

10 August 2021

Attention: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir / Madam

**NOTICE OF REQUIREMENT BY CITY RAIL LINK LIMITED FOR ALTERATION OF
BRITOMART TRANSPORT CENTRE DESIGNATION 2501**

Please find attached Auckland Transport's submission on the above Notice of Requirement by City Rail Link Limited.

If you have any queries in relation to this submission, please contact Teresa George on 09 448 7275 or teresa.george@at.govt.nz.



Teresa George
Senior Planner, Land Use Policy and Planning (Central)

Encl: Auckland Transport's submission on Notice of Requirement for the alteration to the existing Britomart Transport Centre Designation 2501

Cc: City Rail Link Limited
PO Box 9681
Newmarket
Auckland 1149
Attention: Richard Jenkins, CRL Principal Planner
Email: richard.jenkins@cityraillink.govt.nz



SUBMISSION BY AUCKLAND TRANSPORT ON A NOTICE OF REQUIREMENT BY CITY RAIL LINK LIMITED FOR ALTERATION OF BRITOMART TRANSPORT CENTRE DESIGNATION 2501

To: Auckland Council – Plans and Places
Private Bag 923000
Auckland 1142

Submission on: Alteration to Designation 2501 Britomart Transport Centre by City Rail Link Limited to enable the retention of the Station Plaza Accommodation at Britomart so the building and surrounding Station Plaza area can be used as a construction support facility for works in the City Rail Link tunnels located within the adjoining designation, with the identification of the construction support activity components.

From: Auckland Transport – Planning and Investment
Private Bag 92250
Auckland 1142

Introduction:

Auckland Transport is a Council Controlled Organisation (CCO) of Auckland Council with the legislated purpose to contribute to an “effective, efficient and safe Auckland land transport system in the public interest”.¹ In fulfilling this role, Auckland Transport is responsible for:

- a. The planning and funding of public transport;
- b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
- c. Operating the local roading network; and
- d. Developing and enhancing the local road, public transport, walking and cycling networks.

Auckland Transport could not gain an advantage in trade competition through this submission.

Auckland Transport’s submission is:

Auckland Transport supports the Notice of Requirement, subject to the matters raised in **Attachment 1** being addressed to ensure that any adverse effects on the operation of the transport network are avoided, remedied or mitigated.

Auckland Transport wants to ensure that the temporary construction related effects on the ongoing operation of the transport network are appropriately mitigated, including through the inclusion of conditions that deal with the following:

- The requirements and mitigation of the potential construction related effects associated with the scope of the alteration
- Routing of construction vehicle and truck movements
- Manoeuvring of construction vehicle and truck movements to and from the construction site

¹ Local Government (Auckland Council) Act 2009, section 39

- Access to existing properties
- Managing cumulative temporary construction related effects
- Monitoring of construction effects.

This submission acknowledges the requirement for the applicant to seek Auckland Transport's s177(1)(a) approval to alter Auckland Transport's Designation 1556 as the underlying designation to City Rail Link Limited's (CRL) 2501 Designation. The matters of concern that are outlined in **Attachment 1** will also need to have been addressed by CRL before section s177(1)(a) approval is given by Auckland Transport.

The specific parts of the Notice of Requirement that this submission relates to and reasons for Auckland Transport's views are outlined in **Attachment 1**.

Auckland Transport seeks resolution of the various matters raised in this submission which, for example, could include amended conditions, additional conditions, and/or methods to ensure any effects on the transport network are managed in support of the proposal.

Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

Recommendations sought:

The recommendations that Auckland Transport seeks from the Council are set out in **Attachment 1**.

In all cases where amendments to the Notice of Requirement are proposed, Auckland Transport would consider alternative wording or amendments which address the reasons for Auckland Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the recommendations sought.

Appearance at the hearing:

Auckland Transport wishes to be heard in support of this submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.



