



Submission for East West Link proposal

Instructions for submitters

Please complete all sections of this form and submit it along with any additional information to the Environmental Protection Authority (EPA) no later than **5pm on Wednesday, 22 March 2017**. If you choose to submit a hard copy of this form, you must also forward a copy to the applicant.

Personal Information

1. Submitter(s) Details

First name:	Celia		
Surname:	Davison		
Organisation (if applicable):	AUCKLAND COUNCIL		
Email address for service:	celia.davison@aucklandcouncil.govt.nz		
Telephone number(s):	09 301 0101	Mobile	021 246 9825
Postal address for service:	Level 23, 135 Albert Street, Auckland Central, AUCKLAND 1010		

Please note, if you have provided your email address we will use this as your address to contact you.

Submission

2. What are you submitting on?

Proposal name: East West Link ("EWL proposal")
This submission relates to: The whole proposal <input checked="" type="checkbox"/> or Specific parts of the proposal: <input type="checkbox"/>
List the parts of the proposal from the public notice (if applicable) you wish to make a submission on:

3. What is your view on the proposal or the specific parts listed above?

Please select one:				
If you are wanting to submit on specific parts of the proposal, please clearly identify these in the box below				
Fully support <input type="checkbox"/>	Partially support <input checked="" type="checkbox"/>	Neutral <input type="checkbox"/>	Partially oppose <input type="checkbox"/>	Fully oppose <input type="checkbox"/>

East West Link Submission Form

Please tell us the reasons for your view.

(If you require additional space, please attach further pages clearly labelled with your name.)

Please see attachment.

4. What decision would you like the Board of Inquiry to make?

I seek the following decision on the proposal or specific parts of it (please select one)

Approve the proposal

Approve the proposal with
conditions

No view

Decline the proposal

Please list any conditions (for example terms, standards, restrictions and prohibitions etc) you are seeking in the box below.

(If you require additional space, please attach additional pages that are clearly labelled.)

Please see attachment.

5. Would you like to present your views on this submission to a Board of Inquiry at a public hearing?

Please select one:

I want to present my views at a public hearing.

I do not want to present my views at a public hearing.

Tick here if you would like to present a joint case at the hearing with others with a similar submission .

6. Are you a trade competitor?

I am not a trade competitor.

I am a trade competitor.

If you are a trade competitor, please contact the EPA to discuss your submission prior to submitting as your right to make a submission may be limited. If you are a trade competitor, please answer the question below.

East West Link Submission Form

Trade competitors: please select the situation applicable to you.

<input type="checkbox"/> I am	<input type="checkbox"/> I am not
directly affected by an effect of the subject matter of the submission that –	
(a) adversely affects the environment; and	
(b) does not relate to the trade competition or the effects of trade competition.	

7. Your signature, or signature of person authorised to act on your behalf

Signature

Date

Please note that a signature is not required if you make your submission by electronic means.

Privacy statement

All of the personal information you provide on this form will be held by the EPA, 215 Lambton Quay, Wellington. It will be used by the EPA for the purpose of administering the proposal referred to in your submission. This includes providing a full copy of your entire submission (including name, address, phone number and email address) to the Board of Inquiry and the applicant. Your submission may also be provided to other parties directly involved in the Board of Inquiry process. Your personal information will not be published on the EPA, or any other, website. By completing this submission form, you give the EPA permission to use the information for the purpose stated above. You have the right to access and correct personal information held by the EPA.

The information supplied in your submission will be released by the EPA under the Official Information Act 1982 (OIA) if a request for the information is made to us in the future. If you do not wish for your information to be released under the OIA, you must indicate that in your submission to us. You must indicate which parts of your submission you do not wish to be released and the reasons why the release of that information would be likely to adversely affect you.

Where to send your submission

Your submission must be **received** by the EPA **before 5.00 pm, Wednesday, 22 March 2017**, and a copy must also be sent to the applicant.

 East West Link Submission Form

Using the [online tool](http://www.epa.govt.nz/eastwestsubmit) (www.epa.govt.nz/eastwestsubmit) is the preferred way to make a submission. When you use this tool, you will be emailed a copy of your submission, and a copy will be sent to the applicant automatically.

If you cannot use our online form, please post or email a copy to the EPA and to the applicant.

EPA contact details	Applicant contact details
eastwest@epa.govt.nz	eastwest@nzta.govt.nz
Please include 'Submission: (your name), EWL proposal' in the subject line.	Please include 'Submission: (your name), EWL proposal' in the subject line.
Attention: East West Link Proposal Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140.	Attention: Scott Wickman New Zealand Transport Agency, East West Link Alliance, Private Bag 106602, Auckland 1143.

1.0 General comments on the Submission:

- 1.1. This is the Council's submission on the East West Link Applications (the **Proposal**) by the New Zealand Transport Authority (**NZTA**) to the Environmental Protection Authority (**EPA**).
- 1.2. For the purposes of this submission, the 'Council' comprises the Auckland Council, Panuku Development Auckland, Watercare Services Ltd, the Maungakiekie-Tāmaki Local Board, the Māngere-Ōtāhuhu Local Board and the Puketāpapa Local Board.
- 1.3. The Council welcomes the opportunity to comment on NZTA's notices of requirement and resource consents for the East West Link project (**EWL**). The Auckland Council recognises its position as a submitter rather than as the consenting authority in a national consenting process.
- 1.4. The proposal by NZTA includes two Notices of Requirement and 23 resource consent applications to construct and operate the proposed EWL route.
- 1.5. A large volume of information was supplied with these applications which included an Assessment of Environmental Effects (**AEE**), technical drawings, cross-sectional drawings, an Urban and Landscape Design Framework and several technical reports.
- 1.6. The Auckland Council is the local government council for the Auckland Region in New Zealand. The governing body consists of a mayor and 20 councillors, elected from 13 wards. There are also 149 members of 21 local boards who make decisions on matters local to their communities.
- 1.7. Panuku Development Auckland (**Panuku**) is a Council Controlled Organisation of Auckland Council. It was established on 1 September 2015 as the Auckland Council's lead urban regeneration agency. Panuku is leading regeneration in a number of Auckland Council agreed priority locations which are identified as either 'support, unlock or transform' projects. Onehunga has been confirmed as a 'transform' project due to the scale and impact of regeneration opportunities, requiring the highest degree of resource and finance allocation. The redevelopment of the Port of Onehunga, when this land is no longer required for construction works, is identified as a key project for the successful regeneration of Onehunga. In consultation with the Auckland Council and other stakeholders Panuku has developed a High Level Project Plan (**HLPP**) for the Onehunga area. The HLPP sets out the development objectives for the Onehunga area. Auckland Council Planning Committee approval of the HLPP will provide the mandate to progress with detailed communications/engagement, framework planning and the development realisation processes within Onehunga.
- 1.8. Watercare Services Limited (**Watercare**) provides water and wastewater services to the people and businesses of Auckland. The company is a council-controlled organisation, wholly owned by Auckland Council. It funds all of its activities itself, receives no funding from the Auckland Council or central government and is prohibited by statute from paying a dividend to the Auckland Council. Watercare draws water from multiple sources, treats it to a high standard and delivers it to homes and businesses via a vast network of pipes. It also collects, treats and disposes of wastewater, including trade waste from industry. Within the area previously governed by Auckland City Council, the company is responsible for the combined wastewater and stormwater system. Watercare is also focused on the future needs of the region. It plans, constructs and delivers new water and wastewater infrastructure in a cost-efficient manner.
- 1.9. Local boards are a key part of Auckland Council's governance, representing and making decisions for local communities. The EWL will affect communities within the boundaries of the Maungakiekie-Tāmaki Local Board and the Māngere-Ōtāhuhu Local Board areas and, as such, both boards have expressed views which are incorporated within the Council submission. The comments of the Puketāpapa Local Board, which is affected by transmission lines which extend across the project area, are also incorporated within the Council submission.
- 1.10. The NZTA has presented on the EWL Project to the Auckland Urban Design Panel on a number of occasions, most recently on 6 March 2017. The Auckland Urban Design Panel provides independent design review of significant projects, for both private and public developments. The Panel's primary

 East West Link Submission Form

purpose is to assist in achieving a high standard of design quality by reviewing projects and identifying areas for improvement early on in the design process, prior to their lodgement for planning approval. The Auckland Urban Design Panel made recommendations and provided these to the NZTA on 7 March 2017. A copy of these recommendations is attached to this submission.

- 1.11. Auckland Transport (**AT**) has made a separate submission on the proposal. However, as part of the review of the application, the Council has held regular discussions with AT and each organisation is aware of their respective positions on the proposal.
- 1.12. The Council has considered the proposal in detail. The nature and complexity of the proposal is acknowledged and the submission reflects the range and significance of the issues at stake.
- 1.13. The Auckland Plan identifies the EWL as a top regional transport priority and the Council supports the proposal in principle, recognising the long term positive effects of the proposal, in particular the reduction of traffic congestion and travel times, the improvement for freight movements, some improved connectivity for pedestrians and cyclists and the enhanced quality of stormwater discharges into the Mangere Inlet.
- 1.14. While the Council acknowledges the benefits of the proposal, it has various concerns in relation to a number of aspects of the proposal, in particular the impact on geological features within the area (Te Hopua Tuff Ring and Anns Creek), the overall effect on the marine environment and ecological areas, the proposal to dredge the inlet, the size and nature of the reclamation proposed and the proposal's potential to sever the Onehunga Town Centre from the Onehunga Port area and undermine future planned development in this location. These are discussed in detail below and the Council seeks that the proposal and conditions be modified to address these concerns.
- 1.15. The Council wishes the Board of Inquiry to note that the presence of transmission lines around the Neilson Street Interchange is mentioned in a number of places within its submission by experts considering appropriate mitigation for community severance, the loss of recreation space, and likely effects on the Te Hopua Tuff Ring. It is the Council's view that undergrounding (or removing) the lines would therefore assist in reducing the adverse effects of the EWL. The Council's preferred outcome would be undergrounding (or removal) of the lines as part of the EWL. The Council appreciates the potential limits on the Board of Inquiry's ability to require this outcome. Accordingly, and without prejudice to its preferred outcome, the Council seeks that the NZTA use all reasonable endeavours to have the lines undergrounded (or removed) as part of the EWL works, including:
- Undertaking a feasibility study, in consultation with Transpower, to demonstrate how the lines can be undergrounded; and
 - Designing the EWL works (including timing of construction) so as to facilitate (or not make more difficult) the undergrounding of the lines.
- 1.16. The Council has identified an issue with the coastline boundaries as shown in the application. These are inconsistent with the Council's mapped indicative coastline. The Council seeks to ensure that this issue is investigated and resolved before the proposal is finalised.
- 1.17. The Council strongly considers that the NZTA should be required to provide full mitigation to minimise adverse effects. Mitigation can be addressed through conditions of the notices of requirement and resource consents. It is noted that Council experts have been provided with the opportunity by the NZTA to have direct input on the development of the draft conditions leading up to notification of the proposal. Where adverse effects can not be adequately mitigated, the project should include off-sets or additional benefits to outweigh the adverse effects.
- 1.18. The Council seeks that any assets that may be vested in the Council comply with Council standards and that its specialists are involved in any detailed design where appropriate. However, until agreement has been reached, there should also be no presumption that any proposed assets being delivered by NZTA will be vested in the Council on completion of the project.

 East West Link Submission Form

- 1.19. The Council wishes to ensure that the detailed design of the project does not prevent or foreclose any future development of the Port of Onehunga, such as being planned by Panuku, and its associated benefits.
- 1.20. Long-term ownership and legal interests in any land to be reclaimed (other than the land for the EWL itself to be vested in the Crown for road) will be determined through the process set out in the Marine and Coastal Area (Takutai Moana) Act 2011. The Council acknowledges that the Manakau Harbour is subject to a Treaty of Waitangi claim and draws the attention of the Board of Inquiry to that fact. In order to address adverse cultural effects, and respond to matters relevant to Part 2 of the Resource Management Act 1991 (**RMA**), there may be opportunities for the land to be co-managed with Mana Whenua, which is in principle supported by the Council.
- 1.21. The Council sought the views of all 19 Mana Whenua entities in the Auckland Region at operational and governance levels including those that are directly affected by this proposal. In taking this wide engagement approach the Council acknowledged that the Proposal, as a road of national significance, is also regionally significant.

The Council acknowledges Mana Whenua entities who have signalled their specific interest as being affected at this location and within the Maungakiekie-Tāmaki Local Board Area in addition to the 10 Mana Whenua entities (indicated by an “*” below) which are identified by the NZTA as Project Partners in the NZTA *Assessment of Effects on the Environment Part E - Engagement* (p167). The Council engagement was inclusive of all of these Mana Whenua entities.

The Council initially engaged with Mana Whenua at the operational or kaitiaki level working through key components of the EWL Proposal. Mana Whenua responses were then collated with the provision for Mana Whenua to review the records. The Council then undertook engagement with Mana Whenua at the Governance level to review and confirm the Mana Whenua responses received. Hui representation at the operational and governance level was determined by those Mana Whenua entities who elected to attend.

The Mana Whenua entities engaged with by the Council to which all invitations and relevant material, including detailed hui records and draft Mana Whenua responses were sent, included representation for the iwi listed below:

- Ngātiwai
- Ngāti Manuhiri
- Ngāti Rehua
- Te Rūnanga o Ngāti Whātua*
- Te Uri o Hau
- Ngāti Whātua o Kaipara
- Ngāti Whātua Ōrākei*
- Te Kawerau ā Maki*
- Te Ahiwaru*
- Te Ākitai Waiohua*
- Ngāti Tamaoho*
- Ngāti Te Ata Waiohua*
- Ngāi Tai ki Tāmaki*
- Waikato - Tainui
- Ngāti Paoa*
- Ngāti Maru*
- Te Patukirikiri

- Ngaati Whanaunga
- Ngāti Tamaterā

- 1.22. The Council seeks the ability to consider the general workability of conditions with respect to Council processes to ensure efficient sign-off.
- 1.23. In all cases where relief is sought within this submission, the Council would also be prepared to consider, and agree to, any such other relief required to address the matters raised within that section of the submission.
- 1.24. The Council wishes to present evidence in support of this submission. Evidence may also be provided by Panuku, Watercare, the Maungakiekie-Tāmaki Local Board, the Māngere-Ōtāhuhu Local Board and the Puketāpapa Local Board.
- 1.25. In providing these submission points, the Council recognises the complex and interwoven nature of many of the issues related to the proposal. The issues cannot be considered in isolation to each other – for example, the proposal to construct the stormwater treatment areas in the coastal marine area has significant impact on the general marine ecology and coastal processes within the coastal marine area. The overlapping nature of issues means that some comments may be repeated in the discussion below. All comments should be read in the context of the overall submission.
- 1.26. The following section contains the contents of the Council’s submission. Each section contains the key issues of concern and the relief sought in the following areas:

Section 2 - Traffic and Transport

Section 3 - Economics

Section 4 - Landscape and Urban Form / Built Environment

Section 5 - Coastal Processes

Section 6 - Ecology

Section 7 - Stormwater

Section 8 - Closed Landfills

Section 9 - Arboriculture

Section 10 - Built Heritage

Section 11 - Historic Heritage

Section 12 - Outstanding Natural Heritage

Section 13 - Noise

Section 14 - Social Impact

Section 15 - Air Quality

Section 16 - Parks and Open Space

Section 17 - Watercare Infrastructure

Section 18 - Local Board Views - the Māngere-Ōtāhuhu Local Board, the Maungakiekie-Tāmaki Local Board and the Puketāpapa Local Board

Section 19 – Auckland Urban Design Panel Recommendations

2.0 Traffic & Transport

2.1 General

The project outcomes seek to improve the connectivity between SH1, SH20, and the Onehunga-Penrose industrial areas, improve the journey time reliability for buses between the town centre and SH20 and improve safety and accessibility for walking and cycling. The Council supports these outcomes which are well aligned with its own strategic direction, and considers that the scheme will make a strong contribution to achieving those outcomes.

