



## SGA NW Strategic Package – Review of Soft Lodgement SIA RFI following receipt of SIA Addendum

SOFT LODGEMENT SIA REPORT - REQUEST FOR INFORMATION (PREPARED BY WSP ON 22/11/2022)		SIA ADDENDUM REVIEW OUTCOMES (PREPARED BY WSP ON 14/02/2023)
Specific Request	Reason for Request	
Introduction (Chapter 1)		
<p><b>Section 1.1 – Purpose and Scope</b></p> <p>Please clearly present the assumptions / exclusions that are applicable to this SIA in Section 1.1.</p>	<p>The assumptions and/or exclusions associated with the SIA study are not defined.</p> <p>It is noted that Section 3.3.1 presents the assumptions associated with determining the social area of influence, however the assumptions and/or exclusions for the overall investigations are not presented. This section should outline what aspects are excluded from the assessment (i.e. the extent to which property impacts and impact of property rights; economic impacts, cultural impacts, extent to which health impacts are considered etc.) and any other exclusions associated with engagement or any other key aspects of the study approach.</p>	<p>Assumptions are clearly set out in the SIA Addendum document. No additional information is required.</p>
Methodology (Chapter 3):		
<p><b>Section 3.1.2 Information Gathering:</b></p> <p>(1) Please provide a copy of the NW Strategy Engagement Summary Report (2021).</p>	<p>There has been limited engagement undertaken to support the SIA study. Engagement forms an important part the investigation as it provides the opportunity to:</p> <p>(i) Obtain an understanding of local values, knowledge and experiences,</p>	<p>The SIA Addendum provides additional engagement detail, identifies key themes relevant to the SIA, and summarises the outcome of interviews held. The response to the soft lodgement RFI and</p>



<p>(2) Did the SIA team rely on the summary report outcomes, or did the team have access to the raw data that was collected in order to analysis this with social lens?</p> <p>(3) As there is a strong reliance on the NW Strategy Engagement Summary Report (2021), please provide a list of the stakeholder groups identified as relevant to the SIA study and correlate this with the stakeholders that were involved in the previous engagement process to determine the extent to which this engagement is relevant to the SIA study.</p> <p>(4) Please explain the engagement strategy and / or the approach to the gathering of primary data to support the SIA and reasons for the decision to undertake limited engagement.</p>	<ul style="list-style-type: none"> <li>(ii) Validate existing data and obtain further primary data to support the assessment,</li> <li>(iii) Understand interests and perspectives of stakeholders and the communities,</li> <li>(iv) Ensure the assessment and identified mitigation and management measures are informed by local knowledge.</li> </ul> <p>The primary data collection undertaken to support the SIA study is limited to 5 stakeholder interviews – 1 school, and 4 community facilities. This is deemed inadequate as it does not cover the range of stakeholders that are likely to be affected by this package of projects. There is no clear engagement strategy or methods identified to target specific groups.</p> <p>There is a strong reliance on the NW Strategic Engagement Summary Report (2021). Whilst the findings of this report are integrated into the assessment of social impacts chapter, the context in which this data gathered, and the stakeholders involved in this engagement programme is not known. This earlier engagement was not designed to obtain information to support the SIA and was not implemented to specifically target an improved understanding of the social impacts identified in the early stages of the SIA process.</p>	<p>the Addendum provides sufficient context to the engagement. No additional information is required.</p>
<p><b>Section 3.2 – Impact Identification</b></p> <p>It is recommended that “Sustaining oneself” is removed as a social impact category.</p>	<p>The impact identification method correctly identifies the categories of social impacts in alignment with both the IAIA and Waka Kotahi SIA guideline, with the exception of the category described as “sustaining oneself” which does not appear in either guideline.</p>	<p>This has been addressed in the assessment of social impacts provided in the SIA Addendum. No additional information is required.</p>



