

TO Celia Davison, Manager Planning – Central/South

FROM Jimmy Zhang, Senior Policy Planner, Planning – Central/South

DATE 9 July 2025

SUBJECT **Update requested to the Auckland Unitary Plan
(Operative in Part 2016) (AUP)**



I request an update to the AUP as outlined below:

Reason for update	Section 181(3) Alteration to designation confirmed and RMA Section 182 Removal of designation confirmed
Chapter(s)	Chapter K Designations Transpower New Zealand Limited
Designation only	
Designation # 8517	Brownhill Road to Otahuhu Underground Electricity Transmission Cables (Transpower New Zealand Limited)
Locations:	227 Brownhill Road, Whitford to 26-28 Kaitawa Street, Ōtara.
Lapse Date	1 March 2040
Purpose	Electricity transmission - the construction, operation and maintenance of a double-circuit underground 220kV cable as part of the upper North Island Grid Upgrade Project, to convey electricity between the Otahuhu Substation and the substation site at Brownhill Road Substation, and ancillary activities.
Changes to text (shown in underline and strikethrough)	Please refer to Attachment C for text changes to existing designation.
Changes to diagrams	N/A
Changes to spatial data	Please refer to Attachment E that shows partial removal and alteration to designation.
Attachments	Attachment A: s181(3) and s182 request from Transpower Attachment B: Decision letter from Transpower Attachment C: Transpower New Zealand Limited Schedule and Designation 8517 Brownhill Road to Otahuhu Underground Electricity Transmission Cables conditions (strikethrough/underscore) Attachment D: Transpower New Zealand Limited Schedule and Designation 8517 Brownhill Road to Otahuhu Underground Electricity Transmission Cables conditions (clean) Attachment E: AUP GIS viewer (Before and After)

Maps prepared by: Rachel Joseph Geospatial Specialist	Text Entered by: Bronnie Styles Planning Technician
Signature: 	Signature: 
prepared by: Jimmy Zhang Senior Policy Planner	Reviewed by: Craig Cairncross Team Leader – Central South
Signature: 	Signature: 
Authorised by: Celia Davison Manager Planning – Central South	
Signature: 	

Attachments A
Transpower New Zealand Limited
S181 and s182 Request

Notice of requirement by Minister, local authority, or requiring authority for alteration of designation

[Sections 145, 168\(1\), \(2\), 168A, and 181, and clause 4 of Schedule 1,](#)
Resource Management Act 1991

To: Auckland Council

Transpower Limited gives notice of a requirement for an alteration to a designation for a project or work.

The site to which the requirement applies is as follows:

The Brownhill Road to Otahuhu Cable route located as shown in Appendix 2 of the attached AEE on land legally described as:

Lot 38 DP 122457
Lot 39 DP 122457
Lot 44 DP 122457
Section 2 SO 541424
Lot 45 DP 122457
Allot 355 PSH OF Manurewa
Reclaimed Crown Foreshore Survey Office Plan 47238
Lot 279 DP 50344
Part Lot 15 DP 9824
Lot 3 DP 484814
Lot 10 DP 507828
Lot 11 DP 507828
Lot 12 DP 507828
Lot 13 DP 507828
Lot 14 DP 507828
Lot 100 DP 511772
Lot 15 DP 500844
Lot 16 DP 500844
Lot 17 DP 500844
Lot 18 DP 500844
Lot 19 DP 500844
Lot 20 DP 500844
Lot 21 DP 500844
Lot 43 DP 500844
Lot 42 DP 500844
Lot 41 DP 500844
Lot 40 DP 500844
Lot 1 DP 436444
Lot 55 DP 353601
Lot 302 DP 486594
Lot 301 DP 486594
Lot 23 DP 486594

The nature of the proposed project is:
Described in section 2 of the attached AEE.

The nature of the proposed conditions that would apply are:
Discussed in section 7 of the attached AEE and shown in Appendix 9.

The effects that the project will have on the environment, and the ways in which any adverse effects will be mitigated, are:
Discussed in section 5 of the attached AEE.

Alternative sites, routes, and methods have been considered to the following extent:
Discussed in section 4 of the attached AEE.

The project and alteration are reasonably necessary for achieving the objectives of the requiring authority because:

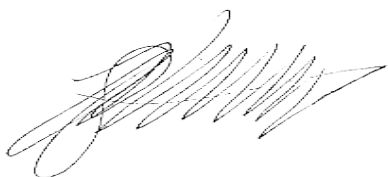
As the notice of requirement is for an alteration to an existing designation, the project has previously been determined to be reasonably necessary to achieve Transpower's objective. The proposed alteration will provide a more efficient route for the project.

Resource consents are likely to be needed for the proposed activity but have not been applied for because the project is some years away from being constructed,

The following consultation has been undertaken with parties that are likely to be affected:
Described in section 7 of the attached AEE.

Transpower New Zealand Limited attaches the following information required to be included in this notice by the district plan, regional plan, or any regulations made under the [Resource Management Act 1991](#).

Brownhill Road to Otahuhu Transmission Cable, Notice of Requirement for Alteration to Designation and Assessment of Environmental Effects and Appendices



John Sutherland
Senior Environmental Planner
TRANSPower NEW ZEALAND LIMITED

Signature of person giving notice
(or person authorised to sign on behalf of person giving notice)

Date: 4 October 2024

October 2024

Brownhill Road to Ōtāhuhu Transmission Cables Alteration to Designation

Prepared for

Transpower Limited



DINES
CONSULTING



REPORT INFORMATION		
© Dines Consulting Limited (2024)		
FINAL	Report date	4 October 2024
TRANSPower/DC017 Transpower Brownhill Road Otahuhu Cable Designation/AEE/October 2024 Final/BHL OTA Alteration AEE Final Oct 2024.docx		
Author:	Sharon Dines	

Contents

1.	Introduction	3
2.	Project Description	4
	2.1. Overview of Alteration to Designation	4
	2.2. Changes to Designation Route	4
	2.3. Construction Methodology	5
3.	Surrounding Environment	6
	3.1. Existing Designation Route	6
	3.2. Traffic Environment	6
	3.3. Three Waters Network	8
	3.4. Ecological Context and Values	9
	3.5. Archaeological Environment	14
4.	Alternatives Assessment	15
5.	Assessment of Environmental Effects	17
	5.1. Traffic Effects	17
	5.2. Effects on Three Waters Infrastructure	19
	5.3. Ecological Effects	19
	5.4. Archaeological Effects	20
	5.5. Other Effects	20
	5.6. Summary of Environmental Effects	20
6.	Statutory Assessment	21
7.	Consultation	22
8.	Designation Conditions	24
9.	Conclusion	25

Appendices

Appendix 1	Notice of Requirement
Appendix 2	Project Plans
Appendix 3	Archaeological Assessment
Appendix 4	Traffic Assessment
Appendix 5	Three Waters Assessment
Appendix 6	Ecological Assessment
Appendix 7	Noise Memorandum
Appendix 8	Consultation Documentation
Appendix 9	Proposed Designation Conditions

1. Introduction

Transpower NZ Limited (Transpower) serves notice of a requirement (NoR) under section 181(3) of the Resource Management Act 1991 (RMA) to alter Designation 8517 in the Auckland Unitary Plan – Operative in Part (AUP) for the Brownhill Road to Ōtāhuhu (BHL-OTA Designation) Underground Transmission Cables Designation (see Appendix 1).

