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

**Date:** Monday 21 to Thursday 24 August 2023  
Monday 28 to Thursday, 31 August 2023  
Monday 4 to Thursday, 7 September 2023  
Monday 11 to Thursday, 14 September 2023

**Time:** 9.30am

**Venue:** TBC

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**HEARING REPORT – VOLUME FIVE**

**FIVE NOTICES OF REQUIREMENT**

**AIRPORT TO BOTANY BUS RAPID TRANSIT CORRIDOR**

**THE SUPPORTING GROWTH ALLIANCE  
(AUCKLAND TRANSPORT AND WAKA KOTAHI  
NZ TRANSPORT AGENCY)**

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**COMMISSIONERS**

**Chairperson** David Wren  
**Commissioners** Alan Pattle  
Basil Morrison

Bevan Donovan  
KAITOHUTOHU WHAKAWĀTANGA  
HEARINGS ADVISOR

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

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

## **WHAT HAPPENS AT A HEARING**

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

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

### **Hearing Schedule**

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

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

### **Cross Examination**

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

### **The Hearing Procedure**

The usual procedure for a hearing is:

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

**FIVE NOTIFIED NOTICES OF REQUIREMENT TO THE AUCKLAND COUNCIL UNITARY PLAN BY THE SUPPORTING GROWTH ALLIANCE (AUCKLAND TRANSPORT AND WAKA KOTAHI NZ TRANSPORT AGENCY)**

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Trevor Mackie, Planner (consultant)

Reporting on proposed Notice of Requirements – see page 10 for full details.

**REQUIRING AUTHORITY:** THE SUPPORTING GROWTH ALLIANCE (AUCKLAND TRANSPORT AND WAKA KOTAHI NZ TRANSPORT AGENCY)

**VOLUME THREE** **1135 - 1146**

<b>SUBMITTERS - NOR 1 - BUS RAPID TRANSIT - BOTANY TO RONGOMAI PARK (AUCKLAND TRANSPORT):</b>	
Page 1147	Xu Yajun
Page 1149	Kawaljeet Singh
Page 1151	Litao Chen
Page 1153	Eddie Cheok
Page 1155	Balwinder Singh
Page 1156	Ugan Naidoo
Page 1157	Roger Dundang
Page 1158	P Thambirajah & T Paskaranandavadivel
Page 1160	Kamlesh Rana & 33 Signatories

Page 1199	BPG Developments Limited
Page 1205	Mr Aisea Sasalu
Page 1207	Theresa Tusa
Page 1209	Vanessa Phillips
Page 1263	Huaxiu Wang
Page 1265	Tanaz and Rustom Turel
Page 1270	Kathleen Waller
Page 1272	Danny Charanjit Singh
Page 1276	Rajnish Kalsi
Page 1278	Kindercare Learning Centres Limited
Page 1311	Mr Modher Adnan Abdulrazak Barakat and Mrs Yessar Ahmed Ali Barakat
Page 1319	National Mini Storage Limited
Page 1324	Anil Rodrigues
Page 1326	Business East Tamaki
Page 1330	Samir Chalabi
Page 1333	Taruna and Saurabh Tiwary
Page 1335	Heather Haylock
Page 1385	TIM Nominees Limited and The Saint Johns College Trust Board
Page 1409	Phisan Charoenmongkhonwilai
Page 1411	Samantha Searle
Page 1413	Paul Reyneke
Page 1467	Matthew Cheeseman
Page 1521	Maureen Irwin
Page 1575	Laura Unasa
Page 1629	Emerson Cheeseman
Page 1683	Tasman Accounting trustee Ltd
Page 1687	Jamie Khang Nguyen
Page 1691	Heritage New Zealand Pouhere Taonga
Page 1694	Mohammad Meraj
Page 1696	Kim Bloom
Page 1698	Telecommunications Submitters
Page 1705	Kāinga Ora Homes And Communities
Page 1730	Watercare Services Limited
Page 1734	Ministry of Education - Te Tāhuhu o te Mātauranga
Page 1738	Selemena Afamasaga
Page 1739	Paul Street, on behalf of Street Properties Limited.
Page 1741	Te Akitai Waiohua Waka Taua Trust

**LATE SUBMITTERS NOR 1 - BUS RAPID TRANSIT - BOTANY TO RONGOMAI PARK (AUCKLAND TRANSPORT):**

Page 1743	East Tamaki Investments Limited
Page 1752	Beale Partnership
Page 1759	Howard Property Limited
Page 1768	Ormiston Centre Ltd

**VOLUME FOUR**

**1773 - 1784**

**SUBMITTERS - NOR 2 - NOTICE OF REQUIREMENT: RONGOMAI PARK TO PUHINUI STATION (IN THE VICINITY OF PLUNKET AVENUE) (AUCKLAND TRANSPORT):**

Page 1785	Josh Tiro
Page 1787	Pengxiang Huang
Page 1789	Neha Singh
Page 1791	Ram Chandar
Page 1792	Manjinder Singh Birk
Page 1793	Rawandeep Kaur
Page 1794	Lokesh Gera
Page 1795	Monish Anish Prasad
Page 1797	SPG Manukau Limited
Page 1825	Jude Manoharan
Page 1827	Maki Joseph-Tereroa and Makea-Rupe Tereroa
Page 1829	Lynette Henderson
Page 1831	Duncan and Sandra Loudon
Page 1837	Simran Krishna
Page 1839	Aneeta Krishna
Page 1841	Ashok Krishna
Page 1843	Murdoch Newell Management Limited
Page 1854	The Legends Property Limited
Page 1859	Kamlesh Rana & 33 Signatories
Page 1898	Ormiston Centre Ltd
Page 1901	Renaissance Apartments Body Corporate 316863
Page 1906	Auckland University of Technology
Page 1914	Minister of Education
Page 1921	BPG Developments Limited
Page 1926	Ben Schollitt
Page 1928	Savitri Devendra
Page 1930	Aaron Chand

Page 1932	Dannie Ha
Page 1934	Australasia Branch Office of Jehovah's Witnesses
Page 1935	Reena Rani
Page 1937	Risha Kumar
Page 1939	Ramon Lopez
Page 1940	Alice Anne Lopez
Page 1941	John Isaac Subhashni Devi Sadd
Page 1942	Simran Krishna
Page 1944	Minakshi Mohanlal
Page 1946	Avisha Mohanlal
Page 1948	Business Manukau
Page 1959	Kmart NZ Holdings Limited
Page 1962	Van Den Brink 652 Limited
Page 1968	A.M. Self Limited
Page 1974	Sandeep Kumar
Page 1976	McAlvin Sembrano
Page 1978	Scentre (New Zealand) Limited
Page 1980	Z Energy Limited
Page 1987	Bunnings Limited
Page 1990	Chalmers Properties Ltd
Page 1993	Fa'ana Campbell
Page 1998	PSPIB/CPPIB Waiheke Inc
Page 2001	Auckland Body Corporate Limited
Page 2005	General Distributors Limited
Page 2008	JOLT Charge (New Zealand) Limited
Page 2011	Heather Haylock
Page 2061	Harvey Norman Properties NZ Ltd and Harvey Norman Stores Pty NZ Ltd
Page 2073	Kotare Trust
Page 2074	Mitre 10 Holdings Limited
Page 2080	Phisan Charoenmongkhonwilai
Page 2081	Mr Martyn Chalmers and Mrs Nurhayati Chalmers
Page 2090	Centuria Capital (NZ) Limited
Page 2097	Joo Han Song
Page 2099	Su Me Lee
Page 2101	Vaine Tutai Richard
Page 2103	Christian Lewis Sims
Page 2105	Danny Charanjit Singh
Page 2114	Mr Shane Robert Haylock

Page 2119	Heritage New Zealand Pouhere Taonga
Page 2122	Puhinui School
Page 2125	Abhisekh Mohanlal
Page 2127	Avisha Mohanlal
Page 2131	Roy Sembrano
Page 2137	Andrea Mead & Dr Stephanie Mead
Page 2142	Eke Panuku Development Auckland
Page 2153	Quadrant Properties Ltd
Page 2156	Arena Williams MP
Page 2171	Telecommunications Submitters - Chris Horne
Page 2178	Kāinga Ora Homes And Communities
Page 2203	Watercare Services Limited
Page 2207	Ministry of Education - Te Tāhuhu o te Mātauranga
Page 2211	Firdosh and Kashmira Siganporia
Page 2212	Selemena Afamasaga
Page 2213	Gordon Barthow
Page 2214	Te Akitai Waiohua Waka Taua Trust

**VOLUME FIVE**

**2218 - 2229**

<b>SUBMITTERS - NOR 3 - NOTICE OF REQUIREMENT: BUS RAPID TRANSIT – PUHINUI STATION (IN THE VICINITY OF PLUNKET AVENUE) TO SH20/20B INTERCHANGE (AUCKLAND TRANSPORT):</b>	
Page 2230	Varinder
Page 2231	Karishma Pinter
Page 2233	Colin Brent Robinson
Page 2235	Parvinder singh
Page 2237	Ronil Prasad
Page 2239	Ganpat Patel
Page 2241	Bhaveshbhai Ramanbhai Patel
Page 2243	Hsin Mila Cheung Tsai
Page 2251	Adelante Holdings
Page 2252	John Hansford
Page 2257	Kamlesh Rana & 33 Signatories
Page 2296	Birgitta Sherley Prom
Page 2298	Wiri Business Association Inc
Page 2308	Manukau Auto & Tyre Centre
Page 2309	Jasvinder Singh and Harmeet Kaur Sokhi

Page 2311	Lee mee THEN
Page 2312	Jehovah's Witnesses – Manukau Kingdom Hall Trust
Page 2313	Reena Rani
Page 2315	Michelle Joy Te Hira
Page 2320	KiwiRail Holdings Limited
Page 2322	Avisha Mohanlal
Page 2324	Minakshi Mohanlal
Page 2326	Anwar Ali Family Trust
Page 2329	Alex Herkes
Page 2330	Anahera Edmonds
Page 2333	Heather Haylock
Page 2389	Shane Robert Haylock
Page 2394	Puhinui School
Page 2397	Mr Rajesh Kumar Sachdeva & Sunita Sachdeva & Ripul Sachdeva
Page 2405	Abhisekh Mohanlal
Page 2407	Heritage New Zealand Pouhere Taonga
Page 2414	Quadrant Properties Ltd
Page 2417	Arena Williams MP
Page 2425	Telecommunications Submitters - Chris Horne
Page 2432	Kāinga Ora Homes And Communities
Page 2457	Watercare Services Limited
Page 2461	Ministry of Education - Te Tāhuhu o te Mātauranga
Page 2465	Te Akitai Waiohua Waka Taua Trust
Page 2466	Satnam Bhatt

**LATE SUBMITTERS NOR 3 - NOTICE OF REQUIREMENT: BUS RAPID TRANSIT – PUHINUI STATION (IN THE VICINITY OF PLUNKET AVENUE) TO SH20/20B INTERCHANGE (AUCKLAND TRANSPORT):**

Page 2470	Anita Singh & Ramandeep Singh
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**SUBMITTERS - NOR 4A - NOTICE OF REQUIREMENT: BUS RAPID TRANSIT - SH20/20B INTERCHANGE TO ORRS ROAD (AUCKLAND TRANSPORT):**

Page 2472	Tunicin Investments Limited and Airface Limited
Page 2478	Kamlesh Rana & 33 Signatories
Page 2517	Alan James Steele
Page 2520	Altrend Properties Limited
Page 2525	Avisha Mohanlal



Page 2531	Minakshi Mohanlal
Page 2533	New Zealand Storage Holdings Limited
Page 2539	Wiri Oil Services Limited (WOSL)
Page 2545	Heather Haylock
Page 2586	Phisan Charoenmongkhonwilai
Page 2587	Heritage New Zealand Pouhere Taonga
Page 2590	Abhisekh Mohanlal
Page 2592	Telecommunications Submitters - Chris Horne
Page 2599	Fernbrook Property Ltd
Page 2602	Kāinga Ora Homes And Communities
Page 2627	Watercare Services Limited
Page 2631	Ministry of Education - Te Tāhuhu o te Mātauranga
Page 2635	Auckland International Airport Limited
Page 2639	Te Akitai Waiohua Waka Taua Trust

**SUBMITTERS - NOR 4B - NOTICE OF REQUIREMENT: ALTERATION TO DESIGNATION 6717 STATE HIGHWAY 20B – STATE HIGHWAY 20 TO AUCKLAND INTERNATIONAL AIRPORT (WAKA KOTAHI NZ TRANSPORT AGENCY):**

Page 2642	Wendy Jane Rodger
Page 2644	Kamlesh Rana & 33 Signatories
Page 2683	Maya Krishna Goundar
Page 2684	Heather Haylock
Page 2725	Heritage New Zealand Pouhere Taonga
Page 2728	Telecommunications Submitters - Chris Horne
Page 2735	Fernbrook Property Ltd
Page 2738	Watercare Services Limited
Page 2742	Ministry of Education - Te Tāhuhu o te Mātauranga
Page 2746	Auckland International Airport Limited
Page 2750	Te Akitai Waiohua Waka Taua Trust

**LATE SUBMITTERS NOR 4B - NOTICE OF REQUIREMENT: ALTERATION TO DESIGNATION 6717 STATE HIGHWAY 20B – STATE HIGHWAY 20 TO AUCKLAND INTERNATIONAL AIRPORT (WAKA KOTAHI NZ TRANSPORT AGENCY):**

Page 2752	Altrend Properties Limited
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<b>LOCAL BOARD COMMENTS ON ALL NOR'S</b>	
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Page 2758	Howick Local Board
Page 2760	Otara Papatoetoe Local Board
Page 2766	Māngere-Ōtāhuhu Local Board

### **NoR 1 - Bus Rapid Transit - Botany to Rongomai Park (Auckland Transport)**

NoR lodged by Auckland Transport for a new designation to widen Te Irirangi Drive between Botany and Rongomai Park to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

Key features of the proposal include:

- a dedicated Bus Rapid Transit corridor, centre-running along Te Irirangi Drive
- Bus Rapid Transit stations at Smales Road, Accent Drive, and Ormiston Road – Botany Junction Shopping Centre
- walking and cycling facilities on both sides of the corridor
- swales and wetlands
- areas for construction related activities including yards, site compounds, and bridge and structure works.

### **NoR 2 - Notice of Requirement: Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue) (Auckland Transport)**

NoR lodged by Auckland Transport for a new designation to widen a number of existing roads to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

Key features of the proposal include:

- a dedicated Bus Rapid Transit corridor, centre-running for the majority of the corridor along Te Irirangi Drive, Great South Road, Ronwood Avenue, Manukau Station Road, Lambie Drive, and Puhinui Road. West-running on Davies Avenue along the edge of Hayman Park
- Bus Rapid Transit stations at Dawson Road, Diorella Drive, Ronwood Avenue, Manukau Station, and the corner of Lambie Drive and Puhinui Road Station.
- walking and cycling facilities on both sides of the corridor
- priority access for fire engine movements across the Bus Rapid Transit corridor at Papatoetoe Fire Station
- new signalised intersections at Mitre 10 and Bunnings Warehouse, Lambie Drive and Ronwood Avenue, and Puhinui Road and Plunket Avenue
- swales and wetlands
- areas for construction related activities including yards, site compounds, and bridge and structure works.

### **NoR 3 - Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)**

NoR lodged by Auckland Transport for a new designation to widen the existing Puhinui Road between Plunket Avenue and east of the SH20/SH20B Interchange to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

Key features of the proposal include:

- a dedicated Bus Rapid Transit corridor, centre-running along Puhinui Road connecting to the Puhinui Station concourse via a new Bus Rapid Transit bridge structure
- a Bus Rapid Transit station at Puhinui Station
- walking and cycling facilities on both sides of the corridor
- walking and cycling facilities will be provided along Cambridge Terrace, Bridge Street and Kenderdine Road
- wetland

- areas for construction related activities including yards, site compounds, and bridge and structure works.

**NoR 4a - Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)**

NoR lodged by Auckland Transport for a new designation to widen Puhinui Road between the SH20/SH20B Interchange and Orrs Road to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

Key features of the proposal include:

- a dedicated Bus Rapid Transit corridor, centre-running on Puhinui Road through to the Manukau Memorial Gardens intersection (approximately 600m west of SH20/SH20B Interchange); and south running to Orrs Road
- walking and cycling facilities on southern side of the corridor
- swales
- area for construction related activities including yards, site compounds, and bridge and structure works.

**NoR 4b - Notice of Requirement: Alteration to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport (Waka Kotahi NZ Transport Agency)**

NoR lodged by Waka Kotahi NZ Transport Agency to alter Designation 6717 State Highway 20B - State Highway 20 to Auckland International Airport. The alteration is from the SH20/SH20B Interchange to Manukau Memorial Gardens.

Key features of the proposal include:

- to provide westbound lanes to Auckland Airport
- walking and cycling facilities
- a ramp from SH20B onto SH20 for southbound traffic while enabling a Bus Rapid Transit corridor.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:327] Notice of Requirement online submission - Varinder  
**Date:** Monday, 13 March 2023 8:00:21 pm

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The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Varinder

Organisation name:

Full name of your agent: Varinder

Email address: varindercr7@gmail.com

Contact phone number: 0212060424

Postal address:

Papatoetoe  
Papatoetoe 2025

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

I worked on my property and worked 3 jobs to own it.

I or we seek the following recommendation or decision from Auckland Council:

Is my property affected by it Address is 1/66A Puhinui Road

Submission date: 13 March 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:326] Notice of Requirement online submission - Karishma Pinter  
**Date:** Monday, 13 March 2023 7:00:20 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Karishma Pinter

Organisation name:

Full name of your agent:

Email address: Karishmapinter@yahoo.co.nz

Contact phone number: 02102916986

Postal address:

14/83 puhinui rd Papatoetoe

Papatoetoe

Papatoetoe 2104

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

14/83 puhinui rd Papatoetoe Auckland. I want to know what is going on I need clear answers .

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

I am sick and tired of Auckland Council decisions .it's a shame we as citizens we have to go through this . Where is government getting money from ? Everything so expensive it's so hard to buy or afford houses .. If we happen to vacate from here is government paying me 850k ? I would take more money to move from here simple .. This is such a nuisance to be honest wasting everyone's time .

I or we seek the following recommendation or decision from Auckland Council:

I just don't want to move from my property..or I have said above what happens .. And I don't have any supporting docs

Submission date: 13 March 2023

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

#### Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,

- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:334] Notice of Requirement online submission - Colin Brent Robinson  
**Date:** Saturday, 18 March 2023 11:45:16 am

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The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Colin Brent Robinson

Organisation name:

Full name of your agent:

Email address:

Contact phone number: 09 2777826

Postal address:

207 Puhinui Rd

Papatoetoe

Auckland 2025

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

1) I have retired recently and have no sources of income other than the small government pension for people over 65. I am planning to subdivide my section to build a rental property. Hence, I am unsure regarding the negative impact of this notice and the associated work on my future plans. 2) I have health issues and hence am very concerned regarding the disruption, noise and dust issues and their impact on my health and wellbeing. 3) The notice dated 10 March received by me is generic and does not specify the exact nature of the impact on my property on 207 Puhinui Rd. I called the council on 17 March and spoke to Trevor Macky. He advised that there will not be any direct loss of land for my property. I would like this to be confirmed in writing. 4) For such a project which has significant bearing on people like me and the community, I would expect that the government would consult us prior to sending such a notice, which is extremely worrying and has caused immense anxiety.

I or we seek the following recommendation or decision from Auckland Council:

1) Written statement regarding the exact impact of this work on my property and a guarantee that my land will not be impacted. 2) Relocation to a suitable accommodation during the construction phase, to mitigate any adverse impact on my health.

Submission date: 18 March 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes



## Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:338] Notice of Requirement online submission - Parvinder singh  
**Date:** Sunday, 19 March 2023 7:45:29 pm

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The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Parvinder singh

Organisation name:

Full name of your agent:

Email address: singhparvinder418@gmail.com

Contact phone number: 02102916986

Postal address:  
 14/83 puhinui road  
 Papatoetoe  
 Auckland 2104

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

My house .I work so hard for my house which you guys want to grab it from us which yous don't have any rights ..doesn't government and council has better to do ?,,instead of helping the citizens of new Zealand you guys are making our life a hell.if you guys want my property give me 800k then I will let council touch my property.or else no way ..do better things already there's inflation it's hard for us to survive and here you guys coming up with the stupid move .. I am going oppose this plan and notice .... Show some humanity and respect towards us kiwis .

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

That iam going oppose this notice or plan .I don't agree at all.i work so hard for my house my place .I got a reputation as a kiwi you know . Dont you guys as Auckland council have better things to do? Already everything is so expensive petrol food house rent mortgage and now this ..go demolish else where ..please don't make our life hard .all yous do is make life hard on the road cones everywhere traffic jam.grow up NZ government and Auckland council instead of wasting money go help out ppl who lost there house in cyclone go fix the road .where it gets flooded. I don't agree with this plan .

I or we seek the following recommendation or decision from Auckland Council:

All we have to say is iam going against this notice this unitary track . Nothing else to say Council pay me 800k then I can move or else forget Abt it .... We work hard we pay too much tax and is this the way yous treat the citizens of new Zealand.

Submission date: 19 March 2023

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:339] Notice of Requirement online submission - Ronil Prasad  
**Date:** Sunday, 19 March 2023 8:00:30 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Ronil Prasad

Organisation name:

Full name of your agent:

Email address: Ronilprasad86@gmail.com

Contact phone number: 02102244219

Postal address:

14/83 puhinui road  
Papatoetoe 2104

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

I am going oppose this notice of unitary track on puhinui Rd. Give me 800k then I can make up my mind . I work hard for my house living family .pay too much tax . Please do some productive Auckland council and NZ government instead of making our life hard .not worth it. I reiterate this again iam going oppose this notice.simple as that .

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Not agreeing on this plan .iam against this .or give me my money 800k then I can come up with the plan .or nope not interested.

I or we seek the following recommendation or decision from Auckland Council:

I am going oppose this plan .that's final . Give me my money that I spent . Please don't my our life so hard .

Submission date: 19 March 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal

- details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:395] Notice of Requirement online submission - Ganpat Patel  
**Date:** Monday, 3 April 2023 1:15:12 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Ganpat Patel

Organisation name:

Full name of your agent: Ketan Patel

Email address: [ketan.p@outlook.com](mailto:ketan.p@outlook.com)

Contact phone number: 0220751992

Postal address:  
165 Puhinui Road  
Takanini  
Papatoetoe 2104

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

EXISTING PARKING IS SHOWN TO BE REMOVED OUTSIDE OF THE BLOCK OF SHOPS BETWEEN 159 - 169 PUHINUI ROAD.

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

AS OWNERS OF THE BLOCK OF SHOPS BETWEEN 159 – 165 PUHINUI ROAD, PAPATOETOE, WE WOULD LIKE TO BRING TO YOUR ATTENTION THAT THE PROPOSED AIRPORT TO BOTANY PROJECT IS CURRENTLY LOOKING TO REMOVE THE PARKING OUTSIDE OUR SHOPS AS PART OF THEIR WORKS. AS YOU WOULD IMAGINE THIS WILL HAVE A MAJOR IMPACT ON THE LIVELIHOOD OF THE 8 BUSINESS IN THIS LOCATION AND THEIR FAMILIES. WE HAVE BEEN THROUGH SO MUCH IN THE PAST 2 YEARS WITH COVID AND DAMAGE FROM THE RECENT TORNADO AND TO HAVE THIS ALSO NOW IMPACT OUR BUSINESSES IS CAUSING A LOT OF STRESS TO ALL BUSINESS OWNERS. FURTHERMORE, OVER THE PAST 25 YEARS OF OWNING THE SHOPS WE HAVE HAD OUR PARKING RETAINED OVER THE MANY CHANGES THE ROAD HAS UNDERGONE IN THIS TIME. THEREFORE, IT WOULD BE BENEFICIAL FOR ALL INVOLVED TO HAVE THIS STRATEGY MAINTAINED FOR THE UPCOMING PROJECT.

I or we seek the following recommendation or decision from Auckland Council:

I WOULD LIKE TO KNOW THE OUTCOME OF THE ABOVE MENTIONED PARKING SITUATION AT THE EARLIEST. IT WOULD BE IDEAL IF PARKING WILL BE RETAINED OUTSIDE THE SHOPS. HOWEVER IF IT IS ABSOLUTELY NECESSARY TO REMOVE THE PARKING THEN PLEASE ADVISE AS WE WOULD NEED TO SELL THE PROPERTY AS THEY WILL NO LONGER BE VIABLE IN FUTURE.

Submission date: 3 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

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**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:397] Notice of Requirement online submission - bhaveshbhai ramanbhai patel  
**Date:** Monday, 3 April 2023 6:30:10 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: bhaveshbhai ramanbhai patel

Organisation name:

Full name of your agent:

Email address: bhavesh71222@gmail.com

Contact phone number: 0211571719

Postal address:  
284 puhinui rd  
papatoetoe  
AUCKLAND 2025

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

i am a shop owner at 284 puhinui rd .papatoetoe , this will impact on my business i am not support this project

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

i am a shop owner at 284 puhinui rd .papatoetoe , this will impact on my business i am not support this project

I or we seek the following recommendation or decision from Auckland Council:

i am a shop owner at 284 puhinui rd .papatoetoe , this will impact on my business i am not support this project

Submission date: 3 April 2023

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of



requirement as soon as reasonably practicable after submitting to Auckland Council.

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## Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name)

Hsin Mila Cheung Tsai

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

35 Jillteresa Crescent, Half Moon Bay, Auckland

Telephone:

211225166

Fax/Email:

milacheung@gmail.com

Contact Person: (Name and designation if applicable)

**This is a submission on a notice of requirement:**

**By::** Name of Requiring Authority

Auckland Transport

**For:** A new designation or alteration to an existing designation

Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

**The specific parts of the above notice of requirement that my submission relates to are: (give details):**

Property ID 620464, 192 Puhinui Road, Papatoetoe, NA111B/228, Lot 39 DP 18037

**My submission is:**

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

**The reasons for my views are:**

Government shall only take the land actually required for the road construction and not take the whole piece of land. From the attached designation plan, the actual land required for the construction is only 1/3 to 1/2 of the land, but the whole piece of land was marked as "Land to be Designated".

(Here I would like to complain that the attached B to Form 18 - Schedule of directly affected properties is not "user friendly". It is not in order in either way, not by property ID, not by address, not by title no, legal description not even by sheet number. It jumps all over the place and hard to find.)

From the Designation Plan, you can see some properties were marked only partial area required and some marked the whole piece of land. If we draw a line "marked in Red" only one third to one half of the land will be required for property at 192 Puhinui Road "ID 620464". The property owner shall have the choice to keep part of the land so they can build or modify existing building to live. In this way, government can also save money by acquiring on the land that is "actually necessary" for the road construction and not wasting tax payer's money in acquiring the surplus land.

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

I seek the modification of Designation Plan of NoR3 Sheet 1 as attached to draw a line for the actual land required for the road construction and allow the properties owners to have the choice to depart the whole piece of land or depart only partial of the land that is actually required.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

03/04/2023

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

We would like Auckland Transport and Auckland council to acknowledge that there is a discrepancy between the acquisition of land for properties on Puhinui Road for the Airport to Botany Rapid Transit Upgrade.

For example

1. Property ID 620304, 160 Puhinui Road, land acquired is 356 m<sup>2</sup>. The piece of land is 16.8m wide, 54.4m long. So the required land is to the 21.19m from the Puhinui Road boundary.
2. Property ID 620446, 190 Puhinui Road, land required is 498 m<sup>2</sup>. The piece of land is 16.9m wide, 50.5m long. So the required land is to the 29.47m from the Puhinui Road boundary.
3. Property ID 620464, 192 Puhinui Road (adjoin land to 190 Puhinui Road above). The land required on the designation plan is 854m<sup>2</sup> (the whole piece of land). The piece of land is 16.9m wide, 50.5m long. If the whole piece of land is taken, the total 50.5m from the Puhinui Road boundary is taken and obviously, part of the whole piece of land is not actually required for the project. If we use the land distance required from Puhinui Road boundary as property ID 620304 21.19m to calculate, the land required for the project is only 358.11m<sup>2</sup>. If government take only the land required for the project, it can save more than half of the cost (tax payer's money) in acquisition the land and will not waste on the land which is not actually required for the project.

Based on the examples above, Auckland Transport and Auckland Council has to concede that they are attempting to acquire an excess of land, which is not necessary for the construction and expansion of Puhinui Road. We are opposed to the Notice of Requirement on the basis that Auckland council should only acquire land absolutely necessary for the road construction. It should aim for the most cost effective means of acquiring land - for the sake of the taxpayers. It should also aim to be fair to the existing home owners and aim not to unnecessarily displace the current residents of Puhinui Road.

Given fair treatment (based on 160 Puhinui Road, Property ID 620304) and acquiring a distance of 21.19m from the road for each of the home owners of Puhinui Road. There are multiple properties that will be able to save their homes, therefore not having to be displaced. We invite Auckland Transport and Auckland Council to consider fairly acquiring the necessary and vital amount of land needed for the project.

# Designation Plan

Land to be Designated  
Airport to Botany Rapid Transit Upgrade

## Legend

- Proposed Designation
- Parcel Boundary
- Property ID





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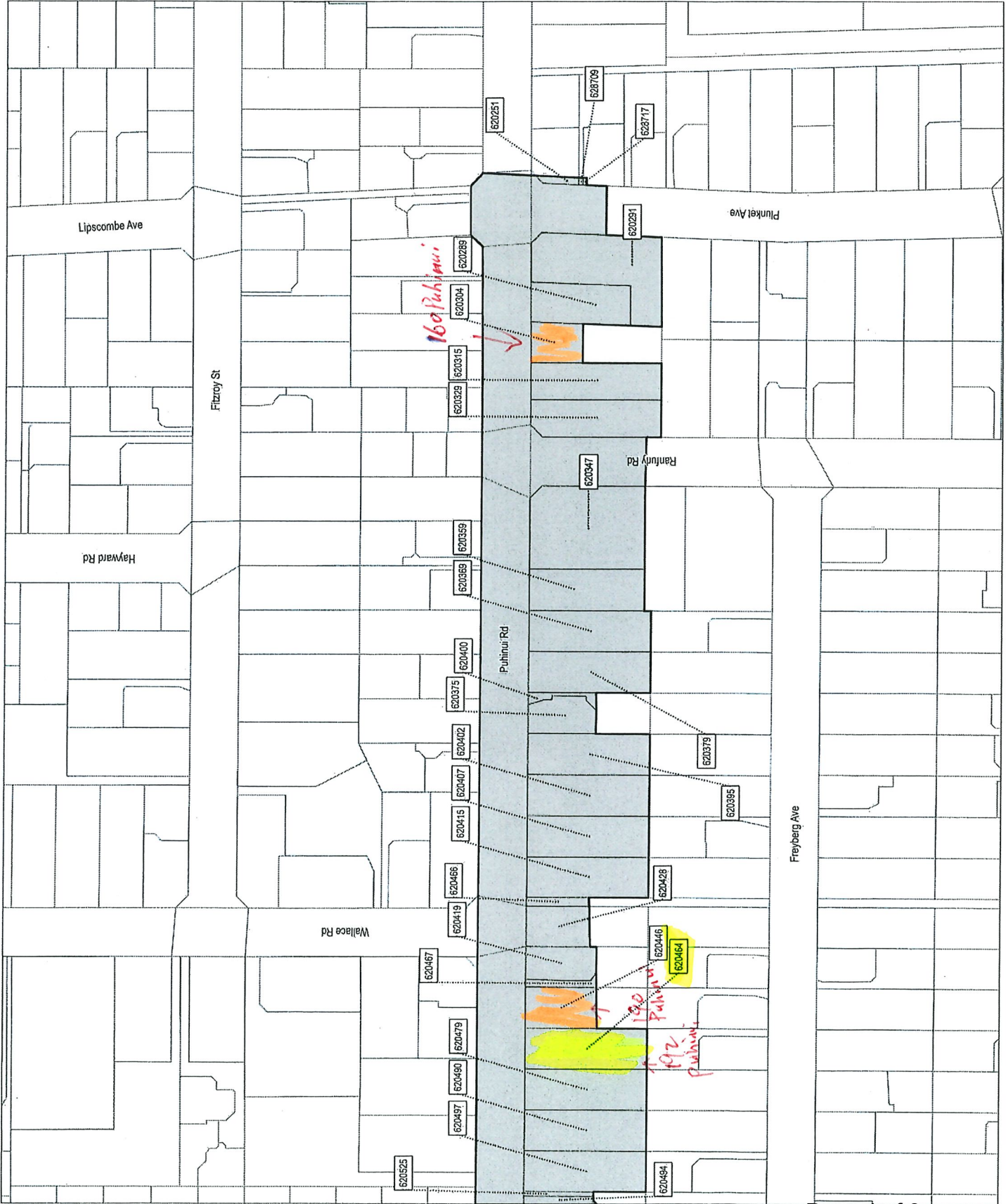
Map Scale @ A3: 1:1,500



Author	Checked	Approved	Date

Client: Auckland Transport / Waka Kotahi  
 Discipline: GIS  
 Project: Airport to Botany Rapid Transit Upgrade  
 Drawing No: SGA-PA-016  
 Sheet No: 1 of 4




**Designation Plan**  
Land to be Designated  
Airport to Botany Rapid Transit Upgrade

**Legend**

- Proposed Designation
- Panel Boundary
- Property ID


507729



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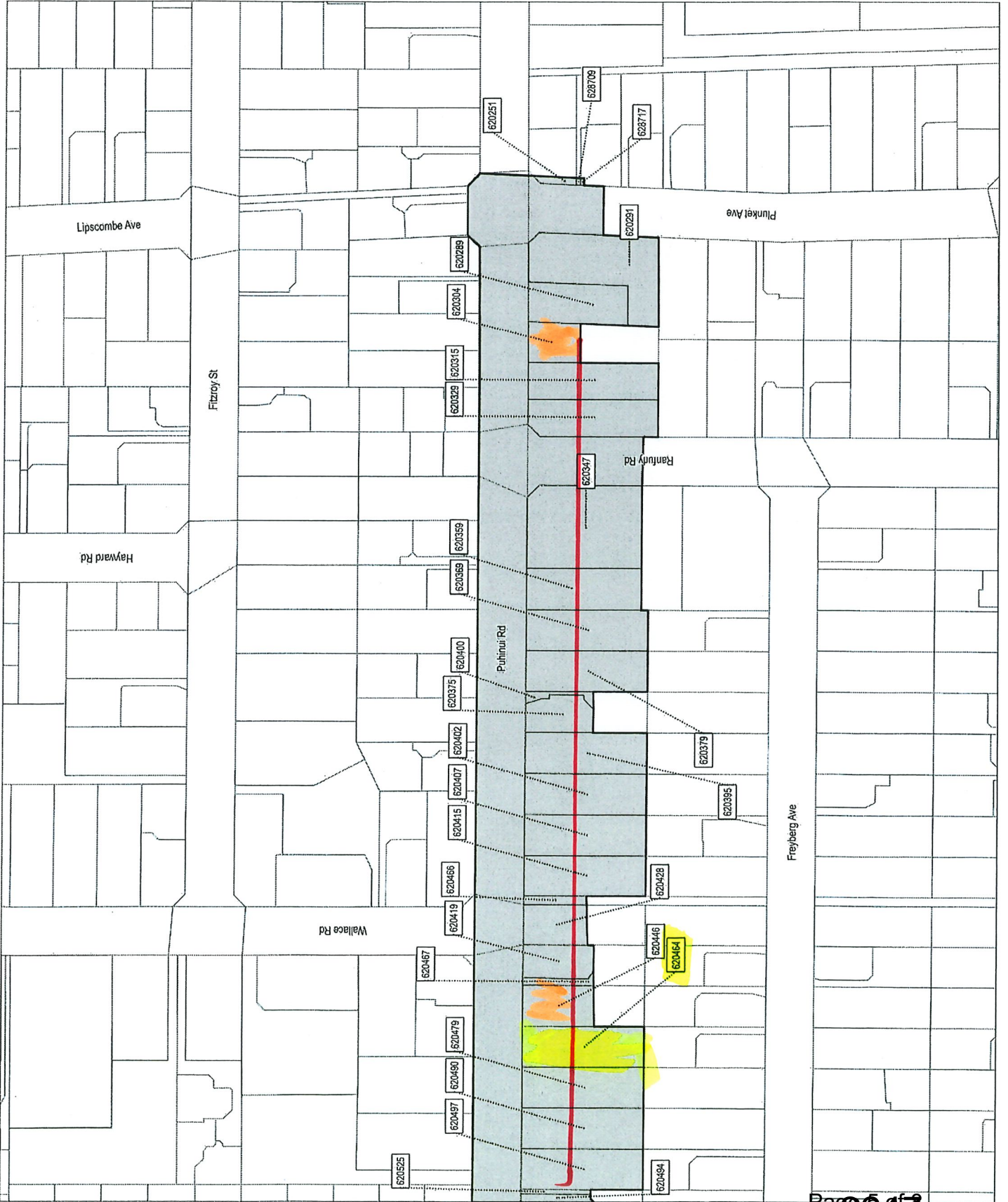
Map Scale @ A3: 1:1,500



Author	Checked	Approved	Date

Client: Auckland Transport / Waka Kotahi  
Discipline: GIS

Project: Airport to Botany Rapid Transit Upgrade  
Drawing No: SSA-PA-006  
Sheet No: 7 of 4

A

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64%

160 Puhinui Road

Get an appraisal

Track

View profile

Get an appraisal

### About the area



Schools



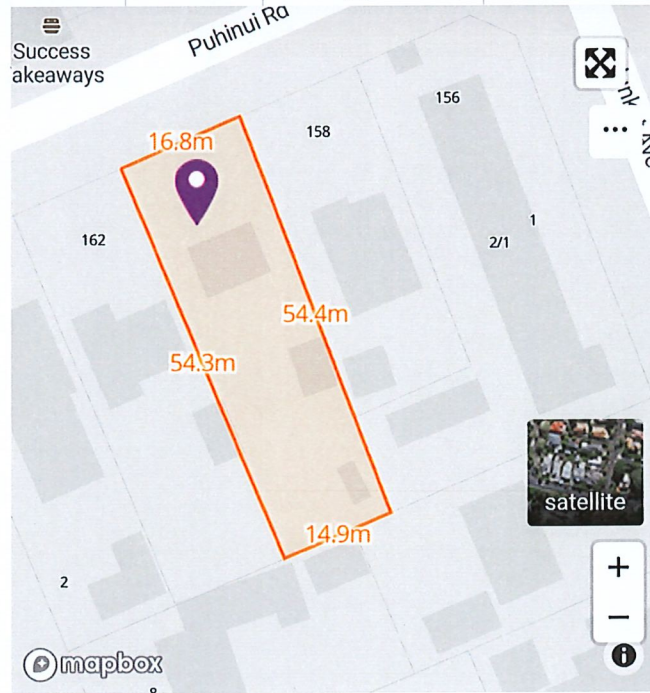
Commute



Unitary plan Zone



Underground services



### Market insights



190 Puhinui Road

Get an appraisal

Get an appraisal

### About the area



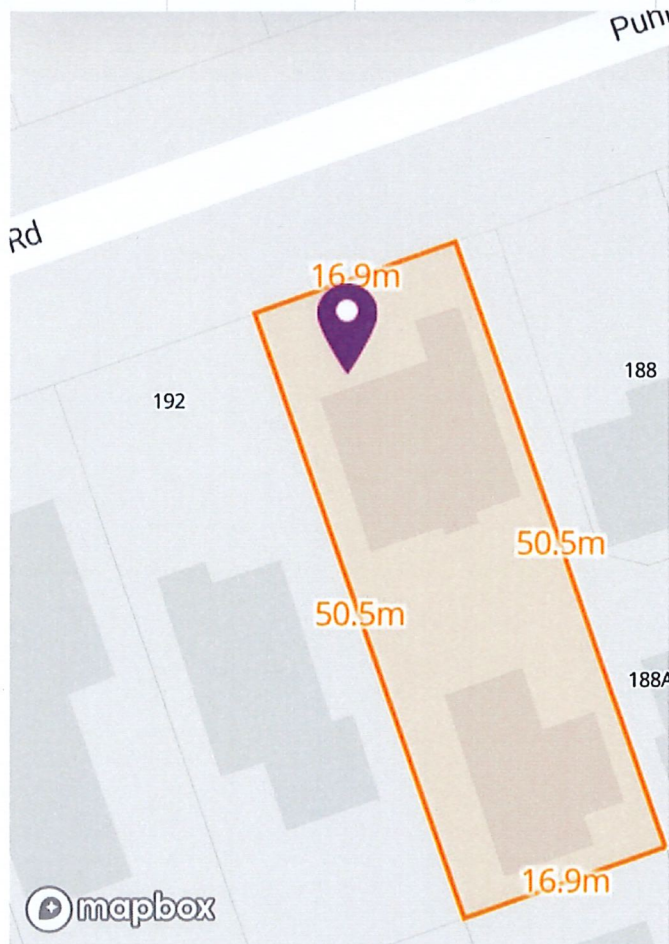
Schools



Commute



Unitary plan Zone





# 192 Puhinui Road

[Get an appraisal](#)

## About the area



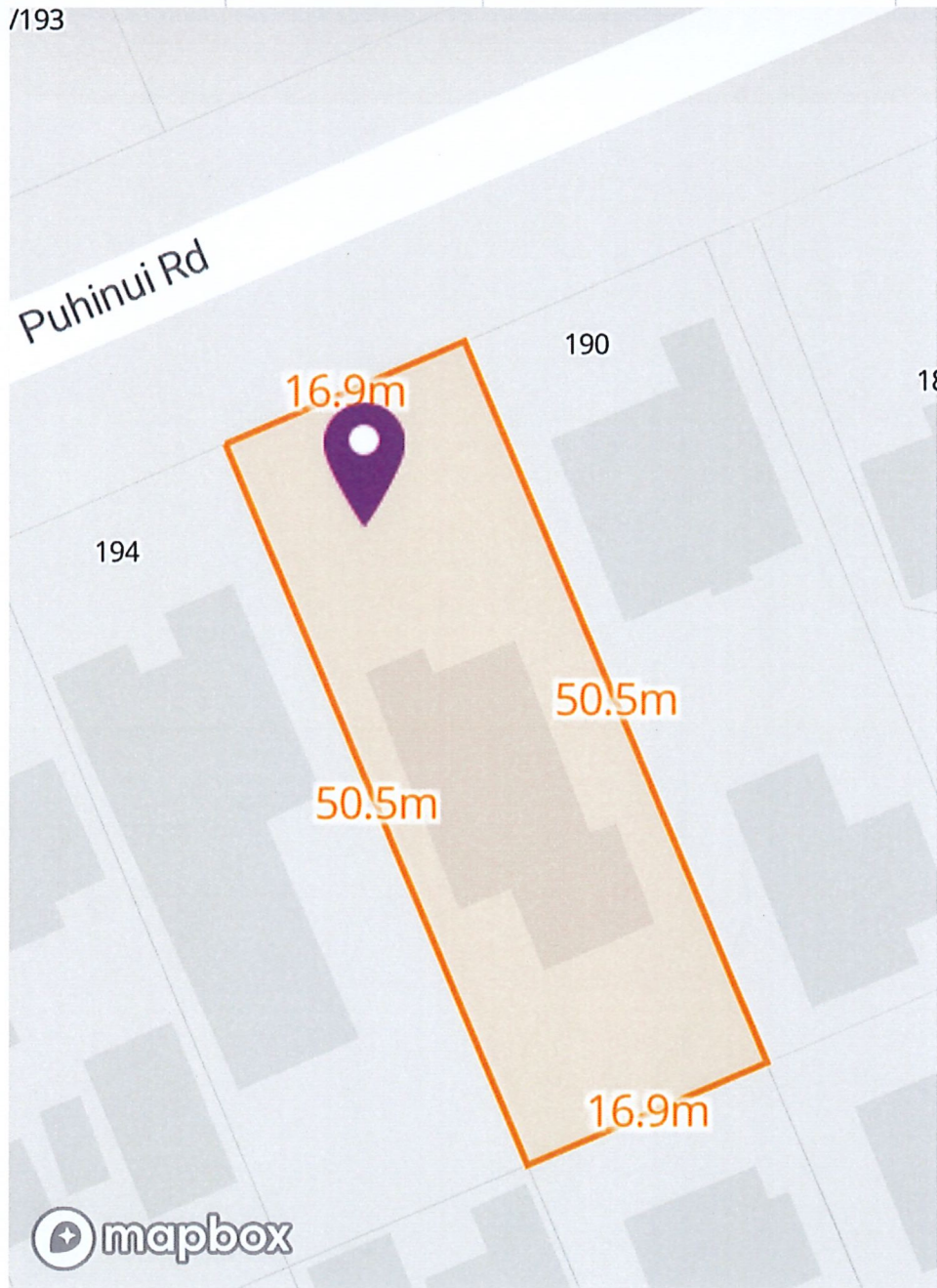
Schools



Commute



Unitary plan Zone



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:415] Notice of Requirement online submission - WEI CHAO KUAN  
**Date:** Thursday, 6 April 2023 8:45:51 am

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: WEI CHAO KUAN

Organisation name: Adelante Holdings

Full name of your agent: Jonathan Kuan

Email address: weichao1127@gmail.com

Contact phone number: +64220190509

Postal address:

5 Penwood close  
east tamaki heights  
auckland 2016  
East Tamaki Heights  
Manukau 2016

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Timing of agreed purchased date. Financial distress situation solution.

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

I oppose the plan majority for the timing of purchase, no clear directions for questions below: 1. What would be the plan from Auckland transport if I would need to sell the property anytime prior to the acquisition in 10-15 years? 2. What would be deemed as a qualified financial hardship situation, steps necessary for me to pursue? 3. If all above are satisfied, what would be the actual procedure? Sell the property to a vendor and claim shortfall from Auckland Transport vs Market price ? Or, Auckland Transport will negotiate a purchase price? 4. What is the likely chance of Auckland Transport changing the plan, as it will no longer require my property as part of the transport project. 5. Also, not sure why my property would need to be purchased, busway does not pass through my property.

I or we seek the following recommendation or decision from Auckland Council:

1. Response for all queries for owners suffering financial distress or change of plan.

Submission date: 6 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

### Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

MR JOHN HANSFORD

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

138 PUHINUI RD, PAPATOETOE

Telephone:

09-2780386

Fax/Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

The specific parts of the above notice of requirement that my submission relates to are: (give details):

THE PUTTING OF ANY " REQUIREMENT " ON MY PROPERTY

My submission is:

I or we support of the Notice of Requirement

I or we ~~oppose~~ oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

*J. C. Haugle*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

4 / 4 / 23

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

I am now 73 years old and has lived in my house for nearly 44 years. My wife and I have brought up two sons and even raised two of grandchildren. Over the years my reaction is great for children and always a safe place for fun. Even now my great grand daughter loves the garden which is full of trees and flowers etc. I have also got natives including totara, nikau, tee-toki plus many fruit trees including a couple plum peach, grapefruit, lemon and even a Macadamia tree. It is my piece of N.Z.

I like where I live because I am close to doctors, hospitals, Super Clinic etc. I am not as young as I was and have gone through Prostate and have Arteriosclerosis. Don't really need this at this time.

I lost my wife over 7 years ago she was a very rich lady who was on dialysis with renal problems, bad heart and diabetic for many years. Her my wife needed more and more help. I decided to stay at home to look after her as she no longer ~~drive~~ could drive. At this time we still had a mortgage we managed to still pay. As time passed my wife got worse and I was left on my own. I kept the mortgage going for a couple of years but found that things needed to be done around the house. So decided to take out

P.T.O.

a "REVERSE MORTGAGE" to repair and decorate what I needed to do. It also gives me a home for life which means I don't have to pay back the monies till even my death.

I am just looking for "LIFES INTREST"

I want it stopped like a lot of others do. Also I think I am doing my bit to look after the environment. I have a garden full of trees, bushes ect. I have already said I have Totara trees which attract Tui's. My garden is always full of various breeds of birds. I have been told if you bought my property I would get Market Price, but you are now deciding the Market Price. Does not look good for me as I am 73 years old. Will I be looked after?  
What is the time limit.

## Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

5 April 2023

Planning Technicians  
Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Dear Sir

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

In response to Auckland Council letter dated 10 March 2023.

We are the residents on Puhinui road, Papatoetoe and will object to destination process on our property/properties. There are many reasons that the vulnerable residents will impact from this construction and the livelihood and wellbeing of the residents will be lost.

The Auckland transport failed to provide a proper consultation with the residents of Puhinui road. The only two letters as dated received by the residents and Auckland transport neglected proper process.

There was one of the so-called 'community engagement' summaries in 2019 we found by digging through many layers of documents online. The residents of Puhinui road were not consulted or any information been shared.

The AT has failed to inform the affected residents and the owners were shocked when they received a letter that our property is at risk. It is a very unfair process and AT only consulted the general public and received only their opinion to increase the in favour of the project. AT has failed to door knock and spoke to the affected individuals.

The costs for the project will be over 2 billion, but Auckland transport has undervalued the cost to win funding from the government. It's a cunning plan from day one when AT never worked on true figures and hardly contacted or get public views for this project.

Not many have or excess to internet and some have English speaking difficulty. AT is trying to take away people's pride and many family homes without even their consent and proper consultation. Many people are not even aware that AT is interested in their property and to replace it with Bus line.

1. Puhinui residents are not aware of any partners and key stakeholders: presentations, small group meetings and one-on-one meetings as required; • potentially affected property owners/occupiers and businesses within the programme area: mail drops/ flyer, community open days, online information, visualisation, and one-on-one meetings as required; and • general public: community open days, online information and visualisation as stated by Auckland Transport.



2. We are appalled that AT seems to think we, as residents, have been 'consulted'. The maps used are very broad and general, and it is only with the benefit of hindsight that we can read them and see anything other than the bus lanes that have already been installed.
3. Apparently 'affected residents' only get few mails drop as dated above and chances to attend a couple of 'consultation' event via Teams. The businesses were meant to have had a 'drop in' from AT reps, though the ones we have spoken to have no recollection of such drop ins.
4. The dates shown on consultation was pandemic year and Residents were not able to go or get proper consultation. The residents of Puhinui road have just found out what they received those two letters from the Auckland Transport.
5. This is taking place in a city that's barely recovering from a global pandemic, where households have been hit by all types of hardships: physical, financial, emotional, etc. We residents worked hard and build a house and a family home for the future. Suddenly someone just want to wipe out our livelihood and future of our children and grandchildren.
6. It is unfair process AT. I am sure that there will be other means and ways to deal with this project without putting further hardship and mental and emotional stress to the residents. There is other alternative such as Cavendish Drive which is commercial and less destructive to the residential occupant.
7. Both Cavendish Drive and Puhinui road can be utilized and save hundreds of vulnerable families homes and same money can be used elsewhere.
8. Some houses were built within last four years, but the council or AT never informed the homeowners that their properties will be impacted in future. Very poor planning and lack of care has been seen.
9. Puhinui Road has been constructed so many times. Poor planners at AT and it costs taxpayers and rate payers so much unnecessary spending. Hundreds of Pohutukawa were planted and then destroyed by the AT on recent construction. That money could have been used and spent elsewhere.
10. There are many family homes and new homes built for the families and grandchildren and even designed for home base businesses. ie: 154 Puhinui Road, 172 Puhinui road and many others. Having to relocate it will be detrimental to the families.
11. There is shortage of housing in Auckland particularly in South Auckland. Some residents have brand new homes and invest lots of money and they are devastated after hearing that their home will be taken away from them. If compensated how much, a compensation will not fix the emotional stress which will be a lifetime one.
12. The current roading and walkway is sufficient for the public. The buses on Puhinui road goes empty every 10 minutes. There are hardly any passengers in the bus. Why such a big investment

and waste of ratepayer's money. The money could be used for other more important things eg: Housing and health. More facilities and parking at public hospitals.

13. The people and (Ratepayers) of Auckland need more housing and healthcare care including many other more important necessities. After the pandemic cost of living has gone skyrocketing and government intervention is imperative and funding is required. Funding needed for public safety from the government. It seems AT has no idea that other places contribution and funding is required rather than only focusing in roading. For the size of south Auckland population right now we have road to cater the population. Puhinui road doesn't require widening and it is unfair to take away homes from the vulnerable.
14. The bridge at the airport need widening and that should be a priority. Currently commutes facing difficulty to enter airport which is only two-line bridge. The AT planners should focus on more important issues right which is the bridge and other part of Auckland like harbour bridge.
15. There are some residents who operates businesses from home and those will immensely be affected. Relocating will be very costly and will impact on customers and their business. Most of us are just recovering from the Pandemic and AT has some came up some crocket ideas just before the next election.
16. There is other better planning can be possible with affecting the residents. At present Puhinui road is wide enough and used for the bus lines on each side and plus the cars etc. The walkway is wide enough to be shared with bike lines. The other alternative is that AT can purchase half mitre on both sides to allow the bike line separately. Some owners were told recently that only a metre of their land will be bought, there is mix and inaccurate information form the AT. This will be less costly, and the residents' properties can be saved the money could be used for other more important projects.
17. Therefore, market rate is not a fair since the homeowners will lose lifetime and interest for their lifetime. Whereas others who retain home and not affected still assessed at market rate. It will only fair to consider double the market rate to enjoy and purchase another property elsewhere. The government should change the law immediately under public act to stop taking properties and those affected for relocation. We don't live in communist country and our land should not be taken away by force.
18. The AT has already did road improvements on Puhinui Road during 2021-2022. It must have cost the taxpayers and rate payers millions of dollars. The road for the purpose is perfectly fine. Why AT would like to demolish the road and to redo it again. It is bad planning by AT. It has been a nuisance for many years of unnecessary constructions on this road.
19. There are few new homes are on build and why Auckland council gave permit to build. The new homes will be affected and the cost mount up for the homeowners.
20. Government should stop revisit the legislation and not to force homeowners to leave their loved home. In stream case if it became necessary to leave than government should pay double of the market value. This in ease the pressure and hardship on the homeowners to relocate or build a home for their future.

21. My family purchased a land on 154 Puhinui Road, Papatoetoe about 25 years ago and built a new 3-bedroom house. We worked hard and bought up our kids and we never thought of moving out. Kids grown up and in 2017 we re-built and extended brand new house. We invested quality products inside and outside the house because this is our family home.
22. We planned to live and basically die in this house. We never knew or thought of moving out from this house. Our grandchildren's future to stay closer to school, shopping, and office to run my business and to serve community as a JP for the past 25 years.
23. It devastating for my family once we received letter from AT. We never been consulted or been seen by any AT member. We are having a sleepless night as we get up in the morning and think that we going to lose our best home. We don't have any other property and put everything and life interest in this home.
24. It is very hard to buy a comparable house with a separate office nearby. Also, it will be difficult to get loan from the bank and many other factors. The other factors such as housing market and shortage. We rebuilt our house in 2017 and if we have to build with same spec it will cost more since the price of material has gone up.
25. After talking to AT once few weeks ago, I was advised that they will start purchasing houses around 2026-2027. It was a shock to us and since then we are very upset and worried. There was no proper consultation and AT and the planners are at fault and deceived us for having a proper consultation.
26. Recently we heard that one property is already bought by AT. I have been told property at 1/199 Puhinui road has been purchased by AT. The project hasn't been gone ahead or approved yet, why and how AT could purchase this property. It is matter of interest that how matters are hidden under the carpet. Where taxpayers' money is spent unnecessary. The residents are kept in limbo and the matter is not transparent. The public works Act is too old and need immediate revision.
27. It is evident from the recent comments from the public after the Stuff NZ news on 20<sup>th</sup> October 2022, that this project and destroying over 400 homes will be waste of taxpayers' money. Light rail will be sufficient to replace bus line with a track.

[Hundreds of Auckland homeowners could lose land to busway project | Stuff.co.nz](#)

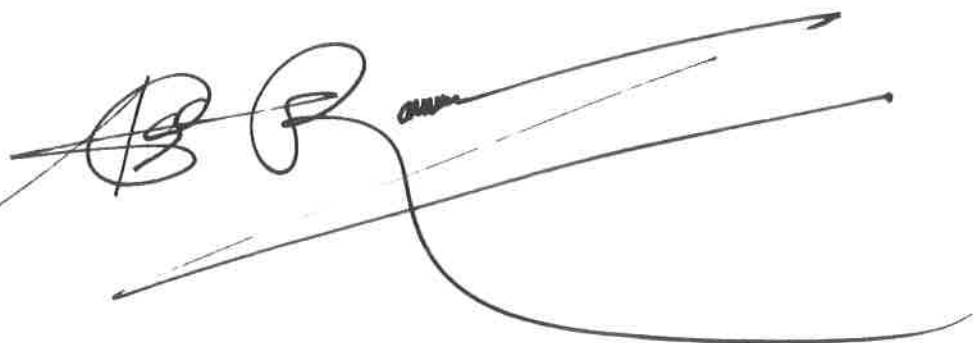
28. Puhinui road is heavily populated with residents and school. It will be unsafe to build a motorway on this street. Whereas Te Irirangi Drive- straight through Cavendish drive -via Clendon Road will be better choice while it is more of a commercial area. The residents don't want a motorway and through heavily populated residential area on Puhinui road, considering Puhinui primary school and childcare facilities on Puhinui road.
29. The residents on Puhinui road are protesting to the Government /Auckland Council, Auckland Transport and Waka Kotahi NZ to refrain from taking our properties and our life interest.

- 30. Since the Puhinui residents came to know that they may lose their homes, so they will not do any home improvement. This street will look ugly, and they will not be able to get a true value on their property. The government should look at changing the Public Works Act so that in this case people are properly compensated if their properties are affected.
- 31. Having a happy family and a nest (House) for the family is very important to any individual. It the most expensive asset that one can have in a lifetime. No one would like their nest to be taken away so easily. It is cruel and greedy that AT and government to any individual. AT can afford to buy our homes but we poor citizens can't afford to build or buy same house elsewhere. We are getting old. Please don't destroy our hard-earned asset and our precious temple. Cost of relocation will be daunting and very stressful and costly. This news and project driving people towards mental illness.
- 32. There are many public and homeowners support to stop this impact and stress on well settled residents. The government should intervene and find some other alternative to concur this serious issue. Just STOP these and take off the designation on the property titles on our properties. We all are in extreme stress and having a sleepless night and some owners getting emotionally stressed because there are no counselling services were provided. AT will be responsible for homeowners illness.
- 33. We request government and Ministers to intervene and stop this project going forward and use other alternative route such as Cavendish Drive that was initially planned. And do not run a motorway in the middle of heavily populated residential homes and schools.
- 34. **We have attached 33 signed objections – to stop taking our nest away and stop designation process or make any changes.**

Homeowner/ home business:

Kamlesh Rana JP  
Immigration Adviser  
Marriage Celebrant

154 Puhinui Road, Papatoetoe Papatoetoe

A large, stylized handwritten signature in black ink, appearing to be 'Kamlesh Rana', is written over the signature line. The signature is written in a cursive, somewhat abstract style with long, sweeping strokes.

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Ashok & Aneeta Krishna

Address: 85 Puhinui Road, Papatoetoe

Phone Number: 0211229969

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Name: JOHN SADD

Address: 196 PUHINUI ROAD

Phone Number: 0211272046

Signature: 

Come to visit

JOHNNY ISAAC 22 @gmail.com

Please fill the above form, sign this petition and either drop off in my letter box

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: KENENDRA SWAMY (JAMES)

Address: 2/179 PUHINUI ROAD, PAPATOETOE

Phone Number: 022 - 5263757

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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The Homeowner/s  
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Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: MAXINE DEER

Address: 1/148 Puhinui Road Papatoetoe

Phone Number: 021-02422149

Signature: 

Household of 4 kids 14, 10, 9, 5  
And myself.

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

Or phone to pick: 0275267262



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Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Suphraj Rana

Address: 93 a Puhinui Road Papatoetoe

Phone Number: 022 530 586

Signature: [Handwritten Signature]

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Name: CHRIS HANS

Address: 2/187 PUHINUI RD

Phone Number: 021 566 783

Signature: 

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Name: PHUONG

Address: 136 Puhinui Rd

Phone Number: 021 252 1832

Signature: 

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: ABDUL SHARIF

Address: 205 PUHINUI RD

Phone Number: 0210587614

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: CHANDRA LATA SINGH

Address: 190A PUHINUI ROAD, PAPATOETOE

Phone Number: 02102489389

Signature: CLK

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

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Name: UDAY SINGH

Address: 190A PUHINUI ROAD, PAPATOETOE

Phone Number: 0211219151

Signature: 

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At:

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Papatoetoe

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Papatoetoe**

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Aaron Chand

Address: 124 Puhinui road

Phone Number: 0271609813

Signature: Aaron

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

Or phone to pick: 0275267262



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Papatoetoe

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Name: Avilash Chand

Address: 124 Puhinui Road

Phone Number: 0210513710

Signature: 

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Name: REGNA RANI / MANI

Address: 1/103 PUHINUI RD, PAPATOETOE

Phone Number: 0272295022 / 0277103007.

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

A note from a homeowner on Puhinui Road:

It was great meeting you in person to discuss the impact on the properties which are located on Puhinui Road. We are also residents which are being impacted by the future development. We have been living here since 2009 and it's truly shocking and unfortunate that we may lose our property which we have worked so hard to attain. This home has been our treasure and it hurts to be forced to give it.

I am wondering if the project is planned in the next 30 years, in which case I wonder why we are affected 25-30 years before it takes place. A similar situation happened to residents on Redoubt Road. I have heard that a few properties have been claimed 4-5 years back and there has still been no development. This resulted in the properties being rented now.

We do not want to face a similar situation. Why would we sell our properties at current market rates now when the property values are declining? Hypothetically, after 20-30 years from now, property values may increase, and development may still not have occurred. Resulting in our loss of our property for nothing and a loss. We are the ones being impacted by this heavily.

It does not make sense to be selling the property at current market rates as in the future the properties may be further developed. This would take away from possible investment opportunities for the homeowners and their future which relies on their property. We have future plans to develop our property for our children and grandchildren which is now at risk.

Relocation at current times is extremely difficult as the homes are extremely close to necessities daily. As most properties in Auckland are extremely expensive it would be near impossible to find a property at a similar calibre as the ones we own.

Regards,

Reena and Manjinder

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Sandeep Kumar and Geeta Bhardwaj

Address: 3/89 Puhinui Road, Papatoetoe

Phone Number: 0211281831

Signature: Geeta / [Signature]

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Name: Rawandeep Kaur

Address: 186A Puhinui Road Papatoetoe

Phone Number: 0224329794

Signature: R. Kaur

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Manginder Singh Birn

**Address:** 186 Puhinui Road, Papatoetoe

**Phone Number:** 0212146922

**Signature:** Manginder Singh Birn

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Champat Patel

**Address:** 165 Puhinui Rd. Papatoetoe

**Phone Number:** 021 022 60547

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

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Name: NIRAJ BHUTANI + ABHA WALIA

Address: 119 Puhinui Rd, Papatoetoe

Phone Number: 0211005791, 021 0296 7474

Signature: Niraj Bhutani Abha Walia

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
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Or phone to pick: 0275267262



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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Mohammed & Sazia Khalil

Address: 264 & 264a Puhinui Rd. Papatoetoe

Phone Number: 02102738836

Signature: 

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At:

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Papatoetoe

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Kia Ora *Dairy shop owner.*

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: *Bhavesh Patel*

Address: *284 Puhinui rd*

Phone Number: *0211571719*

Signature: *B. Patel*

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: MARIE STUCKMAN

Address: 154 WYLLIE ROAD

Phone Number: 02107 83342

Signature: MBL

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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Papatoetoe**

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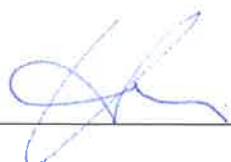
Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Amy Bui

Address: 219 Puhinui Road, Papatoetoe

Phone Number: 021 030 6983

Signature: 

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*and the NZ Government*

**Name:** JOHN HANSFORD

**Address:** 138 PUHINUI RD, PAPATOETOE

**Phone Number:** 09-2780386

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: J GOULD

Address: 306 PUHINUI RD

Phone Number: 0272903306

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: BAL KRISHNA

Address: 2/199 PUHINUI ROAD - PAPATOETOE

Phone Number: 021964090

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

**Please Act now before it's too late:**

**The Homeowner/s  
On Puhinui Road  
Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** LES + CAROLINE TANA-TEPANIA

**Address:** 132 Puhinui RD

**Phone Number:** 021 792 025

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** GIANG THI LAM TRAN & TRUONG CONG NGUYEN

**Address:** 200 PUHINUI RD - PAPATOETOE.

**Phone Number:** 02108225414.

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Polly Ngakhe Walker

Address: 193 Puhinui Rd

Phone Number: 0275147866

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

**Please Act now before it's too late:**

**The Homeowner/s  
On Puhinui Road  
Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: LOKESH GERA

Address: 104A, PUHINUI ROAD, PAPATOETOE, AUCKLAND

Phone Number: 020415 77753

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Sharon Howell

Address: 2/193 Puhinui Rd

Phone Number: 0212573460

Signature: S. Howell

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**


Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Fa'ana Campbell

Address: 148A Puhinui Road, Papatoetoe

Phone Number: 022 1990 187

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Khan Magbool

Address: 2 Ranfurly Rd Papatoetoe.

Phone Number: 022 032 8440

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:422] Notice of Requirement online submission - Birgitta Sherley Prom  
**Date:** Thursday, 6 April 2023 4:20:21 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Birgitta Sherley Prom

Organisation name:

Full name of your agent:

Email address: sherley\_art@yahoo.co.nz

Contact phone number: 0210738528

Postal address:  
202 Te Irirangi Drive  
Flat Bush  
Auckland 2019

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

1. For safety reasons. It will be very difficult for us to enter and exit my property with the amount of space left at the front. It is not possible to turn around. To enter and exit, it will not be safe as we have to reverse. With children especially 2. It will be very difficult for us to sell our property at a good reasonable price as access to the property will be very limited.

I or we seek the following recommendation or decision from Auckland Council:

I would like this notice not to go through. I am opposed to it as this will be affecting not only our safety but also our life. If this notice come through, Auckland Council needs to buy my property as soon as the hearing result comes as it would be really difficult to sell with a good reasonable market price.

Submission date: 6 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal

- details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:423] Notice of Requirement online submission - Wiri Business Association Inc  
**Date:** Thursday, 6 April 2023 6:30:39 pm  
**Attachments:** [Submission on NOR - WBA \[F\].pdf](#)

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Wiri Business Association Inc

Organisation name: Wiri Business Association Inc

Full name of your agent:

Email address: gary@wiribiz.org.nz

Contact phone number: 0274 966283

Postal address:  
13 Inverell Avenue  
Wiri  
Auckland 2104

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:  
The entire Notice of Requirement

Do you support or oppose the Notice of Requirement? I or we are neutral to the Notice of Requirement.

The reason for my or our views are:  
See attached supporting document

I or we seek the following recommendation or decision from Auckland Council:  
See attached supporting document

Submission date: 6 April 2023

Supporting documents  
Submission on NOR - WBA [F].pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal

- details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**Submission on Notice of Requirement:  
Puhinui Station in the vicinity of Plunket Avenue to SH20/SH20B Interchange**

**Wiri Business Association**

**Summary**

The Wiri Business Association ('WBA') is neutral regarding to the Notice of Requirement and holds concerns about the following likely negative impacts on businesses or communities accessing businesses from the proposal:

1. disruption caused by construction, such as reduced amenity and health outcomes due to construction noise, dust and vibration impacts, as well as loss in local open space and community facilities.
2. negative visual impacts due to the establishment of hoarding and changed wayfinding during construction.
3. increased traffic congestion resulted in road blockages, truck and heavy vehicle movements and cumulative impacts associated with other construction of nearby projects.
4. reduction in parking availability due to changed road conditions and demand for parking from the construction workforce.
5. loss in revenue for local businesses directly affected by construction as road blockages or disruptive construction may redirect regular businesses customers.
6. loss of local employment/ livelihood due to acquisition of local businesses or businesses voluntarily relocating to avoid significant construction impacts.
7. workers' safety being compromised due to potentially poor safety policy and monitoring (perhaps even fatalities and/or severe workplace incidents occurred).
8. changes to pedestrian and vehicular accessibility to the town centres, including commercial and residential land use.
9. changes to local road access and through-routes.
10. changes to community character and sense of place due to loss or modification to valued local businesses.
11. loss of businesses serving smaller communities.
12. loss of employment and livelihood as a result of property acquisition or business disruption.

To avoid, remedy or mitigate these effects, the WBA asks that the proposal especially include a detailed Development Response Management Plan (DRMP) to be implemented prior to the start of construction.

**Introduction**

13. The WBA is an incorporated society (1807794) having its office at 13 Inverell Avenue, Wiri. The WBA is also a business improvement district (BID) within the Auckland Region formed in 2006 with a focus on reducing crime within Wiri. Since 2006, the WBA has achieved significant success in crime reduction and also broadened its role to encourage greater economic activity. The WBA now has approximately 1,500 members and covers a territory of 684 hectares. [Link](#) A map of the entire WBA area is available [here](#). A map of the northern part of the WBA area is available in the Appendix of this Submission. The WBA and Wiri area are also described at Section 1.1 of the Social Impact Assessment for the Notices of Requirement (NORs).<sup>1</sup>
14. The WBA welcomes the opportunity to make submissions on the NOR 3 – Puhinui Station in the vicinity of Plunket Avenue to SH20/SH20B Interchange, which is one of four Notices of Requirement being sought for the Airport to Botany Bus Rapid Transit Project. See the Description in the Appendix of this Submission.
15. Key features of the overall Airport to Botany Bus Rapid Transit Project include: (i) a dedicated Bus Rapid Transit corridor, centre-running for the majority of the corridor along Te Irirangi Drive, Great

<sup>1</sup> Volume 4, Airport to Botany Social Impact Assessment (December 2022). [Link](#)

South Road, Ronwood Avenue, Manukau Station Road, Lambie Drive, and Puhinui Road. West-running on Davies Avenue along the edge of Hayman Park; (ii) Bus Rapid Transit stations at Dawson Road, Diorella Drive, Ronwood Avenue, Manukau Station, and the corner of Lambie Drive and Puhinui Road Station; (iii) walking and cycling facilities on both sides of the corridor; (iv) priority access for fire engine movements across the Bus Rapid Transit corridor at Papatoetoe Fire Station; (v) new signalised intersections at Mitre 10 and Bunnings Warehouse, Lambie Drive and Ronwood Avenue, and Puhinui Road and Plunket Avenue; (vi) swales and wetlands; and (vii) areas for construction related activities including yards, site compounds, and bridge and structure works. [Link](#)

16. More particularly, the key features of NOR 3 – Puhinui Station in the vicinity of Plunket Avenue to SH20/SH20B Interchange include: (i) a dedicated Bus Rapid Transit corridor, centre-running along Puhinui Road connecting to the Puhinui Station concourse via a new Bus Rapid Transit bridge structure; (ii) a Bus Rapid Transit station at Puhinui Station; (iii) walking and cycling facilities on both sides of the corridor; (iv) walking and cycling facilities will be provided along Cambridge Terrace, Bridge Street and Kenderdine Road; (v) wetland; and (vi) areas for construction related activities including yards, site compounds, and bridge and structure works. [Link](#)

### Submissions

17. The Notice of Requirement being submitted on by the WBA is the third Notice of Requirement being sought for the Airport to Botany Bus Rapid Transit Project (NOR 3 – Puhinui Station in the vicinity of Plunket Avenue to SH20/SH20B Interchange).
18. The submission relates to the entire Notice of Requirement.
19. The WBA is neutral regarding the Notice of Requirement.
20. The WBA will not gain an advantage in trade competition through the submission.
21. The decision the WBA seeks from the Council is to have regard to our submissions on the Notice of Requirement.

### Reasons for being neutral regarding the Notice of Requirement

22. Our reasons for being neutral regarding NOR 3 – Puhinui Station in the vicinity of Plunket Avenue to SH20/SH20B Interchange are set out below and include the following:
- a. general impacts on businesses
  - b. access effects on businesses
  - c. parking effects on businesses
  - d. effects on freight movements
  - e. construction noise and vibration effects

### General impacts on businesses

23. As discussed, in Section 5.3 of the Social Impact Assessment of the NOR,<sup>2</sup> the following are some of the likely negative impacts on businesses or for communities accessing businesses, from the proposal:
- a. disruption caused by construction, such as reduced amenity and health outcomes due to construction noise, dust and vibration impacts, as well as loss in local open space and community facilities.
  - b. negative visual impacts due to the establishment of hoarding and changed wayfinding during construction.
  - c. increased traffic congestion resulted in road blockages, truck and heavy vehicle movements and cumulative impacts associated with other construction of nearby projects.

<sup>2</sup> Volume 4, Airport to Botany Social Impact Assessment (December 2022). [Link](#)

- d. reduction in parking availability due to changed road conditions and demand for parking from the construction workforce.
- e. loss in revenue for local businesses directly affected by construction as road blockages or disruptive construction may redirect regular businesses customers.
- f. loss of local employment/ livelihood due to acquisition of local businesses or businesses voluntarily relocating to avoid significant construction impacts.
- g. workers' safety being compromised due to potentially poor safety policy and monitoring (perhaps even fatalities and/or severe workplace incidents occurred).
- h. changes to pedestrian and vehicular accessibility to the town centres, including commercial and residential land use.
- i. changes to local road access and through-routes.
- j. changes to community character and sense of place due to loss or modification to valued local businesses.
- k. loss of businesses serving smaller communities.
- l. loss of employment and livelihood as a result of property acquisition or business disruption.

To avoid, remedy or mitigate these effects, the WBA asks that the proposal include a detailed Development Response Management Plan (DRMP) to be implemented prior to the start of construction to provide a framework to assist businesses affected by the Project during construction. As set out in Section 9.6.4 and 11.2.4.10 of the Assessment of Effects on the Environment of the NOR, this would be a Condition and broadly include: – Recommendations for measures to be undertaken to manage the impacts of Construction Works on the identified businesses; – A summary of any proactive assistance provided to impacted businesses; and – Identification of opportunities to co-ordinate the forward work programme, where appropriate with infrastructure providers and development agencies. A more detailed discussion of the proposed DRMP is included in the Social Impact Assessment of the NOR (especially at pages 52 to 54).

#### Access effects on businesses

24. Section 9.3.4.1 of the Assessment of Transport Effects of the NOR,<sup>3</sup> identifies that the following are some of the likely negative access effects on businesses from the proposal:
- a. The Project corridor will impact the layout of vehicle crossings within the road reserve (and in some instances within private lots). Most driveways will need to be reformed to tie in adequately with Puhinui Road;
  - b. All properties currently gain all-movements access onto Puhinui Road. Due to the central BRT corridor, all properties will be restricted to left turn in / out movement (i.e. right turns prohibited). The alternative routes will add up to 2.5 km of travel distance;
  - c. For rear sites with the front lot designated, driveways will have be constructed to enable access to the rear lot.

25. The WBA asks that the proposal avoid, remedy or mitigate these effects on businesses.

#### Parking effects on businesses

26. Section 9.3.4.2 of the Assessment of Transport Effects of the NOR,<sup>4</sup> identifies that 21 on-street public parking spaces and approximately 20 on-site parking spaces will be negatively affected by the proposal. In particular, the NOR identifies the business at 316 Puhinui Road (Safestore) as being negatively affected.

27. The WBA asks that the proposal avoid, remedy or mitigate these effects on businesses.

<sup>3</sup> Volume 4, Airport to Botany Assessment of Transport Effects (December 2022). [Link](#)

<sup>4</sup> Volume 4, Airport to Botany Assessment of Transport Effects (December 2022). [Link](#)

Effects on freight movements

28. Section 9.3.5 of the Assessment of Transport Effects of the NOR<sup>5</sup> identifies that Puhinui Road (currently classified as Level 3 under the Auckland Transport Freight Plan), will be affected by the proposal. This corridor will likely be negatively affected by the NOR.
29. The WBA asks that the proposal avoid, remedy or mitigate these effects on businesses.

Traffic noise effects

30. Section 8.0 of the Assessment of Traffic Noise Effects of the NOR,<sup>6</sup> identifies a number of buildings as sensitive receivers of traffic noise effects.
31. The WBA asks that the proposal avoid, remedy or mitigate these effects on any businesses.

Construction effects

32. Section 9.3.2 of the Assessment of Effects on the Environment of the NOR,<sup>7</sup> identifies several likely traffic management effects on businesses, including: (i) temporary traffic diversions (which will be required to facilitate the construction activities as the proposed Project works will be adjacent to or on existing road corridors); (ii) full road closures and diversions for some activities; (iii) adjustments to intersections to accommodate diverted traffic; (iv) construction traffic movements (to accommodate the movement of earthworks which will likely result in an increase in traffic volume on construction routes used during the construction of the Project); (v) construction vehicles (which will include truck movements (heavy), light delivery and staff/contractor vehicle movements (light); (vi) road safety (impacts from site access points, posted speeds and sight lines for construction); and (vii) existing driveways (those that remain during construction will be required to have temporary access provision through temporary traffic management controls).
33. The WBA asks that the proposal avoid, remedy or mitigate these effects on businesses.

Construction noise and vibration effects

34. Section 8 of the Assessment of Construction Noise and Vibration Effects of the NOR<sup>8</sup> identifies likely sensitive receivers to construction noise and vibration effects.
35. The WBA asks that the proposal avoid, remedy or mitigate these effects on any businesses.

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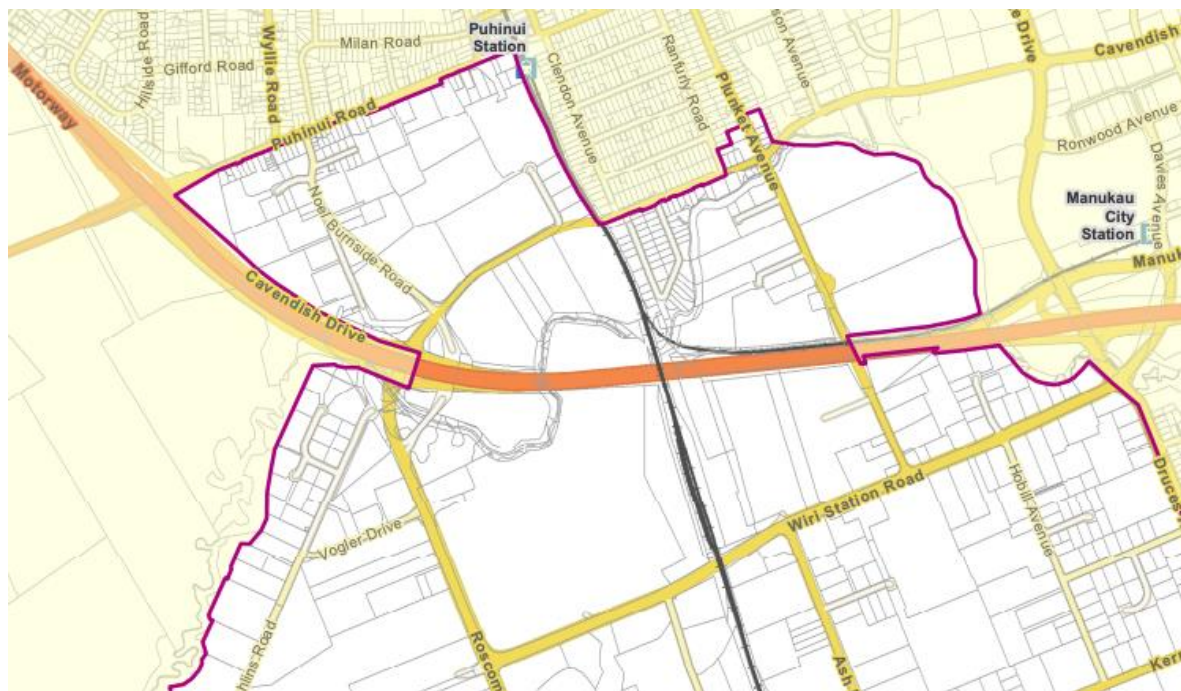
<sup>5</sup> Volume 4, *Airport to Botany Assessment of Transport Effects* (December 2022). [Link](#)

<sup>6</sup> Volume 4, *Assessment of Traffic Noise Effects* (December 2022). [Link](#)

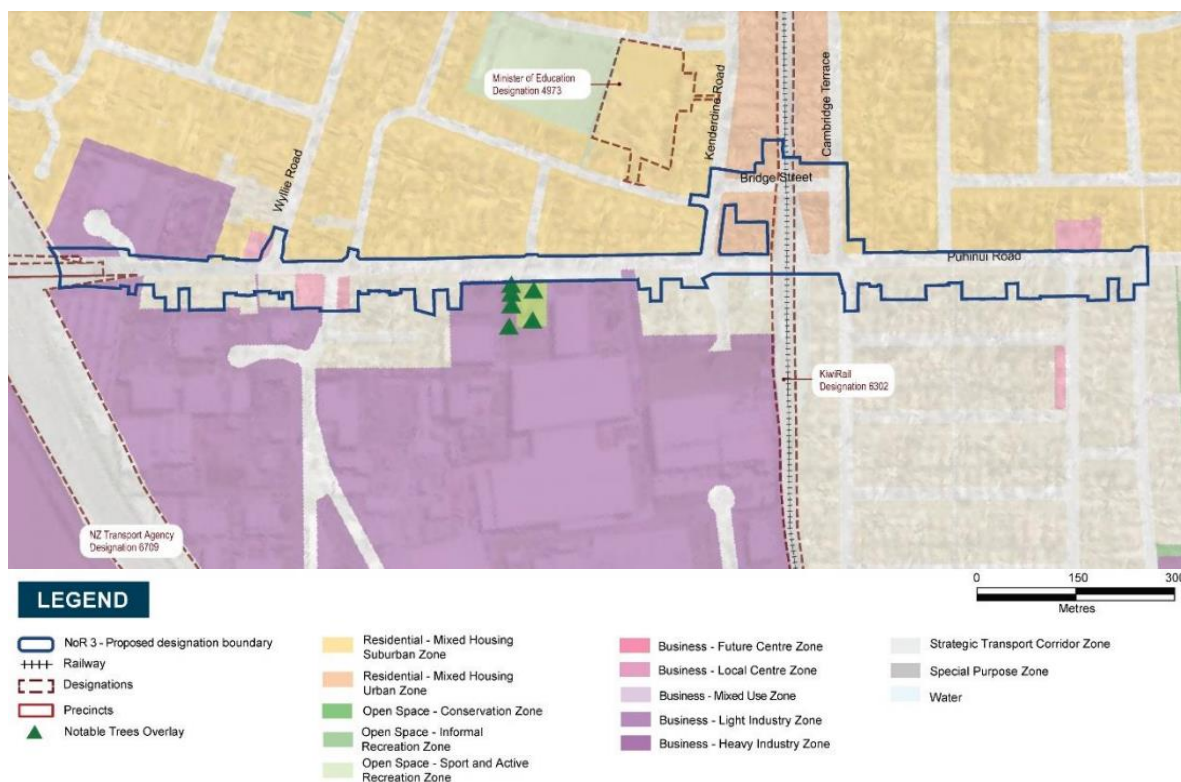
<sup>7</sup> Volume 2, *Assessment of Effects on the Environment* (December 2022). [Link](#)

<sup>8</sup> Volume 4, *Assessment of Construction Noise and Vibration Effects* (December 2022). [Link](#)

APPENDIX



WBA BID Boundaries (near Puhinui Station)



NOR 3 (Puhinui Station in the vicinity of Plunket Avenue to SH20/SH20B Interchange)





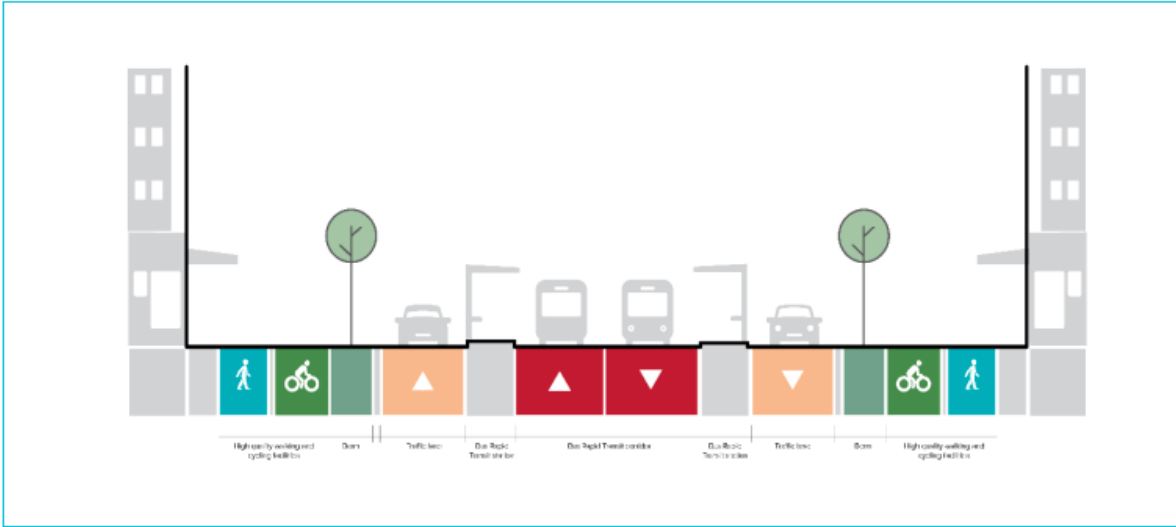
**NoR 3 – Puhinui Station, in the vicinity of Plunket Avenue to SH20/20B Interchange**



**Key features**

BRT Corridor	Centre-running along Puhinui Road connecting to the Puhinui Station concourse via a new BRT bridge structure
BRT Stations	Puhinui Station
Walking and cycling facilities	<ul style="list-style-type: none"> <li>Walking and cycling facilities on both sides of the corridor; and</li> <li>Walking and cycling facilities will be provided along Cambridge Terrace, Bridge Street and Kenderdine Road.</li> </ul>
General traffic	One lane in each direction on Puhinui Road
Access	Limited right turn access
Speed environment	50 km/h
Signalised intersections	<ul style="list-style-type: none"> <li>Puhinui Road and Noel Burnside Road; and</li> <li>Puhinui Road and Wyllie Road.</li> </ul>
Stormwater infrastructure	<ul style="list-style-type: none"> <li>Wetland</li> </ul>

**NoR 3 typical cross**



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:428] Notice of Requirement online submission - Nigel Stickland  
**Date:** Saturday, 8 April 2023 9:00:33 am

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The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Nigel Stickland

Organisation name: Manukau Auto & Tyre Centre

Full name of your agent: Nigel Stickland

Email address: [nigel@magsandtyres.co.nz](mailto:nigel@magsandtyres.co.nz)

Contact phone number: 0274939301

Postal address:  
135 Awa Awa Rd Ruby Bay  
Tasman  
7173

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:  
Taking away our carparks which are vital to the business

I or we seek the following recommendation or decision from Auckland Council:  
Adjust the route so we don't lose carparks

Submission date: 8 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:434] Notice of Requirement online submission - Jasvinder Singh and Harmeet Kaur Sokhi  
**Date:** Sunday, 9 April 2023 2:45:52 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Jasvinder Singh and Harmeet Kaur Sokhi

Organisation name:

Full name of your agent:

Email address: [dimple\\_sokhi983@hotmail.com](mailto:dimple_sokhi983@hotmail.com)

Contact phone number: 0210343962

Postal address:

12 station road

Papatoetoe

Auckland 2025

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

We are submitting this submission without any legal advice but have only spoken to "Friend of Submitters", who have suggested that this form can be completed by anyone and does not need to be in legal language as we will be given chance to talk more at the future meetings in regards to this matter and also can amend later on if required. We do oppose this NoR due to the following key points: 1) We have brought this property for our kid's secure future (I have 3 little kids). We had plans that we were going to put into action in the next few years. We had plans to build this property by either Airbnb houses OR as a commercial shopping center with a coffee shop/bakery with the option to have a home upstairs. We already have been speaking/having meetings with our architect and were in the process of planning this project officially. We currently have two houses on the property (our property is the corner section with two mailing address-211 Puhinui Road and 108 Kenderdine Road, Papatoetoe). 2) Our plan B if the above was not feasible, was to build a big family home as we are a joint family, hence the first reason we have secured this large section in order to build the family home as this location is close to all the amenities. 3) As you are aware that the cost of living is ever-increasing and we would not be able to find another apple-to-apple house with land, which is central, desirable, and situated conveniently close to local amenities.

I or we seek the following recommendation or decision from Auckland Council:

We would be appreciative if we could discuss this further via meeting and have some assistance.

Submission date: 9 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:441] Notice of Requirement online submission - Lee mee THEN  
**Date:** Monday, 10 April 2023 1:30:39 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Lee mee THEN

Organisation name:

Full name of your agent:

Email address: happy2know13@gmail.com

Contact phone number:

Postal address:

Manukau city  
Auckland 2104

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

1) Noise n environmental pollution during construction and worst of all, after the work because of extensive human footfall n traffic conditions, 2)safety issue to all residents at 18 Ronwood Ave, 3)the requirement serves no purpose to the plan as the space doesn't enhance anything at a great waste of tax oayers m9ney 4) it will severely negative impact ALL of the residents' quality of life

I or we seek the following recommendation or decision from Auckland Council:  
NOT to carry it out

Submission date: 10 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [RealEstate.AU@jw.org](mailto:RealEstate.AU@jw.org)  
**To:** [Unitary Plan](#)  
**Subject:** Submission: NOR 3: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)  
**Date:** Monday, 10 April 2023 5:10:22 pm

---

Attn: Planning Technician - Auckland Council

Dear Sir/Madam

I write to you from the Australasia Branch Office of Jehovah's Witnesses who represent: **Jehovah's Witnesses – Manukau Kingdom Hall Trust** the legal owners of the property located at: **222 Puhinui Road, Papatoetoe.**

We would like to lodge a submission on the **NOR 3: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport).**

Here are various points for your consideration:

- Will a portion of our land be compulsory acquired for this project?
- Will we lose car parking spots on our property? This is not desirable as it affects our usage of the property.
- Will there be any impact to the access of the property during construction?
- Will there be any impact to the access of the property post construction? ie. will the potential loss of the nearby roundabout mean left only turn in, increasing route distance for members?
- Will there be increased noise post construction?

We do not object to the Notice of Requirement but look forward to resolving the above concerns through the normal processes. Thank you.

Regards,

-Joshua Sapienza

**Australasia Branch | Local Design/Construction Department | Real Estate**

PHONE: +61 2 8203 9338 | MOBILE: +61 421 286 210

[www.jw.org](http://www.jw.org)

IMPORTANT NOTICE: This e-mail (which includes any attachments) is for the sole use of the intended recipient(s). It is confidential and may contain privileged information or otherwise be protected by law. If you are not the intended recipient, please notify us immediately and permanently delete the e-mail. Any unauthorised review, use, or disclosure is prohibited. Any pre-contractual arrangements are not binding unless and until a formal agreement or deed is executed by all parties and exchanged. While we take security very seriously, it is your responsibility to ensure this e-mail is not affected by viruses or defects. We do not accept liability for any loss or damage whatsoever that may result from reliance on, or the use of this e-mail (including but not limited to from viruses and defects).