	<p>Following a review how “sustaining oneself” has been applied in the of the Assessment of Social Impacts (Chapter 6), it appears that this category is assessed collectively with “way of life” and / or “community cohesion” categories. The aspects that are included in the consideration of “sustaining oneself” such as accessibility, peoples’ ability to meet their daily need, access employment, good and services etc. can be adequately covered under either “way of life” or “community cohesion” categories.</p>	
<p><b>Section 3.4 – Impact Rating and Assessment of Impacts</b></p> <p>Please adjust the impact rating method applied to ensure this meets the risk assessment method recommended in the IAIA and Waka Kotahi SIA guideline.</p>	<p>The impact assessment method presented on Page 10 has several shortfalls:</p> <ol style="list-style-type: none"> <li>(1) The method discussed does not identify the importance of describing and assessing impacts according to (i) the cause of the impact, and (i) the stakeholder / stakeholder group to be impacted (indirectly or directly) and their ability to adapt to change.</li> <li>(2) The description of the impact method in the text on Page 10 does not match the impact rating criteria presented in the table. The text identifies likelihood, duration, distribution, and scale; whilst the table presents the criteria as duration, extent and severity.</li> <li>(3) The assessment methodology does not consider “likelihood” (the probably of the impact occurring). This means that the impact assessment is one dimensional as it only considers the consequence of an impact and not the likelihood of this impact occurring. This method is therefore not a risk</li> </ol>	<p>The SIA Addendum provides a detailed assessment that is much improved from the Soft Lodgement SIA. The result is a much more robust assessment of impacts which has added significant value to the study outcomes. Some of the overall impact ratings differ from the original rating done on the Soft Lodgement SIA, illustrating that a more thorough assessment provided more clarity on the overall significant of some of the impacts.</p> <p>There are some remaining issues with the method used, but these are unlikely to significantly affected the overall assessment outcomes.</p> <p>For completeness, some suggestions relating to the method of assessment are provided for future reference and or application:</p> <ol style="list-style-type: none"> <li>(1) Each of the assessment criteria should be clearly defined and a scale provided.</li> </ol>

assessment method as recommended in the IAIA and Waka Kotahi SIA guidelines.

- (4) The rating method does not allow individual consideration of extent, duration and magnitude. The impact rating descriptions provided for very low, low, medium, high, and very high assume all the assessment criteria will be experienced at the same level. For example, an impact that is short term / temporary in duration (considered “very low”) but is likely to impact more than half the community identified (considered “high”) cannot be conveyed using the system as the assessor is required to choose the rating level which is pre-determined, rather than allowing the individual assessment of criteria determine the overall significance rating.

- (2) Magnitude has not been included in the assessment. This provides an important measure on how many people are likely to be affected (few, moderate, many). In the assessment undertaken, it appears that the column “Scale” addresses magnitude. In future it would be good to distinguish clearly between scale and magnitude.
- (3) Whilst a risk assessment approach has been applied (given the consideration of likelihood and consequence), consider use of the IAIA recommended methodology to assign a significance ratings in future assessments.

Significance Rating (Likelihood / Consequence)

		Consequence Level				
		1	2	3	4	5
Likelihood Level	Descriptor	Insignificant	Minor	Moderate	Major	Catastrophic
A	Almost certain	A1	A2	A3	A4	A5
B	Likely	B1	B2	B3	B4	B5
C	Possible	C1	C2	C3	C4	C5
D	Unlikely	D1	D2	D3	D4	D5
E	Rare	E1	E2	E3	E4	E5

Risk Rating ■ Low ■ Moderate ■ High ■ Extreme

- (4) In a few instances, the rating of significance pre-mitigation and post-mitigation are the same. This may indicate that the mitigation does not result in any improvement in the overall impact. If mitigation is effective in reducing an impact



		this should be reflected in the assessment rating.
<b>Social Area of Influence and Community Profile (Chapter 6)</b>		
<b>Section 6.2 – Wider Community</b>  Figure 3.2 needs improvement. It is recommended that the names of the communities be added as a minimum, and any other key points of reference relating to the area presented.	Improvements are required to the map to ensure it adds value to the readers understanding of the context being portrayed.	Addressed in SIA Addendum.
<b>Section 6.2.1 – Existing environment</b>  (1) Provide more detail on existing economic environment (primary economic activity / sectors represented in the area).  (2) Please include Riverhead into the review and assessment of the demographic statistics presented in Appendix B and Section 6.2.1  (3) Statistics need to be expanded to provide more detail on demographics and economic aspects.	<p>The existing environment description of the wider community does not provide much detail on the nature of the economic activities taking place in the area. What are the primary economic sectors in the area, what type of agricultural production is taking place etc.</p> <p>A more comprehensive review and analysis of statistics is required to contribute to an understanding of the social context in the project area:</p> <p>The use of statistics adds value to the baseline description of the community, informing an understanding of the social context in which the project is proposed. There are some data missing and expanded the analysis to include more data is recommended.</p> <p>Figure 3-3 presents that statistical area boundaries associated with the wider community which includes the areas of Kumeu rural west, Kumeu rural east, Kumeu – Haupai, Whenuapai, Taupaki, Waimauku, and Waipatukahu, and Riverhead. The statistics presented in</p>	Addressed in SIA Addendum.



