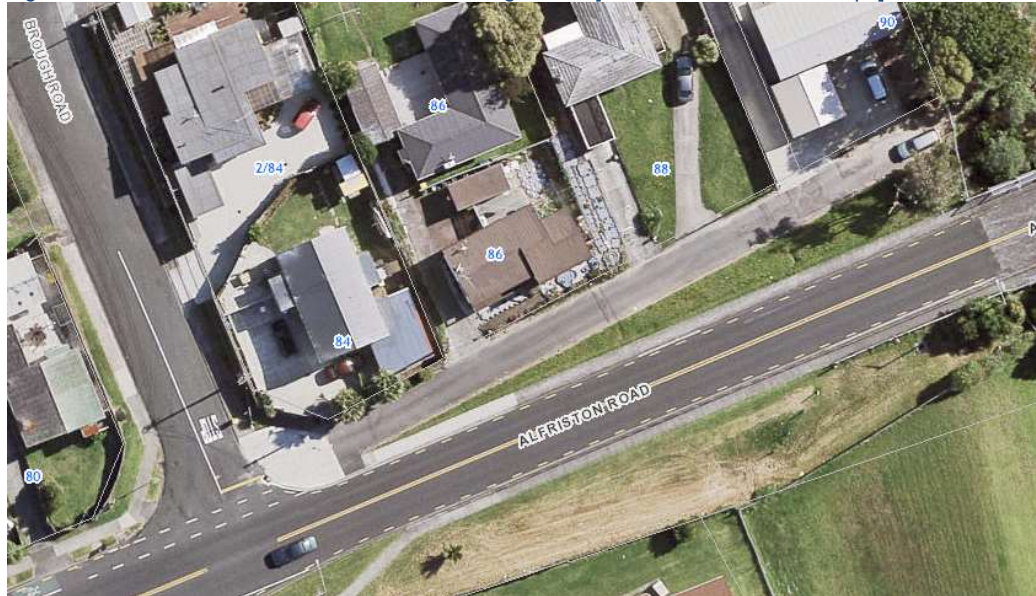
- 8.207 Brough Road is a residential cul de sac a short distance west of the Southern Motorway. At present a service lane along the northern side of Alfriston Road provides access to seven residential properties at 84 to 90 Alfriston Road and this service lane connects to Alfriston Road at the Brough Road intersection.

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<sup>43</sup> Section 7.2.3, ATE

<sup>44</sup> Section 7.2.3, ATE

Figure 4: Aerial view of the service lane near Brough Road [Auckland Council GeoMaps]



8.208 The GA drawings show the designation footprint and an embankment extending across the service lane and four of the seven properties serviced by it. While some of the existing houses may be removed as a result of the Project, the notified material does not provide a design solution for provision of access to these properties. I invite AT to provide information on this matter at the hearing.

8.209 If a median island is installed in Alfriston Road across the Brough Road intersection, the properties access from the replacement service lane, all properties in Brough Road, and at least four (1/81- 4/81) and possibly eight (1/77, 2/77, 1/79, 2/89) dwellings on the southern side of Alfriston Road would be affected.

8.210 Detouring around the removal of the right turn exit from Brough Road and the northern properties is most likely to involve turning into Magic Way, U-turning around the Skelton Avenue roundabout, and returning back along Alfriston Road, resulting in around 1.2km and three to six minutes of additional travel. Detouring around the removal of the right turn entry is likely to result in traffic looping back using Scotts Road, McAnnalley Street and Fleming Street with an additional 1.7m and 3 to 4 minutes additional travel.

8.211 For the dwellings on the south side of Alfriston Road the right turn exit detour is likely to use the Scotts Road, McAnnalley Road, Fleming Street loop as above and the right turn entry detour is likely to use the Magic Way/ Skelton Ave roundabout with additional travel as outlined above.

#### *Fleming Street*

8.212 The GA drawings show Fleming Street marked with a left-turn only arrow road marking at the intersection with Alfriston Road which is inconsistent with SGA's statements about median islands.

8.213 I consider the introduction of a median island at Fleming Street to be unlikely in the absence of the Project and highly likely with the Project. If such an island is installed at this intersection it would prevent right turns in and out of Fleming Street and a number of properties on the northern side of Alfriston Road.

8.214 Fleming Street connects to McAnnalley Road which runs between Great South Road and Scotts Road, so there are feasible detour routes. The detours could be in the order of an extra 300-600m travel distance and a minute or two of additional travel time depending on the

direction of travel and the time of day. I consider the additional travel to be relatively minor although multiple dwellings in Fleming Street and Hyde Street would be affected.

- 8.215 Properties on the northern side of the road could use Claude Road, Halver Road, and the section of Great South Road the ATE describes as highly congested to overcome the removal of the right turn exit movement. The additional travel distance would be in the order of 500m and an additional 2 to 4 minutes of travel time in peak periods. Detouring around the removal of the right turn entry movement is most likely to use Fleming Street, McAnnalley Street and Great South Road, adding around 1.5km and 3 to 6 minutes to the journey.

#### *228 Great South Road - Z Service Station*

- 8.216 It appears the Project will modify the access and internal circulation arrangements at the Z service station located on the south eastern corner of the Great South Road / Alfriston Road intersection at 228 Great South Road. From the GA drawings a significant portion of the paved area around the periphery of the service station forecourt is to be within the designation and it is unclear if vehicles such as the fuel delivery tanker would be able to manoeuvre within the site, or unload fuel clear of vehicle circulation spaces during or after construction. I invite AT to provide more information on this matter for the hearing.

#### Parking

- 8.217 The Project would result in the loss of four on-street parking spaces along the northern side of Alfriston Road that appear to be well used by nearby residents. Those spaces are not included in the ATE but are acknowledged as being removed in the SGA response to the s.92 RFI (Item T3).
- 8.218 The ATE notes that properties at 2 Alfriston Road (Manurewa Methodist Church) and 6 Alfriston Road (Manurewa Cosmopolitan Club) would have parking spaces within the designation, but not in the cross-section. The ATE also notes that eleven parking spaces at Gallaher Park are within the designation with none within the cross-section.
- 8.219 As a result I expect it may be possible for these parking spaces to only be lost during construction, but that would depend on the results of a post-construction review of the designation by AT. If that did occur I consider the impact of these spaces being lost during the construction period to be relatively minor.
- 8.220 The ATE does not identify the loss of parking at 5 Alfriston Road, an automotive repair activity, which is shown on the GA drawings, both within the cross-section and the designation. Parking also appears to be removed from residential properties at 26, 29, 34, 40, 55, 57A, 61, 63, 65, and 67 which is not acknowledged or assessed in the ATE.
- 8.221 The GA drawings also show the entire parking area at 52 Alfriston Road (Busy Bees childcare centre) to be within the designation, and the cross-section would render any of the remaining area within the designation unusable for parking. I expect the Project may prevent the centre from maintaining conditions of resource consent, and as activities like childcare centres in suburban areas are highly dependent on convenient on-site parking I consider the Project to have a significant adverse effect on this activity, irrespective of any consenting issues.
- 8.222 I invite AT to provide an assessment of the loss of these parking spaces and options for addressing the loss of parking.

#### Cycle Path Safety

- 8.223 I have concerns for cyclist safety along this section of road due to the frequency of driveways.

## NoR 4: Porchester Road and Popes Road Upgrades

- 8.224 I consider this Project in four sections.
- 8.225 The following description of the design and expected features of the Project are based on my interpretation of the GA drawings, the information supplied in the ATE, and the additional information provided by AT in response to s.92 requests.

### Section 4A: Alfriston Road

- 8.226 This section includes Alfriston Road from the eastern end of NoR 3 to just west of the Alfriston Road/ Stratford Road / Ranfurly Road roundabout either side of the intersection with Porchester Road.

#### Design and Changes to Network

- 8.227 The existing cross-section includes one general traffic lane and a cycle lane in each direction with a flush median that provides a right turn lane at the Porchester Road intersection which is controlled by signals. There is also a short slip lane for traffic turning left into Porchester Road and another for traffic turning left out of Porchester Road.
- 8.228 The Project involves narrowing the flush median and removing the cycle lanes to provide sufficient space to add a westbound lane. Both left turn slip lanes are removed and converted to standard lanes controlled by the traffic signals. These changes are forecast to result in negligible changes in the performance of the intersection.
- 8.229 Separated walking and cycling paths are enabled on both sides of Alfriston Road west of Porchester Road. East of Porchester Road a walking path is enabled on the northern side of Alfriston Road and a cycling path is enabled on the southern side, and this is considered to be appropriate given the rural environment to the east.
- 8.230 The new traffic lane arrangement is contained within the existing carriageway and the proposed expansion of the cross-section is to provide the separate walking and cycling paths on each side of the road. It appears that implementing a shared path in this section, which is further from more intensive development, may result in expansion of the road reserve only being required during construction. I invite AT to provide more information on this point for the hearing.

#### Interdependencies and Staging

- 8.231 This section appears to be largely independent of other Projects and could be implemented separately, although it would appear to be of most benefit when implemented together with the Alfriston Road section of NoR 3.

#### Property Access and Parking

- 8.232 The ATE does not identify any changes to access or parking in this section.

#### Cycle Path Safety

- 8.233 I am not concerned about the safety of cycle path users on the southern side of the road as the properties in that section have all access from side roads so there are no driveways to cross that path. I do have concerns about the safety of cyclists using the path on the northern side of the road due to the frequency of driveways.

## **Section 4B Porchester Road North**

- 8.234 This section includes Porchester Road from the intersection with Alfriston Road at the northern end to the intersection with Airfield Road. Much of this section has rural or low-intensity development along the eastern side and predominantly residential development along the western side.

### Design and Changes to Network

#### *General Cross-Section*

- 8.235 This section currently provides one general traffic lane in each direction with a flush median. Kerbside parking is available along most of this section, apart from near some intersections.
- 8.236 Paths are provided on the western side only north of Popes Road. No paths are provided between Popes Road and the Manuroa Road/ Berwyn Avenue roundabout as the area is undeveloped on both sides. South of Manuroa Road paths are provided on both sides.
- 8.237 The Project retains the single traffic lane in each direction and a median. All kerbside parking is removed and the berms are expanded to allow for separate walking and cycling paths and a grass separator on each side. The expansion of the roadsides to accommodate both paths requires the road reserve to be expanded, predominantly by around 4.0m on the eastern side.
- 8.238 The roadside cross-section as shown on the GA drawings typically provides for a narrow separation between the boundary and the 1.8m wide footpath, a narrow separator, a 2.0m wide cycle path, and a 2.4m grassed separation strip for a total berm width of around 6.8m. It would appear that a reduced provision consisting of a 0.8m separation from the boundary, a 3.0m wide shared path and a 1.0m separation strip would not require the road reserve to be expanded.
- 8.239 Given the removal and red flagging of much of the future growth areas a shared path may be sufficient to provide for the expected demands, raising some doubt about the reasonable necessity of the designation along much of this section. I invite AT to comment on this matter for the hearing.

#### *Sarteano Drive Intersection*

- 8.240 This T-intersection is currently uncontrolled and has all movements provided for, including with a right turn bay within the flush median on Porchester Road. The GA drawings show a narrow non-specific median on Porchester Road and show Sarteano Drive with a Give Way control and a lane marking arrow showing a left-turn only. The ATE does not identify any changes to the movements at this intersection, but the GA drawings suggest that the removal of right turns in and out of Sarteano Drive are likely to occur because of the Project. The impacts of that potential change have not been assessed in the ATE, and I invite AT to provide an assessment for the hearing.
- 8.241 The impact of any removal of turns depends on the availability of right turn movements at the Alfriston Road intersections with Ricardo Court and with Sarteano Drive. Provided right turns are retained at those intersections the impact of removing the right turn movements at the Porchester Road / Sarteano Drive intersection would be minor.

#### *Popes Road Intersection*

- 8.242 This crossroads intersection is currently controlled by Stop signs on both Popes Road approaches. This intersection has a poor crash record and was previously identified as a high-risk intersection. Based on the NZTA High-Risk Intersections Guide the intersection warrants a "transformative" upgrade which would include a significant change such as installing traffic signals or a roundabout.

- 8.243 The Project proposes the construction of a two-lane roundabout at this intersection, with short additional lanes on each approach and departure. Despite roundabouts typically resulting in an increase in rear-end crashes, the roundabout is expected to result in significant safety benefits, particularly a reduction in the severity of crashes.
- 8.244 The change is also expected to result in redistribution of delay with Porchester Road traffic having increased delay and Popes Road traffic having less delay, with a reduction in delay overall.
- 8.245 Busy two-lane roundabouts are significantly harder for pedestrians and cyclists to negotiate than single-lane roundabouts given that traffic can be moving continuously at roundabouts, and the crossing distances are wider.
- 8.246 The roundabout is shown as having parallel pedestrian and cyclist crossing facilities across every road, and as shown on the GA drawings, pedestrians and cyclists have priority over vehicles. The ATE also notes *“With the proposed dual lane roundabout, further safety enhancements such as raised safety platforms on the approach could be considered closer to the time of implementation to further increase safety for vulnerable road users”<sup>45</sup>*.
- 8.247 I note that while raised platforms can significantly improve the safety performance of formal (zebra) pedestrian crossings, zebra crossings on multi-lane roads typically have a poor safety record as they are vulnerable to a vehicle stopped in one lane obscuring sightlines between pedestrians and vehicles approaching in another lane. I expect the “Give Way” control used where pedestrians and cyclists cross the road in parallel have the same safety issue.
- 8.248 The only other form of crossing that could give priority to pedestrians and cyclists is crossings controlled by traffic signals. The UDE drawings state *“Signalised active mode crossing recommended on approaches to roundabout, to be confirmed at future design stage”*
- 8.249 I have significant concerns about the use of crossings controlled by traffic signals if they are located in close proximity to the roundabout. I consider such signals are likely to result in increased rear-end crashes and some drivers mistaking a green signal for assigning them priority through the roundabout resulting in an increase in crashes at the intersection. In my view if signalised active mode crossings are to be used they should be located distant from intersections.
- 8.250 The models of the intersection the ATE assessment is based on have not included the pedestrian crossings or raised platforms, and if such features are included the benefits of the roundabout for both safety and efficiency would have been significantly over-stated.
- 8.251 In my view the most appropriate way to give priority to pedestrians and cyclists at or near this intersection is to control the intersection with traffic signals instead of a roundabout and incorporate the active mode crossings into the intersection. Controlling the intersection with traffic signals instead of a roundabout is likely to make much of the additional land required at this intersection unnecessary, raising issues about the reasonable necessity and assessment of alternative methods for this intersection. I recommend that AT provide more information on this for the hearing.

*Manuroa Road / Berwyn Avenue Intersection*

- 8.252 This crossroads intersection is currently controlled by a single-lane roundabout with an external diameter of 25m, the minimum size that can accommodate right-hand and U-turns by large vehicles.
- 8.253 The Project involves retaining a single lane roundabout with an increased diameter to provide better geometry. The ATE modelling forecasts improvements in performance, predominantly in the a.m. peak.

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<sup>45</sup> Section 8.2.2, ATE.



- 8.254 The GA and UDE drawings both show active mode crossings at the roundabout. The ATE modelling does not include either option and the ATE does not address these crossings. I therefore consider the efficiency improvements assigned to the intersection may not be realised.
- 8.255 As this roundabout and the approaches to it have only one lane in each direction I do not have the same safety concerns if these crossings are priority (zebra) crossings as I do for the dual-lane Popes Road roundabout.

#### *Airfield Road Intersection*

- 8.256 The Airfield Road intersection is a crossroads currently controlled by a small 24m diameter single-lane roundabout. A zebra pedestrian crossing on a raised platform is located on the eastern Airfield Road approach and a zebra crossing without a platform is provided on the southern Porchester Road approach. An electricity transmission line pylon is located on the southwestern corner of the intersection.
- 8.257 The Project proposes a 30m diameter single-lane roundabout with active mode crossings across all approach roads. The roundabout geometry is offset towards the east which I expect is to avoid the pylon.
- 8.258 The ATE modelling forecasts significant improvements in performance during both peak periods which appears to be due in part to the Project having fewer vehicles passing through it at those times, particularly vehicles approaching along Airfield Road from the east. The ATE models do not represent the active mode crossings.

#### Interdependencies and Staging

- 8.259 This section of the Project appears to be largely independent of the other projects, and the changes to each of the intersections could also be undertaken independently of each other and the other parts of the Project. The apparent dependency of this Project with growth areas nearby has been noted already.

#### Property Access

- 8.260 The ATE does not expect any changes to property access as a result of the Project.
- 8.261 I expect some changes to property access arrangements may be required near the Manuroa Road and Airfield Road intersections if the active mode crossings are installed in the locations shown. Apart from those locations and the movements at Sarteano Drive noted above I have not identified any significant changes to access arrangements in this section.

#### Parking

- 8.262 The ATE notes the Project will remove all kerbside parking along this section of Porchester Road. The ATE considers this would have a minimal impact as alternative parking is expected to be available in nearby side roads.
- 8.263 In the areas that are developed side roads can be spaced approximately 300m apart, so some residents may need to have a two- or three-minute walk to the nearest available parking space.

#### Cycle Path Safety

- 8.264 In the areas of Porchester Road that are currently developed I have the same concerns about the safety of the proposed cycle paths as I do in other urban areas due to the frequency of driveway crossings and the limited sightlines available at those driveways.
- 8.265 I do not have that concern for the currently undeveloped areas. Some of the rural land adjoining Porchester Road has been removed from the FDS so I do not expect that land to be

urbanised and I expect there would be few driveways in that section. For the red flagged rural land I expect some form of urbanisation to occur, but I also expect that Council and AT are likely to have sufficient control over access arrangements so that driveway crossings of the paths are either avoided or provided with adequate sightlines.

#### **Section 4C Porchester Road / Walters Road Intersection**

- 8.266 This section includes the Porchester Road / Walters Road intersection and all four approaches.

##### Design and Changes to Network

- 8.267 This crossroads intersection is currently controlled by a small single-lane roundabout.
- 8.268 The GA drawings show the Project will replace the roundabout with traffic signals with three lanes on Walters Road and four lanes on Porchester Road. Separate walking and cycling paths are to be provided on all roads except for Porchester Road south of the intersection where a single wide path is provided on each side.
- 8.269 The installation of the traffic signals is forecast by the ATE modelling to result in large reductions in average delay despite the intersection operating at capacity in the p.m. peak hour. I expect the traffic signals to significantly improve the safety and efficiency of active mode movements across the intersection.

##### Interdependencies and Staging

- 8.270 It appears this section of the Project could be implemented separately from all other sections and Projects, although I expect it would be highly desirable to complete this change prior to or together with the grade separation of the Walters Road NIMT railway level crossing. That Takanini Level Crossings project shows the intersection controlled by a roundabout, which I address later (paragraph B.128) when responding to a submission.

##### Property Access

- 8.271 No significant changes to property access have been identified.

##### Parking

- 8.272 The Project would result in the removal of all thirty-eight on-street angle parking spaces on Walters Road east of the intersection which are located along one of the road frontages to Papakura Normal Primary School. That parking appears to be in high demand, particularly for people picking up and dropping off children at the school.
- 8.273 There is a significant amount of parking available at Bruce Pulman Park on the northern side of Walters Road approximately 200m east of Porchester Road. That parking area, which is within the park boundary and not in the road reserve, appears to be under the control of the Bruce Pulman Park Trust which has leased the park from Council. The parking area has three gates that can be locked and a sign notes the carpark is open 7:00 a.m. to 9:00 p.m.
- 8.274 I expect the parking removed from Walters Road would be displaced to Bruce Pulman Park with a corresponding increase in pedestrians using the zebra crossing located at the eastern end of the school frontage.
- 8.275 Bruce Pulman Park is used for sporting and other events, some of which may occur during school hours, and this may prevent the parking area being used by school staff or parents. The trust website notes "*Bruce Pulman Park is a sports park and has regular large sport and cultural events/tournaments held on the Park. This will often make the car park and*

*subsequent areas very busy*<sup>46</sup>. It appears possible that the park Trust may elect to remove or restrict the parking in future.

- 8.276 If that parking supply were retained and remained available in the long term, I consider there would be a moderate adverse effect on the operation of the school pick-up and drop-off activities, and a potential adverse effect on the safety of pedestrians using the zebra crossing.
- 8.277 When the Bruce Pulman Park parking area is unavailable for school-related parking the adverse effects on both safety and efficiency of the transport network could be significant during drop-off and pick-up times, along with significant inconvenience for school staff and parents, particularly as this would occur in conjunction with higher traffic volumes associated with park events. I recommend that AT provide an assessment of the effects of removing the parking near the school and measures for addressing those effects.
- 8.278 In any case I recommend that this crossing be upgraded by installing a raised platform to improve the safety of the zebra crossing or to replace the zebra crossing with a signal-controlled crossing.

#### Cycle Path Safety

- 8.279 I have concerns over the safety of the cycle path proposed along the southern side of Walters Road west of Porchester Road due to the frequency of driveways in that section, and the same concerns along the western side of Porchester Road south of Walters Road if the single path becomes a shared path.
- 8.280 I do not have concerns about the cycle path on Porchester Road north of Walters Road, the northern side of Walters Road, or the southern side of Walters Road east of Porchester Road as there are few or no driveways crossing these paths.

#### **Section 4D Popes Road**

- 8.281 This section of the Project includes Popes Road excluding the area around the intersection with Porchester Road already discussed from paragraph 8.242 above.

#### Design and Changes to Network

##### *Mid-Block Section*

- 8.282 Popes Road currently has one lane in each direction with metal shoulders, no paths, and no street lighting. The land on either side of the road is zoned Business – Light Industrial and is being redeveloped for commercial and industrial activities.
- 8.283 The Project involves constructing a slightly wider carriageway with one traffic lane in each direction and a median, plus separate walking and cycling paths on each side of the road with a grassed separator. This cross-section requires the road reserve to be expanded, and additional expansion is proposed to provide for construction.
- 8.284 It appears that adopting a shared path and a narrower separator on each side of the road may avoid the need for expanding the road reserve, other than for construction. As the surrounding area is zoned for Light Industry and the land further east is now removed from the FDS it may be possible to adopt a narrower cross-section making use of shared paths instead of separate paths. I recommend AT provide additional information on this for the hearing.

##### *Popes Road / Takanini School Road Intersection*

- 8.285 This intersection is currently a T-intersection controlled by a Give Way sign.

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<sup>46</sup> <https://www.sporty.co.nz/brucepulmanpark/FACILITIES-1/Motorhome-Park>

- 8.286 The Project proposes installing a relatively large single-lane roundabout. Active mode crossings are shown across each of the three arms. The ATE modelling, which does not represent the active mode crossings, shows the change to the intersection has a negligible impact on the overall efficiency of the intersection, with the intersection operating efficiently in both the current Give Way and the proposed roundabout form.
- 8.287 The crash record at this intersection is relatively unremarkable. The record for 2018-2022 (the same as used in the ATE) shows three crashes occurred at the intersection. One involved a vehicle losing control when turning on a wet road resulting in one minor injury, another involved a vehicle swerving to avoid an animal and hitting a tree, and another vehicle losing control and hitting a fence and electrical transformer.
- 8.288 The ATE does not provide a reason for changing the intersection to roundabout control although it notes that roundabouts are generally safer than priority-controlled intersections.
- 8.289 Given the unremarkable safety history at this intersection and the efficient operation of the existing intersection layout which is not materially improved by the proposed roundabout, the proposed change to the intersection and the expansion of the road reserve required to achieve it do not appear to be reasonably necessary. When the reduction in planned future growth in the area resulting from the FDS is considered the need for this part of the Project appears to be weaker still. The roundabout would be beneficial (only) if a raised median in Popes Road removes right turn movements from driveways. I recommend AT provide additional information on this for the hearing.

#### Interdependencies and Staging

- 8.290 Changes to Popes Road appear to be reasonably independent on the other Projects or on any other part of NoR 4.

#### Property Access

- 8.291 The only change to property access identified in the ATE is to 94 Takanini School Road, a property that is currently accessed from Takanini School Road a short distance north of Popes Road. The driveway would be located within the roundabout and the ATE recommends the driveway essentially form a fourth approach to the roundabout.
- 8.292 In my view that is undesirable as the priority of traffic leaving the driveway via a vehicle crossing relative to traffic approaching on public roads may be misunderstood by some drivers resulting in potential collisions, and other drivers may not be expecting a vehicle to slow and enter the driveway. The priorities between driveway traffic and path users may also be misunderstood.
- 8.293 For those reasons I have concerns over the safe operation of this driveway, and there appears to be no practicable alternative other than retaining the existing intersection layout.

#### Parking

- 8.294 Kerbside parking on Popes Road and on Takanini School Road near the intersection with Popes Road would be removed by the Project. Kerbside parking in this area appears to be in low demand and alternative parking is currently available elsewhere along Takanini School Road, so I consider the impact of this change to be minor.

#### Cycle Path Safety

- 8.295 I am not concerned about the safe operation of the cycle paths on Popes Road as the light industrial zoning is expected to result in large lots with few driveways coupled with good sightlines at driveways.

- 8.296 I am concerned about the safety of pedestrians and cyclists where the paths cross the driveway at 94 Takanini School Road given that property has direct access within the roundabout so could be misinterpreted as a road where vehicles have priority.

## **9 Construction Effects and Management Methods**

### **All Projects**

- 9.1 As noted above, given the longer implementation timeframes and the absence of detailed designs the general approach to effects generated by construction of the Projects is proposed to be addressed through the use of management plans.
- 9.2 All Projects involve work in operational road corridors with potential to disrupt the operation of the road network and occupants of adjacent properties.
- 9.3 The ATE has assumed that each of the Projects will be constructed separately at different times and that construction effects would not overlap. The ATE acknowledges that more than one Project could be under construction at the same time and considers this eventuality could be managed appropriately.
- 9.4 It is also possible that one or more of the Projects could be constructed at the same time as another infrastructure project in the area, and that has the potential to increase cumulative effects. For example, if works on Mill Road or the Takanini Level Crossings are undertaken at the same time the impact could be substantially greater.
- 9.5 The greatest potential for adverse effects arises from the replacement of the bridges which would require total closure of the bridge. Total closures may be limited to a few relatively short periods or may extend to a multi-year construction period. At this point AT has not determined if full closures would be required and the ATE provides an assessment of that eventuality for all except the Weymouth Road bridge over the NIMT.
- 9.6 The greatest impacts would occur if a long-term road closure for bridge replacement occurs at the same time as significant closures on other routes.
- 9.7 I consider these matters as part of each project below.
- 9.8 The ATE recommends that a Construction Traffic Management Plan (CTMP) be prepared prior to the construction of any and all of the Projects and recommends several items that each CTMP should include.
- 9.9 The ATE also provides Table 5-6 that lists sites near some of the Projects that should be given special consideration when the CTMPs are prepared, but that table is not reflected in the proposed conditions.
- 9.10 I consider that the purpose of the CTMP is adequately described, but I consider that some amendments are required to the list of matters the CTMPs should address. I address the proposed in Section 12.

### **NoR 1: Great South Road Frequent Transit Network Upgrade**

- 9.11 Most sections of this Project would have moderate effects during construction, and these would be similar to the impacts associated with similar road reconstruction works that are routinely undertaken across Auckland and that are appropriately managed by Construction Traffic Management Plans.

- 9.12 The most significant impact associated with construction of this Project is the closure of the Slippery Creek Bridge during reconstruction. AT is currently uncertain about the possible nature and duration of closure(s) of this bridge as this depends to some extent on the final design and construction methodology adopted.
- 9.13 The ATE considers the impact of a year-long closure of this bridge including likely detour routes and additional travel distance and time, principally along Sutton Road and Opāheke Road. The ATE considers that this route would be close to capacity during peak periods but that alternative routes such as Blackbridge Road and Linwood Road (5km to the west) and the Southern Motorway could also be used.
- 9.14 The current peak-period traffic volume on this section of Great South Road is in the order of 1400 vehicles per hour (v/h) in both directions and this is expected to increase significantly as the result of growth in the area. The ATE modelling of the Park Estate Road intersection has volumes of around 1600-1800 v/h in both directions with the highest one-way flow at around 1050 v/h.
- 9.15 The primary detour route of Sutton Road and Opāheke Road currently has peak hour volumes of around 800-900 v/h and I would expect this volume to be substantially higher in future.
- 9.16 Based on those volumes I consider the primary detour route would be well over capacity during much of the day when the bridge is closed resulting in significant adverse effects on safety and efficiency.
- 9.17 The secondary detour routes are also expected to be near or over capacity, so I consider closure of this bridge would have significant impacts across the Drury – Opāheke – Papakura – Hingaia area, particularly during peak periods.
- 9.18 The impact is likely to be significantly reduced if the MTAS project and/ or the new North-South Opāheke Arterial (west of the NIMT railway) is operational before the bridge is closed, as acknowledged in the ATE. As described in Section 6, the timing of those projects is uncertain.
- 9.19 The ATE recommends that a connection across Slippery Creek for all traffic is maintained throughout construction, but that could be reviewed if Mill Road or the new Opāheke arterial are operational<sup>47</sup>. I endorse that recommendation and consider it to be essential. This requirement is not reflected in the proposed conditions and is addressed in Section 12.
- 9.20 In addition, I consider the cumulative impact of simultaneous closure of both Slippery Creek bridge and Hingaia Stream bridge (NoR 2) would be significant, except during periods of low flow. As I recommend that the closure of either bridge should be avoided except during periods of low flow, simultaneous closure should only occur during those times when the cumulative effect would be minor. On that basis I consider no additional condition is required.

## **NoR 2: Great South Road Upgrade (Drury Section)**

- 9.21 The ATE has assessed a worst-case scenario of Hingaia Stream bridge being closed for the duration of the reconstruction work.
- 9.22 The ATE assessment is based on:
- a) peak-hour volumes on Hingaia Stream bridge being around 600 to 1450 v/h (maximum of 900 v/h southbound in p.m. peak);
  - b) peak-hour volumes on Norrie Road (the detour route) of 1500 to 1250 v/h (maximum of 950 v/h in p.m. peak);

<sup>47</sup> Section 5.4.1.2, ATE.

- c) capacity of one lane of 500 to 1300 vehicles per hour in one direction.
- 9.23 Based on those assumptions the ATE concludes the volume of traffic on the detour route “*will be in the upper bound of the range and will be able to accommodate the detoured traffic*” provided the separate project to upgrade the one-lane bridge over Hingaia Stream on Norrie Road to two lanes has been completed.
- 9.24 From the information supplied in the ATE, with Hingaia Stream bridge closed the traffic on the detour route in the p.m. peak is expected to be in the order of 1850v/h in north-to-west direction and 950 v/h in the opposite direction. The higher volume is well above the capacity of the mid-block sections of the route, even with the one-lane bridge widened to two lanes. In addition, I expect there could be significant delays at the intersections along the detour route. To conclude, in my opinion the only detour route has insufficient capacity to accommodate closure of the Hingaia Stream bridge during the day and would only be sufficient during periods of low flow such as overnight.
- 9.25 For that reason, in my view the daytime closure of Hingaia Stream bridge should be avoided, and the conditions modified to reflect this.
- 9.26 I expect all other construction transport effects could be suitably managed by the CTMP and other management plans.

### **NoR 3: Takanini Frequent Transit Network**

#### **Alfriston Road Bridge**

- 9.27 The ATE has considered a worst-case scenario of the bridge over the Southern Motorway on Alfriston Road being closed for the duration of the reconstruction work. The ATE determined that the available detour routes would not have sufficient capacity to accommodate the detoured traffic and/ or would involve excessive additional travel time. For that reason, the ATE recommended access is maintained during construction.
- 9.28 I agree with the ATE recommendation and consider it essential that closure of the bridge is avoided except during periods of low traffic flow such as overnight and during the Christmas – New Year holiday period.
- 9.29 I consider the proposed conditions do not adequately address this and that an additional condition is required, which is provided later in this report.

#### **Weymouth Road Bridge**

- 9.30 The ATE has not considered the closure of the Weymouth Road bridge over the NIMT railway “*due to the rail upgrade works that may occur.*”<sup>48</sup> The ATE expects this bridge will be constructed as part of the rail upgrade project and the effects managed as part of that project. I presume the ATE has not considered the effects associated with reconstruction of this bridge as it considers the reconstruction is enabled by the KiwiRail designation.
- 9.31 The AEE discusses the replacement of this bridge including it as part of the Project description<sup>49</sup>, stating the bridge replacement is enabled by the Project<sup>50</sup> and attributes the benefits of replacing the bridge to the Project. The AEE also discusses potential methods for reconstructing the bridge and notes that KiwiRail approval would be required to work in the rail corridor during defined periods<sup>51</sup>.

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<sup>48</sup> Section 7.4, ATE

<sup>49</sup> Form 18

<sup>50</sup> Page 16, AEE

<sup>51</sup> Page 46, AEE.

- 9.32 I note:
- a) the NoR shows the designation boundaries for this AT project overlapping the KiwiRail designation (6302) for the NIMT;
  - b) the bridge cross-section as shown on the AT GA drawing extends beyond the KiwiRail designation and into road corridor and AT designation on both sides of the railway;
  - c) some of the proposed AT designation may be used to facilitate construction of the bridge as suggested on the GA drawings.
- 9.33 As the AEE identifies the replacement of this bridge as part of the Project, and as work outside the KiwiRail designation appears necessary for replacement of the bridge I have included the potential effects of this bridge reconstruction in my assessment.
- 9.34 As the ATE has not considered this closure I do not have sufficient information to determine the envelope of effects, or to assess the effectiveness of the proposed conditions. I request AT provide more information about this matter for the hearing. In the absence of such information I can make a preliminary assessment.
- 9.35 The nearest alternate crossings of the NIMT are:
- a) Station Road, approximately 300m to the north, and accessed via Selwyn Road and Great South Road;
  - b) Great South Road, approximately 700m to the south, and accessed via Great South Road and Mahia Road.
- 9.36 Both alternate routes would require traffic to detour along a section of Great South Road that the ATE describes as “*highly congested*”<sup>52</sup>.
- 9.37 Given the strategic importance of the road connection across the railway at Weymouth Road to the operation of public transport services and general traffic in the area I expect that closure of the bridge at any time other than during periods of low traffic flow could be major.
- 9.38 For that reason, in the absence of more information I recommend that the closure of this bridge be avoided except during periods of low traffic flow such as overnight and during the Christmas holiday period. I note the AEE expects that approval to work in or near the rail corridor would only be given by KiwiRail during those same periods. A recommended condition is provided later in this report.

#### **NoR 4: Porchester Road and Popes Road Upgrades**

- 9.39 The changes proposed as part of this Project would disrupt traffic movements in the area but are not particularly unusual and I expect the construction effects of this Project could be adequately addressed through the proposed conditions.

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<sup>52</sup> Section 7.4.1.2, ATE.



## 10 Statutory Considerations

### National

#### Government Policy Statement on Land Transport 2020 (GPS-LT)

- 10.1 This policy is summarised and assessed in the ITA, and the four strategic priorities of the GPS-LT are assessed below.

#### Safety

- 10.2 The GPS-LT safety priority is developing a transport system where nobody is killed or seriously injured. All of the Projects provide for new and/ or improved transport links of a high standard and will generally improve safety. I do have some safety concerns in relation to the proposed cycle paths where there are frequent driveways (see paragraph 8.40), and in relation to the NoR 4 Porchester Road / Popes Road intersection and Popes Road/ Takanini School Road intersection (from paragraph 8.246).

#### Better Travel Options

- 10.3 This priority is summarised as providing people with better transport options to access social and economic opportunities. All of the Projects enable improved active mode facilities that could provide people with those transport options. The projects would also improve movement of buses and other vehicles.

#### Climate Change

- 10.4 The GPS seeks to develop low carbon transport systems that support reductions in carbon emissions while improving safety and inclusive access. The ATE describes the analysis of the project and states the Projects will collectively result in a reduction in VKT compared to a scenario where all of the development occurs in the absence of the Projects. While I consider all development occurring without the Projects to be unlikely, particularly in light of the FDS linking development of growth areas with the provision of most of the Projects, I acknowledge that the projects are likely to result in a reduction in private vehicle VKT. As a result I consider the Projects would result in fewer operational carbon emissions.

#### Improving Freight Connections

- 10.5 The GPS seeks to prioritise the improvement of freight connections for economic development. Most of the Projects would make small improvements to freight connections by improving the travel time on most links in the sub-region.

#### Summary

- 10.6 I consider each project is consistent with and gives effect to this policy statement.

#### National Policy Statement on Urban Development 2020 (May 2022) (NPS-UD)

- 10.7 The NPS-UD sets out several objectives and policies

#### Well-Functioning Urban Environments

*Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

...

- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*

- 10.8 The Projects are considered to be useful in improving accessibility by active modes and for two of the Projects by enabling improvements to public transport efficiency.

#### Infrastructure Readiness

*Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

- 10.9 The newly released Auckland FDS sets out development capacity and links this with the provision of key infrastructure including most of the Projects. I consider those Projects listed in the FDS are required to realise this policy.

#### **Emissions Reduction Plan**

- 10.10 The national Emissions Reduction Plan (**ERP**) has three focus areas for reducing transport emissions over the next 30 years.<sup>53</sup>

- *reduce reliance on cars and support people to walk, cycle and use public transport*
- *rapidly adopt low-emissions vehicles*
- *begin work now to decarbonise heavy transport and freight.*

- 10.11 The ERP sets four targets to support the focus areas:

*Target 1 – Reduce total kilometres travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities.*

*Target 2 – Increase zero-emissions vehicles to 30 per cent of the light fleet by 2035.*

*Target 3 – Reduce emissions from freight transport by 35 per cent by 2035.*

*Target 4 – Reduce the emissions intensity of transport fuel by 10 per cent by 2035.*

- 10.12 The implementation of all of the Projects is estimated to produce a reduction in VKT compared with none of the Projects being implemented but with all forecast growth still occurring. I consider the Projects to be consistent with Target 1.

## **Auckland**

### **Regional Policy Statement – Transport Matters (RPS)**

- 10.13 Relevant objectives and policies that are relevant to transport are identified below.

#### B2 Urban Growth and Form

- 10.14 This section identifies a number of issues and states:

*Growth needs to be provided for in a way that does all of the following:*

- (1) *enhances the quality of life for individuals and communities;*
- (2) *supports integrated planning of land use, infrastructure and development;*

<sup>53</sup> Pg 172, Emissions Reduction Plan, Ministry for the Environment, Wellington June 2022.

...  
(5) enables provision and use of infrastructure in a way that is efficient, effective and timely;  
(6) maintains and enhances the quality of the environment, both natural and built;  
...

10.15 These Projects could provide transport infrastructure that directly addresses issue (5). These issues are reflected in a number of objectives. I consider the most relevant objective for transport is B2.2.1 (1):

- (1) A quality compact urban form that enables all of the following:
- (a) a higher-quality urban environment;
  - (b) greater productivity and economic growth;
  - (c) better use of existing infrastructure and efficient provision of new infrastructure;
  - (d) improved and more effective public transport;
  - (e) greater social and cultural vitality;
  - (f) better maintenance of rural character and rural productivity; and
  - (g) reduced adverse environmental effects.

### B3.3 Transport

10.16 Another relevant objective for transport infrastructure is B3.3.1 (1):

- (1) Effective, efficient and safe transport that:
- (a) supports the movement of people, goods and services;
  - (b) integrates with and supports a quality compact urban form;
  - (c) enables growth;
  - (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and
  - (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.

10.17 After evaluating the Projects against the relevant objectives I consider each of the Projects is consistent with the transport objectives of the RPS, principally as NoR 1 and NoR 3 enable improved public transport, and all of the Projects enable active transport improvements and assist in providing for planned growth.

### **Auckland Plan 2050**

10.18 The AEE addresses the Auckland Plan at section 11.2.2 and considers the Projects to be well aligned with the Plan.

10.19 The RPS describes the Auckland Plan 2050 (AP) as:

*The Auckland Plan, being the spatial plan required to be prepared and adopted under sections 79 and 80 of the Local Government (Auckland Council) Act 2009 as a comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development, is a relevant statutory planning document for the preparation of the regional policy statement.*

10.20 The AP identifies six Outcomes, one of which is Transport and Access, which has three Directions and seven Focus Areas.

#### Direction 1: Maximise safety, environmental protection and emissions reduction

10.21 The AP notes that in 2020, Auckland Transport adopted Vision Zero which follows the Safe System approach. The Projects have been and will continue to be designed following the Safe System approach, and I consider the Projects will maximise safety, with the exception of some sections of cycle path, and the intersections of Porchester Road / Popes Road and Popes Road/ Takanini School Road in NoR 4.

10.22 Emissions are discussed below.

Direction 2: Better connect people, places, goods and services

10.23 The Projects provide for better connections between people, places, goods and services. The closure of Beaumonts Way at the intersection with Weymouth Road severs an existing vehicular connection, and other connections may be degraded by the removal of some property access points or the potential introduction of raised medians. I consider the Projects do improve connections overall.

Direction 3: Increase genuine travel choices for a healthy, vibrant and equitable Auckland

10.24 All Projects enable active mode facilities to be provided and NoR 1 and NoR 3 are expected to improve the operation of bus services.

Focus area 1: Make better use of existing transport networks

10.25 This focus area discusses the expense of widening roads, and making the most efficient use of the roads we have by changing the demands we put on them. The focus area proposes encouraging greater use of public transport and active modes.

10.26 Projects NoR 1 and NoR 3 enable the provision of bus lanes to encourage greater use of public transport.

Focus area 2: Target new transport investment to the most significant challenges

10.27 This focus area discusses the importance of strategic planning to make the best use of transport funding. These Projects represent that strategic planning and investment.

Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders

10.28 This focus area states, "*Reducing congestion and emissions will only be possible if more Aucklanders walk, cycle and use public transport.*" The active mode facilities enabled by all Projects and the bus lanes enabled by NoR 1 and NoR 3 are compatible with this focus.

Focus area 5: Better integrate land-use and transport

10.29 These Projects enable the transport that documents such as the FDS integrate with land use.

Focus area 6: Move to a safe transport network free from death and serious injury

10.30 This focus area discusses the goal of reducing death and injury caused by travel on the road network. The Projects improve the quality of the road network by providing safer designs, although I have safety concerns in relation to some parts of every Project.

Focus area 7: Develop a sustainable and resilient transport system

10.31 This focus area discusses the need to improve the resilience of or transport system in response to disruption, including disruption from accidents or incidents, weather events, or other changes. Projects NoR 1 and NoR 2 include replacing bridges over streams that I understand will reduce the likelihood of these roads being vulnerable to weather events, although the reconstruction of those bridges will cause considerable disruption.

Summary

10.32 I consider the Projects to all be consistent with, and give effect to, the Auckland Plan and FDS.

## Te Tāruke-ā-Tāwhiri Auckland Climate Plan

- 10.33 The climate plan is a document related to the Auckland Plan. The plan has eight priorities including Transport. The AEE addresses the Auckland Climate Plan at section 11.2.2 and considers the Projects contribute to the goals of the Plan.

### Transport

- 10.34 The plan seeks to reduce emissions from transport. It states:

*While there are many potential pathways to our goal, we need to make significant changes to:*

- *how and where we live*
- *how we conduct and power our personal travel*
- *how we transport our freight*
- *how much we travel*
- *how we grow as a region.*

- 10.35 It also states:

*The highest priority is reducing emissions generated by light passenger vehicles and commercial vehicles, given these generate about 80 per cent of on-road emissions.*

- 10.36 This priority has some Action Areas.

*Action area T1. Changing the way we all travel*

- *Encourage the use of public transport, walking and micro-mobility devices, rather than driving.*
- *Shorten private vehicle trips, and fulfil several travel needs at once including for business purposes.*
- *Choose lower emissions vehicles when purchasing, sharing, or leasing.*
- *Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures.*

- 10.37 The Projects address the first point by enabling active mode facilities and Projects NoR 1 and NoR 3 could encourage the use of public transport by enabling bus lanes.

### **Transport Emissions Reduction Pathway**

- 10.38 This document (**TERP**), endorsed by Auckland Transport and adopted by Auckland Council, is intended to give effect to the climate plan. It directs the activities of the Council and AT, describes eleven transformation areas, and provides an implementation pathway. The ATE lists the TERP in the glossary but neither the ATE or the AEE explicitly consider this document, although the AEE does consider the national emissions reduction plan and transport emissions more generally.

### Reduce Travel

- 10.39 The TERP seeks to reduce travel where possible and appropriate. One measure is “*restricting road expansion that induces light vehicle travel.*” This is based on the hypothesis that road expansion projects (new or wider roads) can stimulate additional travel, which could undermine the goal.
- 10.40 In my view that hypothesis should not in and of itself prevent widening of an existing road or the construction of a new road, as not all expansion projects induce significant additional travel, not all additional travel is undesirable, and such projects can reduce congestion and emissions.

- 10.41 The TERP seeks to use VKT as a measure of travel. VKT is a travel metric that is not readily measurable, and I consider it to be a poor proxy for transport emissions. It takes no account of the type of vehicle being used, the number of people in the vehicle, or the fuel used (and hence emissions) per kilometre of travel, which is sensitive to speed and changes in speed so highly sensitive to congestion. It also does not account for any economic or other benefits associated with the travel.
- 10.42 Additional development requires additional travel, so additional VKT is a somewhat inevitable part of enabling people and communities to provide for their social, economic and cultural well-being, health and safety.
- 10.43 Nevertheless, the ATE states that collectively the projects reduce congestion and VKT compared to the scenario with all development and none of the Projects<sup>54</sup>.

Build Up Not Out

- 10.44 One of the transformations in the area of reducing reliance on cars, is “6 *Build up not out*” which includes planning for an increase in sustainable modes, a reduction in light vehicle VKT, reducing the scale of urban expansion, and locating more intensive development in areas with good access to opportunities. The pathway includes upzoning around areas of high access.

- 10.45 The TERP states:

...

*More intensive development around places with good access to opportunities. Auckland is a rapidly growing city, and its population growth is projected to continue. To minimise transport emissions, much more growth needs to occur near existing and emerging employment hubs and in areas with good access to jobs, services and amenities, so that it is easier for people to access these opportunities via sustainable modes of transport. It is also easier and more cost-effective to deliver sustainable transport options in higher density areas.*

*More growth is also needed in locations which are best served by PT. While recent government driven changes have set a minimum level of density that councils must permit around rapid transit stations, council and the government must do more to support mixed-use urban renewal around PT stations in the near term. While quality development in an area can incentivise further development other cities are more explicitly incentivising development within the walkable catchment of their rapid transit networks, and some have set explicit targets for the proportion of new dwellings that should be located within these catchments.*

- 10.46 While the Projects partly enable expansion into greenfield rural areas, these are areas that Auckland Council has identified as being appropriate for growth. The Projects primarily facilitate the expansion of Drury and Takanini which are all locations with access to rapid transit (rail) services and employment hubs with good access to jobs, services and amenities.

**Future Development Strategy**

- 10.47 The FDS has five principles. Those most relevant to transport are summarised below.

Principle 1: Support greenhouse gas emission reduction

- 10.48 A compact urban form is seen as a critical requirement, as it reduces car dependency and vehicle kilometres travelled (VKT). This is addressed above.

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<sup>54</sup> ATE, pg 47

### Principle 3: Make efficient and equitable infrastructure investments

- 10.49 Principle 3(a) is “*Take a regional view to infrastructure investment and costs*”. In my view the assessment of the Projects has done this.

### Principle 5: Enable sufficient capacity for growth in the right place and at the right time

- 10.50 The Projects enable transport capacity for growth. In my view the Projects collectively support the FDS.

## 11 Submissions

- 11.1 This section summarises the transport matters raised in submissions, and matters raised by the Ōtara-Papatoetoe, Manurewa, Papakura, and Franklin Local Boards of Auckland Council.
- 11.2 Many of the submissions had transport concerns. Some of the transport concerns are expressed generally, and other submissions provide significant detail. I have addressed these matters project by project and topic by topic noting that several of the topics are inter-related and overlap so may be addressed together or appear in more than one section.
- 11.3 Submissions that did not raise specific transport matters are not addressed in this report. Submissions that are neutral or expressed support either in general or for a specific matter are not addressed unless there are submissions opposing the same matter.
- 11.4 As requested I have provided a brief summary of submission points for each issue along with a recommendation in Table 4, and a detailed assessment of submission points is appended at **Appendix B**.
- 11.5 In several cases I have invited AT to provide additional information about an issue and in those cases my recommended response to submission points is an interim one pending that additional information. In some cases I agree with a concern expressed by a submitter but not with (all of) the relief sought, and in those cases I may express agreement in part.

*Table 4: Overview of Transport Issues Raised in Submissions*

Issue		Number of Submissions			
		NoR1	NoR2	NoR3	NoR4
Process	Sufficiency and Clarity of Information	5	2	3	3
	Need for the Project	6		9	5
	Alternative Routes, Methods, Designs, or Extents	11	6	6	5
Permanent Effects	Property Access	4	5	11	6
	On-Street Parking	1	2	2	1
	Off-Street Parking and Movement	2	3	8	3
	Efficiency	1		2	3
	Safety	3		5	5
Construction Effects	Property Access, Movement, Parking	2	1	4	4
	Management of Effects	4	2	2	1
	Efficiency, Road Closures			3	
Other			1	1	

## NoR 1: Great South Road Frequent Transit Network Upgrade

### Process

#### Sufficiency and Clarity of Information

*Table 5: NoR 1 Issues – Process - Sufficiency and Clarity of Information*

Submitter	Point	Relief Sought	Recommendation
Bunnings Ltd	17.1a	The detail of the proposed median be provided	Agree
Pathmavatheey Govender	19.4	Request further modelling and detail on the public transport and commuter benefits that the South FTN NoR seeks e.g. increased bus services, estimated patronage for the bus lanes proposed.	Disagree
Kāinga Ora Homes and Communities	31.3	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.	Disagree
	31.7	The extents of the bus lanes are shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.	Disagree
Manurewa Business Assoc Inc	32.6	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Southmall Manurewa	33.6	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree

#### Need for the Project

*Table 6: NoR 1 Issues – Process – Need for the Project*

Submitter	Point	Relief Sought	Recommendation
Dene Worsley Bowmar Margaret Anne Bowmar Judith Louise Tompsett	5.1	Cancel or remove the NoR on 16 & 85 Great South Road, Manurewa or redesign to contain it within the existing road reserve.	Interim Agree in Part
Carl Dean Howe	16.1	We would like the plan for the lane to be abolished. Concentrate on upgrading public transport instead of wasting funds on unused cycleways.	Interim Agree in Part
Te Tāhuhu o te Mātauranga Ministry of Education	27.1	The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.	Noted
Z Energy Ltd	30.1	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission.	Interim Agree
Manurewa Business Assoc Inc	32.1	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN. Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access.	Noted



Submitter	Point	Relief Sought	Recommendation
	32.3	Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Southmall Manurewa	33.1	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Noted

### Alternatives

*Table 7: NoR 1 Issues – Process – Alternatives*

Submitter	Point	Relief Sought	Recommendation
Binay	2.1	Increase the width of the road using the opposite farm nearby.	Disagree
	2.2	Leave Great South Road/Park Road intersection/part untouched and instead make a bus lane where cars can park during off-peak times/use as a way to get onto the main road.	Disagree
Dene Worsley Bowmar Margaret Anne Bowmar Judith Louise Tompsett	5.2	Cancel or remove the NoR on 16 & 85 Great South Road, Manurewa or redesign to contain it within the existing road reserve.	Interim Agree
	5.3	Cancel or remove the NoR on 16 & 85 Great South Road, Manurewa or redesign to contain it within the existing road reserve.	Interim Agree
Fortune Building Management Ltd	6.1	Reconsider the change of the road. Better access for motorway not Great South road.	Disagree
CNS Healthcare	7.1	Put this on hold	Disagree
Wendy Gladys Wells	9.1	Make the intersection of Great South Road and Mahia Road, Manurewa safe	Agree
Carl Dean Howe	16.1	We would like the plan for the lane to be abolished. Concentrate on upgrading public transport instead of wasting funds on unused cycleways.	Interim Agree in Part
Pathmavathy Govender	19.2	Explore expanding the NoR on the Chisholm corner side of Great South Road and reducing the NoR on the residential side of Great South Road to reduce the impact of works on residential properties.	Disagree
	19.5	Request further modelling and detail on the public transport and commuter benefits that the South FTN NoR seeks e.g. projected cycleway usage. Consider a shared walkway that cyclists could use rather than a dedicated cycleway.	Interim Agree
Hansaben Patel	23.2	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners' concerns.	Interim Agree
	23.3	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners' concerns.	Interim Agree
Z Energy Ltd	30.1	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission.	Interim Agree
Manurewa Business Assoc Inc	32.3	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree

Submitter	Point	Relief Sought	Recommendation
Southmall Manurewa	33.3	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
	33.8	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree

## Permanent Effects

### Property Access

*Table 8: NoR 1 Issues – Permanent Effects – Property Access*

Submitter	Point	Relief Sought	Recommendation
Bunnings Ltd	17.1b	... the median be flushed so that access points of the Bunnings site are not affected.	Agree
Z Energy Ltd	30.4	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient: entry and exit crossings including the ability to turn right in and out of the site, tanker access to and from the site and the remote fill points, on-site manoeuvring.	Interim Agree
Manurewa Business Assoc Inc	32.5	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
	32.8	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Southmall Manurewa	33.3	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
	33.5	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
	33.8	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree

## On-Street Parking

*Table 9: NoR 1 Issues – Permanent Effects – On-Street Parking*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Pathmavathay Govender	19.1	Opposes the NoR for properties on Great South Road between Beach Road and Manse Road in its current form. Seeks explanation of how off-street parking will be maintained on residential properties affected by the NoR on Great South Road and Manse Road.	Disagree

## Off-Street Parking and On-Site Movement

*Table 10: NoR 1 Issues – Permanent Effects – Off-Street Parking and Movement*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Bronwyn Brown	11.1	That the South FTN for Papakura does not proceed.	Interim Agree in Part
TRP Brown and B Brown	13.1	That the South FTN for Papakura does not proceed.	Interim Agree in Part
Z Energy Ltd	30.4	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient: entry and exit crossings including the ability to turn right in and out of the site, tanker access to and from the site and the remote fill points, on-site manoeuvring.	Interim Agree
Manurewa Business Assoc Inc	32.8	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Southmall Manurewa	33.8	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
	33.9	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree

## Safety

*Table 11: NoR 1 Issues – Permanent Effects – Safety*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Carl Dean Howe	16.2	We would like the plan for the lane to be abolished.	Interim Agree in Part
Carl Dean Howe	16.3	We would like the plan for the lane to be abolished.	Disagree
Meenakshi Goyal	24.1	Please leave the pedestrian/grass area open the way it is and accommodate your changes within the available road outlines only.	Disagree

Z Energy Limited	30.4	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient entry and exit crossings including the ability to turn right in and out of the site, tanker access to and from the site and the remote fill points, on-site manoeuvring.	Interim Agree
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### Efficiency

*Table 12: NoR 1 Issues – Permanent Effects – Efficiency*

Submitter	Point	Relief Sought	Recommendation
Marencia du Plessis	15.3	Reject the project.	Disagree

### Construction Effects

*Table 13: NoR 1 Issues – Construction Effects*

Submitter	Point	Relief Sought	Recommendation
Restaurant Brands Ltd	22.1	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.	Interim Agree
	22.5	It is essential that landowners and occupiers are engaged with throughout the works, particularly given the reliance on management plans that are to be prepared at a later date to manage construction effects.	Agree
	22.8	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.	Interim Agree
Hansaben Patel	23.1	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners' concerns.	Disagree
Te Tāhuhu o te Mātauranga Ministry of Education	27.5	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	Agree
Z Energy Ltd	30.14	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including either amending proposed Conditions 16 (CEMP) and 19 (CTMP) to require affected parties to be engaged with to participate in the drafting of these management plans or amending the SCEMP condition (proposed Condition 9) so that this	Agree

Submitter	Point	Relief Sought	Recommendation
		requirement is clear.	

## Other

- 11.6 Several submissions relate to properties near the intersection of Great South Road/ Alfriston Road/ Weymouth Road which is affected by NoR 3 and not NoR 1. I address submission points [32.5, 32.6, 32.8, 33.3, 33.5, 33.6, 22.8 and 33.9] under NoR 3.

## Local Board Comments

### Ōtara-Papatoetoe Local Board (OPLB)

- 11.7 The OPLB supports programmes that ease congestion, allow for better movement to Manukau City Centre, and increase the usability of public transport. The Board's support is noted.

### Manurewa Local Board (MLB)

- 11.8 The MLB supports the need for improved transport mode connections and services.
- 11.9 The MLB does not support the Project using the frontage of Te Mahia Station. The KiwiRail designation at Te Mahia Station includes a relatively narrow pedestrian access link to Great South Road. The Project overlaps a small part of the KiwiRail designation to enable the provision of separated walking and cycling paths. The KiwiRail designation is already formed as a pedestrian path so there is likely to be little, if any, change as the result of the Project, so I do not support that comment.

### Papakura Local Board (PLB)

- 11.10 The PLB requests that the whole length of Great South Road (from Takanini Interchange to Drury) is designated to ensure the corridor is protected and off-road walking and cycling facilities are ensured. In my view the designation need not include areas of existing road reserve as Auckland Transport already controls that land. The NoR protects the additional land and enables, but does not ensure, the provision of off-road active mode facilities. For those reasons I do not support that comment.

### Franklin Local Board (FLB)

- 11.11 The FLB supports the Project to provide a corridor that will accommodate the features listed in the Schedule 1 description. The board's comment is noted.

## NoR 2: Great South Road Upgrade (Drury Section)

### Process

#### Sufficiency and Clarity of Information

*Table 14: NoR 2 Issues – Process – Sufficiency and Clarity of Information*

<b>Submitter Name</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Kiwi Property No.2 Ltd	7.1	Seeks that the general arrangement plan be reviewed and amended to clearly identify walking and cycling facilities on both the northern and southern sides to support the future growth and urbanisation of Drury East.	Disagree
	7.2	Seeks that Schedule 1 of the proposed conditions be amended following review of the general arrangement plan to clearly illustrate walking and cycling facilities on both the northern and southern sides.	Interim Disagree
Kāinga Ora Homes and Communities	14.3	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.	Disagree
	14.7	The extents of the bus lanes are shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.	Disagree

### Alternatives

*Table 15: NoR 2 Issues – Process – Alternatives*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Broshmik Investments Ltd and Willian Rudsits	1.1	That all works remain outside the legal boundary of 2/260 Great South Road, Drury. That retaining walls are adopted to support the road and adjoining boundary and not batter slope.	Disagree
Dunford Family Trust, David Dunford and Jayne Dunford	2.1	That all works remain outside the legal boundary of 1/260 Great South Road, Drury. Road engineer designs should adopt retaining walls and not batter slope in design around the creek.	Disagree
Blue Snow (2015) Ltd	3.2	Change the proposed designation boundary to the opposite side of Great South Road, Drury, using vacant land.	Disagree
	3.3	Design and build the 2 new lanes for the road to the south side of the existing 2 lane road.	Disagree
	3.4	Seeks that the widening the existing bridge across the Hingaia Stream be built to the south of the existing bridge, hence lining up with the Great South Road widening and Drury Interchange.	Disagree
Andromeda Miers Trust Partnership	5.1	Seeks that the majority of the road works take place on the south side of the road, or that the designated boundary does not impinge on 257 Great South Road, Drury at least in terms of the placement of cycle and pathways.	Disagree
Active Electrical Suppliers (Drury)	6.2	The logical place for the building site is the other side of Great South Road where there is space and where the additional lanes are being added.	Disagree
Kiwi Property No.2 Ltd	7.1	Seeks that the general arrangement plan be reviewed and amended to clearly identify walking and cycling facilities on both the northern and southern sides to support the future growth and urbanisation of Drury East.	Disagree
	7.2	Seeks that Schedule 1 of the proposed conditions be amended following review of the general	Interim Disagree

Submitter	Point	Relief Sought	Recommendation
		arrangement plan to clearly illustrate walking and cycling facilities on both the northern and southern sides.	

## Permanent Effects

### Property Access

*Table 16: NoR 2 Issues – Permanent Effects - Access*

Submitter	Point	Relief Sought	Recommendation
Broshmik Investments Ltd and Willian Rudsits	1.2	The traffic ingress and egress turning must be retained.	Agree
Dunford Family Trust, David Dunford and Jayne Dunford	2.3	Current vehicle traffic ingress and egress turning should not be impeded.	Agree
Andromeda Miers Trust Partnership	5.1	Seeks that the majority of the road works take place on the south side of the road, or that the designated boundary does not impinge on 257 Great South Road, Drury at least in terms of the placement of cycle and pathways.	Disagree
Active Electrical Suppliers (Drury)	6.1	Maintain access to 271 Great South Road, Drury, including private parking so that our business and neighbouring businesses can keep trading.	Agree
Carter Holt Harvey Property Ltd	8.2	Seeks that safe and efficient vehicular access to 280 Great South Road, Drury, be maintained at all times for all turning movements.	Agree

### On-Street Parking

*Table 17: NoR 2 Issues – Permanent Effects – On-Street Parking*

Submitter	Point	Relief Sought	Recommendation
Broshmik Investments Ltd and Willian Rudsits	1.2	The traffic ingress and egress turning must be retained.	Agree
Dunford Family Trust, David Dunford and Jayne Dunford	2.2	Public roadside car parking is retained at 1/260 Great South Road, Drury.	Agree

### Off-Street Parking and On-Site Movement

*Table 18: NoR 2 Issues – Permanent Effects – Off-Street Parking and Movement*

Submitter	Point	Relief Sought	Recommendation
Blue Snow (2015) Ltd	3.1	Seeks the proposed designation boundary be redrawn along the submitter's existing property boundary to the south of the submitter's buildings parallel to the existing road (refer drawing page 5 of submission).	Interim Agree
Andromeda Miers Trust Partnership	5.1	Seeks that the majority of the road works take place on the south side of the road, or that the designated boundary does not impinge on 257 Great South Road, Drury at least in terms of the placement of cycle and pathways.	Disagree
Active Electrical Suppliers (Drury)	6.1	Maintain access to 271 Great South Road, Drury, including private parking so that our business and neighbouring businesses can keep trading.	Agree

## Construction Effects

*Table 19: NoR 2 Issues – Construction Effects*

Submitter	Point	Relief Sought	Recommendation
Blue Snow (2015) Ltd	3.1	Seeks the proposed designation boundary be redrawn along the submitter's existing property boundary to the south of the submitter's buildings parallel to the existing road (refer drawing page 5 of submission).	Interim Agree in Part
Te Tāhuhu o te Mātauranga Ministry of Education	11.3	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.	Agree
	11.5	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	Agree
Drury Tires / Drury Hills Trust	15.2	Seeks that impacts on 257 Great South Road, Drury are mitigated by locating the majority of the roadworks on the right-hand [south] side where the existing bridge is situated.	Disagree

## Local Board Comments

### Ōtara-Papatoetoe Local Board (OPLB)

- 11.12 The OPLB supports programmes that ease congestion, allow for better movement to Manukau City Centre, and increase the usability of public transport. The Board's support is noted.

### Franklin Local Board (FLB)

- 11.13 The FLB supports the Project to provide a corridor that will accommodate the features listed in the Schedule 1 description. The Board's comment is noted.



## NoR 3: Takanini Frequent Transit Network

### Process

#### Sufficiency and Clarity of Information

*Table 20: NoR 3 Issues – Process – Sufficiency and Clarity of Information*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Manurewa Business Assoc Inc	16.6	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Southmall Manurewa	17.6	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Kāinga Ora Homes and Communities	39.3	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.	Disagree

#### Need for the Project

*Table 21: NoR 3 Issues – Process – Need*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
ChanLong Lim	8.1	Submitter does not want their land to be cut.	Interim Disagree
Awdisho Khamis and 30 Signatories	10.2	Stop this project.	Interim Disagree
George Khamis	11.2	Stop this project.	Interim Disagree
McDonald's Restaurants NZ Ltd	15.9	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.	Interim Disagree
Manurewa Business Assoc Inc	16.1	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Noted
Southmall Manurewa	17.1	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Noted
Harpartap Singh Kalra and Anjana Kalra	19.1 19.3	The NoR should be withdrawn as the Council is currently scrapping its cycleway projects.	Disagree Interim Disagree
KiwiRail Holdings Ltd	31.1	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.	Noted
Kāinga Ora Homes and Communities	39.1	Supports the NoR in part subject to the relief sought and matters raised in the submission being addressed.	Noted

## Alternatives

Table 22: NoR 3 Issues – Process – Alternatives

Submitter	Point	Relief Sought	Recommendation
Christopher Digby and Patricia Margaret Ward	3.1	Removal of NoR on 16 Alfriston Road.	Interim Disagree
Wassil Chiba	7.1	Remove the strip lane in the middle and that will do the job.	Interim Disagree
McDonald's Restaurants NZ Ltd	15.4	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.	Interim Agree
Restaurant Brands Ltd	27.2	The submitter opposes the NoR being confirmed in its current form and seeks the requirement is not confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.	Interim Agree
	27.5		Interim Agree in Part
Tibetan Residential Ltd	29.1	Seeks that the proposed designation be altered such that only that area of 7 Alfriston Avenue, Manurewa, as required for road widening is affected as per abutting properties, or, preferably, early acquisition of the entirety of the site immediately, or such other relief as may be appropriate.	Interim Disagree
Kāinga Ora Homes and Communities	39.7	The extent of the bus lanes is shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.	Disagree
	39.8	Amend Condition 12 Urban and Landscape Design Management Plan to provide for buses and a more integrated, efficient and higher-capacity public transport network and amend 12(g): "The ULDMP(s) shall include: (iii)...(f) Integration of passenger transport <u>including the provision of dedicated bus lanes and demonstrating that direct bus services can occur through major intersections.</u>	Disagree

## Permanent Effects

### Property Access

Table 23: NoR 3 Issues – Permanent Effects - Access

Submitter	Point	Relief Sought	Recommendation
Manurewa Business Assoc Inc	16.3	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
	16.5		Interim Agree
	16.8		Interim Agree
Southmall Manurewa	17.3	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and	Interim Agree
	17.5		Interim Agree
	17.8		Interim Agree

Submitter	Point	Relief Sought	Recommendation
		attractiveness of the area.	
Harpartap Singh Kalra and Anjana Kalra	19.2	The NoR should be withdrawn as the Council is currently scrapping its cycleway projects.	Disagree
Nitinkumar Patel	22.3	Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.	Disagree
Accessible Properties Ltd	25.1	Alter the proposed designation boundary so it sits outside the boundary of 59-59C Alfriston Road and does not impact ongoing activities of the tenancies.	Disagree
	25.2	If the proposed designation boundary is not altered, relief sought includes for Condition 1: Project Description and Concept Plans are to provide clarity on the proposed works, so that the potential effects can be understood, particularly on 59C Alfriston Road.	Interim Disagree
The National Trading Company of New Zealand	26.3	The NoR be accepted provided that the designation is amended and conditions imposed to ensure that Weymouth Road access to 185 Great South Road, Manurewa comprising the New World Southmall complex, providing full turning capacity, is clearly identified as being reinstated and retained in its current form.	Interim Agree
	26.4	The NoR be accepted provided that conditions are imposed to ensure that there will be no long-term (i.e. post construction) effects on any of the existing vehicle access to and egress from 185 Great South Road, Manurewa comprising the New World Southmall complex, and that these will be retained largely in their current form following completion of construction.	Interim Agree
	26.5	The submitter seeks the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex be clearly identified in the General Arrangement Plan as being reinstated and retained in its current form.	Interim Agree
	26.6	The submitter seeks that the Requiring Authority install signals at the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex.	Disagree
Restaurant Brands Ltd	27.4	The submitter opposes the NoR being confirmed in its current form and seeks the requirement is not confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.	Interim Disagree

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Fire and Emergency New Zealand	28.1	The submitter seeks that any proposed changes to the Manurewa Fire Station site and the immediate roading network are designed with full and transparent collaboration with the submitter to ensure any changes do not delay or impede response to an incident, nor increase the risk to the safety of fire fighters and the public during a response.	Interim Agree
TCK Wong Doo Trust	30.1	Seeks unimpeded pedestrian and vehicular access for 2 Weymouth Road for the tenant's customer and staff and including for the drive-through service.	Interim Disagree
A and M Self	32.4	Seeks that the NoR not go ahead or if it goes ahead and designations are not put on title until the project has funding. If the NoR proceeds, seeks that the median lane will be flush to enable cars to access and egress from 52A Alfriston Road, Manurewa in both directions; provide details on how the project will improve safety and practicability for cars getting in and out of driveways and showing how the wide kerb with walking and cycling and bus lane will be crossed for easy access in and out of driveway.	Interim Agree in Part
Z Energy Ltd	38.2	Decline the NoR in its current form or amend to avoid, remedy or mitigate all matters of concern raised in the submission, including minimising the encroachment of the designation boundary into the submitter's sites and ensuring that any temporary or permanent effects do not impact the ability to safely operate, including with regard to access/egress, all-vehicle manoeuvring, parking, stormwater treatment and drainage, storage of hazardous substances, the forecourt canopy, signage and landscaping.	Interim Agree
	38.3	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient: entry and exit crossings including the ability to turn right in and out of the site, tanker access to and from the site and the remote fill points, on-site manoeuvring.	Interim Agree

### On-Street Parking

*Table 24: NoR 3 Issues – Permanent Effects – On-Street Parking*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Mayvan Holdings Ltd	6.1	Seeks that the current street parking spaces be maintained to mitigate loss of parking for customers and loading/unloading of goods.	Disagree
A and M Self	32.8	NoR not go ahead or if it goes ahead seeks amendments: reinstate free public car parks in residential areas to allow for a balanced approach to transport.	Disagree

## Off-Street Parking and On-Site Movement

*Table 25: NoR 3 Issues – Permanent Effects – Off-Street Parking and Movement*

Submitter	Point	Relief Sought	Recommendation
Rajesh Jai Singh	1.2	Don't need any extra line and don't want to lose land.	Interim Agree in Part
Prem Chand and Savita Chand	9.1	Submitter opposes the NoR.	Disagree
Southmall Manurewa	17.9	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	Interim Agree
Nitinkumar Patel	22.1	Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.	Interim Disagree
Mahendra Kumar	23.2	Prior to improving the infrastructure on Alfriston Road, consider the existing infrastructure. There is no point in improving the road infrastructure when the bridge acts as a bottleneck from both sides.	Disagree
The National Trading Company of New Zealand	26.1	The NoR be accepted provided the designation is amended to avoid the need for any land take from 185 Great South Road, Manurewa comprising the New World Southmall complex, or in the event that a land take cannot be avoided that this is minimised to the greatest extent possible.	Agree in part
	26.2	The submitter seeks replacement carparking spaces be provided by the requiring authority to offset those lost to the designation.	Agree in part
Restaurant Brands Ltd	27.5	The submitter opposes the NoR being confirmed in its current form and seeks the requirement is not confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.	Interim Agree
A and M Self	32.8	NoR not go ahead or if it goes ahead seeks amendments: reinstate free public carparks in residential areas to allow for a balanced approach to transport.	Disagree
Z Energy Ltd	38.2	Decline the NoR in its current form or amend to avoid, remedy or mitigate all matters of concern raised in the submission, including minimising the encroachment of the designation boundary into the submitter's sites and ensuring that any temporary or permanent effects do not impact the ability to safely operate, including with regard to access/egress, all-vehicle manoeuvring, parking, stormwater treatment and drainage, storage of hazardous substances, the forecourt canopy, signage and landscaping.	Interim Agree

Submitter	Point	Relief Sought	Recommendation
	38.3	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient: entry and exit crossings including the ability to turn right in and out of the site, tanker access to and from the site and the remote fill points, on-site manoeuvring.	Interim Agree

### Efficiency

*Table 26: NoR 3 Issues – Permanent Effects - Efficiency*

Submitter	Point	Relief Sought	Recommendation
Awdisho Khamis and 30 Signatories	10.4	Stop this project.	Disagree
George Khamis and 30 Signatories	13.4	Submitter is against this project.	Disagree

### Safety

*Table 27: NoR 3 Issues – Permanent Effects - Safety*

Submitter	Point	Relief Sought	Recommendation
Rajnish Jai Singh	1.2	Don't need any extra line and don't want to lose land.	Disagree
Prem Chand and Savita Chand	9.1	Submitter opposes the NoR.	Disagree
Pravin Umaria and Praveena Umaria	18.2	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers' money elsewhere where it is more urgently required than on Alfriston Road.	Disagree
Nitinkumar Patel	22.2	Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.	Disagree
A and M Self	32.4	Seeks that the NoR not go ahead or if it goes ahead and designations are not put on title until the project has funding. If the NoR proceeds, seeks that the median lane will be flush to enable cars to access and egress from 52A Alfriston Road, Manurewa in both directions; provide details on how the project will improve safety and practicability for cars getting in and out of driveways and showing how the wide kerb with walking and cycling and bus lane will be crossed for easy access in and out of driveway.	Interim Agree in Part

## Construction Effects

Table 28: NoR 3 Issues – Construction Effects

Submitter	Point	Relief Sought	Recommendation
Awdisho Khamis and 30 Signatories	10.4	Stop this project.	Agree in Part
George Khamis and 30 Signatories	13.4	Submitter is against this project.	Agree in Part
Pravin Umaria and Praveena Umaria	18.4	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers' money elsewhere where it is more urgently required than on Alfriston Road.	Agree in Part
Accessible Properties Ltd	25.3	If the proposed designation boundary is not altered, relief sought includes for Condition 19: Construction Traffic Management Plan shall specify that access to the property is always retained, including for emergency services to all tenancies at 59-59C Alfriston Road.	Disagree
The National Trading Company of New Zealand	26.7	That the NoR be accepted provided that conditions are imposed to ensure that adverse effects on access to and egress from 185 Great South Road, Manurewa comprising the New World Southmall complex, are minimised as far as practicable during construction.	Agree
	26.8	That the NoR be accepted provided that conditions are imposed to ensure that prior to the commencement of construction in the vicinity of 185 Great South Road, Manurewa comprising the New World Southmall complex, a construction traffic management plan apply to the road network in the immediate vicinity of the site is prepared by the requiring authority in consultation with the submitter, provided to Council along with details of the submitter's observations and comments on the plan; and approved by the Council.	Agree
Restaurant Brands Ltd	27.8	The submitter opposes the NoR being confirmed in its current form and seeks the requirement is not confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.	Agree in part
A and M Self	32.5	Seeks a schedule of temporary traffic management phases and details of alternative routes to be used if access to 52A Alfriston Road is blocked with construction.	Disagree
Te Tāhuhu o te Mātauranga Ministry of Education	36.3	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.	Agree
	36.5	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	Agree

## Other

*Table 29: NoR 3 Issues – Other*

Submitter	Point	Relief Sought	Recommendation
KiwiRail Holdings Ltd	31.3	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.	Agree
	31.4	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions. Seeks ongoing dialogue and engagement before and during detailed design starts.	Agree

## Local Board Comments

### Otara-Papatoetoe Local Board (OPLB)

- 11.14 The OPLB supports programmes that ease congestion, allow for better movement to Manukau City Centre, and increase the usability of public transport. The Board's support is noted.

### Manurewa Local Board (MLB)

- 11.15 The MLB is concerned at "*the proposed removal of the thoroughfare along Beaumont's Way to Mahia Road.*" I take the reference to Mahia Road to mean Weymouth Road. I have addressed this closure earlier and consider the effects to be relatively minor so do not support that comment.
- 11.16 The MLB is unclear "*what structure a 'berm' would look like and whether it would keep cyclists totally safe from buses.*" A berm is described at the beginning of this report and is a grass strip. A berm could not keep cyclists totally safe from any vehicles, but increased separation between the carriageway and the cycle path would provide some safety benefit.
- 11.17 The MLB is unclear if the NIMT railway overbridge on Weymouth Road will be widened or the road will have a different configuration. As addressed above, I understand the existing bridge will be replaced with a new bridge which will be wider and provide four traffic lanes instead of the two lanes on the existing bridge.
- 11.18 The MLB seeks clarification on why the properties at the corner of Alfriston Road and Magic Way are required in full. I note that the proposed cross-section appears to extend to the front of the dwelling on one of the properties and that a sizeable batter slope is proposed that overlaps the dwelling. The reason for all of both properties is not clear to me from the information provided. I note the concern of the MLB and invite AT to provide more information, including alternative methods including the use of a shared path that may reduce the effects on these properties.
- 11.19 The MLB is concerned about the proposed four-laning of the motorway overbridge and the potential impact on residents of Brough Road. The Board notes there is no indication as to whether this [intersection] will be controlled by signals. The GA drawings show this intersection would be controlled by a Stop sign. The ability to turn right in and out of this side road is unclear due to the lack of certainty around the proposed median. I note the concern of the board and request AT to provide more information on this matter at the hearing.

### Franklin Local Board (FLB)

- 11.20 The FLB supports the Project to provide a corridor that will accommodate the features listed in the Schedule 1 description. The board's comment is noted.



## NoR 4: Porchester Road and Popes Road Upgrades

### Process

#### Sufficiency and Clarity of Information

*Table 30: NoR 4 Issues – Process – Sufficiency and Clarity of Information*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Alda Investments Ltd	16.3	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.	Disagree
	16.11		Disagree
D E Nakhle Investment Trust	17.11	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.	Disagree
Kāinga Ora Homes and Communities	24.3	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.	Disagree

#### Need for the Project

*Table 31: NoR 4 Issues – Process – Need*

<b>Submitter</b>	<b>Point</b>	<b>Relief Sought</b>	<b>Recommendation</b>
Akalmurat Singh Hora	10.5	Seeks re-evaluation of the necessity of the underused cycle land and consider repurposing the area to facilitate an improved bus service.	Interim Agree
Zabeel Investments Ltd	15.2	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.	Interim Agree
	15.9		Interim Agree in Part
D E Nakhle Investment Trust	17.1	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require an appropriate roading design that caters for realistic future demand and recognises the value and importance of existing investment, minimises intrusions upon private land and eliminates the designation from 164-166 Porchester Road.	Interim Agree in Part
Pritesh Singh	19.1	Does not seek any recommendations.	Interim Agree
Te Tāhuhu o te Mātauranga Ministry of Education	22.1	The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.	Noted

## Alternatives

*Table 32: NoR 4 Issues – Process – Alternatives*

Submitter	Point	Relief Sought	Recommendation
Dianne and Neville Smith	5.3	The submitter supports the upgrade of the intersection of Porchester and Popes Road but feel that traffic lights would be more suitable for this intersection.	Interim Agree
Continuous Spouting Auckland	6.2	Seeks adjustment of the model to remove the designated earthworks from the plan as affects 94 Takanini School Road and removal of the blue hatched area. The opposite side of Takanini School Road would be better suited as a temporary construction area and place to store machinery and equipment.	Interim Agree
Graeme & Anna Goldring	7.4	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.	Interim Agree
Zabeel Investments Ltd	15.4	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354	Interim Agree in Part
	15.5	Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.	Disagree
	15.7		Interim Agree
Kāinga Ora Homes and Communities	24.7	The extent of the bus lanes is shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.	Disagree
	24.8	Amend Condition 12 Urban and Landscape Design Management Plan to provide for buses and a more integrated, efficient and higher-capacity public transport network and amend 12(g): "The ULDMP(s) shall include: (iii)...(f) Integration of passenger transport including the provision of dedicated bus lanes and demonstrating that direct bus services can occur through major intersections.	Disagree

## Permanent Effects

### Property Access

*Table 33: NoR 4 Issues – Permanent Effects - Access*

Submitter	Point	Relief Sought	Recommendation
Graeme & Anna Goldring	7.3	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.	Interim Agree
Akalmurat Singh Hora	10.2	Seeks the concerns mentioned in the submission are considered.	Interim Agree
BJ Wallace Trust and SJ Wallace Trust	14.4	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.	Interim Disagree
Zabeel Investments Ltd	15.11	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.	Interim Agree in Part
Danielle Evans	21.1	Seeks more details around the duration of the project and assurance about how the property will be left.	Interim Disagree

Submitter	Point	Relief Sought	Recommendation
Te Tāhuhu o te Mātauranga Ministry of Education	22.9	Seeks amendments to address the extent of the designation into Papakura Normal School.	Disagree

### Parking

*Table 34: NoR 4 Issues – Permanent Effects – Parking*

Submitter	Point	Relief Sought	Recommendation
Continuous Spouting Auckland	6.2	Seeks adjustment of the model to remove the designated earthworks from the plan as affects 94 Takanini School Road and removal of the blue hatched area. The opposite side of Takanini School Road would be better suited as a temporary construction area and place to store machinery and equipment.	Interim Agree
Te Tāhuhu o te Mātauranga Ministry of Education	22.9	Seeks amendments to address the extent of the designation into Papakura Normal School.	Agree in Part

### Efficiency

*Table 35: NoR 4 Issues – Permanent Effects – Efficiency*

Submitter	Point	Relief Sought	Recommendation
Hemant Hemant	2.1	Seeks that the use of Stratford Road by Tipper trucks using the Hill Road exit from the motorway is stopped.	Disagree
Akalmurat Singh Hora	10.6	Seeks traffic flow improvement: address the bottleneck issue at the bridge over the motorway to ensure traffic flow efficiency.	Interim Agree
Simon and Julie Fleming	18.4	Seeks remedies to their concerns and that the submitter's property at 3 Sheriff Place is not devalued or damaged and their quality of life is not affected.	Disagree

### Safety

*Table 36: NoR 4 Issues – Permanent Effects – Safety*

Submitter	Point	Relief Sought	Recommendation
Dianne and Neville Smith	5.4	Seeks that the construction zone around their dwelling at 52 Popes Road is minimised and wishes to retain ownership of as much of their land as possible.	Disagree
	5.5	Seeks some sort of concrete barrier/fence at the closest corner of their dwelling at 52 Popes Road.	Disagree
Graeme & Anna Goldring	7.3	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.	Interim Agree
Akalmurat Singh Hora	10.4	Seeks relocation of bus stop to the back of 11 or 13 Zoe Ct or in proximity to 170 Alfriston Road ensuring safety and privacy concerns are addressed.	Disagree
Zabeel Investments Ltd	15.6	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.	Agree in Part
Mimico Properties Limited	20.1	Seeks that the NoR be declined.	Interim Disagree

## Construction Effects

*Table 37: NoR 4 Issues – Construction Effects*

Submitter	Point	Relief Sought	Recommendation
Continuous Spouting Auckland	6.2	Seeks adjustment of the model to remove the designated earthworks from the plan as affects 94 Takanini School Road and removal of the blue hatched area. The opposite side of Takanini School Road would be better suited as a temporary construction area and place to store machinery and equipment.	Interim Agree in Part
Zabeel Investments Ltd	15.27	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.	Disagree
Alda Investments Ltd	16.20	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.	Disagree
	16.5	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that secure access for residents, including by emergency services, during construction.	Disagree
	16.6	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that provide a safe pedestrian environment on the upgraded roads adjacent to 164-166 Porchester Road.	Disagree
D E Nakhle Investment Trust	17.20	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.	Disagree
	17.5	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that secure access for residents, including by emergency services, during construction.	Disagree
	17.6	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that provide a safe pedestrian environment on the upgraded roads adjacent to 164-166 Porchester Road.	Disagree
Te Tāhuhu o te Mātauranga Ministry of Education	22.11	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.	Agree
	22.3	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.	Agree

Submitter	Point	Relief Sought	Recommendation
	22.5	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	Agree

## Other

*Table 38: NoR 4 Issues – Other*

Submitter	Point	Relief Sought	Recommendation
Te Tāhuhu o te Mātauranga Ministry of Education	22.12	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.	Agree

## Local Board Comments

### Otara-Papatoetoe Local Board (OPLB)

- 11.21 The OPLB supports programmes that ease congestion, allow for better movement to Manukau City Centre, and increase the usability of public transport. The Board's support is noted.

### Franklin Local Board (FLB)

- 11.22 The FLB supports the Project to provide a corridor that will accommodate the features listed in the Schedule 1 description. The board's comment is noted.

## 12 Proposed Conditions

- 12.1 The conditions proposed by AT are appended to the Form 18 notices.

### Existing Property Access

- 12.2 Condition 15 Existing property access applies to all Projects. As proposed the condition requires consultation and requires the Outline Plan to demonstrate how safe access will be provided.
- 12.3 As proposed the condition wording could result in an access that may not provide for movement of all vehicles used on a property, such as large truck and trailer vehicles. I consider the condition should be amended to require the access to be adequate. I recommend the wording of this condition be amended as follows:

#### **13. Existing property access**

Prior to submission of the Outline Plan, consultation shall be undertaken with landowners and occupiers whose vehicle access to their property will be altered by the project. The Outline Plan shall demonstrate how safe **and fit for purpose** reconfigured or alternate access will be provided, unless otherwise agreed with the landowner.

## Construction Traffic Management Plan

- 12.4 All Project Outline Plans are required to include a Construction Traffic Management Plan (CTMP) and the requirements for CTMPs are set out in Condition 19.
- 12.5 In my view the stated objective of the management plan is appropriate.
- 12.6 I recommend the following changes, based on the notified conditions. I have included the changes requested in the MoE submissions except where noted above.

### 19. Construction Traffic Management Plan (CTMP)

- (a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP shall include:
- (i) methods to manage the effects of temporary traffic management activities on traffic;
  - (ii) measures to ensure the safety of all transport users;
  - (iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours to manage vehicular and pedestrian traffic near **educational facilities schools** or to manage traffic congestion;
  - (iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;
  - (v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including **public transport service**, pedestrians and cyclists;
  - (vi) methods to maintain access to **and within** property and/or private roads where practicable, or to provide alternative access arrangements when it will not be;
  - (vii) methods to maintain, as far as practicable, parking and loading areas within properties;**
  - (viii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads;
  - ~~(viii)~~ **ix** methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/\_public/\_stakeholders/ emergency services);
  - ~~(ix)~~ **auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;**
  - (x) details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and

(xi) details of any measures proposed to be implemented in the event of thresholds identified in (ix) being exceeded.

**(b) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;**

## Bridge Closures

### NoR 1: Great South Road FTN – Slippery Creek Bridge

- 12.7 The ATE recommends that Slippery Creek Bridge maintain connections for general traffic, public transport, and active modes at all times. The ATE recommends the closure of Slippery Creek Bridge could be reviewed in the event the Mill Road and/ or N-S Opāheke Arterial projects are operational. I agree with those recommendations, which are not reflected in the proposed conditions.
- 12.8 In the proposed conditions the CTMP is required to include identified detour routes. I do not consider that to be sufficient to avoid the significant adverse effects that would arise from closure of this bridge.
- 12.9 I consider it could be appropriate for the bridge to be closed during periods of low traffic flow such as overnight and over the Christmas-New Year holiday period. It may also be appropriate for the bridge to be closed for longer periods provided one or both of the new road corridors are operational. At other times, the closure of the bridge should be avoided.
- 12.10 For that reason I consider the additional condition below is necessary. Although the FDS lists “Mill Road” as a prerequisite for development of some areas (see paragraph 6.25), the nature of that project has changed over recent years. The MTAS project is expected to address safety and active modes, but not increase the north-south vehicle capacity proposed for the original Mill Road project. Likewise, the North-South Opāheke Arterial is not clearly defined in any formal documents. For that reason the proposed condition only refers to additional north-south arterial road general traffic capacity, and an advice note is proposed.

### **XX. Slippery Creek Bridge (NoR 1)**

- (a) **A connection across Slippery Creek with sufficient capacity for all vehicles and active modes shall be maintained in both directions at all times, except for:**
- (i) **Overnight closures between the hours of 8pm and 6am; or**
- (ii) **Closures between 27 December and 10 January.**
- (b) **If expanded or new alternate routes providing additional general traffic capacity between Drury and Papakura are operational at the time demolition of the existing Slippery Creek bridge is due to commence, the closure periods may be extended subject to the preparation and certification by Council of a Detour Capacity Assessment Plan.**
- (c) **The objective of the Detour Capacity Assessment Plan required by (b) is to avoid adverse effects on the safe and efficient operation of the transport network when the Slippery Creek bridge is closed. To achieve the objective the Detour Capacity Assessment Plan shall provide:**
- (i) **proposed bridge closure schedule(s);**

- (ii) hourly traffic volumes currently crossing the bridge during the hours of proposed closure(s), including separately counted cyclists, light vehicles and heavy vehicles;
  - (iii) hourly traffic volumes using proposed detour routes and likely alternate routes during the hours of proposed closure(s);
  - (iv) projected traffic volumes on proposed detour routes and likely alternate routes during bridge closure(s);
  - (v) analysis of network efficiency, including modelling of key intersections, and analysis of mid-block locations and level crossings, where the hourly volume of any individual movement is projected to increase by five percent or more, with output including projected average delay, and queue lengths on a per-movement basis;
  - (vii) analysis of impacts on road safety arising from increased traffic volumes on detour routes, including for active mode users;
  - (viii) details of any measures to address adverse safety or efficiency effects arising from the bridge closure(s); and
  - (ix) details of measures to address disruption, diversion, or other changes to public transport services;
- (d) The Detour Capacity Assessment Plan required by (b) shall:
- (ii) Be submitted to Council for certification at least 20 working days prior to the commencement of demolition and/or construction work on the bridge; or
  - (iii) shall form a part of the CTMP that must be submitted to Council as a part of the Outline Plan required under condition 7.

*Advice Note: Additional general traffic lanes on the Mill Road corridor and/ or a new north-south Opāheke arterial are expected to provide expanded or new alternate routes with additional general traffic capacity.*

## **NoR 2: Great South Road Upgrade – Drury Section – Hingaia Stream Bridge**

- 12.11 The ATE considers the detour route comprising Firth Street and Norrie Road would have sufficient capacity to accommodate traffic detoured by closure of the Hingaia Stream bridge on Great South Road provided the Hingaia Stream bridge on Norrie Road is widened to two lanes.
- 12.12 I consider the detour route, with the one-lane bridge replaced, would not have sufficient capacity except during periods of low flow such as overnight and during the Christmas holiday period. I consider the proposed CTMP condition is insufficient to address the adverse effects and an additional condition is required to ensure closure of the bridge during times of higher flow is avoided.

### **XX. Hingaia Stream Bridge (NoR 2)**

- (a) A connection across Hingaia Stream at Great South Road with sufficient capacity for all vehicles and active modes shall be maintained in both directions at all times, except during the following times provided the Norrie Road bridge is widened to two lanes:



- (i) Overnight closures between the hours of 8pm and 6am; or
  - (ii) Closures between 27 December and 10 January.
- (b) Closure of the Hingaia Stream bridge shall be avoided at any time if the Norrie Road bridge has not been widened to two lanes.

**NoR 3: Takanini FTN – Weymouth Road and Alfriston Road Bridges**

- 12.13 The ATE considers the detour routes available if the Alfriston Road bridge is closed would have insufficient capacity and closure of this bridge should be avoided. I agree and do not consider the proposed conditions are sufficient to avoid the major adverse effects that closure of this bridge could generate.
- 12.14 The ATE does not consider closure of the Weymouth Road bridge, and I expect assessment of the potential detour routes would, like the Alfriston Road bridge, show the detour routes have insufficient capacity, except during periods of low traffic flow.
- 12.15 For those reasons I consider an additional condition is required.

**XX. Bridge Reconstruction (NoR 3)**

**A two-directional connection across the Southern Motorway at Alfriston Road, and a two-directional connection across the North Island Main Trunk railway at Weymouth Road, with sufficient capacity for all vehicles and active modes shall be maintained at all times, except for:**

- (a) Overnight closures between the hours of 8pm and 6am; or
- (b) Closures between 27 December and 10 January.

## **13 Conclusions and Recommendations**

### **Areas of Concern**

- 13.1 I have significant concerns about the potential for significant and widespread adverse effects on the efficient operation of the road network in the event the Slippery Creek, Hingaia Stream, Weymouth Road, or Alfriston Road bridges are closed during reconstruction. Closure of those bridges should be avoided except during periods of low traffic flow such as overnight or around New Years Day.
- 13.2 I have some concern that the recent changes to forecast growth in the FDS have reduced the need for some Projects, particularly NoR 3 and NoR 4, potentially to the point where those Projects are no longer reasonably necessary.
- 13.3 I have significant concerns about the safety of active mode crossings at or near the NoR 4 Porchester Road / Popes Road intersection and consider the assessment of alternative methods for this intersection is inadequate.
- 13.4 I have moderate concerns about the safety of the proposed changes at the NoR 4 Popes Road / Takanini School Road intersection and consider the changes are not reasonably necessary.
- 13.5 I have moderate concerns about the safety of cycle paths proposed for NoR 1, NoR 3, and parts of NoR 4, and that these paths could be contrary to the Project Objectives, raising

concerns about the reasonable necessity of the requirements for additional land to provide the cycle paths.

- 13.6 I have moderate concerns about the reduction in safety arising from the removal of flush medians for NoR 1 and NoR 3 which provide safety benefits for pedestrians and for vehicles turning at side roads and driveways.
- 13.7 I have moderate concerns that some properties will have parking and/ or access removed by the NoR 3 Project that has not been identified or assessed in the notification material.
- 13.8 I have minor concerns that an appropriate range of alternate methods have not been considered for reducing the impact on some properties, for all of the NoRs. These include options for dealing with height differences including embankments, retaining walls and other structures.

### **Additional Information**

- 13.9 In the course of considering the merits and effects of the Projects in detail, and in the course of responding to points raised by submitters, the need for more information to be provided has arisen. As noted elsewhere in the absence of that information I have made an interim recommendation on submission points, and my recommendations may change in light of any new information. I recommend that additional information be provided by the Requiring Authority for the hearing in relation to the following.
- 13.10 For all projects:
  - a) the impact of the different development scales and timeframes in the FDS compared to the FULSS on the form of and need for each Project;
  - b) options for addressing the safety aspects of the proposed cycle paths and the necessity of requiring land to enable the implementation of those paths;
- 13.11 For NoR 1 Great South Road FTN:
  - a) the impact of the Project on access to the Z service station at 166 Great South Road, Takanini and options for addressing those impacts; and
  - b) options for reducing the extent of the designation and the impact on the following properties including substituting retaining walls or other structures for embankments, and/ or substituting a shared path for separate walking and cycling paths at:
    - i) 16 Great South Road; and
    - ii) Z service station, 166 Great South Road, Takanini; and
  - c) Clarifying the differences in the extent of bus lanes between the UDE drawings and the ATE analysis.
- 13.12 For NoR 2: Great South Road (Drury):
  - a) options for reducing the extent and impact of the designation including substituting retaining walls or other structures for embankments, and/ or substituting a shared path for separate walking and cycling paths at 263-275 Great South Road, Drury.
  - b) Information regarding the funding status, expected timing, and consenting status of the planned upgrade of the Norrie Road bridge.
- 13.13 For NoR 3: Takanini FTN:

- a) the effects that would arise from closure of the Weymouth Road bridge over the NIMT railway and how they could be managed;
- b) confirmation of the form and road layout at the NIMT railway overbridge on Weymouth Road;
- c) the impact of the Project on access to the following side roads and properties and methods for addressing these impacts:
  - i) Brough Road;
  - ii) Southmall;
  - iii) 8 Weymouth Road;
  - iv) KFC Great South Road and Weymouth Road;
  - v) Z service station, 228 Great South Road; and
  - vi) 59-59C Alfriston Road;
- d) the impact of the Project on on-street parking and options for addressing the effects at the following locations:
  - i) Great South Road near McAnnalley Street;
  - ii) near 52A Alfriston Road; and
  - iii) near 203 Great South Road;
- e) the impact of the Project on off-street parking and vehicle movement and options for addressing the effects at:
  - i) Southmall;
  - ii) KFC;
  - iii) the Z service station at 228 Great South Road;
- f) Why the full extent of the properties at the corner of Alfriston Road and Magic Way are required;
- g) options for reducing the extent of the designation and the impact on the following properties including substituting retaining walls or other structures for embankments, and/ or substituting a shared path for separate walking and cycling paths at:
  - i) 16 Alfriston Road;
  - ii) 116 Alfriston Road;
  - iii) Z service station, 228 Great South Road; and
  - iv) Manurewa Fire Station; and

13.14 For NoR 4: Porchester Road and Popes Road Upgrade:

- a) additional information around the assessment of alternative methods of providing active mode crossings near the Porchester Road / Popes Road intersection and the effects of those methods on safety and efficiency including information on controlling the

intersection with traffic signals instead, and a review of the alternative land requirement footprints for a traffic signals option;

- b) additional information about the need for changing the Popes Road / Takanini School Road intersection to a roundabout given the unremarkable safety record, the good efficiency of the Give Way layout, and the safety issues around access to 94 Takanini School Road;
- c) Options for reducing the extent of the designation and the impact on the following properties including substituting retaining walls or other structures for embankments, and/ or substituting a shared path for separate walking and cycling paths at:
  - i) Alfriston Road at and west of Porchester Road;
  - ii) Porchester Road, particularly near Nancy Wake Street;
  - iii) Popes Road; and
  - iv) 94 Takanini School Road;
- d) the impact of the Project on the gradient of the driveway at 200 Alfriston Road;
- e) the ability to provide property access across the “surface flow conveyance” devices proposed along Porchester Road and Popes Road;
- f) the probable form of the median in Popes Road and any subsequent impact on access to and from properties fronting Popes Road; and
- g) confirmation that both access driveways at 160 Manuroa Road are intended to be retained; and
- h) an assessment of the effects on Papakura Normal School from removal of on-street parking and measures proposed to address adverse effects.

### **Planning Framework**

- 13.15 In my view the projects, with the amendments to conditions I have recommended, are consistent with, support, and give effect to the relevant National Policy Statements, and the Auckland Unitary Plan including the Regional Policy Statement. The projects are consistent with, support, and give effect to other relevant documents including the Auckland Plan, Climate Plan, and Future Development Strategy.
- 13.16 In my view there are no additional management methods that could ensure greater consistency with the higher order planning documents beyond those I have recommended.

### **Adequacy of Assessment of Transport Effects**

- 13.17 The Assessment of Transport Effects (ATE) has evaluated the adverse and beneficial effects of the Projects based on all Projects being implemented in full. This approach has some limitations, but I consider these are largely unavoidable:
  - a) It does not consider a possible outcome where some projects, or some stages of some projects are not implemented;
  - b) It does not allow for the effects of each individual project to be evaluated separately.

- 13.18 The ATE assessment has also evaluated the effects by assuming that all planned growth would occur with or without the Projects. This approach does not align well with development in the growth areas being conditional on some of the Projects being implemented as required by the FDS. As a result, the beneficial transport effects of the Projects may be overstated, but on the other hand if growth does not occur some adverse impacts would not occur.
- 13.19 The ATE assessment also assumes that no other significant projects, such as works to improve safety on existing routes would occur in the absence of these projects, and that may also result in the safety benefits of the Projects being overstated.
- 13.20 I consider it would have been onerous for the ATE to have assessed the effects of each stage of each Project individually, and unduly onerous for the assessment to have considered every logical combination of various project stages.
- 13.21 It would have also been desirable for the ATE assessment to have excluded development in growth areas that are dependent on a Project being implemented; however those dependencies have only recently been established in the new FDS which post-dates the ATE.
- 13.22 In my view the effects of potential bridge closures on the operation of the transport network have been underestimated, or in the case of Weymouth Road omitted. I consider closure of any of the four bridges should be avoided, except during periods of low traffic flow.
- 13.23 Some properties that would have parking and/ or access removed or modified by the NoR 3 Project have not been identified or assessed (e.g. Southmall and KFC), and the removal of angle parking outside Papakura Normal Primary School as part of NoR 4 has not been identified or assessed.
- 13.24 The need for changing the Popes Road / Takanini School Road intersection to a roundabout is not clear, and as this change requires additional land and generates new safety concerns I consider the assessment of this change to be inadequate.
- 13.25 I consider the assessment of transport effects to be adequate except for those matters.

### **Adequacy of Assessment of Alternatives**

- 13.26 The AOA has outlined the extensive process that has been undertaken to consider, prioritise, and select the proposed overall type of Project, and the general design parameters of each Project.
- 13.27 The assessment of alternatives undertaken to date has considered the Projects at a sub-regional level and has considered some more localised issues such as the presence of particular environmental features. It is possible that further investigation and design work may uncover currently unknown issues, and that may require some further consideration of alternative means and methods of undertaking the work.
- 13.28 The assessment of alternatives has not considered alternative means and methods at a localised per-property level. Considering alternative methods such as choosing between an embankment or a retaining wall is likely to occur during the detailed design stage and in consultation with affected property owners through the ULDMP; however, in some cases that decision has a significant impact on effects and I recommend that additional consideration be given to alternate methods of undertaking the work for some submitter properties as described above.
- 13.29 I consider the assessment of alternative methods of undertaking the work is inadequate for NoR 4 with respect to the intersection of Porchester Road/ Popes Road and the intersection of Popes Road/ Takanini School Road.

- 13.30 Overall I consider the assessment of alternatives is adequate for the stated purpose and objectives at the macro scale, but that further consideration is warranted for two intersections and some individual properties.

### **Necessity**

- 13.31 When evaluated against the FULSS development expectations, I consider the addition of bus lanes and additional lanes at intersections as proposed to be reasonably necessary to provide for forecast growth. Given the changes made in the FDS the need for some of the Projects is no longer clear and I have recommended AT provide more information on this matter.
- 13.32 The majority of land required for the Projects is to facilitate the provision of cycle paths on each roadside. While I consider the provision of cycle facilities to be desirable, I have significant concerns about the safety of the proposed paths at existing driveways for three of the Projects, and on that basis I have reservations about this aspect of the NoR 1, NoR 3, and NoR 4 Projects being reasonably necessary.
- 13.33 As noted above I consider the proposed changes to Popes Road / Takanini School Road in NoR 4 are not necessary.
- 13.34 As noted above, the assessment of alternatives means and methods has not yet been undertaken at the micro per-property level or considered detailed design choices such as the use of an embankment or a retaining wall at each individual cut or fill site. As a result, I cannot confirm that the proposed extents of the designation on each individual property are reasonably necessary with respect to some properties in the absence of additional information.

### **Recommendations**

- 13.35 The following recommendations are preliminary prior to the receipt of evidence including any items of additional information listed above.

#### **NoR 1: Great South Road Frequent Transit Network**

- 13.36 I require more information about cycle path safety, and in the absence of that information I provisionally support this Project apart from the cycle path components (and associated land requirements), subject to amended CTMP requirements and an additional condition avoiding closure of Slippery Creek bridge except during periods of low traffic flow.

#### **NoR 2: Great South Road Upgrade (Drury Section)**

- 13.37 I support this Project subject to amended CTMP requirements and an additional condition avoiding closure of Hingaia Stream bridge except during periods of low traffic flow.

#### **NoR 3: Takanini Frequent Transit Network**

- 13.38 I require more information about cycle path safety, replacement of the Weymouth Road bridge, changes to access to several properties including Southmall, KFC, and Z Service Station, and loss of parking for multiple properties not identified in the ATE as outlined earlier.
- 13.39 In the absence of that information I provisionally support this Project apart from the cycle path components, subject to possible design changes elsewhere to mitigate the effects of changes to access arrangements, amended CTMP requirements and additional conditions relating to the closure of Alfriston Road bridge over the Southern Motorway and Weymouth Bridge over the NIMT railway so that closure of either bridge is avoided except during periods of low traffic flow.

#### **NoR 4: Porchester Road and Popes Road Upgrades**

- 13.40 I require more information about cycle path safety, alternative methods of controlling the Porchester Road / Popes Road and Popes Road / Takanini School Road intersections and alternative methods of providing for active modes to cross roads near the Porchester Road / Popes Road intersection.
- 13.41 In the absence of that information I provisionally support this Project apart from the cycle path components, the active mode crossings near the Porchester Road / Popes Road intersection, and the changes to the Popes Road/ Takanini School Road intersection, subject to amended CTMP requirements.

## Appendix A: Glossary of Terms and Abbreviations

Term	Description
AC	Auckland Council
Active Mode	Non-motorised means of transport including walking, cycling, scooting, skateboarding
AEE	Assessment of Environmental Effects prepared by SGA
AFC	Auckland Forecasting Centre, an AC, AT and NZTA partnership that operates transport models
AOA	Assessment of Alternatives prepared by SGA
AT	Auckland Transport
ATE	Assessment of Transport Effects prepared by SGA
AUP	Auckland Unitary Plan (Operative in Part)
Berm	The grassed or landscaped areas between the road carriageway and the road boundary excluding paths
CTMP	Construction Traffic Management Plan – a document that manages traffic during construction, will include a number of TTMPs
DBC	Detailed Business Case
DOSP	Drury-Opāheke Structure Plan
DSI	Death and Serious Injury road crashes
ERP	Emissions Reduction Plan
FDS	Auckland Future Development Strategy (2023)
FTN	Frequent Transit Network – public transport services running frequently, usually buses in bus lanes
FULSS	Auckland Future Land Supply Strategy (2017) superseded by FDS
FUZ	Future Urban Land – a zoning applied to land expected to be rezoned for future development
GA	General Arrangement – the concept design drawings the future works will be in general accordance with
GPS-LT	Government Policy Statement – Land Transport
IBC	Indicative Business Case
ITA	Integrated Transport Assessment
MDRS	Medium Density Residential Standards – a government initiative to increase housing provision
MSM	Macro Strategic Model – a transport demand software model of the Auckland Region
MoE	Ministry of Education
NIMT	North Island Main Trunk railway
NoR	Notice of Requirement
NoR 1	Project 1: Great South Road Frequent Transit Network Upgrade
NoR 2	Project 2: Great South Road Upgrade (Drury Section)
NoR 3:	Project 3: Takanini Frequent Transit Network Upgrade
NoR 4	Project 4: Porchester Road and Popes Road Upgrade
NPS-UD	National Policy Statement – Urban Development, a policy that planning decisions must give effect to
NZTA	Waka Kotahi New Zealand Transport Agency
OP	Outline Plan – plans provided by the RA to the Councils prior to commencing work
PC	Plan Change – a process to change a Unitary or District Plan, usually to rezone land
PC78	An Auckland Council Plan Change to implement the MDRS and related requirements
PT	Public Transport
RA	Requiring Authority
RCA	Road Controlling Authority
RPS	Regional Policy Statement – a regional statement that planning decisions must give effect to
RTN	Rapid Transit Network – public transport services running frequently on a dedicated way, includes passenger rail services and North Shore Busway
SGA	Te Tupu Ngātahī Supporting Growth Alliance
SH1	State Highway 1, Southern Motorway and Waikato Expressway
SH22	State Highway 22, Paerata Road and Karaka Road
SSTMP	Site-Specific Traffic Management Plan
TERP	Auckland's Transport Emissions Reduction Plan – a document planning decisions must have regard to
TTMP	Temporary Traffic Management Plan – a plan and drawings for the temporary management of traffic (may include hours of work, road closures and detours, temporary speed limits, the location of signs and cones), to be approved by the RCA.
UDE	Urban Design Evaluation
VKT	Vehicle Kilometres Travelled – a measure of vehicle travel on roads



## Appendix B: Submission Assessments

### NoR 1: Great South Road Frequent Transit Network Upgrade

#### Process

##### Sufficiency and Clarity of Information

- B.1 One submitter [17.1] is concerned about the ambiguity around the median and if the access points to their site would be affected and requested that detail be provided. I support that submission point.
- B.2 A submitter [19.4] requests further information on the benefits including details of new bus services and forecast patronage. I expect the modelling that has informed the assessment was based on assumed bus services and patronage levels based on typical values. I expect the actual bus services and patronage levels may be different from those used in the models and I also expect both to change over time as development progresses. For those reasons I do not support this submission point.
- B.3 One submitter [31.3, 31.7] is concerned that the extent of the bus lanes is unclear and requests they be shown on the concept drawings. The Notices do not require any bus lanes to be installed. As noted earlier, AT as Road Controlling Authority has the ability to modify lane arrangements on any road at any time so I consider requiring AT to provide particular lane arrangements in specific locations could be problematic. In addition, the travel demands and patterns are expected to change over time, and rigidly fixing the lane arrangements may not provide for the best operation of the road network at any point in time. For those reasons I do not support these submission points, but I do note the need for the project is based in large part on these lanes being provided.

##### Need for the Project

- B.4 At least three submitters [27.1, 32.1, 32.3, 33.2, 33.1] are neutral or express support for at least some aspects of the Project because of the benefits it would provide.
- B.5 One submitter [5.1] is of the view the project is not needed, noting the Project is poorly designed. That submitter and [30.1] are of the view the costs or other negative effects outweigh the benefits. Another submitter [16.1] is of the view widening the road to provide cycle facilities is not warranted due to low demand. I consider these points along with possible alternative methods below.

##### Alternatives to the Project

- B.6 One submitter [7.1] is of the view the project should be put on hold as it would be easier to build a bus corridor as part of the Mill Road Project. To be effective bus stops and corridors should be close to the populations they serve, and while bus facilities along Mill Road may be beneficial they would not negate the need for this Project, so I do not support that submission point.

##### Alternative Methods, Designs or Extents

- B.7 Multiple submitters express views about the extent and/or location of the designation, and/ or the nature of the design and the consideration of alternative methods of undertaking the work.

*Whole Project or Non-Specific Location*

- B.8 One submitter [19.5] considers that due to the low cycleway patronage other options such as a shared path should be considered instead of a separate path. Use of a shared path instead of separate paths could reduce the land required for the Project. A shared path may produce more conflicts between pedestrians and cyclists, but it may also reduce the speed of cyclists and improve safety at driveways. I recommend AT provide more information on this point, but in the absence of that information my interim recommendation is to support this submission point.

*Section 1: Browns Road - Grand Vue Road*

- B.9 A submitter [5.1, 5.2, 5.3] considers cycle lanes could be achieved within the existing road reserve and would not be part of a continuous cycle route, and the design drawings show an earthworks batter at 16 Great South Road when a retaining wall could be used instead.
- B.10 I consider it probable that other cycle facilities would be added over time to provide an interconnected cycle network.
- B.11 At this point, the GA drawing layout has insufficient space to accommodate a cycle lane within the proposed carriageway. The eastern kerb is shown around 3.5m from the existing road boundary. That would be sufficient for a footpath. It would also be sufficient for a 2.5-3m wide shared path, albeit with substandard clearances to the property boundary and the kerb.
- B.12 As noted earlier the permanent additional land requirement in this area is to provide for a separate cycle path so I consider the land requirement is as necessary as the cycle path. If the panel consider the cycle path to be reasonably necessary it would follow this land requirement is also reasonably necessary. As noted earlier I have significant safety concerns about the proposed cycle paths and therefore have reservations about the effects of the proposed cycle path and therefore about the requirement being reasonably necessary. I have invited AT to provide more information on that point, but in the absence of that information my interim recommendation is to support this and related submission points [5.1, 5.2, 16.1, 30.1].
- B.13 I consider that the use of a retaining wall instead of an earthworks batter may reduce the land footprint required in some locations. I request AT provide more information on the alternative method of using a retaining wall instead of an earthworks batter at this location. In the absence of that information my interim recommendation is to support submission point [5.3].
- B.14 Another submitter [23.2, 23.3] is concerned about the impact of the Project on the properties on the southeastern corner of the Great South Road/ Grand Vue Road intersection (64 and 66 Great South Road and 1 Grande Vue Road). The submitter considers AT has not considered alternatives adequately. In this section all widening is on the eastern side of the road. The road carriageway is proposed to be a similar width to the existing carriageway. The additional width (around 4.8m cross-section and more than 12m including construction space) would allow separated cycle paths to be added on both sides of the road. As above, my interim recommendation is to support these submission points.

*Section 2: Mahia Road Intersection*

- B.15 One submitter [9.1] supports the proposed changes to this intersection and I support that submission point.

*Section 6: Clark Road to Butterworth Avenue*

- B.16 One submitter [19.2] suggests relocating the widening to the Chisolm Corner side of the road. Chisolm Corner is located on the eastern side of Great South Road north of Settlement Road and is shown on Council's Geomaps as 312 Great South Road. The submission by Auckland Council Parks and Community Facilities [26.1] lists that site as one of its properties and seeks all effects on it are avoided.

- B.17 Further widening on the eastern side of the road would make the acute left turn into Settlement Road tighter and require that turn to require more land to the north, further reducing the efficiency of the intersection. For that reason I do not support [19.2].

*Section 7: Park Estate Road*

- B.18 One submitter [2.1, 2.2] questions the need for traffic signals at the Great South Road/ Park Estate Road intersection, stating the pedestrian demand is low, and signals will make it more difficult to get onto the road. They consider the intersection should remain as is and any widening make use of a farm on the other side of the road. I consider as traffic volumes increase due to development traffic signals would be necessary at this intersection so do not support this submission point.

**Permanent Effects**

Property Access

- B.19 Several submitters raised issues relating to property access for people and/or vehicles, or issues related to movement within a site.

*166 Great South Road Takanini*

- B.20 A submitter [30.4] opposes the NoR because the project would require the redesign of both accesses to the Z service station and Burger King restaurant and drive-through at 166 Great South Road Takanini (on the corner of Taka Street). The submitter says the Project would result in the loss of right turn movements, may require the closure of an access, result in poor or inadequate manoeuvring space for refuelling tankers and other vehicles, a reduction in safety, and other effects.
- B.21 The apparent permanent project cross-section, based on the GA drawings, on this site is relatively minor. In this section the proposed carriageway is shown narrower than the existing carriageway and the roadside berm areas are made wider to enable the provision of a separate footpath and cycle path on each side along with a grass separator strip. It appears that a relatively modest compromise on any of the widths of these features, or providing a shared path instead of separated paths could result in a significant reduction in the incursion of the cross-section onto the submitter's site, and potentially also result in a significant reduction in the designated area. For that reason I request that AT provide information on those alternative methods at this location for the hearing.
- B.22 That site is also affected by the Takanini Level Crossing (TLC) project NoR 1 and the submitter requests [30.2] the cumulative impacts of both projects are considered. I have reviewed the submitter's submission on the TLC1 Project in order to consider the cumulative impact. My colleague will report on the TLC Project separately.
- B.23 I note the submitter anticipates that SGA/ AT will change the TLC1 designation to address some of the submitter's concerns, but any changes were not formalised at the time of writing. In my view the cumulative impact of both projects on the safe and efficient operation of this site would be significant irrespective of the anticipated changes to the TLC1 NoR.
- B.24 In the absence of additional information on alternative methods my interim recommendation is to support this submission point.
- 167-179 Great South Road, 1-7 Graham Road, 19 Waimana Road, Takanini (Bunnings Site)*
- B.25 As noted above (clarity of information) a submitter [17.1] is concerned about the loss of right turn movements at the Bunnings site and requests the median be flush to retain right turn movements.

- B.26 The site has two driveways on Great South Road. The GA drawings show the existing 3m wide flush median replaced by a 2m wide undefined median. If a median island is installed it would prevent right turn movements in and out of one or both driveways. I expect that queues at the Taka Street traffic signals would constrain right turn movements at the northern driveway during busier periods with or without the Project, but right turn movements would be available at the southern driveway except if a median island is constructed.
- B.27 The probable detour routes to overcome right turn restrictions would include Walter Stevens Drive, Waimana Road and Graham Road, with the first two passing through residential areas.
- B.28 Following consultation, AT could construct a median island across one or both driveways at any time with or without the Project; however I do not anticipate a median island being required with or without the Project. As a result I support this aspect of the submission point.

#### On-Street Parking

- B.29 Submission point [19.1] is concerned that the removal of on-street parking between Beach Road and Manse Road because it would make vehicle access to properties (including 357-361 Great South Road) impractical.
- B.30 There is currently no on-street parking available along this section of Great South Road or 150m north of Manse Road, so the Project would not impact the availability of on-street parking along this section of road. On-street parking is available in Manse Road and Clark Road. I do not support this submission point.

#### Off-Street Parking and On-Site Movement

- B.31 Submission points [11.1 and 13.1] are concerned about the loss of visitor parking at 1/326 Great South Road Papakura (just south of the Beach Road/ Settlement Road intersection).
- B.32 The Project is expected to cover a significant portion of this property, with the GA cross-section extending approximately 7.4m into the property and the designation boundary extending further to accommodate an earthworks batter. Together those features would prevent any parking between the house and the road.
- B.33 There is currently no on-street parking along the frontage of this property, and the Project would allow for the removal of all parking on Great South Road. The nearest alternative parking would be in Butterworth Avenue, approximately 150m (2-minute walk) away.
- B.34 Along the frontage to this property the existing carriageway is 16.7 to 16.9m wide and footpaths (2.2m and 2.7m wide) are provided on each side. The GA drawings show a slightly narrower road carriageway. The roadside berm on each side is shown as separate foot and cycle paths and a grassed separator strip.
- B.35 The existing footpaths are narrower than desirable minimum dimensions for a shared path so it appears that some expansion of the road reserve may be reasonably necessary if any form of cycle facility is to be provided; however, in my view a reduction from the desirable widths and/ or using a shared path through this section could substantially reduce the impact of the Project on this property. I have invited AT to provide information on the safety of cycle paths and the consideration of alternatives. In the absence of that information my interim recommendation is to support this submission point.

#### Safety

- B.36 Submission point [16.2] considers pulling out of a driveway would become more hazardous because they would need to block the cycle path while accessing the road. While drivers are supposed to remain clear of the cycle path, in some situations a driver may have insufficient visibility of oncoming traffic when clear of the path so may need to wait on the cycle path. In my view a vehicle waiting over the cycle path would have a minimal impact on safety as an oncoming cyclist should be able to stop before colliding with a stationary vehicle. As noted

earlier, I do have significant concerns around the significant risk of a cyclist not being able to stop before colliding with a vehicle that is pulling onto the cycle path. I have invited AT to provide additional information on that point. In the absence of that information my interim recommendation is to support this submission point.