Transpower is responsible for the National Grid, the national electricity transmission system which links generation facilities with the distribution network throughout the country. The National Grid must be developed, maintained and operated in a way that meets the needs of consumers who generally receive electricity supply through the distribution networks.

Transpower is the requiring authority in respect of the BHL-OTA Designation (shown on the Designation and Route Plans in Appendix 2). The purpose of the designation is:

‘the construction, operation and maintenance of a double-circuit underground 220kV cable as part of the upper North Island Grid Upgrade Project, to convey electricity between the Otahuhu Substation and the substation site at Brownhill Road, and ancillary activities.’

The cables have not yet been installed but Transpower holds easements, in perpetuity, over all privately-owned land along the designated route (easements have been relinquished over land that has subsequently become road).

As development in the area around the designation route has occurred since the designation was confirmed, it has become apparent that some minor changes to the designation route would be advantageous to better align the designation with the development pattern in the area (ideally, the designated route would follow roads).

This document provides:

- an overview of the alteration to the designation required;
- a description of the surrounding environment;
- an assessment of alternatives to the proposal for which this NoR is given;
- an assessment of the environmental effects of the proposal;
- an assessment of the proposal against the relevant statutory tests;
- a summary of consultation that has been undertaken as part of the project; and
- proposed amendments to designation conditions.

2. Project Description

2.1. Overview of Alteration to Designation

As discussed above, as development in the area around the designation route has occurred since the designation was confirmed, it has become apparent that some minor changes to the designation route would be advantageous to better align the designation with the development pattern in the area (ideally, the designated route would follow roads).

2.2. Changes to Designation Route

Designation 8517 was confirmed in 2009 as part of the North Island Grid Upgrade Programme (NIGUP). At that time, the land surrounding the designation route comprised rural and semi-rural land. Since 2009, urban development has progressed in the area including the construction of roads, schools, reserves, town centres and residential dwellings and other associated infrastructure. The AUP has also become operative in part. As a result, the development pattern of the area surrounding the route for designation 8517 is settled and either constructed or well signaled in the AUP.

Transpower has reviewed the designation route in light of the surrounding land development pattern and considers that some minor changes are warranted to better align the designation with the roading layout and avoid some areas where adverse environmental effects could occur during construction. These changes will make the construction, operation and maintenance of the cables more efficient.

The proposed changes to the designation route are shown in the Proposed BHL-OTA Designation Alteration Land Requirement Plans in Appendix 2.

The changes to the designation route will occur in two stages. The first stage is to alter the designation as a minor alteration under s.181(3) RMA to include new areas of land to be designated (shown in yellow on Figures 2 and 3). The second stage is to remove the designation in part under s.182 RMA from land where it is no longer required (shown in red on the Proposed BHL-OTA Designation Alteration Land Requirement Plans).

2.2.1. Stage 1: Additional Areas to Designation

The first additional area to the designation is to begin at the existing designation route at 359 East Tāmaki Road and follow East Tāmaki Road to its intersection with Accent Drive and then follow Accent Drive to the area within the vicinity of the intersection of Chapel Road and Stancombe Road (see pages 4-6 of the Proposed BHL-OTA Designation Alteration Land Requirement Plans).

The second additional area to the designation is to apply the route within the Stancombe Road corridor between its intersections with Chapel Road and Kensway Drive, alongside Barry Curtis Park (see pages 7-8 of the Proposed BHL-OTA Designation Alteration Land Requirement Plans).

2.2.2. Stage 2: Removal of Designation in Part

There are three parts of the designation that will be removed.

The first part of the designation to be removed is the area traversing the green space between East Tāmaki Road and the eastern end of Accent Drive (see pages 4-6 of the Proposed BHL-OTA Designation Alteration Land Requirement Plans).

The second part of the designation to be removed is alongside Stancombe Road so it is

no longer within Barry Curtis Park (see pages 6-8 of the Proposed BHL-OTA Designation Alteration Land Requirement Plans).

The third part of the designation to be removed is a very minor reduction to the width of the designation along Kitenga Road to align the designation boundary with the road reserve boundary. With recent updates to the accuracy of GIS technology, the designation boundary can be more accurately mapped and Transpower has determined that the designation boundary on Kitenga Road is shown on some private properties where it has always intended to be located in the road reserve (see pages 11 and 12 of the Proposed BHL-OTA Designation Alteration Land Requirement Plans).

2.3. Construction Methodology

The construction methodology for the proposed development will be generally as described in the original NoR document 'Transpower New Zealand Ltd; North Island Grid Upgrade Project; Notices of Requirement Documentation, Part X, Section 17: Traffic and Transport Effects (MWH, 2007)'. However, the layout of the cable arrangement is proposed to change in line with current best practice. Instead of a triangle/pyramid arrangement within the trench, the cable layout will be changed to a flat formation as shown in the Typical Trench Drawing in Appendix 2.

All works will comply with the National Code of Practice for Utility Operators' Access to Transport Corridors under the Utilities Access Act 2010 in accordance with proposed amended Condition 18 of the NoR (discussed in section 8 of this document).

3. Surrounding Environment

3.1. Existing Designation Route

Designation 8517 links the Ōtāhuhu Substation on Gridco Road, Ōtara (Designation 8513¹) with the Brownhill Substation site to the east (Designation 8515²).

From the Ōtāhuhu Substation designation 8517 traverses Gilbert Road, Alexander Crescent and Franklyne Road before crossing the Ōtara Creek Reserve and the Ōtara Creek to then traverse Johnstones Road to its intersection with Springs Road where the designation route crosses Springs Road and traverses East Tāmaki Road up until it reaches 359 East Tāmaki Road. At this point, the existing designation route turns south east crossing Te Puke o Tara Sports Park and the adjacent reserve and the Sancta Maria stormwater ponds. The designation rejoins the road on the southern portion of Accent Drive before crossing the intersection with Chapel Road and traversing Barry Curtis Park parallel to but south of Stancombe Road, until it reaches the intersection of Stancombe Road and Kensway Drive where it traverses Stancombe Road. The designation continues along Stancombe Road, which becomes Jeffs Road. The designation continues following Jeffs Road until just east of the intersection of Jeffs Road and Portofina Place where it traverses rural land before joining Ormiston Road and then Kitenga Road, Regis Lane and Spring Hill Road, which is only partially formed. Designation 8517 then intersects with Designation 8515 for the Brownhill Substation.

In the west, the designation traverses primarily suburban residential areas interspersed with commercial/industrial areas and reserves including Te Puke o Tara Sports Park and Barry Curtis Park which are large recreational areas. The designation passes Sancta Maria Catholic College and Mission Heights Junior College. At the eastern end of the designation, the designation traverses land that is in the process of being developed for residential or rural residential purposes until it reaches the Brownhill Substation in a primarily rural environment.

3.2. Traffic Environment

Tonkin & Taylor have prepared the report titled *Brownhill to Otahuhu - Proposed Alteration to Designation: Traffic Assessment* which is attached to this report in Appendix 4. This report assessed the effects of the proposed designation alteration on the roading network in the vicinity. The roading network within the area of the designation alteration as described by Tonkin & Taylor is detailed below.