Signed for and on behalf of Auckland Transport

Christina Robertson
Group Manager, Strategic Land Use and Spatial Management

Date: 10 August 2021

Address for service: Teresa George
Auckland Transport
Private Bag 92250
Auckland 1142

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Email: Teresa.George@at.govt.nz

Attachment 1

Issue	Position	Reasons	Recommendation sought from the Council
<p>General overview</p>	<p>Support, subject to concerns being addressed</p>	<p>City Rail Link Limited is seeking a Notice of Requirement (NOR) to alter their existing Designation 2501 – Britomart Transport Centre.</p> <p>The NOR provides for an alteration to the existing designation to enable the retention of the Station Plaza Accommodation building at Britomart, so that the building and surrounding Station Plaza area can be used as a construction support facility for works in the City Rail Link tunnels located within the adjoining designation.</p> <p>Auckland Transport supports and recognises the need for the works associated with the NOR to facilitate the construction of the City Rail Link (CRL) project. When completed, the CRL will support the wider growth of the region by enabling improved public transport network connections, frequency and capacity.</p> <p>Given that the works associated with the construction of the CRL requires construction to take place within the existing City Centre environment, the need to co-ordinate and safeguard the operation and on-going provision of other infrastructure is unavoidable, including access to and the operation of existing transport infrastructure and facilities.</p> <p>Auckland Transport seeks resolution of the various matters raised in this submission which, for example, could include conditions and/or methods to ensure any effects on the transport network are managed in support of the proposal. These matters may broadly relate to a range of concerns or issues including but not limited to construction management, maintaining the operation of public transport facilities, ensuring pedestrian accessibility and safety, vehicle access and safety.</p>	<ul style="list-style-type: none"> • Agreement with the proposal to alter the existing designation, subject to any further or other relief, or other consequential or other amendments considered appropriate and necessary to address the concerns identified in this submission.

Issue	Position	Reasons	Recommendation sought from the Council
Section 177(1)(a) approval	Support in part	<p>Auckland Transport's Designation 1556 for the construction, operation and maintenance of a transport centre and the provision of a rail system is the underlying designation to City Rail Link Limited's (CRL) 2501 Designation.</p> <p>As the Requiring Authority for Designation 1556, Auckland Transport is responsible for ensuring that the on-going operation of the Britomart Station is not hindered or prevented. This includes the safe and convenient pedestrian access to and from the station. Auckland Transport notes that the matters of concern that it has outlined in this submission will also need to be addressed by CRL before section 177(1)(a) approval is given by Auckland Transport.</p> <p>The Assessment of Environmental Effects (AEE) indicates that section 177(1)(a) approval under the RMA will be sought from Auckland Transport² and it is understood that this approval had not been sought at time this submission was made.</p>	<ul style="list-style-type: none"> That before Auckland Transport's approval is given under s177(1)(a), the concerns outlined in this submission will need to have been addressed by CRL.
Effects on the transport network (temporary network operations) – designation condition	Support in part	<p>The applicant's AEE indicates that construction traffic related effects would be less than minor, with this being premised on applying a Construction Traffic Management Plan (CTMP).</p> <p>The applicant has provided an Integrated Transport Assessment (ITA)³ report to support the proposed NOR. Auckland Transport broadly agrees with the approach of applying a CTMP to manage temporary effects on the surrounding transport network. It is noted</p>	<ul style="list-style-type: none"> To amend Designation 2501 conditions by including an additional condition setting out the objectives and key requirements of the Construction Traffic Management Plan (CTMP) as they relate to "The Works" associated with the NOR alteration.

² Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, June 2021, Table 3-2.

³ Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Appendix C City Rail Link: Britomart Transport Centre Integrated Transport Assessment, June 2021

Issue	Position	Reasons	Recommendation sought from the Council
		<p>that a CTMP has been included as part of the applicant's Construction Environmental Management Plan.⁴</p> <p>The existing conditions for Designation 2501 includes a suite of transport related conditions (section 24 General Transport, Access and Parking) which relate to the scope of works as identified and defined as "The Project"⁵ in the designation conditions.</p> <p>The scope of works and activities associated with the alteration is set out in a proposed amendment to Designation 2501 through the definition of "The Works"⁶. The existing transport conditions for Designation 2501 (relating to "The Project") do not directly align with the scope of activities and potential effects associated with the alteration to Designation 2501 as defined by "The Works".</p> <p>To provide a greater level of certainty that the relevant and potential effects of "The Works" will be addressed as part of the CTMP, Auckland Transport seeks an amendment to Designation 2501 to include a condition that outlines the transport related objectives as discussed in the ITA and identifies the key requirements that need to be addressed as part of the CTMP as they relate to "The Works" associated with the NOR alteration. This includes but is not limited to avoiding and managing</p>	

⁴ Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Appendix D Construction Environmental Management Plan, 25 June 2021

⁵ As notes in the AEE section 1.3, these works relate to CRL Contract 1 Works and included construction within the BTC, including the Chief Post Office (CPO) and Glasshouse buildings, use of Station Plaza to the rear of the CPO and Glasshouse for a temporary station building (Station Plaza Accommodation (SPA)), and a construction support area (CSA) in lower Queen Street.

⁶ Proposed definition of "The Works" - Construction support works to enable construction in adjoining City Rail Link Designation 2500-1, including site office, worker accommodation and storage of materials in the Station Plaza Accommodation, receiving and pumping concrete from the Britomart Transport Centre into the Designation 2500-1 tunnels, establishing and operating ventilation equipment in Station Plaza, and providing access for workers and delivery of materials to the Designation 2500-1 tunnels via the Glasshouse and former Chief Post Office.

Issue	Position	Reasons	Recommendation sought from the Council
		<p>construction effects on the operation of public transport services and ensuring safe pedestrian movements in the vicinity of the Britomart Transport Centre during the period of construction activities.</p> <p>The specific matters to be included as part of the amendments to the conditions sought are discussed further in the below points.</p>	
Transport priorities	Support	<p>The ITA supporting the NOR application has identified the following priority traffic movements along Commerce Street, Galway Street and Tyler Street during “The Works”:</p> <ul style="list-style-type: none"> • Pedestrian and public transport would be afforded the highest priority, along with other essential movements, including emergency services • Essential vehicle access to properties within or adjacent to “The Works” area, such vehicles would include service and delivery vehicles • Private car travel during off-peak periods given the lowest priority, particularly extraneous vehicles, which should be encouraged to avoid passing through the area.⁷ <p>Auckland Transport agrees that these are appropriate priority traffic movements and would like these reflected in a designation condition where this clearly outlines the objectives for the CTMP. The objectives should include an emphasis on ensuring the safe movement for all transport users during the construction period.</p>	<ul style="list-style-type: none"> • To amend the conditions of Designation 2501 by including an additional condition setting out the objectives of the Construction Traffic Management Plan (CTMP) as they relate to “The Works” associated with the NOR alteration. This should reflect the transport priorities identified in the ITA including the traffic movements along Commerce, Galway and Tyler Streets, and the need to ensure safe transport movements for all users, including pedestrians and public transport passengers.

⁷ Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Appendix C City Rail Link: Britomart Transport Centre Integrated Transport Assessment, June 2021, section 3.4

Issue	Position	Reasons	Recommendation sought from the Council
<p>Effects on the transport network (temporary network operations) – routing and timing of construction vehicle and truck movements</p>	<p>Support in part</p>	<p>The proposal includes additional truck and delivery movements along Commerce Street to facilitate the temporary construction related activities. This includes major deliveries, concrete trucks material deliveries and general (minor) deliveries.⁸</p> <p>Commerce Street is part of the frequent transport public transport network with a high frequency of bus movements (through movements and terminating services) throughout the day⁹. Bus movements along Commerce Street are predominantly in a southbound direction entering via the Quay Street intersection and exiting via the Customs Street East intersection. The additional construction related vehicles have the potential to conflict with the safe and efficient operation of the public transport network. It is important that public transport reliability is not hindered or compromised by “The Works” proposed as this has the potential to have flow-on effects on the operation of the wider public transport network such as “bunching” of scheduled services and delays impacting on connecting services or transfers.</p> <p>Where the movement of construction related vehicles has the potential to adversely affect the safe and efficient operation of the immediate transport network, these effects need to be appropriately assessed and mitigated where required to ensure that truck movements do not compromise bus reliability. To avoid and minimise adverse effects on the operation of bus operations along Commerce Street, Auckland Transport proposes that</p>	<ul style="list-style-type: none"> To amend Designation 2501 conditions by including an additional condition setting out the requirements of the Construction Traffic Management Plan (CTMP) as they relate to “The Works” associated with the NOR alteration. This should include routing construction vehicle and truck movements to and from the site via the Commerce Street and Quay Street intersection.