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:444] Notice of Requirement online submission - Reena Rani  
**Date:** Monday, 10 April 2023 5:15:43 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Reena Rani

Organisation name:

Full name of your agent:

Email address: karwal.reena@gmail.com

Contact phone number:

Postal address:  
1/103 Puhinui Road  
Papatoetoe  
Manukau 2104

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

I have lived in this house for several years, a critical part of my life. This is the only place of such convenience to schools, transportation, recreational parks, and other facilities like this. My house is large and spacious for my family and me. My kids have recently entered adulthood and are venturing into the wider world, so this location is vital for their growth as they have plentiful space to work towards their future as part of New Zealand. The house is a centralized gateway to society for us and has significant value. As an initial immigrant, finding a home had been difficult. After years of hard work, we could finally afford this house, and now, relocating results in a financial burden and a loss of something more than just a home for us. It is where my children were raised and the development of our dedication in New Zealand. This house is where we would like to welcome new members to our family. In addition to this, house prices in Auckland are extremely expensive. Auckland Council will further impact the housing crisis in Auckland negatively due to more people who will be without a home.

I or we seek the following recommendation or decision from Auckland Council:

I seek that Auckland Council cancel or adjust this project so we can save our homes.

Submission date: 10 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

I accept and agree that:



- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:445] Notice of Requirement online submission - Michelle Joy Te Hira  
**Date:** Monday, 10 April 2023 5:30:52 pm  
**Attachments:** [Alternatives-Volume 2-Appendix A-Version 1.pdf](#)  
[Option 2.pdf](#)  
[Marked in Yellow-an alternative route.pdf](#)

---

The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Michelle Joy Te Hira

Organisation name:

Full name of your agent:

Email address: [mjtehira@hotmail.com](mailto:mjtehira@hotmail.com)

Contact phone number:

Postal address:  
Flat 2 93 Kenderdine Road  
Papatoetoe  
Auckland 2025

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Loss of partial land at properties at 1/93 Kenderdine Road, Papatoetoe and 2/93 Kenderdine Road, Papatoetoe, Auckland 2025

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

The designated proposed plan cuts straight across the front of both properties and will remove our access to be able to park our cars safely and securely, this affects our insurance on our motor vehicles. Hazardous for occupants of both Units due to traffic being brought closer. Sloping section with sewage pipes already less than 100mm underground. Our Wastewater pipes are below street and need to be pumped up, failure to do so will affect in floods and outpours of water from our pump if interfered with. Restrictions to waste water. During construction damage to brick houses through vibrations. No power, water, internet, sewage and safe access to property whilst construction site in place. Noise pollutions/restrictions will affect us while we are living at the property with construction. Environmental issues will occur regarding accidents as traffic down Kenderdine road and traffic fails to stop at designated stop sign. We believe this is dangerous intersection for cyclists and pedestrians having witnessed many accidents over 30 plus years.

I or we seek the following recommendation or decision from Auckland Council:

Clear plans for how to manage us living at both properties while construction is taking place. Access to both properties with security for parking of our personal assets and clear foot/pathways to the front door step. Water, Power, Sewage, Internet and Wastewater access to both properties with no interruptions. Assistance for insurance on our properties as damages on the house will incur with current plans. Alternative foot traffic to not use our access to property as the walk way while construction taking place. Attached Table 39: Puhinui cycling facilities options we believe Option 2: Cyclist bypass the interchange via a separate ramp structure to the BRT ramp structure is the

safest option for cyclists. Attached: as marked in yellow on the plan, why is this not an alternative route.

Submission date: 10 April 2023

Supporting documents

Alternatives-Volume 2-Appendix A-Version 1.pdf

Option 2.pdf

Marked in Yellow-an alternative route.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



**TE TUPU NGĀTAHI**  
SUPPORTING GROWTH

VOLUME 2 – APPENDIX A

# Airport to Botany Assessment of Alternatives

December 2022

Version 1

## Walking and cycling

Quality walking and cycling was confirmed as a part of the Airport to Botany corridor in the initial station generation across all segments. Alignment options that traversed the local road network from Botany Town Centre to the SH20/20B Interchange will include walking and cycling facilities on both sides of the BRT corridor.

### 10.1.1 Puhinui Station section

An exception to this is the pedestrian and cyclist bypass at Puhinui Station. This is because the BRT ramp structure which connects to Puhinui Station will be implemented with a 5% grade ramp for BRT vehicles, but pedestrians and cyclists require a desired longitudinal grade of 3%. In addition, creating a cycling facility along the BRT ramp means what cyclists must cross Puhinui Road to reach the base of the ramp, disrupting continuity of flow for cyclists. As a result, alternative routes for pedestrians and cyclists through the Puhinui Station area was investigated.

*Where is this page from?*

As pedestrians travelling the through route can use the Puhinui Interchange facilities to do so, the assessment primarily focused on facilities for cyclists. Four options were assessed:

Table 39: Puhinui cycling facilities options

Option	Description
Option 1	Cyclists use separated cycle facilities along the existing Kenderdine Road, Bridge Street and Cambridge Terrace Roads to bypass the Interchange
Option 2	Cyclists bypass the Interchange via a separate ramp structure to the BRT ramp structure
Option 3	Cyclists bypass the interchange by running a cycleway on the BRT ramp structure
Option 4	Cyclists utilise the facilities at Puhinui Station. this will require cyclists getting off their bike to use lifts/ stairs

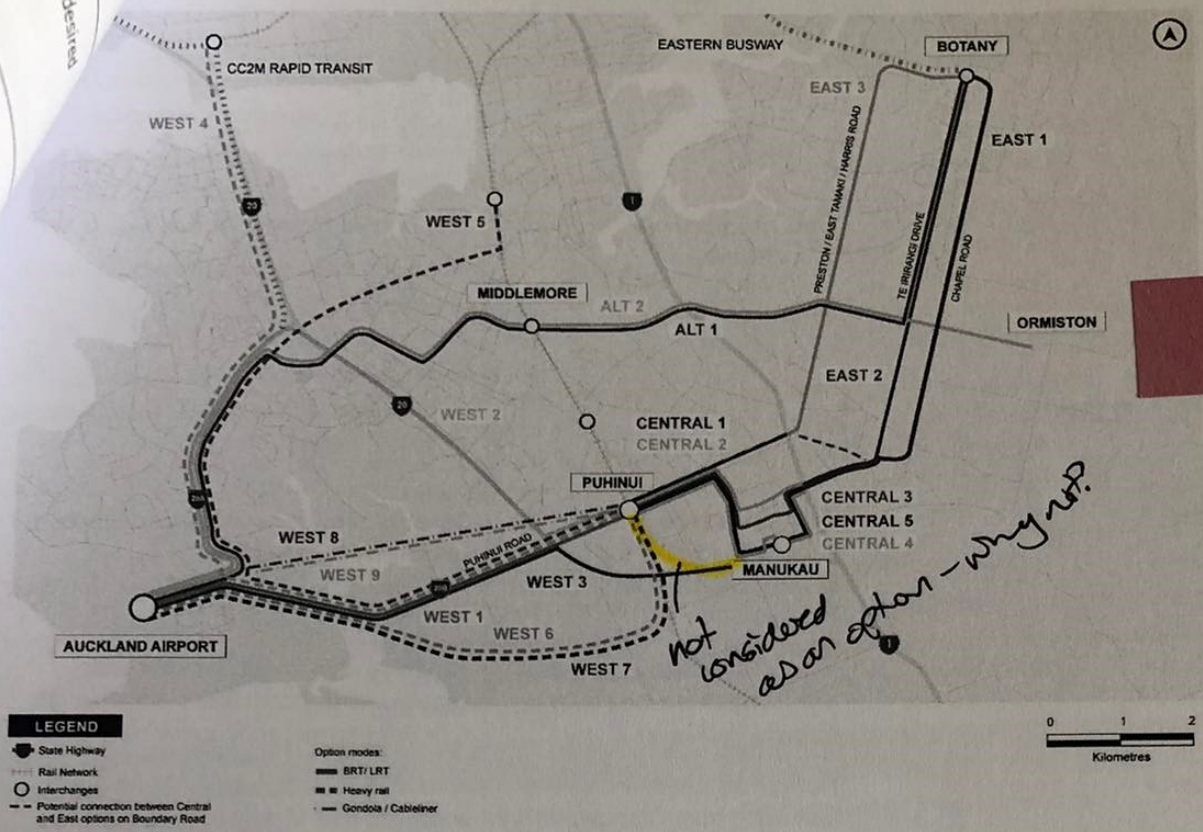


Figure 8: Initial options

Note: The locations of the options shown in Figure 8 above are indicative only to provide a visual depiction of all initial options as described in Table 6 below.

These options were then taken through a high-level sieving process to form the long list options to be progressed to the assessment. The sieving process used a seven-point scale (-3 to 3) with the following assessment criteria:

- Potential to provide benefits established during Investment Logic Mapping
- Potential to provide the required capacity
- Major environmental risks
- Cost impacts and feasibility of delivery

Table 6 below sets out descriptions of each initial option and the reasons for exclusion or inclusion from the long list assessment.

Table 6: Summary of all initial options developed (options progressed to long list assessment shown in bold)

Name	Mode	Description	Reason for exclusion / inclusion from long list
<b>West: Airport to Puhinui</b>			
<b>West 1</b>	<b>BRT or LRT</b>	<b>Puhinui Road from Puhinui Station to Airport</b>	<b>Progressed to long list due to:</b> <ul style="list-style-type: none"> <li>• Direct connection between Airport and Puhinui</li> <li>• Moderate cost</li> </ul>

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:447] Notice of Requirement online submission - Pam Butler Senior RMA Adviser  
**Date:** Monday, 10 April 2023 6:45:46 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Pam Butler Senior RMA Adviser

Organisation name: KiwiRail Holdings Limited

Full name of your agent: NA

Email address: Pam.butler@kiwirail.co.nz

Contact phone number: 0275708571

Postal address:  
Private Bag 92138  
Victoria Street West  
Auckland 1142  
Auckland City  
Auckland 1142

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:  
Whole NoR

Do you support or oppose the Notice of Requirement? I or we support the Notice of Requirement.

The reason for my or our views are:

Notice of Requirement (NoR 3) lodged by Auckland Transport (AT) for a new designation for the construction, operation and maintenance of an upgrade to Puhinui Road between Plunket Avenue and the SH20/20B Interchange to provide for a BRT corridor, walking and cycling facilities and associated infrastructure to which also crosses the North Island Main Trunk Line (NIMT) for which KiwiRail Holdings Limited (KiwiRail) is responsible. The area that is of the most interest to KiwiRail is where the proposed improvement works intersects with the rail corridor. KiwiRail supports in principle the designation of the new public transport route to facilitate improvements to access and supporting public transport usage and better integration with major transport networks and hubs as outlined in the application dated 09 December 2022 and accompanying application reports. KiwiRail notes that some of the area within the designation as sought by AT is already designated by KiwiRail and therefore as the Requiring Authority for the earlier designation, approval under s177 of the RMA is required for AT to undertake works within that corridor as part of the proposal. This submission does not constitute the required s177 approval, however we acknowledge the need for this approval is identified in the AEE. KiwiRail further acknowledge that the NoR AEE identifies that further engagement with KiwiRail through the detailed design will occur, and this is supported. Condition 3 as offered requires that the designation boundaries are to be reviewed following construction, and this is supported by KiwiRail. KiwiRail also supports Condition 27 which requires the preparation of a Network Utility Management Plan (NUMP). Condition 6 provides for the activities of network utility operators – a status also held by KiwiRail Holdings Limited. KiwiRail seeks the deletion of the word 'urgent' from Condition 6(a)(i). Specific areas that are of greatest interest to KiwiRail and around which the detail will need to be resolved prior to signing any s177 approval, include: 1. Ongoing engagement with KiwiRail through the detailed design process to

ensure; a) That KiwiRail's strategy for growing the capacity of the NIMT through the provision of additional tracks is acknowledged and accommodated in the design of the physical works for NoR3 and b) All safety and operational concerns arising from structures over and adjacent to the rail corridor are mitigated, including but not limited to ongoing effects on corridor stability 2. Detailed matters intended to be covered in the Network Utility Management Plan (NUMP)

I or we seek the following recommendation or decision from Auckland Council:  
KiwiRail supports the application and seeks that the Notice of Requirement be recommended for approval by Auckland Council subject to the conditions that have an influence on rail as outlined in this submission, including 3, 27 and 6 (as sought to be amended) being imposed.

Submission date: 10 April 2023

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:454] Notice of Requirement online submission - Avisha Mohanlal  
**Date:** Monday, 10 April 2023 11:15:38 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Avisha Mohanlal  
Organisation name:  
Full name of your agent: Avisha Mohanlal  
Email address: [avisha.mohanlal@gmail.com](mailto:avisha.mohanlal@gmail.com)  
Contact phone number: 098276146  
Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### **Submission details**

Name of requiring authority: Auckland Transport  
The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)  
The specific provisions that my submission relates to are:  
Widening of Puhinui road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:  
Widening of the road means a loss of land from my property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has a lot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:  
I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend for AT to have a look at other options with the current road system. This could be making roads one-way, increase the number of traffic signals for better flow of vehicle. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 10 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:457] Notice of Requirement online submission - Minakshi Mohanlal  
**Date:** Monday, 10 April 2023 11:15:43 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Minakshi Mohanlal

Organisation name:

Full name of your agent: Avisha Mohanlal

Email address: minakshi.mohanlal@gmail.com

Contact phone number: 098276146

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the road means a loss of land from my property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has a lot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend AT to have a look at other options with the current road system. This could be making roads one-way, increasing the number of traffic signals for better flow of vehicles. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 10 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:459] Notice of Requirement online submission - Faeaz Anwar Ali  
**Date:** Tuesday, 11 April 2023 1:30:39 am

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Faeaz Anwar Ali

Organisation name: Anwar Ali Family Trust

Full name of your agent:

Email address: faeaz@360consulting.nz

Contact phone number:

Postal address:

5 Bridge St

Papatoetoe

Manukau 2025

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

We have been living on this property for last 25yrs. Housing shortage in Auckland property market.

I or we seek the following recommendation or decision from Auckland Council:

We haven't had any decision from Auckland Council on this matter. Only when we came back found a mail saying your land is affected by this project and we would do land take over.

Submission date: 11 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:460] Notice of Requirement online submission - Faeaz Anwar Ali  
**Date:** Tuesday, 11 April 2023 1:45:38 am

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Faeaz Anwar Ali

Organisation name: Anwar Ali Family Trust

Full name of your agent:

Email address: faeaz@360consulting.nz

Contact phone number: 0226947656

Postal address:

5 Bridge St

Papatoetoe

Manukau 2025

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

We have been living on this property for last 25yrs. Shortage in Auckland property market. We won't able to find another property so close to public transport and its our family home. This property has lot of sentimental value.

I or we seek the following recommendation or decision from Auckland Council:

We haven't consulted Auckland Council on this matter. We only received a letter in our mail saying your property is affected by this project and we will do a land take over. Not adequate community consultation.

Submission date: 11 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of

requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:468] Notice of Requirement online submission - Alex Herkes  
**Date:** Tuesday, 11 April 2023 3:00:11 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Alex Herkes

Organisation name:

Full name of your agent:

Email address: alexherkes@gmail.com

Contact phone number:

Postal address:  
10 Noel Burnside Road  
Wiri  
Auckland 2025

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

My property is on the outside boarder of designation area as per your designation map

I or we seek the following recommendation or decision from Auckland Council:

Separate resource consents on boundaries rather than nor if property not fully included in designated land

Submission date: 11 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Miss Anahera Edmonds

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

19 Freyberg AVE, Puhinui, Papatoetoe

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

<b>By::</b> Name of Requiring Authority	Auckland Transport
<b>For:</b> A new designation or alteration to an existing designation	Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

### The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

### My submission is:

- I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
 I or we are neutral to the Notice of Requirement

### The reasons for my views are:

The NZ Dream of a Young Maori Man From Northland who met & married his wife from Auckland & raised his family of 6 Children in the heart of Sth Akl (Puhinui) Papatoetoe. We are proud of our Parents achievements who are one of the few original Maori families of Puhinui, who built their home in the 1970's over 53 years ago. They worked hard providing for their family & now retired, are reaping the rewards of enjoying life. A Minister of the Ratana Church in Otara, we have watched our Parents be involved within the

community of our Church from Prayer, to Christenings, Tangi & other Cultural events or simply for the love of the people. This home is filled with many mokopuna, & family. It holds many memories for us all, Its our foundation for our future generations encouraging Education, Health & Sports Achievements, attaining Levels of Merits in Te Reo Maori, and the list is endless. On behalf of Niki William Edmonds & Maringi Rangī Edmonds our Parents we as a Whanau oppose the Notice of Requirement for NoR3: Bus Rapid Transit - Puhinui Station(In the vicinity of Plunket Avenue,)to SH20/20B Interchange(Akl Transport).

#25

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Anahera Edmonds  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

04/11/2023  
Date

**Notes to person making submission:**  
If you are making a submission to the Environmental Protection Authority, you should use Form 16B.  
  
You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)  
  
If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:  
  
(a) Adversely affects the environment, and  
  
(b) Does not relate to trade competition or the effects of trade competition.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:472] Notice of Requirement online submission - Anahera Edmonds  
**Date:** Tuesday, 11 April 2023 5:15:14 pm

---

The following customer has submitted a Notice of Requirement online submission.

### Contact details

Full name of submitter: Anahera Edmonds

Organisation name: Niki William Edmonds and Maringi Rangi Edmonds

Full name of your agent:

Email address: [anaherae@pbt.co.nz](mailto:anaherae@pbt.co.nz)

Contact phone number:

Postal address:  
19 Freyberg Ave,  
Puhinui  
Papatoetoe  
2104

### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Between Puhinui and Plunket Ave And east of SH20/SH20B interchange to provide a bus rapid transit corridor and walking and cycling facility

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

we like the suburb as it is, is really busy as well and will be very busy going forward. we support the new roads, and cycling, and walkway but we do not want to sell our house. we have no interest in selling our house.

I or we seek the following recommendation or decision from Auckland Council:

Just to be update with any change of plans

Submission date: 11 April 2023

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority	Auckland Transport
For: A new designation or alteration to an existing designation	Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

My submission is:

- I or we support of the Notice of Requirement
- I or we are neutral to the Notice of Requirement
- I or we oppose to the Notice of Requirement

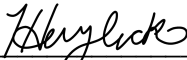
The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

Empty lines for providing details of the recommendation or decision.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
 \_\_\_\_\_  
 Signature of Submitter  
 (or person authorised to sign on behalf of submitter)

\_\_\_\_\_  
 Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

## Buffer Properties

### Land in the block Puhinui-Ranfurly-Cavendish-Clendon (PRCC) NoR3

plus

**All properties adjoining land where properties are to be acquired and demolished for the BRT elsewhere along the length of the route (NoR 1, 2 and 3)**

#### Specific Parts of Designation:

NoR1, NoR2, NoR3

Concerns about the project's effect on the long-term livability and use of the block of land currently zoned primarily residential, bound by Puhinui Road, Ranfurly Road, Cavendish Drive and Clendon Ave. (NoR3)

Concerns for homeowners of properties currently sited behind 'buffer properties' to be removed as part of the BRT project. Noise, visual intrusion that those land owners did not know about when purchasing their properties, and the fact they have not been specifically targeted by AT or SG engagement (or notified of the NoRs) even though they will be significantly impacted by the project if it goes ahead. (NoR 2,3)

#### Reasons for Submission:

The NoR documentation notes that the land bound by Puhinui Road, Ranfurly Road, Cavendish Drive and Clendon Ave is a bit of an anomaly. It is bound to the East by significant amounts of commercial zoned land and to the West by the NIMT. To the South is more commercial zoned land. To the North is currently residential, though if the proposed BRT infrastructure is built, the block will be severed from its Northern residential zoned neighbours. If the BRT bridge is constructed, the land bound by Puhinui-Ranfurly-Cavendish-Clendon will become an island (referred to as PRCC Island in this submission).

#### Noise Effects

The land is currently subject to strict planning conditions as a result of the HANA (High Airport Noise Environment) overlay in the District Plan. This results in two things – the land is zoned 'Single House', meaning only one residence is allowed per site, and the site size is 500m<sup>2</sup>. This is to limit the number of homes that are subject to high levels of aircraft noise. It also means that any new homes or additions, etc., are subject to higher than standard acoustic treatment requirements.

The Airport offers a noise mitigation package to existing homes in the HANA, to fit air conditioning and ventilation equipment so that homes are adequately ventilated with all doors and windows shut to keep out the aircraft noise. Note the packages do not include

double-glazing. The package is offered to homeowners 100% paid for by the Airport. A covenant is placed on the homes. There has been limited uptake of the package, meaning that many homes in the area are subject to significant aircraft noise. At our house (172 Puhinui Road), we are currently in the process of having the mitigation package installed. With the windows open, or when sitting outside, we regularly have to institute what we call the ‘Puhinui Pause’ as we cannot hear what each other is saying. This, along with the noise from existing traffic on Puhinui Road, led us to install double glazing at our own cost. It has made a significant difference to our quality of life.

While we bought our property on Puhinui road over 25 years ago, knowing there would be noise from both the airport activities and us being located right on a busy road, people owning homes to the South of us (Freyberg Ave) did not buy their houses on a busy road with traffic noise. The homes on Puhinui Road currently provide a buffer to the homes on Freyberg Ave.

If the BRT bridge is built, the majority of homes facing Puhinui Road in this block will be demolished. This will leave people in Freyberg Ave homes experiencing significantly more noise than they expected when they bought their properties. This is acknowledged in the Assessment of Traffic Noise Effects – the ATNE (p.x, 40). In addition, they will have the impacts of shading and visual disruption of a large bridge at the bottom of their back yards, instead of the suburban residential housing that was there when they bought.

The ATNE (p.45) notes that along Puhinui Road, the noise levels can be up to 72dB/24hr, while at the properties that are currently shielded by those Puhinui Road houses, the noise levels are less than 50dB/24hr. The ATNE appendices note expected changes in noise level. For properties in Freyberg Ave, many properties will go from experiencing noise in the 40db/24 range up to 60db/24hr (pp 101-102). This is a *significant* change.

Although these people are not directly affected by the proposed designation in terms of property acquisition in whole or in part, they are going to be directly affected by the construction and operation of the BRT (including the bridge) if it goes ahead. These property owners have not been sent individual letters informing them about the proposed designation, nor have they been invited to make submissions to it. This seems like a poor level of professional planning practice. It has led to anxiety and upset, along with anger that people who will be impacted by the BRT route have not been informed nor invited to be part of the engagement process.

Table 25 of the ATNE shows the number of people potentially ‘highly annoyed’ by the noise from the activities on Puhinui Road.

Scenario	Number of people highly annoyed
Existing	133
Do-nothing	141
Do-minimum	149

This table suggests that there will only be an increase of highly annoyed people from 133 to 149 (an increase of just 16 people). However, the table is misleading. It neglects to note that most, if not all of the current 133 highly annoyed people will not be living there anymore as their houses will have been demolished. Most of the 149 under a 'do minimum' approach will be newly 'highly annoyed' people living in houses on Freyberg etc., that were previously buffered from the noise of Puhinui Road by a row of houses that will not be there any longer. This needs to be considered – it is not just a small increase of high annoyance.

The ATNE (p.x and elsewhere) notes the properties in PRCC Island should not be overly affected by noise from the proposed BRT as they should already have some acoustic protection afforded them from the HANA noise mitigation package (e.g., p. 45). As noted above, however, uptake of the package has been low in part, because people are concerned about the covenants that give the Airport some say in what people do with their buildings. Also noted above, the HANA only goes so far. It does not, for example, provide extra-thick noise reducing gib-board or double glazing.

P.49 notes the only mitigation method that is recommended, is to ensure the roading surface of the BRT is similarly smooth to the current surface of Puhinui Road. I would like to see this revisited, with some form of compensation given to those property owners such as those on Freyberg Ave, who will experience both unanticipated acoustic and visual impacts. They did not buy their homes in the knowledge that they would, one day, be left with a large bridge overlooking their properties causing visual intrusion and acoustic angst.

There are some properties that will experience even great impacts. These are addresses on Puhinui Road where the properties have been subdivided in the past, and new homes built on the rear properties that have been created. The NoR maps show clearly that these homes will not be considered by AT to be acquired for the project. These homes, many of them double-storeyed, will face directly onto the new BRT bridge. These homeowners, like the other people that back onto properties to be acquired on Puhinui Road, have not been specifically notified about the proposed designation.

Along the small section of Puhinui Road between Clendon Ave and Plunket Ave, there are at least seven such properties. There are approximately 23 properties in this section of the street that are to be acquired. Numbers 176a, 186a, 188a, 190a, 200a and 200 Puhinui Road, and 4 Clendon Ave. This means that around 1/3 homes are not being acquired, but will experience considerable impact from the BRT as they will be sited so close to it. (Note, too, the anomaly where it seems 160 Puhinui Road only has a small road frontage taken, compared with its neighbours which have their entire property taken.)

I imagine that there will be many such properties along the entire length of the proposed BRT as planned in NoR 2 also, where the BRT alignment moves to the Northern side of Puhinui Road to avoid Puhinui School.

#### Uncertain future zoning



Some maps in the NoR documentation show the PRCC Island zoned in a colour that is not shown in the legend.

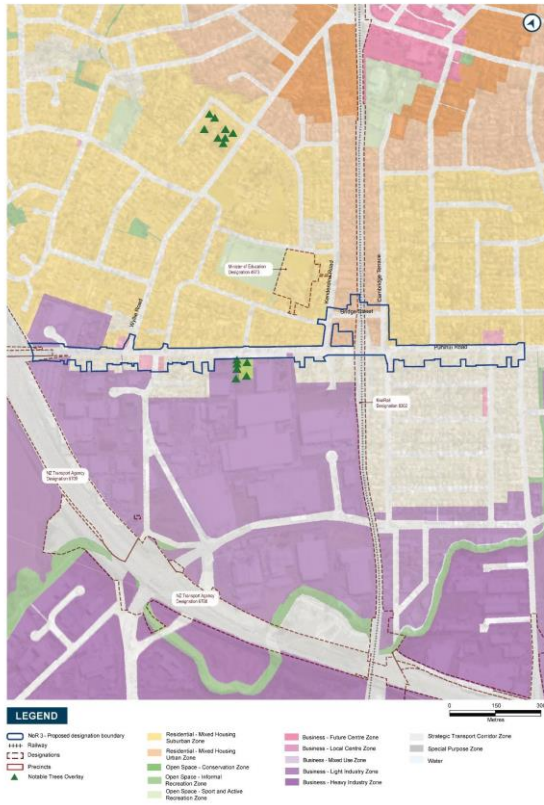
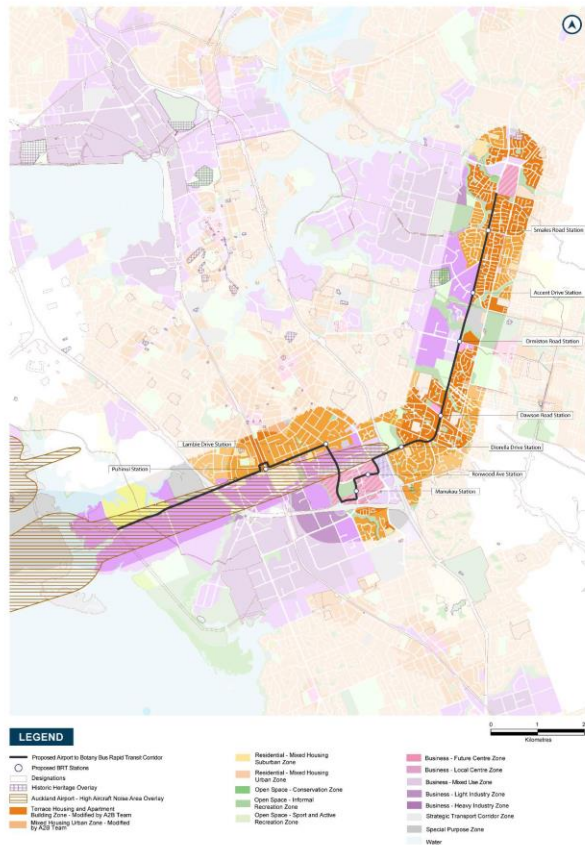
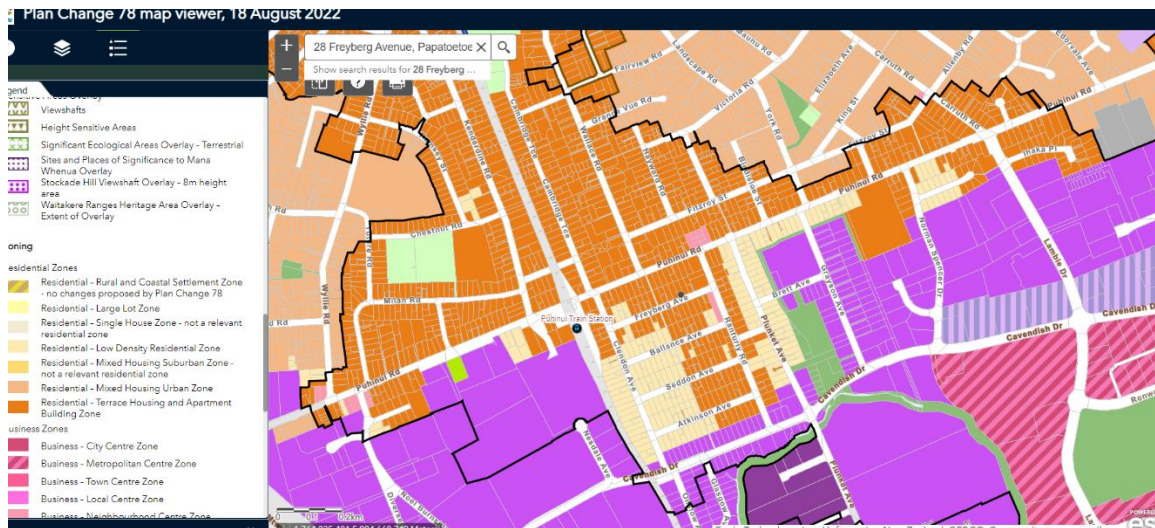


Figure 13, AEE. PRCC Island not zoned as anything?



AEE Figure 15: Application of the NPS:UD in the context of the Project (Plan Change 78 zoning forms the base map)

Noting this map was based on Plan Change 78, I looked up that plan change. Under that change, the PRCC Island land would be zoned as follows:



This further confuses the issue, given the impact of the airport HANA and MANA overlays.

This all leads to uncertainty – what is the future zoning of the land to be? I would like this to be clarified. Although the proposed BRT designation does not seek to alter the zoning, these maps have caused a degree of community upset and uncertainty. Some people in the PRCC

Island who are not directly affected by the proposed designation in terms of land acquisition, are wondering what the future of their own homes will be.

### Residential re-development on Puhinui?

Something that concerns me on the map in Figure 15 is that it shows the land not used for the construction of the BRT on the Southern side of Puhinui Road, zoned for 'Mixed House Urban Zone – Modified by A2B Team'. Does this mean that any left-over land will be zoned for some sort of intensive residential use?

This concerns me for a couple of reasons.

First, the land could be redeveloped as open space as a ribbon park adjacent to the length of the road, linked in with the proposed walking and cycling paths. This would 'give back' to a community that has paid a high price for the connectivity of people living and working at Botany and the Airport.

Second, though I know the philosophy of developing high intensity residential land use near rapid transit stations is embedded in AC's and central government's plans, do we really, truly, want to rely on either the HANA or MANA Airport noise mitigation packages, or 'responsible developers' (ATNE p.x) to ensure the people living in such high density residential buildings are adequately protected from the noise, vibration and visual overlooking of a BRT bridge? If the land is zoned Mixed Use Urban Zone, and if this means people will be living in homes built on land left-over from the construction of the BRT, there need to be strict building *requirements* on developers, that are resolutely enforced by AC.

### A Commercial Future?

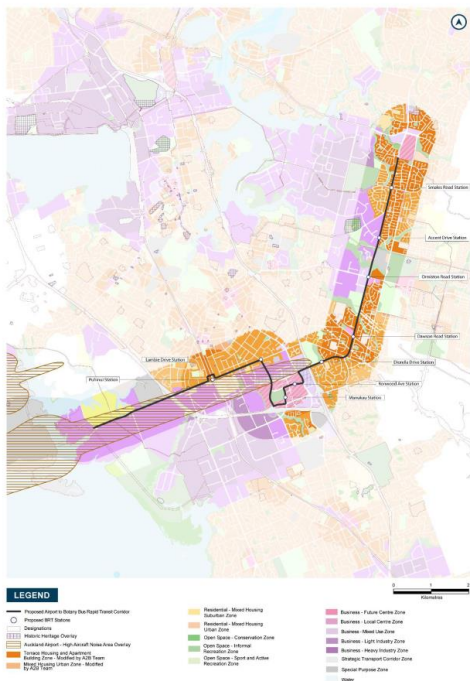
The SIA (p.50) notes that, “Those residential properties directly behind properties fronting Puhinui Road are likely to, over time, redevelop as commercial use being wholly impacted by the HANA.” This came as a surprise when I read it. Does this mean that the PRCC Island is actually planned future commercial? In some ways this makes sense, given that the proposed BRT effectively severs the PRCC Island from the rest of its Papatoetoe community. But, once again, if this is in the future plan, surely those homeowners should be given some idea of this in a manner that is clearer and more focused than being buried in a document amongst many other documents on a website?

### Land similarly affected by removal of ‘buffer properties’

This submission, while it focusses on the PRCC Island land, is also relevant for any other properties along the entire length of the project, particularly elsewhere in NoR3 and NoR2. Properties in other sections of the project that lose their buffer when houses between them and the BRT route, will experience similar noise and visual impacts to those detailed above for the PRCC Island properties.

These land owners, too, have not been specifically identified and notified of the project or the proposed designation. They, too, should be better informed by the official organisations involved, and be eligible for compensation should the project go ahead – not merely appeased by low-noise road surfacing or limited use of buffer fencing.

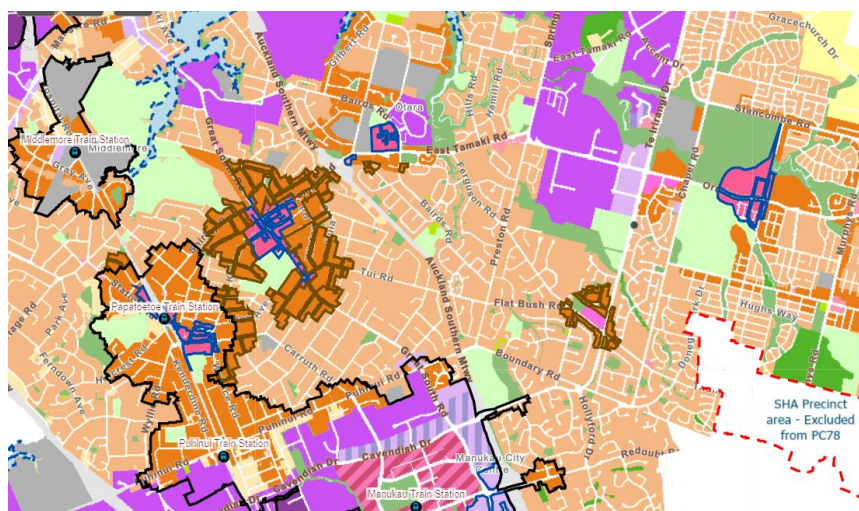
### Te Iirangi Drive future rezoning



AEE Figure 15: Application of the NPS:UD in the context of the Project (Plan Change 78 zoning forms the base map)

Figure 15 in the AEE (above) notes that there is planned to be the bright orange ‘Terrace Housing and Apartment Building Zone (modified by A2B team)’ along much of Te Irirangi Drive. This map is, ostensibly, based on the Plan change 78 map. However, when looking at that map (screenshot below), it shows less intensive residential development along the length of Te Irirangi Drive.

This seems like a ‘build it and they will come’ philosophy, while not taking into proper account the impacts of either the BRT route or the intensified housing on the surrounding area. There is no guarantee that more intensive development will occur along this corridor or if, indeed, more intensive development zoning will be effected in the District Plan as it is currently subject to Plan Change 78. The zoning in Plan Change 78 is less intense than that proposed in Fig 15 as ‘modified by the A2B team’. Will there be another plan change from the A2B team that further intensifies future potential development over and above what is being requested by the NPS:UD?



- Zoning
- Residential Zones
- Residential - Rural and Coastal Settlement Zone - no changes proposed by Plan Change 78
  - Residential - Large Lot Zone
  - Residential - Single House Zone - not a relevant residential zone
  - Residential - Low Density Residential Zone
  - Residential - Mixed Housing Suburban Zone - not a relevant residential zone
  - Residential - Mixed Housing Urban Zone
  - Residential - Terrace Housing and Apartment Building Zone

Screenshot of Puhinui Road-Te Irirangi Drive area from Plan Change 78 maps site

**Seek recommendations:**

- AT to compensate residents of properties along the entire length of the BRT route that lose the buffer of houses currently sited between the affected properties and the proposed BRT infrastructure. Compensation to mitigate visual and noise impacts.
- AT/AC to clarify future zoning plans for the PRCC Island. Different parts of the NoR documentation suggest no zoning/intensified residential/commercial

- AT to re-design 'left over' land along the route that is designated but not used for the actual BRT or active mode infrastructure so it is used as a 'ribbon park' (see my other submission on this topic). AC to rezone left over land accordingly as Open Space.
- AT/AC to clarify future zoning plans for the rest of the proposed BRT route (e.g., Te Irirangi Drive) Different parts of the NoR documentation suggest uncertain plans for degree of intensification, not yet mandated in the district plan.

## Construction Effects

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs for construction of BRT project. Some of the construction effects (e.g., noise, dust and vibration) will be significant. Not all mitigation measures mentioned in the documentation are sufficient.

### Reasons for Submission:

The NoR documentation notes that once detailed design has occurred, the construction phases of the project will vary between 3-6 years.

Some of the construction effects (e.g., noise, dust and vibration) will be significant. Three to six years is a *long* time. Some of the effects of road construction and maintenance along Puhinui Road (e.g., the Watercare Hunua water main, the construction of existing bus lanes) resulted in significant disruption. It became unpleasant to live in the area. But we always knew the time period would be relatively short. In neither case did it take *years*.

The Assessment of Environmental Effects (p.93) notes the noise of construction will be temporary. But temporary does not mean short.

Some of the noise effects are *significant*. Loud noise, significant vibration, etc.

There seem to be some mitigation measures in place, particularly for sensitive activities. There is the opportunity for short-term respite and relocation in certain circumstances. Reading the conditions for such relocation, suggests to me that it is going to be quite a difficult process to prove the need for such measures. Once again, our community is neither a highly literate nor litigious one. There are social, educational and economic barriers to effective involvement and self-advocacy.

I would like to see AT providing one-on-one assistance for applying for such mitigation measures (similar to the Friends of the Submitter programme, but locally based).

I would also like to see AT providing other support – for example, if a family needs to temporarily relocate due to the effects of construction, they should not be materially disadvantaged by things like the cost of taking their children to school from where they are staying outside the affected area.

Another example of AT providing other support could be temporary relocation to vacant office space where people work from home and their work days are disrupted by the effects of noise and vibration.

I would also appreciate AT, at the design stage of the project, carefully re-assessing the potential effects of noise, vibration, etc., and monitoring them during construction. I would

like to see more effort put into looking at alternatives to mitigate the effects, such as technology advances, rather than just looking at means such as limiting the operational time windows when active construction is taking place.

Once again, this is a high-needs community that is not used to interacting with big, powerful organisations such as AC and AT. I reflect on how differently a community such as Remuera might respond to such a transport proposal, with significant construction effects on properties for up to six years.

Our community is strong, but it is not immune to the effects of stress. I would hate to see issues such as domestic violence, anxiety and depression rates increasing in an already vulnerable area as a result of a transport project which will give that community negligible positive benefits in the future. Indeed, it is likely to be left with ongoing negative impacts (e.g., noise, dust, visual) even once the BRT is operational.

#### **Seek recommendations:**

- I would like to see AT providing one-on-one assistance for applying for mitigation measures such as relocation opportunities (similar to the Friends of the Submitter programme, but locally based).
- I would also like to see AT providing other, associated financial support – for example, if a family needs to temporarily relocate due to the effects of construction, they should not be materially disadvantaged by things like the cost of taking their children to school from where they are staying outside the affected area.
- I would like AT to provide support to those residents who work from home and are impacted by construction noise (e.g., temporary hire of vacant office spaces away from the affected area).
- I would also appreciate AT, at the design stage of the project, carefully re-assessing the potential effects of noise, vibration, etc., and monitoring them during construction. I would like to see more effort put into looking at other alternatives to mitigate the effects, such as technology advances, rather than just looking at means such as limiting the operational time windows when active construction is taking place.



## Effects on local roading network

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on local roads near the BRT route

### Reasons for Submission:

#### Traffic on streets surrounding the BRT route

The documentation for the BRT notes that there will be traffic impacts on surrounding streets that are in close proximity to Puhinui Road and other roadways along the length of the BRT. People will attempt to avoid the congestion caused by construction of the BRT on the main route, by driving in surrounding streets. The residents of these streets will not be accustomed to these volumes of traffic. AT needs to consider how to best manage this through road management practices on those roads, and mitigation of vehicle noise for residents of these streets.

In addition, as residents along the BRT will now only be able to turn left out of their driveways, they will have to drive on these surrounding streets to get to their destinations. The NoR documentation notes in a number of places, that having to turn left out of a driveway and go around the block to get to a destination will add approximately 2.5km to each journey. Assuming people would then return to their homes afterwards, this would add approximately 5km to each trip away from home. When considering this, and adding it all up, an effect of this aspect of the BRT proposal will be more vehicle kilometres travelled and, therefore, more pollution emitted from vehicles. It will also cost residents more over time in fuel and vehicle maintenance.

In order to mitigate these effects, AT should look at compensating for the extra cost to residents with financial compensation. It should also look at how it can mitigate the effect of the increased pollution that will be caused – for example, by using the left-over land that is acquired for the designation, as a ribbon park with plentiful tree planting to offset the increased emission of greenhouse gases caused as a result of the need for people to add 5km of vehicle use per return journey from their homes.

#### Noel Burnside Ave

I note that the current entrance to SH20 at the intersection of Puhinui Road and the state highway will be closed. The NoR documentation notes this will put added traffic onto Noel Burnside Ave. This is already an extremely busy street. The recent changes to the configuration of lanes in the vicinity of the Noel Burnside/Puhinui/Wyllie Road intersections have led to significant traffic delays as vehicles navigate a short length of Puhinui Road to get from Noel Burnside to Wyllie and vice-versa. This will only be exacerbated with Noel Burnside Ave becoming busier as the main way for cars to get to SH20 from the surrounding area.

This aspect of the roading design needs some detailed consideration and a re-look at the potential impacts and practicality of putting Noel Burnside Ave in this position as a major through-link.

#### Pedestrian linkages across BRT

Various maps in the NoR documentation show arrows where it is expected that there will be pedestrian access across the BRT (e.g., near Puhinui School, and the Puhinui Road shops at the end of Ranfurly Road). In the Assessment of Traffic Effects (p.91) 'cross walks' are mentioned. Elsewhere in the NoR documents, 'at grade' crossings are mentioned (i.e., underpasses or bridges).

I imagine that cross-walks will not help to achieve the rapid transit of buses if signalised pedestrian crossings are put in place. Underpasses are probably not ideal (both in terms of safety and the fact that Puhinui Road has a number of major services tunneled underground along its length, such as gas and water). Bridges for pedestrians will require the acquisition of more land than has been shown in the documentation. For example, near the Puhinui Road shops, if a pedestrian bridge is built at the location shown on the map, it would necessitate the removal of some of the shops to allow for a ramp or stairs to access such a bridge.

In the detailed design phase of the project, AT should work with the community to identify the best ways and locations to provide pedestrian linkages across the BRT route.

#### **Seek recommendations:**

- That AT put appropriate traffic management practices in place in surrounding streets to avoid them becoming 'rat races' due to construction of the BRT, and consider how best to mitigate the effects of increased traffic noise on residents of these streets
- That AT provide compensation to land-owners who will only be able to turn left out of their driveways along Puhinui Road as a result of the BRT route.
- That AT mitigate the effect of increased vehicle use by residents who have to drive around the block to overcome the fact they can only turn left out of their driveways, by planting trees. Ideally in a ribbon park created using left-over land acquired but not used for the purpose of the designation.
- That AT further consider and report back on the ongoing operational role of Noel Burnside Ave once the link from Puhinui Road to SH20 is removed.
- That AT assess and report in more detail on the proposed linkages for pedestrians across the BRT

## Engagement

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Engagement with affected land owners in the lead-up to the lodgment of the NoRs has been poor.

Notification about the NoRs to affected and impacted land owners has been poor.

Communication during detailed design and construction phases needs to be done better than engagement carried out with residents to date.

### Reasons for Submission:

I realise that AT as the requiring authority didn't have to engage with the affected community prior to lodging the NoRs (S.36A RMA) but it is generally seen as good practice to do so. In my own experience as a planner at Auckland City Council (admittedly over twenty years ago now), it certainly makes it easier in the long run if you can bring a community along with you when planning a major planning or infrastructure project.

In the case of the Airport to Botany Rapid Transit project, AT and SG have made some attempts to engage. There are two weighty documents that outline their community engagement efforts (see Appendix A to this submission). However, when you dig down into the depths of these documents, to see what *actual* efforts were made to engage with the people likely to be *directly affected* by the route, the efforts were not satisfactory in my view.

I also realise that the engagement efforts of AT and SG will not 'make or break' the decision of whether the designations are approved. However, I'd like to think that what I say in this submission will be taken into account. It will definitely have had a major impact on the number of submissions received, and the understanding people have about the actual potential impacts of the project if constructed.

#### Engagement prior to lodging NoRs

Appendix A to this submission is my presentation to the Ōtara-Papatoetoe Local Board Meeting on 6 December 2022. It specifies the prior engagement that was carried out that specifically targeted people who might be directly impacted by the BRT designation.

Essentially, it boils down to:

- Unaddressed flyers dropped in letterboxes, delivered folded up in a bunch by the same people who drop off the unsolicited 'junk mail'
- Opportunities to talk to AT/SG staff at Manukau Westfield on two occasions and outside Papatoetoe New World on one occasion

- Letters addressed to residents in July 2022 which did not specify the scale or potential impact of the proposed route
- Letters to residents who are directly impacted by land acquisition either in whole or in part in August 2022 with an invitation to meet with SG staff
- Meetings with SG staff where owners of individual properties were told more about the potential impact on their land. For many, this was the first time they realised the extent of the impact to them personally. SG staff made it clear they could not give a map showing the entire route due to privacy reasons and that they could only talk to landowners about their own individual properties.

When we study the information sent to residents in the flyers, and even the information presented to local boards, the route shown was a generalised blue line along Puhinui Road, with absolutely no indication of the scale, including the plan to build a bridge to link with the Puhinui Train Station, and to realign the route to go through all the houses on the southern side of Puhinui Road from Clendon Ave on past Plunket. There was also no reference with the location of the blue line, to the impact on Kenderdine Road, Bridge Street and Cambridge Terrace. In addition, the only real route 'options' that people were asked to comment on in these flyers involved which streets within Manukau Central would have the BRT route. There were no clear opportunities that I can find information on where potentially impacted people were targeted to be invited to have *meaningful* input to which other routes (e.g., not using Puhinui Road at all) were being assessed.

We are also concerned that as the flyers were delivered, not in envelopes, and not individually addressed, they may well have gone un-noticed folded up in the 'junk mail' many of us put straight in the recycling bin.

When we drilled down into the type of consultation that occurred at the New World and Westfield Manukau information sessions, people were asked generalised questions designed to get standardised answers. They were offered the opportunity to write short comments and place them on maps with post-it notes. The route 'options' presented were few.

When we tried to get further information from SG staff about the other properties affected by the proposed route, we were continually rebuffed, with privacy issues cited. My husband and I went door-knocking up and down the street, trying not to look like we were selling vacuum cleaners, to see talk to other residents about the impact on their properties. We were floored to find that some people had not even received a letter, and thus were completely unaware of the project. (Including a property badly affected by the 2021 tornado – the old house was demolished and there is currently a brand-new two-storey home being built on the site at 182 Puhinui Road – you can imagine the shock and consternation of the land owner who was given consent to build on a property about to be affected by an acquisition under an NoR!)

It was not until late in the piece, after repeated requests from Arena Williams, our local MP, that AT/SG staff came to a meeting outside the Puhinui Train Station and unrolled a map so people could see the actual extent of the proposed NoR.

Digging into the engagement documents from AT/SG, I was surprised to see that residents associations in far-flung areas such as Wattle Downs, had been engaged with, but not the people likely to be directly affected by construction of the BRT route.

The SIA Appendix B, Summary of Engagement, mentions that there were interviews undertaken with stakeholders including private property owners. The document only notes conversations with one business owner from the shops adjacent to Ranfurly Road, and the opinion piece written for and published in the *NZ Herald* by Mr Ali Shakir who lives at the Botany end of the BRT corridor. The first section of the Summary notes that, "*Not all stakeholders were able to participate in the SIA or were able to complete the Social Impact Assessment Process.*" I would like to know how the particular stakeholders and groups were identified, and why, for the entirety of the route from the airport to Botany, only two 'private property owners' were interviewed.

The Summary goes on to say that "*We identified advocacy groups, social enterprises, and other groups representing community interests and business and community networks and contacted them.*" I would like to know if any were in the area most affected by property acquisition. The voluntary surveys carried out, and the meetings with groups noted in the Summary show *no* groups directly linked to the area most affected by property acquisition. The groups noted in the Summary were:

- *Chinese community in Botany Downs, Botany Junction, Flat Bush, Dannemora and Ormiston with a focus on older people and youth;*
- *The Fijian Indian community in Flat Bush, Ormiston, Clover Park and the Airport Precinct;*
- *The Pasifika community in Otara, Clover Park, Wiri, Flat Bush, Manukau City Centre and Ormiston, age groups 18-49; and*
- *Residents in the Flat Bush and Ormiston area.*

None of these groups are located or representative of people living in Papatoetoe, particularly Puhinui Road, or in the vicinity of land to be taken around Bridge Street. This does not seem like an SIA that was carried out with the intention of actually getting honest input from affected landowners.

Social Impact Assessment engagement interviews were carried out with the Puhinui Medical Centre and Puhinui School. These interviews were focussed very much on the impact of the project on business and access. Neither the school nor the medical centre are facing property acquisition. In addition, it is unclear *when* these conversations took place, and whether the true impact of expected housing intensification has been taken into account in discussions on, for example, expected roll growth in the future. In addition, were those at the school made fully aware of the extent of the BRT route and its infrastructure and the fact it will, essentially cut the school off geographically from most of its school community?

Near the end of the Summary of Engagement is a table (Table 2) which notes that approximately 85 of the 475 potentially affected landowners were met with. I would like to know how the 85 were contacted and met with. The only thing I can think of is that it is these land owners who responded to their letters of August 2022 inviting them to meet with

representatives of SG. These meetings were not true 'engagement' or part of a Social Impact Assessment – they were merely to inform land owners of what could be happening to their land, and of the designation process itself.

I am incensed at the low level of effective communication with land owners likely to be directly affected by the proposal. I try not to be squinty-eyed and cynical, but I'm sure a proposal as large as this would have been treated quite differently if it were to be planned in a more wealthy, educated area where people are more inclined to litigate.

That said, I once worked as a planner at Auckland City Council. If anyone here should have seen the extent of the proposal coming, it should have been me. But I didn't see it coming. The blue line on the flyers I took to mean some improvements to the bus lane that is already outside our house. Perhaps widening a metre or so to give a bit more space on the carriage way.

When we bought 172 Puhinui Road over 25 years ago, it had a road widening designation on it for a metre or so from the front of the property. This designation was lifted after the full construction of the Cavendish Drive through-route which was where most traffic, including freight vehicles, was expected to travel, leaving Puhinui Road more for local traffic. Since then, bus lanes have been created down Puhinui Road. They are a bit tight so you can imagine, then, when we saw the flyers with the blue line drawn on them, that we thought AT was re-considering minor road-widening such as was proposed when we first bought here, in order to give the bus lanes a little more space.

Even when we received our letter in August 2022 and made an appointment time to talk to SG representatives, I naively went along thinking, even though our whole property was cross-hatched on the map attached to the letter, that only a small sliver was likely to be needed to facilitate improved rapid bus transit via a widening of the bus lane. How wrong I was, and how shocked was I when, at the meeting, after sitting through the planners telling us about the need for improved public transport in the area, they said it was our *entire* property to be taken for the BRT route, and that there would be an enormous raised bridge going through where our house currently sits.

Going back to dissect those flyers, I still don't think even knowing what I know now, that the information that was contained in them gave a true and accurate reflection of the potential *scale* of the proposed BRT. The cynical part of me looks at the documentation and wonders if this was intentional all along.

I feel that I have failed my local community by not seeing this coming.

Page37 of the SIA notes that a reason for people in the area having poor knowledge of the project, is that as it has taken a long time to get to the notification of designations, many people have moved out of the area, and the newcomers don't know about the project. This may be the case, but I would also argue that most long-term residents have not known about the project either.



### Notification of NoRs

Now that we are at the stage of the NoRs being lodged and publically notified as open for submission, AT/AC have sent letters to directly affected land owners (those with properties to be acquired in full or in part if the designations go through).

Given that there are many others (especially in properties that adjoin those to be acquired, or on the other side of Puhinui Road from the properties to be acquired) who will also be massively impacted by the construction and operation of the BRT, I would like to know why these property owners did not also receive letters to notify them that submissions are open.

As mentioned in the SIA, this is a disadvantaged community with a high deprivation level. The formal method of notifying about the NoRs is not one that will readily see people who live here, getting involved and making submissions. Many are elderly. Many have English as a second language. Some have come from other countries as refugees. Some cannot read or write, certainly not to the level required to understand the NoR documents and respond to them. Many families here live pay-cheque to pay-cheque or rely on assistance from food banks to feed their kids. These people will not necessarily have access to the internet, devices, or printing. People who live here are not generally litigious.

I believe strongly that in areas such as this, there needs to be a better method of getting people involved in the process. Face-to-face meetings are needed, with more assistance than can be provided via Friends of the Submitter whose planning offices are based far away on the North Shore (many here I have spoken to are frightened to talk to the FoS as they see they are employed via AC and, therefore, may not be unbiased). I am unsure why a more locally based planning company was not used to provide FoS services to this community – where they could actually come out on the ground and meet with people who are not comfortable communicating via the phone, internet or the written word.

The statutory timeframe does not give people who are working full time much time to read, absorb and submit for a project of this scale, either.

I would not be at all surprised, if the designations go through and, eventually, construction begins, for some of our neighbourhood to be like Arthur Dent in *The Hitchhiker's Guide to the Galaxy* by Douglas Adams. Arthur came out of his house one morning in his dressing gown, to find the bulldozers ready to demolish his house (actually, the whole planet) to make way for a new hyperspace bypass. When he asked about what consultation had gone on for the project, he found that the documents had been available for viewing on another planet.

*"You hadn't exactly gone out of your way to call attention to them had you? I mean like actually telling anyone or anything."*

*"But the plans were on display . . ."*

*"On display? I eventually had to go down to the cellar to find them."*

*"That's the display department."*



*"With a flashlight."*

*"Ah, well, the lights had probably gone."*

*"So had the stairs."*

*"But look, you found the notice, didn't you?"*

*"Yes," said Arthur, "yes I did. It was on display in the bottom of a locked filing cabinet stuck in a disused lavatory with a sign on the door saying, 'Beware of the Leopard'."*

Please, Auckland Transport, Supporting Growth and Auckland Council, let's do better.

### Detailed Design and Construction Phases

The SIA outlines how, *"Ongoing engagement should continue during the planning stage of the Project to continue to maintain and build relationships with the community and provide an opportunity for those new to the area to find out about the project."* Given what I have written above, I don't think there are existing relationships to build on.

Indeed, page 52 of the SIA recommends that a Community and Stakeholder Engagement Strategy be developed for the project that includes, among other things, *"Maintaining the current good relationships between Auckland Transport and Waka Kotahi and the community, particularly directly affected landowners."* This is almost laughable given the poor engagement efforts that have been undertaken to date, despite the two impressive-looking engagement documents. I would challenge AT to find even one affected land owner who truly feels they have been effectively engaged with to date that the organization could say they have a 'current good relationship' with.

The SIA (p.52) suggests information about the project be available for the community, and in particular, affected land owners. The SIA suggests this be done via the AT website. For all the reasons noted above, such as low literacy, ESOL, etc., this is not going to be enough. There will need to be face-to-face meetings and get-togethers.

Please treat our community better than has been done to date with this project.

### **Seek recommendations:**

- That AT/AC communicate much more effectively with affected communities if the project goes ahead.
- That there be a more effective, locally-based 'Friends of the Submitter' type offer to assist people in the neighbourhood with the rest of the designation process (hearings, etc.)

- That not only land owners of properties to be acquired are communicated with, but other affected people too, such as those with properties adjacent to acquired properties
- That there be a dedicated team to work alongside the affected residents during detailed design and construction phases (face to face meetings, etc., not just information on a website).

**Appendix A to submission by Heather Haylock regarding  
Engagement for  
NoRs 1, 2, 3, 4a and 4b**

**Presentation to Ōtara-Papatoetoe Local Board Meeting**

**6 December 2022**

**Regarding Airport to Botany Rapid Transit Route**

## **Presentation to Ōtara-Papatoetoe Local Board Meeting**

**6 December 2022**

### **Regarding Airport to Botany Rapid Transit Route**

**by Heather Haylock**

I am speaking as one of a number of people who live and work along Puhinui Road, as well as others in Bridge Street, Kenderdine Road and Cambridge Terrace and people in the surrounding area, who are to be massively impacted by the proposed Airport to Botany Rapid Transit Route. Mr Kamlesh Rana will also be speaking at the meeting.

#### **Letters**

In July and August 2022, residents of affected properties received letters from Te Tupu Ngātahi Supporting Growth Group/Auckland Transport, advising that the preferred route for the Airport to Botany Rapid Transit Project would impact their properties. The August letter invited individual land owners to make an appointment for an interview with representatives from Supporting Growth. The letter also included site maps for individual properties to show the land expected to be required for the project.

#### **Meetings**

At the meetings, landowners for separate properties were ushered into rooms with two representatives from Supporting Growth/AT. This meant that no landowners met with other landowners, and different pairs of representatives spoke to different landowners.

After being told more about the overall rapid transit project and how it fits into overall plans for public transport in Auckland, landowners were able to discuss the impact on their individual properties.

Many of us were shocked at the extent of the land required. In some cases, it is our whole properties. In others, there are significant slices of land taken from the fronts of properties – in some cases, this would mean the transport routes are within a metre or two of existing front doors.

We were shocked at the extent of the proposed project. In none of the community 'consultation' (see 'Background Consultation' section below) had this been made clear. We had been lulled into a false sense of security, and led to think that the impact on this section of Puhinui Road might be limited to some extension of the existing bus lanes.

The Supporting Growth/AT reps explained the designation process. The plan is for a requirement for designation to be applied for by AT in December 2022, with an opportunity

for people to make submissions and appear at Auckland Council hearings in 2023. If the designation is approved by Council, it will go onto the District Plan maps.

The representatives said there are no plans to purchase properties under the Public Works Act until the project is closer to construction. Different residents were told different things by the various representatives. Some were told properties might be able to be bought in five years time, but most were told that as the project is some 10-15 years away, it would be unlikely that an offer would be made for properties for at least ten years.

Different landowners were also given mixed messages about what the purchase of their properties would mean – what 'market rates' paid for the properties actually means in practice. Many landowners do not want to sell, and have concerns about the fact that their land may be taken anyway, whether or not they wish to sell to AT.

When asked for a map of the route to show the true extent of the project, and the route, and the actual properties affected, the representatives told us that was not possible as it would be a breach of privacy – that they could only talk to individuals about their own properties. This seemed disingenuous; as a result, we have gone door-knocking and made announcements in social media to try to get in contact with as many affected people as we can so we can put together our own map of the route.

When we went door-knocking, it came to light that some residents did not even receive their letters, so had no idea about what was going on. In one case, a resident is currently building a new home in place of the one that was destroyed in last year's tornado. It seems almost unbelievable that consent was given for that building to go ahead in the knowledge that in 10-15 years it will be demolished to make way for the rapid transit route.

## **The proposal**

Despite generalised maps sent out over the past couple of years (see 'Background Consultation' below), at no point was the true scale of the project made clear. It appears that the route comes from the airport, along Puhinui Road, and is then bridged up over the top of the train tracks to link with the top floor of the new Puhinui Train Station. The bridge continues on down past Plunket Ave before the route returns to ground level (apparently a long approach is required on either side of the bridge to get the gradient needed for rapid transit vehicles). Because of the placement of the Puhinui Station, slightly to the south of Puhinui Road, the bridge will go directly through all the properties affected. Scale of the bridge can be seen on the following video: <https://youtu.be/iSeQIR7gzZM>

Not only will it impact the landowners of those properties that will be taken, but it will also impact those neighbours abutting the bridge (e.g., in Freyburg Avenue), leaving them with a bridge at the bottom of their backyards. These people have not been consulted with at all.

There is planned to be another station at the intersection of Puhinui Road and Lambie Drive, before the route travels along Lambie to get to the Manukau Train Station. After that it winds its way back towards Te Irirangi Drive where it continues to Botany Town Centre.

In addition, the plan is to widen the sections of Kenderdine, Bridge Street and Cambridge Terrace to allow better traffic flow for local traffic and buses, and walking and cycling. Nowhere in the background consultation maps was this suggested at all, so the project has come as a massive blow from left-field for those land owners.

### **Background 'consultation'**

After the interview meeting with the Supporting Growth/AT representatives, we spent some time trying to work out how such a massive project had got to this stage of development without us knowing.

We found reference to two documents which outline the community participation programme. *Southwest Gateway Programme Engagement Summary December 2017 to December 2018*, and *Southwest Gateway Programme Engagement Summary January to December 2019*. ([see end of this report for location of downloadable documents](#))

In summary, it appears that residents along the route will have received some flyers in the mail over the past few years, and had the opportunity to go and look at some posters in places such as Papatoetoe New World one evening, and Westfield Manukau on two dates.

There were presentations made to a number of local boards, including the Ōtara-Papatoetoe Local Board on 17 September 2018. (Airport-Botany 20 Connect Southern Local Boards presentation) ([see end of this report for location of downloadable document](#))

When we study the information sent to residents in the flyers, and even the information presented to local boards, the route was a generalised blue line along Puhinui Road, with absolutely no indication of the scale, including the plan to build a bridge to link with the Puhinui Train Station, and to realign the route to go through all the houses on the southern side of Puhinui Road from Clendon Ave on past Plunket. There was also no reference to the impact on Kenderdine Road, Bridge Street and Cambridge Terrace.

We are also concerned that as the flyers were delivered, not in envelopes, and not individually addressed, they may well have gone un-noticed in the 'junk mail' many of us put straight in the recycling bin.

When we dug down into the type of consultation that occurred at the New World and Westfield Manukau information sessions, people were asked generalised questions designed to get standardised answers. They were offered the opportunity to write short comments and place them on maps with post-it notes.

The two Engagement Summary documents are very thick and impressive-looking, but when you actually read them, there is a lot of repetition. Much fluff and not much substance. We were fascinated to read that groups such as residents groups in Wattle Downs, Weymouth and Alfirston (to name a few) were consulted with – while in the meantime, people whose actual properties would be taken by the project were not directly contacted at all.

In a shortened summary of the community engagement feedback that appeared in the letterbox, it states: *"We asked people what they thought of the preferred rapid transit route between the airport, Puhinui Station Interchange, Manukau and Botany. Of the 62 responses, 83% of people were in support of the preferred route."* This is misleading. The only 'options' referred to here were whether the route through Manukau City itself would go via the Manukau Train Station, or leave the station out and go along the adjacent road instead.

We consider that with a project of this extreme magnitude, more should have been done in the planning stages to involve the local community and landowners directly affected.

It feels to us as though the project has been pushed through underground, in a way whether intentional or not) that has misinformed those directly affected until the last possible moment when the designation was about to be applied for. This does not seem fair, equitable or democratic.

We are concerned that many people in our area will not have been able to access the information. There are many here for whom English is a second language. And many busy living from pay cheque to pay cheque to survive in these difficult pandemic times. These people will not have had an equal chance to participate in this process.

As our representatives to Council, we ask that the Ōtara-Papatoetoe Local Board supports the affected residents throughout the coming process.

### **Attempts to get further information**

At our individual meeting with the Supporting Growth/AT representatives, we asked about the business case that has been put together and, specifically, what other options were investigated. One we suggested was that rather than going through the residential area, why not take the rapid transit directly from the Puhinui Station to the Manukau Station along the corridor already developed for that purpose. We did not get a satisfactory answer to our question.

The representatives there seemed focussed on telling us about the designation process, and what would happen when our land is required.

We emailed Supporting Growth, asking for further information, but were told, once again, no further information could be provided to us about the actual route, citing privacy concerns for other land owners.

### **Local MP, Media**

Some of us have appeared in the *NZ Herald* and *Stuff* talking about the concerns. There are others further along the route near Botany Town Centre who have done the same.

We have also approached Arena Williams, our local Member of Parliament. She has been extremely helpful in trying to get further information from Auckland Transport. She has held a meeting for residents (some Local Board members also attended) and there is another meeting planned for Wednesday 30 November, where AT representatives will be in attendance.

### **Main concerns**

To summarise, some of the main concerns we have are:

#### Uncertainty

This project puts landowners in an untenable situation. They are in limbo. Some planned to stay in their homes until their deaths. Others planned to sell in the next few years.

Having a designation (or even a proposed designation) on a property means it will be difficult to sell. And until AT applies for and gets central government funding, it is our understanding they will not be looking to buy properties for the foreseeable future.

This uncertainty is putting people under incredible amounts of stress. We have heard reports of people being extremely upset, to the point of depression and anxiety attacks.

#### Property Value and liveability

Having a designation on a property affects its value. For those whose whole properties are planned to be taken in their entirety, it affects how much those properties can reach.

For those whose properties have a sizeable chunk taken away from the front of them, they will be left with a roadway very close to their front doors. This will impact their quality of life. In addition, in some cases, it will leave them with a tiny property footprint that will be incredibly hard to either develop or sell.

Another concern is that given the uncertainty, people may neglect to develop and maintain their properties in the meantime, in the knowledge that the houses will eventually be taken and demolished. This will then potentially have a negative impact in terms of property values for the area that may apply when and if AT gets the central government funding to buy the properties under the Public Works Act.

#### Fairness

The process seems very unfair and one-sided. It feels like AT has all the power and we have none.

#### Process

The consultation process to date has not been effective in letting people know about the project and its true scale and impact. It seems very wrong that those people most directly affected have not been contacted directly until almost the very last minute. (Indeed, some never received their letters at all.) It also seems wrong that those with properties adjoining



the proposed route have not been involved in the process either, as the project will have a massive impact on them and their property values too.

### Potential

In none of the documentation seen so far, has there been any mention of potential improvements to the public facilities in the affected area, to go along with the proposed rapid transit route itself. If the project does end up going ahead, it would be an opportunity for this area to have some extra investment in public facilities (e.g., pocket parks). If the large swathe of land is to be taken anyway, and developed with a rapid transit route and bridge, we would urge AT to ensure that some of that land is used as a buffer for neighbouring residents (e.g., along Freyburg Ave), and that it is landscaped appropriately. There is a dearth of parks in this Puhinui area, with the closest playground being at Sunnyside Reserve. With the residential intensification occurring in the area, there is a need for places for people to relax and play. Perhaps the negative outcome of a rapid transit route could be somewhat ameliorated by sensitive landscaping and investment in seating, playground equipment, plantings, etc.

### Equatability

We are not a flash area in comparison to many other parts of Auckland City. We are a strong community, however, with many people having lived here their whole lives (and some families have been here for generations). We do not have the financial ability to take this project to its legal conclusion (to the Environment Court) if necessary. We wonder if this type of project would have ever been proposed if it were in a more wealthy suburb of the city.

### **Local Board Involvement**

As our representatives to Council, we ask that the Ōtara-Papatoetoe Local Board support us in our efforts to raise awareness about this project and its impacts.

We ask that the Board require more detailed information from AT about the actual route, including properties affected (there may still be some people completely unaware their properties are affected if they did not receive their letters in the mail).

We also ask for continued support as the designation process is undertaken throughout 2023 and beyond.

### **Attachments**

1. *Southwest Gateway Programme Engagement Summary December 2017 to December 2018* <https://at.govt.nz/media/1981430/southwest-gateway-programme-summary-report.pdf> too large to attach here but available by scrolling down on the following website page: <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-transit>
2. *Southwest Gateway Programme Engagement Summary January to December 2019* [https://at.govt.nz/media/1983567/southwest-gateway-public-summary-report-sept-](https://at.govt.nz/media/1983567/southwest-gateway-public-summary-report-sept-2019.pdf)

[2020.pdf](#) too large to attach here but available by scrolling down on the following website page: <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-t-ransit>

3. *Airport-Botany 20 Connect Southern Local Boards 17 September 2018*

<https://www.scribd.com/document/393138223/2018-08-17-Southern-Local-Board-Cluster-Meeting-V2> or

<https://fyi.org.nz/request/8884/response/29778/attach/5/2018%2008%2017%20SouthernLocalBoard%20ClusterMeeting%20V2.pdf>

## Flood Hazard

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on flood hazard for properties near the BRT route

### Reasons for Submission:

The Assessment of Effects on the Environment (AEE) (pp. 91-92) notes that a '100 year flood' calculation is being used to in modelling to assess the impacts of flood hazard. It recommends that there be no increase in flood levels for existing authorized habitable floors that are already subject to flooding. It also notes there should be no more than a 10% average increased flood hazard for the main access to authorized habitable dwellings.

Given the recent catastrophic floods in the Auckland region and elsewhere this summer, along with the predicted ongoing changes to the climate including a greater frequency and severity of extreme natural events such as rain storms and floods, I think both AC and AT should look at whether the level of risk is acceptable to the community. At the design stage of the BRT project, AT can consider ways it can contribute to lessening flood hazard in the surrounding areas (e.g., by looking at the creation of a 'ribbon park' that would help absorb stormwater (see my other submissions on this topic) using land acquired for but not used for the BRT route infrastructure.

### Seek recommendations:

- That AT and AC reconsider the use of the '100 year flood' calculation and the no more than 10% increased flood hazard risk, and whether this level of risk is acceptable to the community given recent rainfall events and the potential for increased severity and frequency of extreme weather events in the future.
- That AT consider, at the design stage of the project, ways in which it can further reduce the flood hazard in areas surrounding the BRT route (e.g., stormwater soaked up in a 'ribbon park' created on unused acquired land.

## Land Acquisition

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on properties to be acquired either wholly or in part, near the BRT route

### Reasons for Submission:

The proposed BRT route, if it goes ahead, will require the acquisition of a large number of properties, either wholly or in part. This includes both residential and commercial/industrial zoned properties.

The acquisition will occur by means of the Public Works Act.

Affected land owners are confused. They are anxious. They are angry. They are sad.

At meetings with residential property owners at the Allenby Motel after letters were sent to landowners in August 2022, representatives from Supporting Growth (SG) were at pains to explain that the process would be carried out equitably and fairly. Terms such as ‘market value’ and ‘payments for moving house’ were used.

The fact remains that there are many people living along the route who do not want to move. Indeed, some will struggle to. There are people who have developed their sites into multi-generational homes, and vow to only ever ‘be carried out in a box’. Some people are in the situation of having reverse mortgages on their homes.

There is the concern, too, of ‘market rates’ and what a proposed designation on a property will do to those rates. People don’t know whether to sell early or to hold on. In any case, it is our understanding that AT doesn’t yet have the central government funding it requires for such an enormous transport building project (and significant land acquisition).

Residents have already had letters in the mail from property lawyers saying they can actually sell early if they want to, and that there is an obligation for AT to purchase the properties if they are hard to sell in the current market with a proposed designation hanging over them. This has confused people and given an added layer of anxiety and worry.

There are some who had been planning to move in the next few years (before the 10-15 year construction timeframe). They are now in limbo, not being able to sell privately (who would want to buy a property for a fair price with a designation on it?), but not yet being able to negotiate with AT about acquisition.

Those of us with properties to be acquired under the designation have been warned that there will be developers knocking on our doors to buy our properties at low prices so they can land bank and hold out for a higher price from AT close to the construction period. As

mentioned in my other submissions, this is an area where people are not always able to advocate effectively for themselves in such situations.

People we have heard of in other areas (e.g., residents affected by recent roading projects in Pakuranga) have had to fight hard to get more than the minimum value for their properties that was offered by AT and its valuers. Some people in affected properties along the BRT route, are likely to struggle with this part of the acquisition process. They will need independent support and guidance.

Some people are faced with the prospect of only part of their properties designated to be acquired. Many of them would prefer their properties be designated for acquisition in their entirety, as their properties will be either unlivable or unsellable with large chunks taken off the front for the project.

Others, who are not impacted directly by their properties being acquired, live in properties that are adjacent to designated ones. They, too, may well wish to leave the area to avoid the negative impacts of noise and vibration, etc. But they are now in a position where they will adjoin designated land, so their land value will be negatively impacted.

Sadly, the uncertainty caused since the letters of August 2022 has caused some members of our community to leave the area already. One young family we know has moved to another suburb. They have a four year old who was due to start soon as a new entrant at Puhinui School soon. But because they want certainty and continuity for their children throughout their school years, and for their kids to make friendships at primary school that continue through intermediate and high school, they have chosen to move and establish elsewhere. They were concerned that they may need to leave the area sometime when their kids are at intermediate or high school given the timeframes of the BRT project, and didn't want to take that risk. They are a loss to our community.

People need greater certainty than they have currently. To stay or to go? To sell sooner or hold out till the bulldozers are revving up? People don't know what to do. More support is going to be needed in the community to help people navigate the process and come to decisions they can live with.

#### **Seek recommendations:**

- That independent support mechanisms be put in place, funded by AT similar to 'Friend of the Submitter', to help those impacted by property acquisition to advocate for the best outcomes for themselves.

## Route and Station Options

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Route options and station options chosen for entire length of BRT (covers NoR 1, 2, 3, 4a and 4b)

### Reasons for Submission:

#### 1. Project Objectives:

Form 18 and other documentation for the NoRs note that the *primary* project objective for the Notices of Requirement are to provide a bus and rapid transit corridor that connects the key destinations of

- Auckland Airport (from the Orrs Road boundary),
- Manukau City Centre and
- Botany Town Centre.

There is also the *second* objective of providing corridors for both public transport and active modes (walking and cycling).

#### Cars and freight vehicles:

It is notable that the continued efficient use of private cars for passengers, and efficient use of road vehicles for freight are not mentioned in the list of project objectives.

#### 2. Pūkaki Creek:

Also notable is that the section of the eventual route from the airport itself to Orrs road is not part of the study area or the sections covered by the NoRs. The Assessment of Environmental Effects (AEE) section 2.1.1 addresses this, noting that, *“Through the Eastern Access Agreement, it was agreed that the form of the bridge over Pūkaki Creek would remain as a two-lane bridge in perpetuity. This bridge is located to the West of Orrs Road and is a crucial element for the future connection of the Project to Auckland Airport.”*

Indeed, if the configuration of this bridge is not altered to make it wider, or an alternative bridge structure provided, none of the overall BRT project outcomes will be achievable. The end of the NoR will see enormous traffic jams as private cars and rapid transit buses try to navigate what is already a narrow, restrictive bridge.

It seems ludicrous to continue with the social anxiety and upset being caused to affected residents and business owners, and work involved for staff at AT, SG and AC, etc., in progressing the NoRs until there is a clearer indication that the bridge can be widened or another bridge structure built over the Pūkaki Creek.

### 3. Route Options considered:

Appendix A (Volume 2) of the AEE assesses alternatives to the chosen route. I refer to this document as the AoA (Assessment of Alternatives).

Page 2 of this document notes the process of looking at alternatives should be

- transparent, robust and clearly recorded so as to be understood by others.
- In addition, an ‘appropriate range of alternatives’ should be considered, and
- The extent of options considered should be proportional to the potential effects of the options.

A range of alternatives were, indeed, considered (e.g., the ‘initial options’ in Figure 8, p. 22). Some of the alternatives followed variations of the final route presented in the NoRs. Other options went further North towards Mangere, or further South towards SH20, or further East on Chapel Road.

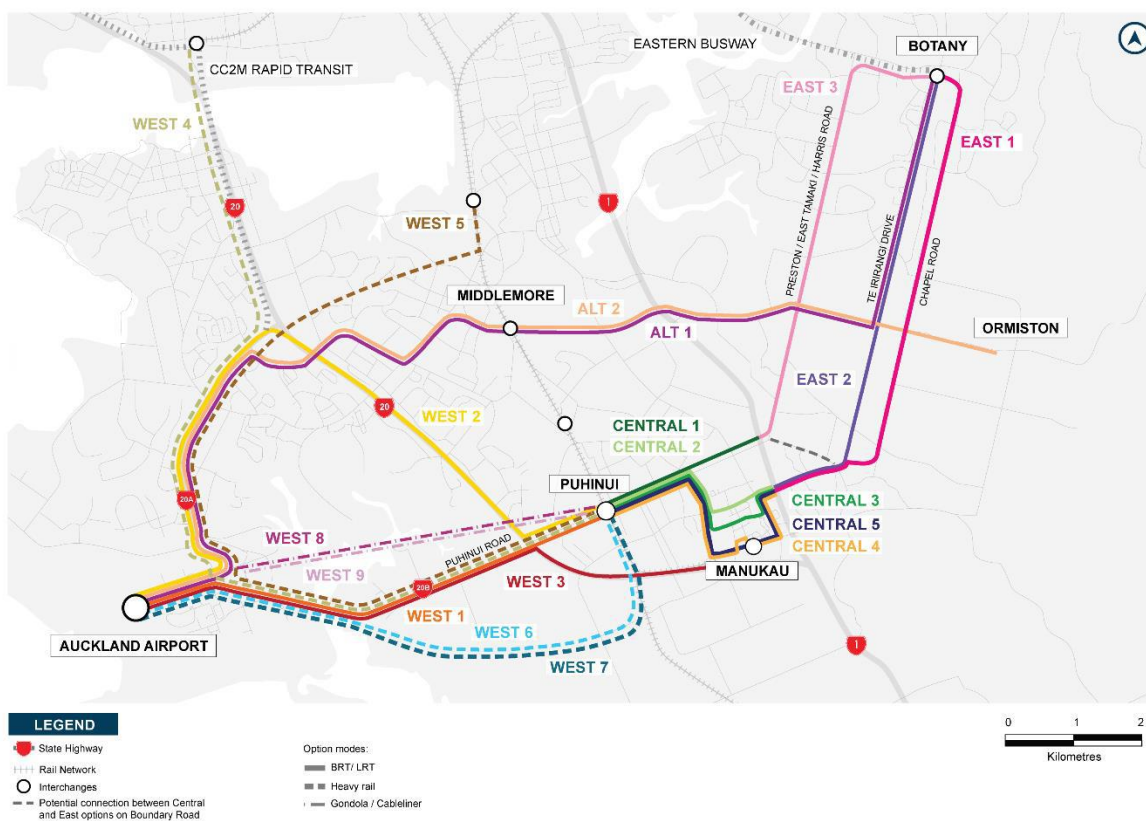


Fig 8 pg 22 Assessment of Alternatives

A shortlist was eventually chosen (map on p.66 AoA) which broadly follows Puhinui Road from Orrs Road along SH20b, over a new BRT bridge at Puhinui Station, continuing along Puhinui Road to Lambie Drive, along Lambie, winding around Hayman Park to Manukau Train Station, then winding through several tightly aligned streets in Manukau City Centre before continuing on directly to Botany Town Centre along Te Irirangi Drive.

Along that route, 12 stations (stops) have been identified where passengers can get on and off buses.

Different modes of transport were also considered as part of the process, with the final decision being rapid transit buses (electric, high frequency, large vehicles with plenty of room for passengers).

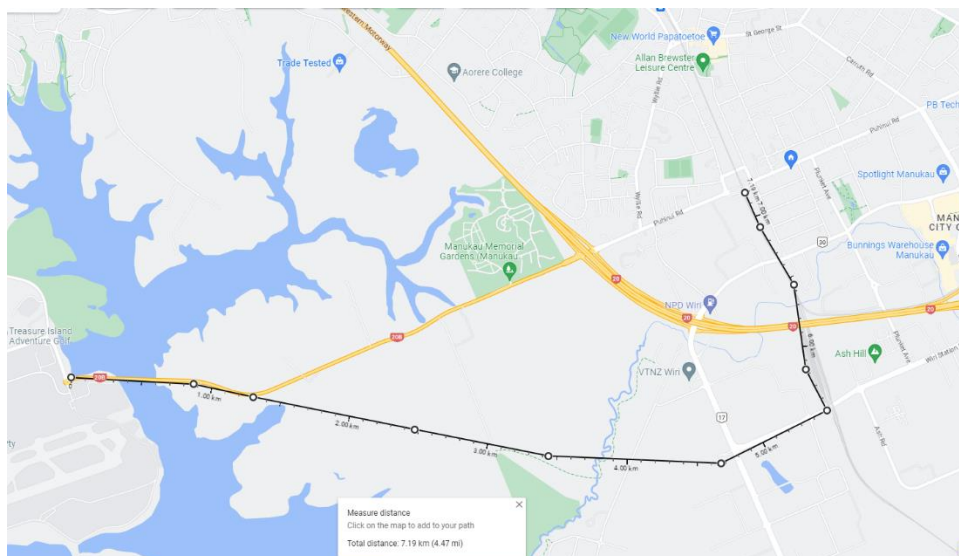
Concerns/Alternative options not in the documentation:

Going back to the primary objective of connecting the three centres – Airport, Manukau and Botany, the route chosen seems to have some significant ‘dog legs’ that will make the journey slower and less direct. In particular, the winding route around Hayman Park and back through Manukau City Centre, before finally reaching Te Irirangi Drive, appears unnecessarily convoluted.

I would like to know why some other options do not appear in the documentation to have been considered at all.

Airport-Puhinui Station

As there are no planned stations/stops between the Airport and Puhinui Station, why does the route go down SH20b and the Western end of Puhinui Road to reach Puhinui Station? Could it not have been aligned in the vicinity of the West 6/West 7 original options?



Indicative map of route West 6 or 7 (as BRT rather than heavy rail)

I note those options were originally considered as part of a heavy rail option, but I see no reason that a BRT route could not have been considered along that alignment instead, going through what is primarily rural land or land being developed for industrial or commercial use in the vicinity of Prices Road, with the eastern end approaching Puhinui Station running beside the existing heavy rail line. Aligning a BRT along here would remove the necessity to disrupt a significant number of residential and commercial land owners along Puhinui Road. Yes, there would be alternative land owners to negotiate with, but these would be fewer in number and have less significant building infrastructure already in place.



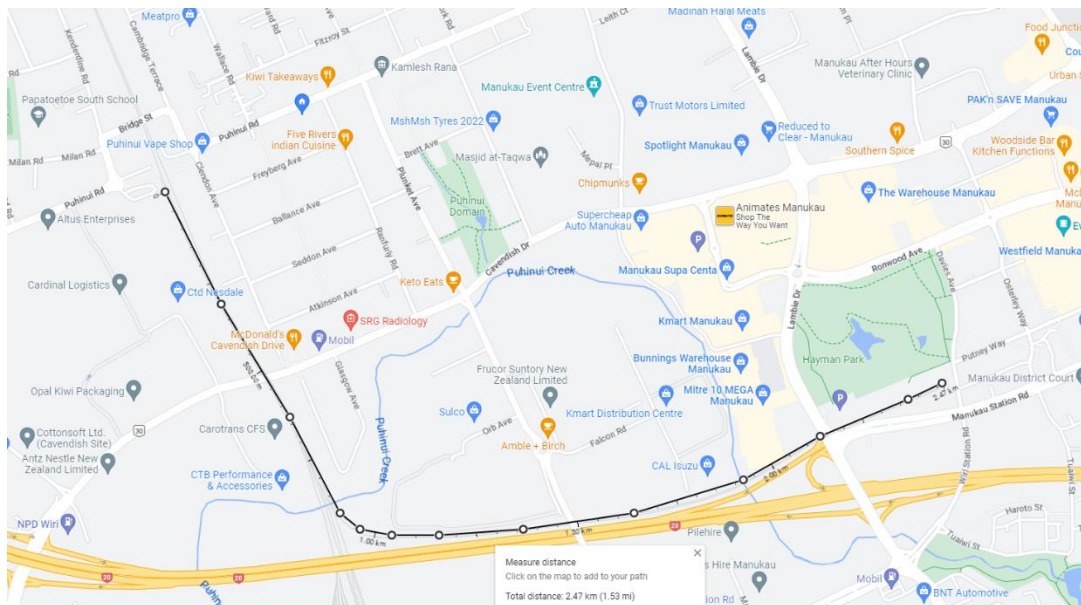
### Puhinui Station-Manukau Station

I also question why the proposed BRT route continues from Puhinui Station along Puhinui Road via a significant, large, bridged structure, to a proposed new station at the intersection of Puhinui Road and Lambie Drive, then along Lambie and around Hayman Park to the Manukau Station.

This route will require the purchase of a significant number of existing residential dwellings or part thereof, as well as some commercial zoned land. It will leave remaining residents (an future residents if the area is intensified) living within the shadow and noise of a large bridge structure.

I am aware that going down this route, along with the addition of a station at Lambie Drive, may pick up some passengers who live within walking distance of this new station. However, there are questions about how many passengers would actually access this station, referred to in the documentation (e.g., Figure 16 on p.16 of the Assessment of Transport Effects) and it may be that a more direct (i.e., faster) route between Puhinui Station and Manukau Station exists.

I cannot find anywhere in the options documentation that shows an option has been considered of constructing a BRT route either alongside or instead of the heavy rail connection that has recently been completed to link the Puhinui and Manukau Stations.



Indicative direct route Puhinui Station to Manukau Station via BRT next to or instead of existing rail line spur

Going along this route directly links Puhinui Station to Manukau Station. It would, yes, mean that some people living in walking distance from the proposed Lambie Drive station would not be so close to a BRT station, but if the primary objective of the project is to link the Airport-Manukau-Botany centres, this may be a worthwhile trade-off. There are other non-structural options such as regular shuttle buses or vans to take people from this Lambie area (and others around Papatoetoe and elsewhere on the route) directly to either Puhinui or Manukau stations to catch the BRT vehicles to either the Airport or Botany.

### Manukau Station-Te Irirangi Drive

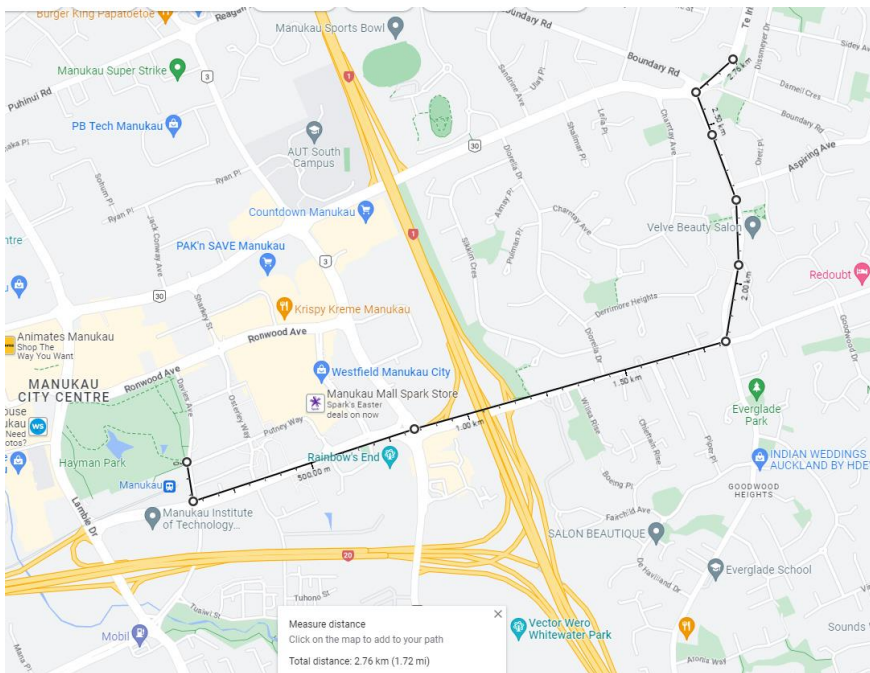
The dog-leg in the proposed route continues from Manukau Station along Davies Ave, winding along Ronwood Ave and Great South Road before turning sharp right to travel along Te Irirangi Drive for the remainder of the journey to Botany. The Social Impact Assessment (SIA) notes in Appendix B that Westfield Manukau is planning to develop its own public transport hub near Friendship House. The SIA notes Westfield asked that a bus stop be put on Ronwood Ave. I am unsure how this request for a bus stop has turned into an entire BRT station on Ronwood Ave in the NoR documents. I would like this explained to me.

If, once again, we go back to the primary objective of getting people from the Airport-Manukau-Botany, this dog-leg seems counter-productive, adding to the length, complexity and time of the journey, not to mention the significant portions of commercial land that will need to be taken to fit the BRT into a widened carriageway. In addition, (see Fig 16 of the ATE referred to in section 4 of my submission below) it appears that adding the Ronwood station onto the route will not significantly increase patronage compared with focusing efforts on the existing Puhinui and Manukau stations.

A much more direct route that I cannot see considered in the documentation that I could find, would be to take the BRT directly from the Manukau Station along Station Road, up Redoubt Road, down Hollyford Drive (which already has an extremely wide berm for its entire length that would mean no need for property acquisition) to link with Te Irirangi Drive.