B.37 The same submitter [16.3] is concerned that the project would result in *“the loss of a safe distance of the house from the road”* in relation to *“326a and b Great South Road Opāheke”*, which I take to be the 1/326 Great South Road property considered above. If that is the correct property, the house is currently 13m from the road, with a 2.2m wide footpath between the road and the boundary fence. The GA design shows the house being 11m from the road with almost 7m of paths and grass strip between the road and the boundary fence. I consider the additional roadside area provides greater space for a driver to recover control of an errant vehicle so I expect there would be less risk of a vehicle colliding with, or passing through, the boundary fence. I consider any reduction in safety to the house or occupants to be negligible. For those reasons I do not support this submission point.

B.38 Submission point [24.1] is also concerned about safety as a result of the reduced distance between the road and a house, at 3/464 Great South Road Papakura (opposite Park Estate Road). At present the road is 9.4m from the boundary and almost 16m from the house. The Project is expected to move the edge of the road 1.4m closer to the fence and the house. The designation footprint does not extend onto this property. I consider the risk of vehicles colliding with the boundary fence or the house as the result of this Project to be negligible so I do not support this submission point.

#### Efficiency

B.39 A submitter [15.3] considers there is already significant peak-period congestion and the Project would increase it. Population growth and development in southern Auckland is expected to result in increased demand for travel. While the Project does not make any significant change to the capacity of the road network to accommodate more vehicles on the roads, by enabling the introduction of bus lanes the Project could enable a significant increase in the capacity of the network to move people. I do not support this submission point.

#### **Construction Effects**

B.40 Several submitters raised concerns about the potential for construction of the Project to produce adverse effects with many requesting changes to the construction management provisions.

#### *66 Great South Road Manurewa and 1 Grand Vue Drive*

B.41 A submitter [23.1] is concerned that construction traffic vehicle movements will produce adverse effects on these properties and request removal of the NoR or amendments to conditions. The permanent effects and the extent of the designation on 66 Great South Road were considered earlier. The designation does not extend over 1 Grande Vue Drive and I consider the effects of construction traffic on that property would be no more significant than for a road maintenance project that could be undertaken within the existing road reserve. The impact of construction activity on 66 Great South Road could be more significant, but the impact of construction traffic movements in the road in particular would not be significant in my view. For those reasons I do not support that submission point.

#### *84-99 Great South Road Papakura (KFC)*

B.42 This site is located on the corner of Great South Road and Subway Road. A submitter [22.1, 22.8] is concerned that construction of the project would have adverse effects on the safe and efficient operation of the KFC restaurant including access, the operation of the drive-through, and movement of trucks servicing the site. The submitter seeks various relief options including conditions that ensure adverse effects are adequately addressed.

- B.43 The GA drawings show the cross-section extending onto the KFC site to enable the provision of separate cycle paths and some minor earthworks batters along the Great South Road frontage, plus some additional space to provide for construction. The designation boundary runs close to, but not across the drive-through lane, but depending on the location of any construction equipment or fencing there may be insufficient clearance to allow some vehicles to exit the drive-through lane. The designation boundary also crosses part of the parking and I would expect manoeuvring for some parking spaces to be adversely affected.
- B.44 The GA drawing shows the road carriageway no closer to the boundary of these properties so the incursion into these sites is the result of providing for separate paths and the grass separator strip. The GA drawings do not include a grass separator strip on the opposite side of the road. It would appear there are several alternative methods that could reduce or entirely avoid the impact on these sites including narrowing or eliminating the grass strip and/or reducing the width of the paths and/or using a shared path. In my view it would be possible to avoid much of the construction impact on the operation of the parking and drive-through areas.
- B.45 I invite AT to provide additional information on the impacts of the Project on this property and how they may be addressed, and my interim recommendation is to support these submission points.

*Construction Traffic Management Plan*

- B.46 The Ministry of Education [27.5] notes that construction activity may have an adverse effect on education facilities and requests that the CTMP condition makes specific reference to these facilities. I support that submission point.
- B.47 Two other submitters [22.5, 30.14] are critical of the CTMP condition as they the need to engage or consult with affected parties is either absent or unclear, and in the absence of such engagement the adverse effects of construction may not be appropriately managed.
- B.48 I would not support any affected party having the ability to effectively veto or prevent a reasonably practicable construction process within a designation.
- B.49 The conditions require the preparation of a Stakeholder Communication and Engagement Management Plan (SCEMP) be prepared in consultation with stakeholders and others. The objective is to identify how the public and stakeholders (including affected owners and occupiers of land) will be engaged with prior to and through the Construction Works. The SCEMP is required to identify property owners and other parties to be engaged with, along with methods and timing to engage with owners and occupiers of land whose access is directly affected.
- B.50 The SCEMP condition explicitly identifies engagement in relation to access. While the objective arguably includes other ways of affecting a property it does not explicitly include other factors such as parking or movement within a site. I support the addition of “and within” to the condition to address vehicle and pedestrian movement within a property. Even with that amendment neither the SCEMP condition nor the CTMP condition explicitly address parking, although it could be construed as being included in the objective. Effects on parking during construction may be more difficult to remedy but I consider a general duty to avoid such effects where practicable could be an appropriate explicit addition to the conditions.
- B.51 I expect the timely and reasonably convenient movement of people and vehicles to and from properties along the route would be provided for by the CTMP to the maximum extent possible in any event. I would also expect that any contractor undertaking the work would notify occupiers of any restrictions well in advance. An obligation to engage or consult may afford the opportunity to impose any restrictions at a time that would produce the least impact on those properties.

- B.52 For those reasons I support those submission points and recommend that the CTMP condition require engagement or consultation with affected parties prior to any access or movement restrictions being imposed, and for any such restrictions to be as short as possible.

### **Other**

- B.53 Several submissions relate to properties near the intersection of Great South Road/ Alfriston Road/ Weymouth Road which is affected by NoR 3 and not NoR 1. I address submission points [32.5, 32.6, 32.8, 33.3, 33.5, 33.6, 22.8 and 33.9] under NoR 3.

## **NoR 2: Great South Road Upgrade (Drury Section)**

### **Process**

#### Sufficiency and Clarity of Information

##### *Cycle Facilities*

- B.54 A submitter [7.1] is unclear if “the cycleway” will be provided on both sides of the road and seeks the GA drawing be identified to show paths on both sides.
- B.55 Even if the GA drawings were modified, the works are not required to be implemented in general accordance with the GA drawings. The works are required to be in accordance with the Schedule 1 Description and Concept Plan. The Description refers only to “cycling facilities” and the Concept Plan shows various lines but does not identify any cycle paths.
- B.56 A second submission point [7.2] requests Schedule 1 be amended to include walking and cycling facilities on both sides which would then require those facilities to be provided.
- B.57 As discussed earlier in relation to a request to require bus lanes to be shown and provided, AT as Road Controlling Authority would normally have the ability to determine what form various parts of the road corridor may take and that may change over time. In this particular case a significant part of justifying the reasonable need to take land is based on the benefits provided by active mode facilities, and arguably the only reason land is required along most of this Project is to enable the provision of separate cycle paths.
- B.58 I support the second submission point in part, but as I currently have significant concerns over the safety of the proposed cycle paths, pending further information my interim recommendation is to not support these submission points.

##### *Bus Facilities*

- B.59 Submission points [14.7 and 14.8] are the same as points made on NoR1 [31.3, 31.7] and I do not support these submission points for the reasons given earlier.

#### Alternative Methods, Designs or Extents

##### *250 Great South Road, Drury*

- B.60 Two submissions [1.1, 2.1] seek that the impact on 1/260 and 2/260 (both parts of the 250 Great South Road site), which are on the south side of the road, be reduced by using retaining walls instead of a batter slope.
- B.61 At this location, the GA drawings show negligible batter slopes except for a low-lying area with a watercourse which is vegetated and not developed. For that reason I do not support these submission points with respect to transport.

*257 Great South Road, Drury*

- B.62 One submitter [5.1] is of the view the Project would have a significant adverse impact on the site and the veterinary clinic operating there because of loss of access and parking. The property is on the north side of the road and the submitter seeks the Project be shifted south so the paths and other elements remain outside the property.
- B.63 The notified material shows none of the cross-section (paths and other elements) on the property except for a minor area of earthworks which is located in front of the veterinary clinic but would not result in a loss of parking or access. The designation is shown across the property, potentially only to provide for construction activity. For that reason I do not support this submission point.

*263-275 Great South Road, Drury*

- B.64 A submitter [3.2, 3.3, 3.4] is concerned with the impacts on this property which accommodates a number of trade services, particularly the loss of parking and manoeuvring space. The property is located on the north side of the road and the submitter requests the Project be moved south onto land which is currently vacant. I do not support these submission points.

**Permanent Effects**

Property Access

- B.65 Five submitters are concerned about a potential loss of access [1.2, 2.3, 3.1, 6.1,8.2]. In this section access to properties may be altered, constrained, or potentially removed as the result of introducing a median island and/ or batter slopes.
- B.66 The GA drawings show an unspecified form of median which varies in width from very wide at the eastern end to narrow prior to the bridge. I do not envisage any need to construct a median island except for occasional pedestrian refuge islands, so I do not expect access to be restricted by median islands. If a median island were to be installed it could result in U-turn movements further along the road with poor safety outcomes. I support these submission points with respect to all access movements being maintained, albeit that the location of the access may need to be adjusted to accommodate height differences or pedestrian refuge islands.

On-Street Parking

- B.67 A submitter [2.2] is concerned that the proposal does not replace roadside parking which is currently relied on by visitors to 1/260 Great South Road.
- B.68 In this location roadside parking occurs on the road shoulder and is not demarcated. All roadside parking in this area is proposed to be removed as part of the Project, none of which is proposed to be replaced. As noted earlier I consider the assessment of effects arising from parking removal is inadequate. In this case the nearest alternative parking is located in Norrie Road, Tui Street, or Firth Street, all of which are about 300m from the site and may not have sufficient parking supply to accommodate the demand.
- B.69 I consider the provision of roadside parking in this area would result in poorer safety outcome for cyclists if the parking were located close to the cycle path, so any replacement parking would need to be located elsewhere to enable the cycle path to be provided. I recommend AT provide additional assessment of the effects arising from removal of on-street parking and methods for addressing those effects. My interim recommendation is to support this point in part.



### Off-Street Parking and On-Site Movement

#### *263-275 Great South Road, Drury*

- B.70 A submitter [3.1] is concerned with the impacts on this property which accommodates a number of trade services, particularly the loss of parking and manoeuvring space.
- B.71 The GA drawings show none of the expected permanent cross-section on this property apart from a batter slope. The batter slope extends across the areas used to access the site and areas used for parking.
- B.72 The gradient of the batter is not indicated and it is possible the proposed slope may be too steep to provide complying or practicable vehicle access, at least not without taking up more of the site front yard area. It would appear that the use of a retaining wall instead of a batter slope might significantly reduce the loss of parking and manoeuvring area, although the access issues remain uncertain.
- B.73 Additional land is included within the designation, potentially only for construction, but if occupied by AT would remove a large part of the site used for parking, vehicle movement and deliveries. It is possible that using a retaining wall instead may reduce the area required for construction.
- B.74 I request AT provide more information on this for the hearing, and my interim recommendation is to support this point in part to reduce the extent of the designation on this site.

### **Construction Effects**

- B.75 The Ministry of Education [11.5] notes that construction activity may have an adverse effect on education facilities and requests that the CTMP condition makes specific reference to these facilities. I support that submission point.
- B.76 Two submitters [15.2 and 16.2] are concerned about the disruption to the businesses at 257 Great South Road Drury because of the area shown as likely to be used for construction reducing parking, access and vehicle movements on the site. They request land on the right [south] side of the road is used instead.
- B.77 I cannot provide an expert opinion on the areas of land required for construction, but I do not support these submission points in relation to transport.

### **NoR 3: Takanini Frequent Transit Network**

#### **Process**

##### Sufficiency and Clarity of Information

- B.78 Two submitters [16.6 (and NoR 1: 32.6), 17.6 (and NoR 1: 33.6)] are concerned that the material is ambiguous about whether the Weymouth Road bridge over the NIMT railway will be widened or provide a different road layout.
- B.79 The layout of the road at this location is material to the effects on the operation of this section of Weymouth Road and the properties that front it. The NoR 3 Form 18 Schedule 1 description does not describe the changes to this bridge and the Concept Drawing is illegible at the scale provided. I support these submission points and request that AT provide more information on this matter for the hearing. In the interim my recommendation is to support these submission points.

- B.80 A submitter [39.3] is concerned that the extent of the bus lanes is unclear and requests they be shown on the concept drawings. I do not support this submission point for the reasons given in NoR 1.

Need for the Project

- B.81 Four submitters [16.1, 17.1, 31.1, 39.1] support the need for the Project in whole or in part.
- B.82 One submitter [8.1] is of the view the existing road is sufficient. Two submitters [10.2, 11.2] in Alfriston Road request the NoR is withdrawn as there is already a cycle facility and bus stop on Alfriston Road, and another Alfriston Road submitter [19.1, 19.3] requests the NoR is withdrawn on the grounds Council is scrapping cycle way projects.
- B.83 The widening of the Alfriston Road reserve would provide for an additional traffic lane in each direction in addition to separate walking and cycling paths. AT expect that the additional traffic lanes would be used as bus lanes at peak times. I consider the Project and widening of the road corridor in some form to be reasonably necessary to provide for the growth forecast for the FULSS development scenario. Auckland Transport not Auckland Council is responsible for any cycle facilities on roads.
- B.84 The Project is expected to provide an increase in the capacity of Alfriston Road to cater for expected growth. Additional information is required to determine if additional lanes along Alfriston Road are still required for the FDS development scenario. In the absence of that information my initial recommendation is to not support these submission points opposing the Project.

Alternative Methods, Designs or Extents

*Section 3A: Weymouth Road (and intersection with Great South Road)*

- B.85 A submitter [15.4, 15.9] opposes the Project on the basis the Great South Road/ Weymouth Road/ Alfriston Road intersection is already controlled by traffic signals, the objectives could be achieved in a smaller footprint, and the assessment has not adequately considered the position of the McDonalds restaurant on the northwestern corner of that intersection.
- B.86 Another submitter [27.2, 27.5] is opposed to the Project due to the impacts on the KFC site on the southwestern corner of the intersection, particularly the extent of a batter slope over part of the drive-through, parking and vehicle manoeuvring areas.
- B.87 The design shown on the GA drawings would require removal of most or all of the McDonald's building. The whole of the KFC site lies within the proposed designation and the GA design cross-section would extend across substantial parts of the site used for vehicle parking and movement. It appears the existing access on Weymouth Road would no longer be practicable.
- B.88 The Project will impact both properties due to widening of the Great South Road and Weymouth Road carriageways to provide additional traffic lanes, to provide separated paths and a separation strip, batter slopes, and additional space presumably intended to provide for construction.
- B.89 The Project is expected to provide a significant improvement in the operational efficiency of the Great South Road intersection to cater for growth by implementation of the FULSS development scenario. Additional information is required to determine if additional lanes at the Great South Road intersection are still required to provide sufficient operational efficiency for the FDS development scenario. In the absence of that information my interim recommendation is to support these submission points.

### *Section 3C: Alfriston Road*

- B.90 A submitter [29.1] opposes the designation requiring the entire property at 7 Alfriston Road, a large property on the southern side of Alfriston Road near Great South Road. It appears the whole property is included to provide a wetland and a construction area. The GA design cross-section extends over 8m into the site plus an additional 6m for a batter slope. The additional width would enable additional traffic lanes on Alfriston Road, increasing the capacity of the road and the nearby Great South Road intersection. It appears that use of a retaining wall instead of a batter slope could reduce the design cross-section, but that may make access to the site more difficult.
- B.91 A submitter [7.1] opposes the project on the basis that there are already bus lanes on Alfriston Road and removing the median strip would “do the job.” At this location (141D Alfriston Road) the carriageway is proposed to be increased in width to provide an additional traffic lane in each direction. Removing the central median would require the removal of the right turn lane into Magic Way to the west of the site and would make turning right in and out of nearby properties more difficult.
- B.92 Additional information about the need for the additional lanes on Alfriston Road in light of the FDS is required, but my interim recommendation is to not support these submission points.
- B.93 A submitter [3.1] opposes the removal of an existing retaining wall on the road boundary of 16 Alfriston Road to provide a batter slope. The GA drawings show the design cross-section only extending into the site to provide and construct a batter slope. I expect the existing retaining wall, part of which appears to be leaning, may need to be replaced with either a batter slope or a new retaining wall, and either would require space for construction activity. I request AT provide information on the ability to use a retaining wall instead of a batter slope, but otherwise do not support this submission point as the existing wall appears to be insufficient.

### **Permanent Effects**

#### Property Access

#### *Section 3A: Weymouth Road (and intersection with Great South Road)*

- B.94 Three submitters [16.3, 16.5, 16.8, 17.3, 17.5, 17.8, 26.3, 26.4, 26.5, 26.6] raised concerns about access and connections to Southmall. The submitters oppose closure of the Weymouth Road access and seek better connectivity. One point [26.4] suggest the access, if retained, would no longer comply with minimum acceptable visibility and requests [26.6] that AT install traffic signals at the access.
- B.95 As noted earlier in this report I consider the Project would make removal of right turn movements or closure of the access highly likely and in my view the effects have not been adequately addressed. In my view the installation of traffic signals would not be appropriate due to the proximity to Great South Road so I do not support [26.6]. Pending further information my interim recommendation is to support the other submission points.
- B.96 Two submitters [27.4, 30.1] express concerns about the loss of access to the KFC restaurant at 2 Weymouth Road and requests access be retained. I have recommended interim support for other submission points relating to the need for the Project with respect to this property pending information about changes in development forecasts.
- B.97 If the Project is still needed the GA drawings show a batter slope extending across the Weymouth Road frontage of the site. Even if a retaining wall were used instead, it would appear that vehicle access on the Weymouth Road frontage would no longer be practicable. The effects of that change have not been assessed and I invite AT to provide more information on this point for the hearing. My interim view is that retention of vehicle access on this frontage would not be viable so do not support the request to retain this access and these

submission points; but I do support the need for an assessment or some form of mitigation to be provided.

- B.98 Another submitter [38.2, 38.3] is concerned about the impact on the Z service station on the southeastern corner of the intersection, including changes to site access arrangements, the ability for larger vehicles including the refuelling tanker to use the site, and the possible loss of right turn movements. The impact on the Great South Road frontage is moderate, as the GA design carriageway is further from the property and the additional land enables the provision of separated paths, and it is possible that a different design may not require as much or any land on that frontage. The impact on the Alfriston Road frontage is significant as all road widening in this area is proposed to be undertaken on the southern side of Alfriston Road and the road carriageway extends on to the property. It appears impractical to avoid all effects on this property while still widening Alfriston Road, but it may be possible to significantly reduce the impact if alternative path arrangements are used.
- B.99 As noted earlier in this report I have invited AT to provide more information on the impact on this property, and my interim recommendation is to support this submission point.

*Section 3B: Great South Road*

- B.100 A submitter [28.1] is concerned that the loss of the apron in front of the Manurewa Fire Station may impede the ability to respond to emergencies. The submitter requests any changes are undertaken in collaboration with the submitter and do not affect its operations.
- B.101 At this location, the road carriageway is generally in the same position as existing and the additional land would enable the provision of separate walking and cycling paths. It appears an alternate design may reduce or avoid the change to the fire station apron and I invite AT to provide more information about this or other alternative methods of undertaking the work. My interim recommendation is to support this submission point.

*Section 3C: Alfriston Road*

- B.102 A submitter [32.4] is concerned about the impact of the Project on right turn movements at 52A Alfriston Road, the design of the driveway in relation to pedestrian, cycle and bus movements, and increased traffic volumes.
- B.103 The access to this property is located where the GA drawings show a median transitioning to a right turn lane and it is unclear if the median will be flush or an island. If the right turn exit movement is removed drivers may need to detour along Scotts Road, McAnnalley Street and Great South Road which could involve significant additional travel time during peak periods, or alternatively a U-turn movement somewhere east of the property. If the right turn entry movement is removed a similar detour would be required, and I consider the adverse effect to be moderate for those people. As noted earlier I have concerns about the safety of the cycle path at driveways. I do not have safety concerns in relation to the pedestrian path or bus lanes with respect to driveways. I consider the traffic volumes are likely to be the similar with or without the Project. Pending information about cycle path safety my interim recommendation is to support this submission point in part.
- B.104 A submitter [25.1,25.2] is concerned about the boundary treatment that may be used along the frontage to 59-59C Alfriston Road, a site that provides housing for people with disabilities. The GA drawings show the road carriageway in a similar location to the existing carriageway with additional land required to enable the provision of separate walking and cycling paths. The GA cross-section shows a batter slope extending into the site, although the slope is shown as negligible at the existing driveway which is used for pedestrian access. I therefore expect there to be no significant change in the gradient of the driveway, although changes may be required to the pedestrian access to the front of the house closest to the road. I request AT provide more information on this point, and my interim recommendation is to not support this submission due to the negligible change in driveway gradient.

- B.105 A submitter [22.3] is concerned how they will get in and out of their property at 137 Alfriston Road with more traffic and bus lanes on the frontage. Drivers turning in or out of a property or side road are permitted to use up to 50m of the bus lane on entry or departure so I consider entering and exiting the property via a left turn would be similar with or without the Project. The ability to undertake right turns depends on the form of the median, but I consider effects resulting from the loss of right turns to be minor in this case, so I do not support this submission point.
- B.106 A submitter [19.2] is opposed to the Project due to concerns about how the works and changes in speed will affect access at 139 Alfriston Road. That property is a short distance west of Magic Way. At that location, the GA drawings show an additional traffic lane in each direction and a median that develops into a right turn lane across the property frontage. The impact of the Project on the ability to turn right in or out of the property, or the likely safety of such movements is unclear. If right turn movements are removed additional journey time would be required to circumvent the restrictions, but I consider those effects to be relatively minor. I do not expect the Project to result in material differences to the speed of vehicles. I do not support this submission point.

#### On-Street Parking

- B.107 A submitter [32.8] considers the removal of public parking spaces will adversely affect the community including the ability for tradespeople and visitors to access properties. If the NoR is confirmed the submitter requests replacement public parking in residential areas.
- B.108 Side roads where alternate parking spaces may be available can be up to 450m apart along Alfriston Road and in my view the impacts of removing parking spaces have not been assessed adequately, and I have invited AT to provide more information on this topic; however I do not expect the provision of replacement parking spaces to be practicable, so on that basis I do not support the relief requested in this submission point.
- B.109 A submitter [6.1] requests the existing on-street parking spaces near 203 Great South Road Manurewa be retained for customer parking and loading to cafes. This site is located within the Manurewa Town Centre. The GA drawings show five parking spaces are to be removed to provide a longer downstream merge for the northbound traffic lanes. The carriageway is to be widened a little and the NoR proposes to expand the road reserve to enable a berm (grass strip) to separate the footpath from the carriageway. I have reservations about the necessity to provide a berm within a town centre; however, I consider the removal of the parking spaces is reasonably necessary to provide for the additional lanes and the increase in intersection capacity that will benefit buses and other road users. For that reason I do not support this submission point.

#### Off-Street Parking and On-Site Movement

##### *Section 3A: Weymouth Road*

- B.110 Two submitters [17.9, 26.1, 26.2] are concerned about the loss of parking on the Southmall / New World site and one requests replacement parking is provided. I agree with the submitters that the loss of these parking spaces has not been adequately assessed and support the request for the loss of parking to be assessed together with the other effects such as the loss of the access point on Weymouth Road, and for those effects to be appropriately addressed. That may or may not involve replacement parking so I support those submission points in part.
- B.111 A submitter [27.8] opposes the impact on the operation of the KFC restaurant site and I agree with the submitter these effects have not been adequately assessed or addressed, so support this submission point in part.

### *Section 3C: Alfriston Road*

- B.112 A submitter [23.2] is concerned the removal of parking for ten work vehicles from 67 Alfriston Road would have a significant impact. This property is zoned Residential – Mixed Housing Suburban Zone where there is no maximum number of parking spaces. The Project would take a significant proportion of the front yard of this property; however sufficient space to park several vehicles would remain on the site. I do not support this submission point.
- B.113 A submitter [1.2] is concerned about the loss of residential parking at 116 Alfriston Road. This property has a garage and a paved front yard used for parking with a retaining wall on or near the boundary. The GA drawings suggest the Project could result in the cross-section extending around 2m into the property plus around the same distance for a batter slope plus space for construction. It appears the garage would be largely unaffected, and the use of a retaining wall instead of a batter slope may allow a parking space to be retained in the front yard. I invite AT to provide additional information on how alternative methods, such as using a retaining wall might reduce the impact on this submitter and provide interim support of this aspect of this submission point.
- B.114 A submitter [9.1] is concerned the Project will cause a parking problem at 135 Alfriston Road. This property has a double carport and space to park two cars in the paved front yard. The GA drawings show the cross-section reducing the front yard so that no parking is possible, other than in the carport and removing any prospect of on-site manoeuvres so all vehicles would need to reverse into the road.
- B.115 Another submitter [22.1] has similar concerns about the neighbouring property at 137 Alfriston Road. This property has a single carport and a paved front yard where two vehicles could be parked. As with the above property much of the front yard falls within the Project cross-section with additional land extending under the carport being required for a batter slope and construction space. The submitter is concerned about the loss of all parking. I expect the carport would remain useable once the construction is completed, but that all other parking would be lost.
- B.116 I consider there could be a decrease in safety for vehicles exiting both of these sites due to the loss of on-site manoeuvring space. I do not consider it would be practical to avoid the effect while enabling the widening of the road, but as noted earlier additional information on the need for the Project is requested. My interim recommendation is to not support these submission points.

#### Efficiency

- B.117 Two submitters [10.4, 13.4] at 88 Magic Way and 141a Alfriston Road, along with other signatories, are concerned about several aspects of the Project including that it “*will affect the traffic flow in and out of the area*” and “*full road closure*”.
- B.118 As demonstrated in the supporting documentation the Project is expected to result in improved efficiency of movement along the road corridors. As noted earlier, I consider the impact of the closure of Beaumonts Way to be minor. As a result I do not support these submission points if they relate to permanent effects. I consider effects during construction below.

#### Safety

- B.119 Two submitters [18.2, 22.2] are concerned that additional traffic flow and higher speeds will produce poorer safety outcomes, particularly for children. I expect that traffic volumes and speeds would not change significantly as a result of the Project so do not support these submission points.
- B.120 Two submitters [1.2, 9.1] are concerned about adverse safety effects from the road moving closer to their houses in Alfriston Road. In this section the road is proposed to move about

3m closer to the houses. I consider the increase in risk to the houses or occupants to be negligible and do not support those aspects of those submission points.

### **Construction Effects**

#### Road Closures

- B.121 As noted above, two submitters [10.4, 13.4] are concerned about traffic flow in and out of the area and full road closures and request the Project is stopped. Another submitter [18.4] has similar concerns. I have significant concerns about the operation of the road network if roads are closed for bridge replacement and have recommended that closure be avoided except during periods of low flow, such as overnight. I support those submission points in part.

#### Property Access and Management of Effects

- B.122 As for the other NoRs, the Ministry of Education [36.3, 36.5] requests amendments to the CTMP provisions to address effects on education facilities and I support those submission points.

#### *Section 3A: Weymouth Road*

- B.123 One submitter [26.7, 26.8] is concerned about the effects of construction activity on the New World Southmall site and requests conditions be imposed to minimise effects on access as far as practicable and that a site-specific construction traffic management plan be required. As this site attracts significant volumes of traffic I support these submission points.

#### *Section 3C: Alfriston Road*

- B.124 A submitter [25.3] is concerned about access to 59-59C Alfriston Road during construction and requests the CTMP condition specify that access to the property, including for emergency services is *“always retained”*. I expect it may not be possible to provide access to all properties at all times during construction of the project but accept that disruption should be avoided and minimised as far as practicable. I note that similar disruptions could result from maintenance of the existing road corridor.
- B.125 Another submitter [32.5] also has concerns about property access during construction and seeks a schedule of traffic management phases and alternative measures. As noted above some access disruption is likely and is possible without the Project, and I expect any disruption to be minimised as far as possible.
- B.126 I note that the Stakeholder Communication and Engagement Management Plan (SCEMP) requires engagement with stakeholders including the owners and occupiers of properties where access is potentially affected. The Construction Traffic Management Plan (CTMP) addresses construction effects and is required to include *“methods to maintain access to property and/or private roads where practicable, or to provide alternative access arrangements when it will not be.”* I consider those provisions are appropriate so I do not support these submission points.

### **Other**

- B.127 KiwiRail [31.3, 31.4] supports the Project but seeks amendments to conditions to ensure the design of the road elements is compatible with the design and operation of the rail corridor, including the use of construction methodologies that minimise closure of the NIMT railway. I support those submission points in principle noting that KiwiRail is the RA for a NIMT railway designation.

## NoR 4: Porchester Road and Popes Road Upgrades

### Process

#### Sufficiency and Clarity of Information

- B.128 Two submitters [16.11, 17.11] are concerned that the design provided for this NoR and the Takanini Level Crossings (TLC) NoR 2 are different. The two NoRs overlap along Walters Road with this NoR showing the intersection controlled by traffic signals and the TLC NoR drawings showing a roundabout.
- B.129 As stated elsewhere the GA drawings are based on concept designs and the detailed design used for implementation may be different. In addition it is possible that AT may stage the Project so that one road layout is built and then superseded by the other at a later time. For that reason I do not consider the inconsistency is grounds for refusing the NoRs and do not support these submission points.
- B.130 Submitter [16.3] also queries the reliability of the analysis when the forecast traffic volumes are significantly different between the two Projects, noting the volumes forecast in the NoR 4 material are significantly higher than in the TLC material. The submitter provides directional traffic volumes on Walters Road between Arion Road and Porchester Road for both projects for both peak periods.
- B.131 I have sourced forecast NoR 4 traffic volumes from the ATE Appendix A which provides intersection model output summaries for the Walters Road / Porchester Road intersection with and without the Project. I have sourced forecast NoR 2 volumes from the TLC ATE Appendix B for the Walters Road/ Arion Road intersection which provides similar information for the with project scenario only.
- B.132 I have not been able to calculate the westbound traffic volumes on Walters Road from the NoR 4 information as the volumes are provided on a per-lane basis, and some lanes at the Porchester Road intersection contain more than one movement – for example, the Walters Road east approach kerbside lane contains both left turn and straight-ahead movements. Because of that I cannot confirm the NoR 4 eastbound [labelled southbound in the submission] volumes provided in the submission, but the westbound volumes [labelled northbound in the submission] do match the volumes provided in the ATE for the With Project scenario, and the NoR 2 volumes in the submission match the NoR 2 data from the ATE.
- B.133 The following table summarises the volumes.

*Table 39: Comparison of traffic volumes on Walters Road between Porchester Road and Arion Road*

Scenario	Peak Period	TLC NoR 2		South FTN NoR 4	
		Eastbound	Westbound	Eastbound	Westbound
Without Project	a.m.				366
	p.m.				835
With Project	a.m.	396	811	463	
	p.m.	576	511	855	

- B.134 The TLC ATE Appendix A provides a table of modelling assumptions. It shows that the South FTN Takanini FTN Project (NoR 4) was included in all TLC model scenarios. I would therefore expect the NoR 4 With-Project scenario should be a good match for the TLC NoR 2 without-project scenario; however, no without-project scenario volumes are provided for NoR 2, so I cannot confirm my expectation.
- B.135 The TLC ATE includes *Figure 37 2048+ daily traffic flow difference plot (with the Project – without the Project)*. That figure shows a blue bar on Walters Road west of Porchester Road which indicates a decrease in daily traffic volume. From that, I would expect the NoR with-project peak-period volumes would likely be less than the NoR 4 volumes, which is the case.



- B.136 On that basis I do not agree there is a fundamental error in the assessment. In my view the differences are most likely explained by the TLC projects being forecast to alter the pattern of traffic flow in the area. As a result I do not support that submission point.
- B.137 As with NoR 1, a submitter [24.3, 24.8] is concerned that the extent of the bus lanes is unclear and requests they be shown on the concept drawings. For the reasons given earlier I do not support this submission point.

#### Need for the Project

- B.138 Two submitters [15.2, 17.1] query if the Project is still needed following removal of land from future development scenarios in the FDS. As noted earlier I request AT provide more information on this point and my interim recommendation is to support these submission points.
- B.139 Two submitters [10.5, 19.1] are of the view that cycle facilities or bus lanes on Alfriston Road are not required as either the traffic volume on Alfriston Road allows those vehicles to use the same lanes as other vehicles or the existing cycle lane is underutilised and the need should be reassessed. As noted above I request that additional information be provided on the need for these elements of the Project given the development expectations of the FDS, and my interim recommendation is to support these submission points.

#### Alternative Methods, Designs or Extents

- B.140 One submitter [5.3] considers the intersection of Porchester Road and Popes Road should be controlled by traffic signals. Another [15.4] notes the dual-lane roundabout appears to be inconsistent with the single-lane cross-section and single-lane roundabouts elsewhere along the route and [15.7] considers there has been no adequate assessment on the number of lanes or the layout of this intersection. They also comment on the safety of the proposed pedestrian facilities which I have already addressed above.
- B.141 In my view a dual-lane roundabout in an otherwise single-lane environment is not usual. The need for dual lanes is primarily a function of the traffic volumes at the intersection and a side road with higher traffic volumes would make a dual lane roundabout more likely, so I do not support submission point [15.4].
- B.142 As I noted above, there are questions around the need for this upgrade given the FDS. I also have significant safety concerns with the proposed design and concluded the most appropriate way to give priority to pedestrians and cyclists here is to control the intersection with traffic signals instead of a roundabout. I requested AT provide additional information on this, and my interim recommendation is to support these other submission points.
- B.143 One of those submitters [15.4, 15.9] considers the 2016 upgrade to the western side along part of Porchester Road is fit for future purposes, the need for the designation has not been demonstrated with respect to their property, and requests that section of the NoR be withdrawn. That work provided a wider carriageway, a 3m shared path and other changes for a distance of around 200m north of Popes Road.
- B.144 The proposed roundabout is offset to the western side of Porchester Road and the associated realignment results in the need to take some of the submitter's land. That would remain the case even if the same road cross-section as constructed in 2016 was used. As I noted earlier controlling this intersection with traffic signals would likely substantially reduce the area of land required on the western side of Porchester Road and pending further information on alternative methods here my interim recommendation is to support these submission points in part.
- B.145 A submitter [7.4] note recent upgrades on Porchester Road near Nancy Wake Street have provided a shared path and consider a shared path would require less of their land than the proposed separated path design. As noted earlier I have requested AT provide more

information on the use of shared paths and other alternate methods and my interim recommendation is to support this submission point.

- B.146 Another submitter [6.2] considers the need to purchase part of 94 Takanini School Road (opposite Popes Road) could be avoided by altering the earthworks design and reducing the area required for construction, avoiding the need to relocate staff parking, and other things, during construction. The GA drawings show the constructed cross-section including a batter slope within the existing road reserve apart from a negligible change at the vehicle crossing. The front portion of the property is requested, presumably to provide for construction activity. I would expect that relocating staff parking could be difficult during construction as on-street parking could be temporarily removed. I understand the need for requiring the submitters land for construction will be considered by others, but with respect to parking my interim recommendation is to support this submission point pending further information on the need for the land.

### **Permanent Effects**

#### Property Access

##### *Section 4A: Alfriston Road*

- B.147 A submitter [10.2] is concerned that the project will exacerbate existing issues with the gradient of the driveway at 200 Alfriston Road. The GA drawings show the ground in the first part of the driveway being lowered, and that would make that part of the driveway steeper. I do not have sufficient information about the existing gradients or proposed level change to assess the impact on useability; however it would appear that the driveway would not comply with the Unitary Plan requirements. Looking from the road it appears that the driveway gradient further into the site is more moderate, but achieving a suitable grade may require changes such as removal of trees or construction of retaining walls. I invite AT to provide more information on what is proposed and how any issues could be addressed and pending that information my interim recommendation is to support this submission point.

##### *Section 4B: Porchester Road North and Section 4D: Popes Road*

- B.148 A submitter [14.4] is concerned about the loss of access to 296 Porchester Road. The site is large and currently has two driveways on Porchester Road and one on Popes Road. The submitter is concerned the proposal would remove all access. They request the NoR is withdrawn or modified.
- B.149 The NoR documentation is silent on changes to access to this property. The GA drawings show a proposed active mode crossing of Popes Road at the site access location that is likely to require that access to be relocated, and a "*Proposed Surface Flow Conveyance*" (i.e. a swale or open drain) along that site frontage. I have no information to suggest that no access would be provided on Popes Road. Likewise there is nothing in the documentation to suggest that either of the Porchester Road accesses would be closed, although I expect they may need to be reconstructed.
- B.150 Another submitter [15.11] is concerned that the proposed swale may preclude future access points to 354 Porchester Road from Popes Road, and notes uncertainty about the availability of right turn movements.
- B.151 A submitter [21.1] is concerned about access to 311 Porchester Road and requests more information. A surface flow conveyance is proposed across the frontage of this property.
- B.152 I expect access across the conveyance devices would be possible (away from the roundabout), albeit that a culvert may need to be installed to cross the drain. In addition it is my understanding that AT is legally obliged to provide some form of access to these properties.

- B.153 I invite AT to provide further information about the ability to provide access across the “surface flow conveyance” devices, but in the interim my recommendation is to not support these aspects of these submission points.
- B.154 I note the uncertainty around the median conditions and the availability of right turn movements at these locations along Popes Road. I invite AT to provide additional information about the form of median and the ability to undertake right turn movements, and my interim recommendation is to support that part of [15.11].

*Section 4B: Porchester Road North*

- B.155 Another submitter [7.3] is concerned that the loss of one of two access driveways at 160 Manuroa Road would be unsafe and requests more information. This property is on the northwestern corner of the Porchester Road / Manuroa Road intersection with two driveways on Porchester Road. The GA drawings show the existing single-lane roundabout replaced with a larger one along with the provision of separated paths and an active mode crossing point located between the two driveways. A significant portion of the submitters land is shown as required to accommodate these features. The GA drawings and other documentation are silent on these driveways and I have no information to support the submitter’s concern that one driveway could be removed. I acknowledge that the retention of both driveways would allow vehicles to exit the site in a forwards direction and that would have significant safety benefits. I request AT provide information about access to this property and in the interim my recommendation is to support this submission point.

*Section 4C: Porchester Road / Walters Road Intersection*

- B.156 The Ministry of Education [22.9] is concerned that the designation places restrictions over all pedestrian and vehicle access points to Papakura Normal School and requests amendments to the extents of the designation.
- B.157 The school currently has vehicular access and separate pedestrian access on Walters Road at or near the existing zebra crossing at the eastern end of the Project, and two gated pedestrian access points on Walters Road about 120m and 50m from Porchester Road, a pedestrian access on Porchester Road at the existing zebra crossing and a vehicle access towards the southern end of the school’s frontage to Porchester Road. I see no indication in the material that any of these access points would be removed and no medians are shown that could potentially remove the ability for vehicles to turn right. As there is no suggestion that any of the school accesses would be closed or restricted I do not support this aspect of this submission point.

Parking

*Section 4C: Porchester Road / Walters Road Intersection*

- B.158 The Ministry of Education [22.9] is concerned that the Project removes on-street parking outside Papakura Normal School and requests amendments to the extents of the designation. As discussed earlier I consider the removal of this parking is likely to displace the parking demand to the existing parking area within Bruce Pulman Park and recommended that AT upgrade the pedestrian crossing between that parking area and the school. I do note that the parking area may not be available for school use when large sporting events occur, or if use of the parking area was restricted by Bruce Pulman Park Trust. I support this aspect of this submission point in part only as it may be possible to mitigate or remedy the adverse effects without altering the designation.

Efficiency

- B.159 A submitter [10.6] considers the bridge over the motorway on Alfriston Road is a bottleneck and seeks it is addressed to ensure traffic flow efficiency. The NoR 3 Project proposes replacing the existing two-lane bridge with a four-lane bridge and my interim recommendation

is to support that submission point pending further information about the need for the Projects given the FDS development scenario.

- B.160 A submitter [18.4], located in Sheriff Place, is concerned about crossing Porchester Road as a result of increased traffic volumes. I consider the traffic volumes on Porchester Road could increase in a similar way with or without the Project so do not support this submission point.

#### Safety

##### *Section 4A: Alfriston Road*

- B.161 A submitter [10.4] considers the existing bus stop near the intersection of Alfriston Road and Porchester Road is a hazard and requests it be relocated to one of three given locations. The bus stop is located immediately to the east of the submitter's driveway. I consider this to be an operational matter for AT independent of this NoR so do not support this submission point.

##### *Section 4B: Porchester Road North*

- B.162 A submitter [5.4, 5.5] considers the Project would place their dwelling an unsafe distance from the roundabout and seeks some form of barrier at the corner of their dwelling. This property is located on the northeastern corner of the intersection. As noted earlier the GA design shows the roundabout offset to the west, away from this dwelling and the roundabout would not be significantly closer to the dwelling than the existing intersection. As a key function of a roundabout is to reduce the speed of vehicles passing through the intersection I expect any vehicles that leave the road here would be travelling slower than at present. In addition, the GA drawings show a "flow conveyance device" i.e. swale or open drain between the roundabout at the dwelling, further reducing the likelihood of a vehicle colliding with the house. As noted earlier I have requested that AT provide information about the alternative method of controlling this intersection with traffic signals. If that occurred a vehicle may be more likely to leave the road at a slightly higher speed, but I do not consider that would result in a reduction in safety compared with the existing situation. As a result I do not support these submission points.

- B.163 Another submitter [15.6] is concerned that the proposed active mode crossings at the Porchester Road / Popes Road intersection are not safe and contrary to best practice. The submitter requests the NoR be withdrawn or relocated. As noted earlier I agree with the submitter's views on safety of the active mode crossings but consider those concerns could be addressed by modifying the design. As a result I support that submission point in part.

##### *Section 4D: Popes Road*

- B.164 A submitter [20.1] is critical of the impact of the Project on the health and safety impacts in the context of industrial traffic movements and seeks the NoR be declined, with more information to be provided to the hearing. In the absence of that information I consider the Project to have mixed effects on safety as outlined above, but that safety issues could be resolved without needing to decline the NoR. For that reason, my interim recommendation is to not support this submission point.

#### **Construction Effects**

##### Property Access

- B.165 Multiple submitters [15.27, 16.5, 16.6, 17.5, 17.6, 17.20] are concerned about property access during construction with many requesting that access be maintained throughout the construction period. For the reasons given elsewhere I do not support these submission points.

Management of Effects

- B.166 As with the other Projects the Ministry of Education [22.3, 22.11, 22.5] requests amendments to the CTMP condition which I support in part.

**Other**

- B.167 A submitter [2.1] is concerned that the Project would result in more trucks using Stratford Road and requests that tipper trucks be prohibited from exiting the Southern Motorway at Hill Road. I understand such a prohibition would not be lawful or enforceable and do not support that request.



# Technical Specialist Memo - Acoustics

**To:** Cheryl Cleary, Reporting Planner

**From:** Peter Runcie (Acoustics)

**Date:** 26 February 2024

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**Subject: Supporting Growth Alliance - South Frequent Transit Network (South FTN)  
NoRs 1-4  
Acoustics Assessment**

## 1 Introduction

1.1 I have undertaken a review, on behalf of Auckland Council, of the South Frequent Transit Network Notice of Requirement, which is comprised of four (4) Notices of Requirements (NoRs) lodged by the Requiring Authority, Auckland Transport, through the Supporting Growth Alliance (SGA), in relation to acoustics (noise and vibration) effects.

1.2 In writing this memo, I have reviewed the following documents:

- a) Assessment of Construction Noise and Vibration Effects ('CNVE report'), Version 1.0 dated 13 October 2023.
- b) Assessment of Operational Noise and Vibration Effects ('ONVE report'), Version 1.0 dated 13 October 2023.
- c) Proposed Conditions of consent for all 4 NoRs.
- d) 92 Request for Further Information 30 October 2023, Requiring Authority's response to s.92 Request for Information (RFI).
- e) Submissions.
- f) Form 18s for each NoR including proposed Conditions and Schedules.
- g) General Arrangement Drawings for 4 NOR.
- h) Manurewa Local Board comments.

### *Qualifications and Experience*

1.3 I am a Technical Director at SLR Consulting in Auckland, specialising in environmental and architectural acoustics. I hold the qualification of a Bachelor of Science Degree with Honours in Audio Technology from the University of Salford in the United Kingdom. I am a full member of both the Institute of Acoustics (UK) and the Acoustical Society of New Zealand, a member of the New Zealand Planning Institute and SLR's New Zealand representative for the Association of Australasian Acoustical Consultants.

1.4 I have over sixteen years' experience in the field of acoustic consultancy. In my career I have worked on a range of projects within the United Kingdom, Europe, Middle East, Australia, and New Zealand. My work has involved a wide range of acoustic assessments, including working on numerous assessments of environmental noise effects from projects across New Zealand. I have presented evidence at numerous council level hearings, and in the New Zealand Environment Court.

### *Involvement with South FTN NOR's*

- 1.5 I was engaged by Auckland Council in May 2023 to review the 4 South FTN NoRs to determine whether the information provided was sufficiently detailed and accurate to understand the noise and vibration effects of the proposal. The purpose of my review is to consider the noise and vibration matters common to all four NoRs.
- 1.6 I visited the sites on 14 September 2023.

### *Structure*

- 1.7 This document sets out the following:
- a) Identification of key noise and vibration issues (Section 2);
  - b) Construction noise and vibration effects (Section 3);
  - c) Traffic noise and vibration effects (Section 4);
  - d) Noise and vibration matters raised in submissions and by the Local Boards (Section 5);
  - e) Conclusions and recommendations (Section 6); and
  - f) Recommended conditions (Section 7).

### *Expert Witness Code of Conduct*

- 1.8 I confirm that the statements made within this memorandum are within my area of expertise and I am not aware of any material facts which might alter or detract from the opinions I express. Whilst acknowledging this process is not before the Environment Court, I have read and agree to comply with the Code of Conduct for Expert Witnesses as set out in the Environment Court Consolidated Practice Note 2023. The opinions expressed in this memorandum are based on my qualifications and experience, and are within my area of expertise. If I rely on the evidence or opinions of another, my statements will acknowledge that.

### *Perceived Conflict of Interest*

- 1.9 I note that SLR Consulting recently acquired 4Sight Consulting and that members of the 4Sight (now SLR) planning team have been engaged by BP Oil Limited and Z Energy Limited to prepare submissions on their behalf. I can confirm that I have had no previous contact with people involved in the preparation of submissions in this regard and that I have been engaged to act on behalf of Auckland Council for the purpose of reviewing the notices of requirement as described below. I declare that I have no conflict of interest with the submitters.

## **2 Key Noise and Vibration Issues**

- 2.1 The following potential effects have been identified and considered across all four NoRs:
- Construction noise and vibration; and
  - Traffic noise and vibration.
- 2.2 In my opinion the relevant potential effects have been identified by the Requiring Authority.
- 2.3 The Requiring Authority's key assessment conclusions and my technical review of these findings are outlined below.



### 3 Construction Noise and Vibration

#### *Criteria*

- 3.1 A consistent approach has been adopted across all four NoRs regarding construction noise and vibration.
- 3.2 Applicable construction noise criteria for the projects are based on the requirements of the Auckland Unitary Plan Operative in Part (AUP) –Standards E25.6.27, E25.6.28 and E25.6.29 and NZS 6803: 1999 *Acoustics – Construction Noise*. I consider the identified noise limits to be appropriate for the proposed construction activities.
- 3.3 The main objective of controlling construction vibration is identified as to avoid vibration-related damage to structures. I agree with this objective with regards to daytime works, however, for night-time works where people are sleeping I would consider amenity impacts to also be a key concern.
- 3.4 Construction vibration criteria are based on a combination of the requirements of the AUP – Standard E25.6.30 – and the Waka Kotahi *State highway construction and maintenance noise and vibration guide* approach regarding using two categories of vibration (although this guideline is not referenced explicitly). If the Category A criteria cannot be practicably achieved, the focus shifts to avoiding building damage rather than avoiding annoyance by applying the Category B criteria. Building damage is unlikely to occur if the Category B criteria are complied with. I agree with the general approach regarding vibration criteria adopted, including use of a longer night-time period than that required under the Auckland Unitary Plan (**AUP**) to provide better outcomes for receivers. However, I note that the proposed Category B night-time criteria (2 mm/s PPV) is twice as permissive as that within the Waka Kotahi guidelines<sup>1</sup>. This could result in greater effects at night being permitted prior to further mitigation measures being required to be implemented, therefore I recommend that it is reduced to no greater than 1 mm/s PPV in line with the Waka Kotahi guidelines. This would require amendment to the Construction Vibration Standards condition, which I have discussed below.

#### *Assessment*

- 3.5 The future environment and specific details of type and location of receivers at the time of construction are not known, with an identified timeframe of 10-15+ years until construction may commence. The assessment therefore seeks to identify potential effects at existing receivers and a process to manage effects at the time the works take place. Potential effects associated with noise and vibration levels are identified in Table 6-1 and Table 6-2 of the CNVE report, I consider these to be reasonable. As a general comment, the assessment identifies that:
  - a) Receivers within 76 m of unmitigated works could experience levels greater than the daytime noise criterion (70 dB LAeq).
  - b) Receivers within approximately 20m of works may be subject to vibration levels greater than the AUP daytime vibration amenity criterion (2 mm/s PPV).

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<sup>1</sup> [State highway construction and maintenance noise and vibration guide - August 2019, version 1.1 \(nzta.govt.nz\)](https://www.nzta.govt.nz/state-highway-construction-and-maintenance-noise-and-vibration-guide-august-2019-version-1.1/)

- 3.6 The assessment of construction effects is based on works taking place up to the construction boundary, as illustrated in the General Arrangement Drawings. This is not a fixed boundary as the NoR proposes that the designation does not differentiate between construction areas and operational areas. Given the level of design information available I consider with this approach to be reasonable. I note that there could be a difference in construction noise and vibration levels if the detailed design results in the construction works boundary moving closer to dwellings. However, this scenario is similar to one whereby future dwellings are constructed closer to the designation than currently exist, and so have not been assessed. The proposed conditions provide for this scenario and set out the performance criteria and the process which must be followed.
- 3.7 A list of existing properties where exceedance of the 70 dB LAeq daytime noise criterion is predicted is provided in Appendix A of the CNVE; however, the magnitude and duration of potential infringements have not been provided. Without this information it is only possible to provide high-level commentary around the potential effects for each NoR.
- 3.8 The proposed process to manage construction noise and vibration effects is set out in Section 11 of the CNVE, including creation of a CNVMP and Schedules to manage and mitigate noise and vibration when exceedance of the limits is identified. The process is required under the Construction Noise and Vibration Management Plan (CNVMP) and Schedule to a CNVMP conditions. I consider this approach to be reasonable.
- 3.9 I have provided comments on the key conclusions related to construction noise and vibration associated with individual NoRs in **Table 1** below. As identified effects in different NoRs are similar (due to the nearest existing receivers being similar distances from the works) I have combined the comments for brevity.

**Table 1 Construction Noise and Vibration**

Notice of Requirement	Review and Comment
NoR1 – Great South Road FTN Upgrade	The closest existing dwellings to all the NoRs are located within 2-4m of the construction boundary.
NoR 2 – Great South Road Upgrade (Drury section)	If works take place on the construction boundary, with mitigation in place, construction noise levels up to 85-90 dB LAeq are predicted to occur intermittently at the closest receivers. At this level, indoor effects would broadly fit in the following Table 6-1 description “ <i>Untenable for both office and residential environments. Unlikely to be tolerated for any extent of time.</i> ”
NoR3 – Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades	This would potentially result in needing the works to take place while the properties are unoccupied via arrangement with the occupants. The description of potential noise effects in 7.1.1, 8.1.1, 9.1.1 and 10.1.1 of the assessment somewhat underplays these potential effects.
NoR 4 – Takaanini FTN – Porchester Road and Popes Road Upgrade	Without vibration specific mitigation, the possibility of cosmetic damage to buildings (such as plaster/paint cracking) is identified as a possibility at the closest receivers. Avoidance of this effect would likely require adoption of specific lower vibration generating methodologies, such as use of non-vibratory or static

Notice of Requirement	Review and Comment
	<p>compaction equipment.</p> <p>For works in these NoRs, exceedance of the noise and vibration criteria is likely during daytime and night-time works (if night-time works required) and so consultation and identification of specific mitigation measures are likely to be essential following the process required under the 'Schedule to a CNVMP' condition. The same process would apply to future receivers should these exist closer to the works at the time of construction.</p>

#### 4 Traffic Noise and Vibration

##### *Criteria*

- 4.1 Rule E25.6.33 of the AUP requires that new roads and altered roads which are within the scope of NZS 6806:2010 *Acoustics – Road-traffic noise – New and altered roads* (NZS 6806) comply with the requirements of that standard. The assessment has applied the requirements of NZS 6806. I consider this to be the appropriate standard.
- 4.2 In brief NZS 6806 sets out the process for managing noise effects from new and altered roads. It follows a process of identifying noise sensitive receptors along the route, predicting noise levels at those receptors, comparing the predicted noise levels against noise criteria in the standard (Categories A, B and C). The category criteria apply as follows:
- a) Where consistent with the best practicable option for the mitigation of road traffic noise, the criteria of Category A (the most stringent criteria) shall apply;
  - b) Where is it inconsistent with the adoption of the best practicable option to achieve the criteria of Category A, the criteria of Category B shall apply;
  - c) Where is it inconsistent with the adoption of the best practicable option to achieve the criteria of Category A or Category B and where the internal noise levels of any habitable space would be greater than 45 dB LAeq, the criteria of Category C shall apply;
  - d) Where it is it inconsistent with the adoption of the best practicable option to achieve the criteria of Category A, B or C, the internal noise levels of any habitable space shall be mitigated to the extent that it is practicable.
- 4.3 Criteria for assessment of traffic vibration is not provided in the assessment. I consider this a potential weakness to the assessment and provide comment on this below.

##### *Assessment*

- 4.4 The assessment methodology is set out in Section 4 the ONVE report. I consider that the modelling approach, inputs and software are appropriate for this stage of the NoR.
- 4.5 Section 4.4.1 of the ONVE report identifies that the modelling of existing road noise is within 2 dB decibels of measured levels at measurement positions MP1 and MP2<sup>2</sup>, where traffic on existing roads is the controlling noise source. Further, the assessment

<sup>2</sup> Measurement position locations MP1 – MP3 are shown in Section 5.2.4 of the ONVE.

notes that Section 5.3.4.2 of NZS 6806 states the difference between measured and predicted levels should not exceed  $\pm 2$ dB. Given that measurements at MP1 and MP2 were only 1-hour long, and the predicted levels are 24-hour noise levels the results of these comparisons can be treated as a broad indication only.

- 4.6 Predicted levels at MP3 were within 7 dB of the measured levels at MP3, this is identified as likely to be due to wind generated noise from vegetation (leaves rustling etc) and cars travelling at greater than the speed limit. Whilst it would take significant wind generated noise and speed variations to generate a 7 dB difference; it is feasible. For this reason, I do not consider the presentation of this data to be beneficial to the overall assessment and report.
- 4.7 Notwithstanding the limited measurement data and discrepancy in the modelled and measured levels of the one long term location, I consider that the modelling approach, inputs and software are appropriate for this stage of the application.
- 4.8 The predicted noise levels are provided in tables as well as noise contour graphics as appendices.
- 4.9 General subjective perceptions to changes in noise level are provided in Table 3-2. I generally agree with those descriptions. Most relevant for the NoRs is that a change of 1-2 dB could be considered being subjectively insignificant, changes of 3-4 dB being just perceptible, and changes of 9-11 dB representing a halving or doubling in loudness.
- 4.10 I have summarised the key findings of the ONVE related to traffic noise and vibration associated with individual NoRs in **Table 2** below.

**Table 2 Traffic Noise and Vibration**

Notice of Requirement	Review and Comment
NoR1 – Great South Road FTN Upgrade	<p>The predicted road noise levels at existing PPFs are identified as mostly within Category A under the Do Minimum scenario (Category A is the most stringent relevant external noise criteria set under NZS 6806). 21 PPFs fall within Category B and 3 PPFs within Category C.</p> <p>Because the predicted noise levels do not increase sufficiently between the Do Nothing and Do Minimum scenarios, the road does not meet the definition of an Altered Road under NZS 6806. Therefore, specific noise mitigation options do not need to be considered under the Standard for these PPFs.</p> <p>No significant increases in traffic noise levels have been predicted in this NoR. Noise levels are predicted to increase by a just noticeable margin (increases no greater than 3-4 dB) or else reduce by as much as 4 dB at existing PPFs.</p> <p>I consider these results to be reasonable, based on the inputs and methodology.</p>

Notice of Requirement	Review and Comment
NoR 2 – Great South Road Upgrade (Drury section)	<p>The predicted road noise levels at existing PPFs<sup>3</sup> are identified as within Category A under the Do-minimum scenario. Category A is the most stringent external noise criteria set under NZS 6806.</p> <p>No significant increases in traffic noise levels have been predicted. Noise levels are predicted to increase by a negligible margin (increases no greater than 2 dB) or else reduce by as much as 4 dB at existing PPFs.</p> <p>I consider these results and recommended mitigation to be reasonable based on the inputs and methodology.</p>
NoR3 – Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades	<p>The predicted road noise levels at existing PPFs are identified as mostly within Category A under the Do Minimum scenario (Category A is the most stringent external noise criteria set under NZS 6806). 39 PPFs fall within Category B and 2 PPFs within Category C. For PPFs predicted to receive noise levels in Category C NZS 6806 requires consideration of building modification to achieve suitable internal noise levels.</p> <p>The ONVE notes that ‘a low noise road surface’ is already implemented in the Do Minimum design where the Category B and C PPFs are located and so noise barriers were considered. Barriers were, however, found to not be practical due to maintaining property access. Barriers are recommended to be re-assessed at the time of detailed design to confirm whether the noise levels at Category B and C receivers could be reduced. It is unclear whether a higher performing road surface was considered as mitigation, and so I recommend that the road surface is also re-assessed at the time of detailed design. Use of a higher performing low noise road surface (such as a porous asphalt type subject to being suitable from a safety and engineering perspective) may be sufficient to significantly reduce the number of PPFs in Category B, and potentially C.</p> <p>Noise levels are predicted to increase by a clearly noticeable margin (increases up to 8 dB) or else reduce by as much as 8 dB at existing PPFs.</p> <p>I consider these results to be reasonable, based on the inputs and methodology.</p>
NoR 4 – Takaanini FTN – Porchester Road and Popes Road Upgrade	<p>The predicted road noise levels at existing PPFs are identified as mostly within Category A under the Do-minimum scenario (Category A is the most stringent external noise criteria set under NZS 6806). 38 PPFs fall within Category B and 8 PPFs within Category C following a combination of road surface change and barriers – referred to as the Mitigation 2 scenario. For PPFs predicted to receive noise levels in Category C NZS 6806 requires consideration of building modification to achieve suitable internal noise levels.</p>

<sup>3</sup> Protected premises and facilities (PPFs) include existing houses, schools, marae and similar as defined in NZS 6806.

Notice Requirement	of Review and Comment
	<p>The ONVE notes that 'a low noise road surface' is already implemented in the Do Minimum design where the Category B and C PPFs are located and so noise barriers were considered. Barriers were, however, found to not be practical due to maintaining property access. Barriers are recommended to be re-assessed at the time of detailed design to confirm whether the noise levels at Category B and C receivers could be reduced. It is unclear whether a higher performing road surface was considered as mitigation, and so I recommend that the road surface is also re-assessed at the time of detailed design. Use of a higher performing low noise road surface (such as a porous asphalt type) may be sufficient to significantly reduce the number of PPFs in Category B, and potentially C.</p> <p>Noise levels are predicted to increase by a just noticeable margin (increases up to 4 dB) or else reduce by as much as 11 dB at existing PPFs.</p> <p>I consider these results to be reasonable, based on the inputs and methodology.</p>

- 4.11 The above predicted results and effects are based on use of a specific low-noise road surface (in this case AC14, an asphaltic concrete). The resultant noise effects as described in the ONVE report are, in most cases, dependent on road surfaces being implemented which achieve the same or better acoustic performances. This is broadly captured under the proposed Low Noise Road Surface condition which requires asphaltic concrete surfacing (or equivalent low noise road surface) throughout each of the NoRs.
- 4.12 No assessment of vibration effects is provided. The position related to vibration in the ONVE is based on new or upgraded roads being designed to be smooth and even and avoiding vibration generated from passing traffic over uneven surfaces. I consider this to be a reasonable assumption but note that avoiding potential adverse amenity effects as a result of smooth roads is reliant on the road design being required to result in smooth and even surfaces and to be maintained as such for the duration of the road's life. As demonstrated by the comments a number of submissions, for example Mr Singh of 116 Alfriston Road, this is not necessarily something which can be assumed to occur by default, as is relied upon in the ONVE. For this to be the case in a way which can be relied upon I recommend that at the very least it is captured in a condition of consent, such as the Low Noise Road Surface condition as per my comments below. Should a more robust requirement be preferred, this could be achieved through setting performance requirements for vibration (such as is done for noise) based on the Standard adopted by Waka Kotahi (NS 8176.E : 2ED 2006 Vibration and Shock – Measurement of Vibration in Buildings from Land based Transport and Guidance to Evaluation of its Effects on Human Beings).

### *Future PPFs*

- 4.13 Future increased density of residential development, including multi-storey dwellings or apartments, near to the NoR alignments is noted as expected. As the extent and detail of future development is not yet known (i.e., with building consents issued) assessment at potential PPFs is not required to be considered under the guidance in NZS 6806. Therefore, mitigation has only been identified in the ONVE based on PPFs existing at the time of the assessment.
- 4.14 The ONVE report sets out an expectation that the design of new dwellings should take into account the existing and predicted noise environment. However, how this information would be provided and developers made aware is not clearly set out in the assessment. Consideration of traffic noise as part of new developments containing PPFs is not a requirement in the AUP, as it is in some District Plans, or the Building Consent process and so there is a chance that awareness and consideration of this potential effect could fall through the gaps as the area is developed.
- 4.15 It is my opinion that future dwellings (constructed prior to the designation detailed design) warrant consideration in terms of noise effects. However, I understand the Requiring Authority position that once the designation is in place making information available regarding the level of noise would assist developers in proactively factoring this into the design of their developments. To provide a balance of shared responsibility it is my opinion, based on the current framework of guidance, that consideration of barriers and the long-term use of low noise pavements (i.e., mitigation to control the road noise at source) should consider the environment at the time the BPO assessment takes place, potentially 10+ years in the future.
- 4.16 On this basis it is my recommendation that the conditions include a requirement for the future BPO assessment to determine the BPO for the environment that is present prior to construction starting to ensure the most appropriate source noise mitigation measures (road surfaces, barriers etc.) are identified and able to be incorporated into the design. I consider it pragmatic that the Requiring Authority is not responsible for acoustically treating dwellings that are constructed following the lodgement of the NoR so long as future road noise level information is made clearly and easily available to developers such that they are able to consider those effects in their designs (the intent of this is captured in Condition 3 (d) (i) E).
- 4.17 An alternative option to Condition 3 (d) (i) E could be for the noise contours to be included as a layer on the Auckland Council GeoMaps GIS website such that it appears on property files directing people to the project website where they can find the detailed noise contour information. However, I acknowledge that how this may be achieved is beyond my expertise as an acoustic expert.

## 5 Submissions

5.1 Of the submissions received, a number raised noise and/or vibration as a concern. These can be broken down into the topics of construction effects and permanent effects. The number of submissions per topic are set out in **Table 3** below.

**Table 3 Number of Submissions**

Topic	Notice of Requirement	Number of submissions
Construction Effects	NoR 1	3
	NoR 2	1
	NoR 3	7
	NoR 4	7
Permanent (operational) effects	NoR 1	5
	NoR 2	1
	NoR 3	6
	NoR 4	4

5.2 The details of the submissions are discussed in **Table 4** below.

**Table 4 Submissions and Comments**

Notice of Requirement	Submitter	Submission and Comments
NoR 1	Singh (473 Great South Road)	<p>Concern was raised regarding potential for increased noise from introduction of traffic lights close to property. Comment is also made related to reduction of vegetation resulting in increased noise.</p> <p><i>Comment: Studies and evidence suggest that whilst there may be slight changes to the character of the noise, due to the change in acceleration patterns, the introduction of signalised intersections (traffic lights) would be unlikely to change the overall noise levels compared to free-flowing road conditions by a perceptible amount (in the order of 1 dB).</i></p> <p><i>Whilst vegetation can provide a psychological barrier from road traffic noise, dense vegetation at least 10 m deep and 2-3m high is typically required to make a perceptible measurable difference to traffic noise; it is not clear that this level of vegetation exists at the property in question.</i></p>
NoR 1	Du Plessis (3 Argyle Avenue)	<p>Concern was raised regarding noise, particularly potential sleep disturbance.</p> <p><i>Comment: Predicted noise levels at 1/3 and 2/3 Argyle Avenue (it is unclear which specific dwelling relates to the submitter) are noted to be 20 dB lower than the most stringent (Category A) noise performance criteria – predicted levels at these properties do not increase with the designation. At this</i></p>



		<p>level achieving reasonable internal noise levels for sleep is expected to be achievable with windows partially open to provide ventilation and so the risk potential for sleep disturbance is low.</p>
NoR 1	<p>Howe (326a and b Great South Road)</p> <p>Govender (357, 359 and 361 Great South Road)</p>	<p>Concern was raised regarding noise due to the road being closer to the house.</p> <p><i>Comment: Whilst the distance to the road may change, noise levels at these properties are predicted to change by an imperceptible 1 dB due to the proposed road surface and other changes occurring as part of the proposed designation.</i></p>
NoR 1	<p>Restaurant Brands Limited (84 and 86-88 Great South Road)</p> <p>Patel (64 and 66 Great South Road)</p>	<p>Concern was raised regarding construction noise and vibration effects.</p> <p><i>Comment: The proposal sets out the limits and how construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects, I consider this to be a reasonable approach.</i></p>
NoR 1-4	<p>Kāinga Ora Homes and Communities</p>	<p>Kāinga Ora seek through their submission:</p> <ol style="list-style-type: none"> <li>1. To require mitigation be provided to all properties exposed to levels of 55 dB <math>L_{Aeq(24h)}</math> or greater with reference to evidence prepared by Ms Drewery (also a specialist for this designation application working on behalf of Auckland Transport).</li> <li>2. That Operational Conditions are amended to address BPO for PPF identification and assessment that recognises the receiving environment as it exists at the time;</li> <li>3. That low noise road surfaces are required on all roads within the designations; and</li> <li>4. Building modification to be required for all properties likely to receive internal road traffic noise levels greater than 40 dB <math>L_{Aeq(24h)}</math>.</li> </ol> <p><i>Comment:</i></p> <ol style="list-style-type: none"> <li>1. <i>I cannot comment on the prior evidence of Ms Drewery. However, I acknowledge that there are various international guidance documents (as noted in the submission) which indicate external levels of 50-55 dB <math>L_{Aeq(24h)}</math> to be preferable for road noise at residential receptors for the avoidance of moderate annoyance within populations and the avoidance of potential adverse health effects. In practice it can be difficult to achieve these levels due to the limitations in source mitigation such as the inability to control traffic volumes or the requirement for significant noise barriers which would either block access to property or offer an undesirable urban design outcome.</i></li> </ol>

		<p>Where control of road noise control at source is not feasible, the quantity of buildings that might require acoustic treatment could become considerable. Further complicating matters is the fact that the majority of these PPFs would have been constructed after the road, raising the question of who should be responsible for the mitigation effort. Notwithstanding, the assessment provided in the ONVE report is in accordance with NZS 6806, which sets out specific road traffic noise performance criteria. This is the standard required for the assessment of road traffic under the Auckland Unitary Plan (standard E25.6.33) therefore meeting the expectations for road traffic noise in Auckland.</p> <ol style="list-style-type: none"> <li>2. I have noted the lack of consideration of the effects of noise on future PPFs and provided my comments on this topic in paragraphs 4.13 to 4.17 of my review. I have recommended condition wording changes on this topic in <b>Section 7</b> below.</li> <li>3. I note that proposed Condition 29 requires low noise road surfaces and applies for all designations.</li> <li>4. Kāinga Ora identify that there may be circumstances where existing dwellings experience increased exposure to noise (though the specific level of increase required to trigger this is not defined). They consider that mitigation is necessary in these instances to achieve an internal noise level of 40 dB <math>L_{Aeq(24h)}</math>, effectively mitigation from road noise levels greater than 55 dB <math>L_{Aeq(24h)}</math> (paragraphs 26 and 27 of the submission). This represents a significant departure from the required standard (NZS 6806) which only requires at property mitigation from altered road noise levels greater than 67 dB <math>L_{Aeq(24h)}</math>. However, I note that it is not uncommon for such a requirement to be adopted (and proposed by Auckland Transport or Waka Kotahi) for the avoidance of reverse sensitivity in the instance of new residential subdivisions adjacent to existing noisy roads or state highways. For further context, Appendix A of the ONVE identifies that most PPFs predicted to be exposed to levels greater than 55 dB <math>L_{Aeq(24h)}</math> under the Do Minimum scenario already experience similar levels of noise and so clarity from Kāinga Ora would be required as to what level change they would consider sufficient to warrant consideration of such mitigation.</li> </ol> <p>In summary, the approach taken in the ONVE is consistent with that taken across NZ in accordance with the required Standard and, in Auckland, the AUP. Some of the changes proposed by the submitter would resulting in significant departure from the Standard in terms of external limits and triggers for mitigation related to internal noise levels. It would therefore be likely to have significant implications on road traffic noise assessments across NZ. Such changes would require robust discussions with the various stakeholders (Waka Kotahi, Auckland</p>
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		<i>Transport, Auckland Council among others); given the nature of the submission this may be a topic which requires expert conferencing.</i>
NoR 1-4	Ministry of Education	<p>Concern was raised regarding potential construction noise and vibration effects at education facilities. The request sought a CNVMP with specific wording related to engagement with education facilities should exceedances be identified as likely.</p> <p><i>Comment: The process requested is already provided for in the proposed conditions in a way that would include education facilities, I do not consider a change to the condition wording in this respect to be necessary.</i></p>
NoR 3	Singh (116 Alfriston Road)	<p>Concern was raised regarding noise and vibration effects, noting existing vibration effects from the road.</p> <p><i>Comment: Road noise is predicted to increase by up to 3 dB at this location (a just noticeable increase) but remain within Category B.</i></p> <p><i>I have commented on vibration earlier in my review and have recommended condition wording change aiming to provide greater certainty of design and maintenance of roads to minimise and avoid adverse vibration effects.</i></p>
NoR 3	<p>Khamis (88 Magic Way)</p> <p>Restaurant Brands Limited (2 Weymouth Road)</p> <p>Self (52A Alfriston Road)</p>	<p>Concern was raised regarding construction noise and vibration effects.</p> <p><i>Comment: The proposal sets out the limits and how construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects, I consider this to be a reasonable approach.</i></p>
NoR 3	Umara (106 Alfriston Road)	<p>Concern was raised regarding increased noise due to added lanes.</p> <p><i>Comment: Noise levels at this property are predicted to change by an imperceptible amount (2 dB) when compared to the future Do Nothing scenario. On the basis of the imperceptible change in noise levels I consider the proposed mitigation (low-noise road surface) to be appropriate to mitigate these effects.</i></p>
NoR 3	Accessible Properties Limited (59-59C Alfriston Road)	<p>Concern was raised regarding potential construction noise and vibration effects, specifically regarding provision of prior warning to enable potential relocation of tenants. Relief is sought through reduction of construction noise limits to 45 dB L<sub>Aeq</sub> between 6pm and 8 am. Comment was also raised regarding operational noise at the dwelling at 59C Alfriston Road.</p> <p><i>Comment: The proposal sets out the limits and how</i></p>

		<p>construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects. Proposed Conditions 22 and 23 set out the framework for communication and engagement with nearby residents and stakeholders, as requested by the submitter. This includes preparation of schedules when levels exceed the standards. Reducing the noise limit is likely to increase the duration of works through limiting the available hours to undertake the works, which could result in greater adverse effects than completing the works quicker. Further, based on the noise contours, existing road traffic noise levels at 59C and 59B are in the region of 55 – 65 dB LAeq(24h), therefore it is likely the occupants are already exposed to elevated noise levels due to proximity to Alfriston Road. Through the required communication and engagement components of the conditions of consent, I consider the proposed approach to be reasonable. However, there may be benefit in noting the particular sensitivity of this receiver location in the conditions such that engagement is appropriately focussed, if this can be included in a schedule or other means within the conditions of consent – to which I defer to the planning experts.</p> <p>59C was not considered in the ONVE as the property is noted as within the designation. The Requiring Authority will need to confirm at the hearing specific levels at 59C, if it is to be retained as part of the proposed designation, and subsequently what mitigation may be required as a result of the predicted levels.</p>
NoR 4	<p>Khamis (11 Zoe Court)</p> <p>Goldring (160 Manuroa Road)</p> <p>Hora (200 Alfriston Road)</p> <p>Fleming (3 Sheriff Place)</p>	<p>Concern was raised regarding construction noise and vibration effects, including noting vibration in peat soil conditions.</p> <p><i>Comment: The proposal sets out the limits and how construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects, I consider this to be a reasonable approach. This applies irrespective of soil type and should the soil type materially impact the level of vibration from the proposed works this would be required to be considered within the CNVMP and Schedules.</i></p>
NoR 4	Grewal (31 Calumet Way)	<p>Concern was raised regarding operational vibration effects, noting existing vibration effects.</p> <p><i>Comment: The proposal sets out the limits and how construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects, I consider this to be a reasonable approach.</i></p> <p><i>I have commented on vibration earlier in my review and have recommended condition wording change aiming to provide greater certainty of design and maintenance of roads to minimise and avoid adverse vibration effects.</i></p>

	<p>Alda Investments Limited and DNIT (164-166 Porchester Road)</p>	<p>Concern was raised regarding:</p> <ol style="list-style-type: none"> <li>1. Construction noise and vibration;</li> <li>2. That traffic volumes were not consistent between NoR 2 and NoR4 which could change the predicted noise levels and mitigation required; and</li> <li>3. That any building mitigation to control future road noise should best be installed now given the apartment buildings are currently under construction to avoid waste and costs associated retrofitting.</li> </ol> <p><i>Comment:</i></p> <p><i>The proposal sets out the limits and how construction noise and vibration will be required to be managed (via a CNVMP) to mitigate potential effects, I consider this to be a reasonable approach.</i></p> <p><i>I defer to the traffic experts regarding the assumed traffic volumes forming part of the assessment. Should changes be made to these traffic volumes the applicant would need to confirm whether these volume changes are sufficient to result in differing noise level predictions. I note that a large change in traffic volumes is typically required to generate a meaningful change in noise levels.</i></p> <p><i>The ONVE appears to assess noise at the previously existing dwellings (understood to now have been demolished), none of which are identified to be in Category C which would trigger consideration of at property treatment options. The applicant would need to confirm specific levels at the under-construction apartments and identify whether they would sit in Category C and therefore whether at property treatment is likely to be required.</i></p>
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- 5.3 On December 7, 2023, the Manurewa Local Board provided Local Board Views on the South FTN NoRs under resolution number MR/2023/219.
- 5.4 The Manurewa Local Board resolution expressed concerns about potential noise impacts on residents who find themselves living closer to the road on Great South Road, Alfriston Road and Porchester Road.
- 5.5 The predicted change in noise levels at receivers along the roads in question vary depending on the receivers. However, due to the proposed use of a low-noise road surface, and in some cases changes to traffic volumes and speeds, in general the change in noise levels at most receivers along the roads above is predicted to be in the range of  $\pm 2$  dB. This level of change in noise would be generally imperceptible.

**6 Conclusions and Recommendations**

- 6.1 The assessment considered in this memo does not identify any reasons to not confirm the NoR. The aspects of the proposal considered by this memo could therefore be confirmed, subject to the proposed conditions with suggested modifications as detailed below.

## 7 Recommended Conditions and Advice Notes

7.1 Should the NoRs be confirmed, the draft conditions provided by the applicant are recommended to avoid, mitigate, or remedy environmental effects of the proposal and to implement mitigation proffered by the Requiring Authority. I have made suggested changes to a small number of these draft conditions, based on my comments above.

7.2 Whilst the condition wording appears generally consistent across the NoRs, the numbering may not always be the same for the same condition in each NoR. To avoid duplication, I have commented on the condition wording for NoR 1 which can then be adapted to the other NoRs as necessary.

### *Traffic Noise Standards (Unnumbered condition before Condition 30 from NoR 1)*

7.3 Based on my paragraphs 4.13 to 4.17, I recommend the following wording is added at the end of this condition to capture the requirement to consider noise levels at future dwellings.

Notwithstanding the above applying to the PPFs in Schedule 4, conditions 30 to 41 shall be read as also including a requirement for the future BPO assessment to determine the BPO for the environment that is present prior to construction starting (in terms of road surface, barriers, or other source noise mitigation), noting that the Requiring Authority is not responsible for acoustically treating dwellings that are constructed following the lodgement of the NoR.

7.4 Clause (j) of this condition refers to PPFs identified in green, orange or red in Schedule 4 of the conditions; however, the figures in Schedule 4 identify PPFs in pink. I recommend that this is corrected in the condition as follows.

- (j) Protected Premises and Facilities (PPFs) – means only the premises and facilities identified in pink ~~green, orange or red~~ in Schedule 4: PPFs Noise Criteria Categories;

### *Construction Vibration Standards (Condition 21 from NoR 1)*

7.5 I recommend that the Category B night-time criteria is changed in the Construction Vibration Standards condition for all NoRs to reflect the Waka Kotahi guidelines, as discussed in paragraph 3.4 above. The change is designed to minimise adverse amenity effects at occupied residential properties during the night-time period.

- (a) Construction vibration shall be measured in accordance with ~~ISO 4866:2010 Mechanical vibration and shock – Vibration of fixed structures – Guidelines for the measurement of vibrations and evaluation of their effects on structures~~ DIN4150-3:1999 and shall comply with the vibration standards set out in the following table as far as practicable.

**Table CNV2 Construction vibration criteria**

Receiver	Details	Category A	Category B
Occupied Activities sensitive to noise	Night-time 2000h - 0630h	0.3mm/s ppv	<u>1</u> 2mm/s ppv
	Daytime 0630h - 2000h	2mm/s ppv	5mm/s ppv
Other occupied buildings	Daytime 0630h - 2000h	2mm/s ppv	5mm/s ppv
All other buildings	At all other times	Tables 1 and 3 of DIN4150-3:1999	

\*Category A criteria adopted from Rule E25.6.30.1 of the AUP

\*\*Category B criteria based on DIN 4150-3:1999 building damage criteria for daytime

- (b) Where compliance with the vibration standards set out in Table 21.1 is not practicable, the methodology in Condition 23 shall apply.

*Low Noise Road Surface (Condition 29 from NoR 1)*

7.6 I recommend changes to the Low Noise Road Surface condition for all NoRs to reflect my comments regarding consistency between the noise and vibration effects of the as-built road and the effects assumed as part of the assessment.

- (a) Asphaltic concrete surfacing (or equivalent low noise road surface) shall be implemented within 12 months of Completion of Construction of the project.
- (b) The road surface shall be designed, implemented and maintained to be smooth and even to avoid adverse vibration generated from traffic passing over uneven surfaces.
- (c) ~~(b)-Any future resurfacing works of the Project shall be undertaken in accordance with the Auckland Transport Reseal Guidelines, Asset Management and Systems 2013 or any updated version and asphaltic concrete surfacing (or equivalent low noise road surface) shall be implemented. where~~
  - ~~(i) — The volume of traffic exceeds 10,000 vehicles per day; or~~
    - ~~a. — The road is subject to high wear and tear (such as cul de sac heads, roundabouts and main road intersections); or~~
    - ~~b. — It is in an industrial or commercial area where there is a high concentration of truck traffic;~~
    - ~~or~~
    - ~~c. — It is subject to high usage by pedestrians, such as town centres, hospitals, shopping centres and schools.~~

~~Prior to commencing any future resurfacing works, the Requiring Authority shall advise the Manager if any of the triggers in Condition 24(b)(i) — (iv) are not met by the road or a section of it and therefore where the application of asphaltic concrete surfacing (or equivalent low noise road surface) is no longer required on the road or a section of it. Such advice shall also indicate when any resealing is to occur.~~







**Memo: Technical specialist memorandum for notices of requirement for South FTN: Urban Design**

17 February 2024

To: Cheryl Cleary, Consultant Planner, Plans and Places, Auckland Council

And to: Joy LaNauze, Senior Policy Planner, Central/South Planning Team, Plans and Places, Auckland Council

From: Lisa Mein, Senior Urban Designer, Mein Urban Design and Planning Limited

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**Subject: Notices of Requirement: South Frequent Transit Network, Urban Design Review**

**1 Introduction**

- 1.1 Auckland Transport, as requiring authority, has lodged four NoRs for new designations to authorise transport upgrades along key sections of roads that fall within and will enable the South Frequent Transit Network project (**South FTN**). As described within the AEE, the South FTN is intended to address deficiencies in the existing transport network between Manukau and Drury, in particular a lack of provision for high-quality public transport and lack of safe active mode facilities that encourage walking and cycling.
- 1.2 The road upgrades enabled by the NoRs provide for the operation of high quality FTN bus services along Great South Road between Manukau and Drury, known as the Great South Road FTN route, and along existing roads between Manurewa, Takaanini and Papakura, known as the Takaanini FTN route, and upgrades to adjoining key connections to the FTN routes.
- 1.3 Of the full 32km length of the South FTN (refer to **Error! Reference source not found.**), only a portion falls within the proposed NoRs because the proposed FTN upgrades do not always require additional land take. Where road upgrade works do not fall within one of the four proposed designations, it is presumed the works can either be carried out within existing road reserves or will be provided for through future designation processes.

1.4 The NoRs are outlined below:

- a. NoR 1: Great South Road FTN Upgrade (comprises eight separate sections along Great South Road between Manukau and Drury)
- b. NoR 2: Great South Road Upgrade (a 520m section of Great South Road in Drury)
- c. NoR 3: Takaanini FTN – Weymouth, Alfriston and Great South Road Upgrades
- d. NoR 4: Takaanini FTN – Porchester Road Upgrade and Popes Road Upgrade

## **2 Qualifications and Relevant Experience**

2.1 My name is Lisa Kate Mein.

2.2 I hold the qualifications of Bachelor of Planning from University of Auckland (1994) and Master of Arts (Urban Design) from the University of Westminster in London (2001). I am a full member of Te Kokiringa Taumata - the New Zealand Planning Institute, a member of ICOMOS NZ and a member and current co-chair of the Urban Design Forum Aotearoa. I am also a certified Resource Management Hearings Commissioner and sit on a number of hearing panels around the country, including the Auckland Council Hearings Panel.

2.3 I have in excess of 28 years' experience as an urban designer and planner in New Zealand, the UK and Ireland. I am a Director and Senior Urban Designer at Mein Urban Design and Planning Limited. Prior to establishing Mein Urban Design and Planning Limited in 2019, I worked for Boffa Miskell Limited for fifteen years. In the final three years of that time, I was a Senior Principal and managed the Auckland Urban Design and Landscape Planning team.

2.4 Recent relevant experience includes the following:

### **Auckland Council, Airport to Botany NoR, 2023**

Urban design review of the five NoRs, lodged jointly by Auckland Transport and Waka Kotahi NZ Transport Agency, to enable the Airport to Botany Bus Rapid Transit Route. This included attendance at briefing meeting and site visit with Te Tupu Ngātahi - Supporting Growth Alliance, review of submissions as they related to urban design, preparation of an urban design memo to inform the s42A report. It also included attendance at the hearing (online) to listen to the Requiring Authority and submitters, give a brief statement and respond to questions from the panel.

### **Auckland Council, Private Plan Change 73, 2021 – 2022**

Urban design review of Proposed Private Plan Change 73 to the AUP-OP to rezone land from Rural – Mixed Rural to Residential – Mixed Housing Urban and to introduce a new precinct, review of submissions/ further submissions as they related to urban design. This included preparation of material for s42A report and attendance at the Council hearing to give a brief statement and answer questions from the panel.

### **Auckland Council, Private Plan Change 58, 2020 – 2021**

Urban design review of Proposed Private Plan Change 58 to the AUP-OP to live zone land in Drury from Future Urban zone to Residential - Mixed Housing Suburban zone

and submissions/ further submissions. Included preparation of material for the s42A report.

**Auckland Council, Private Plan Change 52, 2020 – 2021**

Urban design review of Proposed Private Plan Change 52 to the AUP-OP to live zone land in Drury from Future Urban zone to Residential - Mixed Housing Urban zone and submissions/ further submissions. Included preparation of material for the s42A report.

**Auckland Council, Auckland Unitary Plan Plan Change 34 2019 –2020**

Preparation of a character statement for Howick Village (Howick Business special character area), including amendments to the planning maps to add four new sites to the special character area and identification of character buildings. Assistance with s32, preparation of material for s42A report and attendance at Council hearing.

**Auckland Council, Auckland Unitary Plan Proposed Plan Change 25 (Private) – 2019- 2021**

Urban design review of Proposed Private Plan Change 25 to the Auckland Unitary Plan and submissions/further submissions. Included preparation of material for the s42A report, attendance at the Council hearing and assistance with preparation of the Council's closing statement. Subsequent urban design witness to an Environment Court appeal by Middle Hill to PC25.

**Auckland Unitary Plan Hearings 2014-2016**

A key role for Auckland Council on the Special Character overlay provisions of the Proposed Auckland Unitary Plan throughout the Independent Hearing Panel process and at the Environment Court

**3 Code of Conduct**

- 3.1 The memo is my expert technical evidence on the South FTN NoRs and submissions relevant to my areas of expertise. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this memo and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person(s), this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 3.2 I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## **4 Overview and Scope of Technical Memorandum**

- 4.1 In drafting this memo, I have reviewed the following documents:
- a. South Frequent Transit Network Assessment of Effects on the Environment, by Te Tupu Ngātahi, dated 13 October 2023
  - b. South FTN NoRs 1-4 Form 18, dated 11 October 2023
  - c. South FTN General Arrangement Plan – NoR 1, dated 13 October 2023
  - d. South FTN General Arrangement Plan – NoR 2, dated 13 October 2023
  - e. South FTN General Arrangement Plan – NoR 3, dated 13 October 2023
  - f. South FTN General Arrangement Plan – NoR 4, dated 13 October 2023
  - g. South Frequent Transit Network Urban Design Evaluation (UDE) and Appendix A Parts 1-6 to the UDE, prepared by Harry Linford, Elaine Chen and Stuart Bowden from Beca as part of Te Tupu Ngātahi, dated 13 October 2023
  - h. Response to s92 request dated 10 November 2023
  - i. Submissions related to the South FTN NoRs
- 4.2 I have also read the technical memoranda for Auckland Council by Rob Pryor on landscape issues and Daniel Kinnoch with respect to Parks. I defer to their respective expertise in these areas, noting Rob has focused on the corridor from a landscape and visual perspective and Daniel's report has focused on the actual or potential effects of the designation on the many parks alongside the network that may be variously affected by construction works or operation.
- 4.3 My former colleague, Jennifer Esterman, participated in an applicant-led bus tour of the full length of the FTN site on 14 September 2023, this gave an oversight of the full extent of the South FTN corridor and the specific NoR locations. Since that date I have undertaken a separate site visit to the various locations on 29 January 2024, to gain a better understanding of the context for the four NoRs prior to completing this memo.
- 4.4 This technical memorandum assesses urban design considerations and any actual or potential effects on amenity associated with these NoRs. These are addressed separately for each NoR, to assist the preparation of the Council's reporting planner's report under s42A of the RMA.

## 5 Background

- 5.1 As set out in the AEE, the project is part of a wider strategic transport network planned to meet the demands of existing and future urban growth in South Auckland. As stated in the introduction, the South FTN comprises a series of transport upgrades along existing arterial roads between Manukau and Drury. The project is intended to alleviate existing transport deficiencies by expanding the reach of frequent public transport and enable mode shift to public transport and active modes in South Auckland.

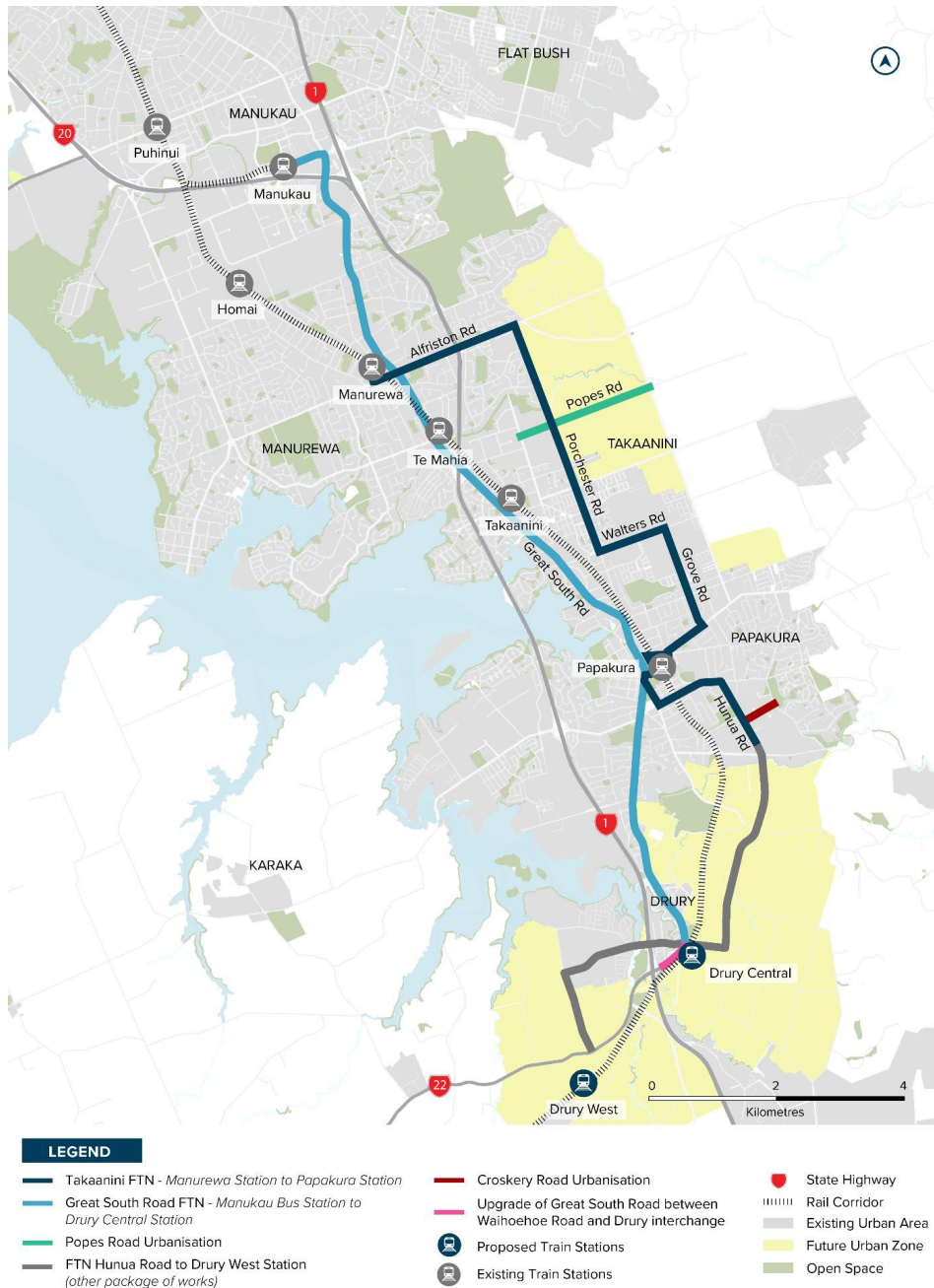


Figure 1: Full project extent

5.2 The extent of the NoRs are illustrated in **Error! Reference source not found.** This diagram depicts the overall FTN routes the proposed NoRs will support and enable. These FTN routes are:

- the Great South Road FTN route, which runs along Manukau Station Road and Great South Road between Manukau and Drury; and
- the Takaanini FTN route which runs along Weymouth Road, Alfriston Road, Porchester Road, Walters Road, Grove Road, Clevedon Road, Railway Street West, Wood Street, Great South Road, Ōpaheke Road, Settlement Road and Hunua Road.

5.3 In addition to the two FTN routes, the South FTN also includes Key Connections, adjoining the two FTN routes. Within these Key Connections corridor widening, new and upgraded active mode facilities and intersection improvements are proposed. These Key Connections are also illustrated in **Error! Reference source not found.** and comprise:

- the section of Great South Road in Drury between Waihoehoe Road and the SH1 Drury Interchange; and
- Popes Road between Takanini School Road and Porchester Road.

5.4 Overall, the four NoRs are being sought to enable the implementation of the South FTN. The NoRs being sought, illustrated in Figure 2, relate to discrete locations within the wider 32km South FTN project. The South FTN as a whole proposes an array of bus priority measures, active mode improvements, intersection improvements, bridges and stormwater management devices. The specific improvements the NoRs will enable include the following:

#### **Bus Priority Measures**

- 5km of two-way bus lanes and 7.7km of northbound bus lanes on Great South Road as part of the Great South Road FTN
- 1.7km of two-way bus lanes on Alfriston Road as part of the Takaanini FTN

**Active mode improvements** throughout the project

#### **Intersection improvements**

- Upgrades to eight key intersections on Great South Road (NoR 1)
- Upgrades and tie-ins to eight key intersections as part of the Takaanini FTN (NoR 3)

**Replacement to four existing bridges at:**

- Otūwairoa / Slippery Creek (NoR 1)
- Hingaia Stream (NoR 2)
- Weymouth Road bridge over the North Island Main Trunkline (NIMT) (NoR 3)
- Alfriston Road bridge over SH1 (NoR 3)

**Stormwater management devices** across the project



Figure 2: NoR extents

## 6 Te Tupu Ngātahi Supporting Growth - Urban Design Evaluation

- 6.1 I reviewed both the draft and lodged Urban Design Evaluation (**UDE**) and concluded that overall, I support the approach and methodology to identifying and assessing the urban environment and how the project will impact upon it. In particular I support the opportunities and outcomes identified for the project and consider these to be necessary, as the project develops through the design stages, to ensure appropriate outcomes for safe and attractive urban environments.
- 6.2 It is clear from the AEE and supporting material that it is not intended for the Project to be constructed in the short term. At this stage only a concept level of design has been undertaken, to inform the proposed designation footprint and to assess an envelope of effects, noting that the NoRs proposed are identified to address specific issues largely related to access to public transport and opportunities to enhance travel choice. Overall, the full length of the route proposed is considered appropriate from an urban design perspective to safeguard the network for public transport and active modes to support the growing population in South Auckland.
- 6.3 As stated within the UDE the proposed corridor passes through a highly varied and urbanised urban environment in South Auckland. The UDE also notes that a significant portion of both the Great South Road and Takaanini FTN corridors are within a walkable catchment of train stations including Manukau, Manurewa, Te Mahia, Takaanini and Papakura. Furthermore, the urban form is planned to change through Auckland Council's proposed plan change 78 (**PC78**) to accommodate mixed and more intensive residential land uses in accordance with the requirements of the NPS-UD and the MDRS.
- 6.4 I note that while the UDE was prepared to support the four NoRs, it provides an overview of the urban design considerations and inputs for the full extent of the South FTN (i.e. including interventions outside the boundaries of the NoRs) and an evaluation and identification of future transport and land use integration opportunities for the project. As stated in paragraph 5.4 of this memo, the NoRs generally seek to provide for road widening to accommodate bus priority measures, walking and cycling facilities, key intersection upgrades, replacement of specific existing bridges and other associated works including stormwater management devices.
- 6.5 The UDE evaluates the urban design matters common to the South FTN project as an overall network and specific evaluations for seven sections of the project corridor defined by the urban context. As stated within the UDE, the project traverses a highly urbanised part of south Auckland with varied morphology that stretches from Manukau in the north to Drury in the south. It connects through the town centres of Manurewa, Takaanini and Papakura. The seven sections subject to the evaluation reflect the existing urban morphology.
- 6.6 The evaluation addresses the corridors as integrated and connected elements and then looks at these in the broader urban context, evaluating against the Urban Design Framework Principles. The Urban Design Framework Principles were established to guide all the projects being led by Te Tupu Ngātahi. The Design Framework Principles are articulated in Figure 3. The full detail of these is attached as Appendix B to the



UDE and include a summary of the adopted principles, outcomes, and measures for Environment, Social, Built Form, Movement and Land Use.

System layers	Design Principles
<b>Environment</b>	1.1 Support and enhance ecological corridors and biodiversity
	1.2 Support water conservation and enhance water quality in a watershed
	1.3 Minimise land disturbance, conserve resources and materials
	1.4 Adapt to a changing climate and respond to the microclimatic factors of each area
<b>Social</b>	2.1 Identity and place
	2.2 Respect culturally significant sites and landscapes
	2.3 Adaptive corridors
	2.4 Social cohesion
	2.5 Safe corridors
<b>Built form</b>	3.1 Align corridors with density
	3.2 Corridor scaled to the surrounding context and urban structure
	3.3 Facilitate an appropriate interface between place and movement
<b>Movement</b>	4.1 Connect nodes
	4.2 Connect modes
	4.3 Support access to employment and industry
	4.4 Prioritise active modes and public transport
	4.5 Support inter-regional connections and strategic infrastructure
	4.6 Support legible corridor function
<b>Landuse</b>	5.1 Public transport directed and integrated into centres
	5.2 Strategic corridors as urban edges

Figure 3: Te Tupu Ngātahi Design Framework Principles

6.7 The seven sections proposed for evaluation are described in Table 2-2 and illustrated in Figure 2-3 of the UDE, noting not all of these are confined to the proposed NoRs, some extending beyond the proposed NoRs. For the purposes of this memo, the relevant sections described within the UDE are:

- Great South Road 2: Great South Road between Orams Rd to Coles Crescent (NoR 1 and NoR 3)
- Great South Road 3: Great South Road from the intersection with Beach Road/ Settlement Road to the Drury Interchange (NoR 1 and NoR 2)

- Alfriston Road: Weymouth Road and Alfriston Road from the intersections with Selwyn Road to Porchester Road (NoR 3)
  - Porchester and Popes Road, including Walters Road, along Bruce Pulman Park (NoR 4)
  - Papakura Central – Great South Road FTN and Takaanini FTN including portions of Great South Road, Clevedon Road, Railway Street West, Wood Street, Ōpāheke Road and Settlement Road.
- 6.8 Section 4 of the UDE evaluates the common urban design matters relevant across the full extent of the South FTN, this is set out in a table with the relevant Design Framework Principle, an explanation of that principle and, where applicable, its application to the proposed NoRs. This methodology has been used to evaluate previous NoRs by Te Tupu Ngātahi including those for Airport to Botany and the North-West. In my opinion this is a robust methodology that has appropriately described the existing context including the land surrounding the wider network, how the proposed corridor interventions will impact on that and importantly identifies opportunities that can be further refined during the detailed design stage (where applicable). However, while this approach has worked well for other NoRs that include setting aside land for new corridors or corridor widening within an existing network, it has not been adapted to address the discrete and segregated locations within NoR 1 in particular. Furthermore, the opportunities identified extend well beyond the areas identified for the NoRs, which somewhat weakens its potential application within the conditions.
- 6.9 The UDE then distils the full network into the seven sections based on their urban morphology. As mentioned in paragraph 6.7 not all of these are relevant to the NoRs as in some locations, such as the area around Manukau city centre, the corridor upgrades proposed for the South FTN can be accommodated within the existing road reserve.
- 6.10 The UDE recommends preparation of an Urban and Landscape Design Management Plan (**ULDMP**) to address and further develop the specific urban design outcomes recommended within the UDE. The ULDMP forms Condition 12 to all four NoRs. Under condition 12 a ULDMP is required to be prepared prior to the start of construction for a stage of work. I support this. It is considered that generally the detailed design matters can be addressed through proposed condition 12 to further develop the urban design outcomes and additional urban design opportunities through Outline Plans of Works for each of the NoRs. However, in my view where the urban design and land use integration opportunities are identified in relation to specific NoRs, it is important that this is appropriately articulated within the ULDMP condition.

## **7 NoR 1 – Great South Road FTN Upgrade**

- 7.1 NoR 1 comprises eight distinct intersection upgrades for the Great South Road FTN route between Manukau and Drury (see Figure 4 overleaf). As stated within the AEE, Great South Road is sufficiently wide to accommodate the desired corridor form and function for most of the route length. The eight NoR sections are required at the key intersections set out below to provide for bus priority measures, walking and cycling facilities, eight key intersection upgrades, replacement of the existing Otūwairoa / Slippery Creek bridge, and stormwater management devices.

### NoR 1 key intersections (North to South)

- 1A – Great South Road / Browns Road / Orams Road
- 1B – Great South Road / Grand Vue Road
- 1C – Great South Road / Mahia Road
- 1D - Great South Road / Taka Street / Walter Strevens Drive
- 1E - Great South Road / Subway Road
- 1F - Great South Road / Wellington Street
- 1G – Great South Road / Beach Road / Settlement Road
- 1H - Great South Road / Park Estate Road
- 1I - Great South Road / Otūwairoa Stream / Slippery Creek Crossing

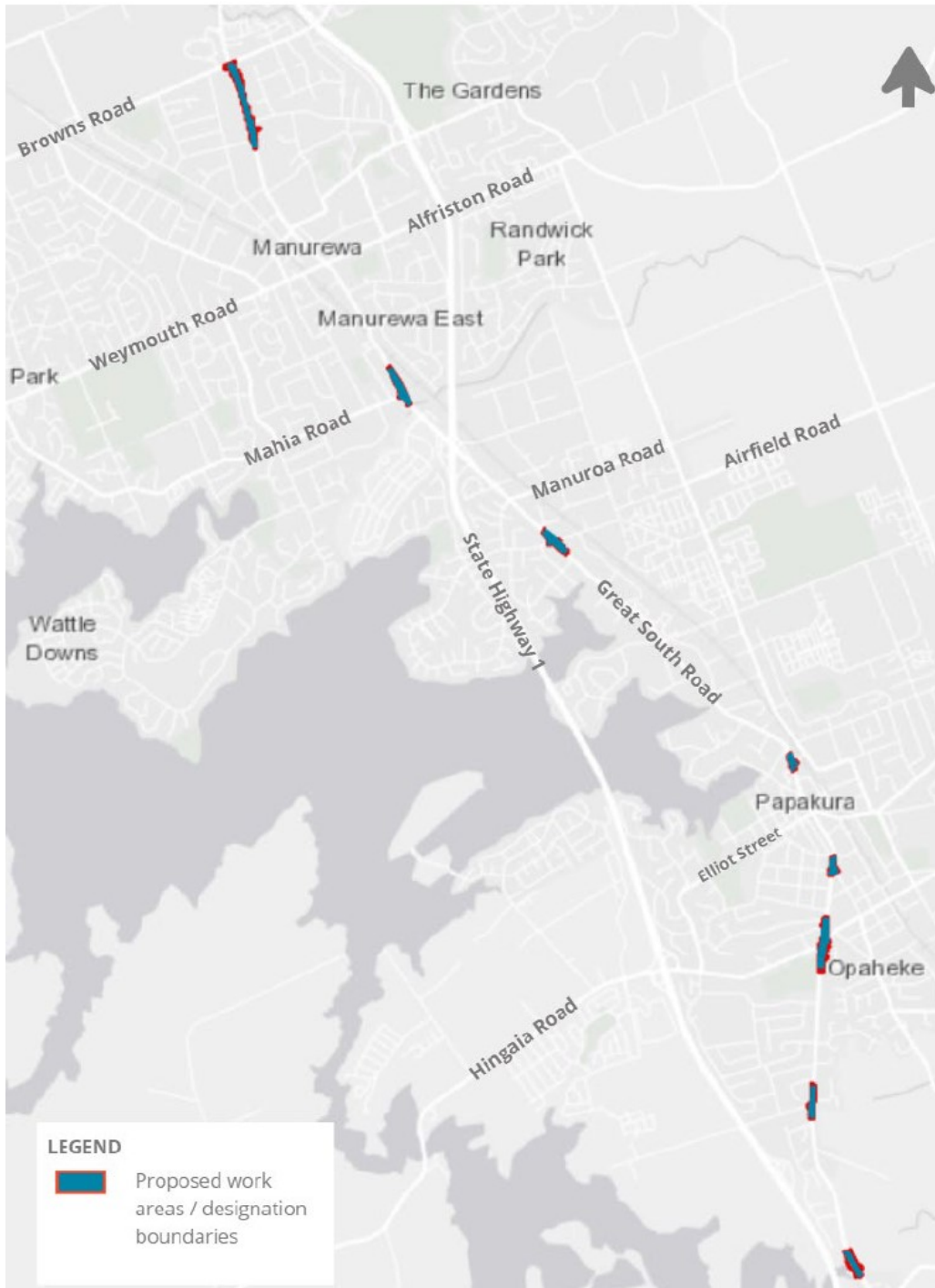


Figure 4: Extent of NoR 1 – Great South Road FTN Upgrade

7.2 The proposed extents of NoR 1 and their respective current zoning within the AUP(OP) are illustrated in Figure 5. The land uses lining the Great South Road FTN are predominantly residential, commercial and industrial. As stated in the UDE, corridor widening is proposed at several intersections and at Ōtuwairoa Stream as part of NoR 1, which provides localised widening to accommodate improved active mode and public transport facilities.

7.3 NoR 1 sections 1A and 1B are located in close proximity to the south of Manukau City Centre. At present these are Mixed Housing Urban but are proposed to be upzoned to THAB under PC78. Two neighbourhood centres, which serve their respective neighbourhood catchments, are located in this section of Great South Road: one at the intersection with Browns and Orams Roads and another smaller one at the intersection with Grande Vue Road. Anderson Park, zoned Informal Recreation, is located opposite the smaller neighbourhood centre at the junction of Grande Vue Road. General Arrangement Layout Plan (**GALP**) NoR 1 – Sheet 1 indicates a considerable portion of

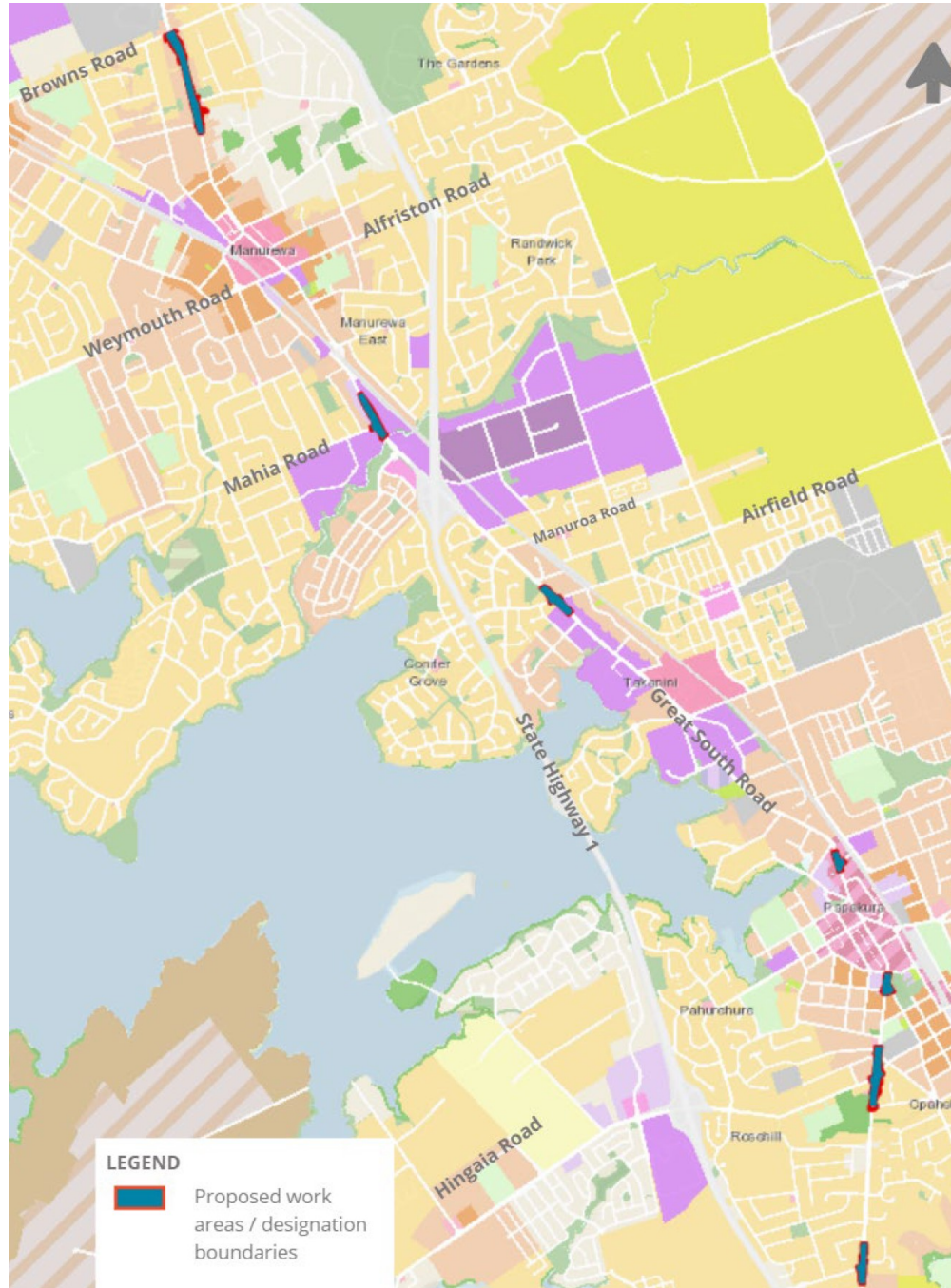


Figure 5: Existing zoning in the AUP surrounding NoR 1

the neighbourhood shops at both intersections are included within the designation boundary. It also indicates upgrade to an existing active modes facility within Anderson Park.

- 7.4 NoR 1 section 1C is located proximate to Te Mahia train station (NoR 1 Sheet 2) and is zoned Light Industry on Great South Road on both sides south of Mahia Road and on the eastern side north of Mahia Road, and zoned Business Mixed Use on the western side of GSR (north of Mahia Road). Proposed zoning remains similar, albeit the wider area is likely to be upzoned to THAB. GALP NoR 1 – Sheet 2 indicates the designation extends over sites on both sides of Great South Road, that appear to accommodate car parking, to enable a berm and proposed active modes on the property side of the berm.
- 7.5 NoR 1 section 1D is located within close proximity to Takaanini train station. Currently the land to the north of the Great South Road / Taka Street/ Walter Strevens Drive intersection is zoned residential – a combination of Mixed Housing Suburban to the west of Great South Road and Mixed Housing Urban to the east. This is proposed to be upzoned to THAB through PC78. Business-Light Industry zone is located to the south of the intersection. St Aidan’s Reserve is located at the north-western edge of the NoR extent. GALP NoR 1 - Sheet 3 indicates that most of the active modes can be accommodated within the existing road reserve but some additional land is proposed to be designated at the intersection.
- 7.6 There are two sections of NoR 1 within Papakura centre. Section 1E is located at the northern extent of Papakura on land zoned Business – Metropolitan Centre. GALP NoR 1 - Sheet 4 indicates additional land for the designation on the eastern side of Great South Road on both sides of Subway Road, but not what this is required for. Section 1F is located just to the south of the centre, within close proximity to the Papakura train station, in an area with Mixed Use, THAB and open space in the form of Central Park. GALP NoR 1 - Sheet 5 indicates considerable additional land within Central Park as well as land on the south-western side of the intersection with Wellington Street, but not what this is required for.
- 7.7 NoR 1 section 1G is located within a largely suburban area of Rosehill/Ōpaheke at the junction of Great South Road with Beach Road and Settlement Road. This is currently zoned for Mixed Housing of various densities with Papakura cemetery on the northern side of Settlement Road, a Neighbourhood centre to the southwest of the Beach Road intersection, adjacent to Kirks Bush nature reserve. This section is likely to form the southern extent of the walkable catchment for Papakura train station and as such the residentially zoned land is proposed to be upzoned from MHS and MHU to MHU and THAB respectively. GALP NoR 1 - Sheet 6 indicates a number of residential properties on the eastern side of Great South Road are proposed to be included within the designation for construction purposes.
- 7.8 The two southern most sections are located closer to Drury, within the area that is earmarked for considerable redevelopment and intensification and has been the subject of several plan changes to give effect to the intent of the Drury-Ōpaheke Structure Plan, albeit little of this development has occurred to date. Similar to section 1G, the current zoning surrounding NoR 1 section 1H is predominantly MHS with some MHU on the eastern side of Great South Road to the north of Gatland Road as a

consequence of PC58. Through PC78 it is likely that all the surrounding residential land will be upzoned to MHU. GALP NoR 1 – Sheet 7 indicates that several residential properties on both sides of Great South Road will be affected by the designation boundary. The final section of NoR 1 is 1I which includes a replacement to the Otūwairoa / Slippery Creek bridge. Zoning includes a mix of residential, industrial, and Future Urban. As indicated in GALP NoR 1 – Sheet 8, the designation boundary extends both east and west in order to provide land for construction of the bridge and batters.

7.9 Concept design for NoR 1 is based on the four-lane and three-lane FTN arterial cross sections (see Figure 7 below).



*Figure 6: typical four-lane and three-lane FTN arterial cross sections applied to sections of the Great South Road FTN*

7.10 The way the UDE is drafted does not directly correspond to the sections of NoR 1. However, there are general recommendations in relation to the whole Great South Road FTN and recommendations for Great South Road 2, Great South Road 3 and Papakura Central, in particular, that should inform the ULDM for NoR 1. This will ensure the detailed design of the sections of NoR 1 respond appropriately to the principles and project specific urban design outcomes sought. These include the following:

- A landscape plan that incorporates recommendations from other specialist assessments. The landscape plan should outline an approach that prioritises retention and protection of established mature trees along the edges of parks such as Anderson Park, Kirks Bush, Central Park and Papakura cemetery. Future design stages should consider the requirement of a berm and accommodation of active mode facilities within land zoned open space to avoid impact to identified mature trees.
- While provision for active modes is a positive outcome, little space is provided for amenity planting and water sensitive design elements that support adaptation to climate change. Future design stages could consider opportunities to support

these outcomes on land that may no longer be required post-construction within NoR 1, particularly around the Otūwairoa Stream.

- At future design stages consider visual integration, interface and sense of place considerations for the proposed bridge structure within NoR 1 across the Otūwairoa Stream.
- Opportunities for input from Mana Whenua on cultural landscape and design matters including how the project outcomes reflect their identity and values.
- Identification, development and integration of key local community and identity drivers to deliver a positive contribution to sense of belonging, community resilience and local access to amenities. In relation to NoR 1 this includes the neighbourhood centres, such as those on the corners of Browns Road/Orams Road/Great South Road and Grande Vue Road/ Great South Road as well as Te Mahia train station entrance, Papakura War Memorial, Papakura Old Central School hall and First Presbyterian Church historic heritage sites as well as the parks mentioned above. Future design stages need to demonstrate how these can be redeveloped and reintegrated post construction to support local communities.
- An urban integration approach should be developed in future design stages to redefine and integrate land that may no longer be required post construction to support adjacent land use.
- The corridor generally provides diverse transport choices and connectivity between FTN facilities, centres and local amenities, however future design stages need to ensure this enhances connectivity and legibility at the micro and macro scales in particular prioritising active modes at existing and proposed crossing points and at the many intersections along the route.
- CPTED review to address interchanges, connections to train stations and bridge environments.

7.11 I support inclusion of these recommendations to inform the ULDMP, which is required to be prepared prior to the start of construction for each stage of work. This will ensure the detailed design of the corridor responds appropriately to the principles and project specific urban design outcomes sought.



## **8 NoR 1 Submissions Received:**

- 8.1 Thirty-three submissions in total were received relating to NoR 1. These raise a number of issues of relevance to urban design which are set out below under key themes of urban design, amendment to the ULDMP condition and property effects relating to the extent of corridor.

### **Urban Design**

- 8.2 Submissions by Manurewa Business Association Incorporated (NoR 1 - 32) and Southmall Manurewa (NoR 1 - 33) support the intent of the Great South Road FTN to provide improved transport mode connections and services but consider there needs to be better integration with Manurewa Town Centre and Southmall Manurewa for connectivity, accessibility, safety and attractiveness of the area. In the view of these submitters, blocking and bypassing the southern access to Southmall is contradictory to the town centre integration intended by the FTN. From the GALPs it appears that NoR 1 will not affect Manurewa Town Centre or Southmall. However, NoR 3, which extends from the junction of Weymouth Road and Selwyn Road and along Alfriston Road will have a significant impact on the southern edge and access to Manurewa Town Centre and Southmall. Accordingly, this is addressed in relation to NoR 3 below.

### **Amendment to ULDMP Condition**

- 8.3 Kāinga Ora (NoR 1- 31) has submitted on all four NoRs. The agency supports the intent of the NoRs to support planned urban growth and enable mode shift to public transport and active modes in South Auckland. However, Kāinga Ora has expressed concern that there is a lack of clarity and certainty around the extent of proposed dedicated bus lanes. They are therefore seeking amendments to the ULDMP condition to ensure integration with existing sections of bus lanes on the proposed FTN corridors. I am not convinced that those amendments are required within the ULDMP condition, which is already quite cumbersome. I consider the current wording is sufficient. However, if any further amendment was needed for clarification, it could simply be the addition of “throughout the network” to condition 12 (iii)(f).