3.2.1. East Tāmaki Road from no. 322 to Accent Drive

In this 590m length of road east of number 322 East Tāmaki Road is a 2-lane, 2-way regional arterial route which is between 9.5m and 11m wide. It is undeveloped semi-rural in nature for much of its length (despite being surrounded by an industrial area), with wide grassed berms and no kerb and channel until around 100m from the intersection with Accent Drive. At this point the carriageway widens to over 14m between kerb faces. The road reserve is of the order of 22m wide. East Tāmaki Road

¹ The purpose of designation 8513 is Electricity transmission – the operation, maintenance and upgrade of the existing Otahuhu Substation, the construction of a new 220kV substation, installation of 220kV underground cable circuits and associated works as part of the upper North Island Grid Upgrade Project, works associated with other projects and ancillary activities.

² Electricity transmission- the construction, operation and maintenance of a transition station to connect the underground cable and overhead lines section of the upper North Island Grid Upgrade Project, including Tower 5 of the overhead line and additional support structures, and parts of the underground cables connecting with Pakuranga and Otahuhu Substations. Other works included in the designation on a staged basis are a 220 kV Gas-Insulated Switchgear (GIS) switching station and a 400kV GIS substation and associated works as part of the upper North Island Grid Upgrade Project, and ancillary activities.

has a posted speed of 60 km/h and carries moderate traffic flows (~5,500 vehicles per day (VPD)) of mainly through-traffic.

3.2.2. Accent Drive from East Tāmaki Road to Te Irirangi Drive

In this 500m length of road, Accent Drive from East Tāmaki Road to Te Irirangi Drive is a 2-lane, 2-way arterial route with a flush median. This section of the road serves a light industrial area with three cul-de-sac roads that service industrial properties. The road has kerb and channel with footpaths and grass berms both sides and has a carriage way width of approximately 12m between kerb faces. The intersections at each end of this section widen to over 25m between kerb faces at the throats. The road reserve is approximately 26m wide. The intersections at each end of this section have a left turn slip lane. This section of Accent Drive has a posted speed of 60 km/h and carries significant traffic flows (~9,100 VPD) which is a combination of through-traffic and vehicles servicing the adjacent industrial sites.

3.2.3. Crossing Te Irirangi Drive

In this 35m section of road, Te Irirangi Drive is a very busy regional arterial road with average daily traffic of approximately 31,700 VPD. It has two lanes in each direction with a wide raised central median. The width of the carriageway at the intersection is approximately 35m. Te Irirangi Drive has a posted speed of 80 km/h in both directions. The intersection with Accent Drive is signalised, with left turn slip lanes in all directions. Two southbound lanes from Te Irirangi Drive are dedicated to right turn into Accent Drive westbound, indicating that a considerable volume of traffic turning into Accent Drive comes from this direction.

3.2.4. Accent Drive from Te Irirangi Drive to Chapel Road

In this 520m length of road, Accent Drive from Te Irirangi Drive to Chapel Road is a 4-lane, 2-way arterial route with a flush median. This section of the road serves a residential area and recreation reserves along its length. The road has kerb and channel with footpaths and grass berms on both sides and a carriageway width of approximately 15m between kerb faces. There is a combination of yellow “No Stopping At All Times” (NSAAT) markings on both sides with some sections that have direct access for residential properties reducing to single lane with designated shoulder parking. A dozen or so properties have direct access onto the road, with a large number being accessed by three local roads – Wayne Francis Drive, Siedeberg Drive and Savona Drive.

The intersections at each end of this section widen to over 25m between kerb faces at the throats. The road reserve is approximately 27m wide. The intersections at each end of this section have left turn slip lanes.

This section of Accent Drive has a posted speed of 60 km/h and carries significant traffic flows (~12,300 VPD) which is a combination of through-traffic and vehicles accessing residential properties.

3.2.5. Stancombe Road from Chapel Road to Kensway Drive

In this 770m length of road, Stancombe Road is an arterial road with a specified minimum carriageway width of 16m. This section is a 2 lane, 2-way road with kerb and channel both sides and a flush median (a few small sections have a raised median) with formalised shoulder parking and a painted cycle lane either side for most of its length. It services residential properties and the Fo Guang Shan Buddhist Temple on the north side, with a large recreational reserve (Barry Curtis Park) on the south side.

3.3. Three Waters Network

Tonkin & Taylor have prepared the report titled *Brownhill to Otahuhu – Proposed Designation Alteration* which is attached to this report in Appendix 5. This report assessed the effects of the designation alteration on the three waters assets that are located within the proposed designation route.

The three waters network within the area of the designation alteration as described by Tonkin & Taylor is detailed below.

Tonkin & Taylor advise that three waters infrastructure is generally expected to be located 1-3m below the road carriageway in the public road reserve, depending on the size of the pipeline. They also indicate that there are Code of Practice standards for pipeline cover as set out in Table 1.

Table 1. Code of Practice standards for pipeline cover.

Pipe	Minimum cover	Maximum cover
Wastewater Pipelines		
	900mm	N/a
A graded wastewater pipeline connection in the road reserve	450mm at the highest point	N/a
Water supply pipelines		
In carriageways	900mm	1,200mm
In berms	600mm	900mm
Stormwater pipelines		
	1,000mm	N/a

3.3.1. East Tāmaki Road from no. 322 to Accent Drive

No transmission network water pipelines will be crossed along this section of the route, however two local network 200mm diameter lines lie across the road corridor and will be crossed by the designation. The transmission cables will also be laid alongside several other local network lines which may be crossed depending on where in the road corridor the transmission cables are laid.

The revised route crosses a 1,200mm diameter wastewater transmission network pipeline. Two local network wastewater pipelines lie perpendicular to the road corridor and will be crossed with another local network line running alongside the road corridor.

There are several public stormwater pipes laid along the East Tāmaki Road alignment and crossing the road reserve. There are also catchpit connections to stormwater manholes.

3.3.2. Accent Drive from East Tāmaki Road to Te Irirangi Drive

No transmission network water pipelines will be crossed. However, four local network lines up to 300mm in diameter lie across the road corridor. The transmission cables will also be laid alongside several other local network lines which may be crossed depending on where in the road corridor the transmission cables are laid.

No transmission network wastewater pipelines will be crossed. However, two 150mm diameter local network wastewater pipelines lie across the road corridor where the transmission cables are to be laid.

There are several public stormwater pipes laid along the Accent Drive to Te Irirangi Drive alignment and crossing the road reserve. There are also catchpit connections to stormwater manholes.

3.3.3. Crossing Te Irirangi Drive

No transmission network water pipelines will be crossed. One local network wastewater pipeline lies across the road corridor and one stormwater pipe lies across the road reserve. There are also catchpit connections to stormwater manholes.

3.3.4. Accent Drive from Te Irirangi Drive to Chapel Road

No transmission network water pipelines will be crossed. Two local network 150mm diameter water lines lie perpendicular to the road corridor and will be crossed. The transmission cables will also be laid alongside several other local network lines which may be crossed depending on where in the road corridor the transmission cables are laid.

The proposed designation crosses an upper tributary stream of Ōtara Creek public lined stormwater channel between Siedeberg Drive and Savona Drive, with two 225mm diameter stormwater pipes crossing the road reserve at the same location. There are several stormwater pipes along the Accent Drive alignment from Te Irirangi Drive to Chapel Road. Several stormwater pipes cross the road reserve. There are also catch pit connections to stormwater manholes.

3.3.5. Stancombe Road from Chapel Road to Kensway Drive

No transmission network water pipelines will be crossed. One local network line lies perpendicular to the road corridor and will be crossed. The transmission cables will also be laid alongside several other local network lines which may be crossed depending on where in the road corridor the transmission cables are laid.