2.2 Road Network Capacity

Some areas of the application contain insufficient information to adequately assess effects on the local road network as a result of the proposal, and whether relief is sought to mitigate these effects. In particular, the following areas require further Council assessment:

- Onehunga Harbour Road and connecting network to Galway Road including capacity and queuing space.
- Hugo Johnston Drive / EWL and Great South Road / EWL intersections and restricted movements requiring local diversion route
- Princes Street overbridge and intersections

The Council seeks access to detailed outputs to allow assessment of effects, encompassing demand flows, average speeds on links and intersection delays, and the modelling of public transport journey times. The EWL passes through the Panuku Onehunga Transform Area. Auckland Council proposes the urban regeneration of this area including land uses changes at the Onehunga Wharf. The Council supports the journey time benefits that the EWL aims to deliver, but seeks additional evidence to be able to ascertain the degree of residual capacity which would remain on the EWL, and the surrounding local road network, including Galway Street and Onehunga Harbour Road, should land use or network changes affect future demand around Onehunga.

Relief Sought

- a. The Council seeks access to the transport modelling undertaken to assess the scheme, including details of peer review and input assumptions to the transport models.
- b. The Council requests evidence of sensitivity testing of the Onehunga area to demonstrate there is adequate network capacity to account for reasonable uncertainty and future growth aspirations for the Panuku Transform Onehunga project area.
- c. Provision of satisfactory evidence to demonstrate the efficiency and safety of the local road network will not be compromised as a result of the project.

2.3 Connectivity and Alignment

2.3.1 Options analysis

The NZTA have undertaken an alternatives and preferred option analysis for the corridor and key intersections. The preferred option has been selected from the alternatives, but still creates a degree of adverse effects including transport, visual, heritage, cultural and ecological effects.

Relief sought

- a. The Council requests further information on the alternatives to understand the impacts on the key areas:

2.3.2 Anns Creek

The development of this option has resulted in the designation being aligned in Ann's Creek estuary.

Relief sought

- a. The Council requests further information to assess the transport constraints that led to this alignment and to confirm that there was not an alternative option that provides project benefits with lesser adverse effects to identified Outstanding Natural Features (ONF) and Significant Ecological Areas.

2.3.3 Neilson Street

The Council considers that there are elements of the design of the Neilson Street Interchange and SH20 that could be amended to increase the extent of connectivity to Onehunga Wharf and reduce the severance between the wharf, town centre and inlet.

Relief sought

- a. The Council requests that alignments and design modifications that reflect less severance of the wharf from the town centre are considered and a direct connection, or separate connections for active modes and motorised vehicles, are provided to deliver improved connectivity between the Onehunga Wharf and Onehunga Town Centre.

2.3.4 SH20 and the Galway Link

Elements of the geometric design in the vicinity of SH20 and the Galway Link require reconsideration especially for heavy vehicles. This includes limited clearance in the vicinity of SH20, and limited queuing space between intersections at each end of the Galway Link.

Relief sought

- a. That the NZTA undertakes and provides to the Council micro-simulation modelling of the EWL and local road network at intersections around the Galway Link Road, Onehunga Wharf and Onehunga Mall area to demonstrate the capability of the proposed design to operate at an appropriate 'Level of Service'.
- b. That NZTA provide a layout that delivers the required network capacity and connectivity in the area surrounding Galway Street and Alfred Street.

2.3.5 Hugo Johnston Drive

The Council seeks to understand the role and function of the Hugo Johnston Drive link. This road will have a large catchment and corresponding traffic demand, but currently is denoted as unsuitable for high volumes. On street parking and frequent access for local premises has the potential to result in congestion and safety issues.

Relief sought

- a. The Council requests confirmation of the nature and suitability of the EWL/Hugo Johnston Drive link.

2.3.6 Grade Separation of Great South Road intersection

This proposal has not been fully detailed in the applications and results in some loss of amenity for local traffic, particularly in relation to the Hugo Johnston Drive Intersection compared to the at grade intersection presented through earlier phases of the scheme development.

Relief sought

- a. The Council requires further information on the reasoning for the provision of a grade separated intersection at this location.

2.3.7 General

There is no analysis on adequate access for over dimension vehicles along the EWL given the industrial nature of the local area. A suitable route for these types of vehicles enables connection between SH1 and SH20 minimising travel through the local road network.

In addition the Council has concerns that the EWL design uses minimum rather than desirable standards for road geometrics which may not be appropriate for large vehicles and vulnerable road users. This has the potential to reduce efficiency and safety outcomes for the project. The project seeks outcomes which focus on providing improved freight efficiency, yet there is a lack of clarity regarding the routes which would be available for High Productivity Motor Vehicles (HPMV) and over-dimension vehicles.

East West Link Submission Form

In addition vehicular access to facilitate emergency access to and maintenance of the foreshore, boardwalks, wetlands and other infrastructure has not been shown within the applications.

Relief sought

- a. Provide further analysis on adequate access for over dimension vehicles along the EWL given the industrial nature of the local area. In particular:
 - i. evidence to demonstrate that the proposed alignment meets the geometry requirements for all vehicles using the corridor which should include over dimension and HPMV vehicles.
 - ii. Safe facilities for maintenance and emergency access to the foreshore be identified.
- b. Provide evidence that the safety of all road users, including active modes has been considered in the design with specific reference to the ability to accommodate large vehicles through appropriate lane widths and link radii.
- c. Provide additional evidence related to the assessment of operational performance at intersections where queueing may impair efficiency. Additional signage may be required to support safe efficient route choice between the local road network and EWL.

2.4 Consideration of Public Transport

The Council supports the delivery of a high quality, efficient public transport system which will integrate with the EWL as well as with proposed future mixed use development at the Onehunga Wharf and Onehunga Town Centre.

The Council recognises that the project has considered the potential future Mass Rapid Transit (MRT) schemes within the assessment and application. These future schemes would support the delivery of a high quality, efficient public transport system which is well aligned with Council policy and strategy, and therefore supports the integration of design elements enabling future light rail or heavy rail connections to Mangere and the Airport into the EWL design.

Relief sought

- a. The Council seeks to understand how the EWL will support high quality and efficient public transport connections (including the option of heavy rail) around these future development areas and the wider network, and any amendments required to the EWL to ensure that efficient provision of public transport is not prevented or hindered.

2.5 Amenity and Provision for Active Modes

The EWL compounds the severance between Onehunga and the foreshore and Onehunga Wharf area, including the pedestrian and cycling connections with the proposed 'new old Mangere Bridge' scheme. The Council has concerns that the changing traffic composition/ flows/speeds on parallel routes to the EWL will affect the environment and may have a negative impact on active users. Further information is required for the Council to assess the implications for those travelling on foot or bicycle.

The current EWL proposal includes restricted pedestrian/active user connections with the Mangere Inlet and there is a lack of linkage between the boardwalk and the shared pedestrian cycleway adjacent to the carriageway. The proposal provides for several pedestrian and cycle connections across the EWL road. These

East West Link Submission Form

provide north-south connections between local roads and boardwalk but do not fully mitigate nor improve upon the current amenity of these users given the level of severance resulting from construction of the new road. Pedestrian and cycle routes at several locations in the proposal appear convoluted and do not consider pedestrian/ active user desire lines. This is not conducive to encourage users to use the facilities.

Relief sought

- a. The Council seeks modifications to the EWL to reduce the distance between crossing facilities on the EWL and improved connectivity and amenity for key walk and cycle desire lines through Onehunga.

2.6 Parking

There has been some consideration given to the effects of the project on parking, although the information included within the applications does not provide sufficient information to confirm that the residual parking provision will be sufficient for the safe and efficient operation of the network.

The facilities for parking to serve leisure users of the foreshore are constrained to Hugo Johnston Drive. This car park is also stated to provide offset parking for lost parking further north on Hugo Johnston Drive and serve as a turning facility for heavy vehicles. The location and combined form of the facility is considered to be undesirable on safety and amenity grounds.

Relief sought

- a. The Council requests the NZTA provide sufficient on-street parking to mitigate the effects of the proposal.
- b. The Council requests that the combined parking and turning facility on Hugo Johnston Road be relocated or the form be amended to provide improved amenity for all users.

2.7 Construction Effects

The Council is concerned regarding potential EWL construction effects on the local and regional community which may result in congestion and reduction on public amenity during the construction period.

Relief sought

- a. The Council request further information in relation to either the assessment of the effects of the construction or how this is to be mitigated with particular emphasis on, but not limited to:
 - Neilson Street interchange
 - Great South Road
 - Pedestrian
 - Cyclists
 - Public Transport
- b. The Council seeks the preparation of a Construction Management Plan to address congestion, reduction of amenity, traffic diversion and to protect the safety and amenity of all modes, including pedestrian, cycle, bus and local traffic. The Council is willing to work with NZTA in developing this plan.
- c. The conditions related to the Construction Traffic Management Plan contain specific performance criteria for Public Transport. An additional clause should be provided to Draft Condition CT.2 as follows:

“Where road closures or restrictions cannot reasonably be avoided, the particular vulnerabilities and sensitivities of cycle route diversions and reduced conditions shall be taken into account in the planning of any closures or restrictions”

3.0 Economics

The Council supports the proposed EWL based on the economic benefits that are expected to accrue largely as a result of the travel time savings across the network.

3.1 Role of the EWL Project Area in the Auckland and New Zealand Economy

The EWL project area plays a fundamental role in the Auckland and New Zealand logistics and manufacturing sectors. NZTA's *Report 3: Economic Assessment* report shows changes in the number of workers in these sectors in the EWL project area. The Council highlights that:

- Changes in logistics and manufacturing employment in the EWL project area have been much in line with the change in structure of the New Zealand economy more broadly.
 - The EWL project area employs around 20% of all logistics workers in Auckland and 9% of the New Zealand logistics workforce. The EWL project area has maintained its crucial role within the logistics services industry over the last nine years.
 - The EWL project area accounts for around 18% of Auckland's manufacturing and 6% of manufacturing activity in New Zealand, a share it has maintained over nine years.
- The EWL project area is playing an increased role in advanced business services as well as its fundamental logistics and manufacturing role. This is evidenced by the fact that between 2000 and 2015, advanced business services employment in the EWL project area grew by around

109%, compared to 51% across Auckland, and 46% in New Zealand. The EWL project area has thus seen significant relative growth in these service industries.

3.2 The Composition of, and Changes to Benefits

One of the key drivers of support for the EWL project by the Council is its significant estimated economic benefits. In light of this, it is important to understand the full extent of the gross and net benefits estimated and the assumptions underlying them, taking into account disruptions during construction and the benefit flows after completion.

Further, there have been substantial changes to the preferred option since the Detailed Business Case was completed. The Council seeks to understand what these changes may imply for the economic benefits of the project.

Relief sought

- a. Following on from requests set out in the Transport and Traffic section of this submission, the Council would like access to the modelling used to estimate the gross and net economic benefits, much of which will likely have followed from the transport benefits estimated.
- b. Further, the Council would like access to any work done on how the estimated gross and net economic benefits may have changed given adjustments to the preferred option since the Business Case was completed.

4.0 Landscape and Urban Form / Built Environment

4.1 Coastal severance, urban structure and network connectivity

Severance is a matter of particular concern along all coastal edges as the EWL alignment separates Onehunga from the Mangere Inlet, and leads to further isolation of the Manukau Harbour foreshore, Te Hopua Tuff Ring and Onehunga Wharf.

Blocks along the Mangere Inlet are very large with three street connections along this edge. Such limited access might be suitable when lots are very large and in industrial use, but the blocks close to Onehunga town centre entrench industrial activities at and near to the coastal edge, and would not support any future changes towards mixed land use. While several pedestrian and cycle connections are provided, including at one of the three intersections, these do not provide sufficient access to the foreshore nor sufficiently mitigate severance. Where people might be expected to access the water edge, in this case from Waikaraka Park in the east back to the Onehunga town centre in the west, more frequent connections that provide both physical and visual access are required.

Relief sought

Enable greater connection and accessibility to the coastal edge in general and the new coastal path by:

- a. Widening the proposed land bridge to extend as far west as the 'New Old Mangere Bridge' and provide a street connection down into Onehunga Wharf.
- b. Providing an appropriate street connection at Alfred Street.
- c. Providing for pedestrian and cycle access across the EWL from all north-south streets.
- d. Ensuring that the intersection design allows for pedestrian crossing across Captain Springs Road at the EWL intersection.
- e. Introducing a number of 'coastal access areas' accessed from the light controlled intersections on the EWL, each with limited carparking to support recreational and maintenance access, and provide Universal Access.
- f. Providing a new pedestrian and cycle way along the Miami Stream from the EWL to Miami Parade.

4.2 Design integration

Onehunga is likely to see significant future change, including in addition to the EWL, construction of the 'New Old Mangere Bridge', installation of a MRT public transport route across the inlet, and development of Onehunga Wharf. This confluence of related projects demands that integration of the planning and design of all of these projects is achieved, integration which has not been satisfactorily achieved to date. Furthermore, the route for the MRT has yet to be finally confirmed, so the planning of the EWL here should consider both the most likely and any other likely routes that may be considered.

Relief sought

- a. Ensure planning and infrastructure integration at the Onehunga Wharf and town centre area including in relation to Auckland Transport's MRT project and potential routes for that. In doing so ensure the proposed vertical alignments of future MRT and how they relate to the EWL and all other spaces and routes around are described to enable understanding of different configurations and their effects.
- b. Demonstrate suitability of alignment of an elevated public transport route from the town centre over the inlet and potential connection across to Mangere Town Centre in relation to achieving positive urban design outcomes.