### **Property Effects – Extent of NoR**

- 8.4 Two submitters raised concerns with the extent of widening proposed as part of the designation. This is not solely an urban design issue; however, the take of land also affects the built form and public realm outcomes at the edge of the corridor and therefore I am addressing the submissions that raise issues pertinent to urban design here.
- 8.5 Restaurant Brands Limited (NoR 1 – 22) is the leaseholder of a property at 86-88 Great South Road which is currently occupied by a KFC drive-through restaurant and has rights to park on the neighbouring property at 84 Great South Road. These properties are affected by the extent of the proposed designation at section 1E, which will necessitate the removal of an 8m high freestanding identification sign and a 6.5m high lighting column. It will also reduce the width of the landscape buffer that currently exists between the parking area and Great South Road. The submitter is concerned

that this will affect their ability to comply with the landscape standard H9.6.7 of the AUP(OP). The submitter is seeking a modification to the extent of the requirement so that it does not include its site. While not solely an urban design issue, the take of land in this situation affects public realm outcomes at the edge of the corridor. The ULDMP condition has as one of its objectives to enable integration of the project's permanent works into the surrounding landscape and urban context and requires landscape details prior to construction. In my opinion the concerns expressed by the submitter in relation to the landscape buffer can be addressed through the ULDMP condition at the appropriate design stage.

- 8.6 Z Energy Limited (NoR 1 – 30) has submitted on NoRs 1 and 3. The submission relates to Z Takanini and the Burger King Drive thru at 166 Great South Road, which is affected by section 1D of NoR 1. More specifically 220m<sup>2</sup> along the full length of the Great South Road frontage of the site is included within the proposed designation, which includes the existing front yard signage and landscaping. As stated above, some of the submitter's concerns with respect to the frontage can be adequately addressed via condition 12. I also note Z Energy supports condition 12(d) which sets out the requirement for key stakeholders, identified through condition 9, to be invited to participate in the development of the ULDMP.

## 9 NoR 2 – Great South Road Upgrade (Drury Section)

- 9.1 As depicted in Figure 2 and described in paragraph 5.3, NoR 2 is one of the Key Connections. NoR 2 enables the upgrade of approximately 520m of Great South Road in Drury between Waihoehoe Road, within close proximity to the proposed future Drury train station, and the SH1 Drury Interchange to the west.
- 9.2 According to the AEE and UDE, the NoR enables two traffic lanes per direction, walking and cycling facilities, replacement of the Hingaia Stream bridge and localised provision for stormwater treatment raingardens. The intent is to urbanise this key section of Great South Road in order to support the transport network and provide for multi-modal movements to support predicted population growth. The Hingaia Stream bridge will be upgraded to provide for the 1 in 100-year flood event and minimise disruptions in the event of flooding.
- 9.3 To accommodate these facilities the four-lane arterial cross-section illustrated in Figure 8 is proposed as the basis for concept design.



Figure 7: Four-lane arterial cross section

- 9.4 The zoning is depicted in Figure 8 and is comprised predominantly of commercial (Metropolitan Centre and Mixed Use) and industrial uses with a portion of open space to the south of Great South Road, between the NIMT and SH1 interchange. The zoning is unlikely to change dramatically as it reflects recent plan changes to give effect to the intent of the Drury-Ōpaheke Structure Plan.
- 9.5 The GALP for NoR 2 indicates batters on the approach to the replacement bridge over Hingaia Stream and considerable land take on both sides of Great South Road, in particular within the open space area.
- 9.6 The UDE includes NoR 2 within Great South Road 3 (section 7 of the UDE), which extends from the Beach Road/Settlement Road intersection at the southern edge of Papakura through to the SH1 interchange at Drury. The UDE includes recommendations ensure the detailed design of NoR 2 responds appropriately to the principles and project specific urban design outcomes sought. These include the following:
- A landscape plan that incorporates recommendations from other specialist reports including treatment of embankment/retaining structures and visual integration, interface and sense of place considerations for the proposed bridge structures within NoR 2 across the Hingaia Stream.

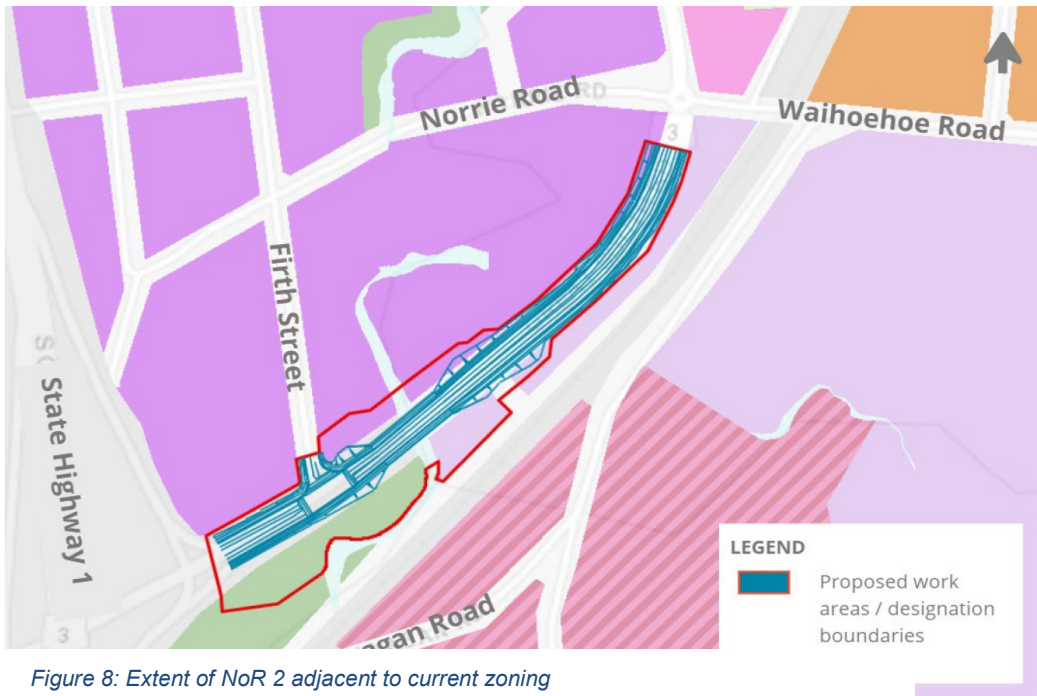


Figure 8: Extent of NoR 2 adjacent to current zoning

- While provision for active modes is a positive outcome, little space is provided for amenity planting and water sensitive design elements that support adaptation to climate change. Future design stages could consider opportunities to support these outcomes on land that may no longer be required post-construction particularly around Hingaia Stream.
  - Permeability of the corridors for active modes that addresses cross corridor connectivity (midblock crossings), modal priority and permeable access to destinations such as the entrance to the future Drury train station.
  - An urban integration approach should be developed in future design stages to redefine and integrate land that may no longer be required post construction to support adjacent land use.
- 9.7 I support inclusion of these recommendations to inform the ULDMP, which is required to be prepared prior to the start of construction for each stage of work. This will ensure the detailed design of the corridor responds appropriately to the principles and project specific urban design outcomes sought.

## **10 NoR 2 Submissions Received:**

10.1 Sixteen submissions were received relating to NoR 2. Only some of these raise a number of issues of relevance to urban design which are set out below under key themes of amendment to the ULDMP condition and property effects relating to the extent of corridor.

### **Amendment to ULDMP Condition**

10.2 As described in paragraph 8.3, Kāinga Ora (NoR 2- 14) has submitted on all four NoRs. The agency supports the intent of the NoRs to support planned urban growth and enable mode shift to public transport and active modes in South Auckland. However, Kāinga Ora has expressed concern that there is a lack of clarity and certainty around the extent of proposed dedicated bus lanes. They are therefore seeking amendments to the ULDMP condition to ensure integration with existing sections of bus lanes on the proposed FTN corridors. NoR 2 appears to focus on active modes adjacent to the traffic lanes and does not include dedicated bus lanes, therefore I am not convinced this amendment is relevant in relation to NoR 2. I consider the current wording within condition 12 to be sufficient in relation to the small section that NoR 2 relates to.

### **Property Effects Relating to Extent of Corridor**

10.3 A number of submitters are concerned with the extent of widening proposed as part of the designation. This is not solely an urban design issue; however, the take of land also affects the built form and public realm outcomes at the edge of the corridor and therefore I am addressing the submissions that raise issues pertinent to urban design here.

10.4 Broshmik Investments Limited (NoR 2- 1) and the Dunford Family Trust (NoR 2 – 2) own land at 260 Great South Road (2/260 and 1/260 respectively). These properties and the businesses operating from them are affected by the extent of the designation, in particular by the batter slope and upgraded stormwater culvert that extends into 260 Great South Road and reduces its main entrance. The submitters seek better integration with their properties and preferably retaining walls rather than batter slope. This is an edge condition issue and in my opinion is adequately addressed within the ULDMP condition – 12(g)(iii)(a) and (b), which ensures edge will need to be designed in greater detail for the final design and outline plan of works. Importantly the project should attempt to take the least area of land possible to ensure the safe construction of the Hingaia bridge and associated works.

10.5 Blue Snow Limited (NoR 2- 3) owns land at 263, 267, 271 and 275 Great South Road. The submitter has expressed concern that the designation boundary will restrict access to the business that operates there and ultimately result in its closure. The submitter has sketched some alternative solutions that would lessen the impact to their property. Access to the property is primarily a traffic issue rather than an urban design issue, however, I note that the design philosophy is to retain existing access and movement wherever feasible. Notwithstanding I consider that retention of safe and functional access to all properties should be a condition of consent.

- 10.6 Carter Holt Harvey Property Limited (NoR 2- 8) owns land at 280 Great South Road. The site is currently vacant. It is zoned Business – Mixed Use. NoR 2 affects the site in its entirety, which will restrict any ability to develop the site. However, as noted by the submitter the GALP indicates the site will be used solely for construction purposes. The submitter therefore seeks that the extent of the proposed designation be amended so that it does not directly affect the site.
- 10.7 Other submitters, Drury Tires (NoR 2 – 15) and David Hay (NoR 2 – 16) have specifically requested that 280 Great South Road is used as a base for construction contractors as this would minimise impact on their respective businesses. This is not an urban design issue; however, I note the outcomes will require further engagement to consider how best to minimise impacts on existing landowners and businesses. I note condition 9(b)(i) A and C requires engagement with landowners and occupiers whose access is directly affected and condition 19(a)(vi) requires the CTMP to include methods during construction to maintain access to property, or to provide alternative arrangements for access.

## 11 NoR 3 Takaanini FTN – Weymouth, Alfriston and Great South Road Upgrades

11.1 NoR 3 comprises road and transport upgrades for the Takaanini FTN of approximately 1.7km along Weymouth and Alfriston Roads between Selwyn Road and Saralee Drive and an adjoining 590m length of the Great South Road FTN to the south of the intersection of Great South Road, Weymouth Road and Alfriston Road. This is depicted in Figure 9 below.

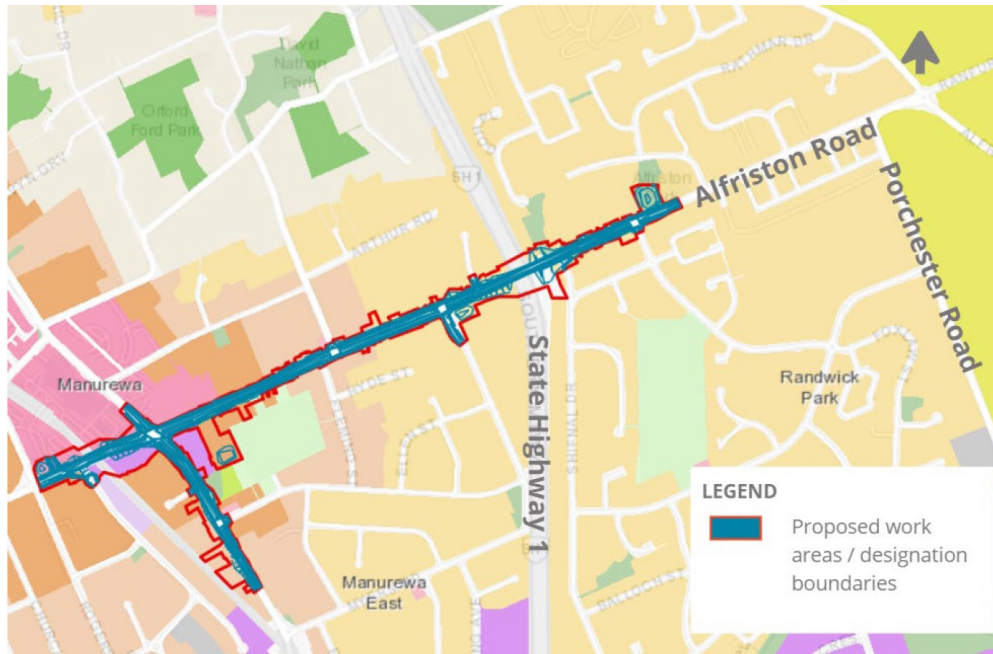


Figure 9: Extent of NoR 3 adjacent to current zoning

- 11.2 NoR 3 enables a four-lane FTN arterial cross section for the Weymouth and Alfriston Road extents and as it applies to Great South Road FTN (refer to Figure 7). On this basis it enables bus lanes in both directions, walking and cycling facilities, upgrades and tie-ins to eight key intersections (as set out in table 3-5 of the AEE) on the length of the route, replacements to the existing Weymouth Road bridge over the NIMT and the Alfriston Road bridge over SH1, and four stormwater treatment wetlands.
- 11.3 The NoR passes through a highly urbanised environment. The current zoning is depicted in Figure 9 and is comprised predominantly of residential uses with a portion of commercial at the western end around Manurewa Town Centre, Southmall and the NIMT. Due to the walkable catchment around Manurewa Town Centre, the train station and public transport interchange, there is proposed to be considerable residential intensification with upzoning of MHU to THAB and MHS to MHU.
- 11.4 The GALP for NoR 3 indicates batters on the approaches to the replacement Weymouth Road and Alfriston Road bridges and considerable land take on both sides of the route within the vicinity of the bridges as part of the construction areas. Beaumonts Way is proposed to be closed as part of these works and the southern access to Southmall will be impacted by this designation. I have some concerns regarding the closure of this street, particularly as there is already evidence of

intensification and that is likely to continue. Closure of the street reduces connectivity and physical permeability around the town centre.

- 11.5 Four stormwater treatment wetlands are proposed – one on Weymouth Road, two on Alfriston Road and one at the eastern end of the NoR at Saralee Drive. The land taken to widen this corridor affects a large number of residential properties. At present little detail is provided on the cut and fill batters. Where these are located adjoining residential properties, it is expected that all solutions should be explored including whether low retaining walls could provide an outcome that requires less land take. I note this is also articulated within the UDE, particularly in relation to the proposed replacement bridges.
- 11.6 The UDE includes NoR 3 within Alfriston Road (section 8 of the UDE), and a small section of Great South Road 2 (section 6 of the UDE). The UDE includes recommendations ensure the detailed design of NoR 3 responds appropriately to the principles and project specific urban design outcomes sought. These include the following:
- A landscape plan that incorporates recommendations from other specialist reports including treatment of embankment/retaining structures and stormwater treatment and visual integration, interface and sense of place considerations for the two proposed bridge structures. The landscape plan should outline an approach that prioritises retention and protection of established mature trees along the edges of parks such as Tadmire Park. Future design stages should consider the accommodation of active mode pathways within land zoned open space such as Gallaher Park and Alfriston Park to enhance the park edges.
  - Integration of existing and proposed stormwater systems to ensure an appropriate interface with adjacent land uses, specifically where wetlands are proposed in areas zoned for high density residential land use.
  - While provision for active modes is a positive outcome, little space is provided for amenity planting and water sensitive design elements that support adaptation to climate change. Future design stages could consider opportunities to support these outcomes on land that may no longer be required post-construction within NoR 3
  - Identification, development and integration of key local community and identity drivers to deliver a positive contribution to sense of belonging, community resilience and local access to amenities. In relation to NoR 3 this includes Manurewa Town Centre and Southmall, Manurewa train station and bus interchange, Manurewa East School and a number of parks. Future design stages need to demonstrate how these can be redeveloped and reintegrated post construction to support local communities.
  - Permeability of the corridors for active modes that addresses cross corridor connectivity (midblock crossings), modal priority and permeable access to destinations such as the Weymouth Road at the entrance into Manurewa train station and near Beaumonts Way, and connections across Alfriston Road to Gallager Park.



- The corridor generally provides diverse transport choices and connectivity between FTN facilities, centres and local amenities, however future design stages need to ensure this enhances connectivity and legibility at the micro and macro scales in particular prioritising active modes at existing and proposed crossing points and at the many intersections along the route.
- An urban integration approach should be developed in future design stages to redefine and integrate land that may no longer be required post construction to support adjacent land use.

11.7 I support inclusion of these recommendations to inform the ULDMP, which is required to be prepared prior to the start of construction for each stage of work. This will ensure the detailed design of the corridor responds appropriately to the principles and project specific urban design outcomes sought.

## **12 NoR 3 Submissions Received:**

12.1 Forty submissions in total were received relating to NoR 3. Only some of these raise a number of issues of relevance to urban design which are set out below under key themes of urban design, amendment to the ULDMP condition and property effects relating to the extent of corridor.

### **Urban Design**

12.2 As mentioned in relation to NoR 1, submissions by Manurewa Business Association Incorporated (NoR 3 - 16) and Southmall Manurewa (NoR 3 - 17) support the intent of the Takaanini FTN to provide improved transport mode connections and services but consider there needs to be better integration with Manurewa Town Centre and Southmall Manurewa for connectivity, accessibility, safety and attractiveness of the area. In the view of these submitters, blocking and bypassing the southern access to Southmall is contradictory to the town centre integration intended by the FTN. The submitters are also concerned with the apparent ambiguity regarding the proposed changes to the Weymouth Road bridge.

12.3 From the GALP it appears NoR 3, which extends from the junction of Weymouth Road and Selwyn Road and along Alfriston Road will have a significant impact on the southern edge and access to Manurewa Town Centre and Southmall as well as reducing its current parking area. Southmall has also expressed concern that the proposed designation will negatively impact its operations due to the loss of carparks. Southmall has included an image of a multi-storey building on the corner of the southern end of the Southmall carpark and Weymouth Road, close to the Weymouth Road bridge over the NIMT.

12.4 A and M Self (NoR 3 – 32) have submitted in relation to potential landscape and visual effects on their properties at Alfriston Road as a consequence of neighbouring properties being required as part of the designation process. They would like to be consulted as part of the design process to ensure appropriate integration with future development and a landscape buffer to maintain visual privacy.

12.5 In the context of NoR 3, the above submitters are key stakeholders and therefore should be identified through condition 9(b)(i)B and therefore invited to input into the development of the ULDMP in accordance with condition 12(d).

#### **Amendment to ULDMP Condition**

12.6 Kāinga Ora (NoR 3- 39) has submitted on all four NoRs. The agency supports the intent of the NoRs to support planned urban growth and enable mode shift to public transport and active modes in South Auckland. However, as discussed elsewhere in this memo, Kāinga Ora has expressed concern that there is a lack of clarity and certainty around the extent of proposed dedicated bus lanes. They are therefore seeking amendments to the ULDMP condition to ensure integration with existing sections of bus lanes on the proposed FTN corridors. I am not convinced that those amendments are required within the ULDMP condition, which is already quite cumbersome. I consider the current wording is sufficient. However, if any further amendment was needed for clarification, it could simply be the addition of “throughout the network” to condition 12 (iii)(f).

#### **Property Effects Relating to Extent of Corridor**

12.7 A number of submitters are concerned with the extent of land proposed to be taken as part of the designation. This is not solely an urban design issue; however, the take of land also affects the built form and public realm outcomes at the edge of the corridor and therefore I am addressing the submissions that raise issues pertinent to urban design here.

12.8 McDonald’s Restaurants NZ Limited (NoR 3 – 15) has submitted in relation to 207 Great South Road, which is at the southern corner of Southmall, at the junction with Weymouth Road. While McDonald’s acknowledges the importance of providing for improved connectivity along Great South Road, NoR 3 applies to the majority of that site and would adversely impact on the ability for the restaurant to continue to operate on site. The submitter is concerned that it is unclear why so much of the site is included within the designation boundary and that the ongoing operation of the existing restaurant should have been considered in the identification of the extent of the corridor.

12.9 The National Trading Company of New Zealand Limited (NoR 3 – 26) has submitted in relation to 185 Great South Road, which comprises New World Southmall. As with McDonald’s the submitter is not opposed in principle to NoR 3 but is concerned at the extent of land take proposed and seeks to ensure the minimum amount of land required for both the operation of the corridor and construction is designated.

12.10 Restaurant Brands Limited (NoR 3 – 27) is the leaseholder of a property at 2 Weymouth Road which is currently occupied by a KFC drive-through restaurant. NoR 3 as proposed indicates loss of existing vehicular access to the site and include proposed construction of a batter over part of the drive-through facility. It will also result in the loss of the signage. Restaurant Brands is opposed to the NoR for the site, given the extent of adverse effect on their ability to continue to operate in this location.

- 12.11 Z Energy Limited (NoR 3 – 38) has submitted on NoRs 1 and 3. The submission relates to Z Manurewa, located on the corner of Alfriston Road and Great South Road, Manurewa. More specifically some 1063m<sup>2</sup> along the full length of both road frontages is included within the proposed designation, which impacts on access to the service station and are likely to require a complete redesign of the site. The submitter seeks that the NoR either be declined or amended to minimise the encroachment into their site.
- 12.12 While there are a number of concerns around the extent of land take, this relates primarily to transport and safety and therefore is beyond my area of expertise. From an urban design perspective, the key issue with all of the above submissions is the impact on the public realm, and particularly edge conditions. In my opinion, the urban design aspects can be adequately addressed in the detail design stage through the ULDMP conditions 12(d), (f) and (g)

### 13 NoR 4 – Takaanini FTN – Porchester Road and Popes Road Upgrades

13.1 NoR 4 enables transport upgrades for the Takaanini FTN route of approximately 3km along Porchester Road between Alfriston and Walters Road; and an adjoining 500m length of Popes Road between Takaanini School Road and Porchester Road, which is a



Figure 10: Extent of NoR 4 adjacent to current zoning

Key Connection. The extent of the NoR is depicted in Figure 10.

13.2 The proposed works enable the urbanisation of both corridors providing for two vehicular traffic lanes, walking and cycling facilities, upgrades and tie-ins to six key intersections along both routes; and stormwater management devices comprising two treatment wetlands on Porchester Road (in the vicinity of Papakura Stream) and treatment swales on Popes Road. A typical cross-section is set out in Figure 11 below.

13.3 The NoR passes through a mixed environment. To the west of Porchester Road, is a

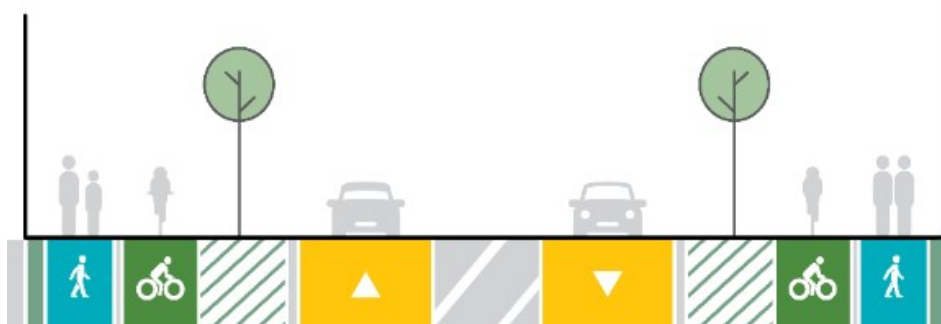


Figure 11: NoR 4 typical two-lane arterial cross-section

mix of suburban residential and commercial/industrial bulk retail and warehousing. To the east the land uses are still predominantly rural in character, with a number of community uses interspersed amongst the rural activities. Walters Road interfaces with Bruce Pulman Park and Addison development. The current zoning is depicted in Figure 10 and reflects the current land use, with a large area of Future Urban zoned land to the east of Porchester Road. The surrounding context is anticipated to change in the future, with upzoning of the existing residentially zoned land. It is unlikely that much of the Future Urban zoned land will be live zoned as there are known flooding and geotechnical issues such that Auckland Council's Future Development Strategy removed part of this from Future Urban.

13.4 The GALP for NoR 4 indicates land take on both sides of Porchester and Popes Roads, particularly along the more rural sections where roads need to be brought up to urban standards.

13.5 The UDE discusses Porchester and Popes Road within section 9 of the UDE. The UDE includes recommendations ensure the detailed design of NoR 4 responds appropriately to the principles and project specific urban design outcomes sought. These include the following:

- A landscape plan that incorporates recommendations from other specialist reports including stormwater treatment and visual integration for the proposed active modes bridge over Papakura Stream, where the corridor intersects with the watercourse.
- Integration of proposed stormwater systems to ensure an appropriate interface with adjacent land uses, specifically where wetlands are proposed in areas zoned for higher density residential land use.
- Identification, development and integration of key local community and identity drivers to deliver a positive contribution to sense of belonging, community resilience and local access to amenities. In relation to NoR 4 this includes Papakura Normal Primary School, and Bruce Pulman Park. Future design stages need to demonstrate how these can be redeveloped and reintegrated post construction to support local communities.
- Permeability of the corridors for active modes that addresses cross corridor connectivity (midblock crossings), modal priority and permeable access to destinations such as the existing crossing points on Porchester and Walters Roads from Papakura Normal Primary School.
- The corridor generally provides diverse transport choices and connectivity between FTN facilities, centres and local amenities, however future design stages need to ensure this enhances connectivity and legibility at the micro and macro scales in particular prioritising active modes at existing and proposed crossing points and at the many intersections along the route.
- An urban integration approach should be developed in future design stages to redefine and integrate land that may no longer be required post construction to support adjacent land use.

13.6 I support inclusion of these recommendations to inform the ULDMP, which is required to be prepared prior to the start of construction for each stage of work. This will ensure the detailed design of the corridor responds appropriately to the principles and project specific urban design outcomes sought.

#### **14 NoR 4 Submissions Received:**

14.1 Twenty-five submissions were received relating to NoR 4. Only some of these raise a number of issues of relevance to urban design which are set out below under key themes of urban design (including amendments to the ULDMP condition) and property effects relating to the extent of corridor.

#### **Urban Design**

14.2 BJ Wallace Trust and SJ Wallace Trust (NoR 4 – 14) own 296 Porchester Road, which is located in the south-western quadrant of the intersection between Porchester and Popes Roads in Takaanini. The property is zoned Light Industry but is relatively undeveloped and contains a former horse training track. Among the concerns expressed by the submitter is the restriction on their ability to implement approved resource consents on the landholding. The submitter seeks that the FTN achieve compliance with the landscape and precinct plans for the Takanini Precinct in the AUP(OP). The Takanini Precinct is set out in 1438 of the AUP(OP), the submitter's site is within sub-precinct A. A landscape plan is included within the precinct provisions to ensure and appropriate interface with connections. NoR 4 is largely consistent with this, but it will need to inform the detailed design of landscape and edge treatment. At this stage, I consider this can be managed through condition 12 ULDMP as it is currently drafted.

14.3 Zabeel Investments Ltd (NoR 4 – 15) owns 354 Porchester Road, that like Wallace Trusts' land is zoned Light Industry. It currently accommodates a Placemakers building materials store, a Mobil service station and a logistics warehouse. The proposed designation encroaches on the Placemakers carpark and Mobil forecourt, including an area where landscaping was required by the Takanini Precinct and approved resource consents.

14.4 Alda Investments Limited (NoR 4- 16) holds a resource consent to develop the sites at 164-166 Porchester Road, zoned Residential – MHU. D E Nakhle Investment Trust (NoR 4 -17) owns the land to which the consent relates. The NoR proposes to take land along both Walters Road and Porchester Road that will affect the ability to construct the consented development, which comprises two four-level apartments containing 42 units in total.

14.5 The above three submitters seek that the ULDMP be utilised as a tool for refinement and implementation of a design which is already of a standard that will achieve quality urban design and landscape outcomes, as opposed to a tool to fix the current concept plan. The submitters seek that the ULDMP condition be amended so that stakeholders not only be invited to participate in the detailed design six months prior to the start of detailed design for “a stage of work” but also to extend this participation throughout the various design phases including the earlier concept design. The submitters also seek

that the ULDMP include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes. In light of the above, I consider amendments should be made to condition 12(a) to ensure that the ULDMP is prepared at least six months prior to the start of construction for a stage of work, which would be more consistent with 12(d) and would enable genuine engagement with stakeholders in the preparation of the ULDMP. I also note that where there are existing resource consents, these form part of the environment and need to be taken into account accordingly to ensure the creation of the FTN and enabling works reinforces rather than stymies the levels of growth anticipated to support it.

- 14.6 Kāinga Ora (NoR 4 - 24) has submitted on all four NoRs. The agency supports the intent of the NoRs to support planned urban growth and enable mode shift to public transport and active modes in South Auckland. However, as discussed elsewhere in this memo, Kāinga Ora has expressed concern that there is a lack of clarity and certainty around the extent of proposed dedicated bus lanes. They are therefore seeking amendments to the ULDMP condition to ensure integration with existing sections of bus lanes on the proposed FTN corridors. Like NoR 2, NoR 4 does not include dedicated bus lanes; the focus being on urbanising the road and providing for active modes, therefore I am not convinced this amendment is relevant. I consider the current wording within condition 12 to be sufficient.

#### **Property Effects Relating to Extent of Corridor**

- 14.7 A number of submitters are concerned with the extent of land proposed to be taken as part of the designation. This is not solely an urban design issue; however, the take of land also affects the built form and public realm outcomes at the edge of the corridor and therefore I am addressing the submissions that raise issues pertinent to urban design here.
- 14.8 Dianne and Neville Smith (NoR 4 – 5) have submitted in relation to 52 Popes Road, which is affected by one of the proposed stormwater devices. Their submission relates in part to an existing drain located along their road frontage. While primarily an engineering issue, from an urban design perspective in urbanising this stretch of road, it would be expected that the design would respond to the safety of pedestrians. This should be adequately addressed through Condition 12(f) and (g).
- 14.9 Continuous Spouting Auckland (NoR 4 – 6) has submitted in relation to their business at the intersection of Popes Road and 94 Takanini School Road and the extent of land take proposed which will affect their business. Mimico Properties Limited (NoR 4 – 20) have similarly submitted in relation to 90 Takanini School Road, where the extent of land take proposed will affect future development plans for the site. Graeme and Anna Goldring (NoR 4 – 7) have submitted on the extent of land take in relation to their property at 160 Manuroa Road, Takaanini and similarly Manpreet Kaur (NoR4 – 25) has submitted in relation to 33 Walters Road, Takaanini.
- 14.10 Mega Food Services Limited (NoR 4 – 13) are the landowners of 495 Porchester Road with approximately 83m of frontage along Porchester Road, their concern is the area of land proposed to be designated is much greater than that required for the proposed road upgrade design. The submitter seeks that the designation boundary be amended

to show operational extent and construction extent as two separate boundaries, which seems sensible.

- 14.11 Ministry of Education (NoR 4 – 22) has submitted on all four NoRs, and broadly supports the aim to plan transport investment in South Auckland. However, it notes that Papakura Normal School is directly affected by the proposed designation along its Porchester and Walters Road frontages, which affects the existing education purpose designation of this land. The Ministry considers the 12-month process to nominate a contact within condition 3 LUIP is unduly long. It is also concerned that condition 12 does not include any requirement to take into account any feedback or input from stakeholders.
- 14.12 It is unclear in some locations why so much land is proposed to be taken, particularly where it is not required for the extent of the transport upgrades, and whether this could be further refined prior to any works commencing, particularly where greater clarity could be provided as to whether the designation is for the operational extent or merely for construction purposes.
- 14.13 I note condition 3 sets out a clear process for land use integration. I support this condition, which will enable landowners to get involved, particularly in relation to edge conditions, crossings and stormwater infrastructure. However, I agree with Ministry that the period of time for identifying and including contact details could be shortened.



## Conclusion and Recommendations

- 14.1 As previously stated in this memo, I support the approach and methodology undertaken in the UDE for these NoRs. While this is relatively high level and conceptual at this stage, in my opinion the UDE has appropriately identified the opportunities and outcomes for each NoR that need to be incorporated as the project develops through the design stages. This will ensure appropriate outcomes for safe and attractive urban environments within each of the NoR extents.
- 14.2 The proposed NoRs present an opportunity to better connect communities throughout south Auckland and to support the extent of intensification envisaged along the Great South Road and Takaanini FTN corridors, in particular within walkable catchments of existing train stations and town centres. Overall, the NoRs are supported as the most appropriate routes from an urban design perspective to safeguard for public transport and active modes. However, I do agree with many of the submitters that further refinements are required to identify the extent of land proposed for widening and/or construction and ongoing operation to ensure that only the land area actually needed is taken.
- 14.3 In my opinion further detail is required for clarity of timeframes and to ensure appropriate edge conditions are provided for along the corridor, including building setbacks, batters, retaining walls and boundary treatments, that will support ongoing use and or development of sites adjoining and the corridor and a safe and attractive environment for residents, commuters, visitors and recreational users of the walking and cycling facilities.
- 14.4 I have reviewed the proposed conditions that will apply to the NoRs and make the following recommendations based on the above (underlined for additions and strikethrough for deletions):

### **Condition 3: Land Use Integration Process**

The Requiring Authority shall set up a Land use Integration Process for the period between confirmation of the designation and the Start of Construction. The purpose of this process is to encourage and facilitate the integration of master planning and land use development activity on land directly affected or adjacent to the designation. To achieve this purpose:

- (a) Within ~~twelve (12)~~ six (6) months of the date on which this designation is included in the AUP, the Requiring Authority shall include the contact details of a nominated contact on the project website (or equivalent information source) required to be established by Condition (2)(a)(iii).

## Condition 12: Urban and Landscape Design Management Plan (ULDMP)

- (a) A ULDMP shall be prepared at least six (6) months prior to the ~~Start of Construction~~ start of detailed design for a Stage of Work.
- (f) To achieve the objective, the ULDMP shall provide details of how the project:
  - (i) is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), community infrastructure, natural environment, landscape character, ~~and~~ open space zones and any adopted master plans for the locality;
- (g) The ULDMP(s) shall include:
  - (iii) landscape and urban design details – that cover the following:
    - f. integration of passenger transport throughout the network;
    - i. interfaces – how the interface and edge treatment with adjoining properties has been treated;

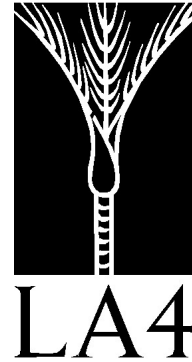
14.5 In his memorandum, Daniel Kinnoch has made a number of recommendations in relation to Condition 12 in relation to parks. I note he recommends a number of additional strategies for inclusion within clause (e) that the ULDMP shall be prepared in general accordance with. I am supportive of these documents being specifically named within Condition 12 (e) as these provide local context and local aspirations. I also support his recommendation for an additional subclause within clause (g)(iii) of that same condition to include reference, within landscape and urban design details, to reinstatement and enhancement of parks and open space.

**Lisa Mein**

MA (Urban Design), BPlan, MNZPI

**Technical Memorandum for Notices of Requirement (NoRs)  
South Frequent Transit Network (SFTN) Project**

To: Cheryl Cleary, Consultant Reporting Planner  
To: Joy LaNauze, Senior Policy Planner, Planning Central/South  
From: Rob Pryor, Consultant Landscape Architect  
LA4 Landscape Architects



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**1. APPLICATION DETAILS**

**Requiring Authority name:** Auckland Transport (**Requiring Authority or 'RA'**)

**2. INTRODUCTION**

**QUALIFICATIONS AND RELEVANT EXPERIENCE**

- 2.1. My full name is Robert James Pryor. I am a registered landscape architect and a Director of LA4 Landscape Architects (**LA4**), a position I have held since 1996. I hold a Bachelor of Science degree in Psychology from Otago University (1980) and a post-graduate Diploma of Landscape Architecture from Lincoln University (1984). I am a registered member of Tuia Pito Ora, New Zealand Institute of Landscape Architects (**NZILA**), a member of the Resource Management Law Association (**RMLA**) and member of the Urban Design Forum (**UDF**).
- 2.2. I have over 36 years' experience undertaking landscape assessments for clients in both the public and private sectors on a wide variety of major projects within a range of landscape settings. I specialise in the preparation of landscape and visual effects assessments and have undertaken numerous assessments. I have been involved in an extensive range of local authority, public and private sector work. As landscape architect for the Wellington City Council, I was responsible for coordinating, designing, and overseeing the implementation of the city's landscape and urban development projects. Since becoming a Director of LA4, I have specialised in landscape assessment and landscape evaluation.
- 2.3. Prior to becoming a director of LA4, I worked for the firm for three years as a Landscape Architect (1993-1996). Prior to that, I was a Director of Bannatyne Pryor Associates in Wellington (1989-1993) and Landscape Architect for Wellington City Council (1984-1989).
- 2.4. I have undertaken technical reviews for a number of NoR and Resource Consent applications including:
- a) AMETI Stages 1, 2, 2A
  - b) Eastern Busway Stage EB2 NoRs
  - c) Eastern Busway Stage EB2 and EB3R Resource Consents
  - d) Airport to Botany Bus Rapid Transit NoRs
  - e) Eastern Busway EB3 Commercial and EB4 Link Road
  - f) Hamilton Southern Links NoRs; and

g) Hamilton Southern Interchange NoR.

2.5. A site visit of the Project areas and investigations of the wider environs was undertaken on 14 September 2023. This Technical Memorandum is my expert technical review of the South Frequent Transit Network NoR and submissions relevant to my area of expertise.

#### **CODE OF CONDUCT**

2.6. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2.7. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

#### **NOTICES OF REQUIREMENT**

2.8. The Applicant as a requiring authority has served Auckland Council with Notices of Requirement (**NoRs**) to provide for road widening to accommodate bus priority measures, walking and cycling facilities, key intersection upgrades, replacement of existing bridges and other associated works (the **Project**).

2.9. I have reviewed the Applicant's NoRs, and the relevant supporting information with reference to the requirements of relevant provisions in the Auckland Unitary Plan (Operative in Part) (**AUP-OP**) and overarching policy set out the National Policy Statement: Urban Development 2020 (**NPS:UD**), to assist the preparation of the Council's reporting planners' reports under s42A of the RMA.

2.10. More specifically, my technical memorandum assesses landscape character and visual amenity considerations and the associated effects on amenity associated with the NoRs, and covers the following matters:

- a) Summary of the Project (Section 3)
- b) Summary of the key landscape issues (Section 4)
- c) Assessment of landscape and visual effects (Section 5)
- d) Proposed mitigation measures (Section 6)
- e) Comment on submissions relevant to landscape and visual amenity considerations (Section 7)
- f) Comment on SGA proposed conditions (Section 8); and
- g) Recommendations (Section 9).

2.11. In preparing this technical memorandum, I have reviewed the following documents relevant to the NoRs application:

- a) South FTN – Assessment of Environmental Effects (**AEE**), 13 October 2023
- b) South FTN – Appendix A, Assessment of Alternatives, 13 October 2023
- c) South FTN – NoRs 1-4 Form 18, 13 October 2023

- d) South FTN – Assessment of Landscape and Visual Effects (**LVA**), 13 October 2023
- e) South FTN – Assessment of Landscape and Visual Effects, Appendix A, 13 October 2023 – Parts 1 and 2
- f) South FTN – Assessment of Arboricultural Effects, 13 October 2023
- g) South FTN – General Arrangement Plan – NoR 1, Final for lodgement, 13 October 2023
- h) South FTN – General Arrangement Plan – NoR 2, Final for lodgement, 13 October 2023
- i) South FTN – General Arrangement Plan – NoR 3, Final for lodgement, 13 October 2023
- j) South FTN – General Arrangement Plan – NoR 4, Final for lodgement, 3 October 2023
- k) Section 92 further information response dated 10 November 2023 (**Section 92 Response**) including its Attachments; and
- l) Submissions received on the NoRs application.

### 3. SUMMARY OF THE PROJECT

- 3.1. The South FTN is one of the transport works packages proposed for South Auckland as part of the Te Tupu Ngātahi Supporting Growth (**Te Tupu Ngātahi**) programme which is a collaboration between Auckland Transport and Waka Kotahi NZ Transport Agency (**Waka Kotahi**).
- 3.2. The South FTN seeks to expand the reach of frequent public transport between Manukau and Drury and complement the rail network; as well as provide safe and attractive active mode facilities. In doing so, the South FTN will alleviate existing transport network deficiencies, increase accessibility, provide transport choice, and encourage mode shift to sustainable transport modes as the population of South Auckland continues to grow.
- 3.3. The South FTN comprises a range of road upgrades including bus priority measures, new and upgraded active mode facilities, and intersection improvements along existing arterial road corridors in South Auckland. In particular, the proposed road upgrades provide for:
  - a) Operation of high-quality FTN bus services along Great South Road between Manukau and Drury (the Great South Road FTN route)
  - b) Operation of high-quality FTN bus services along existing roads between Manurewa, Takaanini, and Papakura (the Takaanini FTN route); and
  - c) Urbanisation of adjoining key connections to FTN routes – Popes Road West, and the Drury section of Great South Road between Waihoehoe Road and State Highway 1 (SH1).
- 3.4. **NoR 1** is for a portion of works required to enable the South FTN – specifically, the operation of the Great South Road FTN route. This includes the construction, operation, and maintenance of upgrades to Great South Road at eight locations between Manukau and Drury, to accommodate bus priority measures, general traffic lanes, walking and cycling facilities, as well as all associated works.
- 3.5. **NoR 2** is for a portion of works required to enable the South FTN – specifically, the construction, operation, and maintenance of upgrades to Great South Road between Waihoehoe Road and SH1 to accommodate general traffic lanes, walking and cycling facilities, as well as all associated works.
- 3.6. **NoR 3** is for a portion of works required to enable the South FTN – specifically, the operation of the Great South Road and Takaanini FTN routes. This includes the construction, operation, and maintenance of upgrades to Weymouth and Alfriston Roads between Selwyn Road and Saralee Drive, and to Great South Road between Halver Road and Myers Road, to accommodate bus

priority measures, general traffic lanes, walking and cycling facilities, as well as all associated works.

3.7. **NoR 4** is for a portion of works required to enable the South FTN – specifically, the operation of the Takaanini FTN route and urbanisation of Popes Road West. This includes the construction, operation, and maintenance of upgrades to Porchester Road between Alfriston Road and Walters Road; and to Popes Road between Takanini School Road and east of Porchester Road to accommodate general traffic lanes, walking and cycling facilities, as well as all associated works.

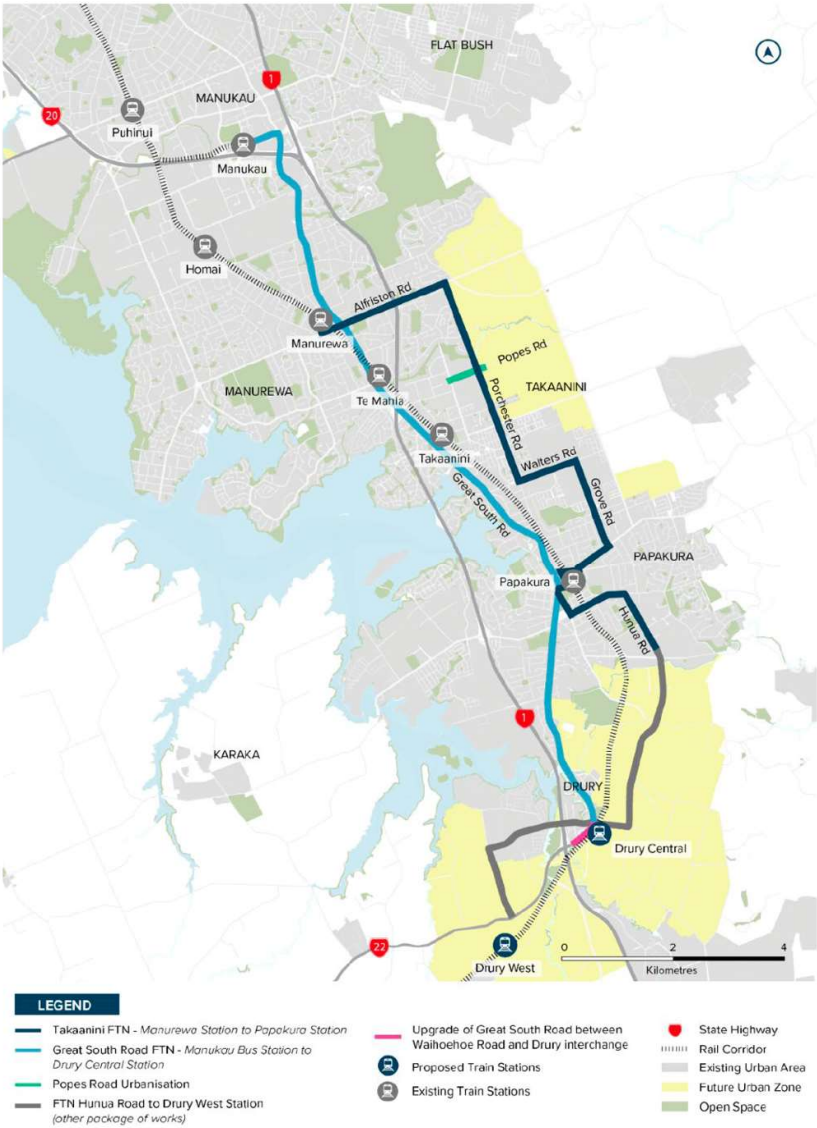


Figure 1: South FTN – overall Project extent



Figure 2: South FTN – proposed NoRs

#### 4. SUMMARY OF KEY LANDSCAPE ISSUES

4.1. There are a number of potential key landscape character, natural character and visual amenity issues in relation to the Project as outlined below. These are addressed under Section 5.

Notice of Requirement	Key issues  LC – landscape character, VA – visual amenity, NC – natural character
<p><b>NoR 1</b> South FTN: Great South Road FTN Upgrade</p>	<ol style="list-style-type: none"> <li>1. Effects on public open spaces / reserves (access restriction and vegetation removal) <ul style="list-style-type: none"> <li>- Anderson Park (LC, VA)</li> <li>- Central Park Reserve and Central Park Cenotaph (LC, VA)</li> <li>- Chisolm Corner (LC, VA)</li> <li>- Otūwairoa / Slippery Creek Reserve (LC, VA, NC)</li> </ul> </li> <li>2. Tree removal (LC, VA)</li> <li>3. Bridge construction – Otūwairoa (LC, VA, NC)</li> <li>4. Visual amenity from adjoining properties and open spaces (VA)</li> </ol>
<p><b>NoR 2</b> South FTN: Great South Road (Drury Section)</p>	<ol style="list-style-type: none"> <li>1. Bridge construction – Hingaia Stream (LC, VA, NC)</li> </ol>
<p><b>NoR 3</b> South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades</p>	<ol style="list-style-type: none"> <li>1. Removal of dwellings</li> <li>2. Removal of buildings and structures</li> <li>3. Effects on public open spaces / reserves (access restriction and vegetation removal) <ul style="list-style-type: none"> <li>- Tadmore Park (LC, VA)</li> <li>- Gallaher Park (LC, VA)</li> <li>- Informal recreation reserve, east of SH1 (LC, VA)</li> <li>- Alfriston Park (LC, VA)</li> </ul> </li> <li>4. Tree removal (LC, VA)</li> <li>5. Bridge construction – NIMT (LC, VA)</li> <li>6. Bridge construction – SH1 (LC, VA)</li> <li>7. Visual amenity from adjoining properties and open spaces (VA)</li> </ol>
<p><b>NoR 4</b> South FTN: Takaanini FTN – Porchester and Popes Road</p>	<ol style="list-style-type: none"> <li>1. Effects on public open spaces / reserves (access restriction and vegetation removal) <ul style="list-style-type: none"> <li>- Porchester Road / Airfields Road (LC, VA)</li> <li>- Walters Road / Arion Road (LC, VA)</li> </ul> </li> <li>2. Visual amenity from adjoining properties and open spaces (VA)</li> </ol>



## 5. ASSESSMENT OF LANDSCAPE AND VISUAL EFFECTS

### Applicant Assessment of Landscape and Visual Effects – Project-wide Assessment

#### Positive effects

- 5.1. The applicant's assessment states that there are a number of positive effects for the overall Project (Section 4.1):

*As previously outlined, the FTN Project includes the provision of new transport infrastructure within the existing and emerging urban environment between Manukau (north) and Drury (south) across four NoRs. This new infrastructure has the potential to provide positive landscape effects through design which could include integration into the surrounding environment and its urban patterns, enhanced landscape and streetscape amenity, and landscape mitigation measures and safety improvements.*

#### Adverse construction effects

- 5.2. The LVA states that there are a number of adverse construction effects for the overall Project<sup>1</sup>:

*The construction phase of the overall FTN Project will cause disruption and will result in a change to the existing landscape character in this existing urban environment. The respective NoRs involve the upgrade and improvements to existing roads and the configuration of the various elements within the existing road reserve.*

*In order to make these improvements the designation boundary in some instances will need to either protrude into or include entire adjacent properties. As such, there are a number of properties directly affected by the construction works across each NoR. This will change the underlying existing land use to an active construction site and / or will have their driveway access, fences or boundary vegetation affected due to the widening of the road.*

#### Adverse construction effects on landscape character

- 5.3. In terms of adverse construction effects on landscape character the LVA outlines the following.
- 5.4. A number of **public open spaces and reserves** will be affected during the construction phase including:
- a) Anderson Park on Great South Road (NoR 1)
  - b) Central Park Reserve and the Central Park Cenotaph on Great South Road, (NoR 1)
  - c) Chisholm Corner on Great South Road (NoR 1) which is contiguous with the Papakura cemetery
  - d) Slippery Creek Reserve on Great South Road (NoR 1)
  - e) Karaka Reserve on Great South Road (NoR 2)
  - f) Tadmor Park on Great South Road (NoR 3)
  - g) Gallaher Park on Alfriston Road (NoR 3)
  - h) An informal (unnamed) recreation reserve, located on Alfriston Road east of SH1 (NoR 3)
  - i) Alfriston Park on Alfriston Road (NoR 3); and
  - j) An unnamed reserve on the corner of Porchester and Airfield Road (NoR 4).

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<sup>1</sup> Section 4.2.1

The LVA notes that although there will be a disruption to these open spaces, on balance they will still be accessible and usable as public assets and amenities for the community.

- 5.5. Construction effects on **natural character** will occur with the proposed works required for the implementation of the bridges across the Otūwairoa and Hingaia Streams within NoRs 1 and 2, which will affect the streams and their margins. The construction phases will require works in these areas which will affect their natural character. These streams have varied levels of natural character due to their vegetation cover and landforms within the catchments set within either semi-rural (NoR 1) or industrial (NoR 2) landscapes. Specific assessment of each bridge and the works required related to each stream is outlined in the NoR 1 and NoR 2 assessments below.
- 5.6. In terms of effects on **vegetation removal**, across the wider Project area, a number of notable or protected trees under the AUP:OP are located within the proposed designation boundary. Within this urban environment, the locations of the NoRs and designations are largely devoid of notable or established trees and there is a low proportion of vegetation coverage. Therefore, the removal of trees through the construction phase could reduce the landscape amenity of the area and result in adverse effects on landscape character before replacement or mitigation planting can be undertaken.
- 5.7. In relation to **earthworks and landform modification** required across the Project, the LVA states that this is largely restricted to locations proximate to the existing road reserves due to (in most instances) the limited variation in the existing topography along the respective corridors. As such, any earthworks proposed will have a limited footprint and does not present significant landform modification which is of an inappropriate scale in this landscape. This also limits the size and scale of the proposed designation boundary. Where there are areas with greater cut and fill modification such as within the NoR 3 corridor and where the Project crosses the Otūwairoa (Slippery Creek) (NoR 1), and the Hingaia Stream (NoR 2).
- 5.8. In relation to potential effects on landscape character for the Project overall, the LVA states that although there will be a change to the existing character and land use, the construction phase is a necessary part of the process required in order to provide the improvement of the transport network across this wider landscape to support anticipated urban growth. Potential adverse effects on landscape character resulting from the construction works are assessed to be **moderate**, overall.

***Adverse construction effects on visual amenity***

- 5.9. The LVA notes that the works required across the four NoRs will have a high viewing audience due to the location of the designations within an existing urban environment and along existing road corridors. The visual audience however is largely restricted to locations near the subject NoRs and will include:
  - a) People moving along these respective streets (or those adjacent)
  - b) More 'static' views from residents or people working or visiting the commercial properties and centres near the respective designations; and
  - c) Users of public open spaces.

From a wider context, the LVA notes that there will only be very limited visibility of the NoR and therefore the construction works. Where visible from the wider context, it will be seen as part of the existing and emerging urban environment and would have **very low** adverse visual effects.

- 5.10. The construction works and machinery will be most visible from the properties which are to remain adjacent to the designation boundary. The LVA notes that it is from these locations where the greatest potential adverse effects could occur given their proximity and potential outlook to the Project area.
- 5.11. Although visible, the construction works will be temporary and present activities which are not common (although not unanticipated), changing the outlook from the aforementioned locations. There will be greater adverse effects on localised areas and some parties will be more affected than others given the works required. However, the designation and therefore construction area will be contained by hoardings (through a mitigation measure) which will screen views of lower-level construction activity and machinery. Some taller elements such as cranes used for the construction of bridges will be visible above the hoardings, and in many instances seen from a distance given the extent of the respective designations.
- 5.12. The LVA concludes that although a large visual catchment and high (predominantly localised) viewing audience is associated with each NoR, across the Project as a whole, any adverse effects on visual amenity resulting from the construction phase is assessed to be **moderate**.

#### **Adverse operational effects**

- 5.13. The LVA assumes that at the time of operation for the FTN Projects, the existing land uses will remain the same (as per the AUP:OP) and urban intensification will have been enabled through provisions related to the MDRS and PC78. The LVA considers that the urban environment will have changed with a greater scale and density of built form and development enabled and, in some cases, likely implemented. The assessment also assumes that the recommendations and mitigation measures have been implemented which will minimise effects on landscape character and visual amenity.

#### ***Adverse operational effects on landscape character***

- 5.14. The LVA states that while there is potential for the removal of established and some notable trees, and disruption to open spaces across the Project-wide area, these matters can be addressed through mitigation measures which include avoiding tree removal where possible, providing a landscape and planting response, and the reinstatement of the open space functions.
- 5.15. Following the construction of the proposed bridges across the Otūwairoa and Hingaia Streams within NoRs 1 and 2, the LVA notes that there is an opportunity to enhance the natural character of these stream margins through integrated landforms and enhancement planting along the stream margins. The proposed retaining walls do not extend down to the stream edge and provide the opportunity for this landscape and natural character enhancement.
- 5.16. The LVA concludes that any adverse effects on landscape character for the Project overall are assessed to be **low**, especially once the areas outside of the constructed lineal road corridors (e.g. the balance of the designation extent) has been reinstated to their underlying zone and land use, and mitigation measures have been implemented. The LVA states that there will also be positive effects resulting from the upgrade of the streetscape environment.

#### ***Adverse operational effects on visual amenity***

- 5.17. In terms of operational effects on visual amenity, the LVA concludes that adverse effects across the FTN Project-wide area are assessed to be **low** due to the designations providing upgrades

and additional roading elements along established street corridors within an existing and emerging urban environment.

- 5.18. The LVA considers that the proposal provides functional and visual improvements (through the road arrangement and cross sections) to an existing street corridor within an urban environment and that although a change, this activity is not uncommon and is anticipated within this environment. While there will be the potential loss of established trees, it is stated that these will have been mitigated through the measures outlined within the Urban and Landscape Design Management Plan (**ULDMP**). The LVA states that there will be positive effects related to the provision of mode share and enhanced streetscape amenity through the planting and street trees proposed within the road reserve.

#### **Applicant Assessment of Landscape and Visual Effects – NoR level Assessment**

- 5.19. The LVA then assesses the individual NoRs landscape and visual effects.

#### **NoR 1 – Great South Road FTN Upgrade**

##### **Positive effects**

- 5.20. The applicant's assessment states that the Project presents upgrades to existing road corridors in NoR 1 which will increase streetscape amenity and improve connectivity throughout the area as outlined for the overall Project.

##### ***Adverse construction effects on landscape character***

- 5.21. The applicant's assessment states that there are a number of adverse construction effects for NoR 1. In relation to open spaces / reserves, four public open spaces are affected by the proposed designation boundary being:
- a) Anderson Park (Great South Road);
  - b) Central Park Reserve and the Central Park Cenotaph (Great South Road);
  - c) Chisholm Corner (Great South Road which is contiguous with the Papakura cemetery); and
  - d) Otūwairoa / Slippery Creek Reserve (Great South Road).
- 5.22. I have read the Technical Memo of Mr Daniel Kinnoch, Council's consultant Parks Planner, who addresses parks planning matters in relation to the effects of the NoR's on the public open spaces. I defer to his recommendations in this regard.
- 5.23. While access will still be available to these areas from the surrounding streets (other than from Great South Road due to the construction activities) the proposed works may result in the removal of a number of established trees within these open spaces. Although not all identified as notable or protected trees by Auckland Council under the AUP, these trees provide enhancement to the landscape amenity and appreciation of the local area.
- 5.24. The LVA states that although the proposed designation boundary includes the locations of some of these trees, the current indicative design avoids their removal. It recommends that as a preventative matter, any works associated with the upgrade of the road should be undertaken using arborist best practice to minimise effects because their removal would result in adverse effects on landscape character.
- 5.25. At Otūwairoa / Slippery Creek, the existing bridge is to be replaced to enable the proposed road configuration. The extent of works within this designation extends down the slopes toward the stream and along the road alignment to enable the new bridge. This will require earthworks and

modification of the landform at this location adjacent to the stream and will result in temporary effects on landscape character. A new bridge across the creek is proposed to be approximately 3m higher than the existing bridge which will be considerably larger than the existing environment. It is noted that this will change the character of the area through the introduction of the bridge itself, earthworks, land formation required and retaining walls.

- 5.26. Overall, the LVA assesses the potential adverse effects on landscape character for NoR 1 will be **moderate**.

***Adverse construction effects on visual amenity***

- 5.27. The adverse visual amenity effects specific to NoR 1 are assessed to be **low – moderate** during the construction phase. This is largely due to:

- a) the specific and localised nature of the designations
- b) the potential removal of established trees; and
- c) the visibility and nature of earthworks and construction required at Otūwairoa / Slippery Creek

- 5.28. The assessment notes that construction works and machinery will be visible from the adjacent properties including public open spaces. Although visible and changing their outlook, the construction works are stated as being temporary as required to provide an upgrade to the road network. Potential adverse effects are stated as being reduced through the provision of hoardings which will provide mitigation and screen views of lower-level construction activity and machinery, however taller elements such as cranes used for the construction of the bridge will be visible above the hoarding.

***Adverse operational effects on landscape character***

- 5.29. The LVA concludes that the adverse operational effects on the landscape character of NoR 1 will have low adverse effects. This is especially once the areas outside of the constructed lineal road corridors (e.g. the balance of the designation boundary) has been reinstated to their underlying zone and land use, and mitigation measures have been implemented.

- 5.30. Any potential effects on notable trees are stated as being addressed through appropriate mitigation measures as outlined within the TMP and Arboricultural Assessment report. Any open spaces affected will also be reinstated. Following construction, although modified with a new bridge and retaining walls the stream margins proximate to the bridge across the Otūwairoa stream are stated as being enhanced through appropriate planting measures which provide the opportunity to enhance the natural character values of the area.

***Adverse operational effects on visual amenity***

- 5.31. In relation to visual amenity, the LVA notes that the designations provide an upgrade to existing road corridors and will not be seen to be out of context, albeit through road widening to enable the movement of vehicles, buses and active modes. Any vegetation which was removed along the road edge (including within provide property) during the construction phase will be replaced 'like for like' which is outlined within conditions and the ULDMP.
- 5.32. The new bridge across the Otūwairoa stream will present a new structure at a greater scale than existing, however it will visually integrate into the surrounding urban context, which is anticipated to intensify under the AUP:OP provisions. Planting is proposed to the fill batters and

along the stream margin, and as such any potential adverse effects on visual amenity are assessed to be **low**.

#### **NoR 2 – Great South Road FTN Upgrade (Drury section)**

##### ***Adverse construction effects on landscape character***

- 5.33. At Hingaia Stream, the existing bridge is to be replaced. This will require earthworks and modification of the landform at this location adjacent to the stream and will result in temporary effects on landscape character. A new bridge across the creek is proposed to be approximately 4m higher than the existing bridge which will be considerably larger than the existing environment. It is noted that this will change the character of the area through the introduction of the bridge itself, earthworks, land formation required and retaining walls. It is noted however that the proposal provides the opportunity to enhance this stream margin and open space with opportunities to enhance natural character values.
- 5.34. The LVA concludes that any adverse effects on landscape character are assessed to be temporary and **moderate** in this localised area.

##### ***Adverse construction effects on visual amenity***

- 5.35. The LVA concludes that any adverse visual amenity effects specific to NoR 2 are assessed to be **low-moderate** during the construction phase. This is due to the specific and localised visual catchment of the designation, its limited extent along Great South Road and the visibility and nature of earthworks required for the Hingaia Stream bridge.

##### ***Adverse operational effects on landscape character***

- 5.36. The LVA concludes that the landscape character of NoR 2 during the operational phase will have **low adverse effects** once mitigation measures have been implemented. Following construction, the properties adjacent to and within the designation will return to their former land use, now fronting an upgraded road corridor. Although modified with a new, larger bridge and associated retaining walls, the stream margins proximate to the bridge across the Hingaia stream will be enhanced through appropriate planting measures which provide the opportunity to enhance the natural character values of the area.

##### ***Adverse operational effects on visual amenity***

- 5.37. The LVA concludes that any adverse visual amenity effects specific to NoR 2 are assessed to be low. It states that the new bridge will visually integrate into the surrounding urban context, which is anticipated to intensify under the AUP:OP provisions. Its fill batters will be planted with native vegetation which will visually soften these forms and integrate with the planting proposed along the stream margin.

#### **NoR 3 – Takaanini FTN – Weymouth Road, Alfriston Road and Great South Road Upgrades**

##### ***Adverse construction effects on landscape character***

- 5.38. The LVA states that there are a number of adverse construction effects in relation to open spaces / reserves, four public open spaces are affected by the proposed designation boundary being:
- a) Tadmore Park, located on Great South Road (associated with Gallaher Park)
  - b) Gallaher Park, with two small frontages on Alfriston Road
  - c) An informal recreation reserve, located east of SH1; and

d) Alfriston Park, located on Alfriston Road.

5.39. While access will still be available to these areas, the proposed wetland in Alfriston Park will render a large part of the park unusable. A number of established trees within private properties and the open spaces (particularly Tadmore Park) will potentially require removal. The bridge construction across the NIMT and SH1 will require earthworks and retaining walls which will change the landscape character of the area. The potential adverse effects on landscape character are assessed as **moderate-high**.

***Adverse construction effects on visual amenity***

5.40. The LVA concludes that any adverse visual amenity effects specific to NoR 3 are assessed to be **moderate** during the construction phase. This is due to the removal of buildings and dwellings within the designation boundary, specifically in Great South Road, the commercial part of Manurewa and Alfriston Road. The construction works for the SH1 and NIMT bridges will also be highly visible.

***Adverse operational effects on landscape character***

5.41. The LVA assesses that there will be **low-moderate** adverse effects on landscape character during the operational phase following mitigation. Tree removal will be offset by the inclusion of new trees and the scale of the new bridges will be commensurate with existing roading infrastructure.

***Adverse operational effects on visual amenity***

5.42. Adverse effects on visual amenity are assessed to be **low**. The LVA considers that the designation will provide an upgrade to existing road corridors with an enhanced streetscape environment and will be seen in the context of the anticipated urban growth. The new bridges are assessed as being visually integrated into the surrounding urban context.

**NoR 4 – Takaanini FTN Porchester Road and Popes Road Upgrades**

***Adverse construction effects on landscape character***

5.43. The potential adverse effects on landscape character resulting from the construction works within NoR 4 are assessed to be **low-moderate**. Tree removal has been assessed as changing the character of the area and resulting in adverse effects. Two open spaces are potentially affected by the proposed construction works, on the corner of Porchester Road and Airfields Road, and on the corner of Walters Road and Arion Road. The works in these areas will result in the loss of established trees, notably in Walters Road.

***Adverse construction effects on visual amenity***

5.44. The visual amenity effects for those properties immediately fronting the works are assessed to be **low-moderate**.

***Adverse operational effects on landscape character***

5.45. The LVA considers that the landscape character of NoR 4 is anticipated to change considerably as enabled by the AUP:OP and PC78 provisions allowing for urban intensification and greater density and height within the existing residential zones. Any adverse effects are considered to be **very low** in the emerging urban environment.

## LA4 Assessment of Landscape and Visual Effects

- 5.46. The Project works are largely contained within a highly modified urban environment influenced by Great South Road, Weymouth Road, Alfriston Road, Porchester Road and Popes Road and surrounding roading network. The works are largely contained within the existing road reserve which reduces the sensitivity of the environment to change as proposed by the Project.

### ***Public open spaces and reserves***

- 5.47. A number of public open spaces and reserves will be affected by the works with the designation extending into the reserves along the street edge to enable the works, or by the introduction of permanent infrastructure into the open space, such as stormwater treatment wetlands (refer to 5.4). I concur that while there will be disruption to these open spaces during construction activities, they will still be accessible and useable. Following completion of the construction activities the open spaces should be reinstated accordingly and tree planting undertaken. I note that proposed condition 13 requires the preparation of an Open Space Management Plan (**OSMP**) to minimise adverse effects on the recreation amenity of the open spaces and concur that this is an appropriate condition.
- 5.48. A number of established trees within the reserves will potentially require removal through the construction phase. This should be minimised as far as practicable and I address this below.

### ***Vegetation removal***

- 5.49. The removal of a number of established trees through the construction phase will reduce the landscape amenity of the open space areas and result in adverse effects on landscape character. Vegetation removal should be minimised as far as practicable and replacement or mitigation planting undertaken following construction. I concur with the LVA's recommendation that as a preventative matter, any works associated with the Project should be undertaken using arborist best practice to minimise the adverse effects of established tree removal. I note that proposed condition 27 requires the preparation of a Tree Management Plan (**TMP**) prior to the start of construction for a stage of work to avoid, remedy or mitigate effects of construction activities on trees identified in Schedule 3. I consider this is an appropriate condition to mitigate the effects of tree removal.
- 5.50. I have read the Technical Memo of Mr Leon Saxon, Council's consultant Arborist which addresses the effects of the NoR's on trees. I support his conclusion that the conditions for the ULDMP and TMP are considered suitable measures to manage potential adverse arboricultural effects.
- 5.51. I further concur with the Assessment of Arboricultural Effects which states<sup>2</sup>:

*'Where trees cannot be accommodated and transplantation is not a viable option, replacement planting must be carried out to remediate the effects from the loss of arboricultural value. Mitigation measures are recommended to take an outcomes-based approach that considers overall improvements to landscape systems and processes, natural character, and visual amenity.'*

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<sup>2</sup> Assessment of Arboricultural Effects, Section 4.3



- 5.52. I consider that reference should be made in the TMP to the recommended measures to avoid, remedy or mitigate construction effects on trees outlined in the Assessment of Arboricultural Effects outlined in Section 4.3.

***Landscape character***

- 5.53. In terms of effects on landscape character, I concur that following construction and implementation of the new roading infrastructure and proposed mitigation measures required through the ULDMP the adverse effects will be low-moderate overall. Upgrading of the streetscape environment and implementation of street tree plantings will potentially enhance the landscape character of the surrounding environment.
- 5.54. I consider that the removal of established trees could be mitigated over time through replacement tree planting and measures outlined within the TMP. The LVA states that while the proposed designation boundaries include the locations and extent of a number of trees, the current indicative design avoids the removal of a number of them.
- 5.55. I concur that the extent of the designations is localised, and the works authorised by the respective designations will not be out of place or incongruous with the established urban character of the area.
- 5.56. The new bridges across Otūwairoa / Slippery Creek (NoR 1) and Hingaia Stream (NoR 2) will introduce considerably larger structures across the streams. I consider that they could be integrated into the landscape setting through design detailing of the bridge structures and retaining walls, and through sensitive landscape treatment of the batter slopes as outlined in the ULDMP proposed conditions 12(h)(c).
- 5.57. The LVA further identifies specific measures to avoid, remedy or mitigate the effects of the bridges as follows<sup>3</sup>:

*‘Ensure the earthworks required to build the bridge over the Hingaia Stream are minimised and where possible to help offset the scale of proposed retaining walls, any landform modification integrates back into the surrounding environment responding to the stream edge. The modified slopes adjacent to the stream should be planted with appropriate species to tie in with the existing vegetation pattern and help visual integration; and*

*The fill batters / bridge abutments are to be planted with native vegetation to provide visual softening and to assist with integrating these forms into the localised environment, providing a contiguous vegetation pattern with that proposed along the stream margin’.*

- 5.58. I concur that these mitigation measures are appropriate and will assist to integrate the bridge structures into the surrounding landscape. I consider that reference to these mitigation measures should be included in the ULDMP conditions.

***Visual amenity***

- 5.59. I concur that the Project will have a high viewing audience due to its location along an existing road corridor within an established urban environment. Close views will be gained from those travelling along the roads and from residential and commercial properties and open space areas adjacent to the designation. From the wider area there will only be limited visibility due to the screening effect of buildings, structures and vegetation within the line of sight.

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<sup>3</sup> Landscape Effects Assessment, Section 5.2.4

- 5.60. There will be temporary adverse visual amenity effects during the construction stage, however these can be mitigated to a degree by measures outlined in the Construction Environmental Management Plan (**CEMP**).
- 5.61. A number of private properties within the designations will be affected by the works through land take, vegetation removal and boundary treatment removal. Reinstatement works will need to be undertaken to minimise adverse effects following construction. The LVA states that mitigation measure should include:
- 'Reinstate driveways, accessways, private fences and garden plantings for existing remaining properties affected by works within the proposed designations. Elements are to be designed to minimise visual amenity effects on residents, and to integrate with the layout and design of outdoor living spaces and in consideration of streetscape character<sup>4</sup>.*
- 5.62. I concur that these are appropriate measures to mitigate effects and consider that reference to this should be included within the ULDM conditions.
- 5.63. I consider that overall, the adverse effects on visual amenity across the FTN Project-wide area will be low following construction and implementation of the proposed mitigation measures. The Project works are in existing road corridors within an established urban environment and will therefore not appear out of place. The works include upgrades to the existing road corridors and will integrate well into the surrounding landscape context as evidenced by similar roading projects throughout Auckland. Street tree plantings implemented along the road corridors will enhance the streetscape character and amenity and contribute towards Auckland's urban ngahere (forest) objectives.
- 5.64. In my opinion, following construction works, the stream margins proximate to the road bridges across the Otūwairoa and Hingaia streams will be enhanced through riparian planting which will enhance the visual amenity values of the area.

**Natural character**

- 5.65. The Project area is not high in natural character values, being a high modified urban environment. There will however be localised effects on the natural character values of the Otūwairoa / Slippery Creek and Hingaia Stream through the earthworks and retaining walls required for the construction of the bridges across the streams. I concur that these areas are not high in existing natural character and the Project provides the opportunity to enhance the natural character values of the stream margins and associated open space through proposed riparian planting as outlined in the ULDM proposed conditions 12 (g)(iii)(c) and 12(h)(c).

**Conclusions**

- 5.66. In my opinion the LVA provided in the lodged NoR has identified and assessed all of the relevant and potential landscape character, natural character and visual amenity effects of the Project.
- 5.67. In the s92 Request for Further Information on the Soft Lodgement documents, I noted that the Project crosses the Otūwairoa / Slippery Creek (NoR 1) and the Hingaia Stream (NoR 2) and that this will have an effect the natural character values of these streams. I requested that an assessment of the Project on the natural character values of the streams should be provided

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<sup>4</sup> Landscape Effects Assessment, Section 4.5.1.4

(LA1). Commentary and assessment related to natural character effects has been added to the lodged LVA and I am satisfied that this has now been addressed.

- 5.68. Subject to the recommendations in Section 10 below, I consider that the recommendations contained within the SGA reports and AEE, and the proposed conditions will avoid, remedy or mitigate the adverse landscape character, natural character and visual amenity effects of the works enabled by the NoRs.

## 6. MITIGATION

- 6.1. The LVA outlines a number of proposed mitigation measures which are to be implemented through an Urban and Landscape Design Management Plan (**ULDMP**). Mitigation measures include:
- i) providing an outcomes-based approach to landscape mitigation that considers overall improvements to this urban landscape (including biophysical systems and processes), and enhances visual amenity
  - ii) an integrated response to the existing and emerging urban patterns and development at the localised scale and across the wider South FTN area
  - iii) managing and limiting the extent of earthworks required
  - iv) vegetation and tree management, and
  - v) the protection of open space and amenity values.

### **Urban and Landscape Design Management Plan (ULDMP)**

- 6.2. Proposed condition 12, outlines the requirement for a comprehensive ULDMP is to be prepared prior to the start of construction for a stage of the work. The objective of the ULDMP is to:
- i) Enable integration of the Project's permanent works into the surrounding landscape and urban context; and
  - ii) Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment.
- 6.3. I consider that the proposed ULDMP condition, for a required management plan will achieve the landscape character and visual amenity effects outcomes. I do however have issues with the timing of the preparation of the ULDMP. Proposed condition (12a) states:

*'A ULDMP shall be prepared prior to the Start of Construction for a Stage of Work.'*

Condition 12(d) states:

*'Key stakeholders identified through Condition 9(b)(i) shall be invited to participate in the development of the ULDMP at least six (6) months prior to the start of detailed design for a Stage of Work.'*

- 6.4. I consider that condition 12(a) needs to be more prescriptive in terms of timing as it is open ended at the moment referring to prior to the start of construction (and well beyond preparation of the detailed design). The ULDMP need to be developed well in advance of the detailed design to meet the objectives of condition 12(b)(i).

6.5. In my opinion the condition should be consistent with condition 12(d) and read:

*'(a) A ULDMP shall be prepared at least six (6) months prior to the ~~Start of Construction~~ start of detailed design for a Stage of Work.'*

6.6. I have read the Technical Memo of Ms Lisa Mein, Council's consultant Urban Designer in relation to urban design matters and concur with her recommendations.

6.7. I also support Mr Kinnoch's recommendation for an additional sub-clause within clause (g)(iii) of the ULDMP to include reference, within landscape and urban design details, to reinstatement and enhancement of parks and open space.

#### **Mana Whenua Engagement**

6.8. Engagement with Mana Whenua is a key component of the Project including input into the ULDMP(s). Mana Whenua are to be invited to participate in the development of the ULDMP(s) to provide input into relevant cultural landscape and design matters including how desired outcomes for management of potential effects on cultural sites, landscapes and values identified and discussed in accordance with the Cultural Advisory Report.

6.9. I consider that engagement with Mana Whenua is a key component to the Project by providing opportunities to enhance cultural values and sites by incorporating cultural recognition.

#### **Construction Specific Mitigation Measures**

6.10. Mitigation measures to be implemented during construction are outlined under Section 4.3. The primary means of mitigating construction effects is through a Construction Environmental Management Plan (**CEMP**) including limiting works areas, minimising earthworks, minimising tree and vegetation removal, installing construction hoardings with interpretive material regarding the project, and minimising construction lighting.

#### **Tree Management Plan (TMP)**

6.11. Proposed condition 27, outlines the requirement for a Tree Management Plan to be prepared prior to the start of construction for a stage of the work. Where trees are unavoidably impacted by the Project and require removal, mitigation measures commensurate with the anticipated effects on the environment must be implemented, with the aim of avoiding, remedying, and mitigating the adverse effects arising from the loss of the trees and associated benefits.

6.12. I consider that the above mitigation measures will avoid, remedy or mitigate potential adverse landscape character and visual amenity effects of the works.

### **7. SUBMISSIONS RELEVANT TO LANDSCAPE AND VISUAL AMENITY CONSIDERATIONS**

7.1. I have reviewed the landscape character and visual amenity submissions in relation to the NoRs. The following submissions are of relevance to the LVA.

7.2.

Landscape Issues	Number of submissions
Compliance with landscape standards	7 (NoR4_14, NoR4_15, NoR4_16, NoR4_17, NoR1_22, NoR1_30, NoR3_38)
Landscape and visual amenity effects of NoRs on property	1 (NoR1_23)
Stakeholder input into ULDMP	2 (NoR4_16, NoR4_17)

#### **Compliance with landscape standards**

- 7.3. A number of submitters are concerned with compliance with landscape standards for existing or consented development becoming non-compliant as a result of the designation (NoR4\_14, NoR4\_15, NoR4\_16, NoR4\_17, NoR1\_22, NoR1\_30, NoR3\_38). For example Restaurant Brands (NoR1\_22) and Z Energy (NoR1\_30) express concern that the proposed land take will remove the 2m wide front yard landscape requirement. Alda Investments (NoR4\_16) and D E Nakhle Investment Trust (NoR4\_17) are concerned at the impact of the designation on their consented four-level apartment buildings at 164-166 Porchester Road.
- 7.4. Zabeel Investments (NoR4\_15) are concerned that if the landscaping requirements of the Takanini Precinct and Precinct Plan cannot be met because of the designation, proposed development will have non-complying activity status under Rule 1438.6.1.8(2). They consider that required landscaping must not be compromised during construction of the designated works.
- 7.5. I concur with these landscape compliance concerns but consider these are planning matters to be addressed accordingly.

#### **Landscape and visual amenity effects of NoRs on property**

- 7.6. Surprisingly, only one submitter (NoR1\_23) expressed concern at the landscape and visual amenity effects on their property, including the clearance of mature vegetation. I consider that the proposed ULDMP condition, for a required management plan will achieve appropriate landscape character and visual amenity effects outcomes to avoid, remedy or mitigate potential adverse landscape character and visual amenity effects of the works.

#### **Stakeholder input into ULDMP**

- 7.7. Several submitters express concern at stakeholder input into the ULDMP. Zabeel Investments (NoR1\_15) note that here is no obligation in the ULDMP condition for stakeholder participation to continue through the detailed design or to participate in earlier designs (e.g. enabling works) which ultimately affect decisions and outcomes in the ULDMP. They also consider that the ULDMP should also include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes.

- 7.8. In a similar vein, Alda Investments (NoR4\_16) and D E Nakhle Investment Trust (NoR4\_17) note that the ULDMP requires stakeholders to be invited to participate in the detailed design 6 months prior to the start of detailed design for 'a stage of work'. There is no obligation for this participation to continue through the detailed design, nor to participate in earlier designs (e.g. enabling works) which they consider ultimately affects decisions and outcomes in the ULDMP.
- 7.9. As outlined below I have a number of concerns in regard to the timing of the ULDMP and concur with the concerns raised in regard to stakeholder participation through to detailed design. I address these below.

## 8. REQUIRING AUTHORITY PROPOSED CONDITIONS

- 8.1. In regard to landscape character and visual amenity matters, the RA's proposed conditions outline the requirement for a comprehensive ULDMP to be prepared prior to the start of construction for a stage of the work. The objective of the ULDMP is to (12(b):
1. *Enable integration of the Project's permanent works into the surrounding landscape and urban context; and*
  2. *Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment.*
- 8.2. I consider that the proposed ULDMP condition, for a required management plan, will achieve the appropriate landscape character and visual amenity effects outcomes. I do however have issues with the timing of the preparation of the ULDMP. Proposed condition (12a) states:
- 'A ULDMP shall be prepared prior to the Start of Construction for a Stage of Work.'*
- 8.3. In my opinion the ULDMP needs to be prepared well in advance of the detailed design stage of the Project to meet the objective of condition 12(b)(i) – *'Enable integration of the Project's permanent works into the surrounding landscape and urban context'*. The ULDMP also needs to be developed well in advance of the detailed design stage to meet the objective of Condition 12(d) which states:
- 'Key stakeholders identified through Condition 9(b)(i) shall be invited to participate in the development of the ULDMP at least six (6) months prior to the start of detailed design for a Stage of Work.'*
- 8.4. In my opinion the condition should be worded for the ULDMP to be prepared early in the design stage of the Project and to be consistent with condition 12(d) and read:
- '(a) A ULDMP shall be prepared at least six (6) months prior to the ~~Start of Construction~~ start of detailed design for a Stage of Work.'*
- 8.5. I also consider concur with Ms Mein's recommendation that an additional clause should be added to Condition 12(g)(iii) to ensure an appropriate interface with adjacent land uses as follows:
- 12 (g) *The ULDMP(s) shall include:*
- (iii) landscape and urban design details – that cover the following:*
- ...

- i. interfaces – how the interface and edge treatment with adjoining properties has been treated.

8.6. I also concur with the concerns expressed by the submitters in regard to ongoing stakeholder participation to continue through to detailed design which they consider ultimately affects decisions and outcomes in the ULDMP and consider that this should be addressed in the conditions.

## 9. RECOMMENDATIONS

### ADEQUACY OF INFORMATION

9.1. The above assessment review is based on the information submitted by the Applicant as part of the applications for Notices of Requirement for the South Frequent Transit Network Project. I consider that the information submitted is sufficiently comprehensive to enable the consideration of natural character, landscape character and visual amenity effects considerations. I consider that:

- a. The level of information provides a reasonable understanding of the nature and scope of the proposed activity as it relates to the AUP-OP.
- b. The extent and scale of any adverse effects on the environment in terms of natural character, landscape character and visual amenity effects are able to be assessed.
- c. Persons who may be adversely affected have been identified.

### NoR's RECOMMENDATIONS

9.2. Having considered the South FTN NoRs and their natural character, landscape and visual effects considerations, and the associated set of conditions, I consider that the NoRs should be recommended confirmed with amended Condition 12(a) and 12(g)(iii)(i).

### AMENDMENTS TO CONDITIONS

9.3. As outlined above, Condition 12(a) should be consistent with condition 12(d) and read:

'A ULDMP shall be prepared prior to the Start of Construction for a Stage of Work at least six (6) months prior to the start of detailed design for a Stage of Work.'

9.4. I also consider concur with Ms Mein's recommendation that an additional clause should be added to Condition 12(g)(iii) to ensure an appropriate interface with adjacent land uses as follows:

12 (g) The ULDMP(s) shall include:

(iii) landscape and urban design details – that cover the following:

...

- i. interfaces – how the interface and edge treatment with adjoining properties has been treated.

Please contact me if you have any questions. I am happy to discuss the above with the author of the LVA to clarify any concerns.



**Rob J Pryor**

Registered Tuia Pito Ora NZILA Landscape Architect

**13 February 2024**





## Technical memorandum for Notices of Requirement for South Frequent Transit Network (FTN): Social Effects

To: Cheryl Cleary, Consultant Reporting Planner, Auckland Council

From: Dr Gillian Stewart, Director, Co-Creationz Ltd on behalf of Auckland Council

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### 1. Introduction

- 1.1. My full name is Gillian Stewart. I am a principal and director of Co-Creationz Ltd. I have been a researcher and consultant in the field of applied social research, evaluation and social assessment for some 20 years, working on a wide range of projects for the non-profit, public and private sectors. I was a Principal Policy Analyst at Manukau City and latterly Auckland Council for 11 years before starting my own consulting company in 2015.
- 1.2. I have a BA from the University of Sussex, UK, a Masters Degree in African politics from the University of Cape Town, South Africa, and a PhD in international development from the University of Bristol, UK. I am a member of the International Association for Impact Assessment, the Environment Institute of Australia and New Zealand, and the New Zealand Association for Impact Assessment. I am currently serving as Secretary for the NZAIA. I have a certificate of training in Social Impact Assessment and an IAP2 certificate in public participation. I also serve as a Board of Trustee for two non-profit community organisations in Auckland and work part-time as the Funding and Impact Lead for Habitat for Humanity Northern Region.
- 1.3. My experience as a Social Impact Assessment practitioner was initiated whilst employed by Auckland Council, providing advice, submissions and evidence to Wiri Prison Board of Inquiry, Drury South Business Project, Waterview, among other council projects and policy-based initiatives. This has been carried through into my consultancy work, having been contracted by a number of private and public agencies to conduct SIA assessments and peer reviews over the past 10 years. I am currently commissioned as the Social Impact and Business Disruption Peer Review Panel member for the City Rail Link, and I am also engaged as a social impact specialist assisting Auckland Council's assessment of the Notices of Requirement (NoRs) for the EB3C and EB4L Eastern Busway project. My consultancy work also involves a wide range of social impact research and evaluation projects for community and non-profit organisations, as well as local government, such as community-led development initiatives, feasibility studies, needs assessments, strategic planning and policy research, analysis and advice in the fields of housing, transport, community economic development, social infrastructure, community enterprise, youth development, urban planning and environmental sustainability. I have specific, long-term experience and local knowledge having worked in the communities of South Auckland since 2004.
- 1.4. I was initially engaged by Auckland Council on 12 October 2023 a day before lodgement for this FTN South NoR project, given a conflict of interest experienced by the pre-existing social impact expert retained by Council. I was then formally contracted to provide social impact assessment services relevant to this project on 31 October 2023.
- 1.5. The South FTN NoR was formally lodged on 13 October 2023 and on 16 October 2023 I was provided with all the relevant project documentation and maps (soft lodgement and lodgement packages), including Council's previous social impact expert's review of the Applicant's soft-lodgement SIA and informal request for further information (dated September 2023). I also had a

conversation with them to understand their specific SIA insights in relation to the project and their review.

- 1.6. I undertook desktop reading and research to gain a full understanding of the project and reviewed the Applicant's draft SIA (dated 8 September 2023) and lodged SIA, Volume 4 South Frequent Transit Network Social Impact Assessment (dated October 2023), alongside all relevant lodged documents. I attended a council project team update meeting on 18 October 2023 in preparation for the s.92 process. Having been engaged late in the process, I conducted my own site visit to the project sites relevant to each NoR on Sat 21<sup>st</sup> November 2023.
- 1.7. I undertook a completeness and adequacy review of the SIA, outlining my request for further information on nine social effects-related issues for Auckland Council (dated 26 October 2023), which Auckland Council submitted to the Applicant on 30 October 2023, in accordance with s92 of the RMA.
- 1.8. On 21 November 2023 the Applicant responded to six of the nine s92 questions and I reviewed the relevant parts of the response to ascertain whether the response fully satisfied the SIA information request in preparation for s.42A reporting. I was unable to attend a council project team update meeting on 29 November 2023 but received an update via email.
- 1.9. The South FTN NoR was notified on 16 November 2023, along with the SIA lodged (dated 13 October 2023). It should be noted that the partial s92 response to my further information requests were not incorporated into the lodged SIA. Please see my commentary in Section 4.10-11 of this report for discussion of these matters.). Submissions closed on 14 December 2023.
- 1.10. Auckland Council provided me with a summary of comments from the relevant Local Boards, and access to these on 22 December 2023, as well as a summary of public submissions and access to these submissions on 13 January 2024.
- 1.11. I have reviewed the Requiring Authority's NoR and the relevant supporting information, including:
  - a. the draft Social Impact Assessment (8 September 2023) and lodged Social Impact Assessment (13 October 2023).
  - b. Assessment of Effects on the Environment
  - c. General Arrangement Plan (for NoR 1-4)
  - d. Assessment of Construction Noise and Vibration Effects
  - e. Assessment of Operational Noise Effects
  - f. Assessment of Transport Effects
  - g. Urban Design Evaluation
  - h. Form 18 (including the proposed designation conditions) for NORs 1 ,2, 3 and 4
  - i. the s 92 response from the Requiring Authority (dated 10 November 2023)
  - j. Local Board views and Council's summary of submissions and full submissions of the relevant public submissions related to South FTN.
- 1.12. This technical report is my expert technical evidence on the South FTN NoRs and submissions relevant to social effects, as my area of expertise.

**1.13. Code of Conduct**

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying

on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason, and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## 2. Scope and Structure

### 2.1. Subject Matter

2.2. This report / memo relates to the social effects of the South FTN Notices of Requirement by Auckland Transport, which consists of:

- South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)
- South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)
- South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)
- South Frequent Transit Network: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)

2.3. The scope of social effects under consideration in this report are those in accordance with recognised industry best practice<sup>1</sup>. This scope has also informed the Requiring Authority's SIA, and include:

- **Way of life** – including:
  - a) How people live, for example, how they get around and access to adequate housing;
  - b) How people work, for example, access to adequate employment;
  - c) How people play, for example, access to recreational activities;
  - d) How people access services and facilities; and
  - e) How people interact with one another on a daily basis.
- **Cultural values and identity** – including shared beliefs, customs, values and stories, and connections to land, places and buildings (note Māori culture and values are considered separately in Cultural Values Assessments (CVA) undertaken by iwi);
- **Community and family impacts** – including its composition, cohesion, character, how it functions and sense of place;
- **Quality of the environment** – including access to and use of ecosystem services; public safety and security; access to and use of the natural and built environment, and its aesthetics value and/or amenity; the quality of the air and water people use; the level of hazard or risk, dust and noise they are exposed to; the adequacy of sanitation; their physical safety; and their access to and control over resources;
- **Decision making systems** – particularly the extent to which people can have a say in decisions that affect their lives, the level of democratisation that is taking place, and the resources provided for this purpose;

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<sup>1</sup> Vanclay, F., Esteves, A.M., Aucamp, I. & Franks, D. 2015 Social Impact Assessment: Guidance for assessing and managing the social impacts of projects. Fargo ND: International Association for Impact Assessment available from [https://www.iaia.org/uploads/pdf/SIA\\_Guidance\\_Document\\_IAIA.pdf](https://www.iaia.org/uploads/pdf/SIA_Guidance_Document_IAIA.pdf)

- **Health and wellbeing** – health is a state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity. It includes psycho-social impacts such as solastalgia (a form of mental or existential distress caused by environmental change);
- **Personal and property rights** – control of property and assets, including whether people experience personal disadvantage or have their civil liberties affected;
- **Fears and aspirations** – perceptions about their safety, their fears about the future of their community, and their aspirations for their future and the future of their children; and
- **Socio-economic impacts** – including standard of living, level of affluence, economic prosperity and resilience, employment, replacement costs of environmental functions and economic dependency.

2.4. This report considers the actual and potential positive and negative social impacts of the Project, in alignment with the s92 Response clarified scope<sup>2</sup> and includes:

- Project planning phase (the period of time before the designation is confirmed. This includes the Notice of Requirement process)
- Designation phase (the period of time from the confirmation of the designation but prior to detailed design, property acquisition and construction, estimated 10-15 yrs).
- Construction phase (the period in which the requirement for the Project is activated and detailed design, property acquisition (noting some early property acquisition initiated by landowners may have already occurred) and construction takes place.
- Operation and Maintenance phase (the period following finishing works, reintegration, reinstatement of designated land and boundaries).

2.5. Given the scope of social impacts and project phases outlined above, and based on the submissions and my professional experience, this report addresses the methodological process conducted by the SIA to identify, evaluate, manage and mitigate the Project’s social effects and the degree to which social impacts on directly and indirectly affected parties have been adequately identified, assessed and their management or mitigation through the proposed Conditions have been adequately addressed. Where gaps, limitations or inadequacies exist, I explain these, providing potential recommendations for the Requiring Authority to address in evidence at the hearing.

2.6. Findings of this report are based on the information available at the time of writing.

2.7. It is acknowledged that at the time the Project is anticipated to proceed, the social environment and receivers directly and indirectly effected will be different, in many ways, to that when the SIA was undertaken. Growth and intensification of residential and business development is likely over the course of the next 10-15yrs. No assessment of social effects can be determined with any degree of accuracy what that future environment, between designation and construction, will look like. Therefore, the social area of influence and the potential social impacts of the construction and operation phases can only be predicted. This has been acknowledged by the Requiring Authority’s SIA. However, establishing conditions to effectively understand this future environment, the affected parties and the social impacts of construction and operation upon them to ensure both positive and negative social effects are managed appropriately, is a key matter for the Requiring Authority to address in evidence at the hearing.

2.8. This report is structured as follows:

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<sup>2</sup> Please see Applicant’s “Attachment A - Social Impact s92 response” (dated Nov 2023).

- Summary of key issues and findings
- Comment on the SGA's assessment of social effects
- Summary and technical assessment of submissions
- Comment on SGA Proposed Conditions
- Recommendations based on this technical analysis.

### **3. Summary of key issues and findings**

3.1. The key social effects issues are common across all NoR's and include the following:

- Way of Life
- Family and Community Impacts
- Health and Wellbeing
- Fears and Aspirations
- Personal and Property Rights
- Quality of the Environment
- Decision Making

3.2. These categories of social effects are integrated and often largely synonymous with each other and often reinforcing, such as perceived impacts on property rights, generate fears and perceptions of loss of autonomy of decision making about future use of their asset and its value, affecting stress and wellbeing and family life, engagement at work or school, and so on. The extent of the effects largely depend on the resources people have around them to cope, manage or resolve the effects where possible, such as friends, money/debt, connection to community support and service providers, knowledge or competence to seek legal advice, access to information, ability to make a case and be heard by people in power. It is for this reason that vulnerable and disadvantaged individuals and groups are most susceptible to the negative effects of development, such as elderly, young people, socio-economically disadvantaged, intellectually and physically impaired. Moreover, the specific social impacts of these effects depend on the life-situations of the individuals, families, organisations, as well as the social and physical environments in which they live, work and play. Impacts on people are also experienced more broadly by and in the community where they live. Effects on families have wider implications for community and society and vice versa. Whilst it is possible to generalise and predict, the actual effects will be extremely hard to calculate in this project.

3.3. Hence, it is necessary to ensure that provision is made to monitor, review and adapt on an ongoing basis throughout all phases of the project and this largely comes down to the levels of understanding, engagement, relationships the project has with and in the community. Conditions that enable good communication and engagement, establish the Requiring Authority as a good neighbour with a strong ethic and practice of social corporate responsibility, and support relationship building and collaborative responsiveness to the short, medium and long-term effects of the project on people and place are evidently needed.

### **4. Comment on the Assessment of Social Effects by Supporting Growth Alliance**

4.1. On the whole, I find the SGA SIA, its methodology, assessment of effects and recommended mitigations to be minimally sufficient. It has done the job of broadly scoping and assessing the potential type and likelihood of social effects of the project's planning, designation, construction and operation phases to draw some approximate assumptions and conclusions.

4.2. A significant methodological challenge faced by the SIA is its apparent initiation late in the piece (July 2023) being given only three months to execute an SIA on such a big and complex project, impacting a scale of people and stakeholders that is quite bewildering. The fact that some 551 property owners and some 747 property titles are directly and indirectly affected through full or

partial acquisition to differing degrees, given the different life situations of the owners and the occupiers, indicates the scale of analysis. It is unsurprising that largely general commentary on effects are, therefore, reflected in the SIA. As such, the SIA has depended to a large degree on desktop research and information generated by the preceding project consultation processes that were not designed with social effects assessment or an SIA methodology in mind. However, I do not feel this has made the SIA deficient in its analysis and assessment, rather that it has not been afforded the insight of personal stories of the fears and anxieties it has discussed at a theoretical level.

- 4.3. Notwithstanding, it is clear that where the SIA has undertaken SIA engagement processes with some key stakeholders the level of analysis of effects and recommendations generated have benefitted. However, some not all stakeholders and specifically affected parties have been identified and some gaps in regards to community facilities, businesses, organisations and community interests and local stakeholders are evident. Although some of these gaps were addressed in SGAs s.92 response to my information requests, I am not sure a comprehensive list of impacted people, groups, businesses, owners and stakeholders has been generated (not to mention a picture of potentially affected residential and business tenants and business employees now and into the future). Importantly, the submission process has brought some of these scoping and stakeholder mapping issues to light, reminding the process of the unique situations of people and organisations and how these will be differently affected by the proposed project. This is one reason for the important role of SIA to prepare and resource those affected to adapt to social change processes and ensure those initiating the change process do so in ways to lessen the adverse and enhance the positive impacts of the process.
- 4.4. It is acknowledged that the SIA is limited by its ability to undertake an accurate assessment of social effects that will occur in a future receiving environment. The receiving environment in terms of local people and place will likely change significantly in the years between designation, construction and operation. It is therefore, integral that the SIA is reviewed over time and an effective means of identifying (newly) affected interests and parties, understanding their situations and assessing the social impacts of the project activities upon them is facilitated in ways that enable them to understand, cope and assist the project to mitigate, as far as practical, the adverse impacts upon them.
- 4.5. I do not think it of value to relitigate or focus on the methodological issues of the SIA. In general, I agree with the scope of matters addressed by the SIA. It's assessment of the positive social impacts of the project are comprehensive and relevant, although I would argue that there are more positive impacts that can be facilitated through the designation and construction phases of the project, specifically as a means to address and provide innovative solutions in the response to mitigate effects that will be adversely felt by some people. Good outcomes can come from responding to and meeting new issues and or challenges generated by the Project.
- 4.6. In general, I also agree with the scope and type of adverse social impacts that have been identified and assessed by the SIA, although I contend there are several gaps (some of which have been implied and acknowledged by the SIA authors in their s.92 response) and therefore no corresponding mitigation condition, as well as recommendations made by the SIA to address key social effects issues but no corresponding mitigation carried through in the conditions. As importantly, I contend that the significance of the effects that have been assessed are underestimated and, therefore, have not been adequately mitigated.
- 4.7. In reviewing the project in light of my knowledge of the communities and neighbourhoods it is located in, it is evident that multiple social impacts are being generated and felt presently at the

planning phase. This is reflected by the content and tone of the submissions, in particular with regards to the inadequacy of the consultation and engagement to date which appears to have been disjointed and has not supported people with enough information and clarity that they need. Left unchecked and unresolved, feelings of distrust, stress, anxiety will have implications for the project, as well as those affected. I do not agree with the SIA that because planning impacts occur before the designation and, therefore, before the conditions are implemented that attention to these social effects are irrelevant to the conditions. I suggest consultation and engagement done well and with purpose to build relationships of trust and participation in decision making is relevant to the conditions.

4.8. The proposed designation phase and the lapse period of a proposed 15yrs (10yrs in NoR2) has a significant negative impact on people’s ability to make decisions, particularly where their property, home or business is directly impacted and immediate concerns regarding their financial situations and futures are triggered. The loss of families, characteristic businesses or facilities to the community identity and way of life, and the removal of buildings are also felt by others, either emotionally or physically through effects to the amenity of the local environment. The scope of impact is personal as well as collective and has the potential to be significant. I do not agree that reliance on the Public Works Act process is sufficient by itself as a condition to adequately support those affected.

4.9. Issues of health and wellbeing are also significant as impacts and I do not feel that enough consideration has been given to addressing and supporting people and those affected by the project. Similarly, I feel there are gaps and inadequacies in the proposed conditions to address the following, and which I have addressed in my recommendations:

- The impacts of the loss of community facilities/ access among community groups and providers and the corresponding community access to these services.
- The management of vacant properties which have the potential to become sites of antisocial behaviour
- Disturbance to neighbours and quality of living environment during demolition and removal of property and buildings
- The loss of local shops and businesses and support for those that may not be able to relocate within the local community
- Changes in community/ town centre character, access and vitality
- The loss of jobs due to business acquisition
- Local homeowners who are impacted are supported to relocate
- Loss of social housing and private rental housing

4.10. With regard to the Requiring Authority’s response to my s.92 further information request, it should be noted that adequate responses were provided to clarify the SIA’s methodological scope (SIA1); engagement and consultation details and feedback (SIA2); how the SIA has informed and been informed by other technical assessment (SIA3); cross-referencing of Appendix E of the SIA to the proposed conditions (SIA4); list of all directly affected and in-proximity community and social infrastructure (SIA7); and consideration of why the Franklin Local Board was not included as part of the social area of influence (SIA8). Amendments, as a result of these further information requests were not updated in the lodged SIA but presented in the amended Appendix E of the lodged ‘Attachment A – Social Impact s92 Response’.

4.11. The further information requests that were not addressed with any comment include SIA5, 6, and 9. These exclusions are relevant to understanding how social effects in the future should be identified and managed at the detailed design stage, ahead of construction. I have included them as i requested them below.

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SIA 5	<p>Please provide further information regarding the role of SIA as the Project phases progress. In particular, please specify the role of SIA in site specific identification, assessment, monitoring and management of social effects, particularly for affected parties and sensitive receivers at the point of an Outline Plan of Works, to ensure the conditioned SCEMP and other Management Plans are able to adequately identify, assess, mitigate and manage the corresponding social effects, including business disruption.</p>	<p>The SIA notes that, given the lapse period between designation and construction and operation the receiving environment may be different from the existing environment. I agree. The community, people, families, businesses and households in proximity to the Project will likely change, and thus social impacts potentially experienced will be different and contingent upon their particular circumstances. It is unrealistic at this stage of the Project to provide a satisfactory assessment of social effects for this future environment. Therefore, it would be most beneficial to ensure that the Conditions provide for a further detailed assessment of social effects alongside finalising detailed designs and preparing an Outline Plan of Works.</p> <p>The proposed Condition 9 says the key stakeholders, community groups, organisations and businesses who will be engaged with will be identified and listed in the Stakeholder Communication and Engagement Plan. What this proposed Condition doesn't comment on is the method for identifying those individuals, groups and organisations and identifying the specific effects of the construction, operation and maintenance phases upon them. As a Condition to manage the effects of the Project, the SCEMP should not replace a process or methodology of adequately identifying affected parties, particularly vulnerable groups such as elderly, tenants in transitional or unsecure housing, children and low-income Pacific and Māori households, and the social effects of the Project construction processes upon them. A mechanism providing for further, site-specific assessment of social effects should be addressed by the SIA and proposed Conditions that specifically informs the SCEMP and other Management Plans of social impacts and mitigation measures required. It is noted in the AEE (p.112) that a Cultural Monitoring Plan is prepared prior to the start of construction works with the objective of identifying methods for undertaking cultural monitoring to assist in the management of any cultural effects during construction works. Please advise why a similar intervention is not considered currently relevant to address gaps in our future understanding of potential social effects.</p>
SIA 6	<p>Please provide a comprehensive list of all directly affected and in-proximity businesses and residential properties that will be impacted by designation and construction phases in each NoR (Project Area level).</p>	<p>Whilst it is acknowledged that following designation, landowners will be consulted with as a priority to establish the property acquisition process under the PWA, their decision making in regards to the Project will have an impact on tenants, whether households or businesses. The SIA has mentioned some general effects on rental supply and effects on business. However, given the lapse period and the need for further detailed design of construction works, it is impractical to provide a comprehensive assessment of specific effects on these households and businesses and the necessary mitigation measures that will likely be required.</p> <p>A review of the SIA finds that only some businesses have been commented on, such as KFC and McDonalds have been mentioned but others are missing from the assessment, such as</p>



		<p>Motels, Hotels and motor lodges for example (in NoR 3). Small businesses are likely local family owned and will not have the resources as would a corporate businesses to manage the cost and impacts of PWA processes, relocation or suffer disruption to their business during construction works.</p> <p>Similarly, notwithstanding the SIA's discussion on property acquisition for home-owners, there is a need for more information regarding rental households and the impacts of the Project upon them. For example, whilst a residential apartment block on Alfriston Rd is commented on there are other accommodation, housing vulnerable tenants (Gallagher Court and Poacher Guest House) which are not identified or mentioned.</p> <p>It is therefore, important firstly, that residential and business tenants are identified and are engaged in coordination with landlords regarding the potential social impact of full or partial acquisition and of construction works residential and business tenants are in close proximity to.</p>
SIA 9	Please provide further information regarding job creation, education and training opportunities during construction	These opportunities are significantly beneficial for NEET and young school leavers in the local areas and should be pursued under a pro-active strategy with local training partners and community stakeholders. However, this is not reflected in the proposed Conditions. Please explain how such an approach should be considered and how this is to be implemented in order to achieve the proposed positive effects.

4.12. It is my opinion, therefore, that the recommendations of the SGA SIA and AEE and the proposed conditions tend to underestimate the significance of the impacts that are and will be felt in the communities where the project will be located, and do not go far enough to avoid, remedy or mitigate the adverse social effects of the works enabled by the NoR. It for this reason that new conditions for a Development Response Management Plan (DRMP), a Property Management Strategy (PMS) have been proposed, as well as other recommendations to the SCEMP, CEMP and Project Information conditions are outlined below in Section 7 of this technical report.

## 5. Submissions

5.1. Council provided me with a summary of submissions by each NoR and I have read each submission that addresses social effects issues. My review and analysis of these submissions note that social effects issues were raised by the vast majority of submitters:

- NoR 1 – 28 of 33 submitters
- NoR 2 – 12 of 16 submitters
- NoR 3 – 36 of 40 submitters
- NoR 4 – 23 of 25 submitters.

5.2. The types of social effects issues raised correspond to the broad range anticipated by the SIA at planning, designation, construction and operation phases. However, it is noted that the majority of submitters tended to be landowners/ property owners (business and residential, as well as public agencies and utility operators), many of whom expressed issues for

themselves personally, as well as their tenants and neighbours. Several submissions came from business owners who were leasing property that is fully or partially affected by the proposed designation and whose business operations would be impacted to varying degrees. There were also a number of submissions from those representing broader community and/or neighbourhood interests (such as Local Board's, Manurewa Business Association, Heritage New Zealand, collectives of residents/ home owners, Auckland Council Parks and Recreation, Kainga Ora, Ministry of Education) who addressed wider community social impacts issues.

- 5.3. This scope of submissions, in my opinion, potentially reflects the focus/ effort of the Project's community consultation and engagement to date, and the reality that the social effects of the designation boundary and proposed construction activities (albeit limited detail of which) impact most significantly on people and organisations whose assets, livelihoods and way of life are immediately affected. The social effects (positive and negative) of construction and operation, such as community cohesiveness, connection, cultural values, amenity, investment on the local communities and neighbourhoods and those who are or will living and working in proximity to the project, given the long-term nature of the Project, are less tangible at this stage, and have not been addressed by submissions to any substantial degree.
- 5.4. The majority of social effects submission points relate to the designation and construction phases of the project, as a result of the impact of the proposed designation boundary on full or partial acquisition of property and proximity to construction activities. The overwhelming majority of submissions that addressed social effects issues were in opposition to the Project and the very small number (6 public and/ or network utility agencies and 4 private submitters) either neutral or in support were made on the basis that they either supported integrated transport outcomes of the Project and/or that the relief sought should be provided for in the Conditions. The Table below quantitatively summarises the points raised across a range of interrelated social effects according to each NoR.

<b>Social effects issues</b>	<b>NoR 1</b>	<b>NoR 2</b>	<b>NoR 3</b>	<b>NoR 4</b>
<b>Way of Life</b> (how people live, work, play, access services and facilities and interact with one another)	3		4	1
Cultural values and Identity (shared beliefs, customs, values and stories, and connections to land, places and buildings)	1			
<b>Community impacts</b> (its composition, cohesion, character, how it functions and sense of place)	5		9	2
<b>Quality of the living environment</b> (access to and use of ecosystem services; public safety and security; access to and use of the natural and built environment, and its aesthetics value and/or amenity; the quality of the air and water people use; the level of hazard or risk, dust and noise they are exposed to; their physical safety; and their access to and control over resources)	7	1	12	7
<b>Decision-making systems</b> (particularly the extent to which people can have a say in decisions that affect their lives)	11	6	8	9
<b>Health and wellbeing</b> (state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity. It includes psycho-social impacts such as solastalgia (a form of	8	2	19	10

mental or existential distress caused by environmental change)				
<b>Personal and property rights</b> (control of property and assets, including whether people experience personal disadvantage or have their civil liberties affected)	13	4	23	11
<b>Fears and aspirations</b> (perceptions about their safety, their fears about the future of their community, and their aspirations for their future and the future of their children)	7	1	13	13
<b>Socio-economic impacts</b> (including standard of living, level of affluence, economic prosperity and resilience, employment, business disruption, replacement costs of environmental functions and economic dependency).	13	5	20	8
<b># of submission points made</b>	68	19	108	60

5.5. Given the number of submissions raising social effects issues, I have sought to analyse and present these under some common themes in general and by NoR where relevant, and where individual submissions raise significant points I have addressed these separately.

#### 5.6. The social effects of the proposed 15yr lapse period

Submitters	Issues in scope
Kāinga Ora Homes and Communities (all NoRs), Z Energy (NoR1:3); Te Tāhuhu o te Mātauranga Ministry of Education (all NoRs), Chander Investment Trust (NoR1:3); Marencia du Plessis (NoR1:15); Davinder Singh (NoR1:20); Restaurant Brands Limited (NoR1:22), Hansaben Patel (NoR1:23), Carter Holt Harvey Property Limited (NoR2:8); Kamal Vasudev Matta (NoR3:4); McDonald's Restaurants NZ Ltd (NoR3:15); Harpartap Singh Kalra and Anjana Kalra (NoR3:19); Tibetan Residential Limited (NoR3: 29); A and M Self (NoR3:32), Kasthuriarachchige Marlon Perera	<ul style="list-style-type: none"> <li>- Some 18 submitters across all NoRs specifically noted the 15yr lapse period as having significant social effects on them personally and or other landowners and the wider community more broadly.</li> <li>- Submitters were personally concerned with the immediate, actual impact of the proposed lapse period on their health and wellbeing; creating uncertainty, anxiety, inability to make decisions about the future of the land and the hopes and aspirations for the future of their families. This is especially heightened by a lack of awareness or understanding about what the lapse period means or allows.</li> <li>- As well as uncertainty, the lapse period is seen as 'blighting land' with significant financial consequences to owners; reducing community safety where properties are left unfinished/ unimproved and/ or unused; inhibiting opportunities for positive local economic development, employment and investment potential and housing supply.</li> <li>- A number of submitters who are homeowners and subject to full or partial land acquisition that affects their way of life, note that the lapse period creates significant emotional and financial anxiety and stress in addition to the social and financial effects of losing their homes. In this planning and designation phase, social effects are being experienced now and will continue to be experienced throughout the lapse period without adequate mitigation and support for them and others who are yet to be identified.</li> <li>- The proposed lapse period of 15yrs is largely considered unsustainable by many submitters – as owners they express</li> </ul>

(NoR3:33); Restaurant Brands Limited (NoR 3,4); Mega Food Services Limited (NoR4:13); BJ Wallace Trust and SJ Wallace Trust (NoR4:14); Zabeel Investments Ltd (NoR4:15).	feelings of being trapped, knowing they cannot sell their property to get out and are living in a home they cannot emotionally and materially invest in and will lose in the future.
Relief sought	Social Effects Categories
<ul style="list-style-type: none"> <li>- Withdraw the NoR.</li> <li>- Reduce the lapse date to 10yrs or preferably 5yrs.</li> <li>- To be bought out now.</li> </ul>	Decision Making Fears and Aspirations Health and wellbeing Personal and Property Rights Socio-economic Impacts

### 5.7. Social effects of full or partial residential property acquisition

Submitters	Issues in scope
Chandler Investment Trust NoR1:3; Dene Worsley Bowmar, Margaret Anne Bowmar, Judith Louise Tompsett (NoR1:5) Fortune Building Management Ltd NoR1:6; Bronwyn Brown (NoR1:11); TRP and B Brown (NoR1:12); Carl Dean Howe (NoR1:16); Davinder Singh (NoR1:20); Hansaben Patel (NoR1:23); Rajnesh Jai Singh (NoR3:1); Mohammed David Thalari (NoR3:5); ChanLong Lim (NoR3:8); Prem Chand and Savita Chand (NoR3:9);	<ul style="list-style-type: none"> <li>- Financial, material and health impacts of homeowners required to relocate.</li> <li>- The submissions of Davinder Singh (NoR1:20), Mohammed David Thalari (NoR3:5); A and M Self (NoR3:32), Kasthuriarachchige Marlon Perera (NoR3:33) for example, should be read and considered in detail as the points made are significant and poignant about the scale and magnitude of the social effects that are currently being experienced and will continue until acquisition occurs. Emotional and financial stress, anxiety and worry, subject to a costly and stressful acquisition and relocation process which may or may not provide any financial benefit as homeowners on the property ladder, wanting to safeguard their financial future and way of life.</li> <li>- Loss of social housing and loss of private rental housing stock, when access and shortage of quality housing is in need.</li> <li>- Loss or curtailment of development potential for intensive housing options in Manurewa through acquisition of land zoned for residential development.</li> <li>- Loss of future financial investment/ capital gain in residential property development where land is acquired. Potential loss of housing development jobs and investment in local area.</li> <li>- Impacts on vulnerable (aged and physically impaired) households – loss of longstanding home and future relocation to a suitable home in same location causes stress, affecting sleep and general health, loss of access to health services, ability to retire. Concern for health and wellbeing, as well as financial security of elderly parents/ residents, unable to engage or understand this project.</li> <li>- Planning and designation process has caused neighbourhood anxiety and concern about the potential loss of neighbours, friendships, family members and social ties.</li> <li>- Fear of financial loss and no compensation.</li> <li>- Stress, time and money expended engaging in process – concern for potential loss of work income attending hearings.</li> </ul>

<p>Awdisho Khamis and 30 signatories (NoR3:10); George Khamis (NoR3:11); Werner Andreas van Schalkwyk (NoR3:12); Umaria (Nor3:18); Kaira (Nor#:19); Nitinkumar Patel (NoR3:22); Mahendra Kumar (Nor3:23); Accessible Properties (NoR3:25); Tibetan Residential Ltd (NoR3:29); A &amp; M Self (NoR3:32); K M Perera (NoR3:33); Suhani Dass (Nor3:35); Alda Investments Ltd Nor4:16</p>	<ul style="list-style-type: none"> <li>- Emotional distress at losing dream home, built and invested in by families.</li> <li>- It should be noted that submitter's Hansaben Patel will experience cumulative negative social effects with three properties impacted (business and residential). Khamis family on Alfriston Road will experience loss of one property and its effects of demolition on their extended family living next door, effectively separating the whanau. The character of the Indian, Pacific and Māori community in Manurewa extends itself to collective living arrangements, where a loss of a property may likely affect intergenerational, extended households with significant social and cultural impacts on childcare, income, educational outcomes.</li> <li>- Fear of losing tenants and rental income.</li> <li>- Significant social effects on vulnerable tenants with physical and intellectual disabilities at 59-59c Alfriston Road, that has not been identified and assessed properly. Submitter concerned at uncertainty and potential loss of one of its properties.</li> <li>- For residential properties affected by partial acquisition, submitters have expressed: <ul style="list-style-type: none"> <li>- Los of use and enjoyment of gardens, green space, trees and yard space for animals, children, recreation, play and parking.</li> <li>- Reduced visual amenity and access.</li> <li>- Reduced privacy and perceived lack of safety from traffic/ road and passersby.</li> <li>- Reduced curb-side appeal, property values, inability to sell.</li> </ul> </li> <li>- Stress and anxiety, confusion lack of understanding about impacts on property, its characteristics, and tenants.</li> <li>- Fear of losing tenants and rental income.</li> <li>- Uncertainty regarding acquisition/ lease opportunities or process.</li> <li>- Dissatisfaction with property being halved by designation causing devaluation and home split in two.</li> <li>- Kainga Ora notes 12 properties subject to full acquisition and 27 subject to partial acquisition, with substantial impacts on loss of housing for tenants living in Manurewa and resulting relocation and family disruption issues affecting jobs, employment, schooling, connection with the community and social ties, etc if suitable accommodation locally cannot be found.</li> </ul>
<p>Manurewa Local Board comments</p>	<ul style="list-style-type: none"> <li>- request that local homeowners who are impacted are supported to relocate</li> </ul>
<p>Relief sought</p>	<p>Social Effects Categories</p>
<ul style="list-style-type: none"> <li>- NoR withdrawn or conditions that minimise intrusions upon submitters land and/or excludes land from designation.</li> <li>- Need for supportive/ constructive engagement with Auckland Transport regarding specific support for vulnerable and significantly affected families who will be subject to PWA and need clear timeframes and certainty to make decisions and be supported and adequately informed and compensated.</li> <li>- Conditions that require the Requiring Authority to</li> </ul>	<ul style="list-style-type: none"> <li>Way of Life</li> <li>Family and Community Impacts</li> <li>Health and Wellbeing</li> <li>Fears and Aspirations</li> <li>Personal and Property Rights</li> <li>Decision Making</li> <li>Socio-economic Impacts</li> </ul>

<ul style="list-style-type: none"> <li>- provide approval to allow consented construction.</li> <li>- Early acquisition and/ or compensation until acquisition for financial loss.</li> <li>- Reduced boundary to exclude full or partial acquisition of land.</li> <li>- Some submitters with large potential portions being acquired wish for entire property to be purchased at market price.</li> <li>- Compensation for loss and costs of relocation.</li> <li>- Support and information through PWA process.</li> </ul>	
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**5.8. Social effects of full or partial business property acquisition**

Submitters	Issues in scope
Restaurant Brands Ltd (NoR1:22); Hansaben Patel (NoR1:23); Z Energy Ltd (NoR 1,3); Manurewa Business Association (NoR1, 3); Southmall Manurewa (NoR 1,3)	<ul style="list-style-type: none"> <li>- Business disruption, closure and loss of jobs and livelihoods.</li> <li>- Financial, material and resource impacts on businesses needing to relocate.</li> <li>- Loss of services and facilities, such as shops, childcare facilities for local community.</li> <li>- Negative financial impacts (losses) on landowners and loss of business tenants.</li> <li>- Financial costs of site redevelopment where partial acquisition affects sites jeopardising viability and feasibility of business operations, requiring business relocation.</li> <li>- Causing anxiety and distress.</li> </ul>
Blue Snow Ltd (NoR2:3); Andromeda Miers Trust Partnership (NoR2:5); Active Electrical Suppliers (NoR2:6); Carter Holt Harvey property Ltd (NoR2:8); Drury Tires (NoR2:15); FirthStreet Ltd (NoR2:16)	<ul style="list-style-type: none"> <li>- Uncertainty that goes with lack of information Restaurant Brands Ltd is leaseholder of 86-99 Great South Road (KFC) uncertainty and it is unclear whether/ how much of the submitters land is actually required for the designation.</li> <li>- Z Service stations (NoR1 and NoR3)) loss of land with impacts on safe operation and site redevelopment costs which may make the business unsafe and unviable as this is a leased site.</li> <li>- NoR sees some significant business disruption on the majority of key businesses in the location. Local, family-owned businesses and landowners seek remediation from impacts of designation boundary on them, in preference to unused and undeveloped land owned by Carter Holt Harvey. Impacts of full or partial acquisition on 1 Firth St and 257, 263,267, 271, 275 Great South Rd, Drury all have business disruption, trade, loss of car parking, access for suppliers and customers, and are concerned with closure or negative impact on business and the flow on to a significant amount of locally employed families. Proposed mitigation impacts 280 Great South Rd, affecting efficient use of a land resource that has local economic development potential. Potential loss of economic investment and employment.</li> </ul>
Mayvan Holdings Ltd (NoR3:6); McDonald's Restaurants NZ (NoR3:15); Manurewa Business Association (NoR3:16); Southmall (NoR3:17); Mahendra Kumar (NoR3:23); National	<ul style="list-style-type: none"> <li>- Business landlords concerned for viability of business tenants and business owners.</li> <li>- Closure of key businesses with significant numbers of staff, such as McDonalds with 101 employees will have economic and social impact on local community. Concerns that business relocation will</li> </ul>

Trading Company NZ (NoR3:26); Restaurant Brands Ltd (NoR3:27); NZ Fire and Emergency (NoR3:28); TCK Wong Doo Trust (NoR3:30); Z Energy (NoRs 1,3); Nilkunt Trustee Company (NoR3:40); Dianne and Neville Smith (NoR4:5); Zabeel Investments Ltd (NoR4:15); Alda Investments Ltd (NoR4:16).	<p>be cost-prohibitive. Loss of established community facility, changing the character of local community.</p> <ul style="list-style-type: none"> <li>- Socio-economic effects on home-based, lifestyle businesses, where loss of land impacts family livelihood from growing fruit and vegetables (NoR3:23).</li> <li>- Significant loss of carparking and access issues for Southmall, Manurewa, affecting character of this part of town centre and vitality of the main street, local access and patronage of Southmall and main street shops, leading to business disruption. These impacts have not been assessed.</li> <li>- Submitters also point to impacts on the business of Childcare facility at 120 Alfriston Rd, affected by partial land acquisition which potentially contravenes licencing requirements to operate safely and in compliance with legislation. Impacts on ability to operate causing loss of revenue, business closure and loss of child care facilities for local community. This designation also impacts on property value and tenancy income for property owners.</li> </ul>
Relief sought	Social Effects Categories
<ul style="list-style-type: none"> <li>- Seek the proposed designation boundary be redrawn to existing property boundaries.</li> <li>- Change designation boundary to utilise vacant land and construction activities diverted to South of Gt South Road (NoR2)</li> <li>- Consultation and engagement, further information regarding impacts and effects, particularly participation in detailed design stages and outlining of clear engagement processes. Amendments to SCEMP/ ULDMO and other management plans for independent resolution process.</li> <li>- SCEMP.</li> <li>- Amending proposed Condition 8 (Management Plans) to require that the summary of comments received (required by 8(a)(iv) demonstrates how, as far as practicable, the feedback from stakeholders has been incorporated.</li> <li>- Condition 9 (SCEMP) should be amended to include the requirement to prepare a schedule of sites affected and site-specific matters identified in the schedule to be addressed through consultation (refer to the Joint Witness Statement (Planning-Conditions) dated 20 September 2023 submitted to the Hearing Panel for the NW NoRs.</li> </ul>	Fears and Aspirations Personal and Property Rights Decision Making Socio-economic Impacts Community character/ way of life.