No transmission network wastewater pipelines will be crossed. Two local network wastewater pipelines lie perpendicular to the road corridor and will be crossed. The transmission cables will also be laid alongside several other local network lines which may be crossed depending on where in the road corridor the transmission cables are laid.

There are several public stormwater pipes laid along the Stancombe Road alignment and that cross the road reserve. There are also catch pit connections to stormwater manholes.

3.4. Ecological Context and Values

Boffa Miskell Limited (Boffa Miskell) have prepared a report titled *BHL-OTA Cable Designation Change Assessment of Ecological Effects* which is attached to this report in Appendix 6. The report assesses the ecological effects of the proposed alteration to the designation. Below is a description of the ecological context and values of the area as described by Boffa Miskell.

3.4.1. Terrestrial Values

The existing designation route and the proposed changes to it are located within the Tāmaki Ecological District, extending into Hunua Ecological District as it traverses rural land towards Whitford. It is between large estuarine inlets draining to the Manukau Harbour to the west and the Waitemātā Harbour to the north. Tāmaki Ecological District's original lowland forest cover has been almost entirely removed from the isthmus and freshwater, riparian estuarine and coastal environment are the primary natural ecological features remaining.

The AUP Significant Ecological Areas (SEA) overlay does not cover any parts of either the existing or proposed designation route, however we note that the SEA overlay includes a section of Ōtara Creek tributary upstream of the site. Schedule 3 of the AUP (Significant Ecological Areas – Terrestrial) notes that this area meets Factor 2 (threat status and rarity).

The existing designation intersects an area of revegetated corridor approximately 85-150m wide along a tributary of Ōtara Creek bounded by commercial development to the north and south. Historically, this land was used for agriculture though patches of kanuka scrub were present. By 2006, however, almost no woody vegetation remained. Revegetation of the land surrounding the Ōtara Creek tributary occurred after 2011 and extensive portions were well established by 2016, indicating the vegetation is between 10-13 years old. Vegetation on land surrounding the stream corridor comprises dense kanuka scrub 4m – 6m tall, with minimal understorey other than local patches of ponga and ground ferns (*Histioglossis incisa*). Willow weed dominates broad, marshy riparian terraces within the active floodplain of the stream, interspersed with clumps of flax, giant umbrella sedge and Carex species (*C. lesssoniana*, *C. secta*).

Recent (estimated 3-year-old) plantings have been established on low-lying land adjacent to the existing revegetated corridor, south of Te Puke o Tara Sports Park, comprising manuka, cabbage trees and sedges. Rushes (*Juncus* spp) and buttercup dominate the ground cover.

East of Te Irirangi Drive, the existing designation route overlies the channel of the Ōtara Creek tributary and the southern margin of the Sancta Maria stormwater ponds, which were constructed around 2003 with plantings established around the natural stream corridor and constructed pond in approximately 2005. Kanuka dominates the woody canopy, interspersed with a variety of secondary native forest species (karaka, totara, titoki, lemonwood, cabbage trees, etc). Vegetation around the active floodplain mainly comprises aquatic and wet tolerant herbs (willow weed, buttercup, etc) that have spontaneously established, though patches of native sedges (mainly *Carex lesssoniana*, *C. secta*) indicate that some riparian planting was established in floodplains. Outflow from the stormwater ponds into the natural stream has formed expanses of wetland adjacent to the main channel, and these are also vegetated in willow weed and buttercup with scattered native sedges.

A large, three-sided stormwater pond within an area of grassed reserve is surrounded by a well-established buffer of native scrub that extends to the water's edge on two sides. There is a narrow fringe of sedges and mown grassland on the eastern side adjacent to Accent Drive.

The section of the existing designation through rural land between Jeffs Road and Ormiston Road traverses a mature stand of mainly exotic (pine and eucalyptus) and an area of rough pasture.

Where the designation route is proposed to be moved to, the road corridor contains scattered individual deciduous exotic and small titoki street trees. These are mainly located along Accent Drive. In addition, the proposed alignment along Ormiston Road is situated with a cutting, vegetated in rank grass which clumps of pampas, gorse, agapanthus, patches of low kanuka and scrubby regenerating pines. Shelter belts of taller exotic trees are present along the crest of the bank of the cutting.

Riparian terraces dominated by willow weed species (*Persicaria decipiens*, OBL and *P. hydropiper*, FACW) within the existing designation corridor overlying Ōtara Creek tributary and Sancta Maria Reserve were confirmed by Boffa Miskell as natural inland wetlands using the Ministry for the Environment 'rapid assessment' tool in the wetland delineation protocols (Ministry for the Environment, 2022).

Areas of willow weed, buttercup and sedges adjacent to outfalls from the stormwater

ponds also qualify as wetlands under the RMA but are excluded from the definition of a natural inland wetland in the National Policy Statement for Freshwater Management (NPS-FM) under clause (c), as they developed "*in or around a deliberately constructed water body, since the construction of the water body*".

3.4.2. Freshwater Values

The Ōtara Creek tributary is an urban stream that traverses a mixture of residential and rural land in Upper Flat Bush and Whitford, through industrial and residential land in East Tāmaki and Ōtara, and into the estuarine reaches of lower Ōtara stream, which discharges to the Tāmaki Estuary. The reach of the Ōtara Creek tributary between Te Puke o Tara Sports Park and Te Irirangi Drive is identified as a Wai Care community restoration site on Auckland Council's Geomaps.

The existing alignment crosses Ōtara Creek tributary and its revegetated riparian margins in several locations between East Tāmaki Road and Accent Drive as the watercourse follows a meandering route through the undeveloped corridor within an otherwise urbanised area.

New Zealand Freshwater Fish Database (NZFFD) contains numerous records for banded kokopu (*Galaxias fasciatus*) and shortfin eel (*Anguilla australis*) - both native freshwater fish species – in the Ōtara Creek tributary. Eels and banded kokopu are both diadromous species (i.e. they travel between marine and freshwater environments to complete their life cycle) hence the reach of stream in question is an important migratory corridor for these populations. A single record of common bully *Gobiomorphus cotidianus* has also been reported for the tributary. All three species are listed as "Not Threatened." Signage along the walking track through the planted areas indicates that giant kokopu (*Galaxias argenteus*) – an At-Risk – Declining species – has been sighted in the watercourse.

Auckland Council undertakes water quality monitoring in Ōtara Creek approximately 3km from the Tāmaki Estuary. Macroinvertebrate Community Index (MCI) scores are low but show a general trend of gradual improvement since monitoring commenced in 2002, though the Macroinvertebrate Average Score Per Metric (ASPM) showed no significant change. *E.Coli* and turbidity measurements show poor but improving results, relative to other urban sites while nutrient levels are moderate but improving and generally within the best 25-50% of lowland urban sites assessed.

These improvements are likely to be associated with the progressive land use change throughout the catchment from pastoral farmland to residential land, and riparian revegetation within esplanade reserves that has resulted in near continuous riparian cover of the northern Ōtara Creek tributaries from headwaters to estuarine reaches.

The Sancta Maria stormwater ponds have no notable aquatic ecological values, other than their functional value in maintaining and improving water quality for the receiving environment.

NZFFD records report grass carp in the main stormwater pond. Boffa Miskell consider that the wetland areas surrounding stormwater outlets are likely to provide favourable habitat for shortfin eel.