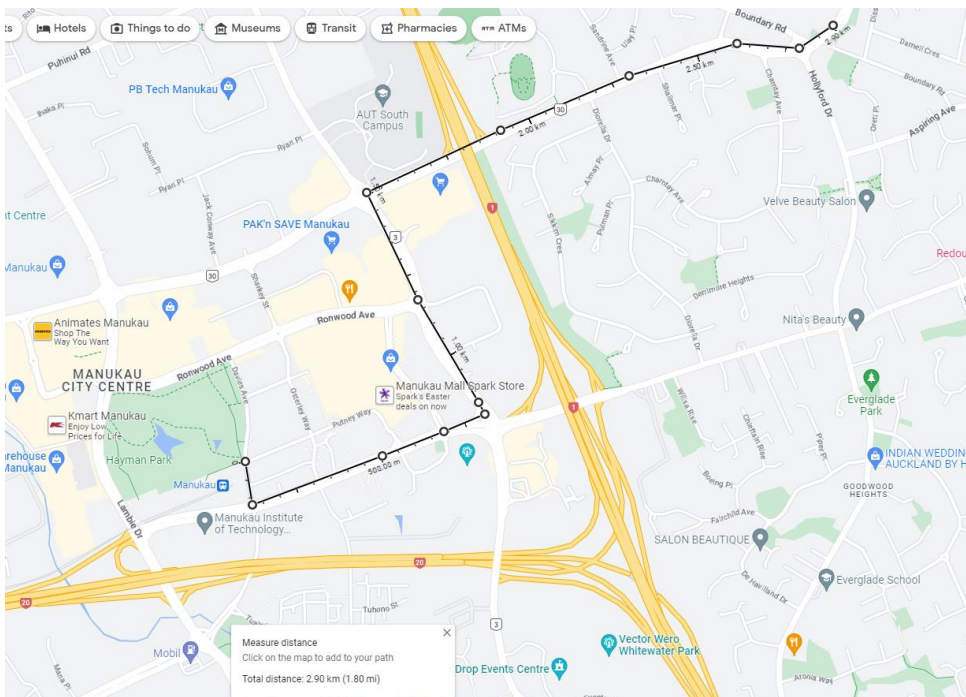
I am aware that in a number of the NoR documents, taking the BRT along Manukau Station Road and turning onto Great South Road to get to Te Irirangi was discounted as it would interfere too much with the Great South/Manukau Station/Redoubt Road intersection with car and freight traffic. This argument does not seem to have interfered with plans elsewhere on the route to interfere with traffic on existing road ways (e.g., Puhinui, Lambie, Davies, Ronwood, etc).

I would like this route to be investigated for its potential for the BRT, including the number of affected residential properties along Redoubt Road that may be affected, and the gradient of the road.



Potential more direct route Manukau Station to Te Irirangi Drive via Manukau Station and Redoubt Roads - Hollyford Drive

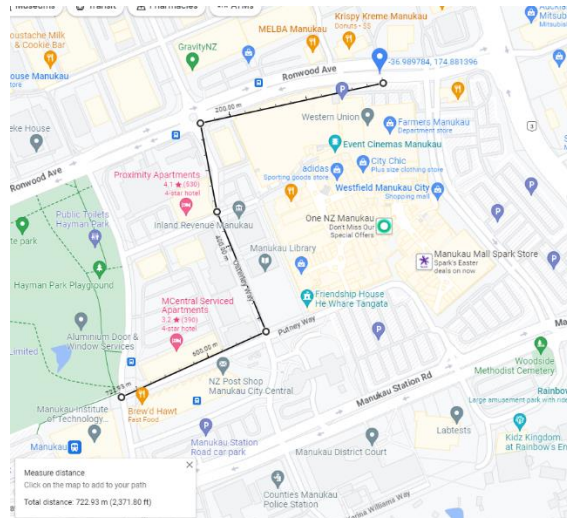
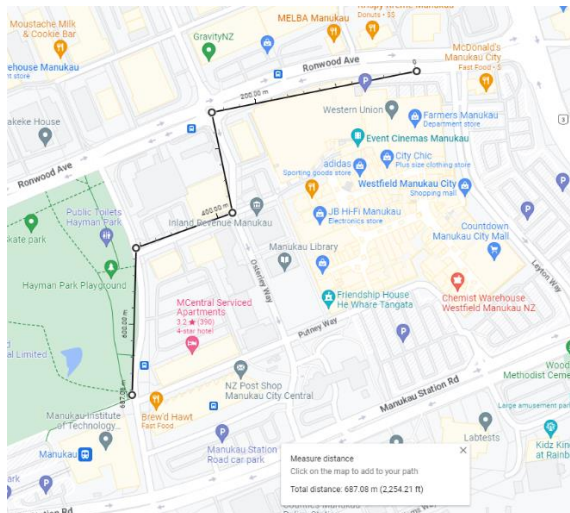
Another option could be going along Manukau Station Road, Great South Road and then to Te Irirangi Drive, to avoid the residential area along Redoubt Road along with the steep gradient of Redoubt Road to Hollyford Drive.



Potential more direct route Manukau Station to Te Irirangi Drive via Manukau Station and Great South Roads

While people closer to Ronwood Ave would not have a dedicated station there under these options, there is the shuttle bus/van idea noted above for the Lambie station catchment, and if walking infrastructure (e.g., covered ways) were improved in the Manukau City Centre streets, it is approximately 700m depending on the route taken, well within the 1km walking

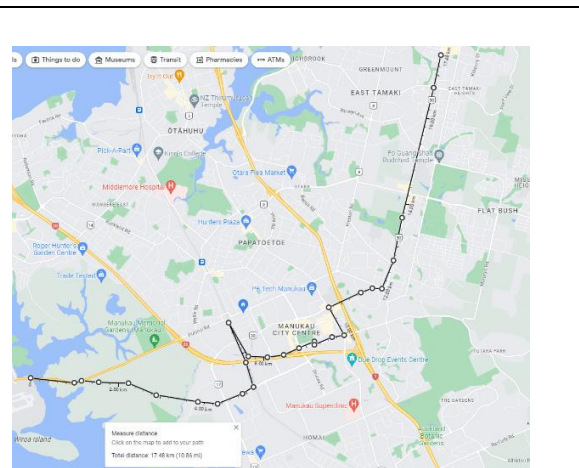
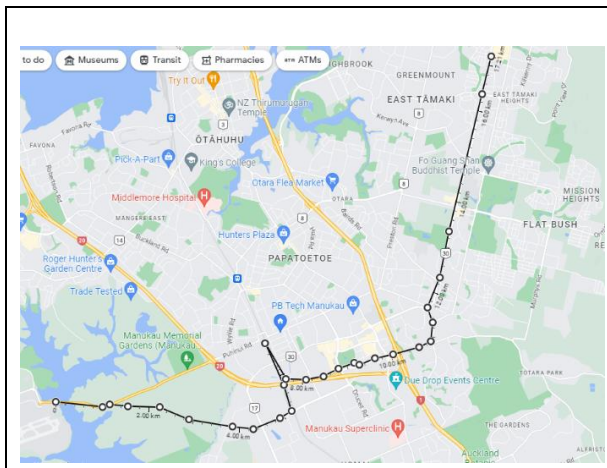
distance to a rapid transit station that is quoted elsewhere in the NoR documentation. (See approx. walking distances on maps below.)



Distances to walk from Ronwood Ave near Gt St Rd to Manukau Train Station

I would like AT to consider and let submitters know about these other options that do not seem to have been considered in the documentation. These other options would be

- more direct (avoiding the dog leg around Hayman Park/through Manukau City Centre)
- faster (with less stops)
- requiring the acquisition of fewer residential and commercial properties along the route.



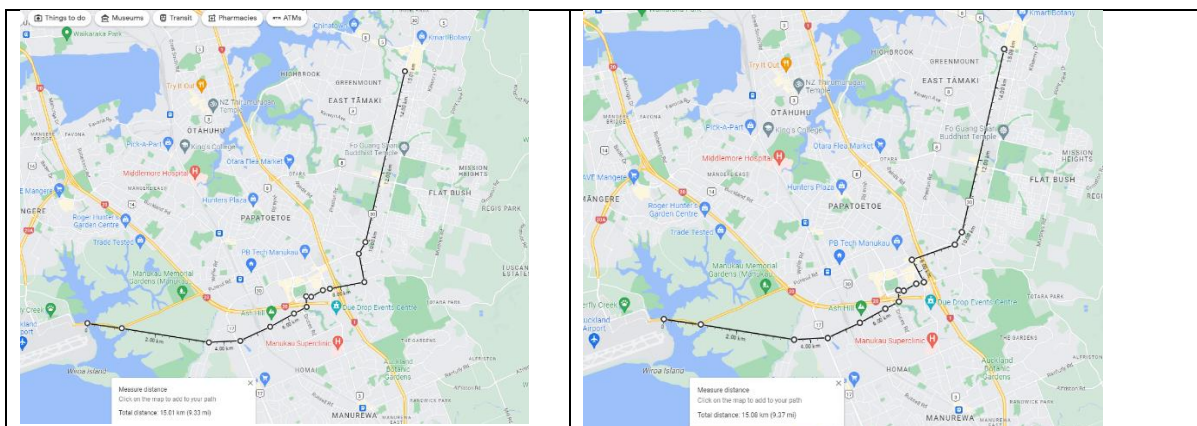
Two potential indicative alternative overall routes Airport-Manukau-Botany

Overall Route – role of Puhinui Station

When put on a map, the options I have requested be re-looked at have an obvious detour to the Puhinui Station (as does the proposed BRT in the NoRs).

Another option would be to not go through the new Puhinui Station at all. If the true main objective of the project were to link the Airport-Manukau-Botany route directly, this option would seem to directly achieve that objective. This would be another option for AT to report back on.

I imagine it would be unlikely to gain much political support given the huge amount of money that has been spent on building a very large station at Puhinui already it seems to the outside eye at least, to have been designed with the BRT bridge option firmly in mind. (The Puhinui Station's location to the South of Puhinui Road alignment and the large verandah which has been designed to link with the proposed bridge.)



Two potential indicative alternative overall routes Airport-Manukau-Botany sans Puhinui Station

4. Station Options considered:

It appears from information in the Assessment of Traffic Effects (ATE) figure 16, which estimates daily boarding numbers at stations on the route in 2038, the expected numbers of passengers accessing the BRT by the Lambie Drive and Ronwood Ave BRT stations will be well below the expected numbers using other stations, notably the existing Puhinui and Manukau Stations.

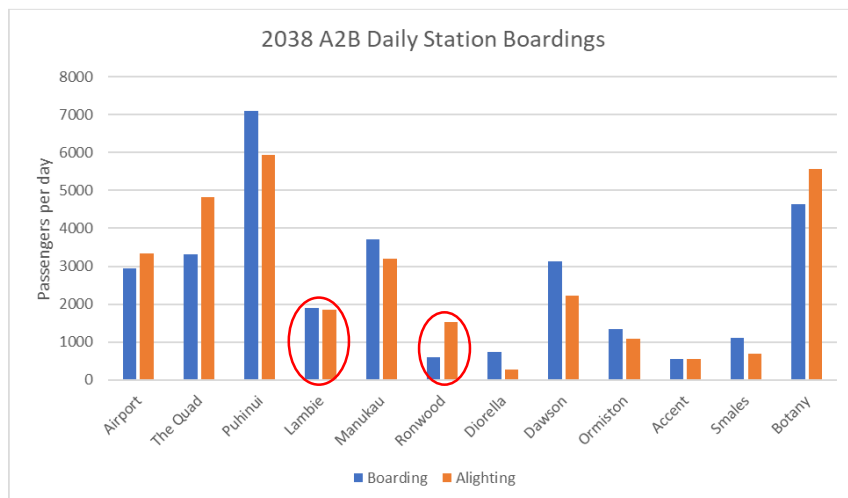


Fig 16 from ATE

This feeds into my questions about the need to take the BRT route via Puhinui Road, Lambie Drive, etc., with the dog-leg back down Davies and Ronwood Aves.

If the main objective of the project is to get people quickly and efficiently between the Airport-Manukau-Botany, the addition of smaller stations along the way such as Lambie and Ronwood seems to not directly support that objective.

(Note, too, that many of the other stations in Figure 16 above that are not associated with a shopping centre or existing major transit station, are also expecting very low daily boardings – e.g., Diorella, Accent and Smales. These stations should also be looked at again to determine whether they actually assist in achieving the main objective of getting people rapidly between the Airport and Botany.)

I also question why, in the plans shown in the NoR documentation, there are no stations located between Puhinui Station and the Airport, given the significant new development of commercial areas in the general area of Prices Road, etc.

#### Lambie Drive

The documentation, and time spent talking with AT and SG staff at meetings, seems to suggest that the main reason for going along Puhinui Road and having a station at Lambie Drive, is to provide people within walking distance of that station, the opportunity to get on and off the BRT. (With the added factor of encouraging high density 6-storey residential intensification around public transport stations.) This is mentioned in some of the documentation (e.g., p. 106 of the AoA). However, p. 107 of the document notes that the Lambie Station is a 'minor priority'.

I would like to see other, softer, non-hard-infrastructure options, researched and reported back to AC and the community. For example, frequent, rapid mini-shuttles that circulate from that Lambie-St George Street area, taking people to either the Puhinui or Manukau Stations to access the BRT.

#### Ronwood Ave

In relation to the proposed Ronwood Ave BRT station, I note (in Appendix B of the SIA) that Westfield Manukau has its own plans for expansion, including extending its current building footprint to cover the large existing open car park along the boundary with Great South Road, and developing its own public transport hub. This plan for a separate, new transport hub seems a little odd to me, given that so much resource has already gone into developing the new Manukau train station and the Manukau bus station right on the doorstep of Westfield Manukau. These relatively new bus and train stations are 700m or less from the furthest corner of the current Westfield building footprint where Farmers department store is. (Well within walking distance from the shops.) If resources were put into improving the walking and cycling surfaces leading from the shops to the bus and train stations (e.g., suitable wide shared paths, covered areas where required), it seems to me that the proposed Ronwood BRT station would be unnecessary.

I would like to see AT reconsider and explain more fully the reasoning behind the perceived need for a BRT station at the Ronwood location, given the close proximity of the existing bus and train stations to the Westfield shops. Is it something AT has agreed to in order to acquire support from Westfield Manukau given the significant disruption the construction of the proposed BRT will have on the commercial area noted in Appendix B of the SIA? I cannot see any other logical reason for locating a station at Ronwood Ave, despite having read through the documentation provided in the NoR.

#### Wyllie Road area potential station

Given the rationale for the station at Lambie Drive, which has largely been given as serving the residential catchment within walking distance of that station, why then, is there not a similar station to serve those in the Western part of Papatoetoe, in the region of the intersection of Wyllie Road with Puhinui Road? It would seem that people are required to make their way all the way to the Puhinui Station if they live anywhere near Wyllie Road/Pah Road etc., which seems to not be the same reasoning compared with the station being provided for those living in walking distance of Lambie Drive and the proposed station there.

#### SH20b Potential Station(s)

There is currently significant new development of land that was previously zoned rural, into commercial zoned properties. This is currently mainly occurring on the Southern side of SH20b in the vicinity of Prices Road. Given this commercial development, along with the fact that the Manukau Memorial Gardens are a significant destination, it seems bizarre to me that there are no BRT stops planned to serve this area of the route.

P.106 of the AoA assesses this commercial development area as being a low-density land use that does not warrant a BRT station. When talking to AT and SG staff, I was told that if people working in that area wanted to use the BRT, they would either have to get off at Puhinui Station and catch a bus or uber to work, or go all the way to the Airport, then catch a bus or uber back to work. This seems unlikely – people will just take their cars, adding to the congestion on the road network.

If the dog-leg around the Manukau City Centre with its added station goes ahead, with the delays traversing that area and the Ronwood station, why not allow a little more delay by adding in a station or stations in the vicinity of the Memorial Gardens and the new commercial zoned area near Prices Road?

#### 5. Hard Infrastructure/Mode Options:

Throughout the NoR documentation is the obvious desire to pursue a hard infrastructure approach to the perceived problem of there not currently being an effective, resilient, frequent, fast way for people to get between the Airport-Manukau-Botany. (e.g., AEE Appendix A 4.1.2.1 where non-infrastructure interventions are discounted in favour of new

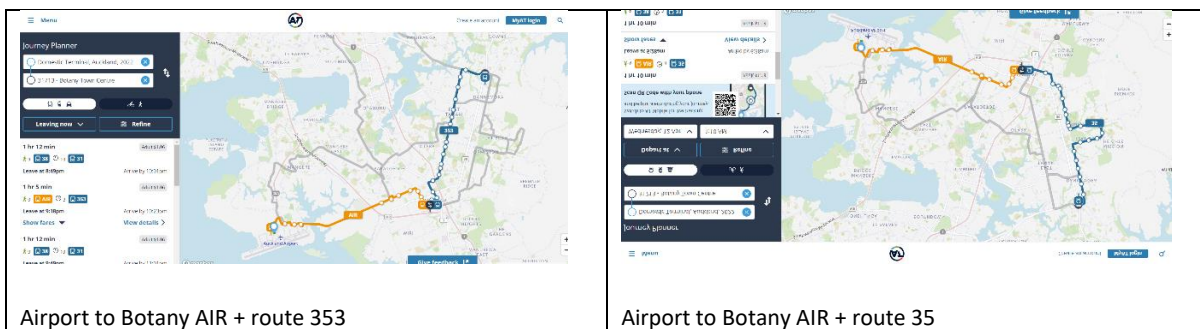
infrastructure as opportunities for the future. This seems to me, to be backwards – why not thoroughly investigate non-infrastructure interventions first (e.g., new bus routes, more frequent bus services) before embarking on costly, long-term, non-retractable infrastructure projects?

Hard Infrastructure for BRT

Section 1.3 of the AEE notes the current bus routes do not get people quickly enough from one end of the route to the other and that the area is not well-served currently by public transport. Appendix A of the AEE (the Assessment of Alternatives) section 4.1.2.1 concludes that hard infrastructure is the best option to solve the problem.

I went onto the AT Journey Planner site, to look at the current bus routes running between the Airport-Manukau-Botany.

The orange AIR bus runs frequently between the airport and Manukau bus station (adjacent to Manukau Train Station) along Puhinui and Lambie Drives. From Manukau bus station to Botany there are two main existing bus routes – the 353 bus that goes via Preston and Springs Road, and the 35 bus that goes via Chapel and Murphys Roads.



It is notable that neither of these existing bus routes between Manukau and Botany actually go via Te Irirangi Drive currently. Given that Te Irirangi Drive currently has a faster speed allowance (60kph) compared to most of Preston/Springs or Chapel/Murphy, we don't know how fast it could actually be to go by bus now if it were to go via Te Irirangi Drive. I would like to know the comparison between a bus travelling along Te Irirangi Drive between Manukau and Botany, and the current buses that go via either the 353 or the 35 route.

Te Irirangi Drive is the route for the proposed BRT. It already has a wide median which was designed with some form of rapid transit in mind. Current transit times include the slow speed bus route 353 or 35. If this section of the BRT were to be built on the median as suggested in the NoR, it may give enough of a boost to the speed of the Airport-Manukau-Botany link without the enormous disruption caused by the hard infrastructure proposed elsewhere on the route (e.g., Puhinui Road, the BRT bridge linking Puhinui Station, etc.)

I would like AT to research and report back on how long it will be expected to take to go by bus via Te Irirangi Drive both now and when the BRT would be expected to be built (10-15 years). At the moment we are comparing the time it takes to take a future BRT route



between Manukau and Botany, against how long it takes to go now via either the slower Preston/Springs or Chapel/Murphys, not via the faster Te Irirangi.

We need to be comparing apples with apples, and with the information contained in the NoR I am comparing apples with carrots.

It may be there is not as much need for a hard infrastructure approach for the entire length of the route (including the BRT bridge at Puhinui Station), if the Te Irirangi Road section were built first and bus schedules and routes were re-assessed and re-jigged, then the situation looked at again. However, understanding the need to protect/designate land ahead of time, I'd like to at least see some scenarios with the alternative route (no BRT bridge etc., at Puhinui Station, go via existing AIR bus from Airport to Manukau, then a BRT directly going along the median of Te Irirangi Drive) to compare the right fruit with the right fruit, not with a vegetable.

#### Mode Options and Public Transport Usage

This is not my area of expertise however; I would like to know how much research AT has done into the future of transport technology.

Will we still be using large scale buses in twenty years' time on fixed routes, or will there be other options? Things that come to mind are self-drive cars or mini vans that you can arrange to pick you up and drop you off exactly where you want to go. If this is the future of transport technology, will there be a need for large-scale infrastructure projects like the one planned for in the NoRs? Will we need to be planning for large buses to go along pre-determined routes? Or will we be looking at smaller-scale, more agile technologies and the opportunities that go with them?

I would like to see proof that AT has considered the future options and isn't just planning for current technology in a future world.

Living on Puhinui Road, with my office where I work from home with a window looking directly across the road to an AIR bus stop, I get to see the frequent orange AIR buses passing by. I would say that 99% of the time, they have, at most, three passengers on them. Often they go by with no passengers at all – just a driver. This does give me pause to wonder how much the proposed BRT will actually be used.

If we go to the airport we use the AIR bus, and can confirm that more passengers use it between the airport and Puhinui Station than they do between Puhinui Station and Manukau Station. Our daughter attends university at the Auckland University South Campus on Osterley Way. She often takes the AIR bus to and from her lectures. She calls it her 'personal uber' as she is generally the only person on the bus, and it drops her almost outside our door.

I realise the proposed BRT isn't planned to be constructed for 10-15 years, but I really do wonder what 'push' factors will cause people to use the service over and above the 'pull' factor of a new, purpose-built, frequent rapid bus infrastructure.

I would like to see information from AT to know they have considered the current low patronage of sections of the AIR bus route, and how this will change with a new BRT system in place.

#### Seek recommendations:

- In relation to section 1 above, delay continued development of the NoRs until crucial decisions are made about the bridge (or an alternative bridge structure) over Pūkaki Creek.
- In relation to section 2 above, require AT to reconsider and research and report back on alternative routes specifically:
  - BRT route that goes from airport directly to Puhinui Station *not* using Puhinui Road, but instead in the area of the rejected West 6 and 7 routes + adjacent to existing train line South of Puhinui Station
  - BRT route on land adjacent to or currently used for the rail link from Puhinui Station to Manukau Station
  - BRT route without the dog-leg through Manukau City Centre – go directly from Manukau Station, to Great South Road, then up Te Irirangi, or up Redoubt to Hollyford down to Te Irirangi.
  - BRT route via the rejected West 6 and 7 routes, from Airport to Manukau and on to Botany without going via Puhinui Station at all
- In relation to section 3 above, and at the same time as reconsidering the need for the BRT route to follow Puhinui/Lambie/Hayman Park/Davies/Ronwood at all, require AT to reconsider, research and report back on the need for the BRT stations that appear to expect relatively low daily passenger boardings as shown in Fig 16 of the ATE including:
  - Lambie Drive
  - Ronwood Ave
  - Diorella, Accent and Smales
  - Also in relation to section 3 above, require AT to reconsider, research and report back on an additional station location between Puhinui Station and SH20 in the vicinity of the intersection of Wyllie Road with Puhinui Road to serve the residential area of western Papatoetoe that not within easy walking distance of Puhinui Station.
  - Also in relation to section 3 above, require AT to reconsider, research and report back on additional station locations between Puhinui Station and the Airport to serve the Manukau Memorial Gardens and the new commercial development occurring on the southern side of SH20b along the proposed BRT route.

- In relation to section 4 above, require AT to reconsider and research and report back on the necessity for this hard infrastructure as a response to the perceived problem.
  - This to include running scenarios of the time it takes to travel by bus now along Te Irirangi Drive from Manukau to Botany, and to trial existing AIR bus Airport-Manukau (no BRT bridge at Puhinui) with Te Irirangi median strip BRT to take passengers directly from Manukau Station to Botany via Te Irirangi Drive rather than on the current 353 or 35 routes.
  - To also include external research into future technologies and their impact on the value/appropriateness of the fixed-route BRT (e.g., self-drive cars/vans that are agile and able to go via any route)
  - To show how AT plans to increase patronage of the current poorly used AIR bus route between Puhinui Station and Manukau Station

## **Businesses and Medical Centre opposite Ranfurly Road (149a-167 Puhinui Road)**

### **Specific parts of designation:**

NoR3

Widening of the roadway in this section of Puhinui Road which takes away on-street car-parking for shops and medical centre (NoR3)

### **Reasons for submission:**

The AEE (p.74) confirms that all the on-street parking outside 149a-167 Puhinui Road will be removed if the BRT goes ahead. It refers to Volume 4, Appendix A for more details. Appendix A is actually about Station Capacity and Access. Appendix B of Volume 4 (Assessment of Traffic Effects) is the Property Access and Parking Assessment that I assume p. 74 of the AEE is referring to. If it is, the appendix mentions other commercial areas (e.g., on the corner of Wyllie and Puhinui Roads), as well as some residential properties that will lose on-street parking, but neglects to include 149a-167 Puhinui Road at all. This leaves submitters confused and adds to doubts about the quality of the research and analysis carried out by AT to date.

The SIA (Social Impact Assessment) confirms that the shops and medical centre opposite Ranfurly Road are one of the most '*relevant places*' for the local community (p. 17). Late in the document (p.50), it notes that while there will be impacts on on-street parking for those businesses, "*structures (i.e., buildings) are not affected therefore businesses are not 'lost'.*" Appendix E of that document notes that there will be loss of some or all on-street parking during construction phases (pp.157-8), and permanent loss of parking once the BRT is operational (p.160).

The Assessment of Alternatives (AoA) – Appendix A to the AEE – also notes (p. 155) that the shops are an "*important social facility.*" And that when decisions were being made about the alignment of the BRT near these shops, widening of Puhinui Road to the South was preferable to widening on both sides of the road, as it would retain the businesses at 149a-167 Puhinui Road. The document also notes (p. 116) that widening on both sides of the road scored adversely as it would have necessitated the purchase of commercial land as well as residential. (Commercial land is more expensive, therefore adding to the cost of the project.)

The AoA (p.154) specifically notes that there is less development potential on the Southern side of Puhinui Road in this section, as it is zoned Single House, and impacted by restrictions on development under the Airport noise contours. It goes on to reflect that there is more comprehensive development potential on the Northern side of the route. Page 58 notes there will be community severance caused by the physical barrier of the BRT. The

businesses at 149a-167 Puhinui Road are on the Northern side, and presumably, if the BRT goes ahead, the Southern side will effectively be severed (cut off) from the Northern other than a few formal dedicated crossing points yet to be designed. But the shops will be able to continue to serve the residential areas to the North.

The block of shops and the medical centre is important to the social fabric of the community. It serves locals for day-to-day shopping and services. It is also a very important shopping area for people passing through. They use their cars, stop to shop, and drive on their way. If all on-street parking is removed, the shops will be unsustainable without this through-traffic business. This was proven during the extended periods of time (months) the on-street parking was either completely unusable or severely restricted during the many road works projects that have been carried out in the recent past (e.g., the construction of the Hunua water main, the construction and re-configuration of the road with the introduction of bus lanes). The businesses really struggled to stay afloat during these times, relying solely on the local people who could walk to the businesses, and some businesses almost didn't make it.

If, in the future, there is intensification of residential development in the surrounding area, and people are encouraged to not have private cars (as there will likely be limited on-site parking provided), these shops will become even more important as shopping destinations for the day-to-day needs of locals. But, from talking to the business owners, the majority of their current business turnover is as a result of through-traffic customers. With parking restricted during construction phases, and removed altogether once the BRT is operational, the businesses may well not still be there to serve the community once the assumed future intensification occurs.

There is actually no guarantee of intensified development in the future. If there is intensified development, however, there is still no guarantee that the custom of the new residents there will be sufficient to keep these businesses in operation. They are, by nature, stop-and-go, convenience store businesses, and without on-street parking, there is no assurance that they will be viable in the future.

Any intensification of residential development will take time. The businesses may not survive through the lengthy construction phase of the proposed BRT infrastructure (years). If they struggled to survive through the months of disruption due to other infrastructure projects that took months, *years* of disruption will certainly be unsurvivable.

In summary, despite the SIA saying the businesses will not be lost as a result of the BRT, I believe they may well be. While the buildings they are in are not directly affected (purchased and demolished) as part of the planning, the businesses may well be 'lost' as long as the plan to remove all on-street parking remains.

Page 53 of the SIA suggests early engagement prior to construction (18 months-2 years) with affected businesses. This doesn't seem long enough for businesses to plan ahead. Later on that page, the SIA refers to the need for strong advocacy from the business community. Given the 'mum and dad' style of the businesses at 149a-167 Puhinui Road, and the fact they aren't part of a strong business advocacy group as you might find, say, in a large mall

type of business structure, the chances of 'strong advocacy' are slim. These business people are working hard to survive as it is without having to suddenly become strong advocates for themselves within proposals by large entities such as AT and AC.

Elsewhere in the documentation it is stated that the businesses will be consulted with during the construction phases. In talking with the affected business owners, they hold little hope that this will be done in a way that helps them at all. They struggled to have any 'say' or assistance from official sources when other roading projects occurred outside their shops which impacted the ability of customers to park there to use the shopping facilities. There is a low level of trust amongst those business people for the reliability of any assurances about consultation from AT if the BRT does go ahead in its present form.

#### **Seek recommendations:**

- AT to provide for independent mentoring assistance to the business owners and operators to properly and effectively advocate for themselves during the process of planning, construction and operation of the BRT
- During construction of the BRT, AT to ensure on street car parking is still fully available for customers of businesses at 149a-167 Puhinui Road
- AT re-configure plans to continue to have on street car parking as part of the final design of the BRT route outside 149a-167 Puhinui Road

## Surplus Designated Land Post-Construction

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Land left-over after construction of BRT – submission on what that land will be used for after construction.

### Reasons for Submission:

If it goes ahead, the BRT will cause massive disruption to the local community. As shown in the Social Impact Assessment, the people who live in NoR 2 and 3 are already in a situation of social deprivation, economically they are not well off, with low household incomes, there are a lot of people renting short-term, it is a relatively transient population despite some people having lived in the area for many years. (In some cases, for generations.) In addition, the Puhinui/South Papatoetoe area is very poorly served with open space and areas for active recreation such as playgrounds. I have had discussions about this in past years with AC parks and community facilities staff who have confirmed this.

The BRT will, effectively, cut the community in half, North to South. There will be some formal road crossings provided, though the location and type of these is yet to be determined. Some may need to be bridged.

The community will need to absorb significant disruption during the construction of the route. The community will be left with a significant new transport route including a large, imposing BRT bridge structure traversing the area.

I am concerned in reading the various NoR documents (see my other submissions) that it appears the left-over land that has been designated and acquired will be used for residential activity after construction of the BRT. (See map in Figure 15 of the AEE.)

The map shows the land not used for the construction of the BRT on the Southern side of Puhinui Road in NoR3, zoned for 'Mixed House Urban Zone – Modified by A2B Team'. Does this mean that any left-over land will be zoned for some sort of intensive residential use? Left over land on the Northern side of Puhinui Road in the area of Puhinui School may also be in a similar situation.

Though I know the philosophy of developing high intensity residential land use near rapid transit stations is embedded in AC's and central government's plans, do we really, truly, want to rely on either the HANA or MANA Airport noise mitigation packages, or 'responsible developers' (Assessment of Traffic Noise Effects p.x) to ensure the people living in such high density residential buildings are adequately protected from the noise, vibration and visual over-looking of a BRT bridge? If the land is zoned Mixed Use Urban Zone, and if this means

people will be living in homes built on land left-over from the construction of the BRT, there need to be strict building *requirements* on developers, that are resolutely enforced by AC.

### Potential for Good

It seems to me, for a number of reasons, that a better way forward for the left-over land would be to rezone as open space and develop a high-quality 'ribbon park' the length of Puhinui Road, linked in with the proposed walking and cycling paths.

A ribbon of green space alongside the BRT could be interspersed with pocket parks, community gardens, basketball courts, and playgrounds. This would 'give back' to a community that has paid a high price for the connectivity of people living and working at Botany and the Airport.

Planting along the green ribbon would add to the visual amenity of the area post-construction, and could also go some way towards government commitments to mitigating the effects of climate change, and the Urban Forest Strategy.

It would also be likely to give 'brownie points' to AT/AC and be a way to bring the community alongside to support the overall BRT project. Engagement in and positivity about the A2B BRT project in the local area is not currently high. If the project were seen to leave something positive for the remaining community in its wake, I think this would go some way to ameliorating people's concerns and mitigating the effects of the BRT construction and operation.

It would help address the lack of public active open space areas in the vicinity, adding to people's health and well-being in what is a socially and economically deprived area. It would also encourage more people to use the walking and cycling aspects of the BRT project. It would mean more people walking and cycling in the area for fun and recreation, rather than just for getting from A to B.

It would also provide something of a green buffer for properties adjoining properties that are to be acquired for the construction of the BRT. Planting trees on the boundary, in particular, would help in some ways to mitigate the visual and noise impacts of the BRT.

### **Seek recommendations:**

- That any left-over designated land be rezoned as open space and developed as a high quality ribbon park with associated facilities along Puhinui Road, Te Irirangi Drive and elsewhere along the BRT route



## Walking and Cycling Infrastructure over NIMT

### Specific Parts of Designation:

Walking and Cycling extensions on Bridge Street/Kenderdine Road/Cambridge Terrace (NoR3)

### Reasons for Submission:

The NoR proposes a large BRT bridge to connect East and West sections of Puhinui Road and passing next to /attaching to the Puhinui Train Station. Cycling and walking infrastructure would be provided not on the BRT bridge, but on the parallel existing Bridge Street and its contributing streets, Kenderdine and Cambridge Avenues. Bridge Street would be widened to provide for this.

Section 11.4 of the Assessment of Alternatives (AoA) which is Appendix A of the Assessment of Environmental Effects (AEE) considers potential routes for walking and cycling in the vicinity of Puhinui Station.

#### Options considered included:

WC1 (at grade walking and cycling on Kenderdine/Bridge/Cambridge)

WC2A, B and C (variously shaped spiral ramps either side of the NIMT crossing the NIMT via the BRT bridge)

WC3 (integrating walking and cycling on the BRT bridge)

WC4 (longitudinal ramps either side of the NIMT crossing NIMT via the BRT bridge)

#### Current situation

Currently there is a footpath across the NIMT across Bridge Street. Pedestrians and cyclists have to negotiate both the busy Kenderdine and Cambridge intersections with Bridge Street in order to get from one side of the bridge to the other. The existing footpath is narrow and steep given the gradient of the bridge, especially on the Western side of the bridge. The footpath is narrow, and close to the carriageway. The carriageway itself is narrow too. It is a bridge built a long time ago for different types and volumes of vehicles.

In the past ten years or so, the bridge was raised to allow for electrification of the NIMT. We spoke with engineers and workers working on the project at the time, and they noted how difficult it was given the soil layers beneath – in order to raise the bridge, they had to drill down significant distances to gain solid foundations. It took them significantly longer (and cost significantly more) than their planning had anticipated. (This needs to be taken into serious consideration if the bridge is to be widened for better cycle and pedestrian access. P.150 of the AoA notes the Bridge Street widening would be relatively manageable and straightforward to deliver!)

### Option WC1 chosen

Section 11.4 of the AoA recommends option WC1 – to widen Bridge Street. This will necessitate the acquisition and removal of several houses, as well as the acquisition of the front yards of numerous properties. It will also require pedestrians and cyclists to navigate Kenderdine Road and Cambridge Terrace, as well as a number of driveways.

One of the reasons for not choosing any of the ramp options was visual – they would look unpleasant. (However a huge BRT bridge is already to be constructed, having a significant impact on the visual amenity of the area.) Another reason was the gradient – it would be difficult to get a gradual enough gradient on these ramps to make for a pleasant or achievable uphill ride on a bike, for example. Properties would have to be acquired in full to build such ramps. (Compared with the perceived lower cost of having to purchase the front yards of numerous properties under option WC1.)

One of the reasons given for not choosing WC3 (cycling and walking attached to the BRT bridge) is the gradient. Section 10.1.1 of the AoA notes that the BRT bridge ramp structure will have a longitudinal grade of 5%, and suggests that pedestrians and cyclists require a grade of no more than 3%.

I would like to know where this gradient requirement comes from. I am no engineer, but I would hazard a good guess that the existing gradient on the Western side of the Bridge Street bridge between Kenderdine Road and the apex of the bridge, is more than 3%, and that other streets feeding into the area are also steeper than this (e.g., Puhinui Road between Plunket Ave and Ranfurly Road, and the up-hill part of Wallace Road and Cambridge Terrace.) I ride a bike around the area frequently, and these parts of the roads require some extra huff and puff. To use this gradient reason as the primary one for not building the yet-to-be-built BRT bridge with space for pedestrians and cyclists seems not quite right.

Another reason for not choosing WC3 is that people would have to walk or cycle quite far back in either an easterly or westerly direction to access the BRT bridge to get over the NIMT. I don't see why the existing footpath across Bridge Street couldn't still be maintained for those people coming by foot or bike from Kenderdine or Cambridge who didn't want to go back to either Raymond or Ranfurly to access the BRT bridge, while going ahead with WC3 for those people travelling along the main BRT route from the directions of either Lambie Drive or the airport.

### Lack of community engagement

A big concern with choosing option WC1 is the appalling lack of community engagement for affected property owners.

At no stage of the pre-NoR lodgment engagement by AT and SG (the subject of a different submission from me), was Bridge Street shown on the generalised info maps dropped in letterboxes. These maps showed a 'broad blue line' down the length of Puhinui road, with no indication that Bridge Street or the properties leading up to it on Kenderdine or Cambridge, would be impacted at all.

Thus it was a terrible surprise for those residents to find, when they were sent letters inviting them to meet with representatives from SG late in 2022, that their properties were, in whole or in part, to be taken for the widening of the bridge.

For many of those residents who are subject to having their front yards taken, this will leave them with property configurations that are untenable. Some affected residents have reported that the new boundary for the carriageway/walking and cycle path will be just 1 metre away from their front doors!

If option WC1 is the one finally chosen and approved through the NoR process, I would hope AT and AC will reassess, *with* those affected residents, whether it would be better in some cases, to purchase entire properties, rather than leaving people in unlivable, and unsaleable homes.

### **Seek recommendations:**

- AT to reassess and report back on engineering and costings to have cycle and walking paths straight across the BRT bridge with access and crossing points at each end of it (approx. vicinity of Ranfurly and Raymond)
- Continue to have (existing but tidied up) cycle and footpaths across Bridge Street as an alternative for those not wanting to go further back either East to Ranfurly or West to Raymond to access the BRT bridge.
- Remove NoR affecting properties that are currently proposed to be taken in whole or part for the widening of Bridge Street to provide improved cycling and walking paths.
- If, in fact, WC1 is the approved option, AT to work *with* affected property owners to see if they would rather have their properties purchased by AT in their entirety rather than just the front yards. AT to add the purchase of properties in their entirety to the project budget (for cases where property owners prefer full purchase to partial)

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) M Shane Robert Haylock

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

172 Puhinui Rd, Papateetoe, Auckland 2104

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

<b>By:</b> Name of Requiring Authority	Auckland Transport
<b>For:</b> A new designation or alteration to an existing designation	Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

### The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

NOR3 - concerns about engagement, route choice, acquisition process, design process

### My submission is:

I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
I or we are neutral to the Notice of Requirement

### The reasons for my views are:

See attached PDF submission

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

My overriding recommendation is that the designation as a whole is put on hold until the issues raised are addressed and that there are better outcomes.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
(or person authorised to sign on behalf of submitter)

04/11/2023  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

Shane Haylock  
 172 Puhinui Road  
 Papatoetoe  
 Auckland 2104

Submission to NOR2 and NOR3 of the Airport to Botany Rapid Transit Designation

The points below could generally apply to any of the NORs but are particularly relevant for NOR2 and NOR3.

### **Lack of Real Consultation**

It seems that people most impacted by the proposal have been the least consulted over the proposal. i.e. landowners that will have property partly or fully taken.

Though this is a 5 year in the making proposal we were only really made aware of the extent of this and the impact to us as landowners late last year. Even then the proposal has changed from light rail to rapid buses.

There seems to be a lack of overall public awareness of the extent of the proposal and the impact it will have the communities surrounding it and the changes it will generate to the community. Even the local board, though AT have said they were engaged, seemed to be unaware of the full extent of the proposal. If the local board is so unaware, how is it expected that the general community are going to be.

The consultation that has been cited was very small, considering the size of the project there are large assumptions made that the response that were obtained from the limited public engagements is representative of the general views if the community. The makeup of the questions have the feel of being leading so that the desired outcome is obtained though I acknowledge that this may not of been the intent. If people are only given a part of a story, pitched in a way that only highlights the benefits of a proposal, asked questions in a specific way, you can almost guarantee you are going to get the result you are looking for. That is not real consultation, it is simply informing people of what is going to be done in a way that looks like you are engaging the community.

People neighbouring the proposed route but not being directly impacted land purchases were not even deemed important enough to consult or inform and they will be the ones left with the changes this will bring. Again this doesn't seem like community consultation.

The project, as stated, has had 5 years to put this proposal together, at, I would assume, a substantial cost, and yet when put to the council and opened for public submission, people, who are largely not professional people dealing with this sort of things day to day, have less than a month to read, digest and put together a submission, the minimum time that has to be given. The 1 month timeframe is the minimum that is required by law. This does not feel like real consultation.

### **Unfairness in the acquisition of the land.**

1. People are being told they are have no options but to sell in the future. They face being uprooted from their family homes and area they have chosen to live. It was even intimated

that this was largely ok as they live under a high noise area anyway and it is of low value housing stock so really this should be ok. No consideration or compensation is even seemed to be considered for the stress this causes people and the potential impact to their property prices this will cause.

2. For people having to give up their full properties the answer is that people need to negotiate with AT for a fair market value for their home and that is it. Evidence from people we know already effected in the same way here and in Pakuranga show that they need to fight to even get a mid range price. People's lives are being unended and it seems the AT response is to try and get the properties for the least amount. The responsibility seems to fall on the landowner. No consideration to the harm that that does to the people concerned, now, leading up to the project and while the process is being done.
3. Some peoples properties who have only part taken seem to be even more adversely harmed as it will make their long term use of their houses far more difficult. Perhaps the thought is that a bit of money for the land taken will mitigate the impact to their lives and even the ability to sell their houses in the future.
4. There is a general feel in reading through the documents that the impact on people has no more real value than the need to replant a few trees.

### Route selection

There seems to be selections already preferred as to the proposed possible routes and that the evaluation process was more a way to just evaluate already preferred options. i.e. the option to go down the Great South Road and straight down the road to the current bus and train station, therefore avoiding the disruption through the city centre was discounted early and then not put into the further overall evaluation.

There has been a lot of criteria with impact scorings, which is both a good and useful method of evaluating competing ideas, but it becomes of little value if every criteria is of the same weighted value. I am not sure how this is even possible. There seems to be no weighting against the criteria and no final overall scores to see how the final selections were made. I could not find anywhere that listed the weightings.

There appears to be predetermined wants that seem to contradict with other statements. It is stated that people are willing to walk larger distances to train stations, and it is assumed therefore rapid transit bus terminals, than they are willing to walk to a bus stops. Cited as 1.2 kms. And yet it is stated that a terminal is necessary at the intersection of Lambie and Puhinui to pick up 'all' the people in potential high density housing. No options for very regular bus links to a station at Manukau, and if people are genuinely supposed to be happy to walk 1.2 kms then why not walk to Puhinui Station or Manukau station. Again it seems like the terminal adjacent to Westfield shopping center is not necessary but is there to placate some desire from the shopping centre.

Even the high density housing listed in maps does not match to published council ones so the need for a extra station at the corner of Lambie and Puhinui seems to be build on incorrect assumptions.

There is no indication that any evaluation has been properly undertaken to look at routes that do not go through already established residential area. i.e

Replace the existing rail corridor from Manukau Station to Puhinui with the rapid transit link instead.

Running back along that corridor from Puhinui station and down along the motorway and through the new commercial areas.

There is not as yet a solution to widening the bridge across the estuary at the end of the route. So if not you will just have a bottleneck.

The reason for these above comments, though they are outside our NOR3 area, is because they impact the route through our area.

### **Real benefits vs cost**

As Auckland and Papatoetoe residents we acknowledge the need for better public transport than what is currently available in Auckland. I often take the train to/from Ellerslie station in the morning and evening from/to Puhinui stations. It is quite convenient as I am so close to the station at both ends. Though it seems to be very underutilised except for a few peak hours during the day. Also we have used the Airport bus to get from the Airport to home, as it stops outside our house. From my home office I see the buses often, with hardly any passengers.

It is stated that this new RT will provide for people wanting to get to substantial employment areas, the only ones being stated is the Airport and the new commercial areas growing between the Airport and South western motorway are stated as not being substantial. Perhaps that is because of the new road bridge going across from McLaughlins Road will mean most people will take cars. Certainly most of the peak traffic I see going home from the Airport to the motorway twice a week when I go running is turning right, not going down Puhinui Road so it does not seem it is coming from the East.

Perhaps the team has access to precise predictive modelling that indicates growing use the coming decades but there is no data that can be seen on expected numbers and expected travel times during what times of the day, the improvement this will make on alternatives (as there are no direct buses currently exclusively taking the same route) to even measure the expected gains. I work in data modelling as a job, so I would be interested in seeing the predictive models that are being used to show the real need for this expensive RT infrastructure build.

Apart from a dedicated bike lane there is no real local community benefit from this apart from quick travel to the Airport which for Puhinui residents is already the case and could possibly be the case for Botany residents if there was at least a current dedicated bus route.

There is no guarantees of nicely landscaped wide walking areas along the route, if fact it is stated that the excess land will potentially sold off for high density housing or commercial use.

Residents that are bordering this are going to have added traffic and noise, potential loss of some land and will not even have the ability to have their whole properties purchased.

With no off street parking for the shops across the road on the northern side of Puhinui their businesses will be unlikely to survive and so there will be a loss of those amenities that are often used by locals on both sides of the road.

### **Recommendations**

My overriding recommendation is that the designation as a whole is put on hold until the issues raised are addressed and that there are better outcomes.



# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mr Mark Elder

### Organisation Name (if submission is made on behalf of Organisation)

Puhinui School

### Address for service of Submitter

116 Puhinui Road  
Papatoetoe, AUCKLAND 2104

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

<b>By:</b> Name of Requiring Authority	<u>Auckland Transport</u>
<b>For:</b> A new designation or alteration to an existing designation	<u>Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange</u>

### The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

Traffic and safety issues related to our school & community.

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### My submission is:

I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
 I or we are neutral to the Notice of Requirement

### The reasons for my views are:

On the attached PDF.

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(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

On the attached PDF.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

M Elder  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

04/11/2023  
Date

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- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

RE: Notice of Requirement 3;

Dear Sir/Madam

I write to you on behalf of the Puhinui School Board (Education institution no: 1448).

The position of the Board is one of "Neutral" in relation to the Notice.

The school address is not listed on Form 18, we are operating under the assumption that there will be no impact to the school property directly.

While the school is not physically located in the NoR 3 zone, our school zone does include part of this NoR zone.

We do, however, have the following concerns related to the school.

- (i) During construction of the transport project: for the safety of the pupils that attend the school and their families. This is since the school is on Puhinui Road, and this road is used by many of the students and their families to access the school gates. While there is a driveway and entranceway that can be used from Grayson Ave, this is still primarily accessed from Puhinui Road. This has the potential to make it unsafe for families either walking or driving to school.
- (ii) We are concerned about right turning into Grayson Ave from Puhinui Rd. This will potentially become more difficult for parents. We have also heard that you will only be able to turn left from Grayson to Puhinui. This will restrict traffic to/from our drop off zone. As well, with the proposed bridge connecting Puhinui Rd, so that the rapid transport is not held up, we are unclear on the impact that this will have on our children.
- (iii) Once the project is complete, young children especially, will have multiple long bendy buses initially and potentially trams or other light rail vehicles going past both at drop off and pick up time not only at school, but also on the way to school.
- (iv) One of our school trustees has heard from the local member of parliament, Arena Williams MP that once this project is complete any surplus or spare land could be used in any way that is deemed to be related to this project, for example to build multiple flats or other housing units. This is despite it appearing on the surface of being not related to the transit project directly. If this were to occur, it could have an impact on the school and planning.
- (v) In relation to private developments, any housing within 800 metres of key transit corridors can be up to six stories high by right. This will cover a large amount of the school zone on either side of Puhinui Road and side streets. Parents have also mentioned to us that they have heard that there are indications that over time housing on the southern side may slowly give way to commercial types of property, given the reduction in housing property for this project. This will put potentially many residential sections for the school community on the opposite side of Puhinui Rd, requiring additional traffic safety measures like railing and speed reduction zones to ensure the students wellbeing.
- (vi) We continue to have concerns about the parking options available for parents. This is already an ongoing concern for us and with a busier road, with more vehicles and increased roll growth this would be a significant concern. We would like the opportunity to work on a strategy for how this could look for our community.

The school would like the opportunity to speak to the hearing.

Kind Regards,

Mark Elder  
Principal.

Simon Kent  
Chair/Presiding member.

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mr Rajesh Kumar Sachdeva & Sunita Sachdeva & Ripul Sachdeva

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

26a and 1/26 Cambridge Terrace, Puhinui

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

<b>By:</b> Name of Requiring Authority	Auckland Transport
<b>For:</b> A new designation or alteration to an existing designation	Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

### The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

### My submission is:

- I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
 I or we are neutral to the Notice of Requirement

### The reasons for my views are:

My Cambridge TC is my first property bought in NZ and it was my Family house where my grand father I strongly oppose the project across my property and will take the route of Environment Court and High court in order to save the heritage part of my property.  
 If AT is open to negotiating the side yard of my property (say 2 or 3m), I am happy to sit down on the

table and negotiate but i strongly oppose the current project. Given the Blue marked area around Bridge St/Kenderdine Rd is not taken into consideration, i believe my part of the property can easily be taken down from the designated area of the map too. I strongly discourage any property intake from the designation and request Hearing Commissioners to take my personal circumstances into consideration when making decision.

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

I request Cambridge Terrace part of my property is excluded from the proposal as it will not be significant AC or NZTA benefit.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

11 April 2023

Signature of Submitter

Date

(or person authorised to sign on behalf of submitter)

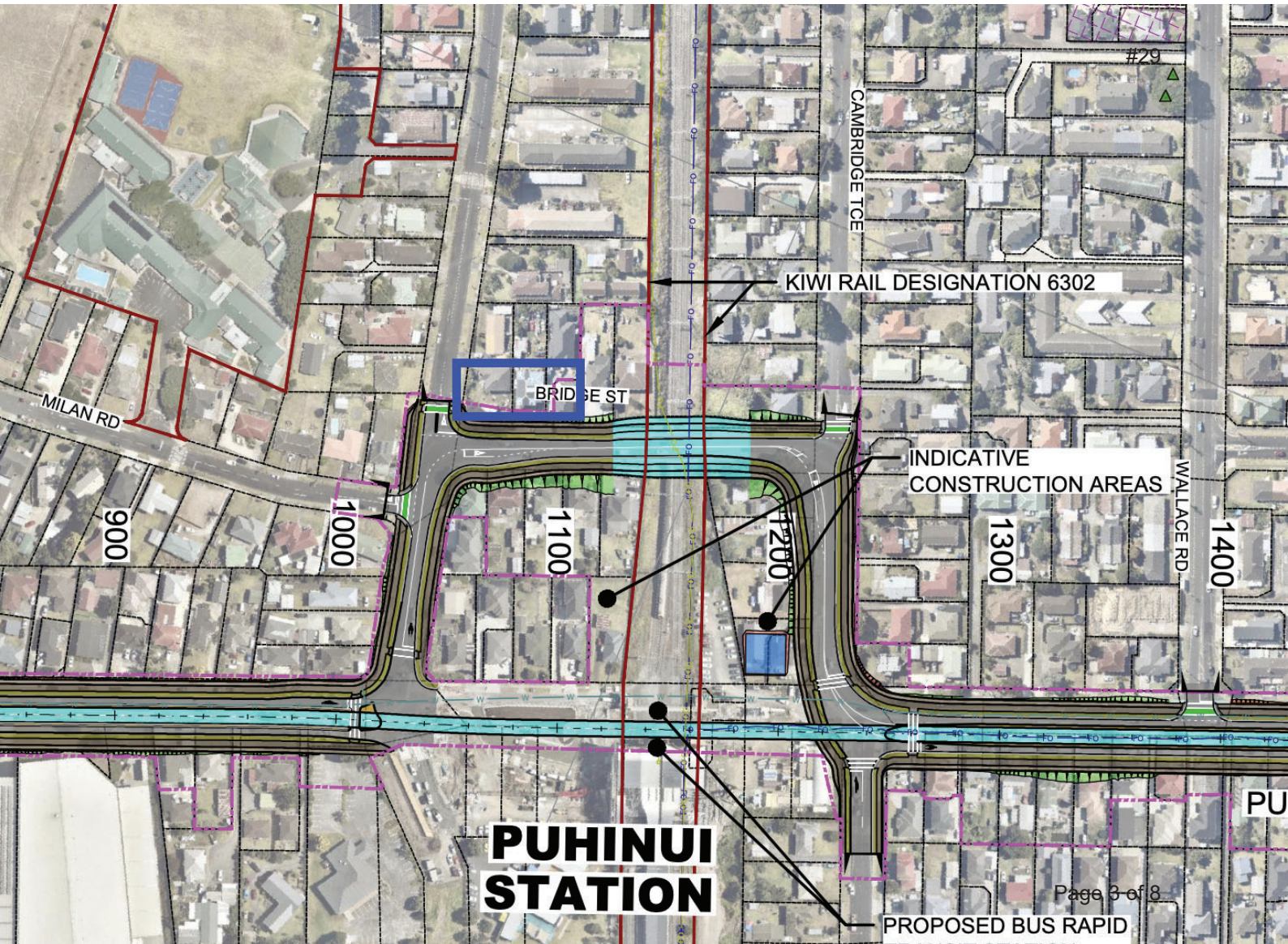
**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:501] Notice of Requirement online submission - Rajesh Sachdeva Sunita Sachdeva and Ripul Sachdeva  
**Date:** Tuesday, 11 April 2023 10:45:33 pm  
**Attachments:** [Puhinui Form 21.pdf](#)

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Rajesh Sachdeva Sunita Sachdeva and Ripul Sachdeva

Organisation name:

Full name of your agent:

Email address: bkGroup26ct@gmail.com

Contact phone number: 0210313200

Postal address:

54 bayvista Dr  
Karaka  
Auckland 2113

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:  
As per Form 21 PDF attached below.

I or we seek the following recommendation or decision from Auckland Council:  
As per Form 21 PDF attached below.

Submission date: 11 April 2023

Supporting documents  
Puhinui Form 21.pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of

requirement as soon as reasonably practicable after submitting to Auckland Council.



# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mr Rajesh Kumar Sachdeva & Sunita Sachdeva & Ripul Sachdeva

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

26a and 1/26 Cambridge Terrace, Puhinui

Telephone:

0210313200

Fax/Email:

bkGroup26ct@gmail.com

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

### The specific parts of the above notice of requirement that my submission relates to are: (give details):

### My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

### The reasons for my views are:

My Cambridge TC is my first property bought in NZ and it was my Family house where my grand father

I strongly oppose the project across my property and will take the route of Environment Court and

High court in order to save the heritage part of my property.

If AT is open to negotiating the side yard of my property (say 2 or 3m), I am happy to sit down on the

table and negotiate but i strongly oppose the current project. Given the Blue marked area around Bridge St/Kenderdine Rd is not taken into consideration, i believe my part of the property can easily be taken down from the designated area of the map too. I strongly discourage any property intake from the designation and request Hearing Commissioners to take my personal circumstances into consideration when making decision.

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

I request Cambridge Terrace part of my property is excluded from the proposal as it will not be significant AC or NZTA benefit.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

11 April 2023

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

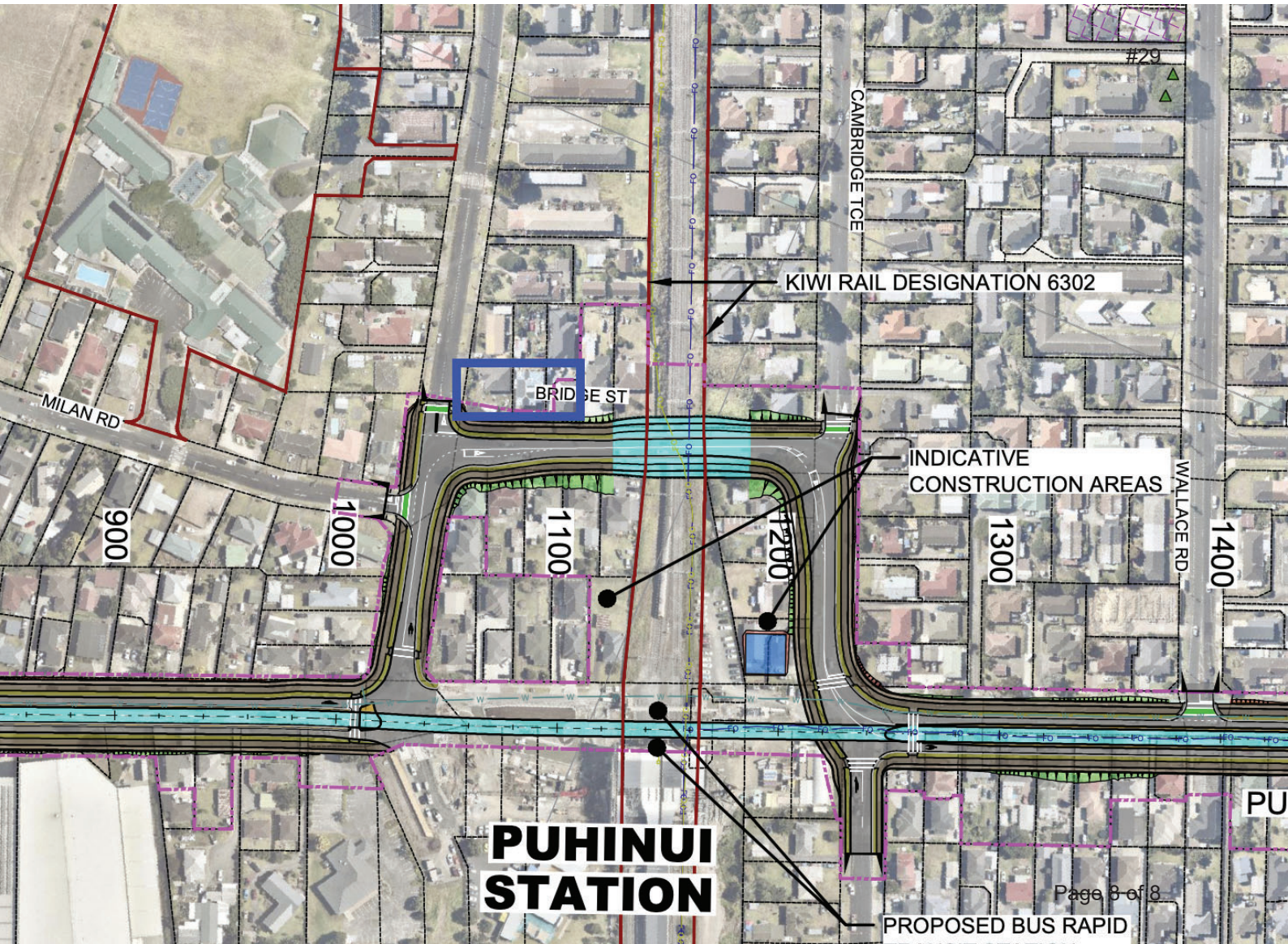
**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:498] Notice of Requirement online submission - Abhisekh Mohanlal  
**Date:** Tuesday, 11 April 2023 10:45:11 pm

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The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Abhisekh Mohanlal

Organisation name:

Full name of your agent:

Email address: abhisekh.mohanlal@gmail.com

Contact phone number:

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the puhinui road means a loss of land in the front of or family owned property which would have be useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road,in the recent years has alot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal.Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend AT to have a look at other options with the current road system. This could be making roads one-way, increasing the number of traffic signals for better flow of vehicles. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 11 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



11 April 2023

File ref: AUP NOR 3

Planning Technician  
Auckland Council  
Private Bag 92300  
Auckland 1142

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Dear Sir/Madam

**SUBMISSION ON A REQUIREMENT FOR DESIGNATION OF LAND UNDER S.168(2) OF THE RESOURCE MANAGEMENT ACT 1991:**

**NOTICE OF REQUIREMENT FOR BUS RAPID TRANSIT - PUHINUI STATION (IN THE VICINITY OF PLUNKET AVENUE) TO SH20/20B INTERCHANGE (NOR 3), BY REQUIRING AUTHORITY: AUCKLAND TRANSPORT**

**To:** Auckland Council

**Name of submitter:** Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. HNZPT submission is on the Notice of Requirement for Designation (NoR 3) in the Auckland Unitary Plan (AUP) to provide for a Bus Rapid Transit corridor, walking, cycling facilities and associated infrastructure. Specifically, NoR 3 that is part of the overall Airport to Botany Bus Rapid Transit Project (BRT). Its purpose being for the construction, operation and maintenance of a BRT walking and cycling facilities and associated infrastructure through the upgrade to Puhinui Road between Plunket Avenue and SH20/20B interchange.
4. HNZPT acknowledges that the proposed BRT corridor is a significant infrastructure project for Auckland Transport and because it is within a predominantly urban environment there will be changes to the existing environment. It is also understood that there is the need to ensure the city has a transport network that can respond to the "diverse and changing needs" (AEE, page 115) of both the existing communities and future generations. HNZPT supports the purpose of planning for a well-functioning urban environment through the improvement of public transport access and enabling alternative transport facilities such as walking and cycling. HNZPT also supports the protection of the corridor through designation.
5. Nevertheless, of focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA). Historic heritage, being specifically identified as a national importance under Section 6(f) the RMA. The definition of historic heritage



under Part 2 of the RMA includes archaeology. Therefore, effects on built heritage and archaeology, in addition to effects on Mana Whenua must be taken into account by Council when assessing the effects of NoR 3.

6. HNZPT does not agree with the historic heritage assessment set out in section 9.12 of the AEE, that NoR 3 will not adversely affect the historic heritage, or that the loss of heritage values will be low.
7. **The specific parts of the Notice of Requirement that Heritage New Zealand's submission relates to are:**

Proposed designation boundary:

8. HNZPT has identified that the proposed designation extent actually incorporates part of the land forming New Zealand Heritage List / Rārangī Kōrero List No. 7351, Cambria Park Homestead at 250/252 Puhinui Road – a Category 2 historic place. The New Zealand Heritage List / Rārangī Kōrero is one of the most important historical information resources in Aotearoa New Zealand. The proposed designation extent also includes part of Auckland Council's Category A\* scheduling of the same site as historic heritage (Item 01469, Cambria House, Schedule 14.1, Auckland Unitary Plan).<sup>1</sup> In addition, the proposed designation extent encompasses land taken for road widening in c.1969, which although currently understood not to be formally included within the Listed or Scheduled land nevertheless forms an integral and important part of the historical garden curtilage of the nineteenth and early twentieth-century Cambria Park Homestead. This strip of land retains a Gardener's Cottage, plantings, and other garden elements. All of these elements, including those within the land taken for road widening in c.1969, also form part of a recognised archaeological site (R11/3217, Cambria Park Homestead and cottage).
9. Designation Plan (SGA-PA-036, Sheet 3 of 4, dated 29/11/2022) illustrates that proposed designation boundary for NoR 3 extending into the land that is Listed and Scheduled as the Cambria Park Homestead (Lot 8 DP 62302 & part Clendons Grant) at 250/252 Puhinui Road.
10. This extent of the proposed designation boundary is not identified in any of the technical assessment documents supporting NoR 3. The different technical reports and the AEE only refer to the land already contained within the unformed road reserve, identifying that the AUP scheduled extent for Cambria Park Homestead (scheduled as Cambria House) as not being impacted and remaining protected (e.g., Section 7.4.2, page 76, Landscape Effects Assessment). They, likewise, do not identify direct or indirect impacts on the Listed historic place.

Engagement:

11. Section 11 Engagement of the AEE sets out the overview of the partner, stakeholder and public engagement that has been undertaken in informing and development of the NoR 3 documents. This is of concern to HNZPT because of the extent of potential effect the proposed works within the designation corridor will have on known and potential historic heritage, and *there has been no previous engagement with HNZPT.*

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<sup>1</sup> The AUP scheduling provides the address as 250 Puhinui Road.



12. Therefore, as the Listed historic place is potentially impacted through proposed direct encroachment – as well as additional designation of directly adjoining and historically associated land (which contains features belonging to the same interconnected historical and archaeological homestead site) - HNZPT should have been consulted.

Mitigation of Effects:

13. HNZPT is concerned that while there have been both archaeological and built heritage assessment reports completed for the entire length of the Botany to the Auckland Airport (NoR 1 – 4b) the mitigation of the effect of the designation and future construction of the Bus Rapid Transit corridor, walking and cycling facilities on the known and potential historic heritage will not be managed until the Outline Plan of Works stage.
14. The framework of the proposed Historic Heritage Management Plan (HHMP) conflates matters relating to historic heritage under the RMA and archaeological requirements provided for under the HNZPTA 2014 with respect to archaeological monitoring, investigation, and reporting. This is an unnecessary duplication of HNZPTA archaeological processes, where the archaeological authority will have its own separate Archaeological Works Plan required to be adhered to under that process.

Existing Historic Heritage:

15. The archaeological and built heritage assessments note the importance of Cambria Park Homestead. However, in addition to not considering encroachment of the designation on the Listed historic place (and Scheduled historic heritage place), they likewise insufficiently identify or take into account the historical and other contributions of surviving features within the portion previously take for road widening to the overall significance of the Cambria Park Homestead landscape, and especially its garden. Rather, both assessments make the presumption that notable surviving features such as the Gardener's Cottage will simply be lost if required by the construction activities to enable the transit corridor (Section 9, Assessment of Built Heritage Effects, page 30). The Built Heritage Assessment, while concluding that the "greatest level of effect" generated within NoR 3 will be the removal or demolition of the former Gardener's Cottage, continues to justify this loss due to the existing compromised stated of the building because of a previous fire.
16. No assessment is provided with the application on the extent of damage (or otherwise) to built archaeological fabric or the structural state of this building; or whether, as identified in the Landscaping and Urban Design evaluations there would be the potential to retain the structure through adaptive reuse as part of the heritage interpretation processes that will be generated through the establishment of the transit corridor. The importance of the cottage to the functioning, design and status of the Cambria Park Homestead garden have similarly not been identified or considered. Other garden elements, including surviving trees and other plantings, have likewise not been adequately identified or assessed. Insufficient assessment has been undertaken on potential in-ground archaeological components, whether pre-1900 or later archaeology within this area. The surviving Homestead building was originally erected in 1879 and this building and all associated features form an identified archaeological site (R11/3217).
17. A historic heritage impact assessment is required to identify heritage values and effects of the proposal on those values and suitable mitigation, including potential adaptive re-use.





18. HNZPT does not consider the 2022 assessment under both the Sections B3 and B5, AUP: RPS and Section E26, AUP: DP of the historic heritage (built heritage and archaeology) directly or indirectly affected by NoR 3 adequately considered the effects to the known and potential historic heritage associated with Cambria Park Homestead (Theme: Historic Heritage, page 11, Appendix B: Assessment against relevant statutory documents, AEE).
19. A more fulsome historic heritage impact assessment of the effects to the heritage values within the proposed corridor for NoR 3 for both recorded and non-recorded features and elements is required to be provided, specifically but not limited to:
- Cambria Park Homestead and its garden plantings extent, the Gardener's Cottage, features, plantings, and potential in-ground archaeology as an integrated heritage landscape.
  - Memorial Plaque
  - Notable Trees
  - Identification of further historic heritage, including any remnants of a wider rural historic landscape that pre-dates modern urban activity.
20. **Heritage New Zealand Pouhere Taonga oppose to the Notice of Requirement (NoR 3).**
21. **The reasons for Heritage New Zealand's position are as follows:**
- Cambria Park Homestead and its garden extent, including the Gardner's Cottage, features, plantings, and potential in-ground archaeology as an integrated heritage landscape.
22. The Cambria Park Homestead Heritage New Zealand List/Rarangi Korero (entry # 7351) encompasses both the main building and associated gardens, these gardens being identified in the Listing as an important and integral part of the place. At the time of Listing in the 1990s, it was noted that 'the garden is well-known for its Camellias, planted in 1910, and its mature trees' which explicitly contributed to the place's aesthetic significance. The very front portion of the Homestead's garden (within the land taken for road widening in c.1969) is not conceptually or physically separated from the other garden areas surrounding the Homestead. The Gardener's Cottage and other elements within this portion may potentially increase the understanding and otherwise enhance heritage values associated with the Listed (and Scheduled) property. The existence of the Gardener's Cottage emphasises social history values that should be further assessed. Also contained within the Homestead's garden that should be further assessed before any further design work is undertaken, are garden features, associated planting and the potential associated in-ground archaeological material. These should be assessed against all relevant heritage criteria as part of an integrated historical and archaeological landscape.
23. Cambria Park Homestead along with its wider historic landscape has significant heritage values associated with early settlement of South Auckland. While the area has evolved from an early farming settlement to a fully urbanised area Cambria Homestead, including its garden, has remained a stable connection of the community to its early European development and evolving rural landscape. The 1879 homestead and its original extensive grounds (farm and gardens) have a layered history from a 'genteel residence' and farm to being part of a government requisition in 1943 to house US forces during WWII. Its notes the connection with WWII is identified in the NoR 3 documentation as the Cambria WWII Military Camp to the east of the Homestead.



24. As highlighted in paragraphs 8-11 above, HNZPT is concerned that the actual extent of the proposed designation corridor into the scheduled extent of the Homestead is not discussed in either the Archaeological or Built Heritage assessments nor the AEE.
25. HNZPT notes the Built Heritage report talks of indirect positive effects arising from the improvement to “environments for pedestrian and low-speed modes of transport” (page 14, Assessment of Built Heritage Effects); and that there can be a “greater appreciation of the amenity and aesthetic values” derived from built heritage, and the provision of interpretive signage at “opportune public locations” (page 14).
26. Both the Landscape Effects Assessment and the Urban Design Evaluation identify Cambria Park Homestead, the Gardener’s Cottage and the associated gardens as a site that needs to be utilised within the designation.
27. The AEE does not discuss these options to utilise the existing heritage fabric and incorporate the site’s physical features into the corridor design. HNZPT considers the objectives and policies under the AUP RPS and the AUP OD to protect historic heritage have therefore not been adequately addressed.
28. Unlike the approach proposed for cultural values Section 2, AEE), there is little focus on the importance of the Cambria Park Homestead, including its significant garden has not been fully considered to be incorporated into the design stage of the project. The potential for retention or incorporation of either the Gardener’s Cottage or full existing garden plantings as part of the final transit corridor needs to be assessed. HNZPT agrees with the Landscape report that the site provides a level of amenity “contributing to historical connections and sense of place to the local area” (Landscape Effects Report, page 69); and that the site, as stated in the Urban Design Response “should be identified, developed and integrated with the adjacent land use functions and future design response” (Outcomes and Opportunities Plan, Section 7, Urban Design Evaluation).
29. Therefore, further assessment of Cambria Park Homestead and its wider historic extent is required; along with how these historic features could be accommodated into the design of the transit corridor to enable adaptation, interpretation, and landscaping instead of the mitigation automatically being the removal and replacement with new landscaping and where possible interpretation.

#### Memorial Plaque, Notable Trees and further Historic Heritage Identification

30. HNZPT considers a fuller analysis of all known and potential historic heritage features, including any remnants of a wider rural historic landscape that pre-dates modern urban activity, should be undertaken at this formative period before the specific design stage commences to avoid further loss of the area’s heritage fabric within the designation boundary.

#### Historic Heritage Management Plan (HHMP)

31. The consideration, management, and mitigation of effects from the purpose of the designation on known or potential Historic Heritage should be addressed through the NoR process instead of being deferred to the Outline Plan process.



32. The HHMP duplicates HNZPTA processes, such as an Archaeological Authority that will be required to be obtained before construction; and that should be included at the Outline Plan stage.
33. The protection of historic heritage, and the remedy and mitigation of “any residual” effects are more appropriately addressed through the existing NoR process.
34. Reliance on the Accidental Discovery Protocol with respect to archaeological sites is inappropriate as there is already assessment of the designation corridor that there is the potential for sub-surface archaeology and the need for an Archaeological Authority to be obtained under the HNZPTA 2014. Noting that the Accidental Discovery Standards E11.6.1 and E12.6.1 as set out in the Auckland Unitary Plan (Operative in Part) apply where an Archaeological Authority from HNZPT is not otherwise in place.
35. **Heritage New Zealand seeks the following decision from Council:**
36. A more fulsome historic heritage impact assessment (built and archaeological) to determine the full extent of the historic heritage and associated values within the proposed designation be completed before design work commences.
37. The effects of the development of the designation corridor will have on the heritage values within the proposed corridor for NoR 3 for both recorded and non-recorded features and places is required to be provided, specifically but not limited to:
  - Cambria Park Homestead and its garden setting extent, Gardener’s Cottage, and the associated wider heritage landscape.
  - Memorial Plaque
  - Notable Trees
  - Identification of further historic heritage
38. The provision of suitable mitigation, including potential adaptive re-use for historic heritage within NoR 3.
39. Further assessment is undertaken of how existing historic features, such as the Gardener’s Cottage and garden planting could be accommodated into the design of the proposed designation corridor to enable adaptation, interpretation, and landscaping to avoid removal and replacement with new landscaping and where possible interpretation.
40. The objective of the HHMP is rewritten to remove all duplication of processes with the HNZPTA.
41. The purpose of the HHMP should be focussed on the provision details such as:
  - Roles, responsibilities and contact details of the project personnel, Requiring Authority’s representative, Mana Whenua and HNZPT while are involved with heritage and archaeological matters.
  - Provision for access for Mana Whenua to carry out tikanga and cultural protocols.
  - Methods for protecting or minimising adverse effects on heritage and archaeological sites within the designation during works (for example fencing to protect form construction works).



- Advice that the Accidental Discovery Standards E11.6.1 and E12.6.1 as set out in the Auckland Unitary Plan (Operative in part) shall apply when an archaeological Authority from HNZPT is not otherwise in place.
- Methods for interpretation and appropriate public dissemination of knowledge gained from heritage investigations.

42. **Heritage New Zealand wishes to be heard in support of our submission.**

43. **If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

Yours sincerely

*BHParslow*

pp for Sherry Reynolds  
Director Northern Region

Address for service: Alice Morris  
[amorris@heritage.org.nz](mailto:amorris@heritage.org.nz)  
PO Box 105 291  
Auckland City 1143

# SUBMISSION ON NOTICE OF REQUIREMENT 2 and 3 (Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue) and Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange) (Auckland Transport)

---

To: Auckland Council  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: Quadrant Properties Ltd

**Quadrant Properties Ltd** provides this submission on Notice of Requirements – Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue) (“**NOR 2**”) and Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (“**NOR 3**”) to the Auckland Unitary Plan (“**the NOR’s**”).

The purpose of the NOR’s as summarised within the Assessment of Environmental Effects (‘**AAE**’) submitted with the application is for the “*Construction, operation and maintenance of a BRT corridor and walking and cycling facilities*”<sup>1</sup>. NOR 2 comprises a proposed designation of approximately 6.4 km long from Rongomai Park to Plunket Avenue on Puhinui Road. NOR 3 comprises a proposed designation extent of approximately 1.9 km long from Plunket Avenue to the SH20/20B interchange<sup>2</sup>.

The submitter is the property manager of five properties along the NOR’s alignment, all of which are owned by Lewis Holdings Ltd whom would be directly affected by the proposal, including required land acquisition. These properties include:

1. 285 Puhinui Road
2. 305 Puhinui Road
3. 307 Puhinui Road
4. 7 Ronwood Ave
5. 9 Ronwood Ave

---

<sup>1</sup> Section 7.6 of the Assessment of Environmental Effects

<sup>2</sup> Section 7.6 of the Assessment of Environmental Effects

**The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.**

The submission relates to the designation corridor, extent of physical works, and conditions.

The Submitter **opposes** the application for the NOR subject to the following relief sought.

**The reasons for the submitter's opposition are:**

1. The timeframe provided to review and provide submissions is insufficient and unreasonable given the size, scale, and implications of the proposal. The submitter was made aware of the consultation period beginning by way of a letter dated 10 March 2023, being the date the NOR's were notified. However, the submitter only received this letter on 20 March 2023, giving only 14 working days with which to review and submit on the proposed designation.
2. The information provided with the application lacks clarity and detail, particularly as it relates to the width of the proposed designation, interface with and implications for adjoining properties.
3. The submitter is concerned that the Requiring Authority is designating more land than required. Large parts of the Submitters properties are proposed to be designated; however, this does not appear to be required for the proposed physical works themselves. Given the designation is proposed to be in place for 15 years, and given the boundaries are likely to impact existing and future development along the Project alignment for some time, the submitter considers that designating this extent of land would compromise urban development and is not an efficient nor effective use of land.
4. As proposed, the NOR's would enable the Requiring Authority to increase in the level of flooding toward adjoining properties. The submitter considers that flooding effects should be managed within the NOR boundary, and not worsened as it relates to neighbouring properties.
5. The NOR's would not promote the sustainable management of natural and physical resources, in accordance with Part 2 of the Resource Management Act 1991 ("the Act");
6. The NOR's will, as a result, adverse impact the ability of the submitter to provide for their social, economic, and cultural wellbeing.

**Relief sought**

The Submitter seeks the following decision from Auckland Council in respect of the NOR's:

- That the designation boundaries are amended so that there is no encroachment of the Submitters property boundaries including by physical infrastructure, and all physical infrastructure including but not limited to- bus ways, traffic lanes, cycle lanes, foot paths, berms, are contained within the existing road corridor;
- If unavoidable, that any earthworks and battering extents beyond the existing property boundary are to be designed in consultation with the relevant property owners to minimise any impact to private land, and maintain the same utility of the said land;
- That the designation boundaries are amended to align with the above;

- That a condition is included to require the Requiring Authority to ensure that the Project does not worsen any flooding effects onto neighbouring properties.
- Such other consequential amendments to the provisions of the NOR's as may be necessary to give effect to the relief sought in this submission.

**The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.**



Michael Campbell  
Campbell Brown Planning Limited  
For and on behalf of Quadrant Properties Limited as its duly authorised agent.

11 April 2023

**Address for service of submitter:**

C/- Campbell Brown Planning Limited  
PO Box 147001  
Ponsonby  
**AUCKLAND 1144**

**Attention:** Michael Campbell  
  
**Telephone:** (09) 394 1694  
**Mobile:** 021845327  
**Email:** michael@campbellbrown.co.nz



6 April 2023

Auckland Council Unitary Plan  
 Private Bag 92300  
 Auckland, 1142  
 By email [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

## Airport to Botany Transit project

I am in favour of improved public transport links in South Auckland that provide affordable and accessible options for local communities and residents. South Auckland needs modern and wide arterial routes, but to make those sustainable and usable for locals, communities need to be heard and involved in decision making.

In this regard, I am writing this submission on the proposed public works in Papatoetoe as part of the Airport to Botany Rapid Bus Transit project ('the project').

The official reference is "Notice of Requirement 2: Bus Rapid Transit - Rongomai Park to Puhinui Station in the vicinity of Plunket Avenue" and "Notice of Requirement 3: Bus Rapid Transit – Puhinui Station in the vicinity of Plunket Avenue to SH20/20B Interchange".

## Households impacted by the project

I understand approximately 300 households in the Manurewa electorate are impacted by Notices of Requirement 2 and 3 in this project. Attached is the map of affected households.

These households are part of a long-standing, close-knit community. Many residents in this area have been living in their homes for decades, and some households are multi-generational. The community has faced significant challenges together, including the 2021 tornado that resulted in the loss of one life and left 63 homes uninhabitable. The community is relatively poorer and slightly older than the average across the electorate. There is also a growing migrant and refugee population that have made this community their home. Several kura are also in the impacted area, including Puhinui School on Puhinui Road.

## My role in the process

As the local MP, I see it as my role to make sure my constituents can have their say on local issues which affect them. In this regard, I have hosted three community meetings on this specific topic in the past six months, in addition to door-knocking, phone calls and email correspondence with individual constituents.





### Feedback from three community meetings

On 21 October 2022, at a meeting I hosted outside Puhinui station attended by 40 residents, it was emphasized by residents that the disruption was more than just a financial cost to property prices. The view was that the proposed works had created immediate uncertainty and concern that it would change the character of the entire neighbourhood.

On 25 October 2022, at the request of residents, I wrote to Te Tupu Ngatahi/Supporting Growth, C/- Auckland Transport, conveying resident's requests for (a) a community meeting with transport planners, (b) publication by Te Tupu Ngatahi of a map showing affected houses on Puhinui Road, and (c) information about the preferred route, alternatives considered, and analysis on the impact on the community.

On 30 November 2022, I hosted a community meeting with representatives of Auckland Transport. I thank Auckland Transport for attending, which was also appreciated by residents. Nevertheless, while a community meeting was held and a map of affected properties was shown to residents who were present, residents expressed concern there was no public distribution of this map, nor was information made available about how the preferred route was determined, what alternatives were considered, and whether this analysis took into account the disruption to the Papatoetoe community.

On 24 March 2023, I organized a gathering of key community leaders to hear their concerns about the submission process following the Notice of Requirement. I reached out to the Friends of Submitter service that was advertised, asking their representatives to attend the meeting, but the invitation was declined. I was told that the service was only available by email and phone.

While residents do want better public transport and arterial routes in South Auckland, they have specific concerns about this project, including:

### Lack of information sharing with community

Despite some efforts, residents expressed concern about the lack of information sharing with the community.

In mid-2022, some residents received letters informing them that the draft designation boundaries of the project may affect their properties, and that the designation process would likely happen by the end of 2022. For many residents this was the first time they had heard of the project and the impact on their properties and community.



Despite some information available at the community meeting in November 2022, and some official information online from December 2022, the first opportunity for most residents to see details was when households received the Notice of Requirement on 10 March 2023, which explained the impact on individual properties.

### **No opportunity to input into the drafting process**

Residents wanted to be included in the planning process before designation boundaries were made.

Residents noted that there was no consultation process to propose alternative routes. Once decided, there was also no opportunity to suggest modifications to draft designation boundaries to take into account local concerns, such as safe pedestrian access for students at schools and kura around Puhinui Road, or the continued need for private carparking for residents and public carparking for local business.

### **Lack of support for submission process**

During the part of the process which related to the Notice of Requirement, the approach of pursuing only formal written communication to each household left individual residents in the community feeling isolated and unsupported in the process.

Many residents raised with me their confusion about the complex technical language in the Notice, and the numerous large files attached to the Notice which were only available online. Not all households have access to high-speed internet and some residents have difficulty communicating in English.

### **Lack of time for submission process**

Residents noted that the deadline of 11 April 2023 set for submissions was too short. It was limited to only 20 working days, and that this timeline included the four-day Easter holiday and the start of school holidays.

Several residents noted that their non-office jobs and shift-work did not afford them the time during the week to read the documents or write a submission.

Many residents informed me that they would have wanted to make a submission but would not be able to by the deadline.





## Arena Williams

MP for Manurewa

[arena.williams@parliament.govt.nz](mailto:arena.williams@parliament.govt.nz)  
Freepost PO Box 18 888  
Parliament Buildings, Wellington 6160

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### Electorate Office

09 267 1180

---

[f](#) /ArenaWilliamsManurewa

[t](#) @arenaa

### 15-year extended lapse period

Residents also raised concern with the lack of consultation about the extended lapse period of 15 years that has been proposed. I understand under the Resource Management Act a designation lapses on the expiry of 5 years, unless a different period is specified. The project proposal states that "there is a need to designate the corridor from inappropriate development until funding is allocated, and therefore a lapse period of 15 years is required". For many residents this is the first time they had heard of this extended timeline.

The 15-year timeline also raises further questions why only 20-working days was provided for submissions on this complex project.

### Hearing

I do not wish to be heard, but I will attend a hearing to support residents who continue to wish to be heard in this process.

Kia ora

A handwritten signature in black ink, appearing to read "Arena Williams".

Arena Williams  
MP for Manurewa

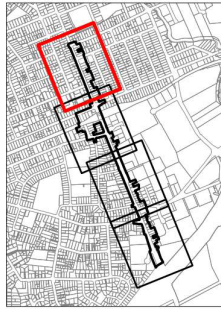


# Designation Plan

Land to be Designated  
Airport to Botany Rapid Transit Upgrade

## Legend

- Proposed Designation
- Parcel Boundary
- Property ID



This map contains data derived in part or wholly from sources other than those party to the Supporting Growth Alliance, and therefore, no warranty is made by the Supporting Growth Alliance as to the accuracy or completeness of this information.  
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Revision	Author	Verified	Approved	Date
1	RSB	RL	HR	20/10/2022

Client: Auckland Transport / Waka Kotahi

Discipline: GIS

Project: Airport to Botany Rapid Transit Upgrade

Drawing No: SGA-PA-035

Sheet No: 1 of 4

#33



New Zealand Government

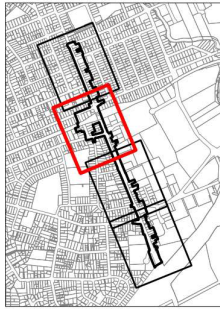


# Designation Plan

Land to be Designated  
Airport to Botany Rapid Transit Upgrade

**Legend**

- Proposed Designation
- Parcel Boundary
- Property ID



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Revision	Author	Verified	Approved	Date



Client: Auckland Transport / Waka Kotahi  
Discipline: GIS

Project: Airport to Botany Rapid Transit Upgrade  
Drawing No: SGA-PA-035  
Sheet No: 2 of 4

#33






New Zealand Government

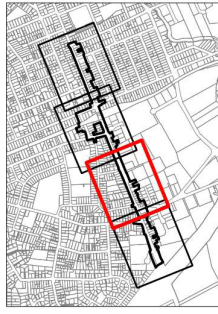


# Designation Plan

Land to be Designated  
Airport to Botany Rapid Transit Upgrade

**Legend**

-  Proposed Designation
-  Parcel Boundary
-  Property ID



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Revision	Author	Verified	Approved	Date



Client: Auckland Transport / Waka Kotahi  
Discipline: GIS

Project: Airport to Botany Rapid Transit Upgrade  
Drawing No: SGA-PA-05  
Sheet No: 3 of 4

#33



New Zealand Government

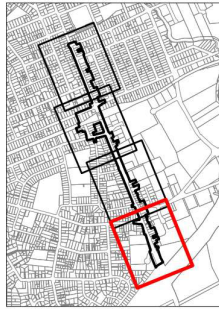


# Designation Plan

Land to be Designated  
Airport to Botany Rapid Transit Upgrade

**Legend**

- Proposed Designation
- Parcel Boundary
- Property ID



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Revision	Author	Verified	Approved	Date

Client: Auckland Transport / Waka Kotahi  
Discipline: GIS  
Drawing No: SGA-PA-035  
Sheet No: 4 of 4

**#33**



## Form 21

## Submission on requirements for designations

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** Aotearoa Towers Group (ATG)  
Private Bag 92161  
Auckland 1142

Chorus New Zealand Limited (Chorus)  
PO Box 632  
Wellington

Connexa Limited (Connexa)  
167 Victoria St West  
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)  
Private Bag 92161  
Auckland 1142

Spark New Zealand Trading Limited (Spark)  
Private Bag 92028  
Auckland 1010

Two Degrees Mobile Limited (2degrees)  
PO Box 8355  
Symonds Street  
Auckland 1150

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the **Telecommunications Submitters**.



**The Proposal:**

This is a submission on the following notices of requirement by Waka Kotahi NZ Transport Agency and Auckland Transport for transport projects from Botany to Auckland International Airport:

- Alteration of Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport;
- Bus Rapid Transit – SH20/20B Interchange to Orrs Road (Auckland Transport)
- Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)
- Rongomai Park to Puhunui Station (in the vicinity of Plunket Avenue) (Auckland Transport)
- Bus Rapid Transit – Botany to Rongomai Park (Auckland Transport)

**The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.**

**The specific parts of the notice of requirement that this submission relates to are:**

The designations in their entirety, and in particular the conditions of the designations that relate to network utilities.

**The Telecommunications Submitters' submission is that:**

The Telecommunications Submitters have no position on the overall Botany to Auckland International Airport package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridor are adequately addressed. The Telecommunications Submitters oppose the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The companies collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also critical for supporting social and economic wellbeing and provides opportunities for work from home/remote work

solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy by supporting measures to reduce travel demand.

This equipment is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. Reasonable access for maintenance and access for emergency works at all times will need to be maintained. In addition, the design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable to trying to retrofit necessary telecommunications/broadband infrastructure later due to disruptions and/or incompatibility with project design.

### **Existing Infrastructure**

A summary of existing infrastructure located in the project footprints is as follows:

- Chorus fibre and copper lines.
- 8 mobile network sites operated by the various mobile network providers.

### **Future Infrastructure Requirements**

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit them at a later date. This process does not always run smoothly. To provide a recent example, Spark has had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage along that length of road. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting it has proved to be very challenging to try to retrofit necessary telecommunications infrastructure into the design of this project.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable, or to not preclude, the development of new network utility including telecommunications infrastructure where practicable to do so. There was

an associated obligation in that condition to report on opportunities considered and whether or not they had been incorporated into the design in the outline plan(s)<sup>1</sup>.

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, a provision to ensure the matter is properly considered during the design phase through consultation with network utility operators, which sets appropriate expectations and ensures these opportunities are properly explored, is reasonable. In the case of telecommunications, this enables proper consideration of making provision for communications that support the function of the road. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which is the focus of the current proposed conditions.

The Telecommunications Submitters seek an equivalent condition to that included in the W2W designation conditions to address this.

### **Consultation with Telecommunications Network Utility Operators**

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design. Whilst the notices of requirement have a Network Utility Management Plan (NUMP) condition, this does not specify who the relevant entities are to be consulted on development of that plan. The Assessment of Environmental Effects for each notice sets out the relevant utility providers who have assets within and around the proposed designations. This specifically includes Chorus (in regard to communications lines). However, the other companies party to this submission are not mentioned and therefore there is a concern they will not be consulted as part of the NUMP development for each stage.

Spark, One NZ and 2degrees operate mobile phone/wireless broadband networks which are often include facilities located in roads. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa, and similarly One NZ has sold its fixed mobile assets to ATG (which will rebrand in due course to FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition is proposed to provide more clarity on which telecommunications/broadband operators may be affected.

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<sup>1</sup> East West Link Condition NU2, W2W Condition 24A

**The Telecommunications Submitters seeks the following decision from the Requiring Authority:**

Amend the NUMP condition by adding an advice note for each notice of requirement as follows:

***Network Utility Management Plan (NUMP)***

- (a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.*
- (b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:
  - (i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;*
  - (ii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
  - (iii) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.**
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) (including Auckland International Airport Limited who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator (including Auckland International Airport Limited) in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator (including Auckland International Airport Limited) shall be considered when finalising the NUMP.*

- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator (including Auckland International Airport Limited) shall be prepared in consultation with that asset owner.

**Advice Note:**

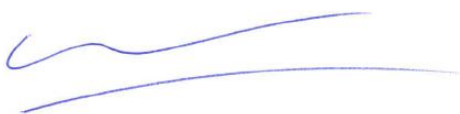
**For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group, Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited and Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).**

Add a new condition to each notice of requirement as follows:

**XX: The Requiring Authority shall consult with Network Utility Operators during the detailed design phase to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.**

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter  
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 5 April 2023

**Address for service of submitter:**

Chris Horne

Incite

PO Box 3082

Auckland

**Telephone:** 0274 794 980

**E-mail:** [chris@incite.co.nz](mailto:chris@incite.co.nz)

**SUBMISSION ON AUCKLAND TRANSPORT AND WAKA KOTAHI'S NOTICES OF  
REQUIREMENT FOR THE AIRPORT TO BOTANY BUS RAPID TRANSIT PROJECT BY  
KĀINGA ORA HOMES AND COMMUNITIES**

**TO:** Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1010

*Submission via email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)*

**KĀINGA ORA HOMES AND COMMUNITIES (Kāinga Ora)** at the address for service set out below makes the following submission on the Notices of Requirement (**NoR**) for the Airport to Botany Bus Rapid Transit Project (**The Project**) (Requiring Authority – Auckland Transport and Waka Kotahi).