**5.9. Existing consented plans for development of business and residential housing developments impacted by scope, lapse period and uncertainty of the designation**

Submitters	Issues in scope
Chandler Investment Trust NoR1:3; Fortune	<ul style="list-style-type: none"> <li>- Negative financial impacts (losses) on owners, including costs of planning and consenting, purchase of land for development and loss of future income potential.</li> </ul>

Building Management Ltd NoR1:6; Hansaben Patel NoR1:23; Esskay Holdings Ltd NoR1:25; Southmall NoR1:33); A and M Self (NoR3:32); Alda Investments Ltd Nor4:16	<ul style="list-style-type: none"> <li>- Causing anxiety and distress.</li> <li>- Inhibiting positive local economic development, employment and investment potential/ opportunities arising from development and operation.</li> <li>- Inhibitive of reducing local housing supply shortages.</li> </ul>
Relief sought	Social Effects Categories
<ul style="list-style-type: none"> <li>- NoR withdrawn or conditions that minimise intrusions upon submitters land and excludes land from designation.</li> <li>- Conditions that require the Requiring Authority to provide approval to allow consented construction.</li> <li>- Early acquisition and/ or compensation until acquisition for financial loss.</li> <li>- Reduced boundary to exclude full or partial acquisition of land.</li> </ul>	<ul style="list-style-type: none"> <li>Fears and Aspirations</li> <li>Personal and Property Rights</li> <li>Decision Making</li> <li>Socio-economic Impacts</li> </ul>

**5.10. Aspirations or business requirements for development/ improvement of business sites, assets and residential housing impacted by scope, lapse period and uncertainty of the designation**

Submitters	Issues in scope
Southmall NoR1:33); KiwiRail Holdings Ltd NoR2:9); Carter Holt Harvey Ltd (NoR2:8); Harpartap Singh Kalra and Anjana Kalra (NoR3:19); Tibetan Residential Ltd (Nor3:29)	<ul style="list-style-type: none"> <li>- Concerns about planning blight – uncertainty and inability to make decisions and act to improve potential land resources (in line with current zoning) and sites for development, sale or lease, thereby creating potential loss on returns of investment, reducing future income generation opportunities for owners and families.</li> <li>- Causing anxiety and distress.</li> <li>- Inhibitive of positive local economic development, employment and investment potential/ opportunities.</li> <li>- Inhibitive of reducing local housing supply shortages.</li> <li>- Potential community conflict in NoR 2 regarding whose land should be used as construction sites.</li> <li>- Disempowerment of community and stakeholder and their participation in local decision making that excludes community-led opportunities, as alternatives, potentially offering beneficial outcomes for Southmall, the Manurewa Town Centre, the FTN and the community.</li> </ul>
KiwiRail Holdings Ltd Counties Energy Ltd Watercare Telecommunication Submitters	<ul style="list-style-type: none"> <li>- Concerns about access and improvement of key infrastructure to meet the needs of business and communities in line with future growth;</li> <li>- Concerns about safe operation of assets;</li> <li>- Protect autonomy of decision making on safety, use and future of assets.</li> </ul>
Relief sought	Social Effects Categories



<ul style="list-style-type: none"> <li>- Private submitter would like NoR withdrawn or designation boundary realigned to exclude affected properties.</li> <li>- Utility operators request key stakeholder consultation and engagement in detailed planning stages via amended condition for NUMP and inclusion in SCEMP and management plans.</li> <li>- Southmall requests key stakeholder engagement to present their alternative PPP options for NoR3 car park losses.</li> </ul>	<p>Fears and Aspirations Personal and Property Rights Decision Making Socio-economic Impacts</p>
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**5.11. Social effects of construction and operation for businesses**

Submitters	Issues in scope
<p>Restaurant Brands Ltd (NoR1:22); Hansaben Patel (NoR1:23); Z Energy Ltd (Nor 1,3); Manurewa Business Association (NoR 1, 3); Southmall Manurewa (NoR 1,3);</p> <p>Blue Snow Ltd (NoR2:3); Andromeda Miers Trust Partnership (NoR2:5); Active Electrical Suppliers (NoR2:6); Carter Holt Harvey property Ltd (NoR2:8); Drury Tires (NoR2:15); FirthStreet Ltd (NoR2:16)</p> <p>Super Liquor Manurewa (NoR3:2); Mayvan Holdings Ltd (NoR3:6); McDonalds Restaurants Ltd (NoR3:15); (NoR3:20); National Trading Company of NZ (NoR3:26); TCK Wong Doo (NoR3:30)</p> <p>Dianne and Neville Smith (NoR4:5); Continuous Spouting (NoR4:6)</p>	<ul style="list-style-type: none"> <li>- Change and disruption to the amenity, character and safety of Manurewa town centre.</li> <li>- Construction noise, vibration, dust and traffic in general is noted as having negative impacts on the quality of the environment, air quality, amenity, and access to Manurewa Town Centre during construction (NoR3),</li> <li>- Loss of car parking and access at Southmall and train station affecting way of life and business vitality.</li> <li>- Dust impacts on interior and exterior of businesses, particularly impacting businesses serving food or dependent on perceptions of hygiene and amenity.</li> <li>- Reduced potential for Manurewa Town Centre to not attract new business relocation with disruption from construction, inhibiting positive local economic investment and employment opportunities.</li> <li>- Concerns regarding severance of Manurewa town centre and surrounding residential areas, especially pedestrian, cycling and vehicle connections across the thoroughfares during construction.</li> <li>- In general, across all NoR's concerns with loss of business parking, supplier and customer access and amenity affecting efficient operation and disruption to key businesses which threaten business operations, jobs and livelihoods.</li> <li>- Disruption to business at 52 Popes Road and 94 Takanini School Rd.</li> </ul>
<p>Manurewa Local Board comments</p>	<ul style="list-style-type: none"> <li>- support the intent to demonstrate appropriate integration of the Manurewa Town Centre to address the interface and tie in of active modes pathways.</li> </ul>
<p>Relief sought</p>	<p>Social Effects Categories</p>
<ul style="list-style-type: none"> <li>- NoR withdrawn or designation boundary realigned to exclude affected properties.</li> </ul>	<p>Quality of the environment Way of life</p>

<ul style="list-style-type: none"> <li>- Request for more detailed construction information (site-specific).</li> <li>- Conditions that address submitters concerns.</li> <li>- The proposed conditions should be revised to require a BPO assessment prior to construction in the future that recognises the receiving environment as it exists at the time.</li> <li>- Amendments to conditions so that they adequately provide for engagement, in particular during the feasibility and detailed design stage.</li> </ul>	<p>Community Impacts</p> <p>Fears and aspirations</p> <p>Health and wellbeing</p> <p>Personal and property rights</p> <p>Community impacts</p> <p>Socio-economic</p>
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**5.12. Social effects of construction and operation for residents**

Submitters	Issues in scope
<p>Marencia du Plessis (NoR1:15); Carl Dean Howe (NoR1:16); Pathmavathay Govender (NoR1:19); Heritage New Zealand Pouhere Taonga (NoR1:21); Hansaben Patel (NoR1:23); Meenakshi Goyal (NoR1:24); Auckland Council – Parks and Community (NoR1:26); Ministry of Education (all NoRs); Manurewa Business Association (NoR 1, 3);</p> <p>Rajnesh Jai Singh (NoR3:1); Prem Chand and S Chand (NoR3:9); Awdisho Kamis and 30 signatories (NoR3:10); George Kamis (NoR3:11); P Umaria (NoR3:16); Wai Ming Chan (NoR3:20); Nitinkumar Patel (NoR3:22); Mahendra Kumar (NoR3:23); Orient Pacific Trust Ltd (NoR3:24); Accessible Properties Ltd (NoR3:25); Fire and Emergency NZ (NoR3:28); A &amp; M Self (NoR3:32); Kainga Ora</p>	<ul style="list-style-type: none"> <li>- Construction noise, vibration, dust and traffic in general is noted as having impacts on the quality of the environment, air quality, amenity, enjoyment of outdoor activities in local area and health, including quality of life and sleep disruption for shift workers or vulnerable residents.</li> <li>- Dust impacts on interior and exterior of homes.</li> <li>- Removal of on-street parking affecting residents and visitor access to homes, affecting way of life.</li> <li>- Fears for safety (residents and children) regarding new close proximity of widened road (in operation) and disturbance from noise of traffic, where the designation boundary abuts to residential properties.</li> <li>- Fears of property devaluation.</li> <li>- Loss and impact on community cultural values associated with modification/ destruction of heritage features Old Central School and WWI Memorial.</li> <li>- Change and disruption to the amenity, character and safety of Manurewa town centre.</li> <li>- Concerns regarding severance of Manurewa town centre and surrounding residential areas, especially pedestrian, cycling and vehicle connections across the thoroughfares during construction.</li> <li>- Loss of public open space, park land and community assets, inhibiting community access and enjoyment of public amenities, social infrastructure and green spaces.</li> <li>- Safety of children getting to and from school.</li> <li>- Disruption to learning during construction (Papakura Normal School), loss of land at front of property for construction activities may impact upon fire and emergency accessibility and evacuation.</li> <li>- Demolition dust, noise and vibration impacts on neighbouring properties and residents. Stress and anxiety.</li> <li>- Fear of losing residential tenants and rental income, as well as property value due to construction noise and traffic noise in close proximity to property.</li> <li>- Concern regarding construction and operational noise on</li> </ul>

<p>(all NoRs); Nilkunt Trustee Company Ltd (NoR3:40)</p> <p>George Khamis (NoR4:3); Awdisho Khamis (NoR4:4); Dianne and Neville Smith (NoR4:5); Graeme &amp; Anna Golding (NoR4:7); Akalmurat Singh Hora (NoR4:10); Alda Investments Ltd (NoR4:17); Simon and Julie Flemming (NoR4:19); Mimico Properties Ltd (NoR4:20)</p>	<p>vulnerable tenants (n.b. 59-59c Alfriston Road, Kainga Ora Properties and Auckland Council Housing for the Elderly sites).</p> <ul style="list-style-type: none"> <li>- Impacts of construction on public safety – delays or impediments to emergency services and safety of fire fighters and staff.</li> <li>- Construction and demolition impacts on childcare facilities, safety, access, sleep and privacy (52 Alfriston Rd and 120 Alfriston Rd). Concern for viability of childcare facilities and potential for loss of these tenants. Loss of childcare facilities to local families in the vicinity.</li> <li>- Impacts on residential structures and access.</li> <li>- Concern for neighbourhood health and safety with regards to construction traffic movements.</li> </ul>
<p>Manurewa Local Board comments</p>	<ul style="list-style-type: none"> <li>- is concerned at the proposed removal of the thoroughfare along Beaumont’s Way to Mahia Road</li> <li>- is concerned about potential noise and pollution impact on residents who find themselves living closer to the road, and particularly on both Alfriston Road and Porchester Road</li> </ul>
<p>Relief sought</p>	<p>Social Effects Categories</p>
<ul style="list-style-type: none"> <li>- NoR withdrawn or designation boundary realigned to exclude affected properties.</li> <li>- Survey of residents needs.</li> <li>- Request for more detailed construction information (site-specific).</li> <li>- Compensation.</li> </ul>	<ul style="list-style-type: none"> <li>Quality of the environment</li> <li>Way of life</li> <li>Health and wellbeing</li> <li>Personal and property rights</li> <li>Community impacts</li> <li>Socio-economic</li> </ul>

5.13. On a final general theme, it should also be noted that among those who made submissions inadequate consultation and engagement, a lack information and clarity about the Project, inadequate assessment of effects (social), and the request for full and adequate consultation and engagement throughout the designation and construction phases to alleviate these concerns were represented. These issues have their own social effects, not only to understand the project and its impacts on the resources, assets and wellbeing of people and place, but to participate in decisions that affect people’s lives, assets and livelihoods. This is expressed in terms of stress and anxiety, uncertainty, experiences of personal disadvantage, loss of autonomy of decision making about the future to protect and advance one’s personal and property rights, assets and resources and the interests of the wider community they belong to or provide for. These social effects have been an effect of the planning phase and will flow through, unless mitigated, into the designation and construction phases.

5.14. A number of submitters, particularly key stakeholders, have noted that they have not been actively engaged or consulted. It is not clear from the submissions, how widespread this issue is. Some have noted that the AEE and SIA has not listed some or most of them. (Utility operators, Ministry of Education, NZ Fire and Emergency, local schools, etc). This puts into question the thoroughness and purpose of the SIA. If consultation and engagement has been largely in the form of information provision, rather than for the purpose of engaging directly with all affected parties (land/ property owners, occupiers, key stakeholders, businesses

owners and in-proximity residents) to identify and assess the potential project impacts upon them, it is unlikely that the Requiring Authority has provided the relevant mitigation and management strategies necessary. This is reflected in the general tone of some submissions, which also point to a less than enthusiastic appetite for engaging with the community, stakeholders and affected parties outside of the PWA process. Some submitters affected by land acquisition comment on the Requiring Authority's 'unhelpful' 'unsupportive' engagement style, the short-time frame for providing submissions, and the absence of conditions that require the Requiring Authority to enable or take into account any feedback or input from all affected parties - landowners, leaseholders or occupiers, as well as key stakeholders.

- 5.15. These submission points and the relief sought are reflected in the following submissions, which are particularly pertinent to highlight:
- i) Accessible Properties Limited – advance notice of works If the proposed designation boundary is not altered, relief sought includes for Condition 23: is amended to require that a Schedule is prepared in consultation with owners and occupiers of the sites where construction noise is predicted to exceed the amended noise levels sought in the submitter's submissions on conditions 20 & 21. The Schedule shall be provided to the Manager at least one month in advance of Construction Works to ensure that the submitter has sufficient time to manage potential noise disturbance. If noise levels are proposed to be heightened for extended periods during construction then relocation of tenants may be required.
  - ii) Fire and Emergency New Zealand (NoR3:28) The submitter seeks that any proposed changes to the Manurewa Fire Station site and the immediate roading network are designed with full and transparent collaboration with the submitter to ensure any changes do not delay or impede response to an incident, nor increase the risk to the safety of fire fighters and the public during a response. The submitter would like to work with Auckland Transport and Auckland Council in early planning of transport routes to ensure positive community outcomes and an overall reduction of fatalities and injuries in Auckland.
  - iii) Zabeel Investments (NoR4:15) Alda Investments (NoR4:16) DE Nakhle Investment Trust (NoR4:17)- The ULDMP should also include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes. There is no obligation in the ULDMP condition for stakeholder participation to continue through the detailed design or to participate in earlier designs (e.g enabling works) which ultimately affect decisions and outcomes in the ULDMP. The SCEMP does not include any resolution process for where concerns of the landowner are not being adequately addressed by the outline plan / management plans.
  - iv) Telecommunications submitters, note the precedents set with the Airport to Botany and Northwest Transport Projects where conditions have stipulated adequate consultation over effects, as well as being provided the opportunity to discuss any future requirements so they can be considered at project design “during detailed design”.
  - v) Restaurant Brands notes “it is essential that landowners and occupiers are engaged throughout the works, particularly in preparation of the various construction management plans to be prepared to manage construction effects”.
  - vi) Ministry of Education - Future impacts on schools, requiring specific engagement as a key stakeholder to manage construction effects on current and future schools. Notes Ngatahi Warkworth NoR conditions that included the requirement that at least 6 months prior to construction the requiring authority shall identify a list of stakeholders, properties and identify methods to engage with stakeholders and submit this record with any Outline Plan.

- vii) Counties Energy – require further consultation and detailed planning concerning parts of NoR1 and NoR2 to address matters which may impact the location and safe operation of its assets.
- viii) Watercare requires early engagement from the requiring authority for future planning and construction works including prior to detailed design and during implementation of construction works.
- ix) Kiwi Rail requests conditions that enable further discussion and planning for capacity upgrades, access for construction, operation and maintenance alignment with RTN requirements.
- x) Z Energy request conditions that require consultation with affected landowners and occupiers to input into the preparation of all management plans, in particular Conditions 16 and 19 (CEMP and CTMP). Z Energy seeks that the Requiring Authority either amends these conditions to require affected parties to be engaged with to participate in the drafting of these management plans OR amends the SCEMP condition so that this requirement is clear. They also request that conditions are inclusive to refer to landowners and occupiers as all adversely affected parties, requiring consultation and input into decision making. In addition, this submitter requests that the conditions should require the Applicant to clarify the process and extent to which feedback from consultation with affected landowners, leaseholders or occupiers is taken into account.

5.16. Taking an overall view of the submissions, I feel it is important to make some concluding points that are derived from the analysis. Whilst the submissions broadly reflect the anticipated scope of the potential and actual social effects of the Project's planning, designation, construction and operational phases, they do not necessarily represent the scale and significance of these effects to potential receivers.

5.17. According to the Requiring Authority's AEE and SIA, there are 747 affected (full and partial acquisition) property titles within in the proposed designation footprint, and some 551 landowners have been identified. Whilst it is evident that some of the submitters are business tenants, asset owners (such as utility providers, etc), business or interest group representatives these represent a small proportion of the 114 submitters, it is fair to say that less than 20% of affected property owners have provided feedback. This percentage is significantly less when it comes to potentially affected business and residential tenants, community groups and the wider community, whose situations and the impact upon them is relatively unknown. This is by no means to negate the substance and weight of impacts felt by those individuals who have made submissions, but merely to state that the submissions may only reflect the 'tip of the iceberg'. The types of actual and perceived social impacts felt and expressed by the submitters and the relief sought will not be uncommon to many other individuals, families and groups whether property owners, occupiers or in proximity affected parties.

5.18. Whilst we can hypothesise as to the reasons for affected parties not making submissions - such as awareness and understanding, ability to engage with the submission process, the future-orientated nature of the Project activities, for example - it is integral, that for the designation to be approved, that every effort is made to ensure that this 'hidden' scale and significance for all affected parties, and not just for those who have made a submission, are appropriately avoided, remedied or mitigated in accordance with s.171 and Part 2 of the RMA. This is particularly important since the receiving environment in terms of local people and place may likely change significantly in the years between designation, construction and operation.

## 6. Comment on SGA Proposed Conditions

- 6.1. In light of my review of the Requiring Authority's SIA and public submissions, this section of the report focuses specifically upon the adequacy of the following proposed conditions:
- i) Condition No2. Project Information
  - ii) Condition No9. Stakeholder Communication and Engagement Management Plan and where relevant the SCEMP's relationship to the other proposed Management Plans where designation, construction and operational social effects can be better addressed.
- 6.2. Broadly speaking, the majority of the assessed social effects and recommendations of the Requiring Authority's SIA have been identified as corresponding to the either the Public Works Act process or the proposed Project information condition 2; Land Use Integration Process condition 3; SCEMP condition 9; and other relevant Management Plans as mitigation strategies. SGA's Social Impact S.92 response (Attachment A), provided clarity and demonstrated the corresponding condition to each assessment of impacts in a revised 'Appendix E – Assessment of social impacts'.
- 6.3. The outstanding, significant social impacts and recommendations made by the SIA that do not have a corresponding condition (as identified in the revised Appendix E) include the following:
- a) the management of vacant properties which have the potential to become sites of antisocial behaviour or can be leased to ensure occupancy;
  - b) the loss of shops and businesses that may not be able to relocate within the local community;
  - c) the impacts of the loss of community facilities/ access among community groups and providers and the corresponding community access to these services;
  - d) the change in community character due to the loss of shops; and
  - e) the loss of jobs due to business acquisition;
- 6.4. The SIA (Appendix E) did provide some mitigation suggestions to some of these issues, but they were not carried forward into the SGA's conditions. With the exception of c), these issues have been raised by submitters and, in my opinion, are relevant and have corresponding social effects that require mitigation and management strategies. Relevant conditions would need careful consideration and should be matters for the Requiring Authority to address in evidence at the hearing issues.
- 6.5. Despite some of the minor issues I have raised earlier with regard to the adequacy of the SIA, and particularly its acknowledged limitation of being able to undertake an accurate assessment of social effects that will occur in a future receiving environment, the scope and type of social effects, through planning, designation, construction and operation provide a sound foundation. The submissions provide this foundation with context and stark realism, albeit a snapshot in real time of affected parties responses to the actual and perceived impacts of the Project on them and their local place. In my opinion, it is the significance of the social effects and how they should be avoided, remedied and mitigated which is at issue. As they currently stand, the proposed conditions do not effectively ensure adverse effects are avoided, remedied or mitigated.

- 6.6. If the designation is confirmed, the Project will have adverse social impacts that cannot be avoided. It will also have the potential to generate positive social impacts, not just in the future delivery of a multi-modal transport network but also in the way it engages and works with the community and affected landowners, businesses, residents, and stakeholders to mitigate and manage its adverse effects. There is an opportunity to resource the community to participate as partners, rather than as adversaries, to leverage their networks, programmes and services in ways that can effectively support those adversely affected to cope and restore their aspirations.
- 6.7. One option is for the Requiring Authority to develop and implement a Good Neighbour Policy. These are increasingly used by the construction industry as they are one of the leading sources of noise complaints made to Local Authorities. Many local communities will regard the start of construction work in their neighbourhood with great concern. This concern includes noise, dust, road closures, increased heavy traffic and disruption to normal life. The proposed CEMP condition does not explicitly mention the behaviour of its workforce during construction but being a good neighbour means to act with consideration for all those who live and work in the area surrounding the construction site to minimise their inconvenience. There a number of resources online that could support the Requiring Authority to ensure its contractor workforce develops and maintains good public relations throughout the construction period.
- 6.8. Having evolved out of the traditional Social Effects Monitoring and Management Plan, a Development Response Management Plan (DRMP) is increasingly used as a constructive means of working alongside the community and affected stakeholders to mitigate the negative impacts and enhance the positive impacts of projects. This has been used with success by City Rail Link and was adopted by Airport to Botany hearings panel. It also features in the Eastern Busway project. A SCEMP is a consultation and engagement framework and set of methodologies. A DRMP is a management plan that specifically addresses the social effects on people and place and given that the future receiving environment will have changed by the time outline plans for stages of work will be prepared it is essential to ensure that a process of social impact assessment is included at this stage. In particular, its ability to work alongside residents, businesses and affected community groups and stakeholders to assess and identify mitigation strategies that the community can participate in and support provides for social corporate responsibility. Much of the ongoing work, knowledge and projects in the community, among NGOs, service providers, business associations, for example can be leveraged and supported by the DRMP to mitigate the projects negative impact, particularly those listed in Section 6.3 (a-e) above and further the Section below.
- 6.9. In light of the submissions and having also looked at other comparable NoRs<sup>3</sup> occurring throughout the Auckland region, the key social effects issues to get right with the conditions include the following.

<b>Social impact priorities to address with conditions</b>	<b>Why</b>	<b>How</b>
Adequate and early consultation	I am of the opinion that the SCEMP's purpose is not just a communications plan but a strategy	Amendments to the proposed SCEMP

<sup>3</sup> I have reviewed some comparable NoRs including Eastern Busway, Airport to Botany, Pukekohe Transport Network.

<p>and engagement with stakeholders, affected parties and the wider public to manage the impacts of designation and construction</p>	<p>that outlines the framework and methodology of engaging with the public stakeholders and affected parties to identify and understand the effects of the project phases that are to avoided, remedied and mitigated through the proposed Management Plans, including the recommended Development Response Management Plan. Stakeholders and affected parties have already expressed their concerns for enhanced clarity and information to help them understand the implications and impacts of the project, as well as needs and requirements to participate in decision-making, assessment of effects prior to construction at the detailed design stage, and be supported to feel empowered to make decisions about their futures. These concerns have generated social effects – fear, anxiety, distress – that the conditions should seek to remedy immediately and mitigate on an ongoing basis as is far as practical.</p>	<p>conditions. Amendments to the Project Information conditions. Requirement for a Development Response Management Plan (DRMP) to support mitigation of these issues.</p>
<p>Ability to undertake consented or other development/ improvement works under the designation.</p>	<p>Whilst this is not my area of expertise, to support the mitigation of the social effects this issue raises I am of the opinion that the project should provide access to information and support regarding s176(1)(b) of the RMA and the processes this requires.</p>	<p>Project Information condition and DRMP measures.</p>
<p>Health and wellbeing of affected parties now and into the future (property owners, occupiers and neighbours).</p>	<p>I contend that issues of emotional and mental health are significant, particularly in the post-covid environment where life is speeding up and complexifying rapidly and the stresses of the cost of living and other factors are making life hard. Our understanding and support of these health and wellbeing issues, as a society is thankfully improving. Whilst SGA and the project cannot control this environment, it can help alleviate, rather than add to it. If the outcome of the project is health and wellbeing and connection and making life simpler it is unfortunate that the process to get there results in impacts antithetical to those objectives. Again, SGA does not have to act alone, opportunities to mitigate or support affected members of the community could be managed through leveraging community organisation networks.</p>	<p>Requirement for a Development Response Management Plan (DRMP) to address this issue.</p>
<p>The impacts of the loss of community</p>	<p>Whilst the submissions have identified some facilities and services, in particular Child Care Centres, aged care facilities and those supporting</p>	<p>Requirement for a Development Response</p>



facilities/ access among community groups and providers and the corresponding community access to these services.	tenants with intellectual and physical disabilities, the scope and scale of impacted community infrastructure, services and facilities has not been fully mapped or assessed. Facilities and venues for community and religious groups and providers to deliver key social, health and family services, programmes in the local communities of Manurewa, Takanini and Papakura are extremely limited in an environment of the growth of these providers to address community need.	Management Plan (DRMP) to address this issue.
The management of vacant properties which have the potential to become sites of antisocial behaviour	This is potentially manageable under a condition requiring SGA to develop and implement a Property Management Strategy. This strategy type was developed for the CRL NoR <sup>4</sup> , has been adopted in the planning process of Eastern Busway EB3C and EB4L NoR, it was also recommended by the Airport to Botany NoR SIA as a means to tenancy manage and maintain occupancy and utility of properties until they are demolished, redeveloped and/or reinstated. This is particularly important particularly given the relocation timing and challenges faced by owners and occupiers.	A Property Management Strategy that establishes a policy of maintaining utility and occupancy, and a schedule and methodology of demolition in line with CEMP, ULMDP, CTMP, SCEMP and DRMP.
Disturbance to neighbours and quality of living environment during demolition and removal of property and buildings	The number and scope of buildings and property assets that will be under demolition and removal at any one time in each project site across the NoRs has the potential to have significant effects on the receiving environment and sensitive receivers. This activity has not been quantified or qualified to understand the extent of work and disruption.	A Property Management Strategy that establishes a schedule and methodology of demolition in line with CEMP, ULMDP, CTMP, SCEMP and DRMP. The strategy should also prioritise attention to limiting the amount of re-useable and recyclable materials that might end up in landfill.
The loss of local shops and businesses and support for those that may not be able to relocate within the local	The SIA responded to this issue recommending <i>“Assist local shops to identify and relocate to nearby location. Surplus land will be offered back to owner post-construction. For example, could consider rebuilding shops at the rear of 9 Great South Rd once construction is finished”</i> . I would suggest, alternatively, that local	Requirement for a Development Response Management Plan (DRMP) to address this issue.

<sup>4</sup> I have found the CRL Property Acquisition and Management Evidence of Deborah Shirley Godinet useful for this context  
<https://at.govt.nz/media/1168556/crlpropertyacquisitionandmanagementevidenceofdebgodinet.pdf>

community	businesses should be supported as far as practical by their Business Improvement District (BID) – Auckland Council and the business associations, such as Manurewa Business Association (MBA), whose purpose and capacity is to facilitate business and economic development for the local community. They are best placed, alongside Local Boards, Auckland Unlimited, Ministry of Business, Innovation and Employment (MBIE) and other stakeholders, to identify and develop locally-led strategies or initiatives that the SGA should resource and support as solutions. There is limited value to developing shops on reinstated land that is unintegrated and not strategically aligned to or located within the Town Centre. As identified by MBA and Southmall, the Requiring Authority should take into consideration proposals and opportunities already being discussed at the local community, business and stakeholder level.	
Changes in community/ town centre character, access and vitality	As above, community and business organisations, such as Papakura Business Association and Manurewa Business Association are already heavily involved in creating positive outcomes for their town centre’s safety, character, access and vitality, alongside local businesses. It is my opinion that the project conditions leverage, support and resource these organisations and their initiatives as a practical means of avoiding, remedying and mitigating the potential negative impacts of the designation and construction activities. Therefore, it is important that these key stakeholders are engaged in the detailed design stages of the project.	Requirement for a Development Response Management Plan (DRMP) to address this issue.
The loss of jobs due to business acquisition	The potential loss of jobs either through the closure or disruption to business in all NoRs is significant but has not been fully identified and assessed. For example, businesses in Drury note the threat of losing 27 jobs for locally employed families; McDonald’s notes some 101 jobs may be lost. The downstream socio-economic effects of job losses, particularly for the predominantly young Māori and Pasifika populations of Manurewa and Papakura on local families, households, individuals and the wider community, will be significant if not responded to. It would be remiss of SGA and undermining of their social corporate responsibility if the project did not seek to avoid, remedy and mitigate these issues.	Requirement for a Development Response Management Plan (DRMP) to address this issue.

<p>Local homeowners who are impacted are supported to relocate</p>	<p>This is an issue raised by the Manurewa Local board and is a significant issue with downstream socio-cultural impacts for the individuals and families, as well the neighbourhoods and wider community. It is my opinion that a reliance on the PWA does little to avoid, remedy or mitigate the impacts of losing one's home (as a family, physical and financial asset) and the stress, anxiety and costs associated with relocating to a new home. The housing market is tight, mortgage interest rates are at an all-time high and the cost of living crisis in a post-pandemic environment is affecting the health and economic wellbeing of local families, particularly those who constitute some of the most disadvantaged communities in south Auckland. Home ownership is at its worst levels for many years and the availability, affordability of decent homes to buy and/or rent is critically unsustainable. There is limited evidence to suggest that families needing to relocate will be able to do so within their local community which will mean disruption for children's education, insecurity, severance of community social ties and potential effects on families access to their places of work and recreation. It would be remiss of SGA and undermining of their social corporate responsibility if the project did not seek to avoid, remedy and mitigate these issues.</p>	<p>Requirement for a Development Response Management Plan (DRMP) to address this issue.</p>
<p>Loss of social housing and private rental housing</p>	<p>The need for adequate and affordable housing is acute in the communities affected by the project, and the project has the potential to significantly contribute in negative ways to this shortage and an increase in numbers of families on the housing waiting list. Solutions and strategies involving the housing sector (MHUD, Kainga Ora and local Community Housing Providers, as well as wrap-around support providers) must be facilitated by the project. It would be remiss of SGA and undermining of their social corporate responsibility if the project did not seek to avoid, remedy and mitigate these issues.</p>	<p>Requirement for a Development Response Management Plan (DRMP) to address this issue in conjunction with Land Use Integration Process condition.</p>

## 7. Recommendations

7.1. In light of the above analysis, I recommend the following modifications and amendments to the proposed conditions, as they pertain to the social effects issues I have discussed in this report.

### 7.2. Development Response Management Plan (new recommended condition)

- (a) A DRMP shall be prepared prior to the Start of Construction for a Stage of Work.
- (b) The objective of the DRMP is to provide a framework and suite of strategies and measures in consultation with local business and community stakeholders that assist those directly affected by the Project (including directly affected and adjacent owners e.g. businesses, community organisations, households, and their tenants) to manage the impacts of construction, and to maximise the opportunities the Project presents.
- (c) Business Associations and community groups representing businesses and residents within the relevant Stage of Work shall be invited no later than 18 months prior to the Start of Construction for a Stage of Work, to participate in the development of the DRMP.
- (d) To achieve the objective, the DRMP shall include:
  - (i) A list of those likely to be impacted affected by the Project
  - (ii) Recommended measures to mitigate impacts on those identified as affected by the Project associated with construction effects such as the potential loss of visibility of businesses from public spaces, reduction in accessibility and severance loss of amenity, mental and physical health effects and relocation. Such mitigation measures may include business support, business relocation, temporary placemaking and place activation measures and temporary wayfinding and signage, and mental health support and advice.
  - (iii) Identification of opportunities to coordinate the forward work programme, where appropriate with infrastructure providers, development agencies, Council and Local Board planning;
  - (iv) Recommended measures to mitigate effects on the operation and financial wellbeing of community organisations and sports clubs;
  - (v) Recommended hardship assistance package and hardship fund to be available for compensation to landowners, tenants, and adjacent property owners and details of how people will qualify for assistance.
  - (vi) Recommended measures to provide support for anxiety and mental health outcomes;
  - (vii) Recommended assistance for residential and business tenants, leaseholders or owners who are asked to move during the works.
  - (viii) Measures to achieve positive social outcomes, which may include supply chain opportunities, education, training and employment opportunities including partnerships with local business associations and community organisations, and by working with local organisations repurposing and recycling of demolition materials.
  - (ix) Identification of any other development response measures designed to support those businesses, residents and community services/facilities during construction.
  - (x) A record of the activities and assistance provided as a result of the measures listed in (ii)-(vi).
  - (xi) Linkages and cross-references to communication and engagement methods set out in other conditions and management plans (e.g. the SCEMP, PMS) where relevant.

### 7.3. Outline Plan (condition 7)

- (a) An Outline Plan (or Plans) shall be prepared in accordance with section 176A of the RMA.
- (b) Outline Plans (or Plan) may be submitted in parts or in stages to address particular activities (e.g. design or construction aspects), or a Stage of Work of the Project.
- (c) Outline Plans shall include any management plan or plans that are relevant to the management of effects of those activities or Stage of Work, which may include:
  - (i) Construction Environmental Management Plan;

- (ii) Construction Traffic Management Plan;
- (iii) Construction Noise and Vibration Management Plan;
- (iv) Urban and Landscape Design Management Plan;
- (v) Historic Heritage Management Plan;
- (vi) Ecological Management Plan;
- (vii) Tree Management Plan;
- (viii) Network Utilities Management Plan; ~~and~~
- (ix) Open Space Management Plan; and
- (x) Development Response Management Plan.

**7.4. Project Information (condition 2)**

- (a) A project website, or equivalent virtual information source, shall be established within 12 months of the date on which this designation is included in the AUP.
- (b) All directly affected and adjacent owners and occupiers shall be notified in writing once the website or equivalent information source has been established. The Requiring Authority will publicise the decision outcomes and location of the website throughout the community using relevant media sources and languages, at least on an annual basis throughout the project until completion.
- (c) The project website or virtual information source shall include these conditions and shall provide information on:
  - (i) the status of the Project, including ongoing engagement and activities in relation to implementation of the management plans;
  - (ii) anticipated construction timeframes;
  - (iii) contact details for enquiries;
  - (iv) the implications of the designation for landowners, occupiers, and business owners and operators within the designation, and where they can receive additional advice support;
  - (v) a subscription service to enable receipt of project updates by email; and
  - (vi) when and how to apply for consent for works in the designation under s176(1)(b) of the RMA.
- (d) ~~(b)~~At the start of detailed design for a Stage of Work, the project website or virtual information source shall be updated to provide information on the likely date for Start of Construction, and any staging of works.
- (e) The project website or virtual information source shall be updated to provide a copy of all SCEMPs and Management Plans outlined in Condition 7 DRMPs as they are developed for a Stage of Works.

**7.5. Property Management Strategy (new recommended condition)**

- (a) The Requiring Authority shall prepare and submit to Council for Certification a Property Management Strategy (PMS) within 12 months of the date on which this designation is included in the AUP.
- (b) The purpose of the PMS is to set out how the Requiring Authority will acquire the land and properties, whether fully or partially, required by the designation; and to provide a framework for the interim management of the Project portfolio, to ensure they do not deteriorate and adversely affect adjoining properties and the surrounding area. The

Strategy shall identify measures and methods to ensure the properties are managed in a manner that:

- (i) Does not significantly change the character, intensity and scale of the effects of the existing use of the land;
  - (ii) Maintains the condition of the property at that which existed at the time of purchase by the Requiring Authority;
  - (iii) Contributes to the functioning of the area within which the property is located;
  - (iv) Maintains occupancy as far as reasonably practicable; and
  - (v) Provides confidence to occupants, adjoining property owners, and the community that the properties are managed responsibly pending construction.
- (c) Within 40 working days of receiving written notice of Certification of the PMS by Council, the Requiring Authority shall notify in writing all directly affected owners and occupiers that the PMS is available on the Project Information website or equivalent that is required under Condition 2.
- (d) The PMS should correspond and support the DRMP's purpose.

#### **7.6. Construction Environmental Management Plan (CEMP) (Condition 16)**

- (a) A CEMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CEMP is to set out the management procedures and construction methods to be undertaken to, avoid, remedy or mitigate any adverse effects associated with Construction Works as far as practicable. To achieve the objective, the CEMP shall include:
- (i) the roles and responsibilities of staff and contractors;
  - (ii) details of the site or project manager and the Project Liaison Person, including their contact details (phone and email address);
  - (iii) the Construction Works programmes and the staging approach, and the proposed hours of work;
  - (iv) development of the Good Neighbour Policy including a schedule for educating construction workers on expectations associated with ensuring that the surrounding community (landowners, occupiers, businesses, and social organisations) feel safe and respected;
  - (v) details of the proposed construction yards including temporary screening when adjacent to residential areas, locations of refuelling activities and construction lighting;
  - (vi) methods for controlling dust and the removal of debris and demolition of construction materials from public roads or places;
  - (vii) methods for providing for the health and safety of the general public;
  - (viii) measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstructions to flood flows, actions to respond to warnings of heavy rain;
  - (ix) procedures for incident management;
  - (x) procedures for the refuelling and maintenance of plant and equipment to avoid discharges of fuels or lubricants to Watercourses;
  - (xi) measures to address the storage of fuels, lubricants, hazardous and/or dangerous materials, along with contingency procedures to address emergency spill response(s) and clean up;
  - (xii) procedures for responding to complaints about Construction Works; and

- (xiii) methods for amending and updating the CEMP as required

**7.7. Stakeholder Communication and Engagement Management Plan (SCEMP) (condition 9)**

- (a) A SCEMP shall be prepared in consultation with stakeholders, community groups and organisations.
- (b) The objectives of the SCEMP ~~is~~ are to:
  - (i) identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be proactively engaged with prior to and throughout the Construction Works; and
  - (ii) develop, maintain and build relationships with the wider public and diverse stakeholders (including directly affected and adjacent landowners e.g. Business, community organisations, householders and their tenants); and
  - (iii) provide opportunities for those new to the area to find out about and engage with the project;
- (c) To achieve the objective~~s~~ of the SCEMP:
  - (i) At least 18 months prior to any Outline Plan being submitted for Construction of a Stage of Work, the Requiring Authority shall identify:
    - A. The properties whose owners and occupiers will be engaged with;
    - B. A list of key stakeholders, community groups, organisations and businesses who will be engaged with including but not limited to Papakura Local Board, Manurewa Local Board, Franklin Local Board, Takanini Business Association, Manurewa Business Association, Ministry of Education, Kāinga Ora, KiwiRail, Fire and Emergency New Zealand, Auckland Council Parks, and Network Utility Providers;
    - C. Methods and timing to engage with landowners and occupiers whose access is directly affected.
    - D. Methods to engage and consult with the public, key stakeholders, community groups, organisations and businesses in a manner that strengthens the relationship of the Requiring Authority with those persons.
  - (ii) The SCEMP shall include:
    - A. Details of ~~(b)~~ (c) (i)A to E D;
    - B. the contact details for the Project Communications Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);
    - C. the procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;
    - D. methods for engaging with the Mana Whenua, to be developed in consultation with Mana Whenua Kaitiaki Forum;
    - E. methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in ~~(b)(i)A and C~~ (c) (i)A to D above; and

- F. linkages and cross-references to communication and engagement methods set out in other conditions and management plans where relevant.
  - G. A record of the consultation undertaken with the community and Mana Whenua, including specific access requirements for businesses and residents, including summaries of feedback, the Requiring Authority's response to that feedback; and
  - H. any outcomes or actions undertaken in response to feedback, as well as public complaints that are not covered by Condition 17 (Complaints Register).
- (d) ~~(c)~~ Any SCEMP prepared for a Stage of Work shall be submitted to Council for ~~information~~ certification ten working days prior to the Start of Construction for a Stage of Work and be reviewed at least annually.

7.8. I submit my report and recommendations to be considered as matters for the Requiring Authority to address in evidence at the hearing issues. However, I am of the opinion that the recommended mitigation conditions are considered sufficient to avoid, remedy and mitigate, where practical, the social effects of the proposed project and the designation can be confirmed.

7.9. **Dated** 04/03/2024



## Section 42A REPORT ON THE SOUTH FREQUENT TRANSIT NETWORK NOTICES OF REQUIREMENT – PARKS PLANNING

### 1. Introduction

- 1.1. My name is Daniel Kinnoch. I am a Director and Resource Management Planner at CoLab Planning, a planning consultancy based in Auckland. I hold a Bachelor of Urban & Regional Planning from the University of South Australia (2013) and I am a Full Member of the New Zealand Planning Institute. I have 12 years of experience working in or with local government, mainly in the Auckland region.
- 1.2. I am engaged by Auckland Council as an expert planner to provide specialist input for the Parks Sport and Recreation (PSR) department. I am providing independent expert planning evidence on parks, open space, recreation, and sports for statutory and consent processes. I have been involved in this project since October 2023. I am not engaged by or providing planning evidence for Auckland Council in its capacity as an asset and/or landowner.
- 1.3. I have reviewed the following documents in preparing this report:
  - 1.3.1. South Frequent Transit Network, Assessment of Effects on the Environment, October 2023, V1.0.
  - 1.3.2. Appendix A Assessment of Alternatives.
  - 1.3.3. Assessment of Arboricultural Effects, October 2023, V1.0.
  - 1.3.4. General Arrangement Plans for each NoR.
  - 1.3.5. South Frequent Transit Network, Social Impact Assessment, October 2023 Version 1.0.
  - 1.3.6. South Frequent Transit Network, Assessment of Landscape and Visuals Effects, October 2023 Version 1.0, specifically those sections of the report that relate to effects on public open spaces / reserves.
  - 1.3.7. Urban Design Evaluation (UDE), October 2023, Version 1, specifically the urban design response drawings and the notes and remarks on affected areas of open space.
  - 1.3.8. Form 18 documents for each NoR package, including conditions offered relating to management of effects on open space.
  - 1.3.9. Letter dated 10 November 2023, titled “*Re: Response to request for further information in accordance with section 92 of the Resource Management Act 1991 for the South Frequent Transit Network Project*”, which included further information responses to questions

asked under section 92 of the Resource Management Act 1991 (RMA).

- 1.3.10. Attachment A - Social Impact s92 response, which contains descriptions of impact and assessment references for affected parks and reserves, and a revised Appendix E – Assessment of social impacts.
  - 1.3.11. Submissions and summary of submissions on the South Frequent Transit Network Notices of Requirement.
  - 1.3.12. Manurewa Local Board Input on the NoRs.
  - 1.3.13. Central Park Reserve Management Plan (Draft – May 1993)
  - 1.3.14. Manurewa Open Space Network Plan August 2018
  - 1.3.15. Nga Ara O Manurewa | Manurewa Local Paths Plan August 2019
  - 1.3.16. Manurewa Local Board Plan 2023
  - 1.3.17. Manurewa Urban Ngahere Action Plan 2022
  - 1.3.18. Papakura Open Space Network Plan September 2019
  - 1.3.19. Papakura Greenways Local Paths Plan September 2016
  - 1.3.20. Papakura Urban Ngahere Action Plan 2022
  - 1.3.21. Papakura Local Board Plan 2023
  - 1.3.22. Code of conduct for expert witnesses in the Environment Court of New Zealand Te Kōti Taiao o Aotearoa Practice Note 2023, which sets out the standards and expectations for expert evidence.
- 1.4. I visited all affected park and open space sites on 25 October 2023. I observed the existing conditions, features, and functions of each site, and the potential impacts of the proposed works. I have where appropriate used photographs from this site visit in this report.

## **2. Code of Conduct**

- 2.1. This report is my expert technical evidence on the South Frequent Transit Network Notices of Requirement (NoRs) and submissions relevant to my area of expertise, which is parks planning. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this report and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

- 2.2. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

### **3. Scope and Structure**

#### **Subject Matter**

- 3.1. The scope of this report is to provide a parks planning assessment of the South Frequent Transit Network NoRs and the relevant submissions received on them. The NoRs consist of:
  - 3.1.1. South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)
  - 3.1.2. South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)
  - 3.1.3. South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)
  - 3.1.4. South Frequent Transit Network: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)
- 3.2. The NoRs seek to designate land for the purpose of constructing, operating, and maintaining a frequent transit network (FTN) along the southern corridor of Auckland, connecting Manukau, Papakura, and Drury. The FTN will consist of bus priority lanes, bus stops and shelters, active mode paths, signalised intersections, and associated infrastructure. The NoRs also seek to undertake works within and adjacent to existing and proposed parks and open spaces, which are the focus of my assessment.
- 3.3. The structure of this report is as follows:
  - 3.3.1. Section 4: Summary of key issues
  - 3.3.2. Section 5: Comment on the Assessment of Effects by Supporting Growth Alliance and Further Assessment
  - 3.3.3. Section 6: Submissions

- 3.3.4. Section 7: Local Board Input
- 3.3.5. Section 8: Comment on Supporting Growth Alliance Proposed Conditions
- 3.3.6. Section 9: Recommendations

#### 4. Summary of Key Issues

4.1. The key parks planning issues that I have identified and addressed in this report are:

Notice of Requirement	Key Parks Planning Issues
South FTN: Great South Road FTN Upgrade (NoR 1)	<ul style="list-style-type: none"> <li>i. Impacts on Anderson Park, Central Park, Central Park Cenotaph, Chisholm Corner, Slippery Creek Reserve</li> <li>ii. Potential Effects: Trees, vegetation, open space amenity, access, connectivity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>
South FTN: Great South Road (Drury Section) (NoR 2)	<ul style="list-style-type: none"> <li>i. Impacts on Karaka Reserve, Hingaia Stream Esplanade Reserve</li> <li>ii. Potential Effects: Trees, vegetation, riparian values, access, connectivity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>
South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)	<ul style="list-style-type: none"> <li>i. Impacts on Tadmore Park, Gallaher Park, Index Place Reserve, Alfriston Park</li> <li>ii. Potential Effects: Trees, vegetation, open space amenity, access, parking, connectivity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>
South FTN: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)	<ul style="list-style-type: none"> <li>i. Impacts on Addison Reserve</li> <li>ii. Potential Effects: Vegetation, open space amenity</li> <li>iii. Mitigation Measures</li> <li>iv. Alignment with Greenway and Local Board Plans</li> </ul>

Table 1: Key Parks Planning Issues in South FTN NoR

## **5. Comment on the Assessment of Effects by Supporting Growth Alliance and Further Assessment**

5.1. In this section, I provide comment on the Assessment of Effects on the Environment (AEE) and the supporting technical reports prepared by the Supporting Growth Alliance (SGA) for the NoRs, focusing on the aspects relevant to parks planning. I note areas of agreement and disagreement with the SGA assessment, and discuss where relevant the methodology, scope, and environmental effects assessments.

### **AEE Effects Assessment – General**

5.2. The AEE provides a high-level assessment of the potential benefits and adverse effects of the designation on the parks and open spaces, in terms of the provision of active mode facilities, connectivity, amenity, and ecological values. The AEE states that the designation will enhance the accessibility and connectivity of the parks and open spaces and provide opportunities for improved amenity and ecological values through planting and stormwater management. The AEE also acknowledges that the designation will result in some adverse effects, such as the loss of open space area, the removal of trees and vegetation, the disruption of access and parking, and visual and landscape impacts.

5.3. The AEE identifies the main construction activities that will affect the parks and open spaces, such as earthworks, vegetation clearance, site establishment, service relocation, and bridge replacement. The AEE also identifies the main construction effects that will affect the parks and open spaces, such as noise, vibration, dust, traffic, and visual impacts. The AEE states that the construction effects will be temporary and localised, and will be managed through the proposed conditions and management plans, such as the Construction Environmental Management Plan (CEMP), the Construction Traffic Management Plan (CTMP), the Construction Noise and Vibration Management Plan (CNVMP), and the Open Space Management Plan (OSMP).

5.4. The AEE provides a general overview of the operational effects of the designation on the environment, including on parks and open spaces. The AEE identifies the main operational activities that will affect the parks and open spaces, such as the operation and maintenance of the FTN, the active mode

paths, the stormwater wetlands, and associated infrastructure. The AEE also identifies the main operational effects that will affect the parks and open spaces, such as noise, vibration, traffic, and visual impacts. The AEE states that the operational effects will be minor or negligible and will be managed through the proposed conditions and management plans, such as the Urban and Landscape Design Management Plan (ULDMP), the Historic Heritage Management Plan (HHMP), the Tree Management Plan (TMP), and the Network Utilities Management Plan (NUMP).

- 5.5. While the AEE identifies most of the affected open spaces and reserves for each NoR, it does not identify all of them. The missing spaces were acknowledged in the requiring authority's section 92 response, namely Karaka Reserve and Hingaia Stream Esplanade Reserve for NoR 2, Tadmores Park, Index Place Reserve, and Alfriston Park for NoR 3, and Addison Reserve for NoR 4.
- 5.6. With the exception of Hingaia Stream Esplanade Reserve and Addison Reserve, both which are acknowledged as part of the NoR 3 and NoR 4 receiving environments respectively but are not otherwise assessed, the AEE and section 92 response provide a description of open space condition, function, and value, and a summary of anticipated effects in each location. The nomenclature of Addison Reserve under NoR 4 is disputed by the requiring authority in their s92 response at PP4, who consider it to be an unnamed reserve based on their review of Auckland Council's GIS, however I have confirmed via Auckland Council's GIS Park assets layer that Addison Reserve is its correct name (Figure 40).
- 5.7. I agree with the AEE that the designation will have some positive effects on parks and open spaces, such as through the provision of active mode facilities and connectivity, and the potential for improved amenity values. I disagree with the AEE's assessment of the magnitude and significance of some of the adverse effects, particularly on the open space amenity, access, and parking. I consider that the AEE has understated or overlooked some adverse effects, such as the loss of connection between the war memorial and adjacent parkland at the Central Park Cenotaph (refer para 5.22 below), and the potential for undesirable modifications to the distinctive mound at Chisholm Corner (refer para 5.27 below). These are matters that the requiring authority should address in evidence.

- 5.8. One aspect that I consider the requiring authority has not adequately addressed is the cumulative temporary or permanent loss of open space across the NoRs and what effect this could have on overall service provision for open space in the Manurewa and Papakura Local Board areas. Although some of the open spaces affected by the NoRs are relatively small or have low use, they still contribute to the network of parks and reserves that provide recreational and open space benefits to the communities. The loss or reduction of these open spaces, even temporarily, could diminish the quality and quantity of open space available and increase the pressure on the remaining spaces.
- 5.9. I acknowledge that many areas of open space proposed to be designated will be for temporary use during construction only. Many of the open spaces that are being temporarily 'taken' from (Karaka Reserve, Hingaia Stream Esplanade, Index Reserve, the car park area of Gallaher Park) would not currently function in a way that could be argued as being needed to be offset. However, this does not mean that their loss or impairment would not have any adverse effects on the open space values and functions.
- 5.10. I suggest that Auckland Council as landowner may like to address this issue in their evidence, noting they are a submitter on the NoR. They may have more information on the current and projected demand and supply of open space in the local board areas and the potential implications of the NoRs on the wider open space network in terms of cumulative effect. The requiring authority is also encouraged to provide further information on this matter in their evidence.
- 5.11. The following sections go on to provide an assessment of each open space that will be affected by the NoRs, and my evaluation of the effects and the requiring authority's proposed mitigation measures.
- 5.12. I concur with the requiring authority that the NoRs will overall enable better active mode facilities and connections, which will benefit the existing and future users of parks and open spaces in Manurewa and Papakura. This is a positive effect that is recognised and supported, and aligned with the Greenways Plans for the local board areas that the NoRs are within.

### **Anderson Park (NoR 1)**

- 5.13. Anderson Park is a suburban park in Manurewa that covers an area of 8,700 square metres. It is located on the corner of Great South Road and Grande

View Road and is surrounded by mature trees. A concept plan for a playground upgrade was approved in September 2022 (Figure 1), and these upgrades have since been undertaken (Figure 2). The upgraded playground features a flying fox, swings, slides, and a range of other play elements.

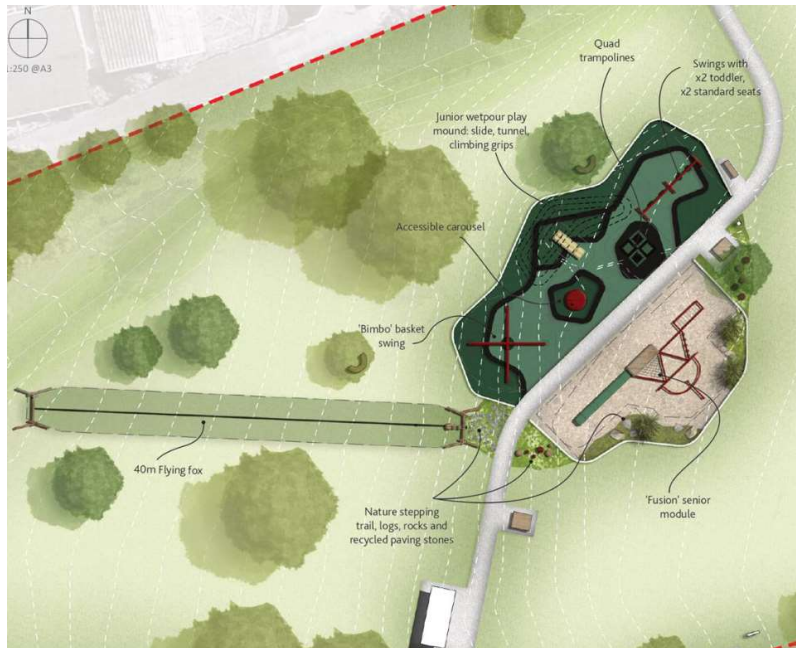


Figure 1 - Anderson Park Playground Proposed Upgrade Concept Plan. Source: Manurewa Local Board Meeting Minutes 15 September 2022



Figure 2 - Aerial Image showing playground upgrades that have taken place on Anderson Park. Source: Nearnap

5.14. Anderson Park is identified in the Manurewa Urban Ngahere Action Plan as being a suitable tree planting location, both around the playground and



throughout the park. This is notwithstanding the significant trees present along the Great South Road frontage.

- 5.15. The requiring authority anticipates that the designation will have minimal permanent effects on the park, as it will only involve the provision of an upgraded active mode facility utilising existing paths within the south-western corner of the park (Figure 3). The remainder of the extent of the designation, which is 760 square metres, is intended as temporary construction area offset. The requiring authority proposes to manage the interface with the mature trees (to be retained) through measures set out in TMP and OSMP conditions, while the construction impacts are intended to be managed through measures set out in their offered CEMP condition.
- 5.16. The requiring authority has provided an arboricultural effects assessment, which states at section 5.1.2.1 (page 15) that the design of work at Anderson Park avoids the removal of trees and any work within a tree protection zone (TPZ) would be in accordance with arboriculture best practice. As such, I am satisfied that the requiring authority intends to protect the existing trees in Anderson Park, and I otherwise defer to the council's expert arborist as to the appropriateness of the proposed tree protection conditions.

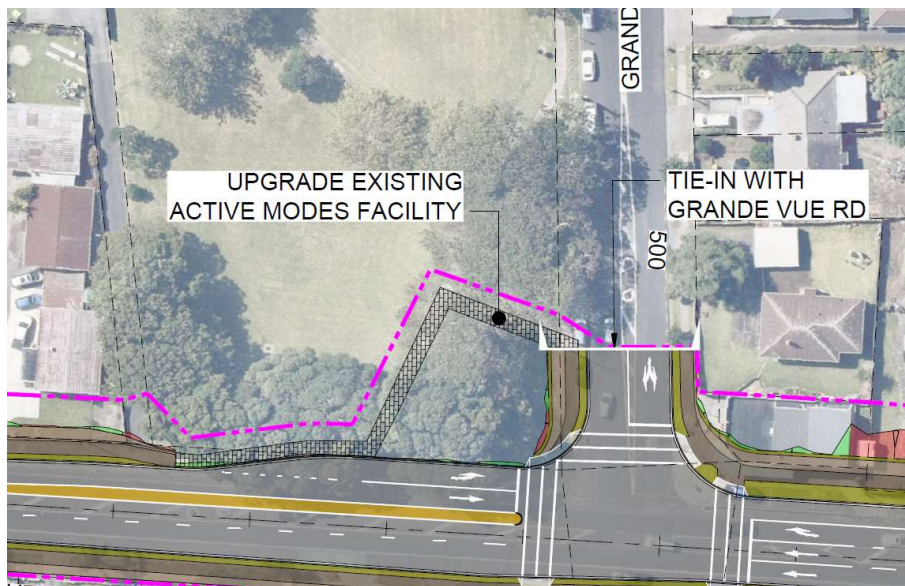


Figure 3 - Anderson Park, as shown on NoR 1 General Arrangement Plan, Drawing No SGA-DRG-STH-002-GE-4100.

- 5.17. My overall assessment of the effects of the designation on Anderson Park is that there will be little long-term adverse effect on the park, and that the

increased active mode provision may enhance the accessibility and utilisation of the park. The works are clear of the upgraded playground area including flying fox and will not compromise the amenity or function of the park. The temporary construction works within the reserve under the designation will not have more than minor effects on the overall park, subject to appropriate mitigation measures being implemented. Any effects on the trees will be considered by the council's arborist, who I defer to. I support the requiring authority's proposed conditions to manage the effects on the park.

### Central Park (NoR 1)

5.18. Central Park is a suburban park in Papakura that is subject to a Reserve Management Plan (RMP) prepared in 1993 under section 41 of the Reserves Act 1977. The RMP sets out the objectives, policies and actions for the management, development, and protection of the park. A new local park management plan is being consulted on that will include Central Park and a number of other parks in the Papakura Local Board area. Drafting of this plan is currently underway following public consultation from 10 October – 11 November 2023. The draft plan has no legal status at this time. The site of the open space is zoned Open Space - Informal Recreation Zone.



Figure 4 - Central Park, Papakura. Source: Site Visit Photo

5.19. The requiring authority has assessed that the anticipated effects of the designation on Central Park are limited and manageable. The permanent effects consist of earthworks and a short section of the active mode paths in

the north-western extremity of the park, while the rest of the works are within the existing road reserve. The temporary effects include the use of part of the park as a construction area offset. The requiring authority proposes to mitigate these effects through measures set out in TMP, OSMP, and CEMP conditions that they have offered as part of the NoR.

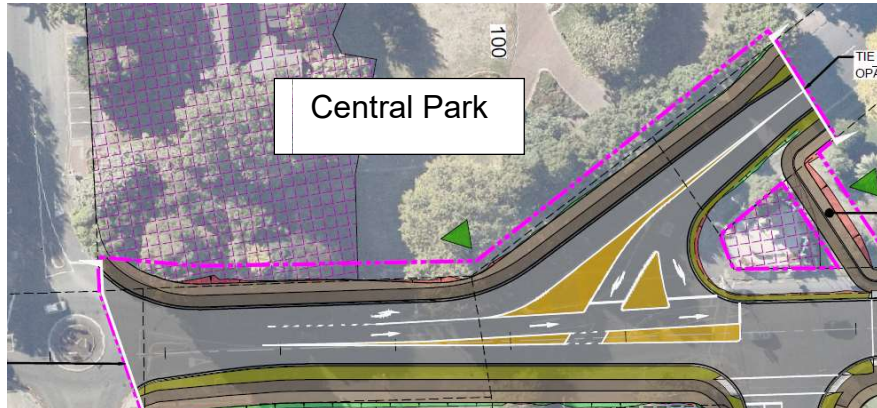


Figure 5 - Central Park, as shown on NoR 1 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4104. Proposed minor cut battering areas shown in red.

- 5.20. The overall functionality of Central Park, including its pedestrian connections and the like, will not be adversely affected by the proposed designation and works. I support the proposed NoR in this location and find no conflict with the current RMP. The cycleway and footpath upgrade works adjacent to the reserve will increase the activation of the reserve's edge and encourage more use of the park by the public. The encroachment into the reserve for construction works will for the most part be temporary and proposed conditions of the NoR will see that following completion of works, the designation boundary would be modified so as to reduce its spatial extent of encroachment.
- 5.21. A part of the designation and physical work is proposed within the north-east corner of the park, which is subject to a historic heritage overlay under the Auckland Unitary Plan. Potential effects on historic heritage in this area have been considered by council's heritage expert, Dan Windwood.

### **Central Park Cenotaph (NoR 1)**

- 5.22. The Central Park Cenotaph, also known as the Papakura-Karaka War Memorial, is a historical and cultural asset located to the south of Central Park, on the southern side of Opaheke Road. Its address is 278 Great South Road, Papakura.

- 5.23. The cenotaph was unveiled in June 1921 to commemorate the local soldiers who died in World War I, and later also included those who died in World War II. The cenotaph consists of an obelisk with plaques, with a number of flagpoles. In 1993, a plaque was added to honour those who served in Korea, Malaya, Borneo, and Vietnam. The cenotaph is listed as a Category B historic place in the Auckland Unitary Plan (AUP). There is also a protected Phoenix Palm within the grassed area of the open space. The site of the open space is zoned Open Space - Informal Recreation Zone.
- 5.24. NoR 1 proposes an active mode path detouring behind the cenotaph to the south, to provide a connection between Great South Road and Opaheke Road (Figure 6 and Figure 7). Some cut battering is shown as proposed. It is unclear why cut batters are required as the site appeared flat from my site visit and this is a matter the requiring authority may like to provide evidence on at the hearing.

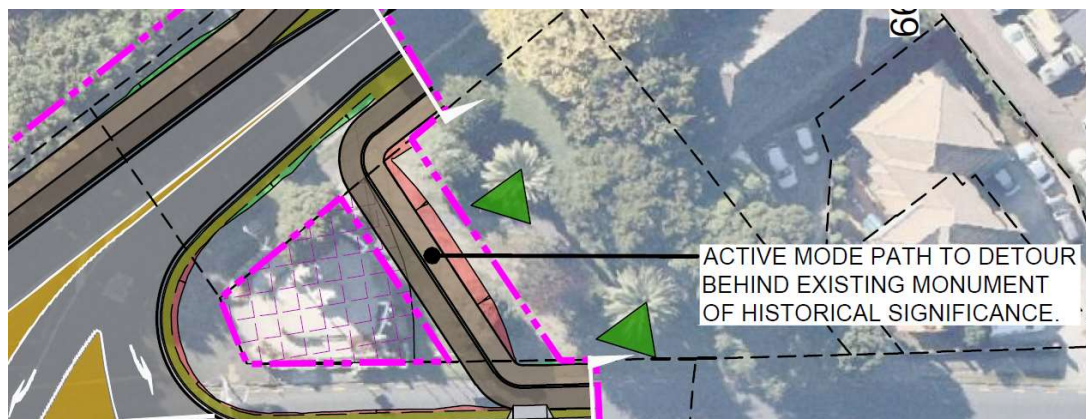


Figure 6 - Central Park Cenotaph, as shown on NoR 1 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4104. Proposed cut battering areas shown in red.



Figure 7 - Central Park Cenotaph, looking south from the cenotaph towards the grassed area of the park where the new active mode pathway will be located. Source: Site Visit Photo



Figure 8 - Central Park Cenotaph, looking north towards the cenotaph from the grassed area of the park. The new active mode pathway is proposed to wrap to the rear of the steps shown in this image. Source: Site Visit Photo

5.25. Effects on historic heritage have been considered by council's heritage expert, Dan Windwood, however it should be recognised that the amenity of the open space in this location does in part come from the cenotaph as a destination. Such historical features are often visited not only by those with an interest in remembrance, but by the elderly, and the safety of these members of the community need to be considered by the requiring authority in their design of the active mode path that passes to the rear and ability to cross into the balance of the open space via the existing path (see Figure 9 **Error! Reference source not found.**). It is unclear at this stage how the existing path will tie into the active mode path, or why the cenotaph itself is proposed to be subject to the designation if no works are proposed to it. The active mode path is also likely to introduce modern elements that are incongruous with the historic character and aesthetic of the cenotaph and park, such as signage, lighting, or pavement materials.



Figure 9 – Central Park Cenotaph, showing existing north-south path. Source: Auckland Council GeoMaps Park Assets Layer.

5.26. I have considered the balance between the need for active transport infrastructure and the importance of maintaining the integrity and setting of the open space in this location. I acknowledge that the proposed path will provide benefits for the local community and the wider network of walking and cycling connections. However, I also recognise that the cenotaph is a heritage feature, and that any adverse effects on its values and attributes may have a carryover effect on the open space in this location. I defer to the council's heritage expert as to the extent of what these effects may be. It is unclear why the requiring authority has not considered the alternative of providing for the active mode path within the existing road corridor up to and along the corner of the intersection between Great South Road and Opaheke Road. I recommend that the requiring authority address this in their evidence. I also recommend that the requiring authority undertake further consultation with relevant stakeholders, such as the local board, Royal New Zealand Returned and Services' Association, and the public, to explore alternative options or design solutions that could minimise the potential effects on the Central Park Cenotaph and the open space around it.

### **Chisholm Corner (NoR 1)**

5.27. Chisholm Corner is a council owned public open space located at the intersection of Great South Road and Settlement Road, to the south of the Papakura Cemetery. While the site is not scheduled in the Auckland Unitary Plan, it is recognised as a historic site in the Papakura Open Space Network Plan. The reserve is named after Adam Chisholm, who purchased the Hingaia Block in 1844.

5.28. The open space consists of a grassed area with a distinctive conical mound that rises above the surrounding landscape, and a red poppy atop (Figure 10). There is a flagpole at the intersection and a walkway up to the mound. The open space provides visual amenity and a sense of place for the local community and passers-by. The site of the open space is zoned Open Space - Informal Recreation Zone.



*Figure 10 - Chisholm Corner, looking north towards the mound from the intersection walkway. Source: Site Visit Photo*



*Figure 11 - Chisholm Corner, looking east towards the mound, in the area where cut excavation is proposed to provide for the active mode walkway/cycleway. The flagpole at the intersection can be seen in the background. Source: Site Visit Photo*



5.29. The NoR 1 designation and future works will, according to the section 92 response, result in permanent effects on the open space at Chisholm Corner. The active mode path will run along the western boundary of the open space, requiring cut battering on the mound, which may alter its shape and form (in the area shown in Figure 11). The requiring authority has not provided any details or justification for this alteration, nor any alternatives to minimise the extent of the earthworks. The requiring authority has deferred the assessment of the design outcomes to the process that come from their offered ULDMP condition.

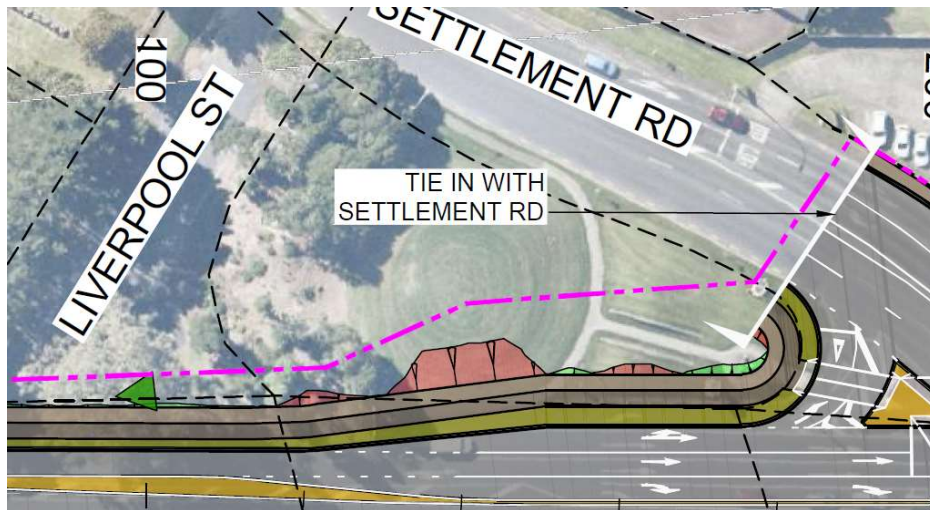


Figure 12 – Chisholm Corner, as shown on NoR 1 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4105. Proposed cut battering areas shown in red, fill battering shown in green.

- 5.30. With the limited information provided I consider that the cut battering has the potential to have a more than minor effect on the shape of the mound at Chisholm Corner when viewed from Great South Road.
- 5.31. Further, the flagpole on the intersection corner also looks likely to be affected. There is however no mention of this in the requiring authority's assessment.
- 5.32. I recommend that the requiring authority address in evidence the design of the proposed works at Chisholm Corner and explore options to avoid or minimise the effects on the mound, at least to the extent that its form is not comprised. The requiring authority should demonstrate why the battering works are necessary for the active mode path, and how any permanent effects will be mitigated. Hearing evidence should address whether any modifications are proposed to the flagpole location at the intersection.

## Slippery Creek Reserve (NoR 1)

- 5.33. Slippery Creek Reserve is a strip of open space that runs along both sides of Great South Road and follows the course of Otūwairoa (Slippery Creek), connecting to an esplanade reserve located to the rear of residential properties at 134 and 134A Great South Road (Figure 13). The reserve contains some mature trees, grassed areas, a parking lot, and a bridge that crosses the creek. The reserve provides a green corridor and a natural amenity for the surrounding residential and commercial area.
- 5.34. The Papakura Open Space Network Plan identifies Otūwairoa as a potential walking and cycling route. The Papakura Greenways Plan identifies three proposed greenway routes in the area, with connections through to the Hingaia Esplanade Reserve on the south, along Otūwairoa to the east, and along Pahurehure Estuary to the west (Figure 14). The proposed greenways are shown to the north side of Otūwairoa and to the west of the Hingaia Stream and are acknowledged in the Greenways Plan as being complex to deliver, and a longer-term priority due to the lack of landholdings in the area.



Figure 13 - Location of Slippery Creek Reserve, on either side of Great South Road. Source: Auckland Council GeoMaps Park Assets Layer.

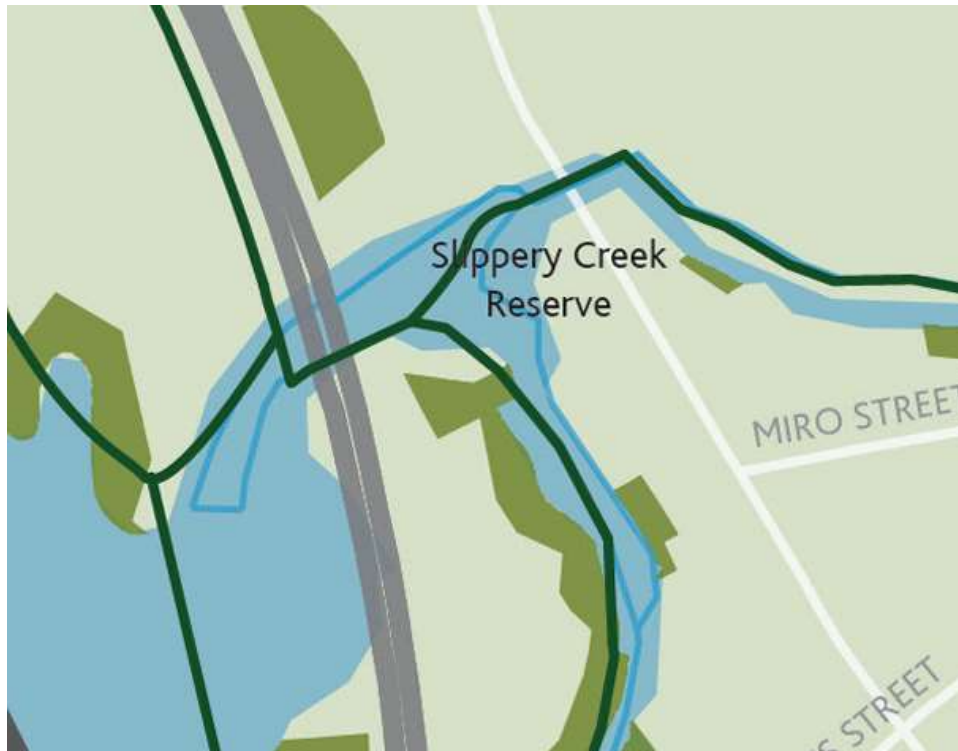


Figure 14 - Papakura Greenways Plan, Map 6, Slippy Creek Reserve

5.35. The works proposed in the location of Slippy Creek Reserve include earthworks, retaining walls, and bridge replacement. According to the requiring authority's section 92 further information response, these works will have limited permanent effects on the reserve, as most of the affected area will be reinstated after construction. The requiring authority also proposes to manage the construction impacts through the proposed CEMP and to enhance the urban and landscape design outcomes through the ULDMP.

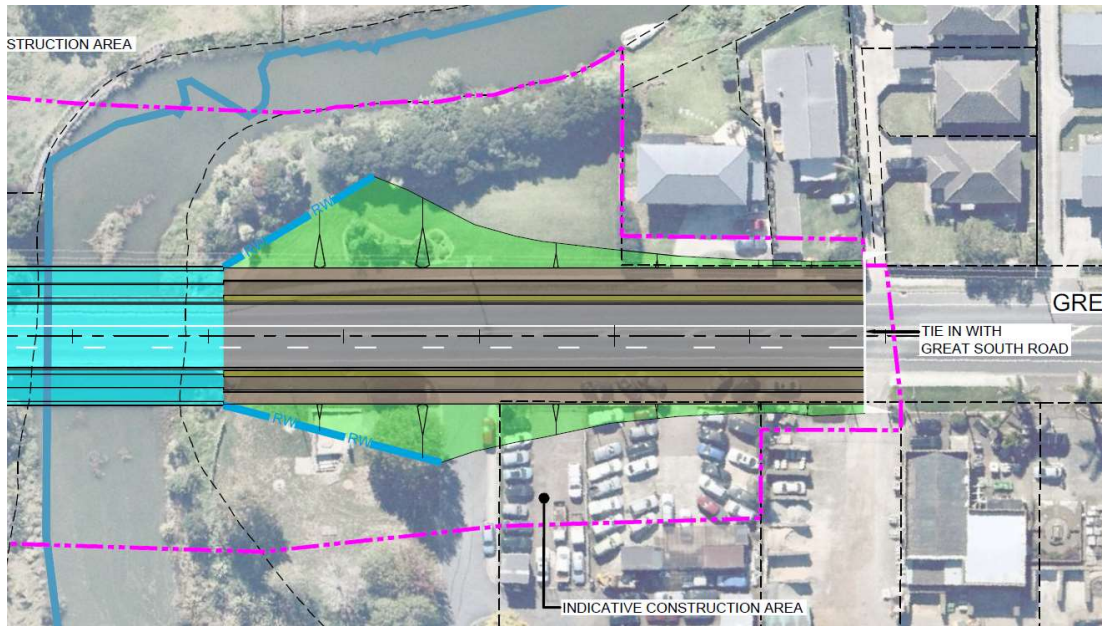


Figure 15 – Slippy Creek Reserve, as shown on NoR 1 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4107. Proposed fill battering area shown in green.

5.36. A point of difference between Slippy Creek Reserve and the other parks and open spaces affected by the project is that it does not have its own land parcel. The reserve appears to be located fully within the road reserve, or within the adjacent waterbodies, and does not have any open space zoning under the Auckland Unitary Plan (Figure 16). The open space appears to be owned by the requiring authority and under a park maintenance contract. This possibly means that the requiring authority already has control over the land and does not need to acquire any additional interests or rights for the proposed works. The requiring authority may wish to provide evidence at the hearing on this matter.



Figure 16 - Blue outline showing that Slippery Creek Reserve is located within the legal road reserve.  
Source: Auckland Council Unitary Plan Maps

- 5.37. Nevertheless, I have assessed the effects of the project on Slippery Creek Reserve as part of the open space network.
- 5.38. The temporary construction effects may see closure of access to the hard sealed at grade parking lot on the west side, which is accessed from Great South Road (Figure 17). This will restrict public use of the space for a period of time, however this will be remedied following completion of works. In my opinion, this is acceptable.



*Figure 17 - Vehicle entry that connects between Great South Road to the hard sealed parking area within the west side of Slippery Creek Reserve. Source: Site Visit Photo*

- 5.39. The proposed retaining support for the new bridge will have some visual effect within the reserve. This will be less noticeable on the east side which has a steep slope to the bank of the river and no formal seating/path elements that would see any appreciation of the wall, however some existing amenity planting will require removal (Figure 18). The wall on the west side will be visible alongside existing minor infrastructure, which may also need to be relocated further into the reserve dependant on the final wall location (Figure 19). The requiring authority should consider mitigation planting to replace that lost on the east side, and to soften the wall on the west, both which I expect would be an outcome from measures set out in the proposed ULDMP.



Figure 18 - Image showing area of proposed bridge retaining support on the eastern side of Slippery Creek Reserve adjacent to Great South Road. The amenity planting in this location will need to be removed as part of fill battering work. Source: Site Visit Photo



Figure 19 – Image showing area of proposed bridge retaining support on the western side of Slippery Creek Reserve adjacent to Great South Road. The utility cabinet on the right of the image may need to be relocated. Source: Site Visit Photo

5.40. No significant loss of open space is expected to result and the works in this location are overall supported from a park and recreation perspective.

5.41. In summary, I consider that the project will have minor or less than minor adverse effects on Slippery Creek Reserve, and that these effects can be appropriately avoided, remedied, or mitigated through measures set out in the proposed management plans. I do not have any specific recommendations for changes to the project design or the conditions in relation to Slippery Creek Reserve. The potential for a walking or cycle route along Otūwairoa is not compromised by the work proposed in this location, and I expect would be supported by the active mode upgrade works within the corridor.

5.42. There is an adjacent site that will be affected by proposed fill battering at 135 Great South Road Drury Auckland (Figure 20). This site appears to be used for commercial purposes. This site is accessed from Great South Road but also from the vehicle entry that serves the western side of Slippery Creek Reserve. Part of this site is zoned Open Space - Informal Recreation Zone. I have reviewed the title for this site and confirm that it is privately owned, and therefore not part of the publicly accessible open space network. Therefore, I have not commented on the effects of the project on this site, as they are outside the scope of my evidence.



Figure 20 - Red outline showing the privately owned parcel of land at 135 Great South Road that is subject to the Open Space - Informal Recreation Zone. Source: Auckland Council Unitary Plan Maps



## Karaka Reserve (NoR 2)

- 5.43. Karaka Reserve is a council owned public open space along the northern side of the Hingaia Stream, south of Great South Road in Drury. The site does not have any amenities or facilities for public use. The reserve is partly covered by construction material among a laydown area, weeds and rubbish and is adjacent to the SH1 corridor (Figure 21). The requiring authority's landscape assessment provides a description at section 5.2.2.1 which I agree with and adopt here. The Papakura Open Space Network Plan identifies this reserve as being potentially subject to storm surge and coastal inundation. The site of the open space is zoned Open Space - Informal Recreation Zone and is also subject to the Drury Centre Precinct.
- 5.44. The Papakura Greenways Plan identifies this reserve as forming part of a proposed greenway route, with a connection through to the Hingaia Esplanade Reserve on the northern side of Great South Road (Figure 22). The Drury Centre Precinct also identifies the site as being subject to an indicative collector road (Figure 23). I have reviewed the recently approved Drury Centre development, and no road has been approved via this reserve at this time.



*Figure 21 - Karaka Reserve, looking south-west from Great South Road, showing metalled laydown area on site, construction material, and lack of any obvious open space character or utilisation. Source: Site Visit Photo*



Figure 22 - Papakura Greenways Plan, Map 6, Karaka Reserve and Hingaia Esplanade Reserve



Figure 23 - Drury Centre Precinct Plan 2, the orange line showing the location of an indicative collector road, and key intersection with Great South Road in the location of Karaka Reserve

5.45. The requiring authority proposes to use Karaka Reserve as a temporary construction area and laydown area for the SGA project (Figure 24). This will involve earthworks and clearing of weed vegetation within the NoR extent of

approximately 5,490 square metres. The requiring authority also plans to provide active mode paths along the road edge as part of the permanent works. The requiring authority expects that the construction impacts will be managed through a CEMP and that the project will offer an opportunity to enhance the natural character and amenity of the stream and the reserve in the long term. The reserve will be inaccessible to the public during the construction phase, as it has been already for some time.

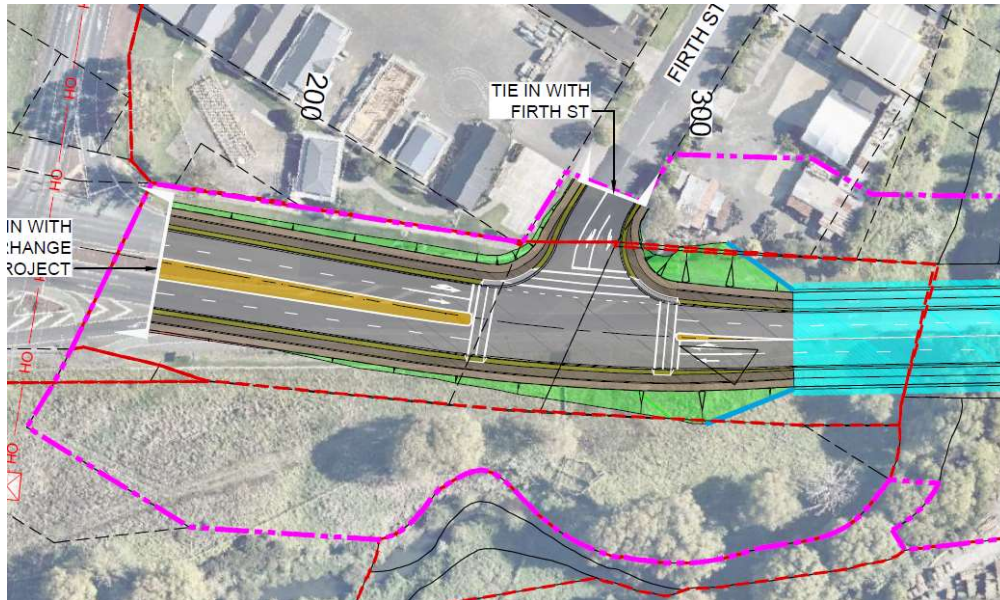


Figure 24 – Karaka Reserve, as shown on NoR 2 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4200. Proposed fill battering areas shown in green. Intersection upgrades shown with Firth Street and Great South Road.

- 5.46. I concur with the requiring authority's assessment of effects on Karaka Reserve. Based on the current state of the reserve, which is degraded and underutilised, I consider that the temporary adverse effects of using it as a construction area and laydown area are no different than those that already exist. Furthermore, I recognise that the project will provide an opportunity to restore and enhance the character and amenity of the reserve in the long term, which would be supportive of a future greenway route in this location, should the route be compatible with other transport projects such as those envisaged under the Drury Centre Precinct. Rehabilitation of this reserve will align with local board aspirations for parks. The proposed intersection improvements with Firth Street will also provide a safer crossing opportunity from the northern side of Great South Road, where commercial and industrial businesses are located, and the reserve, such that an upgraded reserve in this location could provide for some amenity benefit for workers.

5.47. One of the conditions offered by the requiring authority would see the designation boundaries be removed from around the reserve area in future once SGA project works are completed and the site is no longer required as part of construction. This is supported.

### **Hingaia Stream Esplanade Reserve (NoR 2)**

5.48. The Hingaia Stream Esplanade Reserve is located along the western bank of the Hingaia Stream, just to the north of Great South Road. It is bordered to the west by industrial and commercial properties located within the Business - Light Industry Zone. The esplanade reserve appears inaccessible, and has little amenity or recreational value, but it would likely serve some ecological and natural hazard protection value by providing a buffer between industrial land uses and the stream. I note that ecological effects are commented on in the memos of Council's ecology experts, Simon Chapman and Antoinette Bootsma, and I do not address those matters. The esplanade reserve itself is also located in the Business - Light Industry Zone and does not have open space zoning. The Papakura Open Space Network Plan identifies this reserve as being potentially subject to storm surge and coastal inundation.

5.49. The Papakura Greenways Plan identifies a proposed greenway route along the Hingaia Stream, connecting Karaka Reserve on the southern side of Great South Road, through to Slippery Creek Reserve to the north (Figure 22). There is limited ability to implement the greenway route at current as there are disconnected esplanade reserves along Hingaia Stream. There may be opportunities for the council to obtain further land in the location in the future if sites are subdivided.



Figure 25 – Hingaia Esplanade Reserve, looking west from the northern side of Great South Road.  
Source: Site Visit Photo

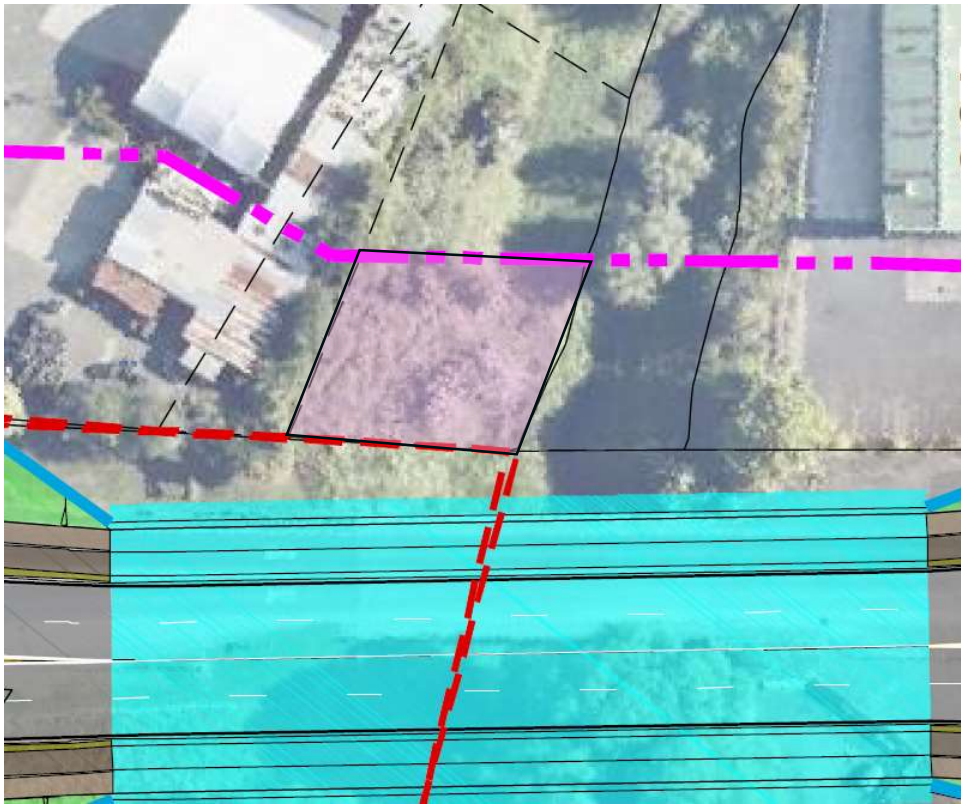


Figure 26 – Hingaia Stream Esplanade Reserve, as shown on NoR 2 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4200. No physical works are shown as being required within the area of the reserve proposed to be designated, which is shaded in pink.

- 5.50. While the proposed NoR 2 designation boundaries include a part of this esplanade reserve, no physical works appear to be proposed within it (Figure 26).
- 5.51. The requiring authority has not provided any information on why the esplanade reserve is requested to be designated, and may wish to do so in evidence at the hearing. However, as an assumption, I expect that it is to provide for construction clearance for the bridge works, rather than any long-term occupation or use. In this regard, provided the conditions offered by the requiring authority that require the designation boundaries to be reduced or removed from the esplanade reserve where the land is no longer required to be protected for public works, this can be supported.
- 5.52. The physical works themselves would appear to have no adverse effect on the reserve and its function as part of the open space network, or the potential future ability for this reserve to cater for public access and a greenway route. In this context, the NoR is supported in this location.

### **Tadmore Park (NoR 3)**

- 5.53. Tadmore Park is located on the eastern side of Great South Road, and adjoins Gallaher Park on its western side. The park is a council owned public open space, and has split zoning, with Open Space - Community Zone on the east side where Tadmore House is located, and Open Space - Informal Recreation Zone on the west side. Tadmore House is currently leased to a community group.
- 5.54. Tadmore Park is not identified in the Manurewa Urban Ngahere Action Plan in recognition of its existing tree cover.
- 5.55. The requiring authority's assessment of anticipated effects states that permanent effects on this reserve are limited to provision for active mode facilities on the western edge along Great South Road, and associated earthworks fill batters, which will result in vegetation loss along the road edge of the park. Up to twenty trees of varying species will be affected. The permanent works will also impact on access to the existing carpark serving Tadmore House, which will be reinstated after the completion of the works. No carparks will be permanently affected by the project. The physical extent of the park within the NoR is 1,130 square metres.



Figure 27 - Tadmore Park, as shown on NoR 3 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4300.

- 5.56. I defer to the council’s arborist, Leon Saxon, and their assessment of the potential tree removals within the park, however I note that these will have a resultant impact on the amenity of the open space and that tree loss should be minimised, and offset through new mature planting. The requiring authority provided an updated Appendix E – Assessment of social impacts as part of their section 92 further information response that states the mitigation proposed includes large replacement trees to reduce the amount of time required for vegetation to reach maturity.
- 5.57. Access to Tadmore House will be affected during the construction works, and it is unclear whether the requiring authority intends to manage the works to ensure that access is maintained, given there is only one access point. I consider that this is a matter that should be addressed in the requiring authority’s evidence.
- 5.58. From my site visit, I observed that part of the works area will also affect some park furniture, such as a bin and a seat, which would need to be relocated to a suitable location within the reserve in coordination with the asset owner. I recommend that the requiring authority consults with the council on the appropriate placement of these items during and after the construction works.
- 5.59. Overall, I consider that the effects on Tadmore Park in terms of open space and recreational provision are not significant and can likely be appropriately

managed, subject to some additional detail being confirmed by the requiring authority in their hearing evidence. I note that the project would also provide some benefits for the users of the park by improving the active mode connectivity along Alfriston Road and enhancing the streetscape. The adverse effect of the tree removals in this park however are significant, as concluded in the requiring authority's assessment of arboricultural effects at section 5.3.2 (page 22) and this matter is addressed in Leon Saxon's memo.

### **Gallaher Park (NoR 3)**

- 5.60. Gallaher Park is a council owned public open space located on Alfriston Road in Manurewa. It is a large site that offers a range of facilities for active and passive recreation, including a playground, four floodlit playing fields, grandstand, clubrooms, childcare centre, and at-grade car parking. The car parking is used by various groups that access the park, such as the Alfriston Road Kindergarten (lease expiry May 2033), Scout Association (lease expiry September 2033), and All Seasons Touch (lease expiry November 2025). The site of the open space is zoned Open Space - Sport and Active Recreation Zone.
- 5.61. Gallaher Park is identified in the Manurewa Urban Ngahere Action Plan as being a suitable tree planting location, with a desired 36 plantings throughout the open space.
- 5.62. The requiring authority has assessed that the project would have permanent and temporary effects on this reserve. The permanent effects are limited to the provision of active mode facilities along Alfriston Road and associated earthworks batters, which would result in some vegetation loss along the northern edge of the park. The temporary effects include the impact on access to the existing car park and the loss of approximately eight car parks during construction. These effects would be mitigated by the re-establishment of these car parks after the completion of the works, and the availability of over 50 other car parks that would remain unaffected by the project.





Figure 28 - Gallaher Park car parking area looking north toward Alfriston Road. Source: Site Visit Photo



Figure 29 - Gallaher Park car parking area looking south toward sporting oval and buildings. Source: Site Visit Photo

- 5.63. A matter that I consider should be addressed by the requiring authority is the reinstatement of the car parking spaces at Gallaher Park after the construction works are completed. The requiring authority has provided conflicting information on whether the full eight car parks that will be lost during construction are proposed to be replaced 1:1. In their further information response to PP1, they state that the car parks are temporarily lost during construction only and will be reinstated within the park. However, in their response to PP18 and PP19, they state that the car parks are "likely" to be reinstated, which implies some uncertainty. I consider that the requiring authority should clarify in their expert evidence whether they commit to replacing the car parks on a 1:1 basis. If the car parks are not reinstated, this would reduce the availability of parking for the park users. The requiring authority should address in expert evidence whether there is sufficient car parking on site for current and future demand during corridor works, as I do not have enough knowledge of whether the existing parking is in surplus or not. I do note that the Auckland Unitary Plan does not have minimum car parking requirements. As a submitter, Auckland Council as landowner may be able to advise in their evidence at the hearing whether they have minimum parking provision requirements under existing lease arrangements.
- 5.64. The requiring authority should also confirm in evidence whether vehicular access to the remaining car parking from Alfriston Road will be retained during the works. If this access is restricted, it would have greater effects on the use and enjoyment of the park by the public and the groups that rely on the car parking. The car parking at Gallaher Park is only accessible from Alfriston Road, and there is no alternative entry point. This means that any disruption or closure of the driveway would affect all the users of the park who rely on the car parking, not just those who use the spaces proposed to be removed temporarily. Therefore, maintaining access to the car parking during the works is essential to minimise the effects on the park's functionality and amenity. I recommend that the requiring authority provides more information on how they would manage the access and traffic impacts during the construction phase.
- 5.65. Overall, I consider that the long-term effects on this open space can be supported, as the proposed active mode facilities will enhance connectivity to Gallaher Park for all members of the community, ensuring optimum utilisation of the park and recreational assets. The temporary effects during project works however will require further consideration in evidence from the requiring authority to show how access and parking matters are being addressed.



Figure 30 – Gallaher Park, as shown on NoR 3 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4300. The open space area of the park proposed to be designated is shaded in pink.

5.66. In addition to the effects on Gallaher Park, the requiring authority also proposes to construct a stormwater treatment wetland within an adjacent site to the west at 7 Alfriston Road, Manurewa. The requiring authority discusses the effects of this work in section 11.2.2 of the AEE (page 131) in the context of the Manurewa Sport and Active Recreation Facilities Plan and Gallaher Park. This adjacent site however is not open space land, nor is it zoned open space. Therefore, I have not assessed or commented on this component of the proposed work as it is not within the scope of my evidence.

### **Index Place Reserve (NoR 3)**

5.67. Index Place Reserve at 92R Alfriston Road, Manurewa is a council owned public open space primarily used for stormwater management, featuring a pond that serves as a detention basin. A sealed driveway enters the site from Alfriston Road which would be utilised by contractors for maintenance access. The landscape consists of grassed areas, riparian vegetation, and no pedestrian pathways or formal recreational facilities. The reserve provides a natural aesthetic and potentially supports local biodiversity. Overall, it is a functional space with a focus on stormwater management and visual appeal rather than active recreation. The site of the open space is zoned Open Space - Informal Recreation Zone.

5.68. Index Place Reserve is not identified in the Manurewa Urban Ngahere Action Plan, however Index Place itself to the north is with regard to street tree planting.



*Figure 31 – Maintenance Driveway off Alfriston Road within Index Place Reserve, looking toward the stormwater detention pond. Source: Site Visit Photo*



*Figure 32 - Stormwater detention pond within Index Place Reserve. Source: Site Visit Photo*

5.69. The requiring authority describes the works in this location in the AEE as involving a considerable amount of fill, which the requiring authority has acknowledged will change landscape character but maintain the utilitarian function of the reserve. The extent of proposed fill batter and designation boundaries are shown in Figure 33.

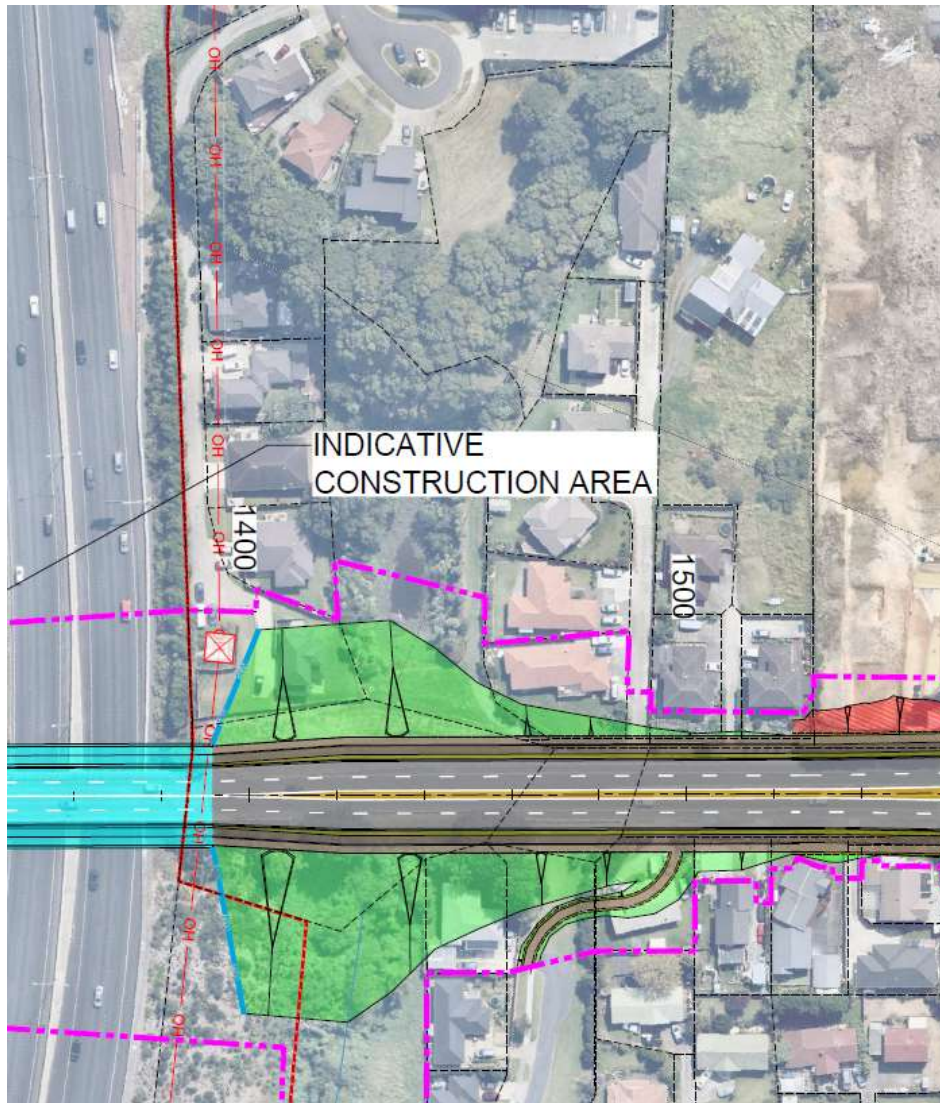


Figure 33 – Index Place Reserve, as shown on NoR 3 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4300. Proposed fill battering areas shown in green.

5.70. Based on the information provided, I have no concerns with the effect of the work in this location subject to appropriate re-grassing following completion of earthworks.

5.71. While not shown on the Nga Ara O Manurewa | Manurewa Local Paths Plan, there is the potential for a pathway on the site along the eastern edge of the

reserve, that could serve as a pedestrian link between Alfriston Road and Index Place (Figure 34). The completion of physical works within the NoR 3 corridor does not compromise the ability to provide for such a connection in the future. I would encourage the requiring authority to consider whether this is a connection that they may like to consider providing as part of mitigation for the physical works in this location, of which detail could be provided for as part of an updated ULDMP. Such a link would also support residents to the north better utilising the active mode upgrades.



Figure 34 – Index Place Reserve. Source: Auckland Council GeoMaps Park Assets Layer

### Alfriston Park (NoR 3)

5.72. Alfriston Park is a council owned public open space in Manurewa that functions as a Neighbourhood Park. The site of the open space is zoned Open Space - Informal Recreation Zone. The park contains large areas of lawned open space, a number of trees, and a playground. The requiring authority proposes a wetland on the southern half of the open space, which at section 10.3.3 of the AEE (page 76) they state will disrupt access and result in reduced open space utility during construction (Figure 35). It would appear however that the proposed wetland is one of six proposed stormwater

management devices for the South FTN (section 3.2.1 of the AEE, page 10) and would be permanent and not be exist only during construction. This is a distinction that the requiring authority should address in evidence. I have proceeded on the basis that the wetland is permanent.

5.73. Alfriston Park is not identified in the Manurewa Urban Ngahere Action Plan as being a suitable park tree planting location.

5.74. One of the potential positive effects of the requiring authority's proposal on parks and open spaces is the opportunity to align with and enhance the existing and planned local paths. The Nga Ara O Manurewa | Manurewa Local Paths Plan, recognised at page 130 of the AEE, sets out the long-term aspirational network of paths for walking and cycling in the Manurewa Local Board area. The AEE states that the designation will support the implementation of some of the local paths, such as along Great South Road and Alfriston Road.

5.75. The AEE does not specifically mention the Manurewa Local Paths Plan in relation to Alfriston Park. The park currently contains an existing path that provides for the local path shown in the plan (Figure 36), connecting Alfriston Road, the playground, and Saralee Drive (Figure 37). The path follows a direct and convenient route through the park, which encourages walking and cycling as modes of transport and recreation.

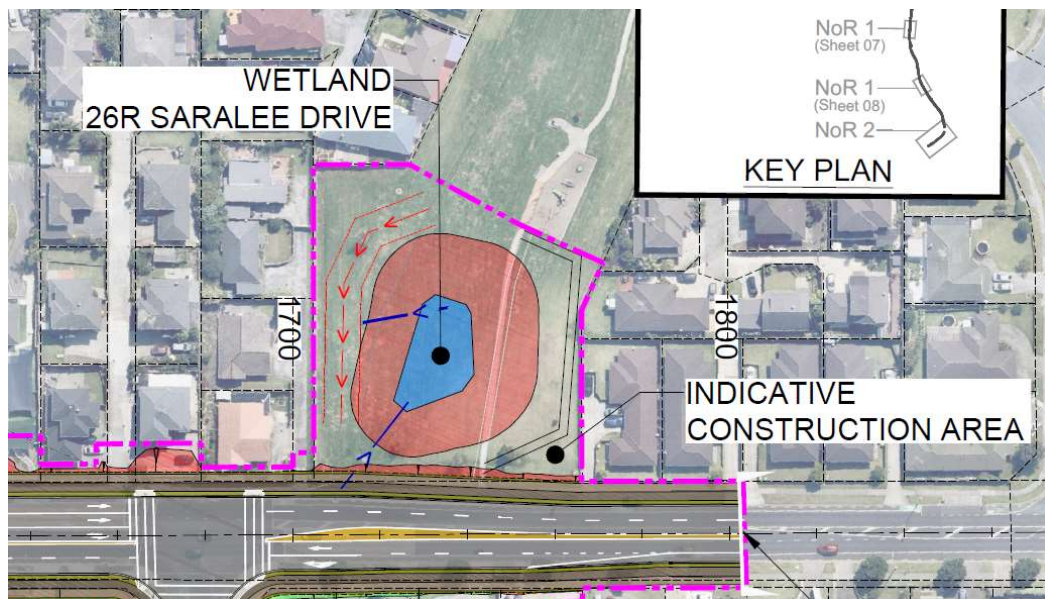


Figure 35 - Alfriston Park, as shown on NoR 3 General Arrangement Plan, Drawing No SGA-DRG-STH-005-GE-4300. This drawing shows the location of the proposed wetland and pathway relocation.

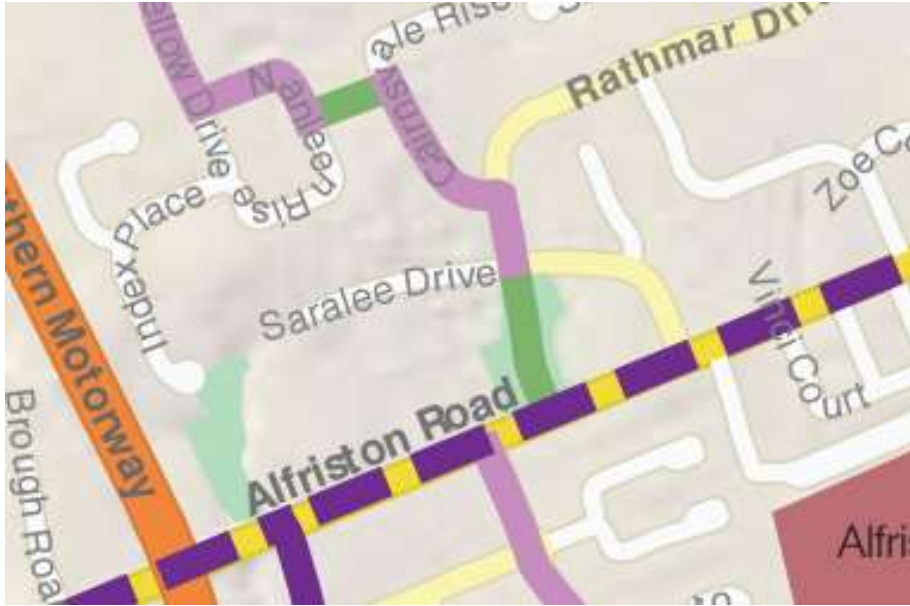


Figure 36 - Local Path - Open Space shown within Alfriston Park in Section 3.1 of Manurewa Local Paths Plan



Figure 37 - Existing Path within Alfriston Park, as viewed from Alfriston Road, looking north. Source: Site Visit Photo

5.76. The requiring authority proposes to retain a path within the park, but it will no longer have a direct desire line through the reserve. The path will have a shape that could be described as a modified 'J' or a 'hockey stick', and will come closer to the boundaries of the residential properties adjoining to the



east. This will result in a longer and less direct route for pedestrians and cyclists, which could reduce the attractiveness and usability of the path. Furthermore, the proximity of the path and playground to the wetland could pose safety risks for younger children, especially if there are no adequate barriers or fences to prevent them from accessing the water. The requiring authority should address these issues as part of the design of the wetland and the measures around the playground and provide some level of detail in their evidence at the hearing. The requiring authority should also consider how the works in this location are potentially reducing developable land for the council to provide for the recreational needs of the community, and whether this can be offset or compensated in some way.

- 5.77. I have considered the loss of a large, grassed area as an informal kick-around location. I consider however that ball activities may be better located away from Alfriston Road and closer to the quieter Saralee Drive.
- 5.78. Overall, the effects of NoR 3 on Alfriston Park are largely dependent on the final design and management of the proposed wetland and its surroundings. If the wetland is designed in a way where it will enhance the ecological and amenity values of the park, and if adequate safety measures are implemented, then the works could potentially improve the amenity and aesthetic of the open space. These aspects should be addressed in the ULDMP. However, the requiring authority should also reconsider the location and alignment of the path within the park, to ensure that it follows the natural desire lines of pedestrians and cyclists and does not compromise the functionality of the recreational area. I recommend this to be addressed in the requiring authority's evidence for the hearing.

#### **Addison Reserve (NoR 4)**

- 5.79. The requiring authority proposes to designate under NoR 4 a small area at the roundabout intersection of Airfield and Porchester Road, in the north-east corner of the open space shown on council asset maps as Addison Reserve (Figure 38). The AEE does not provide an assessment of effects on this reserve. The section 92 response has acknowledged that works are proposed here but has also not provided any assessment. The site of the open space is zoned Open Space - Informal Recreation Zone. Airfield Road itself is identified in the Papakura Greenways Plan as a proposed greenway route.

5.80. Addison Reserve contains National Grid infrastructure, some vegetation planting, and walking paths. Physical works in this location to upgrade the roundabout intersection and provide for battering would affect a small, planted area, with no significant vegetation or recreational function (Figure 39). The vegetation in this area is not significant, and the location does not serve a notable recreational purpose, thus minimising the potential for community impact. Figure 39 shows a modestly planted strip that appears to be more functional than aesthetic. The planned works in this location will not result in connectivity issues or loss of valuable green space for the community.

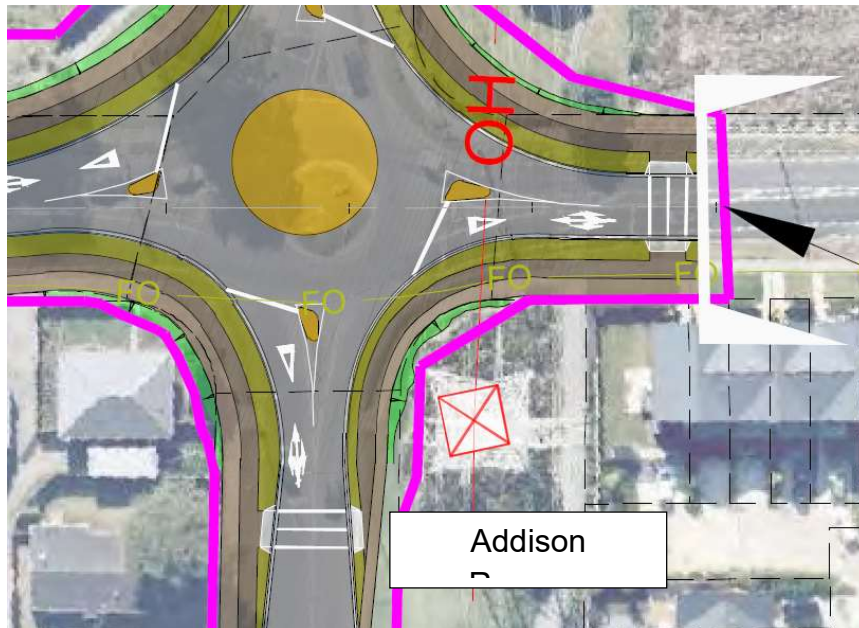


Figure 38 – The north-east extent of Addison Reserve, as shown on NoR 4 General Arrangement Plan, Drawing No SGA-DRG-STH-006-GE-4400



Photo *Figure 39 - Addison Reserve, photograph taken from Porchester Road looking west. Source: Site Visit*



*Figure 40 - Addison Reserve. Source: Auckland Council GeoMaps Park Assets Layer*

## 6. Submissions

6.1. In this section, I review and respond to the submission from Auckland Council Parks and Community Facilities (the submitter) on the NoRs. The submitter is the asset owner of the affected reserves and parks along the South FTN corridor. The submitter has opposed all three NoRs (NoR 1, NoR 2, and NoR 3) that affect its properties, and has raised various issues related to the loss of public open space, park land and assets, the effects on vegetation, streams, and esplanade reserves, and the adequacy of the proposed management

plans and conditions to avoid, remedy, or mitigate the operational effects of the designation.

- 6.2. Before I address these issues, I would like to re-clarify that I am an independent planning expert engaged by Auckland Council to provide evidence on the effects of the proposed designation on parks and recreation. I have not been instructed or influenced by the Council, this submitter, or any other party in the preparation of my evidence. My role is to assist the Panel by providing impartial and objective advice on the relevant matters within my area of expertise.

### **NoR 1: South Frequent Transit Network: Great South Road FTN Upgrade**

- 6.3. The issues raised by the submitter are as follows:

6.3.1. The loss of significant parts of its properties at 153R Great South Road; 165 Opaheke Road; 278 Great South Road; 287W Great South Road; 298 Great South Road; 312 Great South Road; 57R Wood Street; 58R Great South Road; 59R Wood Street; 69 Wood Street, which will reduce the area and character of the open space, the number and quality of trees and vegetation, and the access and parking for the park users.

6.3.2. The indirect effects of NoR 1 on the properties at 132 Great South Road; 16R Cooladerry Place; 286 Great South Road, Manurewa; 294 Great South Road, Papakura; 2R Creek Street; 320R Great South Road; 329 Great South Road; 345R Great South Road; 36 Coles Crescent; 473R Great South Road; 9R Buncrana Place; ESPLND RES 149 Great South Road; SRVCE LANE 18 East Street; SRVCE LANE 71 Great South Road; and 11R O'Shannessey Street, which may affect the visual and landscape amenity, the stormwater management, and the connectivity and safety of the park users.

- 6.4. My technical assessment of these issues is as follows:

#### *Loss of public open space, park land and assets*

- 6.5. The submitter has expressed concern over the loss of parts of some properties that are adjacent to the proposed NoR 1 corridor. These properties are listed

in the table below, along with my response to each of them.

<b>Property</b>	<b>My response</b>
153R Great South Road, Conifer Grove (St Aidan's Reserve)	No proposed designation of land within this reserve. General Arrangement Layout Plan SGA-DRG-STH-05-GE-4102 shows that all works will tie into existing road reserve. There are no adverse effects on this open space.
165 Opaheke Road, Drury	Unclear why this site is identified as affected. Is located 1.1km the north-west from Slippery Creek Reserve, and no designation is proposed in this location.
278 Great South Road, Papakura (Central Park Cenotaph)	Effects assessed at paragraphs 5.22 to 5.26.
287W Great South Road, Manurewa	This address is not open space. Records show this is a residential address not owned by Auckland Council. Unclear whether submitter is referring to the grassed area on the east side of the road adjoining the rail line. This grassed area is located within the legal road reserve. There is no designation proposed within the boundaries of either site.
298 Great South Road	<p>Unclear whether submitter is referring to this address in Papakura or Manurewa.</p> <p>The Manurewa site is a privately owned commercial property, and while is affected by the proposed NoR, is not open space and is therefore I have no comment.</p> <p>The Papakura site is the Papakura Cemetery. Effects on the cemetery are not within the scope of my evidence however I note that General Arrangement Layout Plan SGA-DRG-STH-05-GE-4105 show that all works will tie into existing road reserve, and there is no designation proposed within the cemetery site.</p>
312 Great South Road, Papakura (Chisholm Corner)	Effects assessed at paragraphs 5.27 to 5.32.
57R Wood Street, Papakura	This address is part of Central Park.


(Central Park)	Effects assessed at paragraphs 5.18 to 5.21.
59R Wood Street, Papakura (Central Park)	This address is part of Central Park. While there is no designation or works are proposed within this specific address parcel, I presume the submitter is preferring to Central Park overall. Effects assessed at paragraphs 5.18 to 5.21.
69 Wood Street, Papakura (Central Park)	This address is part of Central Park. While there is no designation or works are proposed within this specific address parcel, I presume the submitter is preferring to Central Park overall. Effects assessed at paragraphs 5.18 to 5.21.
58R Great South Road, Manurewa (Anderson Park)	Effects assessed at paragraphs 5.13 to 5.17

*Indirect effects*

6.6. The submitter has expressed concern over indirect effects on some properties that are nearby the proposed NoR 1 corridor. These properties are listed in the table below, along with my response to each of them.