3.4.3. Terrestrial Fauna Values

The Department of Conservation (DOC) bat database was searched for recorded instances of bats close to the designation route over the past 20 years. The closest observations are a single record in 2000 from the Mangemangeroa Reserve, approximately 3km from the designation route and a 2014 record of a single long-tailed bat pass at Redoubt Road, 5km from the route. In addition, in 2014, several long-tailed bat passes were recorded at Clevedon Reserve, 12km east of the designation route.

Although the revegetated stream corridor of the Ōtara Creek tributary doesn't contain mature trees suitable for maternity roosts, individual bats can travel up to 50km when foraging at night and are often detected in unlikely places. Long-tailed bats favour bodies of open water with tall vegetation around the margins. They typically avoid urban environments but have been known to use well-vegetated stream corridors as flyways for foraging and commuting between feeding sites. It is therefore possible that long-tailed bats from the Hunua Ranges traverse the site at least occasionally during foraging excursions.

It is unlikely that the mature exotic trees between Jeffs Road and Ormiston Road are within an area of core bat habitat, these trees may offer suitable habitat for incidental solitary roosting as the site is in the headwaters of several well vegetated tributaries which bats may use for foraging.

Roadside amenity trees along the proposed designation route are unlikely to be used by bats, as they are isolated, widely spaced, and within a busy urban environment. Bats may use tall trees on the crest of the embankment adjacent to Ormiston Road along the proposed designation corridor, but these are unlikely to be affected by works that would be expected in the corridor.

Auckland Council and DOC databases were searched for lizard records within a 20km radius of the site. Native lizard species detected in the area include forest gecko *Mokopirirakau granulatus*, elegant gecko *Nautilinus elegans*, ornate skink *Oligosoma ornatum* and copper skink *Oligosoma aeneum*, (all classified as 'At Risk-Declining') though no observations were from the project area itself. The closest record is from 2013, when a dead forest gecko was found in the vicinity of Ti Rakau Drive (within 1km of the existing designation route).

The likelihood of arboreal geckos persisting on the site for many years in the absence of woody vegetation cover is low. However, there is a reasonable likelihood that skinks (particularly copper skink) are present, as the site transitioned directly from agricultural land use (with patches of scrub and rank grassland around riparian margins) to revegetated kanuka scrub, with substantial areas of rank grassland retained around waterways.

Rank grassland beneath fence lines and around the margins of vegetation patches between Jeffs Road and Ormiston Road may provide local refuges for native skinks (most likely copper skink).

Rank grass and shrubby cover on the roadside embankment along Ormiston Road offers potential habitat for native lizards, though as the vegetation established following construction of the road, it is unlikely that a population occurs here. Otherwise, no suitable habitat for native lizards is present within the proposed designation route.

'Bird Atlas' records for the 1 km grid square around the Ōtara Creek tributary/ Sancta Maria Ponds (see Table 2) are used as an indication of the avifauna community present in the vicinity of the BHL-OTA designation.

Table 2. 'Bird Atlas' records of species observed within 1 km of Sancta Maria Ponds (excluding strictly coastal species. Source: eBird, accessed May 2023.

Common name	Species name
New Zealand Dabchick	<i>Poliocephalus rufopectus</i>
Australasian Gannet	<i>Morus serrator</i>
Black Shag	<i>Phalacrocorax carbo novaehollandiae</i>
Pied Shag	<i>Phalacrocorax varius varius</i>
Little Black Shag	<i>Phalacrocorax sulcirostris</i>
Little Shag	<i>Phalacrocorax melanoleucos brevirostris</i>
White-faced Heron	<i>Egretta novaehollandiae</i>
Royal Spoonbill	<i>Platalea regia</i>
Black Swan	<i>Cygnus atratus</i>
Paradise Shelduck	<i>Tadorna variegata</i>
Grey Duck	<i>Anas s. superciliosa</i>
Grey Teal	<i>Anas gracilis</i>
New Zealand Shoveler	<i>Anas rhynchotis variegata</i>
New Zealand Scaup	<i>Aythya novaeseelandiae</i>
Australasian Harrier	<i>Circus approximans</i>
Pukeko	<i>Porphyrio m. melanotus</i>
Australian Coot	<i>Fulica atra australis</i>
South Island Pied Oystercatcher	<i>Haematopus finschi</i>
Variable Oystercatcher	<i>Haematopus unicolor</i>
Spur-winged Plover	<i>Vanellus miles novaehollandiae</i>
Southern Black-backed Gull	<i>Larus d. dominicanus</i>
Red-billed Gull	<i>Larus novaehollandiae scopulinus</i>
Black-billed Gull	<i>Larus bulleri</i>
New Zealand Pigeon	<i>Hemiphaga novaeseelandiae</i>
Shining Cuckoo	<i>Chrysococcyx l. lucidus</i>
Morepork	<i>Ninox n. novaeseelandiae</i>
New Zealand Kingfisher	<i>Todiramphus sanctus vagans</i>
Welcome Swallow	<i>Hirundo n. neoxena</i>
Grey Warbler	<i>Gerygone igata</i>
New Zealand Fantail (North Island ssp)	<i>Rhipidura fuliginosa placabilis</i>
Silvereye	<i>Zosterops lateralis lateralis</i>
Tui	<i>Prosthemadera n. novaeseelandiae</i>

A number of species recorded in the area are characteristic of coastal habitats, due to the proximity of the area of interest to the Manukau and Waitematā Harbours and their estuarine inlets. Species which are unlikely to use ecological features identified along the existing or proposed designation routes, such as banded dotterel, wrybill, lesser knot, were not included in Table 2. However, the presence of the stormwater ponds will attract species that favour open water bodies with adjacent vegetation. The adjacent Barry Curtis Park, which (like Sancta Maria ponds) has areas of open water that are surrounded by well-established riparian planting, is a popular site for recreational bird watching, and eBird observations from Barry Curtis Park include a number of coastal and wetland birds of conservation interest (O'Donnell et al., 2023). In particular, dabchick (Threatened – Nationally Increasing) and several shag species (all At Risk – recovering or At Risk – relict) have been recorded and are likely to frequent the Sancta Maria Ponds. A pied shag was observed in the main pond during the site walkover. Waterfowl (and possibly shags) will also use the Ōtara Creek tributary and surrounding vegetation.

Forest bird species from surrounding areas where bird records have been compiled indicate a typical assemblage of common native and exotic species. Kaka (At Risk – Recovering) have been recently recorded in Totara Park, and may incidentally use well established scrub and tall trees.

3.5. Archaeological Environment

CFG Heritage undertook an archaeological assessment of the proposed designation alteration (see Appendix 3) and advised that a number of previous assessments have been undertaken in the area to assess the effects of the original designation and a range of other projects in the area.

Results from archaeological investigations on the banks of the Tāmaki River indicate that humans were in the area in the 16th and 17th centuries AD which is similar to dates for surrounding areas. The original site of the Goodfellow's Homestead (archaeological site R11/3227) is 250m from the Ōtara portion of the original designation.

The East Tāmaki Road portion of the new designation runs between a number of archaeological sites. R11/2333, R11/1524 and R11/2461 are all related to the occupation of Smales Farm, now Hampton Park, St Johns Church (also scheduled in the AUP ID 1343, Historic Heritage Schedule Category A*) and Te Puke o Tara Sports park.