⁸ Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Appendix D Construction Environmental Management Plan, 25 June 2021, section 2.6. Concrete trucks – over two stages for a total of 40 days and for the days of delivery up to 40 concrete trucks per day (with three to four trucks per hour) over each period of concrete delivery. Minor deliveries are expected to require limited or no traffic management and no major lifting of equipment (estimated 5-10 vehicle movements per day). Major deliveries will require defined traffic management with road closures and will likely require heavy lifting equipment (based on the current programme an estimated peak vehicle movements of up to 40 trucks per day, at 3-4 trucks per hour).

⁹ Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Appendix C City Rail Link: Britomart Transport Centre Integrated Transport Assessment, June 2021, refer to section 2.3.2 for description of bus services and facilities.

Issue	Position	Reasons	Recommendation sought from the Council
		<p>construction vehicle and truck movements to and from the site are routed via the Commerce Street and Quay Street intersection. It is recommended that this arrangement is incorporated into the proposed designation condition.</p>	
<p>Effects on the transport network (temporary network operations) – manoeuvring of construction vehicle and truck movements to and from the site</p>	<p>Support in part</p>	<p>The proposal involves the manoeuvring (requiring multiple movements) of construction vehicles during periods of high pedestrian movements on Tyler Street. There is a need to ensure that access on Tyler Street operates safely at all times by minimising potential conflicts, particularly between active (walking and cycling) modes, and associated construction/delivery vehicles. It is also important that other vehicles entering and exiting properties on Tyler Street will be able to do so and that mobility parking in the area is maintained at all times.</p> <p>While the Section 92 response provides the tracking for Concrete Truck deliveries, Section 3.2 of the Constructability Report refers to heavy vehicle movements that will include deliveries such as fire hydrant piping, bulk cable containment, blockwork, steelworks and large cable drums.¹⁰ The tracking for trucks proposed to deliver the aforementioned materials have not been accounted for in the vehicle tracking provided in the Section 92 response.¹¹</p> <p>To accommodate all construction vehicle deliveries, an internal access lane along Tyler Street is to be provided for trucks to manoeuvre to the appropriate location within the site, with concrete trucks reversing into this access from Commerce Street to only take place outside the morning and evening peak periods. This access will be maintained appropriately by the Site Traffic</p>	<ul style="list-style-type: none"> • To provide further information confirming the vehicle tracking for both major and minor truck delivery vehicles intending to use the construction vehicle access off Tyler Street, including major truck deliveries for fire hydrant piping, bulk cable containment, blockwork, steelworks and large cable drums. This should also include tracking of other vehicles entering and exiting existing properties on Tyler Street. • To provide further information confirming whether the restrictions on forward/reverse manoeuvring from Commerce Street into Tyler Street applies to all

¹⁰ Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Assessment of Environmental Effects (Appendix A) 'Constructability Report' Dated 25 June 2021 – Section 3.2 ('Major Deliveries')