<b>Addresses</b>	<b>My response</b>
132 Great South Road	<p>This address is located in Papakura, Takanini, and Drury.</p> <p>The Papakura and Takanini sites are commercial and do not appear affected by the proposed works under NoR1.</p> <p>The Drury site is an esplanade reserve adjoining to the south of Slippery Creek Reserve, on the west bank of Otūwairoa. Its formal name is Slippery Creek Esplanade Reserve. The site's zoning is split between Open Space – Conservation and Open Space – Informal Recreation Zone.</p> <p>Effects with regarding to Slippery Creek Reserve are assessed at paragraphs 5.33 to 5.42. I do not consider this esplanade reserve to be affected by the</p>

	<p>proposal. No physical works are proposed to the reserve. While physical access to the esplanade is possible from the south-east corner of Slippery Creek Reserve, there is no formal pedestrian access. In terms of future planning, there are greenways proposed in this location, but mapping suggests the route along Otūwairoa is proposed on its east bank.</p>
<p>16R Cooladerry Place, Papakura</p>	<p>Pedestrian link between Great South Road and Cooladerry Place. Located 800m north of the proposed NoR at Slippery Creek Reserve. I consider there to be no adverse effects.</p>
<p>286 Great South Road, Manurewa (Te Mahia Station Entrance)</p>	<p>This is land that was previously a commercial property but was purchased by Auckland Council as part of the Te Mahia Station Upgrade project. It is zoned Business - Light Industry Zone. The site has been upgraded and now forms a prominent entrance to the Te Mahia Station from Great South Road and has been designed to cater for outdoor activities including food trucks.</p> <p>The proposed designation boundaries extend into the site from the road to provide for the proposed active mode pathways. Adverse effects on this space are considered minimal, with only hard sealed areas likely to be affected. The NoR would, I expect, support connectivity to and utilisation of this space, and as long as the 'tie-in' between the spaces is undertaken in appropriate way in accordance with the measures set out in the proposed ULDMP condition, the use and functionality of this space should not be compromised.</p>

	 <p data-bbox="776 888 1352 997"><i>Figure 41 – Blue shaded area shows proposed NoR 1 in relation to Te Mahia Station Entrance, as shown on General Arrangement Plan, Drawing No SGA-DRG-STH-006-GE-4101</i></p>
<p data-bbox="321 1031 748 1171">294 Great South Road, Papakura (Papakura Recreation Centre – Elizabeth Campbell Hall)</p>	<p data-bbox="776 1031 1352 1245">Adjoins to the north of the Papakura Cemetery. General Arrangement Layout Plan SGA-DRG-STH-05-GE-4105 show that there is no designation proposed within this site. I do not anticipate any adverse effects on this open space.</p>
<p data-bbox="321 1251 716 1356">2R Creek Street, Drury (Hingaia Stream Esplanade Reserve)</p>	<p data-bbox="776 1251 1352 1503">This address forms part of the Hingaia Stream Esplanade Reserve that is located on the west bank of Hingaia Stream nearby Slippery Creek Reserve. There is no NoR or physical works proposed in this location. The NoR will not adversely affect this open space.</p>
<p data-bbox="321 1509 667 1539">320R Great South Road</p>	<p data-bbox="776 1509 1352 1577">This address is located in Manurewa and Papakura.</p> <p data-bbox="776 1619 1352 1900">The Manurewa property is an esplanade reserve on the northern bank of the Papakura Stream immediately to the west of the trunk line. While the NoR is proposed approximately 74m to the west on Great South Road, the proposed NoR ties into the existing road bridge that crosses the stream. No adverse effects</p>



on this open space are anticipated.



Figure 42 - Location of 320R Great South Road, Manurewa, in relation to Great South Road to the west. Source: Auckland Council GeoMaps

The Papakura property is a small slither of land to the south of Chisholm Corner, on the southern side of Settlement Road. It is about 12 square metres in size and is between the road boundary and the private property at 320 Great South Road. The Auckland Unitary Plan maps show this parcel as being road. The NoR appears to potentially propose to include this strip of land within the designation. I do not anticipate any park or recreational related effects associated with this land.

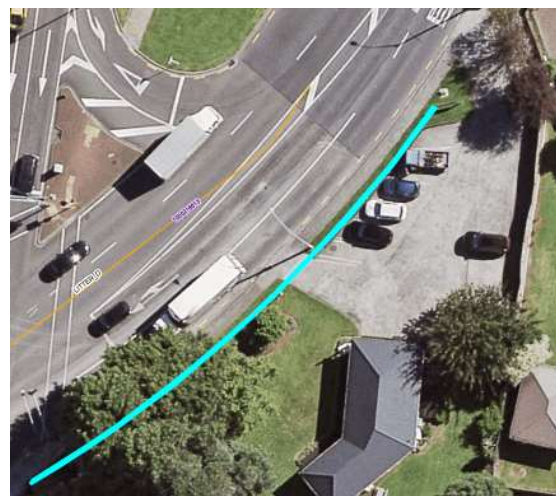
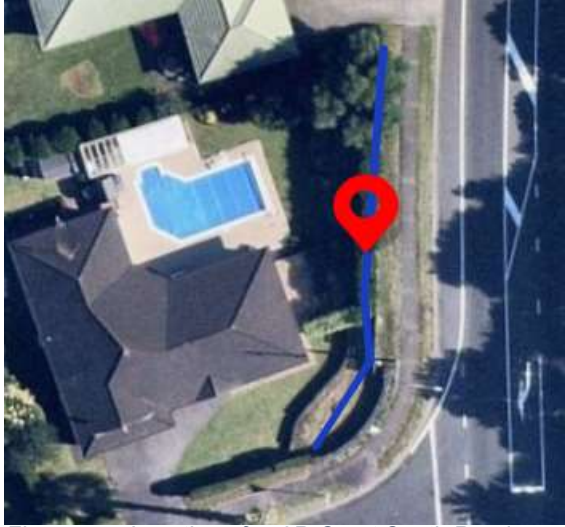


Figure 43 - Location of 320R Great South Road, Papakura. Source: Auckland Council GeoMaps

329 Great South Road

This address is located in Papakura and Conifer Grove.

	<p>The Conifer Grove property is an esplanade reserve on the southern bank of the Papakura Stream immediately to the west of Great South Road, adjacent to the Tuatahi Wetlands. The site is zoned Open Space - Informal Recreation Zone. While the NoR is proposed to the north-east on Great South Road, the proposed NoR ties into the existing road reserve in this location. No adverse effects on this open space are anticipated. The active mode upgrades in this location will strongly support connectivity in this area.</p> <p>The Papakura address is a privately owned residential property located to the south-west of the Central Park Cenotaph. I consider there to be no adverse effects in relation to this property.</p>
<p>345R Great South Road, Papakura (Willis Bush)</p>	<p>Willis Bush is located on the west side of Great South Road, opposite the Papakura Recreation Centre – Elizabeth Campbell Hall, and to the north of the NoR designation proposed at Chisholm Corner. No designation is proposed within the boundaries of this site, with the proposed designation ceasing at the Clark Road intersection about 70m to the south. I consider there to be no adverse effects in relation to this open space or its overall connectivity as part of the open space network in this area.</p>
<p>36 Coles Crescent, Papakura (Davis Car Park)</p>	<p>This address relates to the Davis Car Park, which is subject to Designation 1823 – Auckland Transport. The proposed NoR designation does not affect this site and stops short of the entry to it from Great South Road. It is unclear whether the submitter’s interest relates to the car park, or the planted areas of this site. The site is zoned Business – Metropolitan Centre Zone. I consider there to be no park or recreation related adverse effects in relation to this</p>

<p>473R Great South Road, Papakura</p>	<p>site.</p> <p>This site appears to be 2 square metres on the west side of Great South Road, adjacent to a residential property at 473 Great South Road. The Auckland Unitary Plan maps show this parcel as being road, and the space appears to be turf. The NoR does not propose works or to designate land in this location. I consider there to be no adverse effects.</p>  <p><i>Figure 44 - Location of 473R Great South Road, Papakura. Source: Nearmap</i></p>
<p>9R Buncrana Place, Papakura (Buncrana Reserve)</p>	<p>Buncrana Reserve is located on the west side of Great South Road, almost 1km north of where this NoR proposes to designate land in relation to Slippery Creek Reserve. No designation is proposed in this location. I consider there to be no adverse effects in relation to this open space or its overall connectivity as part of the open space network in this area.</p>
<p>ESPLND RES 149 Great South Road, Drury</p>	<p>This site is an esplanade reserve on the east bank of the Hingaia Stream, approximately 130m south-west of the NoR works proposed at Slippery Creek Reserve. The site's zoning is Open Space – Informal Recreation Zone. It appears landlocked and unless an easement is available to it over adjacent residential land, may not be physically accessible.</p>

	<p>Effects with regarding to Slippery Creek Reserve are assessed at paragraphs 5.33 to 5.42. I do not consider this esplanade reserve to be affected by the proposal. No physical works are proposed to the reserve. In terms of future planning, there are greenways proposed in this general area, but greenway mapping suggests the route along Hingaia Stream is proposed on its west bank, where there is a more continuous network of open space and esplanade reserves.</p>
<p>SRVCE LANE 18 East Street, Papakura</p>	<p>This site is a service lane to the rear of properties that front onto Great South Road. The NoR does not propose a designation in the immediate vicinity. I am unclear on what the concerned effects are, and I consider there to be none.</p>
<p>SRVCE LANE 71 Great South Road, Papakura</p>	<p>This land parcel appears to be related to the Davis Car Park, which I have addressed above. The site is hardseal and not appear to form part of the open space network, nor do I consider there to be any indirect adverse effect on this land.</p>
<p>11R O'Shannessey Street, Papakura</p>	<p>This site is a small parcel of land in the Business – Metropolitan Centre Zone that contains the Roseland toilets. The NoR does not propose to designate land proximate to this site. I consider there to be no adverse effects in relation to this land in terms of open space or recreation.</p>

**NoR 2: South Frequent Transit Network: Great South Road FTN Upgrade (Drury Section)**

6.7. The issues raised by the submitter are as follows:

6.7.1. Effects on the property it owns at 279 Great South Road, Drury, including but not limited to the scale of effects on the vegetation, the stream, and its function as an esplanade reserve. The submitter seeks for all adverse effects on the property to be avoided, so that its natural features are preserved and maintained.

6.8. The property referred to by the submitter is the Hingaia Esplanade Reserve. I have assessed the effects of NoR 2 on this open space at paragraphs 5.48 to 5.52 of my evidence. I concluded there that I consider there to be no adverse effects on the reserve or its function, or potential to be utilised as part of a future greenway in this location.

6.9. While the designation boundaries include a part of this esplanade reserve, no physical works are shown as proposed on the NoR drawings, and the space is likely to only be used as a construction buffer area associated with proposed works to the existing Great South Road bridge over the stream.

### **NoR 3: South Frequent Transit Network: Weymouth, Alfriston and Great South Road**

6.10. The issues raised by the submitter are as follows:

6.10.1. The direct effects of NoR 3 its properties at 238R Great South Road; 26R Saralee Drive; 21R Alfriston Road; 29 Alfriston Road; 33 Alfriston Road; and 92R Alfriston Road. Adverse effects on the tenants of the Housing for Elderly properties are of great concern, as well loss of public open space, park land and assets including access. For the Housing for Elderly properties, the submitter requests that these properties are preserved and maintained, and/or fully reinstated to the same or a better condition than they were prior to any works associated with the proposed designation.

6.10.2. The indirect effects of NoR 3 on the properties at 21R Beaumonts Way; 22 McAnnalley Street; 26 McAnnalley Street; 28 McAnnalley Street; 274 Great South Road; and 8 Selwyn Road.

6.11. My technical assessment of these issues is as follows:

*Loss of public open space, park land and assets*

6.12. The submitter has expressed concern over the loss of parts of some properties that are adjacent to the proposed NoR 3 corridor. These properties are listed in the table below, along with my response to each of them.

<b>Property</b>	<b>My response</b>
238R Great South Road, Manurewa (Tadmore Park)	Effects assessed at paragraphs 5.53 to 5.59.
21R Alfriston Road, Manurewa (Gallaher Park)	Effects assessed at paragraphs 5.60 to 5.66.
26R Saralee Drive, Manurewa (Alfriston Park)	Effects assessed at paragraphs 5.72 to 5.78.
29 Alfriston Road, Manurewa (Haumaru Housing, Gallaher Court)	This is Haumaru Housing and not part of the open space network. It is not within the scope of my evidence to provide further assessment with regard to the submitter's interest in this property.
33 Alfriston Road, Manurewa (Haumaru Housing, Alfriston Court)	This is Haumaru Housing and not part of the open space network. It is not within the scope of my evidence to provide further assessment with regard to the submitter's interest in this property.
92R Alfriston Road, Manurewa (Index Place Reserve)	Effects assessed at paragraphs 5.67 to 5.71. Early in my involvement in providing input on this project I sought asset owner input and was advised that they were supportive of the proposed NoR in relation to this reserve. I am not aware of why this position has changed or the effects the submitter is concerned with and they may be able advise in their evidence at the hearing.

*Indirect effects*

6.13. The submitter has expressed concern over indirect effects on some properties that are nearby the proposed NoR 3 corridor. These properties are listed in the table below, along with my response to each of them.

<b>Property</b>	<b>My response</b>
21R Beaumonts Way,	Alice Park is not located nearby the NoR

Manurewa (Alice Park)	3 corridor. It is approximately 200m the west of Great South Road and separated by an entire block and the trunk railway line. I consider there to be no adverse effects in relation to this open space or its overall connectivity as part of the open space network in this area.
22 McAnnalley Street, Manurewa (Gallaher Park)	This site forms the south-western part of Gallaher Park and adjoins Tadmores Park to the west. The site is turfed. Effects on Tadmores Park are assessed at paragraphs 5.53 to 5.59 above. Effects on Gallaher Park are assessed at paragraphs 5.60 to 5.66 above. I consider there to be no specific adverse effects in relation to this land parcel.
26 McAnnalley Street, Manurewa (Gallaher Park)	This site is in effect a part of Gallaher Park and is one of two land parcels at the intersection of Gallaher Street and McAnnalley Street in the southern part of the open space. The site is made up of a passive grass area. Effects on Gallaher Park are assessed at paragraphs 5.60 to 5.66 above. I consider there to be no specific adverse effects in relation to this land parcel.
28 McAnnalley Street Manurewa (Gallaher Park)	This site is in effect a part of Gallaher Park and is one of two land parcels at the intersection of Gallaher Street and McAnnalley Street in the southern part of the open space. The site is made up of a passive grass area. Effects on Gallaher Park are assessed at paragraphs 5.60 to 5.66 above. I consider there to be no specific adverse effects in relation to this land parcel.
274 Great South Road, Manurewa	This is a park asset located at the north-east corner of the intersection of Great South Road and Myers Road. The NoR 3 designation is proposed approximately 95m to the north, where it ties into Great South Road. I consider there to be no adverse effects in relation to this open space or its overall connectivity as part of the open space network in this area.
8 Selwyn Road, Manurewa	This site is the Manurewa Transport

(Manurewa Transport Interchange)	Interchange. It is not part of the open space network, and therefore it is not within the scope of my evidence to comment on the effects on this site.
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## 7. Local Board Input

- 7.1. On December 7, 2023, the Manurewa Local Board under resolution number MR/2023/219 provided Local Board Views on the South FTN NoRs.
- 7.2. The Manurewa Local Board resolved that significant trees at Anderson Park should be protected and requested that they be accommodated in the design of NoR 1.
- 7.3. They also sought clarity on the impact of the stormwater and landscape response at Gallaher Park for NoR 3.
- 7.4. In regard to Anderson Park, no trees are proposed to be removed. I have addressed this point at paragraph 5.16.
- 7.5. In regard to Gallaher Park, no stormwater detention or wetland devices are proposed on the reserve, as addressed at paragraph 5.66 above. This device is proposed on adjacent private property and are not within the scope of my expert parks planning evidence.

## 8. Comment on Supporting Growth Alliance Proposed Conditions

- 8.1. This section of my evidence discusses the proposed conditions that relate to open space outcomes for the project.
- 8.2. The conditions proposed by the requiring authority that relate to open space are the same for each NoR, except where I have otherwise noted below.

### Condition 2: Project Information

- 8.3. The purpose of this condition is to ensure that the public and affected parties are informed about the project and its progress, as well as any changes or updates that may occur during the design and construction phases. The condition requires the requiring authority to provide a website or digital information source that contains relevant information about the project, such as plans, drawings, maps, reports, newsletters, contact details, and feedback



mechanisms.

- 8.4. An issue with the wording of this condition is that it does not specify who is responsible for maintaining or updating the website or digital information source, or how long the website or digital information source will be active for. This could create uncertainty or confusion for the users of the website or digital information source, especially if the information becomes outdated, inaccurate, or inaccessible.
- 8.5. I have recommended an amendment to the condition below that would include more details about responsibilities, maintenance, update, and duration of the website or digital information source:

*(a) A project website, or equivalent virtual information source, shall be established by the requiring authority within 12 months of the date on which this designation is included in the AUP. All directly affected owners and occupiers shall be notified in writing once the website or equivalent information source has been established. The requiring authority shall be responsible for the maintenance and updating of the website or virtual information source, ensuring that information remains current and accurate throughout the duration of the project. The project website or virtual information source shall include these conditions and shall provide information on:*

...

*(c) The website or virtual information source shall remain active for a minimum of five years following project completion, or until all major project activities have concluded, whichever is later, to provide ongoing access to project information and updates.*

#### **Condition 4: Designation Review**

- 8.6. The condition requires the requiring authority to review the extent of the designation after the completion of construction and identify any areas that are no longer needed for the project.
- 8.7. The condition also requires the requiring authority to notify Auckland Council and request the removal of those parts of the designation that are no longer required, in accordance with section 182 of the RMA.

- 8.8. The purpose of the condition is to ensure that any unnecessary encroachment on public or private land is avoided and that the land use rights are restored as soon as possible after the project is finished.
- 8.9. I recommend that the condition is retained, as it is consistent with good planning practice and the principles of the RMA.
- 8.10. I also recommend that the condition is amended to include a timeframe for the notification of Auckland Council, such as within one month of identifying the areas that are no longer required.
- 8.11. This would provide more certainty and clarity for both the requiring authority and Auckland Council, as well as the affected landowners and occupiers. It would also enable the timely processing of the requests and the update of the Auckland Unitary Plan maps.
- 8.12. The specific change I recommend is below:

*(a) The Requiring Authority shall within 6 months of Completion of Construction or as soon as otherwise practicable:*

- (i) review the extent of the designation to identify any areas of designated land that it no longer requires for the on-going operation, maintenance or mitigation of effects of the Project; and*
- (ii) give notice to Auckland Council in accordance with section 182 of the RMA for the removal of those parts of the designation identified above, within one month of identification.*

**Condition 6: Network Utility Operators (Section 176 Approval)**

- 8.13. This condition allows network utility operators to carry out certain activities on their existing infrastructure within the designated land without requiring written consent from the requiring authority.
- 8.14. These activities include operation, maintenance, urgent repair, minor renewal, service connection, and upgrade or replacement of existing utilities. The purpose of this condition is to avoid unnecessary delays or costs for the network utility operators and ensure the continued provision or security of supply of essential services.

- 8.15. I recommend that a similar condition should also apply to Auckland Council as the landowner of open spaces within the designated land, to recognise the need for Auckland Council to maintain and operate these open spaces in the interim period before the construction works start, and following and before any designation areas are removed in accordance with Condition 4.
- 8.16. This would enable Auckland Council to continue to provide open space services and amenities to the public, and to respond to any urgent issues that may arise.
- 8.17. The requiring authority should in evidence respond to this recommendation, and if they agree, offer a suitably worded standalone condition or alternatively an alteration to Condition 6.
- 8.18. I note that in their s92 further information response the requiring authority indicated that they have been engaging with Auckland Council Community Facilities and are considering the inclusion of Council in Condition 6 as suggested in P7. The requiring authority stated that they intend to update the Auckland Council processing team on the outcome of these discussions before the hearing. I acknowledge this response however have heard nothing further as of the time of preparing this evidence and therefore have retained this as a specific recommendation.

#### **Condition 7: Outline Plan**

- 8.19. This condition requires the preparation and submission of outline plans for the project, in accordance with section 176A of the RMA. Outline plans may be submitted in parts or stages, and shall include any relevant management plans to address the effects of the activities or stages of work
- 8.20. The condition includes reference to a number of plans that are relevant to open spaces, including the ULDM, TMP, and OSMP.
- 8.21. I support the condition as proposed.

#### **Condition 8: Management Plans**

- 8.22. This condition is intended to ensure that management plans are prepared and implemented by qualified persons, include a summary of feedback from stakeholders, and allow for flexibility in their development and revision. The

plans must be submitted as part of an Outline Plan under section 176A of the RMA and updated on the Project website for at least five years after the completion of construction.

8.23. Part (a)(vi) of the condition states that any management plan shall be uploaded to the Project website or equivalent virtual information source. However, similar to Condition 2, this does not specify who is responsible for maintaining and updating the website, or how long the content on the website will be active for. This could create confusion or inconsistency in the availability and accessibility of the management plans for the public and other stakeholders. A potential drafting issue with this condition is that it does not provide a clear and enforceable requirement for the ongoing dissemination of the management plans.

8.24. Along with my recommended change to Condition 2, part (a)(vi) should be revised to:

*“Once finalised, be uploaded to the a Project website or equivalent virtual information source, established in accordance with Condition 2.*

8.25. I also consider there to be some ambiguity regarding the interpretation of “material change” as referenced in parts (b)(ii), (b)(iii), and (c) of the condition, as well as the meaning of “sufficient detail” in part (a)(iii). The criteria for determining materiality and the adequacy of detail are not clear, including who holds the deciding authority. To remove any uncertainty, I recommend that the Requiring Authority outline in evidence their interpretations of these terms to ensure clarity and prevent any ambiguity.

### **Condition 12: Urban and Landscape Design Management Plan (ULDMP)**

8.26. This condition requires that a ULDMP be prepared prior to the start of construction for a “Stage of Work”, which means any physical works that require the development of an Outline Plan. The objective of the ULDMP is to integrate the project's permanent works into the surrounding landscape and urban context, and to manage potential adverse landscape and visual effects.

8.27. Mana Whenua and key stakeholders will be invited to participate in the development of the ULDMP. The ULDMP will be prepared in accordance with relevant design guidelines and will provide details on how the project will integrate with the adjacent urban and landscape context, promote inclusive

access and personal safety, and respond to matters identified through the Land Use Integration Process. The ULDMP will also include planting details and maintenance requirements.

8.28. I recommend that part (e) of the condition be amended to include reference to the specific Ngahere plans for Manurewa and Papakura, as well as the applicable Local Board greenway and local paths plans. These plans are relevant to the project's landscape and urban design outcomes and should be considered in the development of the ULDMP. This will ensure that the project aligns with the existing and planned initiatives to enhance the urban forest, biodiversity, connectivity, and amenity values in the project area.

8.29. These can be incorporated as follows:

*(e) The ULDMP shall be prepared in general accordance with:*

...

*(v) Auckland's Urban Ngahere (Forest) Strategy or any subsequent updated version.*

*(vi) Nga Ara O Manurewa | Manurewa Local Paths Plan (2019) or any subsequent updated version*

*(vii) Manurewa Urban Ngahere Action Plan (2022) or any subsequent updated version*

*(viii) Papakura Greenways Local Paths Plan (2016) or any subsequent updated version*

*(ix) Papakura Urban Ngahere Action Plan (2022) or any subsequent updated version*

8.30. I recommend that part (g)(iii) of the condition be amended to specifically include reference to park and open space design and reinstatement.

8.31. This can be incorporated as follows:

*(g) The ULDMP(s) shall include:*

...

*(iii) Landscape and urban design details – that cover the following:*

...

*i. Re-instatement of construction and site compound areas, driveways, accessways and fences.*

*j. Re-instatement of and, where practicable, enhancement of parks and open space.*

8.32. As an aside, an advice note is proposed to accompany this condition that explains that the designation is not intended to be for 'road widening' such that the front yard definition under the Auckland Unitary Plan is modified in relation to it. I question whether this is the most appropriate condition for this advice note.

### **Condition 13: Open Space Management Plan (OSMP)**

8.33. The requiring authority proposes that condition 13 only applies to NoRs 1 and 3.

8.34. The condition refers to Appendix 5, which references only the following open spaces: Alfriston Park (NoR 1), Tadmore Park (NoR 3), Gallaher Park (NoR 3), and Alfriston Park (NoR 3).

8.35. I recommend that the condition and management plan be required for all NoRs and open spaces, regardless of location, size, and condition. This will ultimately serve as the primary management plan for managing effects on parks and recreational assets within the project area.

8.36. Appendix 5 should be amended to list all parks and open spaces that I covered in Section 5.

8.37. Further, I consider that the objective of the OSMP should be broadened, to not only relate to recreational amenity, but open space values generally. The objective should also provide for enhancement where practicable, noting part (c)(ii) of the condition, which provides scope for forward work programmes to be brought forward. The specific changes I recommend are below:

*(c) The objective of the OSMP is to minimise as far as practicable adverse effects on the ~~recreation amenity~~ values and functions of the open spaces listed in Schedule 5 resulting from the Project, while also seeking opportunities for enhancement where practicable. To achieve the objective, the OSMP shall include details of:*

...

8.38. Further, to fairly address maintenance of access and the level of service for open spaces during construction, particularly for areas like Karaka Reserve

and Hingaia Creek Esplanade Reserve that are not currently publicly accessible, I recommend an amendment to parts (c)(i) and (iii) of the condition.

- 8.39. The amendment I propose below would clarify that the measures taken should align with the existing level of public accessibility and service of each open space. This ensures the condition sets realistic expectations and acknowledges the varying degrees of accessibility across different open spaces, thus preventing the imposition of undue obligations on the project.

*(i) how the ongoing operation of and access (including walking and cycling) to those open spaces during construction will be maintained or appropriately managed in accordance with the Construction Traffic Management Plan (Condition 19), taking into account the existing public accessibility of each space;*

...

*(iii) measures to reasonably maintain or manage the existing level of service and accessibility of the affected open space; and*

## 9. Recommendations

- 9.1. I have identified five main areas where the works may affect the existing amenity, function, or character of the open spaces, namely: Central Park Cenotaph, Chisholm Corner, Tadmore Park, Gallaher Park, and Alfriston Park.

- 9.2. In this section, I have included summary recommendations on how the requiring authority could address the concerns raised.

9.2.1. I recommend that the requiring authority address in their evidence the temporary and permanent loss of open space across the Manurewa and Papakura Local Board areas.

9.2.2. I recommend that the requiring authority address in their evidence the design of the proposed works at Central Park Cenotaph and Chisholm Corner, and explore options to avoid or minimise the effects on the heritage features and the open space amenity.

9.2.3. I recommend that the requiring authority consult with relevant stakeholders, such as the local board, RSA, and the public, on the proposed works at Central Park Cenotaph, and seek their feedback on alternative options or design solutions. Preferably this should

occur in advance of a design being finalised for this open space, but at a minimum in accordance with the stakeholder engagement required under Condition 9.

- 9.2.4. I recommend that the requiring authority clarify in their evidence whether they commit to replacing the car parks at Gallaher Park and Tadmore Park on a 1:1 basis, and whether access to the remaining car parks will be maintained during the construction works.
- 9.2.5. I recommend that the requiring authority reconsider the location and alignment of the path within Alfriston Park, to ensure that it follows the natural desire lines of pedestrians and cyclists and does not compromise the functionality of the recreational area.
- 9.2.6. I recommend that the requiring authority provide more detail on how they will manage potential risks associated with the wetland and the playground at Alfriston Park.
- 9.2.7. I recommend that the requiring authority consider whether a pedestrian link between Alfriston Road and Index Place could be provided as part of the mitigation for the physical works at Index Place Reserve.
- 9.2.8. I recommend that conditions 4 (Designation Review) and 8 (Management Plans) be amended to provide more clarity and certainty on the timeframes, criteria, and responsibilities for the implementation and review of the management plans.
- 9.2.9. I recommend that a condition similar to condition 6 (Section 176 Approval) be offered by the requiring authority that would include Auckland Council as the landowner of open spaces within the designated land, and that would allow Auckland Council to carry out operation, maintenance, urgent repair, minor renewal, and upgrade or replacement of existing open space facilities and amenities without requiring written consent from the requiring authority.
- 9.2.10. I recommend that condition 12 (ULDMP) be amended to include reference to the specific Ngahere plans for Manurewa and Papakura, as well as the applicable Local Board greenway and local paths



plans.

9.2.11. I recommend that condition 13 (OSMP) be required for all NoRs and open spaces, regardless of location, size, and condition, and that the objective of the OSMP be broadened to include open space values generally and opportunities for enhancement where practicable in liaison with the landowner.

9.3. The wording for recommended condition changes are contained in Section 8.

Prepared by: Daniel Kinnoch

Date: 07/02/2024



**Auckland Council memorandum (technical specialist report to contribute towards Council's section 42A hearing report)**

28<sup>th</sup> February 2024

To: Cheryl Cleary, Consultant Reporting Planner, Plans and Places, Auckland Council

From: Trent Sunich, Consultant Flood Hazard and Stormwater Technical Specialist

Cc: Joy LaNauze, Senior Policy Planner, Central/South Planning Team Plans and Places

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**Subject: South Future Transport Network (FTN) Notices of Requirement – Stormwater and Flood Hazard Technical Assessment**

## **1.0 Introduction**

My name is Trent Sunich, I hold a Bachelor of Technology (Environmental) which I obtained from the Unitec Institute of Technology in 2001. I have 20 years' plus experience in the field of natural resource management and environmental engineering. My expertise is in integrated catchment management planning, flood hazard assessment, stormwater quality management, and assessing associated development related stormwater effects where previously I have held roles with the Auckland Regional Council and URS New Zealand Limited. I am currently employed by SLR Consulting (formerly 4Sight) as a Principal Environmental Consultant. I have reviewed and reported on the Warkworth to Wellsford motorway project Notice of Requirement on behalf of Healthy Waters who the Auckland Council's stormwater network operator. I have also been the reporting stormwater technical specialist to Plan and Places of the Auckland Council for the proposed private plan changes 48, 49 and 50 and the Drury NoRs 1-5.

My involvement in the project has been from September 2023 where I was commissioned to review the relevant reports for the NoRs, any information requests/responses, and review/assess the relevant submissions culminating in the findings of this memorandum. I attended a project briefing on 14 September 2020 and attended a site visit with other technical specialists on the same day.

In writing this memo, I have reviewed the following documents:

- South Frequent Transit Network, Assessment of Effects on the Environment, October 2023, Version 1.0.
- South Frequent Transit Network, Assessment of Flooding Effects, October 2023, Version 1.0.
- Form 18 for NoRs 1-4.
- General Arrangement Plans for NoRs 1-4.
- Re: Response to request for further information in accordance with section 92 of the Resource Management Act 1991 for the South Frequent Transit Network Project, dated 10 November 2023.

## **2.0 Code of Conduct**

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I

state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

### **3.0 Perceived Conflict of Interest - Declaration**

I note that SLR Consulting recently acquired 4Sight Consulting and that members of the 4Sight (now SLR) planning team have been engaged by Z Energy Limited to prepare submissions on their behalf. I can confirm that I have had no previous contact with people involved in the preparation of submissions in this regard and that I have been engaged to act on behalf of Auckland Council for the purpose of reviewing the notices of requirement as described below. I declare that I have no conflict of interest with the submitters.

### **4.0 Scope and Structure**

This memorandum summarises the findings of my review on behalf of Plans and Places of the Auckland Council for the South Future Transport Network (FTN) Notices of Requirement (the NoRs) which are:

- South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1).
- South Frequent Transit Network: Great South Road (Drury Section) (NoR 2).
- South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3).
- South Frequent Transit Network: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4).

My assessment considers flood hazard and overland flow path effects during construction as well as the long-term effects of operating roads. Where appropriate I have also commented on management of operational stormwater discharges from the project, however this matter is largely out of scope currently and will be subject to future regional plan resource consent applications and assessment reflecting the stormwater management related rule sets in the Auckland Unitary Plan (AUP). Notwithstanding this it is important to consider that suitable land area will be available within the designation to construct and operate the stormwater management devices receiving runoff from the carriageway impervious surfaces.

This memorandum is structured as follows:

- Summary of Key Issues.
- Comment on the Assessment of Effects by Supporting Growth Alliance.
- Review and Assessment of Submissions.
- Comment on the Requiring Authority Proposed Conditions.
- Objectives and Policies
- Conclusions and Recommendations.

## 5.0 Summary of Key Issues

Assessment of flood hazard during construction and post development for each of the NoRs has been documented in the report entitled 'South Frequent Transit Network Assessment of Flooding Effects' ('the Flood Hazard Report').

In the context of constructing and operating each of the NoR routes, the Requiring Authority has concluded that flood hazard effects may include changes to; the flood freeboard to existing habitable buildings; overland flow paths and flood prone areas; flood levels on developable land (in the FUZ); and the ability to access property by residents and emergency vehicles.

### Flood Hazard Assessment

In order to assess these flood hazard effects, a consistent methodology was applied for each NoR route where each step is summarised as follows:

- Desktop assessment to identify potential flooding locations, namely:
  - Existing buildings that are near/within the existing flood plains.
  - Where the Project involves work near stream crossings, flood plains and major overland flow paths.
- Flood modelling of the pre-development terrain using the following:
  - The existing terrain using Maximum Probable Development (MPD).
  - 100-year average recurrence interval (ARI) plus climate change rainfall (2.1° Increase, RCP4.5 or SSP2).
  - 100-year ARI plus climate change rainfall (3.8° increase, SSP3 or RCP8.5).
  - Model results were used to identify flood water levels increases  $\geq 0.05\text{m}$  for the future.
- Inspection of the flood extent maps to identify flooding effects, including:
  - At key cross drainage locations such as culverts and where there are noticeable deep flood levels, consideration was given to flood hazard issues.
  - Properties and buildings with habitable floors showing potential to flooding hazard through flood extent within the existing building footprints.
- A sensitivity analysis to assess the potential impact of climate change on the results.

This assessment focused on whether the designation area is large enough for a future road design to meet the proposed conditions. To date flood modelling has been limited to using the pre-development state only (2.1° and 3.8° climate change scenarios (where applicable)) with an indicative road design and designation layout. The result of this modelling was used to identify areas where the flood hazard is presently a risk and where the designation may need to widen to consider extent for mitigation.

### Risk Assessment

In assessing the flood model results, the Requiring Authority has developed a flood risk rating which was determined using flood depth from the model outputs to identify where there is an existing flood risk (and hence where the proposed project works could exacerbate flooding). Flood risk was assessed using the following criteria and has been used to identify risk to existing properties along with a corresponding risk rating.



Flood depth / land use	Less Vulnerable e.g. open space, rural land (not in FUZ)	Moderately Vulnerable e.g. commercial and industrial properties	Highly Vulnerable e.g. dwellings, educational facilities
<b>Negligible</b> (flood depth < 0.05 m on land and freeboard >0.5m to buildings)			
<b>Low</b> (flood depth 0.05 m to 0.15 m on land and freeboard <0.5m to buildings)			
<b>Moderate</b> (flood depth 0.15 m to 0.5 m on land and No freeboard to buildings)			
<b>High</b> (flood depth > 0.5m on land and No freeboard to buildings)			

### Key Issue Summary

Based on the flood hazard and risk assessment presented in the Flood Hazard Report, A risk rating has been applied to various addresses and properties along the NoR alignment. These risk areas have not been repeated in this report (as they are documented in the Flood Hazard Report), however an example of the information presented is detailed in the following table for each NoR for moderate and high risk ratings. Low risk ratings have not been assessed in the Flood Hazard Report.

Table 1: Example Flood Hazard Issues in the South FTN NoRs

Notice of Requirement	Key Flood Hazard Issues
Great South Rd FTN Upgrade (NoR 1)	NoR 1.1: High Existing and Likely Future Flood Risk Rating at the following addresses: <ul style="list-style-type: none"> <li>• 34 to 39 Great South Road (High)</li> <li>• 55 to 59 Great South Road (High)</li> </ul>
	Bridge upgrade and effects of upstream and downstream flood flows. NoR 1.7: High Existing and Likely Future Flood Risk Rating at the following addresses: <ul style="list-style-type: none"> <li>• 600 Great South Road (High)</li> <li>• 134-136 Great South Road (High)</li> <li>• 135-139 Great South Road (High)</li> </ul>
Great South Rd (Drury Section) (NoR 2)	NoR 2: High Existing and Likely Future Flood Risk Rating at the following address: <ul style="list-style-type: none"> <li>• 263-279 Great South Road (High)</li> </ul>
Weymouth, Alfriston, and Great South Road Upgrades	NoR 3.1: High Existing and Likely Future Flood Risk Rating at the following address: <ul style="list-style-type: none"> <li>• 12-16, 11-15 Weymouth Road (High)</li> </ul>

Notice of Requirement	Key Flood Hazard Issues
(NoR 3)	<ul style="list-style-type: none"> <li>• 233-243 Great South Road (High)</li> <li>• 253-261 Great South Road (High)</li> <li>• 5-7 Alfriston Road (Moderate)</li> </ul>
Porchester and Popes Road Upgrades (NoR 4)	<p>NoR 4.1: High Existing and Likely Future Flood Risk Rating at the following address:</p> <ul style="list-style-type: none"> <li>• 216-224 Alfriston Road, 1-7 Porchester Road (High)</li> <li>• 479, 463-471 Porchester Road (Moderate existing, high future flood risk)</li> </ul>

## 6.0 Comment on the Assessment of Effects by Supporting Growth Alliance

The NoRs are proposed to be constructed and operated in the catchments of Puhinui Creek, Waimahi Creek, Papakura Stream, Pahurehure Inlet, Slippery Creek and Hingaia Stream. In brief, each NoR proposes the widening to existing carriageways, new bridges and the inclusion of additional transport modes using cut and fill techniques. Each NoR will be served by drainage infrastructure owned and operated by the requiring authority generally comprising formed open drains, culverts, bridges, swales, piped reticulation and stormwater management devices such as wetlands.

As was discussed earlier in this memorandum, this assessment focuses on the flood hazard (overland flow and flood plains) as a result of constructing and operating the designated infrastructure. The requiring authority has proposed a suite of stormwater management devices for each NoR route in line with current practice to address the effects of stormwater runoff from the impervious surfaces (e.g. stormwater contaminants, hydrology mitigation, flood peak flow attenuation). This has included provision within each designation boundary to construct and operate the management devices (e.g. treatment and attenuation wetlands). Effects assessment of the stormwater discharges will be assessed at a later date when regional consents are sought for each route and are therefore not assessed in further detail here. Where submissions have been raised with respect to the location of stormwater management devices, I have generally deferred this to the Requiring Authority to respond to as is indicated in Appendix 1 of this memorandum.

### Flood Hazard Assessment

As a result of constructing and operating each NoR route flood hazard effects may include changes to; the flood freeboard to habitable buildings, overland flow paths, the ability to access property by residents and emergency vehicles, the depth of flooding to roads and flooding arising from the blockage of stormwater drainage. In order to understand and assess the potential flood hazard effects, the Requiring Authority has developed risk rating criteria to assess against the respective flood hazard model results.

This risk rating criteria has enabled a consistent method for assessment of flood hazard risk in relation to less vulnerable, moderately vulnerable and highly vulnerable land use types using existing flood hazard model information including assumptions regarding matters such as maximum probable development (MDP) future land use cover and climate change scenarios (2.1 degrees and 3.8 degrees where applicable to that catchment). It is noted the risk rating criteria has been used to inform the NoR application and assessment process across the various projects and does not carry through to risk assessments in the respective NoR conditions proposed by the Requiring Authority.

During pre-lodgement discussions with the Requiring Authority, I queried whether pre and post development scenarios (including the proposed terrain and alignments for each NoR) should have been modelled such as was the case for the Drury NoRs 1-5 which I had a similar role in assessing.

The Requiring Authority indicated that role of the flood hazard assessment at this time is to identify the designation area is sufficient to provide for the alignment construction and operation and any associated works for flood mitigation techniques and stormwater management devices. On balance I agree with the approach and find the use of the risk criteria sufficient to identify the quantum of effect that current exists for various properties (particularly in relation to moderate and high-risk areas), and correspondingly that will exist in the future when detailed design is completed via the proposed conditions of the Outline Plan process. In principle, the detailed design process will also capture flood hazard that has not been identified in the flood hazard report, but may eventuate as a result of matters such as land use change over the coming decades. Notwithstanding this, I have various comments in relation to the proposed conditions later in this report.

The Auckland Region has experienced extreme weather events recently, in some cases beyond the magnitude (rainfall depth/intensity) of what is typically used as a reference rainfall event in relation to site flood risk assessment. Currently the 1% AEP rainfall event (i.e. 1-in-100 chance of occurring in any one year) is embedded in regional and district objective, policy and rule frameworks, including the influence of climate change to accommodate predictions in rainfall intensity and duration. In this case the Rapid Flood Hazard Assessment (RFHA) includes a projected annual average temperature increase by 2090 of 2.1 °C and for the respective catchment models, the more conservative climate change scenario of 3.8 °C. Through the s92 process, I queried whether sensitivity analysis should be completed for a further conservative climate change. The Requiring Authority responded as follows:

*A range of sensitivity assessments can be carried out not limited to rainfall but also to surface roughness, percentage culvert blockage, tailwater conditions, impervious surface/ soil infiltration changes. These sensitivity assessments would be more beneficial at the resource consent phase in understanding the performance of the model and the sensitivity of the design effects. At this stage, (NoR for the designation of a road) assessing a higher flood depth would not lead to the identification of any new properties at risk or any change in condition. Therefore, I propose additional sensitivity not be undertaken until resource consent phase.*

I agree with this response and consider over time flood hazard prediction will continue to evolve through local and national direction as an evidence base is developed in relation to planning for the influence of more extreme rainfall events. The proposed NoR conditions also need to be sufficiently flexible to accommodate a range of model sensitivity scenarios using the best information available at the time the outline plan of works is submitted (including more conservative climate change scenarios, if that eventuates), noting flood hazard prediction and modelling is not an exact science, but rather a tool to assist with decision making and assessment of the NoRs against the applicable objectives and policies in the AUP.

I conclude the assessment methodology presented in the Flood Hazard Report and how the model results have been reported at this stage of the project design at this time is fit for purpose. Further, the findings for each NoR route are suitable to understand the quantum of flood hazard effects, albeit being based on existing flood hazard information and current land forms. This conclusion is reached on the basis that further detailed analysis will be carried out during the detailed design phase should the notices of requirement be confirmed, thereby placing some reliance on the effectiveness of the designation conditions and the outcomes sought in relation to floodplain and overland



flow path flood hazard management. To assist with the implementation of designation condition implementation, I have recommended edits to the NoR conditions in Section 6 of this memorandum with associated commentary outlining why the edits are recommended.

### Flood Hazard Assessment Results Summary and Proposed Mitigation

Overall it is concluded that the potential flood hazard effects are understood and there is provision for mitigation through the performance-based requirements stipulated in the respective NoR conditions, noting I have recommended changes to the conditions in Section 6 of this memorandum. It is anticipated understanding of flood hazard effects will continue to be defined as detailed design progresses for each NoR and will include flexibility to capture the potential for the emergence of new flood hazards (e.g. due to concurrent land use change) while also future proofing an evolving science of flood hazard management and prediction in light of the recent flood events and the realisation that climate change is not static.

As was discussed in the assessment above a component of Flood Hazard Report and its findings was to understand flood hazard features in proximity to the NoR and to demonstrate mitigation options are available. A summary of the mitigation options appropriate to the respective NoR, material to this assessment are listed as follows. In principle, I agree these mitigation options align with good practice in terms of flood hazard and stormwater management, subject to detailed design in the future:

- Keeping the current vertical alignment of the road crests.
- Providing treatment and detention in raingardens for road runoff.
- Providing additional piped drainage, greater inlet capacity or creating a flood storage area in the flood prone areas to prevent property damage.
- Provide additional piped drainage, greater inlet capacity to suit the changed kerb lines.
- Co-operative approach with other agencies, including Waka Kotahi, to achieve equivalent flood management outcomes (e.g. bridge capacities).
- Maintain all channels and avoid replacing with piped drainage. The open channels are important maintain groundwater levels, manage secondary flow paths where overtopping roads and to carry flow where piped networks are blocked/ under capacity.

### Flood Hazard Effects During Construction

The Flood Hazard Report discusses the potential location-specific flood hazard effects associated with constructing the NoR sections. This is based on the type of type of work that is anticipated to be carried out (e.g. culvert and bridge abutment construction, cut and fill activities, diversions). Due to the dynamic nature of construction staging it is not typical practice to assess potential flood hazard in the manner that has been completed for the permanent operational phase of the arterial routes. Therefore, a designation condition has been recommended by the Requiring Authority that a flood hazard assessment during construction (and associated mitigation) is addressed as part of the Construction Environmental Management Plan (CEMP). This proposed approach is considered satisfactory to assess and or mitigate any temporary flood hazard effects associated with the construction activities. No edits are recommended to the CEMP conditions.

## **7.0 Submissions**

Of the submissions received, a number raised flood hazard management concerns and were all relate to permanent effects following development of the designations. The

number of submissions per topic are set out in Table 1 below. Relevant submissions and their assessment have been tabulated in Appendix 1.

Topic	Notice of Requirement	Number of submissions
Permanent (operational) effects	NoR 1	4
	NoR 2	0
	NoR 3	3
	NoR 4	7

The Manurewa Local Board seeks clarity on the impact of stormwater and landscape response at Gallaher Park. I also comment on the stormwater part in Appendix 1.

### 8.0 Comment on SGA Proposed Conditions

I have reviewed the conditions and have the following recommendations indicated in underlined (additions), with deletions (~~strike through~~). The recommended edits are common to all NoR condition sets.

I am also providing technical input into reporting by Plans and Places on the Pukekohe Transport Network Project. I have made similar condition recommendations in my reporting on that project and have subsequently discussed conditions with Requiring Authority representatives. The timing of this reporting has not enabled the outcomes of those discussions to be captured here, however could be updated in the hearing when evidence is presented by the Requiring Authority flood hazard specialist.

#### 3. Land Use Integration Process.

The Requiring Authority shall set up a Land use Integration Process for the period between confirmation of the designation and the Start of Construction. The purpose of this process is to encourage and facilitate the integration of master planning and land use development activity on land directly affected or adjacent to the designation. To achieve this purpose:

- a. Within twelve (12) months of the date on which this designation is included in the AUP, the Requiring Authority shall include the contact details of a nominated contact on the project website (or equivalent information source) required to be established by Condition (2)(a)(iii).
- b. The nominated contact shall be the main point of contact for a Developer or Development Agency wanting to work with the Requiring Authority to integrate their development plans or master planning with the designation.
- c. At any time prior to the Start of Construction, the nominated contact will be available to engage with a Developer or Development Agency for the purpose of:
  - (i) responding to requests made to the Requiring Authority for information regarding design details that could assist with land use integration; and
  - (ii) receiving information from a Developer or Development Agency regarding master planning or land development details that could assist with land use integration
- d. Information requested or provided under Condition 3(c) above may include but not be limited to the following matters:
  - (i) design details including but not limited to:
    - A. boundary treatment (e.g. the use of retaining walls or batter slopes)
    - B. the horizontal and vertical alignment of the road (levels);
    - C. potential locations for mid-block crossings;

- D. integration of stormwater infrastructure and/or flood hazard management; and
- E. how to access traffic noise modelling contours to inform adjacent development.

#### 14. Flood Hazard

- a. The Project shall be designed to achieve the following flood risk outcomes:
  - (i) ~~no increase in flood levels in a 1% AEP event for existing authorised habitable, community, commercial, and/or industrial floors that are already subject to flooding or have a freeboard less than 150mm;~~
  - (ii) ~~no more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard of over 150mm;~~
  - (iii) ~~no increase in 1% AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding;~~
  - (iv) ~~no more than a 10% reduction in freeboard in a 1% AEP event for existing authorised community, commercial, industrial and network utility building floors;~~
  - (ii) Maintain the minimum freeboard requirement as set out in the Auckland Code of Practice for Land Development for Subdivision Chapter 4: Stormwater Version 3.0, January 2022 or any update or replacement of that Code;
  - (iii) no increase of more than 50mm in flood level in a 1% AEP event on land zoned for urban or future urban development where there is no existing dwelling; No increase in flood plain extent unless a site-specific flood assessment is provided with the Outline Plan that demonstrates there is no reduction in developable land in an urban zone or the Future Urban Zone;
  - (iv) new overland flow paths shall be diverted away from habitable floors and discharge to a suitable location with no increase in flood levels in a 1% AEP event downstream;
  - (v) no loss in conveyance capacity or change in alignment of existing overland flow paths, unless provided by other means;
  - (vi) no new flood prone areas; and
  - (vii) no more than a 10% average increase ~~detrimental change~~ of flood hazard (defined as flow depth times velocity) classification for main vehicle and pedestrian access to authorised habitable dwellings existing at the time the Outline Plan is submitted. The assessment of flood hazard shall be undertaken for the 10% and 1% AEP rainfall events.
- b. Compliance with this condition (a) above shall be demonstrated in the Outline Plan developed in consultation with the Auckland Council Healthy Waters (or its equivalent), which shall include flood modelling of the pre-Project and post-Project ~~400-year ARI~~ 10% and 1% AEP flood levels (for Maximum Probable Development land use and including climate change).
- c. Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.

Commentary On Condition Edits:

#### Land Use Integration Process Condition:

- d.(i)D: Clarification of the scope to include consideration of flood hazard management matters.

### Flood Hazard Condition:

- (i): Simplified condition outcomes with regard to buildings that are already subject to flooding and included other building types, with consequential deletion of (ii), (iii) and (iv). Propose removing metrics around specific numbers (e.g. 150mm) as may become obsolete in the future.
- (ii): Referencing code of practice freeboard requirement, including futureproofing minimum freeboards as the document evolves.
- (iii): Remove 50mm metric as may be a blunt instrument depending as floodplain behaviour may vary across the notices of requirement due to floodplain topography types (e.g. confined floodplain vs flood plains that are flat and open). Enable site specific assessment to determine suitability of flood level increase vs land use type.
- (iv) and (v): Introduction of overland flow specific conditions for new and existing overland flow paths to clarify an expectation around their management. (iv) could be a duplication of assessment that will be required with respect to future stormwater discharge consent application requirements but I have conservatively added this as an outline plan outcome to clarify expectations around overland flow path management versus flood plains, notwithstanding they are often managed concurrently.
- (vii): The use of the 10% metric has limited relativity (e.g.10% increase at some sites will have a more significant effect than at other sites where there is no flood hazard). Current flood hazard approaches (e.g. Australian Disaster Resilience Handbook Collection – Flood Hazards Guideline 7-3) provides flood hazard curves related to the risk to people and vehicles, hence the introduction of a classification metric to assess and identify risk.
- (b): AEP vs ARI terminology. It is unclear why the Requiring Authority is using both, as typically AEP is the reference metric Suggest AEP condition with references earlier in the condition. Addition of reference to consult with Healthy Waters is self-explanatory as the body who hold regional flood hazard modelling information.

## **9.0 Objectives and Policies**

The natural hazards and flooding related Auckland Unitary Plan objectives and policies relevant to the NoRs are listed as follows:

- B10 Environmental Risk:
  - B10.2.1 Objectives (1) – (6).
  - B10.2.2 Policies (3), (4), (5), (6) (7) (8) and (12).
- E36 Natural Hazards and Flooding:
  - E36.2 Objectives (1) – (6)
  - E36.3 Policies (1), (3), (4), (18), (20), (21), (23), (27), (29), (30) and (35).

Consistent with Chapter B10, the Requiring Authority has identified and assessed current flood risk associated with the NoR and have used tools such as flood hazard mapping and the application of risk ratings to identify negligible, low, medium and high risk areas. This has led to decisions around the extent of the designation required and the type of mitigation methods proposed to be employed in the future subject to detailed design and associated post -development flood hazard assessment with the designation alignments in place.

The Requiring Authority have also sought to incorporate the influence of climate change projections consistent with Policy B10.2.2, including the more conservative scenario of 3.8 degrees where applicable to that catchment. This is also consistent with the precautionary approach to natural hazard risk management and the Requiring Authority has indicated this has/will also include other sensitivity assessments (e.g. surface roughness, percentage culvert blockage, tailwater conditions, impervious surface/ soil

infiltration changes) to assess the response of the infrastructure and surrounding land uses to low probability but high potential impact rainfall events.

Although post development flood risk has not be assessed as part of the NoRs, the quantum of flood risk hazard is understood (with the information currently available) such that there is pathway through the proposed designation conditions for mitigation. In consultation with Healthy Waters, I have also recommended condition edits as is discussed in the above section.

Further assessment is required at the Outline Plan stage during detailed design of the NoR works contributing to overall consistency with the B10 and E36 objectives and policies.

## **10.0 Conclusions and recommendations**

The assessment in this memorandum does not identify any reasons to not confirm the NORs, subject to appropriate flood hazard mitigation conditions. The flood hazard assessment of the NoR finds that the NoR can be confirmed subject to recommended conditions, for the following reasons:

- The Requiring Authority has used a fit for purpose flood hazard risk assessment method using a series of steps to establish and assign an operational risk rating.
- The flood hazard modelling accounts for the effects of climate change by adjusting for changes in temperature and rainfall patterns in accordance with MfE guidance.
- The flood hazard modelling and reporting of the results is suitable to inform the quantum of flood hazard that exists and whether the designation extent is suitable to implement mitigation practices though the performance related flood hazard designation conditions. Further flood hazard modelling will be required as part of the Outline Plan including modelling of post project landforms and infrastructure.
- Subject to the imposition of the designation conditions the proposal is not inconsistent with the flood hazard related objectives and policies in the Auckland Unitary Plan.



Trent Sunich  
Consultant Stormwater Technical Specialist  
28<sup>th</sup> February 2024

**Appendix 1: Relevant Submission Summary and Assessment**

**NoR 1: Great South Road FTN Upgrade**

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
23	Hansaben Patel 64 and 66 Great South Road Manurewa and 1 Grande Vue Road Manurewa	In particular, the Owner is concerned that increases in impervious surface area and associated changes to flows have not been adequately assessed.	Amendments to the Notice of Requirement, including by way of conditions to address the Owner's concerns.	I have reviewed the Flood Hazard Report and the Flood Plain in the Auckland Council's Geomaps viewer. The submitters property is not currently subject to flood hazard. Should this change in the future, flood hazard resulting from the construction within the designation will be mitigated via the flood hazard condition set.
30	Z Energy Limited 166 Great South Road	The permanent road corridor upgrades and designation boundary encroach beyond a number of critical site features including access points, landscaping, signage, carwash entrance, water tanks and stormwater infrastructure including the interceptors. The designation boundary also runs within the forecourt and canopy.	Decline the NoR or amend it to respond to the concerns of the submitter.	Effects on the inner working of sites including stormwater infrastructure across the NoR affected by the designation boundary are a matter for the Requiring Authority to respond to.
32, 33	Manurewa Business Association Incorporated Southmall Manurewa	Notes a lack of clarity around existing utilities including drainage being upgraded.	Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	This is a matter to be addressed during the detailed design phase in line with the performance requirements listed in the flood hazard condition set.

**NoR 3: Weymouth, Alfriston, and Great South Road Upgrades**

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
16, 17	Manurewa Business Association Incorporated Southmall Manurewa	Notes a lack of clarity around existing utilities including drainage being upgraded.	Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.	This is a matter to be addressed during the detailed design phase in line with the performance requirements listed in the flood hazard condition set.
38	Z Energy Limited Corner of Alfriston Road and Great South Road	The permanent road corridor upgrades and designation boundary encroach beyond a number of critical site features including access points, landscaping, signage, carwash entrance, water tanks and stormwater infrastructure including the interceptors. The designation boundary also runs within the forecourt and canopy.	Decline the NoR or amend it to respond to the concerns of the submitter.	Effects on the inner working of sites including stormwater infrastructure across the NoR affected by the designation boundary are a matter for the Requiring Authority to respond to.

On December 7, 2023, the Manurewa Local Board under resolution number MR/2023/219 provided Local Board Views on the South FTN NoRs. The Manurewa Local Board seeks clarity on the impact of stormwater and landscape response at Gallaher Park. I note the concern of the Board and invite the Requiring Authority to comment on this matter in evidence at the hearing. It appears from the design plans that works are not proposed in Gallaher Park. The floodplain traverses the adjacent site (7 Alfriston Road) where the wetland is proposed to be constructed.

**NoR 4: Porchester and Popes Road Upgrades**

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
5	Dianne and Neville Smith	<p>The submitter is strongly against the designating of the front paddock of their property at 52 Popes Road for a storm water detention pond. Taking land for a stormwater pond will adversely affect the christmas tree farm operated at the property; and will prevent plans for developing the land when it is rezoned from Future Urban.</p>	<p>Seeks that if the stormwater retention pond is absolutely necessary that it be located to the rear of 52 Popes Road, under the transmission lines.</p>	<p>I support the functionality of the proposed attenuation device and I do not have a view on its exact location until further detailed design can be completed on route design and the associated requirements to manage stormwater runoff through the regional consent process to authorise the stormwater discharges.</p> <p>This is a matter for the Requiring Authority to respond to at the hearing with respect to this site selection and the location of the wetland on the site.</p>
		<p>The submitter considers locating a footpath next to a 1m deep drain is dangerous for pedestrians. If there is to be no widening of the bridge or repositioning of the drain then there is no need for the submitter's land to be taken for road widening. The creek needs to be widened and straightened for a long-term solution to enable growth in the area, as it was over-flowing during the Auckland Floods in early 2023.</p>	<p>Suggests that open drain on Porchester Road be piped under the round to the southwestern side of the bridge and an outlet feed directly into the creek, avoiding the need for the stormwater to flow under the bridge. The creek needs to be widened and straightened.</p>	<p>The query raised around pedestrian safety is valid and is a matter for the Requiring Authority to respond to at the hearing, in terms of relevant codes of practice and safety in design.</p> <p>The NoR does not currently include works to the stream alignment and thus is out of scope of this assessment.</p>



Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
14	BJ Wallace Trust and SJ Wallace Trust 296 Porchester Road	<p>The proposal to use the front yard of 296 Porchester Road as temporary construction area conflicts with the consented stormwater solution for the full development of 296 Porchester Road.</p> <p>The Porchester and Popes Road design needs to ensure that no new stormwater flow will enter the site. The Q100 flow should continue to be conveyed over Popes Road to the overland flow path to the north of 296 Porchester Road.</p>	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.	<p>Effects on the inner working of sites including stormwater infrastructure across the NoR affected by the designation boundary are a matter for the Requiring Authority to respond to including selection of the site for temporary construction purposes. I note the Supporting Growth Alliance letter dated 9 November 2023 reduces the proposed designation extent on the submitter's property by ~3,600m<sup>2</sup> which appears cognisant to the matters raised in this submission point around stormwater management and the consented development extent.</p> <p>I have recommended edits to the flood hazard and overland flow management conditions consistent with the outcome sought by the submitter.</p>
15	Zabeel Investments Limited 354 Porchester Road	The Assessment of Flooding Effects Report by SGA provides no specific assessment for Porchester Road between the Papakura stream bridge and Popes Road bridge despite there being a 200 cumec flow at that point, a large portion of which flows across onto the subject site.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road	There does not appear to be specific reference in the Flood Hazard Report to this property. A review of the Flood Hazard Report Figure 28 indicates the submitters site would be classed in the high flood risk category (already subject to flooding) as is the case with the examples presented in Table 1

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
				of this report. It would be helpful for the Requiring Authority to confirm this matter at the hearing, and identify potential mitigation options if required.

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
		Leaving the status quo on the western side of Porchester Road by moving the works to the eastern side of Porchester Road will avoid adversely affecting flood levels, conveyance of overland flows and floor level freeboards at 354 Porchester Road.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road	As is the case with high-risk category properties, flood hazard is not proposed to be exacerbated through implementation of the performance-based flood hazard conditions.
		Conveyance and treatment of stormwater on Popes Road and the west side of Porchester Road by swales in unnecessary due to the Council's new wetland.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road	Porchester Road may be classed as High Contaminant Generating >5000vpd under Chapter E9 of the AUP thus requiring water quality treatment at source which is typical across the region. A matter for the Requiring Authority to comment on and confirm at the hearing.
		The LUIP proposed condition does not require the Requiring Authority to provide flood modelling updates to adjoining development.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road	Post development flood hazard modelling using surrounding landform at that time is a component of the Flood Hazard condition. I have also recommended a minor edit to the LUIP condition to add flood hazard management as a matter to consider.
		The project should not enable any increase in flood hazard on any sites.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road	The flood hazard conditions align with this submission point, particularly for properties already subject to flood risk. I have also recommended condition edits.
16, 17	Alda Investments	The project should not enable any increase in flood	The submitter seeks that the	The flood hazard conditions

Submitter No.	Name	Submission Point/Issue Raised	Relief Sought	Technical Assessment
	Limited D E Nakhle Investment Trust 164-166 Porchester Road	hazard on any sites.	NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed	align with this submission point, particularly for properties already subject to flood risk. I have also recommended condition edits.
		There is no assurance that flooding or ponding of the carpark for the apartments proposed at 164-166 Porchester Road will be avoided. It is essential the health and safety of vulnerable residents is assured.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed	There is a flood hazard condition (condition 14) that manages risk associated with vehicle and pedestrian egress during flood events. I have recommended an edit to align with a recognised risk classification system.
18	Simon and Julie Fleming 3 Sheriff Place	The submitter is concerned with increased potential for flooding affecting property stormwater drain.	Seeks remedies to their concerns and that the submitter's property at 3 Sheriff Place not be devalued or damaged and their quality of life not be affected.	As is the case with high-risk category properties, flood hazard is not proposed to be exacerbated through implementation of the performance-based flood hazard conditions.
21	Danielle Evans 311 Porchester Road	The submitter is concerned the proposed stormwater pipe will stop at the boundary of their property at 311 Porchester Road, Takanini, changing course and moving to a surface flow conveyance along the existing road front with the fill batter, raising a concern about surface flooding.	Seeks that the underground storm water pipe continue on the same path, rather than change line and become an open drain.	Notwithstanding the flood hazard related performance conditions, it would be helpful for the Requiring Authority to comment at the hearing on the transition from a piped system to an open channel and how this would function during high flow rainfall events.

## Technical memorandum for South Frequent Transit Network

### Notices of requirement for works 1 to 4: Built Heritage

To: Cheryl Cleary, Consultant Planner to Auckland Council

Joy LaNauze, Senior Policy Planner, Auckland Council

From: Dan Windwood, Senior Built Heritage Specialist, Built Heritage Implementation, Heritage Unit, Auckland Council

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#### 1. Application details

**Applicant's name:** Auckland Transport (AT), Waka Kotahi (WK)  
**Application number:** NoRs South FTN 1-4  
**Activity type:** Various  
**Site address:** Manurewa, Takaanini, Papakura, Drury

#### 2. Introduction

##### Qualifications and relevant experience

- 2.1. My name is Daniel Spencer Windwood, and I am a Senior Built Heritage Specialist at Auckland Council.
- 2.2. I am a Senior Built Heritage Specialist in the Built Heritage Implementation Team in the Heritage Unit at Auckland Council. I have held this post since August 2018. In this role I provide professional specialist advice on development affecting scheduled historic heritage places relating to built heritage and special character.
- 2.3. I hold a Bachelor of Arts (Honours) degree in Archaeology (International) from the University of Leicester in the United Kingdom, graduating in 2004. I specialised in landscape archaeology and studies of historic buildings, including historical industrial sites and landscapes, with a focus on the last two hundred years. As part of my degree, I spent a year studying historical archaeology and cultural heritage management at Flinders University of South Australia, Adelaide. In 2005 I graduated with a Master of Arts degree in Landscape Studies from the University of Leicester. My Master's degree focused on the analysis and management of historic landscapes.
- 2.4. I have over fourteen years professional experience as an urban planner and heritage specialist. This includes over seven years in New Zealand, including periods working as a heritage specialist for Wellington City Council and Dunedin City Council. I have also worked for the Historic Sites team for the Yukon Territory Government of Canada as the Historic Sites Registrar.
- 2.5. My UK experience comprises over six years, predominantly working in local government as a heritage specialist within the urban planning process. This included stints as a

building conservation officer and as a county archaeologist, advising on development directly and indirectly affecting the historic environment including buildings, townscapes, archaeological sites and larger cultural landscapes. I have also worked as a heritage consultant in the private sector, where among other projects I authored the heritage assessment for the successful 2014 scheme for Battersea Power Station, London.

- 2.6. I am fully accredited as a Member of the Institute of Historic Building Conservation ([www.ihbc.org.uk](http://www.ihbc.org.uk)). The IHBC is the professional body for building conservation practitioners and historic environment experts working in the United Kingdom, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all. Full Members have demonstrated their skills, knowledge and experience in built and historic environment conservation as a multidisciplinary and interdisciplinary practice, in line with the Institute's membership standards and criteria and the international models on which they are based.
- 2.7. I have visited the Notice of Requirement (NoR) site on several occasions, and I am generally familiar with the area.

### **Expert Witness Code of Conduct**

- 2.8. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. Other than where I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

### **3. Overview and scope of technical memorandum**

- 3.1. The Applicant, in its capacity as a requiring authority, has given notice to the Council of its requirement for designations to develop, construct, operate and maintain the necessary structures and facilities for the South FTN NoR, which is comprised of four NoR:
- NoR 1 Great South Road FTN Upgrade (NoR 1);
  - NoR 2 Great South Road Upgrade (Drury Section) (NoR 2);
  - NoR 3 Takaanini FTN – Weymouth Road, Alfriston Road, and Great South Road Upgrades (NoR 3); and
  - NoR 4 Porchester Road and Popes Road Upgrades (NoR 4).
- 3.2. I have reviewed the documentation provided for this Nor, specifically the assessment of archaeological and heritage effects prepared by Hayley Glover at CFG Heritage Ltd and the response provided by the Requiring Authority to s.92 requests. My comments apply

solely to the built heritage elements of this assessment and does not comment on notable trees, archaeological heritage or cultural matters.

- 3.3. The assessment supplied has been carried out by an archaeological specialist and unfortunately, the applicant has not followed the advice provided both prior to lodgement and at s92 stage to provide a more detailed built heritage report by an appropriate specialist, similar to those provided by the Supporting Growth Alliance for the North West Rapid Transit Network Notices of Requirements. Consequently, the level of detail provided does not enable a comprehensive review of the potential impacts of the proposal on the built heritage values within its vicinity.
- 3.4. I have carried out a desk-based review of the sites identified in the assessment provided and of the sites adjacent to the NoR. The proposal has the potential to both directly and indirectly affect the built heritage values of historic buildings both scheduled and unscheduled in the area. Direct effects are those where historic fabric is physically altered or damaged, and indirect effects are where the experienced setting of historic places is altered through changes to the surrounding environment.
- 3.5. I have identified the following sites where additional information should be provided at HHMP stage. It should be noted that this list is not exhaustive and that a more detailed built heritage study preceding the HHMP may identify further buildings of significance that are surviving local exemplars of historic architectural forms that mark the urban development of the area.

Location	Contained within assessment?	Site	Comments
NOR1	Table 10.1	Papakura Old Central School  Scheduled on AUPOP #2830	Cat B scheduled historic heritage place – gates and wall may be directly or indirectly affected by works. Due to their later construction date from the old school building the relocation of these features within the scheduled extent of place has the potential to be managed through the HHMP process, providing that it can be adequately demonstrated that harm is avoided or mitigated.
NOR1	Table 10.1	World War I memorial  Scheduled on AUPOP #2801	Cat B scheduled historic heritage place – memorial may be directly or indirectly affected by works. The overlap of the scheduled extent of place with the NoR appears to be a mapping error where the extent of place extends only on the southeastern corner beyond the walled surrounds of the memorial and on to the path. This issue is discussed in more detail later in my report. The management of the impact of adjacent construction effects and the final design of the setting of the memorial has the

Location	Contained within assessment?	Site	Comments
			potential to be managed through the HHMP process, providing that it can be adequately demonstrated that harm is avoided or mitigated.
NOR1	No	Papakura Presbyterian Church complex  Scheduled on AUPOP #2800	Cat B scheduled historic heritage place –may be directly or indirectly affected by the impact of adjacent construction effects and the final design of its setting. HHMP needs to demonstrate how harm is avoided or mitigated.
NOR1	No	Papakura public cemetery, 298 Great South Road, Papakura	Unscheduled site of potential historical and social significance. Its historic landscape design values (differing from its archaeological values) should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR1	Table 10.1	355, 359 and 361 Great South Road (Moderne & Spanish Mission)	Unscheduled houses of similar architectural styles, dating from the inter war period. Some limited modifications. Potentially significant for the development of Papakura, should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR1	No	154 Great South Road, Takanini	Unscheduled flat fronted villa. Potentially significant for the development of area, should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR1	No	323A Great South Road, Manurewa	Unscheduled pair of twentieth century shops. Potentially significant for the development of area, should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR1	No	9 Great South Road,	Unscheduled collection of twentieth century shops on corner site.



Location	Contained within assessment?	Site	Comments
		Manurewa	Potentially significant for the development of area, should be investigated further prior to submission an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR1	No	33 Great South Road, Manurewa	Unscheduled modernist house, potentially of significance architecturally, should be investigated further prior to submission an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR2	Table 10.1	257 Great South Road (bungalow)	Unscheduled bungalow, may have some historical significance for the development of the area, should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated..
NOR3	Table 10.1	11 Alfriston Road (Moderne?)	Unscheduled building, further investigation recommended prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR3	No	18 Weymouth Road, Manurewa	Unscheduled California bungalow, replacement windows but otherwise unmodified. Further investigation recommended prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.
NOR3	No	49 Alfriston Road, Manurewa (Villa)	Unscheduled single bay timber villa. Likely to be of historical significance for the development of the area, should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated. Also likely to pre-date 1900, and an archaeological site.
NOR4	Table 10.1	279 & 281 Porchester Road	Unscheduled houses of similar architectural styles, dating from the inter war period. Some limited modifications.

Location	Contained within assessment?	Site	Comments
		(bungalow and cottage-bungalow)	Potentially significant for the development of Takanini, should be investigated further prior to submission of an HHMP in order to demonstrate how harm is avoided or mitigated.

#### 4. Statutory considerations

##### Auckland Unitary Plan (Operative in Part)

4.1. I have examined the Project against the following relevant provisions of the AUP(OIP):

- a. Chapter D17 Historic Heritage Overlay and Schedule 14.1 Historic Heritage
- b. Chapter E11 Regional Land Disturbance
- c. B5 Regional Policy Statement for Historic Heritage, and
- d. Chapter E26 Infrastructure.

4.2. Overall, I consider the Project to be consistent with historic heritage provisions of the AUP(OIP).

#### 5. Submissions Received

##### Heritage New Zealand Pouhere Taonga

5.1. I have reviewed the submissions from Heritage New Zealand Pouhere Taonga (HNZPT) for NoRs 1 to 4. I disagree with their statement:

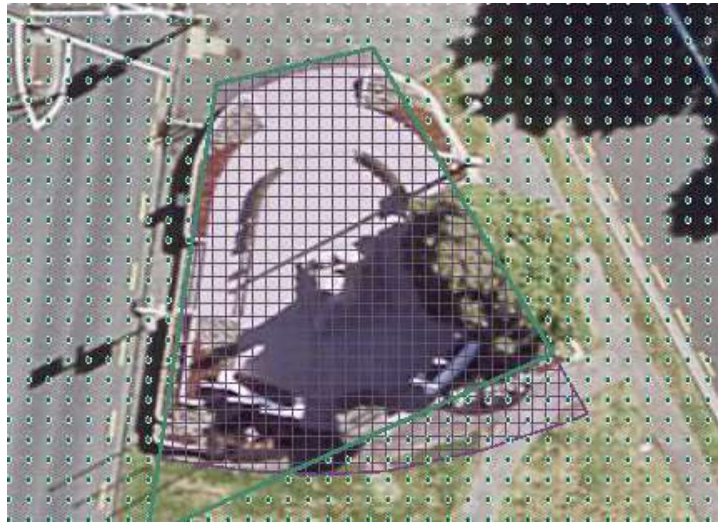
*“The lack of assessment and mitigation of the built heritage values being provided through the NoR 1 process when it is clearly expressed through the application that it is intended for there to be modification and or the destruction of features within the extents of the Papakura Old Central School (R12/1154 and 14.1 Schedule #02830) and the Papakura/Karaka WWI Memorial (14.1 Schedule #02801 and CHI#16003).*

*In particular, that the stone gates of the School may potentially to be destroyed; and there are to be modifications to the exterior extent of the Memorial. Accordingly, as these effects are already known of, the mitigation of these effects should not be addressed through the HHMP. It is not appropriate to rely on the future HHMP process, particularly when it is stated in the AEE that the direct impacts of NoR 1 on historic heritage extents will be “avoided by the concept design” of the designation.”*

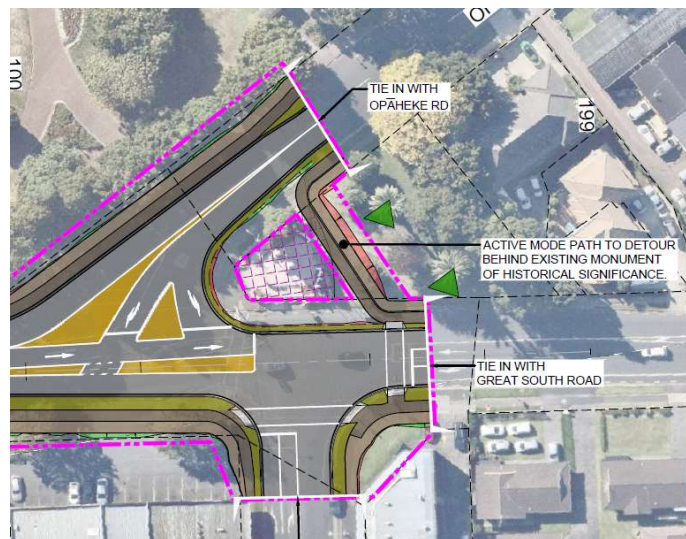
5.2. I consider that the gates and wall of the Papakura Old Central School have a lesser historical and social significance than the former school building due to their later date of construction in the 1920s combined with a lack of features typically found on memorial

school gates that were built to commemorate former students who had died during the Great War. I also consider that their relocation within the scheduled extent of place of the school building could be potentially carried out in a manner that enabled the retention of historic fabric while also respecting their relationship with the urban landscape that forms their immediate setting. As a result, I consider that the use of a Historic Heritage Management Plan (HHMP) is an appropriate way to manage these features of the site.

- 5.3. I also consider that the overlap of the scheduled extent of place of the Papakura/Karaka WWI Memorial and NoR 1 can be adequately managed through the use of a HHMP, as the area in question appears to contain only the grass verge and concrete pavement beyond the walls and plantings that delineate the war memorial formal surrounds, as shown below.



*Extract from Auckland Council Geomaps – green dotted area is NoR 1, purpled hatched area is the extent of place of entry #02801 on Schedule 14.1 of the AUP (OIP)*



*Extract from General Arrangement Plan-NoR 1 Sheet 5. Crosshatched area is identified as 'historic heritage'; Proposed cut battering areas shown in red.*

- 5.4. The insertion of an active mode pathway behind the memorial does not harm in principle its parklike landscaped setting as it does not introduce any significant structures that would appear directly behind the memorial on approach from the north. It also avoids the loss of the trees to the south that contribute positively to its setting. Any further potential for harm to the setting of the memorial through the installation of light poles and other similar features can be avoided or mitigated through the use of an HHMP.
- 5.5. I therefore consider that the proposal is not likely to alter the war memorial's structures but is more likely to harm it through construction damage such as plant strike or vibration. These potential sources of harm, in my view, can be adequately avoided or mitigated through the use of an HHMP. Council's consultant parks planner, Daniel Kinnoch, addresses the effects on open space in his technical expert memo and I defer to his expertise in relation to those effects.

For these reasons, I disagree with Heritage New Zealand Pohere Taonga's submission.

## 6. Conclusion

- 6.1. I consider that the Project will result in limited risk from a built heritage perspective, and that proposed condition 24 is appropriate, requiring the production of a Historic Heritage Management Plan (HHMP) to protect historic heritage and to remedy and mitigate any residual effects as far as practicable. To achieve the objective, the HHMP shall identify any direct and indirect adverse effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures. Submission of a draft version of the HHMP is expected once design details are finalised (condition 24 requires the HHMP to be prepared in consultation with Council, HNZPT and Mana Whenua), to ensure that all parties can provide input prior to certification and will enable the development of a more detailed study of the built heritage values of the area.
- 6.2. I have assessed the effects of the proposal on built heritage, the magnitude of these effects, and whether adverse effects are avoided, remedied, mitigated, minimised or offset. Overall, I consider the effects on built heritage to be less than minor.
- 6.3. There is no National Policy Statement on Historic Heritage to assess this application against.
- 6.4. I support the application provided adequate mitigation occurs for any adverse effects on built heritage. The condition offered in each NoR should be attached to any granted NoR and will ensure the effects on historic heritage will be less than minor.



Dan Windwood BA (Hons) MA IHBC  
Senior Built Heritage Specialist

14 February 2024

## Technical memorandum

### Notices of Requirement for works NOR1 to NOR4: Historic heritage, archaeology.

#### South Frequent Transport Network [FTN]

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#### 1. Introduction

- 1.1 My name is Myfanwy May Eaves, and I am the Senior Specialist: Archaeology at Auckland Council (the Council).
- 1.2 I have a Bachelor of Arts (BA) and Master of Arts (MA) (Hons) from Auckland University in Anthropology and Chinese. I also have a Master of Social Sciences (MSocSci) in Industrial Archaeology from the University of Birmingham, United Kingdom.
- 1.3 I have been in this role for ten (10) years. I provide information and advice on request and provide direction and assistance to the Council's compliance and monitoring officers for consented works. I work with NZ Police and Heritage NZ when potential archaeological discoveries are made on sites with no previously recorded historic heritage site (exposure can be from natural events or consented activity). I provide technical reviews for resource consent applications and Notices of Requirement across the Auckland region. I also provide advice and subject matter assessments to Council officers on matters relating to the care and protection of historic heritage across the Auckland region.
- 1.4 Previously, I have studied and worked in New Zealand and overseas in several locations: Australia, mainland China, England and Wales. I have worked as a museum collections manager in Auckland (Auckland Museum) and Australia (Sydney, PHM/MAAS). I am skilled in the identification, recording and provision of conservation advice for excavated materials and sites, with a speciality in industrial sites and materials. I have also organised logistics for the movement of objects and exhibitions around Australia and internationally. I have a high level of understanding of and professional experience in the physical and documentary protection and enhancement of both sites and objects particularly in conjunction with indigenous communities.
- 1.5 For this application, my role was to undertake an assessment of the lodged documents, identify any information gaps, prepare evidence and provide advice to the processing planners as needed on my subject matter field, historic heritage.
- 1.6 I attended the project briefing and site visit for the South FTN NoR with other subject matter experts on 14 September 2023.
- 1.7 I was unable to attend the SGA briefing on proposed conditions for the South FTN NoR on 13 December 2023, however a copy of the *Conditions Workshop* file was provided to me; I have reviewed this.
- 1.8 This memo is my expert technical evidence on the South FTN NoR (4) and submissions relevant to my area of expertise, historic heritage, and archaeology.

## 1.9 Code of Conduct

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## 2. Scope and Structure

The Requiring Authority has provided an assessment by a Subject Matter Expert in Volume 4 of the NOR documents. This provides an analysis of risk to the known historic heritage resource either within or adjacent to the location.<sup>1</sup> Comment is provided for each area of works, including the potential for construction and operation effects of this proposal on the historic heritage resource.

The methodology used for this assessment is stated and follows normal professional practice. After data analysis from acknowledged professional sources (e.g. soils, vegetation, archives) field surveys were undertaken. These tested the data accuracy through site relocation (or not) and provided a landscape analysis of the historic heritage resource visible today. Surveys were limited to public land and those safest to traverse - it is noted that neither test pitting nor probing (invasive testing) could be used due to the likelihood of subsurface utilities. These constraints are acknowledged and not uncommon.

This methodology is standard professional practice to ascertain if an area, place, building or archaeological site might be affected in any way by any part of the proposal.

### 2.1 Subject Matter

This memo relates to the South FTN Notices of Requirement by Auckland Transport, which consist of:

- South Frequent Transit Network [FTN]: Great South Road FTN Upgrade (NoR 1)
- South FTN: Great South Road (Drury Section) (NoR 2)
- South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)
- South FTN: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4)

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<sup>1</sup> *Assessment of Archaeological and Heritage Effects* October 2023 version 1. Prepared by Hayley Glover for Te Tupu Ngātahi Supporting Growth, Waka Kotahi (NZTA) and Auckland Transport (AT).

2.2 I have reviewed the relevant reports contained within the NoR, as well as any related submissions, for any effects on historic heritage as stated in the interpretation and application section (Part 1 section 2) of the RMA 1991:

**historic heritage—**

*(a) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand’s history and cultures, deriving from any of the following qualities:*

- (i) archaeological:*
- (ii) architectural:*
- (iii) cultural:*
- (iv) historic:*
- (v) scientific:*
- (vi) technological; and*

*(b) includes—*

- (i) historic sites, structures, places, and areas; and*
- (ii) archaeological sites; and*
- (iii) sites of significance to Māori, including wāhi tapu; and*
- (iv) surroundings associated with the natural and physical resources.*

2.3 This memo assesses historic heritage and archaeological sites in the proposed extent of works area only. The report does not discuss or comment on cultural matters as these are matters for Mana Whenua only to comment on.

**3. Summary of key issues**

3.1 The following is a brief overview of the issues I address in this memo. Built Heritage and Arboreal matters will be addressed separately by respective SME colleagues, however, where the presence of such features in an archaeological landscape is relevant (as history), they will be identified as contributors to historic heritage values at that place.

3.2 The following table (Table 1) provides a response to the SME assessment report provided by the Requiring Authority.

*Table 1: Historic heritage sites and issue response for South FTN NoRs*

Notice of Requirement	Key Historic Heritage	Issue / clarification of my understanding (Omitted if no issue)
NOR 1: Great South Rod	i. Potential unrecorded archaeological sites (pre-1900), particularly around Ōtuwairoa / Slippery Creek.  ii. Two NZAA archaeological sites (demolished buildings) R12/1159 and R12/1161 (now <u>AUP ID 2801, Category B scheduled WW1 Memorial (CHI16003)</u> )  iii. <u>1926 Memorial gates AUP ID 02830</u> . No NZAA status but included in AUP OP Schedule as the 1877 <u>school as Category B</u> .	<p><b>No issue:</b> HHMP (monitoring and recoding) considered appropriate, whether or not an HNZPTA authority is in place.</p> <p><b>Clarification:</b> Two statutory protection mechanisms present – AUP Schedule 14.1 plus HNZPTAct.</p>
Notice of Requirement	Key Historic Heritage	Issue / clarification of my understanding (Omitted if no issue)
NOR 1: Great South Road	iv. <u>1877 Papakura Old School and extent of place. AUP ID 02830</u> while the NZAA record of R12/1154 is for school only.  v. Mileposts (various).  vi. CHI12924 WW1 Memorial oak behind soldier.  vii. Chisholm's Corner (flagpole, poppy and earth mounds, milestone site).	<p><b>Clarification:</b> Two statutory protection mechanisms present – AUP Schedule 14.1 plus HNZPTAct.</p> <p>ii. AUP advises that where primary features are not identified (Category B sites) then <u>the entire site is protected</u>. This is also of note for iii.</p> <p>iii. Unless gazetted, post-1900 sites have no HNZPTA protection.</p> <p>v. Mileposts are considered to have potential for educational interpretation (only).<sup>2</sup></p> <p>vi. Any tree [oak] that contributes to this place is considered to contribute to the overall heritage value of the place. For example, Kirk's Bush.</p> <p>vii. These two mounds (and plaques) were legacy council initiatives to reflect community-held historical values for this corner. They are considered to indicate potential for educational interpretation only.</p>

<sup>2</sup> In 2016, the Heritage Unit researched these and found many anomalies and that all were likely reproductions. Three mileposts remain on AUP OP Schedule 14.1, and these are currently under review. In 2016, the only milepost location considered most likely was the one at 88 Great South Road, Manurewa, outside a business. (CHI16843, AUP ID1487). Council discussion with the business in 2022 resulted in the removal of the sign as it was identified as a facsimile and erected by the AA.



<b>NOR 2:</b> Great South Road (Drury Section)	Potential unrecorded archaeological sites (pre-1900)	<b>No issue:</b> HHMP (monitoring and recoding) considered appropriate, whether or not an HNZPTA authority is in place.
<b>NOR 3:</b> Takaanini FTN – Weymouth, Alfriston, and Great South Roads Upgrades	NZAA R11/3477 site of former Manurewa station.	<b>No issue:</b> HHMP (monitoring and recoding) considered appropriate, whether or not an HNZPTA authority is in place.
<b>NOR 4:</b> Takaanini FTN – Porchester and Popes Roads Upgrades	Potential unrecorded archaeological sites (pre-1900), NZAA R11/2078 Flax mill NZAA R11/2077 homestead post-1900	<b>No issue:</b> HHMP (monitoring and recoding) considered appropriate, whether or not an HNZPTA authority is in place. <b>Clarification:</b> R11/2077 is identified as post-1900 building and even though it has been given an NZAA number. Unlikely to meet the criteria for gazettal.

**4. Overall comment on the *Assessment of Archaeological and Heritage Effects* October 2023 Glover (for SGA)**

- 4.1 Overall, I consider the assessment and statements made by Glover are suitable at this stage. I agree with statements made regarding individually identified sites, and note that at this time, further research is required for some, particularly for post-1900 built historic heritage.
- 4.2 I consider the methodology used allows competent discussion of the potential effects of the construction and operation of the individual NoRs. The overall effects of the proposed designation on the historic heritage (archaeology) resource are considered minimal if suitable conditions are included with the decision.
- 4.3 The only potential matter of uncertainty could arise in NOR4 where a post-1900 residence has received a NZAA<sup>3</sup> site record number. Ordinarily, the database moderators reject a record like this one. On review of the site record form, I found it to be a in generalised entry of over 20 archaeological sites which had been identified in 2000 by Clough and Baquié.<sup>4</sup> At that time it was standard to “include everything” to allow for later clarification; this will happen as part of this NOR process. Therefore, I do not consider this an issue as further research prior to any earthworks should clarify the heritage status of this building.
- 4.4 On this basis I did not make a s92 request for further information as I considered pre-1900 matters were addressed sufficiently. I am still of this opinion.

**5. Submissions**

- 5.1 I have reviewed all submissions for the four NOR. I consider only two submitters have relevance to historic heritage matters and discuss them below.

<sup>3</sup> New Zealand Archaeological Association database, ArchSite.

<sup>4</sup> *A cultural heritage investigation for the Takanini Structure Plan. Unpublished report for the Papakura District Council and listed in references in the Glover report.*

- 5.2 The first submission I address is that from Heritage NZ Pouhere Taonga, in NOR1 submission number 21. On HNZPT's behalf, Ms Morris opposes NOR1 in full.
- 5.3 In section 8 of the submission, she lists the places discussed above (at 3.2) and considers the level of research inadequate.
- 5.4 I consider Hayley Glover's assessment adheres to current accepted format and methodology for historic heritage assessments as applied to major infrastructure projects in this country. She has considered the potential effects, both construction and operation, to the historic heritage resource at all locations as far as possible. A HHMP is advised to create an outline methodology which will direct the identification, avoidance, and mitigation of historic heritage.
- 5.5 I note the HNZPT submission (item 14) is supportive of the HHMP condition generally and supports the Outline Plan [OP] process. I note that a separate process, that of archaeological authority application, is usually timed for the OP process or later and not the investigative works which may inform the final design.
- 5.6 HNZPT is concerned about the minimal assessment and mitigation of the built heritage values for both the heritage extents of the Papakura Old Central School AUP ID02830 (R12/1154) and the Papakura/Karaka WWI Memorial AUP ID02801. I concur with this opinion (item 15) and had, during the early lodgment stage of this application, requested the inclusion in Council's team of experts assessing the NoR of my Built Heritage colleague, Dan Windwood. He will comment further on these matters.
- 5.7 I note HNZPT concern (item 16) regarding the masonry wall to the west side of the school (facing Great South Road) and the exterior extent of the adjacent WW1 Memorial. As both are post-1900 in construction, Council appreciates the support from HNZPT in the protection and enhancement of historic heritage under the RMA 1991.
- 5.8 As the HHMP will be certified by Council prior to any works commencing, it is entirely appropriate to expect a specific methodology for to be presented in this document (item 16) as the HHMP is a document that responds to the effects of the construction process. Any activity that affects a scheduled item must be detailed in the HHMP, the type of effect noted and described, and the results of any effects specifically address - if the scheduled item will be avoided (in the final design), protected, or mitigation is proposed for any damage. It is also expected that the associated heritage landscape will be fully remediated. Condition 24 requires the HHMP to be prepared in consultation with Council, HNZPT and Mana Whenua) and we look forward to HNZPT support in the final content of the HHMP.
- 5.9 I concur with Ms Morris in submission paragraph 13, that a "group of trees" has not been assessed for historic heritage values. It is difficult to identify specific 'notable trees' in question, however I understand the statement to mean trees described in both scheduled (Schedule 10 AUP OIP) Notable Trees and other trees within the extents of place of items in Schedule 14 Historic Heritage, of the AUP.
- 5.10 The assessment provided by the Requiring Authority assesses all trees along the proposed route.<sup>5</sup> The arboreal assessment is provided by their SME, Mr Webb and I note that he prefers retention of all trees (Section 4).

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<sup>5</sup> *Assessment of Arboricultural Effects*, Version 1.0 by Craig Webb, October 2023, Volume 4 of the application.

5.11 It is critical to note that, as with all archaeological and built heritage reporting to date for this proposal (page 14 of his report):

*In all cases, arboricultural input into the development of the final design and construction methodologies for road corridor upgrade works is a crucial factor affecting the outcome in terms of the adverse effects on trees.*

5.12 I will not comment further on the heritage value of trees and defer to my colleague Mr West Fynn.

5.13 I note that the effect on the heritage values of trees may need comment by the Requiring Authority in evidence at the hearing.

5.14 In response to the HNZPT submission, my opinion is that that both Ms Glover and Mr Webb have advised caution in their separate assessments, and both seek further investigation and research to occur to inform the final design. Both parties state that they are assessing risks to their relevant subject matter based on the *proposed* design, and that prior to the commencement of any earthworks or vegetation clearance, even for investigative works to confirm the final design route, both specialists wish to undertake additional research. This additional research will inform the final design and therefore should enable avoidance of risk to historic heritage features, places or sites.

5.15 The second set of submissions I discuss involves three submissions from the same submitter, all dealing with the same matter:

- NOR1 submission #26, is on behalf of Parks and Community Facilities, Auckland Council, authored by Bianka Griffiths. The concerns expressed in NOR 1 are reiterated in;
- NOR 2 (number 10, effects on a waterway) and,
- NOR 3 (number 34, open space and housing for the elderly).

None of these topics is part of my subject matter expertise, however, the broader scope of the three submissions is directed at the topic of public open space *with or without identified historic heritage features*.

5.16 The identification and protection of both recorded and unrecorded historic heritage items is my expertise area and my concerns shadow those of Ms Griffiths, being the temporary use and/or permanent removal of public open space from the public realm and the potential of permanent loss of this open space, to the control and use by the Requiring Authority; all without any mitigation offered.

5.17 I have recent professional experience with the *loss of historic heritage* through the cumulative creep of road designations claiming private property. Prior to enactment for the designation, the heritage features continue to contribute to the heritage landscape and public open space. At the time of this memo the decision is awaited on the 2023 application for NOR Airport to Botany.<sup>6</sup> These items, one scheduled group of trees and a scheduled Flowering gum, will be destroyed, not avoided or protected, for a cycleway

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<sup>6</sup> AUP Schedule item ID01469 Cambria House (A\*) and the trees on Schedule 10 Notable trees ID1514. associated with this heritage property. Also, Scheduled tree ID1526, Flowering gum, on the corner of Puhinui Rd and Vision Place.

along Puhinui Road.<sup>7</sup> Mitigation is offered as new landscaping and revegetation; neither of these will replace the loss to the historic heritage landscape values.

- 5.14 Lastly, item 17 of the HNZPT submission directs the requirement for further assessment of the school (which is to be avoided by the project)<sup>8</sup> and the WW1 memorial, a post-1900 scheduled item. HNZPT concerns regarding these scheduled items is noted.

## **6. Comment on SGA Proposed Conditions.**

- 6.1 Condition 24, Historic Heritage, is offered in each condition set for each NOR; four in total.
- 6.2 It requires the production of a Historic Heritage Management Plan (HHMP) to protect historic heritage and to remedy and mitigate any residual effects as far as practicable. To achieve the objective, the HHMP shall identify any direct and indirect adverse effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures.
- 6.3 The HHMP is a requirement for the management of effects to the historic heritage resource under the RMA 1991. It is different to other management plans produced to comply with OPW requirements<sup>9</sup> as well as any document that may be required by a third party, in this instance, an Archaeological Management Plan (or similar) as part the application process for an archaeological authority.
- 6.4 I consider the Condition 24 to be appropriate to the management of effects to historic heritage under the RMA 1991. Submission of a draft version of the HHMP is expected once design details are finalised, in accordance with condition 24, to ensure that all parties can provide input prior to certification; certification is required prior to the commencement of any earthworks.

## **7. Recommendations**

- 7.1 I have assessed the effects of the proposal on the historic heritage resource, the magnitude of these effects, and whether adverse effects are avoided / remedied / mitigated / minimised / offset. Overall, I consider the effects on historic heritage to be minor or less than minor.
- 7.2 There is no National Policy Statement on Historic Heritage to assess this application against.
- 7.3 In summary, I support the NOR provided adequate mitigation occurs for any adverse effects on the historic heritage resource. The condition offered in each NOR (Condition 24, HHMP) should be attached to any granted NOR and will ensure the effects on historic heritage will be minor.

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<sup>7</sup> <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=165> being Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport).

<sup>8</sup> Section 5.2.1.1 page 23 of the Glover assessment.

<sup>9</sup> Noted in Condition 7.

**Signed:**



**9 February 2024**



16/2/2024

# Memo

To: Cheryl Cleary – Consultant Planner  
From: West Fynn – Senior Heritage Arborist, Heritage Department, Auckland Council  
Reference: South Frequent Transport Network NOR with possible adverse effects on various notable trees within the proposed designation.

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## 1.0 Qualifications and Experience

My name is West Fynn and I am the Senior Heritage Arborist in the Heritage Department of Council. My qualifications are a BSc Forest Management and HND Forest Management.

My relevant experience includes four years at Waitakere City Council as a Resource Consents Arborist; 11 years at Auckland Council as Senior Heritage Arborist; and over 9 years working in the forestry and arboriculture industries including as a climbing arborist.

## 2.0 Code of Conduct

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this memo and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason, and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## 3.0 Proposal Summary

The proposal is the South Frequent Transit Network Notice of Requirement (South FTN NoR) which is comprised of four individual notices of requirement:

- South FTN NoR 1: Great South Road FTN Upgrade
- South FTN NoR 2: Great South Road Upgrade (Drury Section)
- South FTN NoR 3: Takanini FTN – Weymouth, Alfriston, and Great South Road Upgrades
- South FTN NoR 4: Porchester and Popes Road Upgrades.

The works within the NoR are proposed for road widening and multi-use lanes, such as cycling and bus, throughout the route. The NoR is for route protection.

#### 4.0 Scope of Technical Memo

In drafting this memo, I have reviewed the following documents:

- a. South Frequent Transit Network Assessment of Effects on the Environment, by Te Tupu Ngātahi, dated 13 October 2023
- b. South FTN NoRs 1-4 Form 18, dated 11 October 2023: Proposed condition 27 Tree Management Plan (TMP) and Schedule 3 and Proposed condition 24 Historic Heritage Management Plan (HHMP)
- c. South FTN General Arrangement Plan – NoR 1, dated 13 October 2023
- d. South FTN General Arrangement Plan – NoR 2, dated 13 October 2023
- e. South FTN General Arrangement Plan – NoR 3, dated 13 October 2023
- f. South FTN General Arrangement Plan – NoR 4, dated 13 October 2023
- g. South Frequent Transit Network Assessment of Aboricultural Effects dated 13 October 2023, and Appendix B
- h. South Frequent Transit Network Assessment of Archaeological and Heritage Effects
- i. Submission made by Heritage New Zealand Pouhere Taonga (NZHPT) to the South FTN NoRs

Comments provided in this memo only relate to trees covered within heritage overlay sites and notable trees where afforded protection under the AUP for those which are both publicly and privately owned.

In terms of other trees and their contributions to overall tree and vegetation cover, publicly owned trees, overall street amenity and ecological values and any impacts on those then such aspects are covered by more relevant specialists/officers assessing those areas.

This memo provides comment on the proposed works in the South FTN in relation to the notable trees listed in Table 1 below, which are all trees in Schedule 10 of the Auckland Unitary Plan: Operative in Part (AUP):

**Table 1** Notable Trees potentially affected by the South FTN NoR (extracted from Schedule 10, AUP)

ID	Botanical Name	Common Name	Number of Trees	Location/Street Address	Locality	Legal Description
1664	Araucaria heterophylla	Norfolk Island Pine	1	Great South Road 18	Manurewa	Pt Lot 2 DP 14114
2189	Eucalyptus spp	Gum	1	Liverpool Street (road reserve near intersection with Great South Road)	Papakura	
2227	Phoenix canariensis	Phoenix Palm	1	Great South Road 355	Papakura	Lot 10 DP 18831



ID	Botanical Name	Common Name	Number of Trees	Location/Street Address	Locality	Legal Description
2190	Prumnopitys ferrugitea, Dacrydium cupressinum	Miro, Rimu	2	Butterworth Avenue (road reserve on intersection of Great South Road)	Papakura	
2209	Eucalyptus phoenicea	Scarlet Gums	Group	Great South Road 298 (Cemetery frontage)	Papakura	Allotment 24 SECT 10 VILL OF Papakura
2218	Podocarpus totara	Totara	7	Great South Road 365-367	Papakura	Lot 1 DP 143607

In addition, there are trees situated at the corner of Wood Street and Great South Road that potentially affected by the works that are within the historic heritage overlay, under Schedule 14.1 of the AUP, as shown in Figure 1 below. It is worth noting that these trees are not afforded protected status as they are not specifically identified in Schedule 14 Schedule of Historic Heritage of the AUP. Schedule 14 Schedule of Historic Heritage of the AUP includes the scheduled historic heritage places as set out in Table 2 below:

**Table 2** Extract of Schedule 14 Historic Heritage Places

ID	Place Name and/or Description	Verified Location	Verified Legal Description	Category	Primary Feature	Heritage Values	Extent of Place	Exclusions
02830	Papakura Old Central School (former)	Central Park Reserve 57R Wood Street, Papakura	Allot 205 Sec 11 Village Papakura	8	Building	A, B, G	Refer to planning maps	Interior of building(s)
02831	Papakura Courthouse and lockup (former)	59R Wood Street, Papakura	Allot 224 Sec 11 Village of Papakura; Allot 227 Sec 11 Village of Papakura	8	Courthouse, lockup	A, F	Refer to planning maps	Interior of building(s)

**Figure 1** Extent of Historic Heritage Overlay and Notable Tree, Corner Wood Street and Great South Road, Papakura (Source: Council GIS)



The purple hatched area in Figure 1 indicates the historic heritage overlay area on the corner of Wood Road and the Green Triangle shows the notable Oak tree not included in the Requiring Authority’s Arborist Assessment. The Oak tree is scheduled in Schedule 14, as set out in Table 3 below:

Table 3 Oak Tree in Schedule 14 AUP

ID	Botanical Name	Common Name	Number of Trees	Location/Street Address	Locality	Legal Description
2188	Quercus spp.	Oak (Memorial)	1	Wood Street 57R (reserve – Central Park Reserve)	Papakura	Allot 205 Sec 11 VII Papakura

Oak trees were regularly planted after the world wars to represent fallen soldiers who then were seen to be represented by that tree and overlooking their children and grandchildren growing up and playing in the school or park they were adjacent. Also there were 150 Oak trees from Kew Gardens that were distributed by the AA to various schools

**5.0 Arboricultural Comments**

The Requiring Authority’s Arboricultural report did not mention the rules under Section D13 Notable Trees Overlay of the AUP that are relevant in addition to the rules under Section E for notable trees though both aspects were identified in the Assessment of Environmental Effects. Rules in D13 relate to standards for permitted tree trimming or alteration and work within the protected root zone, and consents required for work that does not meet the standards and for removal of Notable trees.

The supporting AEE and Arboricultural assessments for this NoR are very much higher level, at this stage, with an indicative route and areas marked included but there are no specifics relating to effects on notable trees and vegetation such as definitively stating that they are to be removed or retained (rather a desire to retain them wherever possible), quantifying the extent of pruning that may be necessary, or detailing the exacting nature of any earthworks, retaining walls, roadworks, services and similar, or the proximity of those works to the subject trees. Equally, there are no detailed site plans, showing such designs and road layouts.

Whilst it can be appreciated that those details are to be worked through in the detailed design stage, and covered by the proposed Tree Management Plan, nearer the time, it means that it is not possible to make a complete and accurate assessment on the possible adverse effects that those trees may experience or tolerate and the resultant knock-on effects to amenity, eco-services and environmental effects on those trees.

At this stage there is insufficient information, in terms of the actual distance of encroachment of proposed works to the notable trees and the exact nature of those works in terms of the potential effects on those trees and how they can be managed. Stating that issues will be addressed under a Tree Management Plan is too vague and does not allow for a full and considered assessment.

Of particular concern would be notable trees that are in very close proximity to the boundaries of the NoR and the edge of the road reserve and footpaths as these trees are more likely to be adversely affected by excavations, construction and new infrastructure such as for hard surfaces for footpaths, cycleways and bus stops or road realignments and crossing widenings.

Examples of these are the Gum tree on Liverpool Street, the Flowering Gum trees outside of the cemetery and the Totara group on the corner of Beach Road and Great South Road, all of which are very close to the road reserve and in the last instance could possibly require some moderate to heavy pruning for high sided buses for example which could significantly reduce their amenity and health

In the case of the Flowering Gum trees that front the Cemetery, these can be seen as well established in the 1959 image below (Figure 2).

In my opinion these trees are approximately 200 years old and as such these trees can be from the establishment of the Cemetery and may have been planted to represent fallen soldiers from WWI or even planted before that. They are currently in less than ideal health and therefore not highly tolerant of disturbances to their roots and growing environments. They are also older than anyone living and so no one will remember this site prior to the establishment of these trees and they are as such an integral part of the character of the area and not readily replaced/mitigated.

**Figure 2** Flowering Gum trees that front the Cemetery (Source: 1959 aerial image from Auckland Council's GIS)



It was rightly pointed out in the Requiring Authority's arborist assessment, that mature trees cannot be readily adequately mitigated through replanting of smaller new trees which are of lesser stature. This does not also account for all of the other amenity, environmental and eco-services that mature trees offer to any area that are so much more significant than immature trees. Mature trees are associated with historic site uses and, on a more general level, all larger and mature trees afford a sense of scale and maturity/history to sites and streetscapes by the very nature of their size and age.

The submission made by HNZPT to the NoR is concerned that individual and groups of trees that are Notable Trees in Schedule 10 of the AUP or identified in the Cultural Heritage Inventory (CHI) may be impacted and that the effects of the project on the heritage values of these trees has not been assessed.

I note that the Requiring Authority's Assessment of Archaeological and Heritage Effects (section 5.1 and Table 5-1) says that 14 trees listed in the CHI with potential heritage values in NoR 1 are "the subject of a separate Assessment of Aboricultural Effects". However, the Requiring Authority's Assessment of Aboricultural Effects does not identify the heritage values of trees and does not assess the potential adverse effects of the proposed works on those heritage values.

The two most relevant proposed conditions that may address effects on the heritage values of trees are proposed conditions 24 Historic Heritage Management Plan (HHMP) and proposed condition 27 Tree Management Plan.

The Tree Management Plan in proposed condition 27 is limited to the trees listed in Schedule 3 of the proposed conditions. Trees that have been missed in the Requiring Authority's assessment of Aboricultural Effects won't be included in that Schedule.

The HHMP required by proposed condition is written to relate to “historic heritage sites” and “historic heritage places”. It is not apparent whether this HHMP would address effects on trees with heritage values, particularly given those values have not been identified.

It is worth noting that trees and vegetation may be within a heritage overlay site or have a Cultural Heritage Inventory (CHI) number associated with them. So they can be associated with historic use of a site and area or even have genuine heritage values, but that does not mean that they are afforded protection under either the AUP heritage overlay or as notable trees. It is only where trees that are specifically identified in the AUP under either Schedule 14.1: Schedule of Historic Heritage or Schedule 10: Notable Tree Schedule that they are afforded protection in either regard. They may be protected by means of another overlay other than heritage or notable tree. Regardless of whether consents would be required under the provisions of the AUP for the removal or alteration of trees with heritage values, the Requiring Authority should include identification of the heritage values of trees that may be adversely affected by the proposed works as a part of their identification of ‘the receiving environment’. They should also then provide an assessment of how those identified heritage values of trees may be adversely affected by the proposed works in the NoR. I also consider the Requiring Authority should then identify the measures to ensure that adverse effects on the heritage values of trees are avoided, remedied or mitigated to the greatest extent that is practicable. As noted above, I do not think it is clear that Proposed Conditions 24 HHMP and 27 TMP will appropriately manage the potential adverse effects of the NoR on the heritage values of trees. I consider these are matters that need to be addressed by the Requiring Authority in evidence at the hearing.

## **6.0 Conclusion**

I appreciate the need and desire to improve the transport infrastructure, throughout the proposed NoR designated area, for multimodal transport. However, in my professional opinion this should not be at the expense of the environment and history of the area.

In my professional opinion the detailed design stage and tree management plan, needs to ensure, wherever practicable, that all notable trees are to be retained, pruning and works within their protected root zones are such that the form and structure of their canopies and the roots and growing environments for those trees are not disturbed, and with appropriate methodologies and control measures then the proposal could be readily supported. It is only at that time and with detailed information that a thorough assessment of the effects on notable and heritage trees could be accurately identified and quantified.

Given the question marks over the identification and assessment of trees with heritage values in the NoR, I suggest that the Requiring Authority provide evidence on these matters at the hearing.

West Fynn  
Senior Heritage Arborist  
Auckland Council

19 February 2024



# Arboricultural Memorandum

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**Prepared for:** Cheryl Cleary  
Consultant Reporting Planner

**Prepared by:** Leon Saxon  
027 495 7221  
leon@arborlab.co.nz

**Date:** 20 February 2024

**Re:** Arboricultural Assessment of 4 NOR for the  
South Frequent Transit Network

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## 1. Introduction

- 1.1 Auckland Transport have lodged a package of four Notices of Requirement, referred to as the South Frequent Transit Network (South FTN). The Notices of Requirement (NOR) are to designate land for the future construction, operation and maintenance of transport infrastructure in the Manurewa, Takaanini, Papakura and Drury areas of Auckland. A full description of the proposal is provided in the information package submitted.
- 1.2 This memorandum is provided as specialist arboricultural advice for the planners preparing the s42a report for the four NOR.
- 1.3 In preparing this memorandum, the following documents have been reviewed:
  - South FTN – Assessment of Environmental Effects (**AEE**), 13 October 2023
  - South FTN – NoRs 1-4 Form 18, 13 October 2023
  - South FTN – Assessment of Arboricultural Effects, 13 October 2023
  - South FTN – General Arrangement Plan – NoR 1, Final for lodgement, 13 October 2023
  - South FTN – General Arrangement Plan – NoR 2, Final for lodgement, 13 October 2023
  - South FTN – General Arrangement Plan – NoR 3, Final for lodgement, 13 October 2023
  - South FTN – General Arrangement Plan – NoR 4, Final for lodgement, 3 October 2023



- Section 92 further information response dated 10 November 2023 (**Section 92 Response**) including its Attachments; and
- Submissions received on the NoRs application.

1.4 Whilst reviewing those documents, I also reviewed each of the relevant general arrangement plans for each of the four NOR.

1.5 I also attended the project briefing at the Te Tupu Nga Tahī offices and the project-wide site visit on the 14<sup>th</sup> of September 2023.

## 2. Qualifications and Experience

2.1 My full name is Leon Saxon.

2.2 I am a senior consultant arborist employed by Arborlab Ltd, 76D Paul Matthews Road, Albany, Auckland 0632.

2.3 Arborlab is one of New Zealand's leading green space asset management specialists. One of its services to provide arboriculture advice relating to all aspects of tree management from practical arboriculture and legal government processes to complex risk analysis and assessment and providing expert witness services.

2.4 I have been employed by Arborlab since March 2016. Part of my responsibilities is to assess, provide specialist input and prepare arboricultural reports to support resource consent applications for large infrastructure projects.

2.5 I hold a Diploma in Arboriculture from Wintec, the Waikato Institute of Technology. I am also a registered user of the Quantified Tree Risk Assessment System and a qualified International Society of Arboriculture Tree Risk Assessor.

2.6 I have over 25 years' experience in arboriculture in the arborist field including approximately 10 years as a practical arborist undertaking pruning/felling/planting. I spent six years working for Auckland Council as an arborist in the Resource Consents and Compliance Department (North) and have spent the past 10 years specialising in consultancy.

2.7 Since 2016, I have provided specialist input to resource consent applications on a consultancy basis to the Auckland Council Consents and Compliance Department as an employee of Arborlab.

2.8 I also have experience in providing expert evidence in relation to major roading projects (Auckland's Eastern Busway) and cycle paths/shared paths (Glen Innes to Tamaki Drive Shared Path and Te Whāu Shared Path).





- 2.9 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving my oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area of expertise.

### 3. Subject Matter

- 3.1 This memorandum relates to the arboricultural aspects of the South FTN Notices of Requirement by Auckland Transport, which consists of four NOR as follows:

NOR1 – South Frequent Transit Network: Great South Road FTN Upgrade

NOR2 – South Frequent Transit Network: Great South Road Upgrade (Drury Section)

NOR3 – Takaanini FTN: Weymouth, Alfriston and Great South Road Upgrades

NOR4 – Takaanini FTN – Porchester Road and Popes Road Upgrades

### 4. Summary of Key Arboricultural Issues

- 4.1 The land that the proposed designations cover are predominantly existing roads and adjoining residential zoned properties. Within residential zones, only rules for trees listed in Schedule 10 of the AUP(OP) as Notable trees apply. Generally, no other District Plan rules for trees apply for residential zoned properties in the project area. There are also trees located within Open Space zoned land which are affected or potentially affected by construction.
- 4.2 The most significant confirmed adverse effect relates to the removal of existing street trees located within the road reserve. The removal of these trees is predominantly proposed to be mitigated through replacement planting. The details of the replacement planting are proposed to be confirmed at the detailed design stage, through the compilation of a Tree Management Plan and Urban Landscape Design Management Plan.
- 4.3 Potential for adverse effects to protected trees also exists in the form of damage to retained trees, including notable trees during construction. These adverse effects are proposed to be mitigated/minimised through the compilation and implementation of a Tree Management Plan (TMP) at the detailed design stage.
- 4.4 The AEE for the NoR identifies in Table 10-1 and section 10.5.2 that the NoR will have positive effects through the potential for an increase in tree canopy cover and improved quality of trees in the public realm through street tree planting. These positive effects are proposed to be achieved through the TMP and the Urban Landscape Design Management Plan at the detailed design stage.



## 5. Relevant Auckland Unitary Plan Rules – Vegetation

- 5.1 I have reviewed the rules that have been set out in Table 3-1 and Table 3-2 of the submitted Assessment of Arboricultural Effects. I concur that the rules that have been outlined are relevant to the proposal and are the correct planning mechanism with regards to the Notice of Requirement.

## 6. Comment on SGA Arboricultural Assessment

- 6.1 The SGA arboricultural assessment report is considered to have utilised suitable, industry standard methodologies for obtaining the relevant arboricultural data to inform the assessment of effects. The information provided is considered to be sufficient to allow an informed assessment.

## 7. Comments on the Assessment of Arboricultural Effects

### NOR 1

- 7.1 This NOR is for the Great South Road FTN project and covers eight specific areas of the project. The arboricultural assessment titles the eight NoR1 areas at section 5 as:

- Great South Road / Browns Road / Orams Road
- Great South Road / Mahia Road
- Great South Road / Taka Street / Walter Stevens Drive
- Great South Road / Subway Road
- Great South Road / Wellington Street
- Great South Road / Beach Road
- GSR / Park Estate Road
- Slippery Creek Road

#### Great South Road / Browns Road / Orams Road

- 7.2 The SGA arboricultural assessment identifies 13 street trees, 1 scheduled notable Norfolk Island pine tree, 2 street tree groups and one tree group within open-space zoned land within Anderson Park.



- 7.3 I support that the trees within the reserve at Anderson Park (Tree Group 6) have been avoided, with the submitted plans showing that the road does not get widened beyond the existing kerb in this location. The trees include mostly native, mature trees, including pōhutukawa, tōtara and karaka. Works within the root zones of trees within the park are anticipated in association with an upgrade to active mode transport (foot/cycle path). Potential adverse effects resulting from such works can be mitigated through detailed design and the TMP.
- 7.4 The SGA assessment identifies 13 Queen Palms situated sporadically along Great South Road within roadside berms. The trees are identified in Schedule A1 in the Assessment assumptions column as “Within footprint of works and likely construction requirements – remove”. The Assessment states (5.1.2.1) that transplantation may be a viable option, as palms generally make easy transplant candidates”. It is noted that Queen within other NOR are not recommended to be transplanted. While I agree that palms make for easy transplants in general, the location of the palms within road reserve could make transplanting more complex due to the likely presence of underground utilities. While transplanting can be considered during the compilation of the TMP, it should not be considered as a highly likely scenario.

#### Great South Road / Mahia Road

- 7.5 Two Queen palms are located within this area which likely require removal. I concur that any adverse effects resulting from the removal of these trees would not be significant and would be limited to amenity value effects.

#### Great South Road / Taka Street / Walter Stevens Drive

- 7.6 Nine trees are identified within the road reserve within this area. The most significant trees in this area are Tree 57 and Tree 58, two standalone tulip trees (*Liriodendron tulipifera*). A wide grass berm is identified on the plans with a footpath and cycleway against the boundary of the designation. The arboricultural report identifies Tree 57 as likely requiring removal and Tree 58 as likely requiring works within the root zone. The trees are good quality mature specimens, and during detailed design and drafting of the TMP, the design should aim to retain these trees.

#### Great South Road / Subway Road

- 7.7 No trees are identified within this area.

#### Great South Road / Wellington Street

- 7.8 There is a public open space in this area (57R Wood Street) containing an area of significant tree resource, including notable trees. These trees include mature native and exotic specimens which are discussed at section 5.1.2.5 of the SGA Arboricultural Assessment. The indicative design avoids removal or alterations of any of these significant trees.



- 7.9 Three street trees likely require removal within this area (one weeping elm [Tree 73] and three tulip trees [Group 75 and Tree 76]). The three tulip trees in particular are large specimens providing commensurate levels of ecosystem service benefits and amenity values. If removed, significant mitigation planting will be required when formulating the TMP and UDLMP.

Great South Road / Beach Road

- 7.10 This area of works is discussed at section 5.1.2.6 of the SGA Arboricultural Assessment. The cemetery and public open space at 298 Great South Road and 312 Great South Road contain a significant tree resource, including native and non-native trees, some of which are scheduled as notable. The notable trees here include a large gum (*Eucalyptus sp.*) a group of flowering gums (*Corymbia ficifolia*).
- 7.11 There are also two mature native notable trees within a traffic island (one rimu and one miro – trees 86 and 87) at the intersection of Butterworth Avenue and Great South Road. The submitted general arrangement plans avoids effects to these trees.
- 7.12 A group of significant trees located at Kirks bush (Trees/Groups 88-94) are located outside the designation, but with canopies and root zones which extend into the designation. These trees will require careful consideration during detailed design and preparation of the TMP.
- 7.13 None of the notable trees are proposed to be removed or altered under the indicative plans.

Great South Road / Park Estate Road

- 7.14 There are no particular trees of significance within this area. Adverse effects of tree removal will ultimately be proportionate to the size and number of trees affected by detailed design.

Slippery Creek Bridge

- 7.15 The majority of trees within this area is comprised of established native revegetation planting. The extent of tree removal and subsequent adverse effects will be dependent on construction methodologies and tree protection measures.



## NOR 2

- 7.16 No trees of significance are located within this area. While the willows provide some benefits through amenity values and stream shading, their removal can be readily mitigated.
- 7.17 As identified within Schedule A3 of the Arboricultural Assessment, the willows are likely to be “protected under the Regional Plan [RP] controls as vegetation within the riparian margin”. This is due to the trees being located within 10 metres of an Urban stream.

## NOR 3

- 7.18 The most significant trees within this area are the mature trees at the public park (Tadmor Park), 238R Great South Road. The indicative plan shows a batter slope into the reserve which could potentially have significant adverse effects on a good quality tree resource. The detailed design stage should consider engineering solutions to avoid the batter slope and resulting potential adverse effects.

## NOR 4

- 7.19 The trees within this area are discussed at 5.4.2 of the SGA Arboricultural assessment. There is a large pin-oak tree (Tree 117) at the intersection of Porchester Road and Airfield Road which is described in the SGA Arboricultural Assessment as a quality tree with high arboricultural values. I concur with that assessment. The tree is located within the proposed road widening, and it would appear that there would not be design options to allow its retention.
- 7.20 The arboricultural report, at 5.4.2 discusses “Groups of poplar and willow trees (Trees 118-124) at the western end of Popes Road”. I believe this may be a numbering error, and in fact should only include tree groups 122 – 124. I concur with the statements that as the area becomes urbanised the trees will become unsuitable for long term retention.