4.3 Information and representation

In several parts of the project the road(s) and/or shared paths occupy multiple levels, and there are complex interactions with existing and future proposed structures. In these areas there is insufficient information to accurately determine the potential urban design effects.

Relief sought

- a. Provide evidence demonstrating the three dimensional form of the proposal including 3D modelling/animation (surface only visuals rather than full detail including landscape) allowing a fly through of key complex areas to allow the impact and suitability of the alignment to be assessed and to determine the potential impact on urban design outcomes. The areas where this is considered important are: the Neilson Interchange area, the connection with the future mass rapid transit link and the Anns Creek/ Great South Road interchange.
- b. Provide plans of each level where multiple levels are intended.

4.4 Mana Whenua

The proposed alignment options and designs have sought to avoid potential adverse effects on cultural values and a key response is stormwater treatment along the foreshore. The application further recognises the Kāretu portage and offers opportunities to improve awareness and legibility of the cultural values of this area. Specific measures proposed to appropriately recognise and remember cultural values include signage and interpretative information on the portage area, structure design and in particular, the design beneath the viaduct structures through Anns Creek, as well as landscaping to provide for the legibility of this historic link at Sylvia Park Road. However mitigation in the form of recognition of Mana Whenua associations with both Onehunga and the Manukau Harbour remain unresolved: there is little clarity about what form such measures might take and uncertainty about whether they would actually be implemented.

Relief sought

- a. Ensure the project provides Mana Whenua recognition in the design of key urban design and landscape elements, including implementing the ideas contained in the Urban Design and Landscape Framework plan.

4.5 Mangere Inlet and coastal edge landscape

Encroaching into the margins of Mangere Inlet, the proposal exacerbates decades of past reclamation and modification. This, in conjunction with the industrialisation of most of its immediate hinterland, has reduced the coastline's natural character and landscape values to a low level. While the outlying 'lava fields' / promontories, wetlands, ponds, and coastal planting proposed within the inlet's water area would artificially enhance its perceived naturalness they would not, in terms of section 6(a) of the RMA, improve its natural character overall. Nevertheless the combination of a more natural looking coastal edge, enhanced landscape and recreational values, improved stormwater management and perceived integration with the recent improvements to Onehunga Bay's foreshore would serve to largely offset these effects. As a result, the EWL would, as a whole, be relatively benign in terms of its effects on the landscape characteristics and values of the inlet but other concerns such as ecology and impact on Waikaraka Cemetery and Park remain.

City/harbour severance is a major issue, and visual severance should not be exacerbated by unnecessarily high bunding at the outer edge of wetlands and stormwater retention ponds. Additional height at the proposed promontories will, however, have a positive visual effect. The proposed bunding (to RL 3.0) will enable views to, and across, Mangere Inlet and a transition down from the existing coastal terrace, open spaces and EWL to the coastal marine area. However the Council notes that these wetland pond edges could be raised initially to RL 3.3 or 3.4 to allow for gravity feed of stormwater from the ponds to the inlet. As sea level rises, raised bund levels may be accommodated in the course of periodic future pond maintenance. This approach would reconcile minimising visual severance now with providing functional resilience for the future.

The proposal describes positive general intentions for landscape here, but lacks detail in a form that will allow understanding of views from ground level to and along the EWL and along the coastal path. Further description is required.

Relief sought

- a. Ensure that the conditions on the project ensure that coastal bunds around the proposed wetland areas are initially as low as possible (not more than RL3.4), and increase in height incrementally in combination with planned maintenance and as sea level rise occurs over future decades.
- b. Provide evidence in relation to the Mangere Inlet edge proposed contours, and the intended location, scale and type of large scale and bulk planting in a form that can be used to help understand the experience for road users, and the quality of views towards the road.

4.6 Coastal edge path

Introduction of the road corridor to Mangere Inlet's shoreline would remove the existing coastal path and degrade some of the more passive, open space qualities currently associated with this coastline.

Loss of the existing esplanade reserve requires mitigation by replacement with something of equal quality, and the proposal for a high-quality replacement coastal pathway offering recreational amenity and pedestrians and cycle access along the water edge is supported in principle.

The alignment of the coastal path varies, and it is likely to be pleasant and attractive for pedestrians and cyclists. However some long straight sections of boardwalk may be monotonous, and there are safety concerns arising from the lack of connection from these longer sections of the boardwalk to the shared pedestrian cycleway adjacent to the carriageway.

The coastal path is indicated to be a combination of boardwalk and gravel. Gravel will provide for cyclists on mountain bikes, however would not readily provide for the widest range of cyclists nor be accessible and usable to the greatest extent possible by people of all ages and abilities ('Universal Access' as defined in the Auckland Unitary Plan – Part Operative).

Relief sought

Amend the project to:

- a. Provide additional connections between the edge of the EWL and the longest sections of the boardwalk coastal path to provide for means of access to (and potential escape from) these sections of the path.
- b. Address lack of variation of alignment on some very long straight sections of the boardwalk.
- c. Provide acoustic treatment immediately adjacent to the carriageway to address noise towards the new facility.
- d. Apply and implement CPTED principles and ensure safety for path users.
- e. Hard pave the proposed gravel path surface to be suitable for all types of cycle users.

4.7 Pedestrian amenity along the EWL

The proposal does not fully achieve the EWL project's urban and landscape design objective to provide a landscape where pedestrians can appreciate and relate to the place. Specifically footpaths edging the EWL vary in width along their length, are too narrow in some locations and, being right at the edge of the carriageway, will lack amenity.

Relief sought

Amend the project to:

- a. Ensure all footpaths along the edge of the EWL are of generous and consistent width, and are separated from the carriageway by a planted strip.
- b. Relocate the footpath which is to the north of the EWL and between Galway and Alfred Streets further from the kerb edge and up the slope to ensure a higher level of amenity for pedestrians.

4.8 Kāretu Portage Path

The elevated walkways on the EWL as it passes over the Anns Creek area and further east provide an important pedestrian and cycle connectivity benefit, and for elevated views over Anns Creek and the Mangere Inlet. The proposed Kāretu Portage path provided is suitably wide, is appropriately separated from the EWL carriageway and potentially offers a safe and pleasant cycling/walking experience. However, in parts the portage path is elevated a great distance above ground, which might deter some potential users. Further vertical connections are likely to be necessary for both convenient access and the safety of users.

Relief sought

Amend the project to:

- a. Provide stair access to the Kāretu Portage Path at Great South Road to complement the ramp access there, and provide for egress from the route. In planning this consider the entire length of the elevated path with respect to convenient access and egress for safety.
- b. Ensure the design and materiality of the structure mitigates potential vandalism.
- c. Appropriately recognise and remember Kāretu Portage including with signage and interpretative information on the portage area, structure design and in particular, the design beneath the viaduct structures through Anns Creek, as well as well as landscaping to provide for the legibility of this historic link at Sylvia Park Road.

4.9 Te Hopua Tuff Ring, Orpheus Drive and the Sea Scouts Building

New roading and bridging proposed here will amplify separation of the Te Hopua Tuff Ring from the Manukau Harbour and lagoon. The proposed shared pedestrian and cycle path between Onehunga Wharf and Taumanu Reserve appears to lack the width and quality consistent with paths and environment in Taumanu Reserve and on the intended coastal path along the Mangere Inlet.

The view of the vehicle overbridge and landing at the connection with Neilson Street will be prominent in view and may impact on the Onehunga Town Centre and its view connection to the water edge.

Relief sought

Amend the project to:

- a. Provide mitigation within the coastal marine area of the Te Hopua Tuff Ring Outstanding Natural Feature, including the restoration of the feature and adjacent area.
- b. Provide evidence on proposed concepts for recognition and acknowledgement of the Kāretu Portage and the commitment to contribution of Mana Whenua in the establishment of artworks in this area.
- c. Underground or remove the Transpower transmission lines as means to mitigate visual dominance of the tuff ring and the Sea Scouts building and to optimise the environment around the Landing and Onehunga Wharf.
- d. Develop the design of the shared pedestrian and cycle path between Onehunga Wharf and Taumanu Reserve to be wider and of high amenity that is consistent with the quality of paths and environment in Taumanu Reserve and on the intended coastal path along the Mangere Inlet.
- e. Provide three-dimensional drawings of the EWL and its relation to the Sea Scout building and Orpheus Drive, and the overbridge and Neilson Street connection and views towards that from representative public viewpoints. This should also show landscape and surface treatments (including proposed parking areas) and shading analysis to determine the effects of the EWL configuration on the Sea Scouts building.
- f. Provide evidence to show how the landscaping for the overbridge and Neilson Street connection appropriately addresses the visual prominence of the structure and the town centre to harbour visual connections.

4.10 Onehunga Wharf and Connections

The Council is concerned with the quality of connections between the Onehunga Town Centre and Onehunga Port. The proposal would compound the severance of Onehunga Town Centre from the Port, the New Old Mangere Bridge and the Manukau Harbour, resulting in additional isolation of Onehunga's key features.

Relief sought

Amend the project to:

- a. Provide for vehicle access into Onehunga Wharf, in a configuration and location that will provide for future development of this area.
- b. Extend Orpheus Drive east of the land bridge as far as the connection to the 'New Old Mangere Bridge', with this potentially being a shared surface.
- c. Extend the proposed land bridge to the east to include the alignment of the 'New Old Mangere Bridge' connections.
- d. Describe landscape/streetscape treatment around the edge of the link by Onehunga Harbour Road and Onehunga Wharf, and on the land bridge.
- e. Describe design intentions around Onehunga Harbour Road, including under the SH20 Bridge, showing intended streetscape and means of mitigation of noise and increased traffic flows.
- f. Describe potential scope of landscape/streetscape treatment on the land bridge and means of vehicle access down to Onehunga Wharf, integrating this with a landscape treatment for the wider tuff ring and Onehunga Harbour Road.

4.11 Relation to Onehunga Street System

The traffic environment on the existing street system within Onehunga and environs (particularly Neilson Street) will change with significant volumes of heavy traffic diverted to the EWL, and this offers potential amenity benefits. The amenity enhancements to these local arterial streets and intersections on which traffic flows are reduced are unclear.

Relief sought

- a. Ensure the scope of the project includes changes to the street system and intersections around, in particular Neilson Street, to respond to the change in street status and use by providing a higher amenity and safe environment for all users. Describe these changes and how they will be effective in maximising the benefits of traffic flow reduction.

4.12 Galway Street Alignment

The proposed extension of Galway Street will create a bending curvilinear 'motorway on-ramp' style geometry road incongruous with the more regular Onehunga grid. This alignment may also limit options for the proposed MRT link between Onehunga and the airport. A related concern is that the proposed roundabout at the Onehunga Mall and Onehunga Harbour Road intersection may not provide a pedestrian-friendly environment, and will hinder connectivity with the 'New Old Mangere Bridge'.

Relief sought

- a. Realign the Galway Street connection to separate from Onehunga Harbour Road and relate to the Onehunga urban grid rather than follow the proposed curvilinear configuration.
- b. Consider an alternative design for the Galway Street/Onehunga Mall and Harbour Road intersection to provide improved functionality for all modes, including convenience and amenity for pedestrians and cyclists, between the Onehunga Town Centre and the wharf area.
- c. Provide for a pedestrian crossing facility at the Galway Street intersection with the EWL.

4.13 Waikaraka Cemetery and Park

The EWL increases and would perpetuate visual and physical severance from the Mangere Inlet. Waikaraka Park is a large and popular recreation space and it is important to provide a strong landscape/spatial interface with the foreshore and physical connection with the coastal paths. The current widely separated crossings, at-grade at Captain Springs Road, and a pedestrian/cycle overbridge at Alfred Street fail to achieve sufficiently strong physical (or visual) connection, and the centre of the park is not connected. The Council also has concerns about the significant impact on the ambience and amenity of Waikaraka Cemetery, including its value as a place of remembrance, contemplation and spiritual value.

The proposed design provides no or only limited visual connection between the cemetery and the inlet, with the only openness occurring at the centre of the park/cemetery edge (in the vicinity of park benches) and the environment there will be dominated by the noise and views of moving traffic. In dealing with noise and visual effects of moving traffic within the park, a suitably scaled landscaped bund might be used, and this should be turned to an advantage to create a high quality landscaped southern edge to the park/cemetery, in combination with new opportunities for elevated viewing in all directions and access up to a relocated pedestrian/cycle bridge.

Relief sought

In addition to the relief sought under 'Coastal severance, urban structure and connectivity':

- a. Enhance connectivity (both visual and physical) between Waikaraka Park/ Cemetery and the inlet for pedestrians and cyclists. One option may be to relocate the planned Alfred Street pedestrian and cycle overbridge to a strategic position at the centre of the Waikaraka Park edge where it, in combination with the at grade crossings provides optimal connection between the park and the inlet, and for elevated public views over both the inlet and Waikaraka Park. Provide a safe route to a centrally located bridge through the cemetery and park for use by commuter cyclists after dark.
- b. Provide evidence for how the design will attenuate noise in this area and appropriately define this space. One option may be to provide a raised bund (which might rise to approximately 4m) along the southern extent of the Waikaraka Park/Cemetery for acoustic and spatial definition purposes, provide access to the top of this for views over the Mangere Inlet as well as Waikaraka Park.
- c. Extend and intensify the landscape treatment along the full width of the Waikaraka Park interface as a coordinated, whole of area plan, including provision at Waikaraka Park South.

4.14 Anns Creek

The natural character and landscape effects of the project are limited by the presence of adjoining industrial activities and structures, and the potential for larger scale industrial type development to emerge around Anns Creek in the future. As a result, the proposal and its associated viaduct would be acceptable in terms of natural character and landscape effects. However, at the same time the Council has significant concerns regarding the alignment, and considers that the overbridge should be moved north to completely avoid the lava scrubland and associated wetland at Anns Creek.

Relief sought

- a. Re-align the EWL in the vicinity of Ann's Creek or alternatively provide evidence to justify why the alignment cannot be moved to the north of Anns Creek.

4.15 Hugo Johnston Drive

An area of carparking is shown on the landscaped area above Anns Creek and to the west of Hugo Johnson Drive. This appears to be both an unnecessary significant visual intrusion, and inefficient in its configuration. It may also prove to be a security risk for parked cars and a safety risk for users due to relative remoteness and lack of informal surveillance.

Relief sought

- a. Confirm the necessity for the carparking area proposed in the planted area to the west of Hugo Johnston Drive. If parking is necessary, its location, extent and configuration should be reconsidered and a CPTED assessment should be provided. This matter is also addressed in the Transport section of this submission.

4.16 Hamlins Hill / Mutukaroa Regional Park

The Proposal will enhance access to Hamlins Hill for pedestrians and cyclists. However, it is unclear if the designation indentation in front of the Rakon premises is designed to cater for off-road parking or not; if not, then there would be no motorists' access and the reserve would be severely hampered by a lack of road-side parking within the Sylvia Park Road corridor and adjoining streets.