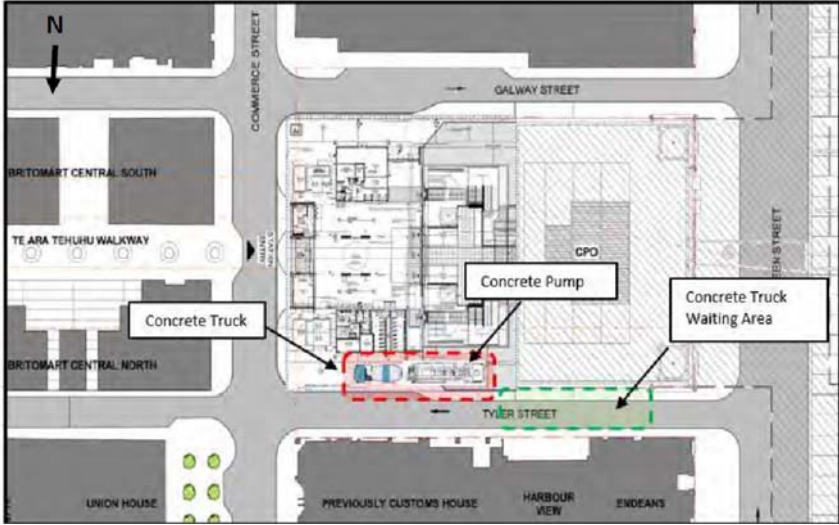
¹¹ City Rail Link Limited – Response to Section 92 RMA 'Request for Further Information' – Notice of a Requirement to Alter City Rail Link Limited Designation 2501 in the Auckland Unitary Plan Dated 26 July 2021-. Attachment 2: Concrete Truck Tracking.

Issue	Position	Reasons	Recommendation sought from the Council
		<p>Management Supervisor and traffic controllers.¹² Clarification is sought as to whether this reverse manoeuvring movement also applies to other non-concrete truck deliveries.</p> <p>Further information is sought to confirm the vehicle tracking for major delivery vehicles as referred to in Section 3.2 of the Constructability Report for these vehicles intending to use this access off Tyler Street (including turning around on the site). Depending on the outputs of this vehicle tracking analysis, additional requirements may be sought through the proposed designation condition to ensure that manoeuvring to and from the site can be undertaken in a safe manner.¹³</p>	<p>construction delivery movements or concrete trucks only.</p> <ul style="list-style-type: none"> To include a condition setting out any specific requirements that will ensure manoeuvring to and from the site can be undertaken in a safe manner.
<p>Effects on the transport network (temporary network operations) – control of vehicle movements at Commerce Street / Tyler Street intersection</p>	<p>Oppose in part</p>	<p>The proposals include Stop/Go operation on Commerce Street and require the control of pedestrians to allow for large vehicles to reverse from Commerce Street into Tyler Street and “The Works” site. Stop/Go control is proposed outside of peak periods (7am-9.30am and 3pm-6pm). At these peak times, vehicles will be required to manoeuvre within Tyler Street. Auckland Transport seeks further clarification around how the PM peak times have been determined by the applicant.</p> <p>The ITA highlights that 50% of pedestrians cross Commerce Street ad hoc away from the controlled pedestrian crossing. Effectively controlling the whole area in the vicinity of the Commerce Street/Tyler Street intersection is likely to be extremely difficult to achieve. Therefore, there is a safety risk associated with pedestrians walking into the area where a truck may be reversing.</p>	<ul style="list-style-type: none"> To provide further information confirming how the PM peak times have been determined. To amend the conditions of Designation 2501 by including an additional condition setting out the requirements of the Construction Traffic Management Plan (CTMP) as they relate to “The Works” associated with the NOR alteration. This should include a condition that confirms that all trucks will

¹² Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Appendix C City Rail Link: Britomart Transport Centre Integrated Transport Assessment, June 2021, section 3.1