### **Background**

1. Kāinga Ora was established in 2019 under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government's delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
  - (a) being a world class public housing landlord; and
  - (b) leading and co-ordinating urban development projects.
3. Kāinga Ora's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
  - (a) provide people with good quality, affordable housing choices that meet diverse needs; and

- (b) support good access to jobs, amenities and services; and
  - (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures. In addition to housing, Kāinga Ora has a key interest in critical infrastructure projects to enable housing supply, build-ready land and well-functioning urban environments. Therefore, its interest is across the urban development spectrum.
  5. The public housing portfolio managed by Kāinga Ora in Auckland comprises approximately 30,100 dwellings<sup>1</sup>. Auckland is a priority to reconfigure and grow Kāinga Ora housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
  6. Within Auckland, there are 7,494 applicants on the Ministry of Social Developments housing waitlist as of December 2022<sup>2</sup>, all requiring a range of housing sizes from 1-5+ bedrooms. Of these, 19% are located within the Manukau and Howick Ward's, these being the two wards directly affected by the Project. Combined these comprise approximately 3% of the total area of Auckland, within which there is almost one fifth of the social housing demand. There is high demand for new and existing social housing within the area.
  7. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora interests lie in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
  8. In addition to its role as a public housing provider, Kāinga Ora also has a significant role as a landowner, landlord, and developer of residential housing. Strong

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<sup>1</sup> As of December 2022; <https://kaingaora.govt.nz/publications/housing-statistics/>

<sup>2</sup> Ministry of Social Developments Housing Register December 2022



relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.

9. Kāinga Ora owns land within, adjacent and nearby to the proposed designation subject to this submission. Kāinga Ora has identified approximately 269 sites (comprising 483 units) which will be affected, these comprising:
  - a) 41 sites (50 units) of which are proposed to be fully acquired;
  - b) 48 sites (comprising 160 units) of which are proposed to be partially acquired;
  - c) A further 115 sites (comprising 158 units) are located within 50m of the proposed designation boundaries and 65 sites (comprising 115 units) are located within 50-100m of the proposed designation boundaries, being within the 100m assessment extent and considered a '*Protected Premises and Facility*' (**PPF**) within an urban area<sup>33</sup>; and
  - d) There are approx. 1,230 Kāinga Ora units located within a 1,200m walkable catchment from the 9 proposed rapid transit stops (**RTS**), representing nearly 10% of the total number of dwellings within these walkable catchments, which will positively support and contribute to the patronage of the Bus Rapid Transit (**BRT**) service. In particular, a majority of these Kāinga Ora units (approx. 83.5%) are located between the Ormiston Road and Diorella Drive section of the Project. Kāinga Ora therefore has an interest in ensuring that its tenants' access and connectivity to the RTS are maximised.
10. Tenancies within Kāinga Ora's housing portfolio within the Local Board areas impacted by the Project are very stable, with the current occupancy rate sitting at approximately 99.79%, and the average tenancy length being 11 years. Of those properties proposed to be acquired by the Project, the average tenancy length is 13 years. Most households (comprising a mixture of housing compositions and ages) wish to remain in the area because of their existing connections and close-knit community and for their children to stay within the same school and avoid the disruption of being relocated.
11. Policy decisions made at both central and local government level have impacts on housing affordability and community wellbeing. The challenge of providing affordable housing will require close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land

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<sup>33</sup> NZS6806

supply constraints, infrastructure provisions and capacity as well as an improved urban environment.

12. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing, as well as the well-being of their tenants. This includes the provision of services and infrastructure, and how this may impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (CGH) suppliers.

### **Wider Context**

13. In addition to the above, Kāinga Ora will play a greater role in urban development in New Zealand. The legislative functions of Kāinga Ora, as outlined in the Kāinga Ora Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:
  - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
  - b) providing a leadership or coordination role more generally.
14. Notably, the statutory functions of Kāinga Ora in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first time buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

### *The Government Policy Statement on Housing and Urban Development 2021 ("GPS-HUD")*

15. The GPS-HUD sets a direction for housing and urban development in New Zealand. Its overarching vision is that everyone in New Zealand lives in a home and a community that meets their needs and aspirations. The four main things it sets out to achieve are:
  - (a) **Thriving and resilient communities** – the places where people live are accessible and connected to employment, education, social and cultural opportunities. They grow and change well within environmental limits, support our culture and heritage and are resilient.

- (b) **Wellbeing through housing** – everyone lives in a home, whether it's rented or owned, that is warm, dry, safe, stable and affordable, with access to the support they need to live healthy, successful lives.
- (c) **Māori housing through partnership** – Māori and the Crown work together in partnership so all whānau have safe, healthy, affordable and stable homes. Māori housing solutions are led by Māori and are delivered locally. Māori can use their own assets and whenua Māori to invest in and support housing solutions.
- (d) **An adaptive and responsive system** – Land-use change, infrastructure and housing supply is responsive to demand, well planned and well regulated.

*The National Policy Statement on Urban Development (“NPS-UD”) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the “RMAA 2021”)*

- 16. The NPS-UD aims to ensure councils better plan for growth and remove overly restrictive barriers to development to allow growth in locations that have good access to services, public transport networks and infrastructure. The NPS-UD's intensification policies require councils to enable greater heights and densities in areas that are well-suited to growth, such as in and around urban centres and (existing and proposed) rapid transit stops. The RMAA 2021 introduced the Intensification Streamlined Planning Process for tier 1 councils to implement the intensification policies and additionally required these councils to introduce the Medium Density Residential Standards.
- 17. Together, the NPS-UD and RMAA 2021 are intended to ensure New Zealand's towns and cities are well-functioning urban environments that support housing supply and affordability, accessibility to jobs and services, and emissions reduction.

### Scope of Submission

18. The submission relates to the five NoR's for the Airport to Botany Bus Rapid Transit Project in their entirety.

### The Submission is:

19. Kāinga Ora **supports** the Project and **supports** the NoR's for the Project **in part**, which seeks to undertaken the following works to provide to provide a BRT Corridor and associated walking and cycling facilities<sup>4</sup>:
- (a) Widen the existing Te Irirangi Drive between Botany Town Centre and Rongomai Park (**NoR 1**);
  - (b) Widen numerous roads between Rongomai Park and Plunket Avenue (**NoR 2**);
  - (c) Widen the existing Puhinui Road reserve between Plunket Avenue and the Stage Highway (**SH**) 20/20B interchange, the provision of a BRT bridge to Puhinui Station, and associated widening of streets around Puhinui Station (**NoR 3**);
  - (d) Extension of Puhinui Road Reserve between SH20/20B interchange and Orrs Road (**NoR 4a**); and
  - (e) Widening of SH 20B corridor between SH20/20B and Manukau Memorial Gardens (an alteration to existing designation 6717) (**NoR 4b**)
20. This support is subject to the relief Kāinga Ora seeks being granted and matters raised in its submission being addressed.
21. In particular, but without limiting the generality of the above:
- a) Kāinga Ora supports the outcomes derived from the project particularly as they relate to the delivery of regionally significant transportation infrastructure, enhanced accessibility, and the overall improved rapid transport, walking and cycling provision, however support in part the proposed NoR for the Project. Kāinga Ora considers that the Project will support urban growth and intensification objectives along its alignment, contained within the strategic planning documents, including those within the NPS-UD.

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<sup>4</sup> Refer Section 1 of the AEE for specific details.

- a) Kāinga Ora considers the designation process is appropriate due to the regional significance of the infrastructure proposed and the ability of the designation process to avoid unreasonable delay.
  - b) Kāinga Ora generally supports the proposed conditions of the designation and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community, including but not limited to: the submission of an Outline Plan of Works (**OPW**), the Mana Whenua Partnership Forum (**MWPF**), Stakeholder Communication and Engagement Management Plan (**SCEMP**), Development Response Management Plan (**DRMP**), Urban Landscape Design Management Plan (**ULDMP**), Construction Environmental Management Plan (**CEMP**), Cultural Monitoring Plan (**CMP**), Construction Traffic Management Plan (**CTMP**), Construction Noise and Vibration Management Plan (**CNVMP**), Construction Noise and Vibration Management Schedule (**CNVMS**), Historic Heritage Management Plan (**HHMP**); Ecological Management Plan (**EMP**); Tree Management Plan (**TMP**), and a Network Utility Management Plan (**NUMP**).
22. Notwithstanding the general support of the Project, Kāinga Ora considers that further information or details about the project are required. Depending on the outcome of these investigations, there may need to be some changes to designation conditions and/or the design of the project to address the concerns expressed in this submission.

### **Kāinga Ora as a Key Stakeholder**

#### *Displacement of Kāinga Ora Tenants and Customers*

23. As discussed above, Kāinga Ora has a large land holding and associated high numbers of residents that will be affected by the Project, including four community group housing and a transitional housing facility. Kāinga Ora also has a large number of properties and residents within the wider catchment that would be served by the Project. Demand for housing is high within the Project area, and people wish to stay in the area. Kāinga Ora is concerned that the proposal will result in the displacement of at least 212 tenants from 61 Kāinga Ora dwellings which would be removed as a result of the Project. This equates to approximately 14.6% of Kāinga Ora customers and 12.6% of Kāinga Ora managed stock within 100m of the Project's designation

boundary, exacerbating the already significant issues associated of a lack of social housing, in an environment where demand is so high.

24. A number of the Kāinga Ora properties and the associated communities that will be affected by the Project are also subject to the Auckland Unitary Plan's Moderate Aircraft Noise Area Overlay (**MANA**). Kāinga Ora has submitted on the constraints of the MANA Overlay in Proposed Plan Change 78 (**PPC78**). However, the MANA Overlay currently provides for residential development at an average density of one dwelling per 400m<sup>2</sup> for properties located within the MANA. This presents additional significant challenges to Kāinga Ora when attempting to re-home residents in their communities whose dwellings have been acquired by the Project, and presents a potential increased social effect of displacement of these communities. Given the number of Kāinga Ora landholdings within the designation area, engagement with Kāinga Ora should begin at an early stage to address the effects of displacement on Kāinga Ora tenants as a result of the proposed property acquisition.

#### *Property Acquisition*

25. Kāinga Ora is concerned that the Requiring Authority is designating more land than they need to for the Project. It is noted that the designation boundaries are based on 'typical offsets' from similar projects. However, given the designation is proposed to be in place for 15 years, and given the boundaries are likely to impact future development along the Project alignment for some time (and may lead to unintended consequences as a result), Kāinga Ora requests that a more refined approach is adopted to determining the designation boundary. This would ensure that only the minimum amount of land required is designated (for both construction and operational needs), so that efficient and effective land use is not compromised. Kāinga Ora requests that they are involved, as a Key Stakeholder, in undertaking this refinement exercise as it relates to their portfolio.
26. In addition, Kāinga Ora proposes the incorporation of a periodic review condition where the extent of the designation boundary is reviewed every 12 months following the lodgement of OPW(s) to ensure this is being refined continually, and that any land no longer required for construction and operation as a result of the refinement exercise shall be uplifted from the designation.

### *Kāinga Ora as a Key Stakeholder*

27. Kāinga Ora considers that they are a key affected party, and support that they have been identified as a key stakeholder by the Requiring Authority. However, as a key stakeholder, and given the significant potential displacement impacts discussed above, Kāinga Ora requests that they are involved specifically in the preparation of management plans and future OPWs for the Project, and seek amendments to the conditions to reflect this. Notwithstanding this, Kāinga Ora considers that the Requiring Authority should be mitigating the effects of the designation now where possible.

### **Well-Functioning Urban Environment – Accessibility Improvements**

#### *NPS-UD and Proposed Plan Change 78*

28. The NPS-UD seeks to enable intensification within a walkable catchment of existing and planned RTS<sup>5</sup>, as well as enable building heights, densities and urban form in and town centres that are commensurate with the level of community activity with these centres. As well as this, amendments to the RMA require the incorporation of Medium Density Residential Housing Standards (**MDRS**) across all residential zones, with some exceptions.
29. PPC78 implements both the NPS-UD and MDRS. Submissions on PPC78 have closed, and hearings are beginning, however a decision has not yet been made. This has been acknowledged within the Assessment of Environmental Effects (**AEE**) for the Project when discussing the receiving environment<sup>6</sup>.
30. Irrespective of this, the NPS-UD signifies a clear directive to encourage an increase in building heights, development density and urban form not only within, but also around town centres, and existing and planned RTS such as those proposed by the Project. It is expected that this would require an increase in development capacity, height and form along the alignment of the Project, for both residential and commercial / business activities. Likewise, Kāinga Ora considers that providing for such increases in urban form and density are exactly what transport infrastructure projects such as the proposed NoR are seeking to facilitate.

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<sup>5</sup> NPSUD Policy 3(c)

<sup>6</sup> Refer section 7.5 of the Assessment of Environmental Effects

31. In light of the above, and while it is acknowledged that the Project makes significant improvements to cycling and bus infrastructure along the Projects alignment, Kāinga Ora considers that greater emphasis should be placed on the importance of quality Urban Design outcomes, including addressing issues of severance, and improving connectivity, levels of services, travel mode priority and amenity for pedestrians, cyclists and micro-mobility options. These issues are discussed below.

### *Severance*

32. Kāinga Ora acknowledges that the effects of severance already occur along parts of the proposed BRT corridor, particularly along Te Irirangi Drive due to the number of traffic lanes, number of vehicles, the resulting dominance of vehicles and the lack of mid-block crossing points.
33. In addition to this, the block pattern of adjoining land uses, particularly that to the east of Te Irirangi Drive (being made up of numerous cul-de-sacs and dead-end roads) is not very permeable with respects to accessibility for pedestrians or active modes of transport. Consequently, connectivity, particularly at a pedestrian scale, is already restricted in this area.
34. However, Kāinga Ora is concerned that the Project will increase this severance effect further and in turn reduce connectivity by increasing the corridor width and making it harder to cross due to the provision of the central bus lanes. Kāinga Ora is concerned that the Project will further extend this severance from Ormiston Road along towards the Manukau Town Centre and through to Puhinui Road.
35. This severance effect is acknowledged within the AEE, which states<sup>7</sup>:
- “There will be increased community severance as a result of the Project. This is particularly evident on Puhinui Road where the centre running BRT corridor will restrict the ability of pedestrians to cross the road.”*
36. Kāinga Ora is concerned that adequate mitigation of these severance effects has not been provided and that opportunities for improving the effects of severance have not been fully considered. For example, Kāinga Ora is of the view that there are opportunities for additional safe mid-block crossing facilities along the Projects alignment, as well as the potential for additional stations to be provided. Increasing the

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<sup>7</sup> Refer AEE Section 9.6.3



number of mid-block crossings and stations would facilitate increased patronage of the BRT service.

37. As an example, Kāinga Ora has a significant number of tenants between the catchment of Ormiston Road and Dawson Road Stations, where a large residential catchment is serviced and the distance between stations currently proposed is approximately 1,600m. Kāinga Ora considers that a similar opportunity exists at the intersection of Te Irirangi and Hollyford Drives and Boundary Road. Both locations comprise a residential catchment with a high density of Kāinga Ora owned properties that could take advantage of the BRT service. An additional station would be well utilised by these existing and/or future Kainga Ora tenants, which would in turn facilitate the use, and increase patronage of, the proposed BRT service given the density of customers it would serve.
38. Kāinga Ora requests that these aspects, are explored further in consultation with Kāinga Ora, with suitable changes made to the NoR.

#### *Travel Mode Priority*

39. Kāinga Ora acknowledges that the existing context, particularly the car dominated transport routes that currently make up the current road networks along the Protects alignment, provides significant challenges to achieving best practice urban design outcomes such as a high-quality and high-amenity pedestrian and cycling environment. Likewise, Kāinga Ora acknowledges that the proposal will result in improved provision for public transport, pedestrian and cycling accessibility when compared to the existing context.
40. However, Kāinga Ora considers that the Project provides a significant opportunity to better address these existing issues, and reconsider the arrangement of, and priority given to the various modes of travel. In particular, Kāinga Ora considers that prioritisation of travel modes for pedestrians, cyclists and public transport should be given over the private vehicle to achieve an efficient public transport route. As a result, Kāinga Ora seeks confirmation that Level of Service (**LoS**) for pedestrians, cyclists and public transport will be A, and conditions which specify that the safety and accessibility of active modes, micro-mobility and public transport will be prioritised over the private vehicle.

41. Kāinga Ora also considers that, given the length of the construction project, a key objective of the CTMP should be to provide these users with safe, direct and appealing routes of access during construction.
42. Kāinga Ora acknowledged that the Project proposes the removal of all give-way controlled slip lanes with associated intersection upgrades to “provide fully signalised vehicle and pedestrian movements, further reducing potential conflict with pedestrians and cyclists”<sup>8</sup> and that this has been identified as being one of the reasons where noticeable increases in delay and queue lengths are created. However, Kāinga Ora requests further information regarding how this interface and the treatment of these existing (to be altered) slip roads will be addressed, including how access will be retained while providing for an appropriate LoS for active modes.

#### *Micro-mobility and Active Mode Facilities*

43. Kāinga Ora notes that, as a result of the issues discussed above, many residents within the community will be required to walk long distances to / from the proposed bus stops to the neighbouring residential catchments. In order to mitigate this, and maximise accessibility to and from the proposed stations (and therefore patronage of the Project), Kāinga Ora is of the opinion that it will be important to provide for micro-mobility and active mode facilities at or nearby to the proposed RTS (i.e., cycle or scooter parking or storage etc). Conditions requiring the provision of such facilities when developing OPW are subsequently requested.

#### *Crime Prevention Through Environmental Design*

44. Kāinga Ora supports the requirement to provide details within the ULDMP of how the Project promotes a sense of personal safety by aligning with best practice guidelines such as Crime Prevention Through Environmental Design (**CPTED**) principals.

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<sup>8</sup> Refer Transport Assessment

## Flooding

45. The Assessment of Flooding Effects attached to the AEE lists the following positive effect<sup>9</sup>:

*"Raise the existing road levels to preventing flood flows across the road and reducing flood hazard (where this is not limited by existing flooding effects upstream) for road users"*

46. Kāinga Ora is concerned that this positive effect appears to be achieved at the expense of neighbouring properties. In particular, Kāinga Ora notes that proposed condition 14 'Flood Hazard' would enable an increase in the level of flooding toward adjoining properties. As an example, condition 14 proposes that a 10% reduction in free board for existing habitable floors is permitted, and an increase in flood levels of 50mm is permitted where there is no existing dwelling (among others).
47. It is of Kāinga Ora opinion that the Project should be required to manage the flooding effects within its own boundary.
48. Kāinga Ora requests that a flood hazard condition is added so that, simply put, the Requiring Authority does not worsen any flooding effects onto neighbouring properties and appropriately avoids, remediates and/or mitigates the effects of their construction activities.

## Noise and Vibration

### *Construction Noise and Vibration*

49. Kāinga Ora acknowledges that compliance with construction noise and vibration standards are not always practical and supports the management of construction noise and vibration by way of a CNVMP and CNVMS, provided this is in accordance with best practical options and provided the effects of construction noise and vibration are minimised as far as is practical.
50. Kainga Ora requests that they are directly consulted as part of the preparation of the CNVMP and CNVMS.

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<sup>9</sup> Section 4.1 of the submitted Assessment of Flooding Effects

### *Operational Noise and Vibration*

51. It is acknowledged that transport infrastructure is critical to enabling a well-functioning urban environment, and that a degree of noise and vibration emissions are expected. However, it must be recognised that significant noise emissions have potential adverse effects on surrounding residential environments and the health and well-being of people living nearby. Therefore, Operational Noise and Vibration requires careful consideration to ensure that the effects are appropriately avoided, remediated or mitigated in accordance with Section 16 and 17 of the RMA.
52. Kāinga Ora considers that the effect of the Project is a cumulative effect to the noise environment, based on the changes to the roading transport infrastructure since the dwellings within the surrounding environment were built.
53. Kāinga Ora is concerned that the Project does not fully assess the health effects associated with traffic noise of the Project. While the Project assesses the traffic noise effects in the context of NZS6806, Kāinga Ora is concerned that the standard does not fully capture the potential health effects of a proposal. This was raised within the Recommendation for the Notices of Requirement sought for the route protection of the Drury Arterial Network (which in turn took reference and guidance from the Board of Inquiry decision for the Waterview Connection)<sup>10</sup> where it was noted that NZS 6806: potentially discounts the adverse cumulative effects of elevated noise on recipients; inadequately addresses those parts of s.5 (2)(c) of the RMA concerned with avoiding, remedying and mitigating adverse effects; does not engage those parts of Section 7 of the RMA concerned with amenities and the quality of the environment likely to be of concern to impacted persons; and inadequately addresses Section 16 of the RMA (among others).
54. Consequently, Kāinga Ora requests further information regarding the health and safety effects of the Project (i.e., an assessment of these) including the cumulative effects, prior to the hearing. This does not appear to have been provided within the application documents due to the above, and due to the AEE not identifying this as a potential adverse effect.
55. Kāinga Ora notes that Auckland Transport identifies that activities subjected to an operational noise level of 55 dB LAeq require mitigation to address potential adverse

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<sup>10</sup> Refer paragraph 229 of the Recommendation for the Notices of Requirement sought for the route protection of the Drury Arterial Network dated 20 April 2022

health effects. Kainga Ora requests a condition requiring operational noise levels to not exceed 55 dB LAeq beyond the boundaries of the designation or, where exceeded at a sensitive receiver, mitigation is provided.

56. This operational noise level was the baseline utilised within Auckland Transport's Acoustic Expert Evidence by Claire Drewery for Private Plan Change 51 (**PPC51**)<sup>11</sup>, who considered that there are adverse health effects in relation to road traffic, referencing both the World Health Organisation (WHO) Environmental Noise Guidelines for the European Region (2018) and enHealth's The Health Effects of Environmental Noise (2018). The WHO's guidelines are (in part) copied below:

***WHO guidelines for Community Noise 1999 states the following in relation to dwellings***

***[page xiii]***

*... The effects of noise in dwellings, typically, are sleep disturbance, annoyance and speech interference. For bedrooms the critical effect is sleep disturbance. Indoor guideline values for bedrooms are 30 dB LAeq for continuous noise and 45 dB L<sub>Amax</sub> for single sound events. Lower noise levels may be disturbing depending on the nature of the noise source. At night-time, outside sound levels about 1 metre from facades of living spaces should not exceed 45 dB LAeq, so that people may sleep with bedroom windows open. This value was obtained by assuming that the noise reduction from outside to inside with the window open is 15 dB. To enable casual conversation indoors during daytime, the sound level of interfering noise should not exceed 35 dB LAeq. To protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady, continuous noise should not exceed 55 dB LAeq on balconies, terraces and in outdoor living areas. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound level should not exceed 50 dB LAeq. Where it is practical and feasible, the lower outdoor sound level should be considered the maximum desirable sound level for new development.*

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<sup>11</sup> Paragraphs 6.7 and 6.9 of Statement of Evidence of Claire Drewery on behalf of Auckland Transport – Acoustic, dated 24 August 2021 for Private Plan Change 51 – Drury 2 Precinct.

***WHO Environmental Noise Guidelines for the European Region (2018) states the following***

***[page xiii]***

*Environmental noise is an important public health issue, featuring among the top environmental risks to health. It has negative impacts on human health and well-being and is a growing concern among both the general public and policy-makers in Europe.*

***[page xvi]***

*For average noise exposure, the Guideline Development Group (GDG) strongly recommends reducing noise levels produced by road traffic below 53 decibels (dB) Lden, as road traffic noise above this level is associated with adverse health effects.*

Based on the above, Ms Drewery adopted *55 dB LAeq(24 hour)* as the noise level above which potential health effects could occur and made subsequent recommendations for PPC51. Kainga Ora considers that it is appropriate that that any health effects arising from the operation of the road environment should be addressed and that the NOR should include conditions limiting noise beyond the designation boundary to *55 dB LAeq(24 hour)* consistent with the levels adopted by Ms Drewery. In circumstances where this can not be achieved then noise mitigation to affected receivers should be provided.

57. Kāinga Ora considers that it is appropriate that the Requiring Authority is incentivised to ensure that such measures are undertaken to reduce noise and vibration at source, while at the same time utilising the AUP to manage those effects that cannot be controlled at source, if required.
58. Kāinga Ora submits that there would be a number of advantages with minimising noise and vibration at source that should provide benefits to future residents in surrounding urban areas, namely the ability for existing and future occupants to enjoy greater amenity outside their dwellings. While acoustic attenuation could be an appropriate response to address a health or amenity issue, any reduction of noise (or vibration) at source would enable future residents to enjoy their outdoor living areas, rather than being 'locked-up' in their homes.
59. At the same time, Kāinga Ora submits that there may be circumstances whereby existing dwellings that experience increased exposure to noise and vibration require

further mitigation in the form of building modifications, including but not limited to wall insulation, double glazing, forced ventilation and temperature controls. Kāinga Ora would like to discuss this aspect with the Requiring Authority.

60. Kāinga Ora is concerned that the conditions as drafted are not user friendly, are over complicated and would be difficult to understand for adjoining landowners. Kāinga Ora requests that the conditions are simplified for the benefit of adjoining land owners.
61. Kāinga Ora supports the application of structural mitigation measures (low noise and vibration road surfaces, acoustic barriers insulation, where appropriate) to all roads within the NoR. However, it is sought that where mitigation is applicable along the alignment of the Project, that this offer for mitigation shall stay in perpetuity (i.e. not be limited to three months), until an offer has been taken up, in the interests of natural justice and mitigating adverse health effects for future occupiers.
62. Kāinga Ora requests that condition 28 (Low Noise Road Surface) is amended to require the use of low noise and vibration road surfaces, such as an Asphaltic mix surface, for all road surfaces within this designation, unless further information confirms that this is not warranted from a health and safety perspective.

## **Other Items**

### *Utilities*

63. Kāinga Ora supports the preparation of a NUMP. Kāinga Ora considers that the NUMP should make also provision for potential upgrading and / or future proofing of existing infrastructure and utilities given changing urban environment, uplift in density likely to be facilitated by the Project and preference to avoid disturbance and rework in the future (i.e. post completion).

### *Validity of Advice Note – Designation Boundary*

64. Kāinga Ora has concerns with the validity of the advice note associated with condition 13 (UDLMP) which states that a front yard setback is not required from the designation boundary as the designation is not proposed for road widening purposes. It would appear to Kāinga Ora that the proposal is, at least in part, for road widening to accommodate the Project. A designation cannot modify a rule in the plan, and it is expected that the Council are likely to require the front yard to be taken from the

designated boundary which would potentially result in unintended consequences along the alignment of the Project, and compromise efficient land use and development along the Projects alignment.

#### *Designation Review*

65. The proposed designation conditions include a requirement for the Requiring Authority to review the designation within 6 months of completion of construction or as soon as otherwise practicable (proposed condition 3). While Kāinga Ora generally supports this notion and the intent to do this as soon as is practical, Kāinga Ora considers that the condition should also include a requirement for the Requiring Authority to provide the land in a suitable state once the land is relinquished from the designation and surrendered, in agreement with the property owner.

#### **Relief Sought**

66. Kāinga Ora seeks the following further actions regarding the NoR:
- (a) That the Requiring Authority continues to engage with Kāinga Ora, prior to hearing, on the effects of displacement on Kāinga Ora tenants as a result of the proposed property acquisition.
  - (b) That the Requiring Authority adopts a more 'refined' approach in determining the extent the proposed designation boundary and the construction requirements, to ensure that only the minimum amount of land required is designated, and that the designation boundaries are refined accordingly with details provided prior to the hearing.
  - (c) That the Requiring Authority further explores, in consultation with Kāinga Ora, opportunities for additional safe mid-block crossing points and stations, including but not limited to between Ormiston and Dawson Roads, and at the intersection of Te Irirangi and Hollyford Drives and Boundary Road, as well as safe mid-block crossing points along the Project's length.
  - (d) That the Requiring Authority provides further information regarding how the interface and treatment of existing (to be altered) slip roads will be addressed, including how access will be retained while providing for an appropriate LoS for active modes.



- (e) That the Requiring Authority undertakes an assessment of the health and safety effects of the operational traffic noise, inclusive of the cumulative effects prior to the hearing.
  - (f) That the design of the Project is updated to incorporate the full suite of recommendations contained within (a) to (e) above, or alternatively that appropriate conditions are recommended requiring the recommendations within these assessments to be incorporated.
67. Kāinga Ora seeks the following decisions from Auckland Council regarding the NoR:
- (a) That Kāinga Ora, as a key stakeholder, is explicitly included as partners to be involved in the preparation of management plans and future OPW's for the Project, with associated amendments to the conditions to reflect this.
  - (b) The provision of a condition that requires the LoS for pedestrians, cyclists and public transport will be 'A' along the Project's length.
  - (c) The provision of a condition that requires the safety and accessibility of active modes, micro-mobility and public transport to be prioritised over the private vehicle.
  - (d) That condition 18 (CTMP) be amended to identify a key objective of the CTMP as being to provide active and micro-mobility modal users with safe, direct and appealing routes of access during construction.
  - (e) The provision of a condition which requires the provision of facilities for micro-mobility and active modes at, or nearby to, RTS as part of future OPW's.
  - (f) The provision of a condition which requires that, where property access that exists at the time of submitting the OPW is altered by the Project, that the Requiring Authority shall consult with the directly affected land owner regarding the changes requires and the OPW should demonstrate how safe alternative access will be provided.
  - (g) That condition 14 is amended to require the Requiring Authority to ensure that the Project does not worsen any flooding effects onto neighbouring properties and appropriately avoids, remediates and/or mitigates the effects of their construction activities.

- (h) The provision of a condition requiring operational noise levels to not exceed 55dBA beyond the boundaries of the designation and, where exceeded at a sensitive receiver, mitigation to then be provided by the Requiring Authority.
  - (i) That where the operational noise effects require mitigation, that the offer for mitigation is retained in perpetuity, until an offer is taken up.
  - (j) A condition requiring that the Requiring Authority undertake monitoring of operational noise be included within the designation.
  - (k) That condition 28 (low road noise) is amended to require this to be on all roads within the designation.
  - (l) That condition 27 (NUMP) be amended to include a requirement to provide for upgrading and / or future proofing of existing infrastructure and utilities in consultation with key stakeholders, including Kāinga Ora and utility providers.
  - (m) That condition 13 (ULDMP) is amended as attached in Attachment A.
  - (n) That condition 3 (Designation Review) should be amended to:
    - (i) add a clause requiring the Requiring Authority to, once the land is relinquished from the designation, leave the subject land in a suitable condition in agreement with the property owner/s; and
    - (ii) add a clause requiring the Requiring Authority to assess in conjunction with the land owner, every 12 months following the lodgement of OPW(s), whether any areas of the designation that have been identified as required for construction purposes are still required, and identify any areas that are no longer required, and give notice to the Council in accordance with section 182 for the removal of those parts no longer required.
  - (o) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.
  - (p) Any other alternative or consequential relief to give effect to this submission.
68. In the absence of the relief sought, Kāinga Ora considers that the NoR:

- (a) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
  - (b) will compromise urban development outcomes;
  - (c) will in those circumstances impact on the ability of people and communities to provide for their social, economic and cultural wellbeing.
69. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
70. Kāinga Ora wishes to be heard in support of its submission.
71. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at hearing.

**Dated** this 11<sup>th</sup> day of April 2023



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**Brendon Liggett**  
Manager – Development Planning  
Kāinga Ora Homes and Communities

**ADDRESSES FOR SERVICE:**

Campbell Brown Planning Ltd  
PO Box 147001  
Auckland  
Attention: Michael Campbell  
Email: [michael@campbellbrown.co.nz](mailto:michael@campbellbrown.co.nz)

Kāinga Ora – Homes and Communities  
PO Box 74598  
Greenlane, Auckland  
Attention: Jennifer Chivers  
Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)

## Attachment A: Proposed Amendments to ULDMA

**Urban and Landscape Design Management Plan (ULDMP)**

- (a) A ULDMP shall be prepared **in consultation with key stakeholders** prior to the Start of Construction for a Stage of Work.
- (b) Mana Whenua shall be invited to participate in the development of the ULDMP(s) at least six (6) months prior to the start of detailed design for a Stage of Work to provide input on cultural landscape and design matters. This shall include (but not be limited to) how desired outcomes for the management of potential effects on cultural sites, landscapes and values identified and discussed in accordance with the Historic Heritage Management Plan (Condition **Error! Reference source not found.**) and the Ecological Management Plan (Condition **Error! Reference source not found.**) may be reflected in the ULDMP
- (c) The objective of the ULDMP(s) is to:
- (i) enable integration of the Project's permanent works into the surrounding landscape, **communities**, and urban context;
  - (ii) **ensure that the project integrates with the existing and proposed active mode network;**
  - (iii) **ensure that the Project provides for high levels of accessibility and safety for all users;**
  - (iv) ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to **the experience of** a quality urban environment **for people and communities;** and
  - (v) acknowledge and recognise the whakapapa Mana Whenua have to the Project area.
- (d) The ULDMP shall be prepared in general accordance with:
- (i) Auckland Transport's Urban Roads and Streets Design Guide;
  - (ii) Waka Kotahi Urban Design Guidelines: Bridging the Gap (2013) or any subsequent updated version;
  - (iii) Waka Kotahi Landscape Guidelines (2013) or any subsequent updated version;
  - (iv) Waka Kotahi P39 Standard Specification for Highway Landscape Treatments (2013) or any subsequent updated version; ~~and~~
  - (v) **Waka Kotahi Urban Street Guide;**
  - (vi) Auckland's Urban Ngahere (Forest) Strategy or any subsequent updated version;
  - (vii) **Auckland Council's Auckland Design Manual; and**
  - (viii) **Auckland Council's Transport Emissions Reduction Pathway**
- (e) To achieve the objective, the ULDMP(s) shall provide details of how the project:
- (i) is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), **community infrastructure**, natural environment, landscape character and open space zones;

- (ii) provides appropriate **high quality and safe** walking and cycling **and micro-mobility** connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections **(particularly to/from nearby centre and neighbourhoods (such as Otaru), including facilities at stations, such as cycle storage and micro mobility facilities;**
  - (iii) promotes inclusive access (~~where appropriate~~); and
  - (iv) promotes a sense of personal **and public** safety by aligning with best practice guidelines, such as:
    - A. Crime Prevention Through Environmental Design (CPTED) principles;
    - B. Safety in Design (SID) requirements; and
    - C. Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures.
  - (v) provides opportunities to incorporate Mana Whenua values and cultural narrative through the design. This shall include but not be limited to:
    - A. how to protect and enhance connections to the Māori cultural landscape
    - B. how and where accurate historical signage can be provided along the corridor;
    - C. how historical portage routes will be recognised;
    - D. how opportunities for cultural expression through, for example mahi toi, art, sculptures or other public amenity features will be provided;
    - E. how opportunities to utilise flora and fauna with a specific connection to the area are realised where possible by:
      - a. preserving them in the design and maintenance of the Project;
      - b. restoring them in a manner that recognises their historical and cultural significance. For example by clustering planting to represent a lost ngahere; and
    - F. how the historic and cultural significance of the Puhinui Historic Gateway is recognised; and
    - G. how, public access to coastal areas, waterways and open space is enhanced, where appropriate.
  - (vi) provides for an integrated stormwater management approach which prioritises in the following order:
    - A. opportunities for ki uta ki tai (a catchment scale approach);
    - B. opportunities for net catchment benefit;
    - C. green infrastructure and nature-based solutions; and
    - D. opportunities for low maintenance design.
- (f) At the discretion of Mana Whenua, the matters listed in (e)(v) – (vi) shall either be incorporated into the ULDM or prepared as a separate plan.
- (g) The ULDM(s) shall include:
- (i) a concept plan – which depicts the overall landscape and urban design concept, and explain the rationale for the landscape and urban design proposals;

- (ii) developed design concepts, including principles for **micromobility**, walking and cycling facilities and public transport; and
  - (iii) landscape and urban design details – that cover the following:
    - A. road design – elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses, benching, spoil disposal sites, median width and treatment, roadside width and treatment;
    - B. roadside elements – such as lighting, fencing, wayfinding and signage;
    - C. architectural and landscape treatment of all major structures, including bridges and retaining walls;
    - D. architectural and landscape treatment of noise barriers;
    - E. landscape treatment of permanent stormwater control wetlands and swales;
    - F. integration of passenger transport;
    - G. **micro-mobility**, pedestrian and cycle facilities including **parking/ storage**, paths, road crossings and dedicated pedestrian/ cycle bridges or underpasses;
    - H. **property access - including how access to adjacent sites is affected, what changes are proposed and what provision has been made to retain existing levels of amenity and functionality;**
    - I. **interfaces – how the interface with adjoining properties has been treated, including the treatment / interface with existing slip roads;**
    - J. historic heritage places with reference to the HHMP (Condition 23); and
    - K. re-instatement of construction and site compound areas, driveways, accessways and fences.
- (h) The ULDMP shall also include the following planting details and maintenance requirements:
- (i) planting design details including:
    - A. identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan (Condition 26). Where practicable, mature trees and native vegetation should be retained;
    - B. street trees, shrubs and ground cover suitable for berms;
    - C. treatment of fill slopes to integrate with adjacent land use, streams, riparian margins and open space zones;
    - D. planting of stormwater wetlands;
    - E. identification of vegetation to be retained and any planting requirements under the Ecological Management Plan (Condition 25) and Tree Management Plan (Condition 26);
    - F. integration of any planting requirements required by conditions of any resource consents for the project; and
    - G. re-instatement planting of construction and site compound areas as appropriate.
  - (ii) a planting programme including the staging of planting in relation to the construction programme which shall, as far as practicable, include provision for

planting within each planting season following completion of works in each Stage of Work; and

- (iii) detailed specifications relating to the following:
- A. weed control and clearance;
  - B. pest animal management (to support plant establishment);
  - C. ground preparation (top soiling and decompaction);
  - D. mulching; and
  - E. plant sourcing and planting, including hydroseeding and grassing, and use of eco-sourced species.

Watercare Services Limited

73 Remuera Road, Remuera,  
Auckland 1050, New Zealand

Private Bag 92521, Victoria Street West,  
Auckland 1142, New Zealand

Telephone +64 9 442 2222

[www.watercare.co.nz](http://www.watercare.co.nz)

**Submission on the Notices of Requirement for the Airport to Botany Bus Rapid Transit Project lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991**

**TO:** Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

**SUBMISSION ON:** Notices of Requirement ("**NoRs**") for the Airport to Botany Bus Rapid Transit Project

**FROM:** Watercare Services Limited ("**Watercare**")

**ADDRESS FOR SERVICE:** Mark Bishop  
Regulatory & Policy Manager  
Watercare Services Ltd  
Private Bag 92 521  
Wellesley Street  
AUCKLAND 1141  
Phone:022 010 6301  
Email: [Mark.Bishop@water.co.nz](mailto:Mark.Bishop@water.co.nz)

**DATE:** 11 April 2023

## 1. INTRODUCTION

1.1 Watercare is pleased to have the opportunity to make a submission on the five NoRs for the Airport to Botany Bus Rapid Transit Project ("**Project**") lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**"), and in particular:

- (a) NoR lodged by Waka Kotahi NZ Transport Agency to alter Designation 6717 State Highway 20B - State Highway 20 to Auckland International Airport;
- (b) NoR lodged by Auckland Transport for a new designation to widen Puhinui Road between the SH20/SH20B Interchange and Orrs Road to provide for a Bus Rapid Transit corridor and walking and cycling facilities;
- (c) NoR lodged by Auckland Transport for a new designation to widen the existing Puhinui Road between Plunket Avenue and east of the SH20/SH20B Interchange to provide for a Bus Rapid Transit corridor and walking and cycling facilities;
- (d) NoR lodged by Auckland Transport for Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue); and



(e) NoR lodged by Auckland Transport for a new designation to widen Te Irirangi Drive between Botany and Rongomai Park to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

1.2 Watercare recognises the aim of the NoRs is to improve connections between the major centres of Botany, Manukau, Auckland Airport and their employment areas to existing and intensifying residential areas in southern and eastern Auckland.

1.3 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

1.4 Watercare could not gain an advantage in trade competition through this submission.

## 2. WATERCARE – OUR PURPOSE AND MISSION

2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.

2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated three waters infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.

2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.<sup>1</sup>

2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan and the Auckland Future Urban Land Supply Strategy.

2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.<sup>2</sup>

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<sup>1</sup> LGA, s 59.

<sup>2</sup> Local Government (Auckland Council) Act 2009, s 57.

### 3. SUBMISSION POINTS AND RELIEF SOUGHT

- 3.1 This is a submission on all the NoRs that were publicly notified on 10 March 2023. In particular, this submission relates to the NoRs as they may potentially impact or interact with existing, or potential future, water and wastewater services.
- 3.2 Watercare recognises the aim of the NoRs is to improve connections between the major centres of Botany, Manukau, Auckland Airport and their employment areas to existing and intensifying residential areas in southern and eastern Auckland.
- 3.3 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies, or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.
- 3.4 Watercare acknowledges the proactive process to engagement from Waka Kotahi and Auckland Transport during the development of these NoRs including through discussions with the Supporting Growth Alliance, and the project work that preceded the Future Urban Land Use Strategy.
- 3.5 Watercare would like to ensure that in the future there is an active and continual process set up by the requiring authorities to recognise that third party infrastructure providers, including Watercare, have asset management and construction plans that are constantly updating and changing and that these updates and changes should be taken into account by the requiring authorities when the Project is developed further.
- 3.6 To that end, Watercare seeks to be engaged before detailed design and during the ongoing design phases to identify opportunities to enable, or otherwise not preclude, the development of new infrastructure within the Project areas. For example, this could involve the development of an "Infrastructure Integration Plan" prior to detailed design with third party infrastructure providers like Watercare (which can also be updated throughout construction of the Project) to ensure that the Project takes into account and appropriately integrates with potential future infrastructure like wastewater and water services.
- 3.7 It is expected that such an "Infrastructure Integration Plan" could include details of engagement undertaken (including any feedback from infrastructure providers), identify other potential infrastructure that may be developed within the Project areas and how the requiring authorities have enabled or otherwise not precluded the development of such infrastructure within the Project areas.
- 3.8 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as this Project develops.
- 3.9 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare,

this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).

- 3.10 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the Project does not impact its wastewater and water services in the Project area now and into the future. Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

#### 4. RECOMMENDATION SOUGHT

- 4.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the NoRs, including by way of conditions to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

- 4.2 Watercare wishes to be heard in support of this submission.

- 4.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Mark Bourne  
**Chief Operations Officer**  
**Watercare Services Limited**



## FORM 21

**Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991**

To: Auckland Council

**Name of submitter:** Ministry of Education - Te Tāhuhu o te Mātauranga ('the Ministry')

Address for service: Eden 5, Level 3/12-18  
Normanby Road  
Mount Eden  
Auckland 1011

Attention: Gemma Hayes

Phone: +64 963 80294

Email: [gemma.hayes@education.govt.nz](mailto:gemma.hayes@education.govt.nz)

**This is a submission on the Supporting Growth's Notice of Requirement for Airport to Botany Bus Rapid Transit – Notice of Requirement 3 (NoR 3) – Puhinui Station to SH20/20B Interchange**

This submission relates to the potential road safety effects on students in Puhinui and Manukau from heavy construction traffic

### **Background:**

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Auckland region.

**The Ministry of Education's submission is:**

Under the Resource Management Act 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.

Through its delivery partner, Supporting Growth, Waka Kotahi NZ Transport Agency and Auckland Transport have lodged five Notice of Requirements (NoRs) between Botany and Auckland Airport. The NoRs will collectively enable the construction of a Bus Rapid Transit (BRT) corridor to allow better transportation between Auckland Airport and Botany. The project will also enable stronger walking and cycling facilities. The project aims to respond to poor mode share, access to employment, and increased pressure on transport networks due to residential intensification in the area.

The Ministry broadly supports the project's aim to enable better public and active modes of transportation in South Auckland. However, there are a number of schools around the project corridor that could be affected by the construction of the BRT corridor, as seen in Figure 1. The Ministry seeks for potential heavy construction traffic effects on the safety of schools across the five NoRs to be appropriately addressed and managed. The Ministry's specific concerns are outlined below.

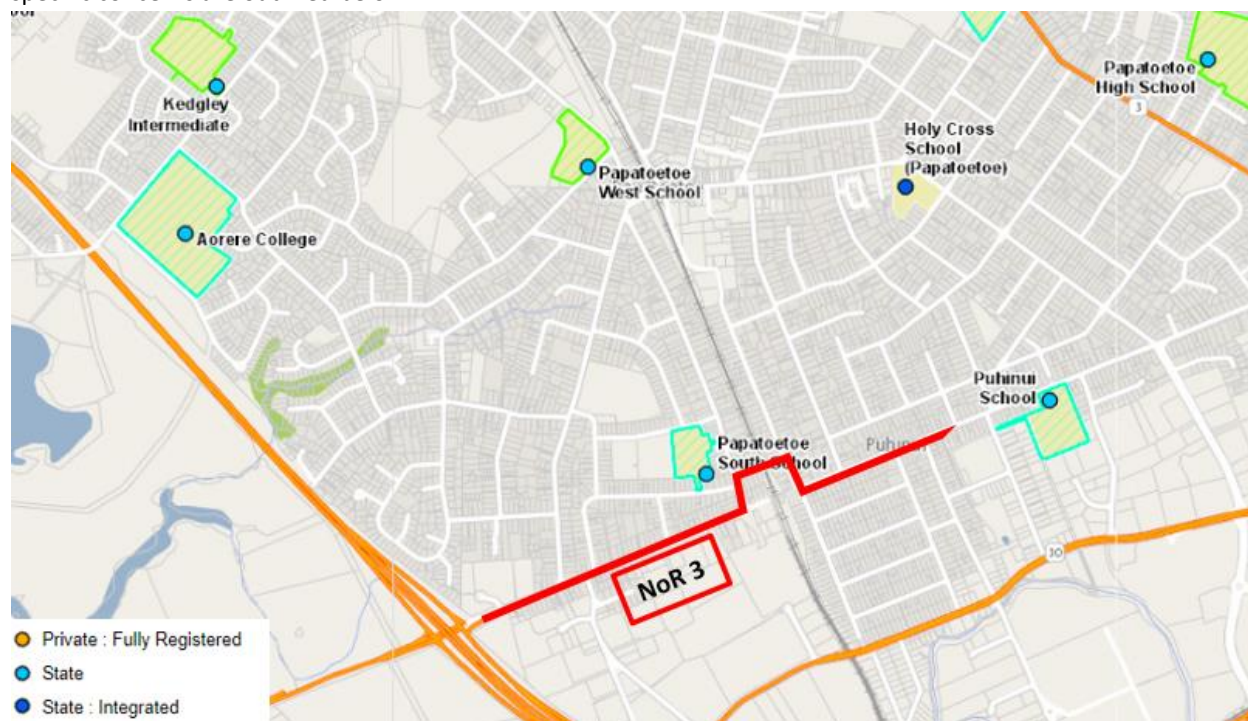


Figure 1: location of schools in relation to NoR 3

#### Construction traffic effects:

Supporting Growth has outlined that a Construction Traffic Management Plan (CTMP) will be prepared prior to the start of construction, which will include details on how to manage heavy construction traffic near schools. It will include specific non-working or non-movement hours around schools. Supporting Growth has identified Puhinui School as a school that needs to be considered in the CTMP. No other Ministry schools have been identified.

The Ministry appreciates Supporting Growth's willingness to prioritise student safety during construction. There are a number of other schools nearby asides from Puhinui School that should also be considered in the CTMP. These include Papatoetoe South School and Papatoetoe West School that are also located near the proposed BRT corridor (NoR 3) and there is the potential for these schools to be affected by heavy construction traffic given they are located on a potential construction traffic route. The Ministry requests that these schools be included in the CTMP and all heavy construction vehicles must avoid these schools at peak pick-up and drop-off times to maintain a safe environment for students to walk and cycle to school.

The Ministry requests a designation condition outlining the details to be included in the CTMP on how all heavy construction vehicles must avoid schools during pick-up and drop-off times. We have proposed a condition below. There is a diverse road network that surrounds the project corridor, resulting in multiple alternative routes around the schools/roads we have proposed to be avoided. Therefore, we do not see the acceptance of this condition to hinder Supporting Growth's construction programme.

### Decision sought

The Ministry is neutral on the Airport to Botany NoRs if Council accepts the following relief and any consequential amendments required to give effect to the matters raised in this submission.

The Ministry requests the following designation conditions:

1. The Construction Traffic Management Plan shall include details of consultation (including outcomes agreed) with the applicant and Puhinui School with regard to maintaining the safety of school students during construction. Details of all safety measures and interventions will be documented in the Construction Traffic Management Plan.
1. The Construction Traffic Management Plan shall include details on how all heavy construction vehicles must avoid the schools at peak school pick up and drop off times (during term time only) outlined in the table below. It is noted that new schools could establish around the project area before construction commences. Any new school on an identified construction route must be added to the table below. Engagement should be undertaken with the Ministry to confirm the information in the table below is still accurate closer to the time of construction.

Table 1: Schools that heavy construction vehicles must avoid at peak school pick-up and drop-off times

School Name	Address	Associated no travel route	Times heavy vehicles must avoid the schools (based off each school's individual start and finish times) <sup>1</sup>
NoR 3			
Puhinui School	116 Puhinui Road, Papatoetoe, Auckland 2104	Puhinui Road (between Clendon Avenue and Greath Souh Road)	8.10am 8.55am 3.00pm to 3.30pm

<sup>1</sup> Typically the morning school drop-off period is longer than the afternoon pick-up period. This is why on average we have requested a 45min window where trucks must avoid the schools in the morning. The afternoon peak pick-up period is typically shorter with students leaving the school grounds as soon as class finishes, which is why we only request a 30min window (on average) for the afternoon peak.

Papatoetoe South School	58A Milan Road, Papatoetoe, Auckland 202	Kenderdine Road and Milan Road	8.10 – 8.55am 3.00pm to 3.30pm
Papatoetoe West School	1 Hillcrest Road, Papatoetoe, Auckland 2025	Station Road	8.15am to 9.00am 2.45pm to 3.15pm

The Ministry looks forward to working with Supporting Growth to manage construction traffic effects on student safety.

**The Ministry wishes to be heard in support of its submission**

**Gemma Hayes**

**Principal Planning Advisor**

**Ministry of Education**

**Date:** 11 April 2023

## Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991  
FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to:

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

### **Submitter details**

**Organisation Name (if submission is made on behalf of Organisation)**

Te Ākitai Waiohua Waka Taua Trust

**Address for service of Submitter**

PO Box 59 185  
Mangere Bridge  
Auckland, 2151

Telephone: 021500054

Email: karen.a.wilson@xtra.co.nz

Contact Person: Karen Wilson

**This is a submission on the following notices of requirement:**

Requiring authority	NOR	Description
Waka Kotahi NZ Transport Agency	4b	Alternation to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport
Auckland Transport	4	Bus Rapid Transit – SH20/20B Interchange to Orrs Road
Auckland Transport	3	Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange
Auckland Transport	2	Bus Rapid Transit – Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue)
Auckland Transport	1	Bus Rapid Transit – Botany to Rongomai Park

**The specific parts of the above notice of requirement that my submission relates to are:**

The proposed conditions for NORs 1 to 4a.

**My submission is:**

We are neutral on the notices of requirement.

**The reasons for my views are:**



# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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

For office use only
Submission No:
Receipt Date:

## Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name) Satnam Bhatt

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

3/266 Puhinui Road, Papatoetoe, Auckland

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

**This is a submission on a notice of requirement:**

<b>By::</b> Name of Requiring Authority	Waka Kotahi NZTA
<b>For:</b> A new designation or alteration to an existing designation	Rapid Transit Corridor (NoR S3)

**The specific parts of the above notice of requirement that my submission relates to are: (give details):**

NoR 3 - 266 Puhinui Road, Papatoetoe, Auckland

**My submission is:**

I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
 I or we are neutral to the Notice of Requirement

**The reasons for my views are:**

Impact on residents and the well being of their children.  
Over-provisioning of the proposed and impacting the vast green space present within the land.  
Will be de-homing alot of families who have stayed there for over 10+ years.  
While I believe that the changes to the road are for a better future, they can still be done by

retaining and without having to acquire all of the land.

#39

It is a prime location for young families by being close to SH20, nearby schools, train station and Manakau mall for a sustainable future.

Please refer to additional pages for further feedback and opinions.

Please refer to some proposed changes in the documents in Appendix 1 for more information.

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

To re-consider the proposed boundry for acquiring the land.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

*Sutnam*

19 April 2023

Signature of Submitter

Date

(or person authorised to sign on behalf of submitter)

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

While, acquiring all the land is pretty daunting, I still oppose to it as I believe that this is not really solving the problem for traffic. There will still be 1 single lane each side for vehicles and 1 single lane for buses as per Figure A. This is also the existing configuration, and by still having the same configuration is not really solving any problem but yet causing stress and chaos amongst the residents of 266 Puhinui Road and neighbouring residential properties.

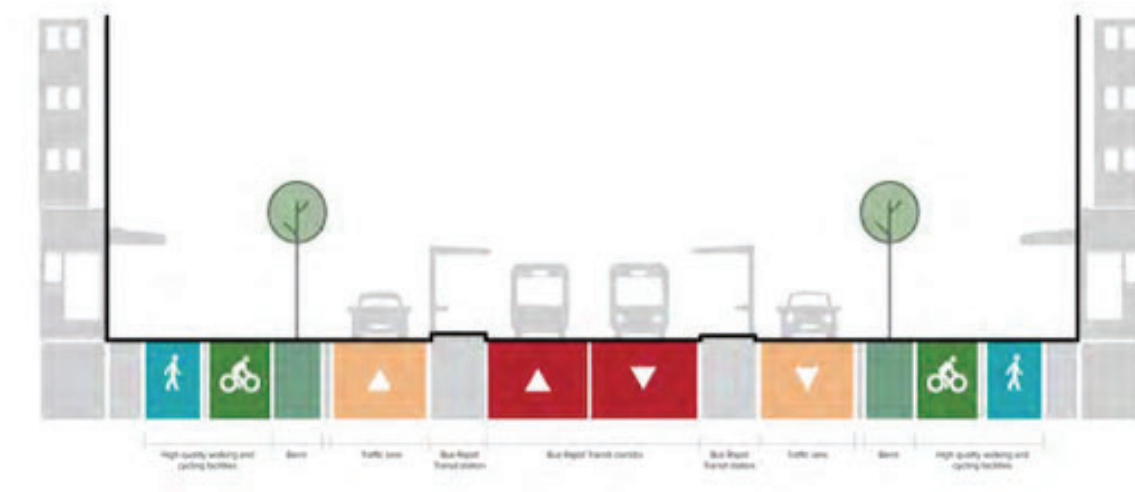


Figure A - Typical Cross Section as per the documents

I do understand the purpose of having the rapid bus corridor is to improve our public transport infrastructure from Airport to Botany. However, what is more important and required is an over bridge at Puhinui Station for the buses to have a straight route on Puhinui Road. That can be done within the train station space which also does not require any acquisitions of residential lands.

However, this will and still cause bottlenecks for both passenger vehicles and buses at the junction of the train-station. While, Auckland Transport is trying to solve the issues related to public transport, unknowingly, it is also creating a significant negative impact on the regular traffic and neighbouring residents that are impacted by this proposed design.

With regards, to assuming, if the proposed plans are approved, I would still want the land for 266 Puhinui Road to be taken into re-considering on acquiring and have proposed some changes for acquiring the land as per Appendix 1. In this way, we are not de-homing the residents, but also taking in account of the livelihood and ease of approach to the nearby amenities.

In conclusion, I am not convinced and do not agree to the proposed arrangement plans and would advise to consider other alternatives that are cost-effective and reliable.

## Appendix 1

Changes that can be made to the proposed boundary.



The dark blue line represents the new proposed boundaries which in approx. is 1-2 meters away from the walls of the houses. In this way, the council can acquire the land that is used for parking purposes by the 266 Puhinui Road residents.

The alternate for residents parking can be done on the backside of the properties which will need to be developed.

In this way, we can still maintain a lively neighbourhood with ease of access to the amenities and a secured parking.

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

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Auckland 1142

For office use only

Submission No:

Receipt Date:

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Anita Singh & Ramandeep Singh

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

233 Puhinui Road, Papatoetoe, Auckland 2025

Telephone:

221322022

Fax/Email:

any1884@yahoo.co.in

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Notice of Requirement for Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange

The specific parts of the above notice of requirement that my submission relates to are: (give details):

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

1. I have big parking issue that i alreday sent many time email to council to help for parking issue but i havent got any satisfactory reply.

2. In future if we plan to redevelop & make big house then its problem with small land.

3. If we plan to sale in future then small land also got a problem.

4. We Put new fence & New Gates to looks front beautiful

2470

(continue on a separate sheet if necessary)

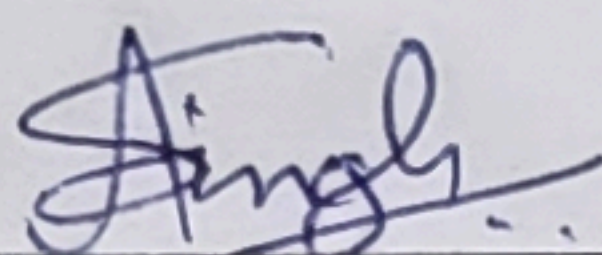
I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

1. How to Solve my parking issues
2. How much the Land consideration Cost AT can give us?
3. How about my new fence & new Gate considration?
4. If we can go with AT project can thay make big driveway to go two cars inside my driveway parking area?

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
(or person authorised to sign on behalf of submitter)

8/05/23

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Niksha Farac

### Organisation Name (if submission is made on behalf of Organisation)

Tunicin Investments Limited and Airface Limited

### Address for service of Submitter

Kilroy Group, Level 1, 110 Custom Street West  
Auckland 1010

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

<b>By::</b> Name of Requiring Authority	Auckland Transport
<b>For:</b> A new designation or alteration to an existing designation	Notice of Requirement for Bus Rapid Transit - SH20/20B Interchange to Orrs Road

### The specific parts of the above notice of requirement that my submission relates to are: (give details):

Refer to attached submission

### My submission is:

- I or we support of the Notice of Requirement
- I or we are neutral to the Notice of Requirement
- I or we oppose to the Notice of Requirement

### The reasons for my views are:

As set out in the attached submission

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

As set out in the attached submission

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

06/04/2023

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.



## Submission on a Notice of Requirement 4A: Bus Rapid Transit - SH20/20B Interchange to Orrs Road, walking and cycling facilities and associated infrastructure by Auckland Transport

To: Auckland Council

### Submitter Details

Name of Submitter: Tunicin Investments Limited and Airface Limited (**Tunicin**)

1. Tunicin makes this submission to the notice of requirement (NoR) for a proposed designation on State Highway 20B (referred to in the public notice as NoR 4a) lodged by Auckland Transport to the Auckland Unitary Plan – Operative in Part (**AUP**) in accordance with section 168(2) of the Resource Management Act 1991. The NoR is one of five from Auckland Transport and Waka Kotahi to enable connections between Botany, Manukau and Auckland Airport.
2. Tunicin is a landowning and development company, with significant land on Puhinui Road (State Highway 20B). With reference to the Auckland Transport NoR schedule, Tunicin properties affected by the designation are (and as depicted in Appendix A):

Owner	Property ID	Address	Title number	Legal Description	Approx. area of land to be designated (m <sup>2</sup> )
Tunicin Investments Limited	621149	420 Puhinui Road	NA116A/3325	Lot 2 DP 185572	7337
Airface Limited	621104	440 Puhinui Road	NA952/74	Lot 1 DP 36635	5781

3. Tunicin participated in the AUP process that resulted in the Puhinui Precinct and the operative Light Industry zone for the land. The AUP Puhinui Precinct provisions include a 40m setback from the current common boundary between the respective properties and Puhinui Road. This setback anticipated a future public transport project and the need for additional land. The 40m setback included a 10m landscaping yard for accommodation of the Puhinui Heritage Gateway.
4. Tunicin has also obtained several resource consents for subdivision and development of its land. In conjunction with Altrend Properties Limited and NZ Storage Limited, Tunicin is in the process of obtaining resource consents for the development of a four-way intersection at the current Manukau Memorial Gardens access intersection with Puhinui Road. Waka Kotahi has provided written approval to this application.

## Scope of Submission

5. The submission relates to NoR 4a as a whole.
6. Tunicin generally supports the purpose and intent of the public works enabled by NoR 4a, and the related NoRs, for the creation of a bus rapid transit corridor and walking and cycling facilities. However, Tunicin opposes NoR 4a because it would not:
  - a) promote the sustainable management of physical resources, including enabling people and communities to provide for their health and safety, and their social, economic and cultural well-being;
  - b) adequately address adverse effects on Tunicin's land, and its ability to develop that land and operate business activities;
  - c) promote the efficient use and development of physical resources; and
  - d) ensure consistency with good resource management practice.
7. Without limiting the generality of the above, the specific reasons for Tunicin's opposition include (but are not limited to);
  - a) NoR 4a extends over significant amounts of each of the two landholdings. With reference to 440 Puhinui Road, the approximate area of the designation is 5781m<sup>2</sup> (48%) of the total 1.212ha. The 7337m<sup>2</sup> of designation over 420 Puhinui Road is also significant.
  - b) In addition to designating almost half of 440 Puhinui Road, the proposed extent (depth) of the designation compromises access to this block of land.
  - c) The NoR 4a boundary extends well beyond the 40m setback of the Precinct Provisions, taking in existing streams and wetlands. Whilst the utilisation of the 40m setback was anticipated by Tunicin in its current land development, it was surprised by the proposal for an additional 10m-12m width of land required for the designation. Tunicin has not been consulted about this additional requirement which appears to arise from assumptions about post-earthwork land levels on the Tunicin land on each property. The NoR 4a plans depict a large cut within 440 Puhinui Road and a large fill within 420 Puhinui Road. These changes to land levels may not be required for the designation when Tunicin's proposals are taken into account. As a consequence, the designation need not take this extent of land.
  - d) The NoR documentation does not appear to recognise or make provision for the 10m landscape yard or the Puhinui Heritage Gateway within the revised designation cross-section.
8. Tunicin notes that Auckland Transport seeks a 15-year lapse period for the designation in order to ensure that funding is allocated and the works can be implemented. During this period of time the Puhinui Precinct land, including that land along the Puhinui Road frontage, will be developed. Consequently, Tunicin wishes to ensure that the proposed

works are progressed in a way that enables affected landowners to plan the development of their land with confidence. Tunicin considers that the uncertainty created by having land subject to a notice of requirement for an indeterminate period of time to be unacceptable from a business perspective and not in accordance with good resource management practice.

9. In these circumstances, Tunicin considers it premature to apply a designation to its land, particularly with the lapse date requested and at the width sought, when the timeframe for detailed design, funding, landowner engagement and Public Works Act 1981 acquisition processes, and ultimate commencement of the Project, is uncertain. The 15 year lapse period is particularly inequitable for 440 Puhinui Road, where the extent of the designation compromises any development.

#### Decision Sought

10. Accordingly, Tunicin seeks the following recommendation from Auckland Council:
  - a) Reject the notice of requirement; or
  - b) Alternatively amend the notice of requirement to give effect to the concerns raised in this submission.

**DATED** this 6<sup>th</sup> day of April 2023



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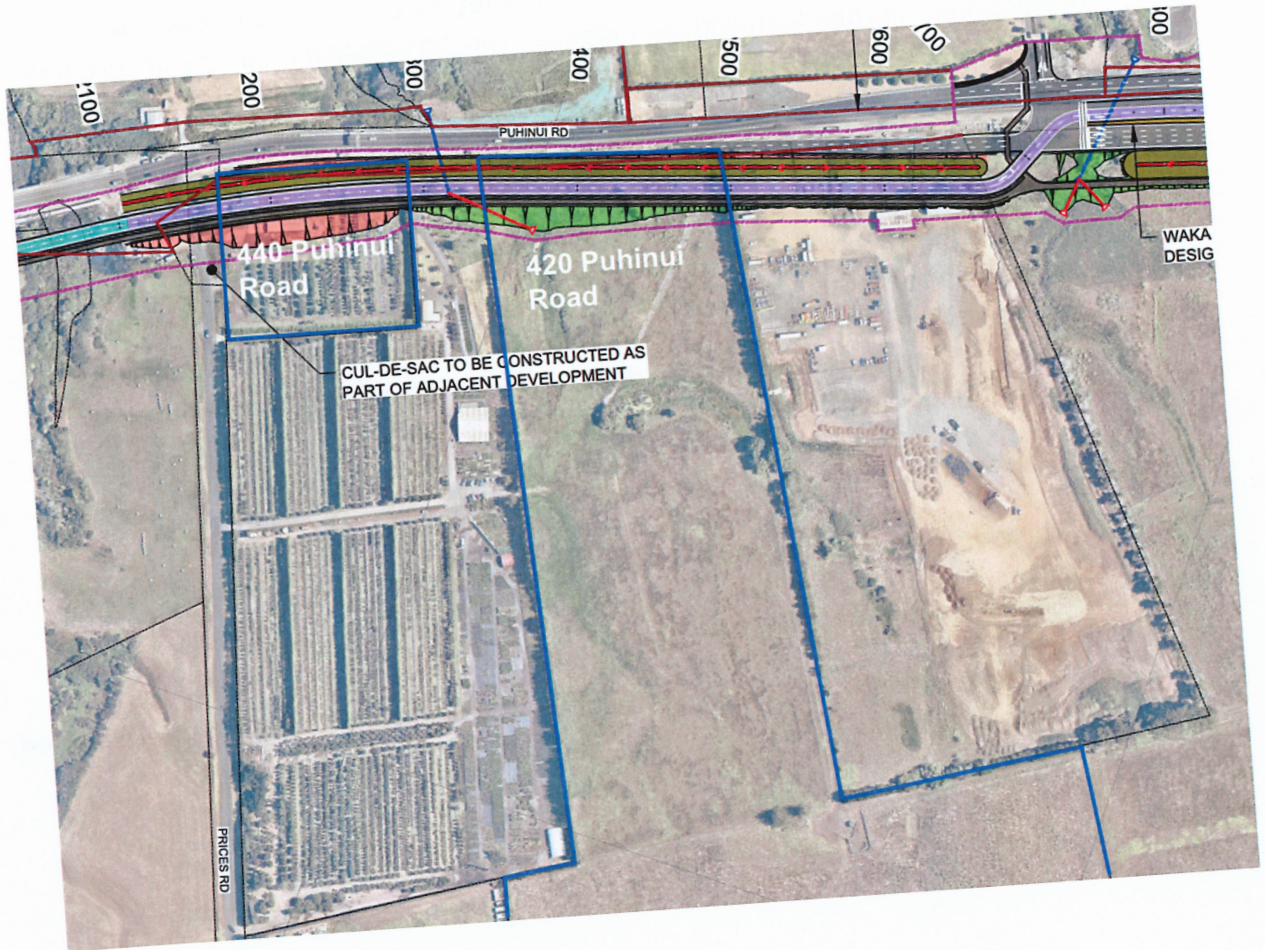
**Name:** Niksha Farac for Tunicin Investments Ltd and Airface Ltd

**Address for Service:** Kilroy Group  
Level 1, 110 Custom Street West  
Auckland 1010

**Email:** [niksha@zelkogroup.co.nz](mailto:niksha@zelkogroup.co.nz)

**Phone:** 021 899 912

Appendix A



5 April 2023

Planning Technicians  
Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Dear Sir

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

In response to Auckland Council letter dated 10 March 2023.

We are the residents on Puhinui road, Papatoetoe and will object to destination process on our property/properties. There are many reasons that the vulnerable residents will impact from this construction and the livelihood and wellbeing of the residents will be lost.

The Auckland transport failed to provide a proper consultation with the residents of Puhinui road. The only two letters as dated received by the residents and Auckland transport neglected proper process.

There was one of the so-called 'community engagement' summaries in 2019 we found by digging through many layers of documents online. The residents of Puhinui road were not consulted or any information been shared.

The AT has failed to inform the affected residents and the owners were shocked when they received a letter that our property is at risk. It is a very unfair process and AT only consulted the general public and received only their opinion to increase the in favour of the project. AT has failed to door knock and spoke to the affected individuals.

The costs for the project will be over 2 billion, but Auckland transport has undervalued the cost to win funding from the government. It's a cunning plan from day one when AT never worked on true figures and hardly contacted or get public views for this project.

Not many have or excess to internet and some have English speaking difficulty. AT is trying to take away people's pride and many family homes without even their consent and proper consultation. Many people are not even aware that AT is interested in their property and to replace it with Bus line.

1. Puhinui residents are not aware of any partners and key stakeholders: presentations, small group meetings and one-on-one meetings as required; • potentially affected property owners/occupiers and businesses within the programme area: mail drops/ flyer, community open days, online information, visualisation, and one-on-one meetings as required; and • general public: community open days, online information and visualisation as stated by Auckland Transport.

2. We are appalled that AT seems to think we, as residents, have been 'consulted'. The maps used are very broad and general, and it is only with the benefit of hindsight that we can read them and see anything other than the bus lanes that have already been installed.
3. Apparently 'affected residents' only get few mails drop as dated above and chances to attend a couple of 'consultation' event via Teams. The businesses were meant to have had a 'drop in' from AT reps, though the ones we have spoken to have no recollection of such drop ins.
4. The dates shown on consultation was pandemic year and Residents were not able to go or get proper consultation. The residents of Puhinui road have just found out what they received those two letters from the Auckland Transport.
5. This is taking place in a city that's barely recovering from a global pandemic, where households have been hit by all types of hardships: physical, financial, emotional, etc. We residents worked hard and build a house and a family home for the future. Suddenly someone just want to wipe out our livelihood and future of our children and grandchildren.
6. It is unfair process AT. I am sure that there will be other means and ways to deal with this project without putting further hardship and mental and emotional stress to the residents. There is other alternative such as Cavendish Drive which is commercial and less destructive to the residential occupant.
7. Both Cavendish Drive and Puhinui road can be utilized and save hundreds of vulnerable families homes and same money can be used elsewhere.
8. Some houses were built within last four years, but the council or AT never informed the homeowners that their properties will be impacted in future. Very poor planning and lack of care has been seen.
9. Puhinui Road has been constructed so many times. Poor planners at AT and it costs taxpayers and rate payers so much unnecessary spending. Hundreds of Pohutukawa were planted and then destroyed by the AT on recent construction. That money could have been used and spent elsewhere.
10. There are many family homes and new homes built for the families and grandchildren and even designed for home base businesses. ie: 154 Puhinui Road, 172 Puhinui road and many others. Having to relocate it will be detrimental to the families.
11. There is shortage of housing in Auckland particularly in South Auckland. Some residents have brand new homes and invest lots of money and they are devastated after hearing that their home will be taken away from them. If compensated how much, a compensation will not fix the emotional stress which will be a lifetime one.
12. The current roading and walkway is sufficient for the public. The buses on Puhinui road goes empty every 10 minutes. There are hardly any passengers in the bus. Why such a big investment

and waste of ratepayer's money. The money could be used for other more important things eg: Housing and health. More facilities and parking at public hospitals.

13. The people and (Ratepayers) of Auckland need more housing and healthcare care including many other more important necessities. After the pandemic cost of living has gone skyrocketing and government intervention is imperative and funding is required. Funding needed for public safety from the government. It seems AT has no idea that other places contribution and funding is required rather than only focusing in roading. For the size of south Auckland population right now we have road to cater the population. Puhinui road doesn't require widening and it is unfair to take away homes from the vulnerable.
14. The bridge at the airport need widening and that should be a priority. Currently commutes facing difficulty to enter airport which is only two-line bridge. The AT planners should focus on more important issues right which is the bridge and other part of Auckland like harbour bridge.
15. There are some residents who operates businesses from home and those will immensely be affected. Relocating will be very costly and will impact on customers and their business. Most of us are just recovering from the Pandemic and AT has some came up some crocket ideas just before the next election.
16. There is other better planning can be possible with affecting the residents. At present Puhinui road is wide enough and used for the bus lines on each side and plus the cars etc. The walkway is wide enough to be shared with bike lines. The other alternative is that AT can purchase half mitre on both sides to allow the bike line separately. Some owners were told recently that only a metre of their land will be bought, there is mix and inaccurate information form the AT. This will be less costly, and the residents' properties can be saved the money could be used for other more important projects.
17. Therefore, market rate is not a fair since the homeowners will lose lifetime and interest for their lifetime. Whereas others who retain home and not affected still assessed at market rate. It will only fair to consider double the market rate to enjoy and purchase another property elsewhere. The government should change the law immediately under public act to stop taking properties and those affected for relocation. We don't live in communist country and our land should not be taken away by force.
18. The AT has already did road improvements on Puhinui Road during 2021-2022. It must have cost the taxpayers and rate payers millions of dollars. The road for the purpose is perfectly fine. Why AT would like to demolish the road and to redo it again. It is bad planning by AT. It has been a nuisance for many years of unnecessary constructions on this road.
19. There are few new homes are on build and why Auckland council gave permit to build. The new homes will be affected and the cost mount up for the homeowners.
20. Government should stop revisit the legislation and not to force homeowners to leave their loved home. In stream case if it became necessary to leave than government should pay double of the market value. This in ease the pressure and hardship on the homeowners to relocate or build a home for their future.

21. My family purchased a land on 154 Puhinui Road, Papatoetoe about 25 years ago and built a new 3-bedroom house. We worked hard and bought up our kids and we never thought of moving out. Kids grown up and in 2017 we re-built and extended brand new house. We invested quality products inside and outside the house because this is our family home.
22. We planned to live and basically die in this house. We never knew or thought of moving out from this house. Our grandchildren's future to stay closer to school, shopping, and office to run my business and to serve community as a JP for the past 25 years.
23. It devastating for my family once we received letter from AT. We never been consulted or been seen by any AT member. We are having a sleepless night as we get up in the morning and think that we going to lose our best home. We don't have any other property and put everything and life interest in this home.
24. It is very hard to buy a comparable house with a separate office nearby. Also, it will be difficult to get loan from the bank and many other factors. The other factors such as housing market and shortage. We rebuilt our house in 2017 and if we have to build with same spec it will cost more since the price of material has gone up.
25. After talking to AT once few weeks ago, I was advised that they will start purchasing houses around 2026-2027. It was a shock to us and since then we are very upset and worried. There was no proper consultation and AT and the planners are at fault and deceived us for having a proper consultation.
26. Recently we heard that one property is already bought by AT. I have been told property at 1/199 Puhinui road has been purchased by AT. The project hasn't been gone ahead or approved yet, why and how AT could purchase this property. It is matter of interest that how matters are hidden under the carpet. Where taxpayers' money is spent unnecessary. The residents are kept in limbo and the matter is not transparent. The public works Act is too old and need immediate revision.
27. It is evident from the recent comments from the public after the Stuff NZ news on 20<sup>th</sup> October 2022, that this project and destroying over 400 homes will be waste of taxpayers' money. Light rail will be sufficient to replace bus line with a track.

[Hundreds of Auckland homeowners could lose land to busway project | Stuff.co.nz](#)

28. Puhinui road is heavily populated with residents and school. It will be unsafe to build a motorway on this street. Whereas Te Irirangi Drive- straight through Cavendish drive -via Clendon Road will be better choice while it is more of a commercial area. The residents don't want a motorway and through heavily populated residential area on Puhinui road, considering Puhinui primary school and childcare facilities on Puhinui road.
29. The residents on Puhinui road are protesting to the Government /Auckland Council, Auckland Transport and Waka Kotahi NZ to refrain from taking our properties and our life interest.

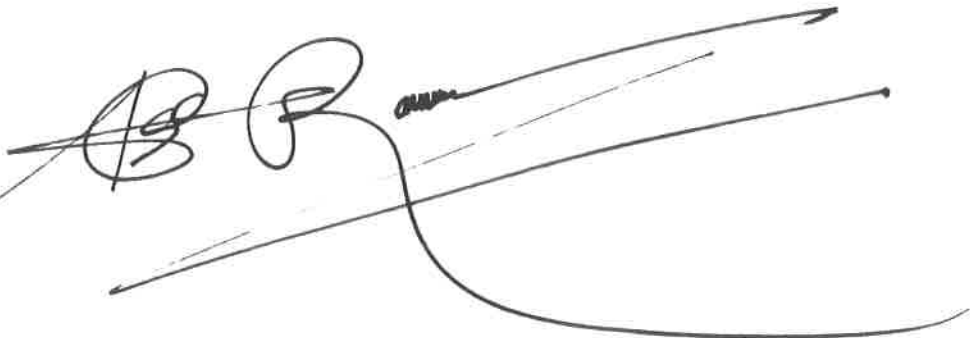


30. Since the Puhinui residents came to know that they may lose their homes, so they will not do any home improvement. This street will look ugly, and they will not be able to get a true value on their property. The government should look at changing the Public Works Act so that in this case people are properly compensated if their properties are affected.
31. Having a happy family and a nest (House) for the family is very important to any individual. It the most expensive asset that one can have in a lifetime. No one would like their nest to be taken away so easily. It is cruel and greedy that AT and government to any individual. AT can afford to buy our homes but we poor citizens can't afford to build or buy same house elsewhere. We are getting old. Please don't destroy our hard-earned asset and our precious temple. Cost of relocation will be daunting and very stressful and costly. This news and project driving people towards mental illness.
32. There are many public and homeowners support to stop this impact and stress on well settled residents. The government should intervene and find some other alternative to concur this serious issue. Just STOP these and take off the designation on the property titles on our properties. We all are in extreme stress and having a sleepless night and some owners getting emotionally stressed because there are no counselling services were provided. AT will be responsible for homeowners illness.
33. We request government and Ministers to intervene and stop this project going forward and use other alternative route such as Cavendish Drive that was initially planned. And do not run a motorway in the middle of heavily populated residential homes and schools.
34. **We have attached 33 signed objections – to stop taking our nest away and stop designation process or make any changes.**

Homeowner/ home business:

Kamlesh Rana JP  
Immigration Adviser  
Marriage Celebrant

154 Puhinui Road, Papatoetoe Papatoetoe

A large, stylized handwritten signature in black ink, appearing to be 'Kamlesh Rana', is written over the signature line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Ashok & Aneeta Krishna

Address: 85 Puhinui Road, Papatoetoe

Phone Number: 0211229969

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: JOHN SADD

Address: 196 PUHINUI ROAD

Phone Number: 0211272046

Signature: 

*Come to visit*

*JOHNNY ISAAC 22 @gmail.com*

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION - TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: KENENDRA SWAMY (JAMES)

Address: 2/179 PUHINUI ROAD, PAPATOETOE

Phone Number: 022-5263757

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: MAXINE DEER

Address: 1/148 Puhinui Road Papatoetoe

Phone Number: 021-02422149

Signature: 

Household of 4 kids 14, 10, 9, 5  
And myself.

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Suphraj Rana

Address: 93 a Puhinui Road Papatoetoe

Phone Number: 022 530 586

Signature: [Handwritten Signature]

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION - TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: CHRIS HANS

Address: 2/187 PUHINUI RD

Phone Number: 021 566 783

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION - TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: PHUONG

Address: 136 Puhinui Rd

Phone Number: 021 252 1832

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**


Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: ABDUL SHARIF

Address: 205 PUHINUI RD

Phone Number: 0210587614

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

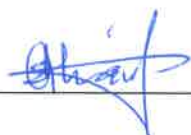
Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: ABDUL SHARIF

Address: 205A PUHINUI RD

Phone Number: 0210587614

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: CHANDRA LATA SINGH

Address: 190A PUHINUI ROAD, PAPAETOETOE

Phone Number: 02102489389

Signature: CRK

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**


Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: UDAY SINGH

Address: 190A PUHINUI ROAD, PAPATOETOE

Phone Number: 0211219151

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

**The Homeowner/s  
On Puhinui Road  
Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Aaron Chand

Address: 124 Puhinui road

Phone Number: 02711609813

Signature: Aaron

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Avilash Chand

**Address:** 124 Puhinui Road

**Phone Number:** 0210513710

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

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On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: REGNA RANI / MANI

Address: 1/103 PUHINUI RD, PAPATOETOE

Phone Number: 0272295022 / 0277103007.

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

A note from a homeowner on Puhinui Road:

It was great meeting you in person to discuss the impact on the properties which are located on Puhinui Road. We are also residents which are being impacted by the future development. We have been living here since 2009 and it's truly shocking and unfortunate that we may lose our property which we have worked so hard to attain. This home has been our treasure and it hurts to be forced to give it.

I am wondering if the project is planned in the next 30 years, in which case I wonder why we are affected 25-30 years before it takes place. A similar situation happened to residents on Redoubt Road. I have heard that a few properties have been claimed 4-5 years back and there has still been no development. This resulted in the properties being rented now.

We do not want to face a similar situation. Why would we sell our properties at current market rates now when the property values are declining? Hypothetically, after 20-30 years from now, property values may increase, and development may still not have occurred. Resulting in our loss of our property for nothing and a loss. We are the ones being impacted by this heavily.

It does not make sense to be selling the property at current market rates as in the future the properties may be further developed. This would take away from possible investment opportunities for the homeowners and their future which relies on their property. We have future plans to develop our property for our children and grandchildren which is now at risk.

Relocation at current times is extremely difficult as the homes are extremely close to necessities daily. As most properties in Auckland are extremely expensive it would be near impossible to find a property at a similar calibre as the ones we own.

Regards,

Reena and Manjinder



Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Sandeep Kumar and Geeta Bhardwaj

Address: 3/89 Puhinui Road, Papatoetoe

Phone Number: 0211281831

Signature: Geeta / [Signature]

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Rawandeep Kaur

Address: 186A Puhinui Road Papatoetoe

Phone Number: 0224329794

Signature: R. Kaur

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

**Please Act now before it's too late:**

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Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Manginder Singh Birn

**Address:** 186 Puhinui Road, Papatoetoe

**Phone Number:** 0212146922

**Signature:** Manginder Singh Birn

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

**Please Act now before it's too late:**

**The Homeowner/s  
On Puhinui Road  
Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Champat Patel

**Address:** 165 Puhinui Rd. Papatoetoe

**Phone Number:** 021 022 60547

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: NIRAJ BHUTANI + ABHA WALIA

Address: 119 PUHINUI RD, Papatoetoe

Phone Number: 0211005791, 021 0296 7474

Signature: Niraj Bhutani Abha Walia

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Mohammed & Sazia Khalil

Address: 264 & 264a Puhinui Rd. Papatoetoe

Phone Number: 02102738836

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

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Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora Dairy shop owner.

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Bhavesh Patel

Address: 284 Puhinui rd

Phone Number: 0211571719

Signature: B. Patel

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: MARIE STUCKMAN

Address: 154 WYLLIE ROAD

Phone Number: 02107 83342

Signature: MBL

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



Please Act now before it's too late:

**The Homeowner/s  
On Puhinui Road  
Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

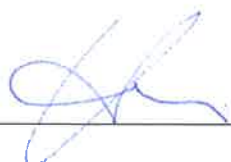
Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Amy Bui

Address: 219 Puhinui Road, Papatoetoe

Phone Number: 021 030 6983

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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Papatoetoe**

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora


I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland  
Transport and Waka Kotahi NZ for any impact on our property now or in any future  
projects.

*and the NZ Government*

**Name:** JOHN HANSFORD

**Address:** 138 PUHINUI RD, PAPATOETOE

**Phone Number:** 09-2780386

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: J GOULD

Address: 306 PUHINUI RD

Phone Number: 0272903306

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: BAL KRISHNA

Address: 2/199 PUHINUI ROAD - PAPATOETOE

Phone Number: 021964090

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

Or phone to pick: 0275267262

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On Puhinui Road  
Papatoetoe**

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** LES + CAROLINE TANA-TEPANIA

**Address:** 132 Puhinui RD

**Phone Number:** 021 792 025

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: GIANG THI LAM TRAN & TRUONG CONG NGUYEN

Address: 200 PUHINUI RD - PAPATOETOE.

Phone Number: 02108225414.

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Polly Ngakhe Walker

Address: 193 Puhinui Rd

Phone Number: 0275147866

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

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Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: LOKESH GERA

Address: 104A, PUHINUI ROAD, PAPATOETOE, AUCKLAND

Phone Number: 020415 77753

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



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Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Sharon Howell

Address: 2/193 Puhinui Rd

Phone Number: 0212573460

Signature: S. Howell

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM  
AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**


Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Fa'ana Campbell

Address: 148A Puhinui Road, Papatoetoe

Phone Number: 022 1990 187

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Khan Magbool

Address: 2 Ranfurly Rd Papatoetoe.

Phone Number: 022 032 8440

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

*Joel*

Landscape Spatial Concept

Blackbridge Nursery

DRAFT Landscape Concept plan

October 2022

Key design moves

- 1. Widening of main driveway entry to a minimum of 4500mm
- 2. Improved parking and turning area
- 3. Improved visitor experience into Blackbridge Nursery
- 4. Space for helipad
- 5. Retain display areas

- REMOVE WILLOW/ ALDER TO ENHANCE ENTRY EXPERIENCE AND VIEWSHAFT TO BLACKBRIDGE BUILDING
- WIDENING LIMITED ON LHS OF DRIVEWAY AT THIS POINT
- WIDENING OF DRIVEWAY ON RHS OF DRIVEWAY BY APPROX. 1200MM FOR A MINIMUM OF 4500MM
- AREA IN PINK BOX PROVISIONED FOR FUTURE ROAD WIDENING
- EXISTING ROCK WALL RETAINING APPROX 57M
- GRASS AREA RETAINED FOR DISPLAY
- WIDENING OF DRIVEWAY ON LHS OF DRIVEWAY BY APPROX. 1500MM FOR A MINIMUM OF 4500MM
- NARROWEST SECTION OF THE DRIVEWAY 3100MM
- REALIGN ROCK WALL TO FOLLOW NEW PROPOSED DRIVECOURT AREA
- INCREASE PARKING SPACES FROM X4 TO X7 - 8
- PROPOSED AREA FOR ENTRY COURTYARD TO ENHANCE VISITOR EXPERIENCE

- ENHANCED WETLAND AREA WITH LOW LEVEL PLANTING
- EXISTING STREAM AND OLPF

GRASS AREA RETAINED FOR DISPLAY

SEASONAL DISPLAY OF SPECIMEN TREES TO ENHANCE DRIVEWAY

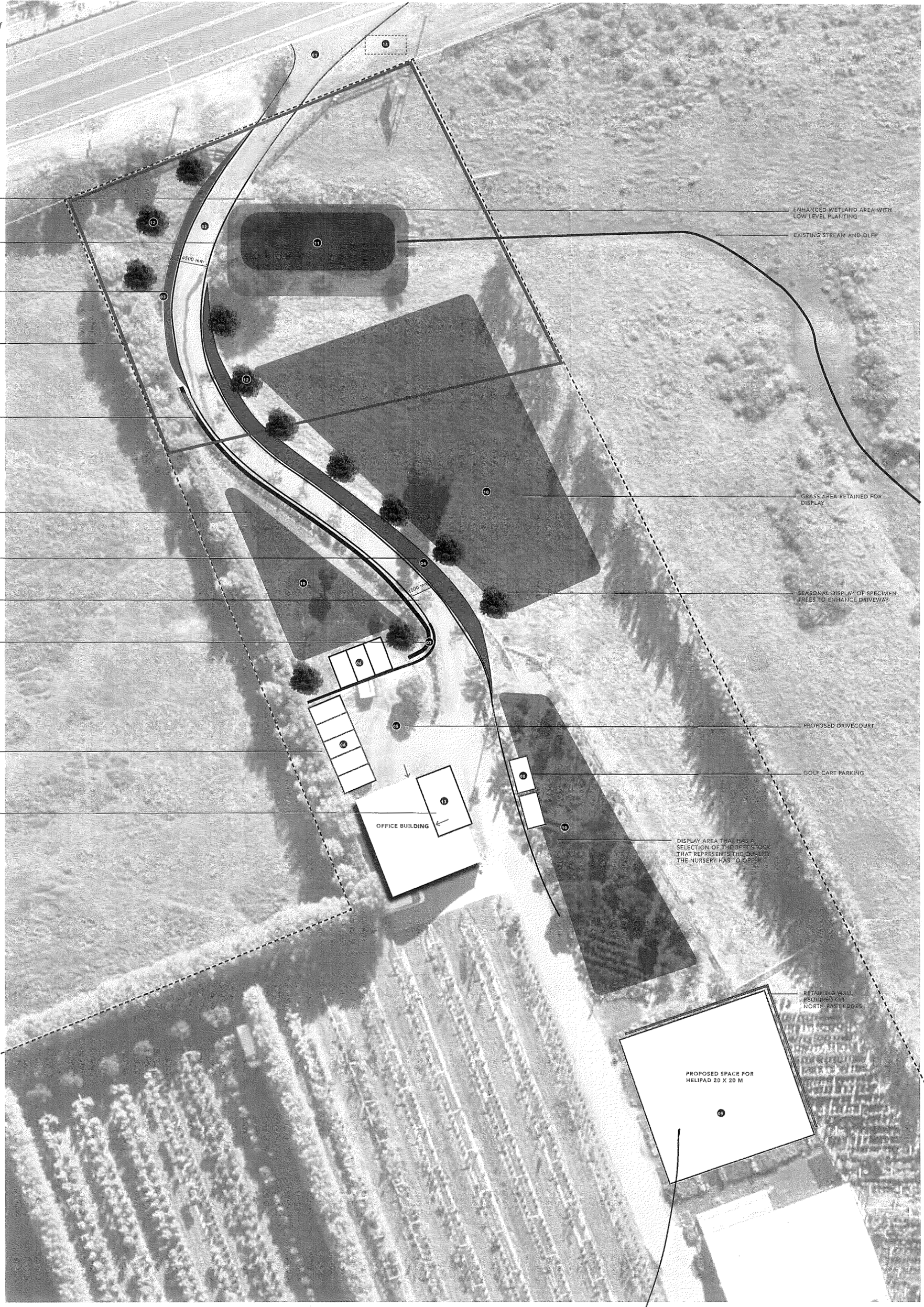
PROPOSED DRIVECOURT

GOLF CART PARKING

DISPLAY AREA THAT HAS A SELECTION OF THE BEST STOCK THAT REPRESENTS THE QUALITY THE NURSERY HAS TO OFFER

RETAINING WALL REQUIRES CARE NORTH-EAST EDGES

PROPOSED SPACE FOR HELIPAD 20 X 20 M



- Key
- - Site Boundary
  - 1 Existing site entry
  - 2 Existing driveway
  - 3 Proposed driveway widening 1200mm
  - 4 Proposed driveway widening 1500mm
  - 5 Driveway area
  - 6 Vehicle parking
  - 7 Re-aligned driveway and rock wall
  - 8 Golf cart parking
  - 9 Proposed area for Helipad 20 x 20m
  - 10 Tree display areas
  - 11 Wetland enhancement area
  - 12 Seasonal tree displays
  - 13 Landscape Courtyard
  - 14 New Blackbridge nursery signage



LANDSCAPE and ECOLOGY

To Big. Sent to Page 25 of 27

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

### Submitter details

Full Name or Name of Agent (if applicable)

Mr/Ms/Miss/Ms (Full Name)

Alan James Steele

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

436 Puhinui Rd, Manukau.

Telephone:

01 2781575; 021 2284508

Fax/Email:

alan@bbtrees.co.nz

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Notice of Requirement for Bus Rapid Transit - SH20/20B Interchange to Orrs Road

The specific parts of the above notice of requirement that my submission relates to are: (give details):

The proposal to close access from Puhinui Rd to 436 Puhinui Rd.  
The proposal to locate Rapid Bus Transit lane on South of Puhinui Rd (rather than continue it down centre of Puhinui Rd)

My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

The reasons for my views are:

That the legally granted access to the Nursery property / shop should be maintained.