Relief sought

- a. Provide evidence on whether the designation in front of the Rakon premises is designed to cater for off-road parking, and if not, ensure that adequate public parking opportunities are provided.

5.0 Coastal Processes

5.1 Reclamation and Boardwalks

The Council considers that one of the greatest potential adverse effects of the proposal are these arising from the extent of reclamation proposed. As the applicant has noted, under the 'bundling' approach, the activity status of the proposal is a non-complying activity. The proposal presents challenges in terms of both its scale of effects and compliance with the relevant policy direction.

The general policy approach in the New Zealand Coastal Policy Statement (NZCPS), Auckland Unitary Plan and Auckland Regional Plan: Coastal is that reclamation should be avoided unless it meets a limited set of criteria. Where reclamation is considered appropriate, its form and design should be considered carefully to ensure they minimise adverse effects on coastal values.

A total reclamation area of 18.4 hectares above mean high water springs (total footprint of 24.2 hectares) is proposed. This is a significant area and would be one of the larger reclamations ever undertaken in Auckland. Only 5.6 ha of this area are actually required for the road embankment. An additional 12.7 ha is proposed for landscape features and wetlands (table 6-2 in the application's AEE, page 55). A further 6.68 ha of the coastal marine area will be occupied by structures including boardwalks, bridges and landscape features. This is a large area of new activities extending into an inlet with high values for avifauna, much of which is a Significant Ecological Area.

NZCPS policy 10(1) requires that reclamation be avoided unless there are no practicable alternatives and the reclamation will provide significant regional or national benefit. The Auckland Unitary Plan has a corresponding approach in F2.2.3 policy (1) but also requires that 'efficient use will be made of the coastal marine area by using the minimum area necessary to provide for the proposed use'. The more enabling policy recognition of the need for reclamation for infrastructure (NZCPS policy 10(3) and AUP F2.2.3 policy (2)(e)) sits alongside the need to minimise the area of reclamation. The Council seeks that an overriding consideration of the proposal assessment should be that the area of reclamation should be minimised as much as possible. The discussion elsewhere in this submission regarding whether this is the most practicable option is directly relevant to this consideration.

The Council considers there is scope to reduce the scale of reclamation and structures in the coastal marine area by re-configuring the walkways and cycleways. The desire to separate commuter and recreational cyclists and walkers appears to have increased the scale of effects. The right balance should be struck and a smaller area may be possible if these modes are combined for some sections of the proposed route.

The form of the proposed reclamation is designed to re-create a more natural coastline through a series of headlands and embayments. The Council questions whether this form is appropriate as it will extend the area of reclamation. It will also lead to a more depositional environment at the edges of the inlet.

The application does not appear to include any demonstration of preliminary coastal engineering within the design of the reclamation and coastal structures. The design appears to be dictated by the historic landform that has since been reclaimed and the required area for stormwater treatment. There is no evidence provided to support the proposed configuration of headlands and embayments within the application. Furthermore, the coastal processes report does not accurately reflect the potential adverse effects as reflected in the hydrodynamic modelling. For example, the significant increase in sediment deposition within the embayments.

The application modelling predicts a significant (five-fold) increase in sediment deposition within the new embayments, with rates predicted to increase from 5mm/yr to 30mm/yr. The Mangere Inlet is currently a sediment and contaminant sink. The sediment source is predominantly from redistribution around the harbour and inlet rather than from the catchment (application technical report 15, page iii). The proposed stormwater ponds will not address much of the deposition already occurring.

The current coastline along the northern shore of the Mangere Inlet has a very low degree of natural character as it is predominantly hard protection works with a straight linear form. An alternative, more natural, edge form would be appropriate but alternative configurations of the reclamation that promote lower rates of deposition along the northern coastline should be considered, for example smoothing the coastal landforms to facilitate the circulation of fine sediments with the tidal ebb and flood.

Along with increased deposition rates, the currently proposed configuration is likely to result in an increase in mangrove colonisation and further encourage sedimentation over time in this area. This will impact on the benthic ecology of the area and reduce views across the water. It could incur ongoing mangrove management and maintenance costs in response to an artificial scenario. Conversely, in the flat, central area of the Mangere Inlet, modelling shows the environment will become more erosive.

The Council has concerns about the form of the reclamation in terms of the bund level required for the stormwater treatment wetlands. In the application, the outer coastal bund has been designed to a present day crest level of 2.8 to 3.0m RL. It is understood that at some 'stormwater treatment' sections this level has now been increased to 4.2m RL. However the extent and updated design of this is not clear. It is assumed that the remainder of the bund along the foreshore works remains around the 3m RL level. This is below the present day 1% Annual Exceedance Probability coastal storm surge event, not considering any additional freeboard or allowance for sea-level rise (which it is proposed can be retro-fitted over time). It is not clear what will trigger subsequent retro-fitting and the responsibilities for ensuring that occurs, or what the implications of this will be on the ongoing maintenance of the structures, including the proposed coastal walkway, and any joint probability analysis to consider the additional impacts of catchment flooding.

5.2 Mudcrete

The proposed use of mudcrete to construct the outer bund appears to be predominantly based on the economic benefit of using locally sourced material. The application of mudcrete structures in New Zealand is limited and typically confined to small scale, localised structures. Its application also necessitates significant dredging of the Mangere Inlet which introduces a range of environmental concerns that could otherwise be avoided.

The dredging report predicts 10 – 50mm/yr of weathering of the mudcrete bunds, with average rates of 20mm/yr predicted in the Mangere environment. It is stated that this weathering will be inconsequential as the structures will be covered by beach, rock or a hardened surface, however this is contradictory to the design cross sections which shows some sections left exposed. This will result in ongoing maintenance requirements and costs that should be avoided.

5.3 Dredging

East West Link Submission Form

The application notes that while it is currently envisaged that the foreshore bunds will be constructed using dredged material to form mudcrete, the excavated marine sediments may be replaced with imported fill. The application describes this as 'retaining flexibility for the import of material depending on the final design and contractor's proposed methodology' (AEE page 98). The Council's preference is that alternative sources of material are used if possible. A condition on the consent could require that alternative sources are assessed in more detail before the works methodology is confirmed.

The proposed dredging includes an area of 15 ha of subtidal area, a new 10m wide channel to replace an existing channel that will be covered by reclamation, and a temporary channel to transport material from the dredge area to the project area. This is a significant area of works which will have some sediment plumes in a sensitive ecological area which already has degraded water quality.

It is estimated that the average release of sediment will be some 1.5 to 2.5% of the natural sediment flux as a result of the dredging practices. As the dredged material is native and not an introduced source it is considered that the impacts on water quality will be minor as long as appropriate comprehensive mitigation measures are put in place. However, this assessment does not take into consideration the effect of disturbing contaminated material through dredging practices. It is noted that the contaminants data indicate that variable contaminant levels dependent on depth and location. An updated dredging report and related documentation should be provided to reflect the proposed increase in bund height to 4.2m RL. This will significantly increase the required dredging volume and the duration of its practice. Revised information is required to make an accurate assessment of the potential adverse effects of the current proposal.

While the Council is supportive overall of the creation of the stormwater treatment areas, a thorough analysis of alternatives to dredging to create them is needed to ensure that the method with the least environmental effect is used. Such an analysis should, for example, consider options to source suitable material from land-based sources, advantages and disadvantages of different alternatives (e.g. costs, impacts on traffic movements, ecological considerations) and provide clear reasoning why a certain method is preferred over another.

5.4 Relief Sought:

- a. Redesign the form of the headlands and the extent of walkways and cycleways so that a smaller area of reclamation is required.
- b. Avoid or minimise dredging to the greatest extent practicable.
- c. Clarification of the form of the mudcrete areas (cross sections) and more investigation of alternative materials to prevent weathering.
- d. Provide further analysis of the erosive areas and potential contaminant release from dredging, and propose any necessary conditions to adequately mitigate adverse effects.

6.0 Ecology

- 6.1** Council considers that the ecological impacts of the proposal will have significant adverse effects, including impact on remnant habitat in Anns Creek that is so unique it cannot be easily offset or mitigated.
- 6.2** The inclusion of boardwalks is supported where they mutually facilitate pedestrian and cycling options and promote improved relationships with the Mangere Inlet. However, the Council's opinion is that providing greater accessibility should not be at the expense of other values such as bird habitat. The inclusion of a boardwalk in the coastal marine area is a concern from an ecological point of view as it will have a significant adverse impact on the ecology of the marine environment.
- 6.3** NZTA have proposed mitigation and offsets which have a wider application and benefit than just to the immediate area and the Council supports this for a nationally significant project. The Council agrees that it is appropriate to view mitigation and enhancement on a holistic scale for a project of this size and scale. However, given the significance of the Proposal and the environmental impact it will have, the Council seeks additional mitigation measures and offsets which would have an even wider beneficial implication for the Manukau Harbour, including additional planting, habitat protection and management which extends to beyond a five-year period where necessary.
- 6.4** The Council considers that the adverse effects of the proposal on the general terrestrial and marine ecology of the area are significant. The Proposal seeks to alter a large area of the coastal environment as part of the construction and maintenance of the EWL road and the construction and maintenance of significant stormwater treatment areas in the coastal marine area. While the Council accepts that one of the ultimate benefits of the Proposal will be to enhance the water quality of the Manukau Harbour by improving the stormwater quality of the entire catchment, the short and long-term adverse effects on sensitive ecological and geological areas must be balanced against the economic and other benefits of the Proposal. Whether or not the water quality of the harbour could be improved and the catchment treated without the magnitude of the proposed structures has not been fully explored.

6.5 Relief Sought

- a. The Council seeks that the project be amended to, as much as possible, minimise ecological impacts. In particular, the effects of the proposal on the significant ecological areas within Anns Creek, and the dredging for reclamation material which in the Council's opinion would have significant physical and ecological impact, needs to be minimised.
- b. Additional conditions should be imposed once detailed design plans are available to avoid/minimise impacts during vulnerable life stages of species (e.g. breeding season of birds, migration of (diadromous) fish species, spawning season benthic species etc...).
- c. Conditions requiring the use of methods to contain and restrict the dispersal of sediment discharges from dredging, declamation and reclamation works (e.g. via silt fences surrounding the entire area of works).
- d. Dotterel management guidelines should be followed to protect and manage any nesting birds for the duration of the construction activities in the Mangere Inlet.
- e. Examine the opportunity to replace the pines on Ngagango Otainui Island with native coastal tree species such as karaka to provide future roosting and nesting sites for shags and spoonbills
- f. Examine the opportunity for the Karaka shell banks on the South Manakau Harbour to be given sanctuary status to enable the area to be utilised by displaced birds.
- g. Restoration planting should be maintained for longer than 5 years in some areas.
- h. Weed and animal pest control should cover the entire designation along with a buffer where possible, on adjacent public land and private land with the consent of landowners. Weed and animal pest control will need to continue indefinitely.
- i. Avoid planting tall woody vegetation at Hopua Crater to maintain the preferred habitat for the pied stilt.
- j. Real time turbidity monitoring with agreed limits to suspend dredging if these are breached.
- k. Review of the position and extent of the boardwalks to minimise impact on ecology.

7.0 Stormwater

- 7.1** The Council acknowledges the innovative design measures by the NZTA in terms of the proposed stormwater design treatment. However, outstanding issues are as follows:
- flood risk as a result of the height of the road in relation to flood-prone areas.
 - wetland/biofiltration final configuration details.
 - ability of wetlands to treat leachate.
 - ongoing cost considerations and compensation to the Council for treatment of the new NZTA road.
- 7.2** The Council recognises the long-term benefits of the stormwater treatment areas for the whole catchment and to improve the water quality of the Manukau Harbour. However, the benefits must outweigh the short and long term adverse effects of their construction and ongoing maintenance.
- 7.3** The Council accepts that the NZTA proposed dual pump system will work in concept; however the Council has a number of concerns associated with ongoing operation and maintenance costs, complexity and overall burden of operating this solution. For the Council to accept an asset of this nature a cost share arrangement must be developed with NZTA that accounts for and compensates the Council for the operation and renewal of these assets for the predicted asset life (100 years).

7.4 Relief sought

- a. As per Section 1 'Catchment Hydrology' in the EWL Foreshore Stormwater Treatment Area Design further information (e.g., peak flow and volume) should be provided to the Council in a format that can be reviewed clearly. This is required to demonstrate that the conveyance capacity and resilience of these systems will be designed in order to convey the 1% AEP event (including allowance for climate change) and avoid existing flood risks from being exacerbated. The proposal should include redundancy built in the design to address the risk of blockage of the intake structures and culverts, and sufficient hydraulic head and capacity to ensure these systems operate as intended during high tide conditions and allowing for sea level rise.
- b. Asset Resilience (coastal): The final configuration, including operating wetland water levels, bund heights and outfalls of the wetland/biofiltration system has not been fully agreed with Council at the time of the submission. The specific pumping solution, including the specification, number and backup systems will be addressed during preliminary and detailed design phase of the project. In particular:
 - i. The design must be compliant with the Stormwater Code of Practice and minimises operational costs and maximises the resilience of the asset now and into the future. The Council's preferred design solution is a single pump in option with the wetland operating water level set at ~2.8m RL, the outer bund height set at 3.4m RL and the wetland outfall set above ~2.5m RL with the bio retention outfall set as high as design allows. This option allows the wetland to drain via gravity to the coastal environment, mitigating the requirement for a second set of pumps (and associated cost) at least in the foreseeable future while complying with the NZ Coastal Policy Statement and Stormwater Code of Practice.
- c. Asset Resilience (landward): The Council has co-developed with the EWL Alliance a concept design for the Miami Stream and Galway Street treatment devices that requires pumping the water quality volume and draining via gravity through the road embankment.
- d. The diversion system should be designed in such a manner that the Council retains the option to discharge leachate to the trade waste system. The Council requires this flexibility for the following reasons:
 - i. During periods of extended/extensive maintenance (wetland replanting and re-establishment, forebay sediment removal etc...) diversion of leachate to the trade waste system will be necessary
 - ii. The treatment of leachate in stormwater wetlands is one of the innovative components of this project. Dilution of leachate with stormwater baseflow alone is likely to achieve a quality that can be discharged to the coastal marine environment in line with ANZECC guidelines. However, if the characteristics or concentrations of the leachate discharge change over time the best environmental outcome might be achieved by temporary/permanent diversion to the trade waste system.
 - iii. As stated the treatment of leachate in stormwater wetlands is an innovate approach, the long-term operational effects on the stormwater/biofiltration is, and will remain, unknown until the future. Retaining the flexibility to ensure the continued operation of the stormwater treatment assets is critical.
 - iv. Handover period . The wetland/biofiltration assets represent an innovative approach to stormwater quality management. Continually pumping the water quality volume has inherent risks and learnings associated with the operation management of these assets. The Council seeks that NZTA vests these assets the Council after a minimum 8 year period to ensure that the assets operate in the intended manner. During this time NZTA will be fully responsible for the operation and maintenance costs.