## Overall Mitigation Approach

- 7.21 The proposed ULDMP condition (condition 12) includes elements related replacement tree planting and an emphasis on retention of mature trees. The proposed ULDMP condition requires that it be prepared in accordance with Auckland Transport's Urban Roads and Streets Design Guide, Waka Kotahi Landscape Guidelines, Auckland Urban Ngahere (Forest) Strategy; and the requirement that the landscape design details include planting design details including (in 12(h)) identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan and where practicable, mature trees and native vegetation will be retained. The focus of the proposed TMP condition (condition 27) is on avoiding, remedying or mitigating effects of identified trees in Schedule 3 of the conditions. This includes planting to replace trees to be removed, with reference to condition 12 ULDMP planting design details. The TMP will be required to assess the overall values of trees that require removal (eco-system services / landscape systems and processes / natural character / visual amenity) and provide recommendations on how the ULDMP can “replicate the benefits that the extant



trees provide". This is discussed at section 4.3 of the SGA Arboricultural Assessment. I support the use of an outcomes-based approach to mitigation of tree removal as opposed to a 'like-for-like' numbers-based approach. This allows the values of each tree requiring removal to be assessed and sufficient and suitable replacement planting to be allocated during compilation of the TMP and ULDMP.

- 7.22 I concur with the Requiring Authorities identification of potential positive effects of the NoR regarding an increase in canopy cover along the road corridor and the quality of street trees within the site.

## 8. Submissions

- 8.1 I have reviewed the submissions and did not note any that raised any significant issues regarding trees currently protected by District Plan level rules of the AUP:OP.
- 8.2 Sub NOR1 – 23.7 Hansaben Patel. The submitter opposes the NOR on the basis that it will significantly and adversely affect their properties, the properties owners and the local community. With regards to my area of expertise, the submitter lists the following adverse effects; adverse landscape and visual amenity effects, including from required mature vegetation clearance.
- 8.2.1 It is unclear which mature vegetation is being referred to outside No.1 Grande Vue Drive. There are no trees within the designation boundaries in this location.
- 8.2.2 There is one Queen palm outside No.66 Great South Road which will likely require removal. Any adverse effects resulting from removal of the palm can be mitigated by replacement planting.
- 8.3 Sub No. NOR1 21.1 – Heritage New Zealand Pouhere Taonga. HNZPT is concerned that there has not been adequate assessment of the notable trees (individual/groupings) for their historic heritage values.
- 8.3.1 Having reviewed the Assessment of Archaeological and Heritage Effects Report, I note that trees have been identified as being listed in the Cultural Heritage Inventory (CHI). The Heritage report states that Heritage trees are not assessed within that documentation, and refers to them being assessed separately under the Arboricultural Assessment. However, within the Arboricultural Assessment, there is no cross-reference back to the reference numbers in the Heritage report. Having undertaken a brief cross-reference exercise, it would appear likely that the trees contained in the Heritage Report have been assessed in the Arboricultural report. To provide greater clarity and certainty on this, the arboricultural assessment report should cross-reference back to the item numbers referenced in the Heritage Report. Further to this, it would appear that neither report has identified any particular heritage values that any of these trees may possess and whether these may be adversely affected by the proposal. The Requiring Authority may wish to address this through Hearing evidence.



8.3.2 Arborists generally have a focus on the arboricultural values of the tree (form/size/health/rarity/amenity values etcetera) and defer to historians for any historical or heritage associations. The trees identified as notable in Schedule 10 of the AUP(OP) may or may not have heritage values. They may be listed for a variety of reasons, such as size, rarity, ecosystem service values, amenity values or associated heritage values. I defer to Council's expert heritage arborist, West Fynn, who addresses the matters raised in the HNZPT submission regarding the adequacy of the assessment of the heritage values of trees.

8.3.3 None of the notable trees are proposed for removal and the TMP will be the mechanism for minimising effects to them.

#### 8.4 Local Boards

##### Manurewa

The Manurewa Local Board do not support the removal of any significant trees at Anderson Park (58R Great South Road). I note that the design indicates that the road will not be widened into the reserve. The upgrading of Active Mode facilities through the reserve should avoid removal of trees through careful detailed design. I am satisfied that the proposed conditions are sufficient to ensure that this is achievable.

##### Papakura

The Papakura Local Board request protection of the following trees when later planning work is carried out:

- The phoenix palm and the totara tree near the Papakura Cenotaph
- The trees within Central Park along the edge of Opaheke Road
- The trees outside the veterinary practice on the corner of Beach Road

I note that none of these trees are proposed for removal under the submitted General Arrangement Layout plans. None of these trees are within the designation, but have canopies and root zones which extend into the designation. The proposed conditions require compilation of a Tree Management Plan. This management plan will ensure the protection of these trees.



## 9. Proposed Conditions of NOR

- 9.1 To identify existing trees protected under the District Plan, and suitably manage potential adverse effects to those trees, a condition of requiring preparation of a Tree Protection Management Plan (TMP) has been proposed by the Requiring Authority as part of a suite of conditions for each of the NOR.
- 9.2 A condition is also proposed for the preparation of an Urban and Landscape Design Management Plan (ULDMP) for each of the designations. The wording of the condition is considered suitable for ensuring that mitigation planting is carried out to a good standard.
- 9.3 I support both of these conditions as the appropriate tool to manage the actual and potential adverse effects of the NOR.
- 9.4 I have reviewed the proposed amendments to the ULDMP conditions recommended by my colleague Lisa Mein and am of the opinion that the amendments do not have any impact on arboricultural matters.
- 9.5 I have also reviewed the proposed amendments to the ULDMP conditions recommended by my colleague Daniel Kinnoch and have no concerns with the amendments. I concur that the reference to the specific plans for local areas is beneficial.
- 9.6 I have reviewed the Memorandum prepared by West Fynn – Senior Heritage Arborist (Heritage Arborist – Auckland Council). Mr Fynn provides comments specifically on trees scheduled as Notable trees in Appendix 10 – Notable Trees Schedule of the AUP(OP).
- 9.6.1 Mr Fynn makes the following comment in his memo at section 5: *“The Requiring Authority’s arborist report did not mention the rules under Section D13 of the AUP that are relevant in addition to the rules under Section E for notable trees.”*
- 9.6.2 This likely requires the interpretation of a planner, but my understanding is that the rules relating to infrastructure and its effects to notable trees are found at Section E26. These are slightly more permissive than Section D of the AUP(OP) recognising the public needs for infrastructure. Notwithstanding, I have double checked the SGA’s AEE, and in particular at *Table 11-2: Assessment of Project against relevant objectives and policies – Theme 1 – Enabling Infrastructure while managing its adverse effects*. I note that the table provides ‘Key Objectives and policies’ and provides a “summary and assessment”. Under the assessment notable trees are discussed, however there is no reference to the Objectives and Policies at D13 – Notable Trees Overlay. I consider this an oversight and do not believe it substantively alters the assessment of effects.





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## 10. Conclusions and Recommendations

- 10.1 Overall, there are no arboricultural reasons to not confirm the four NOR.
- 10.2 The conditions proposed by the Requiring Authority for the ULDMP and TMP are considered suitable measures to manage potential adverse arboricultural effects.
- 10.3 The submission of Heritage New Zealand Pouhere Taonga raises some issues regarding the assessment of the heritage values of identified notable trees. The Requiring Authority may wish to address these issues through Hearing Evidence.



# South Frequent Transit Network Notices of Requirement

## TECHNICAL EXPERT S.42A MEMO – TERRESTRIAL ECOLOGY

To:	Cheryl Cleary, Consultant Reporting Planner
From:	Simon Chapman (Auckland Council Consultant Ecologist, Ecology New Zealand Limited)
Date:	04/03/2024

Requiring Authority's Name:	Te Tupu Ngātahi Supporting Growth Alliance
Project:	South Frequent Transit Network (South FTN)

### 1. Introduction

#### 1.1. Name

1.1.1. My full name is Simon Chapman. I am employed as a Principal Ecologist by Ecology New Zealand Limited (Ecology NZ). I have over 20 years' experience as a professional ecologist. I hold the qualifications of Bachelor of Science and Postgraduate Diploma in Applied Science, both from Lincoln University.

1.1.2. I consider myself to be a generalist ecologist with specialist skills in indigenous flora and fauna. My work experience includes the design and implementation of biodiversity surveys and monitoring programmes, undertaking and peer reviewing ecological impact assessments, and developing and implementing ecological mitigation, management, and restoration plans.

1.1.3. My employers and roles through my career include:

- a. Ecology New Zealand (2016 - present): Ecology Manager and Principal Ecologist
- b. Golder Associates (2014 – 2016): Group Leader – Water Management and Ecology
- c. Andrew Stewart (2013 - 2014): Ecology Manager
- d. Boffa Miskell (2007 - 2013):
  - i. Principal Ecologist (2009 - 2013)
  - ii. Senior Ecologist (2007 - 2009)
- e. Envirollogic (2001 - 2007): Principal Ecologist / Director

## **1.2. Role**

I regularly provide ecological expertise to central and local government clients primarily for the processing of resource consent applications, Notices of Requirement, and plan changes. The topics I provide advice on include terrestrial, freshwater, wetland, and coastal ecology, threatened species monitoring and conservation, biodiversity offsetting / compensation, and ecological mitigation, management, and restoration. This report is my expert technical evidence on the South FTN NoRs and submissions relevant to my area of expertise. I have specialist ecological expertise and experience in matters directly relevant to this project, especially indigenous flora, and fauna, including lizards, bats and avifauna. In preparing this evidence I have reviewed the following documents:

- a) South FTN - AEE
- b) South FTN - AEE - Appendix A - Assessment of Alternatives
- c) South FTN - AEE - Appendix B - Ngaati Te Ata Waiohua Cultural Values Assessment - Redacted Version
- d) South FTN - General Arrangement Plan - NoR 1, NoR 2, NoR 3 and NoR4
- e) South FTN - Assessment of Arboricultural Effects
- f) South FTN - Assessment of Arboriculture Effects - Appendix B NoR 1, NoR 2, NoR 3, NoR4
- g) South FTN - Assessment of Ecological Effects
- h) South FTN - Assessment of Ecological Assessment - Appendix 11
- i) South FTN - Request for Further Information under s.92 RMA
- j) South FTN - Response to s92 request
- k) Form 18 Notice of Requirement for Designation of Land under s168(2) RMA
- l) Notice of Requirement NoR2 Submission 10.1 - Parks and Community Facilities Manurewa Local Board comments

In addition to considering the above documentation, I attended the following briefings and site visit provided by the Requiring Authority's project team:

- m) Conditions Presentation – 13 December 2023
- n) Site visit and project briefing presentation – 14 September 2023

## **1.3. Code of Conduct**

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express. I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason, and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## **2. Scope and Structure**

### **2.1. Subject Matter**

This report relates to the South FTN Notices of Requirement by Auckland Transport, which consists of:

- a) South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)
- b) South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)
- c) South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)
- d) South Frequent Transit Network: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4)

### **2.2. Limitations**

For a technical review of the freshwater aspects of the ecological assessment informing this application, I defer to the expert evidence provided by Council's expert, Antoinette Bootsma, in relation to aquatic ecology matters; and to that of Council's expert arborist, Leon Saxon, in relation to Arboriculture effects. Regional consenting matters are excluded from this assessment given that the Requiring Authority considers that only District Plan consents are required for the NoRs. Note, however, that the need for future regional consents is acknowledged by the Requiring Authority in the AEE.

### **2.3. Structure**

1. Introduction
2. Scope and Structure
3. Summary of key issues
4. Comment on the Assessment of Effects by Supporting Growth Alliance
5. Submissions and Local Board Comments
6. Comment on SGA Proposed Conditions
7. Recommendations

## **3. Summary of key issues**

### **3.1. Overview of issues**

- 3.1.1. The Notice of Requirement (NoR) effectively evaluates and avoids potential adverse effects through the concept design presented in general arrangement drawings. However, there are instances where it falls short in addressing or mitigating these effects due to the limited level of detail at this stage.
- 3.1.2. A noticeable gap exists between the NoRs for securing the designation and the subsequent regional consenting process. To bridge this gap, appropriate designation conditions can be used to address and overcome these issues.
- 3.1.3. I discuss this matter in section 4 and section 6 below. South Frequent Transit Network: NoR 1, NoR 2, NoR 3 and NoR 4, fauna effects assessment is sufficient for designation. However, it would be prudent to incorporate fauna surveys for selected indigenous fauna (bats, birds and lizards) and an Ecological Management Plans (if triggered by the outcome of the surveys) as designation conditions.

- 3.1.4. South Frequent Transit Network: NoR 1, and NoR 2, Freshwater and wetland effect assessment of flora and fauna is sufficient for designation, however conditions for additional surveys and management plans to mitigate effects are required as per Council's expert aquatic ecologist, Antoinette Bootsma, suggested conditions.
- 3.1.5. South Frequent Transit Network: Great South Road (Drury Section) (NoR 2). Submission 10.1 by Auckland Council – Parks and Community Facilities raises a concern about the effects of the NoR on 279 Great South Road, including the scale of effects on the vegetation, the stream, and its function as an esplanade reserve. I discuss the issues raised in that submission in Section 5 below.

### **3.2. Statutory Assessment**

The NoR must be assessed with particular regard to the relevant provisions of a national policy statement. I consider the National Policy Statement for Freshwater Management 2020 and the National Policy Statement Indigenous Biodiversity to be relevant to the ecological effects of the NoR under consideration. Effects on ecological features located in the proposed designations required to accommodate corridor upgrades are regulated primarily through regional consenting processes, including the AUP(OP) Chapter E3. On that basis, this section does not discuss district consenting matters. However, the below discussion is aimed at highlighting expected regional consenting matters to support alignment of the NoRs with future phases of the development of the South FTN.

#### **3.2.1. National Policy Statement for Freshwater Management 2020 (NPS-FM) and the National Environmental Standards for Freshwater 2020 (NES-F)**

The NPS-FM will also be relevant for the future regional resource consent applications, and together with the NES-F provide national direction for managing New Zealand's freshwater. This direction includes avoiding any further loss or degradation of wetlands and streams and encouraging their restoration.

#### **3.2.2. Wildlife Act 1953:**

Most native birds, and all native lizards and bats are absolutely protected under the Wildlife Act 1953, under which it is an offence to disturb, harm, or remove them without a permit from the Minister of Conservation.

#### **3.2.3. AUP: OP Regional Policy Statement**

Chapter B7, Natural Resources of the AUP: OP Regional Policy Statement is considered relevant as the objectives and policies in section B7.2 seek to ensure that indigenous biodiversity is maintained and degraded habitats enhanced, the loss of indigenous biodiversity and current or potential habitat for indigenous fauna is minimised and that any adverse effects are avoided, remedied, or mitigated.

### 3.3. Key issues

The NoR provides adequate assessment of effects, and appropriately avoids, potential and actual adverse effects through the concept design shown in the general arrangement drawings, but in some instances fails to remedy or mitigate adverse effects due to the level of detail required at this stage. There is a distinct gap between the NoR for the designation, and the future regional consenting process. Proposed conditions can be used to circumvent this issue.

Table 1: Key Ecological Issues in South FTN NoR

Notice of Requirement	Key (topic/area expertise) issues
South FTN: Great South Road FTN Upgrade (NoR 1)	<ul style="list-style-type: none"> <li>i. Native tree / vegetation removal effects on freshwater ecosystem.</li> <li>ii. Native tree / vegetation removal effects on highly mobile fauna.</li> <li>iii. Lack of specific requirements for addressing both loss of value and extent of stream/wetland habitat (including loss of riparian vegetation).</li> </ul>
South FTN: Great South Road (Drury Section) (NoR 2)	<ul style="list-style-type: none"> <li>i. Native tree / vegetation removal effects on freshwater ecosystem.</li> <li>ii. Native tree / vegetation removal effects on highly mobile fauna.</li> <li>iii. Lack of specific requirements for addressing both loss of value and extent of stream/wetland habitat (including loss of riparian vegetation).</li> </ul>
South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)	<ul style="list-style-type: none"> <li>i. Native tree / vegetation removal effects on highly mobile fauna.</li> </ul>
South FTN: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4)	<ul style="list-style-type: none"> <li>i. Native tree / vegetation removal effects on highly mobile fauna.</li> </ul>

## 4. Comment on the Assessment of Effects by the Requiring Authority

### 4.1. Areas of disagreement

4.1.1. As raised in the Council's s.92 Request for Information (RFI) (ENZL 1) the National Policy Statement for Indigenous Biodiversity (NPS:IB) mandates a comprehensive assessment that looks beyond and considers site selection and alignment in finer detail, adopting a precautionary approach.

- a) NPS-IB Policy 15 specifically directs the identification and management of areas outside Significant Natural Areas (SNAs) that support specified highly mobile fauna, with the goal of preserving their populations across their natural range.

- b) The SGA response was that no further effects management is required for highly mobile fauna.
- c) While the infrastructure upgrades aim to enhance habitat connectivity, particularly for freshwater and terrestrial species, the removal of large trees poses a potential threat to indigenous fauna.
- d) The Assessment acknowledges potential adverse effects on habitat, emphasising the importance of managing such impacts.
- e) Additionally, there is a potential for non-TAR (Threatened, At-Risk) birds to be present and breeding within vegetation that requires a District Plan land use consent for removal, and that will therefore not require a consent if the work is for a purpose authorised by the designation.
- f) Even if the magnitude of an effect on indigenous biodiversity is considered low, management measures may still be a requirement under the Wildlife Act to prevent harm to native bats, birds and lizards.

4.1.2. As raised in the s.92 RFI (ENZL 2), there is scope within the designation to address (including to avoid) some potential effects/concerns/regional matters through design considerations at the detailed design phase.

- a) The SGA response was that concept level of design has been undertaken to inform the designation boundaries and route protection.
- b) As acknowledged in the EclA, further consideration of ecological matters and input will be required for the Project (as relevant) as part of the future Regional consenting phase.
- c) The proposed designation boundaries provide for specific bridge design and stormwater management to be determined as part of the detailed design process and subject to Regional consent requirements.
- d) Some of the effects may change over time and will require additional assessment at the Regional consenting stage. However, the mechanisms to ensure those processes are followed should be incorporated as designation conditions.

4.1.3. The s.92 RFI (ENZL 3) requested the inclusion of ecological input during the design development and detail design phase specifically for lighting.

- a) The specifications of lighting design relevant to minimising effects on bats should be prepared consistent with an Ecological Management Plan (EMP) if bats are detected within the project area during future fauna surveys.
- b) The SGA response was that lighting design will be developed during future phases of the project and will be subject to current best practice, including minimising light spill. However, there is nothing enforcing this in the form of conditions.

4.1.4. I note that the response to the s.92 RFI (P26), which requested further information as to what is intended to be included in the Ecological Management Plan listed in proposed Condition 7 Outline Plan was that:



*The reference to 'Ecological Management Plan' in this condition "will be updated to refer to a 'Lizard Management Plan' instead". The only mitigation recommended in the EclA considering the potential adverse effects identified is for lizard management (in specific areas). An Ecological Management Plan is therefore not considered necessary.*

- 4.1.5. As this is a large project that may adversely affect indigenous fauna species and their habitats, pre-construction Ecological Surveys and possibly an Ecological Management Plan would be appropriate to ensure that appropriate ecological management is implemented. Given the uncertainty around construction timeframes and detailed design, it would not be prudent to limit pre-construction surveys and ecological management to just one fauna group (indigenous lizards), and only to locations selected based on a 2023 snapshot as presented in the Ecological Impact Assessment.
- 4.1.6. It may be appropriate for the development and implementation of the various components of an Ecological Management Plan (bats, birds and lizards) to be triggered by the outcomes of pre-construction ecological surveys to be carried out at the start of the detailed design stage. The surveys would be based on appropriate fieldwork to determine areas if/where the Ecological Management Plan would apply, and to which indigenous fauna species.
- 4.1.7. As construction may not commence for a number of years, it is important to undertake fresh surveys during the lead-up to construction to determine the presence and locations of indigenous bats, birds and lizards closer to the time of construction. The target species and survey locations for the pre-construction surveys should not be restricted based on the 2023 Ecological Impact Assessment fieldwork.
- 4.1.8. The pre-construction survey would include matters such as whether Threatened or At-Risk fauna are present, and whether they would be adversely affected by the works.
- 4.1.9. If required, the Ecological Management Plan should have the objective of avoiding, remedying, mitigating, offsetting, or compensating adverse effects on indigenous bats, birds, and lizards, and would provide the details of appropriate ecological management measures.
- 4.1.10. As raised in s.92 (ENZL 4), it was recommended to incorporate ecological considerations, especially related to fish passage, during the design development of the bridge construction.
  - a) The rationale behind this suggestion is that the planned infrastructure upgrades involve widening current undersized structures. These upgrades aim to enhance habitat connectivity for both freshwater and terrestrial species by improving fish passage and enhancing riparian habitat connectivity.

- b) Leveraging the new bridge designs presents an opportunity to minimise negative impacts on freshwater habitat, facilitate fish passage, and effectively manage invasive species.
- c) The SGA response was that this is part of the future Regional consenting phase. On that basis, the conditions recommended by Council's expert aquatic ecologist, Antoinette Bootsma, should be followed.

4.1.11. As raised in s.92 RFI (ENZL 5) it was recommended to incorporate ecological considerations, focusing on bat habitat, during the detail design phase of the bridge construction.

- a) The rationale behind this suggestion is that the planned infrastructure upgrades present an opportunity to minimise effects on bats.
- b) The desktop assessment identified stream systems and areas with large trees within the Project Area, such as TL.1, TL.2, TL.3, and WF7, where long-tailed bats may potentially utilise, particularly for foraging, based on previous survey data.
- c) The Requiring Authority's response was that specific bridge design is to be determined as part of the detailed design process and subject to Regional consent requirements. However, there is nothing enforcing this in the form of conditions.

4.1.12. As raised in s.92 RFI (ENZL 6) it was recommended to include a requirement for a Bat Management Plan for all Notices of Requirement (NoRs).

- a) The proposed conditions involve preconstruction bat surveys and potential habitat surveys to confirm the presence and habitat use of bats. If bats are found within the zone of influence and their habitat is at risk, a bat management plan, as outlined in the Assessment of Ecological Effects on page 59, will be implemented.
- b) The rationale for this includes the disturbance and displacement of existing bat populations, with Very High ecological value.
- c) Desktop investigations have confirmed bat activity within the Zone of Influence (ZOI), and the presence of potential roosting habitats in various areas.
- d) Given the significant number of trees to be removed, the applicant's ecologist is advised to recommend bat management in line with the latest Department of Conservation (DOC) protocols and any regional consent conditions required for compliance with the Wildlife Act 1953.
- e) The Requiring Authority's response was that the magnitude of effects was assessed as Negligible for all effects. As such, a Bat Management Plan is not considered necessary. However, the habitat may be used by bats at the time of construction, and there is nothing enforcing surveys and management in the form of conditions.

4.1.13. As raised in s.92 RFI (ENZL 8) it was requested to incorporate the necessity for a Lizard Management Plan (LMP) for Notice of Requirement 4 (NoR 4).

- a) This is motivated by the need to address the impacts on Threatened, At-Risk (TAR) herpetofauna species resulting from the removal of district plan trees and vegetation, requiring appropriate mitigation measures.
- b) While a LMP is already specified for NoR 1 to NoR 3, the extensive vegetation removal in NoR 4 warrants similar mitigation efforts.
- c) The Requiring Authority's response was that the only locations of District Plan vegetation removal identified as having potential for lizard habitat are at specific locations within NoR 1, 2 and NoR 3.
- d) A Lizard Management Plan is therefore recommended to manage the effects at these specific locations only.
- e) As there is a time lapse between designation and construction, habitat surveys may reveal new areas of concern, and if vegetation and therefore potential habitat removal is necessary, the appropriate management should be followed in all these areas.

4.1.14. As raised in s.92 RFI (ENZL 9) it was requested to include an Avifauna Management Plan (AMP) for all Notices of Requirement (NoRs) that addresses Threatened, At-Risk (TAR) birds.

- a) The rationale is based on the South FTN Project area providing suitable breeding habitat for TAR birds, with a Very High ecological value. Managing potential effects on avifauna through strategies like avoidance, minimization, or mitigation is considered appropriate in this context.
- b) The Requiring Authority's response was that the assessment of locations with the potential for Threatened, At-Risk (TAR) bird species, outlined in Section 8.3 of Assessment of Ecological Effects, the magnitude of impact has been determined as Negligible.
- c) This assessment considers various factors, including the project scope, bird ecology, and the type of habitat within the project area.
- d) State Highway 1 lands at Slippery Creek, the nearby SEA-M1\_29b Upper reaches Drury Creek, situated approximately 160m away and separated by State Highway 1, provides suitable breeding habitat for banded rail.
- e) However, the narrow strip of oioi, restiad rushland/reedland (WL10) identified within the designation boundary is considered highly unlikely to be utilised by breeding TAR birds due to its limited extent, available cover, and the surrounding disturbances from existing roads, including SH1, and surrounding urbanisation.
- f) Nevertheless, it is anticipated that banded rail may traverse the project area for foraging within the designation boundary. Efforts have been made to avoid potential impacts on breeding TAR birds, with the construction area positioned at a distance exceeding 160m from potential breeding habitat.
- g) Given this distance and the existing background levels of disturbance, including noise and vibration from SH1, the existing GSR bridge, and surrounding urban/industrial areas, additional mitigation measures such as visual screening, noise barriers, or construction timing restrictions are deemed unnecessary.

- h) However, fauna surveys and an Ecological Management Plan would ensure that mitigation measures are implemented.

#### **4.2. Effects on the environment**

- 4.2.1. NoR 1 includes the replacement of the Otūwairoa / Slippery Creek bridge, which will most likely require removal of groups of trees (Trees 106-113) located within the road reserve land around the Slippery Creek. These native trees provide habitat and soil protection in the riparian margin. According to the Assessment of Arboricultural Effects this could have significant environmental effects if all the trees need removal but could be lessened if trees and tree groups can be avoided.
- 4.2.2. The Assessment of Ecological Effects identified Slippery Creek/Otūwairoa Stream (FTN1\_S1) as a Permanent stream, with a Moderate RHA category and having a High Ecological Value. This area also includes Oioi restiad rushland/reedland (WL10), which occurs on the left and right banks of the Otūwairoa Stream / Slippery Creek) and Planted wetland (PLW.1).
- 4.2.3. The Assessment of Ecological Effects identified the area as having a High Ecological Value.
- 4.2.4. The upgrades to the existing infrastructure will improve habitat connectivity for freshwater and terrestrial species due to improved fish passage and improved riparian habitat connectivity.
- 4.2.5. However, the removal of large trees will have an adverse effect on fauna and flora utilizing the trees as habitat as well as the stream fauna and flora and stream ecosystem services.
- 4.2.6. Potential for non-TAR birds to be present and breeding with district Plan vegetation is likely. Although the Magnitude of effect is considered to be low impact, management will be required under the Wildlife Act to prevent killing or injuring of native birds.
- 4.2.7. NoR 2 includes road widening, and the replacement of the Hingaia Stream bridge. Construction work may necessitate the removal of substantial willow trees (Tree Groups 115 and 116) within the NoR boundary. These provide habitat and are essential for the stream fauna and flora, as well as contribute significant ecosystem services.
- 4.2.8. Some trees (Group 116) are protected by the District Plan within the road reserve, while others will need Regional Consent due to their location within riparian margins.
- 4.2.9. The impact of removing trees according to the District Plan on bats' roosting and the availability of roosting habitats has been evaluated.
- 4.2.10. Except for a specific willow in tree group 115, which possesses a moderate potential for bat roosting, all the trees examined in the Arboriculture Effects Assessment were deemed to have low potential for bat roosting.
- 4.2.11. This assessment was made considering the absence of suitable roosting features and/or their proximity to roads and surrounding land use.
- 4.2.12. It is anticipated that an assessment and management of any potential risks linked to the removal of the willow tree (part of tree group 115), will be carried

out and addressed as part of the Wildlife Act compliance process in the resource consent phase of the project.

- 4.2.13. When considering recent bat records relevant to the Project Area, bat activity has been detected within five kilometres of the NoRs. Adopting a precautionary approach is appropriate for a Nationally Critical species such as long-tailed bat therefore they should be considered to be present – especially given their large home ranges of up to around 100km<sup>2</sup>.
- 4.2.14. The environment may change substantially (improve or degrade) over time, which indicates that future bat presence and habitat locations may not reflect the current situation.
- 4.2.15. To ensure compliance with the Wildlife Act, and to manage effects on mobile fauna, pre-construction indigenous fauna surveys (for bats, birds and lizards) and an Ecological Management Plan should be required as designation conditions.

#### **4.3. Requiring Authority Recommendations and Proposed Conditions**

- 4.3.1. The recommendations are sufficient for the effects on TAR herpetofauna species due to the removal of district plan trees/vegetation in the form of a LMP for NoR 1 – 4. However, TAR avifauna, bats and freshwater fauna and flora were not accounted for in the same manner.
- 4.3.2. Most native birds and lizards are absolutely protected under the Wildlife Act 1953, under which it is an offence to disturb, harm, or remove them without a permit from the Minister of Conservation. To ensure compliance with the Wildlife Act, and to appropriately manage actual and potential adverse ecological effects on mobile fauna, a Pre-construction Fauna Survey and an Ecological Management Plan should be required by designation conditions.

## **5. Submissions**

### **5.1. Overview of submission issues**

- 5.1.1. South Frequent Transit Network: Great South Road (Drury Section) (NoR 2). Submission 10.1 by Auckland Council – Parks and Community Facilities raises a concern about the effects of the NoR on 279 Great South Road, including the scale of effects on the vegetation, the stream, and its function as an esplanade reserve.
- 5.1.2. This submission relates directly to NoR 2, which includes road widening and the replacement of the Hingaia Stream bridge. Bridge construction activities may require the removal of sizable willow trees (Tree Groups 115 and 116) situated within the NoR boundary. These trees play a vital role by providing habitat and are crucial for the well-being of stream fauna and flora, contributing substantially to ecosystem services.

5.1.3. While some trees (Group 116) fall within the District Plan due to their height, and their location within the road reserve, others will require Regional Consent due to their location in the riparian margin. This was also raised in the s.92.

5.1.4. Esplanade reserves serve the purpose of safeguarding the margins of freshwater bodies to preserve environmental values, in accordance with the provisions outlined in section 6(d) of the Resource Management Act 1991 (RMA). Additionally, they offer opportunities for public access and recreational use.

5.1.5. No other submissions raised matters relating to terrestrial ecology.

## 5.2. Technical assessment of the submission

Table 3 Assessment of Ecological Issues Raised in Submissions

Submission Point Number	Submitter Name	Issue	Relief Sought	Technical Assessment
10.1	Auckland Council, Parks and Community Facilities	Effects of the NoR on 279 Great South Road, including the scale of effects on the vegetation, the stream, and its function as an esplanade reserve.	Conditions on the NoR, including additional surveys and management plans at pre-construction stage.	Similar issues were included in the s.92. However, Esplanade Reserves should be given specific attention. At this stage it is difficult to determine the actual adverse effects as it is not known which trees or how many will require removal.

## 5.3. Local Board Comments

5.3.1. On December 7, 2023, the Manurewa Local Board under resolution number MR/2023/219 provided Local Board Views on the South FTN NoRs. The Manurewa Local Board resolved that they:

*“...recommend Supporting Growth work in partnership with Eke Panuku on planting and restoration enhancement opportunities around the Puhinui Stream near the Great South Road.”*

5.3.2. The matter of restoration planting will be addressed at the time of Regional consenting, using biodiversity offsetting calculations to ensure no net loss of biodiversity.

## 6. Comment on Requiring Authority Proposed Conditions

## **6.1. Proposed Conditions Identified**

- 6.1.1. The AEE draws on information provided in the Technical Assessment Reports (contained in Volume 4 of the AEE) to assess and provide recommended mitigation measures as appropriate.
- 6.1.2. Proposed Condition 25 (NoRs 1,2,3 and 4) Pre-Construction Lizard Survey states that at the start of detailed design for a Stage of Work, an updated survey of native lizards and their habitat in the locations shown in Schedule 2: Identified Native Lizard Habitat Areas shall be undertaken. This restriction to only locations identified in Schedule 2 could pose a problem at the time of pre-construction surveys, as lizards may no longer be in these locations and may be in areas outside of previously identified locations, where surveys are not planned to take place.
- 6.1.3. Proposed Condition 25 (NoRs 1,2,3 and 4) Pre-Construction Lizard Survey and Proposed Condition 26 (NoRs 1,2,3 and 4) Lizard Management Plan (LMP) indicate that fauna surveys and management plans are necessary, and it is my opinion that a similar approach would be appropriate for indigenous bats and birds, and that expanded approach should be reflected in the designation conditions.
- 6.1.4. Proposed Condition 27 relates to the effects on the trees but does not address the effects on the stream fauna and flora from removal of the trees. It also does not address the effects on highly mobile fauna such as bats and birds from removal of the trees. The effects on indigenous fauna can be addressed by replacing Conditions 25 and 26 as recommended below, and it is expected that effects on streams will be addressed during regional consenting.
- 6.1.5. The assessment has identified that the loss of vegetation required for the Project will result in loss lizard habitat within NoRs 1, 2, and 3. Consequently, a Tree Management Plan (TMP) and Lizard Management Plan (LMP) are offered as conditions providing for the mitigation of these effects for only NoRs 1, 2 and 3. This should be extended to NoR 4 as well.

## **6.2. Expert opinion**

- 6.2.1. Construction activities that will be authorised by the NoR, and the effects of removing altering protected/large trees as identified in all NoRs by the applicant's assessment, may adversely affect indigenous birds and bats.

## **7. Recommendations**

### **7.1. Fauna Surveys**

- 7.1.1. Designation conditions requiring Fauna Surveys for indigenous bats, birds and lizards would be appropriate because the distribution and abundance of those species and their habitats may change substantially between now and the

commencement of construction. Given that the Project's construction timeframes are uncertain, it would be prudent to include conditions that require a reassessment of indigenous fauna and their habitats across the entire project footprint closer to the time of construction.

7.1.2. Limiting the scope of future surveys based on the situation at the time of the surveys for the Ecological Impact Assessment (mid-2023) as per condition 26 may lead to a failure to adequately address the Project's actual adverse ecological effects. The objective of the fauna surveys would be to assess the requirement for mitigation of adverse effects on indigenous fauna and their habitats across the project footprint.

## **7.2. Ecological Management Plan**

7.2.1. An Ecological Management Plan (EMP) should be required by designation conditions to provide for the management of adverse effects on indigenous fauna and their habitats should the surveys recommended above in 7.1 identify potential adverse effects.

7.2.2. The proposed conditions offered by the Requiring Authority for the Notice of Requirement for Airport to Botany Bus Rapid Transit project have come to my attention, and I am of the opinion that similar conditions for a Preconstruction survey (limited to indigenous fauna for the South FTN) and an Ecological Management Plan should be required.

## **7.3. Recommended Conditions**

7.3.1. I recommend the following ecological conditions in substitution of Conditions 25 and 26 as proposed by the Requiring Authority:

### **25. Pre-Construction Ecological Survey**

(a) At the start of detailed design for a Stage of Work, an updated ecological survey shall be undertaken within the works footprint by a Suitably Qualified and Experienced Person. The purpose of the survey is to inform detailed design and guide ecological management by identifying if and where indigenous fauna (including Regionally or Nationally At-Risk or Threatened species) are present.

(b) Mana Whenua shall be invited as partners to observe how the ecological survey in (a) will be undertaken.

(c) If the ecological survey confirms the presence of indigenous bats, birds and/or lizards in accordance with Condition 25(a) then an Ecological Management Plan shall be prepared in accordance with Condition 26.

(d) if the ecological survey in accordance with Condition 25(a) does not confirm the presence of indigenous bats, birds and/or lizards then a report setting out the methodologies and results of the ecological survey shall be provided to Council at the time of the Outline Plan for that Stage of Works.

### **26. Ecological Management Plan (EMP)**



(a) An EMP shall be prepared for any for areas where indigenous fauna are confirmed in accordance with Condition 25 prior to the Start of Construction for a Stage of Work. The objective of the EMP is to minimise adverse effects of the Project on indigenous bats, birds and lizards as far as practicable.

(b) The EMP shall provide a summary of the methodology used and the results of the Ecological Survey.

(c) The EMP shall set out the methods and other details relevant to achieving the objective as follows:

(i) if an EMP is required in accordance with Condition 25(c) for the presence of long-tailed bats the following information shall be provided in the EMP:

A. measures to minimise disturbance from construction activities within the vicinity of any active roosts that are discovered until such roosts are confirmed to be vacant of bats;

B. how the timing of any construction work in the vicinity of any maternity long tail bat roosts will be limited to outside the bat maternity period (between December and March) where reasonably practicable;

C. details of areas where vegetation is to be retained where practicable for the purposes of the connectivity of long tailed bats;

D. details of how bat connectivity will be provided and maintained (e.g. through the presence of suitable indigenous, or exotic trees or artificial alternatives) will be provided and maintained; and

E. where mitigation isn't practicable, details of any offsetting proposed.

(ii) If an EMP is required in accordance with Condition 25(c) for the presence of Threatened or At-Risk birds (excluding Wetland Birds) the following information shall be provided in the EMP:

A. how the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;

B. where works are required within the Confirmed Biodiversity Area during the bird breeding season (including Rail), methods to minimise adverse effects on Threatened or At-Risk birds; and

C. details of grass maintenance if Rail are present.

(iii) If an EMP is required in accordance with Condition 25 for the presence of Threatened or At-Risk wetland birds the following information shall be provided in the EMP:

A. how the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;

B. where works are required within the Confirmed Biodiversity Area during the bird breeding season, methods to minimise adverse effects on Threatened or At-Risk wetland birds; and

C. undertaking a nesting bird survey of Threatened or At-Risk wetland birds prior to any Construction Works taking place within a 50m radius of any identified Wetlands.

(iv) If an EMP is required in accordance with Condition 25 for the presence of native lizards the following information shall be provided in the EMP:

A. a detailed description of the methodologies and timing for survey, trapping, and relocation of salvaged native lizards;

B. a detailed description of the lizard release site(s):

C. details of measures to ensure the relocation site is suitable protected and remains viable as a long-term habitat (e.g. covenants, consent notices etc.);

D. details of measures to ensure the lizard release site is suitably managed to ensure appropriate habitat for native lizards (e.g. provision of additional refugia, weed and pest management);

E. monitoring of relocation sites if necessary to evaluate translocation success; and

F. the LMP shall be consistent with any native lizard management measures to be undertaken in compliance with conditions of any regional resource consents granted for the Project.

7.3.2. I ask that the Requiring Authority consider the two replacement conditions I have recommended for the South FTN NoRs in evidence at the hearing.

**Simon Chapman | Principal Ecologist | 4 March 2024**  
**Ecology New Zealand – Consultant to Ecological Advice**

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# MEMO

## TECHNICAL EXPERT MEMO for South Frequent Transport Network [FTN] NoRs

To:	Cheryl Cleary, Consultant Reporting Planner and Joy LaNauze, Senior Policy Planner, Auckland Council
From:	Antoinette Bootsma, Senior Specialist, Earth, Streams and Trees, Specialist Unit Regulatory Engineering & Resource Consents Department, Auckland Council
Date:	05/03/2024

Requiring Authority's Name:	Te Tupu Ngātahi Supporting Growth Alliance
Project:	South Frequent Transit Network (South FTN)

### 1. Introduction

- 1.1 My name is Antoinette Bootsma and I am currently employed as a Senior Specialist in the Earth, Streams and Trees team at Auckland Council.
- 1.2 I hold a Masters degree in Environmental Science (*Cum Laude*) obtained from the University of South Africa in 2016. I have 16 years experience in undertaking freshwater ecological specialist assessments to inform resource consent applications.
- 1.3 I have been tasked to undertake a technical peer review of the freshwater ecological component of the application for the proposed South Frequent Transit Network (FTN) including four Notices of Requirement (NoR) proposed to authorise transport upgrades along key sections of roads which fall within the South FTN network.
- 1.4 I was unable to attend the SGA briefing on 13 December 2023, however a copy of the *Conditions Workshop* file was provided to me and I have reviewed this.
- 1.5 I have reviewed the following documents in preparing this evidence:
  - 1.1. '*South Frequent Transit Network Assessment of Effects on the Environment, Appendix A: Assessment of Alternatives Report*' prepared by Te Tupu Ngātahi Supporting Growth, dated 13 October, 2023
  - 1.2. '*South Frequent Transit Network Assessment of Effects on the Environment*' prepared by Te Tupu Ngātahi Supporting Growth, dated 13 October, 2023. Hence with referred to as the AEE,

- 1.3. *'General arrangement drawings'*, prepared by Te Tupu Ngātahi Supporting Growth, dated 13 October, 2023
  - 1.4. *'South Frequent Transit Network Assessment of Ecological Effects'* prepared by Te Tupu Ngātahi Supporting Growth, dated 13 October, 2023. Hence with referred to as the Assessment of Ecological Effects.
  - 1.5. Section 92 RMA Request for Further Information dated 30 October 2023
  - 1.6. Response by the Requiring Authority dated 10 November 2023
  - 1.7. Manurewa Local Board under resolution number MR/2023/219 provided Local Board Views on the South FTN NoRs.
- 1.6 This memo provides my expert technical evidence on the South FTN NoR and submissions relevant to the aquatic ecological aspects of the application.

## **2. Code of Conduct**

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## **3. Scope and Structure**

- 3.1 The scope of this memo covers the aquatic ecological component of the South FTN including four NoRs:
- 3.1. South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)
  - 3.2. South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)
  - 3.3. South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3) South Frequent Transit Network: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)
- 3.2 This aspect of the ecological assessment of effects falls within my area of expertise which does not include terrestrial ecology (including terrestrial vegetation, bats, avifauna or herpetofauna). For a technical review of the terrestrial aspects of the ecological assessment informing this application, I defer to the terrestrial ecologist's expertise.

3.3 The structure of technical input is as follows:

Section 1	Application Description
Section 2	Introduction
Section 3	Code of Conduct
Section 4	Scope and Structure
Section 5	Summary of key issues
Section 6	Assessment of effects
Section 7	Comments on Supporting Growth Alliance proposed comments
Section 8	Recommendations

4. **Summary of key issues**

- 4.1 The below summary of key issues is taken from the Assessment of Ecological Effects.
- 4.2 The construction of the Project will directly impact 10 streams, with an estimated potential 45m of stream reclamation where indicative designs require the stream sections to be culverted, piped, or realigned.
- 4.3 The construction of the Project will directly impact three natural inland wetlands. Approximately 1053m<sup>2</sup> of direct wetland loss is estimated based on the footprint of the corridor widening and batter slopes, additionally 550m<sup>2</sup> are likely to be temporarily impacted during construction.
- 4.4 It should be noted that predictions of potential loss of stream length are considered to be indicative. The measurements are based on a potential route option and an approximate measurement of loss.
- 4.5 Key issues in contention:

Notice of Requirement	Key issue
South FTN: Great South Road FTN Upgrade (NoR 1)	<ul style="list-style-type: none"> <li>(i) At the GSR/ Otūwairoa Stream / Slippery Creek crossing, FTN1-W1, predicted loss of potentially 29m<sup>2</sup> wetland classified as planted native wetland and WL10, Oioi, restiad rushland/reedland which forms part of Otūwairoa Stream / Slippery Creek. Area for proposed wetland loss corresponds with the indicative construction area, although the fill area is smaller. Potential for demonstrating avoidance of wetland loss is possible. The EclA identifies this area as a potential Inanga breeding habitat.</li> <li>(ii) The EclA further that <i>'Where permanent wetland loss is likely to be unavoidable, there are opportunities within the designation boundary or within adjacent</i></li> </ul>

		<i>public land to accommodate potential future compensation requirements.'</i>
	(iii)	Proposed bridge over FTN1_S1 (Slippery Creek/ Otūwairoa Stream)
	(iv)	Schedule A2 NoR 1 - The Assessment of Aboricultural Effects states that tree groups 106, 107, 108, 112 and 113 are 'likely to be protected under the Regional Plan (RP) controls as vegetation within the Riparian area.
South FTN: Great South Road (Drury Section) (NoR 2)	(i)	Proposed bridge over FTN2_S1 (Hingaia Stream)
	(ii)	Permanent stream FTN2_S2, (Unnamed Hingaia Stream tributary), predicted loss of approximately 10m stream length, proposed culvert to drain into the remainder of the stream. Upstream and downstream sections of this bridge are likely piped.
	(iii)	Schedule A3 NoR 2 - The Assessment of Aboricultural Effects states that tree groups 115 and 116 are 'likely to be protected under the Regional Plan (RP) controls as vegetation within the Riparian area.
South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)	(i)	Permanent stream FTN3_S2, (unnamed Papakura Stream tributary), predicted loss of approximately 10m stream length to accommodate fill for proposed extended designation area.
	(ii)	Intermittent stream FTN3_S3, (unnamed Papakura Stream tributary), predicted loss of approximately 5m stream length to accommodate fill for proposed extended designation area.
	(iii)	Wetland WF7 habitat lies downstream of the proposed fill in stream FTN3_S3 and could potentially be affected during the construction phase.
	(iv)	Intermittent stream FTN3_S4, predicted loss of approximately 15m stream length to accommodate fill for proposed extended designation area adjacent to the proposed bridge over SH1, Manukau City to Takaanini
	(v)	Exotic wetland FTN3_W2, potential

		permanent loss of 209m <sup>2</sup> to accommodate fill for proposed extended designation area adjacent to the proposed bridge over SH1, Manukau City to Takaanini. An open water area adjacent to wetland WF7 habitat and could potentially be affected during the construction phase.
South FTN: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4)	(vi)	Intermittent stream FTN4_S1, (Unnamed Papakura Stream tributary), predicted loss of approximately 4m stream length.
	(vii)	FTN4_S2 Papakura Stream tributary

**5. Overall comment on the *Assessment of Ecological Effects October 2023* Glover (for SGA)**

- 5.1 Effects on aquatic ecological features, including streams and wetlands located in the proposed designations required to accommodate corridor upgrades are regulated primarily through regional consenting processes, including the AUP(OP) Chapter E3 and the NES-F (2020). As such, this section does not discuss district consenting matters. However, the below discussion is aimed at highlighting expected regional consenting matters to support alignment of the NoR with future phases of the development of the South FTN.
- 5.2 Section 9 of the Assessment of Ecological Effects report, dated 13 October 2023, discusses how ecological features were considered during an Alternatives Assessment and proposed designation boundaries. A shortlisted 151 options (listed in the AEE, Appendix A: Alternatives Assessment) were sorted according to relevant modes/intervention categories for shortlisting and assessment through Multi-Criteria Assessments. This process demonstrates consideration of impacts to streams and wetlands and supports the effects management hierarchy through adverse effects are avoided where practicable, consistent with the requirements of the NPS-FM (2020). This approach further supports alignment of the designations with future regional consenting considerations.
- 5.3 Section 9.2 of the Assessment of Ecological Effects report lists the streams potentially impacted during the construction and operational phases of the upgrade of roads, bridges and culverts. This report states that approximately 45m of stream reclamation may be required to accommodate the Project works. The five streams where reclamation may be required are classified as Moderate to Low ecological value. I agree with this assessment.
- 5.4 Streams and wetlands are not shown on the General Arrangement Plans. All plans should be updated to reflect wetlands and streams recorded in the Assessment of Ecological Effects.
- 5.5 The Assessment of Ecological Effects states that, where stream loss is likely to be

unavoidable, there are opportunities within the designation boundary or within adjacent public land to accommodate potential future compensation requirements. Following a review of the General Arrangement Plans, I agree with this assessment.

- 5.6 I further agree that the future regional consenting process, in particular rules under Chapter E3 of the AUP(OP) will require detailed bridge and culvert design and fish passage requirements as set out in standards E3.6. Furthermore, future consenting under the NES-F (2020) will require Stream Ecological Valuation (SEV) assessments, detailed offset/compensation assessments which consider both loss of extent as well as stream value as per Appendix 6 of the NPS-FM, Principles for aquatic offsetting. I propose an additional condition in Section 8 below to ensure that the NoRs are aligned with regional consenting requirements.
- 5.7 Assessments of SEV will necessarily include loss of vegetation in the riparian yard and where these values are used to calculate offsetting targets, appropriate revegetation can be addressed to ensure an improved ecological outcome.
- 5.8 The Assessment of Ecological Effects states that approximately 1053m<sup>2</sup> of direct wetland loss is estimated based on the footprint of the corridor widening and batter slopes, additionally 550m<sup>2</sup> are likely to be temporarily impacted during construction. The high value wetland habitat at FTN1\_W1 (29m<sup>2</sup> potential permanent loss on both left and right banks of the Otūwairoa Stream / Slippery Creek) was noted as a possible inanga (At Risk Declining) spawning habitat. Although the AEE does not provide further focus on this important wetland, adherence to the effects management hierarchy during the future regional consenting phase will require an evaluation of this feature with regards to offsetting or compensation targets. A review of the General Arrangement Plan for NoR 1 indicates that opportunities exist for applying the effects management hierarchy by avoiding and mitigating loss of high value wetland habitat. I am further confident that the designation of this area to allow future development will not preclude the potential for effective offsetting or compensation for potential permanent loss of habitat enabled by the NoR.

## 6. Submissions

- 6.1 A submission relating to aquatic resources focused on the potential for planting and restoration enhancement. I present a technical assessment in the table below.

Submission Point Number	Submitter	Issue	Technical Assessment
NoR 2 Submission 10.1	Auckland Council – Parks and Community Facilities	Concern about effects of the NoR on 279 Great South Road, including the scale of effects on the	Regional consenting regulations including the NPS-FM, NES-F and AUP(OP) require implementation of the effects management hierarchy to ensure that activities that require



		vegetation, Hingaia stream, and its function as an esplanade reserve	<p>a negative impact on an aquatic habitat to occur, must also demonstrate how the impact is mitigated, offset or compensated.</p> <p>The Assessment of Ecological Effects acknowledges that this process will be required during future regional consent phases to ensure that no negative impact occurs as a result of the proposed upgrade of transport infrastructure.</p> <p>A review of the General Arrangement Plan and aerial imagery for this watercourse crossing indicates that the NoR for this designation should not preclude adherence to this process. Proposed conditions to ensure that appropriate avoidance, mitigation and, where required, offsetting, are included in Section 8 below.</p>
Local Board Views on the South FTN NoRs	Manurewa Local Board, under resolution number MR/2023/219	The Manurewa Local Board resolved that they recommend Supporting Growth work in partnership with Eke Panuku on planting and restoration enhancement opportunities around the Puhinui Stream near the Great South Road	The matter of restoration planting will be addressed at the time of regional consents as part of the required aquatic ecological assessment.

**7. Comments on Conditions**

7.1 Although condition 26 refers to stream and/or wetland restoration plans as an advice note, I consider this adequate to ensure that the effects management hierarchy is followed to prevent loss of value or extent of stream or wetland results from upgrading of the transportation infrastructure enabled through the NoRs.

8. **Recommendations**

- 8.1 All General Arrangement Plans should show the location of streams and wetlands discussed in the Assessment of Ecological Effects report.
- 8.2 No additional conditions are considered relevant to district consenting matters.
- 8.3 I assume that effects on aquatic ecological features, including removal of vegetation in wetlands and the riparian yard will be considered during regional consenting processes and therefore recommend that the Advice Note in Proposed Condition 26 be retained.

# MEMO

To	Cheryl Cleary, Consultant Reporting Planner
From	David Russell
Date	14.02.2024
Subject	Technical Expert Evidence – for s.42A Report, South FTN NoR

## TECHNICAL EXPERT S.42A MEMO

### 1. Introduction

1.1 My name is David John Russell. I am a Senior Development Engineer and have been employed by Auckland Council since 2005. I have been involved with land development in a senior role since I joined Council originally in 1988. I have a BE(Civil) degree, graduating in 1976.

1.2 My role in the assessment of the South Frequent Transit Network Notice of Requirement ('South FTN NoR') is to comment on the utility company submissions, and other submission that raise matters regarding land use and development rules of the Auckland Unitary Plan: Operative in Part ('AUP: OP'). The latter work is based on my experience within Council as a development engineer, and looking at the impacts the projects have on the neighbouring landowners.

I attended the original soft lodgement meeting and walk over briefing and bus tour of the South FTN NoR route, held by the Te Tupu Ngātahi Supporting Growth (Te Tupu Ngātahi) consultants on 14 September 2023. I have also driven the various routes and walked parts to access the various submissions.

### 1.3 Code of Conduct

I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence and agree to comply with it when giving any oral evidence to the Hearing. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

1.4 I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## 2. Scope and Structure of Technical Memorandum

### 2.1 Subject Matter

This technical memo relates to the South FTN NoR by Auckland Transport, which consists of:

- South Frequent Transit Network: Great South Road FTN Upgrade (NoR 1)
- South Frequent Transit Network: Great South Road (Drury Section) (NoR 2)
- South Frequent Transit Network: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)
- South Frequent Transit Network: Takaanini FTN – Porchester and Popes Road Upgrades (NoR 4)

2.2 In this technical memo I address the submissions made by Chorus, Watercare, and Counties Energy including their concerns regarding a lack of involvement in the projects until after the design stage. I also address the Ministry of Education and Kāinga Ora - Homes and Communities (“Kāinga Ora”) submissions. I have read all of the submissions made to the South FTN NoR and make comment on issues raised in those submissions that are within my area of expertise, including nuisance, dust and driveway grades.

2.3 In preparing this technical memorandum, I have reviewed the following documents lodged in the South FTN NoR:

- i) South FTN – Assessment of Environmental Effects (AEE), 13 October 2023
- ii) South FTN – Appendix A, Assessment of Alternatives, 13 October 2023
- iii) South FTN – NoRs 1-4 Form 18, 13 October 2023
- iv) General Arrangement Drawings

## 3. Summary of key issues Raised in Submissions

3.1 The table below is a summary of the key development engineering issues raised in submissions, which I address in this technical memo:

Notice of Requirement	Key issues
South FTN: Great South Road FTN Upgrade (NoR 1)	<ul style="list-style-type: none"><li>i. Road is over designed</li><li>ii. Utility companies wish to be involved from now to construction so they can plan works and ensure existing infrastructure is protected</li><li>iii. Ministry of Education and Kāinga Ora primarily around access through the construction sites</li></ul>

Notice of Requirement	Key issues
South FTN: Great South Road (Drury Section) (NoR 2)	i. Utility groups as for NoR 1 ii. Ministry of Education and Kāinga Ora as for NoR 1
South FTN: Takaanini FTN – Weymouth, Alfriston, and Great South Road Upgrades (NoR 3)	i. Loss of road side parking ii. Utility groups as for NoR 1 iii. Ministry of Education and Kainga Ora as for NoR 1
South FTN: Takaanini FTN – Porchester and Popes road Upgrades (NoR 4)	i. Property accessibility as drive steepens ii. Utility providers, MoEd, Kainga Ora as for NoR 1

Table 1: Key Development Engineering Issues Raised in Submission on the South FTN NoR

- 3.2 Several submitters have raised matters covering noise, loss of front yards, loss of privacy, Vehicle manoeuvring issues, dust, personal inconvenience, and dust. These matters are addressed by other technical experts and do not have an engineering impact. Other submitters have considered the projects over designed, adding bus lanes where they already exist, not adequately connected to the existing road network. These matters are transport engineering related and fall to the Council's expert traffic engineer, Wes Edwards, to consider.
- 3.3 Some driveways are steep now and will need careful design to stay complying. These issues are covered by the Requiring Authority's Proposed condition 15. These property owners will also be able to be involved in the Stakeholder Communication and Engagement Management Plan (SCEMP) as part of condition 9 (b) (i) A.

#### 4. Comment on the Assessment of Effects by the Requiring Authority

- 4.1 I have read the Requiring Authority's AEE and particularly section 9.2 dealing with the construction methodology. The general approach is to develop and comply with the 9 Management Plans detailed in Section 9.2.1. At present an assessment for each has been provided to be refined for presenting as part of the outline plan of works to be provided as part of condition 7. At that point there will be more management plans to review and approve by the various experts.
- 4.2 I agree with the assessments of effects that were provided as they impact on the project and the construction works required. There will need to be some amendments to the conditions to reflect the submissions. As indicated above and in the utility company submissions the assessment conditions do not cover the period prior to the start of works very well. Each utility authority has proposed amendments to the Network Utility Management Plan (NUMP) condition 28. Refer to Watercare Services Ltd (Watercare) submission for an example of amendments requested by utility submitters. The change requested in the Watercare submission would bring the conditions in line with other recently granted NoR

decisions. The additional condition sought in the Watercare submission would set up a process whereby all utility operators and the Requiring Authority keep up to date with what is happening within the NoR area. This will help minimise any impacts on the Utility Companies activities to upgrade and maintain their infrastructure and the need to relocate the new services as part of the future works. This needs to be reflected in the final conditions.

- 4.3 The supporting technical documents to the NoR address the stormwater treatment requirements. The review of that facet of the projects has been carried out by Trent Sunich and I defer to his expertise in flooding matters. In general, I am happy that what is proposed complies with the AUP, although there may be some questions around compliance with the Network Discharge Consent. The latter matters can be addressed as part of the outline plan of works review.
- 4.4 Watercare’s submission refers to a Land Use Integration Process (LIP). Searching the AEE it is only referenced in section 10.4.5.2 “Operational (Traffic) noise”. This document is not reflected in any of the draft conditions. This needs to be corrected.
- 4.5 The AEE provided addresses the engineering issues covered in the AUP. The plans provided with the outline plan of works will provide the full technical detail that are covered in general terms in the NoR application. It is not appropriate to have all the technical details now as construction standards are likely to change with time.
- 4.6 I have read the technical memo provided by Peter Runcie, Council’s noise and vibration expert. I support the changes that he has proposed as they attempt to minimise the noise generated by the traveling vehicles, and the vibrations created by having an uneven surface.

**5. Submissions**

- 5.1 In Table 2 below I summarise the development engineering issues raised in submissions and note the number of submissions made to each NoR on that issue.

<i>Issues</i>		<i>Number of Submissions</i>
<i>Pre construction consultation effects (excluding social effects items)</i>	<i>NoR 1</i>	<i>5</i>
	<i>NoR 2</i>	<i>5</i>
	<i>NoR 3</i>	<i>5</i>
	<i>NoR 4</i>	<i>5</i>
<i>Construction Effects</i>	<i>NoR 1</i>	<i>5</i>
	<i>NoR 2</i>	<i>5</i>
	<i>NoR 3</i>	<i>5</i>
	<i>NoR 4</i>	<i>5</i>

*Table 2 Utility provider Issues raised in Submissions*

- 5.2 The five submitters referred to in Table 2 are:

- Watercare Services Ltd (Watercare)

- Counties Energy
- Chorus
- Kainga Ora
- Ministry of Education

- 5.3 Watercare, Counties Energy and Chorus have all made similar submissions. I refer to these submissions collectively as the 'utility providers submissions. The concerns raised in the utility providers submissions are (in summary):
- 5.4 Existing infrastructure is located within the proposed designation boundaries. It is important that plans for the upgrade of the road and in particular the "active mode facilities" accommodate existing network assets or provide for their replacement and access for their maintenance and possible upgrade. The infrastructure is critical in meeting the needs of the communities served and to accommodate changes and the future demands associated with urban growth.
- 5.5 All of the utility provider submitters have requested further consultation and detailed planning concerning matters which may impact the location and safe operation of their assets. This includes the possibility of the ground levels being altered in the location of existing underground services. They have requested ongoing involvement in the design phase to ensure that the assets are protected, and provisions made for new infrastructure.
- 5.6 The proposed conditions in Form 18 of the South FTN NoR are void of early consultation requirements. The utility provider submitters see this as an issue in that they are continuously updating their assets and see a real potential for new projects to need to be redone as part of the roading works.
- 5.7 Proposed Condition 28 is for a Network Utility Management Plan. However, this is only prepared as part of the construction work. There does appear to be logic in having a strategic outcomes plan to minimise the works carried out by the utility companies that need to be redone as part of the construction works. For example, this could stop a water main being laid at 600mm deep in the berm, that ends up under the future road where it needs to be 900mm deep. There are similar issues for the other utility operators. (Refer item 7.1). This should minimise the issues to be identified in the Network Utility Management Plan ("NUMP"), Stakeholder Communication and Engagement Management Plan ("SCEMP") and Land Use Integration Process ("LIP") plans.
- 5.8 The LIP plan is identified in Watercare's submission at paragraph 4.9. The Requiring Authority's proposed condition 3 Land Use Integration Process, set out in Form 18 of each NoR, is proposed as a process for the period between confirmation of the designation and the start of construction and its stated purpose is to encourage and facilitate the integration of master planning and land use development activity. The proposed LIP condition refers to a nominated contact being a point of contact for "a Developer or Development Agency" wanting to integrate their development plans or

master plans with the Requiring Authority. As such, the proposed LIP is not aimed at addressing coordination of works with network utility providers.

5.9 Counties Energy has also identified issues in their submission around perceived conflicts for their infrastructure maintenance and accessibility. The use of a Network Utility Strategic Outcomes Plan (NUSOP) plan would largely eliminate the issue. This would mean that utility operators would be consulted as part of the run up to the design phase to guide them on road position so that new infrastructure can be correctly located.

5.10 The utility provider submitters have noted that condition 28 NUMP has been changed from that of other NOR's. They have requested that condition 28 be amended to:

“(d) the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.”

5.11 This amendment would also meet the Watercare requested amendment in place of the new condition they have proposed.

5.12 The Kainga Ora submission raises in more detail the issue raised by a number of submitters dust, pedestrian access through the construction site, and vehicle access to their property.

5.13 I am of the opinion that proposed Condition 15 (Existing property access) adequately recognises the need for property access and the requirement to agree with landowners to get the vehicle access requirements correct.

5.14 In my opinion, proposed Condition 16 (Construction Environment Management Plan) needs to be amended to reflect the community need to “survive” the project. Many submitters have effectively said “buy me out so I can leave”. This is unlikely to happen but if the construction Environment Management plan is strengthened to include some off-site measurement stations that can record noise, dust and vibration then there will be quantitative data for accessing complaints under proposed Condition 17 (Complaints Register). It will be important to remember that these will be long construction period projects, so the standards adopted need to be reasonable. These matters are addressed in more detail by the Council's social impact assessment expert, Gilly Stewart.

5.15 In terms of the construction traffic management plan there are standards to allow neighbouring land owners to access their homes, and how to manage construction traffic. However, I cannot see anything about maintaining pedestrian access through the site during construction. This is important to allow the neighbourhood to stay connected. Refer 7.4 below.



## 6. Comment on Requiring Authority Proposed Conditions

- 6.1 I agree with most of the proposed conditions. However, there does appear to be two omissions.
- 6.2 In 7.2 and 7.3 below I have brought forward the utility company wish for a Network Utility Strategic Outcomes Plan (NUSOP), or, for an amendment to condition 28 (d) in the Network Utility Management plan to ensure that the Utility Companies are aware of the design process and can have an input on works they need to do in the NOR areas so that there is no unexpected surprises.
- 6.3 Section 7.4 below proposes an amendment to Condition 19 to ensure that pedestrian access is available through the site. There is nothing to detail what the plan is to cover. This matter needs to be clarified by the Requiring Authority in evidence at the hearing.

## 7. Recommendations

- 7.1 I recommend that a new condition be added or one amended, and that another condition be amended as detailed below.

### 7.2 Network Utility Strategic Outcomes Plan (NUSOP) (recommended new condition)

(a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable.

(b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time.

(c) The NUSOP shall:

- i) consider expected asset life of existing assets;
- ii) consider expected asset capacity increases or changes; and
- iii) demonstrate how city and national strategic plans are considered.

(d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare.

(e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed.

(f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP.

(g) Any amendments to the NUSOP related to the assets of a Network

This condition should allow all the utility companies and AT to work together prior to detailed design to ensure that new work is put in the correct long term position.

- 7.3 **Alternatively** condition 28 (d) in the Network Utility Management Plan should be

amended to read;

“(d) the development of the NUMP shall consider opportunities to coordinate future work programmes with other network utility operator(s) **during detailed design** where practicable.”

To achieve the same end.

- 7.4 **Pedestrian access.** An additional clause is needed in condition 19 Construction Traffic Management Plan to cover pedestrian access through the site for the neighbouring land owners, such as the following:

(xii) Details of safe pedestrian access through the site for the neighbours to utilise. Such pedestrian access to be maintained throughout that stage of the works to allow neighbouring landowners and visitors to access the properties

- 7.5 Seal Surface condition 29. I have reviewed the condition 29 proposed by Peter Runcie, Council’s noise and vibration expert and confirm that I support the recommended changes.

David Russell  
14 February 2024

**ATTACHMENT THREE**  
**SUMMARY OF SUBMISSIONS**



**Notice of Requirement - NoR 1 South Frequent Transit Network: Great South Road FTN Upgrade**

**Summary of Submissions**

Sub #	Submitter Name	Oppose/Support	Topic	Summary of Key Issues	Relief Sought
1.1	Johnathan Hong	Neutral	Property and land use effects	The property at 83C Great South Road is not affected it is just at the end of the boundary. Why not just take one property in front which is 83A and leave the rest alone.	Clarify why 83C Great South Road is affected.
2.1	Binay	Oppose	Traffic and transport effects	Submitter questions why lights are needed at the intersection near 473 Great South Road and Park Estate Road. The intersection is not very often by pedestrian and having lights will make it more difficult to get onto the road.	Increase the width of the road using the opposite farm nearby.
2.2	Binay	Oppose	Traffic and transport effects	Why are lights needed, the intersection is not very often by pedestrian and having lights will make it more difficult to get onto the road.	Leave Great South Road/Park Road intersection/part untouched and instead make a bus lane where cars can park during off-peak times/use as a way to get onto the main road.
2.3	Binay	Oppose	Noise and vibration effects	Lights will make car noise louder than it is especially at night with trucks.	If the original plan is to be used, clear indicator of how putting lights at the intersection will affect noise and what will be done to mitigate those effects.
3.1	Chander Investment Trust	Oppose	Property and land use effects	Submitter received a building consent to amalgamate 2 properties and build 9 terraced houses at 23 & 23A Great South Road, Manurewa. The NoR implies that submitter cannot use that consent. There is no timeline or budget allocation for the proposed work. Submitter is concerned their capital will be blocked for 5-10 years and consents will have expired.	Seeks compensation no as the 9 terraced housing development at 23 and 23A Great South Road Manurewa is no longer viable.

4.1	Iqbal Singh	Support	Property and land use effects	Submitter's property at 52B Great South road, Manurewa is not affected much it will just be the botheration when the work will start.	Submitter's property at 52B Great South road, Manurewa is not affected much it will just be the botheration when the work will start.
5.1	Dene Worsley Bowmar Margaret Anne Bowmar Judith Louise Tompsett	Oppose	Traffic and transport effects; Property and land use effects	NoR relating to 16 & 85 Great South Road, Manurewa is not needed. The proposed road design is over designed and poorly designed in sections. The cost of the proposal far outweighs the limited benefits which can be achieved within the existing road reserve. The proposal will cause unnecessary disruption to adjacent properties physically and financially.	Cancel or remove the NoR on 16 & 85 Great South Road, Manurewa or redesign to contain it within the existing road reserve.
5.2	Dene Worsley Bowmar Margaret Anne Bowmar Judith Louise Tompsett	Oppose	Traffic and transport effects	The goal of additional cycle lanes can be achieved within the existing road reserve and the lanes will not be a part of a continuous cycle lane servicing the whole area. There is no facility for cycle lanes to the north or south of the proposed road upgrade and it would be difficult along Great South Road to the north of Orams Road and through Manurewa township to the south.	Cancel or remove the NoR on 16 & 85 Great South Road, Manurewa or redesign to contain it within the existing road reserve.
5.3	Dene Worsley Bowmar Margaret Anne Bowmar Judith Louise Tompsett	Oppose	Property and land use effects	The proposed design specific to 16 Great South road shows a battering back from the road layout some 10m into the front yard and this would ruin the front yard and devalue the property. There is an existing retaining wall 1m behind the existing road boundary.	Cancel or remove the NoR on 16 & 85 Great South Road, Manurewa or redesign to contain it within the existing road reserve.
6.1	Fortune Building Management Ltd	Oppose	Property and land use effects	Submitter has consent and started building a 5 unit development at 31 Great South Road, Manurewa and NoR will take all of the land.	Reconsider the change of the road. Better access for motorway no Great South road.

7.1	CNS Healthcare	Oppose	Traffic and transport effects	Fiscally irresponsible due to a change in direction by local and central government in relation to public transport, RMA and Mill Road development which would be easier to build from scratch a bus corridor.	Put this on hold
8.1	SNP Limited	Oppose	Social Impacts	Fiscally irresponsible due to a change in direction by local and central government in relation to public transport, RMA and with the possibility of Mill Road happening.	Redo the business case
9.1	Wendy Gladys Wells	Support	Traffic and transport effects	The existing traffic lights at Great South Road and Mahia Road intersection only cover two lanes and not the one turning left into Mahia Road. An improvement	Make the intersection of Great South Road and Mahia Road, Manurewa safe
11.1	Bronwyn Brown	Oppose	Property and land use effects; Traffic and transport effects	Loss of front green space will have a negative impact on and devalue 1/326 Great South Road, Opaheke, Papakura. Mature planting, visitor car park area and part of common drive will be lost.	That the South FTN for Papakura does not proceed.
13.1	TRP Brown and B Brown	Oppose	Property and land use effects; Traffic and transport effects	Loss of front green space will have a negative impact on and devalue 1/326 Great South Road, Opaheke, Papakura. Mature planting, visitor car park area and part of common drive will be lost.	That the South FTN for Papakura does not proceed.

14.1	Telecommunication Submitters	Oppose	Network Utility Operations	The Network Utility Management Plan condition is not the same as has been agreed with the Airport to Botany and Northwest Transport Projects. The updated clause d inclusion of the wording "during detailed design" has not been included. Key to the outcomes the submitters seek is to ensure they are adequately consulted over effects on their existing infrastructure as well as being provided the opportunity to discuss any future requirements so they can be considered in the project design.	Amend the Network Utility Management Plan condition clause d to read: "(d) the development of the NUMP shall consider opportunities to coordinate future work programmes with out network utility operator(s) <u>during the further project stages including detailed design</u> where practicable."
14.2	Telecommunication Submitters	Oppose	Network Utility Operations	The 'design stage' is not an actual stage but is instead progressive and for clause d in the NUMP condition to be more effective it should be amended. It is reasonable for there to be provisions to ensure telecommunication works/opportunities are properly considered during the design phase through consultation with network utility operators. The AEE does not list all affected utility operators.	The outcomes the submitter seeks is to ensure they are adequately consulted by the requiring authority over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.
14.3	Telecommunication Submitters	Support	Network Utility Operations	Condition 2 Project Information will ensure the requiring authority will contact Spark directly as an affected landowner and Spark supports condition 2. Conditions 3,16, 21, 22 and 28 (subject to the proposed amendment) are also supported in regard to providing protection to the data centre during construction.	Retain Conditions 2 Project Information; Condition 3 Land Integration Process; Condition 16 Construction Environmental Management Plan; Condition 21 Construction Vibration Standards; Condition 22 Construction Noise and Vibration Management Plan and (subject to requested amendments) Condition 28 Network Utility Management Plan.



15.1	Marencia du Plessis	Oppose	Noise and vibration effects	The proposed project has more negative effects than positive effects, such as heavy trucks causing structural damage, dust and diesel waste. Noise disrupts sleep.	Reject the project.
15.2	Marencia du Plessis	Oppose	Property and land use effects	With the added dust and dirt in the air the submitters property will be dirty.	Proposes Council clean affected homes.
15.3	Marencia du Plessis	Oppose	Traffic and transport effects	The congestion problems are already high in the morning and afternoon and the proposal will add to it.	Reject the project.
15.4	Marencia du Plessis	Oppose	Lapse period; Social impacts	Not knowing how long this project is going to disturb our livelihoods is also causing a lot of worry and stress as it's unsustainable for the community.	Reject the project.
16.1	Carl Dean Howe	Oppose	Traffic and transport effects	The widening of the road to support proposed cycle lanes does not make sense as there is no demand.	We would like the plan for the lane to be abolished. Concentrate on upgrading public transport instead of wasting funds on unused cycleways.
16.2	Carl Dean Howe	Oppose	Traffic and transport effects	It will become more hazardous to pull out from the driveway as we will have to block the cycle lane while accessing the road.	We would like the plan for the lane to be abolished.
16.3	Carl Dean Howe	Oppose	Noise and vibration effects	We are concerned about the loss of a safe distance of the house from the road. Noise levels will increase as the distance to the house is reduced.	We would like the plan for the lane to be abolished.
17.1	Bunnings Ltd	Oppose	Traffic and transport effects	Bunnings has leasehold of land at 167-179 Great South Road, 1-7 Graham Road and 19 Waimana Road, Takanini. The submission relates to the upgrade of Great South Road, Taka Street and Walter Strevens Drive. Bunnings opposes the lack of detail provided with respect to the proposed median.	The detail of the proposed median be provided and the median be flushed so that access points of the Bunnings site is not affected.

17.2	Bunnings Ltd	Oppose	Property and land use effects	Bunnings has leasehold of land at 167-179 Great South Road, 1-7 Graham Road and 19 Waimana Road, Takanini. The submission relates to the upgrade of Great South Road, Taka Street and Walter Strevens Drive.	The designation boundary be amended to show the operational extent around what will be the legal road reserve and the construction extent (two separate designation boundaries).
18.1	Shamini Umasuthan	Neutral	Positive effects	Need for better infrastructure.	Need for better infrastructure.
19.1	Pathmavatheyy Govender	Oppose	Traffic and transport effects	The NoR will reduce the on-street parking available for properties within its path and this could mean some properties (357, 359 and 361 Great South Road, Papakura) have no on-street parking spaces making vehicle access impracticable.	Opposes the NoR for properties on Great South Road between Beach Road and Manse Road in its current form. Seeks explanation of how off-street parking will be maintained on residential properties affected by the NoR on Great South Road and Manse Road.
19.2	Pathmavatheyy Govender	Oppose	Traffic and transport effects	Further consideration should be given to using the Chisholm corner side of Great South Road for the works rather than the residential property side.	Explore expanding the NoR on the Chisholm corner side of Great South Road and reducing the NoR on the residential side of Great South Road to reduce the impact of works on residential properties.
19.3	Pathmavatheyy Govender	Oppose	Noise and vibration effects	The NoR may increase noise to properties as heavy traffic movements may be closer to residential properties.	Explain the noise mitigation measures residential properties affected by the NoR on Great South Road between Beach Road and Manse road.
19.4	Pathmavatheyy Govender	Oppose	Traffic and transport effects	It is unclear what public transport benefits will be compared to running public transport on existing road infrastructure. There is no detail on what these services would be and whether they will be funded. If the desired public transport services are not funded, the additional lanes may just be used by general traffic.	Request further modeling and detail on the public transport and commuter benefits that the South FTN NoR seeks e.g. increased bus services, estimated patronage for the bus lanes proposed.
19.5	Pathmavatheyy Govender	Oppose	Traffic and transport effects	Cycleway patronage in the area has seen limited uptake in the area. Other options should be considered e.g shared walkway rather than a dedicated cycleway.	Request further modeling and detail on the public transport and commuter benefits that the South FTN NoR seeks e.g. projected cycleway usage. Consider a shared walkway that cyclists could use rather than a dedicated cycleway.

20.1	Davinder Singh	Oppose	Property and land use effects; Social impacts	The notice mentions that the project is not currently funded and Auckland Transport is not seeking the purchase the submitter's house at 330 Great South Road, Opaheke anywhere within 10 to 30 years. This potential acquisition has created so much uncertainty for us.	Seeks more information from Auckland Transport regarding the Public Works Act purchase process.
21.1	Heritage New Zealand Pouhere Taonga	Oppose	Historic Heritage	HNZPT is concerned that there has not been adequate assessment of the notable trees (individual/groupings) for their historic heritage values.	HNZPT is concerned that there has not been adequate assessment of the notable trees (individual/groupings) for their historic heritage values.
21.2	Heritage New Zealand Pouhere Taonga	Oppose	Historic Heritage	HNZPT is supportive of the use of a historic heritage management plan condition to ensure the protection of historic heritage and mitigation to manage adverse effects.	HNZPT is supportive of the use of a historic heritage management plan condition to ensure the protection of historic heritage and mitigation to manage adverse effects.
21.3	Heritage New Zealand Pouhere Taonga	Oppose	Historic Heritage	HNZPT is concerned with the lack of assessment and mitigation of the built heritage values when it is intended there be modification and or the destruction of features within the extents of the Papakura Old Central School (R12/1154 and 14.1 Schedule \$02830) and the Papakura/Karaka WWI Memorial (14.1 Schedule #02801 and CHI#16003). As these effects are already known of, the mitigation of those effects should not be addressed through the HHMP.	Further historic heritage assessment is required to determine the effects of NOR 1 on Papakura Old Central School R12/1154 and 14.1 Schedule #02830) and the Papakura/Karaka WWI Memorial (14.1 Schedule #02801 and CHI#16003).

21.4	Heritage New Zealand Pouhere Taonga	Oppose	Historic Heritage	HNZPT is concerned with the lack of assessment and mitigation of the built heritage values when it is intended there be modification and or the destruction of features within the extents of the Papakura Old Central School (R12/1154 and 14.1 Schedule \$02830) and the Papakura/Karaka WWI Memorial (14.1 Schedule #02801 and CHI#16003). As these effects are already known of, the mitigation of those effects should not be addressed through the HHMP.	At a minimum the HHMP wording should be modified to specifically recognise and manage the historic heritage places already identified to be modified or destroyed as a result of NoR 1.
22.1	Restaurant Brands Limited	Oppose	Traffic and transport effects	Restaurant Brands the leaseholder of 86-99 Great South Road, Papakura and has rights to park on 84 Great South Road. Vehicle access for the submitter's KFC drive-through restaurant is from a 13m crossing to Subway Road. The NoR will have effects on the safe and efficient operation of the drive-through restaurant activity.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.
22.2	Restaurant Brands Limited	Oppose	Property and land use effects; Social impacts	There is uncertainty and it is unclear whether how much of the submitter's land is actually required for the designation. The designation boundaries are to be reviewed following completion of construction.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.
22.3	Restaurant Brands Limited	Oppose	Property and land use effects	The NoR necessitates the removal of the existing 8m high primary identification sign and 6.5m high lighting column that are integral to the safe and efficient operation of the drive-through restaurant.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.

22.4	Restaurant Brands Limited	Oppose	Urban design effects; Landscape and visual effects	It is unclear as to whether compliance with Standard H9.6.7 Landscaping of the Auckland Unitary Plan, which requires a landscape buffer of 2m, will be achieved with the reduction of the landscape buffer proposed in the NoR.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.
22.5	Restaurant Brands Limited	Oppose	Property and land use effects	It is unclear whether Auckland Transport will engage with landowners and occupants of affected sites as part of the preparation of the various construction management plans that are to be deferred to the outline plan stage.	It is essential that landowners and occupiers are engaged with throughout the works, particularly given the reliance on management plans that are to be prepared at a later date to manage construction effects.
22.6	Restaurant Brands Limited	Oppose	Network Utility Operations	The size and scale of the construction works will mean an increased risk of services being disrupted. Any interruption to the water supply would mean KFC restaurant cannot open.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.
22.7	Restaurant Brands Limited	Oppose	Noise and vibration effects	The KFC restaurant will inevitably be affected by an increase in the volumes of noise, dust, vibration and dirt on the building, car park and grounds. The quality of the customer experience is heavily reliant on optimal standards of hygiene and acoustic amenity.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.

22.8	Restaurant Brands Limited	Oppose	Traffic and transport effects	The construction phase has the potential to compromise the ability of delivery trucks to easily enter the site and staff and customer parking will be impeded. If not properly managed construction effects have the potential to compromise the safe, efficient and economical operation of the KFC drive-through restaurant. The submitter requests that the issues are addressed by imposing several environmental bottom lines within the conditions of the designation to ensure the potential adverse construction effects are appropriately avoided, remedied or mitigated.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.
22.9	Restaurant Brands Limited	Oppose	Lapse period; Social impacts	An extended lapse period of 15 years creates uncertainty which the statutory lapse period of 5 years seeks to avoid. While the submitter acknowledges the need for route protection, it does not agree to the imposition of a 15-year lapse period where there is no committed funding or certainty as to the timeframe for the construction of the works or commitment to give effect to the works within a reasonable timeframe.	Withdraw the requirement; or modify the requirement so that it does not include the submitters site; and impose conditions that ensure that any adverse effects on the submitter's activities (including but not limited to the adverse effects described in this submission) are avoided, remedied or mitigated.
23.1	Hansaben Patel	Oppose	Property and land use effects	The submitter opposes the NoR because it is contrary to or inconsistent with Part 2 and other provisions of the Resource Management Act 1991. The NoR will result in significant construction and operational adverse effects to the submitter's properties and these cannot be adequately avoided, remedied or mitigated.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.

23.2	Hansaben Patel	Oppose	Property and land use effects	The submitter owns 64 and 66 Great South Road Manurewa and 1 Grand Vue Drive Manurewa. The dairy at 64 Great South Road is affected by the NoR in its entirety and the owner will suffer the loss of this land and associated economic and other material impacts including from the resulting closure of the business.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.3	Hansaben Patel	Oppose	Alternative routes, sites and methods	Inadequate consideration has been given to alternative sites, routes and methods of undertaking the works.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.4	Hansaben Patel	Oppose	Social Impacts	Inadequate consideration has been given to alternative routes, sites and methods that would minimise the adverse effects on the local community resulting from the loss of the long-standing dairy operated from the site.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.5	Hansaben Patel	Oppose	Social Impacts	The submitter will suffer an additional loss of land and associated economic and other material impacts from the partial impact on the submitter's property at 66 Great South Road, Manurewa.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.6	Hansaben Patel	Oppose	Noise and Vibration effects	The submitter's property at 66 Great South Road and 1 Grande Vue Rd will be subjected to adverse construction effects including loss of amenity, adverse effects on access and significant traffic vehicle movements and adverse dust, noise and vibration effects.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.7	Hansaben Patel	Oppose	Landscape and visual effects; Aboricultural effects	The submitter's property at 66 Great South Road and 1 Grande Vue Rd will be subject to adverse landscape and visual amenity effects, including from clearance of mature vegetation.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.

23.8	Hansaben Patel	Oppose	Flooding effects	The submitter's property at 66 Great South Road and 1 Grande Vue Rd will be subject to adverse stormwater and flooding effects and the owner is concerned that increases in impervious surface area and associated changes to flows have not been adequately assessed.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.9	Hansaben Patel	Oppose	Property and land use effects	The cumulative effects on the submitter's 3 properties and the loss of development potential for intensive housing is a significant adverse effect that has not been adequately assessed.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns.
23.10	Hansaben Patel	Oppose	Lapse period; Social impacts	The long lapse period sought of 15 years, whereas the default lapse period under s.184 RMA is 5 years, would create significant uncertainty for the owner, other affected landowners and occupiers by effectively blighting land. A 15 year lapse period is not appropriate particularly where there is no funding or certainty as to the timing of construction of the proposed works.	Withdraw the NoR from the submitter's properties or in the alternative amend the NoR including by way of conditions to address the owners concerns; and the imposition of the 5 year statutory default lapse date.
24.1	Meenakshi Goyal	Oppose	Traffic and transport effects	The submitter owns 3/464 Great South Road, Papakura located at a T-point of Park Estate Road and Great South Road. The space around the house is just sufficient to maintain the safe distance between the road and the house and driveway and the NoR will reduce the distance between the road and the boundaries of the submitter's house and it will not feel safe.	Please leave the pedestrian/grass area open the way it is and accommodate your changes within the available road outlines only.



25.1	Esskay Holdings Limited	Oppose	Property and land use effects	<p>A huge chunk of the submitter's property (12 Great South Road Manurewa) is in the red zone. Precisely how much is affected is unknown and please advise. The proposal will adversely affect the submitter's development plans and the property will lose value. The look of the property will be ruined with no front yard left .</p>	<p>Submitter seeks reasons why only a few properties are affected and not all across Great South Road; what will the compensation be; why is the submitter's property affected more than others?</p>
26.1	Auckland Council - Parks and Community Facilities	Oppose	Open space effects	<p>The submitter is strongly opposed to NoR 1. Concerns are the direct effects on NoR 1 on properties at: 153R Great South Road; 165 Opaheke Road; 278 Great South Road; 287W Great South Road; 298 Great South Road; 312 Great South Road; 57R Wood Street; 58R Great South Road; 59R Wood Street; 69 Wood Street; as well as the indirect effects of NoR 1 on the properties at: 132 Great South Road; 16R Cooladerry Place; 286 Great South Road, Manurewa; 294 Great South Road, Papakura; 2R Creek street; 320R Great South Road; 329 Great South Road; 345R Great South Road; 36 Coles Crescent; 473R Great South Road; 9R Buncrana Place; ESPLND RES 149 Great South Road; SRVCE LANE 18 East Street; SRVCE LANE 71 Great South Road; and 11R O'Shannessey street. The loss of public open space, park land and assets are of concern, particularly the properties directly affected.</p>	<p>Submitter seeks all effects on the properties listed in the submission are avoided, so that the public open features and assets are preserved and maintained, and/or fully reinstated to the same or a better condition. If the effects cannot be avoided, then mitigate or remedy the loss of public open space and assets so that the same or more public open space is provided in a strategic location that is in proximity the areas taken by NoR 1.</p>

27.1	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Positive effects	The submitter supports the provision of providing transport choices and encouraging mode shift to sustainable transport modes as the population of South Auckland continues to grow through the South FTN. The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.	The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.
27.2	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Lapse period	A lapse date of 15 years is a significant period when impacting land owned by others. This lapse date should be reduced to a maximum of 5-10 years.	The lapse date should be reduced to a maximum of 5-10 years.
27.3	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	There is potential for existing schools, or any future schools developed in this area to be affected by traffic, noise and other nuisance effects from future construction work. The submitter seeks to ensure that appropriate conditions are included in the designations to mitigate any adverse effects with the construction of the South FTN.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.
27.4	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Other	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs. The submitter supports the terms used in the NoR: Educational facility; stakeholder.	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs.

27.5	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Traffic and transport effects	Condition 19 requires the preparation of a Construction Traffic Management Plan (CTMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.
27.6	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	Condition 22 and 23 requires the preparation of a Construction Noise Vibration Management Plan (CNVMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.	The submitter supports the inclusion of proposed conditions 22 and 23 Construction Noise Vibration Management Plan, but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.

27.7	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Urban design effects	The submitter supports the establishment of Stakeholder Communication and Engagement Management Plan (SCEMP) (condition 9). However, the submitter considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools.	Seeks amendments to conditions to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing. This includes the requirement that at least 6 months prior to construction, the requiring authority shall identify a list of stakeholders, properties, and identify methods to engage with stakeholders and submit this record with any Outline Plan of Works for the relevant stage of work.
28.1	Counties Energy Limited	Support	Positive effects	The submitter is generally supportive of the proposed road and facility upgrades indicated on the NoR 1 drawings.	The submitter is generally supportive of the proposed road and facility upgrades indicated on the NoR 1 drawings.
28.2	Counties Energy Limited	Support	Network Utility Operations	It is important that plans for the upgrade of the road, and in particular the 'active mode facilities' accommodate existing network assets or provide their replacement and access for their maintenance and possible upgrade. Existing underground and ground mounted electricity infrastructure within NoR 1 drawings 4106, 4107 is low voltage cables and equipment associated with underground electricity reticulation located in the back berm.	The submitter requires further consultation and detailed planning concerning parts of NoR 1 to address matters which may impact the location and safe operation of the assets listed in the submission.

28.3	Counties Energy Limited	Support	Network Utility Operations	<p>It is important that plans for the upgrade of the road, and in particular the 'active mode facilities' accommodate existing network assets or provide their replacement and access for their maintenance and possible upgrade.</p> <p>Existing underground and ground mounted electricity infrastructure within NoR 1 drawings 4106, 4107 is low voltage cables and equipment associated with underground electricity reticulation located in the back berm.</p>	Further consultation and detailed planning will be required where it is proposed to alter the ground level in the vicinity of the submitter's underground assets.
28.4	Counties Energy Limited	Support	Network Utility Operations	<p>The submitter has an existing overhead 22kV line with under built LV overhead conductors on the east side of Great South Road, which have not been shown on NoR 1 drawing 4107.</p>	The submitter's existing overhead 22kV line with underbuilt LV overhead conductors must be retained at present.
28.5	Counties Energy Limited	Support	Network Utility Operations	<p>Drawing 4107 indicates areas of fill under and around the submitter's 22kV line and associated poles.</p>	The submitter will require confirmation that proposed earthworks comply with the requirements of NZECP34:2001 (New Zealand Code of Practice for Electrical Safe Distances).
28.6	Counties Energy Limited	Support	Network Utility Operations	<p>The submitter has an existing overhead 22kV line with under built LV overhead conductors on the east side of Great South Road, which have not been shown on NoR 1 drawing 4107.</p>	Demonstration of compliance with NZECP34 will be required should the submitter's 22kV line remain overhead when the new (wider) bridge indicated in drawing 4107 is installed over Slippery Creek.
28.7	Counties Energy Limited	Support	Network Utility Operations	<p>The submitter has an existing overhead 22kV line with under built LV overhead conductors on the east side of Great South Road, which have not been shown on NoR 1 drawing 4107.</p>	Provision should be made within the bridge structures indicated in NoR 1 drawing 4107 for future undergrounding of the submitter's 22kV line.

29.1	Watercare Services Limited	Neutral	Network Utility Operations	Some of the NoRs interact with the submitters existing water and wastewater assets. Some of the project areas for the NoRs are within areas where the submitter has planned for future infrastructure development.	The submitter seeks to ensure that any decisions made on the NoRs respond to the issues in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services now and in the future.
29.2	Watercare Services Limited	Neutral	Network Utility Operations	The submitter plans to install new wastewater infrastructure in the Opaheke Future Urban Zone, which will require the installation of a new wastewater rising main to convey flows from east to west. The preferred alignment is yet to be confirmed but could intersect with the proposed designation at the Otuwairoa/Slippery Creek Bridge.	The submitter seeks early engagement from the requiring authority for future planning and construction works including prior to detailed design and during implementation of construction works. For the submitter this includes applying for, in a timely manner, 'Works Over' Approvals, in compliance with the submitter's 'Water Supply and Wastewater Network Bylaw 2015 (Updated 2021).
29.3	Watercare Services Limited	Neutral	Network Utility Operations	The NoRs interact with existing water and wastewater services.	The submitter seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future, that it has access 24/7 for maintenance, safety and efficient operation of its services and that it is consulted on any works that may impact the submitter's services.

29.4	Watercare Services Limited	Neutral	Network Utility Operations	<p>The submitter supports the intention of proposed conditions which seek to ensure that there is early engagement with relevant stakeholders during the development of the four NoRs (i.e. the conditions which require a Network Utility Management Plan, Stakeholders Communication and Engagement Management Plan and the Land Use Integration Process) but considers amendments are required so that the conditions adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.</p>	<p>The submitter seeks a new condition requiring the preparation of a '<u>Network Utility Strategic Outcomes Plan</u>' (NUSOP): (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable. (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time. (c) The NUSOP shall: i. consider expected asset life of existing assets; ii. consider expected asset capacity increases or changes; and iii. Demonstrate how city and national strategic plans are considered. (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare. (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed. (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP. (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.</p>
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29.5	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks amendments to conditions so that they adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.	<p>If the amendment sought in submission 29.4 is not included, the submitter seeks amendment to the NUMP condition: (a) A NUMP shall be prepared <u>after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and</u> prior to the lodgement of an Outline Plan of Works for a stage of construction <del>Start of Construction for a Stage of Work</del>... (c) the NUMP shall be prepared in consultation... and shall include any s.177 consents required for works affecting prior Designations and Watercare 'Works Over Approvals'. (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.</p>
29.6	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks to ensure that the decisions made on the NoRs responds to the issues raised in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services.	The submitter seeks amendments to the conditions to ensure any adverse effects on its assets and operations are avoided, remedied or mitigated and to address concerns set out in the submission.



30.1	Z Energy Limited	Oppose	Property and land use effects	The submitter operates a Z Service Station and has a longterm lease at 166 Great South Road, Takanini and opposes the NoR as relates to the site, including the significant loss of site features and facilities and consequential layout of the sites that will adversely affect the operation of the service station and likely render the service station inoperable. The project does not promote the purpose and principles of Part 2 RMA, does not adequately identify or address significant adverse effects under s.171(1) RMA, and the benefits have not been demonstrated as outweighing the adverse effects.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission.
30.2	Z Energy Limited	Oppose	Cumulative effects	The Taka Street changes will tie into the Takaanini Level Crossing project under a separate NoR and the cumulative effects on the service station should be reviewed in tandem.	The Taka Street changes will tie into the Takaanini Level Crossing project under a separate NoR and the cumulative effects on the service station should be reviewed in tandem.
30.3	Z Energy Limited	Oppose	Flooding effects	The permanent road corridor upgrades and designation boundary encroach beyond a number of critical site features including access points, landscaping, signage, carwash entrance, water tanks and stormwater infrastructure including the interceptors. The designation boundary also runs within the forecourt and canopy.	Decline the NoR in its current form or amend to avoid, remedy or mitigate all matters of concern raised in the submission, including minimising the encroachment of the designation boundary into the submitter's sites and ensuring that any temporary or permanent effects do not impact the ability to safely operate, including with regard to access/egress, all-vehicle maneuvering, parking, stormwater treatment and drainage, storage of hazardous substances, the forecourt canopy, signage and landscaping.

30.4	Z Energy Limited	Oppose	Traffic and transport effects	The NoR will require a redesign of both accesses which could result in adverse safety effects, including on tanker tracking curves, and affect the wider site layout.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient: entry and exit crossings including the ability to turn right in and out of the site, tanker access to and from the site and the remote fill points, on-site maneuvering.
30.5	Z Energy Limited	Oppose	Landscape and visual effects; Urban design effects	In order to remain compliant with the 2m front yard landscaping requirement under the AUP, the removal of existing structures may be necessary.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including ensuring that any resultant changes will not result in the submitter being able to operate its sites lawfully.
30.6	Z Energy Limited	Oppose	Property and land use effects	The conditions should provide more specific recognition of matters that need to be addressed at detailed design stage, relating to consultation with affected landowners and occupiers; and the extent to which feedback from affected landowners, leaseholders or occupiers is taken into account.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including ensuring that works are appropriately managed through conditions. This includes requirements to engage with the submitter in relation to both temporary construction effects and the final form of the corridor. The submitter has a particular interest in the following management plans: Stakeholder Communication and Engagement Plan; Urban and Landscape Design Management Plan; Construction Environmental Management Plan; Construction Traffic Management Plan; Construction Noise and Vibration Management Plan.

30.7	Z Energy Limited	Oppose	Property and land use effects	The proposed conditions rely heavily on a range of management plans to address effects. The extent to which feedback from consultation with affected landowners, leaseholders or occupiers is taken into account is unclear and there should be a clear requirement that feedback be considered and implemented to the extent practicable by the requiring authority.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including ensuring that works are appropriately managed through conditions. This includes requiring Council certification that management plans achieve the specified outcomes and are not simply submitted for information.
30.8	Z Energy Limited	Oppose	Lapse period; Social impacts	The lengthy timeframes of a total construction duration of 2-3 years and a lapse period of 15 years, coupled with the indicative design approach of the NoR present uncertainties for the submitter and its ability to plan for the site, with corresponding adverse social and economic effects.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including amending the lapse period to 5 years, consistent with s.184 RMA.
30.9	Z Energy Limited	Oppose	Property and land use effects	The use of the phrase "or as otherwise practicable" is unclear in the context of proposed condition 4 (Designation Review) and leave the requirement to roll back too open.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including amending proposed Condition 4 (Designation Review) to: 'The Requiring Authority shall as soon as practicable, and otherwise within 12 months of Completion of Construction for each Stage of the Project...'
30.10	Z Energy Limited	Oppose	Property and land use effects	As drafted proposed Condition 8 (Management Plans) does not require the requiring authority to incorporate feedback from stakeholders.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including amending proposed Condition 8 (Management Plans) to require that the summary of comments received (required by 8(a)(iv) demonstrates how, as far as practicable, the feedback from stakeholders has been incorporated.

30.11	Z Energy Limited	Oppose	Property and land use effects	The conditions should provide more specific recognition of matters that need to be addressed at detailed design stage, relating to consultation with affected landowners and occupiers; and the extent to which feedback from affected landowners, leaseholders or occupiers is taken into account.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including proposed Condition 9 (SCEMP) should be amended to include the requirement to prepare a schedule of sites affected and site-specific matters identified in the schedule to be addressed through consultation (refer to the Joint Witness Statement (Planning-Conditions) dated 20 September 2023 submitted to the Hearing Panel for the NW NoRs.
30.12	Z Energy Limited	Oppose	Urban design effects	The conditions should provide more specific recognition of matters that need to be addressed at detailed design stage, relating to consultation with affected landowners and occupiers; and the extent to which feedback from affected landowners, leaseholders or occupiers is taken into account.	The submitter supports proposed Condition 12(d) ULDMP.
30.13	Z Energy Limited	Oppose	Traffic and transport effects	It is not always just a landowner who may be affected.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including proposed Condition 15 (Existing property access) should refer to occupiers and leaseholders.
30.14	Z Energy Limited	Oppose	Property and land use effects	Proposed Conditions 16 (CEMP) and 19 (CTMP) do not require consultation or engagement with any party in their preparation. It is unclear from the SCEMP condition if these management plans are to be prepared in consultation with affected parties.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including either amending proposed Conditions 16 (CEMP) and 19 (CTMP) to require affected parties to be engaged with to participate in the drafting of these management plans or amending the SCEMP condition (proposed Condition 9) so that this requirement is clear.

31.1	Kāinga Ora Homes and Communities	Support in part	Positive effects	The submitter supports the outcomes to be derived from the Project.	Supports the NoR in part subject to the relief sought and matters raised in the submission being addressed.
31.2	Kāinga Ora Homes and Communities	Support in part	Social Impacts	The submitter generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.	Generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.
31.3	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Further information is required in relation to bus priority measures including dedicated bus lanes and priority at intersections.	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.
31.4	Kāinga Ora Homes and Communities	Support in part	Lapse period; Social impacts	Further information is required in relation to reducing the lapse period from 15 to 10 years. The submitter seeks a lapse period of 10 years to encourage the project to be actioned with more urgency and in an integrated manner.	Amend Condition 5 Lapse from 15 years to 10 years to provide greater certainty and for the project to benefit communities sooner.
31.5	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Further information is required in relation to operational noise and vibration best practical option for PPFs identification and assessment; mitigation at source to within 55 dB $L_{Aeq(24h)}$ ; low noise road surface to be implemented on all roads within the designation and building modification for all PPFs to 40dB $L_{Aeq(24h)}$ inside buildings.	The operational noise levels for this project shall not exceed 55 dB $L_{Aeq(23h)}$ beyond the boundaries of the designation or, where exceeded at a sensitive receiver, mitigation is provided.

31.6	Kāinga Ora Homes and Communities	Support in part	Part 2 RMA	Amendments to the designation conditions and/or the design of the Project are sought to address the concerns of the submitter.	In the absence of the relief sought in the submission the submitter considers that the NoR is contrary to sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 RMA; and will impact on the ability of people and communities to provide for their social, economic and cultural wellbeing.
31.7	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Integration with existing sections of bus lanes along the proposed FTN corridors should be demonstrated, including whether the designation has covered sufficient spatial extent to accommodate dedicated bus provision at approaches to major intersections.	The extent of the bus lanes are shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.
31.8	Kāinga Ora Homes and Communities	Support in part	Urban design effects; Traffic and transport effects	Condition 12 (Urban and Landscape Design Management Plan) should be amended to provide for buses and a more integrated, efficient and higher-capacity public transport network.	Amend Condition 12 Urban and Landscape Design Management Plan to provide for buses and a more integrated, efficient and higher-capacity public transport network and amend 12(g): "The ULDMP(s) shall include: (iii)...(f) Integration of passenger transport <u>including the provision of dedicated bus lanes and demonstrating that direct bus services can occur through major intersections.</u>

31.9	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter's tenants often have complex needs and are highly sensitive to noise, vibration and disruption and operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants. WHO guidelines (cited in the submission) identify adverse health effects of road traffic.	A condition requiring operational noise levels to not exceed 55 dB $L_{aeq(24h)}$ beyond the boundaries of the designation or where exceeded at a sensitive receiver, mitigation is provided.
31.10	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Condition 25 (Low Noise Road Surface) is amended to require the use of low noise and vibration road surfaces for all road surfaces in the designation unless further information confirms this is not warranted from a health and safety perspective.
31.11	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Where mitigation is applicable to PPFs the offer for mitigation shall be extended as per its recommended conditions in Appendix A.
31.12	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The proposed conditions freeze the receiving environment to what exists currently, ignores the future receiving environment.	The proposed conditions should be revised to require a BPO assessment prior to construction in the future that recognises the receiving environment as it exists at the time.

31.13	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Amend conditions 29-31 (Operational Conditions) as per Appendix A of the submission to address Best Practical Option (BPO) for PPFs identification and assessment; low noise road surface to be implemented on all roads within the designation; and building modification mitigation for all PPFs to 40 dB L <sub>Aeq(24h)</sub> inside buildings.
31.14	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 29 Low Noise Road Surface: (b) Any future resurfacing works of the Project shall be undertaken in accordance with the <u>BPO as determined in accordance with these conditions and Auckland Transport Reseal Guidelines...</u> and asphaltic concrete surfacing (or equivalent low road surface) shall be implemented where: <del>(i) The volume of traffic exceeds 10,000 vehicles per day;</del> or (ii) <u>The road is located within the designation; or</u>
31.15	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 31 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (time of lodging the OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
31.16	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 32 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>



31.17	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 33: ...adopting the Best Practicable Option <del>in accordance with NZS 6806 prior to implementation.</del> <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
31.18	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 34: The Detailed Mitigation Options shall be implemented...within twelve months of completion of construction, <u>subject to confirmation that during this 12 month period road traffic noise will remain compliant with the noise categories adopted for the NoRs and subject to confirmation that this approach is therefore the BPO, and that there are no other viable options that would permit the low road noise surface to be installed on opening.</u>

31.19	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	<p>Amend condition 35: Prior to the Start of Construction, a Suitably Qualified Person shall identify those dwellings which, following implementation of all the Detailed Mitigation Options, <del>will not be Noise Criteria Categories A or B and where</del> would still require Building-Modification Mitigation <del>might be required</del> to achieve 40 dB L<sub>Aeq(24h)</sub> inside Habitable Spaces (<del>'Category C Buildings'</del>). <u>For those PPFs, following the process set out in Conditions 36 to 41, it shall be determined which Building Modification Mitigation is required to achieve 40 dB LAeq(24h) inside habitable spaces.</u></p> <p><u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 2 PPFs and their classifications, to include future planned PPFs. Any future residential or other PPFs provided for in the AUP:OP zonings shall have a BPO assessment undertaken, including mitigation measures within the Project design where practicable.</u></p>
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31.20	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>vicinity of each <del>Category C</del> Building <u>requiring building-modification mitigation</u>, the Requiring Authority shall write to the owner of the <del>Category C</del> Building..If the building owner agrees to entry within <del>six</del> <u>three</u> months...building envelope. <u>If after 6 months following the date of the requiring authority's letter, no response has been received, the Requiring Authority shall again write to the owner of the Building requesting entry to assess the noise reduction performance of the existing building envelope. If the building owner agrees to entry within six months of the date of the Requiring Authority's letter, the Requiring Authority shall instruct a Suitably Qualified and Experienced Person to visit the building and assess the noise reduction performance of the existing building envelope. A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of the OPW) , and revision of the Schedule 2 PPFs and their classifications, to include future planned PPFs. Any future residential or other PPFs provided for in the AUP:OP zonings shall have a BPO assessment</u></p>
31.21	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>Amend condition 37: For each <del>Category C</del> Building <u>requiring Building-Modification Mitigation</u> identified, the Requiring Authority is deemed to have complied with Condition 36 above if...(c ) The building owner did not agree to entry within <del>six</del> <u>three</u> months of the date of the Requiring Authority's <u>last</u> letter.... If any of (b) to (d) above apply to a <del>Category C</del> Building, the Requiring Authority is not required to implement Building-Modification Mitigation to that building.</p>

31.22	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 38: Subject to Condition 37 above,....write to the owner of each <u>Category C Building requiring Building-Modification Mitigation</u> advising:...(b) The options available, <u>at the cost of the Requiring Authority</u> , for Building-Modification Mitigation...(c) That the owner has <u>24 three-months from completion of construction of the relevant section of the project</u> to decide whether to accept...more than one option is available.
31.23	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 39: Once an agreement on Building-Modification Mitigation is reached between the Requiring Authority and the owner of a <u>Category C Building requiring Building-Modification Mitigation</u> , the mitigation shall be implemented <u>at the Requiring Authority's expense</u> ,....
31.24	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 40: (c) The building owner did not accept the Requiring Authority's offer to implement Building-Modification Mitigation <u>within 24 months of completion of construction of the relevant section of the Project; three-months of the date of the Requiring Authority's letter sent in accordance with Condition 37 (including where the owner did not respond within that period)</u> ; or (d) The building owner cannot, after reasonable enquiry, be found <u>within 24 months of the prior to completion of construction of the Project</u> .

31.25	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend Condition 41: The Detailed Mitigation Options shall be maintained <u>by the Requiring Authority</u> so they retain their noise reduction performance as far as practicable.
32.1	Manurewa Business Association Incorporated	Oppose	Positive effects	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.
32.2	Manurewa Business Association Incorporated	Oppose	Submission period	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.
32.3	Manurewa Business Association Incorporated	Oppose	Urban design effects	Supports the intent to demonstrate appropriate integration of the Manurewa Town Centre with active mode pathways.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
32.4	Manurewa Business Association Incorporated	Oppose	Social Impacts	Is concerned about business interruption due to construction works, temporary and permanent designations.	Requests that unit owners and local businesses who are impacted are supported to relocate and fair value is compensated for losses.
32.5	Manurewa Business Association Incorporated	Oppose	Urban design impacts	Notes that blocking and bypassing the southern entrance and exit of Southmall is contradictory to the Town Centre integration intended by the FTN.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

32.6	Manurewa Business Association Incorporated	Oppose	Traffic and transport effects	Notes the ambiguity regarding proposed changes to the Weymouth Road overbridge - whether it will be widened or the existing bridge will have new configurations on the road.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
32.7	Manurewa Business Association Incorporated	Oppose	Flooding effects	Notes a lack of clarity around existing utilities including drainage being upgraded.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
32.8	Manurewa Business Association Incorporated	Oppose	Traffic and transport effects	Notes a lack of consideration has been given to existing ground leases, carparks, easements and connections that enable the accessibility of all modes of transport traffic to businesses.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
33.1	Southmall Manurewa	Support	Positive effects	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.
33.2	Southmall Manurewa	Oppose	Submission period	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.
33.3	Southmall Manurewa	Oppose	Urban design effects	Supports the intent to demonstrate appropriate integration of the Manurewa Town Centre with active mode pathways.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
33.4	Southmall Manurewa	Oppose	Social Impacts	Is concerned about business interruption due to construction works, temporary and permanent designations.	Requests that unit owners and local businesses who are impacted are supported to relocate and fair value is compensated for losses.

33.5	Southmall Manurewa	Oppose	Urban design effects	Notes that blocking and bypassing the southern entrance and exit of Southmall is contradictory to the Town Centre integration intended by the FTN.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
33.6	Southmall Manurewa	Oppose	Traffic and transport effects	Notes the ambiguity regarding proposed changes to the Weymouth Road overbridge - whether it will be widened or the existing bridge will have new configurations on the road.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
33.7	Southmall Manurewa	Oppose	Flooding effects	Notes a lack of clarity around existing utilities including drainage being upgraded.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
33.8	Southmall Manurewa	Oppose	Traffic and transport effects; Property and land use effects	Notes a lack of consideration has been given to existing ground leases, carparks, easements and connections that enable the accessibility of all modes of transport traffic to businesses.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
33.9	Southmall Manurewa	Oppose	Traffic and transport effects; Urban design effects	Will be negatively impacted by the loss of carparks.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

33.10	Southmall Manurewa	Oppose	Urban design effects	The submitter can guide future development opportunities to have a greater beneficial outcomes for Southmall, the Manurewa Town Centre, the FTN and the community and suggests an alternative solution for a transit oriented development that would meet the intent of the FTN to integrate with the Manurewa Town Centre and further enhance accessibility, connectivity and multiple modes of transport.	Seeks a public private partnership to develop a mixed use multilevel building on the corner of the Southern end of the Southmall carpark and Weymouth Road.
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**Notice of Requirement - NoR 2: South Frequent Transit Network: Great South Road FTN Upgrade (Drury section)**

**Summary of Submissions**

<b>Sub #</b>	<b>Submitter Name</b>	<b>Oppose/Support</b>	<b>Topic</b>	<b>Summary of Key Issues</b>	<b>Relief Sought</b>
1.1	Broshmik Investments Limited and Willian Rudsits	Oppose	Property and land use effects	The General arrangement involves removing vegetation, batter supports and an upgraded culvert. The work extends into 2/260 Great South Road, Drury, and reduces the main entrance. The extended culvert now intrudes into the land.	That all works remain outside the legal boundary of 2/260 Great South Road, Drury. That retaining walls are adopted to support the road and adjoining boundary and not batter slope.
1.2	Broshmik Investments Limited and Willian Rudsits	Oppose	Traffic and transport effects	The proposal does not allow roadside parking for visitors to 2/260 Great South Road, Drury, and future business.	The traffic ingress and egress turning must be retained.
1.3	Broshmik Investments Limited and Willian Rudsits	Oppose	Property and land use effects	More thought is needed with the adjoining paper road land, such as amalgamation of land with 2/260 Great South Road, Drury.	Better use of the adjoining paper road, road stop and amalgamate with 2/260 Great South Road, Drury.
2.1	Dunford Family Trust, David Dunford and Jayne Dunford	Oppose	Property and land use effects	The General arrangement involves removing vegetation, batter supports and an upgraded culvert. The work extends into 1/260 Great South Road, Drury and affects security fencing and container storage area.	That all works remain outside the legal boundary of 1/260 Great South Road, Drury. Road engineer designs should adopt retaining walls and not batter slope in design around the creek.
2.2	Dunford Family Trust, David Dunford and Jayne Dunford	Oppose	Traffic and transport effects	The proposal does not replace roadside parking which is currently relied upon by visitors to and business at 1/260 Great South Road, Drury.	Public roadside car parking is retained at 1/260 Great South Road, Drury.

2.3	Dunford Family Trust, David Dunford and Jayne Dunford	Oppose	Traffic and transport effects; Property and land use effects	The General arrangement involves removing vegetation, batter supports and an upgraded culvert. The work extends into 1/260 Great South Road, Drury and affects security fencing and container storage area.	Current vehicle traffic ingress and egress turning should not be impeded.
3.1	Blue Snow (2015) Limited	Oppose	Property and land use effects; Social impacts	The submitter is concerned with impacts on 263, 267, 271 and 275 Great South Road, Drury. The designation boundary is drawn hard up against the buildings that house trade services (Electrical, Plumbing and Maintenance supplies & services) and the front yard is a key access area for customers and staff and used for parking, goods collection. The proposal would mean the businesses would have to close and employment of 27 people would be directly impact and 25 families affected, as well as shareholders, customers and suppliers.	Seeks the proposed designation boundary be redrawn along the submitter's existing property boundary to the south of the submitter's buildings parallel to the existing road (refer drawing page 5 of submission).
3.2	Blue Snow (2015) Limited	Oppose	Traffic and transport effects	The submitter is concerned with impacts on 263, 267, 271 and 275 Great South Road, Drury. The designation boundary is drawn hard up against the buildings that house trade services (Electrical, Plumbing and Maintenance supplies & services) and the front yard is a key access area for customers and staff and used for parking, goods collection.	Change the proposed designation boundary to the opposite side of Great South Road, Drury, using vacant land.

3.3	Blue Snow (2015) Limited	Oppose	Traffic and transport effects	The submitter considers that from observing the drawings from Waka Kotahi, Drury Interchange (copy provided on page 6 of submission), building new lanes to the south of the existing road and bridge would better line up with the new Drury Interchange lanes.	Design and build the 2 new lanes for the road to the south side of the existing 2 land road.
3.4	Blue Snow (2015) Limited	Oppose	Traffic and transport effects	The submitter considers that from observing the drawings from Waka Kotahi, Drury Interchange (copy provided on page 6 of submission), building new lanes to the south of the existing road and bridge would better line up with the new Drury Interchange lanes.	Seeks that the widening the existing bridge across the Hingaia Stream be built to the south of the existing bridge, hence lining up with the Great South Road widening and Drury Interchange.
4.1	Telecommunication Submitters	Oppose	Network Utility Operations	The Network Utility Management Plan condition is not the same as has been agreed with the Airport to Botany and Northwest Transport Projects. The updated clause d inclusion of the wording "during detailed design" has not been included. Key to the outcomes the submitters seek is to ensure they are adequately consulted over effects on their existing infrastructure as well as being provided the opportunity to discuss any future requirements so they can be considered in the project design.	Amend the Network Utility Management Plan condition clause d to read: "(d) the development of the NUMP shall consider opportunities to coordinate future work programmes with out network utility operator(s) <u>during the further project stages including detailed design</u> where practicable."

4.2	Telecommunication Submitters	Oppose	Network Utility Operations	The 'design stage' is not an actual stage but is instead progressive and for clause d in the NUMP condition to be more effective it should be amended. It is reasonable for there to be provisions to ensure telecommunication works/opportunities are properly considered during the design phase through consultation with network utility operators. The AEE does not list all affected utility operators.	The outcomes the submitter seeks is to ensure they are adequately consulted by the requiring authority over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.
4.3	Telecommunication Submitters	Support	Conditions	Condition 2 Project Information will ensure the requiring authority will contact Spark directly as an affected landowner and Spark supports condition 2. Conditions 3,16, 21, 22 and 28 (subject to the proposed amendment) are also supported in regard to providing protection to the data centre during construction.	Condition 3 Land Integration Process; Condition 16 Construction Environmental Management Plan; Condition 21 Construction Vibration Standards; Condition 22 Construction Noise and Vibration Management Plan and (subject to requested amendments) Condition 28 Network Utility Management Plan.
5.1	Andromeda Miers trust Partnership	Oppose	Property and land use effects	The proposed designation boundary will significantly affect the function of the commercial property at 257 Great South Road, Drury, as a veterinary clinic, in terms of access and parking, and clinic appearance.	Seeks that the majority of the road works take place on the south side of the road, or that the designated boundary not impinge on 257 Great South Road, Drury at least in terms of the placement of cycle and pathways.
6.1	Active Electrical Suppliers (Drury)	Oppose	Property and land use effects	The proposed designation will effectively close the submitter's business at 271 Great South Road, Drury. It will affect the parking spaces at the front of the building.	Maintain access to 271 Great South Road, Drury, including private parking so that our business and neighbouring businesses can keep trading.

6.2	Active Electrical Suppliers (Drury)	Oppose	Traffic and transport effects	The logical place for the building site is the other side of Great South Road where there is space and where the additional lanes are being added.	The logical place for the building site is the other side of Great South Road where there is space and where the additional lanes are being added.
7.1	Kiwi Property No.2 Limited	Support	Traffic and transport effects	The submitter supports the purpose of NoR 2 to provide a multi-modal transport corridor and seeks clarification whether the cycleway will be provided on the southern side as well as the northern side of Great South Road as part of the South FTN upgrades.	Seeks that the general arrangement plan be reviewed and amended to clearly identify walking and cycling facilities on both the northern and southern sides to support the future growth and urbanisation of Drury East.
7.2	Kiwi Property No.2 Limited	Support	Traffic and transport effects	The submitter supports the purpose of NoR 2 to provide a multi-modal transport corridor and seeks clarification whether the cycleway will be provided on the southern side as well as the northern side of Great South Road as part of the South FTN upgrades.	Seeks that Schedule 1 of the proposed conditions be amended following review of the general arrangement plan to clearly illustrate walking and cycling facilities on both the northern and southern sides.
8.1	Carter Holt Harvey Property Limited	Oppose	Property and land use effects	The NoR affects the whole of 280 Great South Road, Drury and the general arrangement plan indicates the site will be used for construction purposes. The NoR would lock up the site for the foreseeable future creating planning blight and precluding development of the land for 10 years for possible use as a construction yard it not an efficient use of the land resource, which is zoned Business Mixed Use under the AUPOP.	Seeks that the extent of proposed designation be amended so it does not directly affect 280 Great South Road, Drury.

8.2	Carter Holt Harvey Property Limited	Oppose	Traffic and transport effects	With a bridge and fill batter across the full frontage of 280 Great South Road, Drury, it is not clear how vehicular access will be achieved, particularly with regard to access for heavy vehicles.	Seeks that safe and efficient vehicular access to 280 Great South Road, Drury, be maintained at all times for all turning movements.
9.1	KiwiRail Holdings Limited	Support	Support project	The submitter is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks and Active Mode Corridors and road/highway networks which facilitate mode transfer and enable future urban growth.	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.
9.2	KiwiRail Holdings Limited	Support	Other	Where KiwiRail is the Requiring Authority for the earlier designation, approval under s.177 RMA is required. The submitter expects that as part of the process all the necessary approvals will be sought in due course.	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.