The current proposal runs counter to our plans to maintain and upgrade this access. (See attached).

The through flow access has proved troublefree and beneficial to the nursery business and convenient to all visitors.

(continue on a separate sheet if necessary)


I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

To continue the bus transit lane down the centre of Puhinui Rd beyond the Price Rd intersection. To maintain access to 436 Puhinui Rd as shown in attachment.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 6/4/23.

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

**SUBMISSION ON NOTICE OF REQUIREMENT 4A – BUS RAPID TRANSIT  
SH20 – 20B INTERCHANGE TO ORRS ROAD**

**To:** Auckland Council

**And to:** Auckland Transport and Waka Kotahi

**Name of Submitter:** **Altrend Properties Limited**

**Introduction**

1. NoR 4a promoted by Waka Kotahi and Auckland Transport seeks to enable the construction, operation and maintenance for a widening of Puhinui Road between the State Highway 20-20B interchange and Orrs Road to provide for a bus rapid transit corridor, walking and cycling facilities and associated infrastructure.
2. Altrend owns 67 hectares of greenfields industrial land on the southern side of State Highway 20, comprising part of Precinct I432 in the Auckland Unitary Plan. State Highway 20 connects the Precinct with Auckland International Airport to the west and to Manukau City, the wider motorway network, and Botany to the east.
3. Altrend is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

**Submission**

4. Altrend accepts in principle that SH20 is to be widened and acknowledges that proposals have been under discussion for some time. Its principal concerns and conditional opposition relate to:
  - The proposed extent of the road widening.
  - The lack of detailed design available to support the extent of the widening.

- The potential effect of the designation and the works on consented stormwater infrastructure.
- The 15 year lapse period uncertainty as to when the works will commence.

### **Extent of widening**

5. Altrend has owned the subject land for 18 years. It was involved with other owners and Auckland Council in developing the Precinct Plan that was adopted by Auckland Council in 2016 as part of the proposed Auckland Unitary Plan process.
6. Altrend's plans had been predicated on a road widening of no more than 40 metres. The proposals subject to the NOR 4a extend up to 70 metres within the Altrend land.

### **Insufficient supporting information**

7. The information provided to date does not substantiate that a designation of the proposed width is *"reasonably necessary for achieving the objectives of the requiring authority"*. In particular, the lack of a full definition of the *"work"* raises concerns that in breach of the principles of the RMA the requiring authority is covering its options, ahead of properly defining any work that could be subject to analysis under the test imposed by section 171(1)(c) RMA.
8. Altrend is particularly concerned that some of its land may be intended to be used only temporarily during the construction period. That carries a risk that at some time in the future irregular or otherwise unusable severances may be offered, with disputes as to valuation created long after completion of development within the Precinct.
9. Imposition of the NOR and the consequential changes to Altrend's property boundary will inevitably result in changes to the Precinct Plan, requiring a consequential Plan Change to the AUP. Any changes to the Precinct Plan should be made against the background of certainty of AT/Waka Kotahi's intentions



given the possibility that buildout of the Precinct could precede commencement of the proposed works.

### **Stormwater issues**

10. Altrend has developed and has received consent for a system of stormwater ponds which would be affected by the NOR and any subsequent works. The requiring authorities could frustrate implementation of the existing consent. In the event that substitute proposals have to be developed, Altrend is concerned that the requiring authorities could further rely upon the NOR or the subsequent designation in a way that frustrated development of the Precinct.

### **Lapse period**

11. The proposed 15-year lapse period is unacceptable, particularly in the light of the requiring authority's apparent uncertainty as to its proposals. By styling the requirement as for "*route protection*" the requiring authority is making the landowners responsible for carrying the risks and part of the holding costs for the Auckland Transport and Waka Kotahi project. Subject to achieving greater certainty as to identifying the extent of the work "*reasonably necessary for achieving the objectives of the requiring authority*" Altrend would agree to the standard five-year lapse period for agreed works, subject to any extensions of the period being based on prompt acquisition of the necessary land subject to section 185 of the Resource Management Act 1991.
12. On the basis that until the required land is taken, it is functionally useless to Altrend as owner, full rates relief is sought.

### **Relief sought**

13. Altrend seeks the following relief:
  - Rejection of the notice of requirement; or

- Amendment of the notice of requirement to incorporate a draft outline plan showing the dimensions of the proposed works;
  - Approval by the requiring authorities to a modified stormwater system (if required) and prompt settlement of any injurious affection compensation claim arising;
  - Confirmation that the Altrend land will not be subject to any notice of requirement for temporary construction uses;
  - Imposition of a lapse period of 5 years.
14. Altrend desires to be heard and would welcome the opportunity for further consultation on design and acquisition issues.
15. Altrend seeks undertakings from the requiring authorities as follows:
- To negotiate in good faith for the prompt acquisition of any land approved to be taken for the purposes of providing a widened road corridor;
  - To provide full compensation for costs to the parties of amending the Precinct Plan to accommodate changes arising from the designation;
  - To provide full compensation for costs of redesign of the developments including redesign and relocation of all services.
  - To properly maintain the acquired frontage land pending its end use for road widening purposes.



**R E Bartlett KC**

*Counsel for Altrend Properties Ltd*

**Address for Service:**

R E Bartlett KC  
Shortland Chambers  
Level 13, 70 Shortland Street  
Auckland 1010

PO Box 4338  
Auckland 1140

[bartlett@shortlandchambers.co.nz](mailto:bartlett@shortlandchambers.co.nz)

09 307 9827

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:453] Notice of Requirement online submission - Avisha Mohanlal  
**Date:** Monday, 10 April 2023 11:00:38 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Avisha Mohanlal

Organisation name:

Full name of your agent:

Email address: [avisha.mohanlal@gmail.com](mailto:avisha.mohanlal@gmail.com)

Contact phone number: 098276146

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the road means a loss of land from my property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has a lot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water line can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening doesn't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to an increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend for AT to have a look at other options with the current road system. This could be making roads one-way, increase the number of traffic signals for better flow of vehicle. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 10 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:502] Notice of Requirement online submission - Avisha Mohanlal  
**Date:** Tuesday, 11 April 2023 10:45:14 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Avisha Mohanlal

Organisation name:

Full name of your agent:

Email address: amoh744@aucklanduni.ac.nz

Contact phone number:

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the road means a loss of land from my property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has alot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend AT to have a look at other options with the current road system. This could be making roads one-way, increasing the number of traffic signals for better flow of vehicles. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 11 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:503] Notice of Requirement online submission - Avisha Mohanlal  
**Date:** Tuesday, 11 April 2023 11:00:09 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Avisha Mohanlal

Organisation name:

Full name of your agent:

Email address: AvishaM@douglas.co.nz

Contact phone number:

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the road means a loss of land from my property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has alot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend AT to have a look at other options with the current road system. This could be making roads one-way, increasing the number of traffic signals for better flow of vehicles. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 11 April 2023



**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:456] Notice of Requirement online submission - Minakshi Mohanlal  
**Date:** Monday, 10 April 2023 11:15:41 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Minakshi Mohanlal

Organisation name:

Full name of your agent: Avisha Mohanlal

Email address: minakshi.mohanlal@gmail.com

Contact phone number: 098276146

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the road means a loss of land from my property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has a lot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend AT to have a look at other options with the current road system. This could be making roads one-way, increasing the number of traffic signals for better flow of vehicles. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 10 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

**SUBMISSION ON NOTICE OF REQUIREMENT 4A: BUS RAPID TRANSIT –  
SH20/20B INTERCHANGE TO ORRS ROAD (AUCKLAND TRANSPORT)**

**To: Auckland Council**

**Name of submitter: New Zealand Storage Holdings Limited**

**Introduction**

- 1 This is a submission on one of five notices of requirement from Auckland Transport and Waka Kotahi New Zealand Transport Agency (*Waka Kotahi*) related to connections between the major centres of Botany, Manukau, Auckland Airport and the surrounding areas (*the Project*).
- 2 Notice of requirement 4a is sought by Auckland Transport to enable the construction, operation and maintenance of an extension to Puhinui Road between the State Highway 20 / 20B Interchange and Orrs Road to provide for a Bus Rapid Transit corridor, walking and cycling facilities and associated infrastructure (*NoR 4a*).
- 3 New Zealand Storage Holdings Limited (*NZSHL*) received notice of this, and adjacent notice of requirement 4b: Alteration to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport (Waka Kotahi NZ Transport Agency) (*NoR 4b*).
- 4 NZSHL owns and operates business activities from land located within the boundaries of NoR 4a, as identified in **Appendix A**.
- 5 NZSHL is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

**Submission**

- 6 NZSHL generally opposes NoR 4a to the extent that it does not adequately address effects on NZSHL's land, and its ability to access, develop and operate its business activities on the land. NZSHL opposes the notice of requirement because it would not:
  - (a) promote the sustainable management of physical resources, including enabling people and communities to provide for their health and safety, and their social, economic and cultural well-being;
  - (b) promote the efficient use and development of physical resources;
  - (c) ensure consistency with good resource management practice; and

(d) does not adequately manage adverse effects on the environment.

- 7 Without limiting the generality of the above, the specific reasons for NZSHL's opposition include (but are not limited to):

*Project uncertainty*

- (a) Uncertainty surrounding the timeframe for construction of the Project. NZSHL acknowledges that notices of requirement can be used as a planning tool for route protection;<sup>1</sup> however, this purpose must be balanced against the prejudicial effects to directly affected property owners who are required to endure blighting effects on their properties for an indeterminate period.<sup>2</sup> In this case, Auckland Transport has confirmed that:<sup>3</sup>

The implementation timeframe for the Project is yet to be confirmed and is subject to funding. To enable an assessment of the potential effects of the Project on the environment, the assumed construction start date is 15 years away.

- (b) NoR 4a applies to a significant portion of NZSHL's landholding at 408 Puhinui Road, and the entirety of 402 Puhinui Road, as illustrated in Appendix A.
- (c) NZSHL is currently developing its land in accordance with approved resource consents and the Puhinui Precinct provisions and, in conjunction with Altrend Properties Limited and Tunicin Investments Limited, is in the process of obtaining resource consents for the development of a four-way intersection at the current Manukau Memorial Gardens access intersection with Puhinui Road.
- (d) The Puhinui Precinct applies to the entirety of the business zoned land to the south of State Highway 20B and enables a transition from traditional rural activities to urban development, across a number of large land-holdings.
- (e) The extent of NoR 4a is greater than the 40m set-back, including 10m landscaping yard for accommodation of the Puhinui Heritage Gateway,<sup>4</sup> that already applies to NZSHL's land to provide for future possible transport requirements in accordance with the Puhinui

<sup>1</sup> *Quay Property Management Limited v Transit New Zealand* Environment Court Decision W28/2000, at [123].

<sup>2</sup> *Beda Family Trust v Transit New Zealand* A139/2004, at [112].

<sup>3</sup> Airport to Botany Assessment of Effects on the Environment, December 2022, Volume 2, page 34.

<sup>4</sup> Noting that the NoR additionally does not appear to recognise or make provision for this 10m landscape yard.

Precinct provisions.<sup>5</sup> The potential effects of NoR 4a on NZSHL's landholdings are therefore additionally onerous.

- (f) NZSHL acknowledges the importance of the successful delivery of roading infrastructure to service future development within the Precinct. However, NZSHL wishes to ensure that necessary upgrades to infrastructure in the vicinity of the Precinct are progressed in a way that enables affected landowners to plan the development of their land with confidence. NZSHL considers that the uncertainty created by having land subject to a notice of requirement for an indeterminate period of time to be unacceptable from a business perspective and not in accordance with good resource management practice.
- (g) In these circumstances, NZSHL considers it premature to apply a designation to its land, particularly with the lapse date requested and at the width sought, when the timeframe for detailed design, funding, landowner engagement and Public Works Act 1981 acquisition processes, and ultimate commencement of the Project, is uncertain.

#### *Vehicle access*

- (h) It is unclear what effect NoR 4a will have on the existing vehicle access from SH20B to NZSHL's land. The assessment of transport effects submitted in support of NoR 4a states that "no significant changes are proposed to individual property access other than changes to the access layout".<sup>6</sup>
  - (i) However, as shown on the extract from the NoR 4a General Arrangement Plan in **Appendix B**, the proposed bus rapid transit corridor, walking and cycling path alignment, and road berm runs directly in front of the existing access to NZSHL's land. NoR 4a is therefore ambiguous as to how the existing vehicle access to NZSHL's land will continue to be provided.
  - (j) In that context, NZSHL is interested to ensure that appropriate access continues to be maintained to its landholdings and considers that further assessment and information on this matter is required.
- 8 Accordingly, NZSHL seeks the following recommendation from Auckland Council:
- (a) reject the notice of requirement; or

<sup>5</sup> I432.6.3 Table 2, Puhinui Precinct, Auckland Unitary Plan – Operative in Part.

<sup>6</sup> Te Tupu Ngātahī, Supporting Growth: Airport to Botany – Assessment of Transport Effects, December 2022, Version 1, page 110 at 10.4.4.1.

(b) alternatively amend the notice of requirement to give effect to the concerns raised in this submission.

9 NZSHL wishes to be heard in support of its submission.

**DATED** this 11<sup>th</sup> day of April 2023



Francelle Lupis, counsel for New Zealand Storage Holdings Limited

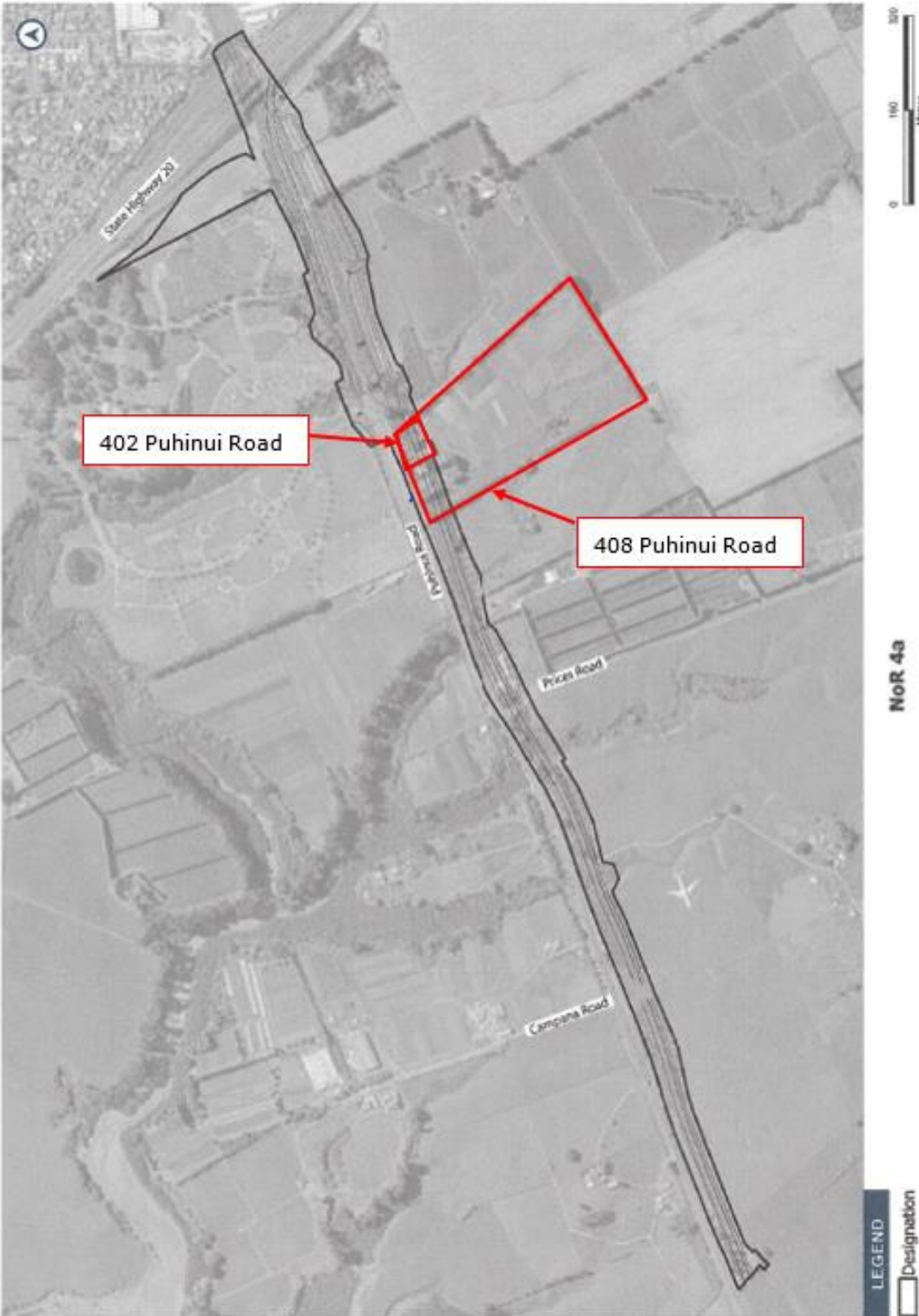
**Address for Service:**

Francelle Lupis  
Greenwood Roche  
Level 6, Hayman Kronfeld Building  
15 Galway Street  
Auckland 1010

francelle@greenwoodroche.com  
Ph 306 0495

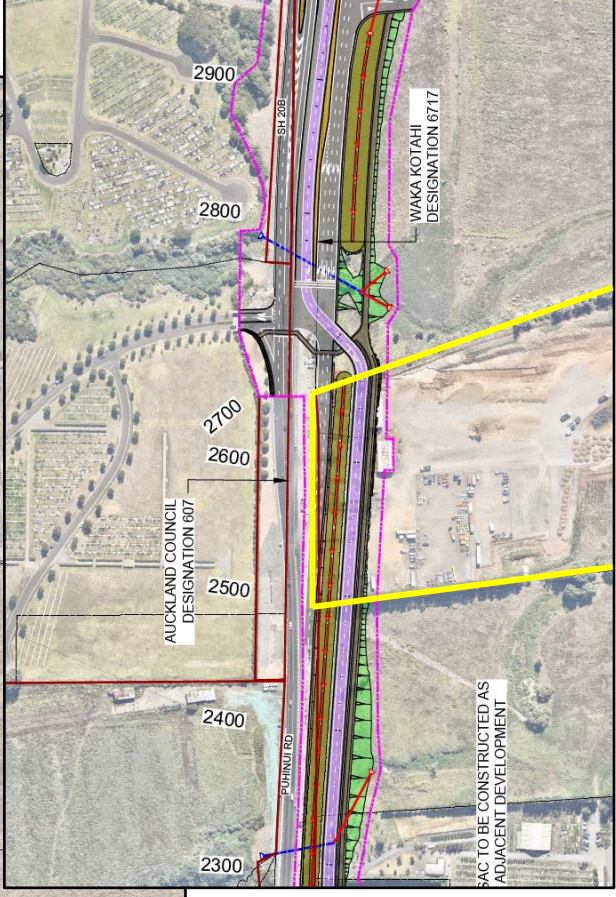
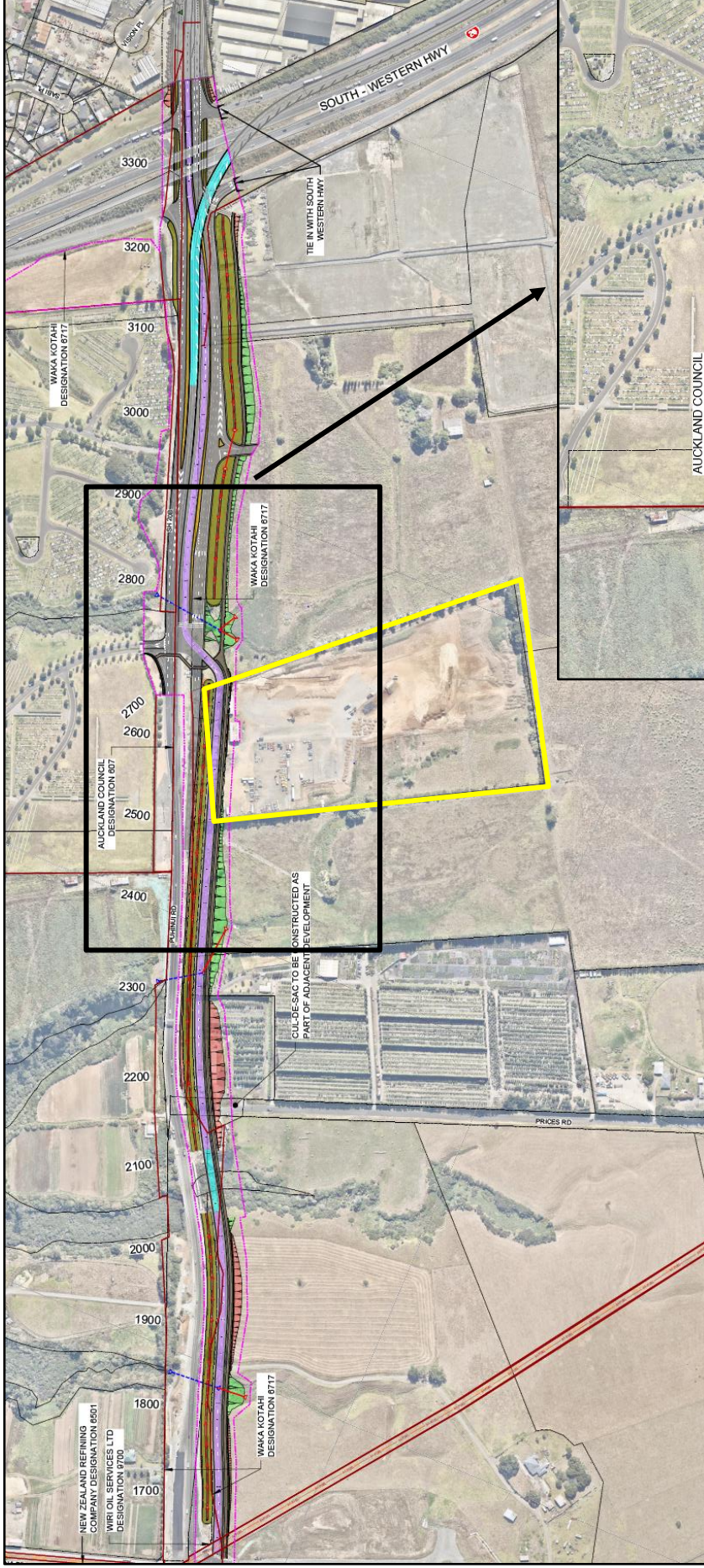
Appendix A

Map 2: Overview of NoR 4a and proposed designation boundary





Appendix B



LEGEND GENERAL		LEGEND STORMWATER		LEGEND EXISTING UTILITIES	
	CONTROL LINE AND CHANGE		PROPOSED RETAINING WALL		FIRST GAS PIPELINE
	EXISTING PROPERTY BOUNDARY		PROPOSED BUS RAPID TRANSIT STATION		FIBRE OPTIC
	OTHER DESIGNATIONS		PROPOSED BUS RAPID TRANSIT CORRIDOR		FUEL PIPELINE
	PROPOSED DESIGNATION BOUNDARY		PROPOSED BRIDGE		WATERMAIN
	PROPOSED ROAD CORRIDOR		PROPOSED HERITAGE		WASTEWATER
	PROPOSED FOOTPATH		NOTABLE TREE		OVERHEAD LINES
	PROPOSED CYCLEWAY		EXISTING CULVERT		TRANSPOWER PYLON
	PROPOSED BERM		EXISTING TREATMENT POND		
	PROPOSED FLUSH MEDIAN				
	RAISED MEDIAN OR TRAFFIC ISLAND				
	FILL BATTER				
	CUT BATTER				

**SUBMISSION ON NOTICE OF REQUIREMENT BY AUCKLAND TRANSPORT  
FOR  
BUS RAPID TRANSIT - SH20/20B INTERCHANGE TO ORRS ROAD**

**To:** Planning Technician  
Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Via email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Submitter:** Wiri Oil Services Limited (*WOSL*)  
149 Roscommon Road  
Wiri  
Puhinui 2104

**Address for Service:**

4Sight Consulting Limited  
201 Victoria St West  
PO Box 911310, Victoria St West,  
**AUCKLAND 1142**

Attention: Georgina McPherson  
Phone: 021 0244 3961  
Email: [georginam@4sight.co.nz](mailto:georginam@4sight.co.nz)

**Counsel Acting:**  
Rob Enright  
Magdalene Chambers  
Tāmaki Makaurau, Wānaka

e: [rob@publiclaw9.com](mailto:rob@publiclaw9.com)  
m: 021 276 5787

## A. Introduction

1. This submission has been prepared on behalf of Wiri Oil Services Limited (*WOSL* or *the Submitter*). WOSL operates a bulk hazardous substances storage terminal and distribution facility at 149 Roscommon Road, Wiri (*the Terminal*). The Terminal receives refined oil products, namely petrol, diesel and aviation fuel from Channel Terminals Ltd at Marsden Point via the designated Ruakaka to Auckland Pipeline (*RAP*)<sup>1</sup>. The RAP is approximately 170km long and transmits approximately 2.4 billion litres of petroleum annually. The Terminal currently supplies just under half of New Zealand's fuel supply. This includes approximately 1 billion litres per annum of jet A1 aviation fuel, supplied to Auckland International Airport through a dedicated 6.9 km underground pipeline, being the Wiri to Airport pipeline (*the WAP* or *the pipeline*). The WAP solely and continually carries jet fuel from the terminal to the Airport and is currently designated for some of its length in the Auckland Unitary Plan. The WAP is owned and operated by WOSL.
2. The route of the WAP is as illustrated in **Figure 1** below. The WAP crosses under Puhinui Road in the vicinity of Campana Road and intersects with Auckland Transport's (*AT's*) proposal to widen Puhinui Road in this location.

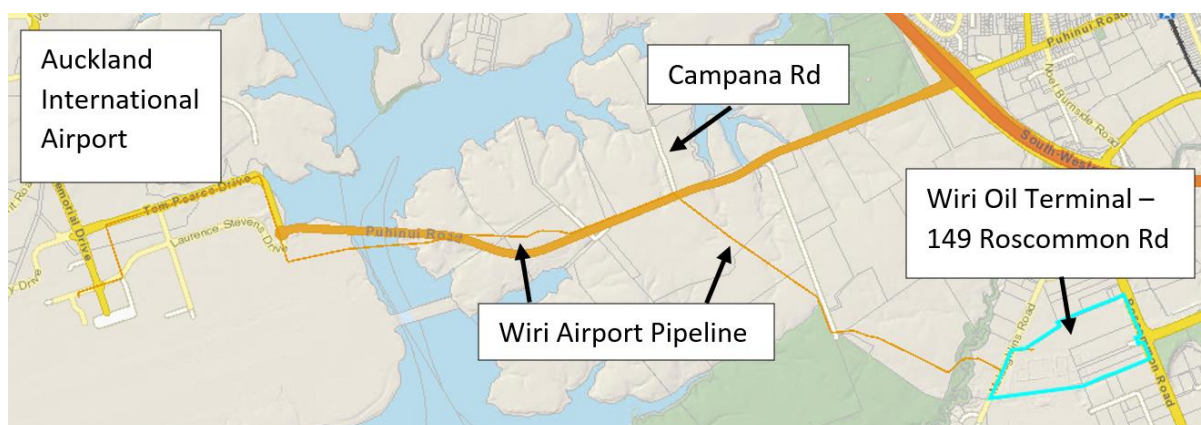


Figure 1: Wiri Airport Pipeline (Source: Auckland Council Geomaps)

3. WOSL is a Requiring Authority under s167 of the Resource Management Act 1991 in respect of both the Terminal and the WAP. WOSL is also a lifeline utility under the Civil Defence Emergency Management Act 2002. The Terminal and the RAP/WAP are nationally and regionally significant infrastructure assets which are of vital importance to the New Zealand economy. They support productivity and economic growth and provide secure and affordable energy for the nation's consumers.
4. The Terminal is the only bulk facility storing and supplying fuel to the greater Auckland region and is an essential part of the national network for the distribution and transmission of petroleum throughout the upper North Island. Any disruption to the petroleum supply chain would have a major impact on public welfare and economic activity and WOSL seeks to ensure

<sup>1</sup> The RAP is owned, operated and designated by Channel Terminals Ltd.

any actual and potential adverse effects on the WAP of the works proposed by AT are appropriately avoided, remedied and mitigated.

5. WOSL has an existing designation over the WAP, included as designation reference 9700 in the Auckland Unitary Plan. The primary purpose of the designation is to ensure security of supply of jet fuel between the Terminal and the Auckland International Airport. The designation seeks to protect the WAP from incompatible development by requiring the consent of WOSL before any activity is undertaken within the designation area and by placing restrictions on activities such as the disturbance of land, finished levels and surfaces, vegetation planting and structures in and around the pipeline designation. The designation also provides for the ongoing operation, maintenance, repair, renewal and replacement of the WAP by WOSL.
6. It is noted that the WAP is co-located with the designated RAP for much of its length (between Campana Road and the terminal), including where the pipelines cross under Puhinui Road in the location affected by AT's proposed NOR.

#### **B. WOSL's Submission**

7. Auckland Transport (AT) is proposing to designate land to enable the widening of Puhinui Road between the SH20/20B Interchange and Orrs Road (NOR 4a). The purpose of the NOR is to provide for the establishment and operation of a dedicated Bus Rapid Transit (BRT) corridor and improved walking and cycling facilities to support Airport to Botany transport improvements.
8. WOSL is neutral as to whether or not the NoR is approved. However, if it is approved WOSL seeks to ensure the proposed works do not affect the ongoing operation, maintenance and upgrading of the WAP or unduly restrict access to the WAP either during construction or on completion of the project.
9. The NOR Application (*the Application*) includes a plan which depicts the proposed location of the works associated with NOR 4a. The upgrades are shown to occur on the southern side of Puhinui Road and for the most part do not fall within the designated WAP corridor, except for a section opposite Campana Road where the proposed BRT, footpath, and cycleway intersects with the WAP. Refer to **Figure 2** below.

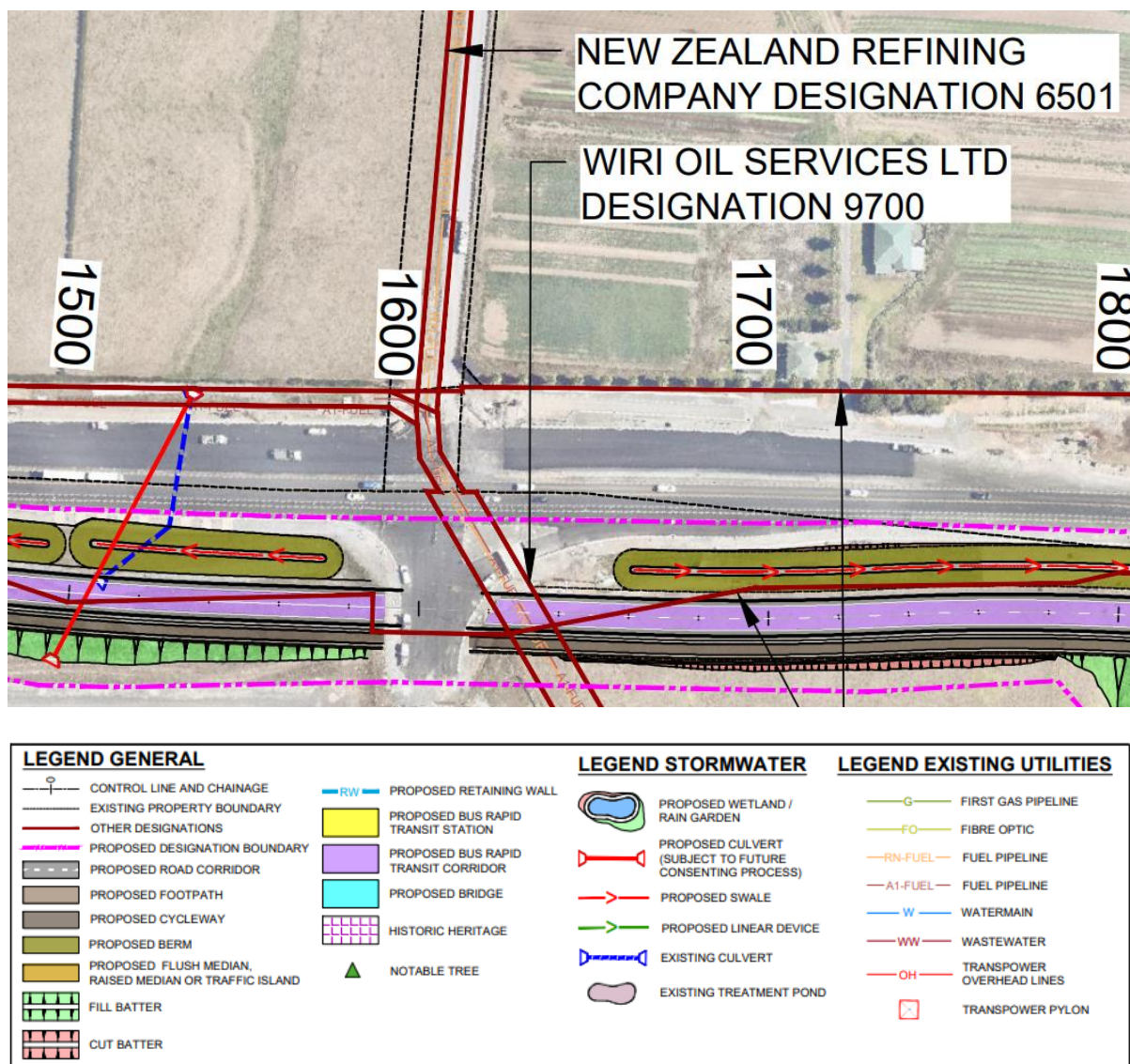


Figure 2: Excerpt from General Arrangement Layout Plan – NoR 4a (not to scale)

10. The layout appears to minimise the extent of works proposed in the vicinity of the designated WAP corridor and this is supported.
11. Section 7.2 of the Assessment of Environmental Effects (AEE) accompanying the NoR identifies that a number of alternative corridor alignment options were investigated during preparation of the current proposal, including options involving road widening to the north of Puhinui Road and/or potential realignment of the WAP. Such options are likely to have significantly more impact on the WAP than the option currently proposed and WOSL would oppose any move to revisit the corridor alignment or introduce additional activities into the area currently designated for the purposes of the WAP.
12. The AEE appropriately identifies the presence of the existing WAP pipeline designation and AT’s obligations for obtaining WOSL’s written approval under s177 of the RMA prior to undertaking any work. The AEE also identifies that the written approval of requiring authorities, including WOSL, will be sought during the detailed design stage of the Project, rather than as part of the current process of designating the land.

13. WOSL supports this approach and notes the likelihood that as part of that process WOSL will require AT to enter into an agreement setting out an agreed approach to undertaking works within WOSL's WAP pipeline designation to ensure the integrity of the WAP at all times and its continued safe operation and maintenance. This will ensure detailed design matters such as construction approaches and methodologies appropriately take into account the presence of the WAP and can be reviewed and approved by WOSL prior to the commencement of works.
14. In addition, and as part of the current NoR process, consultation has been undertaken with requiring authorities, including WOSL. The Application proposes a condition to require the preparation of a Network Utilities Management Plan (*NUMP*), in consultation with the relevant network utility operators. The Application identifies that the NUMP will provide a framework for protecting, relocating and working in proximity to existing network utilities, and it will address matters such as accessibility to assets and compliance with relevant standards, such as AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.
15. WOSL supports the proposal to prepare a NUMP addressing the management of works in proximity of network utilities and notes that this should also take into account the specific measures set out in WOSL's WAP designation for undertaking works in and around the WAP.

### **C. Relief Sought**

16. In the event that NoR 4a proposed by AT is confirmed, WOSL seeks to ensure the proposed works are undertaken in a manner that appropriately takes account of and includes measures to address the safety, integrity, protection of and access to WOSL's WAP pipeline. This includes, but is not limited to the following:
  - a. Retain the NoR corridor alignment as currently proposed;
  - b. Include a designation condition requiring the preparation of a NUMP that addresses, at a minimum, the following matters:
    - i. Consultation with WOSL in the preparation of the NUMP;
    - ii. Physical and legal access to the WAP during works including for maintenance and or emergency works;
    - iii. Measures to ensure the protection of the WAP including adherence to the minimum requirements set out in WOSL's WAP designation 9700 as well as AS/NZS 2885 Pipelines – Gas and Liquid Petroleum and AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines.
    - iv. Identification of the methods AT will use to liaise with other requiring authorities affected by AT's NoR, including in relation to seeking requiring authority approvals for works where their assets are affected.
  - c. Include a designation condition confirming the relationship between existing designations and the proposed NoR, including that network utility operators with existing infrastructure located within the proposed designation will not require written consent of AT under section 176 of the RMA for activities undertaken in accordance with their own designations, including the following activities:

- Operation, maintenance and repair works;
  - Minor renewal works to existing network utilities necessary for the on-going provision or security of supply of network utility operations;
  - Minor works such as new service connections; or
  - The upgrade and replacement of existing network utilities in the same location with the same or similar effects as the existing utility.
- d. AT to undertake further consultation with WOSL during the detailed design process in order to obtain WOSL’s requiring authority approval for works in the designated WAP corridor, including entering into any agreements as required by WOSL to ensure the integrity of the WAP at all times and its continued safe operation and maintenance.
- e. Any other relieve required to give effect to the issues raised in this submission.
17. WOSL wishes to be heard in support of this submission.
18. If others make a similar submission, WOSL would be prepared to consider presenting a joint case with them at any Hearing.
19. WOSL could not gain an advantage in trade competition through this submission.
20. WOSL is directly affected by an effect of the subject matter of the submission that:
- a. Adversely affects the environment; and
  - b. Does not relate to trade competition or the effects of trade competition.

Signed for and on behalf of WOSL as authorised signatory.



.....

Georgina McPherson  
**Principal Planning and Policy Consultant**  
**4Sight Consulting Ltd**

Dated this day of 11 April 2023

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Notice of Requirement for Bus Rapid Transit - SH20/20B Interchange to Orrs Road

The specific parts of the above notice of requirement that my submission relates to are: (give details):

My submission is:

- I or we support of the Notice of Requirement
- I or we are neutral to the Notice of Requirement
- I or we oppose to the Notice of Requirement

The reasons for my views are:



(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

Empty lines for providing details of the recommendation or decision.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

*Henry Lock*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

## Construction Effects

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs for construction of BRT project. Some of the construction effects (e.g., noise, dust and vibration) will be significant. Not all mitigation measures mentioned in the documentation are sufficient.

### Reasons for Submission:

The NoR documentation notes that once detailed design has occurred, the construction phases of the project will vary between 3-6 years.

Some of the construction effects (e.g., noise, dust and vibration) will be significant. Three to six years is a *long* time. Some of the effects of road construction and maintenance along Puhinui Road (e.g., the Watercare Hunua water main, the construction of existing bus lanes) resulted in significant disruption. It became unpleasant to live in the area. But we always knew the time period would be relatively short. In neither case did it take *years*.

The Assessment of Environmental Effects (p.93) notes the noise of construction will be temporary. But temporary does not mean short.

Some of the noise effects are *significant*. Loud noise, significant vibration, etc.

There seem to be some mitigation measures in place, particularly for sensitive activities. There is the opportunity for short-term respite and relocation in certain circumstances. Reading the conditions for such relocation, suggests to me that it is going to be quite a difficult process to prove the need for such measures. Once again, our community is neither a highly literate nor litigious one. There are social, educational and economic barriers to effective involvement and self-advocacy.

I would like to see AT providing one-on-one assistance for applying for such mitigation measures (similar to the Friends of the Submitter programme, but locally based).

I would also like to see AT providing other support – for example, if a family needs to temporarily relocate due to the effects of construction, they should not be materially disadvantaged by things like the cost of taking their children to school from where they are staying outside the affected area.

Another example of AT providing other support could be temporary relocation to vacant office space where people work from home and their work days are disrupted by the effects of noise and vibration.

I would also appreciate AT, at the design stage of the project, carefully re-assessing the potential effects of noise, vibration, etc., and monitoring them during construction. I would

like to see more effort put into looking at alternatives to mitigate the effects, such as technology advances, rather than just looking at means such as limiting the operational time windows when active construction is taking place.

Once again, this is a high-needs community that is not used to interacting with big, powerful organisations such as AC and AT. I reflect on how differently a community such as Remuera might respond to such a transport proposal, with significant construction effects on properties for up to six years.

Our community is strong, but it is not immune to the effects of stress. I would hate to see issues such as domestic violence, anxiety and depression rates increasing in an already vulnerable area as a result of a transport project which will give that community negligible positive benefits in the future. Indeed, it is likely to be left with ongoing negative impacts (e.g., noise, dust, visual) even once the BRT is operational.

#### **Seek recommendations:**

- I would like to see AT providing one-on-one assistance for applying for mitigation measures such as relocation opportunities (similar to the Friends of the Submitter programme, but locally based).
- I would also like to see AT providing other, associated financial support – for example, if a family needs to temporarily relocate due to the effects of construction, they should not be materially disadvantaged by things like the cost of taking their children to school from where they are staying outside the affected area.
- I would like AT to provide support to those residents who work from home and are impacted by construction noise (e.g., temporary hire of vacant office spaces away from the affected area).
- I would also appreciate AT, at the design stage of the project, carefully re-assessing the potential effects of noise, vibration, etc., and monitoring them during construction. I would like to see more effort put into looking at other alternatives to mitigate the effects, such as technology advances, rather than just looking at means such as limiting the operational time windows when active construction is taking place.

## Effects on local roading network

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on local roads near the BRT route

### Reasons for Submission:

#### Traffic on streets surrounding the BRT route

The documentation for the BRT notes that there will be traffic impacts on surrounding streets that are in close proximity to Puhinui Road and other roadways along the length of the BRT. People will attempt to avoid the congestion caused by construction of the BRT on the main route, by driving in surrounding streets. The residents of these streets will not be accustomed to these volumes of traffic. AT needs to consider how to best manage this through road management practices on those roads, and mitigation of vehicle noise for residents of these streets.

In addition, as residents along the BRT will now only be able to turn left out of their driveways, they will have to drive on these surrounding streets to get to their destinations. The NoR documentation notes in a number of places, that having to turn left out of a driveway and go around the block to get to a destination will add approximately 2.5km to each journey. Assuming people would then return to their homes afterwards, this would add approximately 5km to each trip away from home. When considering this, and adding it all up, an effect of this aspect of the BRT proposal will be more vehicle kilometres travelled and, therefore, more pollution emitted from vehicles. It will also cost residents more over time in fuel and vehicle maintenance.

In order to mitigate these effects, AT should look at compensating for the extra cost to residents with financial compensation. It should also look at how it can mitigate the effect of the increased pollution that will be caused – for example, by using the left-over land that is acquired for the designation, as a ribbon park with plentiful tree planting to offset the increased emission of greenhouse gases caused as a result of the need for people to add 5km of vehicle use per return journey from their homes.

#### Noel Burnside Ave

I note that the current entrance to SH20 at the intersection of Puhinui Road and the state highway will be closed. The NoR documentation notes this will put added traffic onto Noel Burnside Ave. This is already an extremely busy street. The recent changes to the configuration of lanes in the vicinity of the Noel Burnside/Puhinui/Wyllie Road intersections have led to significant traffic delays as vehicles navigate a short length of Puhinui Road to get from Noel Burnside to Wyllie and vice-versa. This will only be exacerbated with Noel Burnside Ave becoming busier as the main way for cars to get to SH20 from the surrounding area.

This aspect of the roading design needs some detailed consideration and a re-look at the potential impacts and practicality of putting Noel Burnside Ave in this position as a major through-link.

#### Pedestrian linkages across BRT

Various maps in the NoR documentation show arrows where it is expected that there will be pedestrian access across the BRT (e.g., near Puhinui School, and the Puhinui Road shops at the end of Ranfurly Road). In the Assessment of Traffic Effects (p.91) 'cross walks' are mentioned. Elsewhere in the NoR documents, 'at grade' crossings are mentioned (i.e., underpasses or bridges).

I imagine that cross-walks will not help to achieve the rapid transit of buses if signalised pedestrian crossings are put in place. Underpasses are probably not ideal (both in terms of safety and the fact that Puhinui Road has a number of major services tunneled underground along its length, such as gas and water). Bridges for pedestrians will require the acquisition of more land than has been shown in the documentation. For example, near the Puhinui Road shops, if a pedestrian bridge is built at the location shown on the map, it would necessitate the removal of some of the shops to allow for a ramp or stairs to access such a bridge.

In the detailed design phase of the project, AT should work with the community to identify the best ways and locations to provide pedestrian linkages across the BRT route.

#### **Seek recommendations:**

- That AT put appropriate traffic management practices in place in surrounding streets to avoid them becoming 'rat races' due to construction of the BRT, and consider how best to mitigate the effects of increased traffic noise on residents of these streets
- That AT provide compensation to land-owners who will only be able to turn left out of their driveways along Puhinui Road as a result of the BRT route.
- That AT mitigate the effect of increased vehicle use by residents who have to drive around the block to overcome the fact they can only turn left out of their driveways, by planting trees. Ideally in a ribbon park created using left-over land acquired but not used for the purpose of the designation.
- That AT further consider and report back on the ongoing operational role of Noel Burnside Ave once the link from Puhinui Road to SH20 is removed.
- That AT assess and report in more detail on the proposed linkages for pedestrians across the BRT

## Engagement

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Engagement with affected land owners in the lead-up to the lodgment of the NoRs has been poor.

Notification about the NoRs to affected and impacted land owners has been poor.

Communication during detailed design and construction phases needs to be done better than engagement carried out with residents to date.

### Reasons for Submission:

I realise that AT as the requiring authority didn't have to engage with the affected community prior to lodging the NoRs (S.36A RMA) but it is generally seen as good practice to do so. In my own experience as a planner at Auckland City Council (admittedly over twenty years ago now), it certainly makes it easier in the long run if you can bring a community along with you when planning a major planning or infrastructure project.

In the case of the Airport to Botany Rapid Transit project, AT and SG have made some attempts to engage. There are two weighty documents that outline their community engagement efforts (see Appendix A to this submission). However, when you dig down into the depths of these documents, to see what *actual* efforts were made to engage with the people likely to be *directly affected* by the route, the efforts were not satisfactory in my view.

I also realise that the engagement efforts of AT and SG will not 'make or break' the decision of whether the designations are approved. However, I'd like to think that what I say in this submission will be taken into account. It will definitely have had a major impact on the number of submissions received, and the understanding people have about the actual potential impacts of the project if constructed.

#### Engagement prior to lodging NoRs

Appendix A to this submission is my presentation to the Ōtara-Papatoetoe Local Board Meeting on 6 December 2022. It specifies the prior engagement that was carried out that specifically targeted people who might be directly impacted by the BRT designation.

Essentially, it boils down to:

- Unaddressed flyers dropped in letterboxes, delivered folded up in a bunch by the same people who drop off the unsolicited 'junk mail'
- Opportunities to talk to AT/SG staff at Manukau Westfield on two occasions and outside Papatoetoe New World on one occasion

- Letters addressed to residents in July 2022 which did not specify the scale or potential impact of the proposed route
- Letters to residents who are directly impacted by land acquisition either in whole or in part in August 2022 with an invitation to meet with SG staff
- Meetings with SG staff where owners of individual properties were told more about the potential impact on their land. For many, this was the first time they realised the extent of the impact to them personally. SG staff made it clear they could not give a map showing the entire route due to privacy reasons and that they could only talk to landowners about their own individual properties.

When we study the information sent to residents in the flyers, and even the information presented to local boards, the route shown was a generalised blue line along Puhinui Road, with absolutely no indication of the scale, including the plan to build a bridge to link with the Puhinui Train Station, and to realign the route to go through all the houses on the southern side of Puhinui Road from Clendon Ave on past Plunket. There was also no reference with the location of the blue line, to the impact on Kenderdine Road, Bridge Street and Cambridge Terrace. In addition, the only real route 'options' that people were asked to comment on in these flyers involved which streets within Manukau Central would have the BRT route. There were no clear opportunities that I can find information on where potentially impacted people were targeted to be invited to have *meaningful* input to which other routes (e.g., not using Puhinui Road at all) were being assessed.

We are also concerned that as the flyers were delivered, not in envelopes, and not individually addressed, they may well have gone un-noticed folded up in the 'junk mail' many of us put straight in the recycling bin.

When we drilled down into the type of consultation that occurred at the New World and Westfield Manukau information sessions, people were asked generalised questions designed to get standardised answers. They were offered the opportunity to write short comments and place them on maps with post-it notes. The route 'options' presented were few.

When we tried to get further information from SG staff about the other properties affected by the proposed route, we were continually rebuffed, with privacy issues cited. My husband and I went door-knocking up and down the street, trying not to look like we were selling vacuum cleaners, to see talk to other residents about the impact on their properties. We were floored to find that some people had not even received a letter, and thus were completely unaware of the project. (Including a property badly affected by the 2021 tornado – the old house was demolished and there is currently a brand-new two-storey home being built on the site at 182 Puhinui Road – you can imagine the shock and consternation of the land owner who was given consent to build on a property about to be affected by an acquisition under an NoR!)

It was not until late in the piece, after repeated requests from Arena Williams, our local MP, that AT/SG staff came to a meeting outside the Puhinui Train Station and unrolled a map so people could see the actual extent of the proposed NoR.

Digging into the engagement documents from AT/SG, I was surprised to see that residents associations in far-flung areas such as Wattle Downs, had been engaged with, but not the people likely to be directly affected by construction of the BRT route.

The SIA Appendix B, Summary of Engagement, mentions that there were interviews undertaken with stakeholders including private property owners. The document only notes conversations with one business owner from the shops adjacent to Ranfurly Road, and the opinion piece written for and published in the *NZ Herald* by Mr Ali Shakir who lives at the Botany end of the BRT corridor. The first section of the Summary notes that, "*Not all stakeholders were able to participate in the SIA or were able to complete the Social Impact Assessment Process.*" I would like to know how the particular stakeholders and groups were identified, and why, for the entirety of the route from the airport to Botany, only two 'private property owners' were interviewed.

The Summary goes on to say that "*We identified advocacy groups, social enterprises, and other groups representing community interests and business and community networks and contacted them.*" I would like to know if any were in the area most affected by property acquisition. The voluntary surveys carried out, and the meetings with groups noted in the Summary show *no* groups directly linked to the area most affected by property acquisition. The groups noted in the Summary were:

- *Chinese community in Botany Downs, Botany Junction, Flat Bush, Dannemora and Ormiston with a focus on older people and youth;*
- *The Fijian Indian community in Flat Bush, Ormiston, Clover Park and the Airport Precinct;*
- *The Pasifika community in Otara, Clover Park, Wiri, Flat Bush, Manukau City Centre and Ormiston, age groups 18-49; and*
- *Residents in the Flat Bush and Ormiston area.*

None of these groups are located or representative of people living in Papatoetoe, particularly Puhinui Road, or in the vicinity of land to be taken around Bridge Street. This does not seem like an SIA that was carried out with the intention of actually getting honest input from affected landowners.

Social Impact Assessment engagement interviews were carried out with the Puhinui Medical Centre and Puhinui School. These interviews were focussed very much on the impact of the project on business and access. Neither the school nor the medical centre are facing property acquisition. In addition, it is unclear *when* these conversations took place, and whether the true impact of expected housing intensification has been taken into account in discussions on, for example, expected roll growth in the future. In addition, were those at the school made fully aware of the extent of the BRT route and its infrastructure and the fact it will, essentially cut the school off geographically from most of its school community?

Near the end of the Summary of Engagement is a table (Table 2) which notes that approximately 85 of the 475 potentially affected landowners were met with. I would like to know how the 85 were contacted and met with. The only thing I can think of is that it is these land owners who responded to their letters of August 2022 inviting them to meet with



representatives of SG. These meetings were not true 'engagement' or part of a Social Impact Assessment – they were merely to inform land owners of what could be happening to their land, and of the designation process itself.

I am incensed at the low level of effective communication with land owners likely to be directly affected by the proposal. I try not to be squinty-eyed and cynical, but I'm sure a proposal as large as this would have been treated quite differently if it were to be planned in a more wealthy, educated area where people are more inclined to litigate.

That said, I once worked as a planner at Auckland City Council. If anyone here should have seen the extent of the proposal coming, it should have been me. But I didn't see it coming. The blue line on the flyers I took to mean some improvements to the bus lane that is already outside our house. Perhaps widening a metre or so to give a bit more space on the carriage way.

When we bought 172 Puhinui Road over 25 years ago, it had a road widening designation on it for a metre or so from the front of the property. This designation was lifted after the full construction of the Cavendish Drive through-route which was where most traffic, including freight vehicles, was expected to travel, leaving Puhinui Road more for local traffic. Since then, bus lanes have been created down Puhinui Road. They are a bit tight so you can imagine, then, when we saw the flyers with the blue line drawn on them, that we thought AT was re-considering minor road-widening such as was proposed when we first bought here, in order to give the bus lanes a little more space.

Even when we received our letter in August 2022 and made an appointment time to talk to SG representatives, I naively went along thinking, even though our whole property was cross-hatched on the map attached to the letter, that only a small sliver was likely to be needed to facilitate improved rapid bus transit via a widening of the bus lane. How wrong I was, and how shocked was I when, at the meeting, after sitting through the planners telling us about the need for improved public transport in the area, they said it was our *entire* property to be taken for the BRT route, and that there would be an enormous raised bridge going through where our house currently sits.

Going back to dissect those flyers, I still don't think even knowing what I know now, that the information that was contained in them gave a true and accurate reflection of the potential *scale* of the proposed BRT. The cynical part of me looks at the documentation and wonders if this was intentional all along.

I feel that I have failed my local community by not seeing this coming.

Page37 of the SIA notes that a reason for people in the area having poor knowledge of the project, is that as it has taken a long time to get to the notification of designations, many people have moved out of the area, and the newcomers don't know about the project. This may be the case, but I would also argue that most long-term residents have not known about the project either.



### Notification of NoRs

Now that we are at the stage of the NoRs being lodged and publically notified as open for submission, AT/AC have sent letters to directly affected land owners (those with properties to be acquired in full or in part if the designations go through).

Given that there are many others (especially in properties that adjoin those to be acquired, or on the other side of Puhinui Road from the properties to be acquired) who will also be massively impacted by the construction and operation of the BRT, I would like to know why these property owners did not also receive letters to notify them that submissions are open.

As mentioned in the SIA, this is a disadvantaged community with a high deprivation level. The formal method of notifying about the NoRs is not one that will readily see people who live here, getting involved and making submissions. Many are elderly. Many have English as a second language. Some have come from other countries as refugees. Some cannot read or write, certainly not to the level required to understand the NoR documents and respond to them. Many families here live pay-cheque to pay-cheque or rely on assistance from food banks to feed their kids. These people will not necessarily have access to the internet, devices, or printing. People who live here are not generally litigious.

I believe strongly that in areas such as this, there needs to be a better method of getting people involved in the process. Face-to-face meetings are needed, with more assistance than can be provided via Friends of the Submitter whose planning offices are based far away on the North Shore (many here I have spoken to are frightened to talk to the FoS as they see they are employed via AC and, therefore, may not be unbiased). I am unsure why a more locally based planning company was not used to provide FoS services to this community – where they could actually come out on the ground and meet with people who are not comfortable communicating via the phone, internet or the written word.

The statutory timeframe does not give people who are working full time much time to read, absorb and submit for a project of this scale, either.

I would not be at all surprised, if the designations go through and, eventually, construction begins, for some of our neighbourhood to be like Arthur Dent in *The Hitchhiker's Guide to the Galaxy* by Douglas Adams. Arthur came out of his house one morning in his dressing gown, to find the bulldozers ready to demolish his house (actually, the whole planet) to make way for a new hyperspace bypass. When he asked about what consultation had gone on for the project, he found that the documents had been available for viewing on another planet.

*"You hadn't exactly gone out of your way to call attention to them had you? I mean like actually telling anyone or anything."*

*"But the plans were on display . . ."*

*"On display? I eventually had to go down to the cellar to find them."*

*"That's the display department."*

*"With a flashlight."*

*"Ah, well, the lights had probably gone."*

*"So had the stairs."*

*"But look, you found the notice, didn't you?"*

*"Yes," said Arthur, "yes I did. It was on display in the bottom of a locked filing cabinet stuck in a disused lavatory with a sign on the door saying, 'Beware of the Leopard'."*

Please, Auckland Transport, Supporting Growth and Auckland Council, let's do better.

### Detailed Design and Construction Phases

The SIA outlines how, *"Ongoing engagement should continue during the planning stage of the Project to continue to maintain and build relationships with the community and provide an opportunity for those new to the area to find out about the project."* Given what I have written above, I don't think there are existing relationships to build on.

Indeed, page 52 of the SIA recommends that a Community and Stakeholder Engagement Strategy be developed for the project that includes, among other things, *"Maintaining the current good relationships between Auckland Transport and Waka Kotahi and the community, particularly directly affected landowners."* This is almost laughable given the poor engagement efforts that have been undertaken to date, despite the two impressive-looking engagement documents. I would challenge AT to find even one affected land owner who truly feels they have been effectively engaged with to date that the organization could say they have a 'current good relationship' with.

The SIA (p.52) suggests information about the project be available for the community, and in particular, affected land owners. The SIA suggests this be done via the AT website. For all the reasons noted above, such as low literacy, ESOL, etc., this is not going to be enough. There will need to be face-to-face meetings and get-togethers.

Please treat our community better than has been done to date with this project.

### **Seek recommendations:**

- That AT/AC communicate much more effectively with affected communities if the project goes ahead.
- That there be a more effective, locally-based 'Friends of the Submitter' type offer to assist people in the neighbourhood with the rest of the designation process (hearings, etc.)

- That not only land owners of properties to be acquired are communicated with, but other affected people too, such as those with properties adjacent to acquired properties
- That there be a dedicated team to work alongside the affected residents during detailed design and construction phases (face to face meetings, etc., not just information on a website).

**Appendix A to submission by Heather Haylock regarding  
Engagement for  
NoRs 1, 2, 3, 4a and 4b**

**Presentation to Ōtara-Papatoetoe Local Board Meeting**

**6 December 2022**

**Regarding Airport to Botany Rapid Transit Route**

## **Presentation to Ōtara-Papatoetoe Local Board Meeting**

**6 December 2022**

### **Regarding Airport to Botany Rapid Transit Route**

**by Heather Haylock**

I am speaking as one of a number of people who live and work along Puhinui Road, as well as others in Bridge Street, Kenderdine Road and Cambridge Terrace and people in the surrounding area, who are to be massively impacted by the proposed Airport to Botany Rapid Transit Route. Mr Kamlesh Rana will also be speaking at the meeting.

#### **Letters**

In July and August 2022, residents of affected properties received letters from Te Tupu Ngātahi Supporting Growth Group/Auckland Transport, advising that the preferred route for the Airport to Botany Rapid Transit Project would impact their properties. The August letter invited individual land owners to make an appointment for an interview with representatives from Supporting Growth. The letter also included site maps for individual properties to show the land expected to be required for the project.

#### **Meetings**

At the meetings, landowners for separate properties were ushered into rooms with two representatives from Supporting Growth/AT. This meant that no landowners met with other landowners, and different pairs of representatives spoke to different landowners.

After being told more about the overall rapid transit project and how it fits into overall plans for public transport in Auckland, landowners were able to discuss the impact on their individual properties.

Many of us were shocked at the extent of the land required. In some cases, it is our whole properties. In others, there are significant slices of land taken from the fronts of properties – in some cases, this would mean the transport routes are within a metre or two of existing front doors.

We were shocked at the extent of the proposed project. In none of the community 'consultation' (see 'Background Consultation' section below) had this been made clear. We had been lulled into a false sense of security, and led to think that the impact on this section of Puhinui Road might be limited to some extension of the existing bus lanes.

The Supporting Growth/AT reps explained the designation process. The plan is for a requirement for designation to be applied for by AT in December 2022, with an opportunity

for people to make submissions and appear at Auckland Council hearings in 2023. If the designation is approved by Council, it will go onto the District Plan maps.

The representatives said there are no plans to purchase properties under the Public Works Act until the project is closer to construction. Different residents were told different things by the various representatives. Some were told properties might be able to be bought in five years time, but most were told that as the project is some 10-15 years away, it would be unlikely that an offer would be made for properties for at least ten years.

Different landowners were also given mixed messages about what the purchase of their properties would mean – what 'market rates' paid for the properties actually means in practice. Many landowners do not want to sell, and have concerns about the fact that their land may be taken anyway, whether or not they wish to sell to AT.

When asked for a map of the route to show the true extent of the project, and the route, and the actual properties affected, the representatives told us that was not possible as it would be a breach of privacy – that they could only talk to individuals about their own properties. This seemed disingenuous; as a result, we have gone door-knocking and made announcements in social media to try to get in contact with as many affected people as we can so we can put together our own map of the route.

When we went door-knocking, it came to light that some residents did not even receive their letters, so had no idea about what was going on. In one case, a resident is currently building a new home in place of the one that was destroyed in last year's tornado. It seems almost unbelievable that consent was given for that building to go ahead in the knowledge that in 10-15 years it will be demolished to make way for the rapid transit route.

## **The proposal**

Despite generalised maps sent out over the past couple of years (see 'Background Consultation' below), at no point was the true scale of the project made clear. It appears that the route comes from the airport, along Puhinui Road, and is then bridged up over the top of the train tracks to link with the top floor of the new Puhinui Train Station. The bridge continues on down past Plunket Ave before the route returns to ground level (apparently a long approach is required on either side of the bridge to get the gradient needed for rapid transit vehicles). Because of the placement of the Puhinui Station, slightly to the south of Puhinui Road, the bridge will go directly through all the properties affected. Scale of the bridge can be seen on the following video: <https://youtu.be/iSeQIR7gzZM>

Not only will it impact the landowners of those properties that will be taken, but it will also impact those neighbours abutting the bridge (e.g., in Freyburg Avenue), leaving them with a bridge at the bottom of their backyards. These people have not been consulted with at all.

There is planned to be another station at the intersection of Puhinui Road and Lambie Drive, before the route travels along Lambie to get to the Manukau Train Station. After that it winds its way back towards Te Irirangi Drive where it continues to Botany Town Centre.



In addition, the plan is to widen the sections of Kenderdine, Bridge Street and Cambridge Terrace to allow better traffic flow for local traffic and buses, and walking and cycling. Nowhere in the background consultation maps was this suggested at all, so the project has come as a massive blow from left-field for those land owners.

### **Background 'consultation'**

After the interview meeting with the Supporting Growth/AT representatives, we spent some time trying to work out how such a massive project had got to this stage of development without us knowing.

We found reference to two documents which outline the community participation programme. *Southwest Gateway Programme Engagement Summary December 2017 to December 2018*, and *Southwest Gateway Programme Engagement Summary January to December 2019*. ([see end of this report for location of downloadable documents](#))

In summary, it appears that residents along the route will have received some flyers in the mail over the past few years, and had the opportunity to go and look at some posters in places such as Papatoetoe New World one evening, and Westfield Manukau on two dates.

There were presentations made to a number of local boards, including the Ōtara-Papatoetoe Local Board on 17 September 2018. (Airport-Botany 20 Connect Southern Local Boards presentation) ([see end of this report for location of downloadable document](#))

When we study the information sent to residents in the flyers, and even the information presented to local boards, the route was a generalised blue line along Puhinui Road, with absolutely no indication of the scale, including the plan to build a bridge to link with the Puhinui Train Station, and to realign the route to go through all the houses on the southern side of Puhinui Road from Clendon Ave on past Plunket. There was also no reference to the impact on Kenderdine Road, Bridge Street and Cambridge Terrace.

We are also concerned that as the flyers were delivered, not in envelopes, and not individually addressed, they may well have gone un-noticed in the 'junk mail' many of us put straight in the recycling bin.

When we dug down into the type of consultation that occurred at the New World and Westfield Manukau information sessions, people were asked generalised questions designed to get standardised answers. They were offered the opportunity to write short comments and place them on maps with post-it notes.

The two Engagement Summary documents are very thick and impressive-looking, but when you actually read them, there is a lot of repetition. Much fluff and not much substance. We were fascinated to read that groups such as residents groups in Wattle Downs, Weymouth and Alfirston (to name a few) were consulted with – while in the meantime, people whose actual properties would be taken by the project were not directly contacted at all.

In a shortened summary of the community engagement feedback that appeared in the letterbox, it states: *"We asked people what they thought of the preferred rapid transit route between the airport, Puhinui Station Interchange, Manukau and Botany. Of the 62 responses, 83% of people were in support of the preferred route."* This is misleading. The only 'options' referred to here were whether the route through Manukau City itself would go via the Manukau Train Station, or leave the station out and go along the adjacent road instead.

We consider that with a project of this extreme magnitude, more should have been done in the planning stages to involve the local community and landowners directly affected.

It feels to us as though the project has been pushed through underground, in a way whether intentional or not) that has misinformed those directly affected until the last possible moment when the designation was about to be applied for. This does not seem fair, equitable or democratic.

We are concerned that many people in our area will not have been able to access the information. There are many here for whom English is a second language. And many busy living from pay cheque to pay cheque to survive in these difficult pandemic times. These people will not have had an equal chance to participate in this process.

As our representatives to Council, we ask that the Ōtara-Papatoetoe Local Board supports the affected residents throughout the coming process.

### **Attempts to get further information**

At our individual meeting with the Supporting Growth/AT representatives, we asked about the business case that has been put together and, specifically, what other options were investigated. One we suggested was that rather than going through the residential area, why not take the rapid transit directly from the Puhinui Station to the Manukau Station along the corridor already developed for that purpose. We did not get a satisfactory answer to our question.

The representatives there seemed focussed on telling us about the designation process, and what would happen when our land is required.

We emailed Supporting Growth, asking for further information, but were told, once again, no further information could be provided to us about the actual route, citing privacy concerns for other land owners.

### **Local MP, Media**

Some of us have appeared in the *NZ Herald* and *Stuff* talking about the concerns. There are others further along the route near Botany Town Centre who have done the same.

We have also approached Arena Williams, our local Member of Parliament. She has been extremely helpful in trying to get further information from Auckland Transport. She has held a meeting for residents (some Local Board members also attended) and there is another meeting planned for Wednesday 30 November, where AT representatives will be in attendance.

### **Main concerns**

To summarise, some of the main concerns we have are:

#### Uncertainty

This project puts landowners in an untenable situation. They are in limbo. Some planned to stay in their homes until their deaths. Others planned to sell in the next few years.

Having a designation (or even a proposed designation) on a property means it will be difficult to sell. And until AT applies for and gets central government funding, it is our understanding they will not be looking to buy properties for the foreseeable future.

This uncertainty is putting people under incredible amounts of stress. We have heard reports of people being extremely upset, to the point of depression and anxiety attacks.

#### Property Value and liveability

Having a designation on a property affects its value. For those whose whole properties are planned to be taken in their entirety, it affects how much those properties can reach.

For those whose properties have a sizeable chunk taken away from the front of them, they will be left with a roadway very close to their front doors. This will impact their quality of life. In addition, in some cases, it will leave them with a tiny property footprint that will be incredibly hard to either develop or sell.

Another concern is that given the uncertainty, people may neglect to develop and maintain their properties in the meantime, in the knowledge that the houses will eventually be taken and demolished. This will then potentially have a negative impact in terms of property values for the area that may apply when and if AT gets the central government funding to buy the properties under the Public Works Act.

#### Fairness

The process seems very unfair and one-sided. It feels like AT has all the power and we have none.

#### Process

The consultation process to date has not been effective in letting people know about the project and its true scale and impact. It seems very wrong that those people most directly affected have not been contacted directly until almost the very last minute. (Indeed, some never received their letters at all.) It also seems wrong that those with properties adjoining

the proposed route have not been involved in the process either, as the project will have a massive impact on them and their property values too.

### Potential

In none of the documentation seen so far, has there been any mention of potential improvements to the public facilities in the affected area, to go along with the proposed rapid transit route itself. If the project does end up going ahead, it would be an opportunity for this area to have some extra investment in public facilities (e.g., pocket parks). If the large swathe of land is to be taken anyway, and developed with a rapid transit route and bridge, we would urge AT to ensure that some of that land is used as a buffer for neighbouring residents (e.g., along Freyburg Ave), and that it is landscaped appropriately. There is a dearth of parks in this Puhinui area, with the closest playground being at Sunnyside Reserve. With the residential intensification occurring in the area, there is a need for places for people to relax and play. Perhaps the negative outcome of a rapid transit route could be somewhat ameliorated by sensitive landscaping and investment in seating, playground equipment, plantings, etc.

### Equatability

We are not a flash area in comparison to many other parts of Auckland City. We are a strong community, however, with many people having lived here their whole lives (and some families have been here for generations). We do not have the financial ability to take this project to its legal conclusion (to the Environment Court) if necessary. We wonder if this type of project would have ever been proposed if it were in a more wealthy suburb of the city.

### **Local Board Involvement**

As our representatives to Council, we ask that the Ōtara-Papatoetoe Local Board support us in our efforts to raise awareness about this project and its impacts.

We ask that the Board require more detailed information from AT about the actual route, including properties affected (there may still be some people completely unaware their properties are affected if they did not receive their letters in the mail).

We also ask for continued support as the designation process is undertaken throughout 2023 and beyond.

### **Attachments**

1. *Southwest Gateway Programme Engagement Summary December 2017 to December 2018* <https://at.govt.nz/media/1981430/southwest-gateway-programme-summary-report.pdf> too large to attach here but available by scrolling down on the following website page: <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-transit>
2. *Southwest Gateway Programme Engagement Summary January to December 2019* [https://at.govt.nz/media/1983567/southwest-gateway-public-summary-report-sept-](https://at.govt.nz/media/1983567/southwest-gateway-public-summary-report-sept-2019.pdf)

[2020.pdf](#) too large to attach here but available by scrolling down on the following website page: <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-t-ransit>

3. *Airport-Botany 20 Connect Southern Local Boards 17 September 2018*

<https://www.scribd.com/document/393138223/2018-08-17-Southern-Local-Board-Cluster-Meeting-V2> or

<https://fyi.org.nz/request/8884/response/29778/attach/5/2018%2008%2017%20SouthernLocalBoard%20ClusterMeeting%20V2.pdf>

## Flood Hazard

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on flood hazard for properties near the BRT route

### Reasons for Submission:

The Assessment of Effects on the Environment (AEE) (pp. 91-92) notes that a '100 year flood' calculation is being used to in modelling to assess the impacts of flood hazard. It recommends that there be no increase in flood levels for existing authorized habitable floors that are already subject to flooding. It also notes there should be no more than a 10% average increased flood hazard for the main access to authorized habitable dwellings.

Given the recent catastrophic floods in the Auckland region and elsewhere this summer, along with the predicted ongoing changes to the climate including a greater frequency and severity of extreme natural events such as rain storms and floods, I think both AC and AT should look at whether the level of risk is acceptable to the community. At the design stage of the BRT project, AT can consider ways it can contribute to lessening flood hazard in the surrounding areas (e.g., by looking at the creation of a 'ribbon park' that would help absorb stormwater (see my other submissions on this topic) using land acquired for but not used for the BRT route infrastructure.

### Seek recommendations:

- That AT and AC reconsider the use of the '100 year flood' calculation and the no more than 10% increased flood hazard risk, and whether this level of risk is acceptable to the community given recent rainfall events and the potential for increased severity and frequency of extreme weather events in the future.
- That AT consider, at the design stage of the project, ways in which it can further reduce the flood hazard in areas surrounding the BRT route (e.g., stormwater soaked up in a 'ribbon park' created on unused acquired land.

## Land Acquisition

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on properties to be acquired either wholly or in part, near the BRT route

### Reasons for Submission:

The proposed BRT route, if it goes ahead, will require the acquisition of a large number of properties, either wholly or in part. This includes both residential and commercial/industrial zoned properties.

The acquisition will occur by means of the Public Works Act.

Affected land owners are confused. They are anxious. They are angry. They are sad.

At meetings with residential property owners at the Allenby Motel after letters were sent to landowners in August 2022, representatives from Supporting Growth (SG) were at pains to explain that the process would be carried out equitably and fairly. Terms such as ‘market value’ and ‘payments for moving house’ were used.

The fact remains that there are many people living along the route who do not want to move. Indeed, some will struggle to. There are people who have developed their sites into multi-generational homes, and vow to only ever ‘be carried out in a box’. Some people are in the situation of having reverse mortgages on their homes.

There is the concern, too, of ‘market rates’ and what a proposed designation on a property will do to those rates. People don’t know whether to sell early or to hold on. In any case, it is our understanding that AT doesn’t yet have the central government funding it requires for such an enormous transport building project (and significant land acquisition).

Residents have already had letters in the mail from property lawyers saying they can actually sell early if they want to, and that there is an obligation for AT to purchase the properties if they are hard to sell in the current market with a proposed designation hanging over them. This has confused people and given an added layer of anxiety and worry.

There are some who had been planning to move in the next few years (before the 10-15 year construction timeframe). They are now in limbo, not being able to sell privately (who would want to buy a property for a fair price with a designation on it?), but not yet being able to negotiate with AT about acquisition.

Those of us with properties to be acquired under the designation have been warned that there will be developers knocking on our doors to buy our properties at low prices so they can land bank and hold out for a higher price from AT close to the construction period. As

mentioned in my other submissions, this is an area where people are not always able to advocate effectively for themselves in such situations.

People we have heard of in other areas (e.g., residents affected by recent roading projects in Pakuranga) have had to fight hard to get more than the minimum value for their properties that was offered by AT and its valuers. Some people in affected properties along the BRT route, are likely to struggle with this part of the acquisition process. They will need independent support and guidance.

Some people are faced with the prospect of only part of their properties designated to be acquired. Many of them would prefer their properties be designated for acquisition in their entirety, as their properties will be either unlivable or unsellable with large chunks taken off the front for the project.

Others, who are not impacted directly by their properties being acquired, live in properties that are adjacent to designated ones. They, too, may well wish to leave the area to avoid the negative impacts of noise and vibration, etc. But they are now in a position where they will adjoin designated land, so their land value will be negatively impacted.

Sadly, the uncertainty caused since the letters of August 2022 has caused some members of our community to leave the area already. One young family we know has moved to another suburb. They have a four year old who was due to start soon as a new entrant at Puhinui School soon. But because they want certainty and continuity for their children throughout their school years, and for their kids to make friendships at primary school that continue through intermediate and high school, they have chosen to move and establish elsewhere. They were concerned that they may need to leave the area sometime when their kids are at intermediate or high school given the timeframes of the BRT project, and didn't want to take that risk. They are a loss to our community.

People need greater certainty than they have currently. To stay or to go? To sell sooner or hold out till the bulldozers are revving up? People don't know what to do. More support is going to be needed in the community to help people navigate the process and come to decisions they can live with.

#### **Seek recommendations:**

- That independent support mechanisms be put in place, funded by AT similar to 'Friend of the Submitter', to help those impacted by property acquisition to advocate for the best outcomes for themselves.



## Route and Station Options

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Route options and station options chosen for entire length of BRT (covers NoR 1, 2, 3, 4a and 4b)

### Reasons for Submission:

#### 1. Project Objectives:

Form 18 and other documentation for the NoRs note that the *primary* project objective for the Notices of Requirement are to provide a bus and rapid transit corridor that connects the key destinations of

- Auckland Airport (from the Orrs Road boundary),
- Manukau City Centre and
- Botany Town Centre.

There is also the *second* objective of providing corridors for both public transport and active modes (walking and cycling).

#### Cars and freight vehicles:

It is notable that the continued efficient use of private cars for passengers, and efficient use of road vehicles for freight are not mentioned in the list of project objectives.

#### 2. Pūkaki Creek:

Also notable is that the section of the eventual route from the airport itself to Orrs road is not part of the study area or the sections covered by the NoRs. The Assessment of Environmental Effects (AEE) section 2.1.1 addresses this, noting that, *“Through the Eastern Access Agreement, it was agreed that the form of the bridge over Pūkaki Creek would remain as a two-lane bridge in perpetuity. This bridge is located to the West of Orrs Road and is a crucial element for the future connection of the Project to Auckland Airport.”*

Indeed, if the configuration of this bridge is not altered to make it wider, or an alternative bridge structure provided, none of the overall BRT project outcomes will be achievable. The end of the NoR will see enormous traffic jams as private cars and rapid transit buses try to navigate what is already a narrow, restrictive bridge.

It seems ludicrous to continue with the social anxiety and upset being caused to affected residents and business owners, and work involved for staff at AT, SG and AC, etc., in progressing the NoRs until there is a clearer indication that the bridge can be widened or another bridge structure built over the Pūkaki Creek.

### 3. Route Options considered:

Appendix A (Volume 2) of the AEE assesses alternatives to the chosen route. I refer to this document as the AoA (Assessment of Alternatives).

Page 2 of this document notes the process of looking at alternatives should be

- transparent, robust and clearly recorded so as to be understood by others.
- In addition, an ‘appropriate range of alternatives’ should be considered, and
- The extent of options considered should be proportional to the potential effects of the options.

A range of alternatives were, indeed, considered (e.g., the ‘initial options’ in Figure 8, p. 22). Some of the alternatives followed variations of the final route presented in the NoRs. Other options went further North towards Mangere, or further South towards SH20, or further East on Chapel Road.

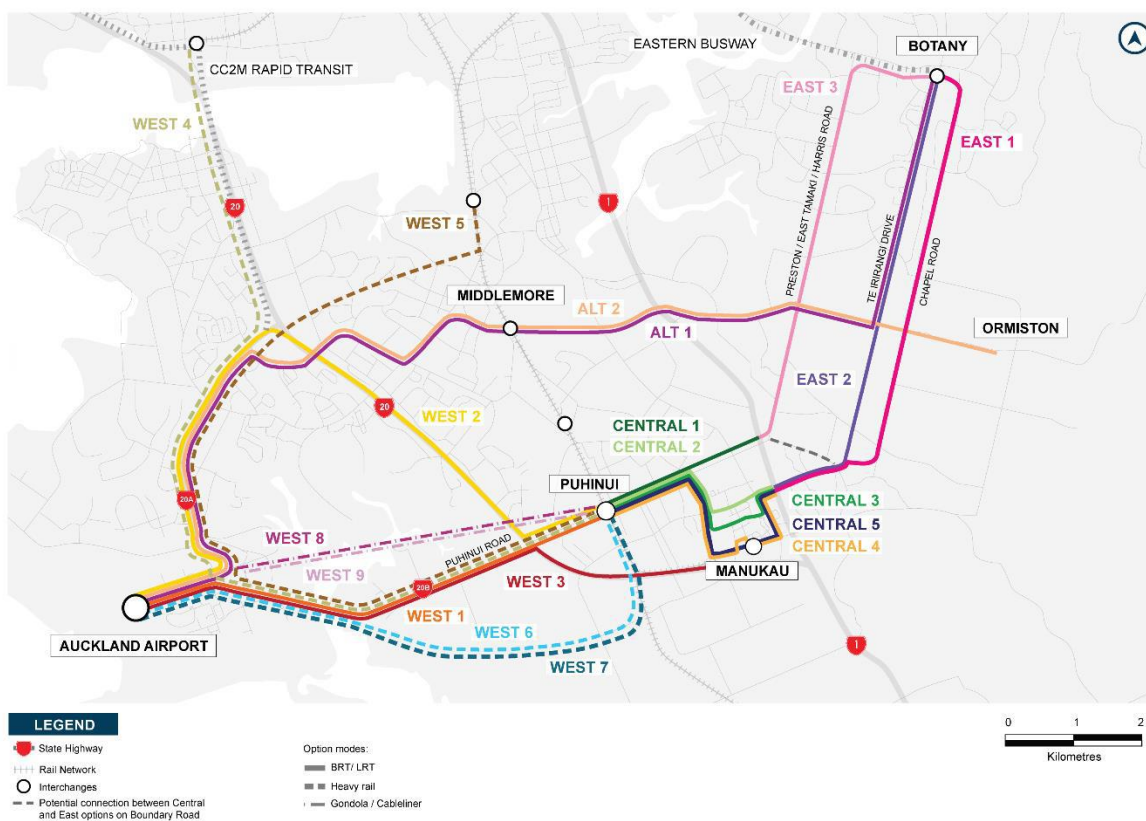


Fig 8 pg 22 Assessment of Alternatives

A shortlist was eventually chosen (map on p.66 AoA) which broadly follows Puhinui Road from Orrs Road along SH20b, over a new BRT bridge at Puhinui Station, continuing along Puhinui Road to Lambie Drive, along Lambie, winding around Hayman Park to Manukau Train Station, then winding through several tightly aligned streets in Manukau City Centre before continuing on directly to Botany Town Centre along Te Irirangi Drive.

Along that route, 12 stations (stops) have been identified where passengers can get on and off buses.

Different modes of transport were also considered as part of the process, with the final decision being rapid transit buses (electric, high frequency, large vehicles with plenty of room for passengers).

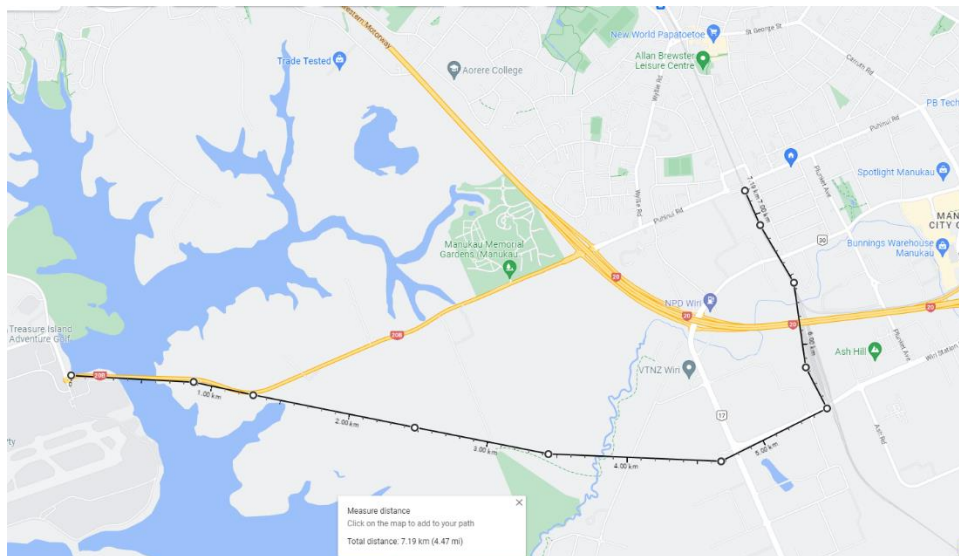
Concerns/Alternative options not in the documentation:

Going back to the primary objective of connecting the three centres – Airport, Manukau and Botany, the route chosen seems to have some significant ‘dog legs’ that will make the journey slower and less direct. In particular, the winding route around Hayman Park and back through Manukau City Centre, before finally reaching Te Irirangi Drive, appears unnecessarily convoluted.

I would like to know why some other options do not appear in the documentation to have been considered at all.

Airport-Puhinui Station

As there are no planned stations/stops between the Airport and Puhinui Station, why does the route go down SH20b and the Western end of Puhinui Road to reach Puhinui Station? Could it not have been aligned in the vicinity of the West 6/West 7 original options?



Indicative map of route West 6 or 7 (as BRT rather than heavy rail)

I note those options were originally considered as part of a heavy rail option, but I see no reason that a BRT route could not have been considered along that alignment instead, going through what is primarily rural land or land being developed for industrial or commercial use in the vicinity of Prices Road, with the eastern end approaching Puhinui Station running beside the existing heavy rail line. Aligning a BRT along here would remove the necessity to disrupt a significant number of residential and commercial land owners along Puhinui Road. Yes, there would be alternative land owners to negotiate with, but these would be fewer in number and have less significant building infrastructure already in place.

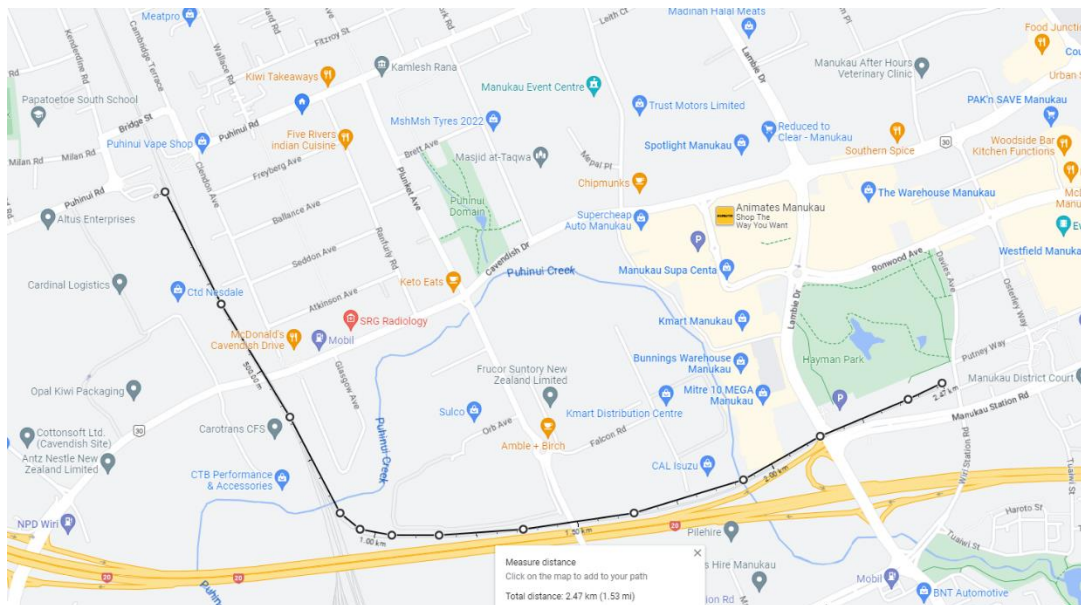
### Puhinui Station-Manukau Station

I also question why the proposed BRT route continues from Puhinui Station along Puhinui Road via a significant, large, bridged structure, to a proposed new station at the intersection of Puhinui Road and Lambie Drive, then along Lambie and around Hayman Park to the Manukau Station.

This route will require the purchase of a significant number of existing residential dwellings or part thereof, as well as some commercial zoned land. It will leave remaining residents (an future residents if the area is intensified) living within the shadow and noise of a large bridge structure.

I am aware that going down this route, along with the addition of a station at Lambie Drive, may pick up some passengers who live within walking distance of this new station. However, there are questions about how many passengers would actually access this station, referred to in the documentation (e.g., Figure 16 on p.16 of the Assessment of Transport Effects) and it may be that a more direct (i.e., faster) route between Puhinui Station and Manukau Station exists.

I cannot find anywhere in the options documentation that shows an option has been considered of constructing a BRT route either alongside or instead of the heavy rail connection that has recently been completed to link the Puhinui and Manukau Stations.



Indicative direct route Puhinui Station to Manukau Station via BRT next to or instead of existing rail line spur

Going along this route directly links Puhinui Station to Manukau Station. It would, yes, mean that some people living in walking distance from the proposed Lambie Drive station would not be so close to a BRT station, but if the primary objective of the project is to link the Airport-Manukau-Botany centres, this may be a worthwhile trade-off. There are other non-structural options such as regular shuttle buses or vans to take people from this Lambie area (and others around Papatoetoe and elsewhere on the route) directly to either Puhinui or Manukau stations to catch the BRT vehicles to either the Airport or Botany.

### Manukau Station-Te Irirangi Drive

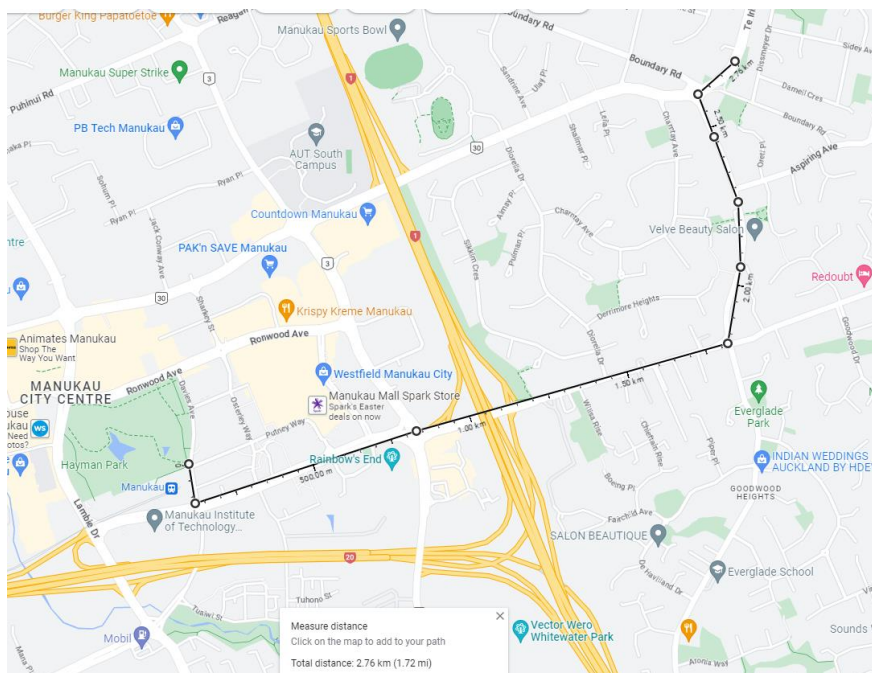
The dog-leg in the proposed route continues from Manukau Station along Davies Ave, winding along Ronwood Ave and Great South Road before turning sharp right to travel along Te Irirangi Drive for the remainder of the journey to Botany. The Social Impact Assessment (SIA) notes in Appendix B that Westfield Manukau is planning to develop its own public transport hub near Friendship House. The SIA notes Westfield asked that a bus stop be put on Ronwood Ave. I am unsure how this request for a bus stop has turned into an entire BRT station on Ronwood Ave in the NoR documents. I would like this explained to me.

If, once again, we go back to the primary objective of getting people from the Airport-Manukau-Botany, this dog-leg seems counter-productive, adding to the length, complexity and time of the journey, not to mention the significant portions of commercial land that will need to be taken to fit the BRT into a widened carriageway. In addition, (see Fig 16 of the ATE referred to in section 4 of my submission below) it appears that adding the Ronwood station onto the route will not significantly increase patronage compared with focusing efforts on the existing Puhinui and Manukau stations.

A much more direct route that I cannot see considered in the documentation that I could find, would be to take the BRT directly from the Manukau Station along Station Road, up Redoubt Road, down Hollyford Drive (which already has an extremely wide berm for its entire length that would mean no need for property acquisition) to link with Te Irirangi Drive.