8.0 Closed landfills

8.1 Primary issues of concern to the Council in relation to landfills and leachate are as follows:

- The ability for the Council to continue to meet its consent obligations during and post construction must be maintained.
- The proposal seeks to leave waste encapsulated within the embankment and for the Council to remain the consent holder for ongoing discharges from the encapsulated waste. This proposal is not supported by the Council as it would have limited ability to influence the management of any landfill under the embankment. The Council, in relation to all landfill assets, is actively withdrawing from arrangements where it holds resource consents for discharges from waste that is on non-Council owned land, unless they have unrestricted right of access, including intrusive access. Accordingly, the Council intends to renew (or alter) any related discharge consents in this area in a manner which excludes the embankment landfill.
- The Council is concerned about the ability of the wetlands to effectively and efficiently treat the leachate waste stream in lieu of pumping and discharging to Trade Waste (Watercare) and how the wetlands will be commissioned, monitored and trigger levels derived for diversion to Trade Waste.
- The Council wishes to note a potential impact on it in terms of costs for leachate management and ongoing operational costs associated with this new infrastructure. The Council flags its intention to seek recompense in relation to the impacts of the EWL project on the operational management of closed landfills.

Relief sought

- a. The Council seeks that new discharge consents are obtained to cover the waste beneath the EWL embankment and that these be owned by the applicant.
- b. The Council seeks that any new discharge consents relating to the remainder of the closed landfill for which the new leachate collection system will be developed, should contain monitoring of controls as a more effective measure given the significant amount of historical monitoring data and the difficulty in locating monitoring points outside the Council waste mass yet not within, or downstream of, the waste within EWL designation.
- c. Council also notes that there are a number of potential impacts on Council assets that may not be evident in the short to medium term (e.g. potential ground water level elevations, risk of seepage etc...) and that Council's position should be protected by the requirement for a bond as part of the EWL consents.
- d. NZTA is to be responsible for all consent monitoring (visual inspection of the embankment is required every 3 months), noncompliance investigation and rectification during construction.
- e. Access to the embankment during construction is a significant health and safety risk. NZTA, with Closed Landfills and Contaminated Land Response (CLCLR) agreement, is to be responsible for undertaking these inspections during construction to mitigate the potential health and safety risk.
- f. The NZTA is to provide for access for the Council, or it's Agent, to monitoring / inspection points in the detailed design (i.e. post construction). CLCLR to approve location and design of, including access to, replacement monitoring points.
- g. The NZTA will need to provide access for the Council, or it's Agent, to undertake inspections of the new bund constructed on the seaward side of the landfill.

East West Link Submission Form

- h. EWL detailed design to mitigate impact of the embankment on upstream groundwater levels and potential increase in risk of slope instability, preferential flow paths developing along existing stormwater infrastructure, groundwater contamination and/or leachate seepage.
- i. The detail design of the project does not increase the risk of future seeps from Galway St and provide access for the Council, or its Agent, to undertake investigations and remediation works should any seeps occur.
- j. Conditions provide for progressive decommissioning and replacement of monitoring points including, as far as is practicable, continuity in monitoring data. CLCLR is to approve location and design of, including access to, replacement monitoring points.
- k. EWL detailed design is to allow for leachate treatment within the stormwater wetlands and contingency measures for pumping to trade waste. The Council notes that the proposed design has not as yet adequately demonstrated that the wetlands can effectively and efficiently treat leachate and that the need for pre-treatment has not been ruled out. In addition, costs of the wetlands and the potential reduction in costs associated with reduction in saline intrusion have not as yet been quantified. Appropriate conditions are required to ensure these issues are addressed during the detailed design process.
- l. The replacement leachate management system will need to incorporate redundancy and flexibility if CLCLR need to change anything to address issues in the future.
- m. The wetland treatment systems are designed to accommodate leachate and any foreseeable fluctuations in quality and quantity (based on current data including trends).
- n. The conditions require preparation of a leachate management plan covering the establishment of the wetlands with progressive leachate introduction, monitoring, setting of trigger levels for diversion and maintenance requirements.

9.0 Arboriculture

- 9.1** The majority of the trees and vegetation within the project works area are not significant trees as they are generally parts of larger groups of trees or mass-plantings for ecological restoration and screening purposes. A Tree Management Plan including a full tree protection methodology has been developed to ensure that trees of significance are protected and managed for the duration of the works. In addition, the landscaping which will be carried out as part of the Proposal will include existing trees where possible and opportunities taken to transplant appropriate existing specimens to alternative places along the route.

Relief sought

- a. The Council is satisfied that the conditions of consent and the Tree Management Plan are appropriate to protect any significant vegetation within the vicinity of the route. The conditions should require the Project arborist to work with the Council arborists as the construction progresses to ensure that effective protocols for tree protection and management are followed.

10.0 Built Heritage

- 10.1** The Council considers that the project's effects on built heritage are of a concerning scale, noting that many scheduled and unscheduled heritage places along the route are impacted. These built heritage issues are a matter of national importance, and are linked with other matters of concern such as landscape/urban environment and archaeology features. The Council is not in disagreement with the overall Built Heritage assessment and its findings, and has had the benefit of ongoing discussions with the NZTA, Heritage NZ and relevant experts in the lead up to notification. This has been an iterative process, with issues being raised and clarified at a series of regular meetings and it is expected that this will continue through the submission and hearings process.
- 10.2** The Council supports specific amendments to, and clarification of, the proposed conditions in order to ensure maximum positive heritage outcomes as part of the EWL project. Ascertaining what may be required for built heritage features that are not scheduled/listed are considered important given that there are a number of such features that may be identified and affected as part of the construction process. Clearly defining structural condition surveys and when they may be required is also considered to be imperative.
- 10.3** The Council notes that the ownership history of the Sea Scouts building is complex. Based on the information available to date, the Sea Scouts building is not Council owned, it was gifted to the Sea Scouts group in circa 1977 by the Ministry of Works. The Sea Scouts hold a permit to occupy the coastal marine area.
- 10.4** The Council wishes to note that it supports the retention of the Sea Scouts building in situ, and mitigation measures to ensure its ongoing use. The Sea Scouts building is of particular focus in terms of its location, heritage values, community interest, and the fact that it must be vacated during construction of the road.

10.5 Relief sought

- a. The Council seeks the following changes to the proposed project conditions:
- i. HH.3(d): The Heritage Management Plan shall be provided to the Heritage Unit Manager in addition to the regulatory function manager.
 - ii. HH.4(d): Should include specific reference to using methods that minimise vibration effects to built heritage.
 - iii. HH.5(d) and (e): In addition to pre- and post-survey reports, there must be active monitoring of structural condition during construction.
 - iv. HH.5(c) and (d): All (pre and post) survey and outcomes shall be provided to the landowner and Auckland Council.
 - v. HH.5(e): If any damage is caused and is made good, this shall be done in consultation with and receives approval by Auckland Council prior to works commencing.
 - vi. 31 Frank Grey Place should be recorded prior to its removal and relocated preferably to a Ōtāhuhu location. This building is likely a pre-1900 site.
- b. The Sea Scouts building, and the activities it provides for, have been the subject of lengthy discussion. The Council is concerned that there is a potential the building may not be re-occupied following construction. The Council asks for general repairs/maintenance to be undertaken and services to be connected to the building (wastewater) as mitigation for the loss of heritage values and amenity caused by the new road alignment. The Council is of the opinion that any new utilities/infrastructure to be connected to/through the Aotea Sea Scouts' building should be undertaken in consultation with Auckland Council Heritage Unit to take into account effects on the building and its scheduled extent of place.

11.0 Historic Heritage

- 11.1** The Council is not in disagreement with the overall archaeological assessment. As part of discussions and liaison with the NZTA, the Council has had the opportunity to provide comments on conditions of consent with specific reference to archaeological matters (both pre and post-1900) and these draft conditions are intended to address statutory outcomes for all forms of historic heritage, as defined under the Resource Management Act 1991. Specific statutory authority (to direct compliance) can be addressed as the detailed design progresses. The ultimate goal is to protect and enhance the historic heritage of the Auckland Region which includes the Manukau.
- 11.2** The Council does not support the use of the the Transport Agency Accidental Archaeological Discovery Protocol. The broader processes outlined in Sections E11, E12 and D17 (where applicable) of the Auckland Unitary Plan – Operative in Part Version are considered more appropriate as these provisions cover all land disturbance activities affecting historic heritage, not just archaeology.
- 11.3** This proposed route provides suggested remediation for leachate and other issues created by twentieth century industrial activities. The proposed route neglects to consider, as directed by section 6(f) of the Resource Management Act 1991, the effects across the entire historic heritage landscape of the Manukau Harbour. Principal to this world view is that the land, coastal marine area, mud flats, shell banks and water channels were all interdependent in the complex history of the harbour and the direct human interaction with this environment that occurred and the historic heritage sites that have been created. Similarly, the surrounding land, fresh water springs and bird and human interaction were entwined with this and the additional severance of this connection will not be a positive effect.
- 11.4** The scope and extent of this proposal is such that many of the natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures will be affected in some manner. The location and importance of some of these resources is as yet unknown but what is known (from traditional and documentary sources) is that the use and occupation of the Mangere Inlet pre-dates European arrival, then became an area of early trading between European and Maori. All historic heritage is of value and must be documented and recorded in order to inform the understanding and appreciation of our collective past for our collective future

11.5 Relief sought

- a. The Council seeks amendments to the NZTA's proposed conditions related to historic heritage features (including additions and amendments to the proposed Historic Heritage Management Plan).
- b. That the proposed conditions provide for the documentation of any historic heritage sites (both pre- and post-1900 periods) exposed during land disturbance activities. That the proposed conditions do not conflict with the archaeological values of scheduled buildings affected by this proposal.
- c. The Council seeks to ensure that the project provides for new research into all historic heritage along the route, and that this informs interpretation or educational opportunities at specific locations along the route.
- d. Ensure that the project provides the community with information at different stages of the project to enable the community to retain links with the water and the land.
- e. That the proposal provide different formats for interpretation for the entire route, as well as interpretation panels at viewing sites, and use of digital technology and web sites for the historic heritage landscape.
- f. That the Accidental Discovery Rules outlined in E11, E12 and D17(where applicable) of the Auckland Unitary Plan – Operative in Part Version are applied to any land disturbance activities required as part of the project.

12.0 Outstanding Natural Heritage

- 12.1** The proposal crosses two sites identified in the Outstanding Natural Features (ONF) overlay schedule of the Auckland Unitary Plan – Operative in Part. These are Hopua explosion crater and tuff exposure, and the Southdown pahoehoe lava flows including Ann's Creek.
- 12.2** While the location of the Neilson St interchange has been specifically designed to minimise further modification of Te Hopua tuff ring, some modifications as a result of the proposal will occur, including earthworks along the existing alignment of the Neilson St off-ramp and an encroachment to the side of a remnant section of the tuff ring as a result of the proposed connection between SH20 and the new road. The southern side of the tuff ring (outside of the identified ONF) will also be subject to excavations for a trench which will expose landfill materials and tuff deposits.
- 12.3** It is requested that mitigation be implemented in relation to these physical effects on the ONF by improving the state of the intertidal tuff exposure west of Onehunga Harbour Road. This should involve coastal foreshore clean up and restoration to improve the state and visibility of the tuff exposure portion of the ONF.
- 12.4** The proposal will also involve adverse effects on Te Hopua explosion crater ONF as a result of the new overbridge to the west of the feature. It is requested that removal of power pylons and undergrounding (or removal) of the transmission lines should be explored as a means of mitigating these visual effects.
- 12.5** The Council accepts that the Hopua crater is modified and that, generally speaking, the proposed works around the Neilson Street off-ramp will not contribute to significant further destruction.
- 12.6** Along the foreshore, the Proposal will generally avoid any remaining volcanological features, although the proposed boardwalks would cross over the basalt lava flows at Pikes Point.
- 12.7** An exclusion area at Anns Creek has been proposed to avoid encroachment of construction. The exclusion area takes into consideration most of the remaining Outstanding Natural Feature (i.e. the lava flow areas). However, the elevated road would essentially go over the top of the ONF with bridge piers to support it encroaching into the west and east areas of Anns Creek.,
- 12.8** The Council has significant concerns about the location of the proposal in the vicinity of the geological features and the potential damage the construction will cause.
- 12.9** The Council has particular concerns regarding the location of the road across the ONF at Anns Creek. The location and nature of the work is considered to be of a scale that cannot be mitigated. The technical information supplied with the application states "...the siting of piers supporting the elevated road in the west and east Anns Creek areas will need to consider the existence of lava flow features." However, the Council does not consider this action is adequate to protect this geological feature

12.10 Relief sought

- a. Given the Council's concerns about the location of the construction and its impact, the relief sought is a realignment of the route to avoid the Anns Creek ONF.
- b. Mitigation for adverse physical effects on Te Hopua is sought in the form of restoration of the tuff exposure portion of the ONF.
- c. Mitigation for adverse visual effects on Te Hopua is sought in the form of removal of power pylons and undergrounding (or removal) of the transmission lines across the feature.