	<p>Appendix B and summarized in Section 6.2.1 include all these areas, with the exception of the Riverhead area.</p> <p>Demographic statistical analysis to be expanded to include population by age group, deprivation index, and a profile of education and qualifications.</p> <p>Economic and employment statistics to be added to the analysis such as presentation of the economic profile of the area i.e. primary economic sectors; employment per sector and/or industry counts per employee, unemployment rate, NEET rate, etc.</p>	
<p><b>Section 6.2.2 – Future environment</b></p> <p>Figure 3.4 needs improvement. There is no legend for the map, a zoning key is required to explain the zoning categories, and communities are not identified on the map to provide the relevant context to the reader.</p>	<p>These improvements are required to ensure the map adds value to the readers understanding of the context being portrayed.</p>	<p>Addressed in SIA Addendum.</p>
<p><b>Section 6.3 – Local Community</b></p> <p><b>NoR 1 – Alternative State Highway including Brigham Creek</b></p> <ul style="list-style-type: none"> <li>(1) Update Figure 3-6 by the adding the names of the communities and any other landmarks</li> <li>(2) The extent of the corridor (length) is not provided within the existing environment description.</li> </ul>	<p>Improvements are required to ensure the map adds value to the readers understanding of the context being portrayed.</p> <p>The extent of the corridor needs to be described to contextualise the scale of the project component.</p> <p>The description of the existing environment states that the majority of the existing local community is made up of rural properties and that zoning is either Mixed Rural, Rural Production or Countryside Living. A more detailed description of the current use of rural properties is</p>	<p>Addressed in SIA Addendum.</p>



<p>(3) Further information needs to be provided on the nature of the local community, in particular what proportion of the rural properties are used for rural production and what agricultural activities are prevalent.</p>	<p>required in order to understand the context in which the project is proposed to take place.</p>	
<p><b>NoR 2 – SH16 Main Road Upgrade</b></p> <p>(1) Update Figure 3-7 by the adding the names of the communities and any other landmarks</p> <p>(2) Whilst the report provides a detailed description of both township areas, further information needs to be provided on the nature of rural land use, in particular what extent of the section consists of rural properties, the nature of rural activities (i.e. lifestyle properties or agricultural production?).</p>	<p>Improvements are required to ensure the map adds value to the readers understanding of the context being portrayed.</p> <p>A more detailed description of the current use of rural properties is required in order to better understand this aspect of the current local community.</p>	<p>Addressed in SIA Addendum.</p>
<p><b>NoR 3 – Rapid Transit Network and Active Mode Corridor (including Kumeū &amp; Huapai Transit Stations)</b></p> <p>(1) Update Figure 3-8 by the adding the names of the communities and any other landmarks</p>	<p>Improvements are required to ensure the map adds value to the readers understanding of the context being portrayed.</p> <p>A more detailed description of the current use of rural properties is required in order to better understand this aspect of the current local community. For example, are</p>	<p>Addressed in SIA Addendum.</p>

<p>(2) Provide details on the extent of the corridor (length, number of properties affected, etc. within the existing environment description.</p> <p>(3) Provide a description of the use of rural properties.</p>	<p>the rural properties largely lifestyle properties, or is agricultural production taking place.</p>	
<p><b>NoR 4 – Access Road Upgrade</b></p> <p>(1) Update Figure 3-9 to reflect key features on the map that are referenced in the description of the existing environment.</p>	<p>Improvements are required to ensure the map adds value to the readers understanding of the context being portrayed.</p>	<p>Addressed in SIA Addendum.</p>
<p><b>Identification, Description and Assessment of Social Impacts:</b></p>		
<p><b>Assessment of Social Impacts (Chapter 7)</b></p> <p>Overall, there are concerns around the assessment undertaken, largely as a result of the methodology applied and the structure of the chapter, but also in terms of the level of assessment detail provided. For this reason, comments have been provided at a broad level (rather than at a detailed level):</p> <p>(1) Potential positive and negative social impacts need to be</p>	<p>Overall, the assessment of impacts has some weaknesses:</p> <p>(1) Impacts are not clearly identified and assessed:</p> <ul style="list-style-type: none"> <li>At a broad level, the chapter is structured in a way that impacts are broadly discussed collectively according to phase (route protection, construction, and operation), and then social area of influence (regional, wider community, and local community). Based on this structure it is difficult to identify what the individual impacts are, which stakeholders /groups are likely to be affected and</li> </ul>	<p><b>Assessment</b></p> <p>SIA Addendum provides a much-improved assessment of social impacts. The post mitigation assessment provides insight into the effectiveness of the mitigation and any potential residual impact. Whilst there might be some minor difference of opinion on the way in which some of the impacts have been assessed, there are no significant shortfalls of the assessment.</p>