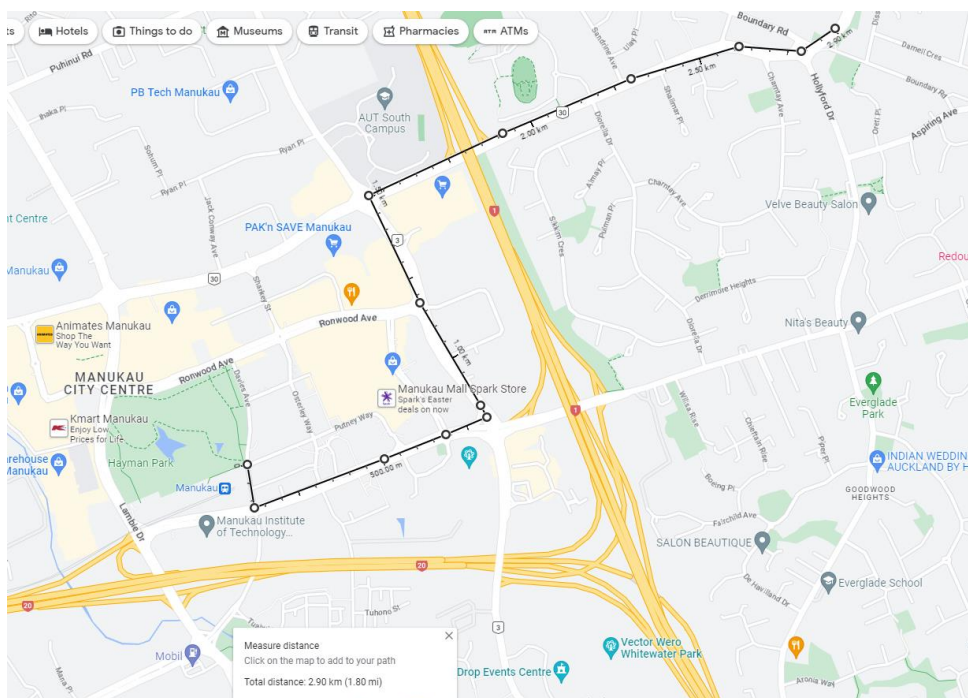
I am aware that in a number of the NoR documents, taking the BRT along Manukau Station Road and turning onto Great South Road to get to Te Irirangi was discounted as it would interfere too much with the Great South/Manukau Station/Redoubt Road intersection with car and freight traffic. This argument does not seem to have interfered with plans elsewhere on the route to interfere with traffic on existing road ways (e.g., Puhinui, Lambie, Davies, Ronwood, etc).

I would like this route to be investigated for its potential for the BRT, including the number of affected residential properties along Redoubt Road that may be affected, and the gradient of the road.



Potential more direct route Manukau Station to Te Irirangi Drive via Manukau Station and Redoubt Roads - Hollyford Drive

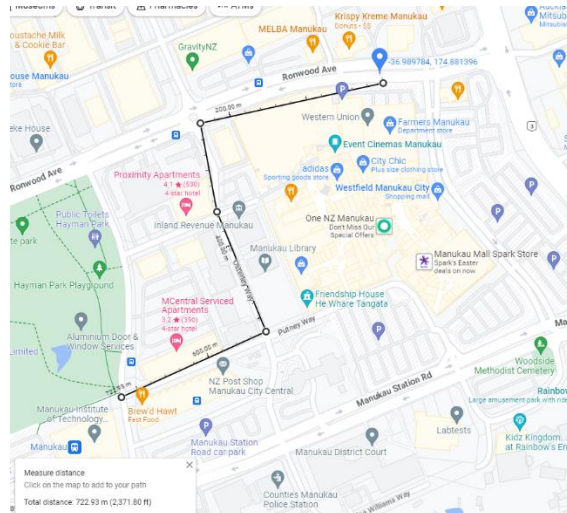
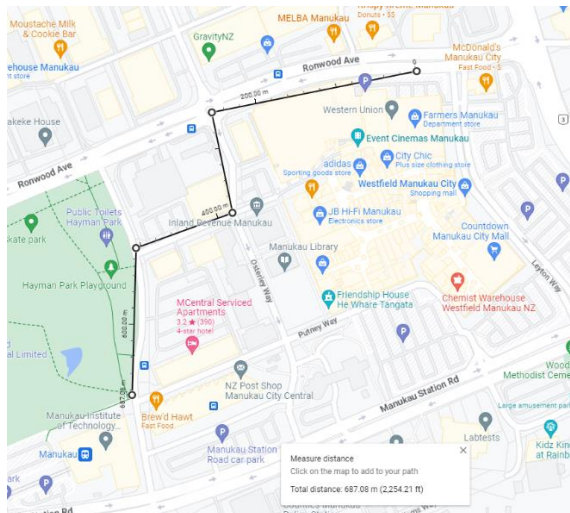
Another option could be going along Manukau Station Road, Great South Road and then to Te Irirangi Drive, to avoid the residential area along Redoubt Road along with the steep gradient of Redoubt Road to Hollyford Drive.



Potential more direct route Manukau Station to Te Irirangi Drive via Manukau Station and Great South Roads

While people closer to Ronwood Ave would not have a dedicated station there under these options, there is the shuttle bus/van idea noted above for the Lambie station catchment, and if walking infrastructure (e.g., covered ways) were improved in the Manukau City Centre streets, it is approximately 700m depending on the route taken, well within the 1km walking

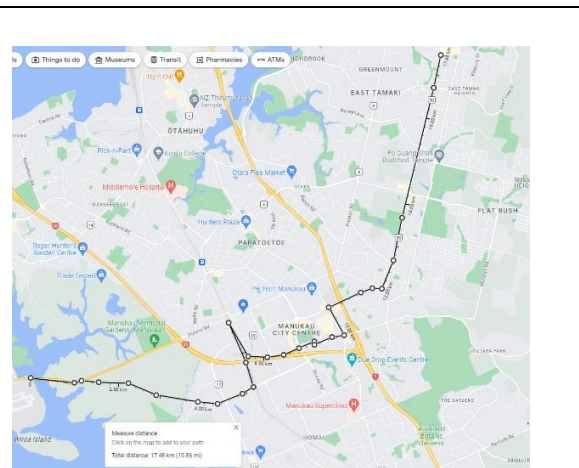
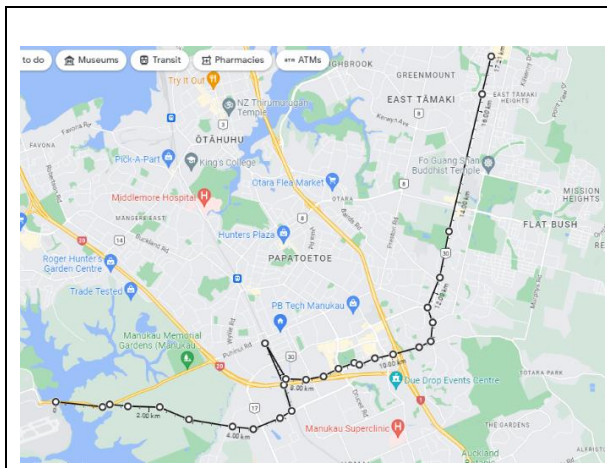
distance to a rapid transit station that is quoted elsewhere in the NoR documentation. (See approx. walking distances on maps below.)



Distances to walk from Ronwood Ave near Gt St Rd to Manukau Train Station

I would like AT to consider and let submitters know about these other options that do not seem to have been considered in the documentation. These other options would be

- more direct (avoiding the dog leg around Hayman Park/through Manukau City Centre)
- faster (with less stops)
- requiring the acquisition of fewer residential and commercial properties along the route.



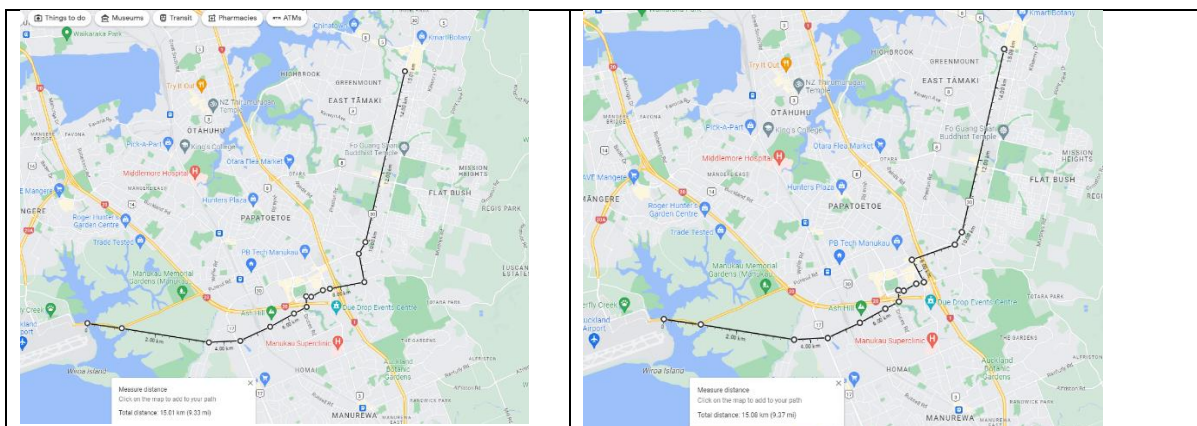
Two potential indicative alternative overall routes Airport-Manukau-Botany

Overall Route – role of Puhinui Station

When put on a map, the options I have requested be re-looked at have an obvious detour to the Puhinui Station (as does the proposed BRT in the NoRs).

Another option would be to not go through the new Puhinui Station at all. If the true main objective of the project were to link the Airport-Manukau-Botany route directly, this option would seem to directly achieve that objective. This would be another option for AT to report back on.

I imagine it would be unlikely to gain much political support given the huge amount of money that has been spent on building a very large station at Puhinui already it seems to the outside eye at least, to have been designed with the BRT bridge option firmly in mind. (The Puhinui Station’s location to the South of Puhinui Road alignment and the large verandah which has been designed to link with the proposed bridge.)



Two potential indicative alternative overall routes Airport-Manukau-Botany sans Puhinui Station

4. Station Options considered:

It appears from information in the Assessment of Traffic Effects (ATE) figure 16, which estimates daily boarding numbers at stations on the route in 2038, the expected numbers of passengers accessing the BRT by the Lambie Drive and Ronwood Ave BRT stations will be well below the expected numbers using other stations, notably the existing Puhinui and Manukau Stations.

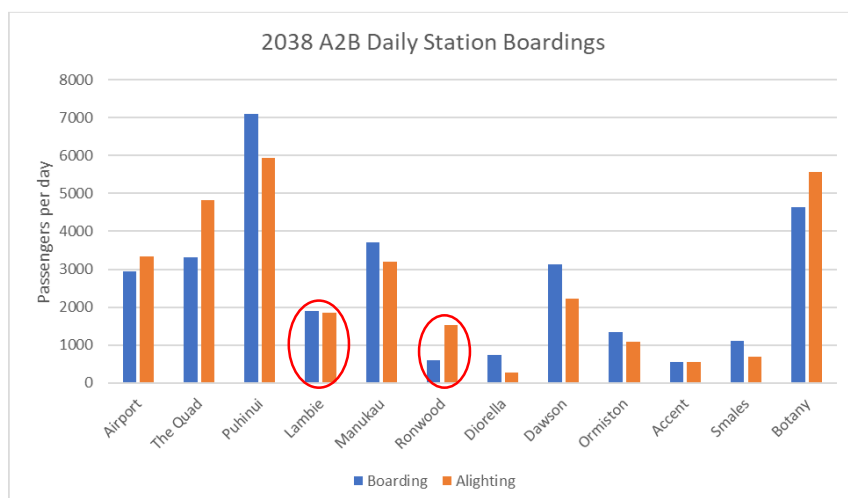


Fig 16 from ATE



This feeds into my questions about the need to take the BRT route via Puhinui Road, Lambie Drive, etc., with the dog-leg back down Davies and Ronwood Aves.

If the main objective of the project is to get people quickly and efficiently between the Airport-Manukau-Botany, the addition of smaller stations along the way such as Lambie and Ronwood seems to not directly support that objective.

(Note, too, that many of the other stations in Figure 16 above that are not associated with a shopping centre or existing major transit station, are also expecting very low daily boardings – e.g., Diorella, Accent and Smales. These stations should also be looked at again to determine whether they actually assist in achieving the main objective of getting people rapidly between the Airport and Botany.)

I also question why, in the plans shown in the NoR documentation, there are no stations located between Puhinui Station and the Airport, given the significant new development of commercial areas in the general area of Prices Road, etc.

#### Lambie Drive

The documentation, and time spent talking with AT and SG staff at meetings, seems to suggest that the main reason for going along Puhinui Road and having a station at Lambie Drive, is to provide people within walking distance of that station, the opportunity to get on and off the BRT. (With the added factor of encouraging high density 6-storey residential intensification around public transport stations.) This is mentioned in some of the documentation (e.g., p. 106 of the AoA). However, p. 107 of the document notes that the Lambie Station is a 'minor priority'.

I would like to see other, softer, non-hard-infrastructure options, researched and reported back to AC and the community. For example, frequent, rapid mini-shuttles that circulate from that Lambie-St George Street area, taking people to either the Puhinui or Manukau Stations to access the BRT.

#### Ronwood Ave

In relation to the proposed Ronwood Ave BRT station, I note (in Appendix B of the SIA) that Westfield Manukau has its own plans for expansion, including extending its current building footprint to cover the large existing open car park along the boundary with Great South Road, and developing its own public transport hub. This plan for a separate, new transport hub seems a little odd to me, given that so much resource has already gone into developing the new Manukau train station and the Manukau bus station right on the doorstep of Westfield Manukau. These relatively new bus and train stations are 700m or less from the furthest corner of the current Westfield building footprint where Farmers department store is. (Well within walking distance from the shops.) If resources were put into improving the walking and cycling surfaces leading from the shops to the bus and train stations (e.g., suitable wide shared paths, covered areas where required), it seems to me that the proposed Ronwood BRT station would be unnecessary.

I would like to see AT reconsider and explain more fully the reasoning behind the perceived need for a BRT station at the Ronwood location, given the close proximity of the existing bus and train stations to the Westfield shops. Is it something AT has agreed to in order to acquire support from Westfield Manukau given the significant disruption the construction of the proposed BRT will have on the commercial area noted in Appendix B of the SIA? I cannot see any other logical reason for locating a station at Ronwood Ave, despite having read through the documentation provided in the NoR.

#### Wyllie Road area potential station

Given the rationale for the station at Lambie Drive, which has largely been given as serving the residential catchment within walking distance of that station, why then, is there not a similar station to serve those in the Western part of Papatoetoe, in the region of the intersection of Wyllie Road with Puhinui Road? It would seem that people are required to make their way all the way to the Puhinui Station if they live anywhere near Wyllie Road/Pah Road etc., which seems to not be the same reasoning compared with the station being provided for those living in walking distance of Lambie Drive and the proposed station there.

#### SH20b Potential Station(s)

There is currently significant new development of land that was previously zoned rural, into commercial zoned properties. This is currently mainly occurring on the Southern side of SH20b in the vicinity of Prices Road. Given this commercial development, along with the fact that the Manukau Memorial Gardens are a significant destination, it seems bizarre to me that there are no BRT stops planned to serve this area of the route.

P.106 of the AoA assesses this commercial development area as being a low-density land use that does not warrant a BRT station. When talking to AT and SG staff, I was told that if people working in that area wanted to use the BRT, they would either have to get off at Puhinui Station and catch a bus or uber to work, or go all the way to the Airport, then catch a bus or uber back to work. This seems unlikely – people will just take their cars, adding to the congestion on the road network.

If the dog-leg around the Manukau City Centre with its added station goes ahead, with the delays traversing that area and the Ronwood station, why not allow a little more delay by adding in a station or stations in the vicinity of the Memorial Gardens and the new commercial zoned area near Prices Road?

#### 5. Hard Infrastructure/Mode Options:

Throughout the NoR documentation is the obvious desire to pursue a hard infrastructure approach to the perceived problem of there not currently being an effective, resilient, frequent, fast way for people to get between the Airport-Manukau-Botany. (e.g., AEE Appendix A 4.1.2.1 where non-infrastructure interventions are discounted in favour of new

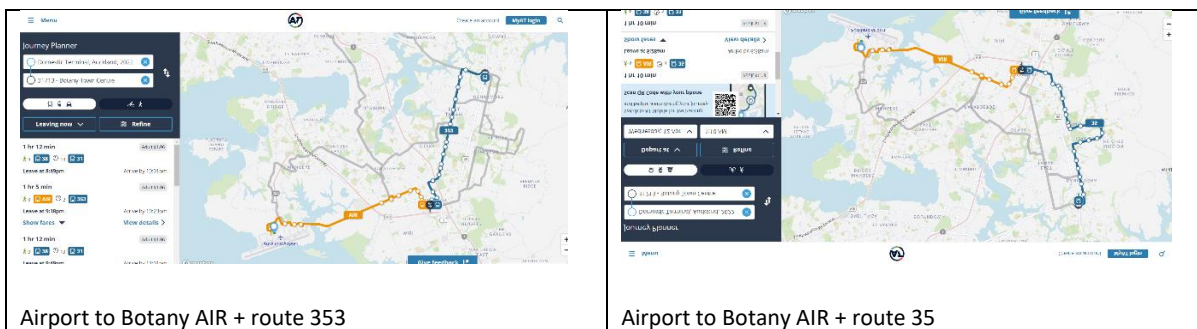
infrastructure as opportunities for the future. This seems to me, to be backwards – why not thoroughly investigate non-infrastructure interventions first (e.g., new bus routes, more frequent bus services) before embarking on costly, long-term, non-retractable infrastructure projects?

Hard Infrastructure for BRT

Section 1.3 of the AEE notes the current bus routes do not get people quickly enough from one end of the route to the other and that the area is not well-served currently by public transport. Appendix A of the AEE (the Assessment of Alternatives) section 4.1.2.1 concludes that hard infrastructure is the best option to solve the problem.

I went onto the AT Journey Planner site, to look at the current bus routes running between the Airport-Manukau-Botany.

The orange AIR bus runs frequently between the airport and Manukau bus station (adjacent to Manukau Train Station) along Puhinui and Lambie Drives. From Manukau bus station to Botany there are two main existing bus routes – the 353 bus that goes via Preston and Springs Road, and the 35 bus that goes via Chapel and Murphys Roads.



It is notable that neither of these existing bus routes between Manukau and Botany actually go via Te Irirangi Drive currently. Given that Te Irirangi Drive currently has a faster speed allowance (60kph) compared to most of Preston/Springs or Chapel/Murphy, we don't know how fast it could actually be to go by bus now if it were to go via Te Irirangi Drive. I would like to know the comparison between a bus travelling along Te Irirangi Drive between Manukau and Botany, and the current buses that go via either the 353 or the 35 route.

Te Irirangi Drive is the route for the proposed BRT. It already has a wide median which was designed with some form of rapid transit in mind. Current transit times include the slow speed bus route 353 or 35. If this section of the BRT were to be built on the median as suggested in the NoR, it may give enough of a boost to the speed of the Airport-Manukau-Botany link without the enormous disruption caused by the hard infrastructure proposed elsewhere on the route (e.g., Puhinui Road, the BRT bridge linking Puhinui Station, etc.)

I would like AT to research and report back on how long it will be expected to take to go by bus via Te Irirangi Drive both now and when the BRT would be expected to be built (10-15 years). At the moment we are comparing the time it takes to take a future BRT route

between Manukau and Botany, against how long it takes to go now via either the slower Preston/Springs or Chapel/Murphys, not via the faster Te Irirangi.

We need to be comparing apples with apples, and with the information contained in the NoR I am comparing apples with carrots.

It may be there is not as much need for a hard infrastructure approach for the entire length of the route (including the BRT bridge at Puhinui Station), if the Te Irirangi Road section were built first and bus schedules and routes were re-assessed and re-jigged, then the situation looked at again. However, understanding the need to protect/designate land ahead of time, I'd like to at least see some scenarios with the alternative route (no BRT bridge etc., at Puhinui Station, go via existing AIR bus from Airport to Manukau, then a BRT directly going along the median of Te Irirangi Drive) to compare the right fruit with the right fruit, not with a vegetable.

#### Mode Options and Public Transport Usage

This is not my area of expertise however; I would like to know how much research AT has done into the future of transport technology.

Will we still be using large scale buses in twenty years' time on fixed routes, or will there be other options? Things that come to mind are self-drive cars or mini vans that you can arrange to pick you up and drop you off exactly where you want to go. If this is the future of transport technology, will there be a need for large-scale infrastructure projects like the one planned for in the NoRs? Will we need to be planning for large buses to go along pre-determined routes? Or will we be looking at smaller-scale, more agile technologies and the opportunities that go with them?

I would like to see proof that AT has considered the future options and isn't just planning for current technology in a future world.

Living on Puhinui Road, with my office where I work from home with a window looking directly across the road to an AIR bus stop, I get to see the frequent orange AIR buses passing by. I would say that 99% of the time, they have, at most, three passengers on them. Often they go by with no passengers at all – just a driver. This does give me pause to wonder how much the proposed BRT will actually be used.

If we go to the airport we use the AIR bus, and can confirm that more passengers use it between the airport and Puhinui Station than they do between Puhinui Station and Manukau Station. Our daughter attends university at the Auckland University South Campus on Osterley Way. She often takes the AIR bus to and from her lectures. She calls it her 'personal uber' as she is generally the only person on the bus, and it drops her almost outside our door.

I realise the proposed BRT isn't planned to be constructed for 10-15 years, but I really do wonder what 'push' factors will cause people to use the service over and above the 'pull' factor of a new, purpose-built, frequent rapid bus infrastructure.

I would like to see information from AT to know they have considered the current low patronage of sections of the AIR bus route, and how this will change with a new BRT system in place.

#### Seek recommendations:

- In relation to section 1 above, delay continued development of the NoRs until crucial decisions are made about the bridge (or an alternative bridge structure) over Pūkaki Creek.
- In relation to section 2 above, require AT to reconsider and research and report back on alternative routes specifically:
  - BRT route that goes from airport directly to Puhinui Station *not* using Puhinui Road, but instead in the area of the rejected West 6 and 7 routes + adjacent to existing train line South of Puhinui Station
  - BRT route on land adjacent to or currently used for the rail link from Puhinui Station to Manukau Station
  - BRT route without the dog-leg through Manukau City Centre – go directly from Manukau Station, to Great South Road, then up Te Irirangi, or up Redoubt to Hollyford down to Te Irirangi.
  - BRT route via the rejected West 6 and 7 routes, from Airport to Manukau and on to Botany without going via Puhinui Station at all
- In relation to section 3 above, and at the same time as reconsidering the need for the BRT route to follow Puhinui/Lambie/Hayman Park/Davies/Ronwood at all, require AT to reconsider, research and report back on the need for the BRT stations that appear to expect relatively low daily passenger boardings as shown in Fig 16 of the ATE including:
  - Lambie Drive
  - Ronwood Ave
  - Diorella, Accent and Smales
  - Also in relation to section 3 above, require AT to reconsider, research and report back on an additional station location between Puhinui Station and SH20 in the vicinity of the intersection of Wyllie Road with Puhinui Road to serve the residential area of western Papatoetoe that not within easy walking distance of Puhinui Station.
  - Also in relation to section 3 above, require AT to reconsider, research and report back on additional station locations between Puhinui Station and the Airport to serve the Manukau Memorial Gardens and the new commercial development occurring on the southern side of SH20b along the proposed BRT route.

- In relation to section 4 above, require AT to reconsider and research and report back on the necessity for this hard infrastructure as a response to the perceived problem.
  - This to include running scenarios of the time it takes to travel by bus now along Te Irirangi Drive from Manukau to Botany, and to trial existing AIR bus Airport-Manukau (no BRT bridge at Puhinui) with Te Irirangi median strip BRT to take passengers directly from Manukau Station to Botany via Te Irirangi Drive rather than on the current 353 or 35 routes.
  - To also include external research into future technologies and their impact on the value/appropriateness of the fixed-route BRT (e.g., self-drive cars/vans that are agile and able to go via any route)
  - To show how AT plans to increase patronage of the current poorly used AIR bus route between Puhinui Station and Manukau Station

## Surplus Designated Land Post-Construction

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Land left-over after construction of BRT – submission on what that land will be used for after construction.

### Reasons for Submission:

If it goes ahead, the BRT will cause massive disruption to the local community. As shown in the Social Impact Assessment, the people who live in NoR 2 and 3 are already in a situation of social deprivation, economically they are not well off, with low household incomes, there are a lot of people renting short-term, it is a relatively transient population despite some people having lived in the area for many years. (In some cases, for generations.) In addition, the Puhinui/South Papatoetoe area is very poorly served with open space and areas for active recreation such as playgrounds. I have had discussions about this in past years with AC parks and community facilities staff who have confirmed this.

The BRT will, effectively, cut the community in half, North to South. There will be some formal road crossings provided, though the location and type of these is yet to be determined. Some may need to be bridged.

The community will need to absorb significant disruption during the construction of the route. The community will be left with a significant new transport route including a large, imposing BRT bridge structure traversing the area.

I am concerned in reading the various NoR documents (see my other submissions) that it appears the left-over land that has been designated and acquired will be used for residential activity after construction of the BRT. (See map in Figure 15 of the AEE.)

The map shows the land not used for the construction of the BRT on the Southern side of Puhinui Road in NoR3, zoned for 'Mixed House Urban Zone – Modified by A2B Team'. Does this mean that any left-over land will be zoned for some sort of intensive residential use? Left over land on the Northern side of Puhinui Road in the area of Puhinui School may also be in a similar situation.

Though I know the philosophy of developing high intensity residential land use near rapid transit stations is embedded in AC's and central government's plans, do we really, truly, want to rely on either the HANA or MANA Airport noise mitigation packages, or 'responsible developers' (Assessment of Traffic Noise Effects p.x) to ensure the people living in such high density residential buildings are adequately protected from the noise, vibration and visual over-looking of a BRT bridge? If the land is zoned Mixed Use Urban Zone, and if this means

people will be living in homes built on land left-over from the construction of the BRT, there need to be strict building *requirements* on developers, that are resolutely enforced by AC.

### Potential for Good

It seems to me, for a number of reasons, that a better way forward for the left-over land would be to rezone as open space and develop a high-quality 'ribbon park' the length of Puhinui Road, linked in with the proposed walking and cycling paths.

A ribbon of green space alongside the BRT could be interspersed with pocket parks, community gardens, basketball courts, and playgrounds. This would 'give back' to a community that has paid a high price for the connectivity of people living and working at Botany and the Airport.

Planting along the green ribbon would add to the visual amenity of the area post-construction, and could also go some way towards government commitments to mitigating the effects of climate change, and the Urban Forest Strategy.

It would also be likely to give 'brownie points' to AT/AC and be a way to bring the community alongside to support the overall BRT project. Engagement in and positivity about the A2B BRT project in the local area is not currently high. If the project were seen to leave something positive for the remaining community in its wake, I think this would go some way to ameliorating people's concerns and mitigating the effects of the BRT construction and operation.

It would help address the lack of public active open space areas in the vicinity, adding to people's health and well-being in what is a socially and economically deprived area. It would also encourage more people to use the walking and cycling aspects of the BRT project. It would mean more people walking and cycling in the area for fun and recreation, rather than just for getting from A to B.

It would also provide something of a green buffer for properties adjoining properties that are to be acquired for the construction of the BRT. Planting trees on the boundary, in particular, would help in some ways to mitigate the visual and noise impacts of the BRT.

### **Seek recommendations:**

- That any left-over designated land be rezoned as open space and developed as a high quality ribbon park with associated facilities along Puhinui Road, Te Irirangi Drive and elsewhere along the BRT route



**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:477] Notice of Requirement online submission - Phisan Charoenmongkhonwilai  
**Date:** Tuesday, 11 April 2023 7:00:09 pm

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The following customer has submitted a Notice of Requirement online submission.

#### Contact details

Full name of submitter: Phisan Charoenmongkhonwilai

Organisation name:

Full name of your agent:

Email address: aungood@gmail.com

Contact phone number: 021428625

Postal address:  
53 Malaspina Place  
Papatoetoe  
Papatoetoe 2025

#### Submission details

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)

The specific provisions that my submission relates to are:  
Related to the property of 3/146 Puhinui Road, Papatoetoe.

Do you support or oppose the Notice of Requirement? I or we are neutral to the Notice of Requirement.

The reason for my or our views are:  
neutral, no comment.

I or we seek the following recommendation or decision from Auckland Council:  
We need to be informed in every step of decision-making as it will affect us as property owner.

Submission date: 11 April 2023

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### Declaration

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.



11 April 2023

File ref: AUP NOR 4a

Planning Technician  
Auckland Council  
Private Bag 92300  
Auckland 1142

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Dear Sir/Madam

**SUBMISSION ON A REQUIREMENT FOR DESIGNATION OF LAND UNDER S.168(2) OF THE RESOURCE MANAGEMENT ACT 1991:**

**NOTICE OF REQUIREMENT FOR BUS RAPID TRANSIT – EXTENSION OF PUHINUI ROAD BETWEEN SH20/20B INTERCHANGE AND ORRS ROAD TO PROVIDE FOR A BUS TRANSIT CORRIDOR AND HIGH QUALITY WALKING AND CYCLING FACILITIES (NOR 4A), BY REQUIRING AUTHORITY: AUCKLAND TRANSPORT**

**To:** Auckland Council

**Name of submitter:** Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand’s historical and cultural heritage. Heritage New Zealand is New Zealand’s lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. HNZPT submission is on the Notice of Requirement for Designation (NoR 4a) in the Auckland Unitary Plan (AUP) to provide for a Bus Rapid Transit corridor, walking, cycling facilities and associated infrastructure.
4. HNZPT acknowledges that the proposed BRT corridor is a significant infrastructure project for Auckland Transport and because it is within a predominantly urban environment there will be changes to the existing environment. It is also understood that there is the need to ensure the city has a transport network that can respond to the “diverse and changing needs” (AEE, page 115) of both the existing communities and future generations. HNZPT supports the purpose of planning for a well-functioning urban environment through the improvement of public transport access and enabling alternative transport facilities such as walking and cycling. HNZPT also supports the protection of the corridor through designation.
5. Nevertheless, of focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA). Historic heritage, being specifically identified as a national importance under Section 6(f) the RMA. The definition of historic heritage under Part 2 of the RMA includes archaeology. Therefore, effects on built heritage and archaeology,



in addition to effects on Mana Whenua must be taken into account by Council when assessing the effects of NoR 4a.

6. While it is stated in the December 2022 report, Assessment of Archaeological Effects that there are no identified archaeological or historic heritage items that will be directly affected there is the possibility for unrecorded sub-surface archaeological sites to exist.
7. The Archaeological report recommends the preparation and implementation of a Historic Heritage Management Plan (HHMP) alongside a 'General Archaeological Authority' as the mitigation mechanisms for the protection and management of historic heritage within the designation corridor.

**The specific parts of the Notice of Requirement that Heritage New Zealand's submission relates to are:**

8. No previous engagement with HNZPT.
9. Section 11 Engagement of the AEE sets out the overview of the partner, stakeholder and public engagement that has been undertaken in informing and development of the NoR 4a documents. This is of concern to HNZPT because of the extent of potential effect the proposed works within the designation corridor will have on known and potential historic heritage.
10. HNZPT does not support the use of the HHMP as it is presently proposed.
11. HNZPT is concerned that while there have been both archaeological and built heritage assessment reports completed for the entire length of the Botany to the Auckland Airport (NoR 1 – 4b) the mitigation of the effect of the designation and future construction of the Bus Rapid Transit corridor, walking and cycling facilities on the known and potential historic heritage will not be managed until the Outline Plan of Works stage.
12. The framework of the proposed HHMP conflates matters relating to historic heritage under the RMA and archaeological requirements provided for under the HNZPTA 2014 with respect to archaeological monitoring, investigation, and reporting. This is an unnecessary duplication of HNZPTA archaeological processes, where the archaeological authority will have its own separate Archaeological Works Plan required to be adhered to under that process.
13. Heritage New Zealand Pouhere Taonga **oppose** the Notice of Requirement (NoR 4a).
14. **The reasons for Heritage New Zealand's position are as follows:**
15. The consideration, management and mitigation of effects from the purpose of the designation on known or potential Historic Heritage should be addressed through the NoR process instead of being deferred to the Outline Plan process.
16. The HHMP duplicates HNZPTA processes, such as an Archaeological Authority that will be required to be obtained before construction; and that should be included at the Outline Plan stage.
17. The protection of historic heritage, and the remedy and mitigation of "any residual" effects are more appropriately addressed through the existing NoR process.



18. Reliance on the Accidental Discovery Protocol with respect to archaeological sites is inappropriate as there is already assessment of the designation corridor that there is the potential for sub-surface archaeology and the need for an Archaeological Authority to be obtained under the HNZPA 2014. Noting that the Accidental Discovery Standards E11.6.1 and E12.6.1 as set out in the Auckland Unitary Plan (Operative in Part) apply where an Archaeological Authority from HNZPT is not otherwise in place.

19. **Heritage New Zealand seeks the following decision from Council:**

20. The objective of the HHMP is rewritten to remove all duplication of processes with the HNZPTA.

21. The purpose of the HHMP should be focussed on the provision details such as:

- Roles, responsibilities and contact details of the project personnel, Requiring Authority's representative, Mana Whenua and HNZPT while are involved with heritage and archaeological matters.
- Provision for access for Mana Whenua to carry out tikanga and cultural protocols.
- Methods for protecting or minimising adverse effects on heritage and archaeological sites within the designation during works (for example fencing to protect form construction works).
- Advice that the Accidental Discovery Standards E11.6.1 and E12.6.1 as set out in the Auckland Unitary Plan (Operative in part) shall apply when an archaeological Authority from HNZPT is not otherwise in place.
- Methods for interpretation and appropriate public dissemination of knowledge gained from heritage investigations.

22. **Heritage New Zealand wishes to be heard in support of our submission.**

23. **If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

Yours sincerely

*BHParslow*

pp for Sherry Reynolds  
Director Northern Region

Address for service: Alice Morris  
[amorris@heritage.org.nz](mailto:amorris@heritage.org.nz)  
PO Box 105 291  
Auckland City 1143

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:497] Notice of Requirement online submission - Abhisekh Mohanlal  
**Date:** Tuesday, 11 April 2023 10:45:09 pm

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The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: Abhisekh Mohanlal

Organisation name:

Full name of your agent:

Email address: abhisekh.mohanlal@gmail.com

Contact phone number: 098276146

Postal address:  
3189A Great North Road  
New Lynn  
Auckland  
Auckland 0600

#### **Submission details**

Name of requiring authority: Auckland Transport

The designation or alteration: Notice of Requirement: Bus Rapid Transit - SH20/20B Interchange to Orrs Road (Auckland Transport)

The specific provisions that my submission relates to are:  
Widening of Puhinui Road

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:

Widening of the road means a loss of land from the family property which would have been useful family space. Widening of the road would lead an increase of vibration from large vehicles like buses and lorries. Puhinui road, in the recent years has alot of housing development due to the zone type. Therefore, being a residential area and the proposed plan of widening the road means an increase in traffic which would lead to high probability of accidents. I believe that the money which would be spent on materials, redoing all the electrical, communication and water lines can be used in better projects or staff rewards. If people are not using current AT services, I don't see a change in human behavior from this plan. Furthermore, with more people working from home and this becoming a growing trend, I don't see the benefit of road widening. NZ has an amazing aim to reduce carbon emissions and road widening don't best align with this goal. Making changes to the current system and removal of trees from my and other properties could lead to increase of flooding, the natural barrier from strong winds increasing chances of land erosion and tornado impact on properties.

I or we seek the following recommendation or decision from Auckland Council:

I seek for the council to oppose/deny the advancement of this NOR or project. I would recommend AT to have a look at other options with the current road system. This could be making roads one-way, increasing the number of traffic signals for better flow of vehicles. Rather than making new bus routes between suburbs, look into having looping bus routes with linking routes which would increase the frequency example city link, inner link and outer link. The use and upgrade of jetties and forming new ferry systems

Submission date: 11 April 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

Form 21

Submission on requirements for designations

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** Aotearoa Towers Group (ATG)  
Private Bag 92161  
Auckland 1142

Chorus New Zealand Limited (Chorus)  
PO Box 632  
Wellington

Connexa Limited (Connexa)  
167 Victoria St West  
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)  
Private Bag 92161  
Auckland 1142

Spark New Zealand Trading Limited (Spark)  
Private Bag 92028  
Auckland 1010

Two Degrees Mobile Limited (2degrees)  
PO Box 8355  
Symonds Street  
Auckland 1150

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the **Telecommunications Submitters**.

**The Proposal:**

This is a submission on the following notices of requirement by Waka Kotahi NZ Transport Agency and Auckland Transport for transport projects from Botany to Auckland International Airport:

- Alteration of Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport;
- Bus Rapid Transit – SH20/20B Interchange to Orrs Road (Auckland Transport)
- Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)
- Rongomai Park to Puhunui Station (in the vicinity of Plunket Avenue) (Auckland Transport)
- Bus Rapid Transit – Botany to Rongomai Park (Auckland Transport)

**The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.**

**The specific parts of the notice of requirement that this submission relates to are:**

The designations in their entirety, and in particular the conditions of the designations that relate to network utilities.

**The Telecommunications Submitters' submission is that:**

The Telecommunications Submitters have no position on the overall Botany to Auckland International Airport package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridor are adequately addressed. The Telecommunications Submitters oppose the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The companies collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also critical for supporting social and economic wellbeing and provides opportunities for work from home/remote work



solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy by supporting measures to reduce travel demand.

This equipment is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. Reasonable access for maintenance and access for emergency works at all times will need to be maintained. In addition, the design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable to trying to retrofit necessary telecommunications/broadband infrastructure later due to disruptions and/or incompatibility with project design.

### **Existing Infrastructure**

A summary of existing infrastructure located in the project footprints is as follows:

- Chorus fibre and copper lines.
- 8 mobile network sites operated by the various mobile network providers.

### **Future Infrastructure Requirements**

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit them at a later date. This process does not always run smoothly. To provide a recent example, Spark has had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage along that length of road. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting it has proved to be very challenging to try to retrofit necessary telecommunications infrastructure into the design of this project.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable, or to not preclude, the development of new network utility including telecommunications infrastructure where practicable to do so. There was

an associated obligation in that condition to report on opportunities considered and whether or not they had been incorporated into the design in the outline plan(s)<sup>1</sup>.

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, a provision to ensure the matter is properly considered during the design phase through consultation with network utility operators, which sets appropriate expectations and ensures these opportunities are properly explored, is reasonable. In the case of telecommunications, this enables proper consideration of making provision for communications that support the function of the road. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which is the focus of the current proposed conditions.

The Telecommunications Submitters seek an equivalent condition to that included in the W2W designation conditions to address this.

### **Consultation with Telecommunications Network Utility Operators**

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design. Whilst the notices of requirement have a Network Utility Management Plan (NUMP) condition, this does not specify who the relevant entities are to be consulted on development of that plan. The Assessment of Environmental Effects for each notice sets out the relevant utility providers who have assets within and around the proposed designations. This specifically includes Chorus (in regard to communications lines). However, the other companies party to this submission are not mentioned and therefore there is a concern they will not be consulted as part of the NUMP development for each stage.

Spark, One NZ and 2degrees operate mobile phone/wireless broadband networks which are often include facilities located in roads. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa, and similarly One NZ has sold its fixed mobile assets to ATG (which will rebrand in due course to FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition is proposed to provide more clarity on which telecommunications/broadband operators may be affected.

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<sup>1</sup> East West Link Condition NU2, W2W Condition 24A

**The Telecommunications Submitters seeks the following decision from the Requiring Authority:**

Amend the NUMP condition by adding an advice note for each notice of requirement as follows:

***Network Utility Management Plan (NUMP)***

- (a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.*
- (b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:
  - (i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;*
  - (ii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
  - (iii) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.**
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) (including Auckland International Airport Limited who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator (including Auckland International Airport Limited) in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator (including Auckland International Airport Limited) shall be considered when finalising the NUMP.*

(g) Any amendments to the NUMP related to the assets of a Network Utility Operator (including Auckland International Airport Limited) shall be prepared in consultation with that asset owner.

**Advice Note:**

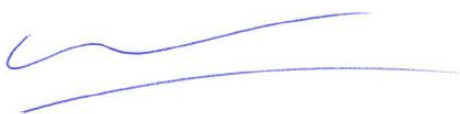
**For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group, Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited and Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).**

Add a new condition to each notice of requirement as follows:

**XX: The Requiring Authority shall consult with Network Utility Operators during the detailed design phase to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.**

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter  
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 5 April 2023

**Address for service of submitter:**

Chris Horne

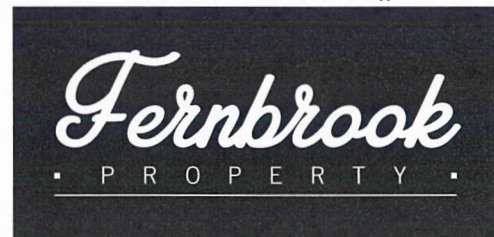
Incite

PO Box 3082

Auckland

**Telephone:** 0274 794 980

**E-mail:** [chris@incite.co.nz](mailto:chris@incite.co.nz)



LEVEL NINE, 148 QUAY STREET  
PO BOX 3515, AUCKLAND 1140  
NEW ZEALAND  
TELEPHONE (64-9) 366 6259

11 April 2023

**Submission on requirement for designation subject to public notification by Auckland Council**

**To:** Auckland Transport

**Name of submitter:** Fernbrook Property (PD) Limited (**Fernbrook**)

This is a submission on a notice of requirement from Auckland Transport for a designation in relation to the provision of a bus rapid transit corridor that connects key destinations from Orrs Road (Auckland Airport boundary), with Manukau City Centre and Botany Town Centre and alterations to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport.

Fernbrook is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Without limitation, the specific parts of the notice of requirement that Fernbrook's submission relates to are Notice of Requirements 4a and 4b (the **NoR**) as it relates to the Puhinui Precinct as described by I432 of the Auckland Unitary Plan (**Precinct**). Fernbrook is the owner of a property at 31 Prices Road. Fernbrook's property is within the Precinct and the Precinct relies upon roading connectivity to Puhinui Road within the NoR, primarily at the signalisation intersection with Campana Road (which will also serve Auckland International Airport Limited's (**AIAL**) proposed Park and Ride facility (**PnR**)).

Fernbrook's submissions are that:

1. Bulk earthworks and civil works within the Precinct are now either complete or substantially underway such that the NoR should take more account of the needs of the Precinct and connectivity to the section of Puhinui Road between Orrs Road and State Highway 20. The NoR references that the signalised intersection with Campana Road will serve AIAL's PnR but that intersection is also the primary connection for the Precinct to Puhinui Road. AIAL have consented a realignment of Prices Road to link to the signalisation intersection with Campana Road but as yet have failed to deliver same, despite the first stage of the PnR now being operational. The NoR

should include the designation of the realignment of Prices Road to link to the signalisation intersection with Campana Road.

2. Until the Precinct is connected by AIAL to the signalised intersection at Campana Road the NoR needs to account for the Precinct's continued reliance upon the existing intersection of Prices Road and Puhinui Road.
3. The NoR also affords the opportunity to provision for traffic associated with the full development of the Precinct. The Precinct establishes a permitted traffic movement threshold but that level was set at a time when the receiving traffic and roading environments were very different to that proposed by the NoR, and the full development of the Precinct will enable greater economic opportunities without any adverse transportation or environmental effects.
4. Auckland Council approved resource consents allocate pro-rata shares of the permitted traffic movements to the various landowners within the Precinct based upon their share of the total gross land area of the Precinct. Those allocations (and the associated monitoring conditions) can be removed in recognition that the roading environment can accommodate the full development of the Precinct. Alternatively, those allocations will need to be revised because the NoR reduces the gross land area of the Precinct.

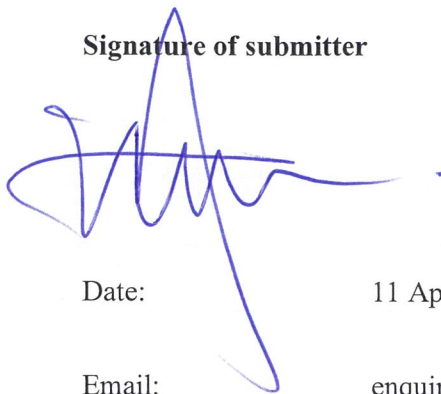
Fernbrook seeks the following recommendations or decisions from Auckland Council:

- That the extent of the NoR be broadened to include the realignment of Prices Road that links to the signalisation intersection with Campana Road. That road, which has yet to be constructed by AIAL, serves as the primary connection for the Precinct to Puhinui Road.
- That, pending the connection by AIAL to the signalised intersection at Campana Road, the NoR accounts for the Precinct's continued reliance upon the existing intersection of Prices Road and Puhinui Road.
- That the NoR recognises the roading environment can now also accommodate traffic associated with the full development of the Precinct.
- That Auckland Council deletes the conditions of consents that allocate a pro-rata share (and associated monitoring) of the permitted traffic movements to the various landowners within the Precinct in recognition the roading environment can now also accommodate traffic associated with the full development of the Precinct. Alternatively, Auckland Council revise those conditions of consent to account for the reduced total gross land area of the Precinct.

Fernbrook wishes to be heard in support of its submission.

If others make a similar submission, Fernbrook will consider presenting a joint case with them at the hearing.

**Signature of submitter**

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke.

Date: 11 April 2023

Email: enquiries@fernbrook.co.nz  
Telephone: 0274 450-039  
Postal address: P.O. Box 911361, Auckland 1142  
Contact person: Alistair White



**SUBMISSION ON AUCKLAND TRANSPORT AND WAKA KOTAHI'S NOTICES OF  
REQUIREMENT FOR THE AIRPORT TO BOTANY BUS RAPID TRANSIT PROJECT BY  
KĀINGA ORA HOMES AND COMMUNITIES**

**TO:** Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1010

*Submission via email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)*

**KĀINGA ORA HOMES AND COMMUNITIES (Kāinga Ora)** at the address for service set out below makes the following submission on the Notices of Requirement (**NoR**) for the Airport to Botany Bus Rapid Transit Project (**The Project**) (Requiring Authority – Auckland Transport and Waka Kotahi).

### **Background**

1. Kāinga Ora was established in 2019 under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government's delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
  - (a) being a world class public housing landlord; and
  - (b) leading and co-ordinating urban development projects.
3. Kāinga Ora's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
  - (a) provide people with good quality, affordable housing choices that meet diverse needs; and

- (b) support good access to jobs, amenities and services; and
  - (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures. In addition to housing, Kāinga Ora has a key interest in critical infrastructure projects to enable housing supply, build-ready land and well-functioning urban environments. Therefore, its interest is across the urban development spectrum.
  5. The public housing portfolio managed by Kāinga Ora in Auckland comprises approximately 30,100 dwellings<sup>1</sup>. Auckland is a priority to reconfigure and grow Kāinga Ora housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
  6. Within Auckland, there are 7,494 applicants on the Ministry of Social Developments housing waitlist as of December 2022<sup>2</sup>, all requiring a range of housing sizes from 1-5+ bedrooms. Of these, 19% are located within the Manukau and Howick Ward's, these being the two wards directly affected by the Project. Combined these comprise approximately 3% of the total area of Auckland, within which there is almost one fifth of the social housing demand. There is high demand for new and existing social housing within the area.
  7. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora interests lie in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
  8. In addition to its role as a public housing provider, Kāinga Ora also has a significant role as a landowner, landlord, and developer of residential housing. Strong

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<sup>1</sup> As of December 2022; <https://kaingaora.govt.nz/publications/housing-statistics/>

<sup>2</sup> Ministry of Social Developments Housing Register December 2022

relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.

9. Kāinga Ora owns land within, adjacent and nearby to the proposed designation subject to this submission. Kāinga Ora has identified approximately 269 sites (comprising 483 units) which will be affected, these comprising:
  - a) 41 sites (50 units) of which are proposed to be fully acquired;
  - b) 48 sites (comprising 160 units) of which are proposed to be partially acquired;
  - c) A further 115 sites (comprising 158 units) are located within 50m of the proposed designation boundaries and 65 sites (comprising 115 units) are located within 50-100m of the proposed designation boundaries, being within the 100m assessment extent and considered a '*Protected Premises and Facility*' (**PPF**) within an urban area<sup>33</sup>; and
  - d) There are approx. 1,230 Kāinga Ora units located within a 1,200m walkable catchment from the 9 proposed rapid transit stops (**RTS**), representing nearly 10% of the total number of dwellings within these walkable catchments, which will positively support and contribute to the patronage of the Bus Rapid Transit (**BRT**) service. In particular, a majority of these Kāinga Ora units (approx. 83.5%) are located between the Ormiston Road and Diorella Drive section of the Project. Kāinga Ora therefore has an interest in ensuring that its tenants' access and connectivity to the RTS are maximised.
10. Tenancies within Kāinga Ora's housing portfolio within the Local Board areas impacted by the Project are very stable, with the current occupancy rate sitting at approximately 99.79%, and the average tenancy length being 11 years. Of those properties proposed to be acquired by the Project, the average tenancy length is 13 years. Most households (comprising a mixture of housing compositions and ages) wish to remain in the area because of their existing connections and close-knit community and for their children to stay within the same school and avoid the disruption of being relocated.
11. Policy decisions made at both central and local government level have impacts on housing affordability and community wellbeing. The challenge of providing affordable housing will require close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land

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<sup>33</sup> NZS6806

supply constraints, infrastructure provisions and capacity as well as an improved urban environment.

12. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing, as well as the well-being of their tenants. This includes the provision of services and infrastructure, and how this may impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (CGH) suppliers.

### **Wider Context**

13. In addition to the above, Kāinga Ora will play a greater role in urban development in New Zealand. The legislative functions of Kāinga Ora, as outlined in the Kāinga Ora Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:
  - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
  - b) providing a leadership or coordination role more generally.
14. Notably, the statutory functions of Kāinga Ora in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first time buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

### *The Government Policy Statement on Housing and Urban Development 2021 ("GPS-HUD")*

15. The GPS-HUD sets a direction for housing and urban development in New Zealand. Its overarching vision is that everyone in New Zealand lives in a home and a community that meets their needs and aspirations. The four main things it sets out to achieve are:
  - (a) **Thriving and resilient communities** – the places where people live are accessible and connected to employment, education, social and cultural opportunities. They grow and change well within environmental limits, support our culture and heritage and are resilient.

- (b) **Wellbeing through housing** – everyone lives in a home, whether it's rented or owned, that is warm, dry, safe, stable and affordable, with access to the support they need to live healthy, successful lives.
- (c) **Māori housing through partnership** – Māori and the Crown work together in partnership so all whānau have safe, healthy, affordable and stable homes. Māori housing solutions are led by Māori and are delivered locally. Māori can use their own assets and whenua Māori to invest in and support housing solutions.
- (d) **An adaptive and responsive system** – Land-use change, infrastructure and housing supply is responsive to demand, well planned and well regulated.

*The National Policy Statement on Urban Development (“NPS-UD”) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (the “RMAA 2021”)*

- 16. The NPS-UD aims to ensure councils better plan for growth and remove overly restrictive barriers to development to allow growth in locations that have good access to services, public transport networks and infrastructure. The NPS-UD’s intensification policies require councils to enable greater heights and densities in areas that are well-suited to growth, such as in and around urban centres and (existing and proposed) rapid transit stops. The RMAA 2021 introduced the Intensification Streamlined Planning Process for tier 1 councils to implement the intensification policies and additionally required these councils to introduce the Medium Density Residential Standards.
- 17. Together, the NPS-UD and RMAA 2021 are intended to ensure New Zealand’s towns and cities are well-functioning urban environments that support housing supply and affordability, accessibility to jobs and services, and emissions reduction.

### Scope of Submission

18. The submission relates to the five NoR's for the Airport to Botany Bus Rapid Transit Project in their entirety.

### The Submission is:

19. Kāinga Ora **supports** the Project and **supports** the NoR's for the Project **in part**, which seeks to undertaken the following works to provide to provide a BRT Corridor and associated walking and cycling facilities<sup>4</sup>:
- (a) Widen the existing Te Irirangi Drive between Botany Town Centre and Rongomai Park (**NoR 1**);
  - (b) Widen numerous roads between Rongomai Park and Plunket Avenue (**NoR 2**);
  - (c) Widen the existing Puhinui Road reserve between Plunket Avenue and the Stage Highway (**SH**) 20/20B interchange, the provision of a BRT bridge to Puhinui Station, and associated widening of streets around Puhinui Station (**NoR 3**);
  - (d) Extension of Puhinui Road Reserve between SH20/20B interchange and Orrs Road (**NoR 4a**); and
  - (e) Widening of SH 20B corridor between SH20/20B and Manukau Memorial Gardens (an alteration to existing designation 6717) (**NoR 4b**)
20. This support is subject to the relief Kāinga Ora seeks being granted and matters raised in its submission being addressed.
21. In particular, but without limiting the generality of the above:
- a) Kāinga Ora supports the outcomes derived from the project particularly as they relate to the delivery of regionally significant transportation infrastructure, enhanced accessibility, and the overall improved rapid transport, walking and cycling provision, however support in part the proposed NoR for the Project. Kāinga Ora considers that the Project will support urban growth and intensification objectives along its alignment, contained within the strategic planning documents, including those within the NPS-UD.

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<sup>4</sup> Refer Section 1 of the AEE for specific details.

- a) Kāinga Ora considers the designation process is appropriate due to the regional significance of the infrastructure proposed and the ability of the designation process to avoid unreasonable delay.
  - b) Kāinga Ora generally supports the proposed conditions of the designation and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects and to regularly communicate with the community, including but not limited to: the submission of an Outline Plan of Works (**OPW**), the Mana Whenua Partnership Forum (**MWPF**), Stakeholder Communication and Engagement Management Plan (**SCEMP**), Development Response Management Plan (**DRMP**), Urban Landscape Design Management Plan (**ULDMP**), Construction Environmental Management Plan (**CEMP**), Cultural Monitoring Plan (**CMP**), Construction Traffic Management Plan (**CTMP**), Construction Noise and Vibration Management Plan (**CNVMP**), Construction Noise and Vibration Management Schedule (**CNVMS**), Historic Heritage Management Plan (**HHMP**); Ecological Management Plan (**EMP**); Tree Management Plan (**TMP**), and a Network Utility Management Plan (**NUMP**).
22. Notwithstanding the general support of the Project, Kāinga Ora considers that further information or details about the project are required. Depending on the outcome of these investigations, there may need to be some changes to designation conditions and/or the design of the project to address the concerns expressed in this submission.

### **Kāinga Ora as a Key Stakeholder**

#### *Displacement of Kāinga Ora Tenants and Customers*

23. As discussed above, Kāinga Ora has a large land holding and associated high numbers of residents that will be affected by the Project, including four community group housing and a transitional housing facility. Kāinga Ora also has a large number of properties and residents within the wider catchment that would be served by the Project. Demand for housing is high within the Project area, and people wish to stay in the area. Kāinga Ora is concerned that the proposal will result in the displacement of at least 212 tenants from 61 Kāinga Ora dwellings which would be removed as a result of the Project. This equates to approximately 14.6% of Kāinga Ora customers and 12.6% of Kāinga Ora managed stock within 100m of the Project's designation

boundary, exacerbating the already significant issues associated of a lack of social housing, in an environment where demand is so high.

24. A number of the Kāinga Ora properties and the associated communities that will be affected by the Project are also subject to the Auckland Unitary Plan's Moderate Aircraft Noise Area Overlay (**MANA**). Kāinga Ora has submitted on the constraints of the MANA Overlay in Proposed Plan Change 78 (**PPC78**). However, the MANA Overlay currently provides for residential development at an average density of one dwelling per 400m<sup>2</sup> for properties located within the MANA. This presents additional significant challenges to Kāinga Ora when attempting to re-home residents in their communities whose dwellings have been acquired by the Project, and presents a potential increased social effect of displacement of these communities. Given the number of Kāinga Ora landholdings within the designation area, engagement with Kāinga Ora should begin at an early stage to address the effects of displacement on Kāinga Ora tenants as a result of the proposed property acquisition.

#### *Property Acquisition*

25. Kāinga Ora is concerned that the Requiring Authority is designating more land than they need to for the Project. It is noted that the designation boundaries are based on 'typical offsets' from similar projects. However, given the designation is proposed to be in place for 15 years, and given the boundaries are likely to impact future development along the Project alignment for some time (and may lead to unintended consequences as a result), Kāinga Ora requests that a more refined approach is adopted to determining the designation boundary. This would ensure that only the minimum amount of land required is designated (for both construction and operational needs), so that efficient and effective land use is not compromised. Kāinga Ora requests that they are involved, as a Key Stakeholder, in undertaking this refinement exercise as it relates to their portfolio.
26. In addition, Kāinga Ora proposes the incorporation of a periodic review condition where the extent of the designation boundary is reviewed every 12 months following the lodgement of OPW(s) to ensure this is being refined continually, and that any land no longer required for construction and operation as a result of the refinement exercise shall be uplifted from the designation.



*Kāinga Ora as a Key Stakeholder*

27. Kāinga Ora considers that they are a key affected party, and support that they have been identified as a key stakeholder by the Requiring Authority. However, as a key stakeholder, and given the significant potential displacement impacts discussed above, Kāinga Ora requests that they are involved specifically in the preparation of management plans and future OPWs for the Project, and seek amendments to the conditions to reflect this. Notwithstanding this, Kāinga Ora considers that the Requiring Authority should be mitigating the effects of the designation now where possible.

**Well-Functioning Urban Environment – Accessibility Improvements***NPS-UD and Proposed Plan Change 78*

28. The NPS-UD seeks to enable intensification within a walkable catchment of existing and planned RTS<sup>5</sup>, as well as enable building heights, densities and urban form in and town centres that are commensurate with the level of community activity with these centres. As well as this, amendments to the RMA require the incorporation of Medium Density Residential Housing Standards (**MDRS**) across all residential zones, with some exceptions.
29. PPC78 implements both the NPS-UD and MDRS. Submissions on PPC78 have closed, and hearings are beginning, however a decision has not yet been made. This has been acknowledged within the Assessment of Environmental Effects (**AEE**) for the Project when discussing the receiving environment<sup>6</sup>.
30. Irrespective of this, the NPS-UD signifies a clear directive to encourage an increase in building heights, development density and urban form not only within, but also around town centres, and existing and planned RTS such as those proposed by the Project. It is expected that this would require an increase in development capacity, height and form along the alignment of the Project, for both residential and commercial / business activities. Likewise, Kāinga Ora considers that providing for such increases in urban form and density are exactly what transport infrastructure projects such as the proposed NoR are seeking to facilitate.

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<sup>5</sup> NPSUD Policy 3(c)

<sup>6</sup> Refer section 7.5 of the Assessment of Environmental Effects

31. In light of the above, and while it is acknowledged that the Project makes significant improvements to cycling and bus infrastructure along the Projects alignment, Kāinga Ora considers that greater emphasis should be placed on the importance of quality Urban Design outcomes, including addressing issues of severance, and improving connectivity, levels of services, travel mode priority and amenity for pedestrians, cyclists and micro-mobility options. These issues are discussed below.

### *Severance*

32. Kāinga Ora acknowledges that the effects of severance already occur along parts of the proposed BRT corridor, particularly along Te Irirangi Drive due to the number of traffic lanes, number of vehicles, the resulting dominance of vehicles and the lack of mid-block crossing points.
33. In addition to this, the block pattern of adjoining land uses, particularly that to the east of Te Irirangi Drive (being made up of numerous cul-de-sacs and dead-end roads) is not very permeable with respects to accessibility for pedestrians or active modes of transport. Consequently, connectivity, particularly at a pedestrian scale, is already restricted in this area.
34. However, Kāinga Ora is concerned that the Project will increase this severance effect further and in turn reduce connectivity by increasing the corridor width and making it harder to cross due to the provision of the central bus lanes. Kāinga Ora is concerned that the Project will further extend this severance from Ormiston Road along towards the Manukau Town Centre and through to Puhinui Road.
35. This severance effect is acknowledged within the AEE, which states<sup>7</sup>:
- “There will be increased community severance as a result of the Project. This is particularly evident on Puhinui Road where the centre running BRT corridor will restrict the ability of pedestrians to cross the road.”*
36. Kāinga Ora is concerned that adequate mitigation of these severance effects has not been provided and that opportunities for improving the effects of severance have not been fully considered. For example, Kāinga Ora is of the view that there are opportunities for additional safe mid-block crossing facilities along the Projects alignment, as well as the potential for additional stations to be provided. Increasing the

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<sup>7</sup> Refer AEE Section 9.6.3

number of mid-block crossings and stations would facilitate increased patronage of the BRT service.

37. As an example, Kāinga Ora has a significant number of tenants between the catchment of Ormiston Road and Dawson Road Stations, where a large residential catchment is serviced and the distance between stations currently proposed is approximately 1,600m. Kāinga Ora considers that a similar opportunity exists at the intersection of Te Irirangi and Hollyford Drives and Boundary Road. Both locations comprise a residential catchment with a high density of Kāinga Ora owned properties that could take advantage of the BRT service. An additional station would be well utilised by these existing and/or future Kāinga Ora tenants, which would in turn facilitate the use, and increase patronage of, the proposed BRT service given the density of customers it would serve.
38. Kāinga Ora requests that these aspects, are explored further in consultation with Kāinga Ora, with suitable changes made to the NoR.

#### *Travel Mode Priority*

39. Kāinga Ora acknowledges that the existing context, particularly the car dominated transport routes that currently make up the current road networks along the Protects alignment, provides significant challenges to achieving best practice urban design outcomes such as a high-quality and high-amenity pedestrian and cycling environment. Likewise, Kāinga Ora acknowledges that the proposal will result in improved provision for public transport, pedestrian and cycling accessibility when compared to the existing context.
40. However, Kāinga Ora considers that the Project provides a significant opportunity to better address these existing issues, and reconsider the arrangement of, and priority given to the various modes of travel. In particular, Kāinga Ora considers that prioritisation of travel modes for pedestrians, cyclists and public transport should be given over the private vehicle to achieve an efficient public transport route. As a result, Kāinga Ora seeks confirmation that Level of Service (**LoS**) for pedestrians, cyclists and public transport will be A, and conditions which specify that the safety and accessibility of active modes, micro-mobility and public transport will be prioritised over the private vehicle.

41. Kāinga Ora also considers that, given the length of the construction project, a key objective of the CTMP should be to provide these users with safe, direct and appealing routes of access during construction.
42. Kāinga Ora acknowledged that the Project proposes the removal of all give-way controlled slip lanes with associated intersection upgrades to “provide fully signalised vehicle and pedestrian movements, further reducing potential conflict with pedestrians and cyclists”<sup>8</sup> and that this has been identified as being one of the reasons where noticeable increases in delay and queue lengths are created. However, Kāinga Ora requests further information regarding how this interface and the treatment of these existing (to be altered) slip roads will be addressed, including how access will be retained while providing for an appropriate LoS for active modes.

#### *Micro-mobility and Active Mode Facilities*

43. Kāinga Ora notes that, as a result of the issues discussed above, many residents within the community will be required to walk long distances to / from the proposed bus stops to the neighbouring residential catchments. In order to mitigate this, and maximise accessibility to and from the proposed stations (and therefore patronage of the Project), Kāinga Ora is of the opinion that it will be important to provide for micro-mobility and active mode facilities at or nearby to the proposed RTS (i.e., cycle or scooter parking or storage etc). Conditions requiring the provision of such facilities when developing OPW are subsequently requested.

#### *Crime Prevention Through Environmental Design*

44. Kāinga Ora supports the requirement to provide details within the ULDM of how the Project promotes a sense of personal safety by aligning with best practice guidelines such as Crime Prevention Through Environmental Design (**CPTED**) principals.

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<sup>8</sup> Refer Transport Assessment

## Flooding

45. The Assessment of Flooding Effects attached to the AEE lists the following positive effect<sup>9</sup>:

*"Raise the existing road levels to preventing flood flows across the road and reducing flood hazard (where this is not limited by existing flooding effects upstream) for road users"*

46. Kāinga Ora is concerned that this positive effect appears to be achieved at the expense of neighbouring properties. In particular, Kāinga Ora notes that proposed condition 14 'Flood Hazard' would enable an increase in the level of flooding toward adjoining properties. As an example, condition 14 proposes that a 10% reduction in free board for existing habitable floors is permitted, and an increase in flood levels of 50mm is permitted where there is no existing dwelling (among others).
47. It is of Kāinga Ora opinion that the Project should be required to manage the flooding effects within its own boundary.
48. Kāinga Ora requests that a flood hazard condition is added so that, simply put, the Requiring Authority does not worsen any flooding effects onto neighbouring properties and appropriately avoids, remediates and/or mitigates the effects of their construction activities.

## Noise and Vibration

### *Construction Noise and Vibration*

49. Kāinga Ora acknowledges that compliance with construction noise and vibration standards are not always practical and supports the management of construction noise and vibration by way of a CNVMP and CNVMS, provided this is in accordance with best practical options and provided the effects of construction noise and vibration are minimised as far as is practical.
50. Kainga Ora requests that they are directly consulted as part of the preparation of the CNVMP and CNVMS.

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<sup>9</sup> Section 4.1 of the submitted Assessment of Flooding Effects

### *Operational Noise and Vibration*

51. It is acknowledged that transport infrastructure is critical to enabling a well-functioning urban environment, and that a degree of noise and vibration emissions are expected. However, it must be recognised that significant noise emissions have potential adverse effects on surrounding residential environments and the health and well-being of people living nearby. Therefore, Operational Noise and Vibration requires careful consideration to ensure that the effects are appropriately avoided, remediated or mitigated in accordance with Section 16 and 17 of the RMA.
52. Kāinga Ora considers that the effect of the Project is a cumulative effect to the noise environment, based on the changes to the roading transport infrastructure since the dwellings within the surrounding environment were built.
53. Kāinga Ora is concerned that the Project does not fully assess the health effects associated with traffic noise of the Project. While the Project assesses the traffic noise effects in the context of NZS6806, Kāinga Ora is concerned that the standard does not fully capture the potential health effects of a proposal. This was raised within the Recommendation for the Notices of Requirement sought for the route protection of the Drury Arterial Network (which in turn took reference and guidance from the Board of Inquiry decision for the Waterview Connection)<sup>10</sup> where it was noted that NZS 6806: potentially discounts the adverse cumulative effects of elevated noise on recipients; inadequately addresses those parts of s.5 (2)(c) of the RMA concerned with avoiding, remedying and mitigating adverse effects; does not engage those parts of Section 7 of the RMA concerned with amenities and the quality of the environment likely to be of concern to impacted persons; and inadequately addresses Section 16 of the RMA (among others).
54. Consequently, Kāinga Ora requests further information regarding the health and safety effects of the Project (i.e., an assessment of these) including the cumulative effects, prior to the hearing. This does not appear to have been provided within the application documents due to the above, and due to the AEE not identifying this as a potential adverse effect.
55. Kāinga Ora notes that Auckland Transport identifies that activities subjected to an operational noise level of 55 dB LAeq require mitigation to address potential adverse

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<sup>10</sup> Refer paragraph 229 of the Recommendation for the Notices of Requirement sought for the route protection of the Drury Arterial Network dated 20 April 2022

health effects. Kainga Ora requests a condition requiring operational noise levels to not exceed 55 dB LAeq beyond the boundaries of the designation or, where exceeded at a sensitive receiver, mitigation is provided.

56. This operational noise level was the baseline utilised within Auckland Transport's Acoustic Expert Evidence by Claire Drewery for Private Plan Change 51 (**PPC51**)<sup>11</sup>, who considered that there are adverse health effects in relation to road traffic, referencing both the World Health Organisation (WHO) Environmental Noise Guidelines for the European Region (2018) and enHealth's The Health Effects of Environmental Noise (2018). The WHO's guidelines are (in part) copied below:

***WHO guidelines for Community Noise 1999 states the following in relation to dwellings***

***[page xiii]***

*... The effects of noise in dwellings, typically, are sleep disturbance, annoyance and speech interference. For bedrooms the critical effect is sleep disturbance. Indoor guideline values for bedrooms are 30 dB LAeq for continuous noise and 45 dB LAm<sub>ax</sub> for single sound events. Lower noise levels may be disturbing depending on the nature of the noise source. At night-time, outside sound levels about 1 metre from facades of living spaces should not exceed 45 dB LAeq, so that people may sleep with bedroom windows open. This value was obtained by assuming that the noise reduction from outside to inside with the window open is 15 dB. To enable casual conversation indoors during daytime, the sound level of interfering noise should not exceed 35 dB LAeq. To protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady, continuous noise should not exceed 55 dB LAeq on balconies, terraces and in outdoor living areas. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound level should not exceed 50 dB LAeq. Where it is practical and feasible, the lower outdoor sound level should be considered the maximum desirable sound level for new development.*

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<sup>11</sup> Paragraphs 6.7 and 6.9 of Statement of Evidence of Claire Drewery on behalf of Auckland Transport – Acoustic, dated 24 August 2021 for Private Plan Change 51 – Drury 2 Precinct.

***WHO Environmental Noise Guidelines for the European Region (2018) states the following***

***[page xiii]***

*Environmental noise is an important public health issue, featuring among the top environmental risks to health. It has negative impacts on human health and well-being and is a growing concern among both the general public and policy-makers in Europe.*

***[page xvi]***

*For average noise exposure, the Guideline Development Group (GDG) strongly recommends reducing noise levels produced by road traffic below 53 decibels (dB) Lden, as road traffic noise above this level is associated with adverse health effects.*

Based on the above, Ms Drewery adopted *55 dB LAeq(24 hour)* as the noise level above which potential health effects could occur and made subsequent recommendations for PPC51. Kainga Ora considers that it is appropriate that that any health effects arising from the operation of the road environment should be addressed and that the NOR should include conditions limiting noise beyond the designation boundary to *55 dB LAeq(24 hour)* consistent with the levels adopted by Ms Drewery. In circumstances where this can not be achieved then noise mitigation to affected receivers should be provided.

57. Kāinga Ora considers that it is appropriate that the Requiring Authority is incentivised to ensure that such measures are undertaken to reduce noise and vibration at source, while at the same time utilising the AUP to manage those effects that cannot be controlled at source, if required.
58. Kāinga Ora submits that there would be a number of advantages with minimising noise and vibration at source that should provide benefits to future residents in surrounding urban areas, namely the ability for existing and future occupants to enjoy greater amenity outside their dwellings. While acoustic attenuation could be an appropriate response to address a health or amenity issue, any reduction of noise (or vibration) at source would enable future residents to enjoy their outdoor living areas, rather than being 'locked-up' in their homes.
59. At the same time, Kāinga Ora submits that there may be circumstances whereby existing dwellings that experience increased exposure to noise and vibration require



further mitigation in the form of building modifications, including but not limited to wall insulation, double glazing, forced ventilation and temperature controls. Kāinga Ora would like to discuss this aspect with the Requiring Authority.

60. Kāinga Ora is concerned that the conditions as drafted are not user friendly, are over complicated and would be difficult to understand for adjoining landowners. Kāinga Ora requests that the conditions are simplified for the benefit of adjoining land owners.
61. Kāinga Ora supports the application of structural mitigation measures (low noise and vibration road surfaces, acoustic barriers insulation, where appropriate) to all roads within the NoR. However, it is sought that where mitigation is applicable along the alignment of the Project, that this offer for mitigation shall stay in perpetuity (i.e. not be limited to three months), until an offer has been taken up, in the interests of natural justice and mitigating adverse health effects for future occupiers.
62. Kāinga Ora requests that condition 28 (Low Noise Road Surface) is amended to require the use of low noise and vibration road surfaces, such as an Asphaltic mix surface, for all road surfaces within this designation, unless further information confirms that this is not warranted from a health and safety perspective.

## **Other Items**

### *Utilities*

63. Kāinga Ora supports the preparation of a NUMP. Kāinga Ora considers that the NUMP should make also provision for potential upgrading and / or future proofing of existing infrastructure and utilities given changing urban environment, uplift in density likely to be facilitated by the Project and preference to avoid disturbance and rework in the future (i.e. post completion).

### *Validity of Advice Note – Designation Boundary*

64. Kāinga Ora has concerns with the validity of the advice note associated with condition 13 (UDLMP) which states that a front yard setback is not required from the designation boundary as the designation is not proposed for road widening purposes. It would appear to Kāinga Ora that the proposal is, at least in part, for road widening to accommodate the Project. A designation cannot modify a rule in the plan, and it is expected that the Council are likely to require the front yard to be taken from the

designated boundary which would potentially result in unintended consequences along the alignment of the Project, and compromise efficient land use and development along the Projects alignment.

#### *Designation Review*

65. The proposed designation conditions include a requirement for the Requiring Authority to review the designation within 6 months of completion of construction or as soon as otherwise practicable (proposed condition 3). While Kāinga Ora generally supports this notion and the intent to do this as soon as is practical, Kāinga Ora considers that the condition should also include a requirement for the Requiring Authority to provide the land in a suitable state once the land is relinquished from the designation and surrendered, in agreement with the property owner.

#### **Relief Sought**

66. Kāinga Ora seeks the following further actions regarding the NoR:
- (a) That the Requiring Authority continues to engage with Kāinga Ora, prior to hearing, on the effects of displacement on Kāinga Ora tenants as a result of the proposed property acquisition.
  - (b) That the Requiring Authority adopts a more 'refined' approach in determining the extent the proposed designation boundary and the construction requirements, to ensure that only the minimum amount of land required is designated, and that the designation boundaries are refined accordingly with details provided prior to the hearing.
  - (c) That the Requiring Authority further explores, in consultation with Kāinga Ora, opportunities for additional safe mid-block crossing points and stations, including but not limited to between Ormiston and Dawson Roads, and at the intersection of Te Irirangi and Hollyford Drives and Boundary Road, as well as safe mid-block crossing points along the Project's length.
  - (d) That the Requiring Authority provides further information regarding how the interface and treatment of existing (to be altered) slip roads will be addressed, including how access will be retained while providing for an appropriate LoS for active modes.

- (e) That the Requiring Authority undertakes an assessment of the health and safety effects of the operational traffic noise, inclusive of the cumulative effects prior to the hearing.
- (f) That the design of the Project is updated to incorporate the full suite of recommendations contained within (a) to (e) above, or alternatively that appropriate conditions are recommended requiring the recommendations within these assessments to be incorporated.

67. Kāinga Ora seeks the following decisions from Auckland Council regarding the NoR:

- (a) That Kāinga Ora, as a key stakeholder, is explicitly included as partners to be involved in the preparation of management plans and future OPW's for the Project, with associated amendments to the conditions to reflect this.
- (b) The provision of a condition that requires the LoS for pedestrians, cyclists and public transport will be 'A' along the Project's length.
- (c) The provision of a condition that requires the safety and accessibility of active modes, micro-mobility and public transport to be prioritised over the private vehicle.
- (d) That condition 18 (CTMP) be amended to identify a key objective of the CTMP as being to provide active and micro-mobility modal users with safe, direct and appealing routes of access during construction.
- (e) The provision of a condition which requires the provision of facilities for micro-mobility and active modes at, or nearby to, RTS as part of future OPW's.
- (f) The provision of a condition which requires that, where property access that exists at the time of submitting the OPW is altered by the Project, that the Requiring Authority shall consult with the directly affected land owner regarding the changes requires and the OPW should demonstrate how safe alternative access will be provided.
- (g) That condition 14 is amended to require the Requiring Authority to ensure that the Project does not worsen any flooding effects onto neighbouring properties and appropriately avoids, remediates and/or mitigates the effects of their construction activities.

- (h) The provision of a condition requiring operational noise levels to not exceed 55dBA beyond the boundaries of the designation and, where exceeded at a sensitive receiver, mitigation to then be provided by the Requiring Authority.
  - (i) That where the operational noise effects require mitigation, that the offer for mitigation is retained in perpetuity, until an offer is taken up.
  - (j) A condition requiring that the Requiring Authority undertake monitoring of operational noise be included within the designation.
  - (k) That condition 28 (low road noise) is amended to require this to be on all roads within the designation.
  - (l) That condition 27 (NUMP) be amended to include a requirement to provide for upgrading and / or future proofing of existing infrastructure and utilities in consultation with key stakeholders, including Kāinga Ora and utility providers.
  - (m) That condition 13 (ULDMP) is amended as attached in Attachment A.
  - (n) That condition 3 (Designation Review) should be amended to:
    - (i) add a clause requiring the Requiring Authority to, once the land is relinquished from the designation, leave the subject land in a suitable condition in agreement with the property owner/s; and
    - (ii) add a clause requiring the Requiring Authority to assess in conjunction with the land owner, every 12 months following the lodgement of OPW(s), whether any areas of the designation that have been identified as required for construction purposes are still required, and identify any areas that are no longer required, and give notice to the Council in accordance with section 182 for the removal of those parts no longer required.
  - (o) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.
  - (p) Any other alternative or consequential relief to give effect to this submission.
68. In the absence of the relief sought, Kāinga Ora considers that the NoR:

- (a) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
  - (b) will compromise urban development outcomes;
  - (c) will in those circumstances impact on the ability of people and communities to provide for their social, economic and cultural wellbeing.
69. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
70. Kāinga Ora wishes to be heard in support of its submission.
71. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at hearing.

**Dated** this 11<sup>th</sup> day of April 2023



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**Brendon Liggett**  
Manager – Development Planning  
Kāinga Ora Homes and Communities

**ADDRESSES FOR SERVICE:**

Campbell Brown Planning Ltd  
PO Box 147001  
Auckland  
Attention: Michael Campbell  
Email: [michael@campbellbrown.co.nz](mailto:michael@campbellbrown.co.nz)

Kāinga Ora – Homes and Communities  
PO Box 74598  
Greenlane, Auckland  
Attention: Jennifer Chivers  
Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)

## Attachment A: Proposed Amendments to ULDMA

**Urban and Landscape Design Management Plan (ULDMP)**

- (a) A ULDMP shall be prepared **in consultation with key stakeholders** prior to the Start of Construction for a Stage of Work.
- (b) Mana Whenua shall be invited to participate in the development of the ULDMP(s) at least six (6) months prior to the start of detailed design for a Stage of Work to provide input on cultural landscape and design matters. This shall include (but not be limited to) how desired outcomes for the management of potential effects on cultural sites, landscapes and values identified and discussed in accordance with the Historic Heritage Management Plan (Condition **Error! Reference source not found.**) and the Ecological Management Plan (Condition **Error! Reference source not found.**) may be reflected in the ULDMP
- (c) The objective of the ULDMP(s) is to:
- (i) enable integration of the Project's permanent works into the surrounding landscape, **communities**, and urban context;
  - (ii) **ensure that the project integrates with the existing and proposed active mode network;**
  - (iii) **ensure that the Project provides for high levels of accessibility and safety for all users;**
  - (iv) ensure that the Project manages potential adverse landscape and visual effects as far as practicable and contributes to **the experience of** a quality urban environment **for people and communities;** and
  - (v) acknowledge and recognise the whakapapa Mana Whenua have to the Project area.
- (d) The ULDMP shall be prepared in general accordance with:
- (i) Auckland Transport's Urban Roads and Streets Design Guide;
  - (ii) Waka Kotahi Urban Design Guidelines: Bridging the Gap (2013) or any subsequent updated version;
  - (iii) Waka Kotahi Landscape Guidelines (2013) or any subsequent updated version;
  - (iv) Waka Kotahi P39 Standard Specification for Highway Landscape Treatments (2013) or any subsequent updated version; ~~and~~
  - (v) **Waka Kotahi Urban Street Guide;**
  - (vi) Auckland's Urban Ngahere (Forest) Strategy or any subsequent updated version; ~~;~~
  - (vii) **Auckland Council's Auckland Design Manual; and**
  - (viii) **Auckland Council's Transport Emissions Reduction Pathway**
- (e) To achieve the objective, the ULDMP(s) shall provide details of how the project:
- (i) is designed to integrate with the adjacent urban (or proposed urban) and landscape context, including the surrounding existing or proposed topography, urban environment (i.e. centres and density of built form), **community infrastructure,** natural environment, landscape character and open space zones;

- (ii) provides appropriate **high quality and safe** walking and cycling **and micro-mobility** connectivity to, and interfaces with, existing or proposed adjacent land uses, public transport infrastructure and walking and cycling connections **(particularly to/from nearby centre and neighbourhoods (such as Otaru), including facilities at stations, such as cycle storage and micro mobility facilities;**
  - (iii) promotes inclusive access (~~where appropriate~~); and
  - (iv) promotes a sense of personal **and public** safety by aligning with best practice guidelines, such as:
    - A. Crime Prevention Through Environmental Design (CPTED) principles;
    - B. Safety in Design (SID) requirements; and
    - C. Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures.
  - (v) provides opportunities to incorporate Mana Whenua values and cultural narrative through the design. This shall include but not be limited to:
    - A. how to protect and enhance connections to the Māori cultural landscape
    - B. how and where accurate historical signage can be provided along the corridor;
    - C. how historical portage routes will be recognised;
    - D. how opportunities for cultural expression through, for example mahi toi, art, sculptures or other public amenity features will be provided;
    - E. how opportunities to utilise flora and fauna with a specific connection to the area are realised where possible by:
      - a. preserving them in the design and maintenance of the Project;
      - b. restoring them in a manner that recognises their historical and cultural significance. For example by clustering planting to represent a lost ngahere; and
    - F. how the historic and cultural significance of the Puhinui Historic Gateway is recognised; and
    - G. how, public access to coastal areas, waterways and open space is enhanced, where appropriate.
  - (vi) provides for an integrated stormwater management approach which prioritises in the following order:
    - A. opportunities for ki uta ki tai (a catchment scale approach);
    - B. opportunities for net catchment benefit;
    - C. green infrastructure and nature-based solutions; and
    - D. opportunities for low maintenance design.
- (f) At the discretion of Mana Whenua, the matters listed in (e)(v) – (vi) shall either be incorporated into the ULDM or prepared as a separate plan.
- (g) The ULDM(s) shall include:
- (i) a concept plan – which depicts the overall landscape and urban design concept, and explain the rationale for the landscape and urban design proposals;

- (ii) developed design concepts, including principles for **micromobility**, walking and cycling facilities and public transport; and
  - (iii) landscape and urban design details – that cover the following:
    - A. road design – elements such as intersection form, carriageway gradient and associated earthworks contouring including cut and fill batters and the interface with adjacent land uses, benching, spoil disposal sites, median width and treatment, roadside width and treatment;
    - B. roadside elements – such as lighting, fencing, wayfinding and signage;
    - C. architectural and landscape treatment of all major structures, including bridges and retaining walls;
    - D. architectural and landscape treatment of noise barriers;
    - E. landscape treatment of permanent stormwater control wetlands and swales;
    - F. integration of passenger transport;
    - G. **micro-mobility**, pedestrian and cycle facilities including **parking/ storage**, paths, road crossings and dedicated pedestrian/ cycle bridges or underpasses;
    - H. **property access - including how access to adjacent sites is affected, what changes are proposed and what provision has been made to retain existing levels of amenity and functionality;**
    - I. **interfaces – how the interface with adjoining properties has been treated, including the treatment / interface with existing slip roads;**
    - J. historic heritage places with reference to the HHMP (Condition 23); and
    - K. re-instatement of construction and site compound areas, driveways, accessways and fences.
- (h) The ULDMP shall also include the following planting details and maintenance requirements:
- (i) planting design details including:
    - A. identification of existing trees and vegetation that will be retained with reference to the Tree Management Plan (Condition 26). Where practicable, mature trees and native vegetation should be retained;
    - B. street trees, shrubs and ground cover suitable for berms;
    - C. treatment of fill slopes to integrate with adjacent land use, streams, riparian margins and open space zones;
    - D. planting of stormwater wetlands;
    - E. identification of vegetation to be retained and any planting requirements under the Ecological Management Plan (Condition 25) and Tree Management Plan (Condition 26);
    - F. integration of any planting requirements required by conditions of any resource consents for the project; and
    - G. re-instatement planting of construction and site compound areas as appropriate.
  - (ii) a planting programme including the staging of planting in relation to the construction programme which shall, as far as practicable, include provision for



planting within each planting season following completion of works in each Stage of Work; and

- (iii) detailed specifications relating to the following:
- A. weed control and clearance;
  - B. pest animal management (to support plant establishment);
  - C. ground preparation (top soiling and decompaction);
  - D. mulching; and
  - E. plant sourcing and planting, including hydroseeding and grassing, and use of eco-sourced species.

Watercare Services Limited

73 Remuera Road, Remuera,  
Auckland 1050, New ZealandPrivate Bag 92521, Victoria Street West,  
Auckland 1142, New Zealand

Telephone +64 9 442 2222

[www.watercare.co.nz](http://www.watercare.co.nz)

**Submission on the Notices of Requirement for the Airport to Botany Bus Rapid Transit Project lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991**

**TO:** Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

**SUBMISSION ON:** Notices of Requirement ("**NoRs**") for the Airport to Botany Bus Rapid Transit Project

**FROM:** Watercare Services Limited ("**Watercare**")

**ADDRESS FOR SERVICE:** Mark Bishop  
Regulatory & Policy Manager  
Watercare Services Ltd  
Private Bag 92 521  
Wellesley Street  
AUCKLAND 1141  
Phone:022 010 6301  
Email: [Mark.Bishop@water.co.nz](mailto:Mark.Bishop@water.co.nz)

**DATE:** 11 April 2023

## 1. INTRODUCTION

1.1 Watercare is pleased to have the opportunity to make a submission on the five NoRs for the Airport to Botany Bus Rapid Transit Project ("**Project**") lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**"), and in particular:

- (a) NoR lodged by Waka Kotahi NZ Transport Agency to alter Designation 6717 State Highway 20B - State Highway 20 to Auckland International Airport;
- (b) NoR lodged by Auckland Transport for a new designation to widen Puhinui Road between the SH20/SH20B Interchange and Orrs Road to provide for a Bus Rapid Transit corridor and walking and cycling facilities;
- (c) NoR lodged by Auckland Transport for a new designation to widen the existing Puhinui Road between Plunket Avenue and east of the SH20/SH20B Interchange to provide for a Bus Rapid Transit corridor and walking and cycling facilities;
- (d) NoR lodged by Auckland Transport for Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue); and

(e) NoR lodged by Auckland Transport for a new designation to widen Te Irirangi Drive between Botany and Rongomai Park to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

1.2 Watercare recognises the aim of the NoRs is to improve connections between the major centres of Botany, Manukau, Auckland Airport and their employment areas to existing and intensifying residential areas in southern and eastern Auckland.

1.3 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

1.4 Watercare could not gain an advantage in trade competition through this submission.

## 2. WATERCARE – OUR PURPOSE AND MISSION

2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.

2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated three waters infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.

2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.<sup>1</sup>

2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan and the Auckland Future Urban Land Supply Strategy.

2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.<sup>2</sup>

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<sup>1</sup> LGA, s 59.

<sup>2</sup> Local Government (Auckland Council) Act 2009, s 57.

### 3. SUBMISSION POINTS AND RELIEF SOUGHT

- 3.1 This is a submission on all the NoRs that were publicly notified on 10 March 2023. In particular, this submission relates to the NoRs as they may potentially impact or interact with existing, or potential future, water and wastewater services.
- 3.2 Watercare recognises the aim of the NoRs is to improve connections between the major centres of Botany, Manukau, Auckland Airport and their employment areas to existing and intensifying residential areas in southern and eastern Auckland.
- 3.3 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies, or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.
- 3.4 Watercare acknowledges the proactive process to engagement from Waka Kotahi and Auckland Transport during the development of these NoRs including through discussions with the Supporting Growth Alliance, and the project work that preceded the Future Urban Land Use Strategy.
- 3.5 Watercare would like to ensure that in the future there is an active and continual process set up by the requiring authorities to recognise that third party infrastructure providers, including Watercare, have asset management and construction plans that are constantly updating and changing and that these updates and changes should be taken into account by the requiring authorities when the Project is developed further.
- 3.6 To that end, Watercare seeks to be engaged before detailed design and during the ongoing design phases to identify opportunities to enable, or otherwise not preclude, the development of new infrastructure within the Project areas. For example, this could involve the development of an "Infrastructure Integration Plan" prior to detailed design with third party infrastructure providers like Watercare (which can also be updated throughout construction of the Project) to ensure that the Project takes into account and appropriately integrates with potential future infrastructure like wastewater and water services.
- 3.7 It is expected that such an "Infrastructure Integration Plan" could include details of engagement undertaken (including any feedback from infrastructure providers), identify other potential infrastructure that may be developed within the Project areas and how the requiring authorities have enabled or otherwise not precluded the development of such infrastructure within the Project areas.
- 3.8 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as this Project develops.
- 3.9 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare,

this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).

- 3.10 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the Project does not impact its wastewater and water services in the Project area now and into the future. Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

#### 4. **RECOMMENDATION SOUGHT**

- 4.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the NoRs, including by way of conditions to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

- 4.2 Watercare wishes to be heard in support of this submission.

- 4.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Mark Bourne  
**Chief Operations Officer**  
**Watercare Services Limited**

**FORM 21**

**Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991.**

To: Auckland Council

**Name of submitter:** Ministry of Education - Te Tāhuhu o te Mātauranga ('the Ministry')

Address for service: Eden 5, Level 3/12-18  
Normanby Road  
Mount Eden  
Auckland 1011

Attention: Gemma Hayes

Phone: +64 963 80294

Email: [gemma.hayes@education.govt.nz](mailto:gemma.hayes@education.govt.nz)

**This is a submission on the Supporting Growth's Notice of Requirement for Airport to Botany Bus Rapid Transit – Notice of Requirement 4a (NoR 4a) - SH20/20B Interchange to Orrs Road**

This submission relates to the potential road safety effects on students in Puhinui and Manukau from heavy construction traffic.

**Background:**

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Auckland region.

**The Ministry of Education's submission is:**

Under the Resource Management Act 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.

Through its delivery partner, Supporting Growth, Waka Kotahi NZ Transport Agency and Auckland Transport have lodged five Notice of Requirements (NoRs) between Botany and Auckland Airport. The NoRs will collectively enable the construction of a Bus Rapid Transit (BRT) corridor to allow better transportation between Auckland Airport and Botany. The project will also enable stronger walking and cycling facilities. The project aims to respond to poor mode share, access to employment, and increased pressure on transport networks due to residential intensification in the area.

The Ministry broadly supports the project’s aim to enable better public and active modes of transportation in South Auckland. However, there are a number of schools around the project corridor that could be affected by the construction of the BRT corridor, as seen in Figure 1. The Ministry seeks for potential heavy construction traffic effects on the safety of schools across the five NoRs to be appropriately addressed and managed. The Ministry’s specific concerns are outlined below.