13.0 Noise

- 13.1** In terms of construction noise and vibration, the Technical Report 8 (TR8) provided as part of the NZTA's application package provides a useful guide on the number of buildings that will be exposed to noise levels that are greater than the standard project noise limits. Section 6.7 of TR8 sets out the methods proposed for dealing with instances where the Construction, Noise and Vibration (CNV) project noise limits are exceeded. This section is very generic and contains no assessment or description of the effects that will be experienced by the receivers. A description of effects is necessary to ensure that any particular receiver can understand the potential effects that the current design is likely to have on them and also to ensure that the decision makers are fully informed on the degree of adverse effects that is likely to be generated.
- 13.2** TR8 provides only a very brief assessment of construction vibration effects and mitigation methods. TR8 does not address the potential for sensitive activities along the route that may be significantly affected by vibration below the project vibration limits. Such activities may include laboratories and businesses operating sensitive equipment such as microscopes, printing facilities, medical equipment and sensitive manufacturing equipment. The construction activities that are proposed could have significant effects on such activities including where the proposed project vibration standards are complied with.
- 13.3** TR8 does not provide a description of the effects of vibration on workplaces and residences so the nature and degree of effects on the receivers is unknown.
- 13.4** Section 9 of TR8 provides only a cursory summary of the methods that will be used to manage and mitigate CNV effects and states that the proposed Construction Noise and Vibration Management Plan (CNVMP) will contain the specific details. The lack of a CNVMP at this stage means that the specific methods and thresholds for implementing the mitigation and management of effects are largely unknown.
- 13.5** TR8 provides only a very brief description of the need for blasting activities. Blasting using explosives can generate significant adverse effects on receivers, even where the noise and vibration levels are compliant with the project standards. The noise and vibration effects of blasting on people, buildings and activities are largely undescribed in TR8.
- 13.6** The proposed designation conditions (in particular CNV.6) allows for the standard project construction noise and vibration limits to be exceeded where the Agency considers it impracticable to comply by simply submitting a schedule to the Council prior to the works responsible for the infringement(s) being undertaken. This process provides no certainty to the Council or any other stakeholder that the infringement is necessary and that the potentially significant effects that could be generated could not be avoided by other methods. The schedule process requires the application of a greater level of rigour (such as approval by the Council) to ensure that the Best Practicable Option (BPO) is adopted and that the noise levels are no greater than a reasonable level.
- 13.7** The assessment of effects in Section 4.3 of TR7 is limited to the assessment of the proportion of the population who would be "highly annoyed" by traffic noise. Without additional information, it is impossible to discern how the other (larger) percentage of the population will react to the noise effects. A full description of the effects will also help to determine whether the proposed ONV designation conditions will adequately avoid, remedy or mitigate the adverse noise effects.
- 13.8** TR7 is restricted in its scope to assessing the noise effects at Protected Premises and Facilities (PPFs) only. Section 3.4.1 of TR7 states that the scope of NZS6806:2010 is limited to assessing the noise effects at noise sensitive locations (PPF's) whereas the Resource Management Act 1991 requires the assessment of a broader receiving environment. The design and assessment has therefore been undertaken without specific regard to the wider receiving environment, including (but not limited to) parks, open space and the Waikaraka Cemetery.
- 13.9** The assessment of noise effects in TR7 is provided for each sector based on the design preferred by the current project team. However TR7 does not state that the currently preferred design will be the same as the final design. The proposed designation conditions (principally ONV.4) states that alternative noise mitigation designs may be used provided that no receiver is exposed to an increase in noise level such that

East West Link Submission Form

their 'Category' does not move upwards, (i.e. from A to B or B to C) or if the category does move upwards then the design must be consistent with the adoption of the BPO. The assessment and conditions do not deal with or prevent significant changes in noise levels arising from changes to the design for receivers that are well below the Category A limit and already in Category C, and do not prevent changes that could significantly increase the level of noise effects overall where that is deemed to be consistent with the BPO at the time of construction. Because the BPO includes the assessment of many factors including cost, the conditions allow for the final design to permit a significantly higher level of noise effects compared to the effects generated by the current design.

13.10 Relief sought

- a. In order to understand the degree of construction noise effects that will be experienced by all receivers, the applicant should provide a comprehensive description of noise effects for all receivers including those not defined as Protected Premises and Facilities, with additional specific details on the nature of the significant adverse effects that will be generated where the standard project noise limits cannot be met.
- b. The applicant should undertake a comprehensive evaluation of the activities in the existing environment to determine the proximity of any particularly sensitive activities (such as businesses operating sensitive equipment including microscopes, printing facilities, medical equipment and sensitive manufacturing equipment) and the magnitude of adverse construction vibration effects that is likely.
- c. The applicant should provide a comprehensive description of the methods that will be used to determine the nature of the receiving environment again immediately prior to works commencing in each area, and a detailed description of the methods that will be used to minimise the effects of construction vibration on sensitive activities as far as practicable
- d. The applicant should provide a description of the subjective effects of construction vibration at the levels that may be experienced by the various receivers, including where noncompliance with the project standards is expected.
- e. The applicant should provide a draft version of the CNVMP at this stage so that the receivers and decision makers can properly understand the methods that the NZTA is proposing to manage the effects of construction noise and vibration.
- f. The applicant should provide a more detailed description of the proposed blasting activities and should include the effects of any rock breaking, rock drilling and blasting in the noise and vibration assessments.
- g. The applicant should consider an improvement to the process described in CNV.6 to provide a greater level of rigour in the determination of the BPO for construction works that generate noise and/or vibration levels above the standard project criteria. Approval or certification of the schedule by the Council may be appropriate.
- h. The inclusion of an assessment of effects is a welcome addition to the relatively objective assessment required by NZS6806, (the absence of an assessment of the subjective noise effects arising from the implementation of a roading project has been criticised in the past on other projects). The assessment of the likely noise effects in TR7 should be updated, however, to include the additional categories as set out in the Miedema and Oudshoorn work, (%LA and %A) which will also provide (by inference) an insight into the percentage of the population who are not annoyed by the noise effects.
- i. TR7 should be updated to include an assessment of the likely effects of road traffic noise on any other receivers that could be sensitive to noise but that are not PPFs as defined by NZS6806:2010. This includes (but is not limited to) open space used for formal and informal recreation, Waikaraka Park, Waikaraka Cemetery and Gloucester Park. The assessment should include consideration of mitigation to minimise noise levels as far as practicable to those receivers.
- j. The applicant should consider how the magnitude of operational noise effects that is considered by the decision makers for the current design can be 'capped' so that any changes to the design do not generate a greater level of adverse effect.

14.0 Social Impact

- 14.1** The Council is in general agreement with the social impact assessment but has recommended that several recommendations and opportunities identified in the assessment be translated into conditions of consent to ensure that impact on culture and identity, such as appropriately identifying significant cultural sites through artwork, signage and landscaping.

Relief sought

- a. The Council seeks amendment to several of the draft conditions including ensuring information about the project during the construction phase is communicated to people with impairments or those with English as a second language. Also sought are some suggested amendments to the Community Liaison Group to ensure that as many people within the community are captured when information about the project is disseminated.
- b. The Council seeks for the NZTA to work with elected members, community groups and the public generally to put in place appropriate mitigation to minimise the impact of construction on the community.

15.0 Air Quality

- 15.1** The Council does not consider there are any major issues with respect to air discharges associated with the project. However, despite not being a matter for consent, conditions of consent relating to the control of dust from construction (so that any discharges remain in compliance with the General Permitted Activity Standards) have been proposed as part of the Contaminated Land Discharges consent application. These proposed conditions include the submission of a Construction Air Quality Management Plan (CAQMP).
- 15.2** The inclusion of these proposed conditions as part of the package of consents is appropriate and necessary for ensuring that air discharges are adequately controlled and compliance with the air discharge General Permitted Activity Standards is maintained.
- 15.3** The Technical Report 9 submitted as part of the NZTA's application recommends a range of controls, mitigation measures and contingency measures for the potential discharges of dust and odour from the EWL construction in section 8 of the report. Many of these recommendations are included within the four recommended conditions. A key recommendation is the preparation of a CAQMP to detail how air discharges are to be effectively minimised over the course of the works.

15.4 Relief sought

- a. The Council seeks some amendments to the proposed conditions of consent, particularly in relation to the Construction Air Quality Management Plan (CAQMP) to ensure that the dust monitoring recommended by the Air Quality Report is specified as a bottom-line for the project.

16.0 Parks and Open Space

The Council has identified a number of concerns in relation to the impact of the proposal on Parks and Open Space. The commentary below has been set out to deal with issues in relation to individual parks and discrete areas and the relief sought for each particular area.

16.1 Taumanu Reserve – Orpheus Drive

The proposal does not seek to reclaim land in this area and therefore minimal space is available for the shared path which will be adjoined by a series of parallel roads which rise above the grade of the shared path and will dominate the route.

Relief sought

- a. The Council seeks the area to be provided with a shared path which is also wide enough to incorporate an appropriate landscape treatment including planting along the landward side of the shared path adjacent to Taumanu Reserve.
- b. The Council seeks the proposed boardwalk adjacent to Taumanu Reserve be replaced by a shared path inside the existing coastal edge.

16.2 Aotea Sea Scouts and Sea Scout Hall

During construction, the hall will not be usable for safety reasons. The proposal has potential to render the building unusable as it will become inaccessible to vehicles and without adequate nearby car parking and use is limited due to the servicing of the building. The long term viability of the Aotea Sea Scouts in this location is unlikely to be viable due to the severance from Gloucester Park South by the EWL on/off ramp and due to a lack of car parking. The Council notes that a number of discussions have occurred between the NZTA and the Aotea Sea Scouts, and supports and encourages the NZTA's ongoing engagement with the scouts.

Relief sought

- a. NZTA is to provide plans which show the extent of available car parking following construction and what is currently available.
- b. If the building is to be relocated, this must be done in consultation with the Council with NZTA to cover all costs including regulatory, consultation and process costs.
- c. If the Sea Scouts building remains in situ, NZTA is to investigate the feasibility of undergrounding the transmission tower and servicing of the building to enable sufficient car parking for repurposing of the building.

16.3 Gloucester Park (North and South)

The temporary occupation of approximately 9,932m² of Gloucester Park (North and South) for approximately 30 months reduces the area of open space available for public use, enjoyment and amenity. In addition, the permanent acquisition of 5,444m² of reserve land in this location reduces the area of open space available for public use and enjoyment.

The operation of Gloucester Park should be considered in tandem with Waikaraka Park, as the removal or degradation of one facility puts corresponding pressure on the other. As is outlined further in this section, the proposal will affect the Council's ability to deliver planned sports fields at Waikaraka Park this year. To mitigate this loss, the Council seeks that two full sized sports fields, car parking and entry works be constructed within Gloucester Park North prior to the project works commencing in order to meet the required capacity for the area.

The ecological improvements to Gloucester Park South are supported, including visual strengthening of the tuff ring and treatment of stormwater runoff. Access from Onehunga Port to Gloucester Park South and associated pedestrian links north of this area should be strengthened to support connection to the Onehunga Port development. Reserve trees (mainly pohutukawa) will be impacted by the proposal though the extent of their removal is unclear.

Relief sought

- a. The NZTA is to build and fund two sport fields, associated facilities, lighting and carparking at Gloucester Park North and make this facility operational prior to the occupation of Waikaraka Park. This is required to offset the construction related effects and inability of council to deliver planned sports fields at Waikaraka Park during the construction phase. The NZTA is to liaise with Council to determine type and nature of the sports fields.
- b. The NZTA is to minimise the amount of land acquisition to maximise the area available for active sport use and park development.
- c. The Council seeks pedestrian links to the area be retained and enhanced wherever possible, such as links to Onehunga Port, Gloucester Park North and South and the walking/cycling network.
- d. A ball fence in Gloucester Park North is to be constructed to prevent balls travelling from the park onto State Highway 20. The final design of the ball fence is to be visually as 'light' as possible. The design should be located and finalised with the Council prior to construction.
- e. Landscape design should involve a consultation and approval process with the Council.
- f. The NZTA should undertake all practical measures to retain the mature trees impacted by the proposal or alternatively relocate these within an agreed location within the park or surrounding areas

16.4 Galway Street extension and pedestrian crossing points

The proposal to extend Galway St to connect to the EWL will preclude access by pedestrian and cyclists between the 1.8m footpath on the northern side of the EWL to the Onehunga Port and on to Orpheus Drive. It is unclear if a pedestrian crossing point will allow access between the north and south footpaths at the signalised intersection at Galway St. There is a general lack of detail about pedestrian crossing points along the alignment. The Maungakiekie-Tāmaki Greenways Plan indicates desired pedestrian routes. It is important that the proposal does not preclude the Council's ability to deliver these projects and facilitates them where possible.

Relief sought

- a. NZTA is to accommodate a crossing point to enable pedestrians to cross from Galway St to the commuter cycleway on the coastal side of the EWL.
- b. NZTA is to clarify crossing points on all plans to enable an accurate picture of the walking/cycling network incorporating the Council's desired connections in the Maungakiekie-Tāmaki Greenways Plan.
- c. The permanent loss of esplanade reserve land is not compensated for by temporary boardwalk structures in the coastal marine area therefore NZTA is to work with the Council to identify works elsewhere upon affected land to address the effects.

16.5 Waikaraka Park

Approximately 31,000m² of Waikaraka Park South will be temporarily occupied during construction. The Council has budgeted and planned installation of 3 sports fields within this area with construction planned for 2017. Due to the proposal, sports field construction and the benefits to the community will be delayed and the land will not be available until 2022 or beyond. NZTA plans to reinstate Waikaraka Park but this is limited to open space directly affected by the proposal. The Council is not satisfied that this is sufficient to mitigate or offset the loss of planned sport field provision at this location which were intended to be constructed in 2017.

The acquisition of approximately 12,000m² of reserve reduces the area of open space permanently available for public use and enjoyment and the ability of the Council to provide for current and future sport and recreation needs. The permanent acquisition of land for the road will reduce the ability for the Council to deliver three planned sports fields. Only two would fit on the area left following land acquisition for the proposal. Potential soil contamination due to the construction and concrete batching plant could have implications for its intended future sport and recreation use. Parking for Waikaraka Park on Captain Springs Road is also affected.

Relief sought

- a. Upon abandonment of the Waikaraka Park construction area NZTA is to construct 2 artificial sports fields including lighting and supporting facilities at Waikaraka Park. Alternatively, if the land take is reduced adequately then three sports fields, "natural" sand and drainage profiles to be built using an approved subcontractor, including associated lighting and irrigation.
- b. During construction of the EWL, NZTA is to provide two consented sand carpet fields within the general area. The location(s) to be determined, but Gloucester Park North is the preferred option at this time.
- c. NZTA is to rehabilitate the construction yard occupied land to ensure land is suitable for recreational contact sport.

16.6 Waikaraka Cemetery

The proposal will result in adverse physical and visual severance of the cemetery from the coastal edge and visual and acoustic impacts on visitors to Waikaraka Cemetery both during construction and permanently.

A planted bund is proposed; however it is unclear whether this will sufficiently mitigate the acoustic and visual impacts on Waikaraka Cemetery. A wall set back in the planting and possibly vegetated represents a potential compromise. Further information and discussion is needed around the treatment of the Waikaraka Cemetery southern interface with the EWL to provide sufficient visual and acoustic mitigation. Integration of the acoustic bund and the pedestrian overbridge should be considered.

The function of southern Alfred Street needs to be considered as an access node which will serve the cemetery and provide the gateway connection for the public to the coast via the pedestrian overbridge. This requires a quality urban design and landscape approach that would address car parking requirements, public facilities and function. Parking and/or road function upgrades within the cemetery land may be appropriate to mitigate the loss of informal car parking resulting from land acquisition and modifications along the southern edge. A number of semi mature pohutukawa will need to be removed as a result of the proposal.

Relief sought

- a. The Council requests that integrated visual and noise mitigation be implemented along the length of the boundary with the cemetery in consultation with the Council.
- b. Redesign the pedestrian bridge to achieve less occupation of the Alfred St road frontage of the cemetery and provide more opportunity for appropriate development and treatment of this area as an access node for the coastal walkway and cemetery, including replacement parking and picnic areas. This is to be undertaken in consultation with the Council during the design phase and linking to the Waikaraka Park Masterplan. Incorporation of the pedestrian bridge ramp area with the bund should be considered.
- c. Parking and/or road function upgrades with the cemetery are sought to mitigate the loss of informal car parking within the cemetery which will result from the proposed land take and modifications along the southern edge.
- d. The semi mature pohutukawa that require removal should be relocated within the surrounding area and the number of trees removed kept to a minimum.