<p>identified, described and assessed according to:</p> <ul style="list-style-type: none"> <li>- Cause of the impact</li> <li>- Stakeholder / stakeholder group impacted</li> <li>- Consequence of the impact (determine through the individual consideration of extent, duration and magnitude)</li> <li>- Likelihood of the impact (estimation of probability)</li> <li>- Overall significance rating based on a risk assessment method that considers both consequence and likelihood.</li> </ul> <p>(2) The assessment should consider socio-economic impacts and impacts on the business stakeholders.</p> <p>(3) The assessment needs to be considerably more specific in terms of identifying the specific effects on localised areas.</p> <p>(4) The structure of the chapter should be revisited. It is</p>	<p>the extent of the impact (i.e. number of properties, residents, businesses affected).</p> <ul style="list-style-type: none"> <li>• The assessment has been undertaken on the categories of impacts and the impacts that fall within the categories have not been individually assessed i.e. “low-moderate negative impacts on way of life and health and wellbeing”.</li> <li>• The assessment section is in some cases fairly generic and is therefore unclear on specific impacts on localised areas.</li> <li>• Socio-economic impacts and impacts on business stakeholders within the area have not been identified, discussed or assessed.</li> </ul> <p>(2) Stakeholders have not been clearly identified:</p> <ul style="list-style-type: none"> <li>• Assessment is structured according to social area of influence i.e. a broad discussion is provided on the anticipated impacts on the ‘wider community’ or the ‘local community’. In the discussion, stakeholders are referenced as “people”, the “regional community” – it is not clear which stakeholders within the community are affected i.e. business community, rural residents, urban residents, etc. and some stakeholder may be affected to different extents and in different ways.</li> <li>• The extent of the impact on various stakeholder groups is not clear i.e. how many rural properties or business premises will be affected.</li> </ul>	<p>It is suggested that the following be reviewed and considered:</p> <p><u>NoR S1 (Alternative State Highway incl Brigham Creek Interchange)</u></p> <ul style="list-style-type: none"> <li>- Temporary reduction in use of Fred Taylor Park for recreation – consider assessing the impact on the local community and West Coast Rangers Football Club and members separately. The impact may differ between these two stakeholder groups.</li> </ul> <p><u>NoR S2 (SH16 Main Road Upgrade)</u></p> <ul style="list-style-type: none"> <li>- Reduced business patronage on Main Road – consider loss of revenue for businesses as an impact.</li> </ul> <p><b>Mitigation</b></p> <p>Mitigation and management measures have been identified. These are considered adequate, with the exception of the mitigation identified for the impact on / loss of recreational facilities. The mitigation outlined is as follows:</p> <p>In respect of Fred Taylor Park:</p> <p><i>“Conversations are currently underway with Auckland Council to determine how best to mitigate impacts on Fred Taylor Park – a preferred solution will be determined following detailed design.”</i></p>
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<p>recommended that the assessment be structured by impact, rather than by phase and area of influence. For example – the impact of “reduced access to properties” should be assessed for each phase in terms of the cause of the impact; groups impacted; and the consequence, likelihood and overall significance of the impact pre and post mitigation, and identification of the management and mitigation measures identified.</p> <p>(5) A mitigation chapter or mitigation table is needed that provides a description of all the management and mitigation measures and provides detail on each of these.</p>	<p>(3) The assessment undertaken does not use a risk assessment method as recommended in the IAIA and Waka Kotahi SIA guideline documents.</p> <p>(4) There is inconsistency in the how the discussion is presented by phase i.e. regional impacts and NoR route protection phase impacts have been discussed in discussion paragraphs, whilst NoR construction and operational impacts are presented in tables.</p> <p>(5) Management and mitigation measures are not adequately addressed:</p> <ul style="list-style-type: none"><li>• Impacts are not consistently assessed in terms of significance pre- and post- mitigation (no post mitigation assessment provided for regional impacts and route protection impacts)</li><li>• It is not clear the extent to which the measures address the impact and whether there is a residual impact that remains</li></ul> <p>Mitigation measure are spread throughout the chapter and there is insufficient detail on the mitigation proposed.</p>	<p>In respect of Huapai Domain:</p> <p><i>“At the time this SIA was prepared discussions were underway with Auckland Council around appropriate mitigation for Huapai Domain – such as a reconfiguration of facilities at the Domain to allow activities to continue.</i></p> <p><i>In addition to these ongoing conversations, it is recommended that the West Coast Rangers and Kumeu Cricket Clubs are consulted to understand their needs with regards to the Domain and how these can be incorporated into the design of the preferred solution.”</i></p> <p>It is recommended that the mitigation identified be revisited, as ‘conversations’ are not considered adequate mitigation.</p>
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