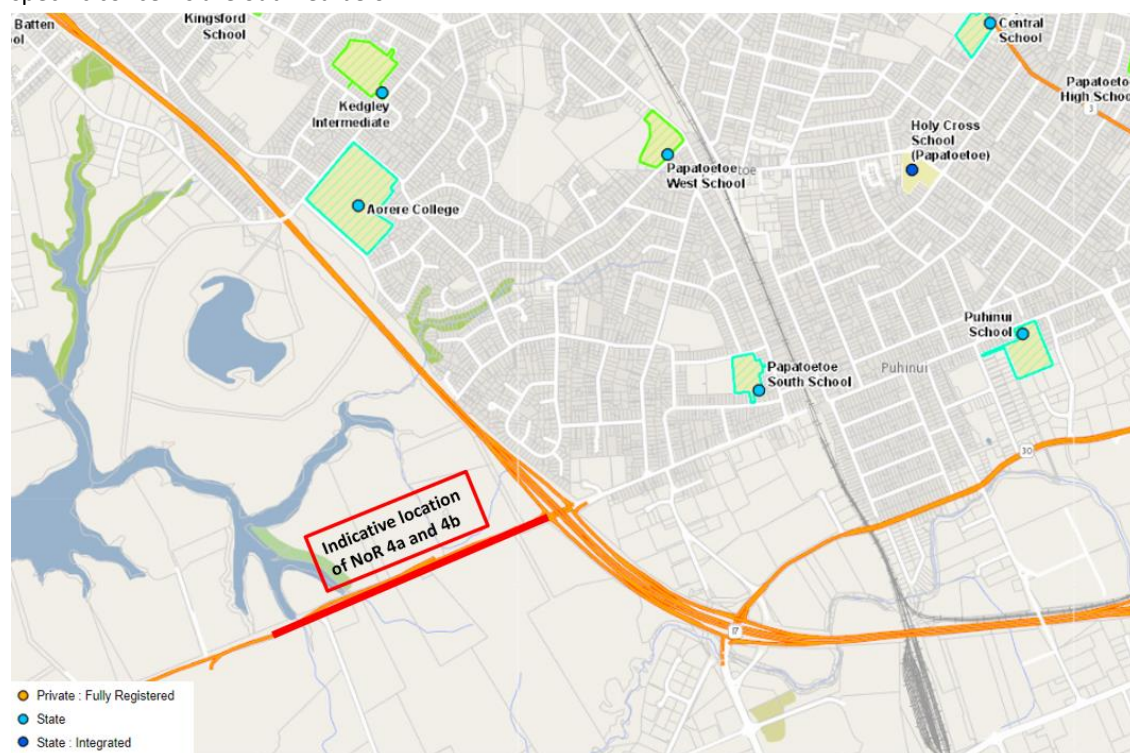


Figure 1: location of schools in relation to NoR 4a and 4b

**Construction traffic effects:**

Supporting Growth has outlined that a Construction Traffic Management Plan (CTMP) will be prepared prior to the start of construction, which will include details on how to manage heavy construction traffic near schools. It will include specific non-working or non-movement hours around schools. Supporting Growth has identified Puhinui School as a school that needs to be considered in the CTMP. No other Ministry schools have been identified.

The Ministry appreciates Supporting Growth’s willingness to prioritise student safety during construction. There is other schools nearby besides from Puhinui School that should also be considered in the CTMP. These include Papatoetoe West School and Papatoetoe South School that are located near the proposed BRT corridor (NoR 4a) and there is the potential for these schools to be affected by heavy construction traffic given they are located on a

potential construction traffic route. The Ministry requests that these schools be included in the CTMP and all heavy construction vehicles must avoid these schools at peak pick-up and drop-off times to maintain a safe environment for students get to and from school.

The Ministry requests a designation condition outlining the details to be included in the CTMP on how all heavy construction vehicles must avoid schools during pick-up and drop-off times. We have proposed a condition below. There is a diverse road network that surrounds the project corridor, resulting in multiple alternative construction routes around the schools/roads we have proposed to be avoided. Therefore, we do not see the acceptance of this condition to hinder Supporting Growth's construction programme.

### Decision sought

The Ministry is neutral on the Airport to Botany NoRs if Council accepts the following relief and any consequential amendments required to give effect to the matters raised in this submission.

The Ministry requests the following designation conditions:

1. The Construction Traffic Management Plan shall include details on how all heavy construction vehicles must avoid the schools at peak school pick up and drop off times (during term time only) outlined in the table below. It is noted that new schools could establish around the project area before construction commences. Any new school on an identified construction route must be added to the table below. Engagement should be undertaken with the Ministry to confirm the information in the table below is still accurate closer to the time of construction.

Table 1: Schools that heavy construction vehicles must avoid at peak school pick-up and drop-off times

School Name	Address	Associated no travel route	Times heavy vehicles must avoid the schools (based off each school's individual start and finish times) <sup>1</sup>
NoR 4a			
Puhinui School	116 Puhinui Road, Papatoetoe, Auckland 2104	Puhinui Road (between Clendon Avenue and Greath Souh Road)	8.10am to 8.50am 3.00pm to 3.30pm
Papatoetoe West School	1 Hillcrest Road, Papatoetoe, Auckland 2025	Station Road	8.15am to 9.00am 2.45pm to 3.15pm
Papatoetoe South School	58A Milan Road, Papatoetoe, Auckland 202	Kenderdine Road and Milan Road	8.10 – 8.50am 3.00pm to 3.30pm

<sup>1</sup> Typically the morning school drop-off period is longer than the afternoon pick-up period. This is why on average we have requested a 45min window where trucks must avoid the schools in the morning. The afternoon peak pick-up period is typically shorter with students leaving the school grounds as soon as class finishes, which is why we only request a 30min window (on average) for the afternoon peak.





The Ministry looks forward to working with Supporting Growth to manage construction traffic effects on student safety.

**The Ministry wishes to be heard in support of its submission**

**Gemma Hayes**

**Principal Planning Advisor**

**Ministry of Education**

**Date: 11 April 2023**

**SUBMISSION ON REQUIREMENT FOR DESIGNATION THAT IS SUBJECT TO  
PUBLIC NOTIFICATION UNDER SECTION 168 OF THE RESOURCE  
MANAGEMENT ACT 1991**

**To:** Auckland Council ("**Council**")

**Name:** Auckland International Airport Limited ("**Auckland Airport**")

**Submission on:** Notice of Requirement 4a from Auckland Transport for the construction, operation and maintenance of an extension to Puhinui Road between the SH20/20B Interchange and Orrs Road to provide for a bus rapid transit corridor, walking and cycling facilities and associated infrastructure ("**NoR 4a**")

**Introduction**

1. Auckland Airport is New Zealand's largest and busiest airport with over 21 million passengers, at its peak pre-Covid-19 and 20,000 people, across more than 200 businesses, employed in and around the airport.
2. The Airport is a strategic infrastructure asset of local, regional and national importance. As the primary gateway to New Zealand, Auckland Airport is a significant contributor to our regional and national economies.
3. Auckland Airport owns approximately 165 hectares of land within the Puhinui area to the east of the Airport (part of which is subject to Auckland Airport's Designation 1100). Puhinui Road / State Highway 20B provides the only eastern access into the Airport Precinct. As a critical access to the Airport, Auckland Airport has a direct interest in NoR 4a and is concerned to ensure connectivity along this corridor is maintained and enhanced to provide for longer term growth in an efficient manner.
4. Auckland Airport could not gain an advantage in trade competition through this submission.

**Scope of submission**

5. This submission relates to NoR 4a in its entirety.

**Nature of submission**

6. Auckland Airport generally supports the works proposed in NoR 4a which seek to enable the provision of public transport and active mode corridors, and to provide improved transport choices for users of the eastern access corridor to the Airport. Auckland Airport recognises the importance of providing a wide range of transport options for passengers, customers and staff to get to and from the Airport reliably and safely. Greater provision of public and active modes of transport is central to ensuring sustainable and efficient functioning of the transport network to, from and within the Airport Precinct into the future.

7. Auckland Airport seeks to ensure the works enabled through NoR 4a do not adversely affect, and appropriately integrate with, Auckland Airport's planning and development of the eastern access to the Airport, and surrounding Puhinui area.
8. As part of its long-term masterplanning for the land use and development of the Airport Precinct, Auckland Airport has been actively planning (over many years) improvements to its transport network, including the eastern access to and from the Airport. Auckland Airport recognises any changes to its roading network will have implications for the wider transport system and has been working collaboratively with Auckland Transport and Waka Kotahi NZ Transport Agency in relation to the improvements to the eastern access corridor (including the works proposed in NoR 4a) in order to ensure the roading networks are appropriately integrated.
9. Part of Auckland Airport's landholdings adjacent to Puhinui Road are being developed for a new Park and Ride facility to better service the growing needs of the Airport's customers and employees, and reduce traffic flows through the Airport Precinct. Auckland Airport is also actively planning for the provision of new utilities on its landholdings along the Puhinui Road corridor which are fundamental to Auckland Airport's operations, including fuel pipelines and the electricity intake needed for support the next generation of sustainable aircraft.
10. While the parties have worked (and continue to work) closely together, Auckland Airport is concerned NoR 4a (in its current form) does not make adequate provision for, or integrate with, Auckland Airport's (current and future) operational needs.

**General reasons for submission**

11. The general reasons for this submission are that NoR 4a (as currently proposed), if granted may not appropriately provide for the necessary integration with the Airport's utilities and operational needs and as such:
  - (a) will not promote the sustainable management of the natural and physical resources in Tāmaki Makaurau, and is therefore contrary to or inconsistent with Part 2 and other provisions of the Resource Management Act 1991;
  - (b) is inconsistent with other relevant planning documents, including the Auckland Unitary Plan;
  - (c) will not meet the reasonably foreseeable needs of future generations;
  - (d) will not enable the social, economic and cultural wellbeing of the people of Tāmaki Makaurau; and
  - (e) does not avoid, remedy or mitigate actual and potential adverse effects on the environment.

**Specific reasons for submission**

12. Without limiting the generality of paragraph 10 above, Auckland opposes NoR 4a on the basis that the works (once completed) will not allow adequate space for Auckland Airport to construct and provide for utilities that are necessary to service the operational needs of the Airport.
13. The Airport is also concerned that stormwater infrastructure for the corridor could adversely affect Auckland Airport's land through discharges or otherwise. It is critical that infrastructure required for the NoR is appropriately designed and located so as not to unduly interfere with activities on the Airport's land.
14. While the proposed conditions make some provision for network utility operators (including Auckland Airport) with existing infrastructure within the extent of NoR 4a (including draft conditions 6 and 27), the proposed conditions do not adequately provide for ongoing and future operating needs of the Airport.
15. Auckland Airport is also concerned to ensure appropriate conditions are included in NoR 4a to avoid, remedy or mitigate adverse effects on Auckland Airport's landholdings and operations during construction, including effects on traffic and the transport network, and that there are ongoing commitments for engagement and coordination with key stakeholders, such as Auckland Airport.

**Recommendation sought**

16. Auckland Airport seeks that the Council recommends:
  - (a) amendments to NoR 4a, including by way of conditions to address Auckland Airport's concerns; and
  - (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.
17. Auckland Airport wishes to be heard in support of this submission.
18. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

**AUCKLAND INTERNATIONAL AIRPORT LIMITED** by its solicitors and authorised agents Russell McVeagh:

**Signature:**

Allison Arthur-Young

**Date:**

11 April 2023

**Address for Service:** C/- Taylor Mitchell  
  
Russell McVeagh  
Barristers and Solicitors  
Level 30  
Vero Centre  
48 Shortland Street  
PO Box 8/DX CX10085  
**AUCKLAND 1140**

**Telephone:** +64 9 367 8000

**Email:** [taylor.mitchell@russellmcveagh.com](mailto:taylor.mitchell@russellmcveagh.com)

## Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991  
FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to:

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

### **Submitter details**

**Organisation Name (if submission is made on behalf of Organisation)**

Te Ākitai Waiohua Waka Taua Trust

**Address for service of Submitter**

PO Box 59 185  
Mangere Bridge  
Auckland, 2151

Telephone: 021500054

Email: [karen.a.wilson@xtra.co.nz](mailto:karen.a.wilson@xtra.co.nz)

Contact Person: Karen Wilson

**This is a submission on the following notices of requirement:**

Requiring authority	NOR	Description
Waka Kotahi NZ Transport Agency	4b	Alternation to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport
Auckland Transport	4	Bus Rapid Transit – SH20/20B Interchange to Orrs Road
Auckland Transport	3	Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange
Auckland Transport	2	Bus Rapid Transit – Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue)
Auckland Transport	1	Bus Rapid Transit – Botany to Rongomai Park

**The specific parts of the above notice of requirement that my submission relates to are:**

The proposed conditions for NORs 1 to 4a.

**My submission is:**

We are neutral on the notices of requirement.

**The reasons for my views are:**

Te Ākitai Waiohua have lived on these lands since time immemorial. This is our whenua – we have no alternatives. The proposed Bus Rapid Transit will traverse through our rohe and cultural landscape. The scale of the project will have significant adverse effects on the cultural landscape of Te Ākitai Waiohua. As a principal partner to the project, Te Ākitai Waiohua have worked with the project team to develop a set of conditions that will ensure these effects will be appropriately managed as the project is developed.

Te Ākitai Waiohua Waka Taua Trust is neutral on the notices of requirement provided the proposed conditions are retained as requested to ensure ongoing participation in the project.

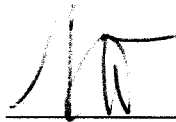
In particular, condition 5 is supported and must be retained because the project will not commence for many years. Condition 5 provides certainty that Te Ākitai Waiohua is recognised as Mana Whenua and as a partner to this project. Governments and people involved in the project will change over the life of a designation and therefore condition 5 is required to ensure there is no ambiguity in the future. Without condition 5 the hard work of those involved in the project over the past few years and the partnership achieved would be at risk.

**I seek the following recommendation or decision from the Council**

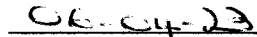
Retain Condition 5 to ensure certainty is provided that Te Ākitai Waiohua is Mana Whenua and a partner on this project.

I wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
*(or person authorised to sign on behalf of submitter)*



Date





# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A,169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Wendy Jane Rodger

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

22 Cambridge Terrace

Papatoetoe

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By:: Name of Requiring Authority	Waka Kotahi NZ Transport Agency
For: A new designation or alteration to an existing designation	Alteration to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport

The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

Affected properties - 22 Cambridge Terrace, Papatoetoe

My submission is:

I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
I or we are neutral to the Notice of Requirement

The reasons for my views are:

I will be looking to sell my house within the next two years? And once you lodge this it will be very hard for me to sell.

Unless you comit to puchasing my properly when I am ready to sell and I do not have to wait until you have funds to purchase my property.

My CV went up last round and so did my rates by \$1100 per year. I am expecting to sell my property for at least the CV.

The reason for selling is for my retirment which I have been planing for a few years now so this coming over my property is not good.

You say you will purchase for market value in approx 10 - 15 years etc. I can not wait that long.  
I am hoping that you will come and discuss with me and purchase my property earlier than that. #01  
I have earlier spoken with Supporting Growth when this first come out and they said that possibly  
you will agree to purchase my property earlier that the 10 -15 years etc.

(continue on a separate sheet if necessary)

**I seek the following recommendation or decision from the Council** (give precise details including the general nature of any conditions sought).

That when I am ready to sell in either 2024 or 2025 that they will purchase my property for at least what the CV is if not more?

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

W.S. Rodger  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

03/16/2023  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

5 April 2023

Planning Technicians  
Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Dear Sir

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

In response to Auckland Council letter dated 10 March 2023.

We are the residents on Puhinui road, Papatoetoe and will object to destination process on our property/properties. There are many reasons that the vulnerable residents will impact from this construction and the livelihood and wellbeing of the residents will be lost.

The Auckland transport failed to provide a proper consultation with the residents of Puhinui road. The only two letters as dated received by the residents and Auckland transport neglected proper process.

There was one of the so-called 'community engagement' summaries in 2019 we found by digging through many layers of documents online. The residents of Puhinui road were not consulted or any information been shared.

The AT has failed to inform the affected residents and the owners were shocked when they received a letter that our property is at risk. It is a very unfair process and AT only consulted the general public and received only their opinion to increase the in favour of the project. AT has failed to door knock and spoke to the affected individuals.

The costs for the project will be over 2 billion, but Auckland transport has undervalued the cost to win funding from the government. It's a cunning plan from day one when AT never worked on true figures and hardly contacted or get public views for this project.

Not many have or excess to internet and some have English speaking difficulty. AT is trying to take away people's pride and many family homes without even their consent and proper consultation. Many people are not even aware that AT is interested in their property and to replace it with Bus line.

1. Puhinui residents are not aware of any partners and key stakeholders: presentations, small group meetings and one-on-one meetings as required; • potentially affected property owners/occupiers and businesses within the programme area: mail drops/ flyer, community open days, online information, visualisation, and one-on-one meetings as required; and • general public: community open days, online information and visualisation as stated by Auckland Transport.

2. We are appalled that AT seems to think we, as residents, have been 'consulted'. The maps used are very broad and general, and it is only with the benefit of hindsight that we can read them and see anything other than the bus lanes that have already been installed.
3. Apparently 'affected residents' only get few mails drop as dated above and chances to attend a couple of 'consultation' event via Teams. The businesses were meant to have had a 'drop in' from AT reps, though the ones we have spoken to have no recollection of such drop ins.
4. The dates shown on consultation was pandemic year and Residents were not able to go or get proper consultation. The residents of Puhinui road have just found out what they received those two letters from the Auckland Transport.
5. This is taking place in a city that's barely recovering from a global pandemic, where households have been hit by all types of hardships: physical, financial, emotional, etc. We residents worked hard and build a house and a family home for the future. Suddenly someone just want to wipe out our livelihood and future of our children and grandchildren.
6. It is unfair process AT. I am sure that there will be other means and ways to deal with this project without putting further hardship and mental and emotional stress to the residents. There is other alternative such as Cavendish Drive which is commercial and less destructive to the residential occupant.
7. Both Cavendish Drive and Puhinui road can be utilized and save hundreds of vulnerable families homes and same money can be used elsewhere.
8. Some houses were built within last four years, but the council or AT never informed the homeowners that their properties will be impacted in future. Very poor planning and lack of care has been seen.
9. Puhinui Road has been constructed so many times. Poor planners at AT and it costs taxpayers and rate payers so much unnecessary spending. Hundreds of Pohutukawa were planted and then destroyed by the AT on recent construction. That money could have been used and spent elsewhere.
10. There are many family homes and new homes built for the families and grandchildren and even designed for home base businesses. ie: 154 Puhinui Road, 172 Puhinui road and many others. Having to relocate it will be detrimental to the families.
11. There is shortage of housing in Auckland particularly in South Auckland. Some residents have brand new homes and invest lots of money and they are devastated after hearing that their home will be taken away from them. If compensated how much, a compensation will not fix the emotional stress which will be a lifetime one.
12. The current roading and walkway is sufficient for the public. The buses on Puhinui road goes empty every 10 minutes. There are hardly any passengers in the bus. Why such a big investment

and waste of ratepayer's money. The money could be used for other more important things eg: Housing and health. More facilities and parking at public hospitals.

13. The people and (Ratepayers) of Auckland need more housing and healthcare care including many other more important necessities. After the pandemic cost of living has gone skyrocketing and government intervention is imperative and funding is required. Funding needed for public safety from the government. It seems AT has no idea that other places contribution and funding is required rather than only focusing in roading. For the size of south Auckland population right now we have road to cater the population. Puhinui road doesn't require widening and it is unfair to take away homes from the vulnerable.
14. The bridge at the airport need widening and that should be a priority. Currently commutes facing difficulty to enter airport which is only two-line bridge. The AT planners should focus on more important issues right which is the bridge and other part of Auckland like harbour bridge.
15. There are some residents who operates businesses from home and those will immensely be affected. Relocating will be very costly and will impact on customers and their business. Most of us are just recovering from the Pandemic and AT has some came up some crocket ideas just before the next election.
16. There is other better planning can be possible with affecting the residents. At present Puhinui road is wide enough and used for the bus lines on each side and plus the cars etc. The walkway is wide enough to be shared with bike lines. The other alternative is that AT can purchase half mitre on both sides to allow the bike line separately. Some owners were told recently that only a metre of their land will be bought, there is mix and inaccurate information form the AT. This will be less costly, and the residents' properties can be saved the money could be used for other more important projects.
17. Therefore, market rate is not a fair since the homeowners will lose lifetime and interest for their lifetime. Whereas others who retain home and not affected still assessed at market rate. It will only fair to consider double the market rate to enjoy and purchase another property elsewhere. The government should change the law immediately under public act to stop taking properties and those affected for relocation. We don't live in communist country and our land should not be taken away by force.
18. The AT has already did road improvements on Puhinui Road during 2021-2022. It must have cost the taxpayers and rate payers millions of dollars. The road for the purpose is perfectly fine. Why AT would like to demolish the road and to redo it again. It is bad planning by AT. It has been a nuisance for many years of unnecessary constructions on this road.
19. There are few new homes are on build and why Auckland council gave permit to build. The new homes will be affected and the cost mount up for the homeowners.
20. Government should stop revisit the legislation and not to force homeowners to leave their loved home. In stream case if it became necessary to leave than government should pay double of the market value. This in ease the pressure and hardship on the homeowners to relocate or build a home for their future.

21. My family purchased a land on 154 Puhinui Road, Papatoetoe about 25 years ago and built a new 3-bedroom house. We worked hard and bought up our kids and we never thought of moving out. Kids grown up and in 2017 we re-built and extended brand new house. We invested quality products inside and outside the house because this is our family home.
22. We planned to live and basically die in this house. We never knew or thought of moving out from this house. Our grandchildren's future to stay closer to school, shopping, and office to run my business and to serve community as a JP for the past 25 years.
23. It devastating for my family once we received letter from AT. We never been consulted or been seen by any AT member. We are having a sleepless night as we get up in the morning and think that we going to lose our best home. We don't have any other property and put everything and life interest in this home.
24. It is very hard to buy a comparable house with a separate office nearby. Also, it will be difficult to get loan from the bank and many other factors. The other factors such as housing market and shortage. We rebuilt our house in 2017 and if we have to build with same spec it will cost more since the price of material has gone up.
25. After talking to AT once few weeks ago, I was advised that they will start purchasing houses around 2026-2027. It was a shock to us and since then we are very upset and worried. There was no proper consultation and AT and the planners are at fault and deceived us for having a proper consultation.
26. Recently we heard that one property is already bought by AT. I have been told property at 1/199 Puhinui road has been purchased by AT. The project hasn't been gone ahead or approved yet, why and how AT could purchase this property. It is matter of interest that how matters are hidden under the carpet. Where taxpayers' money is spent unnecessary. The residents are kept in limbo and the matter is not transparent. The public works Act is too old and need immediate revision.
27. It is evident from the recent comments from the public after the Stuff NZ news on 20<sup>th</sup> October 2022, that this project and destroying over 400 homes will be waste of taxpayers' money. Light rail will be sufficient to replace bus line with a track.

[Hundreds of Auckland homeowners could lose land to busway project | Stuff.co.nz](#)

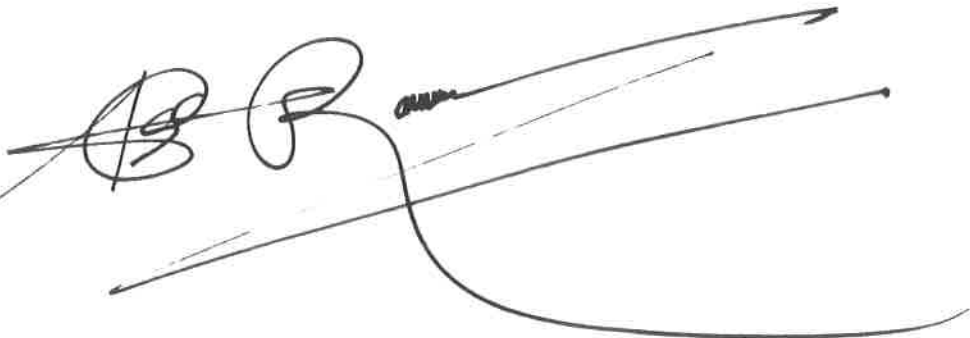
28. Puhinui road is heavily populated with residents and school. It will be unsafe to build a motorway on this street. Whereas Te Irirangi Drive- straight through Cavendish drive -via Clendon Road will be better choice while it is more of a commercial area. The residents don't want a motorway and through heavily populated residential area on Puhinui road, considering Puhinui primary school and childcare facilities on Puhinui road.
29. The residents on Puhinui road are protesting to the Government /Auckland Council, Auckland Transport and Waka Kotahi NZ to refrain from taking our properties and our life interest.

- 30. Since the Puhinui residents came to know that they may lose their homes, so they will not do any home improvement. This street will look ugly, and they will not be able to get a true value on their property. The government should look at changing the Public Works Act so that in this case people are properly compensated if their properties are affected.
- 31. Having a happy family and a nest (House) for the family is very important to any individual. It the most expensive asset that one can have in a lifetime. No one would like their nest to be taken away so easily. It is cruel and greedy that AT and government to any individual. AT can afford to buy our homes but we poor citizens can't afford to build or buy same house elsewhere. We are getting old. Please don't destroy our hard-earned asset and our precious temple. Cost of relocation will be daunting and very stressful and costly. This news and project driving people towards mental illness.
- 32. There are many public and homeowners support to stop this impact and stress on well settled residents. The government should intervene and find some other alternative to concur this serious issue. Just STOP these and take off the designation on the property titles on our properties. We all are in extreme stress and having a sleepless night and some owners getting emotionally stressed because there are no counselling services were provided. AT will be responsible for homeowners illness.
- 33. We request government and Ministers to intervene and stop this project going forward and use other alternative route such as Cavendish Drive that was initially planned. And do not run a motorway in the middle of heavily populated residential homes and schools.
- 34. **We have attached 33 signed objections – to stop taking our nest away and stop designation process or make any changes.**

Homeowner/ home business:

Kamlesh Rana JP  
Immigration Adviser  
Marriage Celebrant

154 Puhinui Road, Papatoetoe Papatoetoe

A large, stylized handwritten signature in black ink, appearing to be 'Kamlesh Rana', is written over the signature line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Ashok & Aneeta Krishna

Address: 85 Puhinui Road, Papatoetoe

Phone Number: 0211229969

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



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The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Name: JOHN SADD

Address: 196 PUHINUI ROAD

Phone Number: 0211272046

Signature: 

Come to  
visit

JOHNNY ISAAC 22 @gmail.com

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: KENENDRA SWAMY (JAMES)

Address: 2/179 PUHINUI ROAD, PAPATOETOE

Phone Number: 022 - 5263757

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: MAXINE DEER

Address: 1/148 Puhinui Road Papatoetoe

Phone Number: 021-02422149

Signature: 

Household of 4 kids 14, 10, 9, 5  
And myself.

Please fill the above form, sign this petition and either drop off in my letter box

At:

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Suphraj Rana

Address: 93 a Puhinui Road Papatoetoe

Phone Number: 022 530 586

Signature: [Handwritten Signature]

Please fill the above form, sign this petition and either drop off in my letter box

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Name: CHRIS HANS

Address: 2/187 PUHINUI RD

Phone Number: 021 566 783

Signature: 

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Name: PHUONG

Address: 136 Puhinui Rd

Phone Number: 021 252 1832

Signature: 

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: ABDUL SHARIF

Address: 205 PUHINUI RD

Phone Number: 0210587614

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: CHANDRA LATA SINGH

Address: 190A PUHINUI ROAD, PAPATOETOE

Phone Number: 02102489389

Signature: CRK

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Name: UDAY SINGH

Address: 190A PUHINUI ROAD, PAPATOETOE

Phone Number: 0211219151

Signature: 

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At:

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Papatoetoe

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Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Aaron Chand

Address: 124 Puhinui road

Phone Number: 0271609813

Signature: Aaron

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

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Papatoetoe**

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**Name:** Avilash Chand

**Address:** 124 Puhinui Road

**Phone Number:** 0210513710

**Signature:** 

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Name: REGNA RANI / MANI

Address: 1/103 PUHINUI RD, PAPATOETOE

Phone Number: 0272295022 / 0277103007.

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

A note from a homeowner on Puhinui Road:

It was great meeting you in person to discuss the impact on the properties which are located on Puhinui Road. We are also residents which are being impacted by the future development. We have been living here since 2009 and it's truly shocking and unfortunate that we may lose our property which we have worked so hard to attain. This home has been our treasure and it hurts to be forced to give it.

I am wondering if the project is planned in the next 30 years, in which case I wonder why we are affected 25-30 years before it takes place. A similar situation happened to residents on Redoubt Road. I have heard that a few properties have been claimed 4-5 years back and there has still been no development. This resulted in the properties being rented now.

We do not want to face a similar situation. Why would we sell our properties at current market rates now when the property values are declining? Hypothetically, after 20-30 years from now, property values may increase, and development may still not have occurred. Resulting in our loss of our property for nothing and a loss. We are the ones being impacted by this heavily.

It does not make sense to be selling the property at current market rates as in the future the properties may be further developed. This would take away from possible investment opportunities for the homeowners and their future which relies on their property. We have future plans to develop our property for our children and grandchildren which is now at risk.

Relocation at current times is extremely difficult as the homes are extremely close to necessities daily. As most properties in Auckland are extremely expensive it would be near impossible to find a property at a similar calibre as the ones we own.

Regards,

Reena and Manjinder

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

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Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Sandeep Kumar and Geeta Bhardwaj

Address: 3/89 Puhinui Road, Papatoetoe

Phone Number: 0211281831

Signature: Geeta / [Signature]

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Name: Rawandeep Kaur

Address: 186A Puhinui Road Papatoetoe

Phone Number: 0224329794

Signature: R. Kaur

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Manginder Singh Birn

**Address:** 186 Puhinui Road, Papatoetoe

**Phone Number:** 0212146922

**Signature:** Manginder Singh Birn

Please fill the above form, sign this petition and either drop off in my letter box

At:

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

**Name:** Champat Patel

**Address:** 165 Puhinui Rd. Papatoetoe

**Phone Number:** 021 022 60547

**Signature:** 

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At:

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Name: NIRAJ BHUTANI + ABHA WALIA

Address: 119 Puhinui Rd, Papatoetoe

Phone Number: 0211005791, 021 0296 7474

Signature: Niraj Bhutani Abha Walia

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Mohammed & Sazia Khalil

Address: 264 & 264a Puhinui Rd. Papatoetoe

Phone Number: 02102738836

Signature: 

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At:

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Papatoetoe

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Kia Ora *Dairy shop owner.*

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: *Bhavesh Patel*

Address: *284 Puhinui rd*

Phone Number: *0211571719*

Signature: *B. Patel*

Please fill the above form, sign this petition and either drop off in my letter box

At:

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Papatoetoe

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I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: MARIE STUCKMAN

Address: 154 WYLLIE ROAD

Phone Number: 02107 83342

Signature: MBL

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At:

154 Puhinui Road  
Papatoetoe

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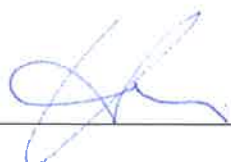
Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Amy Bui

Address: 219 Puhinui Road, Papatoetoe

Phone Number: 021 030 6983

Signature: 

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Transport and Waka Kotahi NZ for any impact on our property now or in any future  
projects.

*and the NZ Government*

**Name:** JOHN HANSFORD

**Address:** 138 PUHINUI RD, PAPATOETOE

**Phone Number:** 09-2780386

**Signature:** 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

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Name: J GOULD

Address: 306 PUHINUI RD

Phone Number: 0272903306

Signature: 

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At:

154 Puhinui Road  
Papatoetoe

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Name: BAL KRISHNA

Address: 2/199 PUHINUI ROAD - PAPATOETOE

Phone Number: 021964090

Signature: 

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At:

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**Name:** LES + CAROLINE TANA-TEPANIA

**Address:** 132 Puhinui RD

**Phone Number:** 021 792 025

**Signature:** 

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Name: GIANG THI LAM TRAN & TRUONG CONG NGUYEN

Address: 200 PUHINUI RD - PAPATOETOE.

Phone Number: 02108225414.

Signature: 

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Name: Polly Ngakhe Walker

Address: 193 Puhinui Rd

Phone Number: 0275147866

Signature: 

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Name: LOKESH GERA

Address: 104A, PUHINUI ROAD, PAPATOETOE, AUCKLAND

Phone Number: 020415 77753

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Sharon Howell

Address: 2/193 Puhinui Rd

Phone Number: 0212573460

Signature: S. Howell

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

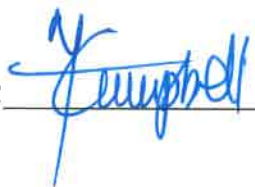
Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Fa'ana Campbell

Address: 148A Puhinui Road, Papatoetoe

Phone Number: 022 1990 187

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262



Please Act now before it's too late:

The Homeowner/s  
On Puhinui Road  
Papatoetoe

**OBJECTION – TO STOP IMPACT ON PROPERTIES ON PUHINUI ROAD FROM AIRPORT TO BOTANY RAPID TRANSIT PROJECT.**

Kia Ora

I am a resident and homeowner on Puhinui road, Papatoetoe and I will object Auckland Transport and Waka Kotahi NZ for any impact on our property now or in any future projects.

Name: Khan Magbool

Address: 2 Ranfurly Rd Papatoetoe.

Phone Number: 022 032 8440

Signature: 

Please fill the above form, sign this petition and either drop off in my letter box

At:

154 Puhinui Road  
Papatoetoe

Or phone to pick: 0275267262

**From:** [NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:NoticeOfRequirementOnlineSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** [ID:446] Notice of Requirement online submission - maya krishna goundar  
**Date:** Monday, 10 April 2023 6:00:40 pm

---

The following customer has submitted a Notice of Requirement online submission.

#### **Contact details**

Full name of submitter: maya krishna goundar

Organisation name:

Full name of your agent:

Email address: skautomotive@rocketmail.com

Contact phone number: 021486768

Postal address:  
104 puhinui road  
papatoetoe  
auckland 2104

#### **Submission details**

Name of requiring authority: Waka Kotahi NZ Transport Agency

The designation or alteration: Notice of Requirement: Alteration to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport (Waka Kotahi NZ Transport Agency)

The specific provisions that my submission relates to are:

Do you support or oppose the Notice of Requirement? I or we oppose the Notice of Requirement.

The reason for my or our views are:  
-it will affect our place of living.

I or we seek the following recommendation or decision from Auckland Council:  
-exactly how will our address be affected.

Submission date: 10 April 2023

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

I accept and agree that:

- by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public,
- I or we must serve a copy of the submission on the person who gave the notice of requirement as soon as reasonably practicable after submitting to Auckland Council.

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

This is a submission on a notice of requirement:

By: Name of Requiring Authority	Waka Kotahi NZ Transport Agency
For: A new designation or alteration to an existing designation	Alteration to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport

The specific parts of the above notice of requirement that my submission relates to are: *(give details)*:

My submission is:

- I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
 I or we are neutral to the Notice of Requirement

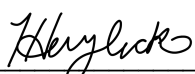
The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

Blank lines for providing details of the recommendation or decision sought.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
 \_\_\_\_\_  
 Signature of Submitter  
 (or person authorised to sign on behalf of submitter)

\_\_\_\_\_  
 Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

## Construction Effects

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs for construction of BRT project. Some of the construction effects (e.g., noise, dust and vibration) will be significant. Not all mitigation measures mentioned in the documentation are sufficient.

### Reasons for Submission:

The NoR documentation notes that once detailed design has occurred, the construction phases of the project will vary between 3-6 years.

Some of the construction effects (e.g., noise, dust and vibration) will be significant. Three to six years is a *long* time. Some of the effects of road construction and maintenance along Puhinui Road (e.g., the Watercare Hunua water main, the construction of existing bus lanes) resulted in significant disruption. It became unpleasant to live in the area. But we always knew the time period would be relatively short. In neither case did it take *years*.

The Assessment of Environmental Effects (p.93) notes the noise of construction will be temporary. But temporary does not mean short.

Some of the noise effects are *significant*. Loud noise, significant vibration, etc.

There seem to be some mitigation measures in place, particularly for sensitive activities. There is the opportunity for short-term respite and relocation in certain circumstances. Reading the conditions for such relocation, suggests to me that it is going to be quite a difficult process to prove the need for such measures. Once again, our community is neither a highly literate nor litigious one. There are social, educational and economic barriers to effective involvement and self-advocacy.

I would like to see AT providing one-on-one assistance for applying for such mitigation measures (similar to the Friends of the Submitter programme, but locally based).

I would also like to see AT providing other support – for example, if a family needs to temporarily relocate due to the effects of construction, they should not be materially disadvantaged by things like the cost of taking their children to school from where they are staying outside the affected area.

Another example of AT providing other support could be temporary relocation to vacant office space where people work from home and their work days are disrupted by the effects of noise and vibration.

I would also appreciate AT, at the design stage of the project, carefully re-assessing the potential effects of noise, vibration, etc., and monitoring them during construction. I would

like to see more effort put into looking at alternatives to mitigate the effects, such as technology advances, rather than just looking at means such as limiting the operational time windows when active construction is taking place.

Once again, this is a high-needs community that is not used to interacting with big, powerful organisations such as AC and AT. I reflect on how differently a community such as Remuera might respond to such a transport proposal, with significant construction effects on properties for up to six years.

Our community is strong, but it is not immune to the effects of stress. I would hate to see issues such as domestic violence, anxiety and depression rates increasing in an already vulnerable area as a result of a transport project which will give that community negligible positive benefits in the future. Indeed, it is likely to be left with ongoing negative impacts (e.g., noise, dust, visual) even once the BRT is operational.

#### **Seek recommendations:**

- I would like to see AT providing one-on-one assistance for applying for mitigation measures such as relocation opportunities (similar to the Friends of the Submitter programme, but locally based).
- I would also like to see AT providing other, associated financial support – for example, if a family needs to temporarily relocate due to the effects of construction, they should not be materially disadvantaged by things like the cost of taking their children to school from where they are staying outside the affected area.
- I would like AT to provide support to those residents who work from home and are impacted by construction noise (e.g., temporary hire of vacant office spaces away from the affected area).
- I would also appreciate AT, at the design stage of the project, carefully re-assessing the potential effects of noise, vibration, etc., and monitoring them during construction. I would like to see more effort put into looking at other alternatives to mitigate the effects, such as technology advances, rather than just looking at means such as limiting the operational time windows when active construction is taking place.

## Effects on local roading network

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on local roads near the BRT route

### Reasons for Submission:

#### Traffic on streets surrounding the BRT route

The documentation for the BRT notes that there will be traffic impacts on surrounding streets that are in close proximity to Puhinui Road and other roadways along the length of the BRT. People will attempt to avoid the congestion caused by construction of the BRT on the main route, by driving in surrounding streets. The residents of these streets will not be accustomed to these volumes of traffic. AT needs to consider how to best manage this through road management practices on those roads, and mitigation of vehicle noise for residents of these streets.

In addition, as residents along the BRT will now only be able to turn left out of their driveways, they will have to drive on these surrounding streets to get to their destinations. The NoR documentation notes in a number of places, that having to turn left out of a driveway and go around the block to get to a destination will add approximately 2.5km to each journey. Assuming people would then return to their homes afterwards, this would add approximately 5km to each trip away from home. When considering this, and adding it all up, an effect of this aspect of the BRT proposal will be more vehicle kilometres travelled and, therefore, more pollution emitted from vehicles. It will also cost residents more over time in fuel and vehicle maintenance.

In order to mitigate these effects, AT should look at compensating for the extra cost to residents with financial compensation. It should also look at how it can mitigate the effect of the increased pollution that will be caused – for example, by using the left-over land that is acquired for the designation, as a ribbon park with plentiful tree planting to offset the increased emission of greenhouse gases caused as a result of the need for people to add 5km of vehicle use per return journey from their homes.

#### Noel Burnside Ave

I note that the current entrance to SH20 at the intersection of Puhinui Road and the state highway will be closed. The NoR documentation notes this will put added traffic onto Noel Burnside Ave. This is already an extremely busy street. The recent changes to the configuration of lanes in the vicinity of the Noel Burnside/Puhinui/Wyllie Road intersections have led to significant traffic delays as vehicles navigate a short length of Puhinui Road to get from Noel Burnside to Wyllie and vice-versa. This will only be exacerbated with Noel Burnside Ave becoming busier as the main way for cars to get to SH20 from the surrounding area.

This aspect of the roading design needs some detailed consideration and a re-look at the potential impacts and practicality of putting Noel Burnside Ave in this position as a major through-link.

#### Pedestrian linkages across BRT

Various maps in the NoR documentation show arrows where it is expected that there will be pedestrian access across the BRT (e.g., near Puhinui School, and the Puhinui Road shops at the end of Ranfurly Road). In the Assessment of Traffic Effects (p.91) 'cross walks' are mentioned. Elsewhere in the NoR documents, 'at grade' crossings are mentioned (i.e., underpasses or bridges).

I imagine that cross-walks will not help to achieve the rapid transit of buses if signalised pedestrian crossings are put in place. Underpasses are probably not ideal (both in terms of safety and the fact that Puhinui Road has a number of major services tunneled underground along its length, such as gas and water). Bridges for pedestrians will require the acquisition of more land than has been shown in the documentation. For example, near the Puhinui Road shops, if a pedestrian bridge is built at the location shown on the map, it would necessitate the removal of some of the shops to allow for a ramp or stairs to access such a bridge.

In the detailed design phase of the project, AT should work with the community to identify the best ways and locations to provide pedestrian linkages across the BRT route.

#### **Seek recommendations:**

- That AT put appropriate traffic management practices in place in surrounding streets to avoid them becoming 'rat races' due to construction of the BRT, and consider how best to mitigate the effects of increased traffic noise on residents of these streets
- That AT provide compensation to land-owners who will only be able to turn left out of their driveways along Puhinui Road as a result of the BRT route.
- That AT mitigate the effect of increased vehicle use by residents who have to drive around the block to overcome the fact they can only turn left out of their driveways, by planting trees. Ideally in a ribbon park created using left-over land acquired but not used for the purpose of the designation.
- That AT further consider and report back on the ongoing operational role of Noel Burnside Ave once the link from Puhinui Road to SH20 is removed.
- That AT assess and report in more detail on the proposed linkages for pedestrians across the BRT



## Engagement

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Engagement with affected land owners in the lead-up to the lodgment of the NoRs has been poor.

Notification about the NoRs to affected and impacted land owners has been poor.

Communication during detailed design and construction phases needs to be done better than engagement carried out with residents to date.

### Reasons for Submission:

I realise that AT as the requiring authority didn't have to engage with the affected community prior to lodging the NoRs (S.36A RMA) but it is generally seen as good practice to do so. In my own experience as a planner at Auckland City Council (admittedly over twenty years ago now), it certainly makes it easier in the long run if you can bring a community along with you when planning a major planning or infrastructure project.

In the case of the Airport to Botany Rapid Transit project, AT and SG have made some attempts to engage. There are two weighty documents that outline their community engagement efforts (see Appendix A to this submission). However, when you dig down into the depths of these documents, to see what *actual* efforts were made to engage with the people likely to be *directly affected* by the route, the efforts were not satisfactory in my view.

I also realise that the engagement efforts of AT and SG will not 'make or break' the decision of whether the designations are approved. However, I'd like to think that what I say in this submission will be taken into account. It will definitely have had a major impact on the number of submissions received, and the understanding people have about the actual potential impacts of the project if constructed.

#### Engagement prior to lodging NoRs

Appendix A to this submission is my presentation to the Ōtara-Papatoetoe Local Board Meeting on 6 December 2022. It specifies the prior engagement that was carried out that specifically targetted people who might be directly impacted by the BRT designation.

Essentially, it boils down to:

- Unaddressed flyers dropped in letterboxes, delivered folded up in a bunch by the same people who drop off the unsolicited 'junk mail'
- Opportunities to talk to AT/SG staff at Manukau Westfield on two occasions and outside Papatoetoe New World on one occasion

- Letters addressed to residents in July 2022 which did not specify the scale or potential impact of the proposed route
- Letters to residents who are directly impacted by land acquisition either in whole or in part in August 2022 with an invitation to meet with SG staff
- Meetings with SG staff where owners of individual properties were told more about the potential impact on their land. For many, this was the first time they realised the extent of the impact to them personally. SG staff made it clear they could not give a map showing the entire route due to privacy reasons and that they could only talk to landowners about their own individual properties.

When we study the information sent to residents in the flyers, and even the information presented to local boards, the route shown was a generalised blue line along Puhinui Road, with absolutely no indication of the scale, including the plan to build a bridge to link with the Puhinui Train Station, and to realign the route to go through all the houses on the southern side of Puhinui Road from Clendon Ave on past Plunket. There was also no reference with the location of the blue line, to the impact on Kenderdine Road, Bridge Street and Cambridge Terrace. In addition, the only real route 'options' that people were asked to comment on in these flyers involved which streets within Manukau Central would have the BRT route. There were no clear opportunities that I can find information on where potentially impacted people were targeted to be invited to have *meaningful* input to which other routes (e.g., not using Puhinui Road at all) were being assessed.

We are also concerned that as the flyers were delivered, not in envelopes, and not individually addressed, they may well have gone un-noticed folded up in the 'junk mail' many of us put straight in the recycling bin.

When we drilled down into the type of consultation that occurred at the New World and Westfield Manukau information sessions, people were asked generalised questions designed to get standardised answers. They were offered the opportunity to write short comments and place them on maps with post-it notes. The route 'options' presented were few.

When we tried to get further information from SG staff about the other properties affected by the proposed route, we were continually rebuffed, with privacy issues cited. My husband and I went door-knocking up and down the street, trying not to look like we were selling vacuum cleaners, to see talk to other residents about the impact on their properties. We were floored to find that some people had not even received a letter, and thus were completely unaware of the project. (Including a property badly affected by the 2021 tornado – the old house was demolished and there is currently a brand-new two-storey home being built on the site at 182 Puhinui Road – you can imagine the shock and consternation of the land owner who was given consent to build on a property about to be affected by an acquisition under an NoR!)

It was not until late in the piece, after repeated requests from Arena Williams, our local MP, that AT/SG staff came to a meeting outside the Puhinui Train Station and unrolled a map so people could see the actual extent of the proposed NoR.

Digging into the engagement documents from AT/SG, I was surprised to see that residents associations in far-flung areas such as Wattle Downs, had been engaged with, but not the people likely to be directly affected by construction of the BRT route.

The SIA Appendix B, Summary of Engagement, mentions that there were interviews undertaken with stakeholders including private property owners. The document only notes conversations with one business owner from the shops adjacent to Ranfurly Road, and the opinion piece written for and published in the *NZ Herald* by Mr Ali Shakir who lives at the Botany end of the BRT corridor. The first section of the Summary notes that, "*Not all stakeholders were able to participate in the SIA or were able to complete the Social Impact Assessment Process.*" I would like to know how the particular stakeholders and groups were identified, and why, for the entirety of the route from the airport to Botany, only two 'private property owners' were interviewed.

The Summary goes on to say that "*We identified advocacy groups, social enterprises, and other groups representing community interests and business and community networks and contacted them.*" I would like to know if any were in the area most affected by property acquisition. The voluntary surveys carried out, and the meetings with groups noted in the Summary show *no* groups directly linked to the area most affected by property acquisition. The groups noted in the Summary were:

- *Chinese community in Botany Downs, Botany Junction, Flat Bush, Dannemora and Ormiston with a focus on older people and youth;*
- *The Fijian Indian community in Flat Bush, Ormiston, Clover Park and the Airport Precinct;*
- *The Pasifika community in Otara, Clover Park, Wiri, Flat Bush, Manukau City Centre and Ormiston, age groups 18-49; and*
- *Residents in the Flat Bush and Ormiston area.*

None of these groups are located or representative of people living in Papatōetoe, particularly Puhinui Road, or in the vicinity of land to be taken around Bridge Street. This does not seem like an SIA that was carried out with the intention of actually getting honest input from affected landowners.

Social Impact Assessment engagement interviews were carried out with the Puhinui Medical Centre and Puhinui School. These interviews were focussed very much on the impact of the project on business and access. Neither the school nor the medical centre are facing property acquisition. In addition, it is unclear *when* these conversations took place, and whether the true impact of expected housing intensification has been taken into account in discussions on, for example, expected roll growth in the future. In addition, were those at the school made fully aware of the extent of the BRT route and its infrastructure and the fact it will, essentially cut the school off geographically from most of its school community?

Near the end of the Summary of Engagement is a table (Table 2) which notes that approximately 85 of the 475 potentially affected landowners were met with. I would like to know how the 85 were contacted and met with. The only thing I can think of is that it is these land owners who responded to their letters of August 2022 inviting them to meet with

representatives of SG. These meetings were not true 'engagement' or part of a Social Impact Assessment – they were merely to inform land owners of what could be happening to their land, and of the designation process itself.

I am incensed at the low level of effective communication with land owners likely to be directly affected by the proposal. I try not to be squinty-eyed and cynical, but I'm sure a proposal as large as this would have been treated quite differently if it were to be planned in a more wealthy, educated area where people are more inclined to litigate.

That said, I once worked as a planner at Auckland City Council. If anyone here should have seen the extent of the proposal coming, it should have been me. But I didn't see it coming. The blue line on the flyers I took to mean some improvements to the bus lane that is already outside our house. Perhaps widening a metre or so to give a bit more space on the carriage way.

When we bought 172 Puhinui Road over 25 years ago, it had a road widening designation on it for a metre or so from the front of the property. This designation was lifted after the full construction of the Cavendish Drive through-route which was where most traffic, including freight vehicles, was expected to travel, leaving Puhinui Road more for local traffic. Since then, bus lanes have been created down Puhinui Road. They are a bit tight so you can imagine, then, when we saw the flyers with the blue line drawn on them, that we thought AT was re-considering minor road-widening such as was proposed when we first bought here, in order to give the bus lanes a little more space.

Even when we received our letter in August 2022 and made an appointment time to talk to SG representatives, I naively went along thinking, even though our whole property was cross-hatched on the map attached to the letter, that only a small sliver was likely to be needed to facilitate improved rapid bus transit via a widening of the bus lane. How wrong I was, and how shocked was I when, at the meeting, after sitting through the planners telling us about the need for improved public transport in the area, they said it was our *entire* property to be taken for the BRT route, and that there would be an enormous raised bridge going through where our house currently sits.

Going back to dissect those flyers, I still don't think even knowing what I know now, that the information that was contained in them gave a true and accurate reflection of the potential *scale* of the proposed BRT. The cynical part of me looks at the documentation and wonders if this was intentional all along.

I feel that I have failed my local community by not seeing this coming.

Page37 of the SIA notes that a reason for people in the area having poor knowledge of the project, is that as it has taken a long time to get to the notification of designations, many people have moved out of the area, and the newcomers don't know about the project. This may be the case, but I would also argue that most long-term residents have not known about the project either.



### Notification of NoRs

Now that we are at the stage of the NoRs being lodged and publically notified as open for submission, AT/AC have sent letters to directly affected land owners (those with properties to be acquired in full or in part if the designations go through).

Given that there are many others (especially in properties that adjoin those to be acquired, or on the other side of Puhinui Road from the properties to be acquired) who will also be massively impacted by the construction and operation of the BRT, I would like to know why these property owners did not also receive letters to notify them that submissions are open.

As mentioned in the SIA, this is a disadvantaged community with a high deprivation level. The formal method of notifying about the NoRs is not one that will readily see people who live here, getting involved and making submissions. Many are elderly. Many have English as a second language. Some have come from other countries as refugees. Some cannot read or write, certainly not to the level required to understand the NoR documents and respond to them. Many families here live pay-cheque to pay-cheque or rely on assistance from food banks to feed their kids. These people will not necessarily have access to the internet, devices, or printing. People who live here are not generally litigious.

I believe strongly that in areas such as this, there needs to be a better method of getting people involved in the process. Face-to-face meetings are needed, with more assistance than can be provided via Friends of the Submitter whose planning offices are based far away on the North Shore (many here I have spoken to are frightened to talk to the FoS as they see they are employed via AC and, therefore, may not be unbiased). I am unsure why a more locally based planning company was not used to provide FoS services to this community – where they could actually come out on the ground and meet with people who are not comfortable communicating via the phone, internet or the written word.

The statutory timeframe does not give people who are working full time much time to read, absorb and submit for a project of this scale, either.

I would not be at all surprised, if the designations go through and, eventually, construction begins, for some of our neighbourhood to be like Arthur Dent in *The Hitchhiker's Guide to the Galaxy* by Douglas Adams. Arthur came out of his house one morning in his dressing gown, to find the bulldozers ready to demolish his house (actually, the whole planet) to make way for a new hyperspace bypass. When he asked about what consultation had gone on for the project, he found that the documents had been available for viewing on another planet.

*"You hadn't exactly gone out of your way to call attention to them had you? I mean like actually telling anyone or anything."*

*"But the plans were on display . . ."*

*"On display? I eventually had to go down to the cellar to find them."*

*"That's the display department."*

*"With a flashlight."*

*"Ah, well, the lights had probably gone."*

*"So had the stairs."*

*"But look, you found the notice, didn't you?"*

*"Yes," said Arthur, "yes I did. It was on display in the bottom of a locked filing cabinet stuck in a disused lavatory with a sign on the door saying, 'Beware of the Leopard'."*

Please, Auckland Transport, Supporting Growth and Auckland Council, let's do better.

### Detailed Design and Construction Phases

The SIA outlines how, *"Ongoing engagement should continue during the planning stage of the Project to continue to maintain and build relationships with the community and provide an opportunity for those new to the area to find out about the project."* Given what I have written above, I don't think there are existing relationships to build on.

Indeed, page 52 of the SIA recommends that a Community and Stakeholder Engagement Strategy be developed for the project that includes, among other things, *"Maintaining the current good relationships between Auckland Transport and Waka Kotahi and the community, particularly directly affected landowners."* This is almost laughable given the poor engagement efforts that have been undertaken to date, despite the two impressive-looking engagement documents. I would challenge AT to find even one affected land owner who truly feels they have been effectively engaged with to date that the organization could say they have a 'current good relationship' with.

The SIA (p.52) suggests information about the project be available for the community, and in particular, affected land owners. The SIA suggests this be done via the AT website. For all the reasons noted above, such as low literacy, ESOL, etc., this is not going to be enough. There will need to be face-to-face meetings and get-togethers.

Please treat our community better than has been done to date with this project.

### **Seek recommendations:**

- That AT/AC communicate much more effectively with affected communities if the project goes ahead.
- That there be a more effective, locally-based 'Friends of the Submitter' type offer to assist people in the neighbourhood with the rest of the designation process (hearings, etc.)

- That not only land owners of properties to be acquired are communicated with, but other affected people too, such as those with properties adjacent to acquired properties
- That there be a dedicated team to work alongside the affected residents during detailed design and construction phases (face to face meetings, etc., not just information on a website).



**Appendix A to submission by Heather Haylock regarding  
Engagement for  
NoRs 1, 2, 3, 4a and 4b**

**Presentation to Ōtara-Papatoetoe Local Board Meeting**

**6 December 2022**

**Regarding Airport to Botany Rapid Transit Route**

## **Presentation to Ōtara-Papatoetoe Local Board Meeting**

**6 December 2022**

### **Regarding Airport to Botany Rapid Transit Route**

**by Heather Haylock**

I am speaking as one of a number of people who live and work along Puhinui Road, as well as others in Bridge Street, Kenderdine Road and Cambridge Terrace and people in the surrounding area, who are to be massively impacted by the proposed Airport to Botany Rapid Transit Route. Mr Kamlesh Rana will also be speaking at the meeting.

#### **Letters**

In July and August 2022, residents of affected properties received letters from Te Tupu Ngātahi Supporting Growth Group/Auckland Transport, advising that the preferred route for the Airport to Botany Rapid Transit Project would impact their properties. The August letter invited individual land owners to make an appointment for an interview with representatives from Supporting Growth. The letter also included site maps for individual properties to show the land expected to be required for the project.

#### **Meetings**

At the meetings, landowners for separate properties were ushered into rooms with two representatives from Supporting Growth/AT. This meant that no landowners met with other landowners, and different pairs of representatives spoke to different landowners.

After being told more about the overall rapid transit project and how it fits into overall plans for public transport in Auckland, landowners were able to discuss the impact on their individual properties.

Many of us were shocked at the extent of the land required. In some cases, it is our whole properties. In others, there are significant slices of land taken from the fronts of properties – in some cases, this would mean the transport routes are within a metre or two of existing front doors.

We were shocked at the extent of the proposed project. In none of the community 'consultation' (see 'Background Consultation' section below) had this been made clear. We had been lulled into a false sense of security, and led to think that the impact on this section of Puhinui Road might be limited to some extension of the existing bus lanes.

The Supporting Growth/AT reps explained the designation process. The plan is for a requirement for designation to be applied for by AT in December 2022, with an opportunity

for people to make submissions and appear at Auckland Council hearings in 2023. If the designation is approved by Council, it will go onto the District Plan maps.

The representatives said there are no plans to purchase properties under the Public Works Act until the project is closer to construction. Different residents were told different things by the various representatives. Some were told properties might be able to be bought in five years time, but most were told that as the project is some 10-15 years away, it would be unlikely that an offer would be made for properties for at least ten years.

Different landowners were also given mixed messages about what the purchase of their properties would mean – what 'market rates' paid for the properties actually means in practice. Many landowners do not want to sell, and have concerns about the fact that their land may be taken anyway, whether or not they wish to sell to AT.

When asked for a map of the route to show the true extent of the project, and the route, and the actual properties affected, the representatives told us that was not possible as it would be a breach of privacy – that they could only talk to individuals about their own properties. This seemed disingenuous; as a result, we have gone door-knocking and made announcements in social media to try to get in contact with as many affected people as we can so we can put together our own map of the route.

When we went door-knocking, it came to light that some residents did not even receive their letters, so had no idea about what was going on. In one case, a resident is currently building a new home in place of the one that was destroyed in last year's tornado. It seems almost unbelievable that consent was given for that building to go ahead in the knowledge that in 10-15 years it will be demolished to make way for the rapid transit route.

## **The proposal**

Despite generalised maps sent out over the past couple of years (see 'Background Consultation' below), at no point was the true scale of the project made clear. It appears that the route comes from the airport, along Puhinui Road, and is then bridged up over the top of the train tracks to link with the top floor of the new Puhinui Train Station. The bridge continues on down past Plunket Ave before the route returns to ground level (apparently a long approach is required on either side of the bridge to get the gradient needed for rapid transit vehicles). Because of the placement of the Puhinui Station, slightly to the south of Puhinui Road, the bridge will go directly through all the properties affected. Scale of the bridge can be seen on the following video: <https://youtu.be/iSeQIR7gzZM>

Not only will it impact the landowners of those properties that will be taken, but it will also impact those neighbours abutting the bridge (e.g., in Freyburg Avenue), leaving them with a bridge at the bottom of their backyards. These people have not been consulted with at all.

There is planned to be another station at the intersection of Puhinui Road and Lambie Drive, before the route travels along Lambie to get to the Manukau Train Station. After that it winds its way back towards Te Irirangi Drive where it continues to Botany Town Centre.

In addition, the plan is to widen the sections of Kenderdine, Bridge Street and Cambridge Terrace to allow better traffic flow for local traffic and buses, and walking and cycling. Nowhere in the background consultation maps was this suggested at all, so the project has come as a massive blow from left-field for those land owners.

### **Background 'consultation'**

After the interview meeting with the Supporting Growth/AT representatives, we spent some time trying to work out how such a massive project had got to this stage of development without us knowing.

We found reference to two documents which outline the community participation programme. *Southwest Gateway Programme Engagement Summary December 2017 to December 2018*, and *Southwest Gateway Programme Engagement Summary January to December 2019*. ([see end of this report for location of downloadable documents](#))

In summary, it appears that residents along the route will have received some flyers in the mail over the past few years, and had the opportunity to go and look at some posters in places such as Papatoetoe New World one evening, and Westfield Manukau on two dates.

There were presentations made to a number of local boards, including the Ōtara-Papatoetoe Local Board on 17 September 2018. (Airport-Botany 20 Connect Southern Local Boards presentation) ([see end of this report for location of downloadable document](#))

When we study the information sent to residents in the flyers, and even the information presented to local boards, the route was a generalised blue line along Puhinui Road, with absolutely no indication of the scale, including the plan to build a bridge to link with the Puhinui Train Station, and to realign the route to go through all the houses on the southern side of Puhinui Road from Clendon Ave on past Plunket. There was also no reference to the impact on Kenderdine Road, Bridge Street and Cambridge Terrace.

We are also concerned that as the flyers were delivered, not in envelopes, and not individually addressed, they may well have gone un-noticed in the 'junk mail' many of us put straight in the recycling bin.

When we dug down into the type of consultation that occurred at the New World and Westfield Manukau information sessions, people were asked generalised questions designed to get standardised answers. They were offered the opportunity to write short comments and place them on maps with post-it notes.

The two Engagement Summary documents are very thick and impressive-looking, but when you actually read them, there is a lot of repetition. Much fluff and not much substance. We were fascinated to read that groups such as residents groups in Wattle Downs, Weymouth and Alfirston (to name a few) were consulted with – while in the meantime, people whose actual properties would be taken by the project were not directly contacted at all.

In a shortened summary of the community engagement feedback that appeared in the letterbox, it states: *"We asked people what they thought of the preferred rapid transit route between the airport, Puhinui Station Interchange, Manukau and Botany. Of the 62 responses, 83% of people were in support of the preferred route."* This is misleading. The only 'options' referred to here were whether the route through Manukau City itself would go via the Manukau Train Station, or leave the station out and go along the adjacent road instead.

We consider that with a project of this extreme magnitude, more should have been done in the planning stages to involve the local community and landowners directly affected.

It feels to us as though the project has been pushed through underground, in a way whether intentional or not) that has misinformed those directly affected until the last possible moment when the designation was about to be applied for. This does not seem fair, equitable or democratic.

We are concerned that many people in our area will not have been able to access the information. There are many here for whom English is a second language. And many busy living from pay cheque to pay cheque to survive in these difficult pandemic times. These people will not have had an equal chance to participate in this process.

As our representatives to Council, we ask that the Ōtara-Papatoetoe Local Board supports the affected residents throughout the coming process.

### **Attempts to get further information**

At our individual meeting with the Supporting Growth/AT representatives, we asked about the business case that has been put together and, specifically, what other options were investigated. One we suggested was that rather than going through the residential area, why not take the rapid transit directly from the Puhinui Station to the Manukau Station along the corridor already developed for that purpose. We did not get a satisfactory answer to our question.

The representatives there seemed focussed on telling us about the designation process, and what would happen when our land is required.

We emailed Supporting Growth, asking for further information, but were told, once again, no further information could be provided to us about the actual route, citing privacy concerns for other land owners.

### **Local MP, Media**

Some of us have appeared in the *NZ Herald* and *Stuff* talking about the concerns. There are others further along the route near Botany Town Centre who have done the same.

We have also approached Arena Williams, our local Member of Parliament. She has been extremely helpful in trying to get further information from Auckland Transport. She has held a meeting for residents (some Local Board members also attended) and there is another meeting planned for Wednesday 30 November, where AT representatives will be in attendance.

### **Main concerns**

To summarise, some of the main concerns we have are:

#### Uncertainty

This project puts landowners in an untenable situation. They are in limbo. Some planned to stay in their homes until their deaths. Others planned to sell in the next few years.

Having a designation (or even a proposed designation) on a property means it will be difficult to sell. And until AT applies for and gets central government funding, it is our understanding they will not be looking to buy properties for the foreseeable future.

This uncertainty is putting people under incredible amounts of stress. We have heard reports of people being extremely upset, to the point of depression and anxiety attacks.

#### Property Value and liveability

Having a designation on a property affects its value. For those whose whole properties are planned to be taken in their entirety, it affects how much those properties can reach.

For those whose properties have a sizeable chunk taken away from the front of them, they will be left with a roadway very close to their front doors. This will impact their quality of life. In addition, in some cases, it will leave them with a tiny property footprint that will be incredibly hard to either develop or sell.

Another concern is that given the uncertainty, people may neglect to develop and maintain their properties in the meantime, in the knowledge that the houses will eventually be taken and demolished. This will then potentially have a negative impact in terms of property values for the area that may apply when and if AT gets the central government funding to buy the properties under the Public Works Act.

#### Fairness

The process seems very unfair and one-sided. It feels like AT has all the power and we have none.

#### Process

The consultation process to date has not been effective in letting people know about the project and its true scale and impact. It seems very wrong that those people most directly affected have not been contacted directly until almost the very last minute. (Indeed, some never received their letters at all.) It also seems wrong that those with properties adjoining

the proposed route have not been involved in the process either, as the project will have a massive impact on them and their property values too.

### Potential

In none of the documentation seen so far, has there been any mention of potential improvements to the public facilities in the affected area, to go along with the proposed rapid transit route itself. If the project does end up going ahead, it would be an opportunity for this area to have some extra investment in public facilities (e.g., pocket parks). If the large swathe of land is to be taken anyway, and developed with a rapid transit route and bridge, we would urge AT to ensure that some of that land is used as a buffer for neighbouring residents (e.g., along Freyburg Ave), and that it is landscaped appropriately. There is a dearth of parks in this Puhinui area, with the closest playground being at Sunnyside Reserve. With the residential intensification occurring in the area, there is a need for places for people to relax and play. Perhaps the negative outcome of a rapid transit route could be somewhat ameliorated by sensitive landscaping and investment in seating, playground equipment, plantings, etc.

### Equatability

We are not a flash area in comparison to many other parts of Auckland City. We are a strong community, however, with many people having lived here their whole lives (and some families have been here for generations). We do not have the financial ability to take this project to its legal conclusion (to the Environment Court) if necessary. We wonder if this type of project would have ever been proposed if it were in a more wealthy suburb of the city.

### **Local Board Involvement**

As our representatives to Council, we ask that the Ōtara-Papatoetoe Local Board support us in our efforts to raise awareness about this project and its impacts.

We ask that the Board require more detailed information from AT about the actual route, including properties affected (there may still be some people completely unaware their properties are affected if they did not receive their letters in the mail).

We also ask for continued support as the designation process is undertaken throughout 2023 and beyond.

### **Attachments**

1. *Southwest Gateway Programme Engagement Summary December 2017 to December 2018* <https://at.govt.nz/media/1981430/southwest-gateway-programme-summary-report.pdf> too large to attach here but available by scrolling down on the following website page: <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-transit>
2. *Southwest Gateway Programme Engagement Summary January to December 2019* <https://at.govt.nz/media/1983567/southwest-gateway-public-summary-report-sept->

[2020.pdf](#) too large to attach here but available by scrolling down on the following website page: <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-t-ransit>

3. *Airport-Botany 20 Connect Southern Local Boards 17 September 2018*

<https://www.scribd.com/document/393138223/2018-08-17-Southern-Local-Board-Cluster-Meeting-V2> or

<https://fyi.org.nz/request/8884/response/29778/attach/5/2018%2008%2017%20SouthernLocalBoard%20ClusterMeeting%20V2.pdf>



## Flood Hazard

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on flood hazard for properties near the BRT route

### Reasons for Submission:

The Assessment of Effects on the Environment (AEE) (pp. 91-92) notes that a '100 year flood' calculation is being used to in modelling to assess the impacts of flood hazard. It recommends that there be no increase in flood levels for existing authorized habitable floors that are already subject to flooding. It also notes there should be no more than a 10% average increased flood hazard for the main access to authorized habitable dwellings.

Given the recent catastrophic floods in the Auckland region and elsewhere this summer, along with the predicted ongoing changes to the climate including a greater frequency and severity of extreme natural events such as rain storms and floods, I think both AC and AT should look at whether the level of risk is acceptable to the community. At the design stage of the BRT project, AT can consider ways it can contribute to lessening flood hazard in the surrounding areas (e.g., by looking at the creation of a 'ribbon park' that would help absorb stormwater (see my other submissions on this topic) using land acquired for but not used for the BRT route infrastructure.

### Seek recommendations:

- That AT and AC reconsider the use of the '100 year flood' calculation and the no more than 10% increased flood hazard risk, and whether this level of risk is acceptable to the community given recent rainfall events and the potential for increased severity and frequency of extreme weather events in the future.
- That AT consider, at the design stage of the project, ways in which it can further reduce the flood hazard in areas surrounding the BRT route (e.g., stormwater soaked up in a 'ribbon park' created on unused acquired land.

## Land Acquisition

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

All NoRs – effects of the proposal on properties to be acquired either wholly or in part, near the BRT route

### Reasons for Submission:

The proposed BRT route, if it goes ahead, will require the acquisition of a large number of properties, either wholly or in part. This includes both residential and commercial/industrial zoned properties.

The acquisition will occur by means of the Public Works Act.

Affected land owners are confused. They are anxious. They are angry. They are sad.

At meetings with residential property owners at the Allenby Motel after letters were sent to landowners in August 2022, representatives from Supporting Growth (SG) were at pains to explain that the process would be carried out equitably and fairly. Terms such as ‘market value’ and ‘payments for moving house’ were used.

The fact remains that there are many people living along the route who do not want to move. Indeed, some will struggle to. There are people who have developed their sites into multi-generational homes, and vow to only ever ‘be carried out in a box’. Some people are in the situation of having reverse mortgages on their homes.

There is the concern, too, of ‘market rates’ and what a proposed designation on a property will do to those rates. People don’t know whether to sell early or to hold on. In any case, it is our understanding that AT doesn’t yet have the central government funding it requires for such an enormous transport building project (and significant land acquisition).

Residents have already had letters in the mail from property lawyers saying they can actually sell early if they want to, and that there is an obligation for AT to purchase the properties if they are hard to sell in the current market with a proposed designation hanging over them. This has confused people and given an added layer of anxiety and worry.

There are some who had been planning to move in the next few years (before the 10-15 year construction timeframe). They are now in limbo, not being able to sell privately (who would want to buy a property for a fair price with a designation on it?), but not yet being able to negotiate with AT about acquisition.

Those of us with properties to be acquired under the designation have been warned that there will be developers knocking on our doors to buy our properties at low prices so they can land bank and hold out for a higher price from AT close to the construction period. As

mentioned in my other submissions, this is an area where people are not always able to advocate effectively for themselves in such situations.

People we have heard of in other areas (e.g., residents affected by recent roading projects in Pakuranga) have had to fight hard to get more than the minimum value for their properties that was offered by AT and its valuers. Some people in affected properties along the BRT route, are likely to struggle with this part of the acquisition process. They will need independent support and guidance.

Some people are faced with the prospect of only part of their properties designated to be acquired. Many of them would prefer their properties be designated for acquisition in their entirety, as their properties will be either unlivable or unsellable with large chunks taken off the front for the project.

Others, who are not impacted directly by their properties being acquired, live in properties that are adjacent to designated ones. They, too, may well wish to leave the area to avoid the negative impacts of noise and vibration, etc. But they are now in a position where they will adjoin designated land, so their land value will be negatively impacted.

Sadly, the uncertainty caused since the letters of August 2022 has caused some members of our community to leave the area already. One young family we know has moved to another suburb. They have a four year old who was due to start soon as a new entrant at Puhinui School soon. But because they want certainty and continuity for their children throughout their school years, and for their kids to make friendships at primary school that continue through intermediate and high school, they have chosen to move and establish elsewhere. They were concerned that they may need to leave the area sometime when their kids are at intermediate or high school given the timeframes of the BRT project, and didn't want to take that risk. They are a loss to our community.

People need greater certainty than they have currently. To stay or to go? To sell sooner or hold out till the bulldozers are revving up? People don't know what to do. More support is going to be needed in the community to help people navigate the process and come to decisions they can live with.

#### **Seek recommendations:**

- That independent support mechanisms be put in place, funded by AT similar to 'Friend of the Submitter', to help those impacted by property acquisition to advocate for the best outcomes for themselves.

## Route and Station Options

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Route options and station options chosen for entire length of BRT (covers NoR 1, 2, 3, 4a and 4b)

### Reasons for Submission:

#### 1. Project Objectives:

Form 18 and other documentation for the NoRs note that the *primary* project objective for the Notices of Requirement are to provide a bus and rapid transit corridor that connects the key destinations of

- Auckland Airport (from the Orrs Road boundary),
- Manukau City Centre and
- Botany Town Centre.

There is also the *second* objective of providing corridors for both public transport and active modes (walking and cycling).

#### Cars and freight vehicles:

It is notable that the continued efficient use of private cars for passengers, and efficient use of road vehicles for freight are not mentioned in the list of project objectives.

#### 2. Pūkaki Creek:

Also notable is that the section of the eventual route from the airport itself to Orrs road is not part of the study area or the sections covered by the NoRs. The Assessment of Environmental Effects (AEE) section 2.1.1 addresses this, noting that, *“Through the Eastern Access Agreement, it was agreed that the form of the bridge over Pūkaki Creek would remain as a two-lane bridge in perpetuity. This bridge is located to the West of Orrs Road and is a crucial element for the future connection of the Project to Auckland Airport.”*

Indeed, if the configuration of this bridge is not altered to make it wider, or an alternative bridge structure provided, none of the overall BRT project outcomes will be achievable. The end of the NoR will see enormous traffic jams as private cars and rapid transit buses try to navigate what is already a narrow, restrictive bridge.

It seems ludicrous to continue with the social anxiety and upset being caused to affected residents and business owners, and work involved for staff at AT, SG and AC, etc., in progressing the NoRs until there is a clearer indication that the bridge can be widened or another bridge structure built over the Pūkaki Creek.

### 3. Route Options considered:

Appendix A (Volume 2) of the AEE assesses alternatives to the chosen route. I refer to this document as the AoA (Assessment of Alternatives).

Page 2 of this document notes the process of looking at alternatives should be

- transparent, robust and clearly recorded so as to be understood by others.
- In addition, an ‘appropriate range of alternatives’ should be considered, and
- The extent of options considered should be proportional to the potential effects of the options.

A range of alternatives were, indeed, considered (e.g., the ‘initial options’ in Figure 8, p. 22). Some of the alternatives followed variations of the final route presented in the NoRs. Other options went further North towards Mangere, or further South towards SH20, or further East on Chapel Road.

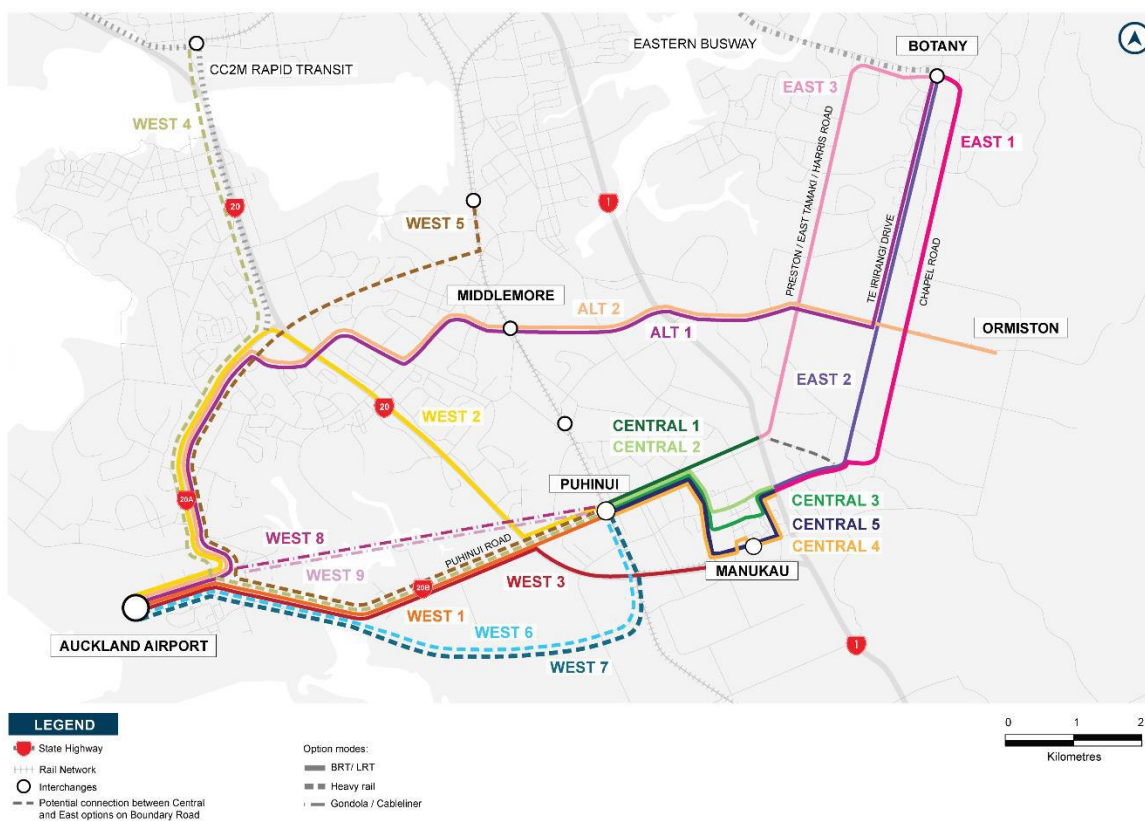


Fig 8 pg 22 Assessment of Alternatives

A shortlist was eventually chosen (map on p.66 AoA) which broadly follows Puhinui Road from Orrs Road along SH20b, over a new BRT bridge at Puhinui Station, continuing along Puhinui Road to Lambie Drive, along Lambie, winding around Hayman Park to Manukau Train Station, then winding through several tightly aligned streets in Manukau City Centre before continuing on directly to Botany Town Centre along Te Irirangi Drive.

Along that route, 12 stations (stops) have been identified where passengers can get on and off buses.

Different modes of transport were also considered as part of the process, with the final decision being rapid transit buses (electric, high frequency, large vehicles with plenty of room for passengers).

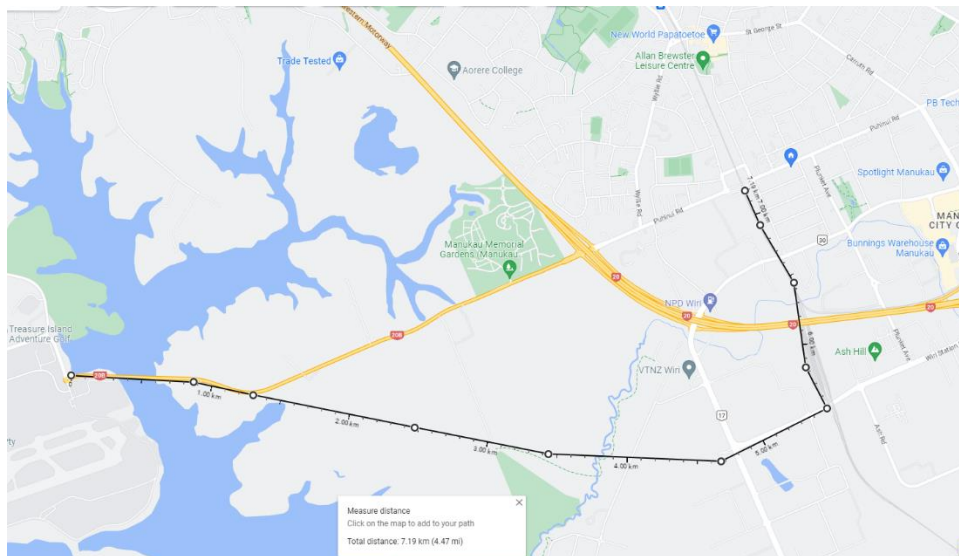
Concerns/Alternative options not in the documentation:

Going back to the primary objective of connecting the three centres – Airport, Manukau and Botany, the route chosen seems to have some significant ‘dog legs’ that will make the journey slower and less direct. In particular, the winding route around Hayman Park and back through Manukau City Centre, before finally reaching Te Irirangi Drive, appears unnecessarily convoluted.

I would like to know why some other options do not appear in the documentation to have been considered at all.

Airport-Puhinui Station

As there are no planned stations/stops between the Airport and Puhinui Station, why does the route go down SH20b and the Western end of Puhinui Road to reach Puhinui Station? Could it not have been aligned in the vicinity of the West 6/West 7 original options?



Indicative map of route West 6 or 7 (as BRT rather than heavy rail)

I note those options were originally considered as part of a heavy rail option, but I see no reason that a BRT route could not have been considered along that alignment instead, going through what is primarily rural land or land being developed for industrial or commercial use in the vicinity of Prices Road, with the eastern end approaching Puhinui Station running beside the existing heavy rail line. Aligning a BRT along here would remove the necessity to disrupt a significant number of residential and commercial land owners along Puhinui Road. Yes, there would be alternative land owners to negotiate with, but these would be fewer in number and have less significant building infrastructure already in place.

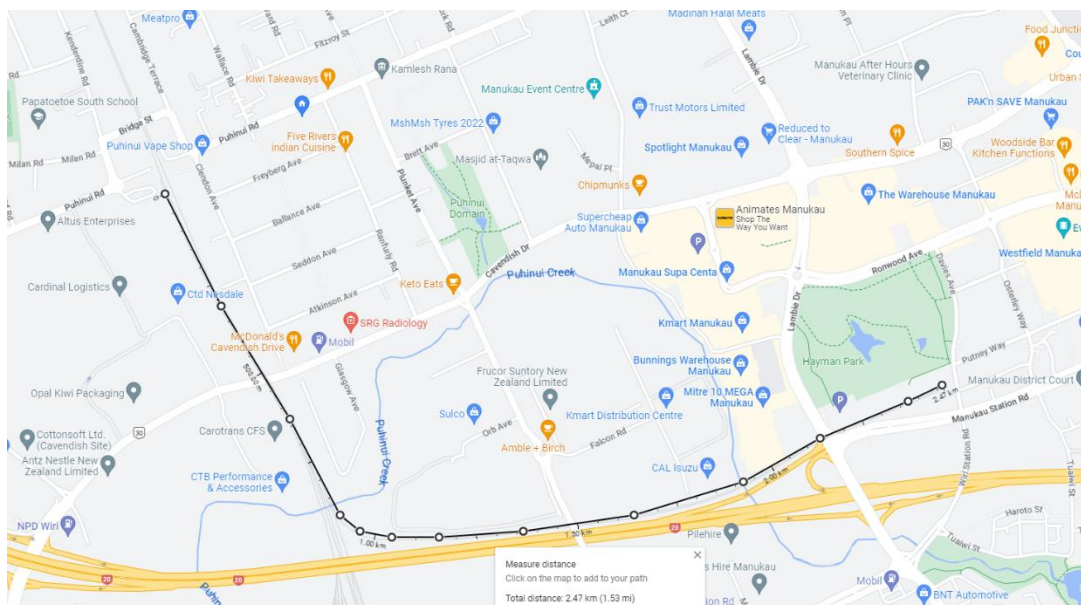
### Puhinui Station-Manukau Station

I also question why the proposed BRT route continues from Puhinui Station along Puhinui Road via a significant, large, bridged structure, to a proposed new station at the intersection of Puhinui Road and Lambie Drive, then along Lambie and around Hayman Park to the Manukau Station.

This route will require the purchase of a significant number of existing residential dwellings or part thereof, as well as some commercial zoned land. It will leave remaining residents (an future residents if the area is intensified) living within the shadow and noise of a large bridge structure.

I am aware that going down this route, along with the addition of a station at Lambie Drive, may pick up some passengers who live within walking distance of this new station. However, there are questions about how many passengers would actually access this station, referred to in the documentation (e.g., Figure 16 on p.16 of the Assessment of Transport Effects) and it may be that a more direct (i.e., faster) route between Puhinui Station and Manukau Station exists.

I cannot find anywhere in the options documentation that shows an option has been considered of constructing a BRT route either alongside or instead of the heavy rail connection that has recently been completed to link the Puhinui and Manukau Stations.



Indicative direct route Puhinui Station to Manukau Station via BRT next to or instead of existing rail line spur

Going along this route directly links Puhinui Station to Manukau Station. It would, yes, mean that some people living in walking distance from the proposed Lambie Drive station would not be so close to a BRT station, but if the primary objective of the project is to link the Airport-Manukau-Botany centres, this may be a worthwhile trade-off. There are other non-structural options such as regular shuttle buses or vans to take people from this Lambie area (and others around Papatoetoe and elsewhere on the route) directly to either Puhinui or Manukau stations to catch the BRT vehicles to either the Airport or Botany.

### Manukau Station-Te Irirangi Drive

The dog-leg in the proposed route continues from Manukau Station along Davies Ave, winding along Ronwood Ave and Great South Road before turning sharp right to travel along Te Irirangi Drive for the remainder of the journey to Botany. The Social Impact Assessment (SIA) notes in Appendix B that Westfield Manukau is planning to develop its own public transport hub near Friendship House. The SIA notes Westfield asked that a bus stop be put on Ronwood Ave. I am unsure how this request for a bus stop has turned into an entire BRT station on Ronwood Ave in the NoR documents. I would like this explained to me.

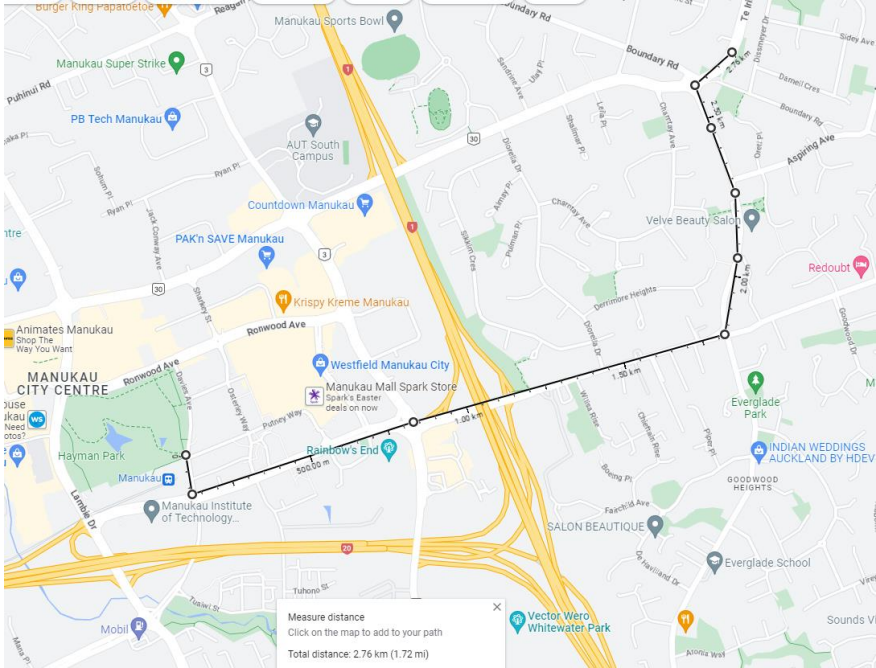
If, once again, we go back to the primary objective of getting people from the Airport-Manukau-Botany, this dog-leg seems counter-productive, adding to the length, complexity and time of the journey, not to mention the significant portions of commercial land that will need to be taken to fit the BRT into a widened carriageway. In addition, (see Fig 16 of the ATE referred to in section 4 of my submission below) it appears that adding the Ronwood station onto the route will not significantly increase patronage compared with focusing efforts on the existing Puhinui and Manukau stations.

A much more direct route that I cannot see considered in the documentation that I could find, would be to take the BRT directly from the Manukau Station along Station Road, up Redoubt Road, down Hollyford Drive (which already has an extremely wide berm for its entire length that would mean no need for property acquisition) to link with Te Irirangi Drive.

I am aware that in a number of the NoR documents, taking the BRT along Manukau Station Road and turning onto Great South Road to get to Te Irirangi was discounted as it would interfere too much with the Great South/Manukau Station/Redoubt Road intersection with car and freight traffic. This argument does not seem to have interfered with plans elsewhere on the route to interfere with traffic on existing road ways (e.g., Puhinui, Lambie, Davies, Ronwood, etc).

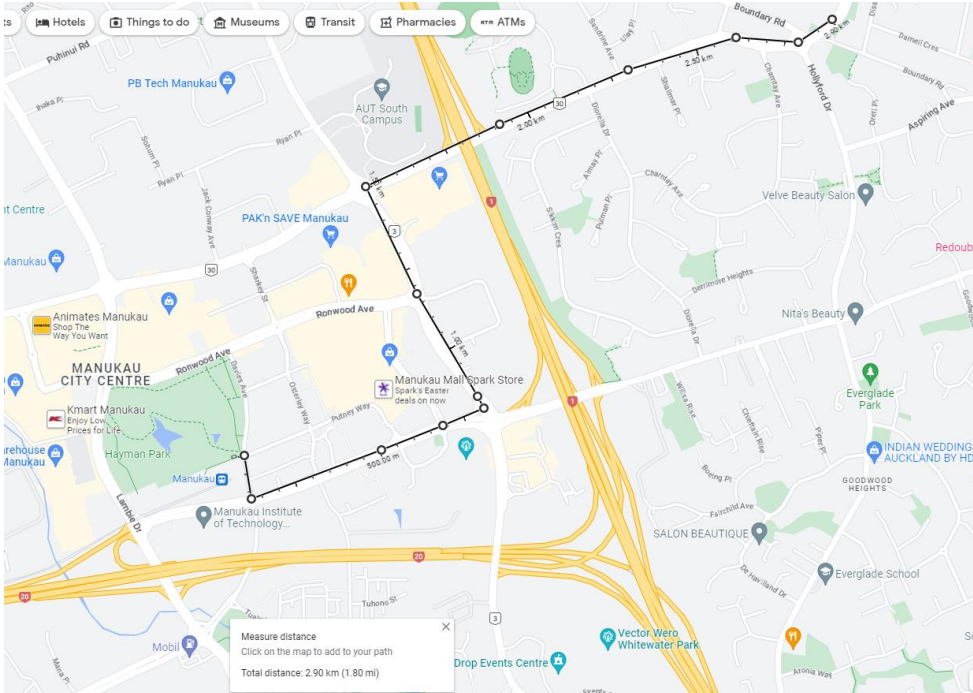
I would like this route to be investigated for its potential for the BRT, including the number of affected residential properties along Redoubt Road that may be affected, and the gradient of the road.





Potential more direct route Manukau Station to Te Irirangi Drive via Manukau Station and Redoubt Roads - Hollyford Drive

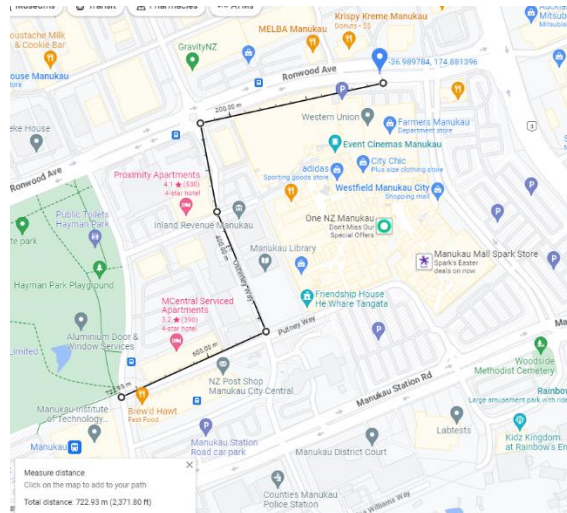
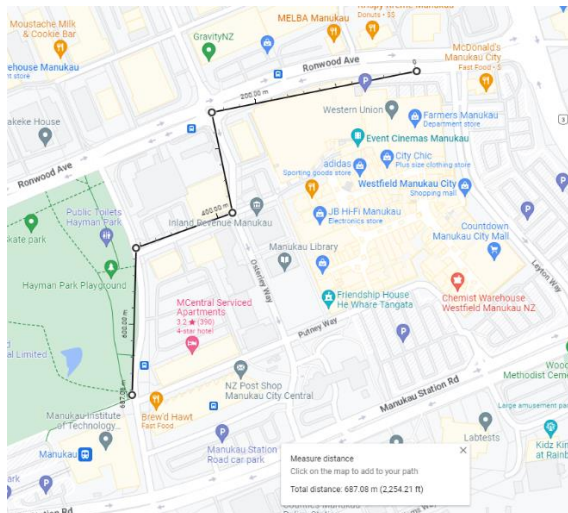
Another option could be going along Manukau Station Road, Great South Road and then to Te Irirangi Drive, to avoid the residential area along Redoubt Road along with the steep gradient of Redoubt Road to Hollyford Drive.