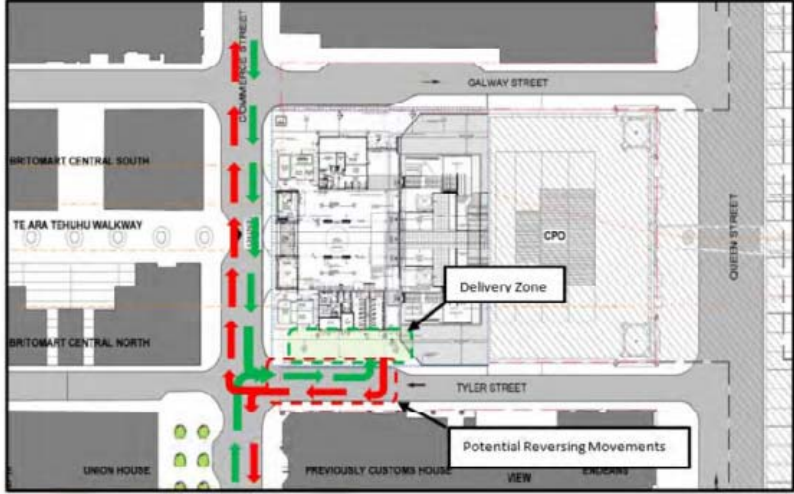
¹³ The Integrated Transport Assessment notes in section 3.2.2 that the manoeuvring within Tyler Street has been tested on site (under the control site traffic management supervisor). The safety aspects of this testing have not be discussed and whether this test was undertaken during periods of high pedestrian activity.

Issue	Position	Reasons	Recommendation sought from the Council
		<p>Indicative traffic management plans provided in the Section 92 response show that Stop/Go operation is located on Commerce Street in very close proximity to Quay Street. This close proximity to Quay Street means motorists will need to be alert to the potential need to stop and there is a risk of vehicles queuing back onto Quay Street and across the pedestrian crossing across Commerce Street at this intersection. As this street is frequently used by buses, the risk of the pedestrian crossing being blocked by a bus is high due to the length of these vehicles.</p> <p>It is acknowledged that the traffic management plans provided in the Section 92 response are illustrative of what has previously been approved. However, the frequency of use of the Stop/Go operation is likely to be more significant during the concrete pours. Therefore, this heightens the potential for safety issues to occur due to the frequent operation of the Stop/Go control.</p> <p>The vehicle tracking included within the Section 92 response demonstrates that trucks are able to turn around within Tyler Street. Utilising Tyler Street for trucks to turn around at all times, not just during the weekday peaks, would enable the activity to be more tightly controlled and would avoid any adverse effects on bus operations, pedestrians and safety on Commerce Street.</p> <p>Auckland Transport recommends a condition is included that all trucks will be required to access Tyler Street in a forward direction and turn around on site / within Tyler Street at all times of operations, not just during the weekday peak periods. This would enable the activity to be more effectively controlled and would minimise conflicts with reversing vehicles. It would avoid safety issues and impacts on bus operation and reliability with Stop/Go operation.</p>	<p>enter Tyler Street in a forward direction and manoeuvre within the street/on site to avoid safety and operational effects on Commerce Street.</p>


Issue	Position	Reasons	Recommendation sought from the Council
<p>Effects on the transport network (temporary network operations) – property access</p>	<p>Oppose in part</p>	<p>Figure 9 of the ITA shows the location of the Concrete Truck Waiting Area. This is positioned towards the western end of Tyler Street and appears to be located such that it would block access to the parking / delivery area for Harbour View. Whilst trucks may be positioned in the waiting area intermittently, they could block access to Harbour View and may create operational issues for the movement of trucks, other vehicles and pedestrians.</p>  <p>Auckland Transport recommends that the operation of the Concrete Truck Waiting area be reviewed to avoid blocking access to Harbour View and adversely affecting pedestrian movement and safety along Tyler Street. This could include avoiding the requirement for the waiting area through management of the arrival of concrete trucks at Tyler Street.</p>	<ul style="list-style-type: none"> • That a review of the requirement for the Concrete Truck Waiting Area through management of arrival of trucks to Tyler Street is undertaken and that the position of the Concrete Truck Waiting Area on Tyler Street maintains access to the parking/delivery area for Harbour View. • That a condition is included that will set out specific requirements confirming that the location of the Concrete Truck Waiting Area would not block access to the parking/delivery area for Harbour View.
<p>Effects on the transport network</p>	<p>Oppose in part</p>	<p>The ITA states in Section 3.3 that no car parking will be provided for staff and visitors. This is supported as the site is located close</p>	<ul style="list-style-type: none"> • To amend the conditions of Designation 2501 by