Hampton Park was assessed in 2001, at which time several archaeological features were identified, including drystone walls along the edge of the designation (R11/2461). The 2001 assessment noted that the drystone walls are an integral part of the park's history and recommended that they be restored and maintained. Pre-European Māori sites related to the occupation of nearby Te Puke o Tara were also assessed, including R11/1616 (midden) and R11/2460 (pit and terrace site).

There are 5 archaeological sites within 100 m of the Stancombe Road part of designation. Two sites are recorded inside Barry Curtis Park, to the south of the designation. Midden R11/2323 was discovered during earthworks associated with the construction of the park but could not be identified during later investigations. Urupā R11/1933 was identified during a survey by Clough and Prince in 1997, who stated that the likelihood of further archaeological evidence related to the sites being present was low. Directly across the road from this park is the former site of the Stancombe cottage (R11/2554) and a church cemetery (R11/2440).

During a site visit to assess the new areas to be designated, the only area of archaeological interest were drystone walls associated with Smales Farm (R11/2461) on the north side of East Tāmaki Road. These walls are in varying condition - sections at 322 East Tāmaki Road have collapsed leaving only the base however the wall is in better condition at 282 East Tāmaki Road.

At the eastern edge of the Stancombe Road, along the front of a drainage reserve, a gorse hedge is recorded (R11/2154), however this could not be identified during the field survey and is assumed to be destroyed.

4. Alternatives Assessment

In relation to designations, section 171(1)(b) of the RMA requires that:

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—

...

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;*

...

While this NoR is for a minor alteration to the designation under section 181(3) of the RMA, the environmental effects of the proposal are not significant and section 181(3) states that section 171 of the RMA does not apply to a minor alteration, Transpower has considered alternatives for the project. This is because, since the NoR for the designation was given in 2007 and subsequently confirmed in September 2009, the environment surrounding the route for designation 8517 has changed significantly. In 2007, the area was open rural or semi-rural land which has subsequently been developed for urban use: roads, water infrastructure, schools and parks have been constructed together with extensive areas of residential housing and commercial buildings. Where land is still undeveloped, zoning is formalised in the AUP.

Transpower has taken the opportunity to review the designated route now that the development pattern for the area is either in place or settled. Following this review Transpower proposed changes to the designation route to reduce environmental effects, further minimise disruption to the new urban land use of the area and improve the ease with which the cable can be constructed, thereby increasing efficiency.

The designation route is to be moved from traversing the green space between East Tāmaki Road and the eastern end of Accent Drive to a route that instead continues to follow East Tāmaki Road to its intersection with Accent Drive and then follows Accent Drive to the area within the vicinity of the intersection of Chapel Road and Stancombe Road. While the proposed change will make the cable longer, the route will enable a simpler construction methodology. The proposed route change is the shortest on-road route possible.

While the change to the route in this location will result in additional disruption to the road network at the time of construction, it will:

- avoid construction activities within an extensive area of stream and related green stormwater infrastructure, avoiding the need to disturb these areas of ecological value or obtain resource consents under the National Environmental Standard for Freshwater for construction activities in this area of the designation;
- avoid construction in the vicinity of extensive three waters infrastructure;
- avoid traversing the currently undeveloped land south east of East Tāmaki Road and west of Kordel Place, which Transpower understands is proposed to be developed as hardstand playing surfaces. Avoiding this area will reduce disruption to the recreational use of the playing surfaces during cable construction;
- avoid construction activities in close proximity to the commercial properties on the northern side of Bishop Dunn Place.

Transpower did consider an alternative sub-route that traversed Te Irirangi Drive and the Santa Maria College playing fields between Te Irirangi Drive and Chapel Road instead of Accent Drive, however this alternative would disrupt the operation of a school and its recreational facilities during construction as well as more of the busier Te Irirangi Road. It would also involve the use of private property.

A further change to the designation is to move the route alongside Stancombe Road to align it within the Stancombe Road corridor, rather than locate it within Barry Curtis Park. The development of Barry Curtis Park has resulted in the development of recreational facilities within the designation route that will be disrupted during the construction of the cables. Locating the cables in the road will comply with the "National Code of Practice for Utility Operators' Access to Transport Corridors", specifically "placing bulk Utility Structures beneath the Carriageway outside of wheel track alignments in urban areas (to free Berm space for other Utility Structures)". This CoP was developed in 2015 after Designation 8517 was secured and has subsequently been reviewed and amended in 2016 and 2018. In addition, the impact of the designation route on local network cabling will be easier to manage with the route located in the road corridor. Finally, Transpower does not need to secure easements over private land if the designation is located on public road. This reduces cost and time delays for cabling projects, thereby reducing costs that would be ultimately passed on to the NZ electricity consumer and improving efficiency.

An amendment to the designation route was initially proposed to move the route from Jeffs Road to Valderama Drive, Argento Avenue, Wallen Road and additional length of Ormiston Road. This change was assessed because geotechnical investigations undertaken following confirmation of the designation indicate the eastern end of existing designation traverses a steep and unstable area of land. After further design and costing work was commissioned to compare cable construction along the unstable area with cable construction via the longer Valderama Drive – Ormiston Road route, it was determined that the cable designation should remain in the existing location in the vicinity of Jeffs Road.

The route selected is the shortest available while maximising use of the road network. An alternative traversing Murphy's Road and a greater extent of Ormiston Road was also considered but was discounted because Murphys and Ormiston Roads carry larger traffic volumes and there is considerable infrastructure already in place under Murphys and Ormiston Roads so the underground space is congested. As a result of these two factors, construction would pose greater disruption to network operators during construction, more comprehensive traffic management measures and additional health and safety risks than the alternative selected.

5. Assessment of Environmental Effects

5.1. Traffic Effects

Tonkin & Taylor have undertaken a detailed assessment of traffic effects in each of the sections of the proposed designation corridor described in section 3.2 and proposed mitigation measures where these are needed. The effects and proposed mitigation measures are summarised below.

5.1.1. East Tāmaki Road from no. 322 to Accent Drive

During active construction, the works within the designation will require 6m of road width so there will be insufficient carriageway to allow two lanes of traffic during construction without mitigation measures. As there are no scheduled bus services along this section of East Tāmaki Road bus services will not be affected. There are several accesses to industrial and commercial properties along East Tāmaki Road together with a church and one residential property. Informal roadside parking is currently available on both sides of the road generally on the road berms and shoulders.

Without management, access to properties will be restricted and parking will be prohibited within the works zone and 100 metres either side of it during construction.

5.1.2. Accent Drive from East Tāmaki Road to Te Iirangi Drive

During active construction there will be between 5.5 and 10 m of carriageway available for vehicles to pass. This is sufficient to facilitate two-way traffic during construction without the need for temporary traffic signals, stop/go controls or localised temporary widening to accommodate traffic flows. Accent Drive is served by the 352 bus which is a weekday, peak period only service with one bus stop on each side of the road in this section. Accent Drive contains three no-exit access roads and a number of direct accessways from the road which serve adjacent industrial properties. There is non-formalised roadside parking on both sides of the road.

Access to properties, bus stops and parking will be restricted during construction periods and mitigation measures will be required.

5.1.3. Crossing Te Iirangi Drive

Construction activities in the intersection could result in significant traffic congestion from lane closures and temporarily reduced speed limits leading to extensive queuing along the length of the road in both north and southbound directions. Due to the highway-like nature of Te Iirangi Drive, there are limited intersections meaning that potential diversion options are about 1km away in either direction. The 352 bus service (weekday, peak period only) makes a left turn from Te Iirangi Drive onto Accent Drive. Due to the peak period only nature of this service, the works will have minimal impact however some services may take longer.