9.3	KiwiRail Holdings Limited	Support	Traffic and transport effects	<p>The NoR abuts/overlaps slivers of the Drury Station designation. Design areas for further discussions are allowance for future capacity upgrades of rail system including access for construction, operation and maintenance; and integration of bus stops, cycleways at Great South Road near Drury Station to support mode transfer to the station. Ongoing dialogue about integration of RTN elements such as design width for cycleways, pedestrian facilities, safety and physical connections. Space proofing for the RTN needs to be considered.</p>	<p>Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.</p>
10.1	Auckland Council - Parks and Community Facilities	Oppose	Open space effects; Ecology effects	<p>The submitter is concerned about the effects of the NoR on 279 Great South Road, including the scale of effects on the vegetation, the stream, and its function as an esplanade reserve.</p>	<p>Seeks all effects on 279 Great South Road, Drury are avoided, so that its natural features are preserved and maintained.</p>

11.1	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Positive effects	The submitter supports the provision of providing transport choices and encouraging mode shift to sustainable transport modes as the population of South Auckland continues to grow through the South FTN. The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.	The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.
11.2	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Lapse period	A lapse date of 15 years is a significant period when impacting land owned by others. This lapse date should be reduced to a maximum of 5-10 years.	The lapse date should be reduced to a maximum of 5-10 years.
11.3	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	There is potential for existing schools, or any future schools developed in this area to be affected by traffic, noise and other nuisance effects from future construction work. The submitter seeks to ensure that appropriate conditions are included in the designations to mitigate any adverse effects with the construction of the South FTN.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.



11.4	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Other	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs. The submitter supports the terms used in the NoR: Educational facility; stakeholder.	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs.
11.5	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Traffic and transport effects	Condition 19 requires the preparation of a Construction Traffic Management Plan (CTMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.

11.6	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	Condition 22 and 23 requires the preparation of a Construction Noise Vibration Management Plan (CNVMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.	The submitter supports the inclusion of proposed conditions 22 and 23 Construction Noise Vibration Management Plan, but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.
11.7	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Urban design effects	The submitter supports the establishment of Stakeholder Communication and Engagement Management Plan (SCEMP) (condition 9). However, the submitter considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools.	Seeks amendments to conditions to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing. This includes the requirement that at least 6 months prior to construction, the requiring authority shall identify a list of stakeholders, properties, and identify methods to engage with stakeholders and submit this record with any Outline Plan of Works for the relevant stage of work.
12.1	Counties Energy Limited	Support	Positive effects	The submitter is generally supportive of the proposed road and facility upgrades indicated on the NoR 1 drawings.	The submitter is generally supportive of the proposed road and facility upgrades indicated on the NoR 2 drawings.

12.2	Counties Energy Limited	Support	Network Utility Operations	<p>It is important that plans for the upgrade of the road, and in particular the 'active mode facilities' accommodate existing network assets or provide their replacement and access for their maintenance and possible upgrade. Existing underground and ground mounted electricity infrastructure within NoR 2 drawings 4200 is medium voltage (22kV) lines and low voltage lines and pole locations.</p>	<p>The submitter requires further consultation and detailed planning concerning parts of NoR 2 to address matters which may impact the location and safe operation of the assets listed in the submission.</p>
12.3	Counties Energy Limited	Support	Network Utility Operations	<p>It is important that plans for the upgrade of the road, and in particular the 'active mode facilities' accommodate existing network assets or provide their replacement and access for their maintenance and possible upgrade. To maintain optimum operation and safety around equipment associated with underground electricity distribution, further consultation and detailed planning will be required where it is indicated to alter ground level in the vicinity of existing underground assets.</p>	<p>Further consultation and detailed planning will be required where it is proposed to alter the ground level in the vicinity of the submitter's underground assets.</p>
12.4	Counties Energy Limited	Support	Network Utility Operations	<p>Provision should be made in the proposed bridge shown in the NOR drawing 4200 for future extension of the underground electricity distribution network.</p>	<p>Provision should be made in the proposed bridge shown in the NOR drawing 4200 for future extension of the underground electricity distribution network.</p>

13.1	Watercare Services Limited	Neutral	Network Utility Operations	Some of the NoRs interact with the submitters existing water and wastewater assets. Some of the project areas for the NoRs are within areas where the submitter has planned for future infrastructure development.	The submitter seeks to ensure that any decisions made on the NoRs respond to the issues in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services now and in the future.
13.2	Watercare Services Limited	Neutral	Network Utility Operations	The submitter has no planned projects at this time that intersect with NoR 2, although its future needs may change. Ongoing engagement is critical to maintain alignment.	from the requiring authority for future planning and construction works including prior to detailed design and during implementation of construction works. For the submitter this includes applying for, in a timely manner, 'Works Over' Approvals, in compliance with the submitter's 'Water Supply and Wastewater Network Bylaw 2015
13.3	Watercare Services Limited	Neutral	Network Utility Operations	The NoRs interact with existing water and wastewater services.	do not impact its wastewater and water services in the NoR project areas now and into the future, that it has access 24/7 for maintenance, safety and efficient operation of its services and that it is consulted on any works that may impact the submitter's services.

13.4	Watercare Services Limited	Neutral	Network Utility Operations	<p>The submitter supports the intention of proposed conditions which seek to ensure that there is early engagement with relevant stakeholders during the development of the four NoRs (i.e. the conditions which require a Network Utility Management Plan, Stakeholders Communication and Engagement Management Plan and the Land Use Integration Process) but considers amendments are required so that the conditions adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.</p>	<p>requiring the preparation of a '<u>Network Utility Strategic Outcomes Plan</u>' (NUSOP): (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable. (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time. (c) The NUSOP shall: i. <u>consider expected asset life of existing assets</u>; ii. <u>consider expected asset capacity increases or changes</u>; and iii. <u>Demonstrate how city and national strategic plans are considered</u>. (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare. (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed. (f) Any comments</p>
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13.5	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks amendments to conditions so that they adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.	If the amendment sought in submission 13.4 is not included, the submitter seeks amendment to the NUMP condition: (a) A NUMP shall be prepared <u>after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction</u> <del>Start of Construction for a Stage of Work</del> ....(c) the NUMP shall be prepared in consultation....and shall include <u>any s.177 consents required for works affecting prior Designations and Watercare 'Works Over Approvals'</u> . (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify <u>opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The</u>
13.6	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks to ensure that the decisions made on the NoRs responds to the issues raised in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services.	The submitter seeks amendments to the conditions to ensure any adverse effects on its assets and operations are avoided, remedied or mitigated and to address concerns set out in the submission.
14.1	Kāinga Ora Homes and Communities	Support in part	Positive effects	The submitter supports the outcomes to be derived from the Project.	Supports the NoR in part subject to the relief sought and matters raised in the submission being addressed.

14.2	Kāinga Ora Homes and Communities	Support in part	Social impacts	The submitter generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.	Generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.
14.3	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Further information is required in relation to bus priority measures including dedicated bus lanes and priority at intersections.	general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through
14.4	Kāinga Ora Homes and Communities	Support in part	Lapse period	Further information is required in relation to reducing the lapse period from 15 to 10 years. The submitter seeks a lapse period of 10 years to encourage the project to be actioned with more urgency and in an integrated manner.	Amend Condition 5 Lapse from 15 years to 10 years to provide greater certainty and for the project to benefit communities sooner.
14.5	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Further information is required in relation to operational noise and vibration best practical option for PPFs identification and assessment; mitigation at source to within 55 dB $L_{Aeq(24h)}$ ; low noise road surface to be implemented on all roads within the designation and building modification for all PPFs to 40dB $L_{Aeq(24h)}$ inside buildings.	The operational noise levels for this project shall not exceed 55 dB $L_{Aeq(23h)}$ beyond the boundaries of the designation or, where exceeded at a sensitive receiver, mitigation is provided.

14.6	Kāinga Ora Homes and Communities	Support in part	Part 2 RMA	Amendments to the designation conditions and/or the design of the Project are sought to address the concerns of the submitter.	the submission the submitter considers that the NoR is contrary to sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 RMA; and will impact on the ability of people and communities to provide for their social, economic and cultural wellbeing.
14.7	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Integration with existing sections of bus lanes along the proposed FTN corridors should be demonstrated, including whether the designation has covered sufficient spatial extent to accommodate dedicated bus provision at approaches to major intersections.	The extent of the bus lanes are shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.
14.8	Kāinga Ora Homes and Communities	Support in part	Urban design effects	Condition 12 (Urban and Landscape Design Management Plan) should be amended to provide for buses and a more integrated, efficient and higher-capacity public transport network.	Landscape Design Management Plan to provide for buses and a more integrated, efficient and higher-capacity public transport network and amend 12(g): "The ULDMP(s) shall include: (iii)...(f) Integration of passenger transport <u>including the provision of dedicated bus lanes and demonstrating that direct bus services can occur</u>



14.9	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter's tenants often have complex needs and are highly sensitive to noise, vibration and disruption and operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants. WHO guidelines (cited in the submission) identify adverse health effects of road traffic.	A condition requiring operational noise levels to not exceed 55 dB $L_{aeq(24h)}$ beyond the boundaries of the designation or where exceeded at a sensitive receiver, mitigation is provided.
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Condition 25 (Low Noise Road Surface) is amended to require the use of low noise and vibration road surfaces for all road surfaces in the designation unless further information confirms this is not warranted from a health and safety perspective.
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Where mitigation is applicable to PPFs the offer for mitigation shall be extended as per its recommended conditions in Appendix A.

####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The proposed conditions freeze the receiving environment to what exists currently, ignores the future receiving environment.	revised to require a BPO assessment prior to construction in the future that recognises the receiving environment as it exists at the time.
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Conditions) as per Appendix A of the submission to address Best Practical Option (BPO) for PPFs identification and assessment; low noise road surface to be implemented on all roads within the designation; and building modification mitigation for all PPFs to 40 dB L <sub>Aeq(24h)</sub> inside buildings.
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Surface: (b) Any future resurfacing works of the Project shall be undertaken in accordance with the <u>BPO as determined in accordance with these conditions and</u> Auckland Transport Reseal Guidelines...and asphaltic concrete surfacing (or equivalent low road surface) shall be implemented where: <del>(i) The volume of traffic exceeds 10,000 vehicles per day; or (ii) The road</del>
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 31 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (time of lodging the OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>

####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 32 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 33: <del>...adopting the Best Practicable Option in accordance with NZS 6806 prior to implementation.</del> <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Mitigation Options shall be implemented...within twelve months of completion of construction, <u>subject to confirmation that during this 12 month period road traffic noise will remain compliant with the noise categories adopted for the NoRs and subject to confirmation that this approach is therefore the BPO, and that there are no other viable options that would</u>

####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	<p>of Construction, a Suitably Qualified Person shall identify those dwellings which, following implementation of all the Detailed Mitigation Options, <del>will not be Noise Criteria Categories A or B and where would still require</del> Building-Modification Mitigation <del>might be required</del> to achieve 40 dB L<sub>Aeq(24h)</sub> inside Habitable Spaces ('<del>Category C Buildings</del>'). For those PPFs, following the process set out in Conditions 36 to 41, it shall be determined which <u>Building Modification Mitigation is required to achieve 40 dB LAeq(24h) inside habitable spaces. A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 2 PPFs and their classifications, to include future planned PPFs. Any future residential or other PPFs provided for in the AUP:OP</u></p>
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####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration (operational)	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>of Construction in the vicinity of each <del>Category C Building requiring building-modification mitigation</del>, the Requiring Authority shall write to the owner of the <del>Category C Building</del>. If the building owner agrees to entry within <del>six three-months...building envelope</del>. If after 6 months following the date of the <del>requiring authority's letter, no response has been received</del>, the Requiring Authority shall again write to the owner of the Building requesting entry to assess the noise reduction performance of the existing building envelope. If the <del>building owner agrees to entry within six months of the date of the Requiring Authority's letter</del>, the Requiring Authority shall instruct a <u>Suitably Qualified and Experienced Person to visit the building and assess the noise reduction performance of the existing building envelope</u>. A new BPO assessment shall be undertaken to <u>determine the BPO for the environment</u></p>
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####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration (operational)	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	€ Building <u>requiring Building-Modification Mitigation</u> identified, the Requiring Authority is deemed to have complied with Condition 36 above if...(c ) The building owner did not agree to entry within <del>six</del> <u>three</u> months of the date of the Requiring Authority's <u>last</u> letter.... If any of (b) to (d) above apply to a <u>Category C</u> Building, the Requiring Authority is not required to implement Building-Modification Mitigation to that
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration (operational)	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Condition 37 above,....write to the owner of each <u>Category C</u> Building <u>requiring Building-Modification Mitigation</u> advising:...(b) The options available, <u>at the cost of the Requiring Authority</u> , for Building-Modification Mitigation...(c ) That the owner has <u>24</u> <del>three</del> <u>months from completion of construction of the relevant section of the project</u> to decide whether to accept...more than one option is
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 39: Once an agreement on Building-Modification Mitigation is reached between the Requiring Authority and the owner of a <u>Category C</u> Building <u>requiring Building-Modification Mitigation</u> , the mitigation shall be implemented <u>at the Requiring Authority's expense</u> ,....

####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	owner did not accept the Requiring Authority's offer to implement Building-Modification Mitigation <u>within 24 months of completion of construction of the relevant section of the Project;</u> <del>three months of the date of the Requiring Authority's letter sent in accordance with Condition 37 (including where the owner did not respond within that period);</del> or (d) The building owner cannot, after reasonable enquiry, be found <u>within 24 months of the prior</u>
####	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend Condition 41: The Detailed Mitigation Options shall be maintained <u>by the Requiring Authority</u> so they retain their noise reduction performance as far as practicable.
15.1	Drury Tires / Drury Hills Trust	Oppose	Property and land use effects	The submitter owns 257 Great South Road, Drury and rents 1 Firth Street to operate their business. The submitter is concerned with the proposed acquisition of their land for the construction of the new bridge.	Seeks that the construction contractors establish their base at the currently vacant site at 280 Great South Road, Drury to ensure minimal disruption to businesses.

15.2	Drury Tires / Drury Hills Trust	Oppose	Traffic and transport effects	The tenants of the submitter at 257 Great South Road, are concerned about business disruption and to mitigate this, the majority of the roadworks should take place on the right-hand side where the existing bridge is situated.	Seeks that impacts on 257 Great South Road, Drury are mitigated by locating the majority of the roadworks on the right-hand side where the existing bridge is situated.
16.1	Firth Street Ltd	Oppose	Property and land use effects	The submitter owns land on both sides of Firth Street near the intersection with Great South Road and is concerned about the impacts on their tenant, Drury Auto Tyres. Agrees with the submission made by Drury Auto Tyres and agrees there is a need to reduce the area designated for use during construction, as this can be located on the other side of the road where there is vacant land.	Seeks that the construction contractors establish their base at the currently vacant site at 280 Great South Road, Drury to ensure minimal disruption to businesses.
16.2	Firth Street Ltd	Oppose	Traffic and transport effects	Agrees with the submission by Drury Tyres regarding their tenants at 257 Great South Road, who are concerned about business disruption and to mitigate this, the majority of the roadworks should take place on the right-hand side where the existing bridge is situated.	Seeks that impacts on 257 Great South Road, Drury are mitigated by locating the majority of the roadworks on the right-hand side where the existing bridge is situated.



Notice of Requirement - NoR 3: South Frequent Transit Network: Takaanini FTN – Weymouth,					
Summary of Submissions					
Sub #	Submitter Name	Oppose/Su	Topic	Summary of Key Issues	Relief Sought
1.1	Rajnesh Jai Singh	Oppose	Noise and vibration effects	Existing widening has added noise pollution, house shakes when trucks go past the man hole, the road seal was left uneven and dust comes in house because of excessive traffic.	Don't need any extra line and don't want to lose land.
1.2	Rajnesh Jai Singh	Oppose	Traffic and transport effects	Will lose residential car park space and existing road is dangerously close.	Don't need any extra line and don't want to lose land.
2.1	Super Liquour Manurewa	Oppose	Social Impacts	Does not want business and property affected.	Stop the process.
3.1	Christopher Digby and Patricia Margaret Ward	Oppose	Property and land use effects	Oppose the NoR affected 177 sqm of 16 Alfriston Road. The road boundary of the property is retained by a block wall (refer photo attached to submission) and this means there is no requirement for a cut batter to be applied. The submitter's understanding from Auckland Transport planners is that if the existing retaining wall is demolished or damaged it will be replaced by AT when the works are completed with no change to the boundary profile.	Removal of NoR on 16 Alfriston Road.
4.1	Kamal Vasudev Matta	Neutral	Property and land use effects	The submitter is not sure how their property, its characteristics, dwellers, and value will be adversely affected.	Seeks more clarification and explanation with tentative timeline of the process from start to completion.

5.1	Mohammed David Thalari	Oppose	Property and land use effects; Social impacts	Submitter's family have lived at 141 Alfriston Road since 2004 and the proposal is robbing the submitter's peace. The proposal is causing stress to mental health and daily lives.	Does not want money, wants peace and home as is.
6.1	Mayvan Holdings Ltd	Oppose	Traffic and transport effects; Social Impacts	The tenants of 203 Great South Road, Manurewa object to loss of parking for customers and loading/unloading of goods and services to tenant's businesses operating as takeaway cafes. The inflow of customers will reduce and affect revenue, and the receipt of goods for cafe operation will be hindered.	Seeks that the current street parking spaces be maintained to mitigate loss of parking for customers and loading/unloading of goods.
7.1	Wassil Chiba	Oppose	Bus lanes	There are already bus lines and save the cost to somewhere else.	Remove the strip lan in the middle and that will do the job.
8.1	ChanLong Lim	Oppose	Property and land use effects	The road now is enough to use.	Submitter does not want their land to be cut.
9.1	Prem Chand and Savita Chand	Oppose	Traffic and transport effects; Social Impacts	Submitter concerned with parking problem and safety of their property at 135 Alfriston Road being too close to the road. Also concerned with traffic jams and effects on property including existing fencing and gates for dog.	Submitter opposes the NoR.
10.1	Awdisho Khamis and 30 Signatories	Oppose	Noise and vibration effects	Submitter's property at 88 Magic Way will be affected by vibration, noise and dust from demolition of 141a Alfriston Road.	Stop this project.

10.2	Awdisho Khamis and 30 Signatories	Oppose	Traffic and transport effects	There is already a cycling path and bus stop on Alfriston Road and this project is a waste of time, money and disturbing residents.	Stop this project.
10.3	Awdisho Khamis and 30 Signatories	Oppose	Social impacts	The project will affect and take our lands and properties that we had worked so hard to own and we have been living in for years. This will affect our whanau physically, mentally and financially.	Stop this project.
10.4	Awdisho Khamis and 30 Signatories	Oppose	Traffic and transport effects	This project will affect the traffic flow in and out of the area, full road closure.	Stop this project.
10.5	Awdisho Khamis and 30 Signatories	Oppose	Noise and vibration effects	This project will affect noise level.	Stop this project.
11.1	George Khamis	Oppose	Noise and vibration effects	Submitter's property at 88 Magic Way will be affected by vibration, noise and dust from demolition of 141a Alfriston Road.	Stop this project.
11.2	George Khamis	Oppose	Traffic and transport effects	There is already a cycling path and bus stop on Alfriston Road and this project is a waste of time, money and disturbing residents.	Stop this project.
12.1	Werner Andreas van Schalkwyk	Neutral	Property and land use effects	Supports the NoR only if the whole land and house are purchased at good market value to enable the submitter to relocate to a new home of equal or better value. Cutting off part of the house will not be acceptable. Partial sale will lower the property value and submitter will be forced to sell at a loss.	Will not accept a partial sale of land and house.

13.1	George Khamis and 30 Signatories	Oppose	Social impacts	Submitter's property at 141a Alfriston Road will be demolished and this is affecting the submitter and family physically and mentally. Submitter does not want to lose their property.	Submitter is against this project.
13.2	George Khamis and 30 Signatories	Oppose	Noise and vibration effects	This project will affect the environment - noise level, dust and shaking the foundation of other properties.	Submitter is against this project.
13.3	George Khamis and 30 Signatories	Oppose	Social impacts	The project will affect and take our lands and properties that we had worked so hard to own and we have been living in for years. This will affect our whanau physically, mentally and financially.	Submitter is against this project.
13.4	George Khamis and 30 Signatories	Oppose	Traffic and transport effects	This project will affect the traffic flow in and out of the area, full road closure.	Submitter is against this project.
13.5	George Khamis and 30 Signatories	Oppose	Noise and vibration effects	This project will affect noise level.	Submitter is against this project.
14.1	Telecommunication Submitters	Oppose	Network Utility Operations	The Network Utility Management Plan condition is not the same as has been agreed with the Airport to Botany and Northwest Transport Projects. The updated clause d inclusion of the wording "during detailed design" has not been included. Key to the outcomes the submitters seek is to ensure they are adequately consulted over effects on their existing infrastructure as well as being provided the opportunity to discuss any future requirements so	Amend the Network Utility Management Plan condition clause d to read: "(d) the development of the NUMP shall consider opportunities to coordinate future work programmes with out network utility operator(s) <u>during the further project stages including detailed design</u> where practicable."

14.2	Telecommunication Submitters	Oppose	Network Utility Operations	The 'design stage' is not an actual stage but is instead progressive and for clause d in the NUMP condition to be more effective it should be amended. It is reasonable for there to be provisions to ensure telecommunication works/opportunities are properly considered during the design phase through consultation with network utility operators. The AEE does not list all affected utility operators.	The outcomes the submitter seeks is to ensure they are adequately consulted by the requiring authority over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.
14.3	Telecommunication Submitters	Oppose	Property and land use effects	Spark owns and manages an existing Tier 3 data centre facility on 23 Popes Road affected by NoR 3. Spark would prefer there was no impact on the site and oppose any further encroachment of the designation onto its site.	Spark seek confirmation from Auckland Transport that the ownership of designated land remains with Spark and not subject to land acquisition given the proposed works are only temporary during road construction.
14.4	Telecommunication Submitters	Oppose	Property and land use effects	Spark owns and manages an existing Tier 3 data centre facility on 23 Popes Road affected by NoR 3. Spark would prefer there was no impact on the site	Minimise the extent of designation footprint at 23 Popes Road and do not increase the designation footprint.
14.5	Telecommunication Submitters	Oppose	Network Utility Operations	Condition 2 Project Information will ensure the requiring authority will contact Spark directly as an	Retain Conditions 2 Project Information; Condition 3 Land Integration Process;
15.1	McDonald's Restaurants NZ Limited	Oppose	Property and land use effects	The submitter owns and operates a restaurant at 207 Great South Road, Manurewa that is affected by the planned intersection upgrade for Great South Road / Weymouth Road /Alfriston Road and that will have to be closed and be demolished.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.

15.2	McDonald's Restaurants NZ Limited	Oppose	Part 2 RMA	The NoR would not promote sustainable management of physical resources, promote efficient use and development of physical resources, ensure consistency with good resource management practise or adequately manage adverse effects on the environment.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
15.3	McDonald's Restaurants NZ Limited	Oppose	Property and land use effects	Schedule B of Form 18 for NoR 3 records that 593m <sup>2</sup> of 207 Great South Road Manurewa will be designated to construct a flush median, cycleway, pedestrian footpath and berm. The remainder of the designation boundary encompasses the majority of the site and it is not clear what activities are intended to take place within this area.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
15.4	McDonald's Restaurants NZ Limited	Oppose	Traffic and transport effects	The objectives sought, including upgrading the intersection and bus priority measures, could be achieved in a smaller designation footprint.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.

15.5	McDonald's Restaurants NZ Limited	Oppose	Property and land use effects	The importance of roading infrastructure to accommodate future growth is acknowledged but upgrades should enable successful businesses to continue operating where possible.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
15.6	McDonald's Restaurants NZ Limited	Oppose	Property and land use effects	Due to the commercial and residential density of the immediate area finding a comparable site is unlikely and the cost of re-establishing would be cost-prohibitive.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
15.7	McDonald's Restaurants NZ Limited	Oppose	Social Impacts	The community impact will be significant, with closure of the restaurant resulting in loss of 101 jobs.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.

15.8	McDonald's Restaurants NZ Limited	Oppose	Property and land use effects	The submitter has a ground lease with South Mall Body Corporate for provision of gas, right of way, parking and maneuvering which will be affected by the project.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
15.9	McDonald's Restaurants NZ Limited	Oppose	Alternative routes, sites, methods	The intersection is already signalled and the assessment of alternatives in Table 4-4 AEE does not consider the position of the existing restaurant. The submitter considers the restaurant should have been considered in the refinement of the boundary of the designation.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
15.10	McDonald's Restaurants NZ Limited	Oppose	Lapse period; Social impacts	There is uncertainty surrounding the timeframe for construction of the project. The uncertainty created by having land subject to a NoR for an indeterminate period of time and for an uncertain purpose is not in accordance with good resource management practise.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.



15.11	McDonald's Restaurants NZ Limited	Oppose	Property and land use effects	It is unclear whether the designation boundary outside of the proposed works area is to be used for construction only or is to be retained in the final designation.	Seeks that the NoR be withdrawn to the extent that it applies to 207 Great South Road, Manurewa or alternatively modify NoR 3 to give effect to the concerns raised in the submission.
16.1	Manurewa Business Association Incorporated	Support	Positive effects	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.
16.2	Manurewa Business Association Incorporated	Oppose	Submission period	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.
16.3	Manurewa Business Association Incorporated	Oppose	Urban Design effects	Supports the intent to demonstrate appropriate integration of the Manurewa Town Centre with active mode pathways.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

16.4	Manurewa Business Association Incorporated	Oppose	Social impacts	Is concerned about business interruption due to construction works, temporary and permanent designations.	Requests that unit owners and local businesses who are impacted are supported to relocate and fair value is compensated for losses.
16.5	Manurewa Business Association Incorporated	Oppose	Urban Design effects	Notes that blocking and bypassing the southern entrance and exit of Southmall is contradictory to the Town Centre integration intended by the FTN.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
16.6	Manurewa Business Association Incorporated	Oppose	Traffic and transport effects	Notes the ambiguity regarding proposed changes to the Weymouth Road overbridge - whether it will be widened or the existing bridge will have new configurations on the road.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
16.7	Manurewa Business Association Incorporated	Oppose	Engineering	Notes a lack of clarity around existing utilities including drainage being upgraded.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

16.8	Manurewa Business Association Incorporated	Oppose	Traffic and transport effects	Notes a lack of consideration has been given to existing ground leases, carparks, easements and connections that enable the accessibility of all modes of transport traffic to businesses.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
17.1	Southmall Manurewa	Support	Positive effects	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.	Supports the need for improved transport mode connections and services and can see the merit in the vision for the South FTN.
17.2	Southmall Manurewa	Oppose	Submission period	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.	Notes the time given to provide detailed feedback in extremely limited given the magnitude of the proposed NoRs.
17.3	Southmall Manurewa	Oppose	Urban Design effects	Supports the intent to demonstrate appropriate integration of the Manurewa Town Centre with active mode pathways.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

17.4	Southmall Manurewa	Oppose	Social Impacts	Is concerned about business interruption due to construction works, temporary and permanent designations.	Requests that unit owners and local businesses who are impacted are supported to relocate and fair value is compensated for losses.
17.5	Southmall Manurewa	Oppose	Urban Design effects	Notes that blocking and bypassing the southern entrance and exit of Southmall is contradictory to the Town Centre integration intended by the FTN.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

17.6	Southmall Manurewa	Oppose	Traffic and transport effects	Notes the ambiguity regarding proposed changes to the Weymouth Road overbridge - whether it will be widened or the existing bridge will have new configurations on the road.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
17.7	Southmall Manurewa	Oppose	Engineering	Notes a lack of clarity around existing utilities including drainage being upgraded.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
17.8	Southmall Manurewa	Oppose	Traffic and transport effects	Notes a lack of consideration has been given to existing ground leases, carparks, easements and connections that enable the accessibility of all modes of transport traffic to businesses.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.

17.9	Southmall Manurewa	Oppose	Traffic and transport effects	Will be negatively impacted by the loss of carparks.	Seeks better connectivity to the Manurewa Town Centre and Southmall and oppose any routes that bypass or block access. Better integration is required to the Manurewa Town Centre and Southmall for connectivity, accessibility, safety and attractiveness of the area.
17.10	Southmall Manurewa	Oppose	Urban Design effects	The submitter can guide future development opportunities to have a greater beneficial outcomes for Southmall, the Manurewa Town Centre, the FTN and the community and suggests an alternative solution for a transit oriented development that would meet the intent of the FTN to integrate with the Manurewa Town Centre and further enhance accessibility, connectivity and multiple modes of	Seeks a public private partnership to develop a mixed use multilevel building on the corner of the Southern end of the Southmall carpark and Weymouth Road.
18.1	Pravin Umaria and Praveena Umaria	Oppose	Noise and vibration effects	Submission relates to 106 Alfriston Road. It will be very noisy with added lanes of traffic. Already it is busy and noisy with sleep disturbance.	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers money elsewhere where it is more urgently required than on Alfriston Road.
18.2	Pravin Umaria and Praveena Umaria	Oppose	Traffic and transport effects	Kindergarten and school safety issues with more traffic flow, will have speeding issues and accidents.	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers money elsewhere where it is more urgently required than on Alfriston Road.

18.3	Pravin Umaria and Praveena Umaria	Oppose	Property and land use effects	Compensation of land and properties will not be very competitive to market value. Current fencing, underground cabling, water internet services will be affected and will it be restored and compensation paid of downtime and possible delays.	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers money elsewhere where it is more urgently required than on Alfriston Road.
18.4	Pravin Umaria and Praveena Umaria	Oppose	Traffic and transport effects	Local resident and traffic flow delays during construction.	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers money elsewhere where it is more urgently required than on Alfriston Road.
18.5	Pravin Umaria and Praveena Umaria	Oppose	Social impacts	Drunkards and people throwing rubbish into properties and damaging windows and properties is already an issue now.	Leave the way it is or try some other alternatives instead of affecting land and properties. Spend ratepayers money elsewhere where it is more urgently required than on Alfriston Road.
19.1	Harpatap Singh Kalra and Anjana Kalra	Oppose	Property and land use effects	There is uncertainty of the submitter's ability to use their land at 139 Alfriston Road for an intended 4 house development once the NoR is approved. Uncertainties about use of the site and ability to access and egress the site are distressing for submitter and family.	The NoR should be withdrawn as the Council is currently scrapping its cycleway projects.

19.2	Hartap Singh Kalra and Anjana Kalra	Oppose	Traffic and transport effects	Submitter does not know how the roadworks, upgrades in speed etc will affect ability to access and egress the site at 139 Alfriston Road.	The NoR should be withdrawn as the Council is currently scrapping its cycleway projects.
19.3	Hartap Singh Kalra and Anjana Kalra	Oppose	Traffic and transport effects	It makes no sense to continue with the NoR for land for a cycleway when the council has or is about to scrap the cycleway. The land is no longer 'required' so there is no longer a foundation for the NoR.	The NoR should be withdrawn as the Council is currently scrapping its cycleway projects.
19.4	Hartap Singh Kalra and Anjana Kalra	Oppose	Property and land use effects; Social impacts	The NoR would reduce the ability of a large number of property owners to build a significant number of new dwellings for no reason. In the submitter's case the NoR may result in 2 fewer houses being built at 139 Alfriston Road.	The NoR should be withdrawn as the Council is currently scrapping its cycleway projects.
20.1	Wai Ming CHAN	Neutral	Property and land use effects	Submitter is concerned the tenant of their rental property at 2/51 Alfriston Road may move out due to disturbance and the submitter will have financial losses and the value of the property will be affected.	Submitter will support the NoR if their concerns are taken care of by the authority.
21.1	Mahendran Rama	Oppose	Property and land use effects	The power source for the submitter's rental property at 1 Beaumonts Way is directly affected by this plan.	Seeks a change in the plan that would exclude the power source for the submitter's property at 1 Beaumonts Way being affected.



22.1	Nitinkumar Patel	Oppose	Property and land use effects	Submitter is concerned that all form of parking at their property at 137 Alfriston Road will be removed. The plans show half of the carport will be removed.	Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.
22.2	Nitinkumar Patel	Oppose	Traffic and transport effects	Road works in 2021 to create 2 lanes at the intersection of Alfriston Road and Magic Way already increased traffic and dangerous driving and the road is already busy. More traffic congestion is not safe for school children.	Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.

22.3	Nitinkumar Patel	Oppose	Traffic and transport effects	<p>The main focus should be to improve public transport services. Two bus lanes on each side of the road - how do we get in and out of our property during peak hours.</p>	<p>Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.</p>
22.4	Nitinkumar Patel	Oppose	Property and land use effects	<p>The entire front area of the property at 137 Alfriston Road will be taken, meaning the footpath will be directly next to the front window. People may vandalise the property and privacy will be lost. Gates, fencing, water meter, internet connection are in the front yard and will be affected.</p>	<p>Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.</p>

22.5	Nitinkumar Patel	Oppose	Social impacts	Will we be compensated for time/days taken off work to attend Court.	Move focus elsewhere where it is directly needed. Carry out a survey of the people who use and live on roads that have more people using them, including Puhinui Road, Papatoetoe; Browns Road, Manurewa; and Great South Road, Papakura, to find just how much work is needed in these areas compared to Alfriston Road.
23.1	Mahendra Kumar	Oppose	Property and land use effects	Opposed to proposed boundary changes at 67 Alfriston Road, which will have significant adverse effects on our livelihood from growing fruit and vegetables and storage for self-employed business.	Prior to improving the infrastructure on Alfriston Road, consider the existing infrastructure. There is no point in improving the road infrastructure when the bridge acts as a bottleneck from both sides.

23.2	Mahendra Kumar	Oppose	Traffic and transport effects	Opposed to the proposed boundary changes at 67 Alfriston Road, which will have significant adverse effects on our livelihood with the front area used for parking 10 work vehicles.	Prior to improving the infrastructure on Alfriston Road, consider the existing infrastructure. There is no point in improving the road infrastructure when the bridge acts as a bottleneck from both sides.
23.3	Mahendra Kumar	Oppose	Social impacts	Opposed to the proposed boundary changes at 67 Alfriston Road, which will have significant adverse effects on security and safety. Bringing the fence closer to the front door increases the risk of criminal activities and accidents.	Prior to improving the infrastructure on Alfriston Road, consider the existing infrastructure. There is no point in improving the road infrastructure when the bridge acts as a bottleneck from both sides.
23.4	Mahendra Kumar	Oppose	Alternative routes, sites and methods	We urge you to reconsider and to explore alternative solutions, as the proposed changes will have a disproportionately negative impact on the submitter and their family.	We urge you to reconsider and to explore alternative solutions, as the proposed changes will have a disproportionately negative impact on the submitter and their family.

24.1	Orient Pacific Trust Ltd	Oppose	Property and land use effects	Submitter will experience a great loss by devaluation of the property at 34 Alfriston Road.	Seeks full compensation according to independent valuations at the time.
25.1	Accessible Properties Limited	Oppose	Property and land use effects	The proposed designation boundary and associated work will have a significant negative impact on 59-59C Alfriston Road, which has 4 tenancies and which were built to accommodate tenants with physical and intellectual disabilities. The submitter opposes a designation that does not reinstate the land to ensure suitable access to the front of tenancy 59C Alfriston Road.	Alter the proposed designation boundary so it sits outside the boundary of 59-59C Alfriston Road and does not impact ongoing activities of the tenancies.
25.2	Accessible Properties Limited	Oppose	Property and land use effects	Sufficient design detail is required to understand whether the proposed works will alter 59-59C to the extent that it impacts the ability to use the properties for their intended purpose. Insufficient detail is provided on the proposed fill batter or gradient and inconsistent information has been provided. Retaining wall is proposed within the Urban Design Evaluation, Appendix A (Part 5), Sheet 13: Alfriston, which would render the property frontage inaccessible to pedestrians.	If the proposed designation boundary is not altered, relief sought includes for Condition 1: Project Description and Concept Plans are to provide clarity on the proposed works, so that the potential effects can be understood, particularly on 59C Alfriston Road.

25.3	Accessible Properties Limited	Oppose	Traffic and transport effects	The proposed designation boundary and associated work will have a significant negative impact on 59-59C Alfriston Road, which has 4 tenancies and which were built to accommodate tenants with physical and intellectual disabilities. The submitter opposes a designation that does not reinstate the land to ensure suitable access to the front of tenancy 59C Alfriston Road.	If the proposed designation boundary is not altered, relief sought includes for Condition 19: Construction Traffic Management Plan shall specify that access to the property is always retained, including for emergency services to all tenancies at 59-59C Alfriston Road.
25.4	Accessible Properties Limited	Oppose	Noise and vibration effects	59B Alfriston Road is identified as a receiver who will receive noise levels greater than 70 dB $L_{Aeq(15mins)}$ during construction and it is important that advance notice is provided if works are to extend beyond standard working hours. 59C has not been assessed but there is inconsistent information whether this building will be removed during construction.	If the proposed designation boundary is not altered, relief sought includes for Condition 20: Table 20.1 Construction Noise Standards is amended to require that construction noise at 59-59C Alfriston Road to be reduced to 45dB $L_{Aeq(15mins)}$ and 75dB $L_{AFmax}$ between 6pm and 8am 7 days a week. This ensures that construction noise does not cause sleep disturbance to sensitive tenants.
25.5	Accessible Properties Limited	Oppose	Noise and vibration effects	The submitter is concerned that 59-59C will suffer damage during construction. 59C has not been assessed as it is assumed it will be removed during construction but conflicting information has been given that 59C will be retained.	If the proposed designation boundary is not altered, relief sought includes for Condition 21: Table 21.1 Construction Vibration Criteria is amended to require all vibration on 59-59C Alfriston Road to be reduced to 0.3mm/s ppv between 6pm and 8am 7 days a week. This ensures construction noise does not cause sleep disturbance to sensitive tenants.

25.6	Accessible Properties Limited	Oppose	Noise and vibration effects	Given the sensitivity of the existing tenants of 59-59C Alfriston Road, it is important that advance notice of works is provided if works are to extend beyond standard working hours.	If the proposed designation boundary is not altered, relief sought includes for Condition 23: is amended to require that a Schedule is prepared in consultation with owners and occupiers of the sites where construction noise is predicted to exceed the amended noise levels sought in the submitter's submissions on conditions 20 & 21. The Schedule shall be provided to the Manager at least one month in advance of Construction Works to ensure that the submitter has sufficient time to manage potential noise disturbance. If noise levels are proposed to be heightened for extended periods during construction then relocation of tenants may be required.
25.7	Accessible Properties Limited	Oppose	Noise and vibration effects	The proposed designation boundary and associated work will have a significant negative impact on 59-59C Alfriston Road, which has 4 tenancies and which were built to accommodate tenants with physical and intellectual disabilities. The submitter opposes a designation that does not reinstate the land to ensure suitable access to the front of tenancy 59C Alfriston Road.	If the proposed designation boundary is not altered, relief sought includes for Conditions 30-41: Once clarity is obtained on the treatment and categorisation of the tenancy at 59C, the submitter will review the conditions concerning Building-Modification Mitigation to ensure they are fit for purpose.

25.8	Accessible Properties Limited	Oppose	Noise and vibration effects	59-59B have been identified as Protected Premises and Facilities, however 59C has not been assessed. There is conflicting information whether 59C will be removed during construction. Given that 59C has not been assessed, it is unclear whether the assessment would have identified this as a Category B or Category C building.	The omission of assessment of noise and vibration effects on 59C Alfriston Road creates uncertainty about the potential effects. The requiring authority should be transparent with the submitter on the feasibility of retaining the property for residential use.
26.1	The National Trading Company of New Zealand	Oppose	Car parks	The submitter is concerned that the designation encroaches 36m into and covers 1978m <sup>2</sup> of 185 Great South Road, Manurewa comprising the New World Southmall complex, which would remove 47 carparks. The Assessment of Transport Effects does not assess the effects of removing these carparks.	The NoR be accepted provided the designation is amended to avoid the need for any land take from 185 Great South Road, Manurewa comprising the New World Southmall complex, or in the event that a land take cannot be avoided that this is minimised to the greatest extent possible.
26.2	The National Trading Company of New Zealand		Car parks	The 47 carparks in the area covered by the designation on 185 Great South Road, Manurewa are well-utilised and the loss of carparks to the project and/or construction will have a significant adverse effects on the operation of the New World Southmall complex.	The submitter seeks replacement carparking spaces be provided by the requiring authority to offset those lost to the designation.



26.3	The National Trading Company of New Zealand	Oppose	Traffic and transport effects	The General Arrangement Plan appears to indicate that the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex will be closed and may not be reinstated. This would have adverse effects on traffic circulation within the site and congestion of other access points to the site.	The NoR be accepted provided that the designation is amended and conditions imposed to ensure that Weymouth Road access to 185 Great South Road, Manurewa comprising the New World Southmall complex, providing full turning capacity, is clearly identified as being reinstated and retained in its current form.
26.4	The National Trading Company of New Zealand	Oppose	Traffic and transport effects	The upgrade of Weymouth road to a four-lane arterial will result in the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex no longer complying with the minimum acceptable visibility for uncontrolled intersections. Proposed condition 15 does not address these concerns.	The NoR be accepted provided that conditions are imposed to ensure that there will be no long-term (i.e. post construction) effects on any of the existing vehicle access to and egress from 185 Great South Road, Manurewa comprising the New World Southmall complex, and that these will be retained largely in their current form following completion of construction.
26.5	The National Trading Company of New Zealand		Traffic and transport effects	arterial will result in the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex no longer complying	Access to 185 Great South Road, Manurewa comprising the New World Southmall complex be clearly identified in the General
26.6	The National Trading Company of New Zealand		Traffic and transport effects	The upgrade of Weymouth road to a four-lane arterial will result in the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex no longer complying with the minimum acceptable visibility for uncontrolled intersections. Proposed condition 15 does not address these concerns.	The submitter seeks that the Requiring Authority install signals at the Weymouth Road Access to 185 Great South Road, Manurewa comprising the New World Southmall complex.

26.7	The National Trading Company of New Zealand	Oppose	Traffic and transport effects	The submitter is concerned that the construction phase may result in significant adverse effects on the operation of the site at 185 Great South Road, Manurewa comprising the New World Southmall complex. The submitter seeks that a site-specific construction traffic management plan be required prior to works being undertaken in the vicinity of the site to demonstrate how construction traffic effects will be appropriately managed.	That the NoR be accepted provided that conditions are imposed to ensure that adverse effects on access to and egress from 185 Great South Road, Manurewa comprising the New World Southmall complex, are minimised as far as practicable during construction.
26.8	The National Trading Company of New Zealand	Oppose	Traffic and transport effects	The submitter is concerned that the construction phase may result in significant adverse effects on the operation of the site at 185 Great South Road, Manurewa comprising the New World Southmall complex. The submitter seeks that a site-specific construction traffic management plan be required prior to works being undertaken in the vicinity of the site to demonstrate how construction traffic effects will be appropriately managed.	That the NoR be accepted provided that conditions are imposed to ensure that prior to the commencement of construction in the vicinity of 185 Great South Road, Manurewa comprising the New World Southmall complex, a construction traffic management plan apply to the road network in the immediate vicinity of the site is prepared by the requiring authority in consultation with the submitter, provided to Council along with details of the submitter's observations and comments on the plan; and approved by the Council.
26.9	The National Trading Company of New Zealand	Oppose	Part 2 RMA	Unless relief sought in the submission is granted, the NoR will be inconsistent with Part 2 RMA, generate significant adverse effects on the environment and in particular on 185 Great South Road, Manurewa comprising the New World Southmall complex, and not warrant being confirmed under s.171 RMA.	That the NoR be accepted provided that such other conditions, relief or other consequential amendments as are considered appropriate or necessary to address matters outlined in the submission. If the relief sought in the submission is not accepted the NoR be declined.

27.1	Restaurant Brands Limited	Oppose	Part 2 RMA	Submitter opposes the NoR in its current form because it would not promote sustainable management or the efficient use and development of physical resources and would not ensure consistency with good resource management practice.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the
27.2	Restaurant Brands Limited	Oppose	Alternative routes, sites, methods	Had an adequate assessment of alternatives under s.171(1)(b) RMA being undertaken that would either not require or reduce the extent of land to be acquired from the submitter's property at 2 Weymouth Road, Manurewa.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.
27.3	Restaurant Brands Limited	Oppose	Property and land use effects	The extent of the designation combined with the scale and duration of the construction works in the vicinity of the KFC drive-through restaurant at 2 Weymouth Road, Manurewa will have unacceptable negative effects on the restaurant operation.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.
27.4	Restaurant Brands Limited	Oppose	Traffic and transport effects	The negative effects of the designation include the general arrangement plans not illustrating the retention of the existing vehicular access arrangements to 2 Weymouth Road, Manurewa.	confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The

27.5	Restaurant Brands Limited	Oppose	Traffic and transport effects	The negative effects of the designation include the general arrangement plans illustrate construction of a batter over part of the drive-through and the removal of a significant amount of customer parking and on-site maneuvering without any mitigation and will prevent the ongoing operation of the restaurant.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.
27.6	Restaurant Brands Limited	Oppose	Property and land use effects	The negative effects of the designation include no provision is made for replacement of the submitter's freestanding identification and entry/exit signs.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.

27.7	Restaurant Brands Limited	Oppose	Noise and vibration effects	The negative effects of the designation include the construction works will occur within the property and has potential to generate unacceptable noise, vibration and dust effects on the drive-through and customer dining areas.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.
27.8	Restaurant Brands Limited	Oppose	Traffic and transport effects	The negative effects of the designation include effects the effect on the restaurant operations of changes to the layout and operation of the surrounding road network, including during construction.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.

27.9	Restaurant Brands Limited	Oppose	Noise and vibration effects	The proximity of the works to the drive-through restaurant activity is such that that the NoR has the potential to result in significant construction noise and vibration effects on 2 Weymouth Road. The drive-through restaurant may not be able to operate without constraining the timing and duration of the construction activities through the conditions of consent.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.
27.10	Restaurant Brands Limited	Oppose	Lapse period	The entire site is proposed to be designated for the works. The effect of the designation with a 15 year lapse period is it effectively prevents the submitter from developing the land until the works are constructed. There is no guarantee that s.176 approval from the requiring authority would be forthcoming.	The submitter opposes the NoR being confirmed in its current form and seeks the requirement not be confirmed, at least to the extent they authorise works on the submitter's site at 2 Weymouth Road, Manurewa. The submitter seeks such related and consequential relief as may be necessary to give effect to the concerns set out in the submission.
28.1	Fire and Emergency New Zealand	Oppose	Property and land use effects	The submitter is concerned that the removal of any part of the front concrete apron at the Manurewa Fire Station at 255 Great South Road, Manurewa, may delay or impede response to an incident and increase the risk to the safety of fire fighters and the public during a response. The submitter builds fire stations to a Fire Station Design Manual and the size of the apron at the Manurewa Fire Station is already built to a practical minimum.	The submitter seeks that any proposed changes to the Manurewa Fire Station site and the immediate roading network are designed with full and transparent collaboration with the submitter to ensure any changes do not delay or impede response to an incident, nor increase the risk to the safety of fire fighters and the public during a response.

28.2	Fire and Emergency New Zealand		Other	The submitter welcomes the opportunity to work with Auckland Council on information sharing and earliest possible planning of major transportation routes to ensure positive community outcomes and an overall reduction of fatalities and injuries across Auckland.	The submitter would like to work with Auckland Transport and Auckland Council in early planning of transport routes to ensure positive community outcomes and an overall reduction of fatalities and injuries in Auckland.
29.1	Tibetian Residential Limited	Oppose	Property and land use effects	The NoR covers the whole property at 7 Alfriston Avenue, Manurewa and means the submitter will be unable to carry out improvement works necessary to be able to lease out or sell the site.	Seeks that the proposed designation be altered such that only that area of 7 Alfriston Avenue, Manurewa, as required for road widening is affected as per abutting properties, or, preferably, early acquisition of the entirety of the site immediately, or such other relief as may be appropriate.
29.2	Tibetian Residential Limited	Oppose	Lapse period	The proposed 15 year lapse period and no funding in place for the proposed frequent transit network means the NoR will have the effect of making the site at 7 Alfriston Avenue, Manurewa, unleaseable and unsellable for the foreseeable future creating 'planning blight'.	Seeks that the proposed designation be altered such that only that area of 7 Alfriston Avenue, Manurewa, as required for road widening is affected as per abutting properties, or, preferably, early acquisition of the entirety of the site immediately, or such other relief as may be appropriate.

30.1	TCK Wong Doo Trust	Oppose	Traffic and transport effects	The principal issues and impact of the proposal on 2 Weymouth Road include loss of land (carparking) and loss of vehicular access to land and effects on tenant's business or reduction of the tenant's ability to access premises, provide customer parking, provide drive through services via 2 separate roads.	Seeks unimpeded pedestrian and vehicular access for 2 Weymouth Road for the tenant's customer and staff and including for the drive-through service.
30.2	TCK Wong Doo Trust	Oppose	Social impacts	The principal issues and impact of the proposal on 2 Weymouth Road include impairment of financial return on land use, business interruption, loss of jobs as a consequence of closure of the tenant's business or reduction of the tenant's ability to access premises, provide customer parking, provide drive through services via 2 separate roads.	Seeks consideration of the financial impact on the tenants business at 2 Weymouth Road and whether the site remains fit for purpose.
31.1	KiwiRail Holdings Limited	Support	Support project	The submitter is part of Auckland's wider transport family and fully supports the development of efficient and accessible Rapid Transport Networks and Active Mode Corridors and road/highway networks which facilitate mode transfer and enable future urban growth.	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.



31.2	KiwiRail Holdings Limited	Support	Other	Where KiwiRail is the Requiring Authority for the earlier designation, approval under s.177 RMA is required. The submitter expects that as part of the process all the necessary approvals will be sought in due course.	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.
31.3	KiwiRail Holdings Limited	Support	Traffic and transport effects	that growth the capacity and resilience of the NIMT through the provision of additional tracks (as outlined in the Strategic Rail Programme) is acknowledged and accommodated as far as possible in the development and design of the Project; NoR alignments which restrict or challenge emerging rail corridor options are addressed in advance of starting detailed design; evidence that KiwiRails Engineering Principles and Standards are met; construction methodologies that reduce the need for, or the	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions.
31.4	KiwiRail Holdings Limited	Support	Conditions	Specific design areas for future discussions are allowance for future capacity upgrades of rail system including access for construction, operation and maintenance; and potential to consider if/how station can access off bridge in future design.	Seeks that the NoR be recommended for approval subject to the comments provided and the applicant's proposed conditions. Seeks ongoing dialogue and engagement before and during detailed design starts.

32.1	A and M Self	Oppose	Social impacts	<p>The designation will have social impacts - provides uncertainty in the timeframe for the project, creating anxiety to tenants and landlords. It feels unfair that we are shouldering the financial and emotional burden for something we won't benefit from.</p>	<p>Seeks that the NoR not go ahead or if it goes ahead seeks conditions: rates exemption or financial contribution from Auckland Transport until it purchases the property; at the time of purchase Auckland Transport to give financial compensation for expenses in developing the property from 1 to 3 dwellings, the loss of income from 3 rental properties and the price of purchase as if the 3 dwellings were built as per Resource Consent.</p>
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32.2	A and M Self	Oppose	Property and land use effects	The submitter is in the process of developing the property at 52C Alfriston Road, Manurewa from 1 to 3 dwellings and the designation will stop this and the money invested so far will be lost.	Seeks that the NoR not go ahead or if it goes ahead seeks conditions: rates exemption or financial contribution from Auckland Transport until it purchases the property; at the time of purchase Auckland Transport to give financial compensation for expenses in developing the property from 1 to 3 dwellings, the loss of income from 3 rental properties and the price of purchase as if the 3 dwellings were built as per Resource Consent.
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32.3	A and M Self	Oppose	Lapse period	The submitter opposes the NoR because of the uncertainty due to the extended lapse period.	Seeks that the NoR not go ahead or if it goes ahead seeks conditions: rates exemption or financial contribution from Auckland Transport until it purchases the property; at the time of purchase Auckland Transport to give financial compensation for expenses in developing the property from 1 to 3 dwellings, the loss of income from 3 rental properties and the price of purchase as if the 3 dwellings were built as per Resource Consent.
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32.4	A and M Self	Oppose	Traffic and transport effects	<p>The submitter opposes the NoR because of traffic and transport effects - uncertainty whether the median will be raised or flush and whether cars coming out of driveway at 52A Alfriston Road, Manurewa will still be able to turn right toward Claude Road; uncertainty of the design of the vehicle crossing over the pedestrian, cycle and bus lanes; and increased traffic on Alfriston Road making it harder to enter and exit property.</p>	<p>Seeks that the NoR not go ahead or if it goes ahead and designations are not put on title until the project has funding. If the NoR proceeds, seeks that the median lane will be flush to enable cars to access and egress from 52A Alfriston Road, Manurewa in both directions; provide details on how the project will improve safety and practicability for cars getting in and out of driveways and showing how the wide kerb with walking and cycling and bus lane will be crossed for easy access in and out of driveway.</p>
32.5	A and M Self	Oppose	Traffic and transport effects	<p>Submitter opposes the NoR due to uncertainty of temporary traffic management during construction to allow exit and egress from 52A Alfriston Road.</p>	<p>Seeks a schedule of temporary traffic management phases and details of alternative routes to be used if access to 52A Alfriston Road is blocked with construction.</p>

32.6	A and M Self	Oppose	Property and land use effects	Submitter opposes the NoR due to uncertainty of what will happen post construction with neighbouring properties that have full designations and that will be bought by Auckland Transport, including effects on privacy and noise and vibration effects during demolition and redevelopment as well as road construction noise, vibration and dust, meaning 6 years of effects that will make it difficult to find/retain tenants.	Seeks consultation as part of the design process for redevelopment of 52, 52B, 52C and 54 Alfriston Road and impose a thick vegetation buffer of 2m width on the boundary with 52A Alfriston Road to preserve privacy. Wishes to be kept informed of the sale of 52, 52B, 52C and 54 Alfriston Road and planned projects.
32.7	A and M Self	Oppose	Noise and vibration effects	Uncertainty of the timeframe of the project is a social impact. Negative impact on sale price of property with the uncertainty of what will be built as well as construction disruption. Uncertainty whether the daycare at 52 Alfriston Road will remain and effect on tenants.	Seeks rates exemption or compensation from Auckland Transport for the loss of rental income due to noise, dust and vibration for the duration of the building work and for the redevelopment building work of the surrounding properties as a direct consequence of the road project.
32.8	A and M Self	Oppose	Traffic and transport effects	The removal of carparks impacts negatively on the community. Public carparks are needed for tradesmen and visitors. Bus and bikes have limitations and cannot be a full substitute to cars.	NoR not go ahead or if it goes ahead seeks amendments: reinstate free public carparks in residential areas to allow for a balanced approach to transport.

33.1	Kasthuriarachchige Marlon Perera	Oppose	Property and land use effects	The submitter has built a dream home at 36A Alfriston Road, Manurewa, and will have to sacrifice that dream and feel the pain of this until and when the requiring authority decide to acquire the submitter's home.	Seeks adequate compensation for taking away dream home and future, at an above-market rate.
34.1	Auckland Council - Parks and Community Facilities	Oppose	Open space effects	The submitter opposes the NoR to the extent that significant parts of its properties at 238R Great South Road; 26R Saralee Drive; 21R, 29, 33 and 92R Alfriston Road; 21R Beaumonts Way; 22, 26 and 28 McAnnalley Street; 274 Great South Road; and 8 Selwyn Road. The adverse effects of tenants, loss of public open space, and assists are of concern to the submitter.	Avoid all effects on the properties subject of the submission, so that the properties public open space features and the submitter's assets, including the affected Housing for Elderly properties, are preserved and maintained and/or fully reinstated to the same or better condition.
35.1	Suhani Dass	Oppose	Property and land use effects; Social impacts	The submitter's parents live at 50 Alfriston Road, Manurewa and it holds sentimental value; it will be difficult to relocate and buy another property of the same value.	The submitter is not in favour of the project and does not agree to the plan.

36.1	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Positive effects	The submitter supports the provision of providing transport choices and encouraging mode shift to sustainable transport modes as the population of South Auckland continues to grow through the South FTN. The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.	The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.
36.2	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Lapse period	A lapse date of 15 years is a significant period when impacting land owned by others. This lapse date should be reduced to a maximum of 5-10 years.	The lapse date should be reduced to a maximum of 5-10 years.
36.3	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	There is potential for existing schools, or any future schools developed in this area to be affected by traffic, noise and other nuisance effects from future construction work. The submitter seeks to ensure that appropriate conditions are included in the designations to mitigate any adverse effects with the construction of the South FTN.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.



36.4	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Other	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs. The submitter supports the terms used in the NoR: Educational facility; stakeholder.	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs.
36.5	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Traffic and transport effects	Condition 19 requires the preparation of a Construction Traffic Management Plan (CTMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.

36.6	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	Condition 22 and 23 requires the preparation of a Construction Noise Vibration Management Plan (CNVMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.	The submitter supports the inclusion of proposed conditions 22 and 23 Construction Noise Vibration Management Plan, but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.
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36.7	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Urban Design effects	The submitter supports the establishment of Stakeholder Communication and Engagement Management Plan (SCEMP) (condition 9). However, the submitter considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools.	Seeks amendments to conditions to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing. This includes the requirement that at least 6 months prior to construction, the requiring authority shall identify a list of stakeholders, properties, and identify methods to engage with stakeholders and submit this record with any Outline Plan of Works for the relevant stage of work.
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37.1	Watercare Services Limited	Neutral	Network Utility Operations	Some of the NoRs interact with the submitters existing water and wastewater assets. Some of the project areas for the NoRs are within areas where the submitter has planned for future infrastructure development.	The submitter seeks to ensure that any decisions made on the NoRs respond to the issues in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services now and in the future.
37.2	Watercare Services Limited	Neutral	Network Utility Operations	The submitter has no planned projects at this time that intersect with NoR 3, although its future needs may change. Ongoing engagement is critical to maintain alignment.	The submitter seeks early engagement from the requiring authority for future planning and construction works including prior to detailed design and during implementation of construction works. For the submitter this includes applying for, in a timely manner, 'Works Over' Approvals, in compliance with the submitter's 'Water Supply and Wastewater Network Bylaw 2015 (Updated 2021).

37.3	Watercare Services Limited	Neutral	Network Utility Operations	The NoRs interact with existing water and wastewater services.	The submitter seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future, that it has access 24/7 for maintenance, safety and efficient operation of its services and that it is consulted on any works that may impact the submitter's services.
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37.4	Watercare Services Limited	Neutral	Network Utility Operations	<p>The submitter supports the intention of proposed conditions which seek to ensure that there is early engagement with relevant stakeholders during the development of the four NoRs (i.e. the conditions which require a Network Utility Management Plan, Stakeholders Communication and Engagement Management Plan and the Land Use Integration Process) but considers amendments are required so that the conditions adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.</p>	<p>The submitter seeks a new condition requiring the preparation of a 'Network Utility Strategic Outcomes Plan' (NUSOP): (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable. (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time. (c) The NUSOP shall: i. consider expected asset life of existing assets; ii. consider expected asset capacity increases or changes; and iii. Demonstrate how city and national strategic plans are considered. (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare. (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed. (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP. (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.</p>
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37.5	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks amendments to conditions so that they adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.	<p>If the amendment sought in submission 37.4 is not included, the submitter seeks amendment to the NUMP condition: (a) A NUMP shall be prepared <u>after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and prior to the lodgement of an Outline Plan of Works for a stage of construction</u> <del>Start of Construction for a Stage of Work...</del>(c) the NUMP shall be prepared in consultation...and shall include any s.177 consents required for works affecting prior Designations and Watercare 'Works Over Approvals'. (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.</p>
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37.6	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks to ensure that the decisions made on the NoRs responds to the issues raised in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services.	The submitter seeks amendments to the conditions to ensure any adverse effects on its assets and operations are avoided, remedied or mitigated and to address concerns set out in the submission.
38.1	Z Energy Limited	Oppose	Property and land use effects	The submitter operates a Z Service Station at the corner of Alfriston Road and Great South Road, Manurewa, and opposes the NoR as relates to the site, including the significant loss of site features and facilities and consequential layout of the sites that will adversely affect the operation of the service station. The project does not promote the purpose and principles of Part 2 RMA, does not adequately identify or address significant adverse effects under	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission.



38.2	Z Energy Limited	Oppose	Property and land use effects	<p>The NoR proposes to designate more than a third of the service station site and the permanent road corridor encroaches on three underground fuel tanks, the triple interceptor, site accesses, parking areas, the tanker remote fill points and all site landscaping and signage. There will be significant adverse effects on hazardous substances, traffic, stormwater, landscaping, signage, construction, social and economic considerations, which will require a redesign of the site.</p>	<p>Decline the NoR in its current form or amend to avoid, remedy or mitigate all matters of concern raised in the submission, including minimising the encroachment of the designation boundary into the submitter's sites and ensuring that any temporary or permanent effects do not impact the ability to safely operate, including with regard to access/egress, all-vehicle maneuvering, parking, stormwater treatment and drainage, storage of hazardous substances, the forecourt canopy, signage and landscaping.</p>
38.3	Z Energy Limited	Oppose	Traffic and transport effects	<p>The designation boundary encompasses all site accesses and new vehicle crossings will likely need to be reconfigured or closed. If the median on Alfriston Road is a raised median the tanker journey management plan will have to be reconfigured with</p>	<p>Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including retaining safe and convenient: entry and exit crossings including</p>

38.4	Z Energy Limited	Oppose	Property and land use effects	The proposal will have significant adverse effects on Z Manurewa and the submitter has concerns whether a redesign of the site will be viable. HSNO and WorkSafe requirements dictate layout requirements and the Auckland Unitary Plan has 2m landscaping frontage requirements.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission, including ensuring that any resultant changes will not result in the submitter being able to operate its sites lawfully.
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38.5	Z Energy Limited	Oppose	Conditions	<p>The conditions should provide more specific recognition of matters that need to be addressed at detailed design stage, relating to consultation with affected landowners and occupiers; and the extent to which feedback from affected landowners, leaseholders or occupiers is taken into account.</p>	<p>Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including ensuring that works are appropriately managed through conditions. This includes requirements to engage with the submitter in relation to both temporary construction effects and the final form of the corridor. The submitter has a particular interest in the following management plans: Stakeholder Communication and Engagement Plan; Urban and Landscape Design Management Plan; Construction Environmental Management Plan; Construction Traffic Management Plan; Construction Noise and Vibration Management Plan.</p>
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38.6	Z Energy Limited	Oppose	Conditions	The proposed conditions rely heavily on a range of management plans to address effects. The extent to which feedback from consultation with affected landowners, leaseholders or occupiers is taken into account is unclear and there should be a clear requirement that feedback be considered and implemented to the extent practicable by the requiring authority.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including ensuring that works are appropriately managed through conditions. This includes requiring Council certification that management plans achieve the specified outcomes and are not simply submitted for information.
38.7	Z Energy Limited	Oppose	Lapse period	The lengthy timeframes of a total construction duration of 2-3 years and a lapse period of 15 years, coupled with the indicative design approach of the NoR present uncertainties for the submitter and its ability to plan for the site, with corresponding adverse social and economic effects.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including amending the lapse period to 5 years, consistent with s.184 RMA.

38.8	Z Energy Limited	Oppose	Property and land use effects	The use of the phrase "or as otherwise practicable" is unclear in the context of proposed condition 4 (Designation Review) and leave the requirement to roll back too open.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including amending proposed Condition 4 (Designation Review) to: 'The Requiring Authority shall as soon as practicable, and otherwise within 12 months of Completion of Construction for each Stage of the Project...'
38.9	Z Energy Limited	Oppose	Property and land use effects	As drafted proposed Condition 8 (Management Plans) does not require the requiring authority to incorporate feedback from stakeholders.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including amending proposed Condition 8 (Management Plans) to require that the summary of comments received (required by 8(a)(iv) demonstrates how, as far as practicable, the feedback from stakeholders

38.10	Z Energy Limited	Oppose	Property and land use effects	The conditions should provide more specific recognition of matters that need to be addressed at detailed design stage, relating to consultation with affected landowners and occupiers; and the extent to which feedback from affected landowners, leaseholders or occupiers is taken into account.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including proposed Condition 9 (SCEMP) should be amended to include the requirement to prepare a schedule of sites affected and site-specific matters identified in the schedule to be addressed through consultation (refer to the Joint Witness Statement (Planning-Conditions) dated 20 September 2023 submitted to the Hearing Panel for the NW NoRs.
38.11	Z Energy Limited	Oppose	Urban design effects; Property and land use effects	The conditions should provide more specific recognition of matters that need to be addressed at detailed design stage, relating to consultation with affected landowners and occupiers; and the extent to which feedback from affected landowners, leaseholders or occupiers is taken into account.	The submitter supports proposed Condition 12(d) ULDMP.
38.12	Z Energy Limited	Oppose	Property and land use effects	It is not always just a landowner who may be affected.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including proposed Condition 15 (Existing property access) should refer to occupiers and leaseholders.

38.13	Z Energy Limited	Oppose	Social impacts	Proposed Conditions 16 (CEMP) and 19 (CTMP) do not require consultation or engagement with any party in their preparation. It is unclear from the SCEMP condition if these management plans are to be prepared in consultation with affected parties.	Decline the NoR in its current form. If not declined, amend to avoid, remedy or mitigate all matters of concern raised in the submission including either amending proposed Conditions 16 (CEMP) and 19 (CTMP) to require affected parties to be engaged with to participate in the drafting of these management plans or amending the SCEMP condition (proposed Condition 9) so that this requirement is clear.
39.1	Kāinga Ora Homes and Communities	Support in part	Positive effects	The submitter supports the outcomes to be derived from the Project.	Supports the NoR in part subject to the relief sought and matters raised in the submission being addressed.
39.2	Kāinga Ora Homes and Communities	Support in part	Social impacts	The submitter generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.	Generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.

39.3	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Further information is required in relation to bus priority measures including dedicated bus lanes and priority at intersections.	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.
39.4	Kāinga Ora Homes and Communities	Support in part	Lapse period	Further information is required in relation to reducing the lapse period from 15 to 10 years. The submitter seeks a lapse period of 10 years to encourage the project to be actioned with more urgency and in an integrated manner.	Amend Condition 5 Lapse from 15 years to 10 years to provide greater certainty and for the project to benefit communities sooner.
39.5	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Further information is required in relation to operational noise and vibration best practical option for PPFs identification and assessment; mitigation at source to within 55 dB $L_{Aeq(24h)}$ ; low noise road surface to be implemented on all roads within the designation and building modification for all PPFs to 40dB $L_{Aeq(24h)}$ inside buildings.	The operational noise levels for this project shall not exceed 55 dB $L_{Aeq(23h)}$ beyond the boundaries of the designation or, where exceeded at a sensitive receiver, mitigation is provided.



39.6	Kāinga Ora Homes and Communities	Support in part	Part 2 RMA	Amendments to the designation conditions and/or the design of the Project are sought to address the concerns of the submitter.	In the absence of the relief sought in the submission the submitter considers that the NoR is contrary to sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 RMA; and will impact on the ability of people and communities to provide for their social, economic and cultural wellbeing.
39.7	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Integration with existing sections of bus lanes along the proposed FTN corridors should be demonstrated, including whether the designation has covered sufficient spatial extent to accommodate dedicated bus provision at approaches to major intersections.	The extent of the bus lanes are shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.

39.8	Kāinga Ora Homes and Communities	Support in part	Urban design effects; Traffic and transport effects	Condition 12 (Urban and Landscape Design Management Plan) should be amended to provide for buses and a more integrated, efficient and higher capacity public transport network.	Amend Condition 12 Urban and Landscape Design Management Plan to provide for buses and a more integrated, efficient and higher-capacity public transport network and amend 12(g): "The ULDMP(s) shall include: (iii)...(f) Integration of passenger transport <u>including the provision of dedicated bus lanes and demonstrating that direct bus services can occur through major intersections.</u>
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39.9	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter's tenants often have complex needs and are highly sensitive to noise, vibration and disruption and operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants. WHO guidelines (cited in the submission) identify adverse health effects of road traffic.</p>	<p>A condition requiring operational noise levels to not exceed 55 dB <math>L_{aeq(24h)}</math> beyond the boundaries of the designation or where exceeded at a sensitive receiver, mitigation is provided.</p>
39.10	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.</p>	<p>Condition 25 (Low Noise Road Surface) is amended to require the use of low noise and vibration road surfaces for all road surfaces in the designation unless further information confirms this is not warranted from a health and safety perspective.</p>

39.11	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Where mitigation is applicable to PPFs the offer for mitigation shall be extended as per its recommended conditions in Appendix A.
39.12	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The proposed conditions freeze the receiving environment to what exists currently, ignores the future receiving environment.	The proposed conditions should be revised to require a BPO assessment prior to construction in the future that recognises the receiving environment as it exists at the time.
39.13	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Amend conditions 29-31 (Operational Conditions) as per Appendix A of the submission to address Best Practical Option (BPO) for PPFs identification and assessment; low noise road surface to be implemented on all roads within the designation; and building modification mitigation for all PPFs to 40 dB $L_{Aeq(24h)}$ inside buildings.

39.14	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 29 Low Noise Road Surface: (b) Any future resurfacing works of the Project shall be undertaken in accordance with the <u>BPO as determined in accordance with these conditions and Auckland Transport Reseal Guidelines...and asphaltic concrete surfacing (or equivalent low road surface) shall be implemented where: (i) <del>The volume of traffic exceeds 10,000 vehicles per day;</del> or (ii) <u>The road is located within the designation; or</u></u>
39.15	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 31 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (time of lodging the OPW), and revision of the Schedule 4 PPfs and their classifications, to include future planned PFFs.</u>

39.16	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 32 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
39.17	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 33: ...adopting the Best Practicable Option <del>in accordance with NZS-6806 prior to implementation.</del> <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>

39.18	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 34: The Detailed Mitigation Options shall be implemented...within twelve months of completion of construction, <u>subject to confirmation that during this 12 month period road traffic noise will remain compliant with the noise categories adopted for the NoRs and subject to confirmation that this approach is therefore the BPO, and that there are no other viable options that would permit the low road noise surface to be installed on opening.</u>
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39.19	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	<p>Amend condition 35: Prior to the Start of Construction, a Suitably Qualified Person shall identify those dwellings which, following implementation of all the Detailed Mitigation Options, <del>will not be Noise Criteria Categories A or B and where</del> <u>would still require Building-Modification Mitigation</u> <del>might be required</del> to achieve 40 dB LAeq(24h) inside Habitable Spaces ('<del>Category C Buildings</del>'). <u>For those PPFs, following the process set out in Conditions 36 to 41, it shall be determined which Building-Modification Mitigation is required to achieve 40 dB LAeq(24h) inside habitable spaces. A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 2 PPFs and their classifications, to include future planned PPFs. Any future residential or other PPFs provided for in the AUP:OP zonings shall have a BPO assessment undertaken, including mitigation measures within the Project design where practicable.</u></p>
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39.20	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>Construction in the vicinity of each <del>Category C Building</del> <u>requiring building-modification mitigation</u>, the Requiring Authority shall write to the owner of the <del>Category C Building</del>. If the building owner agrees to entry within <del>six three</del> <u>months...building envelope. If after 6 months following the date of the requiring authority's letter, no response has been received, the Requiring Authority shall again write to the owner of the Building requesting entry to assess the noise reduction performance of the existing building envelope. If the building owner agrees to entry within six months of the date of the Requiring Authority's letter, the Requiring Authority shall instruct a Suitably</u></p>
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39.21	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>Amend condition 37: For each <del>Category C</del> Building requiring Building-Modification Mitigation identified, the Requiring Authority is deemed to have complied with Condition 36 above if...(c) The building owner did not agree to entry within <del>six</del> <u>three</u> months of the date of the Requiring Authority's <u>last</u> letter.... If any of (b) to (d) above apply to a <del>Category C</del> Building, the Requiring Authority is not required to implement Building-Modification Mitigation to that building.</p>
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39.22	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 38: Subject to Condition 37 above,....write to the owner of each <del>Category C</del> Building <u>requiring Building-Modification Mitigation</u> advising:...(b) The options available, <u>at the cost of the Requiring Authority</u> , for Building-Modification Mitigation...(c ) That the owner has <u>24 <del>three</del> months from completion of construction of the relevant section of the project</u> to decide whether to accept...more than one option is available.
39.23	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 39: Once an agreement on Building-Modification Mitigation is reached between the Requiring Authority and the owner of a <del>Category C</del> Building <u>requiring Building-Modification Mitigation</u> , the mitigation shall be implemented <u>at the Requiring Authority's expense</u> ,....

39.24	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>Amend condition 40: (c) The building owner did not accept the Requiring Authority's offer to implement Building-Modification Mitigation <u>within 24 months of completion of construction of the relevant section of the Project; three months of the date of the Requiring Authority's letter sent in accordance with Condition 37 (including where the owner did not respond within that period);</u> or (d) The building owner cannot, after reasonable enquiry, be found <u>within 24 months of the prior to completion of construction of the Project.</u></p>
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39.25	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend Condition 41: The Detailed Mitigation Options shall be maintained <u>by the Requiring Authority</u> so they retain their noise reduction performance as far as practicable.
40.1	Nilkunt Trustee Company Limited	Oppose	Property and land use effects	The NoR cuts across the property in a significant way so as to render the property at 120 Alfriston Road unusable.	The submitter objects to the proposal.
40.2	Nilkunt Trustee Company Limited	Oppose	Social impacts	120 Alfriston Road operates as a childcare centre and this proposal will cause a significant health and safety issue for the childcare tenant and children.	The submitter objects to the proposal.
40.3	Nilkunt Trustee Company Limited	Oppose	Social impacts	The draft plan shows temporary construction area and the area where access earth may be placed while carrying out excavations that cut across the submitter's property at 120 Alfriston Road, so as to render the property unusable.	The submitter objects to the proposal.

40.4	Nilkunt Trustee Company Limited	Oppose	Property and land use effects	The property is leased to a childcare operator tenant who also objects to any part of the leased area being used for road and amenities upgrade. The entire childcare outdoor amenities for children to play in is affected and this will cause a health and safety issue for the tenant and children.	The submitter objects to the proposal.
40.5	Nilkunt Trustee Company Limited	Oppose	Social impacts	If the outdoor amenities area is taken away by the proposed works the tenant's early childcare licence will be under threat and is likely to lead to a cancellation of the licence by the Ministry of Education. This will lead to significant financial loss and the community potentially would be deprived of a childcare centre in this area.	The submitter objects to the proposal.
40.6	Nilkunt Trustee Company Limited	Oppose	Property and land use effects	The permanent footpath encroaches into 120 Alfriston Road and the submitter will suffer diminution in value and compensation will be claimed.	The submitter objects to the proposal.

Notice of Requirement - NoR 4: South Frequent Transit Network: Takaanini FTN – Porchester Road and Popes Road Upgrades					
Summary of Submissions					
Sub #	Submitter Name	Oppose/Suppo	Topics	Summary of Key Issues	Relief Sought
1.1	8 bledisloe limiteded	Oppose	Property and land use effects; Social Impacts	The submitter does not know the extent of the works required on their property at 1/160 Porchester Road, Takanini and how it affects them and the value of their property. Wishes to sell as very stressed by the notice.	Seeks a written response regarding what works will be undertaken on their property at 1/160 Porchester Road, Takanini, when this will likely happen, and how they will be compensated for the land and the stress.
2.1	Hemant Hemant	Neutral	Traffic and Transport effects; Noise and Vibration	The submitter is concerned with more traffic using Stratford Road, and in particular Tipper trucks, which drop rubbish and soil on the road and use engine brakes that creates a noise problem.	Seeks that the use of Stratford Road by Tipper trucks using the Hill Road exit from the motorway is stopped.
3.1	George Khamis	Oppose	Noise and vibration; Social Impacts	The project will take so long and construction noise, traffic and dust will affect the submitter and their family at 11 Zoe Court, Manurewa.	Stop this project.
4.1	Awdisho Khamis	Oppose	Social impacts	Knowing that the project will affect the submitter's house at 11 Zoe Court, Manurewa is affecting the mental health of the submitter.	Stop this project.

5.1	Dianne and Neville Smith	Oppose	Flooding effects; Social Impacts	The submitter is strongly against the designating of the front paddock of their property at 52 Popes Road for a storm water detention pond. Taking land for a stormwater pond will adversely affect the christmas tree farm operated at the property; and will prevent plans for developing the land when it is rezoned from Future Urban.	Seeks that if the stormwater retention pond is absolutely necessary that it be located to the rear of 52 Popes Road, under the transmission lines.
5.2	Dianne and Neville Smith	Oppose	Flooding effects; Urban Design effects	The submitter considers locating a footpath next to a 1m deep drain is dangerous for pedestrians. If there is to be no widening of the bridge or repositioning of the drain then there is no need for the submitter's land to be taken for road widening. The creek needs to be widened and straightened for a long-term solution to enable growth in the area, as it was over-flowing during the Auckland Floods in early 2023.	Suggests that open drain on Porchester Road be piped under the round to the southwestern side of the bridge and an outlet feed directly into the creek, avoiding the need for the stormwater to flow under the bridge. The creek needs to be widened and straightened.
5.3	Dianne and Neville Smith	Oppose	Traffic and Transport effects	The submitter supports the upgrade of the intersection of Porchester and Popes Road but feel that traffic lights would be more suitable for this intersection.	The submitter supports the upgrade of the intersection of Porchester and Popes Road but feel that traffic lights would be more suitable for this intersection.



5.4	Dianne and Neville Smith	Oppose	Traffic and Transport effects; Noise and Vibration; Social Impacts	The submitter would like to see the construction zone around their dwelling at 52 Popes Road minimised. The current plan would prevent the submitter from using their garage and it is very close to the dwelling. This would put the dwelling an unsafe distance to the roundabout and put foundations at risk from the earthworks.	Seeks that the construction zone around their dwelling at 52 Popes Road is minimised and wishes to retain ownership of as much of their land as possible.
5.5	Dianne and Neville Smith	Oppose	Traffic and Transport effects; Property and land use effects	The current plan is very close to the dwelling and would put it at an unsafe distance to the roundabout.	Seeks some sort of concrete barrier/fence at the closest corner of their dwelling at 52 Popes Road.
6.1	Continuous Spouting Auckland	DNS	Property effects; Social Impacts	The submitter operates a business at 94 Takanini School Road with up to 50 staff and contractors and the NoR and the disruption will have a significant impact on the employees, customers and negatively impact health and wellbeing and financial outcomes.	Seeks reconsideration of the earthworks and temporary construction areas on 94 Takanini School Road and for these areas to be redrawn to exclude the property.
6.2	Continuous Spouting Auckland	DNS	Property and land use effects; Traffic and transport effects	The need to purchase land can be avoided by adjusting the model to reduce the earthworks at the entrance to the driveway of 94 Takanini School Road. Relocation of the submitter's scrap metal bin and the need for staff to park elsewhere onsite due to the removal of up to 6 parking spaces in the blue hatched area will be disruptive over the period of the development.	Seeks adjustment of the model to remove the designated earthworks from the plan as affects 94 Takanini School Road and removal of the blue hatched area. The opposite side of Takanini School Road would be better suited as a temporary construction area and place to store machinery and equipment.

7.1	Graeme & Anna Goldring	Oppose	Property and land use effects; Social Impacts	The submitter is concerned with the devaluation of their property at 160 Manuroa Road, Takanini and difficulty in selling it due to the NoR. Having to deal with the uncertainty of what will happen with their property going forward has caused stress and anxiety.	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.
7.2	Graeme & Anna Goldring	Oppose	Property and land use effects; urban design effects	The designation boundary is 1m from the submitter's front door at 160 Manuroa Road, Takanini. The submitter will not have access to the front of their property.	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.
7.3	Graeme & Anna Goldring	Oppose	Traffic and transport effects	The submitter's property at 160 Manuroa Road has two gateways which allows them to drive in and out of the property to avoid backing out into traffic. The proposal will mean losing one gateway and this will not be safe with the increase in traffic volumes.	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.
7.4	Graeme & Anna Goldring	Oppose	Traffic and transport effects; urban design effects	A shared footpath/cycle way has already been constructed by Classic Development as a part of their consent to build 83 dwellings in Nancy Wake Street, next to the submitter's property. If a shared pathway is implemented then less of the submitter's land would be required.	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.

7.5	Graeme & Anna Goldring	Oppose	Noise and vibration; Social Impacts	The submitter is concerned with noise and dust during construction and notes that the soils are peat and already subject to severe vibration from heavy traffic. The submitter envisages there will be compacting and vibrations experienced during this project.	Seeks more definite information e.g. date and length of construction, what or if there is any compensation, or cease the project.
8.1	Amrik Singh Grewal and Simranjeet Kaur Grewal	Oppose	Social impacts; Property and land use effects	The submitter bought 31 Calument Way, Takanini on 2 September 2023 because of its spacious backyard for the family to use and now this space will be taken away and the happiness of the submitter and family is broken. The designation boundary touches the house and the submitter will lose privacy and safety.	Seeks that the project be refused or the government should buy the submitter's whole land instead of taking a little part of the land and should give the submitter the profit.
8.2	Amrik Singh Grewal and Simranjeet Kaur Grewal	Oppose	Noise and vibration effects	The submitter is concerned that whenever a heavy vehicle goes past the house at 31 Calumet Way shakes. After taking land the fence will be close to the wall whereby shaking can be increased and cause damage to house.	Seeks that the project be refused or the government should buy the submitter's whole land instead of taking a little part of the land and should give the submitter the profit.
8.3	Amrik Singh Grewal and Simranjeet Kaur Grewal	Oppose	Property and land use effects	The project will reduce the market value of 31 Calumet Way, Takanini and no one will want to buy it.	Seeks that the project be refused or the government should buy the submitter's whole land instead of taking a little part of the land and should give the submitter the profit.

9.1	Hussain Rahimi	Oppose	Property and land use effects	The submitter considers it is uneconomical to widen the road in front of 22 Popes Road because they have built 3 large warehouses on the property. With the current 12.5m widening it will leave no footpath crossing or fencing.	Seeks the vacant land at 2 Popes Road owned by Council is swapped for the submitter's land at 22 Popes Road.
10.1	Akalmurat Singh Hora	Oppose	Property and land use effects	The proposed construction poses a significant threat to the structural integrity of the submitter's property at 200 Alfriston Road, Manurewa, due to its elevated position. The absence of a plan for a retaining wall raised concerns about potential ground instability and likelihood of future cracks.	Seeks the concerns mentioned in the submission are considered.
10.2	Akalmurat Singh Hora	Oppose	Property and land use effects	The proposed changes will exacerbate the existing steepness of the driveway at 200 Alfriston Road, impeding maneuvering and affecting accessibility.	Seeks the concerns mentioned in the submission are considered.
10.3	Akalmurat Singh Hora	Oppose	Noise and vibration; Social Impacts	The existing noise pollution levels already has a detrimental effect on mental health and quality of life. The anticipated construction noise will further exacerbate these concerns.	Seeks the concerns mentioned in the submission are considered.
10.4	Akalmurat Singh Hora	Oppose	Traffic and transport effects	The current bus stop near the intersection of Alfriston and Porchester Road presents safety hazards and it should be relocated to a safer distance from the intersection.	Seeks relocation of bustop to the back of 11 or 13 Zoe Ct or in proximity to 170 Alfriston Road ensuring safety and privacy concerns are addressed.

10.5	Akalmurat Singh Hora	Oppose	Traffic and transport effects	The submitter questions the need for proposed changes such as the underused cycle lane on Alfriston Road.	Seeks reevaluation of the necessity of the underused cycle land and consider repurposing the area to facilitate an improved bus service.
10.6	Akalmurat Singh Hora	Oppose	Traffic and transport effects	Seeks traffic flow improvement: address the bottleneck issue at the bridge over the motorway to ensure traffic flow efficiency.	Seeks traffic flow improvement: address the bottleneck issue at the bridge over the motorway to ensure traffic flow efficiency.
11.1	Telecommunication Submitters	Oppose	Network Utility Operations	The Network Utility Management Plan condition is not the same as has been agreed with the Airport to Botany and Northwest Transport Projects. The updated clause d inclusion of the wording "during detailed design" has not been included. Key to the outcomes the submitters seek is to ensure they are adequately consulted over effects on their existing infrastructure as well as being provided the opportunity to discuss any future requirements so they can be considered in the project design.	Amend the Network Utility Management Plan condition clause d to read: "(d) the development of the NUMP shall consider opportunities to coordinate future work programmes with out network utility operator(s) <u>during the further project stages including detailed design</u> where practicable."

11.2	Telecommunication Submitters	Oppose	Network Utility Operations	The 'design stage' is not an actual stage but is instead progressive and for clause d in the NUMP condition to be more effective it should be amended. It is reasonable for there to be provisions to ensure telecommunication works/opportunities are properly considered during the design phase through consultation with network utility operators. The AEE does not list all affected utility operators.	The outcomes the submitter seeks is to ensure they are adequately consulted by the requiring authority over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design.
11.3	Telecommunication Submitters	Support	Network Utility Operations	Condition 2 Project Information will ensure the requiring authority will contact Spark directly as an affected landowner and Spark supports condition 2. Conditions 3,16, 21, 22 and 28 (subject to the proposed amendment) are also supported in regard to providing protection to the data centre during construction.	Retain Conditions 2 Project Information; Condition 3 Land Integration Process; Condition 16 Construction Environmental Management Plan; Condition 21 Construction Vibration Standards; Condition 22 Construction Noise and Vibration Management Plan and (subject to requested amendments) Condition 28 Network Utility Management Plan.

11.4	Telecommunication Submitters	Oppose	Property and land use effects	The submitter's data centre at 23 Popes Road is impacted by the NoR. Spark would prefer no impact on the site and acknowledges the reduction in the affected area from discussions with Auckland Transport. The submitter would oppose any further encroachment of the site and seeks confirmation that the ownership of the designated land remains with the submitter, is not subject to land acquisition given the proposed works are only temporary during road construction.	The submitter would oppose any further encroachment of its site at 23 Popes Road and seeks confirmation that the ownership of the designated land remains with the submitter and is not subject to land acquisition given the proposed works are only temporary during road construction.
12.1	Narsing rao nashamuni and Navitha sreeram	Support	Property and land use effects	Supports public transport.	Seeks compensation of the property or land taken at 3/286 Porchester Road, Takanini.
13.1	Mega Food Services Limited	Oppose	Property and land use effects	The submitter owns 495 Porchester Road and the submission relates to NoR 4 as a whole. The area of land to be designated is much greater than what is required for the proposed road upgrade design and has the effect of limiting or preventing future development opportunities for land subject to the designation.	Seeks that the spatial extent of the designation boundary be reviewed and reduced to minimise the required land take and reflect the actual and reasonable area needed to accommodate the appropriate future design for the upgrade of Porchester Road.

13.2	Mega Food Services Limited	Oppose	Property and land use effects	The submitter owns 495 Porchester Road and the submission relates to NoR 4 as a whole. The area of land to be designated is much greater than what is required for the proposed road upgrade design and has the effect of limiting or preventing future development opportunities for land subject to the designation.	Seeks that the designation boundary be amended to show the operational extent around what will be legal road reserve and the construction extent, as two separate designation boundaries.
13.3	Mega Food Services Limited	Oppose	Lapse period; Social Impacts	The proposed 15 year lapse period is excessive and needs to be reduced. The extended lapse period will prevent future development opportunities progressing in an integrated manner and will sterilise the land until funding is allocated.	Seeks that the lapse date is reduced to 5 years consistent with s.184(1) RMA.
13.4	Mega Food Services Limited	Oppose	Urban Design effects; Property and land use effects	The submitter broadly supports proposed Condition 3 Land Use Integration Process and seeks that it be amended to clarify the discussions will be two-way collaboration and for transport infrastructure to align with proposed land use.	Amend proposed Condition 3 Land Use Integration to clarify that this is an avenue for two-way collaboration between the requiring authority and the development community for the purposes of integration of transport infrastructure and land use; and that this is not simply for land use to coordinate with transport infrastructure, but where appropriate, transport infrastructure may be amended to align with or accommodate proposed land use.



13.5	Mega Food Services Limited	Oppose	Property and land use effects	The NOR includes a raft of conditions where management plans are to be provided "prior to construction" and these trigger would be more useful if amended to "at the time the Outline Plan is applied for", e.g. proposed Conditions 9, 12 and 16.	The NOR includes a raft of conditions where management plans are to be provided "prior to construction" and these trigger would be more useful if amended to "at the time the Outline Plan is applied for", e.g. proposed Conditions 9, 12 and 16.
13.6	Mega Food Services Limited	Oppose	Property and land use effects	The submitter owns 495 Porchester Road and the submission relates to NoR 4 as a whole. The area of land to be designated is much greater than what is required for the proposed road upgrade design and has the effect of limiting or preventing future development opportunities for land subject to the designation.	Seeks that Schedule 1 of the proposed conditions be amended following review of the extent of the designation boundary, review of the lapse date and amendments to proposed Condition 3 Land Use Integration Process.
14.1	BJ Wallace Trust and SJ Wallace Trust	Oppose	Property and land use effects	The submitter owns the property at 296 Porchester Road, Takanini, at the corner of the intersection of Porchester Road and Popes Road in Takanini and its concerns relate to the NoR in its entirety. The submitter is concerned there is insufficient evidence for the extent of the designation being reasonably necessary to achieve the objectives of the NoR.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.

14.2	BJ Wallace Trust and SJ Wallace Trust	Oppose	Alternative routes, sites, methods	The submitter says the consideration of alternative sites, routes and methods for the project has failed to undertake a proper consideration of alternatives that use a lesser extent of land and/or have lesser environmental effects than the preferred option. The submitter says the objectives of the designation can be achieved through an alternative route that will reduce the extent of private land required and reduce the level of adverse environmental effects.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.3	BJ Wallace Trust and SJ Wallace Trust	Oppose	Property and land use effects	The submitter is concerned with adverse effects of the project during the construction phase and the extent of the designation footprint being taken for construction of the project. The construction zone buffer results in a significantly larger amount of land being designated which directly impacts the submitter's land at 296 Porchester Road, for over 650m of road frontage along Porchester and Popes Road.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.4	BJ Wallace Trust and SJ Wallace Trust	Oppose	Traffic and transport effects	The submitter is concerned with effects on the existing access points to 296 Porchester Road – two to Porchester Road, and one to Popes Road. The proposal is to restrict access to 296 Porchester Road, cutting off all three access points to the site.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.

14.5	BJ Wallace Trust and SJ Wallace Trust	Oppose	Property and land use effects	The submitter is concerned with the adverse effects of the NoR in restricting the ability to implement approved resource consents at 296 Porchester Road, including approved stormwater response, access, landscaping and fencing.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.6	BJ Wallace Trust and SJ Wallace Trust	Oppose	Flooding effects	The proposal to use the front yard of 296 Porchester Road as temporary construction area conflicts with the consented stormwater solution for the full development of 296 Porchester Road.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.7	BJ Wallace Trust and SJ Wallace Trust	Oppose	Flooding effects	That conflict can be avoided by removing the temporary construction area. If it is essential, then the submitter needs to be able to install the stormwater infrastructure and have the requiring authority reinstate it when they give effect to the designation.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.8	BJ Wallace Trust and SJ Wallace Trust	Oppose	Flooding effects	The Porchester and Popes Road design needs to ensure that no new stormwater flow will enter the site. The Q100 flow should continue to be conveyed over Popes Road to the overland flow path to the north of 296 Porchester Road.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.

14.9	BJ Wallace Trust and SJ Wallace Trust	Oppose	Property and land use effects	The submitter is concerned with adverse effects of the project when completed and operational. Some parts of 296 Porchester Road are required for the physical road works. The submitter needs certainty that this land will be acquired by the requiring authority at the time development commences on the site.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.10	BJ Wallace Trust and SJ Wallace Trust	Oppose	Urban Design effects	The requiring authority should be required to ensure that the FTN achieves compliance with the landscape and precinct plans for the Takanini Precinct in the AUP(OP).	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.11	BJ Wallace Trust and SJ Wallace Trust	Oppose	Urban Design effects; Property and land use effects	The submitter's property at 296 Porchester Road will be impacted by the final shape of the landholding resulting from the designation. The NoR will create a rounded corner in the northern portion of the site. This will result in a compromised development with an inefficient block size of 1-1.5ha of light industrial zoned land.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
14.12	BJ Wallace Trust and SJ Wallace Trust	Oppose	Lapse period; Social Impacts	There is a lack of cogent evidence supporting the proposed extended 15 year lapse date. It is unreasonable and unfair to expect a landowner to endure planning blight for 15 years and it will create uncertainty for landowners. This is exacerbated by no secured funding for the works and the requiring authority has no interest in much of the designated route.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.

14.13	BJ Wallace Trust and SJ Wallace Trust	Oppose	Property and land use effects	The submitter is concerned that in the event the NoR is confirmed, the proposed mitigation and conditions will not adequately mitigate the actual and potential adverse effects of the project on 296 Porchester Road. Conditions should be imposed to ensure the minimum practicable impact on the site especially in terms of access, stormwater, landscaping and fencing and services.	Seeks that the requirement is withdrawn or in the alternative as secondary relief that the requirement is modified or made subject to conditions to address all of the concerns raised in the submission.
15.1	Zabeel Investments Ltd	Oppose	Property and land use effects	The submitter owns 354 Porchester Road, Takanini, which accommodates a Placemakers, Mobil service station and a logistics warehouse, which are activities constructed and operated under approved land use consents. The submitter has also been advancing plans for a fast food outlet on the undeveloped corner of the site. The designation would stand in the way of reasonable use of the land as proposed by its owner.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.2	Zabeel Investments Ltd	Oppose	Traffic and transport effects	It is not clear whether the necessity for the project or traffic modeling take into account the removal of a large area of land from future development in the Future Development Strategy adopted 2 November 2023.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.

15.3	Zabeel Investments Ltd	Oppose	Alternative routes, sites, methods	The NoR and Assessment of Alternatives is flawed as it does not appropriately account for or place a greater weight on the loss of zoned urban land over future urban zone or downzoned land. The NOR in this location should be modified to avoid the loss of urban zoned land.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.4	Zabeel Investments Ltd	Oppose	Traffic and transport effects	The recently upgraded facilities on the western side of Porchester Road are fit for purpose today and in the future. The western side of Porchester Road was upgraded in 2016, with a widened carriageway, 3m shared path, upgraded utility services and piped stormwater system that connects to the recently constructed Council wetland at the end of Takanini School Road.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.5	Zabeel Investments Ltd	Oppose	Traffic and transport effects	The Porchester/Popes Road intersection is the only one comprising a double lane roundabout with 2 approach and 2 exit lanes. This is inconsistent with other, single lane, intersections on Popes and Porchester Road.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.

15.6	Zabeel Investments Ltd	Oppose	Traffic and transport effects; urban design effects	The proposed active mode crossings at the Porchester/Popes Road intersection is not safe and is contrary to Auckland Transport's design manual and NZTA guidance. Crossing points on a four lane road should be signalised and would typically be provided mid-block.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.7	Zabeel Investments Ltd	Oppose	Traffic and transport effects	There has been no assessment of alternatives on the number of lanes or intersection layout for the Porchester Road/Popes Road intersection.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.8	Zabeel Investments Ltd	Oppose	Property and land use effects	A designation of live-zoned urban land should only be on the basis of detailed design where it is certain the land is required.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.9	Zabeel Investments Ltd	Oppose	Property and land use effects	The requiring authority must show a need for the designation. It may have done so in the generality but has failed to do so for the specific impact on the submitter's land at 354 Porchester Road.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.

15.10	Zabeel Investments Ltd	Oppose	Lapse period; Social Impacts	A 10 year extension to the ordinary 5 year lapse period may be appropriate in currently undeveloped areas, making sure landowners are alive to the restrictions on their land, but not in an already urbanised zone.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.11	Zabeel Investments Ltd	Oppose	Traffic and transport effects; flooding effects	The concept design and NoR boundary/location will create integration problems for development of 354 Porchester Road, including contours and future swales that appear to preclude additional access points onto Popes Road, and uncertainty existing access, particularly right hand turns, will be maintained.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.12	Zabeel Investments Ltd	Oppose	Urban Design effects; Landscape and visual effects	If the landscaping requirements of the Takanini Precinct and Precinct Plan cannot be met because of the designation, proposed development will have non-complying activity status under Rule 1438.6.1.8(2). Required landscaping must not be compromised during construction of the designated works.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.



15.13	Zabeel Investments Ltd	Oppose	Property and land use effects; Landscape and visual effects	There is no mechanism proposed to address the resultant non-compliance with approved land use consents. The submitter must continue to comply with conditions of approved land use consents which include landscaping along the frontage of 354 Porchester Road and carparking areas.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.14	Zabeel Investments Ltd	Oppose	Flooding effects	The Assessment of Flooding Effects Report by SGA provides no specific assessment for Porchester Road between the Papakura stream bridge and Popes Road bridge despite there being a 200 cumec flow at that point, a large portion of which flows across onto the subject site.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.15	Zabeel Investments Ltd	Oppose	Flooding effects	Leaving the status quo on the western side of Porchester Road by moving the works to the eastern side of Porchester Road will avoid adversely affecting flood levels, conveyance of overland flows and floor level freeboards at 354 Porchester Road.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.16	Zabeel Investments Ltd	Oppose	Flooding effects	Conveyance and treatment of stormwater on Popes Road and the west side of Porchester Road by swales in unnecessary due to the Council's new wetland.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.

15.17	Zabeel Investments Ltd	Oppose	Property and land use effects	Each management plan should be required to achieve a clear objective and Council should retain a role of certifying that the objective has been achieved in accordance with the approach long-approved by the Environment Court.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.18	Zabeel Investments Ltd	Oppose	Urban design effects	The LUIP proposed condition does not address the timeframe before confirmation of the designation. The submitter intends to lodge applications on its site imminently.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.19	Zabeel Investments Ltd	Oppose	Flooding effects	The LUIP proposed condition does not require the Requiring Authority to provide flood modeling updates to adjoining development.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.20	Zabeel Investments Ltd	Oppose	Property and land use effects	The LUIP proposed condition gives no certainty that working with the Requiring Authority through this process will result in s.176 approval.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.21	Zabeel Investments Ltd	Oppose	Property and land use effects	Condition 7 Outline Plans enables a Requiring Authority to pick and choose which management plans are relevant to each 'stage' and to determine what forms each 'stage'.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.

15.22	Zabeel Investments Ltd	Oppose	Urban design effects	The SCEMP does not include any resolution process for where concerns of the landowner are not being adequately addressed by the outline plan / management plans.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.23	Zabeel Investments Ltd	Oppose	Urban Design effects; Landscape and visual effects	The ULDMP should be utilised as a tool for refinement and implementation of a design which is already of a standard that will achieve quality urban design and landscape outcomes, as opposed to a tool to fix the current concept plan.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.24	Zabeel Investments Ltd	Oppose	Urban Design effects; Landscape and visual effects	There is no obligation in the ULDMP condition for stakeholder participation to continue through the detailed design or to participate in earlier designs (e.g enabling works) which ultimately affect decisions and outcomes in the ULDMP.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.25	Zabeel Investments Ltd	Oppose	Urban Design effects; Landscape and visual effects	The ULDMP should also include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
15.26	Zabeel Investments Ltd	Oppose	Flooding effects	The project should not enable any increase in flood hazard on any sites.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.

15.27	Zabeel Investments Ltd	Oppose	Traffic and transport effects	The Management Plans should be required to maintain vehicle and pedestrian access to any business at all times during the work.	Seeks that the NoR be withdrawn or in the alternative that the NoR be removed from the site at 354 Porchester Road and that the proposed rapid transit network is located on the Future Urban zoned land to the east of the current Porchester Road alignment.
16.1	Alda Investments Limited	Oppose	Property and land use effects	The submitter holds a resource consent (copy attached to the submission) to develop the sites at 164-166 Porchester Road, Takanini with two four level apartment blocks carrying 42 residential units. The apartment building cannot be constructed without using the area that is proposed to be designated. It is not clear whether the necessity for the project or traffic modeling take into account the removal of a large area of land from future development in the Future Development Strategy adopted 2 November 2023.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require an appropriate roading design that caters for realistic future demand and recognises the value and importance of existing investment, minimises intrusions upon private land and eliminates the designation from 164-166 Porchester Road.
16.2	Alda Investments Limited	Oppose	Property and land use effects	The resource consent that has been granted for two four level apartment blocks at 164-166 Porchester Road, Takanini may now require s.178 RMA approval from the Requiring Authority. This is an unwarranted impost upon an approved development.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require the Requiring Authority to provide approval under s.s176 or 178 if required to allow the construction of the 42 consented dwelling units on 164-166 Porchester Road.

16.3	Alda Investments Limited	Oppose	Noise and vibration effects; Traffic and transport effects	There is insufficient information to ensure that noise received at the outdoor living spaces of the proposed units at 164-166 Porchester Road, Takanini will maintain the usability of these spaces during works and following completion of the road (based on the new road volumes). This is particularly acute given that NoR 2 and 4 provide different future traffic volumes (refer page 7 of the submission) and the adequacy of any noise assessment is therefore questionable.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that ensure that noise levels received at the units to be constructed at 164-166 Porchester Road are reasonable and that mitigation is installed as the units are built.
16.4	Alda Investments Limited	Oppose	Noise and vibration effects	There is insufficient information and conditions to ensure construction effects will not damage the proposed apartment building at 164-166 Porchester Road, Takanini. Insufficient information is provided to demonstrate that the designated works can proceed without undermining the foundations of the units.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that ensure there is no damage to the buildings to be constructed at 164-166 Porchester Road, including their foundations.
16.5	Alda Investments Limited	Oppose	Traffic and transport effects	No specific provision has been made to ensure residents are able to be accessed by emergency services at all times.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that secure access for residents, including by emergency services, during construction.

16.6	Alda Investments Limited	Oppose	Traffic and transport effects	Maintenance of pedestrian accessibility is essential for the future residents of 164-166 Porchester Road.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that provide a safe pedestrian environment on the upgraded roads adjacent to 164-166 Porchester Road.
16.7	Alda Investments Limited	Oppose	Flooding effects	There is no assurance that flooding or ponding of the carpark for the apartments proposed at 164-166 Porchester Road will be avoided. It is essential the health and safety of vulnerable residents is assured.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that avoid flooding impacts on the buildings and carparking at 164-166 Porchester Road.
16.8	Alda Investments Limited	Oppose	Noise and vibration	The apartments are under construction now and any required mitigation for future road noise should be installed at the same time.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require management plans to be certified by Council against a sensible purpose.
16.9	Alda Investments Limited	Oppose	Landscape and visual effects	The designation and associated works will remove features of the approved resource consent for two four level apartment blocks at 164-166 Porchester Road, Takanini. There is no mechanism proposed to address the resultant non-compliance with the approved land use consents.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.

16.10	Alda Investments Limited	Oppose	Urban design effects	The is insufficient information to manage privacy and screening for units from the works occurring directly adjacent to outdoor living spaces.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.11	Alda Investments Limited	Oppose	Traffic and transport effects	The submitter is concerned with uncertainty and inconsistency in design responses. NoR 4 provides design responses that differ to those in NoR 2. NoR 2 proposes a 2-lane cross section with central median that ties into the existing roundabout; whereas NoR 4 provides signalisation of the Porchester Road / Walters Road intersection. The resource consent for apartment blocks at 164-166 Porchester Road is based on a road cross section consistent with NoR 2.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.12	Alda Investments Limited	Oppose	Property and land use effects	Each management plan should be required to achieve a clear objective and Council should retain a role of certifying that the objective has been achieved in accordance with the approach long-approved by the Environment Court.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.13	Alda Investments Limited	Oppose	Property and land use effects	The LUIP only addresses the timeframe between confirmation of the designation and the start of construction. The proposed apartment building at 164-166 Porchester Road is under construction now.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.

16.14	Alda Investments Limited	Oppose	Property and land use effects	Condition 7 Outline Plans enables a Requiring Authority to pick and choose which management plans are relevant to each 'stage' and to determine what forms each 'stage'.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.15	Alda Investments Limited	Oppose	Social impacts; Urban design effects	The SCEMP does not include any resolution process for where concerns of the landowner are not being adequately addressed by the outline plan / management plans.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.16	Alda Investments Limited	Oppose	Urban design effects, Landscape and visual effects	The ULDMP should be utilised as a tool for refinement and implementation of a design which is already of a standard that will achieve quality urban design and landscape outcomes, as opposed to a tool to fix the current concept plan.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.17	Alda Investments Limited	Oppose	Urban design effects, Landscape and visual effects	There is no obligation in the ULDMP condition for stakeholder participation to continue through the detailed design or to participate in earlier designs (e.g enabling works) which ultimately affect decisions and outcomes in the ULDMP.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.18	Alda Investments Limited	Oppose	Urban design effects, Landscape and visual effects	The ULDMP should also include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
16.19	Alda Investments Limited	Oppose	Flooding effects	The project should not enable any increase in flood hazard on any sites.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.



16.20	Alda Investments Limited	Oppose	Traffic and transport effects	The Management Plans should be required to maintain vehicle and pedestrian access to any business at all times during the work.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.1	D E Nakhle Investment Trust	Oppose	Property and land use effects	The submitter owns the site at 164-166 Porchester Road, Takanini. A resource consent (copy attached to the submission) has been granted to develop the sites with two four level apartment blocks carrying 42 residential units. The apartment building cannot be constructed without using the area that is proposed to be designated. It is not clear whether the necessity for the project or traffic modeling take into account the removal of a large area of land from future development in the Future Development Strategy adopted 2 November 2023.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require an appropriate roading design that caters for realistic future demand and recognises the value and importance of existing investment, minimises intrusions upon private land and eliminates the designation from 164-166 Porchester Road.
17.2	D E Nakhle Investment Trust	Oppose	Property and land use effects	The resource consent that has been granted for two four level apartment blocks at 164-166 Porchester Road, Takanini may now require s.178 RMA approval from the Requiring Authority. This is an unwarranted impost upon an approved development.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require the Requiring Authority to provide approval under s.s176 or 178 if required to allow the construction of the 42 consented dwelling units on 164-166 Porchester Road.

17.3	D E Nakhle Investment Trust	Oppose	Noise and vibration effects; Traffic and transport effects	There is insufficient information to ensure that noise received at the outdoor living spaces of the proposed units at 164-166 Porchester Road, Takanini will maintain the usability of these spaces during works and following completion of the road (based on the new road volumes). This is particularly acute given that NoR 2 and 4 provide different future traffic volumes (refer page 7 of the submission) and the adequacy of any noise assessment is therefore questionable.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that ensure that noise levels received at the units to be constructed at 164-166 Porchester Road are reasonable and that mitigation is installed as the units are built.
17.4	D E Nakhle Investment Trust	Oppose	Noise and vibration effects	There is insufficient information and conditions to ensure construction effects will not damage the proposed apartment building at 164-166 Porchester Road, Takanini. Insufficient information is provided to demonstrate that the designated works can proceed without undermining the foundations of the units.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that ensure there is no damage to the buildings to be constructed at 164-166 Porchester Road, including their foundations.
17.5	D E Nakhle Investment Trust	Oppose	Traffic and transport effects	No specific provision has been made to ensure residents are able to be accessed by emergency services at all times.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that secure access for residents, including by emergency services, during construction.

17.6	D E Nakhle Investment Trust	Oppose	Traffic and transport effects	Maintenance of pedestrian accessibility is essential for the future residents of 164-166 Porchester Road.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that provide a safe pedestrian environment on the upgraded roads adjacent to 164-166 Porchester Road.
17.7	D E Nakhle Investment Trust	Oppose	Flooding effects	There is no assurance that flooding or ponding of the carpark for the apartments proposed at 164-166 Porchester Road will be avoided. It is essential the health and safety of vulnerable residents is assured.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that avoid flooding impacts on the buildings and carparking at 164-166 Porchester Road.
17.8	D E Nakhle Investment Trust	Oppose	Noise and vibration effects	The apartments are under construction now and any required mitigation for future road noise should be installed at the same time.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed, including conditions that require management plans to be certified by Council against a sensible purpose.
17.9	D E Nakhle Investment Trust	Oppose	Landscape and visual effects	The designation and associated works will remove features of the approved resource consent for two four level apartment blocks at 164-166 Porchester Road, Takanini. There is no mechanism proposed to address the resultant non-compliance with the approved land use consents.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.

17.10	D E Nakhle Investment Trust	Oppose	Urban design effects	The is insufficient information to manage privacy and screening for units from the works occurring directly adjacent to outdoor living spaces.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.11	D E Nakhle Investment Trust	Oppose	Traffic and transport effects	The submitter is concerned with uncertainty and inconsistency in design responses. NoR 4 provides design responses that differ to those in NoR 2. NoR 2 proposes a 2-lane cross section with central median that ties into the existing roundabout; whereas NoR 4 provides signalisation of the Porchester Road / Walters Road intersection. The resource consent for apartment blocks at 164-166 Porchester Road is based on a road cross section consistent with NoR 2.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.12	D E Nakhle Investment Trust	Oppose	Property and land use effects	Each management plan should be required to achieve a clear objective and Council should retain a role of certifying that the objective has been achieved in accordance with the approach long-approved by the Environment Court.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.13	D E Nakhle Investment Trust	Oppose	Urban design effects	The LUIP only addresses the timeframe between confirmation of the designation and the start of construction. The proposed apartment building at 164-166 Porchester Road is under construction now.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.

17.14	D E Nakhle Investment Trust	Oppose	Property and land use effects	Condition 7 Outline Plans enables a Requiring Authority to pick and choose which management plans are relevant to each 'stage' and to determine what forms each 'stage'.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.15	D E Nakhle Investment Trust	Oppose	Social Impacts	The SCEMP does not include any resolution process for where concerns of the landowner are not being adequately addressed by the outline plan / management plans.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.16	D E Nakhle Investment Trust	Oppose	Urban Design effects; Landscape and visual effects	The ULDMP should be utilised as a tool for refinement and implementation of a design which is already of a standard that will achieve quality urban design and landscape outcomes, as opposed to a tool to fix the current concept plan.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.17	D E Nakhle Investment Trust	Oppose	Urban Design effects; Landscape and visual effects	There is no obligation in the ULDMP condition for stakeholder participation to continue through the detailed design or to participate in earlier designs (e.g enabling works) which ultimately affect decisions and outcomes in the ULDMP.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.18	D E Nakhle Investment Trust	Oppose	Urban Design effects; Landscape and visual effects	The ULDMP should also include an independent process for resolution of any disagreement in the design outcomes or achievement of the objective outcomes.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
17.19	D E Nakhle Investment Trust	Oppose	Flooding effects	The project should not enable any increase in flood hazard on any sites.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.

17.20	D E Nakhle Investment Trust	Oppose	Traffic and transport effects	The Management Plans should be required to maintain vehicle and pedestrian access to any business at all times during the work.	The submitter seeks that the NoR is recommended to be withdrawn. In the alternative, the submitter seeks conditions to ensure each of the issues raised in the submission are addressed.
18.1	Simon and Julie Fleming	Oppose	Submission period	The submitter is concerned with the lack of consultation and short time frame for submitting a submission.	Seeks more consultation and remedies to the submitter's concerns.
18.2	Simon and Julie Fleming	Oppose	Noise and vibration effects; Social Impacts	The submitter is concerned with increase in noise, dust, emissions, health effects, construction noise, vibrations to house, property damage, damage to fencing, working hours during construction. Affecting peoples homes causing distress.	Seeks remedies to their concerns and that the submitter's property at 3 Sheriff Place not be devalued or damaged and their quality of life not be affected.
18.3	Simon and Julie Fleming	Oppose	Flooding effects	The submitter is concerned with increased potential for flooding affecting property stormwater drain.	Seeks remedies to their concerns and that the submitter's property at 3 Sheriff Place not be devalued or damaged and their quality of life not be affected.
18.4	Simon and Julie Fleming	Oppose	Traffic and transport effects	The submitter is concerned with access to property and crossing Porchester Road with increased traffic from Popes Road roundabout.	Seeks remedies to their concerns and that the submitter's property at 3 Sheriff Place not be devalued or damaged and their quality of life not be affected.
19.1	Pritesh Singh	Oppose	Traffic and transport effects	The submitter says bus lanes and cycle lanes are not needed in South Auckland. There is no traffic on Alfriston Road, therefore buses can operate on the same lane as other vehicles.	Does not seek any recommendations.

20.1	Mimico Properties Limited	Oppose	Traffic and transport effects	The submitter's concerns are that there is a lack of sufficient consideration of the impact of the alignment on future industrial development within 90 Takanini School Road and surrounding area; there is a lack of sufficient consideration of the health and safety impacts of the alignment in the context of industrial traffic movements; and other effects and reasons which will be elaborated on at the hearing.	Seeks that the NOR be declined.
21.1	Danielle Evans	Oppose	Traffic and transport effects	The submitter is concerned about access to 311 Porchester Road	Seeks more details around the duration of the project and assurance about how the property will be left.
21.2	Danielle Evans	Oppose	Property and land use effects	The submitter is concerned with almost 5,500m <sup>2</sup> of road frontage of their property at 311 Porchester Road being inside the proposed designation boundary, including half of the only yards and impacting on functionality of the property. The submitter has been told most of this area will only be leased for the duration of the work and has concerns around the duration of the work and how the land will be left at completion, as it will be difficult to return to productive pasture.	Seeks more details around the duration of the project and assurance about how the property will be left.

21.3	Danielle Evans	Oppose	Flooding effects	The submitter is concerned the proposed stormwater pipe will stop at the boundary of their property at 311 Porchester Road, Takanini, changing course and moving to a surface flow conveyance along the existing road front with the fill batter, raising a concern about surface flooding.	Seeks that the underground storm water pipe continue on the same path, rather than change line and become an open drain.
22.1	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Positive effects	The submitter supports the provision of providing transport choices and encouraging mode shift to sustainable transport modes as the population of South Auckland continues to grow through the South FTN. The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.	The submitter broadly supports the project's aim to plan transport investment, improve active mode facilities, and the provision of transport infrastructure that will provide safe access to the current and future wider school network.
22.2	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Lapse period; Social Impacts	A lapse date of 15 years is a significant period when impacting land owned by others. This lapse date should be reduced to a maximum of 5-10 years.	The lapse date should be reduced to a maximum of 5-10 years.
22.3	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	There is potential for existing schools, or any future schools developed in this area to be affected by traffic, noise and other nuisance effects from future construction work. The submitter seeks to ensure that appropriate conditions are included in the designations to mitigate any adverse effects with the construction of the South FTN.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.



22.4	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Other	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs. The submitter supports the terms used in the NoR: Educational facility; stakeholder.	The submitter seeks that acronyms and terms used in the NoRs are consistent with those agreed through other Te Tupu Ngatahi NoRs.
22.5	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Traffic and transport effects	Condition 19 requires the preparation of a Construction Traffic Management Plan (CTMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.	The submitter supports the inclusion of proposed condition 19 Construction Traffic Management Plan, but requests that specific reference is made to education facilities to address the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours (for example on roads servicing educational facilities during pick up and drop off times) to manage vehicular and pedestrian traffic near educational facilities or to manage traffic congestion.

22.6	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Noise and vibration effects	Condition 22 and 23 requires the preparation of a Construction Noise Vibration Management Plan (CNVMP) prior to the start of construction. The submitter supports the inclusion of this condition but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.	The submitter supports the inclusion of proposed conditions 22 and 23 Construction Noise Vibration Management Plan, but requests that specific reference is made to educational facilities to ensure they are taken into consideration as part of the development of this plan as a key stakeholder.
22.7	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Urban design effects	The submitter supports the establishment of Stakeholder Communication and Engagement Management Plan (SCEMP) (condition 9). However, the submitter considers that they are a key stakeholder in this Project, and specific engagement is required to manage construction effects on the schools.	Seeks amendments to conditions to ensure consistency with the changes made to the Te Tupu Ngātahi Warkworth NoR conditions as included in the Strategic Planning & Conditions Rebuttal Evidence prior to the Council hearing. This includes the requirement that at least 6 months prior to construction, the requiring authority shall identify a list of stakeholders, properties, and identify methods to engage with stakeholders and submit this record with any Outline Plan of Works for the relevant stage of work.
22.8	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Property and land use effects	The NoR impacts the entire frontage of the submitter's designation, Papakura Normal School. No consultation with the submitter has taken place and the reasons for the extent of land required is not clear. The school site is space constrained and taking land will limit options for growth in the future.	Seeks amendments to address the extent of the designation into Papakura Normal School.

22.9	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Traffic and transport effects	The designation places restrictions over all existing pedestrian and vehicle access points to Papakura Normal School and removes carparks located outside the school on Walters Road.	Seeks amendments to address the extent of the designation into Papakura Normal School.
22.10	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Urban design effects	The Land Use Integration process in proposed condition 3 does not commence until 12 months after the designation is confirmed, and there is no clear process for the submitter to engage with the requiring authority. A nominated contact should be appointed immediately once the designation is confirmed.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.
22.11	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Urban Design effects; Landscape and visual effects	Proposed condition 12 Urban and Landscape Design Management Plan (condition 12) does not include any requirement to take into account feedback or input from stakeholders.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.
22.12	Te Tāhuhu o te Mātauranga Ministry of Education	Neutral	Traffic and transport effects	Proposed condition 15 Existing Property Access is supported, but there is no mechanism for any points of disagreement to access arrangements to be noted during the Outline Plan process.	Amend the LIP, ULDMP, Existing Property Access, CNVMP, CTMP conditions to ensure effects of the NoRs on the submitter are appropriately managed.
23.1	Watercare Services Limited	Neutral	Network Utility Operations	Some of the NoRs interact with the submitters existing water and wastewater assets. Some of the project areas for the NoRs are within areas where the submitter has planned for future infrastructure development.	The submitter seeks to ensure that any decisions made on the NoRs respond to the issues in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services now and in the future.

23.2	Watercare Services Limited	Neutral	Network Utility Operations	The submitter plans to replace its Takanini 2 Watermain, which runs along Airfield Road. This new watermain and infrastructure will likely intersect with the proposed designation at the Porchester Road/Airfield Road roundabout.	The submitter seeks early engagement from the requiring authority for future planning and construction works including prior to detailed design and during implementation of construction works. For the submitter this includes applying for, in a timely manner, 'Works Over' Approvals, in compliance with the submitter's 'Water Supply and Wastewater Network Bylaw 2015 (Updated 2021).
23.3	Watercare Services Limited	Neutral	Network Utility Operations	The NoRs interact with existing water and wastewater services.	The submitter seeks to ensure the NoRs do not impact its wastewater and water services in the NoR project areas now and into the future, that it has access 24/7 for maintenance, safety and efficient operation of its services and that it is consulted on any works that may impact the submitter's services.