Issue	Position	Reasons	Recommendation sought from the Council
(temporary network operations) – site workers		<p>to public transport and there are various public car parks within an easy walking distance of the site.</p> <p>There is the potential that some workers may drive work vehicles to the site to unload and load tools at the start and end of each workday. Such deliveries should be avoided as far as possible to minimise extraneous traffic on Commerce Street which may adversely affect bus operations.</p> <p>Auckland Transport recommends that the CTMP be amended to include requirements that expressly prevent workers loading and unloading tools each day.</p>	<p>including an additional condition setting out the requirements of the Construction Traffic Management Plan (CTMP) as they relate to “The Works” associated with the NOR alteration. This should include restricting workers travelling to the site each day by private vehicle to load and unload tools or equipment.</p>
Construction traffic routes	Support in part	<p>Construction vehicle routes have been identified in the Constructability Report and the ITA. The Constructability Report (Appendix A of the AEE) proposes that truck movements for minor and major deliveries to and from the site will be travelling via either Customs Street East or Quay Street (inbound trips shown in green and outbound trips in red).¹⁴</p>	<ul style="list-style-type: none"> • To provide further information confirming the vehicle tracking for vehicles using the Quay Street / Commerce Street intersection. • To amend Designation 2501 conditions by including an additional condition setting out the requirements of the Construction Traffic Management Plan (CTMP) as they relate to “The Works” associated with the NOR alteration. This should include routing construction vehicle and truck

¹⁴ Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Assessment of Environmental Effects (Appendix A) ‘Constructability Report’ Dated 25 June 2021 – Figure 3.7

Issue	Position	Reasons	Recommendation sought from the Council
		 <p data-bbox="712 790 1104 805"><i>Figure 3.7 Proposed delivery route for major and minor deliveries</i></p> <p data-bbox="705 818 1552 954">The ITA developed by Flow (Appendix C of the AEE) proposes truck movements for minor and major deliveries to and from the site will travel via the Quay Street / Commerce Street intersection shown below (yellow line)¹⁵.</p>	<p data-bbox="1630 268 2000 568">movements to and from the site via the Commerce Street and Quay Street intersection and any mitigation measures supporting the safe operation of the Quay Street / Commerce Street intersection.</p>

¹⁵ Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Assessment of Environmental Effects (Appendix C) 'Integrated Transport Assessment' Dated June 2021 – Figure 8

Issue	Position	Reasons	Recommendation sought from the Council
		<p data-bbox="712 264 869 284">Figure 8: Site access</p>  <p data-bbox="712 927 1552 1126">As noted above, Auckland Transport supports the construction traffic routes proposed in the ITA where construction traffic movements are shown as travelling to and from the site via the Quay Street/Commerce Street intersection only. The section 92 response has confirmed that traffic will only arrive and depart from Quay Street east of Commerce Street.¹⁶</p> <p data-bbox="712 1161 1552 1227">In relation to the operation of the Quay Street / Commerce Street intersection, the ITA has identified that buses left-turning from</p>	

¹⁶ City Rail Link Limited – Response to Section 92 RMA ‘Request for Further Information’ – Notice of a Requirement to Alter City Rail Link Limited Designation 2501 in the Auckland Unitary Plan Dated 26 July 2021. Point 3. ‘Heavy Vehicle Access Routes’.