5.1.4. Accent Drive from Te Iirangi Drive to Chapel Road

During active construction within the designation there will be approximately 10 metres of carriageway available for vehicles to pass. This is sufficient to ensure two way traffic without the need for temporary traffic signals, stop/go controls or localised temporary widening to accommodate traffic flows. As there are no scheduled bus services on this road, there will be no effects on buses. There are significant numbers of residential properties accessed via Accent Drive and the local roads. All will have alternative entry points onto Te Iirangi Drive or Chapel Road. The minimal informal roadside parking will not be available within the works zone and for 100m on either side during construction.

5.1.5. Stancombe Road from Chapel Road to Kensway Drive

During active construction there will be approximately 10 metres of carriageway available for vehicles to pass the works, while during passive construction periods, 13 metres of carriageway will be available. Road widths during both active and passive construction will be sufficient to accommodate two-way traffic flows without the need for temporary traffic signals, stop/go controls or localized temporary widening to accommodate traffic flows. The 739, 35 and 355 buses use this section of Stancombe Road with the 35 being a frequent service. There are a number of residential properties, a Buddhist temple and Barry Curtis Park which all have accesses that will be affected by the proposed construction works however alternative access points or routes are available. As Barry Curtis Park is a large regional sports facility that hosts school sports and tournaments, these may be affected by the works along this section of road at times.

Formal and informal roadside parking exists on both side of Stancombe Road in this location. Parking in these areas will be prohibited during construction in the vicinity and within 100m on either side of the works zone.

A range of alternative arterial routes are also available so traffic effects are expected to be very localized and the reduction in capacity for through traffic will be minor overall. Access to properties, bus stops and parking will be restricted during construction periods and mitigation measures will be required.

5.1.6. Mitigation Measures

Tonkin & Taylor propose the following general and specific mitigation measures:

- Scheduling work to minimise disruption during active construction periods;
- Scheduling works adjacent to the Mission Heights Junior College during school holiday periods or outside school pick up and drop off times.
- Scheduling work on the Te Irirangi Drive crossing in off peak periods only, including at night;
- Use of temporary traffic controls, stop/go controls or temporary traffic signals to accommodate traffic where necessary;
- Local detours via adjacent roads while intersections or roads are closed during active construction periods. In particular, advertise and encourage route diversions around the Te Irirangi Drive crossing to enable drivers to change their route early to avoid the intersection;
- Prohibit parking within active works zones and within 100m either side;
- Install plating over the trench to facilitate access during passive construction periods;
- Use information boards providing advance notification of works start date and expected duration;
- Liaison with bus operators to arrange temporary closure and/or relocation of bus stops and modifications to timetables (due to reduced speed limits) and development and implementation of a communications plan for bus users;
- Liaison with schools and sports clubs that use Barry Curtis Park to notify them in advance of proposed construction works and disruptions to Stancombe Road and preferably avoid works occurring during any large tournaments or events at the Park;

- Consultation, including mail drops and social media communications, with affected industrial and commercial sites, residents and schools prior to works being scheduled to determine most suitable times to undertake works and provision of alternative access arrangements where necessary;
- Communication with users of roadside parking prior to the works occurring where parking is affected;
- Compliance with traffic safety and safe management on the road guidelines in accordance with the Code of Practice for Temporary Traffic Management (COPTTM);
- Planning and co-ordinating the works progressively with Fire and Emergency New Zealand to ensure that access for emergency services is maintained.

Tonkin & Taylor conclude that the effects on the transport network along the altered route will be similar to those in the original NoR for the BHL-OTA cable. Tonkin & Taylor's proposed mitigations comply with the revised designation conditions (see section 8 and Appendix 9) and take into account the unique circumstances of each location along the revised route.

5.2. Effects on Three Waters Infrastructure

Tonkin & Taylor consider that existing conditions 6-8 and 10-11 of designation 8517 are appropriate for planning the design, management, construction, operation and maintenance of new electricity transmission works within the designation in relation to existing three waters infrastructure. The conditions require Transpower to engage and consult with the utility operators to ensure safe installation and operation of the new transmission works in the vicinity of the existing utility infrastructure.

Accordingly, we consider that the change in effects of the alteration to the route for the designation on three waters infrastructure are no more than minor.

5.3. Ecological Effects

Boffa Miskell have assessed the ecological effects of the proposed realignment of designation 8517.

Between Te Puke O Tara Sports Park and Te Irirangi Drive, the existing designation overlies approximately 1.4ha of revegetated kanuka and riparian wetland vegetation in the vicinity of a tributary of Ōtara Creek. The designation crosses the tributary in three places encompassing approximately 275m of watercourse. Construction of a cable trench along this alignment would require extensive clearance and disturbance of the revegetated kanuka scrub, riparian wetlands and stream bed.

Within the Sancta Maria stormwater reserve the existing designation overlies approximately 0.3 ha of riparian vegetation and induced wetland and approximately 58 metres of the Ōtara Creek tributary together with approximately 0.2ha of mature forest plantings.

Boffa Miskell concludes that the alteration to designation 8517 involves no more than a minor change to the effects on the environment associated with the use of any land or water concerned, except insofar that the realignment will result in improved ecological outcomes.

5.4. Archaeological Effects

Except as discussed below in relation to the East Tāmaki Road section of the proposed alteration to designation 8517 CFG Heritage have concluded that the change in effects of the alteration will be no more than minor. In Stancombe Road there are archaeological sites in close proximity to the designation but these have been destroyed by previous works.

East Tāmaki Road runs through the historic Smales Farm (Hampton Park). There are a number of archaeological sites within Hampton Park. While these sites will not be impacted by the alteration to the designation, their presence indicates that there may be other unrecorded archaeological sites in the vicinity that could be affected by works in the designation.

CFG Heritage recommend changing condition 9 of the designation as follows:

~~Before any construction works are carried out associated with the Upper North Island Upgrade Project, Transpower shall make any minor adjustments to the location of the cable trench within the corridor to ensure that the sites R11/2333 and R11/2384 are not damaged by construction of the cable trench. Advice note: This condition is subject to any conditions of any archaeological authority granted under the Historic Places Act 1993.~~

Prior to construction works commencing, an HNZPT archaeological authority should be applied for to undertake works on East Tāmaki Road. The remainder of the works should take place under Transpower's accidental discovery protocol.

5.5. Other Effects

Other effects of construction, operation and maintenance of the cable within the altered designation include noise, landscape and visual effects and effects from lighting and glare during any night-time works.

Since the designation was confirmed, Transpower has identified a compliance issue with Conditions 14 of Designation 8517. Condition 14 requires Transpower to ensure construction noise does not exceed the limits in NZS6803: 1999 Acoustics-Construction Noise. However, this is not the intent of that standard and Transpower is proposing changes to Conditions 14 and 15 to align them with the requirements of the construction noise standard. WSP have assessed the acoustic effects of these changes (see Appendix 7) and concluded that they will be low.

In our opinion, all other effects are unlikely to be different from those that were assessed at the time the designation was considered and confirmed in 2009 and the designation conditions imposed at that time address these effects where necessary.