23.4	Watercare Services Limited	Neutral	Network Utility Operations	<p>The submitter supports the intention of proposed conditions which seek to ensure that there is early engagement with relevant stakeholders during the development of the four NoRs (i.e. the conditions which require a Network Utility Management Plan, Stakeholders Communication and Engagement Management Plan and the Land Use Integration Process) but considers amendments are required so that the conditions adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.</p>	<p>The submitter seeks a new condition requiring the preparation of a '<u>Network Utility Strategic Outcomes Plan</u>' (NUSOP): (a) A NUSOP shall be prepared in the project feasibility stage or as early as practicable. (b) The objective of the NUSOP is to set out a strategic framework for asset resilience that includes consideration of growth, corridor protection, and asset renewals over time. (c) The NUSOP shall: i. consider expected asset life of existing assets; ii. consider expected asset capacity increases or changes; and iii. Demonstrate how city and national strategic plans are considered. (d) The NUSOP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project, including Watercare. (e) The NUSOP shall describe how strategic plans from the Network Utility Operators in relation to its assets have been addressed. (f) Any comments received from the Network Utility Operator shall be considered when finalising the NUSOP. (g) Any amendments to the NUSOP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.</p>
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23.5	Watercare Services Limited	Neutral	Network Utility Operations	<p>The submitter seeks amendments to conditions so that they adequately provide for engagement with network utilities, in particular during the feasibility and detailed design stage.</p>	<p>If the amendment sought in submission 29.4 is not included, the submitter seeks amendment to the NUMP condition: (a) A NUMP shall be prepared <u>after consultation with Network Utility Operator(s) including during the feasibility and detailed design phases, and</u> prior to the lodgement of an Outline Plan of Works for a stage of construction <del>Start of Construction for a Stage of Work</del>....(c) the NUMP shall be prepared in consultation....and shall include any s.177 consents required for works affecting prior Designations and Watercare 'Works Over Approvals'. (h) The Requiring Authority shall consult with Network Utility Operators during the feasibility and detailed design phases to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power, water services and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.</p>
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23.6	Watercare Services Limited	Neutral	Network Utility Operations	The submitter seeks to ensure that the decisions made on the NoRs responds to the issues raised in the submission and avoid, remedies or mitigates potential adverse effects on the submitter's ability to provide water and wastewater services.	The submitter seeks amendments to the conditions to ensure any adverse effects on its assets and operations are avoided, remedied or mitigated and to address concerns set out in the submission.
24.1	Kāinga Ora Homes and Communities	Support in part	Positive effects	The submitter supports the outcomes to be derived from the Project.	Supports the NoR in part subject to the relief sought and matters raised in the submission being addressed.
24.2	Kāinga Ora Homes and Communities	Support in part	Social Impacts	The submitter generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.	Generally supports the proposed conditions and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community.
24.3	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Further information is required in relation to bus priority measures including dedicated bus lanes and priority at intersections.	The requiring authority amend the general arrangement drawings to show the dedicated bus lanes and demonstrates how the proposed bus lanes are integrated into the proposed designations including through intersections.
24.4	Kāinga Ora Homes and Communities	Support in part	Lapse period; Social Impacts	Further information is required in relation to reducing the lapse period from 15 to 10 years. The submitter seeks a lapse period of 10 years to encourage the project to be auctioned with more urgency and in an integrated manner.	Amend Condition 5 Lapse from 15 years to 10 years to provide greater certainty and for the project to benefit communities sooner.

24.5	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Further information is required in relation to operational noise and vibration best practical option for PPFs identification and assessment; mitigation at source to within 55 dB $L_{aeq(24h)}$ ; low noise road surface to be implemented on all roads within the designation and building modification for all PPFs to 40dB $L_{Aeq(24h)}$ inside buildings.	The operational noise levels for this project shall not exceed 55 dB $L_{aeq(23h)}$ beyond the boundaries of the designation or, where exceeded at a sensitive receiver, mitigation is provided.
24.6	Kāinga Ora Homes and Communities	Support in part	Part 2 RMA	Amendments to the designation conditions and/or the design of the Project are sought to address the concerns of the submitter.	In the absence of the relief sought in the submission the submitter considers that the NoR is contrary to sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 RMA; and will impact on the ability of people and communities to provide for their social, economic and cultural wellbeing.
24.7	Kāinga Ora Homes and Communities	Support in part	Traffic and transport effects	Integration with existing sections of bus lanes along the proposed FTN corridors should be demonstrated, including whether the designation has covered sufficient spatial extent to accommodate dedicated bus provision at approaches to major intersections.	The extent of the bus lanes are shown on the drawings to cater for buses and a more integrated, efficient and higher-capacity public transport network.



24.8	Kāinga Ora Homes and Communities	Support in part	Urban design effects; traffic and transport effects	Condition 12 (Urban and Landscape Design Management Plan) should be amended to provide for buses and a more integrated, efficient and higher-capacity public transport network.	Amend Condition 12 Urban and Landscape Design Management Plan to provide for buses and a more integrated, efficient and higher-capacity public transport network and amend 12(g): "The ULDMP(s) shall include: (iii)...(f) Integration of passenger transport <u>including the provision of dedicated bus lanes and demonstrating that direct bus services can occur through major intersections.</u>
24.9	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter's tenants often have complex needs and are highly sensitive to noise, vibration and disruption and operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants. WHO guidelines (cited in the submission) identify adverse health effects of road traffic.	A condition requiring operational noise levels to not exceed 55 dB $L_{aeq(24h)}$ beyond the boundaries of the designation or where exceeded at a sensitive receiver, mitigation is provided.

24.10	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Condition 25 (Low Noise Road Surface) is amended to require the use of low noise and vibration road surfaces for all road surfaces in the designation unless further information confirms this is not warranted from a health and safety perspective.
24.11	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Where mitigation is applicable to PPFs the offer for mitigation shall be extended as per its recommended conditions in Appendix A.
24.12	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The proposed conditions freeze the receiving environment to what exists currently, ignores the future receiving environment.	The proposed conditions should be revised to require a BPO assessment prior to construction in the future that recognises the receiving environment as it exists at the time.
24.13	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	In addition to road surface, barrier and Category C mitigation, further mitigation is needed to some non-Category C PPFs in order to mitigate potential adverse health effects.	Amend conditions 29-31 (Operational Conditions) as per Appendix A of the submission to address Best Practical Option (BPO) for PPFs identification and assessment; low noise road surface to be implemented on all roads within the designation; and building modification mitigation for all PPFs to 40 dB $L_{Aeq(24h)}$ inside buildings.

24.14	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 29 Low Noise Road Surface: (b) Any future resurfacing works of the Project shall be undertaken in accordance with the <u>BPO as determined in accordance with these conditions and Auckland Transport Reseal Guidelines...and asphaltic concrete surfacing (or equivalent low road surface) shall be implemented where: (i) <del>The volume of traffic exceeds 10,000 vehicles per day;</del> or (ii) <u>The road is located within the designation; or</u></u>
24.15	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 31 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (time of lodging the OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
24.16	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 32 by adding: <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>

24.17	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 33: ...adopting the Best Practicable Option <del>in accordance with NZS 6806 prior to implementation.</del> <u>A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of OPW), and revision of the Schedule 4 PPFs and their classifications, to include future planned PPFs.</u>
24.18	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	Amend condition 34: The Detailed Mitigation Options shall be implemented...within twelve months of completion of construction, <u>subject to confirmation that during this 12 month period road traffic noise will remain compliant with the noise categories adopted for the NoRs and subject to confirmation that this approach is therefore the BPO, and that there are no other viable options that would permit the low road noise surface to be installed on opening.</u>

24.19	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	Operational noise and vibration needs careful consideration to ensure that the effects are appropriately avoided, remedied or mitigated in accordance with s.16 and s.17 RMA. The submitter is concerned the assessment of traffic noise effects under NZS6806 does not fully capture the potential health effects of the proposal on its land and its tenants.	<p>Amend condition 35: Prior to the Start of Construction, a Suitably Qualified Person shall identify those dwellings which, following implementation of all the Detailed Mitigation Options, <del>will not be Noise Criteria Categories A or B and where</del> <u>would still require Building-Modification Mitigation</u> <del>might be required</del> to achieve 40 dB L<sub>Aeq(24h)</sub> inside Habitable Spaces (<del>'Category C Buildings'</del>). For those PPFs, following the process set out in Conditions 36 to 41, it shall be determined which <u>Building-Modification Mitigation is required to achieve 40 dB LAeq(24h) inside habitable spaces. A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting time (lodging of OPW), and revision of the Schedule 2 PPFs and their classifications, to include future planned PPFs. Any future residential or other PPFs provided for in the AUP:OP zonings shall have a BPO assessment undertaken, including mitigation measures within the Project design where practicable.</u></p>
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24.20	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	<p>The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.</p>	<p>Construction in the vicinity of each <del>Category C</del> Building <u>requiring building-modification mitigation</u>, the Requiring Authority shall write to the owner of the <del>Category C</del> Building..If the building owner agrees to entry within <del>six three</del> months...building envelope. <u>If after 6 months following the date of the requiring authority's letter, no response has been received, the Requiring Authority shall again write to the owner of the Building requesting entry to assess the noise reduction performance of the existing building envelope. If the building owner agrees to entry within six months of the date of the Requiring Authority's letter, the Requiring Authority shall instruct a Suitably Qualified and Experienced Person to visit the building and assess the noise reduction performance of the existing building envelope. A new BPO assessment shall be undertaken to determine the BPO for the environment that is present prior to construction starting (time of lodging of the OPW) , and revision of the Schedule 2 PPFs and their classifications, to include future planned PPFs. Any future residential or other PPFs provided for in the AUP:OP zonings shall have a BPO assessment undertaken, including</u></p>
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24.21	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 37: For each <del>Category C</del> Building <u>requiring Building-Modification Mitigation</u> identified, the Requiring Authority is deemed to have complied with Condition 36 above if...(c ) The building owner did not agree to entry within <del>six</del> <u>three</u> months of the date of the Requiring Authority's <u>last</u> letter.... If any of (b) to (d) above apply to a <del>Category C</del> Building, the Requiring Authority is not required to implement Building-Modification Mitigation to that building.
24.22	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 38: Subject to Condition 37 above,....write to the owner of each <del>Category C</del> Building <u>requiring Building-Modification Mitigation</u> advising:... <u>(b) The options available, at the cost of the Requiring Authority, for Building-Modification Mitigation...</u> (c ) That the owner has <u>24</u> <del>three</del> months <u>from completion of construction of the relevant section of the project</u> to decide whether to accept...more than one option is available.
24.23	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 39: Once an agreement on Building-Modification Mitigation is reached between the Requiring Authority and the owner of a <del>Category C</del> Building <u>requiring Building-Modification Mitigation</u> , the mitigation shall be implemented <u>at the Requiring Authority's expense</u> ,....

24.24	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend condition 40: (c) The building owner did not accept the Requiring Authority's offer to implement Building-Modification Mitigation <u>within 24 months of completion of construction of the relevant section of the Project; three months of the date of the Requiring Authority's letter sent in accordance with Condition 37 (including where the owner did not respond within that period);</u> or (d) The building owner cannot, after reasonable enquiry, be found <u>within 24 months of the prior to completion of construction of the Project.</u>
24.25	Kāinga Ora Homes and Communities	Support in part	Noise and vibration effects	The submitter seeks that where mitigation is applicable for PPFs, that the offer for mitigation shall be extended as per recommended conditions in Appendix A of the submission. This is in the interests of natural justice in terms of giving sufficient time to consider and respond to the offer and mitigating adverse health effects for future occupiers.	Amend Condition 41: The Detailed Mitigation Options shall be maintained <u>by the Requiring Authority</u> so they retain their noise reduction performance as far as practicable.
25.1	Manpreet Kaur	Oppose	Property and land use effects	The submitter is concerned with the proposed designation taking almost 20% of their property at 33 Walters Road, Takanini and make it impossible to carry out any development works. This will result in severe economic disadvantage.	Either abandon the designation or purchase the entire property at 33 Walters Road, Takanini and compensate the submitter accordingly.



**ATTACHMENT FIVE**

**RECOMMENDED AMENDMENTS TO THE  
PROPOSED CONDITIONS**



**Recommended Amendments to Proposed Conditions South FTN NoRs  
12 March 2024 (s.42A Report)**

Notes:

1. Additions to the Proposed Conditions are shown as bold underlined font, and deletions are shown as struck through.
2. Schedules that have no recommended amendments are not shown in full.
3. Amendments necessary to the numbering of conditions and cross-references to condition numbers are included.
4. Numbering referred to in the s.42A report is as used in the Proposed Conditions as lodged.

**NOTICES OF REQUIREMENT FOR THE SOUTH FREQUENT TRANSIT NETWORK  
PROJECT (NoRs 1 to 4)**

**Abbreviations and definitions**

Acronym/Term	Definition
Activity sensitive to noise	Any dwelling, visitor accommodation, boarding house, marae, papakāinga, integrated residential development, retirement village, supported residential care, care centre, lecture theatre in a tertiary education facility, classroom in an education facility and healthcare facility with an overnight stay facility.
AUP	Auckland Unitary Plan.
BPO or Best Practicable Option	Has the same meaning as in section 2 of the RMA 1991.
CEMP	Construction Environmental Management Plan
Certification of material changes to management plans, <b><u>SCEMPs</u></b> , and CNVMP Schedules	Confirmation from the Manager that a material change to a plan, <b><u>SCEMP</u></b> , or CNVMP Schedule has been prepared in accordance with the condition to which it relates.  A material change to a management plan, <b><u>SCEMP</u></b> or CNVMP Schedule shall be deemed certified:  (a) where the Requiring Authority has received written confirmation from Council that the material change to the management plan <b><u>or SCEMP</u></b> is certified;  (b) ten working days from the submission of the material change to the management plan <b><u>or SCEMP</u></b> where no written confirmation of certification has been received; or  (c) five working days from the submission of the material change to a CNVMP Schedule where no written confirmation of certification has been received.
<b><u>Certification of Detour Capacity Assessment Plan and Property Management Strategy</u></b>	<b><u>Confirmation from the Manager that a Detour Capacity Assessment Plan or Property Management Schedule has been prepared in accordance with the condition to which it relates.</u></b> <b><u>A Detour Capacity Assessment Plan or Property Management Strategy shall be deemed certified:</u></b>  <b><u>(a) where the Requiring Authority has received written confirmation from Council that the Detour Capacity Assessment Plan or Property Management Strategy is certified;</u></b>

Acronym/Term	Definition
	<u>or</u> <b>(b) ten working days from the submission of the Detour Capacity Assessment Plan or Property Management Strategy where no written confirmation of certification has been received.</b>
CNVMP	Construction Noise and Vibration Management Plan
CNVMP Schedule or Schedule	A schedule to the CNVMP
Completion of Construction	When construction of the Project (or part of the Project) is complete and it is available for use.
Confirmed Lizard Management Plan Areas	Areas recorded in the Identified Native Lizard Habitat Areas Schedule where the ecological values and effects have been confirmed through the ecological survey under Condition 25.
Construction Works	Activities undertaken to construct the Project excluding Enabling Works
Council	Auckland Council
CTMP	Construction Traffic Management Plan
Developer	Any legal entity that intends to master plan or develop land adjacent to the designation
Development Agency	Public entities involved in development projects
EIANZ Guidelines	Ecological Impact Assessment: EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems, second edition, dated May 2018.
Enabling works	Includes, but is not limited to, the following and similar activities: <ul style="list-style-type: none"> <li>(a) geotechnical investigations (including trial embankments)</li> <li>(b) archaeological site investigations</li> <li>(c) formation of access for geotechnical investigations</li> <li>(d) establishment of site yards, site entrances and fencing</li> <li>(e) constructing and sealing site access roads</li> <li>(f) demolition or removal of buildings and structures</li> <li>(g) relocation of services</li> <li>(h) establishment of mitigation measures (such as erosion and sediment control measures, temporary noise walls, earth bunds and planting)</li> </ul>
HHMP	Historic Heritage Management Plan
HNZPT	Heritage New Zealand Pouhere Taonga.
HNZPTA	Heritage New Zealand Pouhere Taonga Act 2014
Identified Native Lizard Habitat Area	Means an area or areas of features of ecological value where the Project ecologist has identified that the project will potentially have a moderate or greater level of ecological effect on native lizards, prior to implementation of impact management measures, as determined in accordance with the EIANZ guidelines.
LMP	Lizard Management Plan
Manager	The Manager – Resource Consents of the Auckland Council, or authorised delegate.
Mana Whenua	Mana Whenua as referred to in the conditions are considered to be the following (in no particular order), who at the time of Notice of Requirement expressed a desire to be involved in the Project: <ul style="list-style-type: none"> <li>• Te Ākitai Waiohū;</li> </ul>

Acronym/Term	Definition
	<ul style="list-style-type: none"> <li>• Ngai Tai ki Tāmaki</li> <li>• Ngaati Te Ata Waiohua;</li> <li>• Ngaati Whanaunga;</li> <li>• Ngāti Tamaoho;</li> <li>• Ngāti Paoa Trust Board;</li> <li>• Te Ahiwaru Waiohua;</li> <li>• Ngāti Tamaterā;</li> <li>• Ngāti Maru;</li> </ul> <p>Note: other iwi not identified above may have an interest in the Project and should be consulted</p>
Network Utility Operator	Has the same meaning as set out in section 166 of the RMA.
NUMP	Network Utilities Management Plan
NOR	Notice of Requirement
NZAA	New Zealand Archaeological Association
OSMP	Open Space Management Plan
Outline Plan	An outline plan prepared in accordance with section 176A of the RMA.
Project Liaison Person	The person or persons appointed for the duration of the Project's Construction Works to be the main point of contact for persons wanting information about the Project or affected by the Construction Works.
Protected Premises and Facilities (PPF)	Protected Premises and Facilities as defined in New Zealand Standard NZS 6806:2010: <i>Acoustics – Road-traffic noise – New and altered roads</i> .
Requiring Authority	Has the same meaning as section 166 of the RMA and, for this Designation is Auckland Transport.
RMA	Resource Management Act (1991)
SCEMP	Stakeholder Communication and Engagement Management Plan
Stage of Work	Any physical works that require the development of an Outline Plan.
Start of Construction	The time when Construction Works (excluding Enabling Works) start.
Suitably Qualified Person	A person (or persons) who can provide sufficient evidence to demonstrate their suitability, experience and competence in the relevant field of expertise.
ULDMP	Urban and Landscape Design Management Plan

NoR No.	No.	Condition
<b>General Conditions</b>		
NoRs 1,2,3 and 4	1.	<p><b>Activity in General Accordance with Plans and Information</b></p> <p>(a) Except as provided for in the conditions below, and subject to final design and Outline Plan(s), works within the designation shall be undertaken in general accordance with the following in Schedule 1:</p> <ul style="list-style-type: none"> <li>(i) the Project Description; and</li> <li>(ii) Concept Plans.</li> </ul> <p>(b) Where there is inconsistency between:</p> <ul style="list-style-type: none"> <li>(i) the Project Description and Concept Plans in condition 1(a) above and the requirements of the following conditions, the conditions shall prevail;</li> <li>(ii) the Project Description and Concept Plans in condition 1(a) above and the management plans under the conditions of the designation, the requirements of the management plans shall prevail.</li> </ul>
NoRs 1,2,3 and 4	2.	<p><b>Project Information</b></p> <p>(a) A project website, or equivalent virtual information source, shall be established <b>by the requiring authority</b> within 12 months of the date on which this designation is included in the AUP. All directly affected <b>and adjacent</b> owners and occupiers shall be notified in writing once the website or equivalent information source has been established.</p> <p><b><u>(b) The requiring authority shall publicise the location of the website or equivalent virtual information source throughout the community using a variety of media sources and languages, at least on an annual basis throughout the project until completion.</u></b></p> <p><b><u>(c) The requiring authority shall be responsible for the maintenance and updating of the website or virtual information source, ensuring that information remains current and accurate throughout the duration of the project.</u></b></p> <p><b><u>(d)</u></b> The project website or virtual information source shall include these conditions and shall provide information on:</p> <ul style="list-style-type: none"> <li>(i) the status of the Project;</li> <li>(ii) anticipated construction timeframes;</li> <li>(iii) contact details for enquiries;</li> <li>(iv) the implications of the designation for landowners, occupiers, and business owners and operators within the designation, and where they can receive additional <b>advice support</b>;</li> <li>(v) a subscription service to enable receipt of project updates by email; and</li> <li>(vi) when and how to apply for consent for works in the designation under s176(1)(b) of the RMA.</li> </ul> <p><b><u>(e)</u></b> <del>(b)</del> At the start of detailed design for a Stage of Work, the project website or virtual information source shall be updated to provide information on the likely date for Start of Construction, and any staging of works.</p> <p><b><u>(f) The website or virtual information source shall be updated to provide a copy of all SCEMPs, and in accordance with Condition 9 all Management Plans, as they are finalised for a Stage of Works.</u></b></p> <p><b><u>(g) The website or virtual information source shall remain active for a minimum of five years following project completion, or until all major project activities have concluded, whichever is later, to provide ongoing access to project information and updates.</u></b></p>
NoRs 1,2,3 and 4	3.	<p><b>Land Use Integration Process</b></p> <p>The Requiring Authority shall set up a Land use Integration Process for the period between confirmation of the designation and the Start of Construction. The purpose of this process is</p>

NoR No.	No.	Condition
		<p>to encourage and facilitate the integration of master planning and land use development activity on land directly affected or adjacent to the designation. To achieve this purpose:</p> <p>(a) Within <del>twelve (12)</del> <b>six (6)</b> months of the date on which this designation is included in the AUP, the Requiring Authority shall include the contact details of a nominated contact on the project website (or equivalent information source) required to be established by Condition (2)(a)(iii).</p> <p>(b) The nominated contact shall be the main point of contact for a Developer or Development Agency wanting to work with the Requiring Authority to integrate their development plans or master planning with the designation.</p> <p>(c) At any time prior to the Start of Construction, the nominated contact will be available to engage with a Developer or Development Agency for the purpose of:</p> <p>(i) responding to requests made to the Requiring Authority for information regarding design details that could assist with land use integration; and</p> <p>(ii) receiving information from a Developer or Development Agency regarding master planning or land development details that could assist with land use integration.</p> <p>(d) Information requested or provided under Condition 3(c) above may include but not be limited to the following matters:</p> <p>(i) design details including but not limited to:</p> <p>A. boundary treatment (e.g. the use of retaining walls or batter slopes);</p> <p>B. the horizontal and vertical alignment of the road (levels);</p> <p>C. potential locations for mid-block crossings;</p> <p>D. integration of stormwater infrastructure <b><u>and/or flood hazard management</u></b>; and</p> <p>E. how to access traffic noise modelling contours to inform adjacent development.</p> <p>(ii) a process for the Requiring Authority to undertake a technical review of or provide comments on any master planning or development proposal advanced by the Developer or Development Agency as it relates to integration with the Project;</p> <p>(iii) details of how to apply for written consent from the Requiring Authority for any development proposal that relates to land is within the designation under section 176(1)(b) of the RMA; and</p> <p>(e) Where information is requested from the Requiring Authority and is available, the nominated contact shall provide the information unless there are reasonable grounds for not providing it.</p> <p>(f) The nominated contact shall maintain a record of the engagement between the Requiring Authority and Developers and Development Agencies for the period following the date in which this designation is included in the AUP through to the Start of Construction for a Stage of Work. The record shall include:</p> <p>(i) details of any requests made to the Requiring Authority that could influence detailed design, the results of any engagement and, where such requests that could influence detailed design are declined, the reasons why the requiring authority has declined the requests; and</p> <p>(ii) details of any requests to co-ordinate the forward work programme, where appropriate, with Development Agencies and Network Utility Operators.</p> <p>(g) The record shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work</p>
NoRs 1,2,3	4.	<p><b>Designation Review</b></p> <p>(a) The Requiring Authority shall within 6 months of Completion of Construction or as soon</p>

NoR No.	No.	Condition
<b>and 4</b>		<p>as otherwise practicable:</p> <ul style="list-style-type: none"> <li>(i) review the extent of the designation to identify any areas of designated land that it no longer requires for the on-going operation, maintenance or mitigation of effects of the Project; and</li> <li>(ii) give notice to Auckland Council in accordance with section 182 of the RMA for the removal of those parts of the designation identified above-, <b><u>within one month of identification.</u></b></li> </ul>
<b>NoR 1, NoR 3, NoR 4</b>	<b>5.</b>	<p><b>Lapse</b></p> <p>(a) In accordance with section 184(1)(c) of the RMA, this designation shall lapse if not given effect to within 15 years from the date on which it is included in the AUP.</p>
<b>NoR 2</b>	<b>5.</b>	<p><b>Lapse</b></p> <p>(a) In accordance with section 184(1)(c) of the RMA, this designation shall lapse if not given effect to within 10 years from the date on which it is included in the AUP.</p>
<b>NoRs 1,2,3 and 4</b>	<b>6.</b>	<p><b>Network Utility Operators (Section 176 Approval)</b></p> <p>(a) Prior to the start of Construction Works, Network Utility Operators with existing infrastructure located within the designation will not require written consent under section 176 of the RMA for the following activities:</p> <ul style="list-style-type: none"> <li>(i) operation, maintenance and urgent repair works;</li> <li>(ii) minor renewal works to existing network utilities necessary for the on-going provision or security of supply of network utility operations;</li> <li>(iii) minor works such as new service connections; and</li> <li>(iv) the upgrade and replacement of existing network utilities in the same location with the same or similar effects as the existing utility.</li> </ul> <p>To the extent that a record of written approval is required for the activities listed above, this condition shall constitute written approval.</p>
<b>NoRs 1, 2, 3 and 4</b>	<b>7.</b>	<p><b>Property Management Strategy (PMS)</b></p> <p><b><u>(a) The Requiring Authority shall prepare and submit to Council for Certification a Property Management Strategy (PMS) within 12 months of the date on which this designation is included in the AUP;</u></b></p> <p><b><u>(b) The purpose of the PMS is to provide a framework for the interim management of the properties acquired for the South FTN, to ensure they do not deteriorate and adversely affect adjoining properties and the surrounding area. The Strategy shall identify measures and methods to ensure the properties are managed in a manner that:</u></b></p> <ul style="list-style-type: none"> <li><b><u>(i) Does not significantly change the character, intensity and scale of the effects of the existing use of the land;</u></b></li> <li><b><u>(ii) Maintains the condition of the property at that which existed at the time of purchase by the Requiring Authority;</u></b></li> <li><b><u>(iii) Contributes to the functioning of the area within which the property is located;</u></b></li> <li><b><u>(iv) Maintains occupancy as far as reasonably practicable; and</u></b></li> <li><b><u>(v) Provides confidence to occupants, adjoining property owners, and the community that the properties are managed responsibly pending construction;</u></b></li> </ul> <p><b><u>(c) Within 40 working days of receiving written notice of Certification of the PMS by Council, the Requiring Authority shall make the PMS available on the Project Information website or equivalent that is required under Condition 2.</u></b></p>



NoR No.	No.	Condition
<b>Pre-construction Conditions</b>		
NoRs 1,2,3 and 4	<u>7-8.</u>	<p><b>Outline Plan</b></p> <p>(a) An Outline Plan (or Plans) shall be prepared in accordance with section 176A of the RMA.</p> <p>(b) Outline Plans (or Plan) may be submitted in parts or in stages to address particular activities (e.g. design or construction aspects), or a Stage of Work of the Project.</p> <p>(c) Outline Plans shall include any management plan or plans that are relevant to the management of effects of those activities or Stage of Work, which may include:</p> <ul style="list-style-type: none"> <li>(i) Construction Environmental Management Plan;</li> <li>(ii) Construction Traffic Management Plan;</li> <li>(iii) Construction Noise and Vibration Management Plan;</li> <li>(iv) Urban and Landscape Design Management Plan;</li> <li>(v) Historic Heritage Management Plan;</li> <li>(vi) Ecological Management Plan;</li> <li>(vii) Tree Management Plan;</li> <li>(viii) Network Utilities Management Plan; and</li> <li>(ix) Open Space Management Plan.</li> <li><b><u>(x) Development Response Management Plan</u></b></li> <li><b><u>(xi) Stakeholder Communication and Engagement Plan</u></b></li> </ul>
NoRs 1,2,3 and 4	<u>8- 9.</u>	<p><b>Management Plans</b></p> <p>(a) Any management plan shall:</p> <ul style="list-style-type: none"> <li>(i) Be prepared and implemented in accordance with the relevant management plan condition;</li> <li>(ii) Be prepared by a Suitably Qualified Person(s);</li> <li>(iii) Include sufficient detail relating to the management of effects associated with the relevant activities and/or Stage of Work to which it relates.</li> <li>(iv) Summarise comments received from Mana Whenua and other stakeholders as required by the relevant management plan condition, along with a summary of where comments have: <ul style="list-style-type: none"> <li>a. Been incorporated; and</li> <li>b. Where not incorporated, the reasons why.</li> </ul> </li> <li>(v) Be submitted as part of an Outline Plan pursuant to s176A of the RMA, with the exception of <del>SCEMPs and</del> CNVMP Schedules.</li> <li>(vi) Once finalised, <del>be</del> <b>uploaded to the a Project website or equivalent virtual information source, established in accordance with Condition 2;</b></li> </ul> <p>(b) Any management plan developed in accordance with Condition <del>89</del> may:</p> <ul style="list-style-type: none"> <li>(i) Be submitted in parts or in stages to address particular activities (e.g. design or construction aspects) a Stage of Work of the Project, or to address specific activities authorised by the designation.</li> <li>(ii) Except for material changes, be amended to reflect any changes in design, construction methods or management of effects without further process.</li> <li>(iii) If there is a material change required to a management plan which has been submitted with an Outline Plan, the revised part of the plan shall be submitted to the Council as an update to the Outline Plan or for Certification as soon as practicable following identification of the need for a revision;</li> </ul> <p>(c) Any material changes to the SCEMPs are to be submitted to the Council for <del>information</del></p>

NoR No.	No.	Condition
NoRs 1,2,3 and 4	9- 10.	<p style="text-align: center;"><b><u>certification.</u></b></p> <p><b>Stakeholder Communication and Engagement Management Plan (SCEMP)</b></p> <p>(a) A SCEMP shall be prepared in consultation with stakeholders, community groups and organisations <b><u>prior to the start of the detailed design of a Stage of Work.</u></b></p> <p>(b) The objectives of the SCEMP <del>is</del> <b><u>are</u></b> to:</p> <p>(i) identify how the public and stakeholders (including directly affected and adjacent owners and occupiers of land) will be engaged with prior to and throughout the Construction Works- ; <b><u>and</u></b></p> <p>(ii) <b><u>Develop and maintain relationships with members of the community and stakeholders, including but not limited to directly affected and adjacent landowners and occupants, business associations and community organisations.</u></b></p> <p><b>(c)</b> To achieve the objectives, of the SCEMP:</p> <p>(i) At least <b><u>6 months prior to the start of detailed design for</u></b> <del>18 months prior to any Outline Plan being submitted for Construction of a Stage of Work,</del> the Requiring Authority shall identify:</p> <p>A. The properties whose owners <b><u>and occupiers</u></b> will be engaged with;</p> <p>B. A list of key stakeholders, community groups, organisations and businesses who will be engaged with;</p> <p>C. Methods and timing to engage with landowners and occupiers <del>whose access is</del> <b><u>who are</u></b> directly affected <b><u>by the construction of the Stage of Works to which the SCEMP relates; and</u></b></p> <p><b><u>D. Methods and timing to engage with those key stakeholders, community groups, organisations and businesses listed in accordance with (c)(i)B of this condition.</u></b></p> <p>(ii) The SCEMP shall include:</p> <p>A. Details of <del>(b)(i)A to C;</del> <b><u>(c)(i) A to D;</u></b></p> <p>B. the contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);</p> <p>C. the procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;</p> <p>D. methods for engaging with Mana Whenua, to be developed in consultation with Mana Whenua;</p> <p>E. methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in <del>(b)(i)A and C</del> <b><u>(c)(i) A to D</u></b> above; <del>and</del></p> <p>F. linkages and cross-references to communication and engagement methods set out in other conditions and management plans where relevant;</p> <p><b><u>G. A record of the engagement with the parties identified in (c)(i) A to D above including summaries of feedback, and the requiring authority's response to feedback; and</u></b></p> <p><b><u>H. any outcomes and actions undertaken in response to feedback,</u></b></p>

NoR No.	No.	Condition
		<p style="text-align: center;"><b><u>including changes to the detailed design.</u></b></p> <p><b><u>(d)(e)</u></b> Any SCEMP prepared for a Stage of Work shall be submitted to Council <b><u>as part of an Outline Plan pursuant to s.176 of the RMA for that Stage of Work.</u></b> <del>for information ten working days prior to the Start of Construction for a Stage of Work.</del></p>
<p><b>NoRs 1,2,3 and 4</b></p>	<p><b><u>40-11.</u></b></p>	<p><b>Cultural Advisory Report</b></p> <p>(a) At least six (6) months prior to the start of detailed design for a Stage of Work, Mana Whenua shall be invited to prepare a Cultural Advisory Report for the Project. The objective of the Cultural Advisory Report is to assist in understanding and identifying Ngā Taonga Tuku Iho ('treasures handed down by our ancestors') affected by the Project, to inform their management and protection. To achieve the objective, the Requiring Authority shall invite Mana Whenua to prepare a Cultural Advisory Report that:</p> <ul style="list-style-type: none"> <li>(i) Identifies the cultural sites, landscapes and values that have the potential to be affected by the construction and operation of the Project;</li> <li>(ii) Sets out the desired outcomes for management of potential effects on cultural sites, landscapes and values;</li> <li>(iii) Identifies traditional cultural practices within the area that may be impacted by the Project;</li> <li>(iv) Identifies opportunities for restoration and enhancement of identified cultural sites, landscapes and values within the Project area;</li> <li>(v) Taking into account the outcomes of (i) to (iv) above, identify cultural matters and principles that should be considered in the development of the Urban and Landscape Design Management Plan referred to in Condition <del>42</del> <b>13</b>, Historic Heritage Management Plan referred to in Condition <del>24</del><b>28</b> and the Cultural Monitoring Plan referred to in Condition <del>48</del> <b>21</b>.</li> <li>(vi) Identifies and (if possible) nominates traditional names along the Project alignment. Noting there may be formal statutory processes outside the project required in any decision-making.</li> </ul> <p>(b) The desired outcomes for management of potential effects on cultural sites, landscapes and values identified in the Cultural Advisory Report shall be discussed with Mana Whenua and those outcomes reflected in the relevant management plans where practicable.</p> <p>(c) Conditions <del>40</del><b>11</b>(a) and (b) above will cease to apply if:</p> <ul style="list-style-type: none"> <li>(i) Mana Whenua have been invited to prepare a Cultural Advisory Report by a date at least 6 months prior to start of Construction Works; and</li> <li>(ii) Mana Whenua have not provided a Cultural Advisory Report within six months prior to start of Construction Works.</li> </ul>
<p><b>NoRs 1,2,3 and 4</b></p>	<p><b><u>44-12.</u></b></p>	<p><b>Mana Whenua Kaitiaki Forum</b></p> <p>(a) At least twelve (12) months prior to the start of detailed design for a Stage of Work, the Requiring Authority shall invite Mana Whenua to establish a Mana Whenua Kaitiaki Forum. The objective of the Mana Whenua Kaitiaki Forum is to provide a forum for Mana Whenua to participate as partners in all phases of the Project. To achieve the objective, the Mana Whenua Kaitiaki Forum shall address (as a minimum) the following matters:</p> <ul style="list-style-type: none"> <li>(i) how Mana Whenua will provide input into the design of the Project. For example: <ul style="list-style-type: none"> <li>A. how Mana Whenua values and narrative are incorporated through the form of the Project and associated structures;</li> <li>B. how pou, art, sculptures, mahi toi or any other features located on land within or adjoining the Project will be provided in a manner that represents the Māori history of the area and promotes a distinctiveness or sense of</li> </ul> </li> </ul>

NoR No.	No.	Condition
		<p>place.</p> <ul style="list-style-type: none"> <li>(ii) how Mana Whenua will be engaged in the preparation of management plans and future consenting processes;</li> <li>(iii) how mātauranga Māori and tikanga Māori will be recognised in all phases of the Project;</li> <li>(iv) where opportunities for Mana Whenua to participate in engagement with local communities, business associations, social institutions and community groups will be provided;</li> <li>(v) where opportunities for Mana Whenua to support the physical, mental, social and economic wellbeing for iwi and the local community will be provided through the Project. This could include: <ul style="list-style-type: none"> <li>A. planting supplied through Mana Whenua and community based nurseries;</li> <li>B. local schools being involved in planting; and</li> <li>C. scholarships, cadetships and job creation.</li> </ul> </li> <li>(vi) The Requiring Authority shall provide reasonable resourcing, technical and administrative support for Mana Whenua including organising meetings at a local venue and the taking and dissemination of meeting minutes;</li> <li>(vii) The frequency of meetings shall be agreed between the Requiring Authority and Mana Whenua; and</li> <li>(viii) prior to the Start of Construction, the Requiring Authority shall produce a record of the Mana Whenua Kaitiaki Forum. The record of the Mana Whenua Kaitiaki Forum shall be provided to Mana Whenua and shall include (but not be limited to): <ul style="list-style-type: none"> <li>A. details of how Mana Whenua have participated as partners in the Project;</li> <li>B. details of how the matters set out in (a) will be incorporated into the Project;</li> <li>C. how the objective of the Mana Whenua Kaitiaki Forum has been and will continue to be met; and</li> <li>D. details of how comments from Mana Whenua have been incorporated into the Project and where not incorporated, the reasons why.</li> </ul> </li> </ul> <p>(b) Mana Whenua shall be invited to identify and (if possible) nominate traditional names across the Project such as bridge structures. Noting there may be formal statutory processes outside the project required in any decision making.</p> <p>(c) The Mana Whenua Kaitiaki Forum shall continue to meet for at least six months following Completion of Construction or as agreed with Mana Whenua.</p>
NoRs 1,2,3 and 4	<del>12.</del> <b>13.</b>	<p><b>Urban and Landscape Design Management Plan (ULDMP)</b></p> <ul style="list-style-type: none"> <li>(a) A ULDMP shall be prepared <b>at least six (6) months</b> prior to the <del>Start of Construction</del> <b>start of detailed design</b> for a Stage of Work.</li> <li>(b) The objective of the ULDMP(s) is to: <ul style="list-style-type: none"> <li>(i) Enable integration of the Project's permanent works into the surrounding landscape and urban context; and</li> <li>(ii) Ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to a quality urban environment.</li> </ul> </li> <li>(c) Mana Whenua shall be invited to participate in the development of the ULDMP(s) to provide input into relevant cultural landscape and design matters including how desired outcomes for management of potential effects on cultural sites, landscapes and values identified and discussed in accordance with the Cultural Advisory Report (Condition <del>4011</del>) and/or through the Mana Whenua Kaitiaki Forum (Condition <del>4412</del>) may be reflected in the ULDMP.</li> <li>(d) Key stakeholders identified through Condition <del>9(b)(i) B</del> <b>10(c)(i) B</b> shall be invited to</li> </ul>

NoR No.	No.	Condition
		<p>participate in the development of the ULDMP at least six (6) months prior to the start of detailed design for a Stage of Work.</p> <p>(e) The ULDMP shall be prepared in general accordance with:</p> <ul style="list-style-type: none"> <li>(i) Auckland Transport's Urban Roads and Streets Design Guide;</li> <li>(ii) Waka Kotahi Urban Design Guidelines: Bridging the Gap (2013) or any subsequent updated version;</li> <li>(iii) Waka Kotahi Landscape Guidelines (2013) or any subsequent updated version;</li> <li>(iv) Waka Kotahi P39 Standard Specification for Highway Landscape Treatments (2013) or any subsequent updated version; <del>and</del></li> <li>(v) Auckland's Urban Ngahere (Forest) Strategy or any subsequent updated version;</li> <li><b><u>(vi) Nga Ara O Manurewa   Manurewa Local Paths Plan (2019) or any subsequent updated version;</u></b></li> <li><b><u>(vii) Manurewa Urban Ngahere Action Plan (2022) or any subsequent updated version;</u></b></li> <li><b><u>(viii) Papakura Greenways Local Paths Plan (2016) or any subsequent updated version; and</u></b></li> <li><b><u>(ix) Papakura Urban Ngahere Action Plan (2022) or any subsequent updated version;</u></b></li> </ul> <p>(f) To achieve the objective, the ULDMP(s) shall provide details of how the project:</p> <ul style="list-style-type: none"> <li>(i) Is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), <b><u>community infrastructure</u></b>, natural environment, landscape character, <del>and</del> open space zones <b><u>and any adopted master plans for the locality</u></b>;</li> <li>(ii) Provides appropriate walking and cycling connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections;</li> <li>(iii) Promotes inclusive access (where appropriate); and</li> <li>(iv) Promotes a sense of personal safety by aligning with best practice guidelines, such as: <ul style="list-style-type: none"> <li>a. Crime Prevention Through Environmental Design (CPTED) principles;</li> <li>b. Safety in Design (SID) requirements; and</li> <li>c. Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures.</li> </ul> </li> <li>(v) has responded to matters identified through the Land Use Integration Process (Condition 3)</li> </ul> <p>(g) The ULDMP(s) shall include:</p> <ul style="list-style-type: none"> <li>(i) A concept plan – which depicts the overall landscape and urban design concept, and explain the rationale for the landscape and urban design proposals;</li> <li>(ii) Developed design concepts, including principles for walking and cycling facilities and public transport; and</li> <li>(iii) Landscape and urban design details – that cover the following: <ul style="list-style-type: none"> <li>a. Road design – elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses and existing roads (including slip lanes), benching, spoil disposal sites, median width and treatment, roadside width and treatment;</li> <li>b. Roadside elements – such as lighting, fencing, wayfinding and signage;</li> <li>c. architectural and landscape treatment of all major structures, including</li> </ul> </li> </ul>

NoR No.	No.	Condition
		<p>bridges and retaining walls;</p> <p>d. Architectural and landscape treatment of noise barriers;</p> <p>e. Landscape treatment of permanent stormwater control wetlands and swales;</p> <p>f. Integration of passenger transport <b><u>throughout the network</u></b>;</p> <p>g. Pedestrian and cycle facilities including paths, road crossings and dedicated pedestrian/ cycle bridges or underpasses;</p> <p>h. Historic heritage places with reference to the HHMP (Condition <b><u>2428</u></b>); and</p> <p>i. Re-instatement of construction and site compound areas, driveways, accessways and fences;</p> <p><b><u>j. Interfaces – how the interface and edge treatment with adjoining properties has been treated; and</u></b></p> <p><b><u>k. Reinstatement of and, where practicable, enhancement of parks and open spaces.</u></b></p> <p>(h) The ULDM shall also include the following planting details and maintenance requirements:</p> <p>(i) planting design details including:</p> <p>a. Identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan. Where practicable, mature trees and native vegetation should be retained;</p> <p>b. Street trees, shrubs and ground cover suitable for the location;</p> <p>c. treatment of fill slopes to integrate with adjacent land use, streams, Riparian margins and open space zones;</p> <p>d. planting of stormwater wetlands;</p> <p>e. Identification of vegetation to be retained and any planting requirements under the Tree Management Plan (Condition <b><u>2731</u></b>);</p> <p>f. Integration of any planting requirements required by conditions of any resource consents for the project; and</p> <p>g. Re-instatement planting of construction and site compound areas as appropriate.</p> <p>(ii) A planting programme including the staging of planting in relation to the construction programme which shall, as far as practicable, include provision for planting within each planting season following completion of works in each Stage of Work; and</p> <p>(iii) Detailed specifications relating to the following:</p> <p>a. Weed control and clearance;</p> <p>b. Pest animal management (to support plant establishment);</p> <p>c. Ground preparation (top soiling and decompaction);</p> <p>d. Mulching; and</p> <p>e. Plant sourcing and planting, including hydroseeding and grassing, and use of eco-sourced species.</p> <p><b>Advice Note:</b></p> <p><i>This designation is for the purpose of construction, operation and maintenance of an arterial transport corridor and it is not for the specific purpose of "road widening". Therefore, it is not intended that the front yard definition in the Auckland Unitary Plan which applies a set back from a designation for road widening purposes applies to this designation. A set back is not required to manage effects between the designation boundary and any proposed adjacent sites or lots.</i></p>

NoR No.	No.	Condition
<p><del>NoR 1 and NoR 3</del>  <b>NoR 1, 2, 3 and 4</b></p>	<p><del>13, 14.</del></p>	<p><b>Open Space Management Plan (OSMP)</b></p> <p>(a) An OSMP shall be prepared prior to the Start of Construction for a Stage of Work for the open spaces listed in <i>Schedule 5</i>;</p> <p>(b) Auckland Council Parks shall be invited to participate in the development of the OSMP at least six (6) months prior to the start of detailed design for a Stage of Work.</p> <p>(c) The objective of the OSMP is to minimise as far as practicable adverse effects on the recreation amenity <b>values and functions</b> of the open spaces listed in <i>Schedule 5</i> resulting from the Project, <b>while also seeking opportunities for enhancement where practicable</b>. To achieve the objective, the OSMP shall include details of:</p> <p>(i) how the ongoing operation of and access (including walking and cycling) to those open spaces during construction will be maintained in accordance with the Construction Traffic Management Plan (Condition <del>49</del><b>22</b>), <b>taking into account the existing public accessibility of each space</b>;</p> <p>(ii) opportunities to coordinate the forward work programme for those open spaces where appropriate with Auckland Council Parks;</p> <p>(iii) measures to reasonably maintain <b>or manage</b> the existing level of service <b>and accessibility</b> of the affected open space; and</p> <p>(iv) how comments from Auckland Council Parks have been incorporated in the OSMP, and where comments have not been incorporated, the reasons why.</p>
<p><b>NoRs 1, 2, 3 and 4</b></p>	<p><b>15.</b></p>	<p><b><u>Property Management Strategy (PMS)</u></b></p> <p><b><u>(a) The Requiring Authority shall prepare and submit to Council for Certification a Property Management Strategy (PMS) within 12 months of the date on which this designation is included in the AUP;</u></b></p> <p><b><u>(b) The purpose of the PMS is to provide a framework for the interim management of the properties acquired for the South FTN, to ensure they do not deteriorate and adversely affect adjoining properties and the surrounding area. The Strategy shall identify measures and methods to ensure the properties are managed in a manner that:</u></b></p> <p><b><u>(i) Does not significantly change the character, intensity and scale of the effects of the existing use of the land;</u></b></p> <p><b><u>(ii) Maintains the condition of the property at that which existed at the time of purchase by the Requiring Authority;</u></b></p> <p><b><u>(iii) Contributes to the functioning of the area within which the property is located;</u></b></p> <p><b><u>(iv) Maintains occupancy as far as reasonably practicable; and</u></b></p> <p><b><u>(v) Provides confidence to occupants, adjoining property owners, and the community that the properties are managed responsibly pending construction.</u></b></p> <p><b><u>(c) Within 40 working days of receiving written notice of Certification of the PMS by Council, the Requiring Authority shall make the PMS available on the Project Information website or equivalent that is required under Condition 2.</u></b></p>
<p><b>NoRs 1, 3, 4 and 4</b></p>	<p><b>16.</b></p>	<p><b><u>Development Response Management Plan (DRMP)</u></b></p> <p><b><u>(a) A DRMP shall be prepared 18 months prior to the Start of Construction for a Stage of Work;</u></b></p> <p><b><u>(b) The objectives of the DRMP are to provide a framework to assist businesses</u></b></p>

NoR No.	No.	Condition
		<p><u>affected by the Project to manage the impacts of construction and to maximise the opportunities the Project presents;</u></p> <p><b>(c) <u>To achieve the objectives, the DRMP shall include:</u></b></p> <ul style="list-style-type: none"> <li><b>(i) <u>a list of businesses and community organisations likely to be impacted by the Project;</u></b></li> <li><b>(ii) <u>a list of business associations, key business stakeholder groups and community organisations that have and will be engaged through the development of the DRMP;</u></b></li> <li><b>(iii) <u>details of the methodology to establish the baseline of businesses and community organisations identified in (c)(i) above;</u></b></li> <li><b>(iv) <u>details of measures that will be undertaken to manage the impacts of Construction Works on the identified businesses and community organisations;</u></b></li> <li><b>(v) <u>methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (c)(i) above;</u></b></li> <li><b>(vi) <u>a summary of any proactive assistance provided to impacted businesses;</u></b></li> <li><b>(vii) <u>Measures to achieve positive social outcomes, which may include supply chain opportunities, education, training and employment opportunities including partnerships with local business associations and community organisations, and by working with local organisations repurposing and recycling of demolition materials; and</u></b></li> <li><b>(viii) <u>linkages and cross-references to communication and engagement methods set out in other conditions and management plans (e.g. the SCEMP) where relevant;</u></b></li> </ul> <p><b>(d) <u>Any DRMP prepared for a Stage of Work shall be submitted to Council for certification that the requirements of this condition have been met at least 20 working days prior to the Start of Construction for a Stage of Work.</u></b></p>
<b>Specific Outline Plan Requirements</b>		
NoRs 1,2,3 and 4		<p><b>Flood Hazard</b></p> <p>For the purpose of Condition :</p> <ul style="list-style-type: none"> <li>(a) ARI – means Average Recurrence Interval</li> <li>(b) AEP – means Annual Exceedance Probability</li> <li>(c) Existing authorised habitable floor – means the floor level of any room (floor) in a residential building which is authorised and exists at the time the outline plan is submitted, excluding a laundry, bathroom, toilet or any room used solely as an entrance hall, passageway or garage.</li> <li>(d) Flood prone area – means a potential ponding area that relies on a single culvert for drainage and does not have an overland flow path.</li> <li>(e) Maximum Probable Development – is the design case for consideration of future flows allowing for development within a catchment that takes into account the maximum impervious surface limits of the current zone or if the land is zoned Future Urban in the AUP, the probable level of development arising from zone changes.</li> <li>(f) Pre-Project development – means existing site condition prior to the Project (including existing buildings and roadways).</li> <li>(g) Post-Project development – means site condition after the Project has been</li> </ul>



NoR No.	No.	Condition
		completed (including existing and new buildings and roadways).
NoRs 1,2,3 and 4	14.17.	<p><b>Flood Hazard</b></p> <p>(a) The Project shall be designed to achieve the following flood risk outcomes:</p> <ul style="list-style-type: none"> <li>(i) no increase in flood levels in a 1% AEP event for existing authorised habitable, <b><u>community, commercial and/or industrial</u></b> floors that are already subject to flooding or have a freeboard less than 150mm;</li> <li>(ii) no more than a 10% reduction in freeboard in a 1% AEP event for existing authorised habitable floors with a freeboard over 150mm;</li> <li>(iii) no increase in 1% AEP flood levels for existing authorised community, commercial, industrial and network utility building floors that are already subject to flooding;</li> <li>(iv) no more than a 10% reduction in freeboard in a 1% AEP event for existing authorised community, commercial, industrial and network utility building floors;</li> <li>(v) <b><u>maintain the minimum freeboard requirement as set out in the Auckland Code of Practice for Land Development for Subdivision Chapter 4: Stormwater Version 3.0, January 2022 or any update or replacement of that Code;</u></b></li> <li>(vi) no increase of more than 50mm in flood level in a 1% AEP event on land zoned for urban or future urban development where there is no existing dwelling; and</li> <li>(vii) <b><u>no increase in flood plain extent unless a site-specific flood assessment is provided with the Outline Plan that demonstrates there is no reduction in developable land in an urban zone or the Future Urban Zone;</u></b></li> <li>(viii) <b><u>new overland flow paths shall be diverted away from habitable floors and discharge to a suitable location with no increase in flood levels in a 1% AEP event downstream;</u></b></li> <li>(ix) <b><u>no loss in conveyance capacity or change in alignment of existing overland flow paths, unless provided by other means;</u></b></li> <li>(x) no new flood prone areas; and</li> <li>(xi) no more than a 10% average increase <b><u>detrimental change</u></b> of flood hazard (defined as flow depth times velocity) <b><u>classification</u></b> for main <b><u>vehicle and pedestrian</u></b> access to authorised habitable dwellings existing at time the Outline Plan is submitted. The assessment <b><u>of flood</u></b> hazard shall be undertaken for the <b><u>10% and 1%</u></b> AEP rainfall events.</li> </ul> <p>(b) Compliance with this condition <b><u>(a) above</u></b> shall be demonstrated in the Outline Plan, <b><u>developed in consultation with the Auckland Healthy Waters (or its equivalent)</u></b> which shall include flood modelling of the pre-Project and post-Project 100-year AR1 <b><u>10% and 1% AEP</u></b> flood levels (for Maximum Probable Development land use and including climate change).</p> <p>(c) Where the above outcomes can be achieved through alternative measures outside of the designation such as flood stop banks, flood walls, raising existing authorised habitable floor level and new overland flow paths or varied through agreement with the relevant landowner, the Outline Plan shall include confirmation that any necessary landowner and statutory approvals have been obtained for that work or alternative outcome.</p>
NoRs 1,2,3 and 4	15.18.	<p><b>Existing property access</b></p> <p>Prior to submission of the Outline Plan, consultation shall be undertaken with landowners whose vehicle access to their property will be altered by the project. The Outline Plan shall demonstrate how safe <b><u>and fit for purpose</u></b> reconfigured or alternate access will be provided, unless otherwise agreed with the landowner.</p>

NoR No.	No.	Condition
<b>Construction Conditions</b>		
NoRs 1,2,3 and 4	<u>16-19.</u>	<p><b>Construction Environmental Management Plan (CEMP)</b></p> <p>(a) A CEMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CEMP is to set out the management procedures and construction methods to be undertaken to, avoid, remedy or mitigate any adverse effects associated with Construction Works as far as practicable. To achieve the objective, the CEMP shall include:</p> <ul style="list-style-type: none"> <li>(i) the roles and responsibilities of staff and contractors;</li> <li>(ii) details of the site or project manager and the Project Liaison Person, including their contact details (phone and email address);</li> <li>(iii) the Construction Works programmes and the staging approach, and the proposed hours of work;</li> <li>(iv) details of the proposed construction yards including temporary screening when adjacent to residential areas, locations of refuelling activities and construction lighting;</li> <li>(v) methods for controlling dust and the removal of debris and demolition of construction materials from public roads or places;</li> <li>(vi) methods for providing for the health and safety of the general public;</li> <li>(vii) measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstruction to flood flows, actions to respond to warnings of heavy rain;</li> <li>(viii) procedures for incident management;</li> <li>(ix) procedures for the refuelling and maintenance of plant and equipment to avoid discharges of fuels or lubricants to Watercourses;</li> <li>(x) measures to address the storage of fuels, lubricants, hazardous and/or dangerous materials, along with contingency procedures to address emergency spill response(s) and clean up;</li> <li><b><u>(xi) a Good Neighbour Policy including procedures and guidelines for construction workers on expectations associated with ensuring that the surrounding community (landowners, occupiers, businesses, and social organisations) feel safe and respected;</u></b></li> <li><del>(xii)</del> procedures for responding to complaints about Construction Works; and</li> <li><del>(xiii)</del> methods for amending and updating the CEMP as required.</li> </ul>
NoRs 1,2,3 and 4	<u>17-20.</u>	<p><b>Complaints Register</b></p> <p>(a) At all times during Construction Works, a record of any complaints received about the Construction Works shall be maintained. The record shall include:</p> <ul style="list-style-type: none"> <li>(i) The date, time and nature of the complaint;</li> <li>(ii) The name, phone number and address of the complainant (unless the complainant wishes to remain anonymous);</li> <li>(iii) Measures taken to respond to the complaint (including a record of the response provided to the complainant) or confirmation of no action if deemed appropriate;</li> <li>(iv) The outcome of the investigation into the complaint;</li> <li>(v) Any other activities in the area, unrelated to the Project that may have contributed to the complaint, such as non-project construction, fires, traffic accidents or unusually dusty conditions generally.</li> </ul> <p>(b) A copy of the Complaints Register required by this condition shall be made available</p>

NoR No.	No.	Condition
NoRs 1,2,3 and 4	<del>18</del> -21.	<p>to the Manager upon request as soon as practicable after the request is made.</p> <p><b>Cultural Monitoring Plan</b></p> <p>(a) Prior to the start of Construction Works, a Cultural Monitoring Plan shall be prepared by a Suitably Qualified Person(s) identified in collaboration with Mana Whenua. The objective of the Cultural Monitoring Plan is to identify methods for undertaking cultural monitoring to assist with management of any cultural effects during Construction works. The Cultural Monitoring Plan shall include:</p> <p>(i) Requirements for formal dedication or cultural interpretation to be undertaken prior to start of Construction Works in areas identified as having significance to Mana Whenua;</p> <p>(ii) Requirements and protocols for cultural inductions for contractors and subcontractors;</p> <p>(iii) Identification of activities, sites and areas where cultural monitoring is required during particular Construction Works;</p> <p>(iv) Identification of personnel to undertake cultural monitoring, including any geographic definition of their responsibilities; and</p> <p>(v) Details of personnel to assist with management of any cultural effects identified during cultural monitoring, including implementation of the Accidental Discovery Protocol</p> <p>(b) If Enabling Works involving soil disturbance are undertaken prior to the start of Construction Works, an Enabling Works Cultural Monitoring Plan shall be prepared by a Suitably Qualified Person identified in collaboration with Mana Whenua. This plan may be prepared as a standalone Enabling Works Cultural Monitoring Plan or be included in the main Construction Works Cultural Monitoring Plan.</p> <p><b>Advice Note:</b> Where appropriate, the Cultural Monitoring Plan shall align with the requirements of other conditions of the designation and resource consents for the Project which require monitoring during Construction Works.</p>
NoRs 1,2,3 and 4	<del>19</del> -22.	<p><b>Construction Traffic Management Plan (CTMP)</b></p> <p>(a) A CTMP shall be prepared prior to the Start of Construction for a Stage of Work. The objective of the CTMP is to avoid, remedy or mitigate, as far as practicable, adverse construction traffic effects. To achieve this objective, the CTMP shall include:</p> <p>(i) methods to manage the effects of temporary traffic management activities on traffic;</p> <p>(ii) measures to ensure the safety of all transport users;</p> <p>(iii) the estimated numbers, frequencies, routes and timing of traffic movements, including any specific non-working or non-movement hours to manage vehicular and pedestrian traffic near <b>educational facilities</b> <del>schools</del> or to manage traffic congestion;</p> <p>(iv) site access routes and access points for heavy vehicles, the size and location of parking areas for plant, construction vehicles and the vehicles of workers and visitors;</p> <p>(v) identification of detour routes and other methods to ensure the safe management and maintenance of traffic flows, including <b>public transport services</b>, pedestrians and cyclists;</p> <p>(vi) methods to maintain access to <b>and within</b> property and/or private roads where practicable, or to provide alternative access arrangements when it will not be;</p> <p><b>(vii) methods to maintain, as far as practicable, parking and loading areas within</b></p>

NoR No.	No.	Condition
		<p><b><u>properties:</u></b></p> <p>(viii) the management approach to loads on heavy vehicles, including covering loads of fine material, the use of wheel-wash facilities at site exit points and the timely removal of any material deposited or spilled on public roads;</p> <p><del>(viii)</del>ix) methods that will be undertaken to communicate traffic management measures to affected road users (e.g. residents/public/stakeholders/emergency services);</p> <p><del>(ix)</del> Auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version;</p> <p>(x) details of minimum network performance parameters during the construction phase, including any measures to monitor compliance with the performance parameters; and</p> <p>(xi) details of any measures proposed to be implemented in the event of thresholds identified in <del>(ix)</del> (x) being exceeded.</p> <p><b><u>(b) auditing, monitoring and reporting requirements relating to traffic management activities shall be undertaken in accordance with the New Zealand Guide to Temporary Traffic Management or any subsequent version.</u></b></p>
NoR 1	23.	<p><b><u>Otūwairoa Stream /Slippery Creek Bridge</u></b></p> <p><b><u>(a) A connection across the Otūwairoa Stream/Slippery Creek with sufficient capacity for all vehicles and active modes shall be maintained in both directions at all times, except for:</u></b></p> <p><b><u>(i) Overnight closures between the hours of 8pm and 6am; and</u></b></p> <p><b><u>(ii) Closures between 27 December and 10 January.</u></b></p> <p><b><u>(b) If expanded or new alternate routes providing additional general traffic capacity between Drury and Papakura are operational at the time demolition of the existing Otūwairoa Stream/Slippery Creek bridge is due to commence, the closure periods may be extended subject to the preparation and certification by Council of a Detour Capacity Assessment Plan.</u></b></p> <p><b><u>(c) The objective of the Detour Capacity Assessment Plan required by (b) in this condition is to avoid adverse effects on the safe and efficient operation of the transport network when the Otūwairoa Stream /Slippery Creek bridge is closed. To achieve the objective the Detour Capacity Assessment Plan shall provide:</u></b></p> <p><b><u>(i) proposed bridge closure schedule(s);</u></b></p> <p><b><u>(ii) hourly traffic volumes currently crossing the bridge during the hours of proposed closure(s), including separately counted cyclists, light vehicles and heavy vehicles;</u></b></p> <p><b><u>(iii) hourly traffic volumes using proposed detour routes and likely alternate routes during the hours of proposed closure(s);</u></b></p> <p><b><u>(iv) projected traffic volumes on proposed detour routes and likely alternate routes during bridge closure(s);</u></b></p> <p><b><u>(v) analysis of network efficiency, including modelling of key intersections, and analysis of mid-block locations and level crossings where the hourly volume of any individual movement is projected to increase by five percent or more; with output including projected average delay, and queue lengths</u></b></p>

NoR No.	No.	Condition								
		<p><u>on a per-movement basis;</u></p> <p>(vi) <u>analysis of impacts on road safety arising from increased traffic volumes on detour routes, including for active mode users;</u></p> <p>(vii) <u>details of any measures to address adverse safety or efficiency effects arising from the bridge closure(s); and</u></p> <p>(viii) <u>details of measures to address disruption, diversion, or other changes to public transport services;</u></p> <p>(d) <u>The Detour Capacity Assessment Plan shall be submitted to Council for certification at least 20 working days prior to the commencement of demolition and/or construction work on the bridge; or</u></p> <p>(e) <u>shall form a part of the CTMP that must be submitted to Council as a part of the Outline Plan required under condition 7.</u></p> <p><i><u>Advice Note: Additional general traffic lanes on the Mill Road corridor and/ or a new north-south Opāheke arterial are expected to provide expanded or new alternate routes with additional general traffic capacity.</u></i></p>								
NoR 2	<del>23.</del>	<p><u>Hingaia Stream Bridge</u></p> <p>(a) <u>Works to demolish the Hingaia Stream bridge at Great South Road and construction of a replacement bridge at that location shall not commence until and unless the existing bridge at Norrie Road over the Hingaia Stream has been widened to two lanes to provide for all vehicles and active modes and has been opened.</u></p> <p>(b) <u>Closure of the Hingaia Stream bridge shall be avoided at any time if the Norrie Road bridge has not been widened to two lanes.</u></p> <p>(c) <u>A connection across Hingaia Stream at Great South Road with sufficient capacity for all vehicles and active modes shall be maintained in both directions at all times, except during the following times:</u></p> <p>(i) <u>Overnight closures between the hours of 8pm and 6am; and</u></p> <p>(ii) <u>Closures between 27 December and 10 January.</u></p>								
NoR 3	<del>23.</del>	<p><u>Bridge Reconstruction</u></p> <p>(a) <u>A two-directional connection across the Southern Motorway at Alfriston Road, and a two-directional connection across the North Island Main Trunk railway at Weymouth Road, with sufficient capacity for all vehicles and active modes shall be maintained at all times, except for:</u></p> <p>(i) <u>Overnight closures between the hours of 8pm and 6am; and</u></p> <p>(ii) <u>Closures between 27 December and 10 January.</u></p>								
NoRs 1,2,3 and 4	<del>20.</del> 24.	<p><b>Construction Noise Standards</b></p> <p>(a) Construction noise shall be measured and assessed in accordance with NZS6803:1999 Acoustics – Construction Noise and shall comply with the noise standards set out in the following table as far as practicable:</p> <p><b>Table <del>20-4</del>24.1: Construction noise standards</b></p> <table border="1"> <thead> <tr> <th>Day of week</th> <th>Time period</th> <th>L<sub>Aeq</sub>(15min)</th> <th>L<sub>AFmax</sub></th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Day of week	Time period	L <sub>Aeq</sub> (15min)	L <sub>AFmax</sub>				
Day of week	Time period	L <sub>Aeq</sub> (15min)	L <sub>AFmax</sub>							

NoR No.	No.	Condition																																																		
		<p style="text-align: center;"><b>Occupied activity sensitive to noise</b></p> <table border="1"> <tr> <td rowspan="4">Weekday</td> <td>0630h - 0730h</td> <td>55 dB</td> <td>75 dB</td> </tr> <tr> <td>0730h - 1800h</td> <td>70 dB</td> <td>85 dB</td> </tr> <tr> <td>1800h - 2000h</td> <td>65 dB</td> <td>80 dB</td> </tr> <tr> <td>2000h - 0630h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td rowspan="4">Saturday</td> <td>0630h - 0730h</td> <td>55 dB</td> <td>75 dB</td> </tr> <tr> <td>0730h - 1800h</td> <td>70 dB</td> <td>85 dB</td> </tr> <tr> <td>1800h - 2000h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td>2000h - 0630h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td rowspan="4">Sunday and Public Holidays</td> <td>0630h - 0730h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td>0730h - 1800h</td> <td>55 dB</td> <td>85 dB</td> </tr> <tr> <td>1800h - 2000h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td>2000h - 0630h</td> <td>45 dB</td> <td>75 dB</td> </tr> <tr> <td colspan="4" style="text-align: center;"><b>Other occupied buildings</b></td> </tr> <tr> <td rowspan="2">All</td> <td>0730h – 1800h</td> <td>70 dB</td> <td></td> </tr> <tr> <td>1800h – 0730h</td> <td>75 dB</td> <td></td> </tr> </table> <p>(b) Where compliance with the noise standards set out in Table <del>20-4</del><b>24.1</b> is not practicable, the methodology in Condition <del>23</del> <b>27</b> shall apply.</p>	Weekday	0630h - 0730h	55 dB	75 dB	0730h - 1800h	70 dB	85 dB	1800h - 2000h	65 dB	80 dB	2000h - 0630h	45 dB	75 dB	Saturday	0630h - 0730h	55 dB	75 dB	0730h - 1800h	70 dB	85 dB	1800h - 2000h	45 dB	75 dB	2000h - 0630h	45 dB	75 dB	Sunday and Public Holidays	0630h - 0730h	45 dB	75 dB	0730h - 1800h	55 dB	85 dB	1800h - 2000h	45 dB	75 dB	2000h - 0630h	45 dB	75 dB	<b>Other occupied buildings</b>				All	0730h – 1800h	70 dB		1800h – 0730h	75 dB	
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NoRs 1,2,3 and 4	<del>24-25</del> <b>24-25</b>	<p><b>Construction Vibration Standards</b></p> <p>(a) Construction vibration shall be measured in accordance with <del>ISO 4866:2010 Mechanical vibration and shock—Vibration of fixed structures—Guidelines for the measurement of vibrations and evaluation of their effects on structures</del> <b>DIN4150-3:1999</b> and shall comply with the vibration standards set out in the following table as far as practicable.</p> <p><b>Table <del>24-4</del> <u>25.1</u> Construction vibration criteria</b></p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Details</th> <th>Category A</th> <th>Category B</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Occupied Activities sensitive to noise</td> <td>Night-time 2000h - 0630h</td> <td>0.3mm/s ppv</td> <td><u>1</u> 2mm/s ppv</td> </tr> <tr> <td>Daytime 0630h - 2000h</td> <td>2mm/s ppv</td> <td>5mm/s ppv</td> </tr> <tr> <td>Other occupied buildings</td> <td>Daytime 0630h - 2000h</td> <td>2mm/s ppv</td> <td>5mm/s ppv</td> </tr> <tr> <td>All other buildings</td> <td>At all other times</td> <td colspan="2">Tables 1 and 3 of DIN4150-3:1999</td> </tr> </tbody> </table> <p><i>*Category A criteria adopted from Rule E25.6.30.1 of the AUP</i></p> <p><i>**Category B criteria based on DIN 4150-3:1999 building damage criteria for daytime</i></p> <p>(b) Where compliance with the vibration standards set out in Table <del>24-4</del><b>25.1</b> is not practicable, the methodology in Condition <del>23</del> <b>27</b> shall apply</p>	Receiver	Details	Category A	Category B	Occupied Activities sensitive to noise	Night-time 2000h - 0630h	0.3mm/s ppv	<u>1</u> 2mm/s ppv	Daytime 0630h - 2000h	2mm/s ppv	5mm/s ppv	Other occupied buildings	Daytime 0630h - 2000h	2mm/s ppv	5mm/s ppv	All other buildings	At all other times	Tables 1 and 3 of DIN4150-3:1999																																
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NoRs 1,2,3 and 4	<del>22-26</del> <b>22-26</b>	<p><b>Construction Noise and Vibration Management Plan (CNVMP)</b></p> <p>(a) A CNVMP shall be prepared by a Suitably Qualified and Experienced Person prior to the Start of Construction for a Stage of Work.</p>																																																		

NoR No.	No.	Condition
		<p>(b) A CNVMP shall be implemented during the Stage of Work to which it relates.</p> <p>(c) The objective of the CNVMP is to provide a framework for the development and implementation of the Best Practicable Option for the management of construction noise and vibration effects to achieve the construction noise and vibration standards set out in Conditions <del>20 and 21</del> <b>24 and 25</b> to the extent practicable. To achieve this objective, the CNVMP shall be prepared in accordance with Annex E2 of the New Zealand Standard NZS6803:1999 'Acoustics – Construction Noise' (NZS6803:1999) and shall as a minimum, address the following:</p> <ul style="list-style-type: none"> <li>(i) Description of the works and anticipated equipment/processes;</li> <li>(ii) Hours of operation, including times and days when construction activities would occur;</li> <li>(iii) The construction noise and vibration standards for the project;</li> <li>(iv) Identification of receivers where noise and vibration standards apply;</li> <li>(v) A hierarchy of management and mitigation options, including any requirements to limit night works and works during other sensitive times, including Sundays and public holidays as far practicable;</li> <li>(vi) Methods and frequency for monitoring and reporting on construction noise and vibration;</li> <li>(vii) Procedures for communication and engagement with nearby residents and stakeholders, including notification of proposed construction activities, the period of construction activities, and management of noise and vibration complaints.</li> <li>(viii) Contact details of the Project Liaison Person;</li> <li>(ix) Procedures for the regular training of the operators of construction equipment to minimise noise and vibration as well as expected construction site behaviours for all workers;</li> <li>(x) Procedures and requirements for the preparation of a Schedule to the CNVMP (Schedule) for those areas where compliance with the noise Condition <del>20</del> <b>24</b> and/or vibration standards Condition 21 Category B will not be practicable;</li> <li>(xi) Identification of trigger levels for undertaking building condition surveys, which shall be Category B day time levels;</li> <li>(xii) Procedures and trigger levels for undertaking building condition surveys before and after works to determine whether any cosmetic or structural damage has occurred as a result of construction vibration.</li> <li>(xiii) Methodology and programme of desktop and field audits and inspections to be undertaken to ensure that CNVMP, Schedules and the best practicable option for management of effects are being implemented.</li> <li>(xiv) Requirements for review and update of the CNVMP</li> </ul>
NoRs 1,2,3 and 4	<del>23-27.</del>	<p><b>Schedule to a CNVMP</b></p> <p>(a) A Schedule to the CNVMP (Schedule) shall be prepared prior to the start of the construction to which it relates by a Suitably Qualified Person, in consultation with the owners and occupiers of sites subject to the Schedule, when:</p> <ul style="list-style-type: none"> <li>(i) Construction noise is either predicted or measured to exceed the noise standards in Condition <del>20</del><b>24</b>, except where the exceedance of the <math>L_{Aeq}</math> criteria is no greater than 5 decibels and does not exceed: <ul style="list-style-type: none"> <li>a. 0630 – 2000: 2 period of up to 2 consecutive weeks in any 2 months, or</li> <li>b. 2000 - 0630: 1 period of up to 2 consecutive nights in any 10 days.</li> </ul> </li> <li>(ii) Construction vibration is either predicted or measured to exceed the Category B standard at the receivers in Condition <del>24</del><b>25</b>.</li> </ul> <p>(b) The objective of the Schedule is to set out the Best Practicable Option measures to manage noise and/or vibration effects of the construction activity beyond those measures set out in the CNVMP. The Schedule shall include details such as:</p>

NoR No.	No.	Condition
		<ul style="list-style-type: none"> <li>(i) Construction activity location, start and finish dates;</li> <li>(ii) The nearest neighbours to the construction activity;</li> <li>(iii) The predicted noise and/or vibration level for all receivers where the levels are predicted or measured to exceed the applicable standards and predicted duration of the exceedance;</li> <li>(iv) for works proposed between 2000h and 0630h, the reasons why the proposed works must be undertaken during these hours and why they cannot be practicably undertaken during the daytime;</li> <li>(v) The proposed mitigation options that have been selected, and the options that have been discounted as being impracticable and the reasons why;</li> <li>(vi) The consultation undertaken with owners and occupiers of sites subject to the Schedule, and how consultation has and has not been taken into account; and</li> <li>(vii) Location, times and types of monitoring;</li> </ul> <p>(c) The Schedule shall be submitted to the Manager for certification at least 5 working days (except in unforeseen circumstances) in advance of Construction Works that are covered by the scope of the Schedule and shall form part of the CNVMP.</p> <p>(d) Where material changes are made to a Schedule required by this condition, the Requiring Authority shall consult the owners and/or occupiers of sites subject to the Schedule prior to submitting the amended Schedule to the Manager for certification in accordance with (c) above. The amended Schedule shall document the consultation undertaken with those owners and occupiers, and how consultation outcomes have and have not been taken into account.</p>
NoRs 1,2,3 and 4	<u>24-28.</u>	<p><b>Historic Heritage Management Plan (HHMP)</b></p> <ul style="list-style-type: none"> <li>(a) A HHMP shall be prepared in consultation with Council, HNZPT and Mana Whenua prior to the Start of Construction for a Stage of Work.</li> <li>(b) The objective of the HHMP is to protect historic heritage and to remedy and mitigate any residual effects as far as practicable. To achieve the objective, the HHMP shall identify: <ul style="list-style-type: none"> <li>(i) Any adverse direct and indirect effects on historic heritage sites and measures to appropriately avoid, remedy or mitigate any such effects, including a tabulated summary of these effects and measures;</li> <li>(ii) Methods for the identification and assessment of potential historic heritage places within the Designation to inform detailed design;</li> <li>(iii) Known historic heritage places and potential archaeological sites within the Designation, including identifying any archaeological sites for which an Archaeological Authority under the HNZPTA will be sought or has been granted;</li> <li>(iv) Any unrecorded archaeological sites or post-1900 heritage sites within the Designation, which shall also be documented and recorded;</li> <li>(v) Roles, responsibilities and contact details of Project personnel, Council and HNZPT representatives, Mana Whenua representatives, and relevant agencies involved with heritage and archaeological matters including surveys, monitoring of Construction Works, compliance with AUP accidental discovery rule, and monitoring of conditions;</li> <li>(vi) Specific areas to be investigated, monitored and recorded to the extent these are directly affected by the Project;</li> </ul> </li> </ul>



NoR No.	No.	Condition
		<p>(vii) The proposed methodology for investigating and recording post-1900 historic heritage sites (including buildings) that need to be destroyed, demolished or relocated, including details of their condition, measures to mitigate any adverse effects and timeframe for implementing the proposed methodology, in accordance with the HNZPT Archaeological Guidelines Series No.1: Investigation and Recording of Buildings and Standing Structures (November 2018, or any subsequent version;</p> <p>(viii) Methods to acknowledge cultural values identified through the Mana Whenua Kaitiaki Forum (Condition 44<del>12</del>) and Urban and Landscape Design Management Plan (Condition 42<del>13</del>) where archaeological sites also involve ngā taonga tuku iho (treasures handed down by our ancestors) and where feasible and practicable to do so;</p> <p>(ix) Methods for avoiding, remedying or mitigation adverse effects on historic heritage places and sites within the Designation during Construction Works as far as practicable. These methods shall include, but are not limited to:</p> <ol style="list-style-type: none"> <li>a. security fencing or hoardings around historic heritage places to protect them from damage during construction or unauthorised access;</li> <li>b. measures to mitigate adverse effects on historic heritage sites that achieve positive historic heritage outcomes such as increased public awareness and interpretation signage; and</li> <li>c. Training requirements and inductions for contractors and subcontractors on historic heritage places within the Designation, legal obligations relating to accidental and/or unexpected discoveries, the AUP Accidental Discovery Rule (E11.6.1). The training shall be undertaken prior to the Start of Construction, under the guidance of a Suitably Qualified Person and Mana Whenua representatives (to the extent the training relates to cultural values identified under Condition 48<del>21</del>).</li> </ol> <p>(c) Electronic copies of all historic heritage reports relating to historic heritage investigations (evaluation, excavation and monitoring), shall be submitted to the Manager within 12 months of completion.</p> <p><b>Accidental Discoveries</b>  <b>Advice Note:</b>  <i>The requirements for accidental discoveries of heritage items are set out in Rule E11.6.1 of the AUP</i></p>
NoRs 1,2,3 and 4	<u>25.29.</u>	<p><b><del>Pro-Construction Lizard Survey</del></b></p> <p><del>(a) At the start of detailed design for a Stage of Work, an updated survey of native lizards and their habitat in the locations shown in Schedule 2: Identified Native Lizard Habitat Areas shall be undertaken. The purpose of the survey is to:</del></p> <ol style="list-style-type: none"> <li><del>(i) Confirm whether the native lizards of value within the locations shown in Schedule 2 are still present;</del></li> <li><del>(ii) Confirm whether the project will or may have a moderate or greater level of ecological effect on native lizards of value in these locations, prior to implementation of impact management measures, as determined in accordance with the EIANZ guidelines.</del></li> </ol> <p><del>(b) If the survey confirms the presence of native lizards of value in accordance with condition 25(a)(i) and that effects are likely in accordance with condition 25(a)(ii) then a Lizard Management Plan (or Plans) shall be prepared in accordance with Condition 26 for these areas (Confirmed Lizard Management Plan Areas).</del></p> <p><b><u>Pre-Construction Ecological Survey</u></b></p> <p><b><u>(a) At the start of detailed design for a Stage of Work, an updated ecological survey</u></b></p>

NoR No.	No.	Condition
		<p><u>shall be undertaken within the works footprint by a Suitably Qualified and Experienced Person. The purpose of the survey is to inform detailed design and guide ecological management by identifying if and where indigenous fauna (including Regionally or Nationally At-Risk or Threatened species) are present;</u></p> <p><b>(b) Mana Whenua shall be invited as partners to observe how the ecological survey in (a) will be undertaken;</b></p> <p><b>(c) If the ecological survey confirms the presence of indigenous bats, birds and/or lizards in accordance with Condition 29(a) then an Ecological Management Plan shall be prepared in accordance with Condition 30; and</b></p> <p><b>(d) If the ecological survey in accordance with Condition 29(a) does not confirm the presence of indigenous bats, birds and/or lizards then a report setting out the methodologies and results of the ecological survey shall be provided to Council at the time of the Outline Plan for that Stage of Works.</b></p>
NoRs 1,2,3 and 4	<u>26,30.</u>	<p><b><u>Lizard Management Plan (LMP)</u></b></p> <p>(a) A LMP shall be prepared for any Confirmed Lizard Management Plan Areas (in accordance with Condition 25) prior to the Start of Construction for a Stage of Work. The objective of the LMP is to minimise effects of the Project on native lizards of value in Confirmed Lizard Management Plan Areas as far as practicable. The LMP shall set out the methods that will be used to achieve the objective which may include:</p> <p>(i) A description of the methodology and timing for survey, trapping and relocation of native lizards rescued;</p> <p>(ii) A description of the relocation site(s), including:</p> <p>a. Any measures to ensure the relocation site is suitable protected and remains viable (e.g. covenants, consent notices etc.);</p> <p>b. Any measures to ensure the relocation site is suitably managed to ensure appropriate habitat for native lizards (e.g. provision of additional refugia, weed and pest management); and</p> <p>(iii) Any proposed monitoring of relocation sites if necessary to evaluate translocation success.</p> <p>(b) The LMP shall be consistent with any native lizard management measures to be undertaken in compliance with conditions of any regional resource consents granted for the Project.</p> <p><b><u>Ecological Management Plan (EMP)</u></b></p> <p><b>(a) An EMP shall be prepared for all areas where indigenous fauna are confirmed in accordance with Condition 29 prior to the Start of Construction for a Stage of Work. The objective of the EMP is to minimise adverse effects of the Project on indigenous bats, birds and lizards as far as practicable;</b></p> <p><b>(b) The EMP shall provide a summary of the methodology used and the results of the Ecological Survey;</b></p> <p><b>(c) The EMP shall set out the methods and other details relevant to achieving the objective as follows:</b></p> <p><b><u>(i) if an EMP is required in accordance with Condition 29(c) for the presence of long-tailed bats the following information shall be provided in the EMP:</u></b></p> <p><b><u>A. measures to minimise disturbance from construction activities within the vicinity of any active roosts that are discovered until such roosts are confirmed to be vacant of bats;</u></b></p> <p><b><u>B. how the timing of any construction work in the vicinity of any maternity long tail bat roosts will be limited to outside the bat maternity period (between December and March) where reasonably practicable;</u></b></p> <p><b><u>C. details of areas where vegetation is to be retained where practicable for the purposes of the connectivity of long tailed bats;</u></b></p> <p><b><u>D. details of how bat connectivity will be provided and maintained (e.g. through the presence of suitable indigenous, or exotic trees or artificial</u></b></p>

NoR No.	No.	Condition
		<p><u>alternatives) will be provided and maintained; and</u></p> <p><u>E. where mitigation isn't practicable, details of any offsetting proposed;</u></p> <p><u>(ii) If an EMP is required in accordance with Condition 29(c) for the presence of Threatened or At-Risk birds (excluding Wetland Birds) the following information shall be provided in the EMP:</u></p> <p><u>A. how the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;</u></p> <p><u>B. where works are required within the Confirmed Biodiversity Area during the bird breeding season (including Rail), methods to minimise adverse effects on Threatened or At-Risk birds; and</u></p> <p><u>C. details of grass maintenance if Rail are present;</u></p> <p><u>(iii) If an EMP is required in accordance with Condition 29 for the presence of Threatened or At-Risk wetland birds the following information shall be provided in the EMP:</u></p> <p><u>A. how the timing of any Construction Works shall be undertaken outside of the bird breeding season (September to February) where practicable;</u></p> <p><u>B. where works are required within the Confirmed Biodiversity Area during the bird breeding season, methods to minimise adverse effects on Threatened or At-Risk wetland birds; and</u></p> <p><u>C. undertaking a nesting bird survey of Threatened or At-Risk wetland birds prior to any Construction Works taking place within a 50m radius of any identified Wetlands;</u></p> <p><u>(iv) If an EMP is required in accordance with Condition 25 for the presence of native lizards the following information shall be provided in the EMP:</u></p> <p><u>A. a detailed description of the methodologies and timing for survey, trapping, and relocation of salvaged native lizards;</u></p> <p><u>B. a detailed description of the lizard release site(s);</u></p> <p><u>C. details of measures to ensure the relocation site is suitable protected and remains viable as a long-term habitat (e.g. covenants, consent notices etc.);</u></p> <p><u>D. details of measures to ensure the lizard release site is suitably managed to ensure appropriate habitat for native lizards (e.g. provision of additional refugia, weed and pest management);</u></p> <p><u>E. monitoring of relocation sites if necessary to evaluate translocation success; and</u></p> <p><u>F. the LMP shall be consistent with any native lizard management measures to be undertaken in compliance with conditions of any regional resource consents granted for the Project.</u></p> <p><b>Advice Note:</b></p> <p><i>Depending on the potential effects of the Project, the regional consents for the Project may include the following monitoring and management plans:</i></p> <p>(i) <i>Stream and/or wetland restoration plans;</i></p> <p>(ii) <i>Vegetation restoration plans; and</i></p> <p>(iii) <i>Fauna management plans (eg avifauna, bats).</i></p>
NoRs 1,2,3 and 4	<u>27-31.</u>	<p><b>Tree Management Plan</b></p> <p>(a) Prior to the Start of Construction for a Stage of Work, a Tree Management Plan shall be prepared. The objective of the Tree Management Plan is to avoid, remedy or mitigate effects of construction activities on trees identified in Schedule 3.</p> <p>(b) The Tree Management Plan shall:</p>

NoR No.	No.	Condition
		<ul style="list-style-type: none"> <li>(i) confirm that the trees listed in Schedule 3 still exist; and</li> <li>(ii) demonstrate how the design and location of project works has avoided, remedied or mitigated any effects on any tree listed in Schedule 3. This may include: <ul style="list-style-type: none"> <li>a. planting to replace trees that require removal (with reference to the ULDMP planting design details in Condition <del>42</del><b>13</b>);</li> <li>b. tree protection zones and tree protection measures such as protective fencing, ground protection and physical protection of roots, trunks and branches; and</li> <li>c. methods for work within the rootzone of trees that are to be retained in line with accepted arboricultural standards.</li> </ul> </li> <li>(iii) demonstrate how the tree management measures (outlined in a – c above) are consistent with conditions of any resource consents granted for the project in relation to managing construction effects on trees.</li> </ul>
<b>NoRs 1,2,3 and 4</b>	<b><u>28-32.</u></b>	<p><b>Network Utility Management Plan (NUMP)</b></p> <ul style="list-style-type: none"> <li>(a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.</li> <li>(b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to: <ul style="list-style-type: none"> <li>(i) Provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;</li> <li>(ii) Protect and where necessary, relocate existing network utilities;</li> <li>(iii) Manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area;</li> <li>(iv) Demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical hazards on Metallic Pipelines;</li> </ul> </li> <li>(c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) who have existing assets that are directly affected by the Project <b><u>and shall include any s.177 RMA consents required for works affecting prior designations, and Watercare 'Works Over Approvals'</u></b>.</li> <li>(d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) <b><u>during the further project stages including detailed design</u></b> where practicable.</li> <li>(e) The NUMP shall describe how any comments from the Network Utility Operator in relation to its assets have been addressed.</li> <li>(f) Any comments received from the Network Utility Operator shall be considered when finalising the NUMP.</li> <li>(g) Any amendments to the NUMP related to the assets of a Network Utility Operator shall be prepared in consultation with that asset owner.</li> </ul>
<b>Operational Conditions</b>		
<b>NoRs 1,2,3 and 4</b>	<b><u>29-33.</u></b>	<p><b>Low Noise Road Surface</b></p> <ul style="list-style-type: none"> <li>(a) Asphaltic concrete surfacing (or equivalent low noise road surface) shall be implemented within 12 months of Completion of Construction of the project.</li> <li>(b) <b><u>The road surface shall be designed, implemented and maintained to be smooth and even to avoid adverse vibration generated from traffic passing over uneven surfaces.</u></b></li> <li>(c) <del>(b)</del> Any future resurfacing works of the Project shall be undertaken in accordance with</li> </ul>

NoR No.	No.	Condition
		<p>the Auckland Transport Reseal Guidelines, Asset Management and Systems 2013 and asphaltic concrete surfacing (or equivalent low noise road surface) shall be implemented where:</p> <ul style="list-style-type: none"> <li>(i) The volume of traffic exceeds 10,000 vehicles per day; or</li> <li>(ii) The road is subject to high wear and tear (such as cul de sac heads, roundabouts and main road intersections); or</li> <li>(iii) It is in an industrial or commercial area where there is a high concentration of truck traffic; or</li> <li>(iv) It is subject to high usage by pedestrians, such as town centres, hospitals, shopping centres and schools.</li> </ul> <p>(e) Prior to commencing any future resurfacing works, the Requiring Authority shall advise the Manager if any of the triggers in Condition 29(e)(i) – (iv) are not met by the road or a section of it and therefore where the application of asphaltic concrete surfacing (or equivalent low noise road surface) is no longer required on the road or a section of it. Such advice shall also indicate when any resealing is to occur.</p>
NoRs 1,2,3 and 4		<p><b>Traffic Noise</b></p> <ul style="list-style-type: none"> <li>(a) For the purposes of Conditions 30 to 41 <b>34 to 45</b>;</li> <li>(b) Building-Modification Mitigation – has the same meaning as in NZS 6806;</li> <li>(c) Design year has the same meaning as in NZS 6806;</li> <li>(d) Detailed Mitigation Options – means the fully detailed design of the Selected Mitigation Options, with all practical issues addressed;</li> <li>(e) Habitable Space – has the same meaning as in NZS 6806;</li> <li>(f) Identified Noise Criteria Category – means the Noise Criteria Category for a PPF identified in <i>Schedule 4: Identified PPFs Noise Criteria Categories</i>;</li> <li>(g) Mitigation – has the same meaning as in NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads;</li> <li>(h) Noise Criteria Categories – means the groups of preference for sound levels established in accordance with NZS 6806 when determining the Best Practicable Option for noise mitigation (i.e. Categories A, B and C);</li> <li>(i) NZS 6806 – means New Zealand Standard NZS 6806:2010 Acoustics – Road-traffic noise – New and altered roads;</li> <li>(j) Protected Premises and Facilities (PPFs) – means only the premises and facilities identified in green, orange or red in <i>Schedule 4: PPFs Noise Criteria Categories</i>;</li> <li>(k) Selected Mitigation Options – means the preferred mitigation option resulting from a Best Practicable Option assessment undertaken in accordance with NZS 6806 taking into account any low noise road surface to be implemented in accordance with Condition <b>2933</b>; and</li> <li>(l) Structural Mitigation – has the same meaning as in NZS 6806.</li> </ul> <p><b><u>(m) Notwithstanding the above applying to the PPFs in Schedule 4, conditions 34 to 45 shall be read as also including a requirement for the future BPO assessment to determine the BPO for the environment that is present prior to construction starting (in terms of road surface, barriers, or other source noise mitigation), noting that the Requiring Authority is not responsible for acoustically treating dwellings that are constructed following the lodgement of the NoR on 13 October 2023.</u></b></p>
NoRs 1,2,3 and 4	<del>30-34</del>	<p>The Noise Criteria Categories identified in <i>Schedule 4: PPFs Noise Criteria Categories</i> at each of the PPFs shall be achieved where practicable and subject to Conditions 30 to 41 <b>34 to 45</b> (all traffic noise conditions).</p> <p>The Noise Criteria Categories do not need to be complied with at a PPF where:</p> <ul style="list-style-type: none"> <li>(a) The PPF no longer exists; or</li> </ul>

NoR No.	No.	Condition
		<p>(b) Agreement of the landowner has been obtained confirming that the Noise Criteria Category does not need to be met.</p> <p>Achievement of the Noise Criteria Categories for PPFs shall be by reference to a traffic forecast for a high growth scenario in a design year at least 10 years after the programmed opening of the Project.</p>
NoRs 1,2,3 and 4	<del>34</del> - <del>35</del> .	<p>As part of the detailed design of the Project, a Suitably Qualified Person shall determine the Selected Mitigation Options for the PPFs identified on <i>Schedule 4: PPFs Noise Criteria Categories</i>.</p> <p>For the avoidance of doubt, the low noise road surface implemented in accordance with Condition <del>29</del> <del>33</del> may be (or be part of) the Selected Mitigation Option(s).</p>
NoRs 1,2,3 and 4	<del>32</del> - <del>36</del> .	<p>Prior to construction of the Project, a Suitably Qualified Person shall develop the Detailed Mitigation Options for the PPFs identified in <i>Schedule 4 PPFs Noise Criteria Categories</i>, taking into account the Selected Mitigation Options.</p>
NoRs 1,2,3 and 4	<del>33</del> - <del>37</del> .	<p>If the Detailed Mitigation Options would result in the Identified Noise Criteria Category changing to a less stringent Category, e.g. from Category A to B or Category B to C, at any relevant PPF, a Suitably Qualified Person shall provide confirmation to the Manager that the Detailed Mitigation Option would be consistent with adopting the Best Practicable Option in accordance with NZS 6806 prior to implementation.</p>
NoRs 1,2,3 and 4	<del>34</del> - <del>38</del> .	<p>The Detailed Mitigation Options shall be implemented prior to completion of construction of the Project, with the exception of any low-noise road surfaces, which shall be implemented within twelve months of completion of construction.</p>
NoRs 1,2,3 and 4	<del>35</del> - <del>39</del> .	<p>Prior to the Start of Construction, a Suitably Qualified Person shall identify those PPFs which, following implementation of all the Detailed Mitigation Options, will not be Noise Criteria Categories A or B and where Building-Modification Mitigation might be required to achieve 40 dB <math>L_{Aeq(24h)}</math> inside Habitable Spaces ('Category C Buildings').</p>
NoRs 1,2,3 and 4	<del>36</del> - <del>40</del> .	<p>Prior to the Start of Construction in the vicinity of each Category C Building, the Requiring Authority shall write to the owner of the Category C Building requesting entry to assess the noise reduction performance of the existing building envelope. If the building owner agrees to entry within three months of the date of the Requiring Authority's letter, the Requiring Authority shall instruct a Suitably Qualified Person to visit the building and assess the noise reduction performance of the existing building envelope.</p>
NoRs 1,2,3 and 4	<del>37</del> - <del>41</del> .	<p>For each Category C Building identified, the Requiring Authority is deemed to have complied with Condition <del>36</del> <del>40</del> above if:</p> <ul style="list-style-type: none"> <li>(a) The Requiring Authority's Suitably Qualified Person has visited the building and assessed the noise reduction performance of the building envelope; or</li> <li>(b) The building owner agreed to entry, but the Requiring Authority could not gain entry for some reason (such as entry denied by a tenant); or</li> <li>(c) The building owner did not agree to entry within three months of the date of the Requiring Authority's letter sent in accordance with Condition <del>36</del> <del>40</del> above (including where the owner did not respond within that period); or</li> <li>(d) The building owner cannot, after reasonable enquiry, be found prior to completion of construction of the Project.</li> </ul> <p>If any of (b) to (d) above apply to a Category C Building, the Requiring Authority is not required to implement Building-Modification Mitigation to that building.</p>
NoRs 1,2,3 and 4	<del>38</del> - <del>42</del> .	<p>Subject to Condition <del>37</del> <del>41</del> above, within six months of the assessment undertaken in accordance with Conditions <del>36</del> <del>40</del> and <del>37</del> <del>41</del>, the Requiring Authority shall write to the owner of each Category C Building advising:</p> <ul style="list-style-type: none"> <li>(a) If Building-Modification Mitigation is required to achieve 40 dB <math>L_{Aeq(24h)}</math> inside habitable spaces; and</li> </ul>

NoR No.	No.	Condition
		<p>(b) The options available for Building-Modification Mitigation to the building, if required; and</p> <p>(c) That the owner has three months to decide whether to accept Building-Modification Mitigation to the building and to advise which option for Building-Modification Mitigation the owner prefers, if the Requiring Authority has advised that more than one option is available.</p>
<b>NoRs 1,2,3 and 4</b>	<b><u>39-43.</u></b>	Once an agreement on Building-Modification Mitigation is reached between the Requiring Authority and the owner of a Category C Building, the mitigation shall be implemented, including any third party authorisations required, in a reasonable and practical timeframe agreed between the Requiring Authority and the owner.
<b>NoRs 1,2,3 and 4</b>	<b><u>40-44.</u></b>	<p>Subject to Condition <u>3741</u>, where Building-Modification Mitigation is required, the Requiring Authority is deemed to have complied with Condition <u>39 43</u> if:</p> <p>(a) The Requiring Authority has completed Building Modification Mitigation to the building; or</p> <p>(b) An alternative agreement for mitigation is reached between the Requiring Authority and the building owner; or</p> <p>(c) The building owner did not accept the Requiring Authority's offer to implement Building-Modification Mitigation within three months of the date of the Requiring Authority's letter sent in accordance with Condition <u>3741</u> (including where the owner did not respond within that period); or</p> <p>(d) The building owner cannot, after reasonable enquiry, be found prior to completion of construction of the Project.</p>
<b>NoRs 1,2,3 and 4</b>	<b><u>44-45.</u></b>	The Detailed Mitigation Options shall be maintained so they retain their noise reduction performance as far as practicable

**Schedule 1: General accordance plans and information**

**NoR 1**

The proposed work is for the construction, operation, maintenance of upgrades to Great South Road between Manukau and Drury. The proposed work is shown in the following Concept Plans and includes:

- a) Upgrades to Great South Road to accommodate bus priority measures, general traffic lanes, and walking and cycling facilities in eight locations;
- b) Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;
- c) Reconfiguration of local roads, where the proposed work intersects with local roads; and
- d) Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways.

**Concept Plans:**

...



**NoR 2**

The proposed work is for the construction, operation, and maintenance of upgrades to Great South Road between Waihoehoe Road and the State Highway 1 Drury Interchange. The proposed work is shown in the following Concept Plan and includes:

- a) An upgrade of Great South Road to accommodate general traffic lanes and walking and cycling facilities;
- b) Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;
- c) Reconfiguration of local roads, where the proposed work intersects with local roads; and
- d) Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways.

Concept Plan:

...

**NoR 3**

The proposed work is for the construction, operation, and maintenance of upgrades to Weymouth and Alfriston Roads between Selwyn Road and Saralee Drive; and to Great South Road between Halver Road and Myers Road. The proposed work is shown in the following Concept Plan and includes:

- a) Upgrades to Weymouth Road, Alfriston Road, and Great South Road accommodate bus priority measures, general traffic lanes and walking and cycling facilities;
- b) Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;
- c) Reconfiguration of local roads, where the proposed work intersects with local roads; and
- d) Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways.

**Concept Plan:**

...

**NoR 4**

The proposed work is for the construction, operation, and maintenance of upgrades to Porchester Road between Alfriston Road and Walters Road; and to Popes Road between Takanini School Road and east of Porchester Road. The proposed work is shown in the following Concept Plans and includes:

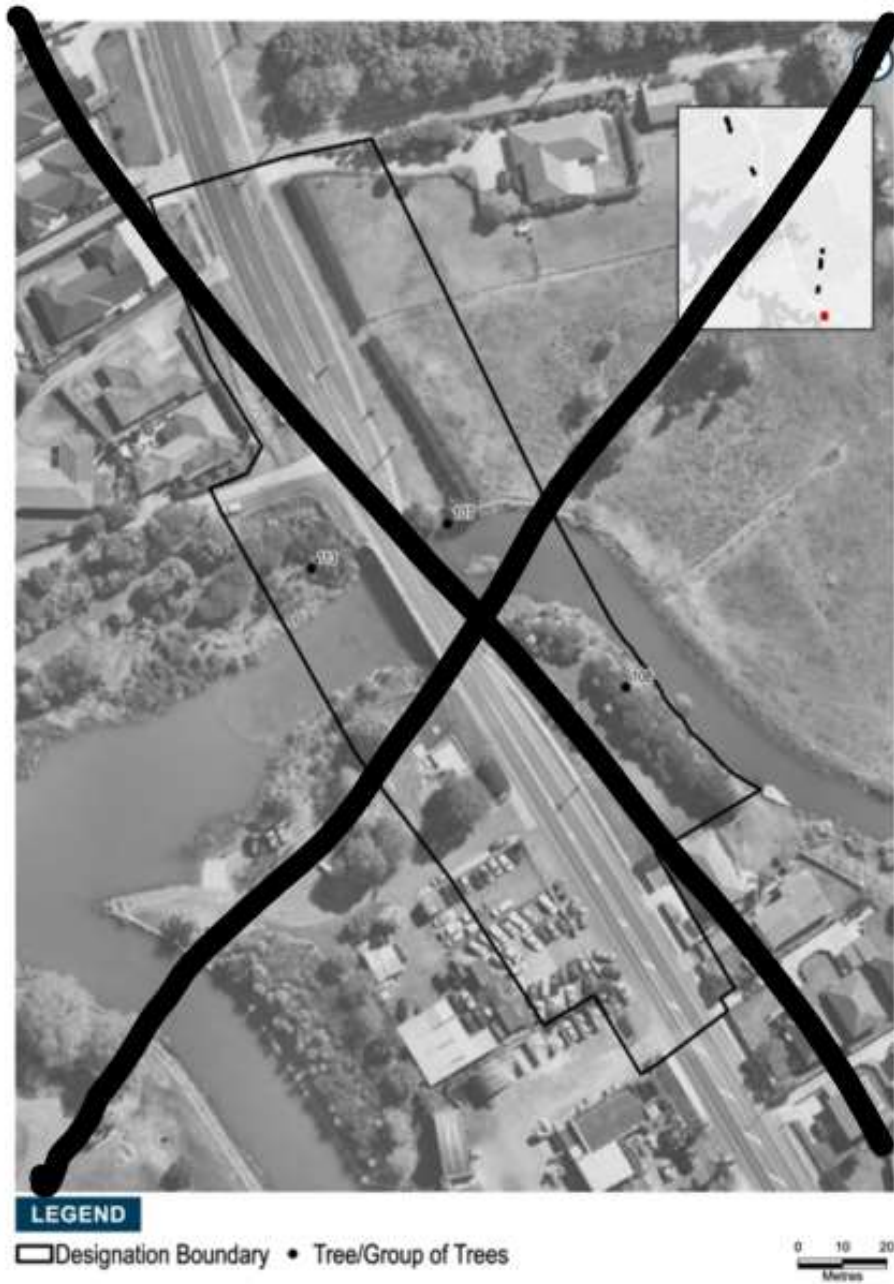
- a) Upgrades of Porchester Road and Popes Road to accommodate general traffic lanes and walking and cycling facilities;
- b) Associated works including intersections, bridges, embankments, retaining walls, culverts, and stormwater management systems;
- c) Reconfiguration of local roads, where the proposed work intersects with local roads; and
- d) Construction activities including vegetation removal, establishment of construction areas and the regrading of driveways.

**Concept Plans:**

...

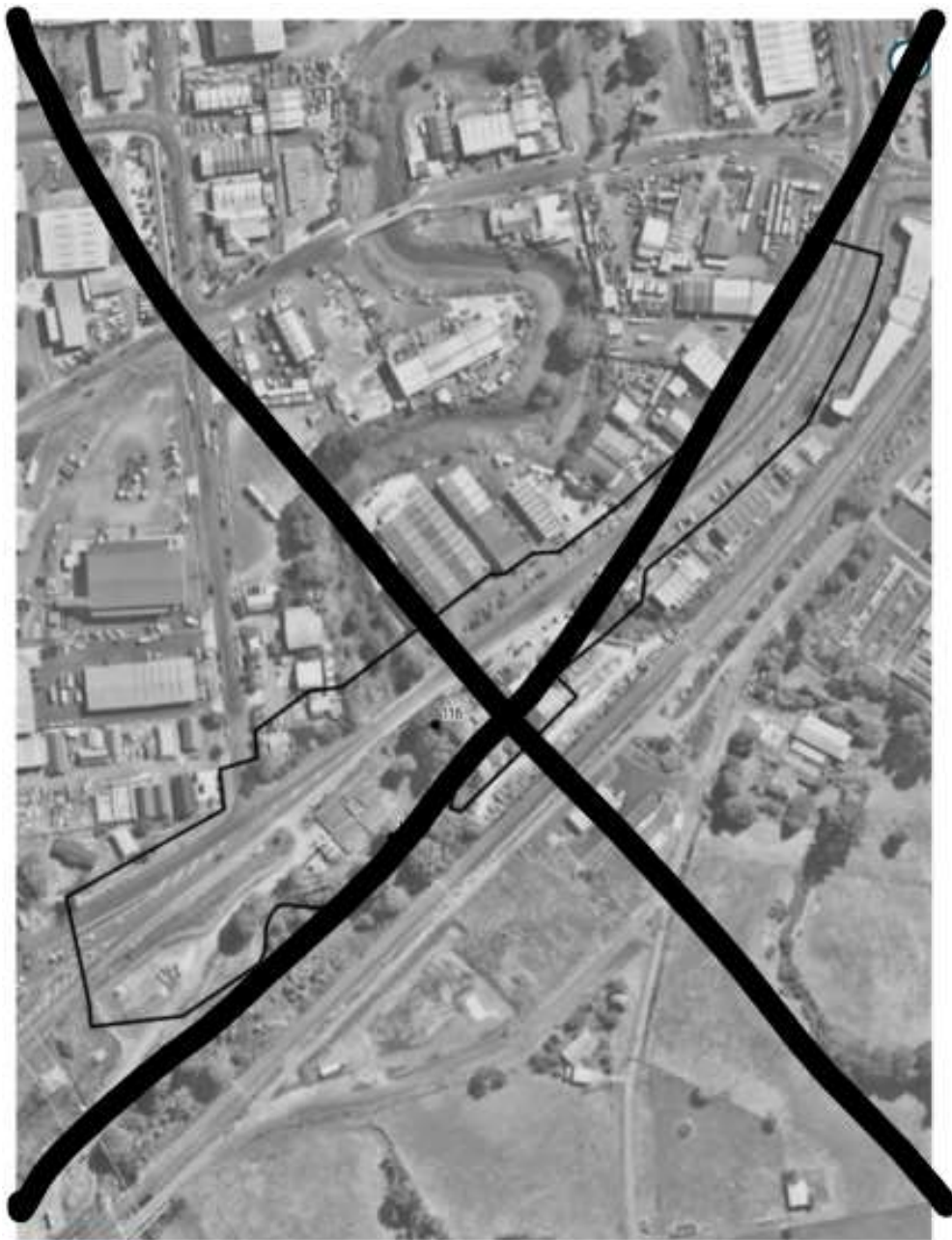
**Schedule 2: Identified Native Lizard Habitat Areas****NoR-1****Pre-construction native lizard survey area**

Tree No.	Vegetation Type	Tree Species
107	Group of Trees	Ake Ake, Karo
108	Group of Trees	Putaputawētā, Karamu, Tī Kōuka, Kahikatea, Kānuka, Mānuka, Karo, Kowhai
113	Group of Trees	Tī Kōuka, Mānuka



**NoR-2****Pre-construction native lizard survey locations**

Tree No.	Vegetation Type	Species
415	Group of Trees	Willow
416	Group of Trees	Willow



**LEGEND**

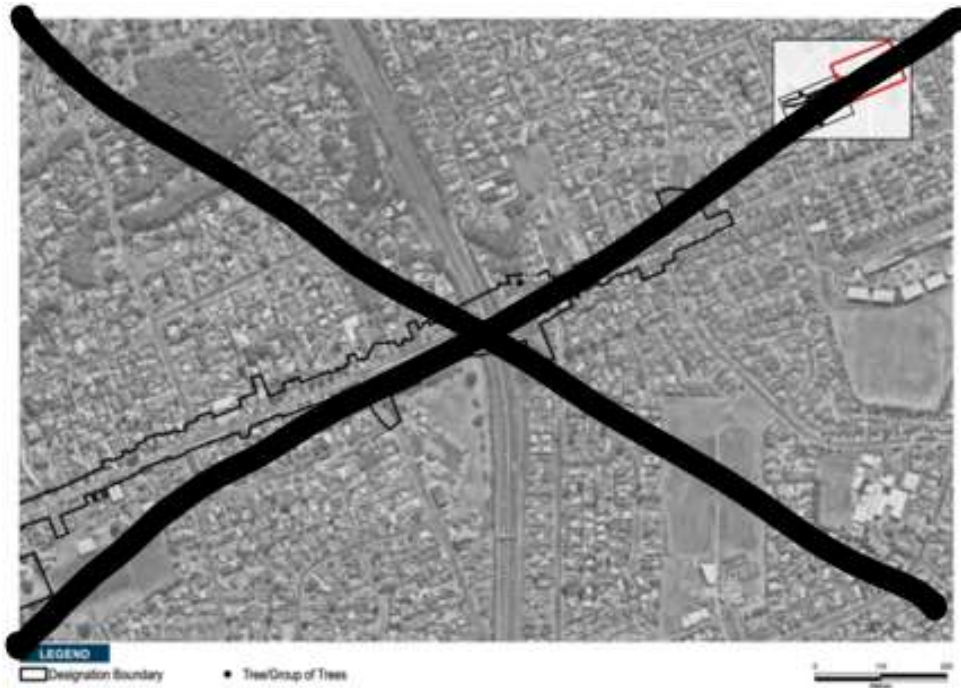
□ Designation Boundary • Tree/Group of Trees



**NoR-3**

**Pre-construction native lizard survey locations**

Tree No.	Vegetation Type	Species
38	Group of Trees	Karamu, Māpou
39	Group of Trees	Karamu, Gum
41	Group of Trees	Karamu, English Oak
48	Group of Trees	Tī Kōuka





**Schedule 3: Trees to be included in the Tree Management Plan**

...

(no recommended amendments)

**Schedule 4: Identified PPFs noise criteria categories**

...

(no recommended amendments, subject to Requiring Authority confirming Schedule 4 is complete)

## Schedule 5: Open spaces to be included in the Open Space Management Plan

NoR 1

<b>Open Space Name</b>	<b>Address</b>	<b>Legal description</b>
Anderson Park	58R Great South Road Manurewa Auckland 2102	Lot 8 DP 12984
<b><u>Central Park</u></b>	<b><u>57R Wood Street, Papakura</u></b>	<b><u>ALLOT 205 SEC 11 VILLAGE PAPAURA</u></b>
<b><u>Central Park Cenotaph</u></b>	<b><u>278 Great South Road, Papakura</u></b>	<b><u>ALLOT 115 SEC 11 Village PAPAURA</u></b>
<b><u>Chisholm Corner</u></b>	<b><u>312 Great South Road, Papakura</u></b>	<b><u>Lot 3 DP 148082</u></b>
<b><u>Slippery Creek Reserve</u></b>	<b><u>Road Reserve</u></b>	<b><u>Road Reserve</u></b>

NoR 2

No open spaces to be included

<b><u>Open Space Name</u></b>	<b><u>Address</u></b>	<b><u>Legal description</u></b>
<b><u>Karaka Reserve</u></b>	<b><u>10R Karaka Road, Drury</u></b>	<b><u>SEC 1 SO 65144</u></b>
<b><u>Hingaia Stream Esplanade Reserve</u></b>	<b><u>279 Great South Road, Drury</u></b>	<b><u>LOT 4 DP 46314</u></b> <b><u>LOT 5 DP 46314</u></b>

NoR 3

<b>Open Space Name</b>	<b>Address</b>	<b>Legal description</b>
Tadmire Park	238R Great South Road Manurewa Auckland 2102	LOT 2 DP 49948, LOT 3 DP 49948
Gallaher Park	21R Alfriston Road Manurewa Auckland 2102	LOT 4 DP 46314, LOT 5 DP 46314
Alfriston Park	26R Saralee Drive Manurewa Auckland 2105	LOT 76 DP 203181

Open Space Name	Address	Legal description
<u>Index Place Reserve</u>	<u>92R Alfriston Road, Manurewa</u>	<u>LOT 53 DP 349979</u>

NoR 4

No open spaces to be included

Open Space Name	Address	Legal description
<u>Addison Reserve</u>	<u>21 Airfield Road</u>	<u>LOT 1029 DP 516537</u>

# **ATTACHMENT SIX**

## **EXAMPLES OF CONDITIONS FOR DEVELOPMENT RESPONSE MANAGEMENT PLANS**



Attachment 6

**Examples of Conditions for Development Response Management Plans in Notices of Requirement**

**Example 1: Form 18 Notice of Requirement for Designation, Auckland Transport, Airport to Botany – Rongomai Park Bus Rapid Transit Corridor (9 December 2022)**

Development Response Management Plan (DRMP)

- (a) A DRMP shall be prepared 18 months prior to the Start of Construction for a Stage of Work. The objective of the DRMP is to provide a framework to assist businesses affected by the Project to manage the impacts of construction and to maximise the opportunities the Project presents. To achieve the objective, the DRMP shall include:
- (i) a list of businesses likely to be impacted by the Project;
  - (ii) a list of business associations and key business stakeholder groups that have and will be engaged through the development of the DRMP;
  - (iii) details of the methodology to establish the baseline of businesses identified in (i);
  - (iv) recommendations for measures to be undertaken to manage the impacts of Construction Works on the identified businesses;
  - (v) the contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s);
  - (vi) the procedures for ensuring that there is a contact person available for the duration of Construction Works, for public enquiries or complaints about the Construction Works;
  - (vii) methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in (i) above;
  - (viii) a summary of any proactive assistance provided to impacted businesses;
  - (ix) identification of opportunities to co-ordinate the forward work programme, where appropriate with infrastructure providers and development agencies; and
  - (x) linkages and cross-references to communication and engagement methods set out in other conditions and management plans (e.g. the SCEMP) where relevant.
- (b) Those business identified in (a)(i) shall not be included in the SCEMP.
- (c) Any DRMP prepared for a Stage of Work shall be submitted to Council for information ten working days prior to the Start of Construction for a Stage of Work.

**Example 2: Auckland Council Hearings Panel Recommendation: Notice of Requirement for Designation, Auckland Transport, Airport to Botany – Rongomai Park Bus Rapid Transit Corridor (13 December 2023)**

Development Response Management Plan

- (a) A DRMP shall be prepared prior to the Start of Construction for a Stage of Work.
- (b) The objective of the DRMP is to provide a framework to assist those directly affected by the Project (including directly affected and adjacent owners e.g., businesses, community organisations, households; and their tenants) to manage the impacts of construction and to maximise the opportunities the Project presents.
- (c) Business Associations and Community groups representing businesses and residents within the relevant Stage of Work shall be invited no later than 18 months prior to the Start of Construction for a Stage of Work, to participate in the development of the DRMP.
- (d) To achieve the objective, the DRMP shall include:
- (i) a list of those likely to be impacted by the Project;
  - (ii) recommended measures to mitigate impacts on identified businesses associated

**Example 2: Auckland Council Hearings Panel Recommendation: Notice of Requirement for Designation, Auckland Transport, Airport to Botany – Rongomai Park Bus Rapid Transit Corridor (13 December 2023)**

- with construction effects such as the potential loss of visibility of businesses from public spaces, reduction of accessibility and severance. Such mitigation measures may include business support, temporary placemaking and place activation measures and temporary wayfinding and signage;
- (iii) a summary of any proactive assistance to be provided to impacted businesses; identification of opportunities to co-ordinate the forward work programme, where appropriate with infrastructure providers and development agencies;
  - (iv) linkages and cross-references to communication and engagement methods set out in other conditions and management plans (e.g. the SCEMP) where relevant;
  - (v) recommended measures to mitigate effects on the operation and financial wellbeing of community organisations and sports clubs;
  - (vi) Recommended measures to provide support for anxiety and mental health outcomes;
  - (vii) Recommended hardship assistance package and hardship fund to be available for compensation of landowners, tenants, adjacent property owners and details of how people will qualify for any assistance.
  - (viii) Recommended assistance for tenants, leaseholders or owners who are asked to move during the works.

**Example 3: Auckland Transport Notice of Decision, Airport to Botany – Rongomai Park Bus Rapid Transit Corridor (21 February 2024)**

(unchanged from example 1 above – as lodged in form 18). Rejects the Hearings Panel's recommendations.

***Reject additions of clause (e)(vi) – (ix) – The Commissioners recognised and acknowledged in their recommendation that the Development Response Management Plan (DRMP) is focussed on business disruption effects from the Project only. Auckland Transport does not consider that the proposed additions which broaden the scope of the DRMP condition are justified. Notwithstanding this, the matters that the proposed additions attempt to address will be addressed through the PWA process, as set out in the evidence of Mr van der Ham.***

**Example 4: Auckland Transport Notice of Decision, Eastern Busway EB2 (20 October 2023)**

**9. Stakeholder Communication and Engagement**

The Requiring Authority must submit a final Communication and Consultation Plan (CCP) for certification in accordance with Condition 8. The objective of the CCP is to set out a framework to ensure appropriate communication and consultation is undertaken with the community, stakeholders, affected parties and interest groups during construction of the Eastern Busway Project (Package EB2).

10. The CCP must be prepared in accordance with the Draft CCP. The CCP must set out how the Requiring Authority will for the Eastern Busway Project (Package EB2):

- (a) Inform the community and businesses of construction progress and future construction activities;
- (b) Provide information on key project milestones;
- (c) Provide a process for responding to queries and complaints including, but not limited to:
  - (i) Who is responsible for responding;
  - (ii) How responses will be provided;
  - (iii) The timeframes for responses to be provided; and
  - (iv) How complaints will be reviewed and monitored to ensure mitigation is effective



Example 4: Auckland Transport Notice of Decision, Eastern Busway EB2 (20 October 2023)

11. The CCP must include:

...

k) A Development Response Addendum including:

- (i) The measures to maximise opportunities for pedestrian and service access to businesses, residents and social services/facilities that will be maintained during construction, within the practical requirements of the CTMP;
- (ii) The measures to mitigate potential severance and loss of business visibility issues by wayfinding and supporting signage for pedestrian detours required during construction;
- (iii) The measures to promote a safe environment during construction;
- (iv) How loss of amenity for residents, community services and businesses as a result of construction activities will be or has been mitigated through other management plans;
- (v) Identification of any other development response measures designed to support those businesses, residents and community services/facilities during construction.

(l) Details of engagement with the community to identify opportunities to minimise construction impacts;

(m) Details of monitoring the implementation of the CCP including, but not limited to:

- (i) Community feedback on the management of construction related impacts and the Requiring Authority's response to that feedback;
- (ii) And feedback and complaints received on matters other than addressed by (m)(i);
- (iii) Any outcomes or actions undertaken in response to feedback and complaints; and
- (iv) Any development response outcomes.

(n) The CCP must be reviewed at least annually and updated with reference to the outcomes of the monitoring listed in (m).