16.7 Reclamations

The reclamations are not exclusively designed from an open space recreation perspective, therefore the walkway and boardwalk alignments and their location appear arbitrary. The boardwalks especially are shown with overly long linear alignments. This is detrimental to user experience and creates personal safety problems. There is also the issue of high operational costs for boardwalks compared to walkways. Rationalisation of boardwalks and footpaths is required.

Design and landscaping within the reclamations needs to balance functional, ecological and open space outcomes. The proposal may place additional demand upon Taumanu Reserve parking spaces because of limited vehicle access on the coastal side of the network. It is uncertain if the number of access points to the proposed reclaimed land and open space network will be sufficient, or if the resultant access points will provide required car parking and necessary ancillary design treatment.

Relief sought

- a. The NZTA is to redesign the reclamations to provide improved access and open space function with a contiguous land based walkway. Where boardwalks are required, they should be designed and aligned to maximise user experience and minimise personal safety risks in accordance with CPTED principles.
- b. The reclamation landscape and engineering design be undertaken in consultation and agreed with the Council prior to construction.
- c. Address access design and parking requirements to ensure sufficient and frequent provision for access to and from the coast is available for pedestrians, cyclists and Council staff/maintenance contractors.

16.8 Southdown Reserve

There is lack of clarity over land ownership adjacent to Southdown Reserve, and whether it will remain in NZTA ownership or be transferred to the Council. Council seeks to have input to ensure that it functions compatibly with Southdown Reserve. It is unclear what the extent of works in Southdown Reserve are or why they are necessary.

Relief sought

- a. The NZTA is to consult with the Council on the remediation of Southdown Reserve affected by the NZTA's proposed work on adjacent land or remove this from the works area.
- b. The Council is consulted on the design of the adjacent land to ensure that a positive interface with Southdown Reserve is designed, which incorporates CPTED principles.

16.9 Mangere Inlet Coastal Walkways including Mangere Foreshore West and East Walkways

The proposal removes the existing esplanade reserve in many locations and as proposed mitigation, replaces it with boardwalk across the water/tidal flats or a path over reclaimed land. This has the potential to expose users to the elements more frequently with little shelter from any vegetation or none at all across the boardwalks. Personal safety along these long stretches of boardwalk is also of concern with very few exit points available in some locations. The proposal is not considered to be of equal open space value compared to the esplanade reserve which will be lost.

Relief sought

- a. The NZTA is to provide foot paths, commuter cycling, and shared paths to better replace the open space values lost by the take of esplanade reserves. Detailed plans to be reviewed and approved by the Council prior to construction. The NZTA to also provide upgrades elsewhere as compensation for open space values lost by the take of esplanade reserves.
- b. Incorporate linkages between walkways and cycle networks.
- c. All coastal structures are designed to achieve long-term durability and low maintenance requirements. The Council is to review design specification of all structures to be vested in the Council.
- d. Ensure all recreational and commuter cycling/walking paths have connections to or don't preclude future connections to existing networks or future networks e.g. Maungakiekie-Tāmaki Greenways Plan.
- e. Cycle facilities (including secure parking) should be considered at key locations and provided by the NZTA in consultation with the Council.

16.10 Access to Mutukaroa Regional Park (Hamlin's Hill)

The proposal at Sylvia Park Road/Great South Road intersection requires pedestrians and cyclists from the coastal cycle/walkway to cross multiple traffic lanes to access the regional park. An alternative is a less direct route along Hugo Johnston Drive which requires crossing Great South Road further north. The proposal creates improved pedestrian and cycle access along Sylvia Park Road but does not create direct access across Sylvia Park Road. The Council submits that there should be more direct pedestrian/cycle access to Mutukaroa Regional Park.

Relief sought

- a. That there should be more direct pedestrian and cycle access across, particularly from the southern side of the EWL, to Mutukaroa Regional Park. This may involve an underpass or alternatively an elevated shared path.

16.11 Southern Coastal Link

There are Council plans to continue an existing coastal walkway/cycleway southwards from Anns Creek and connect around Mangere inlet and the connection over the railway line is a key access point. The design of the new underpass linking Hugo Johnston Drive and the 3m shared path along the proposed Anns Creek bridges will disable the existing access across the railway line bridge and preclude future connections across the railway line to the Council proposed coastal walkway.

The existing walkway also has a key link to Hugo Johnston Drive which is proposed to be purchased by NZTA (1018-AI Lot 19 DP 129768). It is unclear why NZTA need to permanently acquire this entire parcel as the majority of it is unaffected by the road and the 3m shared path will still connect from Hugo Johnston Drive.

Relief sought

- a. The Council seeks that the configuration of the cycle and pedestrian paths in the vicinity of Anns Creek mouth and the railway bridge facilitates future connections to the south linking with any future cycleway along the coastal side of the rail corridor and Favona on the southern coast of Mangere inlet.
- b. The Māngere-Ōtāhuhu Local Board supports the completion of the Norana walkway through Favona, and around the Mangere Inlet that includes going through, Ōtāhuhu, Onehunga and looping back through Mangere Bridge. The Board desires the walkway to be included in this project as it is an important catalyst to complete the entire walkway around the Mangere Inlet.
- c. The pedestrian connection to Hugo Johnston Drive is retained and enhanced.
- d. The NZTA is to upgrade the rail bridge and connections. These works may be accepted as partial mitigation for the adverse effects of permanent loss of esplanade reserve land and walkways to be taken.

16.12 Ōtāhuhu Creek

The proposal brings the pedestrian/cycle path into Deas Place via a residential property to be taken which is preferable to the existing access in terms of visibility and CPTED. This allows (potentially) rationalisation of existing unsafe access or development of walkways to increase use and safety. The local board through the Maungakiekie-Tāmaki Greenways Plan has aspirations to extend the walkway network along the extensive esplanade reserve network in this locality. The Council wishes to ensure that pedestrian access is available under the Ōtāhuhu Creek SH1 Bridge on both sides or alternative pedestrian access is available to ensure future connections are possible.

Relief sought

- a. NZTA to ensure that the design is future-proofed to provide for connections to the esplanade reserves on both banks of Ōtāhuhu Creek under the SH1 Bridge.
- b. The Council be consulted with respect to remediation and planting plans.

16.13 Artwork/signage

The Council generally supports the NZTA's Urban and Landscape Design Framework in relation to signage and artwork however there is little information about what signage and artwork is proposed.

Relief sought

- a. The Council to be involved in the development and implementation of the Urban and Landscape Design Framework and development of the signage masterplan associated with the boardwalk / walkway / cycleway areas.

16.14 Cost considerations

The EWL will result in additional expenditure by the Council for the ongoing maintenance of the boardwalks, reclaimed land/stormwater ponds and additional open space areas, which is not currently budgeted for in the LTP. Asset ownership will be divided between NZTA, the Council and Auckland Transport but has yet to be determined so it is difficult to understand the financial implications for the Council.

For cost effective maintenance to be undertaken by the Council's contractors, regular and sufficient maintenance points for vehicles must be provided. Because the proposal's plans are high level this has not been addressed at this stage. There does appear to be many small pockets of green space that will not be functional open space and but will need to be maintained.

The design of the open space can affect maintenance costs and visitor experience. Therefore the Council should be consulted in the detailed design of landscaping aspects (hard and soft) to ensure cost effective maintenance is achievable.

The Council has yet to receive sufficient information in relation to the full impacts of the project in order to determine the scope and scale of future maintenance obligations and associated costs.

Relief sought

- a. Conditions that provide the opportunity for the Council to review and approve detailed design for planting/landscape plans and engineering plans (in reserves, land to vest, streetscape) and sign off of new assets to be vested in the Council. The maintenance period for NZTA is to be a minimum of two years for 'landscape' treatment and five years for 'restoration' planting such as the stormwater ponds/wetland areas. The maintenance frequency and specification should be the same as that of the Council's maintenance standards for equivalent areas.
- b. The NZTA to provide regular and adequate maintenance access points to all Council maintained areas.

16.15 Land acquisition

Land acquisition should be reduced wherever possible. The extent of land acquisition will impact the ability of the Council to deliver its projects particularly at Waikaraka Park and Gloucester Park North. The number of tree removals and final finished road/park interfaces will be significant factors in determining the extent of the impacts on the parks overall.

Relief sought

- a. NZTA to undertake design and provide updated land acquisition plans that reduces the amount of land take to limit the impact on the parks.
- b. The Council seeks confirmation from NZTA that the land take is minimised as much as possible to limit the impact on reserves.

17.0 Watercare Infrastructure

17.1 Watercare's concerns primarily relate to the acknowledgement, accommodation, protection and relocation (where appropriate) of Watercare assets that may be affected by the proposed NZTA works. Watercare operate several vital water and wastewater transmission pipelines through the proposed NZTA designation, as well as a number of local connections and other minor assets which will need to be addressed. Accordingly, Watercare wish to have these assets appropriately provided for via consultation and agreement on proposed options when detailed design and construction take place. Furthermore, Watercare do not wish to be burdened with the need to gain NZTA s176(1)(b) approval to access and maintain Watercare assets.

17.2 Watercare have identified a number of sector-specific concerns and have previously discussed these with NZTA. These arose via identification by Watercare's asset protection team of potential conflicts between the proposed EWL alignment and existing Watercare assets.

- Onehunga Harbour Rd – local connections in grade separated section of road
- Hunua 1 watermain at Sylvia Park Rd/Great South Rd intersection
- Sylvia Park watermain
- Hunua 3 watermain
- Hunua 4 watermain
- Eastern interceptor - Westfield Siphon

17.3 Relief sought

- a. Watercare proposes a number of draft conditions to address concerns and these have been provided to NZTA. These are included below. Furthermore, a draft agreement between Watercare and NZTA is being developed to provide greater detail and to address concerns which are not suitable as conditions.
- b. Watercare Draft Proposed Conditions
 1. The requiring authority (NZTA) shall prepare and implement a Network Utilities Management Plan. The plan shall be prepared in consultation with the relevant infrastructure providers who have existing network utilities that are directly affected by the Project. The purpose of the plan is to ensure that the design and construction of the Project takes account of and includes measures to address the safety, integrity, protection and where necessary the relocation of existing network utilities.
 2. In addition to the matter set out in Condition 1 above the Plan shall include procedures methods and measures to manage effects of the construction works on the following Watercare Assets:
 - Onehunga Harbour Rd – grade separated section local connections
 - Hunua 1 watermain at Sylvia Park Rd/Great South Rd intersection
 - Sylvia Park watermain
 - Hunua 3 watermain
 - Hunua 4 watermain
 - Eastern interceptor Westfield Siphon

The Plan shall include the procedures, methods and measures that demonstrate how construction works will meet safety procedures required by Watercare for works within the vicinity of its assets and; Details of areas within which additional management measures are required.

 East West Link Submission Form

3. In the period before construction begins on the Project, the following activities undertaken by network utility operators will not prevent or hinder the Project, and can be undertaken without seeking the Requiring Authority's written approval under section 176(1)(b) of the RMA:
 - a. Operation, maintenance and urgent repair works of existing network utilities;
 - b. Minor renewal works to existing network utilities necessary for the on-going provision or security of supply of network utility operations;
 - c. Minor works such as new service connections;
 - d. Upgrade and replacement of existing network utilities within the same location with the same or similar effects as the existing utility.

4. The requiring authority shall consult with Watercare and must enter into an infrastructure agreement ('Entrusted Works Agreement') satisfactory to Watercare (acting reasonably) that, amongst other things:
 - a. identifies potentially affected Watercare assets,
 - b. details how affected Watercare assets are to be addressed,
 - c. ensures Watercare assets will be protected and function maintained to Watercare's satisfaction
 - d. maintains Watercare's continuing access and operation of its affected assets
 - e. addresses the matter of betterment (if any) and how the costs are to be apportioned.
 - f. agrees contractor(s) to undertake any works on Watercare's assets.

5. Advice note:
The Requiring Authority is required under the Water Supply and Wastewater Network Bylaw 2015, to obtain approval from Watercare before works commence within close proximity to Watercare assets.

18.0 Local Board Views

18.1 Māngere-Ōtāhuhu Local Board

The Māngere-Ōtāhuhu Local Board (the Board) supports the proposed East-West Link development in principle, but wishes to note the following the Board view and relief sought.

The Board also supports the general objective of this development, such as, improved access ways and facilities between SH20 and SH1 along the northern edge of the Mangere inlet and surrounding areas, including the Princes Street junction (Sheet 6 - reference to NZTA EWL package for consents maps) for vehicles, cyclists and pedestrian safety.

The East-West Link Connection development aligns with key transport priorities set in the Māngere-Ōtāhuhu Board Plan's outcome "A well-connected area":

- improving connections in our area through safer streets, quality public transport, cycle ways and greenways.
- to live in a place that is easy to travel around... This is important to the well-being of our community... crucial to delivering our economic aims of developing tourism and growing businesses in our area.
- The linkages project complements the bus-rail interchange and will make movement between key locations easier for pedestrians and cyclists, too.