5.6. Summary of Environmental Effects

Tonkin & Taylor, Boffa Miskell, CFG Heritage, WSP and Dines Consulting have concluded that the proposed alteration to the designation will involve no more than minor changes to the effects anticipated by the original NoR for designation 8517. In addition, the proposed designation removal will avoid adverse ecological effects on a revegetated section of a tributary to the Ōtara Stream and the Sancta Maria stormwater pond. CFG Heritage have proposed an amendment to condition 9 of the designation to ensure that effects on any archaeological sites are managed appropriately.

6. Statutory Assessment

Section 181(3) of the RMA states:

A territorial authority may at any time alter a designation in its district plan or a requirement in its proposed district plan if—

- (a) the alteration—*
 - (i) involves no more than a minor change to the effects on the environment associated with the use or proposed use of land or any water concerned; or*
 - (ii) involves only minor changes or adjustments to the boundaries of the designation or requirement; and*
- (b) written notice of the proposed alteration has been given to every owner or occupier of the land directly affected and those owners or occupiers agree with the alteration; and*
- (c) both the territorial authority and the requiring authority agree with the alteration—*

and sections 168 to 179 and 198AA to 198AD shall not apply to any such alteration.

Section 5 of this report concludes that the proposed alteration to the designation will involve no more than minor changes to the effects on the environment of the proposed use of the land.

As discussed further in section 7 below, written notice of the proposed alteration has been given to the owners and occupiers of directly affected land and these parties agree with the alteration. These parties are:

- Auckland Transport;
- The property owner at 2 Harekeke Terrace, 4 Springhill Road, and 227 Brownhill Road, together with the property owner at 542 Ormiston Road.

Finally, it is understood that Auckland Council is comfortable with the proposed alteration.

7. Consultation

Transpower has consulted with Vector Limited, Watercare, Auckland Transport, Spark Limited, Chorus Limited, WEL Networks, Forty South, Connexa, Ministry of Education, Sancta Maria School, Mission Heights Primary School, Mission Heights College, Sir Edmund Hillary Collegiate, Fire & Emergency New Zealand (FENZ) and Kāinga Ora.

Each party was contacted by letter (see examples in Appendix 8), provided with plans of the proposed alteration to the designation and given the opportunity to meet with and/or ask questions of members of the Transpower project team.

Transpower has also advised the following tangata whenua groups of the proposal and provided them with a copy of the archaeological assessment:

- Ngāi Tai ki Tāmaki
- Ngāti Maru
- Ngāti Pāoa Iwi Trust
- Ngāti Paoa Trust Board
- Ngāti Tamaoho
- Ngāti Tamaterā
- Ngāti Te Ata
- Ngāti Whanaunga
- Te Ahiwaru – Waiohū
- Te Ākitai Waiohū
- Te Patukirikiri
- Waikato – Tainui

Ngāti Tamaoho are the only party that responded. They have prepared a Cultural Values Assessment (CVA) and made it available to Transpower.

The results of the consultation undertaken to date are tabulated in Appendix 8. In summary:

- Watercare, WEL Networks, Fortysouth, Connexa, Kāinga Ora, Spark and FENZ have confirmed that they have no concerns at the present time.
- Fortysouth sought to ensure that condition 7 remained as it protected their existing assets. Transpower do not propose any material changes to condition 7.
- FENZ supported the retention of condition 24 which requires consultation with FENZ regarding emergency access to properties. Transpower do not propose any material changes to condition 24.
- Vector Limited requested a condition that required Transpower to review the extent of the designation following completion of construction and remove any areas of land that are no longer necessary. This has been agreed by Transpower. Once agreed, Vector then confirmed it has no further concerns.

- Ministry of Education requested additional sub-clauses in condition 22 (outlining the details to be included in the Traffic Management Plan) to:
 - confirm that road closures, lane closures or diversions outside the schools be undertaken outside school hours or during school holidays to the extent practicable;
 - confirm heavy vehicles would not be travelling past schools during peak before and after school travel times; and
 - require Transpower to provide details of how truck drivers will be briefed on the travel around schools,

Transpower has agreed to these additional sub-clauses.

- Chorus and the schools have not yet responded. Details of any discussions with these parties will be provided when the parties respond.
- Discussions with Auckland Transport have resulted in amendments to designation conditions to address the organisation's concerns. Auckland Transport provided its approval to the alteration to the designation in a letter dated 30 August 2023 (see Appendix 8).
- Representatives for the property owner at 2 Harekeke Terrace, 4 Springhill Road and 227 Brownhill Road, and the property owner at 542 Ormiston Road were sent notice of the proposed alteration and have advised that the landowner agrees to the alteration to the designation (see Appendix 8). In addition, Transpower holds easements over these properties.
- Transpower is continuing to engage with mana whenua and intends to work with Ngati Tamaoho to implement the recommendations made in the CVA.

8. Designation Conditions

Tonkin & Taylor, WSP, Boffa Miskell, CFG Heritage, Dines Consulting and Transpower have reviewed the conditions of designation 8517 and consider that they continue to be suitable to manage the effects of the installation, operation and maintenance of the proposed underground cable between the Ōtāhuhu and Brownhill Road substations. Some changes to conditions and new conditions have been proposed.

Amendments to Conditions 14 and 15 are proposed to address a compliance issue that has been identified with NZS6803: 1999 wherein it is not practicable to “ensure that construction and maintenance noise does not exceed limits”. The reasons for the proposed change are set out in the memorandum contained in Appendix 7 prepared by WSP.

A new condition (condition 31) has been included in response to consultation with Vector and additional sub-clauses have been added to condition 22 which sets out the contents of the Traffic Management Plan.

Condition 29 has been amended, a new condition 33 and a new Advice Note 2 has been added in response to concerns raised by Auckland Transport.

The remaining changes to conditions are to correct some minor errors, align the designation with the most up-to-date versions of documents incorporated by reference, amend road names where necessary, implement the recommendations of CFG Heritage and change organisations’ names where name changes have occurred (e.g. Heritage New Zealand and Kāinga Ora) since the designation was confirmed in 2009.

Proposed amendments to the conditions are shown in Appendix 9.

9. Conclusion

Transpower NZ Limited (Transpower) is serving an NoR to alter Designation 8517 in the AUP for the BHL-OTA Designation. The cables have not yet been installed but Transpower holds easements, in perpetuity, over all privately-owned land along the designated route.

As development in the area around the designation route has occurred since the designation was confirmed, some minor changes to the designation route would be advantageous to better align the designation with the development pattern in the area.

The effects of the proposed alteration to the designation on traffic and transport, three waters infrastructure, archaeology and ecology have been assessed and the assessments have concluded that:

- the proposed alteration to the designation will involve similar effects on traffic, transport and three waters infrastructure to those anticipated by the original NoR for designation 8517;
- the proposed designation alteration will result in no more than minor changes to the ecological effects of the original designation in the area; and
- an amendment to condition 9 of the designation is necessary to ensure that effects on any archaeological sites are managed appropriately.

Consultation undertaken to date has resulted in some minor changes to designation conditions to address the concerns of potentially affected parties.

Transpower is continuing to engage with mana whenua and intends to work with Ngati Tamaoho to implement the recommendations made in the CVA.

In addition to the changes to the designation route, Transpower also proposes some minor changes to the designation conditions to take account of updates to documents incorporated by reference and changes to the names of organisations and roads referred to.

Overall, the notice of requirement to make a minor alteration to designation 8517 will have no more than minor changes to the effects of the designation on the environment and on potentially affected parties and landowners. Written notice of the proposed alteration has been given to the owners and occupiers of directly affected land and these parties agree with the alteration.



Appendix 1

Notice of Requirement