Issue	Position	Reasons	Recommendation sought from the Council
		<p>Quay Street frequently track over the opposing northbound right-turn lane located at the northern end of Commerce Street.¹⁷</p> <p>Auckland Transport seeks that the use of the Quay Street/Commerce Street intersection for construction traffic and truck movements and any further mitigation resulting from the requested vehicle tracking information (e.g. setting back the limit line for right-turning movements from Commerce Street into Quay Street) is incorporated into the proposed designation condition relating to “The Works.”</p>	
Cumulative temporary construction related effects	Support in part	<p>The applicant’s AEE notes a number of on-going construction activities within the immediate vicinity of “The Works.” This includes Cooper and Company’s refurbishment of the Barrington and Sofrana buildings on the southern side of Galway Street, refurbishment work at the former HSBC building at 1 Queen Street and other CRL works at Britomart Station.¹⁸ “The Works” associated with the NOR alteration are estimated to take place between late 2021 until late 2023. This construction timeframe will overlap with other construction activity in the area including Cooper and Company’s construction activities which are expected to be completed in July 2022.</p> <p>With these overlapping construction activities, there is a need for wider co-ordination with other development parties to ensure that the cumulative effects of construction activities do not compound adverse effects on pedestrian safety and accessibility and the operation of public transport along Commerce Street. For example, any restrictions on pedestrian access along both Galway Street and Tyler Street should not occur at the same time</p>	<ul style="list-style-type: none"> • To amend Designation 2501 conditions by including an additional condition setting out the requirements of the Construction Traffic Management Plan (CTMP) as they relate to “The Works” associated with the NOR alteration. This should include a wider construction activity strategy (or similar) to co-ordinate the cumulative construction effects of:”The Works” with other nearby construction activities.

¹⁷ Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Assessment of Environmental Effects (Appendix C) ‘Integrated Transport Assessment’ section 2.3.2

¹⁸ Assessment of Effects on the Environment, Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, June 2021, section 3.4.2

Issue	Position	Reasons	Recommendation sought from the Council
		<p>and similarly construction deliveries, particularly those requiring site traffic management supervisor control, should ideally not take place at the same time.</p> <p>Auckland Transport seeks that a wider construction activity strategy or similar is incorporated as a requirement into the proposed designation condition relating to “The Works.”</p>	
Amendment to designation conditions – removal of Station Plaza Accommodation	Support in part	<p>The proposed amendments to Designation 2501 includes the following amendment to recognise the temporary nature of “The Works”:</p> <p><i><u>The Station Plaza Accommodation shall be removed within one year of retained following completion of the Project works in order to enable the Works (and any other contemporaneous works permitted under this designation), but shall be removed on completion of the Works.</u></i></p> <p>Auckland Transport supports this proposed amendment to the designation condition and suggests that a reference to reinstatement of the Station Plaza be included as part of the proposed designation condition relating to “The Works.”</p>	<ul style="list-style-type: none"> • To amend Designation 2501 conditions by including an additional condition setting out the requirements of the proposed activities as they relate to “The Works” associated with the NOR alteration. This should include a reference to the reinstatement of the Station Plaza.
Monitoring of construction effects	Support in part	<p>The environmental monitoring of works are outlined in section 6 of the Construction Environmental Management Plan (CEMP).¹⁹ There is no reference to any specific transport or traffic related monitoring in the main CEMP report or the CTMP attached to the CEMP report.</p> <p>Given the range of existing transport activities and temporary construction activities that are proposed within a constrained and</p>	<ul style="list-style-type: none"> • To amend Designation 2501 conditions by including an additional condition setting out the requirements of the Construction Traffic Management Plan (CTMP) as they relate to “The

¹⁹ Britomart Transport Centre Notice of Requirement Alteration to Designation 2501, Assessment of Environmental Effects (Appendix D) Construction Environmental Management Plan, dated 25 June 2021, section 6

Issue	Position	Reasons	Recommendation sought from the Council
		<p>busy part of the City Centre network, active monitoring of the temporary construction activities is a prerequisite to ensure that adverse effects on the operation of the transport network are avoided and appropriately mitigated. This includes monitoring, reviewing and where required adjusting CTMP measures during the construction period.</p> <p>Auckland Transport request that a specific CTMP monitoring requirement is included as part of the proposed CTMP condition relating to "The Works."</p>	<p>Works" associated with the NOR alteration. This should include active monitoring of the effectiveness of the CTMP and based on this monitoring to implement any required changes to the CTMP in consultation with Auckland Transport.</p>