18.1.1 Submission

East West Link Submission Form

- a. Regular contact:** The importance of regular contact with the Board can only enhance this development, as it is an opportunity for the Transport Authority and Auckland Transport to gain precious insight on:
- i. local stories, history, and designs to inform and shape the development with local influences.
 - ii. Improving local acceptance of the planned development through engagement led by the board(s) highlighting the benefits and opportunities to the areas affected.
- b. Avoid reclamation:** This is a major development along the northern coastline of the Mangere Inlet that will impact on precious and sensitive areas in this area. The board request that best practice is adhered, to avoid reclamation of the coastline, keeping its integrity and minimalizing any interruption to the area's ecological system, fishing and natural life characteristics.
- c. Specifically support wetlands:** As an approach to protect the integrity of the inlet's natural features, through managing stormwater discharge, the Board supports wetlands to ensure stormwater discharge is diverted from entering the Mangere Inlet and Manukau Harbour.
- d. Mangrove removal:** Anne's Creek Estuary consists of mangroves. The Board seeks:
- i. That reclamation best practice is adhered to by avoiding unnecessary reclamation and minimising reclamation that affects the area's ecological system.
 - ii. That best practice advice for managing mangroves ensures it does not become the dominant vegetation in the ecological system.
- e. Replace the old Mangere Bridge as a recreational facility:** The Board supports the current purpose of the bridge and does not support full vehicle use. The Board calls for the work programme for this project to be implemented now. A bridge is important to both Mangere Bridge and Onehunga businesses as it draws locals from near and afar to enjoy this pathway, and supporting patronage to local cafés and shopping areas. To enhance this experience the Board calls for improved visibility (more lighting), and better footbridge access for walkers and cyclists.
- f. Princes Street, Ōtāhuhu, improvements:**
- i. Princes Street interchange – the Board requests additional safety features to be considered and implemented, for pedestrians and cyclists between the portion of Princes Street between, Frank Grey Place and Albert Street. The new layout needs to be friendly for pedestrians and cyclists to confidently and safely use this stretch of road.
 - ii. The local shops on the corner of Albert Street and Princes Street are important for locals. Safe access and exit requires to be considered by the road designers. This request also requires the same principles to be applied for the Ōtāhuhu Gurudwara worship facility on 118 Princes Street (opposite the shops).
 - iii. Development like this one benefits many communities outside the Board area. However, local residents request that better meaningful engagement happens to identify how new road networks may impact on local neighbourhoods, like Ōtāhuhu's Luke Street and Atkinson Avenue, and roads near the airport road corridor. These areas are experiencing increased traffic flow impacting negatively on local's ability to go about their normal business.
 - iv. Mitigation options could include traffic lights or alternative routes can be considered through Frank Grey Place (south end) or an over bridge over the motorway linking Avenue Road.
- g. Complete the Favona walkway:** A major focus for the Board is to implement and complete the Norana walkway through Favona, and around the Mangere Inlet that includes going through, Ōtāhuhu, Onehunga and looping back through Mangere Bridge. The Board believes this will meet several transport outcomes and strategic documents like, the Auckland Plan's integration of modes of transport, improved pedestrian and cycle routes to name a few.
- The Board wants this walkway to be included in this development to leverage different sources of funding including Growth Funding to complete the walkway around the Mangere Inlet.

h. General:

- i. Social impact: The Board would like to request information on the predicted increase numbers of vehicles, and how fumes from vehicle's emissions and noise pollution have on the local community, when this development is operative and its construction phase.
 - ii. Previous resolution: The Board would also appreciate the opportunity to remind the Transport Authority the board adopted at its August 2013 business meeting resolutions that included key aspects that is relevant now for instance:
 - Joint meetings with the Maungakiekie-Tāmaki Local Board to discuss the common issues – to (re)commence.
 - Consider the Māngere-Ōtāhuhu Area Plan to inform this development.
 - Request social impact reports – noted (8a).
 - Include rail linkages and heavy freight movements
 - iii. Scout's building: The Board seek further advice on how best it can support this facility, in context to the upcoming development to ensure that the building's historical elements are preserved.
- i. Finally, in the event that submitters are given an opportunity to verbally present its submission, the Board chair and/or board representatives welcome this opportunity, to share its position on the East-West Link Connection.

18.2 Maungakiekie-Tāmaki Local Board

Under the Local Government Act 2002 Amendment Act 2014, local boards were tasked with enabling democratic decision making by, and on behalf of, communities within the local board area; and to better enable the purpose of local government to be given effect to within the local board area. In particular meeting the current and future needs of communities for good quality local infrastructure, local public services and performance of regulatory functions in a way that is most cost-effective for households and businesses, efficient and appropriate to present and anticipated future communities.

Our local board area includes the communities of Onehunga through to Glen Innes. We note that the East West Link runs through Onehunga, Sylvia Park and Mt Wellington which are all within our local board area. It is from this basis that we make our submission.

Thank you for the opportunity to submit and we look forward to the opportunity to speak before the Board of Inquiry as part of the Council submission. The Maungakiekie-Tāmaki Local Board respectfully submits:

- a. That while we **support the need** for the East West Link and acknowledge that this is a programme of national significance given the economic impact with this area contributing 7.5% approximately to Auckland's GDP, we have concerns about specific parts of the project which we would like to see addressed. We also are concerned at the costs of this project and wish to state that there be transparency regarding expenditure for this project.
- b. Community voices and engagement - We have been consistent that our communities voice be heard throughout this process and once again request due consideration to submissions from The Onehunga Enhancement Society, Onehunga Business Association, Mangere Bridge Residents Association and local community groups as well as local residents who will be more directly affected by this project. We also note the specific concerns regarding the Aotea Sea Scouts group as well as the heritage building they currently occupy. In our feedback to NZTA dated 15 July 2016 we noted our concerns that the consultation material did not always make it easy to determine levels or scale, meaning that it was difficult to determine the true impact of some of the design's features. Those concerns still exist and it would be good to see visuals of what the East West Link looks like in front of the Aotea Sea Scouts building and the Landing and the area where the underpass is located.

East West Link Submission Form

- c. Better connection from town to sea** - In recent years we oversaw the remediation (through creation of Taumanu Reserve) of the effect of the 1977 development of State Highway 20 that cut off Onehunga township with the Manukau Harbour. We are concerned that the East West Link project is contributing to that severance and would like to see a better connection between the Onehunga port and Onehunga township in the final design. Design options that should be explored must include tunnelling rather than limit to the cut and cover design proposed. The project must deliver a seamless connection to the port.

The underpass to connect to the port area requires smart urban design that supports the local board's strategic imperative to build a safer community. There are concerns about anti-social behaviour increasing as a result of not improving this area once the East West Link is built. The underpass next to the 'New Old Mangere Bridge' and connection to Onehunga currently enables unsafe behaviour and these are safety issues which are likely to be amplified by the East West Project so they need to be addressed as part of the design. A Crime Prevention through Environmental Design (CPTED) approach must be adopted.

- d. Port development** – it is imperative that the project does not undermine the future of a 'Wynyard Quarter-style' development at the wharf. The local community have high aspirations for the redevelopment of the Onehunga port raising the profile and liveability of the Manukau Harbour. They were looking forward to and expect the Council to deliver on the commitment to redevelop the wharf. This redevelopment has been delayed significantly by this project. There needs to be easy access from town centre, Dressmart and the lagoon to enable the community and visitors to maximise the social and economic benefits of the port and harbour area. The combined cycle, pedestrian and vehicle connection from residential areas and town centre to the port must be at the maximum space technically possible and be aesthetically pleasing
- e.** NZTA's process to **purchase the wharf** lacks transparency and has given a perception that due process wasn't followed. This further undermines the aspirations of the community and this places at risk any trust that the promised development of the wharf and harbour area will actually occur.
- f. Development of Onehunga** – The East West Link should support and enable the local board's aspirations for Onehunga. Significant growth is expected in the local board area. This and other developments must provide high quality infrastructure that will meet the needs of the growing community. In addition to providing infrastructure for our residents. We also see Onehunga as a destination township that provides a place for recreation activities (wake-boarding, skate-park, speedway, Taumanu Reserve, dog walking etc...), high quality hospitality and retail. The East West Link project should enhance the development of the area, support the town centre, wharf and harbour area while enabling the industries efficient connections to suppliers, customers and workforce.
- g. Mutukaroa Regional Park (Hamlin's Hill)** -We would like to see better connection for walking and cycling access to Mutukaroa. We want to ensure that what is proposed in Sylvia Park/Mt Wellington area with walking and cycling is the safest option for all concerned.
- h. Compensation for loss of recreation and parks land** - Our parks and other local assets will be significantly affected. We demand that the NZTA and the Maungakiekie-Tāmaki local board establish a joint working group on the redevelopment and mitigation of the adverse effects of the East West Link project on the local area. Approximately 12 hectares of Council land will be used for the East West Link and we will be seeking commensurate mitigation from the NZTA.

Our requirement is that **compensation** needs to come back to the Maungakiekie-Tāmaki Local Board who will make the decision on asset redevelopment and will expedite the reinvestment into community infrastructure and where possible, ensure this is occurs is in parallel to the EWL project implementation and done in consultation with mana whenua and local community stakeholders.

- i. Futureproofing** – the project needs to be designed with the future in mind and not be limited to current routes to keep costs down which may not prove sustainable or cost effective in the long term. The

 East West Link Submission Form

- current design needs to futureproof mass transit options and incorporate a MRT connection within the scope of the project. It also needs to explore proposals such as building a second bridge as per submissions from The Onehunga Enhancement Society and the Onehunga Business Association.
- j. There are claims from some sources that the project will increase traffic in some parts of the town centre. The East West Link must result in **less traffic** through the Onehunga township by diverting through freight and other traffic away from the town centre.
 - k. We demand that the impact on local community **during construction** of the project is appropriated mitigated. NZTA needs to work with the local board, Onehunga Business Association and local community groups to identify appropriate measures to mitigate the impact during all phases of the construction.
 - l. **Environmental** – We want to see environmental impacts appropriated mitigated and use opportunities presented by this project for enhancement of some of the natural features in this area that have been neglected:
 - i. Although Te Hopua Tuff Ring has been ‘dug into’ for past roading projects we should look to protect and maintain what is left. We are interested in how declamation can assist with this aspiration as one of the outcomes of this project.
 - ii. We support the extension of Taumanu Reserve for the community to enjoy whilst protecting and enhancing the Outstanding Natural Features (ONF) nearby.
 - iii. We support the construction of a boardwalk alongside the coastal marine area to improve connectivity and amenity. However, the design needs to ensure the ecological effects are mitigated and enhance natural assets.
 - iv. Anns Creek will be significantly affected with the proposed viaduct. We are aware that is an area of neglect from previous Councils, however we request consideration be given to reviewing the proposed viaduct location to one that has lesser impact on the environment there.
 - v. That we support the use of wetlands as an approach to protecting the Manukau Harbour however we support the option that will best accommodate risks posed by climate change and rising sea levels. We support best measures being used to improve treatment of stormwater and leachate.
 - m. The **Sea Scouts building** is to be maintained in accordance with its heritage status. Relocating this building to Taumanu Reserve is an ideal option, and along with the **Manukau Sailing Club** we can look to create a water-based activities precinct at Taumanu that incorporates these facilities. We look forward to the East West Link project supporting this vision and providing resources for it as part of a mitigation package.
 - n. The transmission lines and **pylons** create visual pollution in the harbour. We would like to see these pylons removed and power cabling to be installed in an environmentally sensitive manner.

18.3 Puketāpapa Local Board

The Puketāpapa Local Board has long had a desire to see the end of the visual pollution created by the transmission lines and towers that cross the Onehunga area and enter the Puketāpapa Local Board area from the East. The board sees the East West link as an opportunity to further this desire and wishes to recommend that the project deliverables include the undergrounding of the transmission lines and towers, in particular the Henderson - Otahuhu, Penrose - Mount Roskill and Mangere - Mount Roskill lines.

The Puketāpapa Local Board would appreciate the opportunity to speak before the Board of Inquiry as part of the Council submission.

19.0 Auckland Urban Design Panel Recommendations

AUCKLAND URBAN DESIGN PANEL



RECOMMENDATIONS

Confidential Recommendations - Auckland Urban Design Panel

Project:	East West Link
Location:	135 Albert Street, Level 14, Meeting Room 8
Date:	Monday 6 th March 2017
Time:	11:00-5:00pm
Members:	Dr Lee Beattie (Chair), Tracy Ogden-Cork, Dr Diane Menzies and Will Thresher
Council Specialist's	Graeme McIndoe (urban design), Stephen Brown (landscape)
Planner:	Lindsay Wilson

Introduction

The Panel thanks the Applicant for their presentation and their responses to the previous Panel's recommendations. However, the Panel still has fundamental concerns about severance of the existing and potential future urban fabric from the coastline as a result of the proposal which will create a barrier. A key issue is the long-term implication for Onehunga and its ability to regenerate, for instance from industrial to residential/ mixed use.

Western Section: Onehunga Bay to Captain Springs Road

Connectivity

The Panel has concerns about the quality of the urban connectivity between Onehunga Wharf and the coastline with Onehunga Town Centre and beyond. The Panel is concerned that the current proposal reinforces and aggravates the level of disconnection between the Wharf, the coastline and the town centre. Any proposals (now or in the future) should be aiming to enhance the integration of Onehunga with the coastline. In this respect, this includes the urban form, street connections, at-grade pedestrian and cycle connections, potential development sites and amenity and open space. This also includes the land east up to Captain Springs Road and including Waikaraka Park and Cemetery.

The Panel considers that there should be an at-grade intersection at Alfred Street to provide further connectivity. The Panel is also concerned that the opportunity for multi-modal access to the coastal edge has not been addressed and parking bays would assist in achieving this outcome. The Panel also has concerns about the East West Link's impact on the Waikaraka Cemetery and in particular its loss of amenity.

Land bridge

The land bridge as proposed does not yet achieve a satisfactory level of urban connectivity, and the Panel would support proposals that extended the land bridge eastwards up to, and including at least, the 'New' Old Mangere Bridge crossing.

Public transport

The Auckland Plan's directive 13.5, and supporting map seeks to achieve an integrated rapid transit, rail and road network corridor along the proposed East West Link route. The Panel is concerned that the current proposal primarily provides for a roading solution.

The Panel considers that the light rail proposal between Onehunga and the airport is critical. The Panel is concerned that this has been left unresolved in the current proposal. This should be addressed comprehensively with integration between land use and transportation, and a presentation from Auckland Transport to this effect.

Galway Street alignment

The Panel has concerns about the proposed Galway Street alignment and its proximity to Onehunga Harbour Road. The Panel considers that a street grid extension is preferred to a curvilinear 'motorway onramp' style geometry. The Panel is also concerned about how this alignment could impact on the proposed light rail link between Onehunga and the airport.

The Panel has concerns about the proposed roundabout between Onehunga Harbour Road and Onehunga Mall and encourages the applicant to provide an alternative solution to support a more pedestrian-friendly environment that would assist connectivity with the 'New' Old Mangere Bridge.

Onehunga Wharf connection to Taumanu Reserve

The Panel has concerns about the width, amenity and functionality of the shared pedestrian cycle way between Onehunga Wharf and Taumanu Reserve, as illustrated in the photomontage. The Panel is also concerned that this will exacerbate the isolation and lack of amenity around the Sea Scouts Hall. The Panel considers that the current proposal is utilitarian in nature and recommends that a higher level of amenity for the cycleway and more spacious response to the ground around the building be provided.

Eastern section: Captain Springs Road to Sylvia Park

Road alignment

The Panel is of the view that the decision to relocate the proposed road way through the Anns Creek outer estuary is a retrograde step and the Panel supports a more northern alignment around the estuary.

Linkage of pedestrian and cycle connections

The Panel has concerns about the lack of linkage between the sections of the boardwalk and the shared pedestrian cycleway adjacent to the carriageway. The Panel would support further linkages between the two.

Proposed Karetu Portage Path

The Panel supports the recognition of Karetu Portage but has some reservations about its relationship and connection to the ground. However, the Panel has insufficient information to comment further. The Panel would welcome a presentation on this issue.

Height of outer shell and gravel bank

The Panel supports the naturalising of the Mangere Inlet's coastal edge as proposed by NZTA in the application at the levels described. Any future changes to raise bund levels can be accommodated in the course of future pond maintenance activities that are required over time.