Potential more direct route Manukau Station to Te Irirangi Drive via Manukau Station and Great South Roads

While people closer to Ronwood Ave would not have a dedicated station there under these options, there is the shuttle bus/van idea noted above for the Lambie station catchment, and if walking infrastructure (e.g., covered ways) were improved in the Manukau City Centre streets, it is approximately 700m depending on the route taken, well within the 1km walking

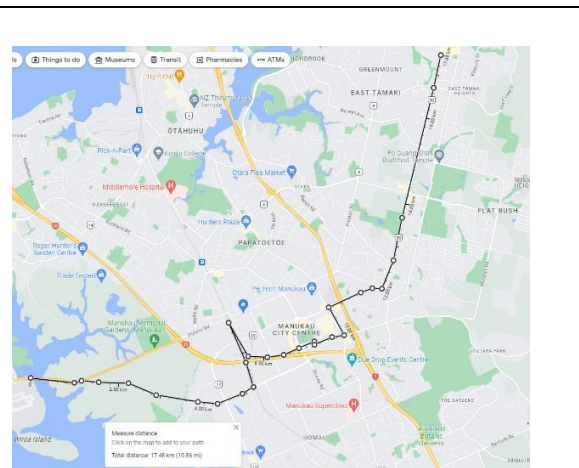
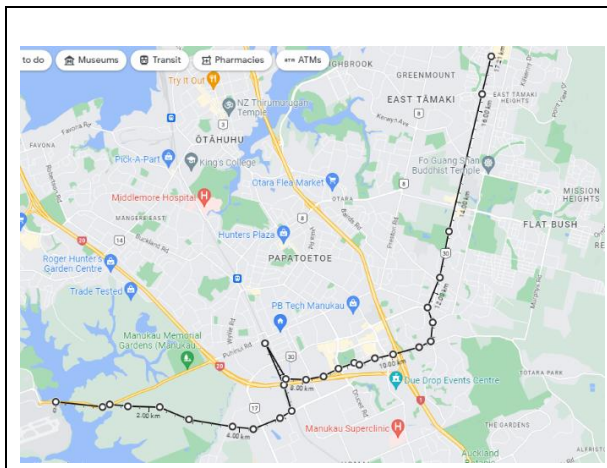
distance to a rapid transit station that is quoted elsewhere in the NoR documentation. (See approx. walking distances on maps below.)



Distances to walk from Ronwood Ave near Gt St Rd to Manukau Train Station

I would like AT to consider and let submitters know about these other options that do not seem to have been considered in the documentation. These other options would be

- more direct (avoiding the dog leg around Hayman Park/through Manukau City Centre)
- faster (with less stops)
- requiring the acquisition of fewer residential and commercial properties along the route.



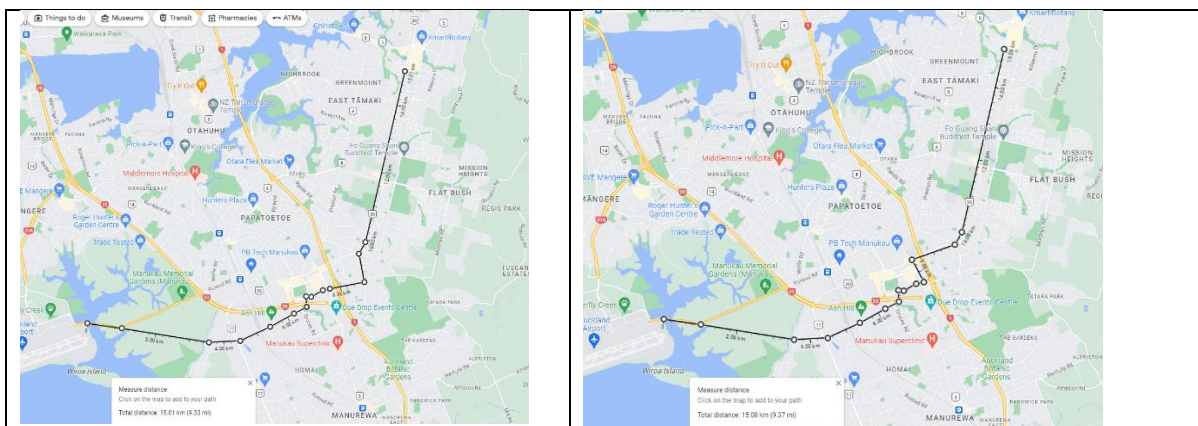
Two potential indicative alternative overall routes Airport-Manukau-Botany

Overall Route – role of Puhinui Station

When put on a map, the options I have requested be re-looked at have an obvious detour to the Puhinui Station (as does the proposed BRT in the NoRs).

Another option would be to not go through the new Puhinui Station at all. If the true main objective of the project were to link the Airport-Manukau-Botany route directly, this option would seem to directly achieve that objective. This would be another option for AT to report back on.

I imagine it would be unlikely to gain much political support given the huge amount of money that has been spent on building a very large station at Puhinui already it seems to the outside eye at least, to have been designed with the BRT bridge option firmly in mind. (The Puhinui Station’s location to the South of Puhinui Road alignment and the large verandah which has been designed to link with the proposed bridge.)



Two potential indicative alternative overall routes Airport-Manukau-Botany sans Puhinui Station

4. Station Options considered:

It appears from information in the Assessment of Traffic Effects (ATE) figure 16, which estimates daily boarding numbers at stations on the route in 2038, the expected numbers of passengers accessing the BRT by the Lambie Drive and Ronwood Ave BRT stations will be well below the expected numbers using other stations, notably the existing Puhinui and Manukau Stations.

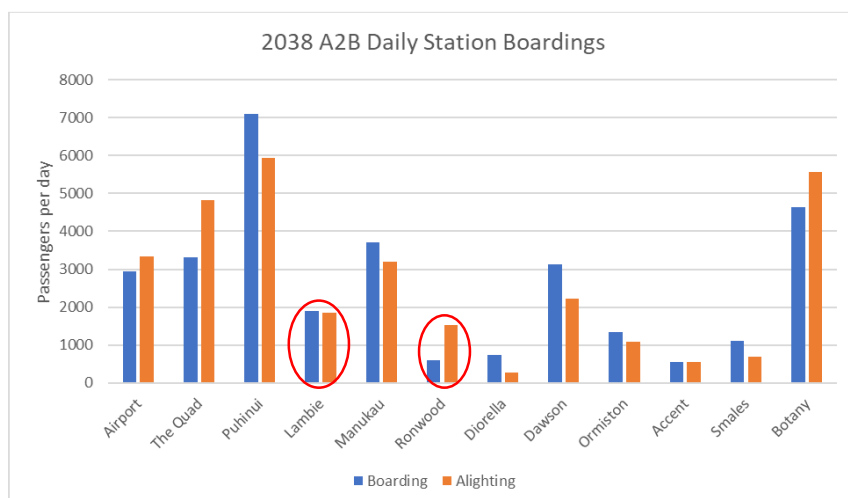


Fig 16 from ATE

This feeds into my questions about the need to take the BRT route via Puhinui Road, Lambie Drive, etc., with the dog-leg back down Davies and Ronwood Aves.

If the main objective of the project is to get people quickly and efficiently between the Airport-Manukau-Botany, the addition of smaller stations along the way such as Lambie and Ronwood seems to not directly support that objective.

(Note, too, that many of the other stations in Figure 16 above that are not associated with a shopping centre or existing major transit station, are also expecting very low daily boardings – e.g., Diorella, Accent and Smales. These stations should also be looked at again to determine whether they actually assist in achieving the main objective of getting people rapidly between the Airport and Botany.)

I also question why, in the plans shown in the NoR documentation, there are no stations located between Puhinui Station and the Airport, given the significant new development of commercial areas in the general area of Prices Road, etc.

#### Lambie Drive

The documentation, and time spent talking with AT and SG staff at meetings, seems to suggest that the main reason for going along Puhinui Road and having a station at Lambie Drive, is to provide people within walking distance of that station, the opportunity to get on and off the BRT. (With the added factor of encouraging high density 6-storey residential intensification around public transport stations.) This is mentioned in some of the documentation (e.g., p. 106 of the AoA). However, p. 107 of the document notes that the Lambie Station is a 'minor priority'.

I would like to see other, softer, non-hard-infrastructure options, researched and reported back to AC and the community. For example, frequent, rapid mini-shuttles that circulate from that Lambie-St George Street area, taking people to either the Puhinui or Manukau Stations to access the BRT.

#### Ronwood Ave

In relation to the proposed Ronwood Ave BRT station, I note (in Appendix B of the SIA) that Westfield Manukau has its own plans for expansion, including extending its current building footprint to cover the large existing open car park along the boundary with Great South Road, and developing its own public transport hub. This plan for a separate, new transport hub seems a little odd to me, given that so much resource has already gone into developing the new Manukau train station and the Manukau bus station right on the doorstep of Westfield Manukau. These relatively new bus and train stations are 700m or less from the furthest corner of the current Westfield building footprint where Farmers department store is. (Well within walking distance from the shops.) If resources were put into improving the walking and cycling surfaces leading from the shops to the bus and train stations (e.g., suitable wide shared paths, covered areas where required), it seems to me that the proposed Ronwood BRT station would be unnecessary.

I would like to see AT reconsider and explain more fully the reasoning behind the perceived need for a BRT station at the Ronwood location, given the close proximity of the existing bus and train stations to the Westfield shops. Is it something AT has agreed to in order to acquire support from Westfield Manukau given the significant disruption the construction of the proposed BRT will have on the commercial area noted in Appendix B of the SIA? I cannot see any other logical reason for locating a station at Ronwood Ave, despite having read through the documentation provided in the NoR.

#### Wyllie Road area potential station

Given the rationale for the station at Lambie Drive, which has largely been given as serving the residential catchment within walking distance of that station, why then, is there not a similar station to serve those in the Western part of Papatoetoe, in the region of the intersection of Wyllie Road with Puhinui Road? It would seem that people are required to make their way all the way to the Puhinui Station if they live anywhere near Wyllie Road/Pah Road etc., which seems to not be the same reasoning compared with the station being provided for those living in walking distance of Lambie Drive and the proposed station there.

#### SH20b Potential Station(s)

There is currently significant new development of land that was previously zoned rural, into commercial zoned properties. This is currently mainly occurring on the Southern side of SH20b in the vicinity of Prices Road. Given this commercial development, along with the fact that the Manukau Memorial Gardens are a significant destination, it seems bizarre to me that there are no BRT stops planned to serve this area of the route.

P.106 of the AoA assesses this commercial development area as being a low-density land use that does not warrant a BRT station. When talking to AT and SG staff, I was told that if people working in that area wanted to use the BRT, they would either have to get off at Puhinui Station and catch a bus or uber to work, or go all the way to the Airport, then catch a bus or uber back to work. This seems unlikely – people will just take their cars, adding to the congestion on the road network.

If the dog-leg around the Manukau City Centre with its added station goes ahead, with the delays traversing that area and the Ronwood station, why not allow a little more delay by adding in a station or stations in the vicinity of the Memorial Gardens and the new commercial zoned area near Prices Road?

#### 5. Hard Infrastructure/Mode Options:

Throughout the NoR documentation is the obvious desire to pursue a hard infrastructure approach to the perceived problem of there not currently being an effective, resilient, frequent, fast way for people to get between the Airport-Manukau-Botany. (e.g., AEE Appendix A 4.1.2.1 where non-infrastructure interventions are discounted in favour of new

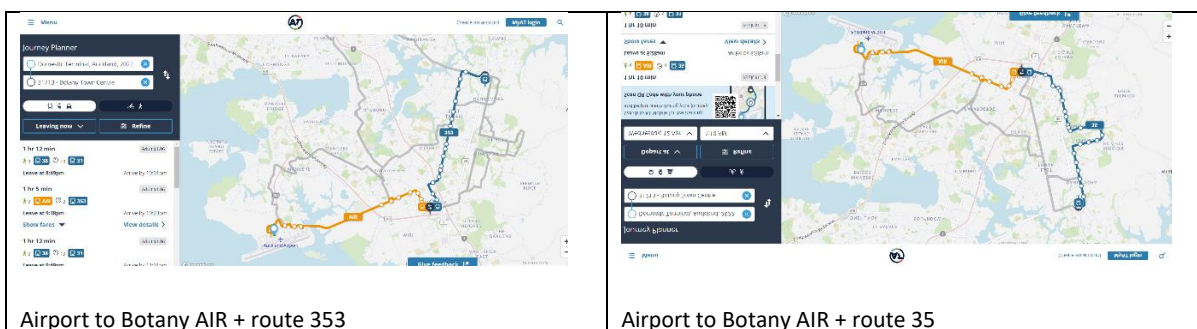
infrastructure as opportunities for the future. This seems to me, to be backwards – why not thoroughly investigate non-infrastructure interventions first (e.g., new bus routes, more frequent bus services) before embarking on costly, long-term, non-retractable infrastructure projects?

Hard Infrastructure for BRT

Section 1.3 of the AEE notes the current bus routes do not get people quickly enough from one end of the route to the other and that the area is not well-served currently by public transport. Appendix A of the AEE (the Assessment of Alternatives) section 4.1.2.1 concludes that hard infrastructure is the best option to solve the problem.

I went onto the AT Journey Planner site, to look at the current bus routes running between the Airport-Manukau-Botany.

The orange AIR bus runs frequently between the airport and Manukau bus station (adjacent to Manukau Train Station) along Puhinui and Lambie Drives. From Manukau bus station to Botany there are two main existing bus routes – the 353 bus that goes via Preston and Springs Road, and the 35 bus that goes via Chapel and Murphys Roads.



It is notable that neither of these existing bus routes between Manukau and Botany actually go via Te Irirangi Drive currently. Given that Te Irirangi Drive currently has a faster speed allowance (60kph) compared to most of Preston/Springs or Chapel/Murphy, we don't know how fast it could actually be to go by bus now if it were to go via Te Irirangi Drive. I would like to know the comparison between a bus travelling along Te Irirangi Drive between Manukau and Botany, and the current buses that go via either the 353 or the 35 route.

Te Irirangi Drive is the route for the proposed BRT. It already has a wide median which was designed with some form of rapid transit in mind. Current transit times include the slow speed bus route 353 or 35. If this section of the BRT were to be built on the median as suggested in the NoR, it may give enough of a boost to the speed of the Airport-Manukau-Botany link without the enormous disruption caused by the hard infrastructure proposed elsewhere on the route (e.g., Puhinui Road, the BRT bridge linking Puhinui Station, etc.)

I would like AT to research and report back on how long it will be expected to take to go by bus via Te Irirangi Drive both now and when the BRT would be expected to be built (10-15 years). At the moment we are comparing the time it takes to take a future BRT route

between Manukau and Botany, against how long it takes to go now via either the slower Preston/Springs or Chapel/Murphys, not via the faster Te Irirangi.

We need to be comparing apples with apples, and with the information contained in the NoR I am comparing apples with carrots.

It may be there is not as much need for a hard infrastructure approach for the entire length of the route (including the BRT bridge at Puhinui Station), if the Te Irirangi Road section were built first and bus schedules and routes were re-assessed and re-jigged, then the situation looked at again. However, understanding the need to protect/designate land ahead of time, I'd like to at least see some scenarios with the alternative route (no BRT bridge etc., at Puhinui Station, go via existing AIR bus from Airport to Manukau, then a BRT directly going along the median of Te Irirangi Drive) to compare the right fruit with the right fruit, not with a vegetable.

#### Mode Options and Public Transport Usage

This is not my area of expertise however; I would like to know how much research AT has done into the future of transport technology.

Will we still be using large scale buses in twenty years' time on fixed routes, or will there be other options? Things that come to mind are self-drive cars or mini vans that you can arrange to pick you up and drop you off exactly where you want to go. If this is the future of transport technology, will there be a need for large-scale infrastructure projects like the one planned for in the NoRs? Will we need to be planning for large buses to go along pre-determined routes? Or will we be looking at smaller-scale, more agile technologies and the opportunities that go with them?

I would like to see proof that AT has considered the future options and isn't just planning for current technology in a future world.

Living on Puhinui Road, with my office where I work from home with a window looking directly across the road to an AIR bus stop, I get to see the frequent orange AIR buses passing by. I would say that 99% of the time, they have, at most, three passengers on them. Often they go by with no passengers at all – just a driver. This does give me pause to wonder how much the proposed BRT will actually be used.

If we go to the airport we use the AIR bus, and can confirm that more passengers use it between the airport and Puhinui Station than they do between Puhinui Station and Manukau Station. Our daughter attends university at the Auckland University South Campus on Osterley Way. She often takes the AIR bus to and from her lectures. She calls it her 'personal uber' as she is generally the only person on the bus, and it drops her almost outside our door.

I realise the proposed BRT isn't planned to be constructed for 10-15 years, but I really do wonder what 'push' factors will cause people to use the service over and above the 'pull' factor of a new, purpose-built, frequent rapid bus infrastructure.

I would like to see information from AT to know they have considered the current low patronage of sections of the AIR bus route, and how this will change with a new BRT system in place.

#### Seek recommendations:

- In relation to section 1 above, delay continued development of the NoRs until crucial decisions are made about the bridge (or an alternative bridge structure) over Pūkaki Creek.
- In relation to section 2 above, require AT to reconsider and research and report back on alternative routes specifically:
  - BRT route that goes from airport directly to Puhinui Station *not* using Puhinui Road, but instead in the area of the rejected West 6 and 7 routes + adjacent to existing train line South of Puhinui Station
  - BRT route on land adjacent to or currently used for the rail link from Puhinui Station to Manukau Station
  - BRT route without the dog-leg through Manukau City Centre – go directly from Manukau Station, to Great South Road, then up Te Irirangi, or up Redoubt to Hollyford down to Te Irirangi.
  - BRT route via the rejected West 6 and 7 routes, from Airport to Manukau and on to Botany without going via Puhinui Station at all
- In relation to section 3 above, and at the same time as reconsidering the need for the BRT route to follow Puhinui/Lambie/Hayman Park/Davies/Ronwood at all, require AT to reconsider, research and report back on the need for the BRT stations that appear to expect relatively low daily passenger boardings as shown in Fig 16 of the ATE including:
  - Lambie Drive
  - Ronwood Ave
  - Diorella, Accent and Smales
  - Also in relation to section 3 above, require AT to reconsider, research and report back on an additional station location between Puhinui Station and SH20 in the vicinity of the intersection of Wyllie Road with Puhinui Road to serve the residential area of western Papatōetoe that not within easy walking distance of Puhinui Station.
  - Also in relation to section 3 above, require AT to reconsider, research and report back on additional station locations between Puhinui Station and the Airport to serve the Manukau Memorial Gardens and the new commercial development occurring on the southern side of SH20b along the proposed BRT route.



- In relation to section 4 above, require AT to reconsider and research and report back on the necessity for this hard infrastructure as a response to the perceived problem.
  - This to include running scenarios of the time it takes to travel by bus now along Te Irirangi Drive from Manukau to Botany, and to trial existing AIR bus Airport-Manukau (no BRT bridge at Puhinui) with Te Irirangi median strip BRT to take passengers directly from Manukau Station to Botany via Te Irirangi Drive rather than on the current 353 or 35 routes.
  - To also include external research into future technologies and their impact on the value/appropriateness of the fixed-route BRT (e.g., self-drive cars/vans that are agile and able to go via any route)
  - To show how AT plans to increase patronage of the current poorly used AIR bus route between Puhinui Station and Manukau Station

## Surplus Designated Land Post-Construction

### Specific Parts of Designation:

NoR1, NoR2, NoR3, NoR4a and NoR4b

Land left-over after construction of BRT – submission on what that land will be used for after construction.

### Reasons for Submission:

If it goes ahead, the BRT will cause massive disruption to the local community. As shown in the Social Impact Assessment, the people who live in NoR 2 and 3 are already in a situation of social deprivation, economically they are not well off, with low household incomes, there are a lot of people renting short-term, it is a relatively transient population despite some people having lived in the area for many years. (In some cases, for generations.) In addition, the Puhinui/South Papatoetoe area is very poorly served with open space and areas for active recreation such as playgrounds. I have had discussions about this in past years with AC parks and community facilities staff who have confirmed this.

The BRT will, effectively, cut the community in half, North to South. There will be some formal road crossings provided, though the location and type of these is yet to be determined. Some may need to be bridged.

The community will need to absorb significant disruption during the construction of the route. The community will be left with a significant new transport route including a large, imposing BRT bridge structure traversing the area.

I am concerned in reading the various NoR documents (see my other submissions) that it appears the left-over land that has been designated and acquired will be used for residential activity after construction of the BRT. (See map in Figure 15 of the AEE.)

The map shows the land not used for the construction of the BRT on the Southern side of Puhinui Road in NoR3, zoned for 'Mixed House Urban Zone – Modified by A2B Team'. Does this mean that any left-over land will be zoned for some sort of intensive residential use? Left over land on the Northern side of Puhinui Road in the area of Puhinui School may also be in a similar situation.

Though I know the philosophy of developing high intensity residential land use near rapid transit stations is embedded in AC's and central government's plans, do we really, truly, want to rely on either the HANA or MANA Airport noise mitigation packages, or 'responsible developers' (Assessment of Traffic Noise Effects p.x) to ensure the people living in such high density residential buildings are adequately protected from the noise, vibration and visual over-looking of a BRT bridge? If the land is zoned Mixed Use Urban Zone, and if this means

people will be living in homes built on land left-over from the construction of the BRT, there need to be strict building *requirements* on developers, that are resolutely enforced by AC.

### Potential for Good

It seems to me, for a number of reasons, that a better way forward for the left-over land would be to rezone as open space and develop a high-quality 'ribbon park' the length of Puhinui Road, linked in with the proposed walking and cycling paths.

A ribbon of green space alongside the BRT could be interspersed with pocket parks, community gardens, basketball courts, and playgrounds. This would 'give back' to a community that has paid a high price for the connectivity of people living and working at Botany and the Airport.

Planting along the green ribbon would add to the visual amenity of the area post-construction, and could also go some way towards government commitments to mitigating the effects of climate change, and the Urban Forest Strategy.

It would also be likely to give 'brownie points' to AT/AC and be a way to bring the community alongside to support the overall BRT project. Engagement in and positivity about the A2B BRT project in the local area is not currently high. If the project were seen to leave something positive for the remaining community in its wake, I think this would go some way to ameliorating people's concerns and mitigating the effects of the BRT construction and operation.

It would help address the lack of public active open space areas in the vicinity, adding to people's health and well-being in what is a socially and economically deprived area. It would also encourage more people to use the walking and cycling aspects of the BRT project. It would mean more people walking and cycling in the area for fun and recreation, rather than just for getting from A to B.

It would also provide something of a green buffer for properties adjoining properties that are to be acquired for the construction of the BRT. Planting trees on the boundary, in particular, would help in some ways to mitigate the visual and noise impacts of the BRT.

### **Seek recommendations:**

- That any left-over designated land be rezoned as open space and developed as a high quality ribbon park with associated facilities along Puhinui Road, Te Irirangi Drive and elsewhere along the BRT route



11 April 2023

File ref: AUP NOR 4b

Planning Technician  
Auckland Council  
Private Bag 92300  
Auckland 1142

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Dear Sir/Madam

**SUBMISSION ON A REQUIREMENT FOR DESIGNATION OF LAND UNDER S.168(2) OF THE RESOURCE MANAGEMENT ACT 1991:**

**NOTICE OF REQUIREMENT FOR BUS RAPID TRANSIT – ALTERATION TO DESIGNATION 6717 - WIDENING OF SH20B CORRIDOR BETWEEN THE SH20/20B INTERCHANGE AND THE INTERSECTION OF MANUKAU MEMORIAL GARDENS (NOR 4B), BY REQUIRING AUTHORITY: WAKA KOTAHI NEW ZEALAND TRANSPORT AGENCY**

**To:** Auckland Council

**Name of submitter:** Heritage New Zealand Pouhere Taonga

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
2. HNZPT could not gain an advantage in trade competition through this submission.
3. HNZPT submission is on the Notice of Requirement for Designation (NoR 4b) in the Auckland Unitary Plan (AUP) to provide for a Bus Rapid Transit corridor, walking, cycling facilities and associated infrastructure.
4. HNZPT acknowledges that the proposed BRT corridor is a significant infrastructure project for Auckland Transport and because it is within a predominantly urban environment there will be changes to the existing environment. It is also understood that there is the need to ensure the city has a transport network that can respond to the "diverse and changing needs" (AEE, page 115) of both the existing communities and future generations. HNZPT supports the purpose of planning for a well-functioning urban environment through the improvement of public transport access and enabling alternative transport facilities such as walking and cycling. HNZPT also supports the protection of the corridor through designation.
5. Nevertheless, of focus for HNZPT is for the identification, protection, preservation, and conservation of historic heritage (HNZPTA) and advocate that historic heritage is fully considered in accordance with section 6(f) of the Resource Management Act 1991 (RMA). Historic heritage, being specifically identified as a national importance under Section 6(f) the RMA. The definition of historic heritage under Part 2 of the RMA includes archaeology. Therefore, effects on built heritage and archaeology,



in addition to effects on Mana Whenua must be taken into account by Council when assessing the effects of NoR 4b.

6. While it is stated in the December 2022 report, Assessment of Archaeological Effects that there are no identified archaeological or historic heritage items that will be directly affected there is the possibility for unrecorded sub-surface archaeological sites to exist.
7. The Archaeological report recommends the preparation and implementation of a Historic Heritage Management Plan (HHMP) alongside a 'General Archaeological Authority' as the mitigation mechanisms for the protection and management of historic heritage within the designation corridor.

**The specific parts of the Notice of Requirement that Heritage New Zealand's submission relates to are:**

8. No previous engagement with HNZPT.
9. Section 11 Engagement of the AEE sets out the overview of the partner, stakeholder and public engagement that has been undertaken in informing and development of the NoR 4b documents. This is of concern to HNZPT because of the extent of potential effect the proposed works within the designation corridor will have on known and potential historic heritage.
10. HNZPT does not support the use of the HHMP as it is presently proposed.
11. HNZPT is concerned that while there have been both archaeological and built heritage assessment reports completed for the entire length of the Botany to the Auckland Airport (NoR 1 – 4b) the mitigation of the effect of the designation and future construction of the Bus Rapid Transit corridor, walking and cycling facilities on the known and potential historic heritage will not be managed until the Outline Plan of Works stage.
12. The framework of the proposed HHMP conflates matters relating to historic heritage under the RMA and archaeological requirements provided for under the HNZPTA 2014 with respect to archaeological monitoring, investigation, and reporting. This is an unnecessary duplication of HNZPTA archaeological processes, where the archaeological authority will have its own separate Archaeological Works Plan required to be adhered to under that process.
13. Heritage New Zealand Pouhere Taonga **oppose** the Notice of Requirement (NoR 4b).
14. **The reasons for Heritage New Zealand's position are as follows:**
15. The consideration, management and mitigation of effects from the purpose of the designation on known or potential Historic Heritage should be addressed through the NoR process instead of being deferred to the Outline Plan process.
16. The HHMP duplicates HNZPTA processes, such as an Archaeological Authority that will be required to be obtained before construction; and that should be included at the Outline Plan stage.
17. The protection of historic heritage, and the remedy and mitigation of "any residual" effects are more appropriately addressed through the existing NoR process.



18. Reliance on the Accidental Discovery Protocol with respect to archaeological sites is inappropriate as there is already assessment of the designation corridor that there is the potential for sub-surface archaeology and the need for an Archaeological Authority to be obtained under the HNZPA 2014. Noting that the Accidental Discovery Standards E11.6.1 and E12.6.1 as set out in the Auckland Unitary Plan (Operative in Part) apply where an Archaeological Authority from HNZPT is not otherwise in place.
19. **Heritage New Zealand seeks the following decision from Council:**
20. The objective of the HHMP is rewritten to remove all duplication of processes with the HNZPTA.
21. The purpose of the HHMP should be focussed on the provision details such as:
- Roles, responsibilities and contact details of the project personnel, Requiring Authority's representative, Mana Whenua and HNZPT while are involved with heritage and archaeological matters.
  - Provision for access for Mana Whenua to carry out tikanga and cultural protocols.
  - Methods for protecting or minimising adverse effects on heritage and archaeological sites within the designation during works (for example fencing to protect form construction works).
  - Advice that the Accidental Discovery Standards E11.6.1 and E12.6.1 as set out in the Auckland Unitary Plan (Operative in part) shall apply when an archaeological Authority from HNZPT is not otherwise in place.
  - Methods for interpretation and appropriate public dissemination of knowledge gained from heritage investigations.
22. **Heritage New Zealand wishes to be heard in support of our submission.**
23. **If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

Yours sincerely

*BHParslow*

pp for Sherry Reynolds  
Director Northern Region

Address for service: Alice Morris  
[amorris@heritage.org.nz](mailto:amorris@heritage.org.nz)  
PO Box 105 291  
Auckland City 1143

Form 21

Submission on requirements for designations

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** Aotearoa Towers Group (ATG)  
Private Bag 92161  
Auckland 1142

Chorus New Zealand Limited (Chorus)  
PO Box 632  
Wellington

Connexa Limited (Connexa)  
167 Victoria St West  
Auckland

One New Zealand (One NZ) (formally Vodafone New Zealand Ltd)  
Private Bag 92161  
Auckland 1142

Spark New Zealand Trading Limited (Spark)  
Private Bag 92028  
Auckland 1010

Two Degrees Mobile Limited (2degrees)  
PO Box 8355  
Symonds Street  
Auckland 1150

These parties are making a joint submission and for the purposes of this submission are referred to collectively as the **Telecommunications Submitters**.

**The Proposal:**

This is a submission on the following notices of requirement by Waka Kotahi NZ Transport Agency and Auckland Transport for transport projects from Botany to Auckland International Airport:

- Alteration of Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport;
- Bus Rapid Transit – SH20/20B Interchange to Orrs Road (Auckland Transport)
- Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange (Auckland Transport)
- Rongomai Park to Puhunui Station (in the vicinity of Plunket Avenue) (Auckland Transport)
- Bus Rapid Transit – Botany to Rongomai Park (Auckland Transport)

**The Telecommunications Submitters are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.**

**The specific parts of the notice of requirement that this submission relates to are:**

The designations in their entirety, and in particular the conditions of the designations that relate to network utilities.

**The Telecommunications Submitters' submission is that:**

The Telecommunications Submitters have no position on the overall Botany to Auckland International Airport package of transport projects but seek to ensure that existing and potential future telecommunications infrastructure in the project corridor are adequately addressed. The Telecommunications Submitters oppose the proposed designations unless the matters outlined in this submission are satisfactorily addressed.

The companies collectively deliver and manage the majority of New Zealand's fixed line/fibre and wireless phone and broadband services in New Zealand. The network utility operators in the telecommunications sector deliver critical lifeline utility services (as per Schedule 1 to the Civil Defence Emergency Management Act 2002) including infrastructure to support emergency services calls. It is also critical for supporting social and economic wellbeing and provides opportunities for work from home/remote work



solutions through fast internet connections by fibre and/or wireless means which promotes a lower carbon economy by supporting measures to reduce travel demand.

This equipment is often located in road corridors which act as infrastructure corridors as well as just transport corridors. The works enabled by the proposed designations will affect existing infrastructure that will need to be protected and/or relocated as part of the proposed works. Reasonable access for maintenance and access for emergency works at all times will need to be maintained. In addition, the design and construction of the works should take into account any opportunities for new infrastructure to be installed which is preferable to trying to retrofit necessary telecommunications/broadband infrastructure later due to disruptions and/or incompatibility with project design.

### **Existing Infrastructure**

A summary of existing infrastructure located in the project footprints is as follows:

- Chorus fibre and copper lines.
- 8 mobile network sites operated by the various mobile network providers.

### **Future Infrastructure Requirements**

Network utility operators need to integrate necessary services into infrastructure projects such as transport projects. It is most efficient to coordinate any such services with the design and construction of a project, rather than trying to retrofit them at a later date. This process does not always run smoothly. To provide a recent example, Spark has had substantial issues trying to negotiate with the Public Private Partnership (PPP) operator of the Transmission Gully project in the Wellington Region to install services to provide telecommunications coverage along that length of road. This process proved to be very difficult as there was no requirement to consult and work with relevant network utility operators in the designation conditions, and post completion of the project design and PPP contracting it has proved to be very challenging to try to retrofit necessary telecommunications infrastructure into the design of this project.

Spark achieved a more satisfactory outcome through participation as a submitter in the Auckland East West Link and Warkworth to Wellsford (W2W) project designation conditions where there was a specific obligation for the Requiring Authority to consult with network utility operators as part of the detailed design phase of the project to identify opportunities to enable, or to not preclude, the development of new network utility including telecommunications infrastructure where practicable to do so. There was

an associated obligation in that condition to report on opportunities considered and whether or not they had been incorporated into the design in the outline plan(s)<sup>1</sup>.

Whilst there is no direct obligation on the requiring authority to accommodate such works/opportunities, a provision to ensure the matter is properly considered during the design phase through consultation with network utility operators, which sets appropriate expectations and ensures these opportunities are properly explored, is reasonable. In the case of telecommunications, this enables proper consideration of making provision for communications that support the function of the road. This should be a consideration distinct from protecting or relocating existing network utilities affected by the project which is the focus of the current proposed conditions.

The Telecommunications Submitters seek an equivalent condition to that included in the W2W designation conditions to address this.

### **Consultation with Telecommunications Network Utility Operators**

Key to the outcomes the Telecommunications Submitters are seeking is to ensure they are adequately consulted by the requiring authorities over effects on their existing infrastructure, as well as being provided the opportunity to discuss any future requirements so this can be considered in the project design. Whilst the notices of requirement have a Network Utility Management Plan (NUMP) condition, this does not specify who the relevant entities are to be consulted on development of that plan. The Assessment of Environmental Effects for each notice sets out the relevant utility providers who have assets within and around the proposed designations. This specifically includes Chorus (in regard to communications lines). However, the other companies party to this submission are not mentioned and therefore there is a concern they will not be consulted as part of the NUMP development for each stage.

Spark, One NZ and 2degrees operate mobile phone/wireless broadband networks which are often include facilities located in roads. In addition, Spark has sold its fixed mobile asset infrastructure (e.g. their poles) to Connexa, and similarly One NZ has sold its fixed mobile assets to ATG (which will rebrand in due course to FortySouth). Accordingly, the operating landscape for telecommunications companies and who may be affected by these projects has become quite complex. Given this complexity, an advice note to the NUMP condition is proposed to provide more clarity on which telecommunications/broadband operators may be affected.

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<sup>1</sup> East West Link Condition NU2, W2W Condition 24A

**The Telecommunications Submitters seeks the following decision from the Requiring Authority:**

Amend the NUMP condition by adding an advice note for each notice of requirement as follows:

***Network Utility Management Plan (NUMP)***

- (a) A NUMP shall be prepared prior to the Start of Construction for a Stage of Work.*
- (b) The objective of the NUMP is to set out a framework for protecting, relocating and working in proximity to existing network utilities. The NUMP shall include methods to:
  - (i) provide access for maintenance at all reasonable times, or emergency works at all times during construction activities;*
  - (ii) manage the effects of dust and any other material potentially resulting from construction activities and able to cause material damage, beyond normal wear and tear to overhead transmission lines in the Project area; and*
  - (iii) demonstrate compliance with relevant standards and Codes of Practice including, where relevant, the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances 2001; AS/NZS 4853:2012 Electrical Hazards on Metallic Pipelines; and AS/NZS 2885 Pipelines – Gas and Liquid Petroleum.**
- (c) The NUMP shall be prepared in consultation with the relevant Network Utility Operator(s) (including Auckland International Airport Limited who have existing assets that are directly affected by the Project.*
- (d) The development of the NUMP shall consider opportunities to coordinate future work programmes with other Network Utility Operator(s) where practicable.*
- (e) The NUMP shall describe how any comments from the Network Utility Operator (including Auckland International Airport Limited) in relation to its assets have been addressed.*
- (f) Any comments received from the Network Utility Operator (including Auckland International Airport Limited) shall be considered when finalising the NUMP.*

- (g) Any amendments to the NUMP related to the assets of a Network Utility Operator (including Auckland International Airport Limited) shall be prepared in consultation with that asset owner.

**Advice Note:**

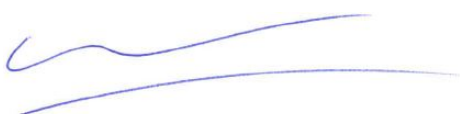
**For the purposes of this condition, relevant telecommunications network utility operators include companies operating both fixed line and wireless services. As at the date of designation these include Aotearoa Towers Group, Chorus New Zealand Limited, Connexa Limited, One New Zealand Limited, Spark New Zealand Trading Limited and Two Degrees Mobile Limited (and any subsequent entity for these network utility operators).**

Add a new condition to each notice of requirement as follows:

**XX: The Requiring Authority shall consult with Network Utility Operators during the detailed design phase to identify opportunities to enable, or not preclude, the development of new network utility facilities including access to power and ducting within the Project, where practicable to do so. The consultation undertaken, opportunities considered, and whether or not they have been incorporated into the detailed design, shall be summarised in the Outline Plan or Plans prepared for the Project.**

The Telecommunications Submitters do wish to be heard in support of its submission.

If others make a similar submission, the Telecommunications Submitters will consider making a joint case with them at the hearing.



Signature of submitter  
(Chris Horne, authorised agent for the Telecommunications Submitters)

Date: 5 April 2023

**Address for service of submitter:**

Chris Horne

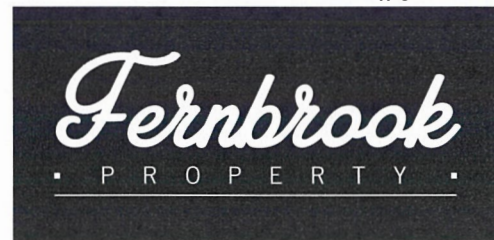
Incite

PO Box 3082

Auckland

**Telephone:** 0274 794 980

**E-mail:** [chris@incite.co.nz](mailto:chris@incite.co.nz)



LEVEL NINE, 148 QUAY STREET  
PO BOX 3515, AUCKLAND 1140  
NEW ZEALAND  
TELEPHONE (64-9) 366 6259

11 April 2023

**Submission on requirement for designation subject to public notification by Auckland Council**

**To:** Auckland Transport

**Name of submitter:** Fernbrook Property (PD) Limited (**Fernbrook**)

This is a submission on a notice of requirement from Auckland Transport for a designation in relation to the provision of a bus rapid transit corridor that connects key destinations from Orrs Road (Auckland Airport boundary), with Manukau City Centre and Botany Town Centre and alterations to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport.

Fernbrook is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Without limitation, the specific parts of the notice of requirement that Fernbrook's submission relates to are Notice of Requirements 4a and 4b (the **NoR**) as it relates to the Puhinui Precinct as described by I432 of the Auckland Unitary Plan (**Precinct**). Fernbrook is the owner of a property at 31 Prices Road. Fernbrook's property is within the Precinct and the Precinct relies upon roading connectivity to Puhinui Road within the NoR, primarily at the signalisation intersection with Campana Road (which will also serve Auckland International Airport Limited's (**AIAL**) proposed Park and Ride facility (**PnR**)).

Fernbrook's submissions are that:

1. Bulk earthworks and civil works within the Precinct are now either complete or substantially underway such that the NoR should take more account of the needs of the Precinct and connectivity to the section of Puhinui Road between Orrs Road and State Highway 20. The NoR references that the signalised intersection with Campana Road will serve AIAL's PnR but that intersection is also the primary connection for the Precinct to Puhinui Road. AIAL have consented a realignment of Prices Road to link to the signalisation intersection with Campana Road but as yet have failed to deliver same, despite the first stage of the PnR now being operational. The NoR

should include the designation of the realignment of Prices Road to link to the signalisation intersection with Campana Road.

2. Until the Precinct is connected by AIAL to the signalised intersection at Campana Road the NoR needs to account for the Precinct's continued reliance upon the existing intersection of Prices Road and Puhinui Road.
3. The NoR also affords the opportunity to provision for traffic associated with the full development of the Precinct. The Precinct establishes a permitted traffic movement threshold but that level was set at a time when the receiving traffic and roading environments were very different to that proposed by the NoR, and the full development of the Precinct will enable greater economic opportunities without any adverse transportation or environmental effects.
4. Auckland Council approved resource consents allocate pro-rata shares of the permitted traffic movements to the various landowners within the Precinct based upon their share of the total gross land area of the Precinct. Those allocations (and the associated monitoring conditions) can be removed in recognition that the roading environment can accommodate the full development of the Precinct. Alternatively, those allocations will need to be revised because the NoR reduces the gross land area of the Precinct.

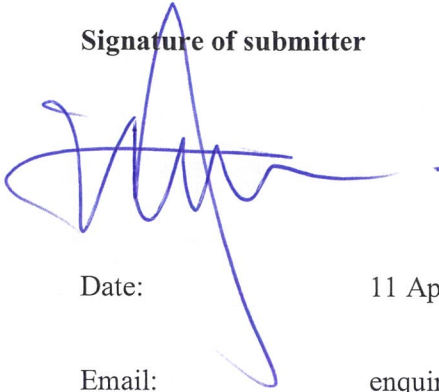
Fernbrook seeks the following recommendations or decisions from Auckland Council:

- That the extent of the NoR be broadened to include the realignment of Prices Road that links to the signalisation intersection with Campana Road. That road, which has yet to be constructed by AIAL, serves as the primary connection for the Precinct to Puhinui Road.
- That, pending the connection by AIAL to the signalised intersection at Campana Road, the NoR accounts for the Precinct's continued reliance upon the existing intersection of Prices Road and Puhinui Road.
- That the NoR recognises the roading environment can now also accommodate traffic associated with the full development of the Precinct.
- That Auckland Council deletes the conditions of consents that allocate a pro-rata share (and associated monitoring) of the permitted traffic movements to the various landowners within the Precinct in recognition the roading environment can now also accommodate traffic associated with the full development of the Precinct. Alternatively, Auckland Council revise those conditions of consent to account for the reduced total gross land area of the Precinct.

Fernbrook wishes to be heard in support of its submission.

If others make a similar submission, Fernbrook will consider presenting a joint case with them at the hearing.

Signature of submitter

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Date: 11 April 2023

Email: enquiries@fernbrook.co.nz  
Telephone: 0274 450-039  
Postal address: P.O. Box 911361, Auckland 1142  
Contact person: Alistair White



**Submission on the Notices of Requirement for the Airport to Botany Bus Rapid Transit Project lodged by Waka Kotahi NZ Transport Agency and Auckland Transport as requiring authorities under the Resource Management Act 1991**

**TO:** Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142

**SUBMISSION ON:** Notices of Requirement ("**NoRs**") for the Airport to Botany Bus Rapid Transit Project

**FROM:** Watercare Services Limited ("**Watercare**")

**ADDRESS FOR SERVICE:** Mark Bishop  
Regulatory & Policy Manager  
Watercare Services Ltd  
Private Bag 92 521  
Wellesley Street  
AUCKLAND 1141  
Phone:022 010 6301  
Email: [Mark.Bishop@water.co.nz](mailto:Mark.Bishop@water.co.nz)

**DATE:** 11 April 2023

## 1. INTRODUCTION

- 1.1 Watercare is pleased to have the opportunity to make a submission on the five NoRs for the Airport to Botany Bus Rapid Transit Project ("**Project**") lodged by Waka Kotahi NZ Transport Agency ("**Waka Kotahi**") and Auckland Transport as requiring authorities under the Resource Management Act 1991 ("**RMA**"), and in particular:
- (a) NoR lodged by Waka Kotahi NZ Transport Agency to alter Designation 6717 State Highway 20B - State Highway 20 to Auckland International Airport;
  - (b) NoR lodged by Auckland Transport for a new designation to widen Puhinui Road between the SH20/SH20B Interchange and Orrs Road to provide for a Bus Rapid Transit corridor and walking and cycling facilities;
  - (c) NoR lodged by Auckland Transport for a new designation to widen the existing Puhinui Road between Plunket Avenue and east of the SH20/SH20B Interchange to provide for a Bus Rapid Transit corridor and walking and cycling facilities;
  - (d) NoR lodged by Auckland Transport for Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue); and

(e) NoR lodged by Auckland Transport for a new designation to widen Te Irirangi Drive between Botany and Rongomai Park to provide for a Bus Rapid Transit corridor and walking and cycling facilities.

1.2 Watercare recognises the aim of the NoRs is to improve connections between the major centres of Botany, Manukau, Auckland Airport and their employment areas to existing and intensifying residential areas in southern and eastern Auckland.

1.3 Watercare neither supports nor opposes the NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made to confirm the NoRs responds to the issues raised in this submission and avoids, remedies or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.

1.4 Watercare could not gain an advantage in trade competition through this submission.

## 2. WATERCARE – OUR PURPOSE AND MISSION

2.1 Watercare is New Zealand's largest provider of water and wastewater services. We are a substantive council-controlled organisation under the Local Government Act 2002 ("**LGA**") and are wholly owned by Auckland Council ("**Council**"). Watercare has a significant role in helping Auckland Council achieve its vision for the city. Our services are vital for life, keep people safe and help communities to flourish.

2.2 Watercare provides integrated water and wastewater services to approximately 1.7 million people in the Auckland region. Over the next 30 years, this could increase by another 720,000 people, potentially requiring another 313,000 dwellings along with associated three waters infrastructure. The rate and speed of Auckland's population growth puts pressure on our communities, our environment, and our housing and infrastructure networks. It also means increasing demand for space, infrastructure, and services necessary to support this level of growth.

2.3 Under both the LGA and the Local Government (Auckland Council) Act 2009, Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in our statement of intent, be a good employer, and exhibit a sense of social and environmental responsibility.<sup>1</sup>

2.4 Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan and the Auckland Future Urban Land Supply Strategy.

2.5 Watercare is also required to manage our operations efficiently with a view to keeping overall costs of water supply and wastewater services to our customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of our assets.<sup>2</sup>

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<sup>1</sup> LGA, s 59.

<sup>2</sup> Local Government (Auckland Council) Act 2009, s 57.

### 3. SUBMISSION POINTS AND RELIEF SOUGHT

- 3.1 This is a submission on all the NoRs that were publicly notified on 10 March 2023. In particular, this submission relates to the NoRs as they may potentially impact or interact with existing, or potential future, water and wastewater services.
- 3.2 Watercare recognises the aim of the NoRs is to improve connections between the major centres of Botany, Manukau, Auckland Airport and their employment areas to existing and intensifying residential areas in southern and eastern Auckland.
- 3.3 As noted previously, Watercare neither supports or opposes these NoRs (ie it is neutral as to whether the NoRs are confirmed or not). Watercare seeks to ensure that any decisions made on the NoRs responds to the issues raised in this submission and avoids, remedies, or mitigates potential adverse effects on Watercare's ability to provide water and wastewater services now and in the future.
- 3.4 Watercare acknowledges the proactive process to engagement from Waka Kotahi and Auckland Transport during the development of these NoRs including through discussions with the Supporting Growth Alliance, and the project work that preceded the Future Urban Land Use Strategy.
- 3.5 Watercare would like to ensure that in the future there is an active and continual process set up by the requiring authorities to recognise that third party infrastructure providers, including Watercare, have asset management and construction plans that are constantly updating and changing and that these updates and changes should be taken into account by the requiring authorities when the Project is developed further.
- 3.6 To that end, Watercare seeks to be engaged before detailed design and during the ongoing design phases to identify opportunities to enable, or otherwise not preclude, the development of new infrastructure within the Project areas. For example, this could involve the development of an "Infrastructure Integration Plan" prior to detailed design with third party infrastructure providers like Watercare (which can also be updated throughout construction of the Project) to ensure that the Project takes into account and appropriately integrates with potential future infrastructure like wastewater and water services.
- 3.7 It is expected that such an "Infrastructure Integration Plan" could include details of engagement undertaken (including any feedback from infrastructure providers), identify other potential infrastructure that may be developed within the Project areas and how the requiring authorities have enabled or otherwise not precluded the development of such infrastructure within the Project areas.
- 3.8 Watercare supports in depth collaboration and consultation (including information, data sharing and identification of opportunistic works) across infrastructure providers on the development (or redevelopment) of urban environments and wishes to ensure that there is ongoing and timely engagement and collaboration as this Project develops.
- 3.9 As noted, Watercare seeks early engagement from the requiring authorities for future planning and construction works including prior to detailed design and during implementation of construction works. Early and fulsome engagement with Watercare, along with other infrastructure providers, can enable opportunities to plan and future proof the delivery of assets to provide for well-functioning urban environments. For Watercare,

this includes applying for, in a timely manner, "Works Over" Approvals, in compliance with Watercare's "*Water Supply and Wastewater Network Bylaw 2015*" (updated 2021).

- 3.10 In addition, the NoRs interact with existing water and wastewater services. Watercare seeks to ensure the Project does not impact its wastewater and water services in the Project area now and into the future. Watercare wishes to ensure it maintains access to its assets 24 hours a day, 7 days a week for maintenance, safety and efficient operation of its services and that it is consulted on any works undertaken by the requiring authorities that may impact Watercare's services.

#### 4. RECOMMENDATION SOUGHT

4.1 Watercare seeks that Auckland Council recommends:

- (a) amendments to the NoRs, including by way of conditions to ensure any adverse effects on Watercare's assets and operations are avoided, remedied or mitigated and to address the concerns set out above; and
- (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.

4.2 Watercare wishes to be heard in support of this submission.

4.3 If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.



Mark Bourne  
**Chief Operations Officer**  
**Watercare Services Limited**



**FORM 21**

**Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification under Section 168A, 169, 181, 189A, 190 and 195A of the Resource Management Act 1991.**

To: Auckland Council

**Name of submitter:** **Ministry of Education - Te Tāhuhu o te Mātauranga ('the Ministry')**

Address for service: Eden 5, Level 3/12-18  
Normanby Road  
Mount Eden  
Auckland 1011

Attention: Gemma Hayes

Phone: +64 963 80294

Email: [gemma.hayes@education.govt.nz](mailto:gemma.hayes@education.govt.nz)

**This is a submission on the Supporting Growth's Notice of Requirement for Airport to Botany Bus Rapid Transit – Notice of Requirement 4b (NoR 4b) – Alteration to Designation 6717 SH20B – SH20 to Auckland Airport**

This submission relates to the potential road safety effects on students in Puhinui and Manukau from heavy construction traffic.

**Background:**

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Auckland region.

**The Ministry of Education's submission is:**

Under the Resource Management Act 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.

Through its delivery partner, Supporting Growth, Waka Kotahi NZ Transport Agency and Auckland Transport have lodged five Notice of Requirements (NoRs) between Botany and Auckland Airport. The NoRs will collectively enable the construction of a Bus Rapid Transit (BRT) corridor to allow better transportation between Auckland Airport and Botany. The project will also enable stronger walking and cycling facilities. The project aims to respond to poor mode share, access to employment, and increased pressure on transport networks due to residential intensification in the area.

The Ministry broadly supports the project's aim to enable better public and active modes of transportation in South Auckland. However, there are a number of schools around the project corridor that could be affected by the construction of the BRT corridor, as seen in Figure 1. The Ministry seeks for potential heavy construction traffic effects on the safety of schools across the five NoRs to be appropriately addressed and managed. The Ministry's specific concerns are outlined below.

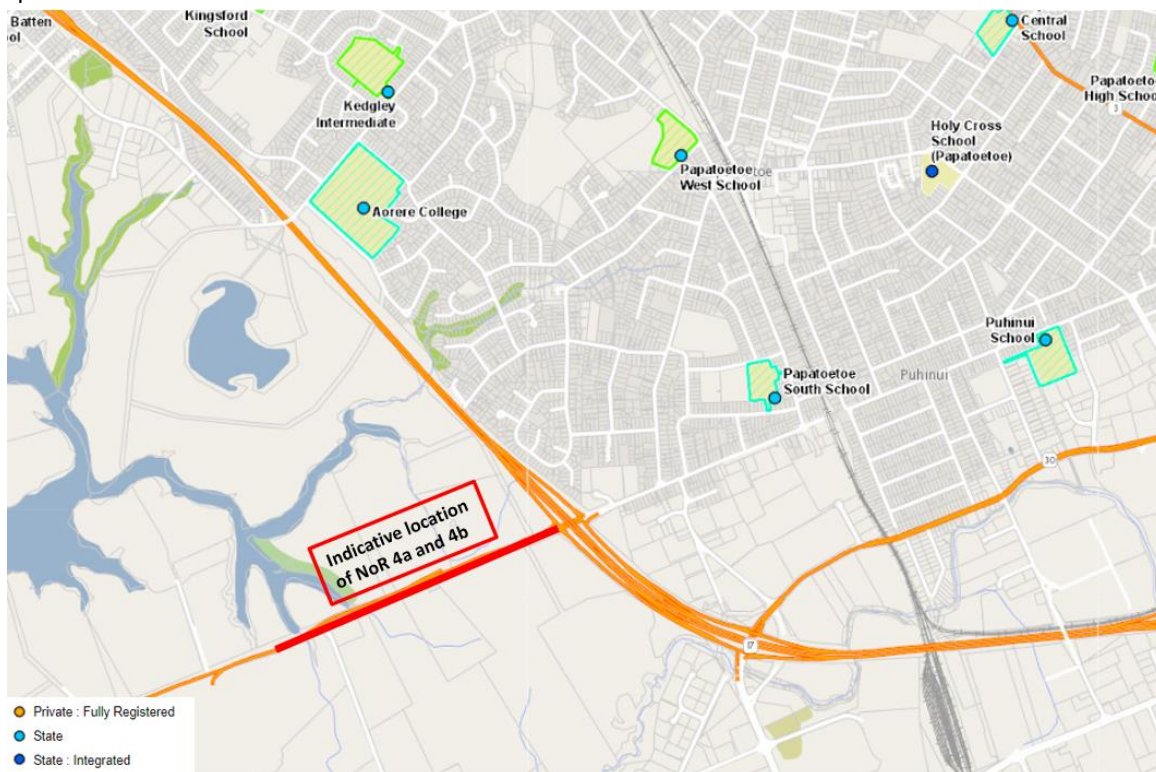


Figure 1: location of schools in relation to NoR 4a and 4b

#### Construction traffic effects:

Supporting Growth has outlined that a Construction Traffic Management Plan (CTMP) will be prepared prior to the start of construction, which will include details on how to manage heavy construction traffic near schools. It will include specific non-working or non-movement hours around schools. Supporting Growth has identified Puhinui School as a school that needs to be considered in the CTMP. No other Ministry schools have been identified.

The Ministry appreciates Supporting Growth's willingness to prioritise student safety during construction. There are a number of other schools besides from Puhinui School that should also be considered in the CTMP. There include Papatoetoe West School and Papatoetoe South School, which are located near the proposed BRT corridor

(NoR4b) and there is the potential for these schools to be affected by heavy construction traffic given they are located on a potential construction traffic route.. The Ministry requests that these schools be included in the CTMP and all heavy construction vehicles must avoid these schools at peak pick-up and drop-off times to maintain a safe environment for students to walk and cycle to school.

The Ministry requests a designation condition outlining the details to be included in the CTMP on how all heavy construction vehicles must avoid schools during pick-up and drop-off times We have proposed a condition below. There is a diverse road network that surrounds the project corridor, resulting in multiple alternative routes around the schools/roads we have proposed to be avoided. Therefore, we do not see the acceptance of this condition to hinder Supporting Growth's construction programme.

### Decision sought

The Ministry is neutral on the Airport to Botany NoRs if Council accepts the following relief and any consequential amendments required to give effect to the matters raised in this submission.

The Ministry requests the following designation conditions:

1. The Construction Traffic Management Plan shall include details on how all heavy construction vehicles must avoid the schools at peak school pick up and drop off times (during term time only) outlined in the table below. It is noted that new schools could establish around the project area before construction commences. Any new school on an identified construction route must be added to the table below. Engagement should be undertaken with the Ministry to confirm the information in the table below is still accurate closer to the time of construction.

Table 1: Schools that heavy construction vehicles must avoid at peak school pick-up and drop-off times

School Name	Address	Associated no travel routes	Times heavy vehicles must avoid the schools (based off each school's individual start and finish times) <sup>1</sup>
NoR 4b			
Puhinui School	116 Puhinui Road, Papatoetoe, Auckland 2104	Puhinui Road (between Clendon Avenue and Great South Road)	8.10am 8.50am 3.00pm to 3.30pm
Papatoetoe West School	1 Hillcrest Road, Papatoetoe, Auckland 2025	Station Road	8.15am to 9.00am 2.45pm to 3.15pm
Papatoetoe South School	58A Milan Road, Papatoetoe, Auckland 202	Kenderdine Road and Milan Road	8.10 – 8.50am 3.00pm to 3.30pm

<sup>1</sup> Typically the morning school drop-off period is longer than the afternoon pick-up period. Which is why on average we have requested a 45min window where trucks must avoid the schools in the morning. The afternoon peak pick-up period is typically shorter with students leaving the school grounds as soon as class finishes, which is why we only request a 30min window (on average) for the afternoon peak.



The Ministry looks forward to working with Supporting Growth to manage construction traffic effects on student safety.

**The Ministry wishes to be heard in support of its submission**

**Gemma Hayes**

**Principal Planning Advisor**

**Ministry of Education**

**Date: 11 April 2023**



**SUBMISSION ON REQUIREMENT FOR ALTERATION OF A DESIGNATION THAT  
IS SUBJECT TO PUBLIC NOTIFICATION UNDER SECTION 181 OF THE  
RESOURCE MANAGEMENT ACT 1991**

**To:** Auckland Council ("**Council**")

**Name:** Auckland International Airport Limited ("**Auckland Airport**")

**Submission on:** Notice of Requirement 4b from Waka Kotahi NZ Transport Agency to alter Designation 6717 to upgrade existing State Highway 20B from the SH20/20B Interchange to Manukau Memorial Gardens for the construction, operation and maintenance of a Bus Rapid Transit corridor, walking and cycling facilities and associated infrastructure ("**NoR 4b**")

### **Introduction**

1. Auckland Airport is New Zealand's largest and busiest airport, with over 21 million passengers at its peak pre-Covid-19 and 20,000 people, across more than 200 businesses, employed in and around the airport.
2. The Airport is a strategic infrastructure asset of local, regional and national importance. As the primary gateway to New Zealand, Auckland Airport is a significant contributor to our regional and national economies.
3. Auckland Airport owns approximately 165 hectares of land within the Puhinui area to the east of the Airport (part of which is subject to Auckland Airport's Designation 1100). Puhinui Road / State Highway 20B provides the only eastern access into the Airport Precinct. As a critical access to the Airport, Auckland Airport has a direct interest in NoR 4b and is concerned to ensure connectivity along this corridor is maintained and enhanced to provide for longer term growth in an efficient manner.
4. Auckland Airport could not gain an advantage in trade competition through this submission.

### **Scope of submission**

5. This submission relates to NoR 4b in its entirety.

### **Nature of submission**

6. Auckland Airport generally supports the works proposed in NoR 4b which seek to upgrade State Highway 20B in order to provide for public transport and active mode corridors, and to provide improved transport choices for users of the eastern access corridor to the Airport. Auckland Airport recognises the importance of providing a wide range of transport options for passengers, customers and staff to get to and from the Airport reliably and safely. Greater provision of public and active modes of transport is central to ensuring sustainable and efficient functioning of the transport network to, from and within the Airport Precinct into the future.

7. Auckland Airport seeks to ensure the works enabled through NoR 4b do not adversely affect, and appropriately integrate with, Auckland Airport's planning and development of the eastern access to the Airport, and surrounding Puhinui area.
8. As part of its long-term masterplanning for the land use and development of the Airport Precinct, Auckland Airport has been actively planning (over many years) improvements to its transport network, including the eastern access to and from the Airport. Auckland Airport recognises any changes to its roading network will have implications for the wider transport system and has been working collaboratively with Auckland Transport and Waka Kotahi NZ Transport Agency in relation to the improvements to the eastern access corridor (including the works proposed in NoR 4b) in order to ensure the roading networks are appropriately integrated.
9. Part of Auckland Airport's landholdings adjacent to Puhinui Road are being developed for a new Park and Ride facility to better service the growing needs of the Airport's customers and employees, and reduce traffic flows through the Airport Precinct. Auckland Airport is also actively planning for the provision of new utilities on its landholdings along the Puhinui Road corridor which are fundamental to Auckland Airport's operations, including fuel pipelines and the electricity intake needed for support the next generation of sustainable aircraft.
10. NoR 4b is proposed to overlap with NoR 4a in order to facilitate the Bus Rapid Transit and recognise timing for construction of the NoRs is likely to coincide. While NoR 4b does not directly impact Auckland Airport's landholdings, given the interrelationship with NoR 4a and the critical access that State Highway 20B provides to the Airport, Auckland Airport is concerned to ensure the works are appropriately integrated with NoR 4a and Auckland Airport's wider development plans.
11. While the parties have worked (and continue to work) closely together, Auckland Airport is concerned NoR 4b (in its current form) does not make adequate provision for, or integrate with, Auckland Airport's (current and future) operational needs.

#### **General reasons for submission**

12. The general reasons for this submission are that NoR 4b (as currently proposed), if granted may not appropriately provide for the necessary integration with the Airport's utilities and operational needs and as such:
  - (a) will not promote the sustainable management of the natural and physical resources in Tāmaki Makaurau, and is therefore contrary to or inconsistent with Part 2 and other provisions of the Resource Management Act 1991;
  - (b) is inconsistent with other relevant planning documents, including the Auckland Unitary Plan;
  - (c) will not meet the reasonably foreseeable needs of future generations;

- (d) will not enable the social, economic and cultural wellbeing of the people of Tāmaki Makaurau; and
- (e) does not avoid, remedy or mitigate actual and potential adverse effects on the environment.

**Specific reasons for submission**

- 13. Without limiting the generality of paragraph 11 above, Auckland Airport opposes NoR 4b on the basis that the works will not adequately integrate with Auckland Airport's future work programmes that are necessary to service the operational needs of the Airport.
- 14. The Airport is also concerned that stormwater infrastructure for the corridor could adversely affect Auckland Airport's land through discharges or otherwise. It is critical that infrastructure required for the NoR is appropriately designed and located so as not to unduly interfere with activities on the Airport's land.
- 15. While the proposed conditions make some provision for network utility operators (including Auckland Airport) with existing infrastructure within the extent of NoR 4b (including draft conditions 6 and 24), the proposed conditions do not:
  - (a) adequately provide for ongoing and future operating needs of the Airport;
  - (b) provide sufficient certainty as to how the works will be integrated with Auckland Airport's own development plans for this corridor; or
  - (c) provide appropriate procedures for ongoing engagement with key stakeholders, such as Auckland Airport.
- 16. Auckland Airport is also concerned to ensure appropriate conditions are included on NoR 4b to avoid, remedy or mitigate adverse effects on Auckland Airport's operations during construction, including effects on traffic and the transport network.

**Recommendation sought**

- 17. Auckland Airport seeks that the Council recommends:
  - (a) amendments to NoR 4b, including by way of conditions to address Auckland Airport's concerns; and
  - (b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out above.
- 18. Auckland Airport wishes to be heard in support of this submission.
- 19. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

**AUCKLAND INTERNATIONAL AIRPORT LIMITED** by its solicitors and  
authorised agents Russell McVeagh:



**Signature:** \_\_\_\_\_  
Allison Arthur-Young

**Date:** 11 April 2023

**Address for Service:** C/- Taylor Mitchell  
  
Russell McVeagh  
Barristers and Solicitors  
Level 30  
Vero Centre  
48 Shortland Street  
PO Box 8/DX CX10085  
**AUCKLAND 1140**

**Telephone:** +64 9 367 8000

**Email:** [taylor.mitchell@russellmcveagh.com](mailto:taylor.mitchell@russellmcveagh.com)

## Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991  
FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to:

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

### **Submitter details**

**Organisation Name (if submission is made on behalf of Organisation)**

Te Ākitai Waiohua Waka Taua Trust

**Address for service of Submitter**

PO Box 59 185  
Mangere Bridge  
Auckland, 2151

Telephone: 021500054

Email: karen.a.wilson@xtra.co.nz

Contact Person: Karen Wilson

**This is a submission on the following notices of requirement:**

Requiring authority	NOR	Description
Waka Kotahi NZ Transport Agency	4b	Alternation to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport
Auckland Transport	4	Bus Rapid Transit – SH20/20B Interchange to Orrs Road
Auckland Transport	3	Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange
Auckland Transport	2	Bus Rapid Transit – Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue)
Auckland Transport	1	Bus Rapid Transit – Botany to Rongomai Park

**The specific parts of the above notice of requirement that my submission relates to are:**

The proposed conditions for NORs 1 to 4a.

**My submission is:**

We are neutral on the notices of requirement.

**The reasons for my views are:**

Te Ākitai Waiohua have lived on these lands since time immemorial. This is our whenua – we have no alternatives. The proposed Bus Rapid Transit will traverse through our rohe and cultural landscape. The scale of the project will have significant adverse effects on the cultural landscape of Te Ākitai Waiohua. As a principal partner to the project, Te Ākitai Waiohua have worked with the project team to develop a set of conditions that will ensure these effects will be appropriately managed as the project is developed.

Te Ākitai Waiohua Waka Taua Trust is neutral on the notices of requirement provided the proposed conditions are retained as requested to ensure ongoing participation in the project.

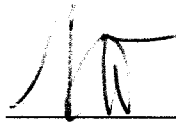
In particular, condition 5 is supported and must be retained because the project will not commence for many years. Condition 5 provides certainty that Te Ākitai Waiohua is recognised as Mana Whenua and as a partner to this project. Governments and people involved in the project will change over the life of a designation and therefore condition 5 is required to ensure there is no ambiguity in the future. Without condition 5 the hard work of those involved in the project over the past few years and the partnership achieved would be at risk.

**I seek the following recommendation or decision from the Council**


Retain Condition 5 to ensure certainty is provided that Te Ākitai Waiohua is Mana Whenua and a partner on this project.

I wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
*(or person authorised to sign on behalf of submitter)*



Date

**SUBMISSION ON NOTICE OF REQUIREMENT 4A – BUS RAPID TRANSIT  
SH20 – 20B INTERCHANGE TO ORRS ROAD AND NOTICE OF REQUIREMENT 4B -  
ALTERATION TO NZ TRANSPORT AGENCY DESIGNATION 6717 STATE HIGHWAY 20B**

**To:** Auckland Council

**And to:** Auckland Transport and Waka Kotahi

**Name of Submitter:** **Altrend Properties Limited**

**Introduction**

1. NoR 4a and NoR 4b promoted by Waka Kotahi and Auckland Transport seek to enable the construction, operation and maintenance for a widening of Puhinui Road between the State Highway 20-20B interchange and Orrs Road, and the alteration of NZTA Designation 6717 on State Highway 20B, to provide for a bus rapid transit corridor, walking and cycling facilities and associated infrastructure.
2. Altrend owns 67 hectares of greenfields industrial land on the southern side of State Highway 20, comprising part of Precinct I432 in the Auckland Unitary Plan. State Highway 20 connects the Precinct with Auckland International Airport to the west and to Manukau City, the wider motorway network, and Botany to the east.
3. Altrend is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

**Submission**

4. Altrend accepts in principle that SH20 is to be widened and acknowledges that proposals have been under discussion for some time. Its principal concerns and conditional opposition relate to:
  - The proposed extent of the road widening.

- The lack of detailed design available to support the extent of the widening.
- The potential effect of the designation and the works on consented stormwater infrastructure.
- The 15 year lapse period uncertainty as to when the works will commence.

### **Extent of widening**

5. Altrend has owned the subject land for 18 years. It was involved with other owners and Auckland Council in developing the Precinct Plan that was adopted by Auckland Council in 2016 as part of the proposed Auckland Unitary Plan process.
6. Altrend's plans had been predicated on a road widening of no more than 40 metres. The proposals subject to the NORs 4a and 4b extend up to 70 metres within the Altrend land.

### **Insufficient supporting information**

7. The information provided to date does not substantiate that a designation of the proposed width is *"reasonably necessary for achieving the objectives of the requiring authority"*. In particular, the lack of a full definition of the *"work"* raises concerns that in breach of the principles of the RMA the requiring authority is covering its options, ahead of properly defining any work that could be subject to analysis under the test imposed by section 171(1)(c) RMA.
8. Altrend is particularly concerned that some of its land may be intended to be used only temporarily during the construction period. That carries a risk that at some time in the future irregular or otherwise unusable severances may be offered, with disputes as to valuation created long after completion of development within the Precinct.
9. Imposition of the NORs and the consequential changes to Altrend's property boundary will inevitably result in changes to the Precinct Plan, requiring a



consequential Plan Change to the AUP. Any changes to the Precinct Plan should be made against the background of certainty of AT/Waka Kotahi's intentions given the possibility that buildout of the Precinct could precede commencement of the proposed works.

### **Stormwater issues**

10. Altrend has developed and has received consent for a system of stormwater ponds which would be affected by the NORs and any subsequent works. The requiring authorities could frustrate implementation of the existing consent. In the event that substitute proposals have to be developed, Altrend is concerned that the requiring authorities could further rely upon the NORs or the subsequent designation in a way that frustrated development of the Precinct.

### **Lapse period**

11. The proposed 15-year lapse period is unacceptable, particularly in the light of the requiring authority's apparent uncertainty as to its proposals. By stylising the requirement as for "*route protection*" the requiring authority is making the landowners responsible for carrying the risks and part of the holding costs for the Auckland Transport and Waka Kotahi project. Subject to achieving greater certainty as to identifying the extent of the work "*reasonably necessary for achieving the objectives of the requiring authority*" Altrend would agree to the standard five-year lapse period for agreed works, subject to any extensions of the period being based on prompt acquisition of the necessary land subject to section 185 of the Resource Management Act 1991.
12. On the basis that until the required land is taken, it is functionally useless to Altrend as owner, full rates relief is sought.

### **Relief sought**

13. Altrend seeks the following relief:
  - Rejection of the notices of requirement; or

- Amendment of the notices of requirement to incorporate a draft outline plan showing the dimensions of the proposed works;
  - Approval by the requiring authorities to a modified stormwater system (if required) and prompt settlement of any injurious affection compensation claim arising;
  - Confirmation that the Altrend land will not be subject to any notices of requirement for temporary construction uses;
  - Imposition of a lapse period of 5 years.
14. Altrend desires to be heard and would welcome the opportunity for further consultation on design and acquisition issues.
15. Altrend seeks undertakings from the requiring authorities as follows:
- To negotiate in good faith for the prompt acquisition of any land approved to be taken for the purposes of providing a widened road corridor;
  - To provide full compensation for costs to the parties of amending the Precinct Plan to accommodate changes arising from the designation;
  - To provide full compensation for costs of redesign of the developments including redesign and relocation of all services.
  - To properly maintain the acquired frontage land pending its end use for road widening purposes.



**R E Bartlett KC**

*Counsel for Altrend Properties Ltd*

**Address for Service:**

R E Bartlett KC  
Shortland Chambers  
Level 13, 70 Shortland Street  
Auckland 1010

PO Box 4338  
Auckland 1140

[bartlett@shortlandchambers.co.nz](mailto:bartlett@shortlandchambers.co.nz)

09 307 9827



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## For Action

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**MEMO TO:** David Wong - Senior Policy Planner

**COPY TO:**

**FROM:** Matt Fletcher - Democracy Advisor

**DATE:** 22 May 2023

**MEETING:** Howick Local Board Meeting of 18/05/2023

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Please note for your action / information the following decision arising from the meeting named above:

**HW/2023/83**                      **Local Board views on Notices of Requirement for the Airport to Botany Bus Rapid Transit Project**

**FILE REF**                      CP2023/05102

**AGENDA ITEM NO.**    21

### **21**    **Local Board views on Notices of Requirement for the Airport to Botany Bus Rapid Transit Project**

**Resolution number HW/2023/83**

**MOVED by Chairperson D Light, seconded by Member B Kendall:**

**That the Howick Local Board:**

- a) provide the following feedback:**
  - i) support the project in principle as a key transport infrastructure project providing links through to the Airport.**
  - ii) acknowledge the feedback from the community.**
  - iii) note with concern the impact on:**
    - A) loss of trees along the corridor including the slip lanes**
    - B) loss of berms**
    - C) access for residents**
  - iv) encourage exploration of options for reducing impact on existing infrastructure**
  - v) note with concern about the long timeframe from the Notice of Requirement through designation through to completion.**
  - vi) request that trees lost are replaced like for like and wherever possible retain trees and / or relocate them to another site in close proximity and explore other options including sale or distribution.**
  - vii) suggest that barriers are provided to protect people who walk and cycle along the residential properties in the area.**

- 
- viii) request that the planners explore the use of Chapel Road as the key walking and cycling infrastructure to support the changes in Te Irirangi drive with respect to the Airport to Botany Bus Rapid Transit Project as an alternative by completing the network along Chapel Road.
  - b) appoint Chairperson Damian Light to speak to the local board views at a hearing on the Notices of Requirement.
  - c) delegate authority to the chairperson of Howick Local Board to make a replacement appointment in the event the local board member appointed in resolution b) is unable to attend the hearing on the Notices of Requirement.

**CARRIED**

Roger Eccles – Policy Planner was in attendance virtually to speak to this item.

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**SPECIFIC ACTIONS REQUIRED:**

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## For Action

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**MEMO TO:** David Wong - Senior Policy Planner

**COPY TO:** John Duguid, Marc Dendale, Richard Davison, Emily Wagon, Carol McGarry, Rina Tagore

**FROM:** Carol McGarry - Democracy Advisor

**DATE:** 17 May 2023

**MEETING:** Ōtara-Papatoetoe Local Board Meeting of 16/05/2023

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Please note for your action / information the following decision arising from the meeting named above:

**OP/2023/69**                      **Local Board views on Notices of Requirement for the Airport to Botany Bus Rapid Transit Project**

**FILE REF**                        CP2023/05126

**AGENDA ITEM NO.**    14

### 14 **Local Board views on Notices of Requirement for the Airport to Botany Bus Rapid Transit Project**

Resolution number OP/2023/69

MOVED by Chairperson AR Autagavaia, seconded by Member V Hausia:

**That the Ōtara-Papatoetoe Local Board:**

- a) **provide local board views on the Notices of Requirement for the Airport to Botany Bus Rapid Transit Project, being an alteration to Designation 6717 and four new designations as follows:**
  - i) **the board support moves for developing public transport connections and facilitating rapid, frequent, and reliable transport services in Auckland, especially in the south where students and workers are heavily reliant on these services**
  - ii) **support Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan and the aim of reaching net zero emissions by 2050**
  - iii) **seek full consideration of the specific impact on local communities of Ōtara-Papatoetoe as the Airport to Botany Bus Rapid Transit project is developed, designed and delivered**
  - iv) **the Notices of Requirement/designation restricts council's use of developing the designated land area under s176 of the Resource Management Act (RMA). Until such time that the designation is given effect to, preference would be for a 'blanket permission' provided by a condition to enable parks to be developed to meet the needs of the community, without restriction**
  - v) **ten to 15 years is a long period for the designation and restrictions and this will affect several property owners, noting**

that funding for implementing the rapid transit project is not in place at present. The board is concerned for property owners faced with the uncertainty on compensation over a long period of time

- vi) future proofing local neighbourhoods and catchment areas that are affected as a result of the Notices of Requirement is essential. It will have a bearing on how families and communities use and access areas for day-to-day life. For example, construction of an arterial road may make it hard for people to attend a sports club
- vii) access to active recreation parks in the Ōtara-Papatoetoe area is important for local communities. In the past five years the area has had 80 per cent high density housing. Access to green, open spaces is limited in the local area. The Manukau Sports Bowl, Hayman Park and Rongomai Park are reserves of high use. These also serve as venues for regional and subregional events and gatherings. Puhinui Domain is another green area that will be affected through the Notices of Requirement. Access to the parks during construction should be assured/guaranteed. The board would like to know that if this does not occur, what mitigation or compensation will be offered. A construction traffic management plan (CTMP), only seeks to manage effects and does not guarantee access if not practicable
- viii) request that quicker access routes to Auckland International Airport and other major destinations is considered, such as a direct road connection between Diorella drive to Puhinui Station and through to the airport, by bypassing Manukau Bus and Train Station for quicker road access to the airport
- ix) request timely consultation with council and the local board in the project planning stage to inform use, and therefore better manage impacts on open spaces. Local boards should be noted as a stakeholder in the Stakeholder Communication and Engagement Management Plan (SCEMP)
- x) that planning and assessments for the Airport to Botany Rapid Transport project must give priority to the Transform Manukau projects planned or being implemented in the local board area
- xi) that the masterplan for the Manukau Sports Bowl has been adopted by the local board and the Airport to Botany project must identify alternative locations for the storm water ponds considering the masterplan, public access, design aesthetics and potential future residential housing in the vicinity
- xii) that the Hayman Park playground transformation and expansion project is taken into full consideration and not compromised. The designations for the Airport to Botany project will reduce access to open spaces for informal and formal recreation at a time when significant residential growth is predicted in the area. Ensuring planned completion and access to Hayman Park is critical for local communities
- xiii) be informed if there are any opportunities arising to optimize sites along the route, especially around proposed stations/stops

**Notice of Requirement 1: Bus Rapid Transit - Botany to Rongomai Park**



- xiv) **tuhi ā-taipitopito /note that impact on property reflects the highest percentage of feedback for this section of the project at about 45%**
- xv) **tuhi ā-taipitopito /note that access is an important concern from the public, for Notice of Requirement 1, with the third highest percentage (12%) of submissions. Access to Rongomai Park is of serious concern to the Ōtara-Papatoetoe Local Board, noting that this is a very busy and well used park by clubs and the public. It has only one access, on Te Irirangi Drive. Access to Rongomai Park must be assured by Auckland Transport.**
- xvi) **tuhi ā-taipitopito /note that there is a footbridge that crosses Te Irirangi Drive from Rongomai Park to residential housing on the other side of Te Irirangi Drive. The Ōtara-Papatoetoe Local Board is concerned about pedestrian access across the proposed roadworks from residential housing to the park and also to access the nearby High School**

**Notice of Requirement 2: Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue)**

- xvii) **tuhi ā-taipitopito /note that impact on property is a significant concern for the public with 36 per cent of submissions on this section of the project. Residents are concerned about the impact on property values and their inability to develop their land. Those property owners that will have only part of their section purchased by Auckland Transport are concerned that it could leave them in a worse position, with a reduced section and impacted property value**
- xviii) **tuhi ā-taipitopito /note a concern that while the Manukau Sports Bowl has an alternative entrance to allow access to the park during the construction phase of this project, the land required by Auckland Transport will require significant reconfiguration of the current roadways and access to sections of the park**
- xix) **tuhi ā-taipitopito /note serious concern that the proposed area for placing stormwater ponds on the Manukau Sports Bowl will lead to significant loss of park space, and severely impact the approved masterplan for the park. The local board has only recently completed several rounds of public consultation and approved the master plan in February 2023. The proposed stormwater ponds will take over the current playground, and future plans for enhanced bike play. The Manukau Sports Bowl serves as a venue for many large events and festivals, both local and regional, such as PolyFest and Movies in Parks. There are other wetland areas on the Manukau Sports Bowl that Auckland Transport should look at using, to minimise the impact of this project on the park and the users**
- xx) **tuhi ā-taipitopito /note that stage 2 of the destination playground at Hayman Park (part of Transform Manukau managed by Eke Panuku) is a major project for the local board. The project is currently constructing stage 2 of the playground at Hayman Park. Stage 1 included a Kiosk building with toilets. The proposed designated area appears to either cross over to the current and to be built on in the future playground sites, or very near to the**

playground and Kiosk. It would be a waste of ratepayers money should council be digging up newly built playground facilities

- xxi) tuhi ā-taipitopito /note serious concerns on the loss of valuable informal recreational space for communities due to the impact on proposed designation to the Puhinui Domain. This park acts as a green buffer between residential and business areas and significant growth is foreseen around the area. Important planning references and local board priorities on the Local Play Network Gap Analysis must be included in the assessment of the Notice of Requirement 2. Although the park needs more development compared to the parks mentioned above, it is a significant green space in an industrial area bordering on residential. The area is earmarked for intensification, and therefore retention of green space in Manukau and Wiri is paramount. Any storm water ponds at the Puhinui Domain must enhance the area and provide residents access to this green space
- xxii) tuhi ā-taipitopito / note that a significant number of housing will be lost on this section of the project. It appears to the board that, because Auckland Transport has to purchase entire properties in many circumstances, there is going to be a lot of unused land. The board believes this could be an opportunity for Auckland Transport to create green spaces that enhances environmental impacts along the route. This suggestion is also due to the local board area having the second lowest tree canopy cover in Auckland
- xxiii) tuhi ā-taipitopito / note that the second highest percentage (19%) of submissions were on concerns about access. There are at least three schools along or near the route that will be impacted by this project. For this section of Notice of Requirement 2 namely Puhinui School and Redoubt North Primary. Puhinui School will have very real issues with access, as the main gate is on Puhinui Road, with an already congested secondary gate on a side road, only metres away from Puhinui Road. Papatoetoe West also has a school entrance only metres away from the proposed road works. Auckland Transport must provide safe alternative access to these schools for students, staff and families

**Notice of Requirement 3: Bus Rapid Transit – Puhinui Station (in the vicinity of Plunket Avenue) to SH20/20B Interchange**

- xxiv) tuhi ā-taipitopito / note that impact on property is a significant area of concern from the public (35% of submissions) for this section of the project. Residents are concerned about the impact on property values and inability to develop their land. Those property owners that will have only part of their section purchased by Auckland Transport, are concerned that it will leave them in a worse position, with a reduced section and impacted property value
- xxv) tuhi ā-taipitopito / note that a significant number of housing will be lost on this section of the project. It appears to the board that, because Auckland Transport has to purchase entire properties in many circumstances, there is going to be a lot of unused land. The board believes this could be an opportunity for Auckland

Transport to create green spaces that enhances the environmental impacts along the route

- xxvi) tuhi ā-taipitopito / note that the second highest percentage of submissions were on access, at 23%. Papatoetoe West School has two entrances only metres away from the proposed project. Auckland Transport must provide safe alternative access to these schools for students, staff and families
- xxvii) tuhi ā-taipitopito / note that the Notice of Requirement 3 area is already a congested area, with many years of roadworks and road reconfiguration. The flow-on effect of traffic disruption will be felt across Papatoetoe and Wiri. Alternative routes and traffic planning must be in place and well communicated to road users

**Notice of Requirement 4a: Bus Rapid Transit - SH20/20B Interchange to Orrs Road**

- xxviii) tuhi ā-taipitopito / note that the highest percentage of feedback (28 %) from public for this section of the project is about impact on property
- xxix) tuhi ā-taipitopito / note that the second highest area of concern from the public is about access, 27 per cent submissions. Access to Puhinui Reserve and Colin Dale Park, is currently only along Prices Road. The Manukau Memorial Gardens can only be accessed along SH20B via private vehicle or walking/bikeway. Access to all these public sites must be assured by Auckland Transport

**Notice of Requirement 4b: Alteration to Designation 6717 State Highway 20B – State Highway 20 to Auckland International Airport**

- xxx) tuhi ā-taipitopito / note that 40 per cent of submissions from public were concerns about impact on property, followed by concerns on access at 24 per cent
- b) kopou / appoint Chair Apulu Reece Autagavaia to speak to the local board views at a hearing on the Notices of Requirement
- c) tautapa / delegate authority to the chairperson to make a replacement appointment in the event the local board member appointed in resolution b) is unable to attend the hearing on the Notices of Requirement
- d) whakamihi / thank the A2B officers for early updates to the board on the planning/ route ideas
- e) tono / request the resolutions be circulated to Howick, Manurewa and Māngere-Ōtāhuhu Local Boards.

**CARRIED**

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**SPECIFIC ACTIONS REQUIRED:**

Note: Democracy Advisor has forwarded this meeting action to: Yu Ning (Eke Panuku), James Hendra, Renta Smit and Jennifer Fraser (Auckland Transport) for their information and will action resolution e).



**From:** [David Wong](#)  
**To:** [mackiet@xtra.co.nz](mailto:mackiet@xtra.co.nz)  
**Subject:** FW: Māngere-Ōtāhuhu Local Board Meeting of 17/05/2023 - Action Memo  
**Date:** Monday, 22 May 2023 12:24:32 pm

---

Hi Trevor,

Below are the views from the Māngere-Ōtāhuhu Local Board.

Regards  
David

**David Wong | Senior Policy Planner, Planning Central/South  
Plans and Places**

Mobile 021 897 523

Auckland Council, Level 24, 135 Albert Street, Auckland

Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

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**From:** Jacqui Robinson <[jacqui.robinson@aucklandcouncil.govt.nz](mailto:jacqui.robinson@aucklandcouncil.govt.nz)>  
**Sent:** Friday, 19 May 2023 4:34 pm  
**To:** David Wong <[David.Wong@aucklandcouncil.govt.nz](mailto:David.Wong@aucklandcouncil.govt.nz)>  
**Cc:** John Duguid <[John.Duguid@aucklandcouncil.govt.nz](mailto:John.Duguid@aucklandcouncil.govt.nz)>; Daniel Poe <[Daniel.Poe@aucklandcouncil.govt.nz](mailto:Daniel.Poe@aucklandcouncil.govt.nz)>; Nicole Braganza <[Nicole.Braganza@aucklandcouncil.govt.nz](mailto:Nicole.Braganza@aucklandcouncil.govt.nz)>  
**Subject:** Māngere-Ōtāhuhu Local Board Meeting of 17/05/2023 - Action Memo

## For Action

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**MEMO TO:** David Wong - Senior Policy Planner

**COPY TO:** John Duguid, Daniel Poe, Nicole Braganza, Manoj Ragupathy

**FROM:** Jacqueline Robinson - Democracy Advisor

**DATE:** 19 May 2023

**MEETING:** Māngere-Ōtāhuhu Local Board Meeting of 17/05/2023

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Please note for your action / information the following decision arising from the meeting named above:

<b>MO/2023/53</b>	<b>Local Board views on Notices of Requirement for the Airport to Botany Bus Rapid Transit Project</b>
<b>FILE REF</b>	CP2023/05132
<b>AGENDA ITEM NO.</b>	16

**16 Local Board views on Notices of Requirement for the Airport to Botany Bus Rapid Transit Project**

Resolution number MO/2023/53

MOVED by Chairperson N Bakulich, seconded by Member P Peo:

**That the Māngere-Ōtāhuhu Local Board:**

- a) **acknowledge that the majority of the area covered by the Notices of Requirement for the Airport to Botany Bus Rapid Transit Project are not within the Māngere-Ōtāhuhu Local Board boundary**
- b) **tautoko / supports the views of the Otara-Papatoetoe Local Board and shares the concerns highlighted in that board's submissions where it affects property values, construction disruption including construction noise and vibration effects, concerns about access, impacts on parking, and effects of stormwater and flooding risk**
- c) **tuhi ā-taipitopito / note that the improvements will help connect the Māngere-Ōtāhuhu's transport projects including the cycling network, and provide more choices for communities to travel to the airport and Māngere-Ōtāhuhu's business areas**
- d) **tautoko / support road designs and water catchment infrastructure to mitigate any negative consequences to the local Puhinui Craters, Colin Dale Reserve, Manukau Harbour and the wider ecological system to ensure these sensitive areas are protected**
- e) **tuhi ā-taipitopito / note that currently, the Puhinui Road airport area is only coping with the traffic congestion at peak times. The local board request the construction phase is managed, to avoid traffic congestion adversely impacting the Māngere-Ōtāhuhu roads near the airport.**

**CARRIED**

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**SPECIFIC ACTIONS REQUIRED:**

Ngā mihi | Kind regards,

Jacqueline Robinson (she) | Democracy Advisor  
Te Poari ā-Rohe o Māngere-Ōtāhuhu | Māngere-Ōtāhuhu Local Board  
Waea pūkoro 09 256 5133 | Phone 027 301 4420  
Te Kaunihera o Tāmaki Makaurau | Auckland Council  
aucklandcouncil.govt.nz

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# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name) Huong Thi Nguyen and Van Dung Nguyen

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

83 Te Irirangi drive Clover Park Manukau

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

**This is a submission on a notice of requirement:**

<b>By:</b> Name of Requiring Authority	<input type="text"/>
<b>For:</b> A new designation or alteration to an existing designation	<input type="text"/>

**The specific parts of the above notice of requirement that my submission relates to are: (give details):**

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**My submission is:**

I or we support of the Notice of Requirement  I or we oppose to the Notice of Requirement   
I or we are neutral to the Notice of Requirement

**The reasons for my views are:**

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(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

Empty lines for providing details of the recommendation or decision.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Handwritten signature of the submitter.

27/04/2023

Signature of Submitter

Date

(or person authorised to sign on behalf of submitter)

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

You must serve a copy of your submission on the person who gave the notice of requirement as soon as reasonably practicable after you have served your submission on the Council (unless the Council itself, as requiring authority, gave the notice of requirement)

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.

## **Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

# Submission on a requirement for a designation or an alteration to a designation subject to full or limited notification

Sections 168A, 169, 181, 189A, 190, and 195A of the Resource Management Act 1991



FORM 21

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

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

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Mrs Meleane Latu

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

C/- Hayden Law Ltd, 24 St Heliers Place, Pāpāmoa, Tauranga 3118

Telephone:  Fax/Email:

Contact Person: (Name and designation if applicable)

### This is a submission on a notice of requirement:

By:: Name of Requiring Authority

Auckland Transport

For: A new designation or alteration to an existing designation

Notice of Requirement: Rongomai Park to Puhinui Station (in the vicinity of Plunket Avenue)

### The specific parts of the above notice of requirement that my submission relates to are: (give details):

47 Te Irirangi Road, Clover Park, Auckland - building of wider road

### My submission is:

I or we support of the Notice of Requirement

I or we oppose to the Notice of Requirement

I or we are neutral to the Notice of Requirement

### The reasons for my views are:

I own the property and do not wish to sell it or a any part of it as it was owned by my parents.

There is already a wide road of 5 lanes.

My son and his young family wish to move into the property and building a road will diminish the area for the use of the property for my son's family and increase the risk entering and exiting

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the property.

(continue on a separate sheet if necessary)

I seek the following recommendation or decision from the Council (give precise details including the general nature of any conditions sought).

Decline the designation.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
(or person authorised to sign on behalf of submitter)

05 July 2023

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

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If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- (a) Adversely affects the environment, and
- (b) Does not relate to trade competition or the effects of trade competition.